

Center for Artificial Intelligence and Quantum Computing in System Brain Research

Deliverable 2.5

Ethical Codex





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Does this report contain confidential information?	Yes □ No ☑
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1. Purpose and Scope

Every activity at INDRC, Partners and CLARA, including research and scientific activities, is based on honouring fundamental principles of appropriate conduct and other ethical principles, such as honesty, morality, integrity, professionalism, quality, impartiality, objectivity, responsibility towards society, anti-corruption, respect and fairness, legality, confidentiality and neutrality.

Purpose of this Policy is to provide a framework that contains model rules of appropriate desired conduct and fundamental ethical principles to be followed by the all Partners Personnel in the course of their activities at CLARA. The rules set by this Policy are standards applicable for relationships within CLARA internally as well as for external conduct of the CLARA Personnel and is binding for the CLARA Personnel as an internal policy.

The aim of this Policy is to set guidelines for the CLARA Personnel, so they contribute to refraining from unethical and/or inappropriate behavior not only in relation to their own behavior but also in relation to the behavior of other CLARA Personnel in order to maintain an ethical workplace.

Observed unethical and/or otherwise inappropriate conduct of other CLARA Personnel shall be discussed and/or reported via mechanisms established by this Policy according to the significance of such conduct. Any form of retaliation following the report of such breach is forbidden. At the same time, this Policy also establishes mechanisms rectifying misconducts depicted herein and roles of certain individuals within the CLARA structure.

Since this Policy establishes a general guidance, it is not intended to be all-encompassing. Other than mentioned conduct may also show signs which would not be deemed appropriate and/or ethical as per this Policy. In this regard, CLARA appeals to common sense of the CLARA Personnel and their conscience. Also, this Policy does not substitute for everyone's judgement and morality in general.

This Policy applies to all CLARA Personnel.

This Policy sets the minimum standard that must be complied with. In cases where legal regulations or contractual obligations set higher standards, these higher standards must prevail.

2. Supervision

The CLARA Director holds responsibility for ensuring compliance with the provisions of this Policy.

3. Definitions

For the purpose of this Policy:

CLARA means project Center for Artificial Intelligence and Quantum Computing in System Brain Research.

CLARA Director means a person who was appointed a director or interim director of the CLARA Project by INDRC.

Director means INDRC Director or CLARA Director or a director of any other Party of the CLARA. Each Director shall exercise the rights and responsibilities of a Director under this Policy with respect to the specific branch, unit, or project they oversee. When this Policy instructs to contact "the Director", it shall be understood to mean the Director of the branch, unit, or project to which the Personnel are assigned.















Ethics & Security Manager means a person who addresses key ethical considerations regarding research ethics, Al compliance and data privacy. The person acting as Ethics & Security Manager can be Ethics & Security specialist (junior manager) if supervised by senior mentor.

Foreground means project results, whether technical, scientific, commercial or educational, generated within CLARA Project.

INDRC means International Neurodegenerative Disorders Research Center, zapsaný ústav and other branches, units or projects created under the INDRC, or projects which are under the supervision of INDRC, including CLARA, or project on which INDRC cooperates with other organizations.

INDRC Director means a person who was appointed an executive director of INDRC.

CLARA Personnel or you mean any employee, or member of any governing, supervisory or advisory body of CLARA. For the purposes of this definition, individuals providing expert services to CLARA, in relation to the scope of the CLARA activities (and not acting as a Third Party) shall also be considered CLARA Personnel.

Policy means this Code of Conduct & Ethical Code.

Policy on Conflict of Interest means the policy issued by CLARA specifically setting rules relating to conflict of interest at CLARA.

4. Responsibilities

The Director oversees communication, dissemination, training, and adherence to this Policy.

CLARA Personnel must familiarize themselves with the Ethical Codex, including all appendices, before starting work.

CLARA expects all CLARA Personnel to conduct themselves in an exemplary manner and to fully comply with the provisions herein. Failure to comply with the terms of this Policy may be subject to disciplinary actions in accordance with applicable labor law(s) as applicable.

5. Fundamental Principles of Conduct

5.1. Honesty, Morality and Integrity

CLARA promotes the highest standards of honesty, morality and integrity in every activity.

Upholding those values is crucial in research activities and they should be reflected in all stages of such activities. However, in case a principle is similarly to be upheld in an activity other than research even though it is expressly stated herein as to be followed during a research activity, the principle shall also apply to such other activity.

