

Credicorp Corporate Governance Policies

On the recommendation of the Sustainability Committee, the Credicorp Board of Directors approved these policies with the aim of capturing the commitment to its shareholders and other stakeholders, while promoting the highest level of performance of the Board and management, information transparency and proper governance and internal control of Credicorp. The content of this document, which is aligned with the Bylaws of Credicorp, is supplemented by the Code of Ethics, the Internal Charter of the Board and other internal regulations of Credicorp.

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SECTION 1: SHAREHOLDERS

1. General Shareholders' Meeting

Credicorp (the "Company or the "Corporation") encourages its shareholders to participate in and vote at the Shareholders' Meetings, which fall into one of two categories: the Annual General Meeting and the Special General Meeting.

The Annual General Meeting is held within the first quarter of each year and has the following objectives:

- Receive and approve the annual auditor's report and financial statements for the fiscal year,
- Elect Directors (three year-term) and determine their remuneration,
- Appoint external auditors for the coming fiscal year, and
- Resolve any other matters raised during the meeting

Special General Meetings may be held at any time of the year to discuss issues not covered in the Annual General Meeting but that otherwise require shareholder consent under the Bylaws, including: capital increases or reductions, amendments to the Bylaws, removal of Directors and any other matters that the shareholders or the Board may deem fit to submit for the decision of the Meeting.

The **Shareholders Guide** is available at Credicorp's website (<https://credicorp.gcs-web.com/>) under "*Corporate Governance Documents*." This guide contains detailed information on notices of Shareholders' Meetings, shareholders' participation and the procedures to follow before and during the Meeting.

2. Dividend Policy

As its Dividend Policy, the Company intends to declare and pay dividends in cash at least 25% of the Company's consolidated net profits based on the last audited financial accounts.

The Board of Directors shall take into consideration the following at the time of making the decision to distribute dividends:

- There being dividends from the Company's subsidiaries.
- That declaration and payment of dividends shall not cause the Company to breach any applicable laws or adversely impact on the equity growth requirements of the Company or its subsidiaries.
- The financial performance of the Company.
- The overall business and the economic-financial conditions of the Company.
- Any other factors which the Board may deem relevant.

Notwithstanding the foregoing, under Bermuda law, any dividend may only be declared and paid if the Company is able to (i) pay its liabilities as they become due and (ii) the realizable value of its assets is not less than the aggregate value of its liabilities, issued share capital and share premium accounts.

The Board of Directors may in its sole discretion declare and pay a dividend below 25%, if any of the aforementioned conditions fail to be met.

Subject to the foregoing, it is expected that dividend payment shall be made once a year within ninety calendar days of the meeting held by the Board to approve the dividend declaration and payment.

No interim dividends shall be paid.

This policy shall be in force as from the financial year 2016 until amended or rescinded by the Board of Directors.

The dividend policy and the historical information on dividends paid are available at Credicorp's web page, under the tab "*Investors/Stock/Dividend History*".

3. Equitable treatment of shareholders

Shareholders are a group of key interest to the Company. As such, Credicorp applies the principle of equitable treatment of all shareholders, including minority interests, whereby any action that could involve an obstacle to exercising their rights shall be forbidden.

All of the shares issued by Credicorp are outstanding and equal and holders thereof have the same rights conferred by Bermuda Law and Credicorp's Bylaws, which are included in the Shareholders Guide.

4. Communication with shareholders

Within the framework of good corporate governance and sustainability, the Company has incorporated transparency and communication principles. As such, communication with stakeholders is considered a high priority.

Credicorp has an Investor Relations Department, which is in charge of providing complete and timely information to investors, shareholders and the market in general. This Department strives to develop close relations with its stakeholders, with which it maintains contact through meetings, teleconferences, and investor events, among other means.

Those wishing to request information can call, write or send an e-mail to the contacts provided on Credicorp's website under the section "Investor Relations Contacts".

Credicorp's website also contains updated information on Credicorp and its subsidiaries as well as stock information, dividend policy, quarterly and annual results, conference calls, press releases, information reported to the U.S. Securities and Exchange Commission (SEC), presentations, corporate governance documents, alert system, and our complaint system, among other means.

5. Settlement of disputes

The Bylaws provide that any dispute arising out or in connection with the Bylaws, shall be settled by arbitration, to be conducted in English, in Bermuda, under the Rules of the London Court of International Arbitration and according to substantive Bermuda Law.

Additionally, Bermuda Law provides procedures with the authorities and courts of Bermuda for the protection of shareholders, if shareholders' interests have been unduly affected by the Company's acts.

SECTION 2: BOARD OF DIRECTORS

The Board of Directors is responsible for managing and conducting all of the Company's business. The Directors' conduct should be governed by principles of loyalty, good faith, care and diligence, always seeking the long term benefit of the Company and its shareholders.

For the purposes of aligning Credicorp's structure and organization to the Economic Substance regulations enacted by the Bermuda Government, Credicorp's Board of Directors has determined that, from October 29, 2020, it will limit its decisions to matters pertaining to the strategy, objectives and goals of the Company, as well as main action plans and policies, risk control and management, annual budgets, business plans and control of their implementation, supervision of main expenses, investments, and acquisitions and dispositions, among other decisions of a "passive" nature related to the Company.

The authority to make "active" decisions pertaining to Credicorp's subsidiaries, such as taking relevant strategic or management decisions, incurring expenditures on behalf of affiliates, coordinating group activities, and providing credit facilities to its affiliates, will be taken by the Board of Directors of Grupo Credito S.A., a subsidiary of Credicorp.

The Boards of Directors (and Board Committees) of each of Credicorp and Grupo Credito are composed of the same individuals and the management structure in both companies has been standardized.

1. Composition of the Board of Directors

Credicorp's Board of Directors shall be comprised of nine (09) Directors, which are elected by the General Shareholders' Meeting for a period of three (03) years. Directors may be reelected.

Amending the number of directors or the duration of their terms requires a resolution passed by the Shareholders' Meeting, approved with the favorable vote of at least two-thirds (2/3) of the total shares of voting stock issued by the Company.

