

Compliance and Ethics Credicorp

Fiscal Transparency Program (FT)

Corporate Policy on the Common Reporting Standard (CRS)

Publication Date: 13/08/2026

1. Introduction

The Common Reporting Standard (CRS) ¹, was developed by the OECD² together with the G20 countries and in cooperation with the European Union; to facilitate international transparency regarding financial accounts held by taxpayers outside their countries of residence and thereby help prevent international tax evasion.

It is an international standard that entered into force in phases across jurisdictions starting in 2016. Currently, more than 100 jurisdictions participate in the CRS worldwide. Under this standard, jurisdictions that are parties to the Convention on Mutual Administrative Assistance in Tax Matters of the Organization for Economic Co-operation and Development must implement the CRS within their legal frameworks, requiring Financial Institutions to identify, perform due diligence on, and report relevant information on financial accounts held by individuals and legal entities identified as tax residents of reportable jurisdictions. Subsequently, Tax Authorities conduct the Automatic Exchange of Information among participating jurisdictions.

The main risks associated with non-compliance with CRS regulations are as follows:

- Financial and administrative sanctions imposed by local regulators.
- Commercial limitations and barriers to entering transactions with financial counterparties.
- Negative impact on the reputation of the non-compliant financial institution, as well as potential spillover risk to other financial entities within the Credicorp Group.
- Loss of customer trust.

2. Scope

The guidelines set forth in this document establish the general framework for the application and control of CRS requirements at Credicorp. They have been designed to mitigate risks and ensure that the Group's companies comply with the requirements applicable in the countries where they conduct financial business.

2.1 Credicorp Companies within Scope

CRS regulations apply to all companies within the Credicorp Group that qualify as Financial Institutions or Foreign Financial Institutions subject to reporting (FI³ or FFI), pursuant to the definitions established by the OECD and/or the local regulators of each jurisdiction.

It includes companies that provide the following products and/or services:

¹ CRS – Common Reporting Standard

² OECD (Organization for Economic Cooperation and Development)

³ FI – Financial Institution / FFI – Foreign Financial Institution

- a. **Deposit accounts:** refers to any business account, checking account, savings account, term deposit account, or any other account represented by certificates of deposit, savings, investment, debt, or any similar instrument that a Financial Institution provides to its customers in the ordinary course of its business. It also includes capital held by an insurance company to secure the payment of or credit interest under investment contracts or similar arrangements,
- b. **Custodial accounts:** refers to any account (other than an insurance contract, cash value insurance contract, or annuity contract) in which one or more financial assets (such as equities, fixed income instruments, derivatives, etc.) are held for the benefit of a third party.
- c. **Equity interests:** refers to direct or indirect interests in companies, investment entities (funds, trusts, etc.), holding entities, financial institutions, or debt instruments issued by any of the foregoing. In the case of mutual funds and investment funds, the reference to equity or debt interests relates to the managed fund itself and not to the Fund Management Company. Any equity or debt interest in an investment entity is excluded solely by virtue of: (i) providing investment advice to a client and acting on their behalf, or (ii) managing portfolios for a client and acting in their name for the purpose of investing, managing, or administering financial assets held in the client's name with a financial institution other than that entity. In the case of trusts, the person holding the interest in the trust may be a settlor, trustee, beneficiary, or any other person exercising control over the trust.
- d. **Cash value insurance contract or annuity contract:** refers to cash value insurance contracts and annuity contracts issued or maintained by a financial institution. These are distinct from immediate, non-transferable, non-investment-linked annuities issued to an individual that monetizes a pension or disability benefit, and that are associated with an account identified as an excluded account.

Credicorp companies within this scope must follow a process to align with the guidelines set forth in this document, in accordance with their specific characteristics (country, type of company, type of products, services and channels, type of clients, market, among others). Likewise, they must ensure that all their activities are conducted in compliance with this document.

As of the publication date of this policy,⁴ Financial Institutions and Foreign Financial Institutions⁵ within the Credicorp Group that fall within the scope of CRS regulations are as follows:

Local entities (Peru):

- Banco de Crédito del Perú.
- Credicorp Capital Sociedad Agente de Bolsa S.A.
- Credicorp Capital S.A. Sociedad Administradora de Fondos.
- Credicorp Capital Sociedad Titulizadora S.A.
- Credicorp Capital Servicios Financieros S.A.
- Grupo Crédito S.A.
- Mibanco - Banco de la Microempresa S.A.
- Pacífico.

