

Ethical AI Frameworks for Responsible Internal Auditing Practices: A Conceptual and Theoretical Framework

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ABSTRACT

The accelerating integration of Artificial Intelligence (AI) into internal auditing is reshaping assurance practices through continuous auditing, advanced analytics, and predictive risk assessment. While AI enhances audit efficiency, coverage, and timeliness, it also introduces significant ethical, accountability, and governance challenges, including algorithmic opacity, data bias, privacy risks, and the potential erosion of professional judgment. Addressing these issues is essential for preserving audit integrity and stakeholder trust in increasingly automated audit environments. This study adopts a conceptual and theory-driven approach, drawing on Stakeholder Theory, Ethical Decision-Making Theory, and Technology Governance Theory. Through a systematic synthesis of academic literature, professional auditing standards, and global ethical AI guidelines, the paper develops the Ethical AI Audit Framework (EAAF). The framework embeds core ethical principles—transparency, fairness, accountability, explainability, privacy, and integrity—across the internal audit lifecycle, from planning to follow-up. The EAAF emphasizes “human-in-command” oversight, highlights governance enablers such as ethical review mechanisms and bias audits, and identifies auditor competence as central to ethical AI outcomes. This study contributes a domain-specific ethical governance model to support responsible, transparent, and trustworthy AI-enabled internal auditing.

Keywords: Artificial Intelligence, Internal Auditing, Ethics, Accountability, Governance Framework

INTRODUCTION

The accelerating digital revolution has significantly reshaped both the operational and strategic dimensions of internal auditing. Artificial Intelligence (AI)—including machine learning (ML), natural language processing (NLP), and predictive analytics—has transformed how auditors collect, analyze, and interpret evidence. Contemporary internal audit functions increasingly rely on intelligent systems capable of detecting anomalies, assessing internal controls, and evaluating risks in real time (Brown-Libur, Issa, & Lombardi, 2021). As organizations integrate AI-driven tools to enhance assurance quality, speed, and precision, concerns regarding ethical responsibility, transparency, and accountability have become more pronounced (Kokina & Davenport, 2017).

According to the Institute of Internal Auditors (IIA, 2023), internal auditing is “an independent, objective assurance and consulting activity designed to add value and improve an organization’s operations.” This definition underscores ethical principles such as integrity, objectivity, and due professional care—principles that may be challenged when audit judgments are supported or substituted by algorithmic decision-making. Consequently, the ethical integration of AI is not solely a technological requirement but a fundamental governance and moral obligation.

Although research on AI in auditing has expanded rapidly, a clear conceptual structure for embedding ethical principles throughout the AI-enabled audit lifecycle remains lacking. Existing studies have largely focused on efficiency and automation while neglecting ethical risks such as biased datasets, opaque algorithmic logic, and ambiguous accountability for AI-generated audit outcomes (Luo et al., 2022). As organizations transition toward intelligent auditing ecosystems, the absence of a structured ethical framework may undermine audit credibility, stakeholder trust, and adherence to professional standards.

To address this gap, this paper proposes the Ethical AI Audit Framework (EAAF), a theoretical and ethical foundation designed to guide auditors, organizations, and regulators in adopting responsible and transparent AI across all phases of the internal audit process.

Objective of the Study:

The objectives framed for the present study are

1. To critically examine the ethical, professional, and governance challenges of AI adoption in internal auditing.
2. To develop a theoretically grounded Ethical AI Audit Framework (EAAF) by integrating Stakeholder, Ethical Decision-Making, and Technology Governance theories across the internal audit lifecycle.
3. To propose conceptual propositions and a future research agenda to support empirical validation, standard-setting, and policy development for responsible AI-enabled internal auditing.

RESEARCH METHODOLOGY:

This study employs a conceptual, theory-driven, non-empirical methodology to explore ethical AI adoption in internal auditing. Given the emergent nature of the topic and the limited availability of unified models, the research adopts a qualitative synthesis design to enable theory building.

A systematic and integrative literature review forms the empirical foundation, encompassing peer-reviewed journals in accounting, auditing, information systems, and AI ethics, alongside professional and policy documents from the IIA, IFAC, OECD, and the European Commission. This triangulated evidence base ensures analytical rigor and external validity.

