Artificial Intelligence Systems

Code of Conduct

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Who Must Follow Our Code?

We expect all of our employees and Board members to know and follow the Code. Failure to do so can result in disciplinary action, including termination of employment. Moreover, while the Code is specifically written for Artificial Intelligence Systems N.V. (AIS) employees and Board members, we expect members of our extended workforce (temps, vendors, and independent contractors) and others who may be temporarily assigned to perform work or services for Artificial Intelligence Systems N.V. (AIS) to follow the Code in connection with their work for us. Failure of a member of our extended workforce or other covered service provider to follow the Code can result in termination of their relationship with Artificial Intelligence Systems N.V. (AIS).

What If I Have a Code-Related Question or Concern?

If you have a question or concern, don't just sit there. You can contact your manager or managing director. You can also submit a question or raise a concern of a suspected violation of our Code or any other Artificial Intelligence Systems N.V. (AIS) policy through company email. If you believe a violation of law has occurred, you can always raise that with the government agency Sociale Ontwikkeling, Arbeid en Welzijn on Curacao.

If you have a misconduct concern about the Managing Director, a direct report to the Managing Director, or a manager, you may also notify a government agency.

No Retaliation

Artificial Intelligence Systems N.V. (AIS) prohibits retaliation against any worker here at Artificial Intelligence Systems N.V. (AIS) who reports or participates in an investigation of a possible violation of our Code, policies, or the law. If you believe you are being retaliated against, please contact government agency Sociale Ontwikkeling, Arbeid en Welzijn on Curacao.

I. Serve Our Users

Our users value Artificial Intelligence Systems N.V. (AIS) not only because we deliver great products and services, but because we hold ourselves to a higher standard in how we treat users and operate more generally. Keeping the following principles in mind will help us to maintain that high standard:

Integrity

Our reputation as a company that our users can trust is our most valuable asset, and it is up to all of us to make sure that we continually earn that trust. All of our communications and other interactions with our users should increase their trust in us.

Usefulness

Our products, features, and services should make Artificial Intelligence Systems N.V. (AIS) more useful for all our users. We have many different types of users, from individuals to large businesses, but one guiding principle: "Is what we are offering useful based on the provided specifications?"

Privacy, Security, and Freedom of Expression

Always remember that we are asking users to trust us with their personal information. Preserving that trust requires that each of us respect and protect the privacy and security of such information.

Our security procedures strictly limit access to and use of users' personal information, and require that each of us take measures to protect user data from unauthorized access. Know your responsibilities under these procedures, and collect, use, and access user personal information only as authorized by our Security Policies, our Privacy Policies, and applicable data protection laws.

Artificial Intelligence Systems N.V. (AIS) is committed to advancing privacy and freedom of expression for our users around the world. Where user privacy and freedom of expression face government challenges, we seek to implement internationally recognized standards that respect those rights as we develop products, do business in diverse markets, and respond to government requests to access user information or remove user content. Contact management if you have questions on implementing these standards in connection with what you do at Artificial Intelligence Systems N.V. (AIS).

Responsiveness

Part of being useful and honest is being responsive: We recognize relevant user feedback when we see it, and we do something about it. We take pride in responding to communications from our users, whether questions, problems, or compliments. If something is broken, fix it.

Take Action

Any time you feel our users aren't being well-served, don't be bashful - let someone in the company know about it. Continually improving our products and services is a joint effort.

II. Support and Respect Each Other

Our principles

Artificial Intelligence Systems N.V. (AIS) has an unwavering commitment to prohibiting and effectively responding to harassment, discrimination, misconduct, abusive conduct, and retaliation. To that end, Artificial Intelligence Systems N.V. (AIS) adheres to these Guiding Principles:

Commitment: Artificial Intelligence Systems N.V. (AIS) sets a tone at the top of commitment to a respectful, safe, and inclusive working environment for all employees and members of the extended workforce.

Care: Artificial Intelligence Systems N.V. (AIS) creates an environment with an emphasis on respect for each individual at all levels of the organization, including specifically by offering assistance and showing empathy to employees and members of the extended workforce throughout and after the complaint process.

