

# **SIS-Prosegur (SIS-PSG) Cash Code of Ethics and Conduct**



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**This document incorporates all SIS-PROSEGUR Joint venture companies and applicable for their staff.**

SIS Prosegur joint venture companies hereinafter referred to as “SIS-PSG” (which expression shall unless it be repugnant to the context or meaning thereof be deemed to mean and include its affiliates, subsidiary, and all joint venture companies of SIS-Prosegur)

# 01. Object of the code of ethics and conduct

This Code of Ethics and Conduct (hereinafter the “Code”) sets out the principles and values that should guide the conduct of all SIS-PSG professionals. It derives from the Code of Ethics and Conduct of SIS Group enterprises and Prosegur Cash parent companies, to which SIS-PSG pertains. It therefore reflects the same behavioural principles.

In particular, it reflects our commitment to act in accordance with these principles and values every day in our dealings with all stakeholders affected by our activities: employees, shareholders and investors, customers and users, suppliers and associates, authorities, public administrations and regulatory bodies, competitors and the civilian society in which we operate.

The Code is an internal standard that defines our corporate culture, our purpose, our values and our leadership model, and sets clear guidelines for the conduct of all professionals subject to its application.

It should be noted that, although this Code does not regulate all the hypotheses or situations that may arise in our day-to-day business, the principles and values set out in it should guide and direct all our actions in matters of social order and corporate responsibility, always guided by our commitment to ethics, integrity and strict compliance with the law.

All SIS-PSG professionals are required to know and comply with this Code and to collaborate to facilitate its implementation, under the principle of “zero tolerance” to any type of illegal or unethical behaviour, which is specified in the duty, and to report any possible breach of which we are aware.

Lastly, the Code constitutes the core basis of SIS-PSG’s sustainability and corporate governance policies and is overseen by SIS-PSG’s Board of Directors and management bodies, through the Compliance Department.

The Code will be regularly reviewed and updated. To this end, it will take into account the suggestions and proposals made by professionals and the commitments made by SIS-PSG in terms of sustainability and good governance.



## 02. Who is bound by it and what its scope of application is



This Code is binding and applies to members of the Board of Directors, senior management and in general, without exception and regardless of their position, responsibility, occupation or geographical location, to all SIS-PSG employees.

The Code is, therefore, unique for the whole of SIS-PSG and is applicable to all business and activities carried out in all offices of SIS-PSG.

The persons subject to the Code referred to above (hereinafter the “Subject Persons”) have the duty to know and comply with it, notwithstanding the special duties incumbent upon those persons who are subject to other codes or specific duties inherent to the position or activity they hold. Without prejudice to the foregoing, the application of the Code shall in no case entail a breach of the applicable legal provisions. In such circumstances, the content of the Code shall be interpreted in accordance with the provisions of the aforementioned legal provisions, which shall prevail.

### **Obligation of executives and managers**

Executives and managers play a vital role in developing a culture of compliance with the law and respect for SIS-PSG’s principles and values. Due to their position, they have the obligation, in addition to all those contained in this document, to promote ethical conduct and compliance with the law among SIS-PSG professionals, leading by example. Executives and managers shall take the necessary measures to prevent, detect and respond to issues related to compliance with the Code.



### 03. Acceptance, compliance and communication

All Subject Persons accept the rules contained in the Code and, in particular, the ethical principles and rules of conduct contained therein, and undertake to comply with it and to ensure compliance with it.

We have no excuse for improper conduct due to ignorance of this Code or when acting upon the orders of a superior. Accordingly, we know that whoever, by action or omission, breaches the Code shall be subject to the relevant disciplinary measures in accordance with prevailing labour standards and internal policies and procedures.

If any SIS-PSG professional has any questions about the interpretation or application of the Code,

they can raise it with their immediate hierarchical superior. They can also go to the Human Resources Department or the Compliance Officer in charge of ensuring the regulations are properly observed.

By way of exception to the foregoing, the CEO on behalf of the Board of Directors shall be responsible, following a report from Compliance Head, for resolving any doubts about its application raised by directors, and deciding how to handle any complaint affecting a member of the Board of Directors. It may entrust the investigation to a third party outside SIS-PSG, as a guarantee of independence, when deemed appropriate.