Data were analysed through iterative abstraction and conceptual mapping, aligning ethical AI principles with audit lifecycle processes, governance enablers, and auditor competencies. Theoretical coherence was achieved through the integration of Stakeholder, Ethical Decision-Making, and Technology Governance theories, forming the foundation for constructing the Ethical AI Audit Framework (EAAF).

REVIEW OF LITERATURE

AI and Internal Auditing

The integration of AI into internal auditing represents a paradigm shift in assurance and governance. AI technologies enable auditors to process vast amounts of data, identify patterns, and detect anomalies far beyond human capacity (Yoon, Hoogduin, & Zhang, 2015). Applications range from predictive risk assessments and automated control testing to natural language-based audit documentation and fraud detection. Research indicates that AI-driven audit processes significantly enhance efficiency, reduce sampling errors, and improve coverage of complex transactions (Issa, Sun, & Vasarhelyi, 2016).

However, as AI becomes embedded in audit practices, auditors face challenges in understanding algorithmic behaviour and ensuring that system-generated outputs align with ethical and professional standards. The black-box nature of many machine learning models complicates the auditor's ability to interpret, validate, and explain audit evidence (Lombardi, Bloch, & Vasarhelyi, 2022). This opacity raises ethical concerns regarding accountability for errors or bias arising from automated systems.

Moreover, the IIA's (2023) competency frameworks emphasize that auditors must exercise due professional care and maintain independence. When audit judgments are derived from AI tools developed or maintained by third parties, ensuring independence and integrity becomes more complex. Hence, scholars argue for frameworks that ensure explainability, human oversight, and algorithmic governance in audit environments (Davenport & Kirby, 2021).

Ethical Dimensions of AI in Auditing

The ethical implications of AI in auditing extend beyond technical reliability to encompass fairness, privacy, transparency, and accountability. Algorithmic decisions, especially in areas such as fraud detection or control evaluation, can inadvertently introduce bias if training data are unrepresentative or reflect historical inequities (Mittelstadt et al., 2016). Ethical AI, therefore, requires proactive governance mechanisms to identify and mitigate bias at every stage of the audit process.

Auditing ethics traditionally rest on the principles of integrity, objectivity, confidentiality, and professional behaviour (IFAC, 2022). Integrating AI into audit functions demands reinterpretation of these principles in technological contexts. For instance, confidentiality must now account for data security and privacy risks inherent in AI-driven analytics. Similarly, objectivity requires auditors to critically evaluate algorithmic recommendations rather than accepting them unquestioningly (Luo et al., 2022).

Ethical AI frameworks, such as those proposed by the European Commission (2019) and the OECD (2021), highlight key principles—transparency, accountability, fairness, and human oversight—that align closely with professional auditing ethics. Yet, their adaptation to the internal auditing context remains limited. This paper aims to contextualize these global ethical standards into a domain-specific framework for internal auditing.

Existing Ethical AI Frameworks and Professional Standards

Global institutions have developed foundational ethical AI guidelines. The European Union’s Ethics Guidelines for Trustworthy AI (2019) outline seven key requirements: human agency, technical robustness, privacy, transparency, diversity, societal well-being, and accountability. The OECD AI Principles (2021) similarly emphasize fairness, interpretability, and governance mechanisms to ensure ethical outcomes.

In the auditing field, professional bodies like ICAEW (2021) and IFAC (2022) have begun addressing digital ethics through guidance on data analytics, cybersecurity, and AI adoption. However, their recommendations remain fragmented and largely descriptive rather than integrative.

Few academic models explicitly connect these ethical principles to the internal audit lifecycle—planning, evidence collection, evaluation, reporting, and follow-up. This gap underpins the need for a holistic conceptual model—one that not only embeds ethical AI principles within audit processes but also aligns them with governance, professional, and societal expectations.

Theoretical Foundations for Ethical AI in Internal Auditing:

Artificial Intelligence (AI) challenges the moral foundations of traditional auditing by redistributing judgment from human auditors to algorithms. To ensure that AI adoption in internal auditing remains ethically aligned and professionally accountable, a robust theoretical grounding is required. This section anchors the proposed Ethical AI Audit Framework (EAAF) in three complementary perspectives—Stakeholder Theory, Ethical Decision-Making Theory, and Technology Governance Theory—each providing a distinct but interlinked lens for interpreting responsible AI use in audit practice.

