

# **POLICY AGAINST SLAVERY AND HUMAN TRAFFICKING**

**plain**  
**concepts** 

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## 1. SCOPE OF APPLICATION.

This Policy applies to all companies that make up the PLAIN CONCEPTS Group (hereinafter "Plain Concepts" or "the Group"). In addition, this Policy also applies, where appropriate, to *joint ventures*, temporary business associations and other equivalent associations, when a Group company assumes their management.

It applies to all persons who are part of the Group, regardless of their position and the role they perform.

Its application may be extended, in whole or in part, to those natural or legal persons linked to the Group by a relationship other than an employment relationship when such a relationship may give rise to a conflict of interest.

This Policy also constitutes the Annual Statement against Modern Slavery and Human Trafficking, issued in accordance with Section 54 of the UK Modern Slavery Act 2015, for the year 2026.

### 1.1 STRUCTURE AND ACTIVITIES OF THE PLAIN CONCEPTS GROUP

PLAIN CONCEPTS carries out activities in the areas of technology consulting, software development, artificial intelligence solutions, cloud services, data analysis and digital transformation.

The organisational structure includes:

- Plain Global Solutions, S.L.
- Plain Concepts, S.L.U.
- Plain Concepts UK, LTD.
- Plain Concepts Corporation, INC.
- Plain Concepts, GmbH.
- Plain Concepts RO, S.R.L.
- Ardanis Technologies, Ltd.
- Ardanis Portugal, Lda.
- Apiumhub, Ltd.

- Apium Education, Ltd.

The Group operates in various jurisdictions, including:

- Spain.
- The United Kingdom.
- The United States.
- Germany.
- Romania.
- Ireland.
- Portugal.

## 1.2 SUPPLY CHAIN

The Group's supply chain consists of suppliers, contractors and third parties who contribute to the development of its operations and services. The main types of suppliers are:

- Technology and software providers: companies that supply tools, licences and digital platforms used by the Group.
- Cloud and infrastructure service providers: companies that provide storage, server, hosting and system maintenance services.
- Staff selection and recruitment providers: recruitment agencies and staff outsourcing.
- External professional service providers: consultancies, audits and specialised outsourced services.
- Auxiliary service providers: logistics, travel, cleaning, catering and other support services necessary for operations.

To ensure that modern slavery or human trafficking does not occur in our supply chain, the Group applies due diligence and continuous monitoring processes, including contract review, audits and risk assessment based on the criticality of the supplier.

## 2. POLICY OBJECTIVES

Modern slavery is a crime and a violation of fundamental human rights. It is a complex crime that takes many forms, such as slavery, servitude, forced and compulsory labour, and human trafficking. They all have in common the deprivation of a person's liberty for commercial or personal gain.

Since our inception, the PLAIN CONCEPTS Group has maintained a **zero-tolerance** stance towards all forms of modern slavery and is committed to conducting all our business and commercial relationships in an ethical and honest manner, respecting human rights and freedoms, as well as implementing and enforcing effective systems and controls to ensure that modern slavery does not take place in any of the entities that make up the Group.

We are also committed to ensuring **transparency** in our company and in our approach to tackling modern slavery throughout our supply chain, complying at all times with our obligations under the current legislation of the countries in which we operate and have subsidiaries, specifically complying with the provisions of the *Modern Slavery Act 2015* (UK), as well as the international regulations ratified by Spain (*ILO Convention 29 on forced labour* (1930); *Convention 105 on the abolition of forced labour* (1957)).

The people who form part of the Group (employees, interns, trainees, managers, etc.) as well as stakeholders (suppliers, customers, business partners, collaborators, etc.) must comply with the same high standards in this regard.

## 3. DEFINITIONS

This policy covers the four types of conduct covered by legislation on modern slavery and human trafficking, specifically the *Modern Slavery Act 2015* and applicable international regulations:

- **Slavery:** forced labour performed without adequate financial compensation, through appropriation or control by another person and with a restriction on the free movement of the person concerned.
- **Forced labour:** work performed involuntarily and under coercion, threats, violence or intimidation, including threats to report to the authorities, confiscation of identity documents, withholding of wages and fraudulent debts.
- **Servitude:** obligation to provide services imposed through the use of coercion or force.