This document is communicated through the Human Resources Department, which is also responsible for providing to all employees the training required to ensure familiarity with it. A copy is permanently available on at the SIS-PSG website, [www.sisprosegur.com/](http://www.sisprosegur.com/)

## 04. What to do if we detect non-compliance: duty of disclosure and penalties



We make every effort to achieve the highest levels of compliance and integrity when undertaking our activity and to ensure that all SIS-PSG professionals are aware of the importance of acting at all times with the utmost respect for the law and SIS-PSG's internal rules, including this Code, to reduce as far as possible the risk of non-compliance with regulations in our organisation or other conduct that is not aligned with SIS-PSG's principles and values.

Thus, all Subject Persons must carry out their professional activity in accordance with the provisions of this Code, which must always be present when performing their professional duties, and with any other internal policies and rules established in SIS-PSG to prevent any unlawful and/or criminal activity that contravenes the principles and values of SIS-PSG.

Following on from this, in order to prevent or,

where appropriate, detect any irregular conduct that may occur at any of SIS-PSG's hierarchical levels, all Subject Persons must inform, report and collaborate in the investigation of possible risks or breaches of the Code, as well as of any other internal regulations, and/or of any action that could be considered illegal or criminal of which we are aware or suspect.

We know that our contribution is essential to the culture of compliance at SIS-PSG. For this reason, if we detect any conduct that could be considered inappropriate, we take the necessary precautions and steps to study the facts of the case by opening an enquiry process to be conducted by a team of impartial experts, who will present their findings and propose any corrective measures that may need to be taken.

It should be borne in mind that any breach of the Code, of any other internal rules or policies and/or legal or conventional rules in the performance of our professional duties may be considered a breach of employment law that may be subject to penalty, in accordance with the applicable regulations.

We know the different channels we can use to immediately communicate the problems we detect and provide all the information we have available in this regard. They can be, as we deem appropriate:

*Our immediate hierarchical superior*

*The Human Resources Department*

*The Compliance Officer*

*The Ethical Channel that SIS-PSG keeps permanently open, which allows the confidentiality required for each situation and the anonymity necessary to guarantee the integrity of the people who use it to be preserved.*

Complaints involving a member of the Board of Directors shall be sent to the CEO, who following a report from the Compliance Head, may decide how to deal with them.





## 05. DNA of the SIS-PSG brand

This Code establishes the principles that must govern the activity of the professionals who form part of SIS-PSG. These precepts are framed by our Purpose, Values and Leadership Model.

We all have a purpose in life, and so does SIS-PSG.

“We make the world a safer place by taking care of people and businesses, keeping us at the forefront of innovation”. Every day we do our best to protect what our customers value most. And sometimes we even save lives. Our teams are motivated to make their work - and that of our customers - safer and more efficient by continuously improving our processes and applying the latest technology.

Similarly, SIS-PSG’s values are the main beliefs that guide our behaviour and decisions in all business areas and the brand.

### **We care about people**

Our passion is to protect others, whether customers, the planet or our colleagues.

We work to put people at ease in their environment, both physical and digital, with the aim of having a positive impact on their personal and working lives, fostering empathy and transparency in favour of collaboration and efficiency.

### **We think positive**

We believe in highlighting the positive, not the dangers. We don’t use fear to achieve our goals.

