



**PROSEGUR**

General Policy on  
RESPONSIBLE  
**ARTIFICIAL  
INTELLIGENCE**

**Prosegur Compañía de Seguridad,  
S.A**

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# 1. Purpose

**Artificial Intelligence** (hereinafter, "AI") has recently acquired greater relevance in all areas of our lives, and there are many uses in which we find it, both in the personal and professional spheres. However, although the use of AI-based technologies can bring significant benefits to users, in turn, the application of AI to the different areas of our lives **requires the implementation of specific controls, policies and work methodologies** that allow us to analyze and prevent the potential risks and/or harmful consequences that the use of AI technologies could generate for those affected, in relation to their rights and freedoms.

**Prosegur is firmly committed to respecting the rights and freedoms of the people** involved in the development of its activity, as well as the importance of its solutions being respectful of ethical and moral values, and ensuring compliance with them, as well as compliance with applicable regulations.

In order to fulfil these purposes, **Prosegur has drawn up this Responsible Artificial Intelligence Policy**, which aims to lay the foundations for the methodology to be applied in all projects that incorporate AI technology, either as a result of projects developed internally or as a result of the acquisition and implementation of external products or solutions.

Prosegur, through this policy, guarantees compliance with its three fundamental axes:



- **Lawfulness:** AI must be **lawful** to ensure compliance with all applicable laws and regulations.
- **Ethics:** AI must also be **ethical**, i.e., it must ensure compliance with ethical principles and values; and, finally,
- **Robustness:** AI must be **robust**, both technically and socially, since AI systems, even if they are made up of good intentions, can cause accidental damage.

# 2. Scope

This Responsible Artificial Intelligence Policy is applicable to all entities and workers that make up the Prosegur Group (hereinafter, "Prosegur") in all the countries where Prosegur operates, and binds all personnel, internal or external, who may be involved in the participation of AI-related projects.

However, this policy is especially applicable to project managers who are aware of the existence of an Artificial Intelligence project initiative, developers of solutions that incorporate AI technology, as well as to area or business managers or managers, who have assigned responsibilities in this area, -members of the AI Committee- in order to ensure that the technological solutions are well developed by Prosegur, or acquired from third parties comply with the requirements of this policy.

## 3. Development

### 3.1. Regulatory Framework

The regulatory framework that has been taken as a reference for the development of this Responsible Artificial Intelligence policy has been the European legislation on Artificial Intelligence, specifically, the **Artificial Intelligence Regulation (Regulation 2024/1689) of 13 June 2024**, with effective application from 2 February 2025.

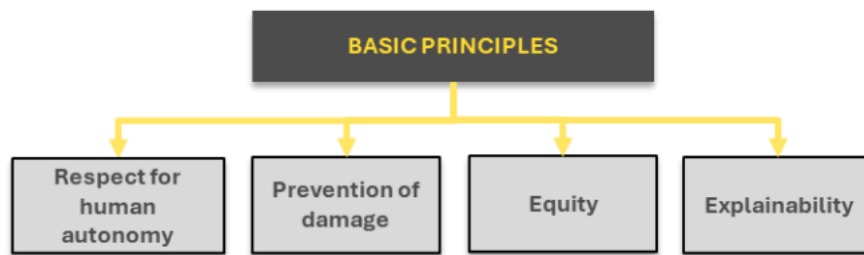
This Regulation establishes a comprehensive regulatory framework based on the risk inherent in the use of AI algorithms, and aims to promote their use, development, and implementation in a responsible manner, with a special focus on the protection of fundamental rights, privacy and security of individuals.

In this regard, it differentiates different types of use of AI algorithms, and establishes 4 levels of risk classification, ranging from those ranging from AI systems that incorporate prohibited processing activities, high risk, limited risk and minimal risk, establishing a whole series of requirements and obligations to minimize risk in the event of their implementation, avoiding possible threats to the rights and freedoms of potentially affected users.

### 3.2. Principles of Responsible Artificial Intelligence

For the preparation of this policy, Prosegur has taken as a reference the ethical principles set out in the AI Regulation as well as in the "Guide on Ethical Guidelines for Trustworthy AI" issued by the European Commission, including them as inspiring principles, whose observance must be present in all projects that incorporate AI technology. allowing individual and collective well-being to be improved, whether they are own developments, have been acquired from third parties, or have a mixed nature (e.g. those cases in which an algorithm is acquired from a third party, which is developed by Prosegur, for its application to a specific use case.

The four principles that must be present in all projects for the development, acquisition, or implementation of AI solutions by Prosegur are:



### 3.2.1. Respect for human autonomy

Prosegur will guarantee respect for the freedom and autonomy of human beings, in all initiatives or projects that incorporate AI technology, whether they are internal developments and/or acquisition of AI solutions, or of a mixed nature. The AI Systems that are developed will be designed with the aim of increasing, complementing and enhancing people's cognitive and social skills, so human supervision and control over the work processes executed by AI systems must be guaranteed.

