

Human Rights Due Diligence Analysis Results Report





1. Objective and Scope.



## 1. Objective and Scope

### Objective

Every three years, the Prosegur Group (hereinafter "Prosegur") uses third parties to collaborate in the review of due diligence management. As part of the initiatives associated with respect for Human Rights, **Prosegur has systematized due diligence management** based on the continuous improvement cycle.

PwC has participated together with Prosegur in the preparation of this advisory report on the **analysis of Human Rights due diligence maturity against practices and standards**, working under the direction of Prosegur.

Through this exercise, the following has been achieved:

- **Update the inherent risk maps**, identifying the probability of human rights violations associated with Prosegur's activity, according to type (labor, civil, security, etc.) and public environment based on the key countries identified.
- Determine the level of maturity of the mechanisms, procedures and controls currently in place globally and locally for each of the inherent risks identified for each of the countries of application and business lines.
- Review the **status of the recommendations** of the 2021 HR due diligence process and see the **evolution** in the matter.
- Obtain **recommendations**, **measures to be implemented and opportunities** to promote cross-cutting and country-specific measures.

## Scope:

#### Countries and business





- Alarms
- Cash
- Security





- Cash
- Cybersecurity
- Security





- Alarms
- Cash
- Cybersecurity
- Security





- Alarms
- AVOS Tech
- Cash
- Cybersecurity
- Security



- Alarn
- Security



2. Conclusions.



# 2. Executive summary

### **WORK DONE**

For this exercise, covering 5 countries and 5 business lines\*, 64 interviews were conducted with 91 professionals (main responsible parties per country, business and at a corporate level) and more than 100 supporting documents (main policies, training plans, etc.) were analyzed.

### **OBTAINED RESULTS**

- Updated Risk Map, identifying the probability and impact of violation of the sentitive activities detected.
- Review of the status of the recommendations of the 2018 and 2021
   Human Rights due diligence process.
- Transversal and country-specific recommendations and areas for improvement in all applicable fields detected.

### **VERY HIGH**

Degree of Coverage of Prosegur's control environment

### HIGH

Degree of Protection and Commitment

109

Recommendations analyzed for 2018, 2021 and new ones

			Argentina			Brasil			Colombia		Spain			Peru		
	Sector	Country	Environment Under Control	Average Proba- billy	Country	Environ- ment under Control	Average Proba- bility	Country	Environ: ment Under Control	Average Proba- bility	Country	Environ- ment Under Control	Average Proba- bility	Country	Environ- ment Under Control	Average Proba- bility
1. Right to life	•	•		•	•		•						•	•	•	•
2. Right to liberty and security	•	•		•	•	•	•	•	•	•	•	•	•	•	•	•
The right not to be subjected to slavery, servitude, or forced labor	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
The right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment.	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Right to equality before the law, equal protection of the law, non-discrimination	•	•		•	•	•	•	•		•	•	•	•	•	•	•
11. Right to privacy	•	•		•	•	•	•	•	•	•	•	•	•	•	•	•

EVOLUTION OF THE DUE DILIGENCE PROCESS								
		2021	2024					
Year of de process	Processed for fine disputers the Statement of Statement o	A/disi extern jo e odnosto A/disi extern jo e odnosto Islamonia i Senecia Islamonia	Gamera Right Due Diligence Annah Benuh Report					
Countries	Brasil, Colombia, Chile, Paraguay and Peru.	Brasil, Spain, USA, Paraguay and Peru.	Argentina, Brasil, Colombia, <u>Spain</u> and Peru.					
Interviews	Main key areas.	25 interviews.	64 interviews.					
Main conclusions	Prosegur had 85% of effective and partially effective controls to prevent or control HR Issues related to its business.	The entity's maturity in the protection and respect of human rights was confirmed to be high and responds to the commitments defined in its Corporate Policy for the Protection and Respect of Human Rights.	The countries and businesses under study show full integration with corporate guidelines on Human Rights. Tools are in place to cover the risks inherent to their business activities.					
Recommendations identified	49 recommendations were identified.	9 cross-cutting recommendations and 23 specific recommendations.	A total of 109 recommendations from this and previous years have been analyzed.					