⁴ This list is subject to changes and may be expanded to include new entities that may be created or formed as a result of mergers, acquisitions, and/or similar processes, as well as existing entities within the Credicorp Group that may qualify as FIs due to their activities or business line.

⁵ It includes trusts, fiduciary estates, funds, investment vehicles, and other vehicles managed by each of the companies.

- Prima AFP S.A.

Foreign subsidiaries and affiliates:

Jurisdiction	Subsidiary
Bahamas	CCR. Inc.
Chile	Credicorp Capital Asset Management S.A Administradora General de Fondos.
Chile	Credicorp Capital Chile S.A.
Chile	Credicorp Capital S.A. Administradora de Inversiones.
Chile	Credicorp Capital S.A. Corredores de Bolsa.
Chile	Tenpo Bank
Colombia	Credicorp Capital Colombia S.A.
Colombia	Credicorp Capital Fiduciaria S.A.
Colombia	Mibanco- Banco de la Microempresa de Colombia
Colombia	Credicorp Capital Corporación Financiera S. A
Cayman Islands	Credicorp Capital Global SPC.
Cayman Islands	Credicorp Capital Mutual Funds SPC.
Cayman Islands	Atlantic Heritage SPC
Cayman Islands	Atlantic Placement Pool SPC
Cayman Islands	Atlantic Structured Products SPC
Luxembourg	Credicorp Capital Asset Management Fund.
Panama	ASB Bank Corp.
Panama	Banco de Crédito del Perú –Panama Branch.
Panama	Atlantic Security International Financial Services

For providing further details on the application of this policy, CRS Guidelines will be issued for each jurisdiction, covering the most relevant aspects for implementation and/or maintenance.

2.2 Current regulatory frameworks

The CRS regulatory framework applicable to Credicorp Financial Institutions will vary depending on their geographic location. Although the regulation is broadly similar across all jurisdictions, there are notable differences in certain aspects, particularly regarding the deadlines for classifying clients as new or preexisting and for performing due diligence procedures.

As of the publication date of this policy, among all jurisdictions where Credicorp Financial Institutions are located, there are two exceptions with respect to CRS: Bolivia and the United States. Bolivia has not adopted a regulatory framework establishing its adherence to CRS, and the United States is not part of the participating jurisdictions because the competent authority considers that it can achieve the same tax transparency objectives through the Foreign Account Tax Compliance Act (FATCA).

3. General Objectives

The objectives of this policy are as follows:

- a) To establish general guidelines to be followed by Credicorp Financial Institutions for the proper application, adequate implementation, and maintenance of CRS requirements, with respect to the management of financial counterparties, client management, and the treatment of reportable financial accounts.
- b) To ensure that Credicorp Financial Institutions comply with all CRS requirements regarding the identification, due diligence, and reporting of financial accounts of customers impacted by the regulation.
- c) To establish appropriate mechanisms that enable the collection of relevant customer information to comply with CRS requirements.