Transparency: Artificial Intelligence Systems N.V. (AIS) is open and transparent as an organization regarding the frequency with which complaints arise regarding harassment, discrimination, misconduct, abusive conduct, and retaliation, and the Company's approach to investigating and responding to those allegations.

Fairness & Consistency: Artificial Intelligence Systems N.V. (AIS) ensures that individuals are treated respectfully, fairly, and compassionately in all aspects of Alphabet interactions and applies policies, procedures, and outcomes consistently regardless of who is involved.

Accountability: Artificial Intelligence Systems N.V. (AIS) holds all individuals responsible for their actions, and ensures that where appropriate, those individuals hold others accountable too.

Our practice

Consistent with the Principles, Artificial Intelligence Systems N.V. (AIS) empoyees are expected to do their utmost to create a supportive work environment, where everyone has the opportunity to reach their fullest potential, and be free from harassment, intimidation, bias, and unlawful discrimination.

Equal Opportunity Employment

Employment here is based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination or harassment on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law. We also make all reasonable accommodations to meet our obligations under laws protecting the rights of the disabled.

Harassment, Discrimination, and Bullying

Artificial Intelligence Systems N.V. (AIS) prohibits discrimination, harassment and bullying in any form – verbal, physical, or visual. If you believe you've been bullied, harassed, or discriminated against by anyone at Artificial Intelligence Systems N.V. (AIS), or by an Artificial Intelligence Systems N.V. (AIS) partner or vendor, we strongly encourage you to immediately report the incident to your manager. Similarly, managers who learn of any such incident should immediately report it to Managing director. The managing director will promptly and thoroughly investigate any complaints and take appropriate action.

Drugs and Alcohol

Our position on substance abuse is simple: It is incompatible with the health and safety of our employees, and we don't permit it. Illegal drugs in our offices or at sponsored events are strictly prohibited. If a manager has reasonable suspicion to believe that an employee's use of drugs and/or alcohol may adversely affect the employee's job performance or the safety of the employee or others in the workplace, the manager may request an alcohol and/or drug screening. A reasonable suspicion may be based on objective symptoms such as the employee's appearance, behavior, or speech.

Safe and Healthy Workplace

We are committed to a safe, healthy, and violence-free work environment. Behavior that poses risk to the safety, health, or security of Artificial Intelligence Systems N.V. (AIS) employees, our extended workforce, or visitors is prohibited. If you become aware of a risk to the safety, health, or security of

our workplace, you should report it to Artificial Intelligence Systems N.V. (AIS) management immediately. If it is life-threatening or an emergency, call your local police, fire, or other emergency responders first, and then report it to Artificial Intelligence Systems N.V. (AIS) management.

III. Avoid Conflicts of Interest

When you are in a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of Artificial Intelligence Systems N.V. (AIS) or our users, you may be faced with a conflict of interest. All of us should avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict.

When considering a course of action, ask yourself whether the action you're considering could create an incentive for you, or appear to others to create an incentive for you, to benefit yourself, your friends or family, or an associated business at the expense of Artificial Intelligence Systems N.V. (AIS).If the answer is "yes," the action you're considering is likely to create a conflict of interest situation, and you should avoid it.

Below, we provide guidance in seven areas where conflicts of interest often arise:

1. Personal investments
2. Outside employment, advisory roles, board seats, and starting your own business
3. Business opportunities found through work
4. Inventions
5. Friends and relatives; co-worker relationships
6. Accepting gifts, entertainment, and other business courtesies
7. Use of Artificial Intelligence Systems N.V. (AIS) products and services

In each of these situations, the rule is the same – if you are considering entering into a business situation that creates a conflict of interest, don't. If you are in a business situation that may create a conflict of interest, or the appearance of a conflict of interest, review the situation with your manager. Finally, it's important to understand that as circumstances change, a situation that previously didn't present a conflict of interest may present one.

