

# External Human Rights Due Diligence Analysis

October 2021





# 1. Context & Methodology



# Project Objective

Three years after the first external review of its Human Rights Due Diligence, Prosegur has established the commitment to continue carrying out this external review exercise periodically as an additional control to its management systems, and with the following objectives:

1. To update **the risk maps according to the country and sector linked to Human Rights** in order to determine the inherent risk resulting from a possible violation of human rights.
2. **Determine the level of maturity of the mechanisms, procedures and controls** currently in place globally and locally for each of the countries of application.
3. Review **the status of the recommendations** of the 2018 HR due diligence process and see how Prosegur Cash has evolved in this area.
4. Obtain **recommendations, measures to be implemented and opportunities** to drive cross-cutting and by country.





# Project step by step





# Evaluation process step by step

1

The **human rights that could be potential risks** in terms of violation of these human rights applicable to Prosegur's Cash business have been identified. In turn, these human rights have been linked to Prosegur's Cash Human Rights policy and the affected stakeholder group.

2

The likelihood of **human rights violations in each country has been assessed by means of a map with the possible risks according** to the line of business. Based on this analysis, 4 countries have been identified to be reviewed as a sample (Paraguay, Peru, Spain and Brazil).

3

The **maturity of the processes, mechanisms and due diligence elements established to prevent and mitigate** the potential risks identified in the risk maps has been checked, diagnosing the level of the control environment established at local and global level.



**Prosegur's human rights evaluation**

**September 2021**



# Evaluation process step by step

## 1

### How have we carried out the identification?

- ✓ Based on the list of 35 Human Rights included in the IFC's Human Rights Impact Assessment and Management Guide, those that apply to Prosegur's Cash business have been identified.
- ✓ Definition of possible risk events applicable to Prosegur's Cash activities.
- ✓ Identification of the stakeholders that may be affected by each of the identified risk events.
- ✓ Linking each risk event with the commitments defined and included in Prosegur's Cash Human Rights Policy.

Source: [The International Finance Corporation's Human Rights Impact Assessment and Management Toolkit](#)

## Risk events

Tabla 1. Identificación de los Derechos Humanos en el Proyecto de Inversión (DHHI) 2000 (Impact Assessment & Management Toolkit)										
Nº	Derecho	Impacto Potencial	Relevancia para el negocio	Relevancia para el cliente	Relevancia para el proveedor	Relevancia para el socio	Relevancia para el empleado	Relevancia para el consumidor	Relevancia para el inversor	Relevancia para el proveedor de servicios
1	Derecho a la vida	Relación de riesgo	SI	SI	SI	SI	SI	SI	SI	SI
2	Derecho a la libertad y seguridad	Derecho a la libertad y seguridad	SI	SI	SI	SI	SI	SI	SI	SI
3	Derecho a un juicio justo	Derecho a un juicio justo	SI	SI	SI	SI	SI	SI	SI	SI
4	Derecho a un juicio justo	Derecho a un juicio justo	SI	SI	SI	SI	SI	SI	SI	SI
5	Derecho a la privacidad	Derecho a la privacidad	SI	SI	SI	SI	SI	SI	SI	SI
6	Derecho a circular libremente	Algunos	No	No	No	No	No	No	No	No
7	Derecho a solicitar asilo por persecución en otro país	Algunos	No	No	No	No	No	No	No	No
8	Derecho a tener una nacionalidad	Algunos	No	No	No	No	No	No	No	No
9	Derecho a la igualdad de trato	Trabajo forzoso	SI	SI	SI	SI	SI	SI	SI	SI
10	Derecho a trabajar y formar una familia	Condiciones de trabajo	SI	SI	SI	SI	SI	SI	SI	SI
11	Derecho a la propiedad individual	Algunos	No	No	No	No	No	No	No	No
12	Derecho a la propiedad comunitaria	Algunos	No	No	No	No	No	No	No	No
13	Derecho a la libertad de expresión, información y opinión	Algunos	No	No	No	No	No	No	No	No
14	Derecho a la libertad de reunión	Algunos	No	No	No	No	No	No	No	No
15	Derecho a participar en la vida pública	Algunos	No	No	No	No	No	No	No	No
16	Derecho a la seguridad física, incluido el seguro social	Algunos	SI	SI	SI	SI	SI	SI	SI	SI
17	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
18	Derecho a la libertad de movimiento	Algunos	No	No	No	No	No	No	No	No
19	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
20	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
21	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
22	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
23	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
24	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
25	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
26	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
27	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
28	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
29	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
30	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
31	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
32	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
33	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
34	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No
35	Derecho a la libertad de asociación	Algunos	No	No	No	No	No	No	No	No