When conducting research, make sure you use relevant data. This includes selecting input data to the best of your knowledge based on a prior professional analysis on the suitability of data, manipulating with the data professionally and interpreting the data as best as you can. Proper and honest records shall be kept about the handling of all data during the course of research.

Throughout your research, make sure you use appropriate scientific methods and procedures, make records of them and report honestly about them.















All research results, including work published, should clearly and properly cite the sources of your or other people's ideas and scientific outputs. Authors shall not be omitted or added. Since plagiarism is considered to be a severe violation of rules under this Policy, always keep in mind and respect intellectual property of others by giving them credit through citation in your own work. This applies to co-authorship as well.

In some cases, permission may be required in order to use the intellectual property of others in your own work. In those cases, make sure you obtain such permission prior to using it in your work.

Unacceptable dishonest and immoral practices are to be avoided at all times. Those comprise covering up your or another CLARA Personnel's misconduct occurring at any stage of the research activity, inappropriate manipulation and/or selection of data including plagiarism, fabrication by creating false data or fabrication of another aspect of research, deception by intentionally presenting flawed interpretation of data, suppression of relevant findings and intentional failure to address other possible infringements of principles depicted herein. Keep in mind that the listing of unacceptable practices provided herein may not be comprehensive and always avoid activities which could cloud your professional, moral and ethical judgement.

CLARA Personnel uses CLARA's property (including intellectual property) with care and not for their own private benefit or for the benefit of a third person.

It is possible that in a particular situation you might be challenged in what course of action to take. When in doubt whether a particular conduct respects principles of honesty, morality and/or integrity, consult with your superior, Ethics Officer or respective Director.

5.2. Professional Behaviour, Legality and Quality

The CLARA Personnel shall carry out their work and duties responsibly and with effort supporting CLARA's high-level aspirations, carefully, thoroughly, efficiently and at a high professional and quality level. During the course of all activities, all CLARA Personnel must comply with legal regulations as well as professional standards applicable for their specific profession and internal regulations and policies. All CLARA Personnel are obliged to be acquainted with and to observe relevant legal regulation applicable for their field of expertise and activities.

At CLARA, everyone is encouraged to behave in a manner that builds and keeps trust in scientific and research activities, not only amongst other professionals but also amongst non-professionals. Therefore, at all times, the CLARA Personnel shall avoid actions which could discredit them as professionals in their field of expertise and also discredit CLARA. This includes activities conducted not only in working hours but outside of working hours as well.

Research freedoms and difference in opinions shall be honoured as well as constructive criticism communicated politely, critical examination of work and discussions over a particular topic.

With respect to research activities, always keep good records of those activities and respect scientific methods, procedures and rules of the research field even when engaging in activities for the purpose of finding something new (more information is given in the preceding section of this Policy).

Professional growth is encouraged at CLARA as well as continuous knowledge-building in the CLARA Personnels' respective fields.

When cooperating with other colleagues, be polite and open to their opinions.

Respect confidentiality obligations and do not disclose any confidential information to third persons outside CLARA, as applicable. Always keep CLARA's data secure. When designing a project, consider whether personal data will be processed.















5.3. Responsibility to Society

The CLARA Personnel is encouraged to engage in pro bono activities for non-profit organizations, individuals or groups of individuals and government. Volunteering of time by the CLARA Personnel is also supported.

While pro bono and volunteer work is endorsed, the CLARA Personnel must remain mindful of their work responsibilities and obligations.

At CLARA, sustainability questions are also considered. CLARA is committed to decreasing negative environmental impact of its activities and encourages to recycle, to reduce energy consumption, single-use items and waste in general. We also seek to cooperate with vendors and suppliers aligning with our environmental values.

5.4. Objectivity, Impartiality and Anti-Corruption

At all times, remain impartial and independent in all of your work activities and avoid situations as a result of which a conflict of interest might occur. Conflict of interest might affect the impartiality and independence of a person since he/she makes decisions based on having a certain social or financial link to another person. More specific rules and reporting mechanisms relating to conflict-of-interest matters are set in the Policy on Conflict of Interest.

Conducts and factors which may override professional judgement or improperly influence objectivity are to be avoided.

At CLARA, everyone shall be committed to abide rules against bribery and corruption and act transparently. You shall neither give bribes nor accept them, i.e. you shall not give or accept something of value in order that a certain action is influenced and/or achieved.

