

POLICY				Code: POL-3926	
	HUMAN	RIGHTS		Status: Current Version: 1	
Macro Process:	Strategic Management	Process:	Strategic Management	Publication Date: 21/05/2020	Pages 1 to 6

I. OBJECTIVE

Formalize RIMAC's commitment to human and labor rights recognized in national and international legislation, as well as define the general principles that the company will apply for human rights due diligence.

II. SCOPE

The policy applies to each and every member of the organization, including executives, officers, and general personnel, both RIMAC Seguros y Reaseguros and RIMAC S.A. Entidad Prestadora de Salud, hereinafter referred to as "employees". Likewise, to suppliers, clients, and third parties (consultants, suppliers, or agents), who must comply with the provisions of the code according to contractual agreements, and is extended to any person who is linked to RIMAC Seguros y Reaseguros and RIMAC S.A. Entidad Prestadora de Salud.

III. DEPARTMENTS, POSITIONS, ROLES AND RESPONSIBILITIES

Legal and Corporate Affairs Division

- 1. Approve and/or modify the Human Rights Policy.
- 2. To enforce the Human Rights Policy, taking care of the following stakeholders:
 - a. Shareholders
 - b. Community
 - c. State
 - d. Media
 - e. Competitors

Management and Human Development Division

- 1. To enforce the Human Rights Policy, taking care of the following stakeholder group:
 - a. Employees

Investment Division

- 1. Approve and/or modify the Human Rights Policy.
- 2. To enforce the Human Rights Policy, taking care of the following stakeholders:
 - a. Shareholders

Finance and Risk Control Division

- 1. To enforce the Human Rights Policy, taking care of the following stakeholder group:
 - a. Suppliers

Personal Insurance and Marketing Division

- 1. To enforce the Human Rights Policy, taking care of the following stakeholder group:
 - a. Individual customers

Business Insurance Division

- 1. To enforce the Human Rights Policy, taking care of the following stakeholder group:
 - a. Business/Corporate Clients



POLICY				Code: POL-3926	
	HUMAN	RIGHTS		Status: Current	Version: 1
Macro Process:	Strategic Management	Process:	Strategic Management	Publication Date: 21/05/2020	Pages 1 to 6

IV. POLICY DEVELOPMENT

1 Commitment to respecting international and national standards of Human Rights

- 1.1. RIMAC respects international and national agreements, norms, and covenants in order to act with the highest ethical standards for an inclusive, resilient, equitable, and sustainable society. We have a firm commitment to respect the provisions of the **Universal Declaration of Human Rights**, therefore, we do not engage in business that violates them.
 - 1.2. Human rights underlie all our policies and manuals and are considered in our daily actions as a company. Therefore, we are aligned with the principles of the **United Nations Global Compact** and publicly report our performance in the areas of human and labor rights, anti-corruption practices, and environmental care.
 - **1.3.** RIMAC respects nationally and internationally recognized human rights, including freedom of association, the inclusion of disadvantaged groups, prohibition of child labor, elimination of forced labor, elimination of discrimination of employees and stakeholders.

2 Our principles as an insurer

- 2.1 RIMAC promotes and upholds fundamental values in its management in order to achieve the integral development of its purpose as a company. The values also included in the Code of Conduct are respect for the dignity of people and their inherent rights, respect for equality and diversity, and compliance with the legal framework.
- 2.2 In our role as a provider of insurance products and services, we seek to prevent or mitigate adverse impacts on human rights. In this line, we are aligned with the Principles for Responsible Investment (PRI) and the Principles for Sustainable Insurers (IPS) that integrate human and labor rights criteria. In addition, we are based on the United Nations Guiding Principles for Business and Human Rights, based on the "Protect, Respect and Remedy" approach.

3 Our commitment to Human Rights with Stakeholders

3.1. Employees

Diversity, equal opportunity

3.1.1. RIMAC and all employees foster an environment of cultural plurality and diversity with equal opportunity without discrimination or intimidation based on race, opinion, color, origin, religion, creed, nationality, and place of birth, social status, ancestry, gender, sexual orientation, gender identity, sexual expression, pregnancy, marital status, age, disability, and others.

