



POLICY OF PREVENTION AND SANCTION OF VIOLENCE AND DISCRIMINATION

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1. OBJECTIVE

This document seeks to adopt measures to prevent and sanction violence in all its forms: harassment, bullying and discrimination in all its forms for all Interseguro employees.

2. SCOPE

This policy applies to all individuals who have an employment relationship with Interseguro, as well as to any natural individual or legal entity that interacts, provides or receives services inside and outside our facilities.

3. LEGAL BASIS

- Act No. 27942, Act on Prevention and Sanction of Sexual Harassment.
- Act No. 29430, Act that amends Act No. 2794, Act on Prevention and Sanction of Sexual Harassment.
- Legislative Decree that incorporates the Crime of Harassment, Sexual Harassment, Sexual Blackmail and Dissemination of Images, Audiovisual Materials or Audios with sexual content into the criminal code, and Amends the procedure for the Sanction of Sexual Harassment, Legislative Decree No. 1410.
- Regulations of Act No. 27942, Act on Prevention and Sanction of Harassment, Supreme Decree No. 010- 2003-MIMDES.
- Ministerial Resolution No. 222-2019-TR - Guidelines of the orientation and accompaniment service for cases of sexual harassment at the workplace.
- Ministerial Resolution No. 223-2019-TR - Practical Guide for the Prevention and Sanction of Sexual Harassment at the workplace in private and public sectors.
- Political Constitution of Peru.
- Interseguro Internal Labor Regulations.
- Interseguro Code of Ethics.
- Act No. 30364, Act to Prevent, Sanction and Eradicate Violence against Women and Family Members.

4. DEFINITIONS

4.1 Discrimination: Any action of distinction, exclusion, restriction or preference carried out by a individual or by third parties that incite or promote the annulment or impairment of recognition, enjoyment or exercise of any right of an individual or group of individuals based on and/or argued on the basis of any of the areas mentioned in point 5 of Interseguro's Diversity and Inclusion Policy.

4.2 Harassment: Form of violence that occurs through continuous or usual behavior of intimidation, pursuit, stalking, bullying or forced attempts to establish contact or closeness with a individual without consent, as well as exercising some type of mistreatment through any verbal, physical and/or virtual means, affecting the dignity of individuals and that may alter the normal development of her daily life.

4.2.1 Virtual Harassment: Action or conduct carried out by an individual or a group of individuals to threaten, embarrass, intimidate or criticize, with or without sexual connotation, by digital means of communication, an individual who rejects these actions for considering that they affect or violate her right to dignity, integrity, health or the right to a life free of violence. It can be shown in the following ways:

- Offensive messages with or without sexual connotation in social media or messaging applications.
- Impersonation by making use of the victim's online account access for personal purposes.
- Electronic insults to another individual that may or may not have sexual connotation.
- Cyber pursuit/cyber threats, frequent sending of threatening messages, intimidation, humiliation and other content that may cause annoyance.
- Happy Slapping: Publication on social media of some physical aggression recorded with digital media.
- Sexual Extortion: Blackmail with images, audios, messages or videos of sexual connotation.
- Stalking: Obsessive pursuit of the individual with whom it is intended to establish personal contact against her will.

4.3 Bullying: Exercise of power over an individual, relationship of authority or actual subordination of the victim to the aggressor.

- *Bully (aggressor): Any individual who performs an act of bullying and can be reported.*
- *Bullied (victim): Any individual who is a victim of bullying and can report.*

4.4. Sexual Harassment: It results by a conduct of a sexual or sexist nature or connotation unwanted by the individual against whom it is directed. It can create an intimidating, hostile or humiliating environment resulting on impact on any activity. Likewise, in order to be sexual harassment, it is not necessary to prove that the conduct of the harasser is reiterated or that the rejection of the victim is express.

4.4.1 Manifestations of Sexual Harassment:

- Implicit or express promise to the victim of preferential or beneficial treatment with respect to her current or future situation in exchange for sexual favors.
- Threats by means of which an implicit or explicit demand is made for conduct undesired by the victim, which violates or offends dignity.
- Use of (written or verbal) terms of a sexual or sexist nature or connotation, sexual insinuations, sexual propositions, obscene gestures or exhibition through any means of images of sexual content, which are unbearable, hostile, humiliating or offensive to the victim.
- Bodily approaches, rubbing, touching or other physical conduct of a sexual nature that is offensive and unwanted by the victim.
- Offensive or hostile treatment due to the rejection of the behaviors previously mentioned.
- Other conducts that fit into the concept regulated in Act No. 27942 (subject to legal amendments).