<sup>\*</sup>All existing lines of business in the country under study. See details in section "1. Objective and scope".



# 2. Resumen ejecutivo

	Argentina			Brasil			Colombia		Spain			Peru				
	Sector	Country	Environment Under Control	Average Proba- bility	Country	Environ- ment Under Control	Average Proba- bility									
1. Right to life																
2. Right to liberty and security		•		•	•	•	•	•	•	•		•	•	•	•	•
3. The right not to be subjected to slavery, servitude, or forced labor		•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
4. The right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment.	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Right to equality before the law, equal protection of the law, non-discrimination		•		•	•	•	•	•		•	•	•	•	•	•	•
11. Right to privacy		•	•	•	•	•	•	•	•	•		•	•		•	•



# 2. Executive Summary

The analysis has made it possible to obtain a complete diagnosis of the maturity of Prosegur's due diligence management, on this basis. On that basis:

### It has been concluded that,

- The countries and businesses under study show full integration with corporate Human Rights guidelines (training, policies, etc.).
- ➤ It can be seen how Prosegur continues to advance in its maturity related to the protection and respect for Human Rights.
- The Company has control mechanisms at local and corporate level that cover the risks inherent to its business activity.
- ➤ A **high degree of proactivity** is demonstrated in the definition of the time horizons associated with the areas for improvement detected.

# The following are considered to be the main opportunities for boosting,

- \*Extension of best practices in Human Resources to all employees (i.e. performance evaluations, career plans, etc.).
- \*Formalization of procedures in operations particularly exposed to possible violations (areas with high biodiversity, contact with indigenous communities, contact with human rights defenders, etc.).
- Review of communication channels to ensure the integration of the direct collective in the initiatives and communications associated with Human Rights, such as diversity, etc.
- ❖ Formalize in Prosegur's general clauses the lack of respect for Human Rights as a specific cause for termination, throughout the value chain (with regard to suppliers and customers, for example).



3. Methodology.

The Human Rights due diligence analysis has been carried based on the following methodology:

Starting with an initial analysis, in which Human Rights have been identified in relation to Prosegur's lines of business (1), the sensitive activities associated with these have been detected (2) and, together with the results obtained from an exhaustive analysis of the countries selected for the study in 2024 and of the security sector, have made it possible to determine the key aspects to be addressed (3). From this analysis process it has been possible to obtain a better understanding of Prosegur's control environment and possible opportunities to boost it (4).

The methodological issues associated with the process are detailed in the following stages and are developed in the subsequent slides:

	Definition and Applicability of Human Rights.			
1. Initial Analysis	Study of the Normative commitment.			
	Study of the Stakeholders relations.			
2. Sensitive Activities & Salient Risks	Identification of sensitive activities and Assesment of their probability and impact.			
	Determination of outgoing risks.			
	Sector.			
3. Detailed Analysis	Environment.			
	Country.			
4. Recommendations	Recommendations.			
4. Recommendations	Evolution of the Due Diligence Process.			



1. Initial Analysis	Stage Results
Definition and Applicability of Human Rights.	<ul> <li>Expansion of IFC Human Rights Definitions in the Risk</li> <li>Matrix</li> <li>List of Human Rights applicable to Prosegur's businesses.</li> </ul>

First, the definition of the 35 Human Rights recognized by the International Finance Corporation (IFC) has been expanded on the basis of various sources (ICCPR, ICESCR, UN, etc.), which will allow a better understanding of them.

Based on this understanding and taking into consideration the business activities carried out in Prosegur's different lines of business, the Human Rights that will be considered applicable for the Due Diligence 2024 exercise have been identified. All this has been reflected in Prosegur's Human Rights Risk Matrix.