The Board of Directors should have an adequate number of Independent Directors. This number should be not less than three (03) members and, if possible, have a majority of independent members. To be considered independent, a Director must meet the independence criteria set forth in Point 2 hereof.

Efforts shall be made to for the Board of Directors to be made up of individuals with well recognized track records and knowledge of, or experience with, different economic sectors in Peru and other countries, providing as much diversity of knowledge and experience as possible.

2. Independence Criteria of Directors

A Director shall be deemed to be independent for the purposes of its internal policies if he/she meets each of the following conditions:

1	Employee or Related Director of Credicorp and/or Subsidiaries	Not being or having been, in the last three years, a Related Director or employee of Credicorp and/or subsidiaries.
2	Employee or Director of Company holding >=5% interest in Credicorp	Not being or having been, in the last three years, a director or employee of a company holding >=5% interest in Credicorp. This criterion shall not apply to directors with an independent status in Credicorp and/or subsidiaries.

3	Shareholder holding >1% interest in Credicorp	Not being a shareholder with >1% interest in Credicorp, not being entitled to exercise voting rights in excess of such percentage nor have preferential voting rights nor have any agreement or agreements allowing such shareholder to exercise the rights to purchase Credicorp shares in
4	Cross Directorship	Not being a director or a member of the Senior Management of a company in which any Related Director or member of the Senior Management of Credicorp is a member of the Board of Directors. Such restriction shall not apply when cross directorship is with respect to Credicorp subsidiaries.
5	Cross-Compensation Committee	Not being or having been a member of the Senior Management of a company in which any Related Director or member of the Senior Management of Credicorp is or has been a member of the Compensation Committee of the board of directors in the last three years.
6	Significant Business Transactions	Not being a shareholder with >5% interest, partner, director or member of the Senior Management of a third-party company which makes or has made business or contractual transactions for >1% of the annual revenue of Credicorp or >5% of the third-party company, or >5% of the annual income of the proposed director in the last three fiscal years.
7	Direct Compensation or Compensation to a Relative >US\$120,000	Not having received from Credicorp and/or subsidiaries any compensation >\$120,000 over a period of 12 months during the last three years, excluding directors fees and revenue from investments in financial instruments (bonds, shares, term deposits, among others) of Credicorp and/or subsidiaries. Applies also with respect to Relatives.
8	Auditing Firm Employee or Partner	Not being or having been an employee or partner of the auditing firm of Credicorp and/or subsidiaries in the last three years.
9	Relative of Shareholders with >=5% interest in Credicorp, of Director or of Senior Management Member	Not being a Relative of shareholders with >=5% interest in Credicorp, or of members of the Board of Directors or the Senior Management of Credicorp.
10	Participation in >5 Board of Directors of RPMV	Not acting as an independent director in >5 boards of directors of companies entered in the Securities Market Public Registry (RMPV). Excludes boards of directors of Credicorp and/or subsidiaries.
11	Tenure > 10 Years	Not being or having been an independent director for over 10 continuous or alternate years during the last 15 years in Credicorp and/or subsidiaries.
12	Other Criteria	The Board of Directors shall be entitled to determine the Independence of a director in situations calling for interpretation or which have not been contemplated in this document.

Definitions

Senior Management: is made up of the following roles:

- CEO
- General Manager
- Deputy General Managers
- Managers in charge of the four Business Units (Universal Banking, Microfinance, Insurance and Retirement, and Investment Banking and Asset Management)
- Managers with the following Corporate Roles:
 - Financial Manager
 - Risk Manager
 - Audit Manager
 - Compliance Manager
 - Legal Manager
 - Corporate Human Management and Development Manager
 - Talent Manager
 - Corporate Affairs Manager

Related Director: the Credicorp director who is not considered independent.

Relative: a person having an up to second-degree blood or affinity relation, including common law or similar affective relationships.

Corporate Role: it is the function of corporate scope that implies direct or shared responsibility with the management of the business units.

The aforementioned independence criteria apply to Credicorp, since regulated subsidiaries must meet the independence criteria defined by their respective regulator. In the event that the

subsidiary of Credicorp does not have a specific regulation regarding the independence of its directors, it will apply the Credicorp criteria.

Notwithstanding the foregoing, all members of the Audit Committee must be independent according to Rule 10A-3 under the Securities Exchange Act of 1934 independence definition. In order to be considered independent, the member of the Audit Committee must not (i) accept from Credicorp or any of its subsidiaries, directly or indirectly, any consulting, advisory or other compensatory fee, other than the compensation in his or her capacity as a director, except in the case of a retirement plan that meets the conditions established by the SEC; nor (ii) be an affiliated person of Credicorp or its subsidiaries (that is, they must not own or control, directly or indirectly, more than 10% of the Company's voting shares and they must not be an executive officer of Credicorp, according to Rule 10A-3 under the Securities Exchange Act of 1934 and the U.S. Securities and Exchange Commission - SEC).

3. Criteria for the Selection of Directors

Credicorp Directors are selected, evaluated and recommended by the Compensation and Nominations Committee for approval at the Annual General Meeting based on the following general criteria:

- Honorability, ethics, reputation, integrity, prestige and good public image;
- Recognized and impeccable professional track record;
- Ability to contribute to the Company with his/her knowledge;
- Academic background and professional experience;
- Knowledge and business experience in one or more sectors of economic activities;
- Technical and moral qualifications for impartial business decision-making, risk management and control of the Company; and
- Any other factors deemed relevant by the Compensation and Nominations Committee.

A Board of Directors that collectively possesses the knowledge and expertise in the following will be sought:

- Macroeconomic policy
- Sectors and industries in which the Company participates
- Local, regional and global markets
- Advanced financial matters in which the Company participates
- Risk management
- Financial reports
- Legal and regulatory environment
- Corporate affairs (relations and communication with external groups, reputation)
- Corporate governance
- Social and environmental issues
- Compensations, among others.

Restrictions

- He/she must not have any interests contrary to those of the Company;
- No limits have been set on the age of Director, the length of his/her service or the number of outside boards of directors on which a Director may serve; except as provided in the criteria to be considered an independent Director defined in the point 2.