4.5 Violence: Any action or conduct that intentionally causes harm, affects or violates the physical or psychological integrity of an individual. It may be shown in the following ways:

- *Physical Violence:* Action or conduct that causes harm to bodily integrity or health. It includes mistreatment due to negligence, carelessness or deprivation of basic needs, which have caused physical harm or may cause it, regardless of the time required for recovery.
- *Psychological Violence:* Action or conduct tending to control or isolate the individual against her will, to humiliate or embarrass him/her, and which may cause psychological damage.

- **Sexual Violence:** Actions of a sexual nature committed against an individual without her consent or under coercion. They include acts that do not involve penetration or physical contact; exposure to pornographic material; violation of the right of individuals to decide voluntarily about their sexual or reproductive life, through threats, coercion, use of force or intimidation.
- **Symbolic Violence:** Messages that convey and reproduce domination, inequality and discrimination in social relations, which also intersect with ethnicity, class and gender.

4.5.1 Gender-based Violence: Action or conduct that causes death, physical, sexual or psychological harm or suffering, whether in the public or private sphere, to a woman, based on her gender and/or status as a woman. In this respect, the following are considered violence: Physical violence, verbal violence, psychological violence, sexual harassment, cyberstalking, among others.

4.5.2 Homophobia, Biphobia and Transphobia: Acts of discrimination and violence in their different forms that are exercised against people of the LGBT+ community, mainly homosexual, bisexual and transsexual people.

4.6 Relationship of Authority: Any link existing between two individuals through which one of them has power of direction over the activities of the other, or has an advantageous situation with respect to the other.

4.7 Advantageous Situation: It occurs when in a relationship there is no position of authority attributed but there is a power of influence of one individual over the other, even when such individuals involved in an act of sexual harassment are of equal position, level or hierarchy.

4.8 Conduct of Sexual Nature: Physical, verbal, gestural or other behavior or acts of a sexual connotation, such as comments and insinuations; lustful glances or observations; exhibition or exposure of pornographic material; touching, rubbing or bodily approaches; sexual demands or propositions; virtual contact; among others of a similar nature.

4.9 Conduct of Sexist Nature: Behavior or acts that promote or reinforce stereotypes in which women and men have their own attributes, roles or spaces, which imply the subordination of one sex or gender with respect to the other.

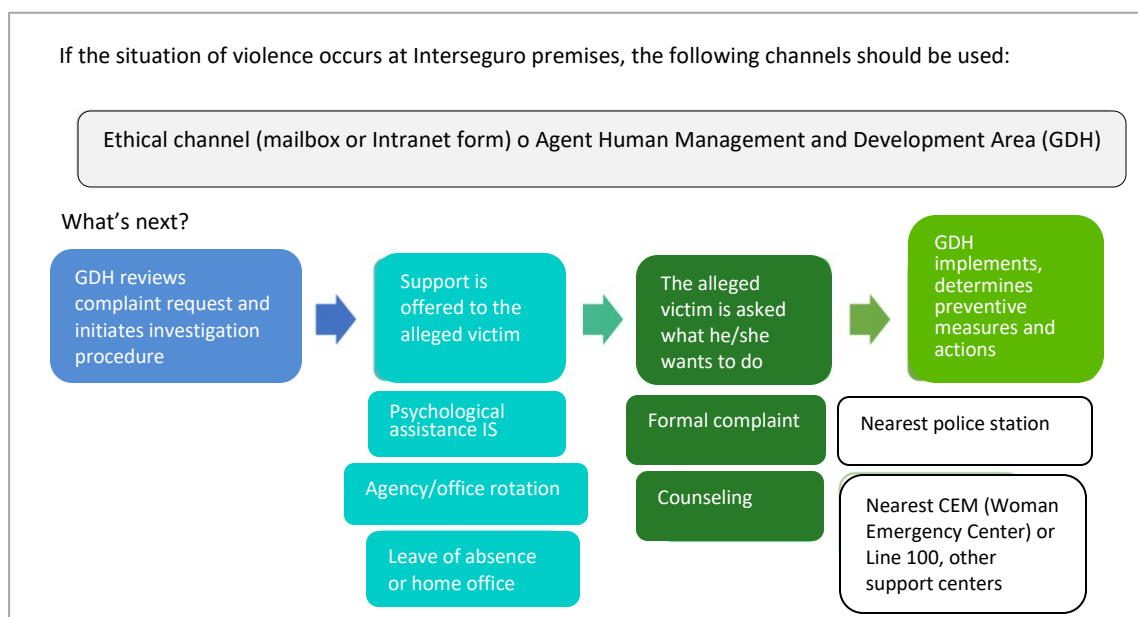
4.10 Vulnerable Groups: Groups of people who are at risk or disadvantaged. This group includes children, the elderly, people with disabilities or functional diversity and members of the LGBT+ community, among others.