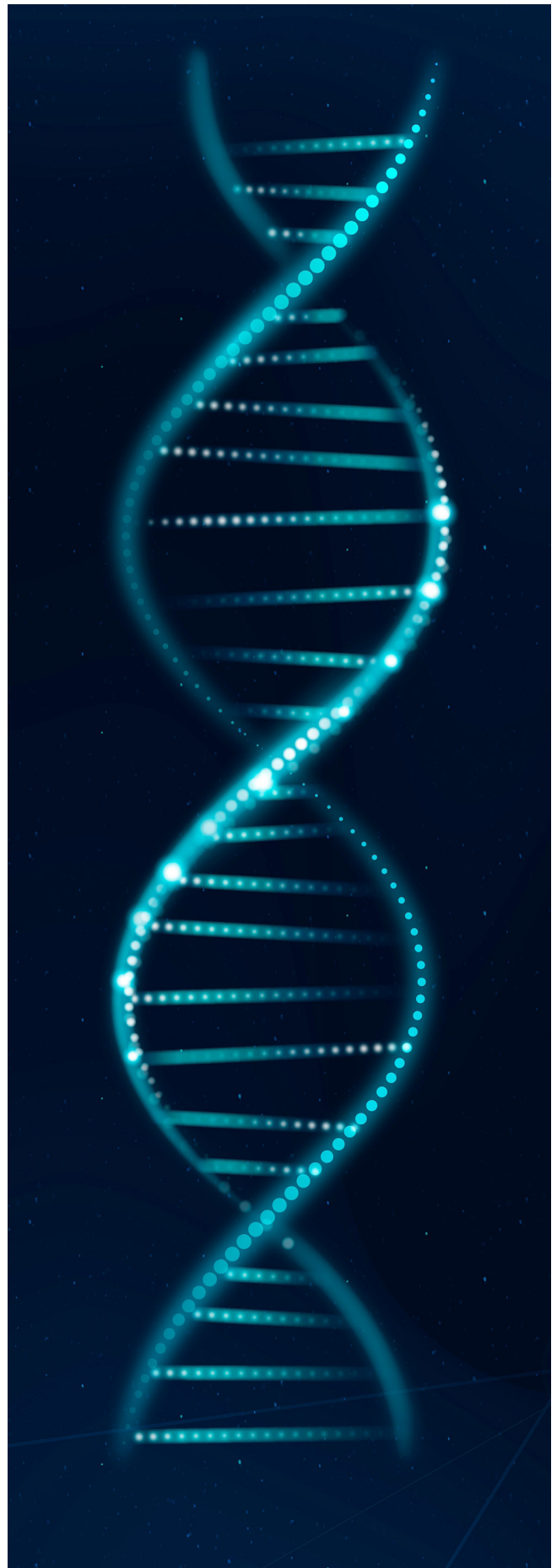
We only look back if it is to pick up momentum. We learn from our mistakes and offer constructive opinions.

We’re proud of our work, but we’re not arrogant. We highlight our qualities. We celebrate our achievements and honour our heroes.

### **We are unstoppable guided by entrepreneurship spirit**

We never say: “no, this cannot be done” without suggesting an alternative.

We keep our feet on the ground and our eyes wide open. There is always a better, safer and more



efficient way to address a challenge. There are always more questions to ask and more innovative solutions to offer. We combine our expertise with the most innovative technology to propel not only ourselves, but the entire industry, forward.

Finally, we are aware of the importance of having a Leadership Model. We know that any change always starts with people. That's why we've designed a cross-cutting Leadership Model to drive cultural transformation.

#### **Passion**

We achieve internal and external customer satisfaction by taking on new challenges and generating value for the business and the customer, as well as building a lasting relationship of trust to exceed their expectations.

#### **Focus on Results**

We act with perseverance, ambition and integrity to secure the best results without losing sight of our values.

#### **Transformation and Innovation**

Based on a listening attitude and an open mind, we strive for continuous improvement, think big and act with determination, curiosity and agility when driving change, all while accepting that errors are part of the learning process.

#### **Team working approach**

We foster talent and meritocracy, creating an inspiring and healthy working environment, while ensuring that our teams have autonomy when it comes to decision making. We encourage confidence, take calculated risks and continuously exchange feedback to ensure constant professional growth. We are generous and we build teams with colleagues from a range of different areas. We are nourished by a diversity of cultures.

#### **Integrity and Commitment**

We take responsibility for our work with humility and transparency to achieve objectives, while responding to any changes with a flexible, mature and proactive approach that leads by example.

At SIS-PSG, we integrate the United Nations Sustainable Development Goals in our work and promote them through the following principles: we are committed to reducing our environmental impact, promoting quality employment, caring for the health and safety of our workers, complying with current regulations and good governance criteria, and respecting human rights.

## 06. General Principles

### 6.1. Compliance with the law and corporate regulations

One of SIS-PSG's main priorities is compliance with current industry and national regulations.

We comply with the laws in force where we operate, and promote a culture of ethical behaviour in all our actions. We also comply with SIS-PSG's corporate regulations, policies and its rules of conduct.

We do not collaborate with third parties in breaking any laws, nor do we engage in any actions that call into question our commitment to compliance with the law.

We perform our activities in accordance with applicable legislation in the area of unfair competition and defence of competition, developing solely strictly legal and ethical practices.

