



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

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1. Purpose

The purpose of the Prosegur Compañía de Seguridad, S.A. Purchasing Policy (the "**Company**" or "**Prosegur**") (the "**Purchasing Policy**") is to help improve the productivity of Prosegur Group companies by optimizing and standardizing procurement processes, seeking to maximize the value and minimize the cost, risks, and impacts involved in the procurement of goods and services.

To this end, this policy establishes the principles that apply to the procurement of goods and/or services from Prosegur Group companies with the aim of ensuring a standard sustainable procurement policy, appropriate expense management and the establishment of solid relationships with suppliers to guarantee business continuity.

2. Application and scope (2024 version)

This Purchasing Policy is applicable to the Company and the companies in its group over which Prosegur has control (the "**Group**" or "**Prosegur Group**").

3. Principles

- This Purchasing Policy is based on the following principles:
 - Transparency in the purchasing process and decision-making.
 - Reduction and, if possible, elimination of third-party risk.
 - Segregation of duties between the applicant/manager and the buyer.
 - Competition among suppliers.
 - Objectivity in evaluation processes and award criteria.
 - Respect and promotion of ethical and environmental guidelines and compliance with sustainability regulations.
 - Rigor in compliance with the internal and external regulations applicable in each process.

4. Details

- The requesting areas are responsible for defining and establishing the technical, commercial, and business requirements of their purchasing requests. The Purchasing area provides guidance on sustainability and other areas.
- The requesting areas will pay special attention to defining the requirements from a sustainability

perspective (such as generation and management of waste, CO2 emissions and the social impact of the procurement, as well as compliance with applicable regulations).

- The requesting areas will avoid including requirements that limit the possibility of competition in order to facilitate the execution of transparent and competitive bidding processes.
- Except for express authorization and cases permitted under internal regulations, all purchases and contracts with suppliers of goods and services (including framework purchasing agreements) must be led through the Purchasing area to which the corresponding category has been assigned, supported by the necessary technical and business areas, including Legal, Information Security and Data Protection.
- The hiring of suppliers sanctioned for fraud or corruption and, in general, anyone who may present a risk to the supply of goods and/or provision of services will be avoided.
- In those purchasing categories where applicable and/or as required by applicable regulations, the criteria for evaluating suppliers' offers will include sustainability, environmental impact and human rights criteria, as well as compliance with applicable regulations.

5. Supply chain and responsible practices

- Prosegur promotes the engagement of suppliers that meet sustainability criteria (particularly respect for human rights) and that promote and support the United Nations Sustainable Development Goals and have some form of ESG (environmental, social and governance) certification, either through membership of sustainability indexes or sustainability certification.
- Prosegur promotes and encourages the suppliers with which it operates to accept the following principles:
 - Respect the applicable laws of all jurisdictions in which the Prosegur Group operates.
 - Apply Prosegur's Human Rights policies, whose principles include:
 - Respect for the life and physical integrity of its workers and the workers of its suppliers.
 - The rejection of forced labor and slavery in its suppliers.
 - Rejection and non-acceptance of child labor in its suppliers.
 - The right to health and safety of its suppliers' workers, offering a safe working environment that meets all occupational health and safety standards.
 - Equal opportunities.
 - Non-discrimination based on sex, race, religion, origin, marital status, social condition or any other personal distinction.
 - Respect for the rights of ethnic minorities and indigenous peoples where they operate, fostering open dialogue that favors the integration of diverse cultural frameworks
 - The care and continuous improvement of the working conditions of its suppliers' workers, highlighting the following actions for workers within its supply chain:
 - Fair and satisfactory remuneration.
 - Foster work-life balance, rest and digital disconnection.
 - Promote the right to privacy, freedom of expression, freedom of association and collective bargaining.

- Promote the training and development of workers.
- Apply sustainability policies, implementing sustainable practices that respect the environment, and requiring suppliers to be committed, where appropriate, to the use of renewable energy, actions to reduce emissions and pollutants and to prevent climate change, respect for biodiversity, sustainable use of natural resources and reducing waste, that contribute to, or at least do not hinder, the Company achieving its sustainability objectives.
- To the extent appropriate, depending on the type of supplier, measure their CO2 emissions and other polluting parameters that may affect their activity, have sustainability plans that set targets for reducing impact and improving their processes to reduce their carbon footprint, and carry out their procurement processes for goods and services with special consideration for their environmental impact.
- Prosegur will seek to ensure its suppliers comply with the Suppliers section of Prosegur's Code of Ethics and Conduct and other requirements it establishes in relation to human rights, labor, the environment, data protection and artificial intelligence, evaluating the risks in their supply chains, the geographical presence of suppliers, and the existence of sustainability policies and measures, applying a risk-based approach (i.e., prioritizing based on the severity and probability of the risk).
- Prosegur will ensure that due diligence activities, audits and checks deemed necessary can be carried out and will ensure that measures are promoted to reduce the impact or adverse effects on the environment and human rights caused by suppliers, considering a risk-based approach (i.e. prioritising based on its severity and probability).
- In general, Prosegur will seek to ensure compliance with applicable regulations, particularly with regard to the payment of supplier invoices in accordance with the law, notwithstanding its efforts to avoid undue delays in the payment of invoices approved and agreed with suppliers. The Purchasing Department will ensure its teams are adequately trained in this.
- In cases where a potential conflict of interest or potential fraud is detected between a Prosegur employee and a supplier, the corresponding area director and/or the Prosegur Corporate Chief Procurement Officer and/or the Financial Director and/or the regulatory compliance office must be informed immediately. Whenever possible and proportionate, the contract with the supplier will be suspended until the relevant investigation is completed and the findings are issued.

6. Approval and dissemination

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

This Purchasing Policy will be published on the Company's corporate website and intranet.

The contents of this Policy may be included in staff training and other actions to raise awareness of them. Those responsible for the Business and Support areas will adopt the necessary measures for the dissemination, training and compliance with this Policy.

7. Preparation

Owner:	Prosegur Corporate Purchasing Department		
Reviewed by:	Corporate Legal Area		
Approved by:	The Board of Directors of Prosegur Compañía de Seguridad, S.A.	Date:	October 30, 2024