

Policy for the prevention, care, and punishment of sexual harassment at work

I. INTERBANK PROMOTES A FREE SEXUAL HARASSMENT WORK ENVIRONMENT

Interbank aims for safe work environments free of gender violence. We have a zero-tolerance policy for sexual harassment. We encourage that the individual differences of our employees are always respected and valued. This commitment is vital for us to continue building our vision of being the best bank from the best people and continue to achieve our objectives with responsibility and ethics hand in hand with our culture based on values.

II. OBJECTIVE

This Policy aims to prevent, correct, and sanction the various manifestations of sexual harassment. Following Law No. 27942, Law on the Prevention and Punishment of Sexual Harassment ("Ley de Prevención y Sanción del Hostigamiento Sexual"), its Regulations, approved by Supreme Decree No. 014-2019-MIMP and amending regulations.

III. AMBIT

This Policy applies to all those who provide services for Interbank (collaborators, trainees, service providers, and suppliers who have contact with Interbank's collaborators because of the commercial relationship established between the suppliers and Interbank, under any contracting modality).

IV. RESPONSIBILITIES

To effectively achieve the commitment assumed by Interbank, as well as the objective of this Policy, Interbank requires that every one of its collaborators and especially those who occupy leadership positions, take the following responsibilities:

1. Treat all persons with whom relationships are established for work reasons (collaborators, suppliers, customers, personnel of contracting companies, etc.) with respect for their dignity and fundamental rights.
2. Not to engage in behaviors, attitudes, or actions of sexual or sexist connotations that may be offensive, humiliating, degrading, annoying, intimidating, hostile, or reinforce stereotypes that imply the subordination of one gender concerning the other.
3. Act appropriately when witnessing behaviors, attitudes, or actions that constitute sexual harassment: not ignoring them, not tolerating them, expressing their disagreement, preventing them from being repeated or aggravated, and communicating them to the authorities designated in this Policy.

Interbank is responsible for establishing the following dispositions for the prevention, care, and punishment of sexual harassment:

1. Conduct annual evaluations to identify potential sexual harassment situations or risks of sexual harassment occurring.
2. Carry out training actions on the prevention of sexual harassment. These actions are carried out at the beginning of the employment relationship of new collaborators, and periodically.
3. Share among all its collaborators the content of this Policy and the formats for the presentation of the complaint. Emphasis is placed on publicizing the reporting channels established to deal with complaints of sexual harassment within the company and those conducted by State institutions.
4. Implement the Sexual Harassment Intervention Committee.
5. Train the collaborators and the Management and Human Development person in charge of these issues, who will investigate and resolve complaints about sexual harassment in a specialized way. This action is carried out at least on an annual basis and emphasizes the adequate treatment of victims, the development of the procedure, and the approaches that should guide the process.
6. Periodically evaluate this Policy's development, operation, and effectiveness.

V. DEFINITIONS

5.1. Sexual Harassment

Any conduct of a sexual or sexist nature or connotation unwanted by the person against whom it is directed may create an intimidating, hostile or humiliating environment or affect the activity or employment situation at Interbank.

For a case of sexual harassment to be configured, it is not necessary to prove the rejection or repetition of the conduct.

Anyone can be a victim or harasser, regardless of age, position, sex, gender, sexual orientation, gender identity, or other factors.

Sexual harassment is configured regardless of degrees of hierarchy between the harassed person and the harasser, or if the act of sexual harassment occurs during or outside the working day or workplace.

5.2. Conduct of a sexual nature

Physical, verbal, gestural, or other sexual behaviors or acts, such as comments and insinuations; lewd observations or looks; exhibition or exhibition of pornographic material; touching, rubbing, or body approaches; sexual demands or propositions; virtual contact; among others, of a similar nature.

5.3. Sexist behavior

Behaviors or acts that promote or reinforce stereotypes in which women and men have attributes, roles, or spaces of their own, implying the subordination of one sex or gender concerning the other.

5.4. Manifestations of sexual harassment

Sexual harassment can manifest through the following behaviors, among others:

- a) Implicit or express promises to the victim of preferential or beneficial treatment concerning their current or future situation (employment or professional) in exchange for sexual favors.
- b) Threats by which unwanted conduct by the victim is implicitly or explicitly demanded, which threatens or aggravates his dignity.
- c) Use of terms of a sexual or sexist nature or connotation (written or verbal), sexual suggestions, sexual propositions, obscene gestures, or display through images of sexual content, which are unbearable, hostile, humiliating, or offensive to the victim.
- d) Body approaches, rubbing, touching, or other physical behaviors of a sexual nature that are offensive and unwanted by the victim.
- e) Offensive or aggressive treatment for rejecting the behaviors indicated in this section.
- f) Any other conduct that fits the definition regulated in article 4 of Law No. 27942, "Law on the Prevention and Punishment of Sexual Harassment"