4. Definitions

- a) **Reportable Client:** means any individual or legal entity that is a tax resident of a reportable jurisdiction, in accordance with the tax laws of that jurisdiction.
- b) **Counterparties:** These are all entities or third parties through which investment operations are conducted, transactions impacted by CRS, and/or transactions related to CRS-impacted products (e.g., banks, correspondent banks, brokers, stock brokerage firms, custodians, among others). In general, they are entities whose primary activity is to conduct CRS-impacted transactions, either through the acquisition of a product or the provision of a service.
- c) **Annuity Contract:** These are contracts under which an issuer agrees to make full or partial payments over a specified period, based on the life expectancy of one or more individuals. They also include contracts that are considered annuity contracts under the laws, regulations, or practices of the jurisdiction in which they are issued, and under which the issuer agrees to make payments over several years. Retirement annuity contracts are excluded.
- d) **Cash Value Insurance Contract:** These are insurance contracts (other than reinsurance contracts for indemnification between two insurance companies) that have a cash value, meaning the policyholder is entitled to receive a cash amount upon surrender or termination of the contract. Excluded are life insurance contracts solely for death benefits, personal injury, or sickness insurance contracts, among others.
- e) **High Value Accounts:** These are preexisting financial accounts held by individuals whose aggregate balance or value (including average and highest monthly balance) exceeds USD 1 million (or its equivalent in local currency) as of December 31 of the year prior to CRS becoming effective, or as of December 31 of any subsequent year.
- f) **Lower Value Accounts:** These are preexisting financial accounts held by individuals whose aggregate balance or value (including average and highest monthly balance) do not exceed USD 1 million (or its equivalent in local currency) as of December 31 of the year prior to the effective date of CRS.
- g) **Custodial Accounts:** These are accounts that invest exclusively in financial instruments with investment components, such as equities, bonds, etc.
- h) **Depository Accounts:** These are monetary accounts held by a customer at a financial institution, such as savings accounts, checking accounts, term deposit accounts, bank certificates, certain insurance policies, funds, securities, among others.

- i) **Financial Account:** These are all accounts maintained by a Financial Institution in the ordinary course of its business, and include custodial accounts, deposit accounts, equity interests, and specific insurance contracts.
- j) **New Accounts:** These are all accounts opened by a Financial Institution on or after the effective date of the CRS regulation.
- k) **Pre-existing Accounts:** These are all accounts maintained by a Financial Institution as of December 31 of the year prior to the effective date of CRS.
- l) **Reportable Accounts:** These are all financial accounts held by reportable individuals, as well as active entities incorporated in foreign jurisdictions and passive entities whose controlling persons qualify as reportable under CRS.
- m) **Exempt Non-Financial Entity:** These are non-financial entities that are excluded from the scope of CRS, such as listed companies, tax-exempt organizations, NGOs, among others.
- n) **Passive Non-Financial Entity:** These are non-financial entities that derive more than 50% of their gross income from passive sources, such as interest, dividends, capital gains, etc., and/or hold more than 50% of their assets for the purpose of generating passive income.
- o) **Related Entity:** Entities are considered related in the following cases: (i) one entity controls another entity; (ii) two or more entities are under common control; or (iii) two investment entities are subject to another entity that fulfills the applicable due diligence obligations for such investment entities. For this purpose, the term “control” includes direct or indirect ownership of more than fifty percent (50%) of an entity’s capital and holding more than fifty percent (50%) of its voting rights.
- p) **Documentary evidence:** These are all valid documents used to support a client’s CRS classification. This includes, but is not limited to: (i) tax residency certificates issued by a government authority of the jurisdiction where the client (individual or entity) declares tax residency; (ii) any official identification document of an individual issued by an authorized governmental body; (iii) any official documentation issued to a legal entity by an authorized governmental body indicating the entity’s legal name, country of incorporation, and principal office address; (iv) financial statements, tax returns, third-party credit reports, settlement agreements, dissolution or bankruptcy court rulings, as well as reports issued by a securities regulatory authority, among others.
- q) **CRS Indicia:** refers to any indication or circumstance that allows one to infer, without direct knowledge, that a given client should be considered a tax resident of a reportable jurisdiction. CRS establishes six indicia: 1) identification of the account holder as a resident of a reportable jurisdiction; 2) current mailing or residential address (including a P.O. box) in a reportable jurisdiction; 3) one or more telephone numbers in a reportable jurisdiction and no telephone number in the country where the account is held; 4) standing instructions to transfer funds (other than with respect to a deposit account) to an account maintained in a reportable jurisdiction; 5) a power of attorney or signatory authority granted to a person with an address in a reportable jurisdiction; and 6) a hold mail instruction or a “in care of”/mailing address in a reportable jurisdiction, where no other address of the account holder is recorded in the Financial Institution’s files.
- r) **Financial Institution - FI:** This refers to any institution whose business activity consists of: 1) accepting deposits as part of its banking or similar business; 2) holding financial assets on behalf of third parties; 3) being engaged in the business of investing, reinvesting, or trading in financial instruments; or 4) being an insurance company that makes payments into a financial account or maintains products with investment components..

