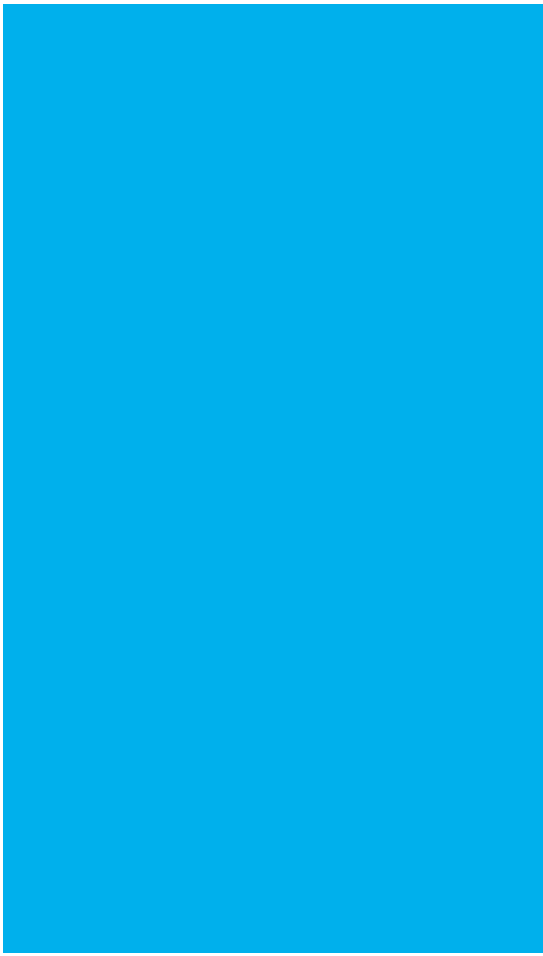


plain  
concepts

# Code of Ethics



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**Pablo Peláez**  
CEO, Plain Concepts



# Welcome letter

**Plain Concepts** has been able to adapt to the great changes changes that we have been faced with over the last few years, always with the aim of improving the quality of life of all those who interact with us. The fact that we have grown so much in such a short time implies a lot of responsibility and commitment from each of us.

In this intense phase, our customers, employees, shareholders, suppliers, subsidiaries, partners and other social representatives expect our business to be conducted with integrity and in compliance with the law. This Code of Ethics is intended to make Plain Concepts more transparent and bring it closer to all its stakeholders.

Plain Concepts has always had a strong commitment to customer service, quality development and employee growth, and we deliver thanks to the effort and dedication you show every single day. Key to our performance in these areas is an equally strong focus on ethics and integrity in our business conduct.

Doing things the right way, ethically, with integrity, respecting the privacy and confidentiality of our stakeholders, and complying with laws and established guidelines is an integral part of our corporate culture. By working together as a team and supporting each other, we will achieve our goals: the continuous improvement and the constant

“collaborative growth”. Our group was founded in 2006 by 4 MVP’s. Today, thanks to the team effort of all people who were and will continue to be involved, we have more than 14 offices spread across Europe, America and Oceania. Ethical compliance allow us to continue working on improving the daily management of our offices and become more efficient. These ethical principles are part of our social responsibility and must be observed in all our activities, spaces and day-to-day business. All these principles are gathered in our Code of Ethics.

This updated Code of Ethics allows us reinforce the trust of our directors, employees, investors, customers, suppliers, authorities and communities.

This Code is a useful working tool that guides us to make the right decisions in accordance with our values. I invite all members of our family at PLAIN CONCEPTS to read, reflect on and consult our Code on permanent basis. It is very important that you report to us any irregularities that you may observe.

You are at the heart of Plain Concept’s success. Therefore, we expect you to comply with the obligations and standards set forth herein. But also to keep always in mind that, in our we stand out for the passion and commitment we bring to work day and day out, and for people at the center of organization.

The image is a vertical collage of three scenes, all in a dark blue monochrome palette. The top scene shows a person's hands typing on a laptop keyboard. The middle scene shows a wooden tray filled with olives and olive branches. The bottom scene shows hands writing on a document with a pen, with a coffee cup visible in the background.

# 01 Purpose

**Plain Concepts** is a technology company founded in 2006 by 4 Microsoft MVPs (Most Valuable Professional) with the goal of helping other companies to adopt new technologies, aiming to improve their productivity and processes.

Plain Concepts is specialized in disruptive technological developments. Our mission is to offer customized, innovative and attractive solutions for all kinds of digital needs, while incorporating the latest technology available and respecting at all times the applicable legislation in each place where the company provides its services.

This Code of Ethics is set out as a starting point and affects all our activities. Our actions are based on respect for the following values: honesty, loyalty, transparency, trust, professionalism and innovative spirit, among others.