The actions through which sexual harassment materializes may be behaviors or behaviors of the following nature:

- a) Physical, such as unwanted physical contact, including patting, pinching, caressing, kissing, hugging, or inappropriate contact (such as cornering); physical violence, including sexual assault; work-related threats or rewards to solicit sexual favors or services.
- b) Verbal, such as comments about the person's physical appearance, age, private life, etc.; sexual or sexist comments, obscene stories, and jokes; sexual suggestions; repeated and unwanted social invitations; insults based on the victim's sex, sexual orientation, or gender identity, etc.
- c) Non-verbal, the ones that can be presented in virtual and non-virtual media, are referred to as the exhibition of sexually explicit or suggestive material; sexually explicit or suggestive messages (via email, phone, social networks, WhatsApp, etc.); lewd looks with sexual content, etc.

VI. INVESTIGATION PROCEDURE

The internal investigation procedure activated by Interbank in response to a complaint of sexual harassment shall be carried out in a reserved, confidential, impartial, prompt, and effective manner, respecting the rights of defense of the parties and guaranteeing the victim's protection.

6.1. Related to the complaint

- a) The procedure for investigating and punishing sexual harassment is initiated at the victim's request, a third party, or ex officio when Interbank becomes aware of the facts that allegedly constitute sexual harassment.

- b) The complaint can be submitted verbally, written, or electronically. If the complainant is the victim, Interbank reads the "Complainant Rights Act," which identifies the rights that assist the victim during the procedure. The victim will sign the act to record having been informed of the rights that help the victim or; the victim may send an email indicating that he or she has read the "Act of rights of the complainant" and that he or she has been informed of its rights.

Likewise, if the complaint is verbal, it must be formalized by signing a record of the behaviors that gave rise to the sexual harassment. In both cases, the person making the complaint must describe in a precise and detailed manner the facts that gave rise to the sexual harassment, identify the alleged harasser and those who could have witnessed the occurrence of the harassment, and provide any other means of proof or indication, if there had been.

Any conduct of the proceedings must be documented in writing or other means to which the parties may have access. Likewise, all communication with the victim will be carried out only through formally established channels.

- c) The complaint channels are the Submanager of Culture and Development, Paola Vera, whose email is pvera@intercorp.com.pe, and the Ethical Channel through email: reportes@Interbankcanaletico.com.

Suppose the alleged harasser happens to be the Submanager of Culture and Development. In that case, the complaint must be filed with the immediate superior, the Manager of the Human Development Division, whose email is JDeIValle@intercorp.com.pe. In this case, the Submanager of Culture and Development must refrain from participating in the investigation.

- d) Interbank agrees to keep the identity of the victim and the complainant duly reserved to people outside the procedure. The name of witnesses must also be kept confidential if requested.

6.2. **Medical or psychological care**

Within a period not exceeding one (1) business day from the complaint filing, the Submanagement of Culture and Development will make available to the victim the channels of medical, physical, and mental or psychological care with which it counts. If these services are not available, it refers the victim to those public or private health services to which the victim can go. This offer of medical and psychological care must appear within the act of reading the rights of the complainants.

In case of accepting or renouncing the services made available to him or her, the victim states it with his signature and fingerprint on the document, being able to use both physical and virtual formats.

The report issued due to medical, physical, and mental or psychological care is incorporated into the procedure and considered evidentiary means only if the victim authorizes it.

6.3. **Protective dispositions**

Within a period not exceeding three (3) business days from the date the complaint was filed, the Sub-management of Culture and Development, ex officio or at the complainant's request, dictates the protection dispositions. These are carried out immediately to protect the victim's rights and prevent further acts of violence. Considering the victim's situation, the protection dispositions must be adjusted to each case's reasonableness, proportionality, and necessity. They may be, among others, the following:

- Rotation or change of place of the alleged harasser.
- Rotation or change the victim's position if he or she has requested it.
- Request the competent body to issue an order of approach impediment, proximity to the victim or his or her family environment or initiate some communication with the victim.
- Other dispositions seek to protect and ensure the victim's well-being.

The Sub-Management of Culture and Development may also issue specific protection dispositions in favor of witnesses if strictly necessary to guarantee their collaboration with the investigation.

At the request of a party, the protection dispositions may be replaced or extended, considering the circumstances of each case, with due justification and taking care that the decision is reasonable, proportionate, and beneficial to the victim.

The protective dispositions remain in force until the procedure for investigating and punishing sexual harassment is issued. Then, without prejudice, the body in charge of sanctioning may establish temporary dispositions in favor of the victim to guarantee their well-being.