In this regard, it has been determined that the Human Rights applicable to the exercise are as follows:

Right to life	Right to marry and raise a family.	The Right to enjoy just and favorable working conditions.
2 Right to freedom and security	18 Right to freedom of thought, conscience and religion.	Right to form and participate in trade unions and the right to strike.
3 Right not to be subjected to slavery, servitude or forced labor.	19 Right to freedom of opinion, information and expression.	27 Right to an adequate standard of living.
Right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment.	20 Right to freedom of assembly.	28 Right to health.
Right to equality before the law, equal protection of the law, non-discrimination.	21 Right to freedom of association.	29 Right to education.
11 Right to privacy.	The right to social security, including social insurance.	Right to take part in cultural life, to benefit from scientific progress, material and oral rights of authors and inventors.
15 Right to protection of the child.	24 Right to work.	35 Rights of minorities.



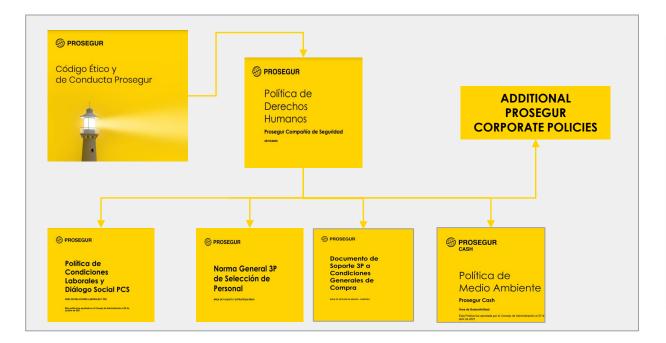
# 3. Methodology.

1. Initial Analysis	Stage Results
Study of the Normative commitment & Stakeholder relations	<ul> <li>Exhaustive analysis of Prosegur's documentation in order to obtain an understanding of the regulatory commitment.</li> <li>Analysis of the latest 'proxy advisor' reports.</li> <li>Understanding of the Company's relationship with the main stakeholders.</li> </ul>

Once the Human Rights applicable to the exercise have been identified, the regulatory structure of the Prosegur Group for the protection of Human Rights has been analyzed. This is headed by its Code of Ethics and its Human Rights Policy, which ensures that the commitment is applied transversally to all subsidiaries, activities and lines of business, in all countries where it is present.

Adicionalmente, se ha llevado a cabo un análisis de los últimos informes emitidos por los "proxy advisor" y se han analizado las entrevistas mantenidas con los principales stakeholders de Prosegur en el estudio de la Doble Materialidad.

Todo ello ha sido clave a la hora de elaborar los cuestionarios que se han utilizado para sistematizar las entrevistas con los principales responsables de los negocios y países objeto del estudio.



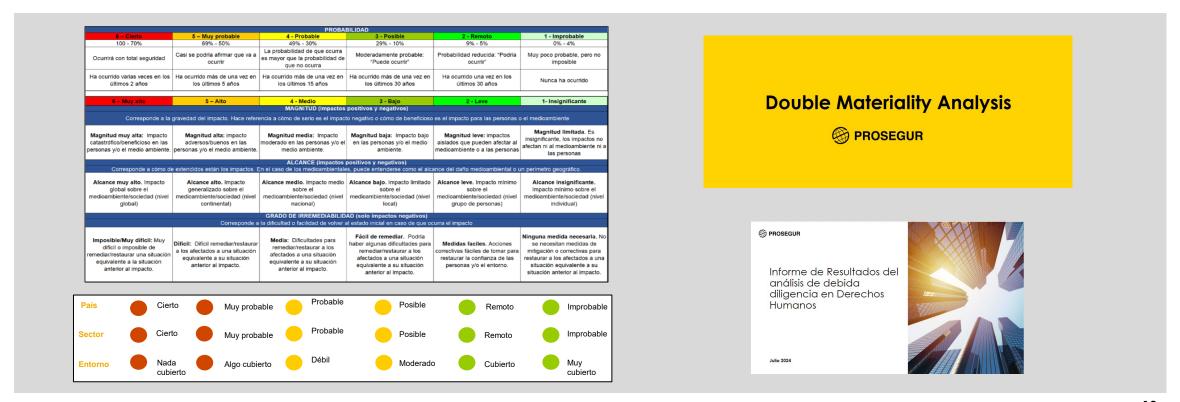




# 2. Sensitive Activities & Salient Risks Identification of sensitive activities and Assesment of their probability and impact. | Risk matrix, including sensitive activities and outgoing risks, classified according to their probability and impact.

