



**PROSEGUR**

# **Anti-Corruption Policy**

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

COMPLIANCE AREA

## 1. Owner

Corporate Director of Internal Audit and Compliance

## 2. Scope

This Policy is applicable to all companies directly or indirectly controlled by Prosegur, except for "Prosegur Cash, S.A.", and companies directly or indirectly controlled by said company, which have their own policy.

Specifically, this Policy 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 "**Subject Persons**").

As an exception to the provisions of the preceding paragraph, the provisions of section III of this Policy, on conflicts of interest, shall not apply to the members of Prosegur's Board of Directors, who will be subject to the conflicts of interest regime provided for in the law, in the Regulations of the Board and in other internal Company regulations that govern the conflicts of interest of directors.

The Policy 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.

With this Policy, Prosegur consolidates its commitment to principle number 10 of the United Nations Global Compact, to which the Company adhered in 2002, which requires its signees not only to prevent bribery, extortion and other forms of corruption, but also to develop concrete policies and programmes to promote transparency.

## 3. Object

This Anti-Corruption Policy (the "**Policy**") has been approved by the Board of Directors of Prosegur Compañía de Seguridad, S.A. ("**Prosegur**" or "**Company**") with the aim of establishing and specifying the guidelines and patterns of behaviour that the Company and all its professionals must know and comply with as regards anti-corruption.

This Policy confirms Prosegur's firm commitment to ethics, professionalism and respect for the law.

These values, together with all other principles and values contained in the Company's Code of Ethics and Conduct (the "**Code of Ethics**"), must guide the development of all its activities and form the key pillars that support its culture of compliance.

Based on these values, Prosegur builds its common corporate strategy, in full and absolute compliance with current national and international regulations.

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## 4. Draft and approval

Drafted by:	*Corporate Director of Internal Audit and Compliance – Miguel Soler Ruiz-Boada			
Revised by:	Global Legal Area	Javier Aparicio Alfaro		
	Process Transformation Office			
Approved by:	Board of Directors of Prosegur Compañía de Seguridad, S.A.	Date:	27/10/2022	
Replacing:		Edition:		Date:

## 5. Implementation

### I. Applicable regulations.

Prosegur complies with the applicable legislation of all the countries in which the Company has a presence and, in particular, with the laws that, in each jurisdiction, are intended to fight corruption.

Prosegur also complies with its internal corporate regulations in all the countries in which the Company has a presence, including, in particular, its *Code of Ethics*, which expressly states its total rejection of 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."*

*"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."*

Prosegur's activities in certain countries may require the application of specific internal anti-corruption regulations and additional compliance programmes that, following from and in accordance with this Policy, ensure compliance with the legislation and the particular local circumstances.

### II. Commitments, guidelines and behaviour guidelines.

Subject Persons are required to comply with the following commitments, guidelines and behaviour guidelines:

#### Sección 1.01 Corruption.

- ❖ Maintain due diligence in the workplace and perform their professional duties with ethics, transparency and honesty.
- ❖ Pay special attention to cases in which there are signs of a lack of integrity of the persons or entities with which business is conducted.

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- ❖ Respect the commitment not to carry out economic transactions, contracts, conventions or agreements when there are well-founded and sufficient reasons to believe that there may be some type of link with improper or corrupt activities by some of the counterparties involved.

### Sección 1.02 Bribery.

- ❖ Refrain from making offers, promises, authorisations or deliveries, direct or indirect, of any kind of monetary incentive, commission, gift or compensation to any employee, director or administrator of other companies or private entities, as well as to authorities, public officials, employees or directors of companies and public bodies, with the purpose that, in breach of their responsibilities and, where appropriate, current legislation, they act or fail to act to favour a certain business or obtain an undue business advantage. These deliveries, promises, authorisations or offers are prohibited whether they are made directly or indirectly through collaborators, partners, associates, agents, intermediaries or any other third party.
- ❖ Refrain from accepting, directly or indirectly, any type of gift whose purpose is that the Subject Person, in breach of their obligations, favours, directly or indirectly, the giving person or entity in contracts for goods or services.

### Sección 1.03 Money laundering.

- ❖ Donations, whether Prosegur is a donor, a donee or a recipient, may not serve as a means of introducing money from an illicit activity into the financial system.
- ❖ Prosegur is prohibited from carrying out any act aimed at giving the appearance of legality to resources (financial or material) originating from or related to the commission of crimes.

### Sección 1.04 Fraud.

- ❖ Subject Persons have the commitment and the obligation not to incur in actions that could constitute some type of fraud against the Company.
- ❖ Subject Persons have the obligation to report any fact that could be a sign of the commission of a fraud.

### Sección 1.05 Influence peddling.

- ❖ Subject Persons shall not carry out any type of activity that may constitute influence peddling.

### Sección 1.06 Extortion.

- ❖ Subject Persons shall refrain from engaging in conduct that could constitute or be related to extortion in all its possible manifestations.

**Sección 1.07 Use of false information.**

- ❖ Subject Persons shall not make use of false information before any type of authority (administrative or judicial) or before any third party in order to obtain any benefit or undue advantage.

**Sección 1.08 Facilitating payments.**

- ❖ Subject Persons shall in no case make payments to facilitate or expedite procedures consisting of offering, promising, authorising or delivering, directly or indirectly, monetary incentives, commissions, remuneration or things of value to officials and public servants or to employees and directors of private entities in order to expedite judicial or administrative procedures, procedures or of any other nature.

