

ETHICAL CHANNEL USER MANUAL

plain
concepts 

ÍNDICE

INTRODUCTION..... 3

HOME 4

DATA OF THE INFORMANT/WHISTLEBLOWER 5

DETAILED DESCRIPTION OF THE FACTS 6

PROVISION OF EVIDENCE 7

SENDING OF THE COMMUNICATION 7

INTRODUCTION

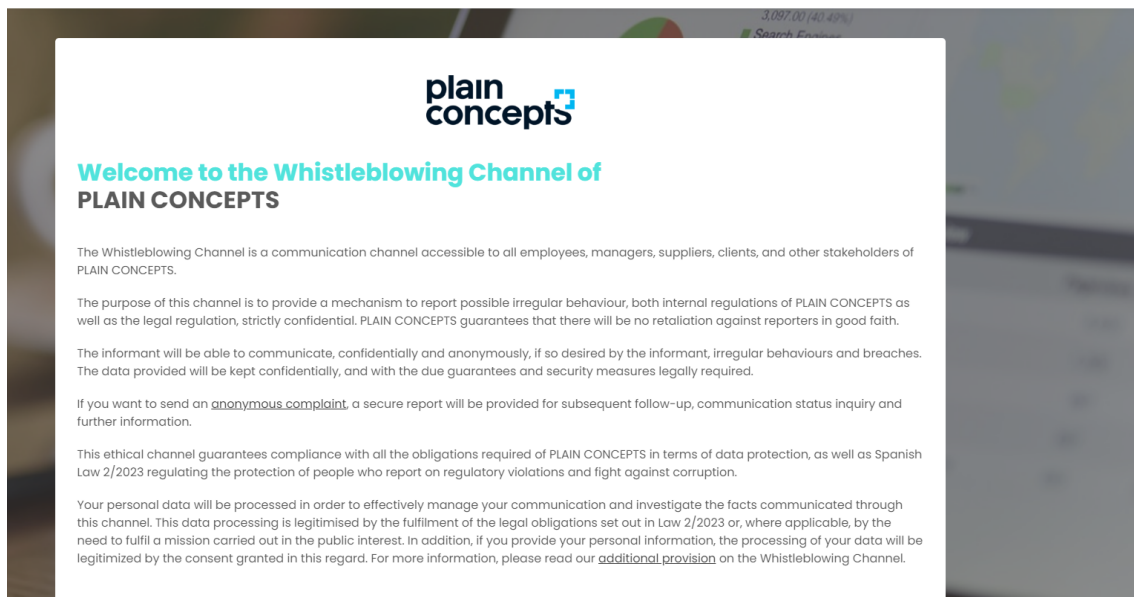
The purpose of this User's Manual is to guide the User when making a communication about an illicit fact that violates legal provisions or irregular conducts that violates the internal regulations o PLAIN CONCEPTS.

"User" means all Plain's employees, management and senior management, suppliers, clients, collaborating staff, interns, and other stakeholders.

The User who wants to make a communication (hereinafter "Informant") may make the communication in complete confidentiality and even anonymously. It is particularly important that the communication is made in good faith so that the Informant cannot be subject to reprisals or suffer other consequences, and its therefore covered by the protection measures provided for in Law 2/2023 on the protection of persons who report breaches of law and fight against corruption.

PLAIN CONCEPTS guarantees that the Ethical Channel complies with all data protection obligations in accordance with current and applicable legislation, specifically Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April, on the protection of natural persons with regard to the processing of personal data and the free movement of such data (RGPD) and the LO 3/2018, of 5 December, on the Protection of Personal Data and guarantee of digital rights (LOPDGDDD).

The personal data will be processed for the purpose of effectively managing the communication made by the informant (you) and investigating facts. The legitimacy of processing is given in compliance with a legal obligation arising from Law 2/2023 and the need to fulfil a mission carried out in the public interest (if applicable). For more information about the processing of your personal data you can consult the Privacy Policy.



On the home screen you can see a short introduction. In the top right corner, there is a drop-down menu where you can **choose the language** of your choice from those available. Now: Spanish, English, Catalan, Portuguese and French.