- **Human trafficking:** recruitment, transportation, harbouring, transfer or receipt of a person through threats, coercion, abduction, fraud, etc., for the purpose of exploitation.
- **Supply chain:** all suppliers, subcontractors and third parties that contribute directly or indirectly to the provision of goods or services by the company. This includes critical, ancillary and strategic services that could pose a risk of modern slavery if not managed properly.

#### 4. SUBJECTIVE SCOPE

This policy applies to all individuals who are part of Plain Concepts or act on our behalf in any capacity. Regardless of position or level, the provisions set forth in this document shall apply equally to each and every individual, from employees, interns, collaborators, volunteers, and senior management to team leaders, external consultants, third-party representatives, and business partners. It is vitally important to read, understand, and comply with the provisions set forth in this document in order to fulfil the objective of this policy.

#### 5. OBLIGATION TO COMPLY

As mentioned above, this Policy is binding on all persons who are part of Plain Concepts or act on our behalf, all of whom are obliged to comply fully with its provisions and are aware of the importance of maintaining a strict stance against modern slavery and human trafficking.

The prevention, detection and response to modern slavery in any part of our business or supply chain is the responsibility of both management and all persons working with us or under our control. It is therefore vitally important that, in order to comply with the purpose of this Policy, in cases where you are aware or suspect that any of the persons mentioned above is being coerced, forced or controlled by another person to work, are a victim of one of these situations or are aware of a violation of any of the provisions contained in this document, you have a duty to report it as soon as possible through the internal information system set up for this purpose on our website.

This communication will be treated as strictly confidential, with no one other than the personnel authorised to manage it having access to the information, and protecting the person making the report in good faith from reprisals of any kind. The option of making the communication anonymously is also available if desired.

The Compliance Body is responsible for implementing and managing this policy, continuously monitoring its application and effectiveness, and making any changes and strengthening controls as necessary to ensure that the objective of combating modern slavery is achieved.

For its part, the Management and Human Resources Department is responsible for ensuring that the people who receive information about this document understand it, comply with its provisions and receive adequate training.

## 5.1 POLICIES RELATED TO SLAVERY AND HUMAN TRAFFICKING

In addition to this policy, the Group has internal policies that support the prevention of modern slavery and human trafficking, including:

- Group Code of Ethics.
- Protocol against workplace harassment.
- Human Rights Policy.
- Internal Reporting System Policy (Whistleblowing Channel)
- Money Laundering and Terrorist Financing Prevention Policy
- Policy on personal relationships between employees
- Anti-Corruption and Anti-Fraud Policy
- Gifts and Hospitality Policy.

## 5.2 DUE DILIGENCE PROCESSES

To ensure that modern slavery and human trafficking do not occur in our operations or supply chain, the PLAIN CONCEPTS Group applies a structured due diligence process, which includes:

1. **Prior assessment of suppliers:**
  - A risk analysis is carried out before new suppliers are brought on board, taking into account the jurisdiction, sector and criticality of the services or products supplied.
2. **Contractual clauses:**
  - Compliance clauses against modern slavery are included in contracts, where feasible.
  - Suppliers undertake to report any risk or non-compliance detected in their operations.
3. **Continuous monitoring and follow-up:**
  - Findings are evaluated by the Compliance Body and, if any non-compliance is detected, a corrective action plan is defined and taken to the Regulatory Compliance Committee.
4. **Internal information system (reporting and communication channel):**

- Communication mechanisms are put in place so that employees, suppliers and third parties can report any indications of human rights violations confidentially or anonymously.
- Complaints are investigated immediately and corrective measures are taken where appropriate.

**5. Documentation and record keeping:**

- All due diligence processes, risk assessments and audits are documented and kept up to date to enable monitoring and traceability.

### **5.3 RISK ASSESSMENT AND MANAGEMENT**

The PLAIN CONCEPTS Group recognises that certain risks of modern slavery and human trafficking may arise in its operations or supply chain. To manage these risks, the following principles are applied:

**1. Risk identification:**

- Efforts are made to identify potential risks of modern slavery in all areas of the business and in the supply chain.
- Factors considered include the geographical location of suppliers, the nature of the service or product supplied, and the criticality of the supplier to the Group's operations.

