



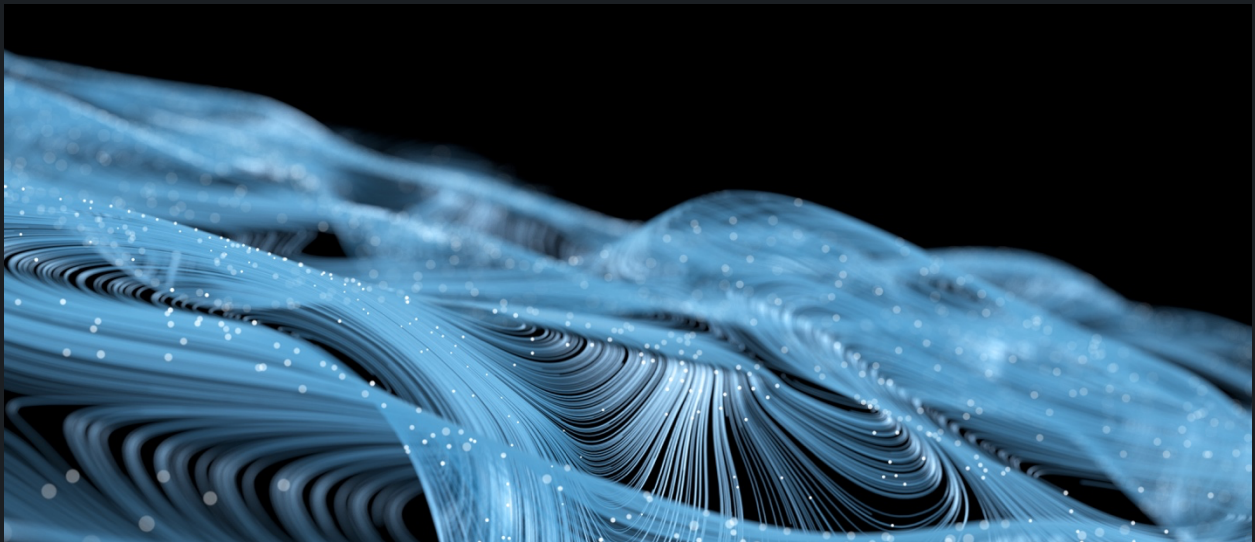
Transparency Disclosure

A Step-by-Step Guide

Presented by the Open Ethics Initiative

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What is a Transparency Disclosure?

Disclosure offers a transparent view inside a digital product. It describes how an autonomous system was built & its intended function in a standardized way, which can be easily understood by both the end-users and the other autonomous systems.

The disclosure can best be defined through its analogy to the food industry. Just like a nutrition label provides information on different properties of a specific food (ingredients, calories, nutrients, additives, allergens, sell-by date etc.), the transparency disclosure is the process that aims to provide information on the key pillars of a digital product:

To Follow through with the analogy, the FDA (Food & Drug Administration) uses nutrition labels to ensure food safety and quality & to protect the consumers from false advertising, while Open Ethics Initiative uses their own nutrition label for autonomous systems, called the Open Ethics Label, to ensure that digital and, primarily, AI-powered products are transparent & safe for the consumers.

While Open Ethics Label has the word “Label” in its name, the products that underwent disclosure are not labeled as “safe” or “ethical”, but they obtain the technical means for further labeling or certification by the third parties thanks to the standardized process. The technical documentation of how disclosure is generated, validated, and verified is discussed and published under [Open Ethics Transparency Protocol](#).

On the Importance of Transparency

Before diving into the specifics of generating the Open Ethics Label, it is important to talk about transparency.

Understanding why it is needed, how it benefits organizations, and the role of self-disclosure in shaping AI's future will help pave the way for more responsible and trustworthy AI systems.

Artificial Intelligence (AI) systems are increasingly integrated into essential decision-making processes across various sectors, including healthcare, finance, security, public administration, etc. However, their complexity and opacity pose significant challenges in ensuring accountability, fairness, and compliance with regulatory frameworks. Transparency in AI is the starting point. It's the biggest principle to foster trust, mitigate risks, and align with evolving global legal standards.

In the European Union, the Artificial Intelligence Act (EU AI Act) and the General Data Protection Regulation (GDPR) serve as cornerstone regulations emphasizing transparency in AI systems. The EU AI Act establishes obligations for organizations using or providing AI systems, requiring documentation on training data, decision-making processes, and algorithmic logic. Meanwhile, the GDPR mandates transparency in the processing of personal data, including requirements for explainability, informed consent, and the right to meaningful information about automated decision-making (Article 22 GDPR).

