



# PCS Purchasing Policy

RESOURCE MANAGEMENT DEPARTMENT – PURCHASING

This policy was approved by the Board of Directors on 28 October  
2021

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## 1. Owner

Corporate Purchasing Director.

## 2. Scope

- It shall be applicable to and mandatory for all Prosegur Group companies and all their employees.
- All Prosegur employees and any business partners or collaborators who interact with suppliers on behalf of Prosegur must comply with this policy.
- All Directors, Managers, and Supervisors in the various business and support units, in particular, are responsible for making sure this policy is complied with.
- More restrictive criteria than those outlined in this policy may be used in a given country or region.

## 3. Purpose

- This mandatory policy applies to all purchases and procurements of goods and/or services in order to ensure a consistent sustainable procurement policy and appropriate cost management and to protect the company and our stakeholders from unnecessary risks.

## 4. Preparation and Approval

Drafted by:	Corporate Purchasing Department				
Revised by:	Global Legal Area	Javier Aparicio Alfaro			
	Process Transformation Office	Luciano Valdir H. E. da Silva			
	Corporate Purchasing Director				
	Corporate Resource Management Manager				
Approved by:	Board of Directors			Date:	28/10/2021
Replacing:	N/A	Version:	N/A	Date	N/A

## 5. Purchasing policy

- The purchasing policy shall be structured around the following principles:
  - Segregation of duties between requesting party/manager and buyer.
  - Supplier competition.
  - Transparency in the decision-making process.

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- Respect for ethical and environmental principles, as well as their promotion.
- Objectivity in tender processes and criteria.
- Strict adherence to the internal and external regulations that apply to each process.
- All purchases and contracts involving the suppliers of goods and services must be handled by the Purchasing Department of the corresponding organisational area to which the employee belongs.
- Prosegur will develop knowledge of sustainable purchasing concepts within purchasing teams so that special attention is paid to the relevant requirements from a sustainability standpoint as part of the purchasing procedures (waste generation and management, CO2 emissions, social impact of supplies, etc.)
- The requesting areas are responsible for defining and establishing the technical, commercial and business requirements of the purchase requests.
- In order to encourage transparent and competitive tendering processes, the requesting areas must avoid imposing criteria that limit the potential of competition. Furthermore, these areas will pay special attention to defining the essential requirements from a sustainability perspective, such as waste generation and management, CO2 emissions, and the social impact of supplies, when defining purchasing needs and criteria.
- The Purchasing Department must implement methods to detect, mitigate, and reduce environmental and social impacts during the supplier selection process.
- In those purchasing categories where these requirements are applicable, the criteria for evaluating supplier bids must include sustainability and environmental impact criteria of both the alternative proposals and the suppliers.
- The Purchasing Department, which is in charge of handling the negotiation process with suppliers, must negotiate bids with the assistance of the requesting area and/or the business and/or functional areas involved.
- The Purchasing Department will ensure compliance with Prosegur's Code of Ethics and Conduct and the applicable requirements on human, labour and environmental rights.
- The approval procedure varies per supply category and covers cost and quality criteria, as well as human rights, integration, and sustainability. It is also necessary to assess the risks in the supply chain, the geographical presence of the suppliers, and whether sustainability strategies and procedures are in place. Furthermore, the audits and verifications considered necessary will be performed and measures promoted to reduce the environmental impact of suppliers.
- As regards the management of Occupational Risk Prevention, the hierarchical structure of the businesses is backed by Human Resources to enforce compliance with this policy and the procedures established to prioritise occupational risk prevention, and lead by example in our commitments to health and safety.
- The Purchasing Department will negotiate and sign contracts and framework agreements.

- The Purchasing and Supply Chain Division must previously authorise the signing of any commercial agreement that includes a commitment to purchase or award a contract in the future.

## 6. Supply chain and responsible practices

- Prosegur encourages the recruitment of suppliers that meet sustainability and social responsibility criteria from companies that promote and support the United Nations Sustainable Development Goals and that have some form of ESG certification, either because they have registered in sustainable indices or through relevant certifications.
- Prosegur promotes and encourages suppliers and associates with which it collaborates to accept the following principles:
  - Respect the applicable laws of all jurisdictions where the Prosegur Group operates.
  - Operate as a socially responsible employer with a commitment to: paying a living wage to its employees that is always above the minimum wage; respecting the prevention of child labour and forced labour; respecting non-discrimination and equal opportunities; and respecting freedom of association, the right to collective bargaining and the elimination of excessive working hours.
  - Provide a safe working environment in compliance with all occupational health and safety standards.
  - Using sustainable practices that are respectful of the environment, requiring that its suppliers commit to: the use of renewable energies; actions aimed at reducing emissions and pollutants to avoid climate change; respect for biodiversity; sustainable use of natural resources; and waste reduction.
  - Understanding and complying with the Prosegur Code of Ethics and Conduct.
- Interactions with suppliers impact on the Prosegur brand image, so any employee who has contact with third parties must observe an ethical behaviour in the relationship with suppliers and their employees:
  - Ensuring equal opportunities between participating suppliers in the purchase process.
  - Ensuring transparency in communications and the information provided.
  - Ensuring objectivity when evaluating bids.
  - No contracts must be signed with suppliers involved in cases of fraud, corruption or other crimes.
  - In cases where a potential conflict of interest is detected between a Prosegur employee and a supplier, their manager, Corporate Purchasing Director, Resource Management Director and regulatory compliance office must be informed immediately. In cases where a possible fraud is detected between a Prosegur employee and a supplier, the Regional Purchasing Director, Global Purchasing Director, Regulatory Compliance and Intervention Office must be informed immediately. The contract with this supplier will be suspended immediately until the corresponding investigation has been concluded.

## 7. Related Documents

Code	Name
NG_GLO_CN_01	PCS Ethics Channel Policy