Stakeholder Theory: Embedding Ethical Accountability in Digital Assurance

Stakeholder Theory (Freeman, 1984) asserts that organizations bear moral obligations to a spectrum of stakeholders whose interests are influenced by corporate actions. In an AI-enabled audit environment, stakeholders extend beyond shareholders and management to include regulators, employees, customers, and the broader public who rely on transparent and unbiased financial information.

AI systems can significantly enhance audit quality; however, they also create new ethical vulnerabilities—such as algorithmic opacity and data bias—that may undermine stakeholder confidence. Embedding stakeholder considerations into AI governance compels auditors to design and deploy systems that are not only efficient but

also fair, explainable, and socially responsible. Thus, Stakeholder Theory provides the normative backbone of the EAAF, emphasizing inclusivity, transparency, and trust as guiding principles for AI-assisted auditing.

Ethical Decision-Making Theory: Preserving Auditor Moral Agency

Auditors have traditionally been viewed as moral agents who must exercise professional and ethical judgment. Rest's (1986) Ethical Decision-Making Theory delineates four cognitive stages—moral awareness, moral judgment, moral intent, and moral behaviour—that collectively explain how ethical decisions are formed. Within AI-augmented auditing, these stages translate as follows:

- ❖ *Ethical Awareness*: Identifying ethical risks inherent in algorithmic design, data selection, or automated decisions.
- ❖ *Moral Judgment*: Evaluating whether AI recommendations align with fairness, transparency, and independence.
- ❖ *Moral Intent*: Prioritizing ethical obligations over organizational pressures for speed or cost efficiency.
- ❖ *Moral Behavior*: Taking corrective actions or overriding AI outputs when ethical violations are detected.

This theoretical lens positions the auditor as a moral gatekeeper who supervises and validates AI decisions. Even when algorithms process evidence autonomously, ethical accountability ultimately rests with the human auditor. The EAAF therefore insists on maintaining “human-in-command” oversight, ensuring that technology amplifies—not replaces—moral reasoning within audit judgment.

Technology Governance Theory: Institutionalizing Responsible AI Oversight

Technology Governance Theory (Weill & Ross, 2004) focuses on how organizations distribute authority and accountability for technology decisions. Applied to internal auditing, it offers a framework for structuring ethical control over AI systems through defined policies, decision rights, and monitoring mechanisms. Key governance principles include:

- ❖ *Defined Accountability*: Assigning explicit responsibility for AI outputs and audit interpretations.
- ❖ *Data Stewardship*: Maintaining integrity, provenance, and confidentiality of datasets feeding AI analytics.
- ❖ *Oversight Architecture*: Establishing audit committees or ethics boards to evaluate AI performance and compliance.
- ❖ *Feedback Loops*: Continuously reviewing and updating AI models to reflect evolving ethical norms and regulations.

Technology governance ensures that ethical intentions are institutionalized rather than left to individual discretion. Within the EAAF, it serves as the structural pillar linking ethical principles with operational audit processes.

The Ethical AI Audit Framework (EAAF): A Conceptual Model for Responsible Assurance:

Framework Overview

Drawing from the above theories, the Ethical AI Audit Framework (EAAF) integrates moral philosophy, stakeholder accountability, and technological governance into the internal audit lifecycle. The model envisions auditing as an ethically regulated, technologically intelligent, and socially responsive system. It positions ethical AI principles as foundational inputs that guide all audit activities toward trustworthy outcomes.

The framework comprises five interdependent layers, forming a continuous ethical loop:

- ❖ Ethical AI Principles — Normative foundation
- ❖ Internal Audit Lifecycle Phases — Operational domain
- ❖ Governance Enablers — Institutional safeguards
- ❖ Professional Competence — Human capability layer
- ❖ Ethical Outcomes — Intended impact and trust generation

Each layer reinforces the others, ensuring that technological efficiency does not outpace ethical accountability.

Layer One – Ethical AI Principles: The Normative Compass

At its core, the EAAF is anchored in universally recognized ethical AI principles distilled from the EU (2019), OECD (2021), and IFAC (2022) guidelines:

- ❖ *Transparency*: Audit algorithms must be explainable and auditable by human experts.
- ❖ *Fairness*: Data selection and model training must avoid systemic bias or discrimination.
- ❖ *Accountability*: Responsibility for AI decisions remains explicitly assigned to human auditors.
- ❖ *Privacy and Confidentiality*: Data analytics must comply with privacy laws and professional secrecy.
- ❖ *Integrity*: All AI tools should reinforce, not compromise, the auditor’s objectivity and independence.