Beyond the EU, other jurisdictions such as Canada and the United Kingdom are developing AI regulatory frameworks that increasingly converge towards the principle of algorithmic transparency. Technical Standards developed by bodies such as ISO (International Organization for Standardization), IETF (Internet Engineering Task Force), and IEEE (Institute of Electrical and Electronics Engineers) also play a role in shaping best practices for AI governance.

Given this regulatory landscape, transparency through self-disclosure becomes not only a legal imperative but also a strategic advantage. Organizations that proactively disclose information about their AI systems can benefit in multiple ways:

1. **Enhanced Trust:** Transparency builds credibility between organizations and stakeholders, including clients, regulators, and the general public, ultimately fostering trust in AI-driven systems.
2. **Informed Decision-Making:** By providing clear insights into training data, algorithms, and decision-making processes, transparency empowers users to make informed choices about digital products.
3. **Regulatory Compliance:** Voluntary self-disclosure facilitates smoother alignment with both existing and emerging regulations on AI and autonomous systems.
4. **Market Differentiation & Enhanced Reputation:** Transparency can serve as a unique selling point, setting organizations apart in competitive markets while also granting them greater influence in AI policy development, and collaborative innovation.
5. **Ethical Leadership:** Openness fosters stronger engagement with stakeholders, including investors, partners, and the broader public, positioning organizations as ethical leaders in AI.

What is the Open Ethics Label?

The Open Ethics Label is a digital disclosure tool designed to help product owners and developers communicate transparency in AI systems effectively. It allows organizations to generate a structured, verifiable machine-readable transparency report in a standardized JSON format, along with an embeddable HTML code that can be displayed publicly.

At its core, the Transparency Disclosure is a structured overview of an autonomous system, detailing key aspects such as:

1. Training Data - General insights into training data sources and dataset collection methods.
2. Algorithms - High-level information on how AI models have utilized existing codebases or relied on proprietary ones.
3. Decision Space - Scope and limitations of AI-driven outputs.

In addition, important safety measures and processing approaches could be disclosed to communicate how the data is obtained, processed, and stored.

While the Transparency Disclosure serves as a detailed self-assessment to build trust and demonstrate compliance with regulations like the EU AI Act and GDPR, the Open Ethics Label transforms this information into a machine-readable, verifiable format that can be shared publicly if your organization wants to.

By adopting the Open Ethics Label, companies can enhance credibility, facilitate regulatory alignment, and offer clear AI transparency without exposing proprietary information.

What are the Benefits of the Open Ethics Label?

The Open Ethics Label is a voluntary transparency tool that benefits both consumers and AI system providers by enhancing trust and facilitating regulatory compliance.

Benefits for Consumers

- **Informed Decision-Making:** Transparency empowers consumers by providing access to key information on how AI systems function and process data. This provision of information is already a legal obligation for companies, as foreseen in the GDPR and the EU AI Act.
- **Increased Trust and Safety:** Knowing that a product adheres to ethical AI principles encourages trust in AI-based services and technologies.
- **Protection of Fundamental Rights:** Consumers benefit from disclosures that ensure alignment with legal rights related to data protection and algorithmic fairness.

Benefits for AI System Providers

- **Regulatory Readiness:** The Open Ethics Label helps providers align with the EU AI Act, GDPR, and other regulatory frameworks by encouraging structured disclosures that comply with these legislations.
- **Market Differentiation:** Companies that proactively disclose AI system information gain a competitive edge by demonstrating ethical leadership.
- **Risk Mitigation:** Transparency reduces legal and reputational risks by ensuring accountability and proactive and preventive compliance with emerging AI regulations.

What are the Steps to Generate the Open Ethics Label?

Once you and your team have internal alignment on what elements of your system's design and functionality should be made transparent to the public, you are ready to do the disclosure. These are the key steps of the disclosure process.

1. Open the form:
The form could be filled either through a website of Open Ethics Network Partners or via the Open Ethics website <https://openethics.ai/label/generate/>.
2. Fill in the basic product information:
Filling in the basic information such as Product URL & Contact Email is important as it gives way for consumers to use the correct contact details and keep track of the disclosure ownership and timing.
3. Fill in the core Disclosure elements:
Here the product owner will provide information on the key elements for the AI product disclosure: Training Data, Algorithms, and Decision Space.
4. The response:
After submitting the form you will receive a response containing the status of the submission and the snapshot of the submitted information:
 - a. the manifest file (transparency.json), a machine-readable JSON file containing the disclosure,
 - b. and an HTML code: a set of standard Open Ethics Label icons reflecting what you disclosed that you can then voluntarily display on your organization's website by embedding the HTML code from the file (oel.html).