Personal Investments

Avoid making personal investments in companies that are Artificial Intelligence Systems N.V. (AIS) competitors or business partners when the investment might cause, or appear to cause, you to act in a way that could harm Artificial Intelligence Systems N.V. (AIS).

When determining whether a personal investment creates a conflict of interest, consider the relationship between the business of the outside company, Artificial Intelligence Systems N.V. (AIS)'s business, and what you do at Artificial Intelligence Systems N.V. (AIS), including whether the company has a business relationship with Artificial Intelligence Systems N.V. (AIS) that you can

influence, and the extent to which the company competes with Artificial Intelligence Systems N.V. (AIS). You should also consider 1) any overlap between your specific role at Artificial Intelligence Systems N.V. (AIS) and the company's business, 2) the significance of the investment, including the size of the investment in relation to your net worth, 3) whether the investment is in a public or private company, 4) your ownership percentage of the company, and 5) the extent to which the investment gives you the ability to manage and control the company.

Investments in venture capital or other similar funds that invest in a broad cross-section of companies that may include Artificial Intelligence Systems N.V. (AIS) competitors or business partners generally do not create conflicts of interest. However, a conflict of interest may exist if you control the fund's investment activity.

Outside Employment, Advisory Roles, Board Seats, and Starting Your Own Business

Avoid accepting employment, advisory positions, or board seats with Artificial Intelligence Systems N.V. (AIS) competitors or business partners when your judgment could be, or could appear to be, influenced in a way that could harm Artificial Intelligence Systems N.V. (AIS). Additionally, because board seats come with fiduciary obligations that can make them particularly tricky from a conflict of interest perspective, you should notify your manager before accepting a board seat with any outside company.

Business Opportunities Found Through Work

Business opportunities discovered through your work here belong first to Artificial Intelligence Systems N.V. (AIS), except as otherwise agreed to by Artificial Intelligence Systems N.V. (AIS).

Inventions

Developing or helping to develop outside inventions that a) relate to Artificial Intelligence Systems N.V. (AIS)'s existing or reasonably anticipated products and services, b) relate to your position at Artificial Intelligence Systems N.V. (AIS), or c) are developed using Artificial Intelligence Systems N.V. (AIS) corporate resources may create conflicts of interest and be subject to the provisions of Artificial Intelligence Systems N.V. (AIS)'s Confidential Information and Invention Assignment Agreement and other employment agreements. If you have any questions about potential conflicts or intellectual property ownership involving an outside invention or other intellectual property, consult Ethics & Compliance or Legal.

Personal Relationships at Work

Certain relationships within Artificial Intelligence Systems N.V. (AIS) may compromise or be seen to compromise your ability to perform your job responsibilities, may create uncomfortable or conflicted positions, and may raise issues of fairness, favoritism, or harassment. Therefore, be mindful of how your relationships within Artificial Intelligence Systems N.V. (AIS) could impact or be perceived by others. Romantic, physical or familial relationships are not permitted between an

Artificial Intelligence Systems N.V. (AIS) employee and another Artificial Intelligence Systems N.V. (AIS) employee or member of the extended workforce where one individual is in a position to exercise authority or supervision over the other. This prohibition includes any situation where one person is in the reporting line of the other, or, for example, a situation where one person is a project or a technical lead on a project on which the other person is working.

Accepting Gifts, Entertainment, and Other Business Courtesies

Accepting gifts, entertainment, and other business courtesies from an Artificial Intelligence Systems N.V. (AIS)'s competitor or business partner can easily create the appearance of a conflict of interest, especially if the value of the item is significant. All Artificial Intelligence Systems N.V. (AIS)'s Non-Government Related Gifts & Client Entertainment must have management approval on when it is appropriate for Artificial Intelligence Systems N.V. (AIS) employees to accept gifts, entertainment, or any other business courtesy (including discounts or benefits that are not made available to all Artificial Intelligence Systems N.V. (AIS) employees) from any of our competitors or business partners.