### 3.2.2. Principle of prevention of harm

Prosegur will guarantee that AI systems will not cause harm or harm human beings in any other way, protecting human dignity, as well as physical and mental integrity. Prosegur will guarantee that all AI systems and environments are safe and robust from a technical point of view and, in no case, will they be used for malicious uses. Prosegur will also pay special attention to the possible adverse effects that an AI system could cause, establishing specific measures for their mitigation.

### 3.2.3. Principle of equity

Prosegur will ensure that the development, deployment and use of AI systems is equitable, committing to ensuring a fair and equal distribution of benefits and costs, and ensuring that individuals and groups do not suffer unfair bias, discrimination or stigmatization.

Prosegur will try to prevent unfair biases from occurring and may establish specific measures in order to increase social equity through the use of AI systems. Likewise, the use of AI systems by Prosegur will respect the principle of equity, understood as the ability to offer the possibility of opposing the decisions adopted by AI systems, as well as to transfer their opposition to the people who manage them, there must be a balance of proportionality between means and ends pursued. So, it will carefully analyze how to achieve that balance between interests and objectives that may be opposed.

### 3.2.4. Principle of explainability

Prosegur is aware that explainability is crucial to ensure that users trust AI Systems, for this, all processes that involve AI development must be transparent with users, communicating concisely the capabilities and purposes of the same to the parties involved.

## 3.3. Initiative Evaluation Methodology

Prosegur has designed an *ad hoc* methodology for the evaluation of all initiatives or projects that incorporate AI technology, whether they are its own developments, third-party or of a mixed nature, in order to achieve the purpose pursued through this policy, i.e. that throughout

the life cycle of this type of initiative, respect at all times compliance with the ethical values established therein, as well as compliance with the European regulations established in this area.

The methodology developed by Prosegur allows (i) the **registration** of all project initiatives that incorporate AI technology, (ii) the **classification of the level of risk** associated with such initiatives, (iii) the **evaluation of AI initiatives** and (iv) **validation** in accordance with the provisions of European legislation, as well as this standard.

The phases of the AI initiative evaluation process defined by Prosegur are as follows:

**3.3.1. Registration:** The identification of any AI initiative in Prosegur must be registered in P&CMS, and general information about the initiative must be provided.

**3.3.2. Risk classification:** the determination of the risk level of the AI initiative will be required, in accordance with the provisions of European legislation and the Group's Responsible AI Policy.

- Prohibited AI Systems
- High Risk Systems
- Limited Risk Systems
- Minimal Risk Systems

**3.3.3. Evaluation:** The AI Initiatives Evaluation process defined by Prosegur requires compliance with **8 Key Requirements**:

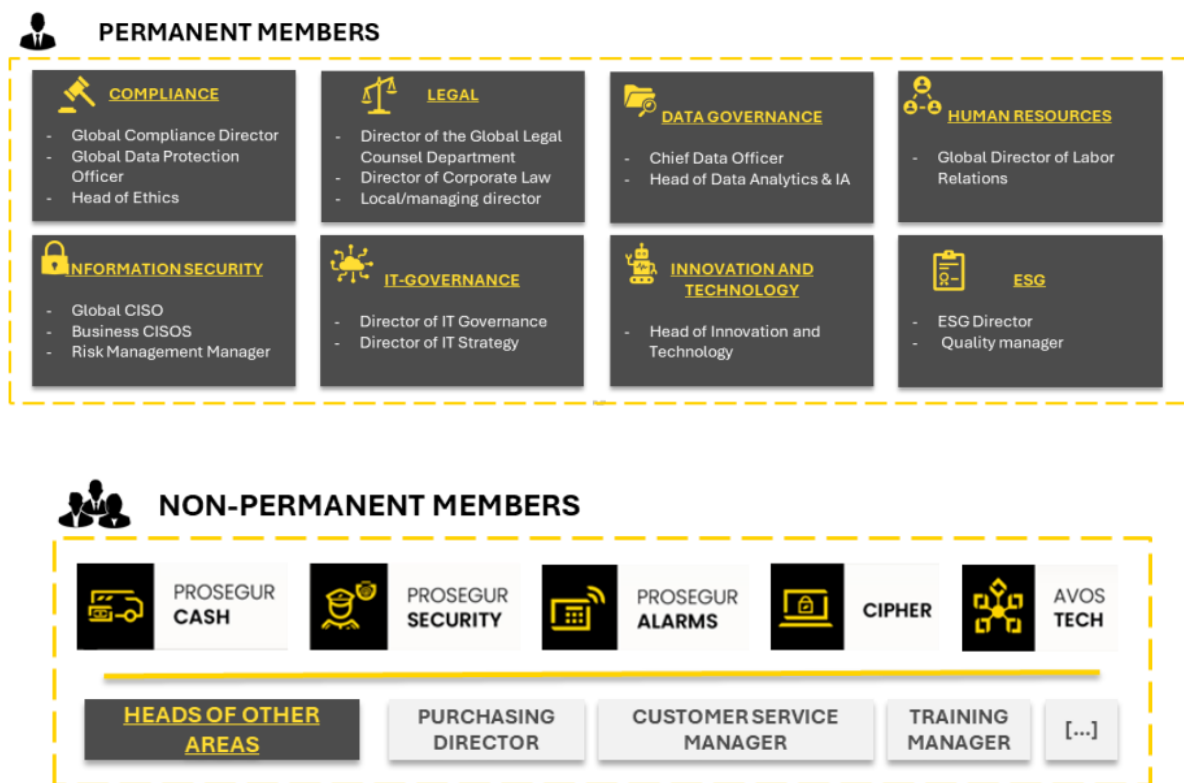
- 1. Privacy:** Prosegur will assess whether the AI solution respects users' privacy and will ensure that a Privacy Impact Assessment is conducted, if applicable.
- 2. Technical Soundness and Safety:** Prosegur will evaluate the technical and safety aspects associated with the AI initiative, ensuring that the security measures applied comply with the required safety standards.
- 3. Transparency:** Prosegur will assess whether the AI initiative offers transparent and clear information for users, guaranteeing its understanding and traceability.
- 4. Human Oversight and Fundamental Rights:** Prosegur will assess whether the AI initiative respects users' fundamental rights and will ensure that a Fundamental Rights Impact Assessment (FRAIA) is conducted, if appropriate.
- 5. Diversity, non-discrimination, and equity:** Prosegur will assess whether the proposed AI solution guarantees inclusion, diversity and equal treatment between people throughout their life cycle.
- 6. Social and environmental well-being:** Prosegur will assess whether the AI solution integrates the values of social welfare, energy efficiency and sustainable development.
- 7. Responsibility:** Prosegur will assess whether the AI solution has the appropriate controls and mechanisms in place to ensure responsibility and accountability.
- 8. Proper data governance:** Prosegur will evaluate whether the AI solution complies with the principles of data minimization, quality and accuracy.