4. Proposal and Election of Directors

Prior to every Annual General Meeting at which a Director is to be elected, the Compensation and Nominations Committee shall be in charge of preparing the least of nominees. The Committee will consider all proposals received (whether from the Committee, the Board of Directors, the management, or from the shareholders) and will decide, based on the selection criteria, who will be included in the final list of nine (09) nominees to make up the Board of Directors.

Shareholders who wish to nominate candidates shall submit their proposals to the Compensation and Nominations Committee within the time frame set by the Company (before January 15th of the year when Director Elections are due).

On the recommendation of the Compensation and Nominations Committee, the Board of Directors will submit the list of selected candidates for approval by the shareholders at the Annual General Meeting.

Directors shall be elected individually and by a majority of valid votes cast. Shareholders shall be entitled to one vote per share per candidate. For each candidate, shareholders shall have the option to vote in favor, or against, or to abstain from voting. A candidate shall be elected if the number of votes in favor is higher than the number of votes against him/her (abstentions are not computed). Otherwise, a vacancy will be generated, in which case such vacancy shall be filled by the Regular Shareholders Board or by the Board of Directors, if the Regular Shareholders Board has delegated such authority.

5. Board of Directors' Committees

Credicorp's Board of Directors has established the following corporate level Committees:

- Audit Committee¹
- Corporate Sustainability²²
- Remuneration and Compensation Committee³
- Risk Committee⁴

The Board of Directors, acting on the recommendation of the Chairman, shall decide on the appointment, ratification or removal of Committee members as well as their Chairmen. Directors who are members of the Committees will initially be appointed up to a three (03) year term, and shall maintain such appointments only while a member of the Board. Non-Director members of the Committees shall maintain such appointment only while he or she is an employee of the Credicorp or any of its subsidiaries. All Committees shall have a charter approved by the Committee itself and shall designate a Chair from among its members. The Chairman in no case may preside over any Committee.

The Committees will have the authority to contract the services of external advisers and determine their compensation.

5.1 Audit Committee

The purpose of the Audit Committee is to carry out the independent supervision, monitoring and review of:

- The processes used to prepare financial and accounting reports of Credicorp and subsidiaries;
- The internal control procedures of Credicorp and its subsidiaries;
- The audits performed on the financial statement of Credicorp and its subsidiaries;
- The completeness of the financial statements of Credicorp and its subsidiaries; and
- Fraud and complaints filed by employees or third parties.

After the General Meeting of Shareholders approves the hiring of independent auditors, the Audit Committee will be in charge of hiring and supervising said auditors. The auditors must report directly to the Audit Committee and such Committee will have the power to require any other audit, review or verification of accounting or auditing issues.

The Audit Committee shall oversee the financial reporting system of Credicorp and its subsidiaries,

¹ Established on October 31st 2002

² Established on June 23rd 2010. Formerly "Corporate Governance Committee", name modified by the Board of Directors on December 17, 2020.

³ Established on January 25th 2012 under the name "Compensations Committee". Merged with the Nominations Committee since June, 2020.

⁴ Established on March 28th, 2012 under the name "Risk Management Committee".

helping ensure that:

- Management implements an adequate internal control system;
- There are appropriate procedures to objectively and regularly evaluate the Corporation's internal control system; and
- The external auditors, through their own independent assessment, review the financial and accounting policies applied in the preparation of the Company's financial statements.

The Committee shall propose to the Board of Directors, to be approved at the General Shareholders Meeting, the appointment of independent auditors and their remuneration.

The Committee shall also establish procedures for (i) the receipt, retention and treatment of complaints received by Credicorp regarding accounting, internal accounting controls, financial or auditing matters and (ii) the confidential, anonymous submission by employees of Credicorp or other parties on accounting and audit issues.

The Committee shall consist of no fewer than three (03) Directors of Credicorp. All members of the Committee must be independent according to the U.S. Securities and Exchange Commission (SEC) independence definition. The Committee shall have at least one (01) member who is considered to be a financial expert. The Chairman shall not be member of the Committee.

5.2 Sustainability Committee

The main objectives of the Sustainability Committee are to:

- Propose to the Board of Directors sustainability and good corporate governance practices to be implemented throughout the Company and keep them updated over time;
- Review Credicorp's Sustainability and ESG strategy and initiatives, and follow up its most relevant activities, including the Sustainability program;
- Ensure adequate attention to conflicts of interest or ethics of Directors and senior executives, as well as transparency in relationships with related parties;
- Propose to the Board of directors the criteria of independence of the Directors and review them periodically to ensure their validity over time.
- Propose to the Board of Directors the independence criteria that the members of the Audit Committee must meet.
- Propose the matrix of profiles and competencies of the Directors that allows having an adequate conformation in the Board of Directors.

The Committee shall be comprised of at least three (03) Directors of Credicorp or its subsidiaries, at least two of which shall be independent. It will be chaired by one of the independent directors. Additionally, the Board of Directors may incorporate as a member one or more Directors of Credicorp subsidiaries. The Chairman shall not be member of the Committee.

5.3 Remuneration and Compensation Committee

The main objectives of the Remuneration and Compensation Committee are as follows:

- Select and recommend to the Board of Directors the nominees to Directors of Credicorp, as well as the nominees to fill vacancies in the Board of Directors of the Company;
- Perform an evaluation of the candidates to the Board of Directors to determine if they meet the Company's independence criteria specified previously in Section 2.
- Propose to the Board of Directors of Credicorp, for submission to the General Shareholders' Meeting, the attendance fees, remuneration levels and other compensation and benefit policies of members of the Board of Directors and Board of Director Committees of Credicorp;
- Establish the general guidelines of the Compensation Policy that must be implemented in the Company.

The committee shall consist of no fewer than three (3) Directors of Credicorp or its subsidiaries, at least

two (2) of which shall be independent. It will be chaired by one of the independent directors.