**2. Risk assessment:**

- Questionnaires, audits, and compliance reviews are used to assess risk exposure.

**3. Risk management and mitigation:**

- When risks are identified, measures are put in place to mitigate them, which may include, for example:
  - Requesting additional commitments from suppliers.
  - Corrective action plans.
  - Continuous monitoring of critical suppliers.

**4. Review and monitoring:**

- Where possible, procedures and controls are adjusted based on experience gained and emerging risks.



## 5.4 KEY PERFORMANCE INDICATORS (KPIs)

To measure the effectiveness of the actions implemented to prevent modern slavery and human trafficking, the PLAIN CONCEPTS Group monitors the following indicators as far as possible:

**1. Supplier assessment:**

- The number of suppliers reviewed and those identified as being at higher risk is monitored.

**2. Reported incidents:**

- The number of incidents or alerts related to possible cases of modern slavery or human trafficking originating from the Internal Information System is recorded.

**3. Training and awareness:**

- Percentage of employee participation in training and awareness activities on regulatory compliance.

**4. Continuous improvement:**

- The implementation of corrective actions or adjustments to internal processes resulting from findings, reviews or incidents and ISO certifications (9001, 14001, 27001 and 27701) is recorded.

## 5.5 TRAINING ON COMPLIANCE AND PREVENTION OF MODERN SLAVERY RISKS

The PLAIN CONCEPTS Group ensures that, as far as possible, all employees and senior management have received training in compliance, covering both legal obligations and the organisation's ethical standards and best practices. The aim of this training is to ensure that everyone in the Group understands their responsibilities in relation to regulatory compliance, business integrity and the prevention of legal, ethical and reputational risks, including the prevention of modern slavery and human trafficking. The training provides guidance on how to identify, report and act on potential breaches, fostering a culture of accountability and transparency throughout the organisation.

## 6. REVIEW, CONTROL AND UPDATING OF THE POLICY

This policy will be reviewed annually by the Compliance Body and the Human Resources Department in order to make any modifications and/or updates necessary for its proper functioning and effectiveness, as well as to comply with legal provisions and our Code of Ethics.

The Compliance Body continuously monitors the entire Criminal Compliance Management System, which includes verifying the effectiveness of this Policy.

## **7. COMPLIANCE BODY**

You may contact the Compliance Body to inform the company of any act that contravenes the provisions of this Policy or any questions you may have about its content by sending an email [tolegal@plainconcepts.com](mailto:tolegal@plainconcepts.com).

We also invite you to comment on this policy and suggest ways to improve it.

## **8. POLICY BREACH**

Non-compliance with the provisions set out in this document will result in disciplinary action, graded according to the seriousness of the facts and in accordance with our Disciplinary Regulations.

We also reserve the right to terminate our relationship with individuals and organisations acting on our behalf in cases where there is a violation of the provisions set out in this policy.

## **9. POLICY VALIDATION**

In accordance with the established procedure, this policy has been validated by the Regulatory Compliance Committee.

## **10. APPROVAL OF THE POLICY**

This Policy shall not have retroactive effect prior to its entry into force, having been approved by the Board of Directors, and shall apply from the moment it is disseminated through the channels established for this purpose.

## **11. DISSEMINATION AND ENTRY INTO FORCE OF THE POLICY**

This policy will be communicated and disseminated to all Company personnel and related parties, and will be available and permanently updated on the corporate intranet or equivalent information hosting space of PLAIN CONCEPTS, at which point it will become mandatory for all Company personnel to be familiar with and comply with it.

Similarly, training and awareness-raising will be carried out on the subject to ensure its understanding, knowledge of its content and implementation of the guidelines established by its recipients.

**\*This is a translated version of the original signed Policy.**

## ANNEX I

### Change control

Version	Date	Responsible	Comments
01	01/08/2023	Legal Department	Initial version
02	13/02/2026	Legal Department	Updated in accordance with the criteria required in the Modern Slavery Act guidance: <a href="https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement#what-to-include-in-a-modern-slavery-statement">https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement#what-to-include-in-a-modern-slavery-statement</a>