



General Policy 3P on Employee's discrimination and harassment complaints NG/GLO/RRHH/13

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1. Owner

- Human Resources Corporate Manager

2. Scope

- This policy shall be applied in all countries in which Prosegur operates. This policy shall be known and enforced by DCRs and the Human Resources Managers of each country and their teams. At Corporate level it shall be known and enforced by DCNs and DCSs.

3. Objective

- This General Policy regulates the procedures for processing and solving complaints lodged by Prosegur's employees who believe they have been subjected to discrimination of any kind (e.g. race, sex, religion, and so on), psychological harassment or sexual harassment by their peers or superiors.

4. Development

4.1. Definitions

- Discrimination.** Discrimination and harassment at the workplace takes place when an employer intentionally treats an employee differently because of his race, colour, religion, civil status, social status, political ideas, membership of a trade union, national origin, disability, gender, sexual orientation (this varies between States) or age, either during recruitment, discipline, when carrying out job duties or at the time of termination of the contract.
- Psychological harassment (mobbing).** Psychological harassment or mobbing is the phenomenon by which a person or group of persons inflicts severe, systematic and recurrent psychological violence for a long time on another person(s) at the work place, in order to destroy the communication networks of the victim or victims, destroy their reputation, disrupt the performance of their duties and finally make that person(s) to end up leaving the workplace.
- Sexual harassment.** Any conduct, proposal or requirement of a sexual nature that takes place in the organization or management of the company, that the perpetrator knows or is capable of knowing that is unwelcome, unreasonable and offensive for the sufferer, whose submission or rejection may affect his job or working conditions, is considered to be sexual harassment.



- It should be noted that the employee's complaints of discrimination and harassment under this General Policy 3P have nothing to do with the complaint handling Channel under the General Procedure 3P whose purpose is wider in terms of type of complaints and which is a channel available to both employees and customers or anyone who has any kind of relationship with Prosegur and the complaints received have a different treatment.

4.2. Discrimination Complaints Channel

- The Human Resources managers of the countries must establish a communication channel where workers who wish to complain about this type of inappropriate behaviour by their superiors or peers are able to do so, and their complaints dealt with.
- The Human Resources Corporate Department has an email address so that the employees who wish to do so may submit their complaints.
- The Human Resources Corporate Department, or the HR Department in each country, has to disseminate among employees the existence of the communication channel by the means considered most effective and must establish a simple procedure to ensure that the complaints made by employees reach the persons in charge of taking action and settling the complaint.

4.3. Guiding Principles of action for discrimination complaints

- Compliance with the legislation and local labour agreements.
- Ensure confidentiality and protect the dignity of those affected.
- Diligence and efficiency in the investigation and resolution of the conflict.
- Impartial hearing and fair treatment for all persons concerned.
- Pursuit of truth and appraisal of relevant facts.
- Guarantee that the person in charge of procedure has the power to investigate.

4.4. Appointment of the person in charge of the procedure

- The HR Manager of the geographical area in which the employee has an employment relationship with Prosegur must assign the complaint to a person who must initiate the appropriate investigation process, while ensuring its confidentiality.
- Where the seriousness of the complaint so requires, the investigation and resolution of the procedure may be entrusted to an outside specialist.



4.5. Procedure for investigation of a complaint

- The investigation process must meet the guiding principles of action described herein.
- All investigation processes should include the following:
 - Take statements or evidence of the parties involved.
 - Examine the evidence offered by the parties (take statements from employees who have been designated by the parties as evidence to prove their respective versions of the facts under investigation). The statements collected should be documented, and once read must be signed by the author thereof.
 - Report on the findings of the investigation.
 - Adoption of measures to resolve the conflict.
 - If the facts of the complaint were confirmed, appropriate disciplinary measures should be adopted against the respondent.
 - If there is no clear evidence to establish the veracity of the facts claimed but it is found that there is a labour dispute at work, the Human Resource Department of the country should do all in their power to solve the conflict.
 - Finally, if the falsehood of the complaint made is established, appropriate disciplinary action will be taken against the complainant.

4.6. Commitment to set a time limit for the resolution of complaints

- When the report of the actions that the complaint has given rise to is transferred to the HR Manager, the necessary steps to solve the dispute should be taken within a month of receiving such report.

4.7. Safe-keeping of documents

- When dealing with these complaints, the Human Resources Manager of each geographical area shall include in the procedure the system for document safekeeping and the time limit of the same.

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5. Related documents:

Code	Name