It is our obligation to treat each other with respect, dignity, fairness, and courtesy. We must always cultivate and encourage team spirit in which we respect the diversity of perspectives, foster a permanent collaborative work environment, seek the personal and professional growth of our employees and promote meritocracy.

3.1.2. RIMAC does not tolerate harassment, sexual harassment, discrimination, and intimidation. If you believe you are being subjected to such acts, you should report it to your immediate supervisor or a member of the Sexual Harassment Intervention Committee and the Integrity Channel. Such acts will be investigated and appropriate action will be taken.



POLICY				Code: POL-3926	
	HUMAN	HUMAN RIGHTS			Version: 1
Macro Process:	Strategic Management	Process:	Strategic Management	Publication Date: 21/05/2020	Pages 1 to 6

- **3.1.3.** We ensure non-discriminatory policies in employment policies and employment equity, benefits in salaries, training, evaluations, promotion opportunities based on performance, and meritocracy. We have an effective process for employee human rights complaints.
- **3.1.4.** The implementation of diversity inclusion and equal opportunity are monitored and evaluated by the Compliance Committee.

Reasonable Working Hours

3.1.5. We ensure that employees do not work excessively long hours. RIMAC has a clear work schedule and specifications for overtime. In addition, we promote flexible working hours and remote work.

Occupational Health and Safety

3.1.7. We avoid potential health and safety risks caused at work. We have periodic evaluations of our employees and implement improvements based on the results.

Freedom of association

3.1.8. RIMAC employees have the freedom of association to promote clear and transparent dialogue.

Prohibition of forced and child labor

- **3.1.9.** RIMAC rejects all forms of forced labor. Our employees are free to make decisions that ensure their safety.
- 3.1.10. Our team is not made up of children. We reject the use of child labor in our company.

3.2. Shareholders

- **3.2.1.** We screen investments through an exclusion list of countries selected by international laws (compliance restriction).
- **3.2.2.** We avoid investing in sensitive sectors such as armaments; forest products industry; tobacco production or trade; and coal production and trading.
- **3.2.3.** Since we aligned ourselves with the Responsible Investment Program, this has been the guide for our investment strategy. We analyze investments that consider environmental, social, and economic factors.

3.3 Customers, Suppliers, and Competitors

3.3.1 RIMAC aims to avoid, anticipate, and mitigate the direct or indirect human rights impacts of our customers and suppliers.

We promote the practice of human rights

- **3.3.2** We apply human rights criteria to evaluate the selection of suppliers. We require their commitment to upholding human rights when establishing contracts.
- **3.3.3** We ensure that our suppliers and customers recognize human rights compliance in their relationship with RIMAC and in their value chain for continuous improvement.

Communication in defense of human rights

3.3.4 Our customers and suppliers who identify adverse impacts to their human rights will be encouraged to take appropriate action, through means such as the Integrity Channel.

We promote respect for human rights in the insurance sector.



POLICY				Code: POL-3926	
	HUMAN	HUMAN RIGHTS			Version: 1
Macro Process:	Strategic Management	Process:	Strategic Management	Publication Date: 21/05/2020	Pages 1 to 6

3.3.5 We position ourselves as leaders in the promotion of human rights in order to be a reference and promote practices in the insurance sector. We are responsible for pioneering initiatives that strengthen the health of our employees and other stakeholders.

Privacy Protection

- **3.3.6** RIMAC seeks to fully protect the privacy of its customers and suppliers and has established measures to control security practices in order to comply with the right to privacy.
- **3.3.7** We constantly monitor the regulations being adopted on information security to take measures to protect our customers' data.

Prohibition of forced and child labor

3.3.8 RIMAC rejects all forms of forced labor in our supply chain. In addition, we ensure that our suppliers do not employ child labor. We establish their commitment to upholding these rights at the beginning of our working relationship.

3.4 Community, the State, and the Media

3.4.1 We are committed to the social environment. Therefore, we invest in projects that benefit the community as long as they are related to our business performance in health and prevention issues in line with the defense of human rights.

Public/private alliances

3.4.2 RIMAC establishes alliances with the State to develop initiatives that promote the fulfillment of human rights in health and education.

