



**PROSEGUR**

**Human Rights  
Policy of  
Prosegur  
Compañía de  
Seguridad, S.A.**

## 1. Aim

Prosegur Compañía de Seguridad aims to make the world a safer place, requiring it to take an active posture on respect, protection and concern for implementing Human Rights.

Thus, based on the conviction that these are a tangible matter for the organisation, the Board of Directors of Prosegur Compañía de Seguridad has approved this Human Rights Policy (the “**Human Rights Policy**”), formalising the commitment by Prosegur Compañía de Seguridad and companies forming the Prosegur Compañía de Seguridad Group (the “**Group**” or “**Prosegur Compañía de Seguridad Group**”) with careful, on-going respect for Human Rights.

## 2. Scope of application and reach

The Human Rights Policy shall apply to Prosegur Compañía de Seguridad, S.A. (“**Prosegur Compañía de Seguridad**” or the “**Company**”) and to all the companies comprising its Group.

## 3. Development

### 3.1. Human Rights in Prosegur

Development of this Human Rights Policy provides continuity to the constant process of integrating Human Rights at Prosegur. To that end, the Human Rights Policy is included in the matrix of internal instruments through which Prosegur Compañía de Seguridad has implemented its responsibility in the matter in recent years.

- Code of Ethics and Conduct.
- Corporate Responsibility or Sustainability Policy.
- Occupational Health and Safety Policy.
- General 3P Rules on Discrimination and Harassment Complaints.
- Code of Ethics Policy.
- Human Resources 3P Decalogue.
- Safety 3P Decalogue and related rules.
- Data Protection and Information Security Policy.
- Procurement Policy.

The basis for preparation of the Human Rights Policy and related documents have been and are the United Nations Guiding Principles for Companies and Human Rights, as well as the following rules and standards that Prosegur Compañía de Seguridad specifically adheres to:

- International Bill of Human Rights;
- Ten Principles of the United Nations Global Compact;
- Charter of European Union Fundamental Rights;
- The fundamental conventions of the International Labour Organization (ILO);
- OECD Guidelines for Multinational Companies;
- International Convention on the Rights of the Child;
- Convention on the Rights of Persons with Disabilities
- International Convention on Elimination of All Forms of Racial Discrimination;

- Convention on Elimination of all Forms of Discrimination against Women;
- Principles for the Empowerment Women;
- Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment;
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families;
- International Finance Corporation's Equator Principles; United Nations Principles for Responsible Investment;
- United Nations Environment Programme Finance Initiative.

## **3.2. Principles**

Prosegur Compañía de Seguridad is committed to exercising clear, decisive leadership in Human Rights matters, complying with the applicable laws in each of the jurisdictions in which it operates and with the rights consecrated in the international instruments ratified in this Policy.

Within its commitment, Prosegur has established principles that, as minimum standard, shall spread throughout all the Company's processes and its relations with employees, providers, clients, consumers, end users and the social environments in which it participates, pursuant to the remaining internal regulations of the Company.

These principles provide special attention to the matters relevant to Human Rights impact arising from its activity.

### **3.2.1. Life and physical integrity**

In keeping with Article 4 of the Universal Declaration of Human Rights, Prosegur Compañía de Seguridad safeguards the life, liberty and personal safety both of the members of the company and persons who may be affected by the activities it performs.

Prosegur Compañía de Seguridad condemns torture and inhumane treatment. Nobody shall be subjected to torture or cruel, inhuman or degrading punishment or treatment sanctioned by the Company.

### **3.2.2. Forced labour and slavery**

Prosegur Compañía de Seguridad rejects resorting willingly to any form of forced labour or practice linked to modern slavery.

In its commitment not to become a victim to such practices, it shall apply surveillance, and if appropriate, eradication, in keeping with the terms set forth in Article 5 of the European Union Charter of Fundamental Rights and International Labour Organisation Convention 105 on forced labour.

### **3.2.3. Child labour**

Prosegur Compañía de Seguridad does not allow any type of child labour.

The group's procurement policies and supplier management processes stipulate unconditional respect for the minimum working age set out in Convention 138 of the International Labour Organization, and

in the regulations of the respective countries, if they are more stringent.

### **3.2.4. Right to health and safety**

One of the priorities Prosegur Compañía de Seguridad has is to ensure a safe, healthy working environment.

Prosegur has a global commitment, through its Occupational Health and Safety Policy - which applies to the entire organisation - to guarantee that the necessary resources are properly in place at the local level to ensure that the occupational health and risk prevention standards established in the national legislation of each country are met.

### **3.2.5. Non discrimination**

In line with the respect for Human Rights undertaken, Prosegur Compañía de Seguridad assures the absence of discrimination due to sex, race, religion, origin, marital status, social condition or any other personal distinction, granting special protection to any especially vulnerable group against such behaviour.

