

MANUAL FOR THE USE OF THE WHISTLEBLOWING CHANNEL

**plain
concepts** 

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Using the PLAIN CONCEPTS Ethical Channel is simple. Below, we will help you understand the process by explaining it.

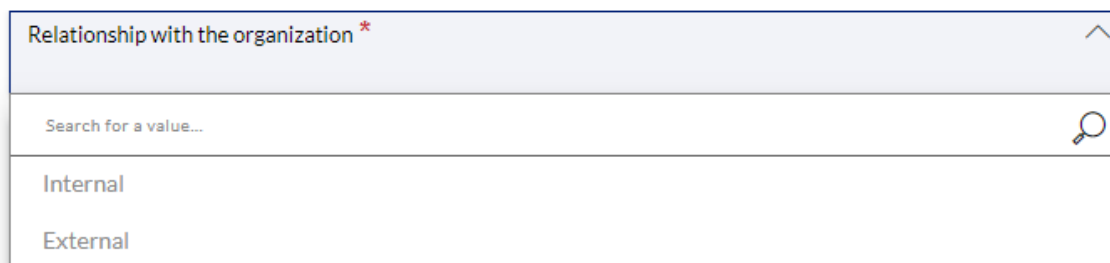
The first step to file a complaint or report an irregularity is to read the privacy policy carefully and accept it, after which you will be redirected to the Whistleblower Channel portal, which will display the screen shown below:

The screenshot displays the 'WHISTLEBLOWING CHANNEL' portal. At the top, there is a blue header bar with the 'plain concepts' logo on the left and 'ENGLISH' with a dropdown arrow on the right. Below the header, the main content area is divided into two columns. The left column contains two sections: 'ATTACHMENTS' with a document icon and the text 'No documents', and 'COMMUNICATION CHANNEL' with a speech bubble icon and the text 'There are no messages sent between requester and manager'. The right column is titled 'NON-COMPLIANCE AND IRREGULARITIES' and contains an 'Introduction' section with a circular icon and text explaining the channel's purpose and the importance of reporting accurately. Below the introduction, there are two dropdown menus: 'Relationship with the organization' and 'Typology of the conduct to be reported'. The 'Typology of the conduct to be reported' dropdown is currently open, showing a search bar and a list of options: 'Non-compliance with legislation and/or internal standards', 'Inadequate, unethical or lack of integrity in professional performance', 'Disrespectful, unequal or unfair treatment', 'Discrimination or violation of human rights', 'Violence, harassment or abuse', 'Corruption and/or fraud', and 'Conduct related to money laundering'.

We are going to analyse each of the fields and steps to be carried out to file a complaint/communication.