We comply with the rules provided in the area of prevention of money-laundering and the instructions given on application of the same.

### 6.2. Personal data protection and privacy

At SIS-PSG, we are committed to handling personal information in a responsible manner and complying with national regulations.

SIS-PSG employees who have access to such personal data must safeguard them, observing the legal and appropriate ways of using them and may not share them with other people who do not need to know them.

We comply with the following principles when processing personal data:

- Principle of lawfulness and transparency
- Principle of limitation of purpose
- Principle of data minimization
- Principle of accuracy
- Principle of exercising Data Protection Rights
- Principle of limitation of the retention period
- Principle of data security
- Principle of proactive responsibility

At SIS-PSG, we understand training to be the cornerstone of our organisational culture, which is why we have at our disposal training actions, awareness and sensitisation courses on this regard, with the main objective of knowing our duties and obligations in the field of privacy. At SIS-PSG, we understand that "protecting personal data is everyone's responsibility".

SIS-PSG wants to be transparent, both with employees and with customers and trusted suppliers involved in carrying out its activity. For





this reason, it has created a space on the website [www.sisprosegur.com](http://www.sisprosegur.com) in which it makes available to all our stakeholders our privacy policies in which they are clearly and transparently informed of how we process their personal data, and the purpose of such processing, taking into account the different nature of the type of services provided, complying with all the legal requirements and demands established by the applicable regulations in force.

In addition, we have various channels enabled to attend to exercising data protection rights, communicating possible security breaches, as well as a specific channel to contact the SIS-PSG Compliance Officer, which are permanently available to all our employees

**“SIS-PSG wants to be transparent, both with employees and with customers and trusted suppliers involved in carrying out its activity”**

### **6.3. Money laundering and terrorism financing prevention**

SIS-PSG complies with anti-money laundering and anti-terrorist financing laws applicable to its activities. In SIS-PSG's business relations, all employees have a duty to pay special attention to any signs of activities related to money laundering and/ or the financing of terrorism.

If an employee detects any situation related to money laundering and/or the financing of terrorism, he/she must immediately inform Compliance Officer, via the e-mail address: [whistleblower@sisprosegur.com](mailto:whistleblower@sisprosegur.com).

### **6.4. Respect for human rights**

We promote respect for human rights as an essential part of performing our activities.

We support the human rights standards (ILO Declaration) and ensure that company operations adhere to these standards. Thus, in accordance with local legislation and practice we respect freedom of expression. SIS-PSG adheres to employment as Employee's free choice with no use of forced or child labour and we don't discriminate on the basis of gender, colour, ethnicity, culture, religion, cast, sexual orientation or disability.

### **6.5. Gender equality**

Human capital is the most essential asset of SIS-PSG. That is why we promote the principle of equality between men and women.

We ensure that the right to equal treatment and equal opportunities for men and women is implemented, so that no one is discriminated against on the basis of gender in employment or occupation.

SIS-PSG is committed to provide fairness in employment opportunities and has zero tolerance towards discrimination of any kind. We make employment decisions on the basis of an individual's merits and company needs. No decisions are ever made based on gender, race, cast, ethnicity, religion, age or other improper characteristics. Equal opportunity is provided for career progression and no decisions are ever influenced by considerations other than employee's performance, capability and aptitude. Employees are also provided with the opportunity to develop their potential and to develop their careers further within the company through a transparent, objective and analytical Performance Appraisal and Management Process.

### **6.6. Respect between employees and non-discriminatory treatment**

Show respect for your colleagues and business partners; never act improperly towards them. We are obliged to treat our colleagues, our superiors and our subordinates in a fair and respectful manner. We do not allow any form of physical, sexual, psychological or verbal abuse or harassment.

We ensure the absence of any kind of discrimination in our environment, giving special protection to any group considered vulnerable, by respecting individual differences and privacy.

Following on from this, SIS-PSG promotes diversity among employees and guarantees equal opportunities in access to work and professional promotion, to which end we offer our professionals tools to promote integrating people in vulnerable situations into the labour market. Likewise, relations with our suppliers' employees and associated entities are based on professional respect and mutual cooperation.

### 6.7. Protection of minors

At SIS-PSG, we are firmly committed to the protection of minors and all that this entails, with the aim of preserving the rights and freedoms of minors, as well as ensuring that all our professionals have been able to complete their compulsory education. We do not employ anyone under the legal age.

