PROSEGUR

Prosegur Code of Ethics and Conduct

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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 Prosegur professionals[1].

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.

01. Object of the code of ethics and conduct

All Prosegur 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 to report any possible breach of which we are aware.

Lastly, the Code constitutes the core basis of Prosegur's sustainability and corporate governance policies, and is overseen by the Board of Directors and Prosegur's 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 Prosegur in terms of sustainability and good governance.

1. This refers to "Prosegur Compañía de Seguridad S.A." and all companies directly or indirectly controlled by this company, in all countries where we are present, except for "Prosegur Cash, S.A." and the companies directly or indirectly controlled by the latter, to whose professionals their own Code of Ethics and Conduct shall apply.

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 Prosegur employees.

The Code is, therefore, unique for the whole of Prosegur and is applicable to all business and activities carried out in all countries in which Prosegur is present.

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 Prosegur'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 Prosegur 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.

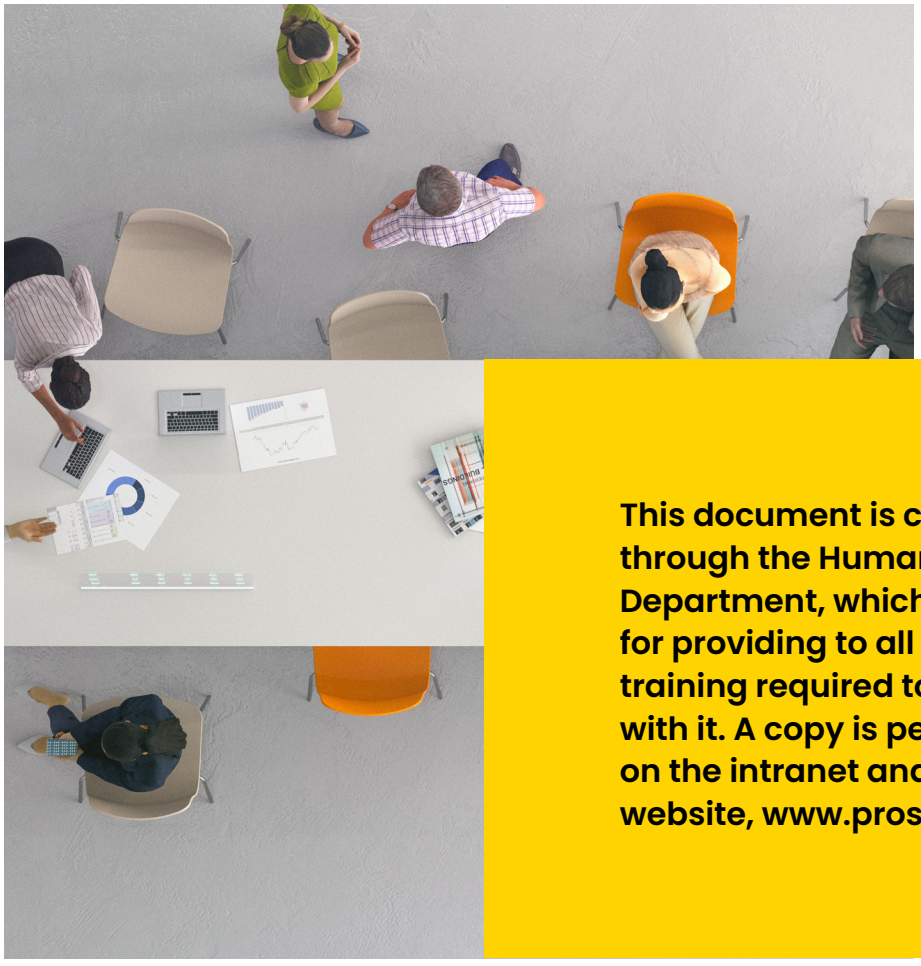
03. Acceptance, compliance and communication

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 Prosegur 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 Board of Directors shall be responsible, following a report from the Sustainability, Corporate Governance, Appointments and Remuneration Committee, 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 Prosegur, 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 the intranet and at the Prosegur website, www.prosegur.com

2 Corporate Human Resources Department Calle Herberto Gut, 12. 28007 Madrid – Spain.
Compliance Department Calle Herberto Gut, 12. 28007 Madrid – Spain.