1.- RELATIONSHIP WITH THE COMPANY

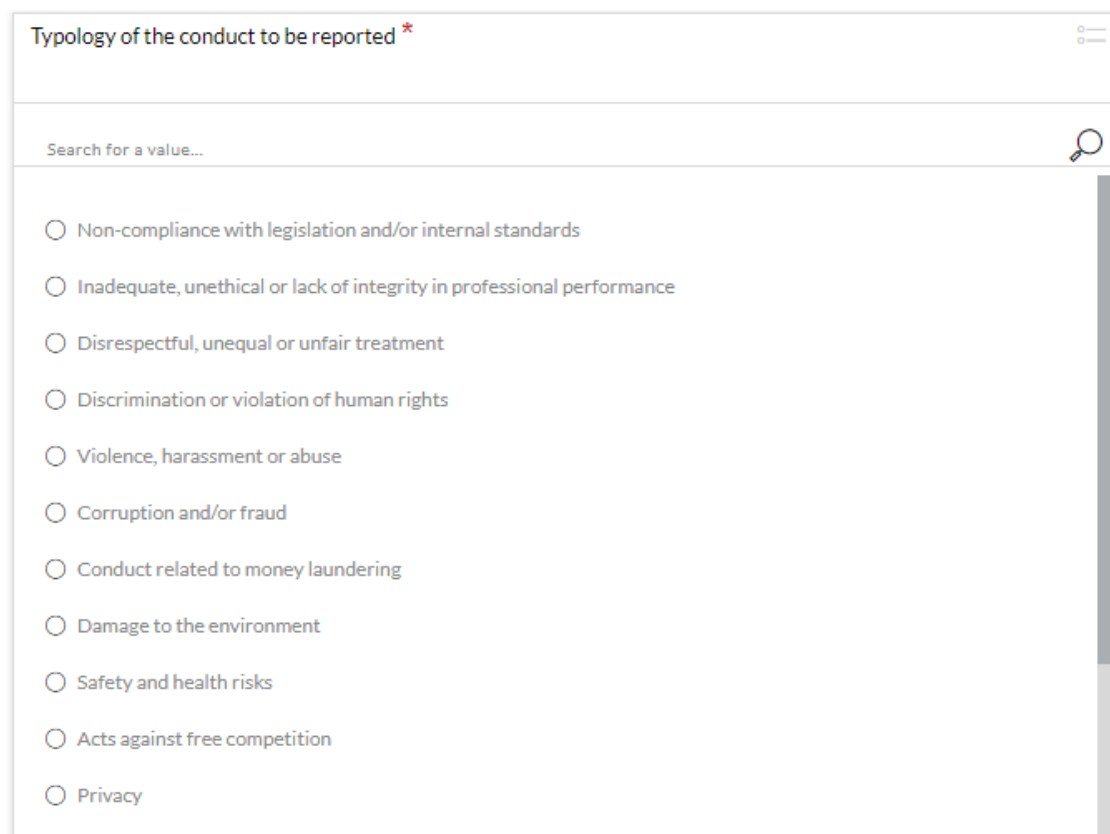
In the first section that appears on the screen you must indicate the type of relationship you have with the company, either external (if you are a client, supplier or other person related to PLAIN CONCEPTS) or internal (in case you are part of PLAIN CONCEPTS).



The screenshot shows a dropdown menu titled "Relationship with the organization *". Below the title is a search bar with the placeholder text "Search for a value...". The dropdown list is open, showing two options: "Internal" and "External".

2.- TYPOLOGY OF CONDUCT TO BE REPORTED

The second section shows the different types of conduct that can be communicated through the Channel, both criminal conduct and conduct that goes against the principles set out in the Code of Ethics and Conduct of PLAIN CONCEPTS, as well as the provisions of its internal policies which, although not a criminal offence, constitute an irregularity.



The screenshot shows a dropdown menu titled "Typology of the conduct to be reported *". Below the title is a search bar with the placeholder text "Search for a value...". The dropdown list is open, showing a list of 12 options, each preceded by a radio button:

- ☐ Non-compliance with legislation and/or internal standards
- ☐ Inadequate, unethical or lack of integrity in professional performance
- ☐ Disrespectful, unequal or unfair treatment
- ☐ Discrimination or violation of human rights
- ☐ Violence, harassment or abuse
- ☐ Corruption and/or fraud
- ☐ Conduct related to money laundering
- ☐ Damage to the environment
- ☐ Safety and health risks
- ☐ Acts against free competition
- ☐ Privacy

If the fact you wish to report doesn't coincide with any of the conduct listed, you have the option of selecting "Other" option and specifying the conduct to be reported in the section "Report's Detail".

3.- TYPE OF REPORT

In the following section you must choose whether your report is anonymous or not.

If it is not, your data will be processed with strict confidentiality and in compliance with the applicable legislation in force, specifically the RGPD and LOPDGDD.

Do you wish to file an anonymous report?	
Search for a value...	
Yes	
No	

If you choose the option to file the report confidentially, the following fields will then be displayed for you to fill in:

Do you wish to file an anonymous report?	▼
No	
Name and last name *	A
EMAIL *	✉
Telephone number	A

The fields with an asterisk must be filled in, and it is optional to provide a telephone number if you wish to do so.

IMPORTANT!!! If you wish to communicate a violence, harassment, or abuse conduct, it cannot be made anonymously.