All those who are part of this company, whether they are managers, employees or other stakeholders, such as our customers and suppliers, should be guided by these values.

This Code of Ethics also reflects the company's commitment to respect the human rights recognized within the framework of the company's guiding principles.

This Code, together with all the other corporate documentation, represents a commitment to legality, good governance, transparency, accountability, independence and reputation with respect to socially accepted ethical standards.



# 02

Scope of application



This **Code of Ethics** is applicable to the governing bodies and to all professionals linked to any company of the Plain Concepts Group as well as to those customers, suppliers, partners and other third parties that provide services, supply goods or interact with the Plain Concepts Group.

Plain Concepts constitutes a corporate group within the meaning of former Article 42 of the Spanish Code of Commerce. The parent company is Plain Concepts S.L.U. and it is mainly engaged in consultancy, training, technology development, infrastructure and other services related to technology.

It should be noted that, in those companies and entities where Plain Concepts does not have a majority holding and/or control, but is responsible for management, individuals representing Plain Concepts will promote the application of the vision, values and standards of conduct set out in this Code.

For these purposes, the following are considered professionals: (i) employees; and (ii) trainees and interns, regardless of the legal form of their employment or service relationship, their hierarchical level, their geographical or work location, and the Group company for which they provide their services (hereinafter "Professionals"). Those Professionals of the Plain Concepts Group who manage or lead teams of people must also ensure that their direct reports know, understand and comply with this Code and lead by example.



# 03

Principles of  
ethical conducts

This Code of Ethics is based on the following ethical principles and shall govern relations with the stakeholders listed below.

The principles are:

### **Act**

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in accordance with applicable national and international laws.

### **Foster**

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a safe, stable, non-discriminatory and equal-opportunity work environment.

### **Promote**

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transparency, confidentiality and fairness in all areas of the company's operations.

### **Innovate**

---

to develop new technologies in order to improve social development.

### **Respect**

---

the environment and achieve full sustainable development.



# 04

## Commitment

PLAIN CONCEPTS undertakes to base its relationship with stakeholders on ethical criteria and transparency in all the places where it carries out its business and/or professional activity, as well as to act in accordance with the applicable national and international laws.

## **4.1\_ Commitment to Professionals**

### **4.1.1\_ Occupational Health and Safety**

Plain Concepts offers its employees a safe and stable working environment and is committed to adopt a range of measures to raise awareness of occupational hazards. Plain Concepts continuously improves the health conditions of its employees, including the promotion of physical activity and healthy habits.

### **4.1.2\_ Non-discriminatory environment**

Plain Concepts does not tolerate direct or indirect discrimination at work, on grounds of sex, race, religion, opinion or any other personal or social condition or circumstance. We promote a respectful working environment and fair treatment of all people.

Plain Concepts rejects all forms of moral or sexual harassment and all conduct that violates dignity or creates an environment that is offensive to personal rights. Plain Concepts is committed to put in place all necessary policies to ensure equal treatment of all employees, based solely on objective criteria, such as professional value, merit or labor market situation.

### **4.1.3\_ Equal opportunities**

Plain Concepts is committed to ensuring effective gender equality, implementing active policies aimed at eliminating all forms of discrimination against women and recognizing the right to a work-life balance. Plain Concepts is implementing an equality plan with a set of measures to evaluate selection and recruitment processes, salaries and compensations, as well as job classification. Plain Concepts seeks to reward talent and believes that everyone has the right to access fair opportunities.

### **4.1.4\_ Respect for Privacy and Personal Data Protection.**

Plain Concepts respects the right to privacy of all its professionals and ensures confidential treatment of their personal data in accordance with current legislation on personal data protection. Furthermore, Plain Concepts considers privacy an essential asset and as such the company will expressly and unequivocally inform about the existence of video surveillance systems, geolocation, control or other practices that may involve the collection and processing of personal data.

Pursuant to the principle of data minimization, Plain Concepts will only use those data that are strictly necessary in relation to the purposes for which they were collected and/or processed.

### **4.1.5\_ Security and Confidentiality of Information**

Plain Concepts has an Information Security policy in place in order to guarantee the authenticity, integrity and availability of the information. All Plain Concepts professionals assume the obligation to maintain the secrecy and confidentiality of all information to which they have access by signing a confidentiality agreement at the beginning of the employment relationship.

In order to prevent risks that may affect the confidentiality of information, our staff participates in continuous training activities on data protection, privacy and information security in order to secure full confidentiality, both internally and externally, when dealing with customers, suppliers and potential investors.

#### **4.1.6\_ Conflicts of interests**

Plain Concepts will avoid situations that cause a conflict between the personal interests of professionals and the interests of the Company.

Plain Concepts will encourage a good practice policy to avoid using one's position in the company for personal advantage.

