

Sexual Harassment Prevention and Punishment Policy

Legal Management

1. Objective

- The purpose of this Policy is to prevent, correct and pursue penalizing the various expressions of sexual harassment. This is to be fulfilled in accordance with the provisions y Law N° 27942, the Sexual Harassment Prevention and Punishment Law and its Regulations, approved by Supreme Decree N° 014-2019-MIMP, as amended.

2. Scope

- This Policy applies to all who provide services to INTELIGO SOCIEDAD AGENTE DE BOLSA S.A., hereinafter, "INTELIGO SAB" (direct collaborators, interns, youths in occupational training, etc.). Furthermore, in accordance with applicable laws and regulations, and as appropriate, some provisions hereof shall also apply when any of the parties involved in a case of sexual harassment in the workplace provides services to a contractor or labor intermediation firm.

3. Responsibilities

- For the effective fulfillment of the commitment taken on by INTELIGO SAB, and to accomplish the objective of this Policy, INTELIGO SAB requires that any and all of its collaborators and, especially, those in leadership positions, take on the following responsibilities:
 1. Treat all persons with whom they establish work-related relationships (collaborators, vendors, clients, contractor firm personnel, etc.) with respect for their dignity and fundamental rights.
 2. Avoid behaviors, attitudes or actions of sexual or sexist connotation which may be offensive, humiliating, demeaning, annoying, intimidating or hostile.
 3. Act properly vis-à-vis behaviors, attitudes or actions which constitute sexual harassment by not tolerating them, expressing disagreement therewith, preventing them from being repeated or compounded and communicating them to the authorities designated in this Policy.
- On its part, INTELIGO SAB is responsible for putting in place the following measures to prevent, respond to and punish sexual harassment:
 1. Take formative actions in connection with the prevention of sexual harassment.
 2. Disseminate the contents of this Policy among all collaborators, placing special emphasis on making known the reporting channels in place for such purpose.
 3. Have Sexual Harassment Intervention Committee in place.
 4. Train the collaborators who will investigate and settle sexual harassment reports.
 5. Assess the development, functioning and effectiveness of this Policy from time to time.

4. Definitions

4.1 Sexual Harassment

Any conduct of a sexual or sexist nature or connotation unwanted by the person against whom it is intended, which may create an intimidating, hostile or humiliating environment or affect the activity or employment status of such person.

Demonstrating that the conduct was rejected or that it was repeatedly performed is not a requirement for a case of sexual harassment to be deemed to have occurred.

Any person can be a sexual harassment victim and/or perpetrator, regardless of age, sex, gender, sexual orientation, gender identity or any other factor.

Sexual harassment occurs regardless of any hierarchy degrees between the harassed and the harasser or whether the sexual harassment act occurs during or off working hours or in or outside the workplace.

4.2 Conduct of a Sexual Nature

Physical, verbal, gestural or other behaviors or acts with a sexual connotation, such as comments or innuendoes; lewd comments or leering; exhibiting or exposing pornographic material; bodily touching, rubbing or standing too close; sexual demands or proposals; virtual contact; among others of similar nature.

4.3 Sexist Conduct

Behaviors or acts which promote or reinforce stereotypes in which women and men have attributes, roles or spaces attached to them, which entail subordination of a sex or gender with respect to another.

4.4 Manifestations

Sexual harassment may manifest itself by the following behaviors, among others:

- a) Implicit or express promises to the victim of preferential or beneficial treatment with respect to his or her current or future (work or professional) situation in exchange for sexual favors.
- b) Threats implicitly or explicitly demanding unwanted conduct from the victim that violates or offends their dignity.
- c) Use of terms and comments of a sexual or sexist nature or connotation (written or verbal), sexual innuendoes, sexual propositions, obscene gestures or exhibition through any means of images of sexual content, which are unbearable, hostile, humiliating or offensive to the victim.
- d) Bodily approaches, rubbing, touching or other physical conduct of a sexual nature that is offensive and unwanted by the victim.
- e) Offensive or hostile treatment due to the rejection of the behavior indicated in this section.
- f) Any other conduct that fits the definition regulated in Article 4 of Law N° 27942, "Sexual Harassment Prevention and Punishment Law".