### 6.8. Fight against bribery and corruption

We make our position clear: zero tolerance for corruption. We advocate transparent, fair, respectful and ethical relationships that protect the legitimate interests of all stakeholders. SIS-PSG avoids, refuses, pursues and raises awareness of any corrupt conduct.

In the performance of our duties at SIS-PSG we do not offer, grant, request or accept, directly or indirectly, bribes, gifts or donations, favours or compensation, in cash or in kind, whatever their nature, to public or private entities, which may influence the decision-making process.

Nor do we make payments for facilitating or speeding up processes to ensure or speed up the progress of an operation or action before any legal authority, public administration or official organisation.

### 6.9. Sustainability criteria and preservation of the environment

The preservation of the environment is one of the basic pillars of our performance, which is embodied

in compliance with the highest standards of our industry in this area. We are committed to acting at all times in accordance with criteria of respect and care for the environment, adopting habits and conduct consistent with the best environmental practices.

To do this, in carrying out our activity, we identify the main existing environmental risks and develop specific action plans to mitigate the effects that SIS-PSG may have on the environment.

### 6.10. Appropriate use of information and technologies.

Guaranteeing information security is a priority for SIS-PSG. At SIS-PSG, we are firmly committed to regulatory compliance in the field of protection of confidential information, know-how, trade secrets and intellectual and industrial property in order to avoid acts of unfair competition in the context of our commercial activity.

Respect for the principles of equality and non-discrimination among employees is a crucial aspect for SIS-PSG. We therefore make appropriate use of new technologies and ensure that their use does not perpetuate biases and avoids algorithmic discrimination on the basis of race, cast, ethnicity, religion, gender, sexual orientation, disability or any other status.

At SIS-PSG we are committed to innovation and we incorporate the latest technology into our range of products and services.



### 6.11. Commitment to society

We know that our leadership must be holistic, not only in the business and financial spheres, but also in the social sphere. We assume the ethical commitment to being concerned about what surrounds us, in other words: a complex society where social demands exceed conventional concepts and are seen in very different contexts. Our ultimate goal is to contribute to creating a society with more opportunities and more solidarity.

We work in partnership with several local, national and international charities to help address the social and environmental needs of the communities in which we operate.

To do this, we channel our social action projects into education, the occupational and social integration of people with disabilities and the promotion of corporate volunteering through different means including the SEWA Trust.

### 6.12. Ethical management and leadership

All SIS-PSG executives and managers have a duty to promote ethics and integrity, especially among employees under their responsibility. In this regard, we emphasise the importance of complying with the law, conducting ourselves ethically and transparently, and leading by example.





## 07. Rules of conduct in the performance of our activities

### 7.1. Professionalism, responsibility and cooperation at work

All Subject Persons must at all times maintain a professional and responsible conduct with their own decisions and actions, in addition to carrying out our work using both our technical capacity and the appropriate prudence and care, in order to achieve the best performance of the functions entrusted to us in accordance with the highest levels of quality, with the law and with the internal rules and other procedures established by SIS-PSG.

Subject Persons must foster a working environment of cooperation and teamwork, we must act at all times in a spirit of collaboration and make available to our colleagues the knowledge and resources that may facilitate the achievement of SIS-PSG's objectives and interests.

### 7.2. Work-life balance



Subject Persons promote a working environment and climate that is compatible with the personal and family life of employees, collaborating with the people in their teams to reconcile

family responsibilities and personal needs with professional demands in the best possible way.

### 7.3. Occupational health and safety

It is essential that we create and maintain a safe occupational environment and prevent accidents in our place of work. For this reason, we apply utmost rigour when it comes to supervising the physical integrity and safety of all, in line with the highest standards in the area of occupational risk prevention in our sector.

We carry out our work in safe and healthy places, we promote the adoption of occupational health and safety policies and we assume the preventive measures established in the legislation in force in each location.

Before starting a new activity, operation or project, selling a new product or service, or acquiring a new business, we assess the health and safety risks for the people directly involved and ensure that they are properly prevented.

### 7.4. Information Security

We are aware of the importance of protecting SIS-PSG's information, as well as the personal data of our employees, customers and suppliers.