These principles act as the ethical DNA of AI-driven audit processes, directing system design and human oversight.

Layer Two – Integration across the Internal Audit Lifecycle

Table-2: Ethical considerations permeate every phase of the audit process

Audit Phase	Ethical Focus	AI Consideration
Planning	Evaluate ethical risks in algorithmic scope and data inputs.	Model validation and fairness assessment.
Fieldwork	Ensure informed human supervision during automated evidence collection.	Continuous monitoring of algorithmic performance.
Evaluation	Apply critical judgment to interpret AI outputs.	Explain ability and cross-verification of findings.
Reporting	Disclose AI usage, assumptions, and limitations transparently.	Responsible communication of results.
Follow-Up	Conduct ethical post-audits of AI system Behavior.	Continuous learning and ethical refinement.

Source: Author’s Conceptual Compilation (2025)

This integration transforms the audit lifecycle into a closed-loop ethical system—from ethical design to ethical feedback.

Layer Three – Governance Enablers: Building Institutional Ethics

Governance enablers operationalize moral principles through organizational infrastructure. The EAAF prescribes:

- ❖ AI Ethics Committees within audit functions to oversee algorithmic performance.
- ❖ Bias Audits of data models and decision logs to ensure fairness and compliance.
- ❖ Policy Charters that codify accountability for AI-based audit outcomes.
- ❖ Documentation Protocols ensuring transparency of data sources, model assumptions, and human interventions.

These enablers form the compliance backbone of ethical AI auditing, bridging theory with day-to-day practice.

Layer Four – Professional Competence: The Human-Technology Nexus

Ethical AI integration is contingent upon the auditor’s dual fluency in ethics and technology. Professional competence thus encompasses:

- ❖ *AI Literacy*: Understanding the logic and limitations of machine learning systems.
- ❖ *Ethical Reasoning*: Applying professional judgment to algorithmic recommendations.
- ❖ *Continuous Learning*: Updating knowledge as technology and ethical standards evolve.
- ❖ *Collaborative Oversight*: Engaging multidisciplinary teams combining data science and audit expertise.

This layer reinforces that the ethical quality of AI auditing ultimately depends on the ethical quality of auditors themselves.

Layer Five – Ethical Outcomes: Rebuilding Trust in the Digital Audit Era

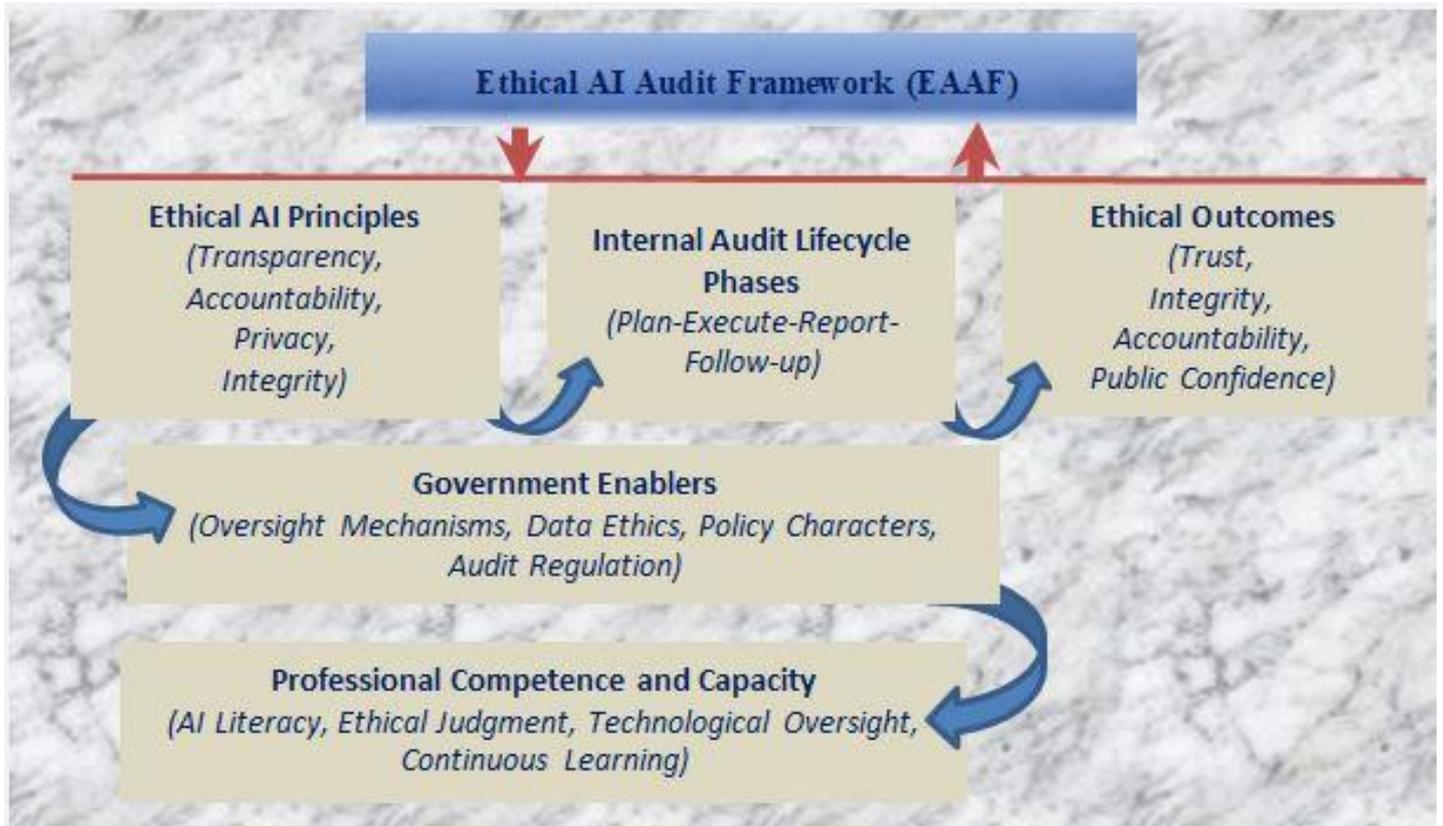
The culmination of the EAAF lies in producing ethical outcomes that reinforce stakeholder confidence and institutional legitimacy. Expected outcomes include:

- ❖ Enhanced Transparency and Trustworthiness in audit results.
- ❖ Improved Accountability through documented oversight and ethical traceability.
- ❖ Societal Confidence in the fairness and impartiality of AI-assisted assurance.
- ❖ Sustainable Integrity in organizational governance.

These outcomes reflect the ultimate test of responsible AI—its capacity to strengthen, not weaken, ethical assurance.

Visual Representation: Ethical AI Audit Framework (EAAF)

Figure-1: Ethical AI Audit Framework (EAAF)



Source: Author’s conceptualization (2025)

Figure 1 depicts the interlinked pathways among ethical principles, governance mechanisms, auditor competence, and audit lifecycle phases—all converging toward ethical outcomes of transparency, integrity, and accountability.

Conceptual Propositions

From the EAAF, the following testable propositions are articulated:

- ❖ **P1:** Embedding ethical AI principles within audit processes enhances the perceived fairness and transparency of audit outcomes.
- ❖ **P2:** Governance enablers strengthen the relationship between AI adoption and ethical audit compliance.
- ❖ **P3:** Auditor competence mediates the link between AI system design quality and audit integrity.
- ❖ **P4:** Organizations adopting holistic ethical AI frameworks exhibit higher stakeholder trust and reduced ethical risk.

These propositions provide fertile ground for future empirical research into responsible AI adoption in auditing.

DISCUSSION

The emergence of Artificial Intelligence (AI) within the audit function has redefined the boundaries of assurance, risk assessment, and governance. The proposed Ethical AI Audit Framework (EAAF) (see Figure 1) underscores the convergence between technological innovation and ethical accountability, a balance critical for sustaining trust in modern audit ecosystems. This discussion situates the EAAF within the broader context of audit transformation, exploring its theoretical, professional, and institutional implications.

Theoretical Implications

The EAAF aligns with the principles of agency theory, stakeholder theory, and institutional theory.

From an agency perspective, AI enhances the auditor's capacity to detect misstatements and mitigate information asymmetry between management and shareholders.

Stakeholder theory reinforces the auditor's expanded duty toward diverse interest groups—investors, regulators, and the public—requiring AI systems that prioritize fairness, explain ability, and accountability.

Institutional theory frames AI adoption as a legitimacy-seeking process: audit firms must conform to emerging norms of transparency, algorithmic ethics, and professional integrity to maintain credibility in the digital audit environment.