5.4 Risk Committee

The Risk Committee has the following main duties:

- Acknowledge and inform Credicorp's Board of Directors the level of compliance with the risk appetite and the level of exposure assumed by Grupo Crédito and other Credicorp subsidiaries;
- Acknowledge the relevant improvements in the comprehensive risk management of Grupo Crédito and Credicorp subsidiaries.

The Committee shall be consist of two (2) Directors of Credicorp, one of which shall be independent. Additionally, the Board of Directors may incorporate as a member one or more Directors of Credicorp subsidiaries.

6. Work Procedures

- There shall be an Internal Charter of the Board of Directors.
- The Credicorp Board of Directors shall hold regular meetings on a bimonthly basis.
- A record of attendance at Board of Directors and Committee meetings shall be kept by the General Secretariat.
- The agenda and any materials to be addressed at each meeting shall be given to the Directors in a time frame sufficient to permit the Directors to allow review such materials prior to the meeting.
- If a Director or a Committee requires additional information to make a decision, the Director or Committee may request such information through the Board of Directors or the Management.
- Management shall report to the Board of Directors on a regular basis.
- Board of Director and Committee resolutions shall be entered in the minutes of the meeting.
- Communications by shareholders and other interested parties to the Chairman of the Board of Directors or the Independent Directors shall be channeled through the Investor Relations Department. Contact information is available in the Credicorp website, under the tab "Investor Relations Contacts."

7. Conflict of Interest

Directors shall abstain from participating in debates and voting in connection with matters where they may have a conflict of interest with the Company. Committees and Board of Directors minutes shall expressly mention such abstention.

Additionally, on an annual basis, each Director shall submit to the Company's General Secretariat, an updated affidavit identifying any companies in which they are shareholders, with holdings in excess of 4% of the stock, or where they hold positions as Directors or Managers.

8. Directors and Committee members Remuneration

The Remuneration and Compensation Committee shall propose to the Board of Directors the remuneration policy and levels, compensation and other benefits applicable to members of the Board of Directors and the Committees designated by the Board of Directors. When required, the Board of Directors shall recommend the proposals to the General Shareholders' Meeting and shall submit them for approval thereby.

9. Induction and Training

It is expected that new Directors will take part in the Induction Program organized by the Company. The Company shall provide the support necessary to ensure that members of the Board of Directors are adequately trained. The Corporate Governance Committee and the Board of Directors may each

suggest subjects for Director training. In addition, any Director may request that the General Secretariat schedule training on specific subjects.

10. Performance Evaluation

Annually, the Board of Directors shall perform a self-evaluation of its performance. The Sustainability Committee shall provide methodological support for the evaluation process.

11. Vacancy of Directors

The office of Director shall be vacated if the Director:

- Is removed from office pursuant to the By-Laws or is prohibited from being a Director by law;
- Is or becomes bankrupt or makes any arrangement with or assignment to his creditors generally;
- Is or becomes of unsound mind, physically disabled or dies;
- Resigns his or her office by notice in writing to the Company.

In case of any vacancies in the Board of Directors, the Board of Directors may appoint a person to fill such vacancy until the next election and complete the number of Directors. The General Shareholders' Meeting may also fill such vacancy.

Appointment of the person to hold the position of Director shall be made no later than on the third meeting of the Board of Directors held after occurrence of such vacancy.

In the occurrence of vacancies in the Board of Directors in a number that would prevent functioning thereof, the remaining Directors may validly pass resolutions to convene a General Shareholders' Meeting or adopt decisions to preserve the Company's assets. If the General Shareholders' Meeting fails to be called or if all Directors have been vacated, the Executive President, or otherwise the General Manager of the Company shall call such meeting. In any of the above cases, the call shall be made within ten (10) days of becoming apprised of such vacancies.

SECTION 3: DISCLOSURE AND TRANSPARENCY POLICY

1. General Principles

Within the framework of disclosure and transparency of corporate information, Credicorp have established the following general guidelines:

- The information disclosed to shareholders, investors, external auditors, regulatory entities, risk classifiers, market analysts and the market in general should be truthful, complete, timely, clear, understandable and in compliance with all applicable law.
- The Company will adopt measures necessary to provide relevant information to investors and guarantee proper disclosure of all information as required under applicable law.
- The Company will use widely-accessible communication channels to provide investors with equitable, fair and regular access to information at a reasonable cost. Information will be disclosed through the Company's website, regulatory entities' websites, conference calls, conferences and meetings, among other venues.
- Credicorp will publish its financial results on a quarterly and annual basis, in IFRS. These reports will be available on Credicorp's website and will be presented and discussed on quarterly conference calls that will be open to the public.
- Financial statements and other financial information that is disclosed to the market will reasonably represent, in all material respects, Credicorp's financial situation and results of operations.
- The Company will establish and maintain adequate internal controls and procedures regarding financial reporting and other information that the Company must disclose in the reports it presents to the SEC and other regulators, in accordance with the Sarbanes-Oxley Act of 2002 (SOX).

2. Communication with shareholders and investors

Public information on the Company will generally be available on Credicorp's website. Any questions or specific requests for information from shareholders, investors, market analysts or other stakeholders of Credicorp will be managed by the Investor Relations Department. Contact information for the Investor Relations Department can be accessed through the Credicorp website under the "Investor Relations Contacts" tab.

The Investor Relations Department will endeavor to answer information requests and questions within seven (07) calendar days of the date on which the request is received. To ensure transparency and equitable disclosure of corporate information, the following general principles will apply:

- No material information will be shared with a shareholder, investor, market analyst or other stakeholder that is not accessible by all such persons or that is not otherwise publicly available.
- The information shared with these stakeholders will not include information that is subject to the Company's policy set out below under "Restrictions on Information Disclosure" below.

3. Restrictions on information disclosure

Credicorp's policy is to abstain from disclosing information or making comments regarding:

- Forecasts of results
- Negotiations that are underway and reserved material events that have not yet been disclosed to the market
- Monthly financial information in IFRS of Credicorp and its subsidiaries
- Information that is considered reserved or confidential by the Company

4. Quiet Period

The Company has established a quiet period beginning fifteen (15) calendar days prior to the release of financial statements and ending on the date of the release thereof. During this quiet period, Credicorp shall not from answer questions or make any comments pertaining to its earnings results.

