



3P General Regulation

Corporate Responsibility Policy

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Approved by:	Prosegur Board of Directors		
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The present *Prosegur Corporate Responsibility Policy* was approved during a meeting of Prosegur's Board of Directors held on 24 February, 2016.

1. Scope of Application

- The present *Prosegur Corporate Responsibility Policy* is globally applicable and binding to all entities in the Company, its actions and areas it operates in.

2. Purpose

- Prosegur believes that responsible management must play a fundamental role in corporate culture. As one of the world leaders in private security, the Company knows that while performing its activities it must focus on those matters of a social, environmental or financial nature that are relevant and influence decision-making for its stakeholders.
- The *Prosegur Corporate Responsibility Policy* aims to define guidelines for responsible business management and promotion of a corporate culture that contributes to long-term value generation for Prosegur's employees, customers, shareholders, suppliers and society in general.

3. Description

3.1. General Goals

- The Company seeks the following with the *Prosegur Corporate Responsibility Policy*:
 - To stimulate fulfilment of its strategic objectives through responsible and sustainable practices so as to be regarded as an example in the markets where it operates.
 - To establish stable and trust-based relationships with its stakeholders; relationships based on values such as customer orientation, transparency, excellence, leadership and team work.
 - To appropriately manage the risks and opportunities stemming from its activity while safeguarding the assets and interests of its stakeholders.
 - To help improve its reputation as a company that generates prosperity and comprehensive value and makes a significant economic and social difference with its activities.



- To encourage a culture that imposes strict ethical and compliance guidelines toward society whereby processes, habits and practices are constantly reviewed.

3.2. General Action Principles

- With a view to achieving the general goals of the present *Prosegur Corporate Responsibility Policy*, the Company undertakes to adopt the following general action principles:

- Compliance with Legality

Carry out its activity in accordance with the legislation in force in the countries where it operates. This includes, among others, compliance with legislation on the defence of competition and unfair competition, rules that govern anti-money laundering and their enforcement instructions and legislation on data protection and confidentiality applicable in each country.

- Commitment to Transparency

Draw up all financial information honestly, clearly and exactly, using the appropriate accountancy records to do so and transparent communications channels for disseminating it that allow the market and especially Prosegur's shareholders and investors to have it permanently at their disposal.

- Compliance with Accepted Corporate Governance Practices

Embrace good governance practices as an essential element to be able to safeguard Prosegur's business solvency and sustainability in line with good governance principles which are generally recognised in the international markets.

- Ethics and Integrity Regarded as Part of its Culture and Commitment to Society

Align Prosegur's actions with the rules defined in its Mission, Vision and Values; promote the adoption and compliance with the principles listed in the *Prosegur's Code of Ethics and Conduct*.

Prosegur is aware of the existence of several recognised international initiatives regarding conduct and ethics in private security, all sharing the same spirit of collaboration and commitment. Therefore, the Company has decided to adhere to the initiatives that show a unified approach. Specifically, Prosegur supports and promotes the Code of Conduct and Ethics of the *Ligue Internationale des Sociétés de Surveillance*, the international association of private security services companies.



○ Respect for Human Rights

Promote respect for human rights as an essential part of performing Prosegur's activities. As a leading company in the private security sector, Prosegur endeavours to respect and enforce the rights listed in the *Universal Declaration of Human Rights (UDHR)* adopted by the UN General Assembly in its practices and procedures.

○ Conservation of the Environment

Establish policies which define environmental management commitments and goals in the businesses and countries where Prosegur operates. The aim is:

- To ensure compliance with local environmental legislation.
- To ensure that its suppliers and subcontractors undertake to comply with local applicable legislation.
- To assess, measure and reduce environmental impact associated with its activity in each country while ensuring consistency with operational profitability.
- To raise the awareness of its employees with regard to care for the environment by transmitting good practices that promote sustainable development.
- To integrate the environmental management system into the *3P Management System* (acronym for "Prosegur Policies and Processes").
- To obtain certification for its environmental management system by domestic and international rules or standards (e.g. ISO 14.001) when this is required by the customers or necessary for competing in the market.

○ Fiscal Responsibility

Observe the principles of responsibility, prudence and transparency in relation to compliance with tax obligations and its relationship with tax authorities, in accordance with *Prosegur's Fiscal Strategy*.

○ Promotion of Corporate Responsibility

Actively participate in actions, bodies and other leading initiatives which promote undertakings in line with the provisions herein. For example, Prosegur supports and, as such, subscribes and disseminates the United Nations Global Compact, an international initiative that promotes the implementation of Ten Principles in



the area of human, occupational and environmental rights, and the fight against corruption.