- s) **Participating Financial Institution:** This refers to: 1) any Financial Institution incorporated in a Participating Jurisdiction (excluding any branches it may have that are located outside the Participating Jurisdiction); and 2) any branch located in a Participating Jurisdiction, even if its head office is incorporated in a jurisdiction that does not participate in CRS.
- t) **Reportable Jurisdiction:** This refers to any jurisdiction that has signed an agreement to exchange financial account information under the CRS. For due diligence purposes, the tax residency of all clients must be documented, regardless of whether they belong to a reportable jurisdiction; however, information will only be reported for those jurisdictions designated each year by the country's Tax Authority.
- u) **Taxpayer Identification Number - TIN:** This is the generic term used to refer to the identification number assigned by a country's Tax Authority to taxpayers. In Colombia, it is known as the NIT⁶, In Chile, it is known as RUT⁷, in Peru, it is known as RUC⁸ or DNI⁹, etc.
- v) **Corporate Compliance Officer:** This is the person designated and authorized by Credicorp to ensure compliance with CRS obligations across all jurisdictions where the Group operates. The Corporate Compliance Officer may delegate responsibilities to Compliance Officers and/or Heads of Compliance of the Financial Institutions, so they function as CRS responsible officers within their respective companies and jurisdictions.
- w) **Credicorp Compliance Officer and/or Head of Compliance:** This is the person designated by the Corporate Compliance Officer to implement and maintain the management of CRS requirements within the company and jurisdiction under their responsibility. This individual may function as the Point of Contact (POC) with the local Tax Authority for CRS purposes or may delegate this function to a member of their team.
- x) **Equity Interest:** This primarily includes collective investment vehicles such as investment funds, mutual funds, trusts, autonomous estates, and others, where participants are entitled to receive the benefits derived from the investments.
- y) **Controlling Person:** This refers to any individual who exercises effective control over an entity. It includes partners, shareholders, beneficial owners, and substantial owners of the entity who directly or indirectly hold a percentage greater than or equal to 10% of the shares/interests of a legal entity or investment vehicle. The ownership threshold may vary across countries to align with local Anti-Money Laundering (AML) regulations¹⁰ or the Beneficial Ownership regulation, which requires the identification of controlling persons under stricter thresholds.
- z) **Point of Contact - POC:** This is the person designated to manage communications and the implementation of the CRS program of a Financial Institution with the Tax Authorities of the jurisdiction. In Credicorp Financial Institutions, POCs are the Compliance Officers and/or Heads of Compliance of the companies, or members of their teams designated by them to fulfill this role within their respective companies.

⁶ NIT - Tax Identification Number

⁷ RUT - Unique Taxpayer Roll

⁸ RUC - Single Taxpayer Registry

⁹ DNI – National Document of Identification

¹⁰ AML – Anti Money Laundering

- aa) **Account Holder:** This refers to any person registered or identified by the Financial Institution as responsible for the accounts opened with the Institution. It does not include persons who are listed as holders on behalf of or for the account of another individual or legal entity, such as legal representatives, custodians, signatories, financial advisors, etc. The account holder is always the individual or legal entity that is the beneficial owner of the account. In the case of a cash value insurance contract or an annuity contract, the account holder is the person who can access the cash value or change the beneficiary of the contract. If no person can access the cash value or change the beneficiary, the account holder is any person named as the owner of the contract and any person entitled to receive a payment under the contract. Upon maturity of a cash value insurance contract or annuity contract, each person entitled to receive a payment under the contract is considered an account holder. For joint accounts, all joint holders must be treated as account holders. In trusts, both settlors and beneficiaries must be treated as account holders.

5. Responsibilities

The Directors, Managers, the Corporate Compliance Officer, and their representatives, as well as employees of Credicorp companies, shall have the following responsibilities:

a) Directors of Credicorp companies:

- To consider the impact of the CRS Policy on strategic business decisions.
- To ensure the adoption and compliance of the CRS Policy across all Credicorp entities.

b) Managers of Credicorp companies:

- To establish the necessary measures to ensure that employees under their responsibility are aware of and comply with the CRS Policy.
- To ensure that all internal policies and procedures related to CRS regulations are aligned with this corporate policy.
- To ensure that employees directly or indirectly involved in the implementation of CRS are adequately trained regarding regulatory requirements and responsibilities, such as client identification, due diligence, client classification, annual reporting, and controls over new and existing channels, products, and services, among others.

