



PROSEGUR

General Standard 3P on Employee Discrimination and Harassment Complaints PCS

LABOUR RELATIONS AND ORP AREA

1. Owner

Corporate Director of Labour Relations and PRL

2. Scope

This policy applies to all countries where Prosegur is present. The Human Resources Directors of each country must be aware of, and guarantee, its application with their team, and the Global Human Resources Manager and his/her team must do so at a corporate level.

If Prosegur documents a policy or procedure at a local level in a country in order to respond to the legal requirements of this county, policy and/or local procedure, this group policy must be mentioned and it must be expressly guaranteed that the principles established therein are adhered to.

3. Object

4. Preparation and Approval

Drafted by:	Labour Relations and PRL Department				
Revised by:	Global Legal Area	Javier Aparicio Alfaro			
	Process Transformation Office				
Approved by:	Corporate Director of Labour Relations and PRL			Date:	13/12/2021
Replacing:	NG_GLO_RRHH_07_General Rule 3P on Employee Complaints of Discrimination and Harassment	Edition:	05	Date:	15/04/2016

5. Implementation

5.1. Definitions

- **Discrimination.** Discrimination and harassment in the workplace occurs when an employee is intentionally treated in a different way by the employer due to his/her race, colour, religion, sex, marital status, social condition, political ideas, union membership, nationality, disability, gender, sexual orientation (this varies by region) or age, whether at the stage of contracting, discipline, performance in duties at work, or termination.
- **Bullying ("mobbing").** Moral harassment is the phenomenon by which a person or group of people exert extreme, systematic and recurring psychological abuse on another person(s) in the work place over a prolonged period of time, with the aim of destroying the communication network of the victim(s), ruining his/her reputation, interfering with his/her work and eventually causing him/her to abandon the workplace.

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- **Sexual Harassment.** Sexual harassment is considered to be any conduct, proposition or requirement of a sexual nature that takes place within an organisation and management of a company, regarding those that the active subject knows, or is in a position of finding out, that is undesirable, unreasonable or offensive for the affected person, whose response to the aforementioned could cause a decision to be made that affects his/her employment or work conditions.
- Employees who suffer discrimination or harassment can send their complaints through the Prosegur website <https://www.prosegur.com/corp/Canal-Denuncias/index.htm>.
- The Human Resources Management of each country or corporation must spread awareness of the claims channel among the employees by the methods deemed most effective and must establish a simple procedure for intending to ensure that the claims made by employees reach the people appointed to perform the actions for their resolution.

5.2. Governing principles of action in the event of discrimination claims

- Compliance with legislation and local labour agreements.
- Protection of the dignity and confidentiality of people involved.
- Agility and promptness in the investigation into and resolution of conflict.
- Impartial audience and fair treatment for all those involved.
- Seeking truth and clarification of the actions taken place.
- Guarantee of investigative authority of the instructor when conducting the procedure.

5.3. Principles of the investigation process

- The Human Resources Director must allocate the claim to an instructor to perform the corresponding investigation process, guaranteeing its confidentiality at all times.
- All investigation processes must comply with the following principles:
 - Statement from the parties involved.
 - Practice of the evidence proposed by the parties (taking statements from the employees allocated by the parties involved as evidence to accredit their respective versions of events object of the investigation). The statements taken must be documented and, once read, must be signed by their author.
 - Investigation findings report.
 - Adoption of methods to resolve the conflict.
 - When confirming the events of the claim, corresponding disciplinary measures must be adopted regarding the person involved.

- If there are no clear elements for establishing the veracity of the events claimed, but it is concluded that there is an occupational conflict, the Human Resources Management of the country must do everything in its power to resolve the conflict.
 - Finally, if the falsity of the claim made is accredited, appropriate disciplinary measures must be taken against the claimant.
- Once the Report of action has been transferred to the Director of Human Resources, measures must be taken to resolve the conflict within a month of the receipt of the report.
 - The Human Resources Director of each country must guarantee the safekeeping of documents in a secure place and for the required period of time according to the legislative framework of each country.

6. Related documents

Code	Name