Generally, acceptance of inexpensive "token" non-cash gifts is permissible. In addition, infrequent and moderate business meals and entertainment with clients and infrequent invitations to attend local sporting events and celebratory meals with clients can be appropriate aspects of many Artificial Intelligence Systems N.V. (AIS) business relationships, provided that they aren't excessive and don't create the appearance of impropriety. Before accepting any gift or courtesy, consult with management and you may need to obtain manager approval.

Artificial Intelligence Systems N.V. (AIS) does not tolerate bribery and as such you may not give, offer, promise, provide or, solicit (directly or through others) anything of value to anyone, including government officials or corporate representatives, in exchange for some improper advantage. Our anti-corruption rules also apply to anything you might receive.
Never use your position to solicit, demand or obtain anything of value that may improperly influence your decisions as an Employee. Many jurisdictions have restrictions on Gifts, Entertainment and other expenses involving government officials. In addition, you may also not give money or anything of value indirectly (for example, to a consultant, agent, intermediary, Business Partner or other Third Party) if the circumstances indicate that all or part of it may possibly be directly or indirectly passed on to a government official to influence official action or obtain an improper advantage or to a private commercial counterparty to consideration for an unfair advantage in a business transaction. For that reason, Employees responsible for hiring consultants, agents, partners in joint ventures or comparable entities must take action as appropriate to:

- Ensure that those Third Parties understand and will abide our Anti-Bribery and Corruption Policy;
- Evaluate the qualifications and reputation of such Third Parties; and
- Include appropriate provisions in agreements and contracts designed to protect AIS.

Finally, each investment decision made by the Company – whether it is the pursuit of a controlling interest in a company or a minority interest, or a joint venture arrangement – must include both a due diligence and a prior compliance check. More details can be found in AIS's Anti-Bribery and Corruption Policy.

Use of Artificial Intelligence Systems N.V. (AIS) Products and Services

Avoiding potential conflicts of interest also means that you should not use Artificial Intelligence Systems N.V. (AIS) products, services, internal tools, or information in a way that improperly benefits you or someone you know or creates the appearance that you have an unfair advantage over users outside of Artificial Intelligence Systems N.V. (AIS). For example, you should never approve Artificial Intelligence Systems N.V. (AIS) accounts, services, or credits for yourself, your friends, or family members. Similarly, you should not use the tools, information, or access that you have as an Artificial Intelligence Systems N.V. (AIS) employee to participate in or to generate a financial benefit for yourself or others from invalid ad traffic (IVT) on Artificial Intelligence Systems N.V. (AIS) products, such as generating IVT, purchasing or selling IVT (except for the purposes of company sanctioned research), or linking to (or appearing to link to) business partners that may be engaging in IVT. If you find yourself subject to a conflict of interest regarding the use of Artificial Intelligence Systems N.V. (AIS)'s products, services, tools, or information, discuss the situation with your manager.

IV. Preserve Confidentiality

Certain kinds of company information, if leaked prematurely into the press or to competitors, can hurt our product and services, eliminate our competitive advantage and prove costly in other ways. Our responsibilities extend beyond not revealing Confidential Artificial Intelligence Systems N.V. (AIS) material – we must also:

properly secure, label, and (when appropriate) dispose of Confidential Artificial Intelligence Systems N.V. (AIS) material;

safeguard Confidential information that Artificial Intelligence Systems N.V. (AIS) receives from others under non-disclosure agreements;

take steps to keep our trade secrets and other confidential intellectual property secret.

Confidential Information

At times, a particular project or negotiation may require you to disclose Need to Know or Confidential information to an outside party: Disclosure of that information should be on an "only as needed" basis and only under a non-disclosure agreement. In addition, Artificial Intelligence Systems N.V. (AIS) policy may require a prior security assessment of the outside party that is to receive the confidential information. Be sure to conduct the appropriate due diligence and have the appropriate agreement in place before you disclose the information.