5. Disclosure of Material Events

All material information and events affecting the Company will be disclosed to the market in a timely and equitable manner, in compliance with applicable law and the Internal Conduct Regulations pertaining to the release of material facts and reserved information of Credicorp.

SECTION 4: INTERNAL AUDIT⁵

1. Introduction

This document aims to define the purpose, authority and responsibility of the internal audit function at Banco de Crédito del Perú and subsidiaries and Credicorp and subsidiaries, as applicable.

Each Internal Audit Unit (IAU) at Credicorp adheres to the International Professional Practices Framework (IPPF) of The Institute of Internal Auditors (IIA) of the United States. Audits related to technology and information systems are conducted according to the guidelines of the Information Systems Audit and Control Association (“ISACA”).

2. Mission

To evaluate on an ongoing basis the effectiveness and efficiency of the risk management, control and governance processes of Credicorp and its subsidiaries and affiliates, for purposes of improving and protecting the value of the Corporation providing assurance, advisory and risk-based analysis.

3. Vision

To be an independent, professional, objective and change-promoting unit recognized by the Corporation for adding value and protecting it in accordance with its Mission and for using the best techniques and practices in its audit and consulting procedures.

4. Fundamental principles for the internal audit professional practice

The principles describe internal audit effectiveness in furtherance of the Regulations and the Code of Ethics, and are the following:

1. Shows integrity.
2. Shows professional competence and diligence.
3. Is objective and free of influences (independent).
4. Is aligned with the strategies, objectives and risks of the Corporation.
5. Is appropriately positioned and has the resources required.
6. Shows commitment to quality and continuous improvement of its work.
7. Communicates effectively.
8. Provides risk-based assurance.
9. Makes in-depth analyses, is proactive and is future-oriented.
10. Promotes betterment of the Corporation.

5. Scope of Work

According to the International Professional Practices Framework (IPPF), the IAU’s scope of work is to determine if risk management, control and corporate governance processes are adequate and functioning well to ensure that:

- a) Risks are adequately identified and managed.
- b) The Company’s governing bodies interact as planned.
- c) Relevant information is precise, reliable and timely.

⁵ Executive summary of the Structure and Functions of Internal Audit Regulations

- d) The activities and actions of the organization's employees fulfill applicable normative and ethical requirements.
- e) Resources are procured at the best price, are used efficiently and are adequately protected.
- f) Organizational programs, plans and objectives are fulfilled.
- g) Quality and continuous improvement in control processes is encouraged.
- h) Relevant regulatory and normative issues are duly recognized, dealt with and fulfilled.

6. Scope of Authority

The Internal Corporate Auditor reports functionally to the Board of Directors and by assignment to the Audit Committee. At an administrative level, it reports to the General Management.

7. Functions

The scope of its functions covers Banco de Crédito del Peru and its subsidiaries as well as Credicorp and its subsidiaries and affiliates both nationally and internationally:

- a) Conduct periodic audits according to the Annual Work Plan approved by the Audit Committee; as well as special audits per request of the Board of Directors, the Audit Committee, the Company's Management or those of its subsidiaries or at its own initiative. The Annual Plan should be based on an assessment of the Company's risks. It must be flexible and include the needs and expectations of the Management and the Board of Directors.
- b) Conduct audit exams with total independence to fulfill a fundamentally preventive and corrective role while providing necessary advice and guidance.
- c) The Internal Corporate Auditor and IAU are authorized to:
 - Unrestricted access to all of the Company's functions and processes, records, properties and staff; accounting, files and documents from subsidiaries or audited units of the Corporation, and to other sources of information in connection therewith, the review of which is deemed necessary for performance of its duties and declare its responsibility for safeguarding the information assets received and the confidentiality thereof, in accordance with the Implementation Guidelines 1000 of the IIA. For such purposes any member of the IAU of the Corporation who performs work of a corporate scope as defined by the Corporate Auditor or the Audit Division Manager of BCP shall be deemed a corporate auditor.
 - Restricted information will only be available to the Corporate Auditor. The Audit Committee will determine the scope of restricted information.
 - Have unrestricted access to the Audit Committee or the Board of Directors.
 - Allocate resources, select staff, set frequencies, periodicity, scopes, and time needed for the regular development of the audit work.
 - Obtain the necessary assistance of staff in the organization as well as other specialized services from within or outside the organization.
 - Immediately report to the Audit Committee of any attempt to interfere with the performance of its duties.
- d) The IAU is not authorized to:
 - Perform operational or management duties for the Company.
 - Initiate or approve accounting transactions external to IAU.
 - Implement internal controls, develop procedures, install systems or engage in any activity that can affect its judgment, independence and objectivity.
- e) Verify compliance with the provisions of Peruvian Banking Law (*Ley General del Sistema Financiero y del Sistema de Seguros y Orgánica de la Superintendencia de Banca y Seguros*), Peruvian Healthcare Providers Law (*Ley de Empresas Prestadoras de Salud*), the rules issued by

the competent authorities in each country in which one of the Company's subsidiaries or audited units conducts business and with regard to its own Normative System.