c) Corporate Compliance Officer and representatives in Credicorp companies:

- The Corporate Compliance Officer, in coordination with the Compliance Officers and/or Heads of Compliance and the POCs of each company, shall ensure that the Work Plan activities are executed and that the annual CRS reports are submitted to the corresponding Tax Authority within the deadlines and terms established for each jurisdiction.
- To ensure that periodic monitoring activities are conducted to verify compliance with the CRS Policy and to apply any applicable disciplinary measures.
- To request any exceptions to this policy in accordance with Section 8 of this document.
- To determine the effectiveness of the internal CRS policies and procedures implemented within their financial institution, as well as the level of alignment with this policy. Alignment shall be measured based on program health, in accordance with the guidelines established by the Head of the Fiscal Transparency Program.

d) Business Officer, Investment Advisor, and/or equivalent roles in Credicorp companies:

- To perform customer due diligence activities to identify indicia, as well as to detect changes in circumstances and communicate them to the Compliance Officers in each company.
- To obtain the information required under CRS regulations, as applicable in each jurisdiction and entity.

e) Employees:

- Any employee of a Credicorp company who becomes aware of non-compliance with this policy is required to report it to their immediate supervisor and/or the Corporate Compliance Officer, through the communication channels of the Compliance Units of each subsidiary, or via corporate email cumplimientofatcacrs@bcp.com.pe or through the Credicorp Whistleblowing System EthicsPoint - Alerta GenÉTICA Credicorp

6. General Considerations

- a) For the application of this policy, Credicorp Financial Institutions must consider the requirements of the local Tax Authority and the regulatory framework of their respective jurisdictions.
- b) The Corporate Compliance Officer and the Corporate Compliance and Ethics Division Management may establish additional controls beyond those indicated in this policy for certain business units or Credicorp companies, applying a risk-based approach.
- c) If Credicorp Financial Institutions outsource any CRS-impacted functions, third parties must comply with regulatory requirements and with this policy. Such requirements must be included in contracts and service level agreements to ensure proper implementation. However, any Credicorp company that delegates CRS reporting and/or due diligence functions shall retain responsibility for compliance with such obligations.
- d) It is not possible to cover all cases or specific situations that may arise within this policy; therefore, it is important to ensure that the principles and intent of the policy prevail in any situation, and that they are complemented by consultations and reference to the OECD "Standard for Automatic Exchange of Financial Account Information," as well as applicable local and international legislation related to this standard.

7. Policy Application

7.1 CRS Governance

- a) The Credicorp Corporate Compliance Officer shall designate the Compliance Officers and/or Heads of Compliance of Credicorp Financial Institutions to be responsible for the implementation and maintenance of this Policy within their respective companies. Each local Compliance Officer and/or Head of Compliance shall assume the role of POC or shall appoint the person(s) within their team responsible for fulfilling this function.
- b) The Credicorp Corporate Compliance Officer shall appoint a Program Head to develop strategies and prepare the work plan for compliance with CRS requirements at BCP Peru, and to provide guidelines for local and foreign subsidiaries/affiliates.
- c) The Credicorp Corporate Compliance Officer shall ensure compliance with the CRS Policy across Credicorp companies and shall periodically monitor that they comply with the requirements of this Policy and any procedures derived from it.

- d) Credicorp Financial Institutions must implement CRS requirements applying a risk-based approach, considering available resources, capabilities, and the impact on each of the companies.

7.2 New companies, mergers, and acquisitions

- a) The Corporate Compliance Officer shall ensure and centralize the assessment and diagnosis of CRS implementation in any new legal entity incorporated through creation, merger, acquisition, and/or similar processes.
- b) Prior to submitting a binding offer in the context of a process involving the creation, merger, and/or acquisition of a legal entity or an investment vehicle, the following actions must be taken:
- The General Management, or the unit it delegates, shall inform the Corporate Compliance and Ethics Division about the creation, merger, and/or acquisition process, so that it may issue an opinion on the application of appropriate CRS due diligence on the target entity.
 - The local Compliance Officer and/or Head of Compliance of the Credicorp company participating in the creation/acquisition process shall verify whether the new company is in a CRS jurisdiction and confirm whether it has implemented the regulatory requirements, to avoid future contingencies.