What should I think about when I disclose information about my digital product?

The Open Ethics Label backend processes your disclosure and generates JSON-based manifest, allowing for structured, machine-readable AI system documentation. While the JSON format itself does not impose legal obligations, organizations should ensure that:

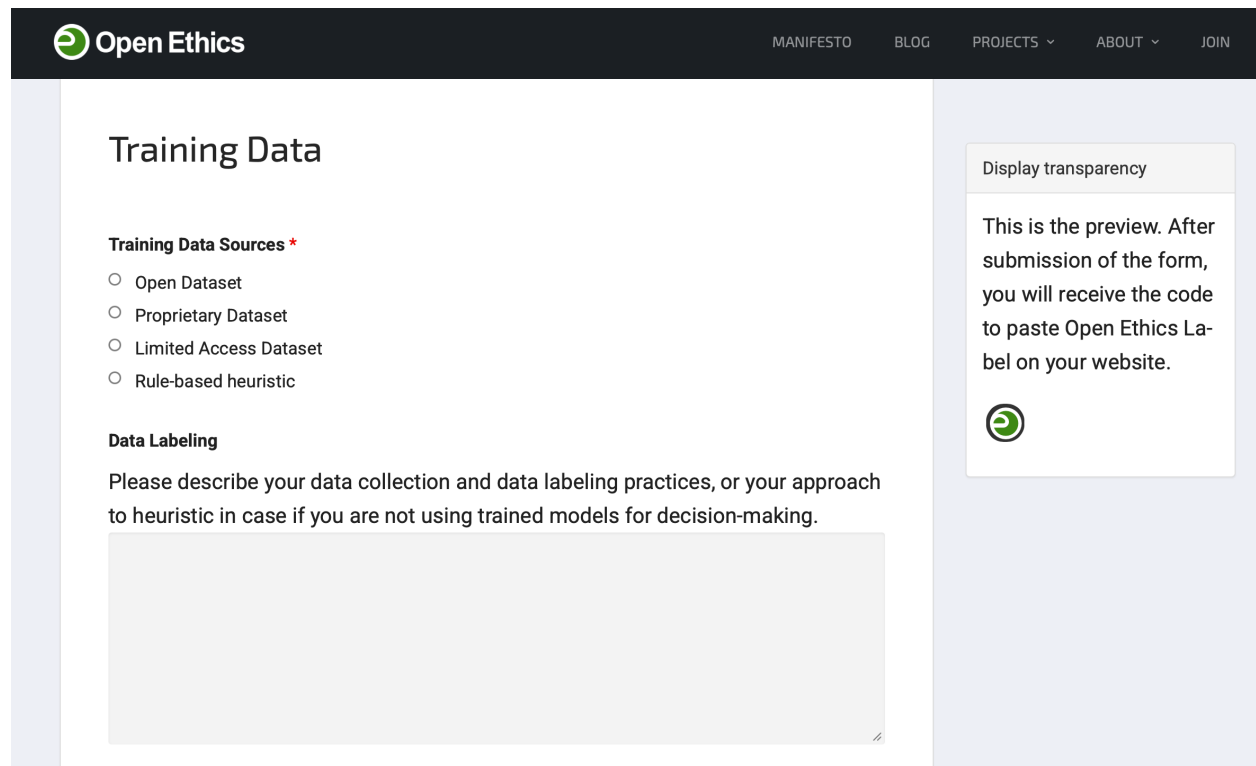
- **Data Protection Measures:** JSON files contain information that you disclose. Not more, not less. Once you have completed the disclosure and obtained the manifest file, double check it to make sure you are ready to make it public.
- **Accessibility:** Transparency information must be easily understandable for regulators and for the end-users.
- **Legal Vetting:** Companies should consult legal experts to verify that their Transparency Disclosures satisfy jurisdiction-specific compliance needs as well as the corporate policy.

How do I fill in the self-disclosure form?

Part I – Training Data

Machines learn from data. They find relationships, develop understanding, help in making decisions, and evaluate their confidence levels from the training data they are using. And the better the training data is, the better the machine learning model performs.

Providing information about sources of your data may help to identify possible inherent bias and make sure the model is used within its scope of application. When choices are made based on rules or any heuristic, disclosing them can help spot foreseeable problems on the go. Having clear information about your training data also promotes accountability.