Therefore, at SIS-PSG, we adapt our security measures to the level of risk of the type of processing we carry out, and we apply our own methodology that allows us to evaluate and monitor the security measures implemented in our



information systems, with the aim of guaranteeing at all times the availability, confidentiality and integrity of the information of our employees, clients and suppliers.

### **7.5. Confidentiality and accuracy of information**

SIS-PSG considers information to be a strategic asset, which must be treated by all with responsibility and respect for the measures established in each case to safeguard its confidentiality.

Unless otherwise indicated, all information to which the Subject Persons have access in the performance of their duties is the property of SIS-PSG and is considered reserved and confidential information.

SIS-PSG employees have access in multiple ways to confidential information related to business and ways of working. Such confidential information may not be disclosed.

Subject Persons must maintain professional secrecy regarding any data of non-public nature of which we become aware as a result of our professional activity, whether it originates from or refers to SIS-PSG, its employees or any other third party.

In a competitive market, it is possible that third parties may seek non-legitimate access to SIS-PSG's confidential information. In particular, all Subject Persons undertake to:

- a. Use confidential information exclusively for the performance of our professional activity at SIS-PSG and only provide it to other SIS-PSG professionals who need to know it for the same purpose.
- b. Maintain the strict permanent duty of confidentiality of the information to which we have access in the course of our work at SIS-PSG, even after our professional relationship with SIS-PSG has ended.
- c. Not to use confidential or secret information of any third party in the course of our work without their permission.
- d. Confidential information may only be shared with persons directly involved in the process, must not be used beyond what is necessary to perform our professional activities in SIS-PSG and never for private purposes or for personal gain.

- e. When handling confidential information in public places, we will exercise due care and extreme caution to safeguard its confidentiality.
- f. As a measure to preserve the confidentiality of SIS-PSG's information, our access codes to SIS-PSG's systems must be protected and kept, and may not be disclosed to third parties or other collaborators.

Subject Persons promote the truthfulness of the information we use when performing our duties as a basic principle that must govern all our actions at SIS-PSG. Therefore, we must convey truthfully all the information we have to communicate, both internally and externally. Under no circumstances shall we knowingly provide incorrect or inaccurate information that may mislead the recipient and cause damage or harm to the image or reputation of SIS-PSG.

### **7.6 .Use and protection of resources**

We use SIS-PSG's resources in a responsible and appropriate way in our professional environment. Likewise, we protect them and avoid any inappropriate use that could be detrimental to the interests of SIS-PSG. In the use of SIS-PSG's computer systems and information technologies, Subject Persons must take extreme security measures and strictly comply with the rules of use and policies established for this purpose by SIS-PSG.

### **7.7. Social media use**

SIS-PSG employees must pay attention to the correct use of social media, in accordance with the following guidelines:

Employees may not disclose information about SIS-PSG through social or traditional media unless they have the authorisation of those responsible for doing so.

It is not permitted to use social media to criticise customers, competitors, suppliers, SIS-PSG, other employees or third parties belonging to other SIS-PSG stakeholders.

We are prohibited from generating situations that may pose legal or reputational risks for SIS-PSG, as well as those that compromise its safety and security, as well as that of our customers and the general public.



### 7.8. Corruption and bribery: gifts and hospitality

SIS-PSG firmly and rigorously rejects any form of corruption, bribery or extortion, and rejects any practice that contravenes the law or the principles and rules of conduct contained in this Code, which seeks to illegitimately influence the will of individuals to obtain a benefit or advantage of any kind.

The general principle of prohibition of receiving, promising, accepting and offering, within the framework of our professional performance, objects, services, benefits or favours, in order to obtain a benefit or advantage for oneself or for SIS-PSG, especially those that may compromise the independence and impartiality of clients, civil servants, public employees or any other person with whom we have professional relations, applies.

In any case, we are prohibited from giving gifts, hospitality, promotions, invitations or presents to clients, civil servants, public employees and, in general, to any person with whom we have

professional relations, except for those which, being sporadic, are of little value, are reasonable and in accordance with the practices, uses and customs of our country and/or locality and respond to legitimate interests. Exempted from the above general prohibition are “permitted courtesies” with the following characteristics:

- They are in accordance with applicable domestic laws and regulations at the time and in each location;
- They are of reasonable, symbolic or economically little value and,
- They are not contrary to the values and principles of ethics and transparency contained in this Code.