7.3 Management and onboarding of counterparties

- a) Credicorp Financial Institutions shall apply requirements like customer identification requirements to all Financial Counterparties with which they seek to establish business relationships. The required documentation may vary depending on the regulatory requirements of each jurisdiction.
- b) Each Credicorp Financial Institution must maintain a database of its Financial Counterparties with updated information and supporting documentation evidence that appropriate CRS due diligence has been performed.

7.4 Client management and onboarding

The CRS regulatory requirements apply to all clients who acquire passive products and/or products with investment components, and such clients must identify their CRS status at the time of onboarding. Only clients identified as tax residents of reportable jurisdictions will be included in the Annual Report submitted to the local Tax Authority (including individuals residing in CRS jurisdictions, active entities incorporated in CRS jurisdictions, and passive entities with controlling persons who are tax residents in reportable jurisdictions).

- a) No employee of Credicorp companies may advise or provide guidance to clients regarding their CRS classification or status, or on any mechanisms for evading and/or circumventing CRS requirements.
- b) No employee of Credicorp companies may alter and/or conceal evidence of indicia or changes in a client's circumstances to modify their CRS classification.
- c) Clients are responsible for providing the CRS information required to determine their tax residency. No employee of Credicorp companies may omit this request or record information on behalf of clients.

- d) Credicorp companies must maintain the information and documentation necessary to support a client's classification in relation to CRS obligations, whenever required by internal or external audits or reviews by local and/or international regulators related to regulatory compliance.
- e) In cases involving the onboarding of account holders' representatives in investment accounts who have unlimited control over such accounts, enhanced due diligence must be applied to ensure a deeper understanding of both the account holder and the representative managing the accounts.
- f) Where a client does not wish to provide information regarding their CRS classification, the Credicorp Financial Institution may not proceed with the onboarding process for passive products until the client provides the supporting documentation required to determine their tax residency, including a declaration and/or self-certification.

7.5 Customer Due Diligence

- a) Credicorp companies must comply with the CRS due diligence processes within the timelines and conditions defined by the regulations of each jurisdiction.
- b) Credicorp companies may not rely on CRS declarations/self-certifications or documentary evidence when they know or have reason to believe that such information is incorrect or unreliable. In this regard, they must consider consistency with the information obtained at account opening (including customer due diligence information collected under Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) regulations). In cases where inconsistencies with CRS information are identified, the client must be contacted to resolve them.

In cases where it is not possible to obtain the CRS declaration/self-certification or equivalent legal document at the time of account opening, the Credicorp Financial Institution may grant a reasonable period for its subsequent submission and verification; however, the entity may decide not to grant such period in cases where it does not have mechanisms in place to ensure that the client will subsequently provide the required documentation.

- c) Credicorp companies must have adequate reporting mechanisms in place to identify changes in clients' circumstances and to determine whether such changes give rise to indicia that would cause clients to be considered reportable persons or entities.
- d) The Compliance Officers and/or Heads of Compliance of Credicorp companies must report to the Corporate Compliance Officer any deficiencies or non-compliance identified in the due diligence processes.
- e) CRS due diligence does not replace the requirements established under the Foreign Account Tax Compliance Act (FATCA), Beneficial Ownership regulations, or Anti-Money Laundering and Counter-Terrorist Financing regulations.

7.6 Clients who do not provide information

- a) New or pre-existing clients with indicia of being reportable persons or entities who fail to provide supporting documentation to confirm or refute such indicia shall be classified as reportable for each jurisdiction for which indicia were identified, in accordance with applicable local CRS regulations.