The screenshot shows the 'Training Data' section of the Open Ethics self-disclosure form. The header includes the Open Ethics logo and navigation links: MANIFESTO, BLOG, PROJECTS, ABOUT, and JOIN. The main content area is titled 'Training Data' and contains two sections: 'Training Data Sources' and 'Data Labeling'. The 'Training Data Sources' section has four radio button options: 'Open Dataset', 'Proprietary Dataset', 'Limited Access Dataset', and 'Rule-based heuristic'. The 'Data Labeling' section has a text input area with a placeholder text: 'Please describe your data collection and data labeling practices, or your approach to heuristic in case if you are not using trained models for decision-making.' On the right side, there is a 'Display transparency' button and a preview box containing the text: 'This is the preview. After submission of the form, you will receive the code to paste Open Ethics Label on your website.' Below the preview box is the Open Ethics logo.

FAQ & Recommendations

What level of transparency is right for my company?

Transparency does not mean full exposure—it means strategic openness.

We understand that companies are concerned about protecting their intellectual property, trade secrets, and proprietary algorithms. The Open Ethics Transparency Protocol and the Open Ethics Label tool are designed to provide flexibility, allowing you to share only the information that is necessary to build trust and demonstrate responsible AI practices, without revealing confidential business details.

To determine the right balance, we recommend an internal assessment with your team to establish clear transparency boundaries.

Consider:

- What aspects of your AI system are essential for users and regulators to understand?
- What is the unintended use of your system and disclosure of which elements could help to prevent such unintended use?
- What information can enhance trust and compliance without compromising competitiveness?
- Which elements are critical to demonstrate fairness, reliability, and responsible AI usage?

The Transparency Disclosure is not an all-or-nothing approach, it is a structuring tool that allows you to choose the level of disclosure that aligns with your business model, legal obligations, and ethical commitments.

Our framework provides guidelines on how to present key transparency elements while ensuring that sensitive and proprietary data remains confidential without undermining your organization's competitive edge.

By adopting a controlled transparency strategy, companies can gain competitive advantage, strengthen trust with stakeholders, and demonstrate proactive compliance with AI regulations, such as the EU AI Act and GDPR.

What details should I provide to ensure responsible transparency?

After setting your transparency boundaries internally, you can use these questions & examples to help you with the disclosure:

- What is your data labeling approach?
- What are the methods of acquisition you use?

- Do you use any data-labeling tools or platforms?

The disclosure can also contain information on data labelers, QA, data privacy compliance. You can mention how you ensure consistency across labels, if you have any annotation guidelines and best practices etc.

These are only examples to expand on what the disclosure can contain. For a bigger picture conversation on transparency, you can also use the [Open Ethics Canvas](#). The tool was created to help you and your team not only set the transparency boundaries prior to the disclosure, but also with the process of building transparent and explainable tech products.

Is there any specific way to disclose?

No. We just recommend using clear language.

How does the Open Ethics Label align with the AI Act & GDPR requirements?

The EU AI Act mandates transparency obligations for AI developers, especially those offering high-risk AI applications. The Open Ethics Label facilitates compliance by encouraging structured documentation for the training datasets, application logic, and risk mitigation measures. Similarly, the GDPR requires that AI-driven decision-making processes be explainable when they involve personal data. The Label aids in fulfilling transparency obligations by providing end-users with structured disclosures.

What are the penalties for non-compliance with EU transparency regulations?

Under the EU AI Act, non-compliance with transparency obligations can lead to fines of up to €30 million or 6% of global annual turnover, whichever is higher. The GDPR imposes penalties of up to €20 million or 4% of global annual revenue for violations of transparency, data subject rights, or automated decision-making rules.

How does the Open Ethics Label help organizations comply with the EU AI Act and GDPR?

The Transparency Disclosure supports organizations by:

- Providing structured transparency templates aligned with regulatory expectations.
- Enhancing data governance practices through documentation of AI decision-making.
- Facilitating compliance audits by offering machine-readable records of AI system attributes.