- f) Monitor follow-up observations and recommendations relative to the assessments conducted internally as well as those made by regulatory entities and external auditors.
- g) Analyze processes and propose, when pertinent, any changes needed at the procedural level and institute controls that help minimize risks, improve the quality of customer service and increase the Company's efficiency and effectiveness.
- h) Evaluate the design and operation of internal controls relative to the financial reporting of Credicorp and its subsidiaries to ensure compliance with the provisions of the Sarbanes– Oxley Act (SOX).
- i) Evaluate the consistency and sufficiency of the calculations of Capital Requirement related to Integrated Risk Management and verify the consistency, reliability and timeliness of the data sources used in the internal models developed by the institution.
- j) Supervise the activities conducted by other Audit Units at the Company's subsidiaries.
- k) Maintain an on-going professional training program to ensure that Company's audit team has the skills, experience and international certificates that help ensure that IAU fulfills its objectives.
- l) Evaluate significant merger/acquisition activities as well as new (or modified) services, processes, operations and process controls during the development, implementation or expansion phases.
- m) Inform the Audit Committee about new trends and practices in the audit field.
- n) Assist in material fraud investigation.
- o) Consider the scope of the work performed by external auditors, regulators and other advisors to provide adequate audit coverage at reasonable costs.
- p) Provide the Audit Committee with useful, necessary and objective information to evaluate IAU's performance.
- q) Be duly informed about all relevant aspects of its activities. To ensure this, the IAU can attend all meetings, committees and forums to which it is invited and, pending prior approval, participate in all activities that the auditors deem relevant.
- r) As defined by the IIA, its Standards 1120, 1130, 1130.C1, 1130.C2; consulting services are the advisory, consultancy and other activities in connection with the services provided to the client, the nature and scope of which are agreed with the client and are intended to add value and improve governance, risk management and control processes of an organization.
- s) When the IAU has or is expected to have duties and/or responsibilities beyond internal audit, safeguards are put in place to limit any hindrances to independence and objectivity, in accordance with Standard 1112 and its Implementation Guidelines 1112.

SECTION 5: RISK MANAGEMENT

Guidelines for Corporate Risk Management

1. Document Purpose

This document describes the scope and principles on which the corporate risk management system of the Credicorp Group is based.

Corporate risk management seeks to identify, measure, address, monitor, communicate and assign responsibilities for the various types of risk that faced by the Group to:

- Strengthen corporate risk management in consistency with the best practices and regulations;
- Encourage and adequate dissemination of the Corporation's risk culture; and
- Maintain a corporate risk control structure.

2. Scope of Corporate Risk Management

The Credicorp Group manages risk by considering best practices and complying with the legal and regulatory requirements of each country in which it operates.

a) Entities: Corporate risk management system includes all companies of the Credicorp Group: Atlantic Security Bank (ASB), Banco de Crédito de Bolivia (BCB), Banco de Crédito del Perú (BCP), Credicorp Capital, Mibanco, Pacífico Grupo Asegurador (PGA), and Prima AFP, among others.

b) Risks Covered: Corporate risk management covers the following risks:

- Credit and Counterparty Risk: the probability of sustaining losses caused by default in payment by debtors or counterparts in balance and off-balance exposures.
- Operational Risk: the probability of sustaining losses caused by faults or deficiencies of people, processes, information technology, third party relations and external events which may have an adverse impact Credicorp or its subsidiaries.
- Liquidity Risk: the probability of sustaining losses:
 - I. Due to failure to renew liabilities or taken on other liabilities under normal conditions; or
 - II. Due to an early or forced sale of assets, at unexpected prices, to be able to face obligations; or
 - III. Due to failure to settle, acquire or timely cover a position through the establishment of an equivalent counter position.
- Market Risk: the probability of sustaining losses from changes in risk factors (interest rates, exchange rates, or other market variables) with an effect on the expected results.
- Strategic Risk: the probability of sustaining losses due to associated high-level decisions or the creation of sustainable competitive advantages. This risk is related to failures or weaknesses in market analysis, trends and environment uncertainty, key competences of the company, and the process of value generation and innovation.
- Reputational Risk: the probability of sustaining losses due to a decrease of trust in the integrity of the institution, with results from loss of prestige, poor image or negative publicity, whether or

not true with respect to Credicorp or its subsidiaries, causing loss of customers, lower income or the presence of legal proceedings.

- **Insurance Technical Risk**: the probability of sustaining losses inflicted by the inappropriate establishment of the technical or actuarial bases used to calculate premiums and insurance technical reserves, due to insufficiency of reinsurance coverage, and the unexpected rise in expenditure and their distribution throughout the claims term.
- **Country Risk**: the probability of occurrence of economic, social or political events in a foreign country that may adversely affect the interests of Credicorp. Country risk goes beyond the credit risk of any financing operation and includes, without limitation, sovereign, transfer and asset expropriation risks.
- **Social and Environmental Risk**: the probability of sustaining losses due to the occurrence of social conflicts associated with the development of projects, which may have a material effect on the economic, social or environmental system in which they are developed.
- **Money Laundering and Financing of Terrorism Risk**: the probability of any Credicorp Group company being used for money laundering and financing terrorism. This definition excludes reputational and operational risk.

3. Reporting and Interaction among the Risk Units of Credicorp

- Hierarchical Report**: the risk unit of each subsidiary reports to its General Management the progress made in risk management to meet the corporate standards defined by the Chief Risk Officer of Credicorp (Central Risk Manager of BCP).
- Functional Report**: risk management shall be governed by the corporate policies and standards set in the CRO of Credicorp; furthermore, the risk units of the subsidiaries shall keep a functional report to the CRO on the status of risks to which they are exposed, the level of adjustment to the corporate guidelines set, and on compliance with their respective risk strategic plans.

4. General Corporate Risk Management Principles at Credicorp

- Senior Management involvement**: The Board of Directors sets the objectives, policies and risk appetite of Credicorp, with some of these duties delegated to the Risk Management Committee of Credicorp. The Board of Directors and the Senior Management of Credicorp of each company of the Credicorp Group assess and manage the risk exposure of each company of the Credicorp Group.
- Independent risk management**: The duties of risk areas and business and support areas are clearly segregated, affording sufficient independence and autonomy to perform an adequate risk control, avoiding conflicts of interest.
- Sufficiency and quality of resources associated with risk management**: Sufficiency and quality of the resources for proper development and maintenance of the risk management system, including technological infrastructure and knowledge of general personnel and of personnel that specialize in risk management, are ensured.
- Measurement of performance in terms of risk taken**: Risk ratios are considered to measure personnel, operations and portfolio performance.
- Monitoring and validation**: Adequacy to both corporate risk policies and the methodological standards by the companies of the Credicorp Group is monitored and verified.

- f) **Compliance with the Credicorp Code of Ethics:** The policies and guidelines set for risk management are based on the principles of the Credicorp Code of Ethics.