The Company promotes diversity among employees and ensures equal opportunities for job and career advancement.

The commitment acquired includes maintenance of a workplace environment free of harassment, abuse, threats or violence.

### **3.2.6. Labour conditions**

Human capital is a fundamental asset for Prosegur Compañía de Seguridad. Due to this, it is essential that relations with its employees are governed by the principles of justice, equity, dignity and respect.

The organisation exercises sectorial leadership focussed on strict compliance with the labour and social security laws in all jurisdictions, guaranteeing decent working conditions, including working hours, schedule and rest, contribution to the social provision systems, work-life balance and commitment to a safe, discrimination-free working environment.

### **3.2.7. Equitable, satisfactory remuneration**

The mission Prosegur Compañía de Seguridad has in the world is the result of the work by its employees and collaborators, who deserve fair compensation based on the principles of equity and meritocracy.

At Prosegur Compañía de Seguridad, all the remuneration systems always respond to compliance with the laws, and they are aligned with the market standards and living standards in each country. This is to ensure that the employees' income satisfy their needs and those of her families.

Likewise, all persons linked to Prosegur Compañía de Seguridad shall receive equal remuneration for the same work, rejecting any kind of discrimination.

This commitment covers providers and clients, who must share that philosophy and criteria in remuneration of their employees, according to the terms set forth in their internal regulations.

### **3.2.8. Work-life balance, rest and digital disconnection**

Prosegur Compañía de Seguridad undertakes that working and rest time, the right to digital disconnection and employee hours shall comply with the labour laws in force.

Thus, the Company recognises the right to rest, to enjoy free time, to reasonable limitation of the working day and to periodic paid holidays, pursuant to the terms set forth in Article 24 of the Universal Declaration of Human Rights.

Prosegur Compañía de Seguridad considers the family to be a fundamental axis of the family, and due to this it promotes the work-life balance as well as protection of maternity, paternity and childhood in keeping with Article 25.2 of the Universal Declaration of Human Rights.

### **3.2.9. Training**

Prosegur Compañía de Seguridad stands firmly behind its employees' talent and professional development. This is embodied in its commitment to provide varied, multiple platform, quality training, to provide the employees adequate preparation to perform their duties, to promote and achieve their professional development. Likewise, training is the main vehicle to transmit the values and principles of Prosegur Compañía de Seguridad in its environment.

### **3.2.10. Freedom of association and collective bargaining**

Prosegur Compañía de Seguridad recognises the fundamental right workers have to form, participate in or join trade unions or other representative bodies pursuant to the International Labour Organisation Freedom of Association and Protection of the Right to Organise Convention (No. 87).

Likewise, and pursuant to the labour laws in each country, the right to perform trade union activity, to collective bargaining, non-discrimination and protection of the workers' representatives is guaranteed.

### **3.2.11. Freedom of expression**

Prosegur Compañía de Seguridad has a firm commitment to abide by Article 11 of the European Charter of Fundamental Rights in matters of freedom of expression for its employees, respecting freedom of opinions and assuring the confidentiality and privacy of communications, either exterior or in use of internal mechanisms such as the Ethics Channel, designed specifically to ensure fulfilment of this principle.

Prosegur Compañía de Seguridad establishes special protection for defenders of Human Rights, in line with what is established by the 2000 mandate of the Commission for Human Rights, in relation to the rights and duty of individuals, groups and institutions to promote and protect Human Rights and fundamental liberties.

### **3.2.12. Right of privacy**

Prosegur Compañía de Seguridad guarantees the right to privacy and intimacy, both of its employees as well as third parties. This involves providing special attention to correct use of personal data and the information recorded within the organisation.

Thus, the global commitment Prosegur Compañía de Seguridad has to protect the workers' privacy from other people's action and knowledge is recorded in its Data Protection and Information Security Policy.

### **3.2.13. Commitments to society**

Prosegur Compañía de Seguridad maintains the strong commitment to contribute to improvement, to the greatest extent possible, of social rights in all the areas where it works, and to create a more equal society. In that line, it recognises the rights of local communities to wellbeing and the environment as a human right in itself, which must be respected within the framework of activities by Prosegur Compañía de Seguridad.

The Prosegur Foundation thus channels its social action projects in education, support for culture, social and labour integration of people with special needs, and encouraging corporate volunteering. The organisation also proves its commitment in environmental matters, as well as to combat corruption, extortion and bribery, whatever the ways in which these appear.

## **3.3. Management Model: Continual improvement cycle**

With the firm intention to ensure strict fulfilment of this Policy, Prosegur Compañía de Seguridad has systemised management of due diligence on Human Rights matters, based on the continual improvement cycle.