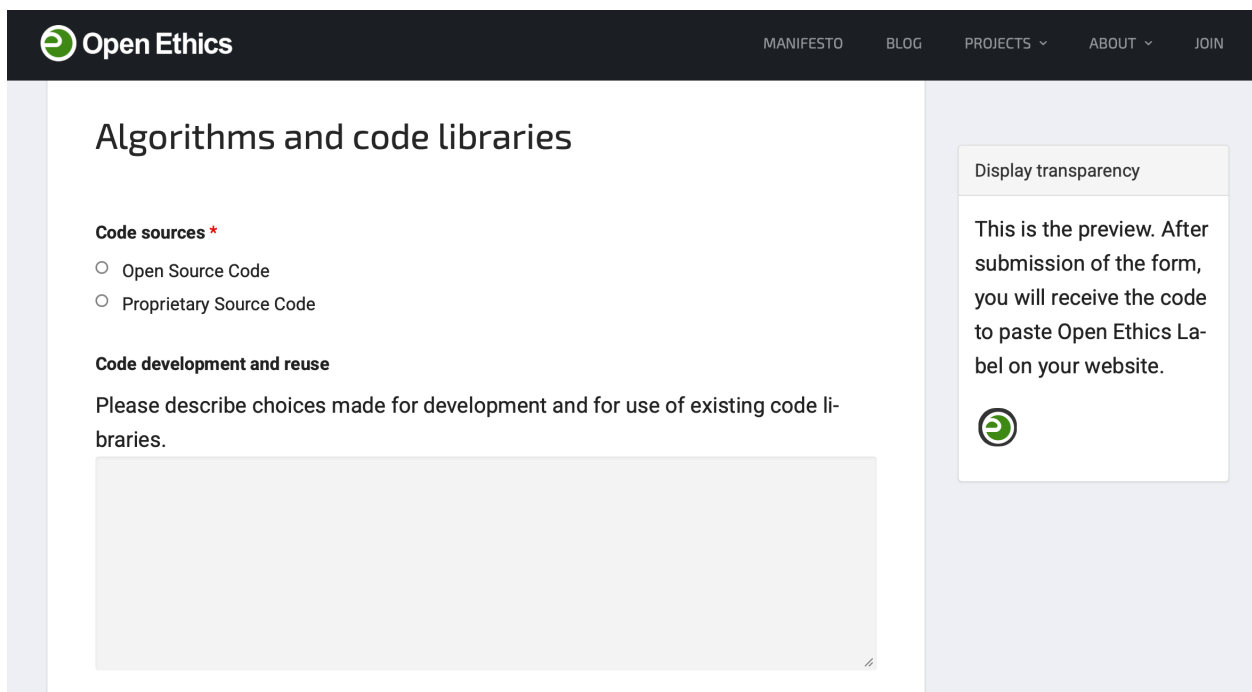
The Open Ethics provides tools to enhance transparency in AI systems. However, Open Ethics does not guarantee that the use of the tools ensures full compliance with the EU AI Act, GDPR, or any other applicable law. Regulatory compliance depends on the specific legal framework applicable to each AI system and requires a case-by-case legal assessment by a qualified

attorney. Open Ethics disclaims any liability for legal disputes, regulatory fines, or third-party claims arising from non-compliance with transparency or technology governance laws.

Part II – Source Code

Part two of the Transparency Disclosure is to provide information about the Source Code.

Source code can be proprietary or open, and licensing agreements often reflect this distinction. Access to source code allows programmers and skilled users to contribute to the solution. Providing information about algorithmic choices is a way to evaluate privacy and security risks associated with the application logic, as well as to judge on the relevance of the used tooling.



The screenshot shows a web form titled "Algorithms and code libraries" on the Open Ethics website. The form is divided into two main sections. The first section, "Code sources", has a red asterisk and two radio button options: "Open Source Code" and "Proprietary Source Code". The second section, "Code development and reuse", contains a text prompt: "Please describe choices made for development and for use of existing code libraries." Below this prompt is a large, empty text area for input. On the right side of the form, there is a "Display transparency" button. Below the button, a preview box shows the text: "This is the preview. After submission of the form, you will receive the code to paste Open Ethics Label on your website." followed by the Open Ethics logo.

Algorithms and code libraries

Code sources *

- ☐ Open Source Code
- ☐ Proprietary Source Code

Code development and reuse

Please describe choices made for development and for use of existing code libraries.

Display transparency

This is the preview. After submission of the form, you will receive the code to paste Open Ethics Label on your website.



FAQ & Recommendations

What if my digital product uses both open-source & proprietary code?

To preserve the specific & undiluted aspect of the disclosure, we recommend you tick the box that encompasses what you primarily use as a source code for your digital product.

Let's take for instance a product owner of an AI model. The model was built mainly on proprietary code and has some components built using open-source libraries.

Will the product owner check the?

- Open-source code /
- Proprietary source code?

Due to the fact that the core functionality was built on proprietary code, the product owner will check the proprietary source code box, unless the product owner has already published the code under the open-source license, as well as training data and the documentation to allow full reproducibility.

To disclose or not to disclose... that is the question.

