



PROSEGUR

Human Rights Policy

Prosegur Compañía de Seguridad

Human Resources
28/10/2020

1. Human Rights in Prosegur

Prosegur's goal is to make the world safer and, and to do so it plays an active role in respecting and safeguarding Human Rights, and ensuring they are upheld.

Prosegur considers Human Rights to be at the heart of our business project. The Board of Directors thus approves this Policy, formally spelling out Prosegur's commitment towards careful and continued respect for Human Rights.

The Human Rights Policy will be applied to all subsidiaries, activities and business lines of Prosegur Compañía de Seguridad, S.A., in all countries where it operates. Similarly, the Governing and Governing Bodies are responsible for leading, disseminating and promoting compliance with this Policy among all employees and stakeholders.

This policy is developed to continue the constant process of integration of Human Rights in Prosegur. The Human Rights Policy becomes part of the interlocking system of internal instruments Prosegur deploys to fulfil its responsibility in this area in recent years.

- ▲ Code of Ethics and Conduct.
- ▲ Corporate Responsibility or Sustainability Policy.
- ▲ Occupational Health and Safety Policy.
- ▲ 3P General Policy on Discrimination and Harassment Complaints.
- ▲ 3P General Procedure for the Complaints Channel.
- ▲ 3P Human Resources Decalogue.
- ▲ 3P Security and Associated Policies Decalogue.
- ▲ Data Protection and Information Security Policy.

The Human Rights Policy and related documents have been drawn up and implemented based on the United Nations Guiding Principles on Business and Human Rights, and the following norms and standards that Prosegur expressly undertakes to follow:

- ▲ International Bill of Human Rights;
- ▲ Ten Principles of the United Nations Global Compact;
- ▲ Charter of Fundamental Rights of the European Union;
- ▲ The core conventions of the International Labour Organization (ILO);
- ▲ OECD Guidelines for Multinational Enterprises;
- ▲ International Convention on the Rights of the Child;
- ▲ Convention on the Rights of Persons with Disabilities;
- ▲ International Convention on the Elimination of All Forms of Racial Discrimination;
- ▲ Convention on the Elimination of All Forms of Discrimination against Women;
- ▲ Principles for the Empowerment of Women;
- ▲ Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment;
- ▲ International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families;
- ▲ International Finance Corporation's Equator Principles;
- ▲ United Nations Principles for Responsible Investment;
- ▲ United Nations Environment Programme Finance Initiative.

2. Principles

Prosegur is committed to exercising clear and unflagging leadership in the area of Human Rights, complying with prevailing laws in each of the jurisdictions in which it operates and with the rights enshrined in the international instruments ratified in this Policy.

As part of its commitment, Prosegur has established the principles that, as a minimum, will be applied to all company processes and relations with its employees, suppliers, customers and social environments in which it participates.

These principles are focused in particular on relevant issues with an impact on human rights arising from its activity.

2.1. Life and physical integrity

In line with Article 4 of the Universal Declaration of Human Rights, Prosegur safeguards the life, liberty and personal safety of all members of its business environment as well as those who may be affected by its activities.

Prosegur deplors torture and inhumane treatment. Under the protection of the company, no one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

2.2. Forced labour and slavery

Prosegur refuses to knowingly resort to any form of forced labour or practice tending towards modern slavery.

As provided for under article 5 of the Charter of Fundamental Rights of the European Union and Convention 105 of the International Labour Organization on the abolition of forced labour, the commitment to respect and not to be a victim of these practices will be monitored and, where appropriate, extinguished.

2.3. Child labour

Prosegur does not allow any type of child labour.

The group's procurement policies and supplier management processes stipulate unconditional respect for the minimum working age set out in Convention 138 of the International Labour Organization, and in the regulations of the respective countries, if they are more stringent.

2.4. Right to safety and health

One of Prosegur's priorities is to ensure a safe and healthy working environment.

Prosegur has a global commitment, through its Occupational Health and Safety Policy - which applies to the entire organisation - to guarantee that the necessary resources are properly in place at the local level to ensure that the occupational health and risk prevention standards established in the national legislation of each country are met.

2.5. Non-discrimination

Prosegur, following the human rights policies and standards it is committed to following, pledges that there will be no discrimination on the basis of sex, race, religion, origin, marital status, social condition or any other personal distinction within the organisation, and that it will provide special protection to any group particularly vulnerable to this type of behaviour.

The company promotes diversity among employees and ensures equal opportunities for job and career advancement.

Prosegur is also committed to maintaining a work environment free from harassment, abuse, intimidation or violence.

2.6. Conditions in the workplace

Human capital is Prosegur's most prized asset. Therefore, the relationship with employees must be based on the principles of justice, fairness, dignity and respect.

The company plays a leading role in its sector, striving to ensure strict compliance with labour and social security regulations in all jurisdictions, guaranteeing decent working conditions, including working hours and rest periods, contribution to social security systems, work-life balance and commitment to a safe working environment free of discrimination.

2.7. Fair and satisfactory remuneration

Prosegur's work across the world is the result of the work of its employees and partners, who deserve a fair compensation based on principles of equity and meritocracy.

In Prosegur, all remuneration systems abide by prevailing laws and are aligned with each country's market standards and living standards, to ensure that the employees' income meets their needs and those of their families.

Similarly, all Prosegur stakeholders will receive equal pay for equal work and any type of discrimination will be rejected.

This commitment also applies to suppliers and customers, who must share this philosophy and pay criteria with their employees.

