

**ABN INTERCORP LIMITED**  
**SEXUAL HARASSMENT POLICY**

Our Company has worked hard to build a reputation for responsible behavior and fairness – a reputation that builds trust with our customers, employees, community leaders and shareholders. We can continue to build trust only if we are steadfast in our focus on improving all aspects of Our Credo responsibilities including the quality of our work environment. This philosophy is embodied in Our Credo and in our policy on providing a harassment free workplace.

All employees have a right to work in an environment free from the demoralizing effects of harassment or unwelcome offensive or improper conduct. Sexual harassment or harassment based on race, gender, color, religion, national origin, age, sexual orientation, gender identity or expression, disability, or veteran status or any other status protected by law will simply not be tolerated at ABN Intercorp Limited company.

While it is not easy to provide a complete list of the types of improper behavior, prohibited conduct certainly includes: unwelcome sexual advances, requests for sexual favors, obscene gestures, displaying sexually graphic magazines, calendars, or posters, sending sexually explicit, racially offensive or derogatory e-mails or voice-mails, and other verbal or physical conduct of a sexual or offensive nature, such as uninvited touching of a sexual nature or sexually-related comments.

There is a procedure for investigating and resolving issues of harassment at each operating company. Employees should promptly report incidents of harassment to their immediate supervisor, a higher level of management, or a Human Resources Leader. All questions and concerns will be addressed locally or the employee may call the Common Ground Unit in the Corporate Office of Equal Opportunity and Work Place Solutions or use the Employee Voice Hotline.

All reported incidents will be investigated with an effort to keep the source of the report confidential except where the company finds disclosure necessary for resolution. Where inappropriate conduct has occurred, specific disciplinary actions, up to and including discharge where appropriate, will be implemented. Any employee who, in good faith, reports a possible violation of this policy will be protected from any form of retaliation