



Compliance Policy of Prosegur Compañía de Seguridad, S.A.

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1. Purpose

Prosegur Compañía de Seguridad, S.A. (hereinafter the "**Company**" or "**Prosegur**") is strongly committed to ensuring that its behaviour and the behaviour of everyone who forms part of it complies with all current regulations and ethical principles. For this reason, the Company has a Regulatory Compliance Programme that establishes the measures designed to identify, mitigate and eliminate the risks of regulatory non-compliance in all its activities. Implementation of this Programme is the responsibility of the compliance committees and compliance officers in the countries in which the Company operates. It is overseen by the Regulatory Compliance Committee, which works autonomously and independently, reporting its main conclusions regularly to the Audit Committee, including during approval of the Regulatory Compliance Report.

In this regard and with a firm commitment to ensuring compliance with ethical principles, good corporate governance, transparency and integrity, the Company's priority objective is to implement a solid corporate culture that has regulatory compliance and the Company's ethical values as the central element of our business model and decision-making.

The purpose of this Compliance Policy (hereafter, the "**Compliance Policy**") is to establish criteria and guidelines for action, as a set of elements implemented and actions performed in the Company and its Group to ensure knowledge, understanding and compliance with all the regulations and policies in this area by all its employees. This aims to achieve the three main objectives of prevention, detection and response in relation to regulatory compliance.

2. Scope of application and reach

This Compliance Policy applies to the Company and to the companies in its group in which Prosegur has control (the "**Group**" or "**Prosegur Group**").

In those investee companies where this Policy is not applicable, the Company will promote the alignment of the investee's policies with those of the Company through its representatives on their management bodies.

It is also applicable to contracted companies acting on behalf of the company, as well as joint ventures and other such companies, where the Company is responsible for their management.

3. General Principles

Through this Policy, Prosegur sends a resounding message of opposition to all irregularities and illegal acts, whether criminal or of any other kind, to all its executives and employees, and to third parties who have dealings with the Company. Prosegur is committed to combating these acts and preventing any harm to its image and reputation.

Without prejudice to the provisions of the Code of Ethics and Conduct, the fundamental principles that must govern Prosegur are:

- **Compliance with and promotion of legality and internal regulations:** Respect for the law is one of the core principles of Prosegur. All employees have an overriding and mandatory duty to observe prevailing legislation and internal regulations that apply to them in the exercise of their professional duties and responsibilities. The Company fosters knowledge of and respect for these principles.
- **Dissemination of the Regulatory Compliance Programme and training:** Disseminate the Regulatory Compliance Programme and make the principles and standards it contains available to all employees, raising awareness and providing ongoing training on its content to all Company employees.
- **Independence and transparency in relations with third parties:** Independence and transparency in relations with third parties are crucial values for Prosegur. Employees will always act impartially and objectively, applying independent judgement free from any external pressure or personal interest.
- **Respect for the image and reputation of Prosegur:** Employees must employ the utmost care and due diligence to uphold the image and reputation of Prosegur in all their professional activities, including public appearances.
- **Existence and knowledge of appropriate policies and procedures:** Prosegur has appropriate policies and procedures for its activity and structure to prevent the risks that may arise.
- **Establishment of internal controls:** Prosegur has implemented general preventive controls that form the basis of its risk control and are effective in mitigating generic non-compliance risk. It also has specific controls and measures to mitigate particular non-compliance risks.
- **Adequate provision of resources:** Provide the Regulatory Compliance Department with sufficient financial, material and human resources for its development, within an appropriate framework for the definition, implementation, monitoring, supervision and achievement of the objectives of the Regulatory Compliance Programme.
- **Assistance and collaboration with the Authorities:** Provide the assistance and cooperation that may be required by judicial, administrative or any national or international supervisory body, to verify compliance with Prosegur's legal

obligations.

- **Obligation to report possible illicit conduct:** Employees are required to report any potential breaches of the Prosegur Code of Ethics and Conduct, and its internal regulations, and any actions that may be considered unlawful or criminal of which they become aware or suspect, through the Company's Whistleblower Channel.
- **Monitoring and continuous improvement:** The tools in the control structure, audits, investigations, information communication channels and situations of conflict or complaints represent a core element for the operation and improvement of the model. Management of these tools is essential for achieving a structured model through continuous improvement to achieve the objectives of the framework.