The latest European legislative changes and, specifically, the Corporate Sustainability Reporting Directive (CSRD) have introduced the concept of "Dual Materiality", extending the classic materiality to two types, Financial and Impact. In 2024, Prosegur, in order to adapt to the new European CSRD regulations, has undergone a Dual Materiality analysis.

Following the European Sustainability Reporting Guidelines of EFRAG, Prosegur adapts the measurement scales of Dual Materiality to the assessment of the impact and/or probability in the Country, Sector and Control Environment. However, the color scale has been simplified to facilitate reading comprehension throughout the report.





2. Sensitive Activities & Salient Risks	Stage Results
Identification of sensitive activities and Assesment of their probability and impact.	Risk matrix, including sensitive activities and outgoing risks, classified according to their probability and impact.

Considering the 21 Human Rights applicable to the study, we proceeded to detect the possible sensitive activities associated with them, obtaining 55 sensitive activities. Subsequently, they have been evaluated based on the scale previously defined with the Dual Materiality analysis (see next slide):

AS 1	Indiscriminate use of force	AS 12	Training on the use of firearms and other means of control and protection	AS 23	Installation and maintenance of alarm equipment
AS 2	Excessive use of force and/or lack of proportionality in the use of force	AS 13	Operations in places with protected biodiversity	AS 24	Intervention in alarm situations
AS 3	Threat to workers' health	AS 14	Use of armored vehicles	AS 25	Access control
AS 4	Arbitrary and/or unjustified detention	AS 15	Use of light vehicles in services (response and surveillance)	AS 26	Transport protection
AS 5	Improper treatment of employees (threats, coercion, etc.)	AS 16	Waste and emissions management	AS 27	Carrying of firearms
AS 6	Hiring under threat or illegal practices (placement and recruitment fees, etc.)	AS 17	Implementation of sustainable practices and minimization of negative impacts on the environment.	AS 28	Carrying of personal protection methods (excluding firearms)
AS 7	Free employment resignation	AS 18	Personal protection services	AS 29	Mobile surveillance
AS 8	Working under the legal minimum age	AS 19	Events security	AS 30	Electronic surveillance
AS 9	Use of torture or other punishments in detention situations	AS 20	Surveillance of critical facilities (i.e. financial establishments, mining operations, etc.)	AS 31	Handling of conflict situations and use of force
AS 10	Discrimination in hiring	AS 21	ties (i.e. financial establishments, mining operations, etc.) Transportation of valuables	AS 32	Monitoring of employee activities and compliance with internal regulations
AS 11	Health and safety training	AS 22	Information gathering in private investigation	AS 33	Conducting prior consultations and obtaining consents in the development of operations



# 3. Methodology.

2. Sensitive Activities & Salient Risks	Stage Results
Identification of sensitive activities and Assesment of their probability and impact.	<ul> <li>Risk matrix, including sensitive activities and outgoing risks, classified according to their probability and impact.</li> </ul>

AS 34	Impossibility of obtaining basic health benefits.	AS 43	Management of additional benefits such as insurance and compensation	AS 52	Handling negotiations with labor unions and workers' associations.		
AS 35	Impossibility of receiving benefits for temporary or permanent incapacity.	AS 44	Fulfillment of obligations with the Public Administration	AS 53	Resolving labor disputes		
AS 6	Ineligibility for maternity and paternity benefits.	AS 45	Granting of temporary or permanent disability benefits	AS 54	Communication and information from workers' representatives.		
AS 37	Failure to receive a minimum wage to live with dignity	AS 46	Granting of marriage, breastfeeding or maternity/paternity leave	AS 55	Prevention of risks associated with the job position.		
AS 38	Unjustified dismissal	AS 47	Respect for the balance between the professional and personal spheres of employees and for work disengagement.				
AS 39	Failure to prevent risks associated with the job position	AS 48	Development of employees' professional careers				
AS 40	Prohibition of access to communication and information from workers' representatives	AS 49	Granting employees the right to resign from their jobs.				
AS 41	Damage to the environment of the regions in which it operates	AS 50	Hiring free of threats or other illegal practices (placement and recruitment fees, etc.)				
AS 42	Impact on indigenous communities	AS 51	Supervision, maintenance and renewal of safe work equipment				

2. Sensitive Activities & Salient Risks	Stage Results
Determination of outgoing risks.	<ul> <li>List of outgoing risks, classified according to their probability and impact.</li> </ul>

Once the impact and probability assessment has been carried out according to the scales defined for the Dual Materiality study, a risk reduction adjustment has been made based on what has been identified (standards, commitments, good practices, etc.) in Prosegur's control environment. As a result, it has been possible to obtain the residual risk of sensitive activities and a classification to prioritize action plans.