3.3. Undertakings concerning its Main Stakeholders

○ Employees

Human capital is Prosegur's fundamental asset. In terms of services, the best guarantee of a successful relationship is being able to rely on excellent professionals. The Company knows that its greatest resource is its team members. This involves:

- Working toward consolidating the industry's status and helping society to understand, value and appreciate the social role of private security professionals.
- Promoting equality and respect amongst employees and preventing employment and occupational discrimination.
- Not employing anyone under the legal age.
- Not allowing any form of physical, sexual, psychological or verbal abuse or harassment.
- Respecting working hours and schedules, facilitating the necessary balance between professional and personal life.
- Applying utmost rigour when it comes to supervising the physical integrity and safety of all employees, in line with the standards in the area of occupational risk prevention in our sector. Also, promoting the adoption of occupational health and safety policies and assuming the preventive measures established in the current legislation of each country, guaranteeing that employees perform their work in safe and healthy places.
- Respecting the right of its employees' to trade union freedom and freedom of association and collective bargaining, in compliance with the UDHR and local laws in the countries where Prosegur operates.

○ Customers and Users

Prosegur works to build a safer world to live in. Security improves quality of life and is indispensable for any society to evolve. For this reason and with regard to its customers and users, the Company undertakes to:



- Relate to customers and users in a legal, ethical and respectful way.
- Comply with the laws and regulations applicable in relationships with customers when signing contracts and performing commercial transactions.
- Ensure appropriate confidentiality when processing customer and user information.
- Enforce contractual requirements and manage service quality and resource efficiency by making use of a common process management methodology which is the basic pillar for the *3P Management System* (promotes continuous improvement).
- Obtain accreditation for the *3P Management System* by being awarded certificates of compliance with international rules and standards. The aim is to meet customer demand or ensure that the Company distinguishes itself by its management elements.

○ Shareholders and Investors

Prosegur declares its intention of creating value in a continuous and sustained manner for its shareholders and investors. This means:

- Making communications and queries channels available to shareholders and investors to allow them access to appropriate, useful and full information on the progress of Prosegur.
- Ensuring that shareholders and investors in identical situations are treated equally.

○ Suppliers and Associates

Prosegur believes that its ethical values must apply to the entire supply chain. Consequently, it espouses the following:

- Select suppliers and associates through criteria of independence, objectivity and transparency, while balancing the Company's interest in obtaining the best conditions with the convenience of maintaining stable relationships with ethical and responsible agents.
- Work with suppliers and associates to promote respect for applicable laws, socially responsible employer conduct and the use of environmentally friendly, sustainable practices.



- Foster the observance of Prosegur's Code of Ethics and Conduct amongst suppliers and associates.

- Society

Prosegur knows that it must show integrated, business and financial but also social leadership. To this end, it works toward:

- Developing initiatives with the aim of helping to build a more caring society with fewer inequalities. The Prosegur Foundation is the channel for the Company's social and cultural activities. Aware of the local community needs, this institution carries out its own projects in countries where Prosegur operates. Its activities focus on education, social and labour integration of people with disabilities and corporate volunteering.

3.4. Communication, Participation and Dialogue Channels with its Main Stakeholders

- Prosegur fulfils the needs of its main stakeholders by keeping direct, constant and close contact with them. It provides relevant, truthful and up-to-date information through several channels. These channels include: channels that convey relevant information for employees from the bottom up (survey about work environment, performance assessment, suggestion boxes, etc.) and from the top down (on-site and online training, internal magazine, posters, etc.), *Shareholders' Office*, customer portal, customer helpline and commercial and technical visits.
- Prosegur also provides a *Whistleblowing channel* for employees and third parties to report potentially relevant irregularities in the Company, in a confidential and anonymous manner.
- Additionally, based on a combination of internal and external factors, Prosegur carries out periodic studies to identify and prioritise matters of relevance for its stakeholders.

3.5. Mechanisms for Developing, Monitoring and Supervising Corporate Responsibility Practices

- Pursuant to the *Regulations of the Board of Directors of Prosegur Compañía de Seguridad S.A.*, the former is responsible for defining the general corporate policies and strategies including the corporate social responsibility policy among others.
- The Board of Directors and/or the body which has been delegated to do so, adopts the necessary measures for ensuring appropriate enforcement and monitoring of corporate responsibility practices and strategy. So as to ensure appropriate decision-making, the Board of Directors receives an annual report generated by the area responsible for implementing the corporate responsibility



strategy. This strategy is reflected in a *Master Plan*. The annual report must contain evidence of how social, environmental and economic activities have progressed.

4. Related Documents

Code	Name
	Prosegur Code of Ethics and Conduct