There are, of course, "gray areas" in which you will need to apply your best judgment in making sure you don't disclose any confidential information. Suppose a friend who works at a non-profit organization asks you informally how to improve the Artificial Intelligence Systems N.V. (AIS) search ranking of the group's website: Giving your friend site-optimization tips available in public articles and on websites isn't likely to be a problem, but giving tips that aren't publicly known definitely would be. If you're in a gray area, be cautious in what advice or insight you provide or, better yet, ask for guidance from management.

And don't forget about pictures you and your guests take at Artificial Intelligence Systems N.V. (AIS) – it is up to you to be sure that those pictures don't disclose confidential information.

Finally, some of us will find ourselves having family or other personal relationships with people employed by our competitors or business partners. As in most cases, common sense applies. Don't tell your significant other or family members anything confidential, and don't solicit confidential information from them about their company.

Artificial Intelligence Systems N.V. (AIS) Partners

Just as you are careful not to disclose confidential Artificial Intelligence Systems N.V. (AIS) information, it's equally important not to disclose any confidential information from our partners. Don't accept confidential information from other companies without first having all parties sign an appropriate Non-disclosure Agreement approved by Legal. Even after the agreement is signed, try only to accept as much information as you need to accomplish your business objectives.

Competitors/Former Employers

We respect our competitors and want to compete with them fairly. But we don't want their confidential information. The same goes for confidential information belonging to any Artificial Intelligence Systems N.V. (AIS) employees former employers. If an opportunity arises to take advantage of a competitor's or former employer's confidential information, don't do it. Should you happen to come into possession of a competitor's confidential information, contact Legal immediately.

Outside Communications

You probably know that our policy is to be extremely careful about disclosing confidential proprietary information. Consistent with that, you should also ensure your outside communications (including online and social media posts) do not disclose confidential proprietary information or represent (or otherwise give the impression) that you are speaking on behalf of Artificial Intelligence Systems N.V. (AIS) unless you're authorized to do so by the company. The same applies to communications with the press. Finally, check with your manager before accepting any public speaking engagement on behalf of the company. In general, before making any external communication or disclosure, you should consult with management.

V. Protect Artificial Intelligence Systems N.V. (AIS)'s Assets

Artificial Intelligence Systems N.V. (AIS) has a well-earned reputation for generosity with our employee benefits and openness with confidential information shared within the company. Our ability to continue these practices depends on how well we conserve company resources and protect company assets and information.

Intellectual Property

Artificial Intelligence Systems N.V. (AIS)'s intellectual property rights (our trademarks, logos, copyrights, trade secrets, "know-how", and patents) are among our most valuable assets. Unauthorized use can lead to their loss or serious loss of value. You must respect all copyright and other intellectual property laws, including laws governing the fair use of copyrights, trademarks, and brands. You must never use Artificial Intelligence Systems N.V. (AIS)'s (or its affiliated entities') logos, marks, or other protected information or property for any business or commercial venture without

pre-clearance from management. We strongly encourage you to report any suspected misuse of trademarks, logos, or other Artificial Intelligence Systems N.V. (AIS) intellectual property to the managing director.

Likewise, respect the intellectual property rights of others. Inappropriate use of others' intellectual property may expose Artificial Intelligence Systems N.V. (AIS) and you to criminal and civil fines and penalties. Please seek advice from management before you solicit, accept, or use proprietary information from individuals outside the company or let them use or have access to Artificial Intelligence Systems N.V. (AIS) proprietary information. You should also check with management if developing a product that uses content not belonging to Artificial Intelligence Systems N.V. (AIS).

Company Equipment

Artificial Intelligence Systems N.V. (AIS) gives us the tools and equipment we need to do our jobs effectively but counts on us to be responsible and not wasteful with the Artificial Intelligence Systems N.V. (AIS) stuff we are given. Nobody's going to complain about any small infringement on Friday morning, but company funds, equipment, and other physical assets are not to be requisitioned for purely personal use. Not sure if a certain use of company assets is, okay? Please ask your manager.

The Network

Artificial Intelligence Systems N.V. (AIS)'s communication facilities (which include both our network and the hardware that uses it, like computers and mobile devices) are a critical aspect of our company's property, both physical and intellectual. Be sure to follow all security policies. If you have any reason to believe that our network security has been violated – for example, you lose your laptop or smart phone or think that your network password may have been compromised – please promptly report the incident management.