6.4. **Communication to the Ministry of Labor and Employment Promotion**

Interbank informs the Ministry of Labor and Employment Promotion that it has received a complaint or has initiated an investigation of sexual harassment and informs it about the protection measures granted to the alleged victim within a period not exceeding six (6) working days of receipt of the complaint.

Likewise, once the procedure has been completed, Interbank will communicate the final decision adopted to the Ministry of Labor and Employment Promotion within six (6) working days following its issuance.

6.5. **The Sexual Harassment Intervention Committee**

- a) The Committee on Intervention against Sexual Harassment (from now on referred to as *the Committee*) is responsible for carrying out the investigation and proposing sanctions and complementary dispositions to prevent new cases of harassment.
- b) The Committee is composed of four (4) members: two (2) representatives of the collaborators and two (2) representatives of the employer, at least one of them being from the Division of Management and Human Development, guaranteeing gender parity in both cases.
- c) The Committee shall appoint an interlocutor with whom the victim shall deal directly if he or she so considers.

- d) The Committee members shall be responsible for maintaining the investigation procedure under strict confidentiality to guarantee the victim's right to dignity, integrity, and security. Confidentiality should also be held concerning the alleged harasser. In this sense, the Committee must inform and commit all the persons participating in the procedure about the duty to maintain confidentiality and secrecy about their intervention and the information they had access to. Interbank's Internal Working Regulations will sanction failure to comply with the responsibility of privacy.
- e) A simple majority adopts the Committee's decisions. The direct vote corresponds to /the representative of the Division of Management and Human Development.

6.6. **Stages and deadlines**

- a) Within a period not exceeding one (1) business day, the Sub-Management of Culture and Development will transfer the complaint to the Committee to start the investigation and make available to the victim the channels of medical, physical, and mental or psychological attention, with which it has.

Likewise, within a period not exceeding three (3) working days of receiving the complaint, the Culture and Development Sub-Management dictates and executes the protection dispositions previously indicated or others that it considers suitable to protect the alleged victim.

- b) Once the complaint is received, the Intervention Committee has a maximum period of 15 calendar days to:
 - Transfer the complaint to the denounced person granting him three (3) calendar days to formulate his disclaimers. The defendant's discharge must be brought to the victim's attention within one (1) calendar day following the date on which the Committee received it.
 - Carry out as many proceedings, evidence, and actions as it deems appropriate and necessary to clarify the facts, giving a hearing to all parties, witnesses, and other persons who can provide relevant information.
 - Issue a report containing: (i) the description of the facts, (ii) the assessment of the presented evidence, (iii) the duly motivated sanction or filing proposal, and (iv) the recommendation of additional dispositions to prevent further harassment. The report must be brought to the attention of Interbank's Resolution Committee within a maximum period of one (1) business day.
- c) Once the investigation stage has been completed and the report issued by the Committee has been received, Interbank's Resolution Committee has a maximum period of 10 calendar days to:
 - Transfer the Committee's report to the denounced person and the alleged harassed and grant them three (3) calendar days to present their allegations if deemed appropriate.
 - Issue a decision containing, if applicable, the sanction to be applied and other dispositions to prevent new cases of sexual harassment.

6.7. **Assessment of evidence**

The Committee will assess the evidence provided and obtained during the investigations to determine the existence or configuration of sexual harassment or harassment reported by the complainant.

The means of proof that may be provided to the investigations are, among others:

- Witness statements.
- Public or private documents.
- Recordings, emails, letters, text messages, photographs, and conversations on social networks.
- Psychological, psychiatric, graph technical expertise, among others.

The action of the evidentiary means cannot expose the alleged victim to situations of revictimization, such as the repetitive statement of the facts, confrontations, or questions about his or her conduct or personal life, and conflicts with the alleged harasser, among others. The members of the bodies involved in the procedure avoid any act that, directly or indirectly, dissuades the victim from filing a complaint or denunciation and from continuing with the process.

The witnesses offered by the parties will have personal and labor protection dispositions to avoid reprisals after finishing the investigation procedure.

Additionally, in the assessment of the complainant's statement, the Committee shall observe the following:

- a. The possibility that the sole statement of the complainant can rebut the presumption of innocence if there are no objective reasons that invalidate their arguments. To this end, the absence of subjective incredibility, the plausibility of the testimony, and the persistence in the incrimination are evaluated.
- b. The importance of the complainant's retraction being evaluated considering the work, family, and social environment from which the complainant and the person denounced.
- c. The criteria established in the Plenary Agreements approved by the Supreme Court of Justice of the Republic. (Plenary Agreement 2-2005/CJ-116 and later).

6.8. **Completion of the procedure**

At Interbank, we have a zero-tolerance policy against sexual harassment at work. This means that, if it is concluded, after the corresponding legal investigation, that there is a conduct of sexual harassment at work, it will be sanctioned according to the gravity of the facts and what is established by current labor legislation.