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

- a) Physical, such as unwanted physical contact, including patting, pinching, fondling, kissing, hugging, or inappropriate contact (such as pinning down); physical violence, including sexual assault; the use of threats or work-related 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/or jokes; sexual advances; repeated and unwanted social invitations; insults based on the victim's sex or sexual orientation, etc.
- c) Non-verbal, which can occur in both virtual and non-virtual media, and refer to the display of sexually explicit or suggestive material; sexually explicit or suggestive messages (via email, telephone, social media, WhatsApp, etc.); leering with a sexual interest, etc.

5. Investigation Procedure

The internal investigation procedure activated by INTELIGO SAB in response to a complaint of sexual harassment shall be conducted in a reserved, confidential, impartial and effective manner, respecting the right of defense of the parties and ensuring the protection of the victim.

5.1 Filing the Complaint

- a) The procedure for investigation and punishment of sexual harassment starts at the request of the victim or a third party, or ex officio, when INTELIGO SAB becomes apprised by any means of the facts that allegedly constitute sexual harassment.

As INTELIGO SAB is under the obligation of start an investigation ex officio whenever it becomes apprised of an alleged case of sexual harassment, anonymous complaints received through any of the channels provided for such purpose shall also be investigated. Notwithstanding the foregoing, identifying the complainant is encouraged to facilitate the investigation stage, ensuring the confidentiality of the alleged victim and of the complainant, if other than the victim.

- b) The complaint may be filed verbally or in writing. If filed verbally, it should be formalized by execution of a form in which the behaviors that brought about sexual harassment are recorded. In both cases, the person filing the complaint shall describe the facts that brought about sexual harassment in an accurate and detailed manner, identifying those who may have witnessed its occurrence and providing any other means of proof or evidence.
- c) The reporting channels are: In-person or in writing to the Management and Human Development Manager of INTELIGO SAB, or, otherwise, of Inteligo Perú Holdings S.A.C., or of the firm from which INTELIGO SAB has outsourced the management and human development (hereinafter, "MHD") service in the future.

In the event that the alleged harasser is the head of the body or person receiving the complaint, the complaint shall be filed with the immediate superior of the alleged harasser, i.e., the General Manager. The alleged harasser shall not participate in the investigation.

5.2 Medical Care

Within one (1) business day as from filing of the complaint, MHD shall make available to the victim the channels of medical, physical and mental or psychological care available to her/him. If such services are not available, the victim will be referred to any public or private health services available to the victim.

The report issued as a result of the medical, physical and mental or psychological care is incorporated into the procedure and considered as evidence only if so authorized by the victim.

5.3 Protection Measures

Within three (2) business days as from filing of the complaint, MHD may issue and implement precautionary measures, whether ex officio or at the request of the complainant, and, in order to ensure the effectiveness of the final decision, issue and implement precautionary measures, which must be adjusted to the intensity, proportionality and necessity of each case, which measures may include, without limitation, the following:

- Rotating or changing the alleged harasser from its current position.
- Imperfect temporary suspension of the alleged harasser. In this case, the remuneration granted during the suspension period may be deducted if the misconduct has occurred.
- Rotating or changing the victim from its current position, provided it has been requested by the victim.
- Request the competent body for the issuance of a restraining order to prevent approaching or proximity to the victim, or to establish any type of communication with the victim.
- Other measures that seek to protect and ensure the welfare of the victim.

MHD may also issue certain witness protection measures, provided these are strictly required to ensure their collaboration in the investigation.

5.4 Communication to the Ministry of Labor and the Promotion of Employment

INTELIGO SAB communicates to the Ministry of Labor and the Promotion of Employment that it has received a sexual harassment complaint or that an investigation has been started ex officio in this connection and informs of the protection measures afforded to the alleged victim, within six (6) business days as from receipt of the complaint.

