

Credicorp Compliance and Ethics

Anti-Corruption Program

Corporate Policy for the Prevention of Corruption and Bribery – Credicorp

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1. Purpose

This Policy aims to identify and address risks to which Credicorp and its subsidiaries (hereinafter “Credicorp”) may be exposed in relation to acts of corruption and bribery, and to provide Credicorp Representatives with tools and support to prevent, detect, and combat corruption.

2. Glossary of Terms

- a) **Senior Management:** All members of the Board of Directors, the Chief Executive Officer (CEO), and their direct managerial reports within Credicorp.
- b) **Political Candidate:** Any individual who is the legal representative of a political party, a member of the party's executive committee, and/or a candidate for any elected public office.
- c) **Due Diligence:** Knowledge that must be obtained about an external counterparty in order to understand its specific corruption-related risks at a given time and within a particular operational context (e.g., a new project, client, supplier, or employee), as well as the measures needed to prevent and mitigate those risks.
- d) **Prevention Model Officer:** The individual appointed by the Board of Directors of the Credicorp company to implement and maintain the prevention model. This person may hold a corporate or local role.
- e) **Public Official:** Any individual who holds a position (as civil servant, elected official, full- or part-time employee, representative, etc.) in a government or government department or instrumentality (including state-owned enterprises) or in a political party, or who has held such a position within the last five years.
- f) **Public Official with Decision-Making Authority:** A Public Official who, in the performance of their duties, is empowered and required to make public decisions.
- g) **Interest Management:** Oral or written communication, through any means, addressed to a Public Official with Decision-Making Authority, with the intent of influencing a decision.
- h) **Stakeholders:** Shareholders, clients, partners, suppliers, employees, and other interested parties of Credicorp.
- i) **Representatives:** All directors, employees, and Third Parties representing Credicorp.
- j) **Third Party:** Any natural or legal person external to Credicorp. This category includes clients, suppliers, correspondent banks, business partners, commercial partners, job applicants to positions at Credicorp, among others.

3. Summary

Credicorp is a leading regional financial institution, well-recognized in the countries where it operates. As such, its success and long-term sustainability rely largely on the trust it has built over the years with its Stakeholders.

Through Credicorp's GenÉTICA¹, the organization is committed to taking its collaboration with each Stakeholder to the next level and building long-term relationships based on trust. This commitment means that Credicorp **does not tolerate** any act of corruption or bribery to obtain or retain business, secure any undue advantage, or improperly influence the decisions of any person, including Representatives, Third Parties, and Public Officials.

4. Applicable Laws and Scope

Credicorp is subject to local anti-corruption and conflict of interest (revolving door) laws in the countries where it operates. These laws relate to both public and private corruption and may impose corporate and/or individual liability. Additionally, Credicorp is subject to the U.S. Foreign Corrupt Practices Act (FCPA²). It is the responsibility of Credicorp Representatives to comply with these laws.

Credicorp expects all of its Representatives to comply with these laws and with the entirety of this Policy.

5. Commitment of Senior Management

Senior Management is fully committed to the fight against corruption. They approve this Policy and provide the financial, human, and technological resources necessary for Credicorp companies to implement anti-corruption prevention models. They oversee the effective implementation and operation of the model, with reasonable frequency.

Senior Management fosters a culture of zero tolerance for corruption and bribery across all of Credicorp's business operations.

6. Guidelines

6.1 Total Prohibition of Acts of Corruption and Bribery

Credicorp Representatives may not and shall not offer, promise, give, solicit, authorize, or receive any payment or thing of value to obtain, retain, or secure any undue benefit for Credicorp, for themselves, or for Third Parties. This prohibition applies not only to money but also to business opportunities, employment, loans, gifts, travel, entertainment, and charitable donations, among other things.

While bribery is prohibited in all circumstances, there are certain situations that pose higher risk, and in such cases, Representatives must exercise particular caution and appropriate due diligence.

Each Credicorp subsidiary or team has the authority to establish additional guidelines that are more restrictive than those set forth in this Policy, subject to prior consultation with Corporate Compliance.