This operating focus, consisting of four stages, exemplifies the organisation's aim for the actions, objectives and processes in this matter to undergo constant review and improvement, and seek to guarantee the internal processes of Prosegur Compañía de Seguridad that allow effective identification, prevention, mitigation and repair of possible negative impacts in Human Rights.

### **3.3.1. Planning**

The fundamental pillar of this methodology is evaluation and identification of our impact on Human Rights. This was materialised in this financial year, initially in 2018, with the Due Diligence process which transversally analysed the different lines of business and countries in the organisation, to identify possible risk factors in respect for Human Rights.

The Risk Map arising from on-going Due Diligence exercises in Human Rights is the basis for planning the measures aimed at correcting any aspect of our internal or operating processes that might amount to a risk to Human Rights.

This evaluation and planning process must be continual, as risks to Human Rights may change in time, according to the evolution of the operations and the operating context of the organisation, so its periodic repetition is established.

Dialogues shall also be established with focus groups, in order to bring them into the design and implementation process of the measures planned.

### 3.3.2. Rollout

Implementation of the measures provided in Human Rights planning involves all levels of the organisation: corporate managements, local teams in each of the countries, and each of the employees in Prosegur Compañía de Seguridad, whatever their role.

Thus, along with supervision and strict monitoring of execution of the preventive and corrective measures provided at each level, there are two fundamental tools for adequate integration of due diligence by Prosegur Compañía de Seguridad in Human Rights matters: communication and training.

Likewise, Prosegur undertakes to distribute this Policy in particular and respect for Human Rights in general, both internally as well as publicly.

### 3.3.3. Evaluation, control and periodic review procedure

Checking the efficiency of applied measures and policies is essential to check the state of enjoyment of Human Rights.

Prosegur Compañía de Seguridad undertakes to make the necessary tools available to control compliance with this Human Rights policy, including:

- Quantitative measurement through the relevant indicators.
- Qualitative analysis through mechanisms such as random employee satisfaction surveys, detailed study of possible reports received through the ethics channel (which is available, among other matters, to facilitate whistleblowing by employees and external parties regarding possible Human Rights infringements).

All this is supervised through the internal auditing and compliance committees. Infringements detected in relation to respect for human rights shall be analysed according to the internal processes, legal regulations and the conventions in force, being able to implement disciplinary measures.

This policy shall come into force from the date of its publication. Its content shall be subject to periodic review, performing the changes or modifications that are considered convenient.

### 3.3.4. Remediation

Prosegur Compañía de Seguridad recognises its responsibility to act proactively and correctively in any situation that involves breach of human rights. Prosegur Compañía de Seguridad undertakes to provide equitable and transparent solutions that concentrate on the victims of such situations.

The action involves correction by double means:

- Remediation of breaches of Human Rights which are detected.

Prosegur Compañía de Seguridad has and publicises its internal conflict resolution mechanism in cases when possible breach of Human Rights are reported. The resolution process guarantees the principles of confidentiality, independence and equality among parties.

- Any effective breach of Human Rights that may be detected shall be duly investigated and

made known to the competent public authorities.

- If a breach of human rights is confirmed, Prosegur Compañía de Seguridad shall immediately implement adequate corrective actions to remedy the damage caused. Such actions shall include:
  - (i) Fair, adequate compensation for the persons affected, pursuant to the applicable regulations.
  - (ii) Review and modification of the processes, policies or practices that have given rise to infringement of rights.
  - (iii) The establishment of guarantees in order for similar situations not to be repeated in the future.

The continual improvement cycle involves a constant search to perfect processes, so it is important to classify the lessons learned and take them on board, and return the planning stage to implement the necessary adjustments to guarantee due diligence by Prosegur in Human Rights matters.

### **3.4. Availability to parties concerned**

This policy shall be published on the Company's web page and intranet.

The content of this policy may also be included in training materials for its own personnel and in additional diffusion actions, as determined from time to time. All necessary measures shall also be applied to correct any such situation and to establish adoption of corrective / preventive measures to prevent further irregularities from being committed.

- Correction of the processes or parts thereof that have been proven to be deficient or improvable to protect Human Rights.

## **4. Approval and distribution**

This Human Rights Policy was initially approved by the Company Board of Directors on 28th October 2021 and was last amended on 30th October 2024.

This Human Rights Policy shall be published on the corporate web page and the company intranet.

The content of this Policy may be included in the training materials for its own personnel and in additional diffusion actions, as determined from time to time. Training actions shall be carried out in order to spread respect for Human Rights in the corporate values, to ensure understanding of the Policy and for it to be present in each one of the individual and collective actions by the organisation.



## 5. Preparation

Owner:	Human Resources Management		
Reviewed by:	Human Resources Management	Corporate Legal Management	
Approved by:	Board of Directors of Prosegur Compañía de Seguridad, S.A.	Date:	30th October 2024