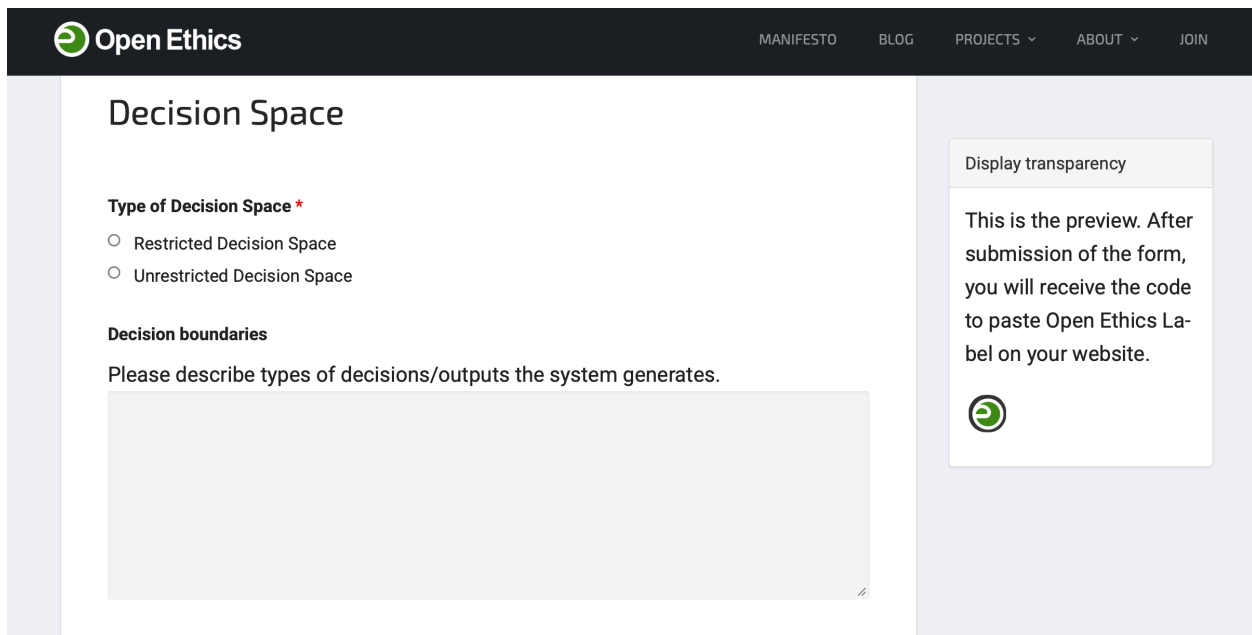
The first step can be as easy as to disclose the use of an algorithm for the visibility of information conveyed about your system. Based on your transparency boundaries, you can use a white, grey, or black box approach to selectively disclose, while protecting sensitive information.

The black box approach remains on a shallow level of disclosure and focuses on offering high-level descriptions on functionality & performance metrics, while the white box approach is at the opposite end. The grey box approach can be seen as a middle-ground, where you can provide information on inputs & outputs, logic, general methodologies etc., while still protecting trade secrets and the code itself.

Part III – Decision Space

The 3rd Part of the Disclosure is the Decision Space.

Machines don't make decisions, humans do. However, software supply chains could be put together by humans too for decision-making automation. The decision space is the set of all possible outputs that the system can make. Disclosing the decision space is about setting expectations, so that each user or an autonomous agent knows what to expect as a result. Providing information about typology of outputs allows to ensure robustness and safety for complex solutions which involve chaining of components from multiple software vendors, including the ones providing machine-learning-based products.



The screenshot shows the 'Decision Space' section of the Open Ethics disclosure form. The header bar is dark with the Open Ethics logo and navigation links: MANIFESTO, BLOG, PROJECTS, ABOUT, and JOIN. The main content area has a light blue background. On the left, the title 'Decision Space' is followed by a form section. The first section is 'Type of Decision Space' with a red asterisk, containing two radio button options: 'Restricted Decision Space' and 'Unrestricted Decision Space'. Below this is the 'Decision boundaries' section, which includes a text prompt 'Please describe types of decisions/outputs the system generates.' and a large, empty light gray text area. On the right side of the form, there is a 'Display transparency' button. Below the button is a preview box containing the text: 'This is the preview. After submission of the form, you will receive the code to paste Open Ethics Label on your website.' and the Open Ethics logo.

FAQ & Recommendations

What is a Restricted Decision Space?

The Decision Space is called “Restricted”, when the set of AI model outputs is known and predefined. Let’s take for example a traffic light. Its decision space is a set of states that it exhibits, such as Green, Yellow, Red, blinking Yellow, and Not working at all. The traffic light has a Restricted Decision Space.