5. Duties and Responsibilities

- a) **The Board of Directors of Credicorp:** is responsible for approving the risk appetite and tolerance; and the objectives, policies and guidelines for managing risk of Credicorp. The Board of Directors also oversees the internal control system of Credicorp and monitors implementation of corporate risk policies by the management. Likewise, the Board of Directors establishes an organizational culture that emphasizes the importance of risk management to Credicorp and ensures proper performance of regulatory compliance within the Company.
- b) **Boards of Directors of Credicorp Group companies:** approve in their respective companies: (i) risk appetite and tolerance, and the associated objectives and business plans; (ii) risk management policies and guidelines, in line with corporate policies; (iii) the setting of a proper solvency level; and (iv) the setting of an incentive system that fosters proper functioning of the overall risk management.

Additionally, such Boards of Directors establish an organizational culture that emphasizes the importance of risk management, supervise the internal control system, and ensure proper performance of regulatory compliance within each company.

- c) **Risk Management Committee of Credicorp:** represents the Board of Directors of Credicorp risk management decision-making.
- d) **Chief Risk Officer of Credicorp (CRO of Credicorp):** is responsible for three corporate dimensions:
- *Be the risk management custodian:* (i) owns the process of risk appetite definition; (ii) defines corporate risk policies and oversees application thereof; (iii) facilitates discussion of risk appetite proposals of the Credicorp Group and each of its companies, which are submitted to the Credicorp Risk Committee and the Credicorp Board of Directors; (iv) oversees compliance with risk appetite thresholds and management of any gaps thereof;; (iv) defines, updates and disseminates the methodological standards and corporate policies applicable to each risk category.
 - *Participate in corporate risk governance:* (i) chairs all corporate tactical committees of risk sub-functions; (ii) is responsible for corporate reporting on risk matters within and outside the organization; (iii) is the top opinion level on risk matters in the Credicorp Group before the Credicorp Risk Committee and the Credicorp Board of Directors; (iv) risk managers of each company of the Credicorp Group have dotted line reporting to the CRO.
 - *Provide centralized risk services:* (i) is in charge of centralized risk services (e.g., Market Risks, Global Risk Management, Own Insurance Management); (ii) is responsible for compliance with SLAs, the quality of deliverables, and client satisfaction level with centralized risk services.
 - Furthermore, it is responsible for promoting the risk culture within the Credicorp Group.
- e) **The General Managements of the Credicorp Group companies:** are responsible for implementation, functioning and effectiveness of the risk management system in each of their companies, including compliance with the Risk Appetite Framework and solvency level. Furthermore, the General Management of each Credicorp Group company must ensure that an adequate system of internal controls, a risk-based incentive system, and sufficient resources to monitor and manage risk in its company are in place.
- f) **Risk Management Units with corporate activities:**

- Credit Risk Administration Management and Corporate Risk Management of BCP: is responsible for articulating risk management within the Credicorp Group, serving as the main coordinator between companies of the Credicorp Group in risk-related matters. It is also responsible for coordinating development and monitoring the Corporation's Strategic Risk Plan of the Credicorp Group, and for coordinating the ongoing updating of corporate policies.
 - BCP Global Risk Management: is responsible for (i) leading the definition of Credicorp's risk appetite; (ii) defining the methodologies and developing the models to estimate economic capital and conduct stress testing of the Credicorp Group and the Credicorp Group companies del Credicorp Group; and (iii) managing the solvency of the Credicorp Group.
 - Market Risk Administration Management of BCP: is responsible for (i) managing market risks of the Credicorp Group; (ii) defining the methodologies and developing the models for market risk; and (iii) providing support in market risk management to companies of the Credicorp Group.
 - Direct Insurance Assistant Management of BCP: is responsible for (i) defining Credicorp Group's and the companies of the Credicorp Group's own insurance policies and management standards; (ii) managing Credicorp Group's and the companies of the Credicorp Group's own insurance policies; and (iii) generating the risk management reports required by the various levels of the corporation.
- g) Risk Managements of the Credicorp Group companies:** its main duties and responsibilities are as follows:
- Manage risk in each company.
 - Implement risk management guidelines, policies and methodologies, including as defined on a corporate level.
- h) Business Units and Support Units:** these units are responsible for managing the risks that they generate, including corporate policies and guidelines in their decisions.
- i) Compliance and Audit Units:** the Audit Unit is responsible for i) performing an on-going evaluation of the efficacy and efficiency of Credicorp risk management, verifying compliance with the regulations, policies, objectives and guidelines approved by the Board of Directors; ii) evaluating the sufficiency and degree of integration of Credicorp's data bases and information systems, and iii) guaranteeing independence between risk units duties and business risk units. The Compliance Unit is responsible for ensuring corporate compliance with regulations and the Code of Ethics.

6. Risk Management General Aspects

a) Risk Appetite

Potential losses associated with risks incurred by the Credicorp Group and the Credicorp Group companies in the conduct of their business should be delimited and quantified within a Risk Appetite Framework, defined as the amount and type of risk that an entity can support and wishes to accept in pursuance of its business objectives.

Risk appetite contains quantitative aspects and is directly linked to the global strategy of the entity, including the assessment of business growth opportunities, key markets, liquidity, funding ability and capital. Planning and capital stress exercises complement the Risk Appetite Framework.

In this connection, every company of the Credicorp Group shall define a Risk Appetite Framework in coordination with the Global Risk Management of BCP. Such framework must be approved at the Board of Directors Meeting of Credicorp and at the Board of Directors Meeting of each company of the Credicorp Group.

b) Corporate Governance

- Corporate Risk Committees System:

Risk control and management are conducted in a comprehensive manner through the interaction between risk committees of the companies of the Credicorp Group and the corporate risk committees.

Corporate risk committees operate as follows: (i) a committee assesses and approves strategic and supervision matters in the Credicorp Group: Grupo Credito Risk Committee; and (ii) committees assess and approve tactical matters and monitor management of each risk type.