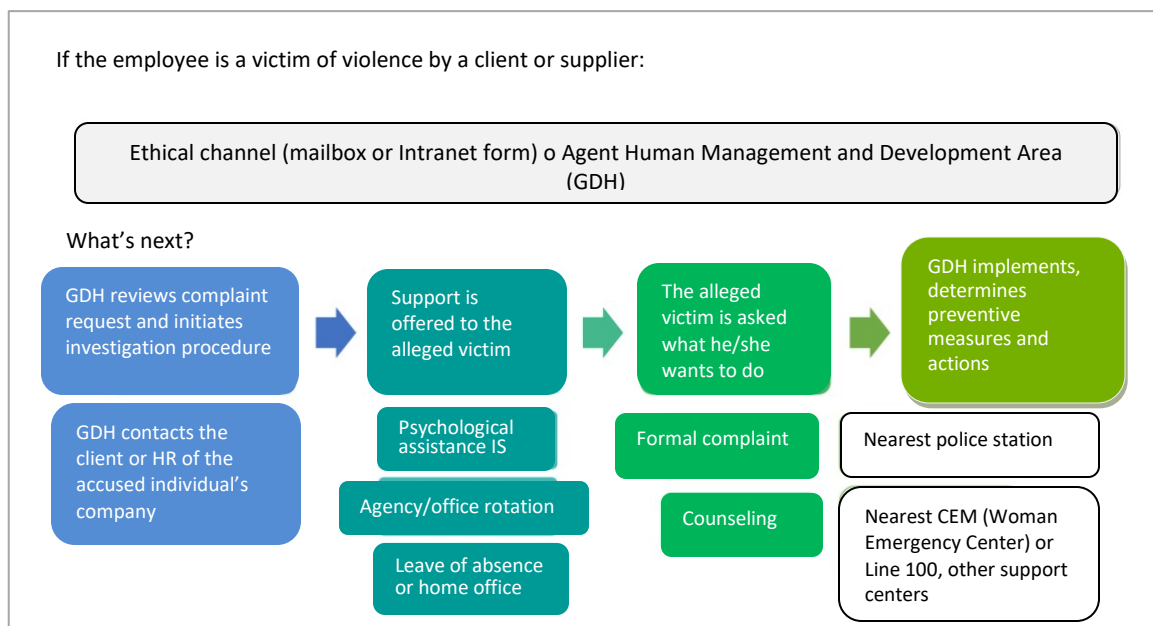
5. COMPLAINT PROCEDURE

The company will inform all individuals who have any kind of relationship with Interseguro about the guidelines set in this document through the defined channels. Any individual who witnesses, is a witness and/or has participated in or received information about any case, has the duty to report it. Complaint requests (claim, observation, etc.) received will be processed through the ethical channel or channeled through the Human Management and Development Area. This request must contain:

- Name, surname and position held by the individual accused.
- Description of the acts considered as grounds for the complaint, as well as the details of the act, such as circumstances, place, date and any other information considered relevant.
- Optional: Evidence to support the complaint (texts, images, videos, testimonies, among others).
- Optional: If you want to receive a reply regarding the complaint, you must provide the following information: Full name and e-mail address.