Physical Security

If you're not careful, people may steal your stuff. Always secure your laptop, important equipment, and your personal belongings, even while on Artificial Intelligence Systems N.V. (AIS)'s premises. Don't tamper with or disable security and safety devices. If you see someone in a secure space whom you do not recognize, report that, and any other suspicious activity, to Artificial Intelligence Systems N.V. (AIS) management.

Use of Artificial Intelligence Systems N.V. (AIS)'s Equipment and Facilities

Anything you do using Artificial Intelligence Systems N.V. (AIS)'s corporate electronic facilities (e.g., our computers, mobile devices, network, etc.) or store on our premises (e.g., letters, memos, and other documents) might be disclosed to people inside and outside the company. For example, Artificial Intelligence Systems N.V. (AIS) may be required by law (e.g., in response to a subpoena or warrant) to monitor, access, and disclose the contents of corporate email, voicemail, computer files,

and other materials on our electronic facilities or on our premises. In addition, the company may monitor, access, and disclose employee communications and other information on our corporate electronic facilities or on our premises where there is a business need to do so, such as protecting employees and users, maintaining the security of resources and property, or investigating suspected employee misconduct.

VI. Ensure Financial Integrity and Responsibility

Financial integrity and fiscal responsibility are core aspects of corporate professionalism. This is more than accurate reporting of our financials, though that's certainly important. The money we spend on behalf of Artificial Intelligence Systems N.V. (AIS) is not ours; it's the company's and, ultimately, our shareholders'. Each person at Artificial Intelligence Systems N.V. (AIS) – not just those in Finance – has a role in making sure that money is appropriately spent, our financial records are complete and accurate, and internal controls are honored. This matters every time we hire a new vendor, expense something to Artificial Intelligence Systems N.V. (AIS), sign a new business contract, or enter into any deals on Artificial Intelligence Systems N.V. (AIS)'s behalf.

To make sure that we get this right, Artificial Intelligence Systems N.V. (AIS) maintains a system of internal controls to reinforce our compliance with legal, accounting, tax, and other regulatory requirements in every location in which we operate.

Stay in full compliance with our system of internal controls, and don't hesitate to contact management or Finance if you have any questions. What follows are some core concepts that lie at the foundation of financial integrity and fiscal responsibility here at Artificial Intelligence Systems N.V. (AIS).

Spending Artificial Intelligence Systems N.V. (AIS)'s Money

A core Artificial Intelligence Systems N.V. (AIS) value has always been to spend money wisely. When you submit an expense for reimbursement or spend money on Artificial Intelligence Systems N.V. (AIS)'s behalf, make sure that the cost is reasonable, directly related to company business, and supported by appropriate documentation. Always record the business purpose (e.g., if you take someone out to dinner on Artificial Intelligence Systems N.V. (AIS), always record the full names and titles of the people who attended as well as the reason for the dinner) and comply with other submission requirements. If you're uncertain about whether you should spend money or submit an expense for reimbursement, check with your manager. Managers are responsible for all money spent and expenses incurred by their direct reports, and should carefully review such spending and expenses before approving.

Signing a Contract

Each time you enter into a business transaction on Artificial Intelligence Systems N.V. (AIS)'s behalf, there should be documentation recording that agreement, approved by the Legal Department. Signing a contract on behalf of Artificial Intelligence Systems N.V. (AIS) is a very big deal. Never sign any contract on behalf of Artificial Intelligence Systems N.V. (AIS) unless all of the following are met:

- You are authorized to do so under our Signature Authority and Approval. If you are unsure whether you are authorized, ask your manager
- The contract has been approved by management. If you are using an approved Artificial Intelligence Systems N.V. (AIS) form contract, you don't need further management approval unless you have made changes to the form contract or are using it for other than its intended purpose
- You have studied the contract, understood its terms and decided that entering into the contract is in Artificial Intelligence Systems N.V. (AIS)'s interest
- All contracts at Artificial Intelligence Systems N.V. (AIS) should be in writing and should contain all of the relevant terms to which the parties are agreeing – Artificial Intelligence Systems N.V. (AIS) does not permit "side agreements," oral or written.

