

**COMPLAINT SYSTEM**

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## 1. INTRODUCTION

The internationally established standards for effective corporate governance require companies to establish procedures that enable staff to submit complaints to the Audit Committee regarding fraud or irregularities about accounting, financial and/or administrative issues, guaranteeing the protection of the person submitting the complaint.

As a result, Credicorp has implemented this policy, establishing the guidelines and procedures to report and resolve those complaints, through a Complaint System (the "System") that is applicable to all employees of Credicorp and its subsidiaries (hereafter the "Corporation").

## 2. CREDICORP COMPLAINT SYSTEM

### 2.1. Definition

The System is defined collectively as the policies, procedures and tools, that integrated, allow proper receipt and administration of complaints of activities that violate financial ethical principles as well as practices, procedures and policies established by Credicorp, that directly relate to accounting, finance and administration of the Corporation.

The main objective of the System is to identify issues related to fraud or irregularities in accounting, financial and / or administrative areas and noncompliance with the Code of Ethics, the Credicorp Conduct Guidelines, and the Corporate Compliance Manual. The System comprises: (i) the development of necessary investigations to validate the complaint made through the System and, (ii) confirm these allegations, sanction, and impose corrective actions.

The System provides a means to receive complaints based on reasonable suspicions made by any employee of Credicorp and its subsidiaries.

### 2.2. Management of Credicorp's Complaint System

The Credicorp Audit Committee (the "Audit Committee") is responsible for the proper operation of the System.

The Audit Committee has designated the Compliance Manager of Banco de Crédito Del Peru BCP as Operator (hereafter the "Operator") of the System. This Manager will develop the infrastructure necessary to comply with the norms of this policy.

Operator responsibilities are:

- Advise Corporation staff on any matter related to the System.
- Receive complaints from any of the channels established in this policy, maintaining the confidentiality of the complaint and the complainant's identity.
- Perform tests of the Complaint System.
- Register and safeguard the information, documentation and/or any evidence related to the complaint, to be used in the investigation process.
- Review the complaints received and according to their nature, submit e them to the BCP Security and Fraud Prevention Area, to the BCP Management Division of Human Resources or other units of the Corporation, so they can conduct the respective investigations.
- Report to the Audit Committee twice a year:
  - The new complaints received since the last Audit Committee indicating the status of the investigations.

- The status of complaints received previously, indicating the results of the investigations for the completed cases.

### **2.3. Submit a Complaint**

In the Credicorp website ([www.credicorpnet.com](http://www.credicorpnet.com)), there's an option called 'Sistema de Denuncias / Complaint System', the same as it is on the home page or on the link "Corporate Governance" which allows Corporation staff to register their complaints anonymously if they choose. The Operator may subcontract IT systems or well-known international IT programmers without limiting his responsibility.

The System will send an email addressed to the Audit Committee (through the Operator), with the submitted complaint.

The e-mails will be saved in a mailbox that can only be accessed by the System Operator; who will have the responsibility to present them to the Audit Committee.

This option is available 24 hours a day, 7 days a week.

Anyone who submits a complaint should be aware that he must provide certain information to help initiate the investigation. The information that must be provided when submitting a complaint should include:

- The complaint. This should include the fraudulent actions, illegal, improper, and non-compliant practices as understood by the complainant, that directly affect financial and accounting areas, audit functions and / or regulatory reports, the Code of Ethics, Credicorp Conduct Guidelines and the Corporate Compliance Manual.
- The name, job title and subsidiary where employees involved in the complaint are working.
- Date and manner in which the activity in question was identified and reported.
- Data, documents or any type of instrument that can be used as evidence or reasonable indication of the occurrence of the event to support the complaint. .
- An overview, if the identified situation is an isolated or recurrent matter.
- Indicate if you consider there are others involved, especially if they are supervisors or managers with responsibilities in the area.

In addition to the required information the complainant may report, if desired, the names of the people with whom he has discussed the complaint(for example, immediate superior, the Management and Human Resources Area, co-workers, etc.) and the response obtained by this person.

### **2.4. Complaint System Policies**

#### **a. Confidentiality**

When registering the complaint, the complainant's identity is not required. If the complainant wants to identify himself, the Audit Committee and the Operator will maintain absolute confidentiality about his identity.

Credicorp guarantees the confidentiality and anonymity of those involved, particularly the complainant. Also, it guarantees to safeguard the particular information associated with the complaint; and this information remaining the exclusive knowledge and use of the Operator, the area who heads the investigation, and the Audit Committee.

b. Protection

The Corporation guarantees the protection of the complainant against reprisal or any other form of discrimination or intimidation as a result of submitting the complaint or claim, unless it is irrefutably proven, that the complaint was made in bad faith.

c. Register and filed information

All complaints received through the Complaints System must be:

- Registered by the Operator.
- Properly classified during the stage of investigation and resolution.
- Filed and maintained in a restricted environment with access limited to the Audit Committee and the Operator.

d. Reports

In order to ensure effective communication and clear and consistent submission of information by the Operator to the Audit Committee, the Operator will submit a report summarizing the status of the complaints received.

e. Final considerations

Channels of communication have been created to protect employees' rights; therefore, their use should be consistent with the standards set by the Corporation's Code of Ethics.

The Operator will treat each complaint with the utmost concern and care, guaranteeing an efficient and effective investigation and resolution to the complaints.

### **3. RESOLUTION, CORRECTIVE MEASURES AND SANCTIONS ON COMPLAINTS**

The Operator shall report to the Audit Committee the conclusions of the investigations.

The Audit Committee is responsible for resolving complaints based on the Investigation Report and additional actions it deems appropriate, implement corrective measures and sanctions to be applied, which may result in the separation of complainant's duties, notwithstanding the civil and criminal actions that may occur.