**3.3.4. Validation:** Once the 8 key requirements of the evaluation process have been evaluated, the assigned reviewers will send it to the area managers for validation, who may consider the evaluation process completed, or if inconsistencies or deficiencies have been identified in said process, return the evaluation to the reviewer of the initiative. for the purposes of rectification.

### 3.4. Governance Model

In order to comply with the requirements in the field of Artificial Intelligence and guarantee the defense of the rights and interests of those interested in the development of its activity, **Prosegur has a governance model in the field of AI**, with its highest collegiate body, the Responsible Artificial Intelligence Committee, which is made up of permanent and non-permanent members.

Below is a graphic representation of Prosegur's Artificial Intelligence Committee:



The **Responsible Artificial Intelligence Committee** is a collegiate body made up of the main heads of the areas involved and referred to in the previous section, whose main functions are:

- Ensure that initiatives, solutions, or projects that incorporate AI technology, whether developed internally or acquired, comply with the principles and obligations set forth in this policy.

- Supervise the development of all Prosegur's AI solutions, and monitor their complete life cycle, in order to ensure (i) strict compliance with the applicable regulations and the requirements established for this purpose by Prosegur's corporate areas, (ii) respect for ethical and moral values by these solutions, as well as (iii) the robustness of AI solutions from both a technical and social point of view.
- Keep track of all AI initiatives conducted at Prosegur.
- Advise the different areas/businesses on all legal and ethical issues affecting AI projects.
- Ensure that the eight key requirements set out in [point 3.3.3](#) of this policy are met.
- Communicate information to the areas involved, in a clear and proactive way, about the capabilities and limitations of AI systems, enabling realistic expectations to be set, as well as how requirements are met. Be transparent about the fact that you are working with an AI system.
- Facilitate the traceability and auditability of AI systems, especially in critical contexts or situations.
- Involve the relevant areas throughout the lifecycle of AI systems.
- Promote training and education, so that all the areas involved are knowledgeable about Responsible AI and receive training in the field.

## 4. Approval, dissemination and knowledge of this Policy

This Policy will be subject to appropriate dissemination, communication, training and awareness-raising actions for its proper understanding and compliance by the entities that make up the Prosegur Group.

The full text of this Policy is sent to all employees of the Prosegur Group, regardless of the activity carried out by them and, in general, to all those persons to whom it is applicable in accordance with the provisions of this Policy, all of whom will be obliged to strictly comply with the content of the same. as well as suppliers, collaborators who participate in the development of AI solutions, and all stakeholders with whom Prosegur maintains commercial relations.

## 5. Preparation and approval

Prepared by:	Director of Regulatory Compliance
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Reviewed by:	Corporate Legal Area Management Corporate Internal Audit Directorate		
Approved by:	Board of Directors of Prosegur Compañía de Seguridad, S.A	Date:	30/04/2025