Because of their nature, some matters may be approved by the risk committees of companies of the Credicorp Group or by corporate committees. The level to approve such matters will depend on the materiality of the matter assessed in terms of risk that the Credicorp Group company takes, where the last level of approval will be the Board of Directors of Grupo Credito.

- **Incentive System**

Companies of the Credicorp Group shall have an incentive system in place to include risk-adjusted performance metrics, which shall adjust to the guidelines defined at the Grupo Credito Risk Committee and the comments made by the CRO of Credicorp.

c) Corporate Policies

The CRO of Credicorp is responsible for designing and proposing to the Grupo Credito Risk Committee the approval of corporate policies of the risks it manages, which shall apply in all companies of the Credicorp Group. Furthermore, it is also responsible for ensuring the implementation of the corporate policies of the companies of the Credicorp Group.

The Risk Units in companies of the Credicorp Group shall bring their internal policies into consistency with the corporate risk policies that they manage, in accordance with their particular characteristics (including, but not limited to, country, regulation, complexity, size, products, and market).

d) Methodological Standards

The CRO of Credicorp is in charge of defining the methodological standards based on the best industry practices, which are required for measurement, treatment and monitoring of risks to which companies of the Credicorp Group are exposed.

Risk units of the Credicorp Group companies shall implement the corporate methodological standards, in consistency with their particular characteristics (including, but not limited to, country, regulation, complexity, size, products, and market).

e) Reporting System

Risk units of the Credicorp Group companies shall periodically report the exposure to its main risks as defined by the CRO of Credicorp.

Units conducting corporate risk activities shall periodically monitor the risks assigned to them from a corporate viewpoint.

SECTION 6: COMPLIANCE

General Policies

1. Introduction

Credicorp is subject to a broad gamut of legal and regulatory norms that have been issued in the countries in which the Company operates. To ensure adequate compliance of a broad, complex and continuously evolving legal framework, the Board of Directors considered appropriate the creation of a Compliance function.

This document, which is based on the regulations of the Peruvian Banking, Insurance and Private Pension Funds Superintendence (SBS) and international best practices, is intended to define the general policies that serve as the framework and guidelines for the process to implement a comprehensive Corporate Compliance Program.

2. General Policies Declaration

To contribute to strengthen the compliance culture of the Corporation and develop a framework that promotes understanding of and compliance with laws, legal provisions and regulations applicable to the Corporation; and, to prevent, detect and correct the activities contrary to compliance with the applicable regulations, the policy of Credicorp and its subsidiaries and affiliates is that:

- a) The Board of Directors of Grupo Credito and Senior Management will supervise compliance risk management to ensure that these policies are implemented correctly throughout the Corporation and evaluate management's performance in this area;
- b) All directors, executives, employees and suppliers must comply with the laws, regulations and government requirements applicable to business conducted both in Peru and in other jurisdictions where the Corporation operates, acting with honesty and integrity as described in Credicorp's Corporate Compliance Manual, Credicorp's Code of Ethics, Credicorp's Corporate Ethics and Conduct Policy, the Anti-Money Laundering and Financing of Terrorism Manual, and other internal documents relative to compliance;
- c) The Board of Directors will appoint a Corporate Compliance Officer who will have the resources necessary to guarantee compliance with regulations and the implementation of the Corporate Compliance Program according to the laws and legal provisions in each country and, if required, other Compliance Officers may be appointed;
- d) The Compliance Division of Credicorp will adequately identify the businesses, products areas and/or processes that are most exposed to compliance risk and ensure the implementation of efficacious mechanisms and controls to mitigate risks;
- e) The Compliance Division of Credicorp, in conjunction with the Management, will strengthen the compliance culture by ongoing communication and a training program for Credicorp collaborators that covers the initial and permanent training in the principles, policies and standards for compliance that are described in Credicorp's Corporate Compliance Manual, Credicorp's Code of Ethics, Credicorp's Corporate Ethics and Conduct Policy; the Anti-Money Laundering and Financing of Terrorism Manual; and other aspects of the Corporate Compliance Program;
- f) The Compliance Division of Credicorp will constantly monitor compliance with the laws, regulations and government requirements applicable to the Company's businesses by identifying, investigating, notifying and penalizing collaborators who fail to comply with the rules, policies and/or procedures, put Company at risk or go against the rules established in Credicorp's Corporate Compliance

Manual, Credicorp's Code of Ethics, Credicorp's Corporate Ethics and Conduct Policy; the Anti-Money Laundering and Financing of Terrorism Manual; and other internal documents related to compliance;

- g) The Management will not tolerate any reprisal and/or threat against individuals or any Credicorp collaborator who provide information, report suspicious conduct or express any information or genuine concern regarding non-compliance with any regulation, policy and/or procedure applicable to the Corporation;
- h) The Compliance Division of Credicorp and, if required, the Comprehensive Business Security Area (or equivalent are of the companies of the Corporation) the Company's companies), will conduct the pertaining investigations to determine the extent to which an employee is responsible for failing to comply with any law, regulation, policy and/or procedure that puts the Company at risk or goes against the rules established in Credicorp's Corporate Compliance Manual, Credicorp's Code of Ethics, Credicorp's Corporate Ethics and Conduct Policy; the Anti-Money Laundering and Financing of Terrorism Manual;
- i) The Management will designate a Compliance Committee. This Committee will be comprised of the various units of the Corporation, and will supervise and guarantee the proper implementation and development of the Compliance Program;
- j) The Board of Directors of Grupo Credito, or any body thereof with the specific delegation of authority for such purposes, will review the Corporate Compliance Annual Work Program on an annual basis, including the policies and procedures described in Credicorp's Corporate Compliance Manual and the Anti- Money Laundering and Financing of Terrorism Manual, based on the observations made in external and internal audits of the Corporate Compliance Programs, lessons learned and the recommendations received from the members of the Board of Directors of Grupo Credito, Senior Management and the Compliance Committee during the period.

Document Approved by:

Board of Directors of Credicorp, meetings held on 03/28/2012, 12/20//2017, 06/26/2019, 06/03/2020, 06/25/2020, 10/29/2020, 12/17/2020 and 01/28/2021.