What is an Unrestricted Decision Space?

The Decision Space is unrestricted when the set of AI model outputs is not limited (e.g. when either the type of output is not predicted or the output itself is generated by the model).

What can I disclose here?

It is important to provide explanations for the AI model outputs in a clear way. You can explain in plain language how the model weighs different factors. Information on what influences the model output such as relevant features of the model (feature importance), model objectives, assumptions, limitations, uncertainties, logical rules etc. are some of the elements you can focus on.

Annex: Processing Approaches

The optional element of the Disclosure is represented by the Processing Approaches.

Describe your data processing approaches, such as processing and retention of the Personal Data, Sources to external resources such as code, model description, and legal notices, provide clarity on output validation techniques including Human-in-the-Loop.

Processing Approaches

Describe your data processing approaches, such as processing and retention of the Personal Data, Sources to external resources such as code, model description, and legal notices, provide clarity on output validation techniques including Human-in-the-Loop.

Personal Data Record

Account ID

Source of the data record

permaner

Purpose of the data record processing

☐ Consent obtained directly

☐ Identifying record

Human-in-the-Loop component

AI swarm + Human

Humans confirm

HITL design objective

Source

Privacy Policy

<https://example.com/privacy>

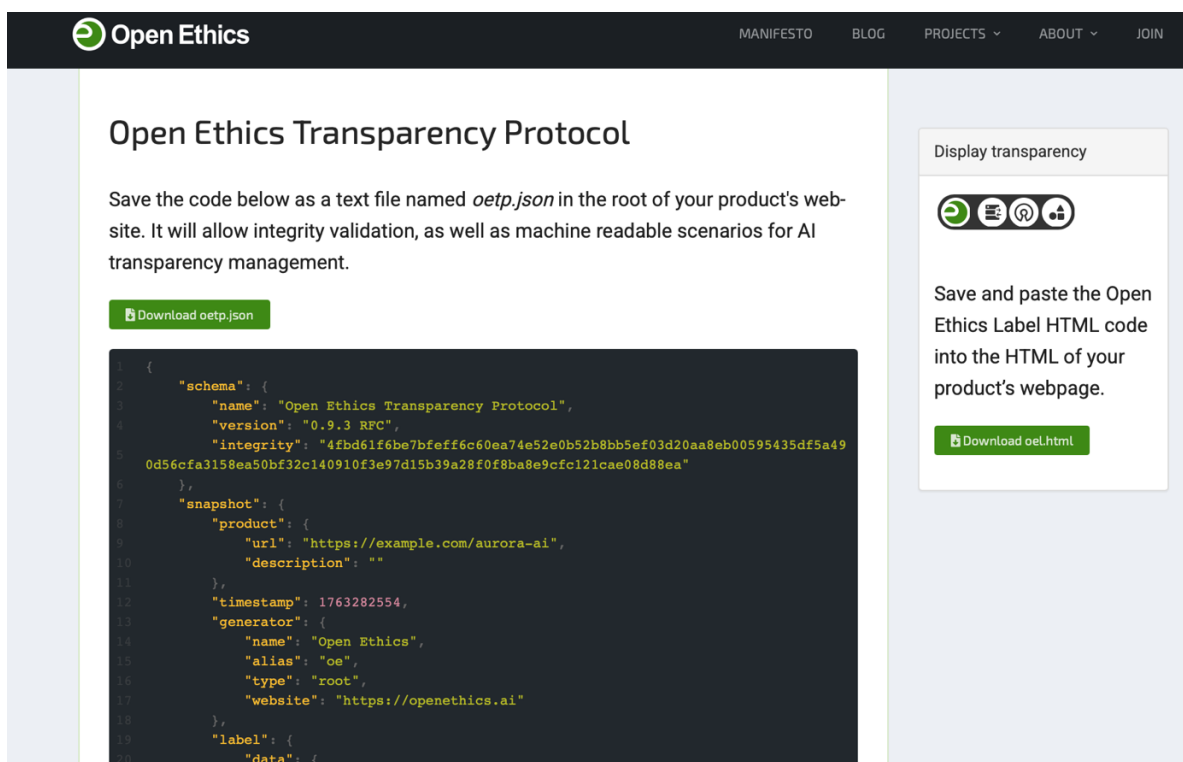
Add comments

+ Personal Data Record

Behind the scenes

After completing the Transparency Disclosure & submitting it, the manifest will be generated. This is what happens behind the scenes:

- Open Ethics receives the submission and adds a timestamp to it;
- Open Ethics issues a SHA3-512 cryptographic signature on submitted data;
- Open Ethics generates a machine-readable JSON file that follows the scheme of the [Open Ethics Transparency Protocol](#);
- Open Ethics generates embeddable HTML code with the Open Ethics Label.