Typology of the conduct to be reported *

Violence, harassment or abuse

Search for a value...

☐ Non-compliance with legislation and/or internal standards

☐ Inadequate, unethical or lack of integrity in professional performance

☐ Disrespectful, unequal or unfair treatment

☐ Discrimination or violation of human rights

☒ Violence, harassment or abuse

☐ Corruption and/or fraud

☐ Conduct related to money laundering

☐ Damage to the environment

☐ Safety and health risks

☐ Acts against free competition

☐ Privacy

Warning!

Remember that reports of violence, harassment or abuse cannot be made anonymously

4.- REPORT'S DETAIL

In this section you should describe in as much detail as possible the events that took place, indicating the place where they occurred and the date, either specific or approximate.

Report's detail *

When did the breach take place?

dd/mm/yyyy

5.- WITNESSES

Once the facts have been described and explained, in the next section you can indicate, at your choice, the existence of witnesses and then list them.

Were there any witnesses to the breach?

Yes ☒ No ☐

Which persons witnessed the breach?

6.- EVIDENCE

The last section that appears on the screen enables you to attach evidence of the events that took place, and you can upload several files in different formats.

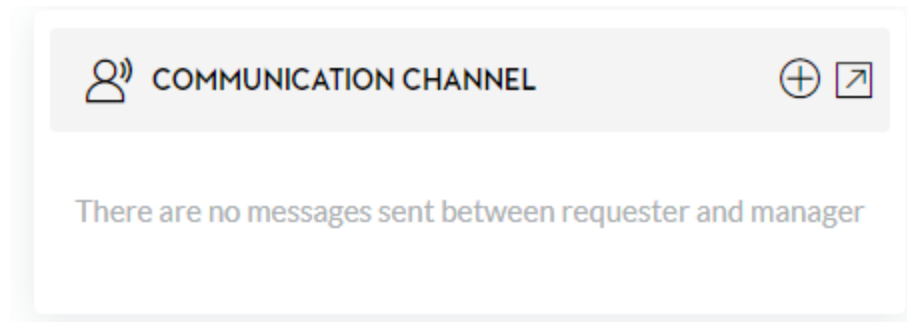
If the complaint is admitted for processing, during the course of the procedure you can provide new evidence if you have any.

Attachments (Evidence)

7.- COMMUNICATION CHANNEL

You (Whistleblower) have at your disposal a private and strictly confidential channel of communication to raise any questions or doubts you may have with the Compliance Body.

This channel is enabled both in the case of anonymous reporting (where no identifying details of the whistleblower will appear) and in the case of confidential reporting.



8.- FINAL STEPS

Once you have introduced all the data indicated above, you should proceed to save the information in the button at the footer, where a tab will pop up where you should indicate the subject of the report with a short tittle such as, for example, "corruption case".

A screenshot of a form titled "WHISTLEBLOWING CHANNEL". The form has a blue header bar with the title and a close button (X) in the top right corner. Below the header, there is a text input field labeled "Case *" with a small upward-pointing triangle icon on the right. At the bottom of the form, there are two buttons: "CANCEL" and "OK".

Once you have entered the subject and clicked the accept button, you should click the exit button on the screen and the following prompt will appear:

This NOTICE is in the case that the report is made ANONYMOUSLY, since in the case that it is made confidentially, the link will be sent to the email, as well as notifications of changes that occur in the processing of the report.

In the case of an ANONYMOUS report, due to the lack of a contact email for the Compliance Body to communicate with you, a unique number and URL is generated for you.

You SHOULD save this number and URL so you can keep track of the whole procedure, make communications to the Compliance Body or provide new evidence.



Your report has been sent.

You can track the handling of your report via the link below. To do so, click on the 'copy tracking link' button. Then place your cursor in the address bar of your browser and paste this link in the bar. You can save this link in your favourites for quick and easy access.

You can also send these tracking data to other email addresses using the 'share' button.

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COPY TRACKING LINK