Furthermore, upon completion of the procedure, INTELIGO SAB shall communicate to the Ministry of Labor and the Promotion of Employment of the final decision it has made within six (6) business days as from issuance thereof.

5.5 Sexual Harassment Intervention Committee

- a) The Sexual Harassment Intervention Committee (hereinafter, the "Committee") is in charge of developing the investigation and proposing penalizing measures and other measures to prevent new cases of harassment.
- b) The Committee shall consist of four (4) members, two (2) representing the employees and two (2) representing the the employer, ensuring gender parity in both cases.
- c) The Committee shall appoint an intermediary with whom the victim shall deal directly, if he/she so desires.
- d) Members of the Committee shall be responsible for keeping the investigation procedure under strict confidential reserve to ensure the right to privacy, not only of the victim but of the person subject of the complaint. In this connection, they shall inform and engage all persons involved in the procedure with the duty of confidentiality and secrecy of their intervention and the information which was made available to them in this connection. Breach of the duty of confidentiality shall be penalized.
- e) Resolutions of the Committee shall be passed by simple majority. The casting vote shall be by the MHD representative.

5.6 Stages and Deadlines

- a) Within one (1) business day, MHD shall notify the Committee to start the investigation and make the medical, physical, and mental or psychological care channels that MHD has in place available to the victim.

Furthermore, within three (3) business days as from receipt of the complaint, MHD shall issue and implement the aforementioned protection measures and such other measures as it may deem appropriate to protect the alleged victim.

- b) Upon receipt of the complaint, the Intervention Committee shall have 15 calendar days to:
 - Notify the complaint to the accused person granting him/her three (3) business days to state its defense claims. The defense claims of the accused shall be made known to the victim within two (2) business days as from receipt thereof by the Committee.
 - Conduct all such proceedings, gather all means of proof and perform all such and actions as it may deem convenient and necessary to elucidate the reported facts, hearing all parties, witnesses and others who may provide relevant information.

- Issue a report containing: (i) a description of the facts; (ii) the appraisal of the means of proof submitted; (iii) the proposal for punishment or dismissal of the case; and (iv) the recommended additional measures to prevent new cases of harassment. MHD shall be given notice of the report within one (1) business day.
- c) Upon completion of the investigation stage and receipt of the report to be issued by the Committee, MHD shall have a maximum of 10 calendar days to:
 - Forward the report of the Committee to the accused and to the alleged harassed and grant them a term to file their pleas, if deemed appropriate.
 - Issue a decision containing, if applicable, the penalty to be imposed, and other measures to prevent new cases of sexual harassment.

5.7 Appraisal of means of proof

The Committee shall assess the means of proof and evidence indications provided during the investigations to determine the existence or occurrence of the sexual harassment claimed by the complainant.

Means of proof provided at the investigations may include, without limitation:

- Witness statements.
- Public or private documents.
- Recordings, e-mails, letters, text messages, photographs, social media chats, among others.
- Psychological, psychiatric, handwriting expert reports, among others
- Any other means of proof as may be appropriate, including the confrontation between the parties, which may be requested by the victim.

The witnesses presented by the parties shall be provided personal and workplace protection measures to prevent retaliation upon completion of the investigation procedure.

5.8 Closing of the Procedure

If the complaint is ruled well-founded, the final decision shall state the penalty to be imposed to the accused collaborator using certain criteria which are both reasonable and proportional with the seriousness of the misconduct

Penalties may include:

- Verbal or written (severe) admonition.
- Suspension without pay.
- Dismissal.

Admonitions and suspensions may be accompanied by other workplace conditioning measures such as moving the workplace or reassigning of positions or functions, together with close follow-up to prevent these conducts from being repeated.

If sexual harassment cannot be determined to have occurred by the investigations conducted, MHD may set follow-up guidelines which allow ensuring a safe and respectful work environment.

