



**PROSEGUR**  
**CASH**

# **Policy on Ethical Channel CASH**

**COMPLIANCE AREA**

# 1. Owner

Global Compliance Director

# 2. Scope

This document applies to anyone affected by the Code of Ethics, and anyone who, regardless of its applicability, reports an incident or irregularity through the Ethical Channel.

The terms incident and irregularity shall be construed as any act allegedly violating the law, the general principles of engagement and ethical conduct set out in the Code of Ethics, or in the internal regulations applicable to Prosegur Cash. This shall also apply to any breach which could constitute the commission of an offence attributable to a legal person.

Whistleblowing through the Ethical Channel may address issues and matters including, yet not limited to, the following:

- Financial and accounting irregularities
- Non-compliance with internal regulations and policies
- Unethical conduct or conflicts of interest
- Theft, embezzlement or fraud
- Bribery, kickback and corruption
- Insider trading or insider information
- Harassment or discrimination at work
- Environmental matters
- Human rights vulnerabilities

In this regard, communications that deal with issues for which there is a specific channel, such as customer support or employee services, will not be processed through the Ethical Channel.

Whistleblowing on incidents can be carried out through the Ethical Channel that Prosegur Cash has set up on the corporate website and at Prosegur Cash, S.A. premises.

Whenever such a communication is received through another channel, employees have the duty to inform the Compliance Department so that the communication can be redirected to the Ethical Channel.

# 3. Purpose

This Policy regulates the Ethical Channel of Prosegur Cash, S.A. and the companies of its business group (hereinafter "Prosegur Cash"), which serves as a whistleblowing channel for reporting incidents or irregularities of potential importance that may violate the Prosegur Cash Code of Ethics and Conduct (hereinafter the "Code of Ethics"), and guarantees that they will be

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dealt with objectively, independently, anonymously and confidentially, adopting the appropriate measures to ensure effective compliance with the Code of Ethics.

The Ethical Channel is a tool through which employees and anyone related to the Company, including directors, shareholders, suppliers, contractors or subcontractors, can blow the whistle on any conduct that could constitute a crime, harassment or be contrary to the principles and values of the organization, thereby guaranteeing transparency and good corporate governance.

## 4. Preparation and Approval

Drafted by:	Compliance Department				
Revised by:	Global Legal Area	Javier Aparicio Alfaro			
	Process Transformation Office	Diego Rioja Pérez			
	Sustainability Area				
Approved by:	Global Compliance Director	Miguel Soler	Date:	17/06/2021	
Replacing:	N/A	Version:	N/A	Date:	N/A

## 5. Implementation

### 5.1. Whistleblowing on incidents and irregularities

All Prosegur Cash professionals bear the duty to comply with the Code of Ethics and cooperate in its implementation. Therefore, anyone who becomes aware of any incident or irregularity that violates the Code of Ethics, internal regulations and/or applicable legislation must report it through the Ethical Channel.

Likewise, anyone or any stakeholder not directly related to Prosegur Cash who wishes to report any irregularities of which they are aware may also use the Ethical Channel for such whistleblowing.

Depending on the facts reported and factors such as the type of misconduct, country and impact, a specific working unit will be set up to effectively deal with each reported incident. The Ethics Manager, as an independent figure, oversees the Ethical Channel by continuously monitoring incoming whistleblowing and the work units with a view to ensuring that they are correctly processed and resolved.

### 5.2. Process guarantees

#### 5.2.1. Whistleblower protection

Anyone reporting an incident or irregularity in good faith through the Ethical Channel will be afforded due protection, specifically the right to protection as set out in Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.

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## 5.2.2. Confidentiality and anonymity

A whistleblower may also make a report anonymously, i.e. not disclosing his or her personal details. Similarly, if the whistleblower opts not to conceal his or her identity, he or she will be assured that his or her personal information and that of the parties involved will remain confidential.

There is also an obligation to ensure that the identity of the whistleblower is safeguarded during the process of handling communications and, where appropriate, after resolution of the matter.

Any breach of the duty of confidentiality of persons involved in the handling of whistleblowers will be investigated and, where appropriate, sanctioned.

## 5.2.3. Managing conflicts of interest

An independent, impartial and objective team handles communications received through the Ethical Channel. When setting up the investigation and resolution working unit for each specific communication, the team members chosen to deal with the whistleblowing process will undergo a preliminary screening for potential conflicts of interest. In this regard, team members with conflicts of interest are replaced with someone who can carry out the investigation, thus safeguarding independence.

## 5.2.4. Retaliation ban

Prosegur Cash assures that no retaliation will be taken, either directly or indirectly, against anyone who, in good faith, has reported an incident or irregularity through the Ethical Channel.

Similarly, actions considered to be threats, retaliation or discrimination against an employee for having made a communication through the Ethical Channel will be considered as a labour offence.

## 5.2.5. Presumption of innocence and professional honour

Whistleblowers and persons involved in any communication received through the Ethical Channel will be guaranteed the presumption of innocence, regardless of decisions that their direct managers or the Human Resources area may take regarding them.

## 5.3. Responsible use of the Ethical Channel

Whistleblowers have a duty to make responsible use of the Ethical Channel, so under no circumstances should they make unfounded or malicious reports, which in itself is understood to be a violation of the Code of Ethics and may result in legal and/or disciplinary actions that may be applicable. Respect for decorum and good manners should also be observed when reporting on someone else.

Whistleblowers must also guarantee that the data provided are true, accurate, complete and up to date, and must never be used for purposes other than those set out in the Code of Ethics.

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## 5.4. Personal data protection

The Ethical Channel safeguards the security of the process of receiving and resolving reports of incidents and irregularities, and also the people involved in the process, by applying sufficient and appropriate IT security measures for the confidential processing of the reports submitted and the confidentiality of the people involved both in the processing of the reports and in the subsequent investigation and resolution.

Prosegur Cash, S.A. is the Data Controller and the data collected through the Ethical Channel will be used for the sole purpose of processing whistleblower complaints received and, where appropriate, investigating the facts reported.

You may withdraw your consent allowing Prosegur to process your personal data at any time, and also exercise your rights to access, rectification, erasure, opposition, limitation of data processing, data portability, and not to be subject to automated decisions, as indicated in the "Rights of Data Subjects" section of our Privacy Policy, available by clicking on the following link: <https://www.prosegur.com/en/privacy-policy/whistleblowing-channel>

You are also informed that you have the right to lodge a complaint with the Spanish Data Protection Agency ([www.aepd.es](http://www.aepd.es)) regarding any action taken in this procedure.

Before lodging a complaint with the Spanish Data Protection Agency, if you consider that the data controller has failed to properly address your rights, you may request an assessment from the Data Protection Officer, sending the request to: [dpo@prosegur.com](mailto:dpo@prosegur.com)

## 5.5. Advertising

Notwithstanding the obligation of employees to know and act in accordance with the provisions of Prosegur Cash's internal regulations, we shall promote the dissemination of this Policy and use of the Ethical Channel.

## 6. Documents Associated with the process

Code	Name