Only such gifts, entertainment and other hospitalities are permitted to be extended to customers and associates, which are appropriate to business relationship but do not strictly constitute an incentive for business interests or improper conduct or lack of compliance.

On appropriate occasions, exchanging modest gifts, entertainment or extending hospitalities can help us form or strengthen relationship with our business partners. While a small gift can be a gesture of goodwill and a business dinner may provide an opportunity to know a customer better, inappropriate gifts or other hospitalities suggest improper influence in business transactions and indicate attempts to conduct business using illegitimate tactics. On all occasions such as major festivals, New Year’s Day, etc., appropriate gifts are to be approved by COO and distributed to employees for extending the same to customers/ business associates.

SIS-PSG employees may only receive gifts, presents, hospitality, promotions, invitations and gifts that:

- Originate from or have as their origin or purpose a professional focus.
- Have an economic value that is within the amounts authorised by SIS-PSG’s internal regulations
- Are proportionate, reasonable, sporadic and in accordance with the customs and practices of the place and environment in which they occur.
- At no time should gifts or presents given, offered or received be concealed or unduly influence the decision-making capacity,



objectivity and impartiality of their senders and/or recipients, or bring undue benefits to them.

Before any SIS-PSG employee offers or accepts a gift or present, he/she must request the corresponding authorisation from his/her superior, who will assess whether the offer or acceptance of the gift or present is compatible with the provisions of this Code and, in the event of doubt, will refer the matter to the Compliance Officer.

### **7.9. Political activities and contributions**

SIS-PSG does not carry out activities in favour of political parties, i.e. it does not participate in political campaigns or support any candidate or party. Nor does it make contributions or donations to candidates, parties or political campaigns. The granting by SIS-PSG of any aid or contribution, monetary or otherwise, to political parties or candidates is prohibited.

Employees who wish to participate in any type of political activity, through our membership, collaboration, contribution or support to parties,

entities, institutions or associations with political aims, must do so in a personal capacity, without requesting help, support, participation, financing or any type of involvement from SIS-PSG, in such a way that it is clear that this relationship is in a personal capacity, so that it cannot be attributed in any case to SIS-PSG.

Associations, collaborations, participations, contributions and support to candidates, political parties or campaigns and, in general, to entities, institutions or groups to which SIS-PSG employees are linked in a personal capacity, must be carried out in such a way that it is clear that this relationship is in a personal capacity, so that it cannot be attributed in any case to SIS-PSG. All political activity should take place outside the work environment and outside working hours.

### **7.10. Social content projects and sponsorships**

In order to comply with SIS-PSG's commitment to transparency, any collaboration or sponsorship carried out by SIS-PSG, in addition to being duly recorded in SIS-PSG's accounts and records, and having the express internal and external



authorisations that may be required, may only be carried out with organisations or institutions with lawful purposes, not linked to any political party and whose purpose is not political, and which have an appropriate organisational structure to ensure the proper administration of the resources provided by SIS-PSG. The main objective of such partnerships or sponsorships must be to strengthen the reputation and image of our brand and our commitment to society.

#### **7.11. Financial Information: books and records**

We prepare financial information in a full, clear and accurate manner, using appropriate accounting records that are always available to internal and external auditors.

We disseminate this information through transparent communication channels that enable the market, and in particular our shareholders and investors, to have it permanently at their disposal.

Accounting records are important for SIS-PSG's operations and business decisions, and all employees involved in this process are responsible for ensuring that these records are accurate, up to date, truthful and complete.

When creating business, financial and accounting records, we must ensure that we are following all laws, regulations and standards applicable to SIS-PSG

#### **7.12. Conflicts of interest**

We are aware that none of the activities that we perform at work or in our spare time should come into conflict with our responsibilities at SIS-PSG.

In all of our personal, professional and commercial relationships, and also in any hiring processes that we may be involved in, we make use of good criteria to avoid conflicts of interest and, in any case, we exhaustively apply the policies developed by SIS-PSG in this regard. In the event of a potential conflict of interest, we must notify the Compliance Officer, who will assess and determine the existence of the conflict of interest and, where appropriate, the measures to be taken.