#### **4.1.7\_ Gifts, hospitality and entertainment**

All professionals of Plain Concepts are required to report to the company's management any gifts, hospitality or entertainment events offered that may influence the objectivity of their professional activity.

#### **4.1.8\_ Measures against corruption**

Plain Concepts wants to set an example in the prevention and fight against corruption. Plain Concepts strongly rejects any corrupt acts carried out by professionals in all areas of the company's activities.

## **4.2\_ Commitment to Customers and Suppliers**

This group includes all natural and legal persons who have a contractual relationship with Plain Concepts for the supply of goods or services.

### **4.2.1\_ Sensitive information**

Plain Concepts guarantees that all information the company holds about its clients will be treated in a diligent and rigorous manner, respecting the confidentiality and appropriate use of such information.

### **4.2.2\_ Quality and safety**

Plain Concepts maintains an active quality policy in order to get to know and meet all the needs of the Company's customers. Plain Concepts is committed to continuously improve the efficiency of all its products and/or services in order to achieve maximum excellence. Plain Concepts strives to become a leader in innovation and development, acting under the best national and international practices to achieve the highest standards of safety and quality, and bases its relationships with customers on mutual respect and trust.

### **4.2.3\_ Intellectual and industrial property**

Plain Concepts will process all confidential information with due diligence to adequately protect the intellectual and industrial property of all its clients, sharing it only with those parties authorized under the Spanish Intellectual Property Law and its complementary legislation, or due to the existence of a contractual relationship.



#### **4.2.4\_Selection policy**

Plain Concepts guarantees that the selection of suppliers is carried out in a fair manner, according to objective, transparent and unbiased criteria. Plain Concepts will ensure that the companies supplying goods or services carry out their activity within the framework of business ethics, with full respect for human rights, the non-use of forced labor and respect for the environment.

### **4.3\_ Commitment to Investors**

#### **4.3.1\_Good governance**

Plain Concepts undertakes to base its relations with shareholders on transparent criteria and provide truthful and accurate information about its market activity and its financial situation.

#### **4.3.2\_Measures against bribery and money laundering**

Plain Concepts has measures and procedures in place to prevent irregular payments or money laundering from illicit or criminal activities in the course of its operations. Plain Concepts is committed to carry out specific controls on all unusual financial transfers. Plain Concepts has zero tolerance for corruption and prevents any form of bribery, extortion and influence peddling.

#### **4.3.3\_Fair competition**

Plain Concepts is committed to act in accordance with fair competition standards in the markets where it operates and condemns all aggressive practices that go against the free market and the requirements of good faith.

## 4.4\_ Commitment to public administration

This group includes all public administrations, from local to international level, including those authorities and bodies in the geographical areas where the Company operates.

Plain Concepts will promote a relationship of respect and collaboration with all public authorities and will not accept favorable treatment from any public representative or official.


In its daily business with public administrations, Plain Concepts will promote a policy based on trust and good faith within the legal framework, in order to prevent any form of corruption, bribery and similar practices.

## 4.5\_ Commitment to society

Plain Concepts acts in a socially responsible way in all those territories where it operates. The company is committed to improving the quality of life and the economic development of society, promoting solidarity and entrepreneurship in order to achieve greater social prosperity. Plain Concepts is aware of its impact on society and all members of the organization assume this social commitment.

### **Sustainability and environment:**

Plain Concepts is committed to protecting the environment while respecting all legal requirements in order to achieve sustainable development and minimize the environmental impact of its activities. Plain Concepts aims to fight climate change and therefore opts for a production activity that is compatible with climate security and the limited resources of the planet.



# 05

## Understanding the Code of Ethics

Plain Concepts management will supervise and monitor compliance with this Code of Ethics.

The content of this Code of Ethics is not intended to cover all possible situations that may occur, but to establish a basic framework that should guide the actions of Plain Concepts' professionals, customers and suppliers. Should professionals have any doubts regarding the actions, principles or values set out herein, they should reach out to the company management.



# 06 Publication and Monitoring

This Code of Ethics will be published and available to all obligated parties either through the corporate intranet, the company's website, or in any other format the company management deems fit.



# 07 Validity and acceptance

This Code of Ethics and Conduct becomes effective on the date of its publication by Plain Concepts and shall remain in effect until superseded.

The Code will be reviewed regularly and, where appropriate, policies, processes and controls will be modified, updated or implemented as necessary to comply with the values upheld herein.

The Board of Directors of Plain Concepts will update the contents of the Code as often as necessary to ensure that it is consistent with the ethical and compliance issues most important to the company.





Spain

USA

United Kingdom

UAE

Germany

Netherlands

Australia

[www.plainconcepts.com](http://www.plainconcepts.com)