Professional Implications

For auditors, the integration of AI demands a paradigm shift from procedural compliance to judgment-based technological governance. The EAAF advocates for three dimensions of ethical competence:

- ❖ Technical Literacy – auditors must comprehend AI algorithms, data analytics, and system outputs;
- ❖ Ethical Literacy – professionals should identify, evaluate, and respond to biases and ethical risks inherent in automated systems;
- ❖ Regulatory Literacy – auditors must align AI use with standards like ISA 315 (revised), ISA 540, and evolving AI assurance frameworks.

Ethical auditing with AI transforms the auditor's role into a hybrid function—a fusion of data scientist, ethicist, and governance specialist. As ICAI and other professional bodies continue to revise standards, auditors' accountability will increasingly depend on their ability to ensure algorithmic transparency and data integrity.

Institutional and Regulatory Implications

Globally, regulators are moving toward tech-augmented oversight frameworks. The European Union's AI Act (2024), the OECD AI Principles, and India's National Strategy for AI (NITI Aayog) illustrate the trend toward ethical codification. In this context, the EAAF provides a conceptual roadmap for integrating ethical principles into audit practice, guiding regulators to:

- ❖ Define AI audit assurance standards that specify acceptable levels of bias, transparency, and explain ability;
- ❖ Establish AI audit registries to document algorithmic decisions affecting audit judgments; and
- ❖ Promote cross-sectoral collaboration between professional accountants, data scientists, and ethicists.

By embedding these elements, auditing transitions from a compliance-driven function to a value-driven ethical governance mechanism.

Research Agenda:

Despite growing literature on AI and auditing, empirical and conceptual gaps persist. To advance the field, future research can be structured around the following thematic agendas aligned with the Ethical AI Audit Framework (EAAF).

Table-2: Thematic Research Agenda Aligned with the EAAF

Thematic Area	Key Research Questions	Potential Methodologies
Algorithmic Accountability in Auditing	How can auditors assess and document the decision-making logic of AI tools?	Conceptual modelling; Delphi studies; design science
Ethical Risk Management	What ethical risks emerge from AI-assisted audit analytics, and how can they be mitigated?	Case studies; grounded theory; scenario analysis
Audit Quality and Bias Mitigation	How does AI-driven audit automation influence professional judgment and audit quality?	Experimental studies; behavioral audit research
Regulatory and Standard-Setting Perspectives	What institutional mechanisms ensure responsible AI adoption within auditing frameworks?	Policy analysis; comparative regulatory studies
Auditor Education and Competency Frameworks	What AI-related competencies are required for ethical auditing, and how can they be integrated into ICAI curricula?	Survey research; curriculum design evaluation
Explainable AI in Assurance	How can explainable AI enhance transparency and stakeholder trust in audit outcomes?	Algorithmic audit modelling; machine learning interpretability studies

Source: Author’s conceptual synthesis (2025)

Integrating AI Ethics into Auditing Pedagogy

Academic and professional training institutions should incorporate AI ethics modules within auditing syllabi. Case-based pedagogy, simulations, and collaborative labs can foster auditor competence in handling ethical dilemmas in AI use.

Future Empirical Models

Empirical validation of the EAAF could employ structural equation modelling (SEM) or system dynamics simulations to test causal links between ethical AI governance and audit effectiveness. These studies could further inform ICAI’s evolving Digital Audit Framework.

CONCLUSION

AI’s infusion into auditing represents both an opportunity and a moral test for the profession. While algorithmic tools enhance efficiency, predictive accuracy, and fraud detection, they simultaneously challenge traditional notions of professional judgment, independence, and responsibility. The Ethical AI Audit Framework (EAAF) proposed in this study provides a theoretical scaffold for integrating technological capability with ethical stewardship. The framework emphasizes that responsible auditing with AI is not merely about technological adoption but about fostering trust, transparency, and accountability in digital decision-making. The auditor of the future must act not only as an assessor of financial truth but also as a custodian of ethical intelligence ensuring that AI serves humanity’s collective interest rather than corporate expediency. Ultimately, the transition to ethical AI auditing will depend on institutional reform, standard evolution, and interdisciplinary collaboration.

As ICAI and global regulators move toward integrating AI into auditing standards, conceptual frameworks like EAAF will play a pivotal role in shaping the next generation of audit ethics and reinforcing the credibility of the profession in an era defined by intelligent automation.

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