5.1 ACTION PROTOCOL





6. INVESTIGATION AND SANCTION OF SEXUAL HARASSMENT

Pursuant to the provisions of the Act and its Regulations, the employee may choose among the following alternatives:

6.1 Cessation of Hostility Procedure:

The individual allegedly sexually harassed may file a complaint in order to stop the sexual harassment conduct against him/her, taking into account the following:

- File your complaint in writing or verbally as indicated and through the channels indicated in the Code of Ethics, Complaint Procedure and/or member of the Human Management and Development Area.
- The complaints received will be reviewed by the Human Management and Development Area, and if any of its members is reported as an alleged harasser, the evaluation will be submitted to the direct report in said Management.
- The Human Management and Development Area will initiate the corresponding internal investigation process and must guide the victim to file the referred complaint, in case information is requested on the steps to follow in situations of sexual harassment. In no case may the victim be forced to file the complaint against the alleged harasser.
- The report issued as a result of medical, physical, mental or psychological care is incorporated into the procedure and considered evidence only if the victim authorizes it.

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- All investigation procedures will be documented in writing or through some other means to which the parties may have access. The alleged victim and alleged harasser will be kept confidential from individuals outside the procedure.
 - Resignation, cessation or termination of the contractual relationship of the alleged victim does not exempt him/her from initiating or continuing with the procedure until its completion and, if applicable, applying the corresponding sanction. Furthermore, if during the procedure or as a result thereof, the accused individual resigns, ceases to belong to the employing entity or terminates his contractual relationship with it, the procedure must continue and the corresponding measures must be ordered.

Evidence

In accordance with the principle of presumption of innocence, it is up to the victim of sexual harassment to prove what he/she claims in the complaint filed, to the point of creating a reasonable doubt in her favor in order to be admitted for processing. The evidence that may be brought to the investigation procedure may include the following:

- Witnesses' statements.
- Public or private documents.
- Recordings, e-mails, text messages, telephone messages, photographs, objects, recording tapes, among others.
- Psychological, psychiatric, forensic, graphotechnical; biological, chemical analyses, among others.
- The confrontation between the parties, provided it is requested by the alleged harassed.
- Any other suitable evidence.

Precautionary Measures

In order to ensure the effectiveness of the final Resolution and the protection of the victim, precautionary measures may be requested and/or ordered:

- Rotation of the alleged harasser from agency and/or workplace.
- Temporary suspension of the alleged harasser. In case of misconduct, the days of suspension may be deducted.
- Rotation of the victim, at the victim's request.
- Leave of absence for the victim, at the victim's request.
Impediment of the accused individual from approaching the victim or her family environment, or from engaging in any type of communication with the victim.
- Protective measures in favor of witnesses, provided that they are strictly necessary to

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- guarantee their collaboration with the investigation.
- Psychological assistance.

Sanctions

In case the existence of the sexual harassment act is determined, the sanctions applicable against the harasser may be the following, depending on the seriousness of the facts and as indicated in the Internal Labor Regulations:

- Written reprimand
- Suspension
- Dismissal

Payment of Compensation

The victim of harassment has the right to terminate the employment contract and request payment of compensation in accordance with Section 35 of the Labor Productivity and Competitiveness Act. This may occur in the following scenarios: If the harasser is an employer, management or trust personnel, owner, associate, director or shareholder; or if the employer or competent authority fails to initiate the investigation of the case of sexual harassment or to adopt the corresponding protection, prevention and sanction measures.

Expiry Term

The term to file a complaint for cessation of hostility or payment of compensation for arbitrary dismissal is thirty (30) calendar days from the day following the last act of harassment or evidence thereof.