4. Regulatory Compliance Programme

Prosegur has designed a Regulatory Compliance Programme that, through a due diligence model based on a risk approach and under the principles: formalises, implements, communicates, monitors and safeguards regulatory compliance. This programme includes a raft of policies and procedures, prevention manuals, guidelines for conduct and behaviour, internal controls, awareness-raising and training activities, and an on-going process of critical evaluation and supervision to ensure continuous improvement. This enables the detection, mitigation and elimination of non-compliance risks through immediate response in relation to the prevention of money laundering, privacy and personal data protection, promoting competition and avoiding unfair competition, preventing criminal activities and fighting corruption.

This programme complements and develops Prosegur's Code of Ethics and Conduct, which is the core and reference standard for the Company and its Group that governs its day-to-day activities and how it relates to its employees, shareholders, customers and users, suppliers, authorities, public administrations, regulatory bodies, competitors and, in particular, society as a whole.

The pillars of Prosegur's Regulatory Compliance Programme are, fundamentally, the following:

- **Code of Ethics and Conduct:** Prosegur has a binding Code of Ethics and Conduct that must be known, accepted and respected by all employees and members of Prosegur's governing bodies. This is a guide that sets down the standards of behaviour and good practice for all employees of the Company. The document contains a series of updated guidelines on behaviour, principles and values that are mandatory for all Prosegur employees. Prosegur employees will avoid any conduct that may harm the reputation of the Company and negatively affect its interests.

- **Whistleblower Channel and Whistleblower Channel Policy:** Prosegur has a Whistleblower Channel for reporting any behaviour that might represent an irregularity or act contrary to the law or the rules of conduct in the Code of Ethics and Conduct, internal regulations or prevailing legislation. The Whistleblower Channel is regulated and developed in a specific Policy. All Prosegur employees are required to report any incidents or irregularities that infringe the Code of Ethics and Conduct, internal regulations or prevailing legislation of which they become aware, through the Whistleblower Channel. Likewise, anyone or any stakeholder not directly related to Prosegur who wishes to report any irregularities of which they are aware may also use the Whistleblower Channel for such whistleblowing. The management of this Channel guarantees impartiality and independence, confidentiality, the anonymity of the whistleblower and the rights of the persons investigated. If such illegal conduct is verified, Prosegur will apply the corresponding disciplinary sanctions. All forms of retaliation are prohibited.
- **Anti-Corruption Policy:** Prosegur remains firmly committed to fighting corruption. In this regard, the Company has an Anti-Corruption Policy. Its approval responds to a criterion of maximum transparency on the part of the Company, which seeks to promote policies that regulate fundamental aspects of corporate governance. In compliance with the law, Prosegur combats any type of corruption and fosters the highest compliance standards at the global level, demonstrating its commitment to legality and the fight against corruption.
- **Crime Prevention:** The principle of due diligence is at the heart of Prosegur. This principle groups and guides the elements of internal control that prevent crimes being committed and help establish a corporate culture of the strictest responsibility in daily practices that permeates the entire Company, ensuring that good practices are encouraged and avoiding, detecting, and eradicating any illicit actions.
- **Prevention of Money Laundering:** Due to some of its activities in various countries, the Prosegur Group is bound by, and complies with, regulations on the prevention of money laundering and the financing of terrorism. In general, the Company also follows the recommendations of the Financial Action Task Force (FATF) and the international best practices that are applied in this matter by applying the following principles: Customer knowledge, transaction analysis, reporting of suspicious transactions, development of training plans and ongoing collaboration with the regulator.

- Privacy:** The protection of personal data is a requirement of the Company. This results in compliance with all applicable regulations in this area in every country where the Company operates. The purpose of this is to protect the fundamental rights and freedoms of individuals in the exercise of their activities. The Company has a Data Protection Management System that complies with the requirements established by Regulation (EU) 2016/679 on Data Protection of 27 April 2016 and is adapted to the different regulations governing this matter in the different countries where it operates.
- Protecting competition:** Prosegur strictly adheres to applicable regulations in its relations with other companies and market operators. Prosegur requires all its employees and in particular its management team, to behave ethically at all times, including strict compliance with competition regulations in the performance of their duties. The commitment to absolute compliance with competition rules is manifested in market action based on vigorous and fair competition, acting independently at all times based on its own business criteria and in the absence of any type of restrictive agreement on competition with any competitor.

5. Approval and dissemination

This Compliance Policy was approved by the Company's Board of Directors on 30 October 2024.

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

The content of this Policy may be included among the training materials for our own staff and in additional dissemination actions, as determined at any time. Those responsible for the Business and Support areas will adopt the necessary measures for the dissemination, training and compliance with this Policy.

6. Preparation

Owner:	Compliance Division		
Reviewed by:	Corporate Legal Division		
Approved by:	Board of Directors of Prosegur Compañía de Seguridad, S.A.	Date:	30 October 2024