# TOP 10 SENSIBLE ACTIVITIES

AS 20	Surveillance of critical facilities (i.e. financial establishments, mining operations, etc.)	
AS 24	Intervention in alarm situations	
AS 27	Carrying of firearms	
AS 1	Interactions with communities	
AS 3	Protection of disputed land	
AS 33	Conducting prior consultations and obtaining consent in the development of operations	
AS 9	Training of personnel on the proportionality of the use of force	
AS 12	Training on the use of firearms and other means of control and protection	
AS 2	Interaction with human rights defenders	
AS 13	Operations in places with protected biodiversity	

### 3. Detailed Analysis

#### Stage Results

### Sector

Detailed analysis of the sector, country and control environment.

An exhaustive study of the private security sector has been carried out based on various international sources such as UNEP FI, OECD, IPIECA, UNBHR and DOW JONES, which have made it possible to identify a comprehensive view of the challenges facing the sector.

Specific risks include the violation of human rights, highlighting the possibility of unfair labor practices. These risks are compounded by general factors in the country environment, such as lack of effective regulation, corruption and lack of transparency in operations.

#### **GENERAL RISK FACTORS**

- Immature legal framework
- Inadequate enforcement of labor laws
- Cultural acceptance of long working hours in certain industries or countries
- •"Zero-hour contracts" where regular hours of work are not guaranteed
- Low wages
- Irregular labor
- Inefficient processes and poor HR management at suppliers Spikes in average cost of living due to inflation

#### SPECIFIC RISK FACTORS

- Long working hours
- Disparity in working hours for women vs. men
- Increase in temporary contracts
- Wage gaps
- •The number of women in the sector is only 13% compared to 87% of men.
- Impact of COVID-19
- 49% of workers in the sector have an intermediate level of education.



















#### Sources:

- United Nations Global Compact
- International Labour Organization
- IPIECA

- United Nations Environment Programme Finance Initiative
- OCDE
  - Dow Jones

# 3. Detailed Analysis Sector Detailed analysis of the sector, country and control environment.

The study made it possible to classify human rights according to the risk of violation in the private security sector and to prioritize the issues to be addressed with key stakeholders.

Scope	Sector	
1. Right to life	PROBABLE	
2. Right to liberty and security	PROBABLE	
3. The right not to be subjected to slavery, servitude or forced labor.	REMOTE	
<ol> <li>The right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment.</li> </ol>	PROBABLE	
Right to equality before the law, equal protection of the law, non-discrimination	VERY PROBABLE	
11.Right to privacy	POSSIBLE	
15. Right to child protection	REMOTE	
16. Right to marry and form a family	REMOTE	
18. Right to freedom of thought, conscience and religion	PROBABLE	
19.The right to freedom of opinion, information and expression.	POSSIBLE	
20. Right to freedom of assembly	PROBABLE	

Scope	Sector	
21.Right to freedom of association	PROBABLE	
23. Right to social security, including social insurance.	POSSIBLE	
24. Right to work	POSSIBLE	
25. The right to enjoy just and favorable working conditions, including rest and leisure.	POSSIBLE	
26. The right to form and participate in trade unions and the right to strike.	PROBABLE	
27. Right to an adequate standard of living	POSSIBLE	
28. Right to health	VERY PROBABLE	
29. Right to education	POSSIBLE	
30. The right to take part in cultural life, to benefit from scientific progress, material and oral rights of authors and inventors.	REMOTE	
35. Rights of minorities	PROBABLE	



### 3. Detailed Analysis

### Country

The Human Rights Risk Matrix is being updated.