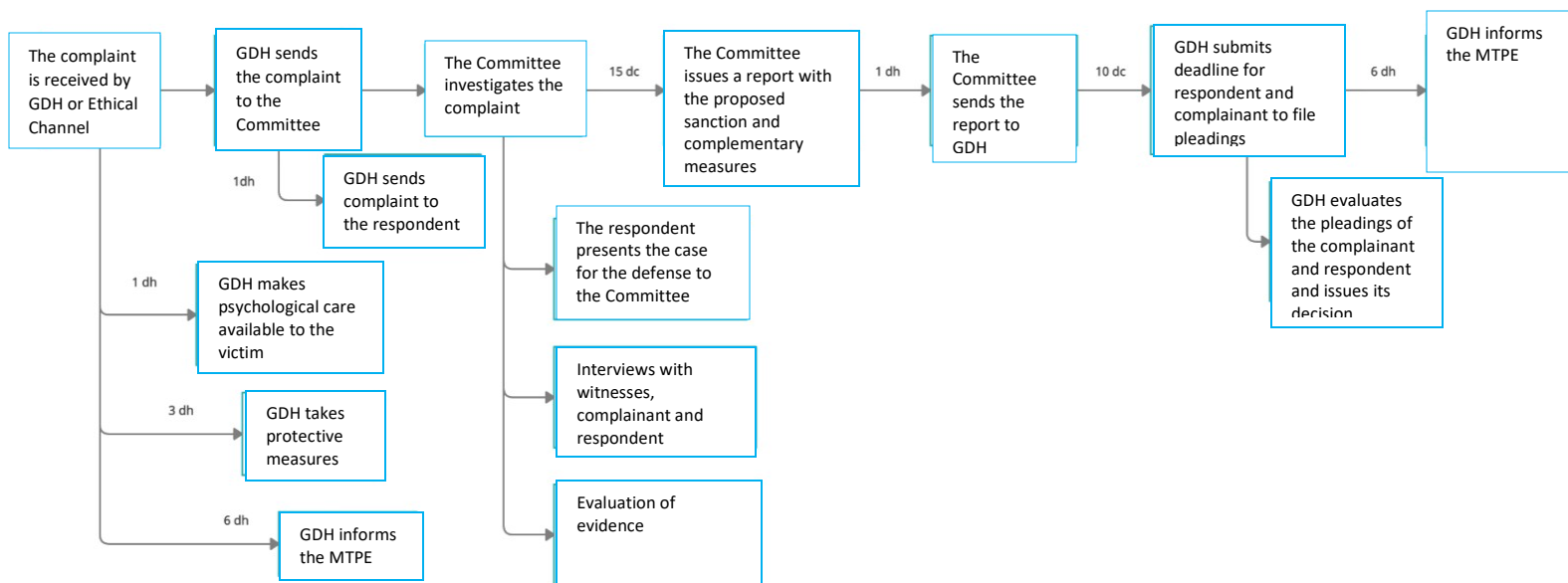
Effects of False Complaint

When the complaint of sexual harassment is declared unfounded by the Final Resolution, the alleged harasser has the right to take legal action against the alleged victim of harassment, who will be obliged to pay the compensation set by the respective judge. At the same time, an internal investigation will be conducted to determine whether it was a mistake or a complaint was filed with the intention of affecting the accused.

6.2 STAGES AND TERMS OF INVESTIGATION

- Within a period not exceeding one (1) business day, the Human Management and Development Area must make available to the victim the medical, physical, mental and psychological care channels and/or refer the victim to a public service support center.
- If the information or complaint arrives through other channels about acts that possibly represent a situation of sexual harassment, the individuals involved or possible witnesses are required to bring the facts to the attention of the Human Management and Development Area within a period not exceeding one (1) business day of being known.
- Within a period not exceeding one (1) business day of receiving the complaint or complaint request, the Sexual Harassment Intervention Committee will be informed in order to start the investigation. The Human Management and Development Area will assume the role until its installation becomes effective.
- Within not more than three (3) business days from the filing of the complaint request, the Human Management and Development Area will order and implement the precautionary measures for the protection of the alleged victim.
- Within not more than fifteen (15) calendar days of receiving the complaint request, the Committee will issue a report containing at least a description of the facts, an evaluation of the evidence, a proposal for a duly motivated sanction or closing of the case, and a recommendation for additional measures to prevent further cases of harassment. During this term, the Committee grants the complainant or respondent a period of time to present the defense.
- The report must be brought to the attention of the sanctioning body within a maximum period of one (1) business day.
- The Human Management and Development Area issues a decision within ten (10) calendar days of receiving the report regarding the sanction as recommendations for preventive measures to avoid new cases of harassment. During such period, it will forward the Committee's report to the accused individual and to the alleged victim of harassment and will grant them a period of time to file their pleadings if they deem it necessary.
- Finally, Interseguro will communicate to the MTPE (Ministry of Labor and Employment Promotion) that it has received a claim or complaint or has initiated an investigation for sexual harassment and precautionary measures applied within not more than six (6) business days of receipt. Moreover, the decision regarding the claim or complaint must be communicated to the MTPE within six (6) business days of its issuance.

6.3 ACTION PROTOCOL



**For more details on the investigation, please refer to the guidelines for handling cases of sexual harassment (Annex 1) and the report template (Annex 2).*

7. SUPPORT INSTITUTIONS AND CHANNELS:

7.1 Internal

- Ethical channel: canaletico@interseguro.com.pe (for more details review Interseguro’s Code of Ethics).
- Intranet: <http://portalinterseguro/> button “Ethical Channel”.