Reporting Financial or Accounting Irregularities

It goes without saying (but we're going to say it anyway) that you should never, ever interfere in any way with the auditing of Artificial Intelligence Systems N.V. (AIS)'s financial records. Similarly, you should never falsify any record or account, including time reports, expense accounts, and any other Artificial Intelligence Systems N.V. (AIS) records.

Hiring Suppliers

As Artificial Intelligence Systems N.V. (AIS) grows, we enter into more and more deals with suppliers of equipment and services. We should always strive for the best possible deal for Artificial Intelligence Systems N.V. (AIS). This almost always requires that you solicit competing bids to make sure that you're getting the best offer. While price is very important, it isn't the only factor worth considering. Quality, service, reliability, and the terms and conditions of the proposed deal may also affect the final decision. Please do not hesitate to contact the Purchasing manager if you have any questions regarding how to procure equipment or services.

Retaining Records

It's important that we keep records for an appropriate length of time. The Artificial Intelligence Systems N.V. (AIS) Records Retention Policy suggests minimum record retention periods for certain types of records. These are great guidelines, but keep in mind that legal requirements, accounting rules, and other external sources sometimes specify longer retention periods for certain types of records, and those control where applicable.

VII. Obey the Law

Artificial Intelligence Systems N.V. (AIS) takes its responsibilities to comply with laws and regulations very seriously and each of us is expected to comply with applicable legal requirements and prohibitions. While it's impossible for anyone to know all aspects of every applicable law, you should understand the major laws and regulations that apply to your work. Take advantage of Legal and

Ethics & Compliance to assist you here. A few specific laws are easy to violate unintentionally and so are worth pointing out here:

Trade Controls

If you are in any way involved in sending or making available Artificial Intelligence Systems N.V. (AIS) products, services, software, equipment, or any form of technical data from one country to another, work with your manager to be absolutely sure that the transaction stays well within the bounds of applicable laws

Competition Laws

Artificial Intelligence Systems N.V. (AIS) is committed to competing fair and square.. Any personnel found to have violated Artificial Intelligence Systems N.V. (AIS)'s policies will, subject to local laws, be disciplined, up to and including termination of employment

Anti-bribery Laws

Like all businesses, Artificial Intelligence Systems N.V. (AIS) is subject to lots of laws, both Curacao and non-Curacao, that prohibit bribery in virtually every kind of commercial setting. The rule for us at Artificial Intelligence Systems N.V. (AIS) is simple – don't bribe anybody, anytime, for any reason.

Non-government relationships

You should be careful when you give gifts and pay for meals, entertainment, or other business courtesies on behalf of Artificial Intelligence Systems N.V. (AIS). We want to avoid the possibility that the gift, entertainment, or other business courtesy could be perceived as a bribe, so it's always best to provide such business courtesies infrequently and, when we do, to keep their value moderate.

Dealing with government officials

Offering gifts, entertainment, or other business courtesies that could be perceived as bribes becomes especially problematic if you're dealing with a government official. "Government officials" include any government employee; candidate for public office; or employee of government-owned or -controlled companies, public international organizations, or political parties.

In sum, before offering any gifts or business courtesies to a Curacao or other government official, you should consult Artificial Intelligence Systems N.V. (AIS)'s management.

VIII. Conclusion

Artificial Intelligence Systems N.V. (AIS) aspires to be a different kind of company. It's impossible to spell out every possible ethical scenario we might face. Instead, we rely on one another's good judgment to uphold a high standard of integrity for ourselves and our company. We expect all Artificial Intelligence Systems N.V. (AIS) employees to be guided by both the letter and the spirit of this Code. Sometimes, identifying the right thing to do isn't an easy call. If you aren't sure, don't be afraid to ask questions.

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