7.7 Requirements for Business Officers and other relationship managers ¹¹

- a) Compliance with CRS due diligence requirements related to the customer is the responsibility of the Business Officer, Investment Advisor, and/or their equivalent roles in Credicorp companies.
- b) Business Officers, Investment Advisors, and/or their equivalent roles in Credicorp companies **must** inform the Credicorp Corporate Compliance Officer or their representatives if they become aware of any information or indicia that their clients may qualify as reportable persons or entities, as well as passive entities with reportable controlling persons.
- c) Business Officers, Investment Advisors, and/or their equivalent roles in Credicorp companies must keep updated the relevant information and documentation required to determine their clients' CRS classification, and make it available whenever required for controls, audits, monitoring, and other related processes.
- d) If a Business Officer, Investment Advisor, and/or their equivalent role in Credicorp companies becomes aware that an update of client information and/or a change in circumstances has generated indicia that the client may be considered a reportable person or entity, they must report it to the Compliance Unit of their company. The knowledge of the Business Officer, Investment Advisor, and/or equivalent regarding whether a client qualifies as reportable shall be decisive for the classification of such client as reportable.
- e) Business Officers, Investment Advisors, and/or their equivalent roles in Credicorp companies must provide a periodic declaration certifying the following:
 - They remain up to date with their responsibilities related to CRS.
 - They have not provided any form of CRS-related advice to clients.
 - They have complied with the obligation to inform the local Compliance team of any indicia or relevant information regarding clients in their portfolio, such as: (i) that the account holder is not the beneficial owner of the funds and such arrangement is being used to evade the identification and CRS classification of a reportable person or entity; (ii) that the controlling persons of a passive legal entity have not been properly identified, in order to prevent the correct CRS identification and classification of the client.

7.8 Reporting to the Local Tax Authority

- a) Credicorp Financial Institutions must submit the annual reports required under CRS to the local Tax Authority within the established deadlines and in accordance with the mechanisms implemented by the regulator of each jurisdiction.
- b) Credicorp companies subject to CRS shall report on clients' personal and financial information as recorded in any of the following documents: (i) Tax Residency Self-Declaration, (ii) CRS Self-Certification, (iii) other documents valid in the relevant jurisdiction.
- c) Credicorp companies subject to reporting must align their reporting framework with the specifications and conditions established by the local Tax Authority.
- d) Credicorp companies subject to reporting must perform validations prior to submitting reports to the local Tax Authority to ensure the quality of the information contained therein, to avoid contingencies and any impact that could lead to a loss of client trust.

¹¹ Includes Business Advisors, Brokerage Advisors, Wealth Advisors, and/or equivalent roles within Credicorp companies.

7.9 Products and Channels

- a) Whenever new channels, products, or services are developed, or existing ones are modified, a CRS assessment must be conducted to identify the level of risk and impact of this regulation. The Compliance Officers and/or Heads of Compliance shall conduct this assessment with each Credicorp company.
- b) Each Credicorp company is responsible for establishing the necessary controls to perform this analysis during the process of creating or modifying channels, products, and services, as well as for maintaining evidence of the evaluations conducted.
- c) Credicorp Financial Institutions must maintain a record of channels, services, and products impacted by CRS, including information related to the implemented controls, which must be periodically updated.

7.10 Internal Certifications

- a) The Compliance Officers and/or Heads of Compliance of Credicorp Financial Institutions must conduct periodic reviews to identify opportunities for improvement in complying with CRS requirements within their respective companies. These reviews may be conducted internally or with the participation of external consultants/reviewers.
- b) Each year, the Compliance Officers and/or Heads of Compliance of Credicorp Financial Institutions must certify to the Corporate Compliance Officer that all actions set out in the work plan to comply with CRS requirements have been completed within their respective companies.

8. Exceptions

Exceptions to any provision of this policy must be duly justified and submitted for evaluation and approval to the Credicorp Corporate Compliance Officer.

- a) The Credicorp Corporate Compliance Officer shall decide, if necessary, to escalate any request to the Credicorp Board of Directors for approval.
- b) In the case of Financial Institutions incorporated in jurisdictions that have local regulations for the application of the Common Reporting Standard (CRS), the requirements and provisions issued by the country's Tax Authorities shall prevail.

9. Disciplinary Measures

Violations of this policy or failure to cooperate with an internal investigation may result in the application of disciplinary measures, depending on the severity of the case. Such measures may include termination of employment and dismissal of the employee, in accordance with labor laws, without prejudice to any applicable civil and criminal actions.

Approved by:
Credicorp Board of Directors in session dated 12/21/2023 and 07/2026
Corporate Compliance and Ethics Division Management