2.8. Work/life balance, rest and digital disconnection

Prosegur undertakes that working and rest hours, the right to digital disconnection and employees' working hours must comply with the labour laws in force.

The company thus recognises the right to rest, leisure, reasonable limitation of working hours and regular paid holidays, as provided for in article 24 of the Universal Declaration of Human Rights.

Prosegur sees families as a cornerstone of our communities, so it always aims to ensure its employees have a good work/life balance, as well as the protection of motherhood, fatherhood and childhood in line with article 25.2 of the Universal Declaration of Human Rights.

2.9. Training

Prosegur is firmly committed to the talent and professional development of its employees. It does so through a commitment to offer varied, multi-platform, quality training that provides employees with adequate preparation to perform their duties, promote and achieve their professional development. And training is the main channel for the transmission of the values and principles of Prosegur in its environment.

2.10. Freedom of association and collective bargaining

Prosegur recognises the fundamental right of workers to form, participate or join trade unions or other representative bodies in accordance with Convention 87 of the International Labour Organization on freedom of association and protection of the right to organise themselves.

And under each country's labour laws, the right to engage in trade union activity, collective bargaining and non-discrimination and protection of workers' representatives is guaranteed.

2.11. Freedom of expression

Prosegur pledges to respect Article 11 of the European Charter of Fundamental Rights regarding the freedom of expression of its employees, respecting the freedom of opinion and ensuring the confidentiality and privacy of communications, either outside the company or using internal mechanisms such as the Ethical Channel, specifically designed to ensure that this principle is observed.

Prosegur establishes special protection for human rights defenders, in line with the provisions of the 2000 mandate of the Commission on Human Rights regarding the right and duty of individuals, groups and institutions to promote and protect human rights and basic freedoms.

2.12. Right to privacy

Prosegur guarantees the right to confidentiality and privacy of both its employees and third parties. This means paying special attention to the correct use of personal data and information collected within the organisation.

Prosegur's Data Protection Policy and Information Security reflects its global commitment to maintaining workers' privacy before the actions and knowledge of others.

2.13. Commitments to society

Prosegur remains strongly committed to helping to improve, as far as possible, social rights in all areas in which it operates and to create a more equal society. It recognises the right of local communities to well-being and the environment as a distinct human right, which must be respected within the framework of Prosegur's activities.

To do this, it channels its social action projects into education, support for culture, the occupational and social integration of people with special needs and the promotion of corporate volunteering, through the Prosegur Foundation. The company is also committed to the environment and to combating corruption, extortion and bribery in all their forms.

3. Management Model: Continuous improvement cycle

With the firm intention of ensuring strict compliance with this policy, Prosegur has systematically applied due diligence management in the field of Human Rights based on the cycle of continuous improvement.

This four-step operational approach is an example of how Prosegur constantly reviews and improves its actions, objectives and processes in this area, to make sure that its internal processes allow it to effectively identify, prevent, mitigate and repair possible negative impacts on human rights.

3.1. Schedule

The basic pillar of this approach is to assess and determine our impact on human rights. This exercise took place in 2018 with the Due Diligence process, a cross-sectional analysis of the company's different business lines and countries, to identify possible sources of risk for the respect of Human Rights.

This gave us a Risk Map, which we use as the basis for planning measures to correct any aspect of our internal or operational processes that may pose a risk to human rights.

Assessment and planning must be ongoing, and regularly repeated, as risks to Human Rights can change over time, depending on how the company's operations and operational context evolve.

Dialogues will also be established with stakeholders, with the aim of involving them in the process of designing and implementing the planned measures.

3.2. Deployment

All levels of the organisation are involved in the implementation of the measures set out in the human rights planning: From corporate divisions, to local teams in each country and to each of the Prosegur employees, whatever their role.

Therefore, in addition to supervision and strict monitoring of the implementation of preventive and corrective measures provided at each level, Prosegur uses two key tools for the proper integration of the due diligence in the field of Human Rights: communication and training.

Respect for human rights will be instilled in corporate values, applying training initiatives to ensure that the Policy is understood and that it is present in every individual and collective action of the organisation.

Prosegur undertakes to disseminate this Policy in particular and respect for human rights in general both internally and publicly.

3.3. Verification

It is crucial to verify the effectiveness of the measures and policies implemented in order to confirm that Human Rights are indeed being upheld.

Prosegur is committed to having the necessary tools for the control of compliance with this Human Rights Policy, including:

- ▲ Quantitative measurement through relevant indicators.
- ▲ Qualitative analysis through mechanisms such as random employee satisfaction surveys, and detailed study of any complaints received through the ethical channel (which employees and external staff can use to report possible human rights violations).

All this is supervised by the internal audit and compliance committees.

3.4. Action

The action involves a two-way correction:

- ▲ By correcting detected human rights violations.

Prosegur provides an internal mechanism for resolving disputes if possible human rights violations are reported, and makes sure that employees and others know how to use it. The resolution process guarantees the principles of confidentiality, independence, and equality between the parties.

Any effective human rights violations that may be detected will be duly investigated and made known to the competent public authorities. All measures will also be taken to remedy any such situation and to provide for corrective / preventive measures to prevent further irregularities.

- ▲ Correcting processes or parts of processes that have been proven to be deficient or which can be improved for the protection of human rights.

Prosegur constantly strives to perfect processes through the cycle of continuous improvement. And an important part of this process is accepting and documenting what has been learned, and replanning to make the necessary adjustments to guarantee the due diligence of Prosegur in the area of human rights.