Next to it there is an icon indicating **“Follow-up of an existing complaint”**, which will be the place where you will have to go if you make a communication and want to follow it up at any time.



DATA OF THE INFORMANT/WHISTLEBLOWER

Informant data:

Name	Surname
<input type="text"/>	<input type="text"/>
Email	Phone
<input type="text"/>	<input type="text"/>
Relationship with the entity*	
<input type="text"/>	

- **Confidential complaint:** in the event that the informant wishes to report the facts confidentially, he/she must fill in the name and surname blanks, as well as the email address, with the phone number being optional.

It is obligatory to indicate the relationship you have with PLAIN CONCEPTS

- **Anonymous complaint:** in the event that the informant wishes to make the report anonymously, it will only be necessary to indicate his or her relationship with PLAIN CONCEPTS.

In this case, a secure report will be provided for subsequent follow-up, consultation of the status of the communication and further information.

The informant may report in good faith any illegal or irregular acts or which he/she has knowledge or evidence that they have been committed.

In the Ethics Channel you can view the different types of conduct that can be reported/communicated arranged in a checklist, and you can choose the appropriate one depending on the events that have occurred or several if there are various irregular or unlawful events.

Reported issues data:

- Actions related to suppliers
Non-compliance with company procedures related to the selection, awarding, or monitoring of suppliers
- Misappropriation, diversion of resources or theft
Fraudulently appropriating for one's own use property entrusted to one's care or improper use of company property or information for one's own benefit. Stealing or misappropriating company property
- Accounting issues
Irregularities related to the entity's accounting obligations
- Irregularities related to confidentiality, personal data and company secrets
Any unauthorized use of non-public information of the company, its clients, personal data or inappropriate use of intellectual property
- Conflict of Interest
Irregular exercise of the duties of a professional due to a personal interest
- Contractual irregularities
Altering, inventing or falsifying, in whole or in part, contracts for the purpose of obtaining an advantage or altering the content of the contract
- Environmental irregularities
Failure to comply with internal or external regulations with respect to environmental or hazardous material issues

In those cases, in which it is not clear to you whether the reported facts fit into any of the cases included in the checklist, you have at your disposal a box called "other", which is the one to choose in that case and then proceed to describe the non-compliance in as much detail as possible and provide the evidence available.

- Other
Check if you do not consider that any of the situations described above accurately describe the event you wish to report

DETAILED DESCRIPTION OF THE FACTS

In order for the management of the communication to be as effective and efficient as possible, you should provide a **detailed description** of the facts, as well as any information that may be of help in your investigation (in case it is admitted for processing).

To do this, you will find a first box where you must provide an **explanation** of the events that occurred and, subsequently, provide details of **when** exactly the event occurred or, if you do not know exactly, approximately and whether it is occurring continuously or whether it was an isolated event.


It should also indicate **the persons involved** in the events being reported, if any, and if known.

Likewise, you must indicate the place where the facts took **place**, being of special relevance if they have been committed in one of the subsidiaries of PLAIN CONCEPTS with headquarters outside Spain.

Finally, you must indicate whether you had direct or indirect knowledge of the facts.

You have the option of communicating the facts orally by means of an audio recording, with a button at the end of the form.

Recording audio

 Recording audio

PROVISION OF EVIDENCE

The last section before sending the communication is intended for you to provide any evidence you may have, enabling you to attach the documents you consider necessary in all formats: Word, pdf, excel, images, videos, recordings...


Attach document

Attach document

SENDING OF THE COMMUNICATION

Once you have filled in all the data indicated above, you can proceed to send your report.

A code will then be generated from which you can access the monitoring and status of the report by clicking on the top right-hand corner of the page where it says "Follow-up of an existing report" or directly from the main page of the Ethical Channel.

 Follow up of an existing complaint

Communications from PLAIN CONCEPTS

Enter the reference code (example: MP.12.4567-1234-1234-ABCD):

MP.12.4567-1234-1234-ABCD

Remember to keep the code in a safe place, as, if you have made your communication **anonymously**, this will be the only way to contact the Ethics Channel Manager.