7.2 External

- **Chat 100**

Personalized online and real time service of the National Program against Domestic and Sexual Violence. It works with professionals specialized in psychological information and/or counseling to identify situations of risk of violence in love and/or dating relationships. It also assists people affected by domestic and sexual violence. Its purpose is to prevent situations of risk and physical, sexual or psychological violence. The chat is confidential.

Working hours: Monday to Friday from 8 a.m. to 10 p.m.

Access here: <http://www.mimp.gob.pe/chat100>

- **Line 100**

Free telephone service for information, orientation, counseling and emotional support for people affected or involved in domestic or sexual violence, or who know of a case of mistreatment in their environment.

Working hours: Call Line 100, 24 hours a day, 365 days a year with a landline, public or cell phone.

Line 100 can refer the most serious cases, reporting them to the Women Emergency Centers (CEM) or Line 100 in Action, which will validate the information with a visit to the affected individual(s) to insert them in the specialized services of the CEM. In addition, emergency calls can be made to coordinate the urgent intervention of the police in a situation of abuse or domestic and/or sexual violence.

- **SAU – Urgent Care Service**

It is a free and specialized service which purpose is to provide immediate care to victims of domestic and sexual violence who call Line 100 and/or are reported by the media, and require urgent care, in order to ensure the protection of the physical, emotional and sexual integrity of the affected individual. It attends to high-risk cases, sending a team of professionals to the place where the affected individual is located.

The Urgent Care Service is made up of 14 interdisciplinary teams that provide specialized care through three professionals, a psychologist, a social worker and a lawyer.

Working hours:

The teams work 7 days a week, i.e. Monday to Sunday, including holidays. Monday to Friday from 7 a.m. to midnight and Saturdays and Sundays from 8 a.m. to 8 p.m. in Lima and Callao.

- **CEM – WOMAN EMERGENCY CENTER**

CEMs are free, specialized public services for victims of domestic and sexual violence (regardless of age or sex). The professional services provided are: Admission, psychological orientation, social orientation, legal orientation. Click here for a directory of CEMs nationwide: <https://drive.google.com/file/d/1FpNo7f71dXFMgiJKn7duZFQvuIozXNaX/view?usp=sharing>

- **Temporary Shelters**

Temporary Shelters are places of temporary refuge for victims of domestic violence, also known as Refuges. They provide protection, shelter, food and multidisciplinary attention to promote their integral recovery. The shelters offer women affected by violence safe spaces to analyze and decide on a new life project in peace and without violence, after having received comprehensive and multidisciplinary care: Legal, psychological, and job training.

List of authorities' support numbers:

Fire Brigade	116
Fire Brigade San Isidro	012640339
Police	105
Municipal Police San Isidro	012645900
Alert San Isidro	013190450
Police Station San Isidro	014411275
Women Police Station	014281556
Municipality of San Isidro	015139000
MINTRA (Ministry of Labor)	1819
SAMU (Mobile Emergency Care Service)	106
Hospital Emergencies	117
Medical Emergencies (municipal ambulance)	013190455