Gifts and favors in any form, monetary or non-monetary, and for a specific purpose (e.g. donations, grants, etc.) may be accepted only when there are proper grounds for such acceptance stipulated in the respective legal regulation and under conditions set therein and in other related CLARA policies. Always consult designated persons at CLARA if unsure whether you are entitled to accept a gift, especially if the gift is of a higher value.

In order to assess whether a gift is appropriate, good judgement should be applied, and the following warning signs shall be taken into account:

- Is the gift extravagant?
- What is the hidden or anticipated purpose of the gift?
- Will the party who provided or accepted the gift still be able to make an objective decision?
- Will you feel more obligated to the gift giver after accepting the gift?
- What about public scrutiny?

Frequent examples of excluded/prohibited Gifts include:

- Benefits, such as airline tickets, paid vacations;
- Items of Value except for purely symbolic gifts;
- Engaging (including the promise to engage) of close Related Person or co-workers; and
- The allocation of benefits that are intended to influence an individual's business decisions. Examples of such benefits include tuition and charitable contributions.

For more details concerning policy on an item of value, please see Policy on Conflict of Interest.















5.5. Respect and Fair Treatment

Diversity, fairness, treating people with respect and openness is honoured at CLARA.

CLARA encourages equal opportunities. Discrimination based on the grounds of race, ethnic origin, nationality, sex, sexual orientation, age, disability, religion, belief or belief is unacceptable. Also, no form of harassment will be tolerated. That includes sexual harassment or other forms of harassment intending to diminish a person's dignity and/or creating an intimidating, hostile, humiliating and/or abusive workplace.

The CLARA Personnel is encouraged to express different views and opinions and to utilize their unique skillsets and should be treated with respect for doing so. Collegiality and academic cooperation amongst the CLARA Personnel is supported. Difference in opinions and views shall be communicated respectfully.

Disrespectful treatment of other people shall be discussed and/or reported via appropriate mechanisms set by this Policy.

5.6. Neutrality

While diversity and difference in views and opinions are fully respected at CLARA, CLARA's workplace remains neutral in religious, philosophical and political matters.

Wearing outer symbols of religious, philosophical and political affiliation is permitted if the framework of this Policy is observed at the same time.

It is not acceptable to use the workplace for promoting interests of political parties and/or movements.

5.7. Ethics and Artificial Intelligence

Special rules relating to ethical questions in the context of artificial intelligence are set within the scope of the Policy against Research and Al misconduct.

5.8. Digital Humanism

The Human-Centric Core Values must be upheld alongside the ethical foundations set out in this Policy:

- **Human dignity and self determination** individuals remain means to an end, and must retain meaningful authority over the digital systems that affect them.
- **Freedom of expression and access to information** digital infrastructures shall strengthen, not restrain, the research projects.
- Privacy and data sovereignty personal data shall be processed lawfully, transparently and minimally.
- **Equality, inclusion and non discrimination** Al and digital systems must be demonstrably fair across all legally protected characteristics.
- Rule of law and accountability algorithmic and quantum processes must remain traceable, auditable and subject to effective remedy.
- **Human oversight & control** Every fully or partially automated system shall incorporate mechanisms for timely human intervention or override.
- **Bias & performance metrics** Each model shall define fairness and robustness metrics, publish them in project documentation and monitor drift throughout the lifecycle.

















6. Breaches of this Policy and Reporting of Misconduct

Refrain from actions which could lead to breaches of rules under this Policy and those which may harm reputation of CLARA as well as your own. If you are aware of any breaches of this Policy, observed them or suspect them (i.e. you have any knowledge about breaches that already occurred or you think that they might occur in the future), you are encouraged to report them in a timely and proper manner while maintaining confidentiality.

All reports on misconduct shall be investigated duly, fairly, objectively and thoroughly, by authorized personnel at CLARA (see the subsequent section of this Policy). The identity of the reporter shall not be disclosed to anyone other than personnel authorized to deal with such breaches.

Any form of retaliation against the CLARA Personnel following reporting submitted in good faith is strictly prohibited. Those forms of retaliation could include the following:

- termination of employment or other cooperation;
- suspension, demotion (in rank, remuneration or other benefits) or other change relating to a job position (e.g. forced transfer to another position);
- denial of promotion and/or raises in remuneration and other benefits;
- hostile behavior (incl. bullying, verbal abuse, psychological or physical threats);
- isolating or ignoring behavior (exclusion from projects or meetings, social isolation);
- unjustified criticism;
- intentional spread of slander which could result in damage to one's reputation and pose a threat to career advancement

Any form of retaliation, either expressly stated herein or that may be interpreted as such, is also considered to be a grave breach of this Policy.