Before accepting any public position or carrying out professional activities outside SIS-PSG or any teaching activity, we must inform our hierarchical superior and the Human Resources Department, so

that they can identify any possible incompatibilities or restrictions on exercising them.

#### **7.13. Intellectual and industrial property rights**

All Subject Persons must respect the intellectual property and the right of use that corresponds to SIS-PSG in relation to courses, projects, computer programmes and systems, equipment, manuals, knowledge, processes and, in general, any work or project developed or created by SIS-PSG, whether as a result of its professional activity or that of third parties.

Subject Persons must also respect the intellectual and industrial property rights held by third parties outside SIS-PSG and, in particular, may not incorporate, use or employ any type of physical or electronic information or documentation belonging to a third party obtained without the due consent of its owner.

#### **7.14. Shareholders and investors**

We commit to creating sustainable, long-term value for our shareholders. All shareholders are communicated to openly and transparently, within the bounds of commercial confidentiality and regulatory limits. Major shareholders of SIS-PSG are SIS Group and Prosegur Cash.

We declare our proposal of creating value in a continuous and sustained manner for our shareholders and investors. We make communications and queries channels permanently available to allow them access



to appropriate, useful and full information on the progress of SIS-PSG, within the framework of equality in dealings with shareholders and investors in identical conditions.

#### **7.15. Customers and users**

We relate to our customers and users legally, ethically and respectfully, whether they are public or private entities. In particular, we comply with applicable laws and regulations in our dealings with these groups when signing contracts and, in general, in all our business transactions with them. We promote our products and services in accordance with SIS-PSG's policies, as per the principles set out in this Code.

#### **7.16. Suppliers and associates**

We select our suppliers and associates according to criteria of independence, objectivity and transparency, reconciling our legitimate business interest in obtaining the best conditions with the convenience of maintaining stable relationships with ethical and responsible collaborators. We comply in all cases with the applicable procurement rules and policies.

We do not engage family members, former employees or close friends as suppliers, unless we have the written approval of the respective local Procurement Committee Manager and such engagement is objectively the best purchasing option for SIS-PSG.

We must not offer, solicit or accept any benefits, compensation, favours or considerations that could compromise our independence and objectivity in the selection and contracting process of suppliers and associates.

We may not, either directly or indirectly, accept gifts, promotions, meals, or any kind of gifts or invitations from suppliers or associates, except those covered by section 7.8 of the Code. At SIS-PSG, we expect our suppliers and partners to respect the following principles:

- Comply with applicable laws.
- Operate as a socially responsible employer and offer a safe working environment.
- Apply sustainable practices that respect the environment.
- Respect SIS-PSG's Code of Ethics and Code of Conduct

#### **7.17. Authorities, public administrations and regulating bodies**

We act under the principles of legality, loyalty, cooperation, truthfulness, transparency and good faith in our relations with the authorities, public administrations and regulatory bodies.

#### **7.18. Competitors**

We compete actively in an ethical and loyal manner paying special attention to the rules for defence of competition. We promote free competition for the benefit of our customers, consumers and users.

We do not use misleading advertising or advertising that smears our competition. We obtain information about our competition in an ethical manner and in compliance with applicable regulatory provisions.





## 08. Validity and updating of the code of conduct



This Code was approved at the meeting with CEO of SIS-PSG held on 3rd February 2023 in Delhi, and is deemed to be updated periodically.

The amendments made to the Code shall be approved by CEO, following a proposal by the Compliance Head, and shall be applicable as of the day following their communication to all Subject Persons.

## 09. Code of Ethics Acknowledgment

I acknowledge that I have received the Code of Ethics (the “Code”).

I am responsible for familiarizing myself with the standards it establishes.

I am aware of my duty to seek guidance when unsure of the proper course of action.

I understand the company’s expectations that I

- act with honesty and integrity when conducting company business and
- follow fully and abide by the standards set out in the Code.

I understand that if I breach the standards in the Code, I can be subject to disciplinary actions, up to and including termination of employment. In addition, I understand that certain breaches could result in civil or criminal prosecution.

I understand that I have an on-going obligation to notify the company if I become aware of any breaches of this Code by me or any person, or personal conflicts of interest at any time in the future.

Name of the Employee :-

(Signature)

Registration number:

Date :-

# **SIS-Prosegur (SIS-PSG) Cash Code of Ethics and Conduct**