The screenshot shows the Open Ethics Transparency Protocol page. The header includes the Open Ethics logo and navigation links: MANIFESTO, BLOG, PROJECTS, ABOUT, and JOIN. The main heading is "Open Ethics Transparency Protocol". Below it, a paragraph explains that users should save the code as a text file named *oetp.json* in the root of their product's website for integrity validation and machine-readable scenarios for AI transparency management. A green button labeled "Download oetp.json" is provided. Below the button is a code block containing a JSON manifest. To the right, a sidebar titled "Display transparency" shows the Open Ethics Label HTML code and a green button labeled "Download oel.html".

Open Ethics

MANIFESTO BLOG PROJECTS ABOUT JOIN

Open Ethics Transparency Protocol

Save the code below as a text file named *oetp.json* in the root of your product's website. It will allow integrity validation, as well as machine readable scenarios for AI transparency management.

[Download oetp.json](#)

```
1 {
2   "schema": {
3     "name": "Open Ethics Transparency Protocol",
4     "version": "0.9.3 RFC",
5     "integrity": "4fbd61f6be7bfeff6c60ea74e52e0b52b8bb5ef03d20aa8eb00595435df5a49
6     0d56cfa3158ea50bf32c140910f3e97d15b39a28f0f8ba8e9cfc121cae08d88ea"
7   },
8   "snapshot": {
9     "product": {
10      "url": "https://example.com/aurora-ai",
11      "description": ""
12    },
13    "timestamp": 1763282554,
14    "generator": {
15      "name": "Open Ethics",
16      "alias": "oe",
17      "type": "root",
18      "website": "https://openethics.ai"
19    },
20    "label": {
21      "data": {
```

Display transparency



Save and paste the Open Ethics Label HTML code into the HTML of your product's webpage.

[Download oel.html](#)

Congratulations! You generated the Open Ethics Label.

After filling in the disclosure form of your digital product, you will receive the copy of submitted data by email.

The web page will display button to download the manifest file (transparency.json) which contains the machine-readable JSON file with the content of disclosure. You will also be able to download the automatically generated HTML code with the visual representation of the disclosure. You can paste the HTML code on your website with zero effort.

This is an example of how the Open Ethics Label iframe looks like:



Transparency in AI is not just a legal requirement—it is a fundamental principle that fosters trust, accountability, and responsible innovation. The Open Ethics Label and Transparency Disclosure framework provide valuable tools to enhance transparency in AI systems, supporting compliance with global AI regulations. However, organizations must undertake continuous compliance efforts, leveraging legal expertise to ensure that transparency obligations align with evolving regulatory landscapes.

Generate your Open Ethics Label [here](#).

Additional Questions

What is the difference between Transparency Disclosure and Open Ethics Label?

The Transparency Disclosure is a detailed self-disclosure document that describes how an AI system works, including its training data, algorithms, decision-making space, and processing approaches. It helps companies voluntarily share key information about their AI products to build trust and align with regulations like the EU AI Act and GDPR.

The Open Ethics Label, on the other hand, is a machine-readable verification tool that transforms this disclosure into a structured JSON file and an embeddable HTML code. It provides digital verification and allows organizations to publicly display their commitment to transparency.

Who can generate a label?

Any provider/deployer of a digital product.

Why should a product owner generate a label?

While the label is completely voluntary, it brings the standard of self-disclosure to digital products, to make them transparent and safe for consumers.

The label Facilitates (ex-ante) understanding of the values and risks the product carries and it translates a machine-readable Transparency Disclosure into a set of recognizable icons and marks.

As a result, the consumers can make an informed choice based on the Open Ethics Label displayed on your website.

How is the Open Ethics Label different than others?

Open Ethics Label represents the commitment of the product owner to transparency towards their users. The Open Ethics Label is the direct and verifiable reflection of what was made public in the process of self-disclosure and it includes details such as approach to algorithmic and data transparency as well as safety precautions when it comes to modulating the system's output.

I generated the Open Ethics Label. Now what?

Do not worry! Transparency consists in more than one layer. If you would like to continue your journey in transparency, you can head to the Data Passport & go one layer deeper. Discover how to disclose information on the origins of data, on how your dataset was constructed & your system was built.



Improving AI Transparency

Contact Us

If you have any questions, require further assistance with the disclosure, or would like to provide any feedback to improve the Open Ethics Label, contact us below:

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