At the same time, reports which are not made in good faith, i.e. fabricated reports that are submitted to inflict harm, shall also be investigated as per this Policy and considered to be a breach of it.

7. Role of CLARA Bodies

Depending on the gravity of a breach of this Policy, you might feel challenged to solve the question of who the appropriate reporting and consulting channel is.

At CLARA, the office of a specialized Ethics Officer has been established to provide further guidance and training on ethical matters and help solving ethical issues and breaches of this Policy. You may consult all ethics related questions and concerns whenever unsure with the Ethics Officer.

When unsure how to proceed in a specific situation, you are also always welcome to seek guidance from your immediate superior. If you feel your issue is of a minor gravity, your immediate superior may be the appropriate reporting channel who could solve the issue himself/herself without the need to further engage other bodies and/or specialized officers.

In case your immediate superior ascertains that the issue being handled is of a higher than minor gravity, he/she shall escalate this issue to the established Ethics Officer who will work on resolving the issue.

Most severe breaches of this Code shall be reported to the CLARA Director . Amongst those are breaches relating to corruption and bribery. Such reports may be filed by anyone who observed, is aware or have reasons to suspect















that the CLARA Personnel engage in activities resulting in bribery/corruption, or by any immediate superior of such person.

7.1. Ethical Committee

Any research protocol that involves human participants, personal data capable of identifying a natural person, biological specimens, interventions that may affect physical or psychological well-being, or the deployment of technologies that could materially influence individual rights or freedoms, shall be submitted to the Ethical Committee for prior approval. No such study may commence, nor may data, results or deliverables arising therefrom be disclosed or placed on the market, until a favorable opinion has been issued.

In deliberating on each submission the Ethical Committee shall apply, as a minimum standard, the fundamental rights and principles set out in the Charter of Fundamental Rights of the European Union, with particular regard to human dignity (Art. 1), right to integrity the integrity of the person (Art. 3), respect for private life and private life, (Art. 7), protection of personal data (Art. 8) and non-discrimination (Art. 21). For clinical and biomedical studies, the Ethical Committee shall ensure full conformity with the World Medical Association's Declaration of Helsinki on Ethical Principles for Medical Research Involving Human Subjects, Convention for the Protection of Human Rights and Dignity of the Human Being with regard to the Application of Biology and Medicine, incl. The Additional Protocol, thereby safeguarding both the physical and the moral integrity of individuals.

7.2. Ethics & Security Manager

CLARA shall appoint one Ethics & Security Manager from among suitably qualified persons possessing demonstrable expertise in research ethics, data protection, information security management and European Union research framework compliance.

The Ethics & Security Manager shall advance and safeguard all activities carried out in CLARA, the fundamental principles that are promoted by this Policy.

The Ethics & Security Manager shall report directly to the CLARA Director and shall enjoy functional independence from all units, projects etc. to safeguard impartiality and objectivity.

The term of office, conditions of employment and resources allocated to the Ethics & Security Manager shall be sufficient to enable the effective, proactive and continuous performance of the duties set out herein.

8. Applicability

CLARA represents the interdisciplinary center of excellence focused on the next generation of artificial intelligence/machine learning applications and quantum-centric supercomputing which is built upon a strong consortium of partners. All Partners' Personnel working within the CLARA project and CLARA Personnel shall comply with this Policy and their internal policy of a partnership organization.

Provisions in this Ethical Codex are mandatory for INDRC as the CLARA coordinator. Other CLARA partners remain free to maintain their own codes, policies, standard-operating procedures and compliance frameworks and may adhere to their existing policies provided such policies demonstrate equivalent protection for the core ethical principles outlined in this Policy. Partners operating under equivalent policies shall be presumed to be in compliance with this Policy unless specific evidence of inadequate protection is identified. Partners are specifically not required to adopt provisions that conflict with their established frameworks, while they may voluntarily adopt additional provisions from this Policy that exceed their existing standards. All provisions remain subject to applicable legal regulations, which take precedence over both this Policy and partner policies in cases of conflict.















Conflict between a partner policy and this Policy (or between either of CLARA policies or applicable law) shall be notified to the Ethics & Security Manager in writing without undue delay. Notifications should contain: a clear description of the conflicting provisions; the practical circumstances in which the conflict arises; and any immediate risk to project timelines, deliverables or compliance.