In it, the risk has been determined based on various indicators and studies by different institutions (Amnesty International, World Bank, Prison Studies Institute, ILO, etc.). In those countries studied in previous Due Diligence studies, a comparison has been established in order to observe the increase or decrease in risk.

In all indicators, a transposition to values from 1 to 6 has been carried out to ensure the alignment of the scale with the Dual Materiality analysis (detailed in phase "2. Sensitive activities and salient risks - Identification of sensitive activities and assessment of their probability and impact".

The analysis has made it possible to prioritize the issues to be discussed with key stakeholders in each country.

Detailed analysis of the sector, country and control environment.

Stage Results

### Matriz de Riesgos

Análisis de debida diligencia en Derechos Humanos

Julio 2024

### **Environment**

Based on the analysis of the supporting documentation provided, and the interviews held with the heads of the businesses and transversal areas, in which the key issues associated with their country and business were discussed, a risk classification was carried out, again aligned with the Dual Materiality analysis.

In this way it has been possible to obtain the degree of risk coverage provided by Prosegur's control environment (regulations, good practices, etc.).

In addition to obtaining the average probability of the criticality of each area by country, the contrast allows a comparison between the sector, the country and the reality of Prosegur.

Entorno de control

Entorno

Ent

Detailed analysis of the sector, country and control environment.



4. Recommendations.	Results stage
2024 Recommendations	- 2024 Recommendations.

In those areas, by country and business, where areas for improvement have been identified, recommendations are defined, i.e. measures to mitigate the associated risk or opportunities for improvement based on the best practices identified. In all cases, action plans will be defined with an associated time horizon.

Time horizon			
Short Term (6 months)	A "Short Term" time horizon is identified for those Recommendations whose implementation is of low criticality and complexity.		
Medium Term (1 year)  A "Medium Term" time horizon is identified for those Recommendations whose implementation is of medium or high complexity, whether their criticality is low, medium or high.			
Long Term (more than 1 year)  A "Long Term" time horizon is identified for those Recommendations whose implementation is of high or medium criticality and high or medium complexity.			
Pending	Those "Grade 1 Recommendations" from previous years that have not been fully implemented have been identified as overdue.		

Criticality			
Grade 1	1	Those measures whose implementation is necessary to mitigate the risk associated with a sensitive activity are classified as "Grade 1 Recommendations". With respect to recommendations from previous years that have not yet been fully implemented, those classified as "Measures to be implemented" have been given a "Grade 1" status.	
Grade 2	2	Those opportunities for improvement that are in line with best practices are classified as "Grade 2 Recommendations". With respect to recommendations from previous years that have not yet been fully implemented, those classified as "Additional Recommendations" have been given a "Grade 1".	



# 3. Methodology

4. Recommendations.

Evolution of the Due Diligence Process

Review of recommendations from previous years

As a result of the analysis process, we can see how the countries of study have been renewed, the number of interviews has been increased and previous recommendations have been revised.

EVOLUTION OF THE DUE DILIGENCE PROCESS					
	2018	2021	2024		
Year of de process	Proceso de <i>due diligence</i> de Derechos Humanos  Julio de 2018  Documento confidencial	Análisis externo de debida diligencia en Derechos Humanos	E PROSEGUR  Human Rights Due Diligence Analysis Results Report		
Countries	Brasil, Colombia, Chile, Paraguay and Peru.	Brasil, Spain, USA, Paraguay and Peru.	Argentina, Brasil, Colombia, Spain and Peru.		
Interviews	Main key areas.	25 interviews.	64 interviews.		
Main conclusions	Prosegur had 85% of effective and partially effective controls to prevent or control HR issues related to its business.	The entity's maturity in the protection and respect of human rights was confirmed to be high and responds to the commitments defined in its Corporate Policy for the Protection and Respect of Human Rights.	The countries and businesses under study show full integration with corporate guidelines on Human Rights. Tools are in place to cover the risks inherent to their business activities.		
Recommendations identified	49 recommendations were identified.	9 cross-cutting recommendations and 23 specific recommendations.	A total of 109 recommendations from this and previous years have been analyzed.		