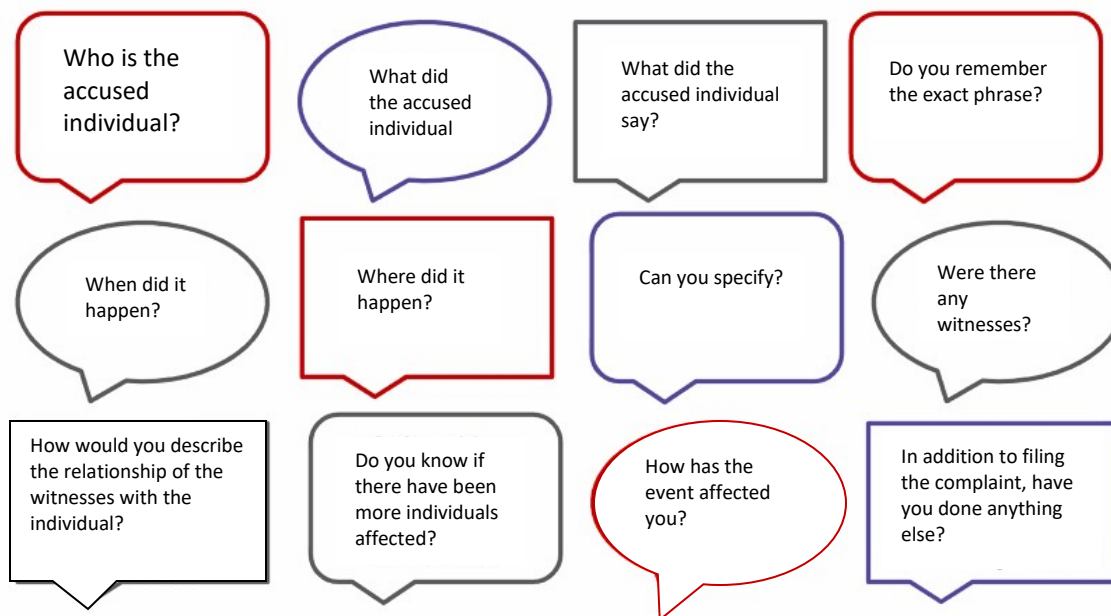
ANNEXES

ANNEX 1: Guidelines for handling Cases of Sexual Harassment

In order to define whether the claim or complaint proceeds as sexual harassment, the following elements must be considered:

1. The reported conduct is sexual or sexist in nature.
2. The conduct is unwanted by the recipient.
3. Intimidating environment, carry out an analysis of the context: Changes in behavior or habits of the victim (avoidance, reactions, etc.), hierarchical relationship, employment situation of the individual.

Recommended questions for information gathering:



Biases and prejudices to be avoided:

- Women must be sexually innocent to be victims of sexual assault. Example: What were you wearing?

- Excessive concern about the risk of false complaints. Suspicions about the veracity of the complaint that raise the evidentiary standard. Idea of good family man and vindictive woman. Example: She does it to get revenge.
- Women must have obvious signs of abuse for the complaint to be credible. Example: Why didn't she say something sooner? Why didn't she react loud and clear?
- Women are not the only ones who suffer sexual harassment, men are also victims of harassment.

Evidence considered valid:

- Witnesses' statements.
- Public or private documents.
- Recordings, e-mails, telephone text messages, photographs, among others.
- Psychological, psychiatric, forensic, graphotechnical; biological, chemical analyses, among others.
- Any other evidence containing information that contributes to the evaluation of the case.

Responsibility for the management of information:

- Information given by the complainant cannot and should not be disclosed without the complainant's consent.
- The information shared by the complainant should be shared only by the relevant individuals in the procedure: Interseguro's Sexual Harassment Intervention Committee and/or VP of Human Management and Development.
- The number of individuals with access to such information is limited.

ANNEX 2: Report Model.

REPORT OF THE LABOR SEXUAL HARASSMENT INTERVENTION COMMITTEE

1. DESCRIPTION OF FACTS:

2. EVALUATION OF EVIDENCE:

a) Conduct of a sexual nature: _____

b) Unwanted behavior by the recipient: _____

c) Conduct that results in an intimidating, hostile or humiliating environment: _____

3. PROPOSAL FOR A SANCTION OR FOR THE CLOSING OF THE CASE:

4. RECOMMENDATIONS: _____

TABLE OF CHANGES

Item	Page	Description of Change
4.4	4	The item 'Sexual Harassment' was updated.
4.5.1	5	The item 'Gender-based Violence' was added.
4.6	5	The item 'Relationship of Authority' was added.
4.7	5	The item 'Advantageous Situation' was added.
4.8	5	The item 'Vulnerable Groups' was added.
5	6	The item 'Complaint Procedure' was updated.
6	6	The item 'Investigation and Sanction of Sexual Harassment' was updated.
7	7	The item 'Support Institutions and Channels' was updated.
4.5.2	6	The item 'Homophobia, Biphobia and Transphobia' was added.
4.8	6	The item 'Conduct of a Sexual Nature' was added.
4.9	7	The item 'Conduct of a Sexist Nature' was added.
4.10	7	The item 'Vulnerable Groups' was updated.
5	7	The item 'Complaint Procedure' was updated.
6.3	12	The item 'Action Protocol' was updated.

	15	The item 'Annex 1' was added.
	17	The item 'Annex 2' was added.