Upon receipt of a notification, the Ethics & Security Manager shall conduct a preliminary assessment within ten (10) working days to determine: a) whether a real conflict exists; b) which policy has primacy under this section; and c) whether interim measures (e.g., suspension of the relevant activity or changes to the respective policies) shall take place.

For the purposes of ethical research - Ethics and professional conduct charter by PBI (available at https://parisbraininstitute.org/media/2655/download?inline=1) is recommended as best practice to follow.

9. Specific provisions

Following provisions are mandatory only to the CLARA Coordinator (INDRC and its personnel). Other CLARA Partners are encouraged to follow this recommended practice.

- INDRC Personnel must complete training pertaining to Ethical Conduct within six months of onboarding, with refresher training every two years.
- INDRC recognizes the value of giving back to the society and is committed to contribution via pro bono activities and volunteering. INDRC believes that those activities have a meaningful impact. Engaging in those activities might also support development of new skills of the Persons, broaden their social networks and enhance satisfaction in work. All volunteering activities to be taking place during their work hours must be communicated and approved by the INDRC Personnel's superior. Paid time off might be offered for such work, as agreed in an individual case, when the volunteering goal aligns with INDRC's values. There will be no research activity on human volunteers/patients.
- The Ethics & Security Manager shall, inter alia:
 - Ethical Assessment design, maintain and operate a pre-implementation ethics-review workflow for every research activity and joint-research proposal conducted under the umbrellas of INDRC;
 - Continuous Monitoring supervise ongoing projects to verify continued compliance with approved ethical conditions, applicable legislation and this Policy
 - European Commission Liaison identify, catalogue and address any ethics requirements raised by the European Commission (EC) or its appointed reviewers in the context of EC-funded projects, prepare formal responses and ensure implementation of resulting obligations;
 - Classification & Dissemination Control verify that no classified foreground information is generated and that all documents, deliverables and materials are correctly designated PU (Public – fully open) or SEN (Sensitive – limited under the conditions of the Grant Agreement); maintain the register of such designations;
 - Misuse-Prevention Assurance perform systematic risk assessments to confirm that no foreseeable potential for misuse of generated results exists, and recommend mitigation measures if new risks emerge;
 - Training & Awareness develop and deliver mandatory induction and refresher courses for all INDRC Personnel and CLARA team on ethical conduct, information-security obligations and this Policy;
 - Advisory & Help-Desk Function provide confidential advice to INDRC Personnel on ethical dilemmas, conflicts-of-interest disclosures, data-protection queries and responsible-research practices;
 - Incident Management receive, investigate and document allegations or indications of unethical or inappropriate behavior, breaches of this Policy or European Commission ethics conditions, and recommend corrective and disciplinary actions as appropriate;















- Record-Keeping maintain secure, auditable records of ethics reviews, approvals, incident reports and communications with oversight bodies, subject to confidentiality requirements, for the duration of the project and for 5 years after the termination of the project;
- Annual Reporting submit an annual written report to the CLARA Director detailing activities carried
 out, findings, recommendations and an evaluation of the overall ethical culture within CLARA.
- Develop and provide Integrated Training Curriculum on Research Ethics, Data Protection, and Responsible Innovation in Interdisciplinary Science. This training program equips CLARA-affiliated researchers with the ethical, legal, and technical knowledge required to:
 - Uphold research integrity and ethical publication practices
 - Ensure compliance with GDPR, cybersecurity standards, and Al laws
 - Implement conflict of interest management, environmental responsibility, and digital humanism principles
 - Prepare for internal audits, public scrutiny, and policy alignment with the EU Al Act, EU
 Green Deal, and OECD standards
- Depending on the intensity of breach of this Policy and also legal context of such breach, respective action, remedial mechanisms and potentially sanctions will follow. Minor breaches of this Policy shall result in issuing a verbal warning which is carried out via a discussion led by the INDRC Personnel's superior, CLARA Director or INDRC Director, as applicable, reminding on and emphasizing the fundamental principles, their importance and appropriate conduct as per this Policy. Breaches of a higher than minor intensity or repetitive minor breaches shall be followed by a formal written warning informing on the possibility of employment termination, i.e. the warning letter in the sense of provision of section 52 letter g) of the Act No. 262/2006 Coll., the Labor Code, as amended. Breach of a severe intensity could be viewed as a misdemeanour or even as a criminal offence and those types of breaches are to be notified to and decided by the respective public authority bodies.