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 Prosegur professionals are aware of the importance of acting at all times with the utmost respect for the law and Prosegur'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 Prosegur'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 the other internal policies and rules established in Prosegur to prevent any unlawful and/or criminal activity that contravenes the principles and values of Prosegur.

Following on from this, in order to prevent or, where appropriate, detect any irregular conduct that may occur at any of Prosegur'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.

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

We know that our contribution is essential to the culture of compliance at Prosegur. 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 a 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 Prosegur keeps permanently open on the website **https://www.prosegur.com/canal-etico**, 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 Secretary of the Board of Directors, who shall report them to the Board of Directors so that, following a report from the Sustainability, Corporate Governance, Appointments and Remuneration Committee, it may decide how to deal with them.

05. DNA of the Prosegur brand

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

We all have a **purpose** in life, and so does Prosegur. "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, Prosegur'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.

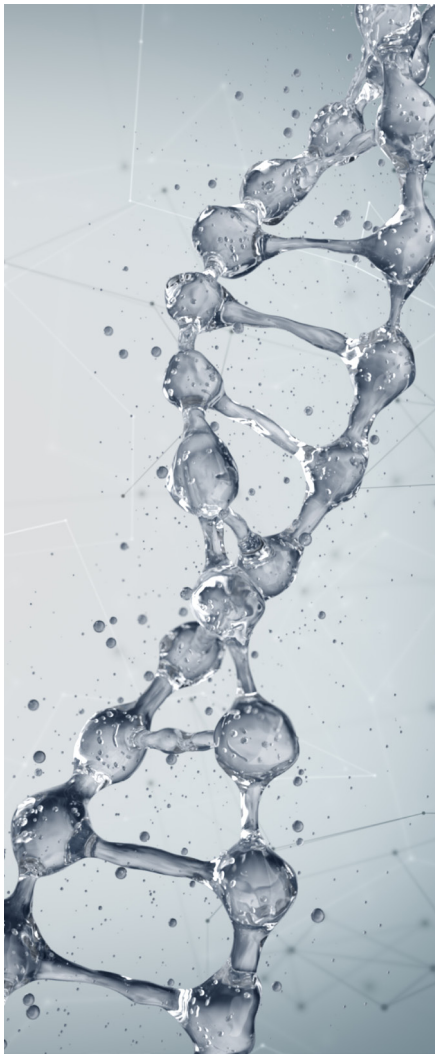
We work to put people at ease in their environment, both physical and digital, with the aim of having a positive impact on their personal and working lives, fostering empathy and transparency in favour of collaboration and efficiency.

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's 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.



05. DNA of the Prosegur brand

We are unstoppable

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 new global and cross-cutting Leadership Model to drive cultural transformation.

Passion for Customers

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 spirit

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 a global company, nourished by a diversity of cultures.

Responsibility 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 Prosegur 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 Prosegur's main priorities is compliance with current industry, national and international regulations.

We comply with the laws in force in the countries where we operate and promote a culture of ethical behaviour in all our actions. We also comply with Prosegur's corporate regulations 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 Prosegur, we are committed to handling personal information in a responsible manner and complying with national and international data protection legislation, as well as with the confidentiality commitments applicable in each country.

Prosegur 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.

06. General principles

We comply with the following principles when processing personal data:

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

In order to guarantee compliance with data protection regulations, and to be able to monitor the measures and controls established, at Prosegur we have implemented a privacy management system that allows us to centrally manage compliance with our duties and obligations in terms of privacy.

Likewise, at Prosegur 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 privacy, with the main objective of knowing our duties and obligations in the field of privacy. At Prosegur, we understand that "protecting personal data is everyone's responsibility".

Prosegur 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 **https://www.prosegur.com/politica-privacidad** 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 local or international regulations in force in the field of privacy.

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 Prosegur Data Protection Officer, which are permanently available to all our employees.

> **“ Prosegur 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

Prosegur complies with anti-money laundering and anti-terrorist financing laws applicable to its activities. In Prosegur'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 his/her line manager or Prosegur's Money Laundering and Terrorist Financing Prevention Unit, via the e-mail address: **blanqueodecapitales@prosegur.com**. Employees can also report suspected money laundering and terrorist financing offences through the Ethics Channel.

6.4. Respect for human rights

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

As a benchmark company in the private security sector, we take care to respect in our practices and procedures the rights set out in the Universal Declaration of Human Rights, adopted by the United Nations General Assembly.