**Sección 1.09 Policy on Gifts and Hospitality**

- ❖ The general principle of prohibition of receiving, promising, accepting and offering, within the framework of 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 customers, civil servants, public officials or any other person with whom we have professional relations, applies.
- ❖ In any case, Prosegur is prohibited from giving gifts, hospitality, promotions, invitations or presents to customers, civil servants, public officials and, in general, to any person with whom it has 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 all of the 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.
- ❖ Subject Persons 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.

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- ❖ Before any Subject Person offers or accepts a gift or present, they must request the corresponding authorisation from their superior, who will assess whether the offer or acceptance of the gift or present is compatible with the provisions of this Policy and, in the event of doubt, will refer the matter to the Compliance Officer.

### **Sección 1.10 Improper use of public resources.**

- ❖ When, for whatever reason, Prosegur receives public resources, it must use them only for the purpose for which said public resources have been provided.
- ❖ Prosegur undertakes to keep the corresponding records in a clear, precise, consistent and transparent manner in order to verify the use and end given to the public resources it receives.

### **Sección 1.11 Political contributions.**

- ❖ Prosegur shall not make contributions or donations to candidates, parties or political campaigns. The granting by Prosegur of any aid or contribution, monetary, direct, indirect or otherwise, to political parties, their representatives or candidates is prohibited.

## **III. Conflicts of interest**

Prosegur understands and knows that conflicts of interest may become unavoidable when Subject Persons perform their activities. However, it considers that these can be controlled in order to mitigate their consequences. Consequently, it is of the utmost importance that, given the possible existence of such conflicts, they are declared and managed appropriately.

Prosegur shall keep a record of the declarations of conflicts of interest made by Subject Persons and of the supporting documentation for their correct management.

Subject Persons:

- Undertake not to participate in any business or activity that, directly or indirectly, interferes with the interests of the Company.
- Undertake not to leverage their jobs or influence derived from their positions to obtain personal benefits or benefits for third parties.
- Shall not use the assets (facilities, work instruments, etc.) for business or personal activities.
- Shall refrain from influencing in any way the negotiations and decision-making processes with customers with whom they have a family relationship or any other direct or indirect interest.

In case of conflict of interest, Subject Persons:

- Must immediately declare any conflict of interest that may arise to their superior, the Compliance Area or, as the case may be, to Human Resources.
- When there is a conflict of interest related to the purchase of products or services from a third party with which Prosegur has a commercial relationship, this must be reported to the head of the Purchasing area or the Compliance area.

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- Must refrain from participating in any recruitment decision-making process of people with whom they have a close bond (family, friendship, work, etc.).
- Must refrain from soliciting or receiving fees, commissions, services or other favours from any business associate, actual or potential, or the competition.

If they have any doubts, queries or complaints, Subject Persons must immediately contact:

- ❖ Their immediate hierarchical superior.
- ❖ The Human Resources Department.
- ❖ The Compliance Officer.
- ❖ The Whistleblower Channel.

#### **IV. Due diligence in the relationship with third parties.**

Subject Persons must choose the third parties (agents, consultants, partners, suppliers or representatives) with whom the Company enters or plans to enter into commercial relationships with due diligence, in accordance with the applicable regulations established in relation to the knowledge, identification and engaging of third parties.

#### **V. Tenders.**

All public or private tenders in which Prosegur participates must be carried out in compliance with their official terms and conditions and in accordance with the applicable laws and regulations.

In bidding processes in which the Company participates, Subject Persons must comply with the following principles of action:

- Subject Persons may not offer, directly or indirectly, any object of value to a public official to inappropriately influence any aspect related to the entire public procurement process in favour of Prosegur.
- Prosegur will never accept or request information related to the tender that is not of a public nature.
- Prosegur will not conspire, participate in cartels, or improperly coordinate with other bidders.
- Subject Persons undertake not to enter into, in public procurement procedures, agreements, contracts, conventions, or any other type of similar collusive behaviour with one or more participants, the purpose or effect of which is to obtain an undue benefit in favour of Prosegur.

#### **VI. Recruitment of former public officials.**

Prosegur may only proceed with the recruitment of former public officials, including foreigner public officials, once the periods of time established in the applicable regulations in each jurisdiction have elapsed from the date on which they have left their positions.

Any additional limitations under applicable legislation shall be observed and complied with.

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## VII. Reporting of breaches, and sanction.

All Subject Persons have a duty to know, comply with and disseminate this Policy, as well as the obligation to report through the established channel any situations or actions of which they are aware and that violate or may violate the anti-corruption regulations.

This reporting must be immediate and must occur through one of the channels established in the Code of Ethics.

Prosegur's Whistleblower Channel is available all times on <https://www.Prosegur.com/canal-etico>. This is a channel that preserves the confidentiality required for each situation, the anonymity necessary to guarantee respect for the privacy of its users, and the absence of reprisals against anyone who reports improper conduct or participates in its investigation, unless they act in bad faith.

Subject Persons who fail to comply with this Policy shall be subject to the disciplinary measures determined by the Human Resources Area in accordance with their employment contracts, the applicable labour legislation and the Company's internal regulations. They may also be prosecuted, as the case may be, in the corresponding jurisdictions.

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, and its consequences. It may entrust the investigation to a third party outside Prosegur, as a guarantee of independence, when deemed appropriate.

Prosegur shall promote the termination of any commercial relationship with customers, suppliers and other third parties who fail to comply with the provisions of this Policy and will assess the advisability of demanding the repair of the damage that, if any, it may suffer, acting in all cases with respect and in compliance of the terms of the contracts entered into.

## VIII. Approval and effectiveness.

This Policy has been approved by Prosegur's Board of Directors on 27 October 2022 and will come into force the day after its approval.

## 6. Documents associated with the process

Code	Name
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