Responsible communication

3.4.3 RIMAC communicates responsibly externally under guidelines of defense and respect for human rights.

4. Human rights due diligence

Assessment process

- **4.1.** RIMAC has established a due diligence process to identify, analyze, assess, and manage potential human rights risks to ensure that we are not complicit in human rights abuses. We periodically conduct the process of assessing current or potential human rights risks to prevent or mitigate adverse impacts caused or contributed to by the company.
- **4.2.** The assessment is comprised of five dimensions: 1) Employees, 2) Shareholders, 3) Directors, 4) Customers, suppliers, and competitors, and 5) Community, the State, and the Media.

Education and training

4.3. We engage in human rights awareness activities to ensure that officers and employees have a deep understanding of human rights issues and their involvement in respecting them.

V. RELATED DOCUMENTS

Internal Documents:

- Code of Conduct.
- Sustainability Policy

External documents:

Agreements at the international level:

RIMAC

POLICY				Code: POL-3926	
	HUMAN	HUMAN RIGHTS			Version: 1
Macro Process:	Strategic Management	Process:	Strategic Management	Publication Date: 21/05/2020	Pages 1 to 6

- Convention No. 111 of the International Labor Organization (ILO), on Discrimination (Employment and Occupation), ratified by Peru on August 10, 1970.
- The principles for the empowerment of women.
- The International Covenant on Economic, Social and Cultural Rights.
- The International Covenant on Civil and Political Rights.
- The Convention on the Rights of Persons with Disabilities
- The International Convention on the Elimination of All Forms of Racial Discrimination
- The Convention on the Elimination of All Forms of Discrimination against Women
- The International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.

National Regulations:

- Political Constitution of Peru.
- Law No. 27942, Law for the Prevention and Sanction of Sexual Harassment, which was amended by Law No. 29430.
- Law N°28983, Law of Equal Opportunities between Women and Men.
- Law N° 29783, Occupational Safety and Health Law.
- Law No. 28806, General Labor Inspection Law.
- Law N°30364, Law to Prevent, Punish and Eradicate Violence against Women and Family Members.
- Supreme Decree N° 002-2018- JUS, which approves the National Human Rights Plan 2018-2021
- Legislative Decree N°1057, Regime of Administrative Contracting of Services.
- Supreme Decree N°019-2006-TR, which approves the Regulation of Law N° 28806, General Law of Labor Inspection.
- Supreme Decree N°009-2016-MIMP, which approves the Regulations of Law N°30364, Law to Prevent, Punish, and Eradicate Violence against Women and Family Members.
- Supreme Decree N°010-2003-MIMDES, which approves the Regulation of Law N°27942, Law for the Prevention and Punishment of Sexual Harassment.
- Supreme Decree N°003-97-TR, which approves the Sole Ordered Text of Legislative Decree No. 728, Law on Labor Productivity and Competitiveness.
- Supreme Decree N°008-2016-MIMP, National Plan against Gender Violence 2016-2021.
- National Action Plan on Business and Human Rights (Ministry of Justice and Human Rights).

VI. RESPONSIBLE FOR THE APPROVAL FLOW

Stage	Administration Area/Unit	Title/Position	Name
Elaboration/Updating	Legal and Corporate Affairs Division	Head of Sustainability	Lucero Andaluz
Approval 1 (content):	Legal and Corporate Affairs Division	Executive Vice President of Legal and Corporate Affairs	Javier Venturo
Approval 3 (methodology):	Process Management	Process Analyst ROLE: Document Management Administrator	Herbert De La Quintana
Approval (Operational Risk)	Operational Risk		Carlos Higa
Publication:	Integral Risk Management Committee		Carlos Higa



POLICY				Code: POL-3926	
	HUMAN	RIGHTS		Status: Current Version: 1	
Macro Process:	Strategic Management	Process:	Strategic Management	Publication Date: 21/05/2020	Pages 1 to 6

VII. CHANGE CONTROL

DOCUMENT CREATION						
PREPARATION DATE	DESCRIPTION	٧	ELABORATOR			
21/05/2020	Initial Document	01	Lucero Andaluz			