6.5. Gender equality

Human capital is Prosegur's key asset. 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.

6.6. Respect between employees and non-discriminatory treatment

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, Prosegur 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 Prosegur, 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. Prosegur avoids, refuses, pursues and raises awareness of any corrupt conduct.

In the performance of our duties at Prosegur, 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 Prosegur may have on the environment.

6.10.
Appropriate use of information and technologies

Guaranteeing information security is a priority for Prosegur. As part of its business strategy, Prosegur has an Information Security Policy to protect the group's assets, processes and information, as well as its customers and employees.

At Prosegur we are firmly committed to regulatory compliance in the field of protection of confidential information, know-how, business 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 Prosegur. We therefore make appropriate use of new technologies and ensure that their use does not perpetuate bias and avoids algorithmic discrimination on the basis of race, ethnicity, religion, gender, sexual orientation, disability or any other status.

At Prosegur we are committed to innovation and we incorporate the latest technology, such as artificial intelligence (hereinafter "AI") into our range of products and services.

AI is the ability of machines to use algorithms, learn from data and use what they learn to make decisions in the same way as a human being would.

At Prosegur, we have implemented a responsible artificial intelligence management model that guarantees that technological acquisition and/or development projects that incorporate AI technology comply with the law and respect our values and the rights and freedoms of all persons who may be affected by the use of AI solutions and technologies.

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.

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 the Prosegur Foundation.

6.12. Ethical management and leadership

All Prosegur executives and managers have a duty to promote ethics and integrity, especially among employees under their responsibility. In this regard, they should emphasise the importance of complying with the law, conducting themselves 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 Prosegur.

Likewise, 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 Prosegur'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.

In order to ensure the work-life balance of our employees, we respect established working hours, rest time, leave and holidays, so that we try not to contact them outside working hours, fully guaranteeing their right to digital disconnection.

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 country.

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 Prosegur's information, as well as the personal data of our employees, customers and suppliers.

Therefore, at Prosegur, 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

Prosegur 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 Prosegur and is considered reserved and confidential information.

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

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

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

a. Use confidential information exclusively for the performance of our professional activity at Prosegur and only provide it to other Prosegur 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 Prosegur, even after our professional relationship with Prosegur 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 Prosegur 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 Prosegur's information, our access codes to Prosegur'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 Prosegur. 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 Prosegur.

7.6.
Use and protection of resources

We use Prosegur'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 Prosegur. In the use of Prosegur'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 Prosegur.

7.7.
Social media use

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

Employees may not disclose information about Prosegur 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, Prosegur, other employees or third parties belonging to other Prosegur stakeholders.

We are prohibited from generating situations that may pose legal or reputational risks for Prosegur, 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

Prosegur 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 and that seeks to illegitimately influence the will of individuals to obtain a benefit or advantage of any kind.

In this regard, 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 Prosegur, 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 each country and/or locality and respond to legitimate interests.

Exempted from the above general prohibition are "permitted courtesies" with t he following characteristics:

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

Prosegur 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 Prosegur'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 Prosegur 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

Prosegur 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 Prosegur 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 Prosegur, 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 Prosegur.

Associations, collaborations, participations, contributions and support to candidates, political parties or campaigns and, in general, to entities, institutions or groups to which Prosegur 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 Prosegur. 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 Prosegur's commitment to transparency, any collaboration or sponsorship carried out by Prosegur, in addition to being duly recorded in Prosegur'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 Prosegur. 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 Prosegur'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 Prosegur.

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 Prosegur. 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 Prosegur 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 Prosegur 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 Prosegur in relation to courses, projects, computer programmes and systems, equipment, manuals, knowledge, processes and, in general, any work or project developed or created by Prosegur, 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 Prosegur 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.

07. Rules of conduct in our relations

7.14. Shareholders and investors

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 Prosegur, 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 Prosegur's policies, in accordance with 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.

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

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.

07. Rules of conduct in our relations

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 Prosegur 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 Prosegur'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 in the countries in which we operate.

7.18. Competitors

We compete actively in the markets where we have a presence 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 of the Board of Directors of Prosegur held on 28 October 2013, and is updated periodically, having been last updated on 29 October 2025.

The amendments made to the Code shall be approved by the Board of Directors, following a proposal by the Compliance Department to the Sustainability, Corporate Governance, Appointments and Remuneration Committee, and shall be applicable as of the day following their communication to all Subject Persons.

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