# Probability of risk events

## 2 What parameters have we defined for the probability?

### PROBABILITY OF EVENTS

Ámbito	1	2	3	España		Estados Unidos	
	Sector	País	Entorno de control	País	Entorno de control	País	Entorno de control
<b>1- Igualdad de trato en los procesos de gestión de personas</b>							
Contratación (interna y externa) y promoción	●	●	●	●	●	●	●
Jubilaciones y despidos	●	●	●	●	●	●	●
<b>2- Condiciones laborales justas</b>							
Horario laboral y tiempo de descanso	●	●	●	●	●	●	●
Permisos	●	●	●	●	●	●	●
Remuneración y beneficios sociales	●	●	●	●	●	●	●
Estudiantes en prácticas	●	●	●	●	●	●	●
Acoso en el entorno laboral	●	●	●	●	●	●	●
<b>3- La libertad en el entorno laboral</b>							
Libertad de asociación	●	●	●	●	●	●	●
Libertad de expresión	●	●	●	●	●	●	●

### 1. Sector

Main impacts of the sectors of activity linked to human rights violations.

### 2. Country

Country risk understood as the socioeconomic context and the human rights situation, based on certain indicators - child labor, forced or compulsory labor, discrimination, freedom of association, rights of indigenous populations and civil security, among others.

### 3. Operating environment

Susceptibility of the entity to a risk event in terms of its preparedness to face it, as well as its agility and adaptability to these events.



# Elements of due diligence

3

## Due diligence process defined around seven areas

**Equal treatment in people management processes**

*Hiring, Internal Vacancies, Internal Promotion, Layoffs, Retirement*

**Fair working conditions**

*Working hours and rest time, Leaves of absence, Remuneration and social benefits, Trainees, Harassment in the workplace, Workplace harassment*

**Freedoms in the work environment**

*Freedom of association  
Freedom of expression*

**Environment and workplace**

*Accessibility, Health and Safety, Employee Orientation*

**Privacy**

*Employee Privacy, Customer Privacy*

**Security in the environment**

*Added section for the security and cash business line.*

**Road Safety**

*Section added for the cash, security and alarms business line.*





## 2. Conclusions



# Executive summary: Main findings

After an exhaustive evaluation process derived from direct consultations at both local and corporate level and the analysis of the documentation received, it is concluded that:

- Prosegur Cash has obtained a degree of coverage of its control environment of **4.2 out of 5**, with 5 being the most covered level. In this sense, **an adequate level has been obtained for each of the identified** human rights risk events, both from the point of view of the processes analyzed and the due diligence elements available.
- The evaluation confirms that the company's maturity in **the protection and respect of human rights is high and responds to the commitments defined in its Corporate Policy** for the protection and respect of Human Rights.
- In the last **Human Rights Due Diligence**, 49 recommendations were issued, 67% of which have been adopted and 27% of which are currently being implemented.

Based on the above, 41 recommendations were issued, of which 9 are opportunities for corporate promotion, and 32 are focal points for action at the local level.

The executive summary of the analysis is shown below.

4,2/5

Coverage Grade

HIGH

Protection and  
engagement

Evolution DD\_2018:

- 63% measures adopted
- 30% measures being implemented

→ At the corporate level, 9 opportunities for promotion have been identified.

→ At the local level, 7 areas of action have been identified, with a total of 32 focuses of action:

- Equal treatment in people management processes (7)
- Fair work condition (9)
- Freedom in the work environment (3)
- Environment and workplace (3)
- Privacy (2)
- Security in the environment (4)
- Road safety (4)

