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CONFLICT OF INTEREST POLICY			

1. OBJECTIVES:

To define and regulate those situations in which an employee of **Gen Lab del Perú S.A.C.**, by reason of their position, duties, or role, may or may not participate in, decide on, or influence matters within the organization in which they have a personal interest involved.

2. SCOPE:

This policy applies to all employees of **Gen Lab del Perú S.A.C.**

3. TERMS AND DEFINITIONS

Code of Ethics and Conduct: A guide intended to ensure that each employee promotes conduct based on values and honesty in their actions.

Conflict of Interest: A situation in which business, financial, family, political, or personal interests could interfere with a person's judgment in the performance of their duties or obligations within or toward the legal entity.

Public Officials: Those individuals who work in public enterprises and State-owned companies, including mixed-economy companies.

PEP (Politically Exposed Person): Natural persons, whether domestic or foreign, who hold or have held within the last five (5) years prominent public functions or significant roles in an international organization, whether in the national or foreign territory, and whose financial circumstances may be subject to interest.

Fourth Degree of Consanguinity and Second Degree of Affinity: Includes spouse, domestic partner, partner, children, parents, guardian, curator, siblings, grandparents, grandchildren, parents of the spouse or partner, brothers- and sisters-in-law, nephews, nieces, uncles, aunts, cousins, stepchildren, stepmother, stepfather, as well as any other family member who lives with or is financially dependent on the employee, or on whom the employee is financially dependent.

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4. POLICY DEVELOPMENT

4.1. Situations That May Give Rise to a Potential Conflict of Interest

4.1.1. Family Relationships

With another member of Gen Lab del Perú S.A.C.:

When an employee of Gen Lab del Perú S.A.C. has a family relationship up to the fourth degree of consanguinity or second degree of affinity with another employee of Gen Lab del Perú S.A.C.

With persons external to Gen Lab del Perú S.A.C.:

When an employee of Gen Lab del Perú S.A.C. has a family relationship up to the fourth degree of consanguinity or second degree of affinity with a person external to the company who is involved in the ownership or management of a supplier, business partner, or competitor of Gen Lab del Perú S.A.C., or when such person is a government official, member of international or political organizations, a candidate for public office, or affiliated with any Public Administration entity (Politically Exposed Person – PEP).

It should be noted that family relationships, whether internal or external to Gen Lab del Perú S.A.C., are not prohibited; however, there is an obligation to declare them, as stated in sections 4.2.1 and 4.2.2, so that the organization may adopt the appropriate measures in each case.

4.1.2. Representation Relationships

When an employee of Gen Lab del Perú S.A.C. holds participation, either directly as a partner or shareholder, or indirectly through a legal or natural person, in a company that maintains a relationship with Gen Lab del Perú S.A.C. as a client, supplier, or competitor.

4.1.3. Management Relationships

When an employee of Gen Lab del Perú S.A.C. holds management authority as a shareholder, manager, administrator, or any other position with decision-making power in a company that maintains a relationship with Gen Lab del Perú S.A.C. as a client, supplier, or competitor.

4.1.4. Other Situations


Any other situation in which an employee of Gen Lab del Perú S.A.C. may experience a reduction in their ability to make independent decisions.

Examples include individuals who live with the employee or who are financially dependent on the employee, among others.

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4.2. CONFLICT OF INTEREST POLICY

- 4.2.1. Any employee who is in any of the situations described in section 4.1 of this policy is required to submit a **Conflict of Interest Declaration**. This declaration must be completed upon commencement of employment at Gen Lab del Perú S.A.C. and updated whenever there is a change in the declared information or, at a minimum, once per year.
- 4.2.2. Any employee who has a conflict of interest must refrain from participating in the Gen Lab del Perú S.A.C. matter related to such conflict. For example, if an employee participates in the decision to hire a supplier and is subject to a conflict of interest, in addition to submitting the required declaration, the employee must abstain from participating in the supplier selection process. However, in the process of leasing properties intended to serve as facilities for Gen Lab del Perú S.A.C.'s activities, properties owned by shareholders or owners of Gen Lab may be considered for lease, provided that a prior market price evaluation is conducted and the proposal most suitable for operational purposes is selected.
- 4.2.3. It shall be the duty of the Ethics Committee to review and resolve conflicts of interest at Gen Lab del Perú S.A.C.
- 4.2.4. If the conflict of interest affects a Manager of Gen Lab del Perú S.A.C., the Ethics Committee shall resolve the matter. If the affected Manager is a member of the Ethics Committee, they must abstain from participating in the session in which the conflict is resolved.
- 4.2.5. If the conflict of interest affects a shareholder, the matter shall be resolved by General Management, excluding the shareholder affected by the conflict. The Compliance Officer and/or a representative from Human Resources must participate in such session.
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- 4.2.6. The information contained in conflict of interest declarations is confidential and restricted in nature and shall be safeguarded by the Human Resources department.
- 4.2.7. It shall be the responsibility of Human Resources and/or the Compliance Officer to disseminate this policy through the organization's communication channels.
- 4.2.8. The Conflict of Interest Declaration has the nature of a Sworn Statement. Failure to comply with this policy—whether by not submitting the declaration, providing false or incomplete information, or failing to update the information—shall constitute a violation of the Code of Ethics and Conduct.

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4.2.9. All employees of Gen Lab del Perú S.A.C. are committed to reporting, through the established channels, any activities or suspicious conduct that may imply non-compliance with applicable laws or internal regulations.

5. RECORDS

- SIG-A-001 – Sworn Conflict of Interest Declaration

General Management

Lima, November 13, 2025