In cases where the complaint is ruled unfounded, the collaborator against whom it was filed shall be entitled to bring the pertaining legal actions.

On its part, MHD may recommend termination of the employment contract of the complainant, provided the sexual harassment report or complaint was ruled unfounded by a binding judgment.

5.9 Exception from the procedure

In the event that the harasser is an employer, management personnel, key personnel, associate, director or shareholder, the victim may elect between an action for the hostility to cease or payment of a compensation, terminating the employment contract as provided in Article 35 of the Consolidated Text (Texto Único Ordenado) of Legislative Decree N° 728, the Law on Labor Productivity and Competitiveness (Ley de Productividad y Competitividad Laboral), approved by Supreme Decree N° 003- 97-TR (LPCL). In this event, communication to the employer for the ceasing of hostility referred to in Article 30 of the aforementioned Law is not enforceable. Using the mechanisms indicated does not preclude the possibility of the victim claiming indemnification for damages resulting from the sexual harassment directly and requesting the intervention of the competent Labor Inspection Authority.

5.10 Cases of resignation or termination of contractual relationship

Resignation, dismissal or termination of employment of the alleged victim with INTELIGO SAB shall not exempt it from pursuing or continuing with the procedure until completion thereof and, if applicable, impose the pertaining penalty.

Furthermore, if during the procedure, or if as a result thereof, the accused resigns, ceases to work at INTELIGO SAB or terminates its employment relationship, the procedure shall continue, and the appropriate measures will be issued nevertheless.

6. Cases of sexual harassment involving services outsourcing or intermediation and firms

6.1 In the event that the alleged harasser works for a services intermediation or outsourcing firm and the alleged victim works for INTELIGO SAB

When the alleged harasser works for a services intermediation or outsourcing firm and the alleged victim works for INTELIGO SAB, the complaint is filed with INTELIGO SAB, which shall give notice of the complaint

to the services intermediation or outsourcing firm within one (1) business day as from receipt of the complaint or of becoming apprised of the facts, for the services firm to take such measures as it may deem appropriate.

INTELIGO SAB conducts the investigation procedure through its Sexual Harassment Intervention Committee, which issues a report containing: (i) a description of the facts; (ii) the appraisal of the means of proof submitted; (iii) the proposal for punishment or dismissal of the case; and (iv) the recommended additional measures to prevent new cases of harassment. Furthermore, the Committee issues a decision on the protection measures.

When the final report of the Sexual Harassment Intervention Committee of INTELIGO SAB includes recommendations on penalties and other additional recommendations, the report is submitted to the services intermediation or outsourcing firm for it to:

- Forward the report of the Committee to the accused and to the alleged harassed and grant them a term to file their pleas, if deemed appropriate.
- Issue a decision containing, if applicable, the penalty to be imposed, and other measures to prevent new cases of sexual harassment.

6.2 In the event that the alleged harasser

When the alleged harasser and the alleged victim of sexual harassment work for a services outsourcing or intermediation firm works for a services intermediation or outsourcing firm, and the sexual harassment act has occurred within the scope of control of or in connection with the service rendered to INTELIGO SAB, the alleged victim may file the complaint with the the services outsourcing or intermediation firm or with INTELIGO SAB. In the last case, INTELIGO SAB shall notify the complaint to the firm where the alleged harasser works within one (1) business day as from receipt thereof.

The services outsourcing or intermediation firm is in charge of the investigation and penalizing procedure, without prejudice to making the pertaining arrangements with INTELIGO SAB.

The investigation procedure shall not be deemed as an acknowledgement of the employment relationship of the accused or of the complainant with INTELIGO SAB.

7. INTELIGO SAB promotes a working environment free of sexual harassment

INTELIGO SAB seeks to provide working environments that are safe and free of gender violence. This is why, at INTELIGO SAB we have a zero-tolerance policy towards sexual harassment and promote work spaces in which the individual differences of our collaborators are respected and valued.