If the complaint is declared well-founded, the final resolution will indicate the sanction imposed on the denounced collaborator using reasonable criteria and proportional to the seriousness of the fault.

The sanctions may consist, by the Internal Labor Regulations, of:

- Verbal warning.
- Warning.
- Severe warning.
- Suspension without payment.
- Firing.

A disposition that favors the harasser occupationally cannot be applied as a sanction, nor can the previously imposed protection measure be considered a sanction.

If necessary, disciplinary measures may be accompanied by other actions of labor conditioning, such as transfer of work center or reassignment of position or functions, along with close accompaniment to avoid the repetition of these behaviors.

Suppose it cannot be determined from the investigations that the sexual harassment took place. In that case, the Resolution Committee may establish follow-up guidelines to ensure a safe and respectful work environment.

In cases where the complaint is declared unfounded, the collaborator to whom the facts were imputed will have the right to file the relevant actions judicially.

The Resolution Committee may recommend the termination of the employment contract with the complainant if there is a final judgment declaring the complaint or demand for sexual harassment unfounded.

6.9. Exception to the Procedure

If the harasser is the employer, management personnel, trusted personnel, owner, associate, director, or shareholder, the victim may choose between triggering the cessation of hostility or the payment of compensation, terminating the employment contract by Article 35 of the Single Ordered Text of Legislative Decree No. 728, Law on Productivity and Labor Competitiveness (“Ley de Productividad y Competitividad Laboral”), approved by Supreme Decree No. 003-97-TR (LPCL). In the latter case, communication with the employer is not required for cessation of hostility referred to in article 30 of the same rule. The use of the mechanisms does not exclude the possibility that the victim directly claims the damages suffered because of sexual harassment or requests the action of the competent Labor Inspection Authority.

6.10. Cases of resignation or termination of the contractual relationship

The resignation, cessation, or termination of the contractual relationship of the alleged victim with Interbank does not exempt him or her from initiating or continuing with the procedure until its completion and, if applicable, applying the corresponding sanction.

Likewise, if the accused ceases to belong to Interbank during the procedure or as a result, the system will continue and issue the corresponding measures.

VII. CASES OF SEXUAL HARASSMENT INVOLVING OUTSOURCING OR SERVICE INTERMEDIATION COMPANIES

- 7.1. Case in which the alleged harasser works for a company of intermediation or outsourcing of services and the alleged victim is part of Interbank.

When the alleged harasser works for a service intermediation or outsourcing company and the alleged victim is part of Interbank, the complaint is made to Interbank, which, within a period not exceeding one (1) business day of receipt of the complaint or of knowing the facts, informs about the complaint or complaint to the intermediation or outsourcing company of services to take the measures it deems appropriate.

Interbank carries out the investigation procedure through its Committee for Intervention against Sexual Harassment, which issues the report containing the following: (i) the description of the facts, (ii) the evaluation of the means of the presented evidence, (iii) the sanction or filing duly motivated proposal; and (iv) the recommendation of additional dispositions to avoid new cases of harassment. It also rules on protective measures.

When the final report of the Interbank's Sexual Harassment Intervention Committee includes recommendations for sanctions and additional suggestions to prevent new cases of harassment, it is transferred to the Interbank Resolution Committee and the intermediation or outsourcing company so that:

- Forward the Committee's report to the defendant by giving him or her a period to present allegations.
- Issue a decision containing, if applicable, the sanction to be applied and other measures to prevent new cases of sexual harassment.

- 7.2. Case in which the alleged victim of sexual harassment works for a company of intermediation or outsourcing of services and the alleged harasser is part of Interbank.

When the alleged victim of sexual harassment works for a company of intermediation or outsourcing of services and the alleged harasser is part of Interbank, the complaint is filed with Interbank, which, within a period not exceeding one (1) business day of receipt of the complaint or of knowing the facts, Interbank informs about the complaint to the company of intermediation or outsourcing of services to take dispositions that it considers relevant.

Interbank carries out the investigation and sanction procedure by the provisions of section VI of these Regulations, ensuring that the victim can report or file a complaint against the acts of sexual harassment that he or she has suffered.

- 7.3. Case in which the alleged harasser and the alleged victim work for an outsourcing or intermediation company.

When the alleged harasser and the alleged victim work for an outsourcing or intermediation company, and the act of sexual harassment has occurred within the scope of control or on the service they provide to Interbank, the alleged victim may file the complaint with the company of outsourcing or intermediation of services or with Interbank. In the latter case, Interbank transfers the complaint or denunciation to the company to which the alleged harasser belongs within a period not exceeding one (1) business day of receipt.

The outsourcing or intermediation company carries out the investigation and sanction procedure without prejudice to the corresponding coordination with Interbank.

The investigation procedure does not imply recognizing the employment relationship of the complainant or the complainant with Interbank.