6.1.1 Hospitality and Gifts Provided by Credicorp Representatives

- a) Meals, gifts, travel, and other forms of hospitality extended to clients, suppliers, Political Candidates, and other (private) Third Parties are permitted, provided that they:
 - Involve a legitimate business purpose;
 - Do not contravene local regulations or the third party's anti-corruption policies;
 - Are not offered with the intent of obtaining favorable or undue treatment for Credicorp and/or its Representatives.
- b) Credicorp sets a limit of USD \$100.00 per gift or hospitality event (excluding travel, for which internal guidelines apply).
- c) Meals, gifts, travel, and other forms of hospitality extended to Public Officials are strictly prohibited.

¹ New Credicorp Code of Ethics: <https://www.grupocredicorp.com/assets/pdf/CodigodeEticaCredicorp.pdf>

² Foreign Corrupt Practices Act: <https://www.justice.gov/criminal-fraud/foreign-corrupt-practices-act>

6.1.2 Hospitality and Gifts Received by Credicorp Representatives

- a) Meals, gifts, travel, and other forms of hospitality offered by clients, suppliers, or other Third Parties to Credicorp Representatives are permitted, provided that they:
 - Are directly related, proportionate, and timely to the maintenance of a transparent relationship;
 - Are not accepted with the intent to unduly influence the Representative's decision; and
 - Are offered solely to the Credicorp Representative and never to a Representative's related party.
- b) Credicorp sets a limit of USD \$100.00 per gift or hospitality event (excluding travel, for which internal guidelines apply). Each Representative is responsible for properly recording and timely reporting such events to the appropriate party.
- c) Receiving gifts in cash, gift cards, vouchers, debit cards, or any equivalent is strictly prohibited.
- d) Any invitation to attend an event, conference, course, training session, or business visit in another city or country must have prior approval from the immediate supervisor and the Local Compliance team and must comply with the specific guidelines established by each Credicorp company for such purposes.

6.1.3 Interest Management

- a) Representatives engaging in Interest Management activities must comply with local regulations governing such matters.
- b) Providing gifts, hospitality, donations, or any item of value or benefit to Public Officials with Decision-Making Authority is strictly prohibited.
- c) Any meeting with a Public Official with Decision-Making Authority involving Lobbying Management must be held at the public entity's premises and during official working hours.

6.1.4 Donations

- a) Community support contributions (donations) are permitted, provided they are not made with the intention of obtaining an improper advantage for Credicorp. These donations must be made for legitimate purposes, such as addressing humanitarian needs or supporting cultural institutions, and must always be for the benefit the community.
- b) Donations from Credicorp to public entities (or entities related to Public Officials) must be reviewed and approved in advance by the Local Compliance team. This requirement also applies to contributions or donations made on a personal basis by members of Senior Management of any Credicorp company.
- c) All donations and/or community contributions must comply with the provisions set forth in Credicorp's Corporate Donations Policy, as well as with the specific regulations or procedures established by each Credicorp subsidiary on this matter.

6.1.5 Political Contributions

- a) Political contributions by Credicorp or any of its subsidiaries to political parties are permitted under the following conditions:
 - Local regulations in the country where the company operates allow it;
 - The political party must be formally registered in the official registry of political parties of the country;
 - The contribution must be made directly to a political party. It is not permitted to make contributions or provide benefits to political candidates in a personal capacity, under any form (monetary or non-monetary), whether directly or indirectly;
 - Contributions in cash are not permitted. All contributions must be made through the financial system;

- The monetary value of the contribution must fall within the limits established by the applicable law;
 - The selection of the political party receiving the contribution must follow the guidelines approved by the Board of Directors of both Credicorp and the contributing company;
 - Contributions made must be disclosed to the market.
- b) Any political contribution made by any Credicorp company must be previously reviewed by Corporate Compliance.
- c) Corporate Compliance must prepare a report with the results of its review, and the report must be presented to the General Manager of the company making the political contribution and also shared with the Corporate Affairs Manager and the Corporate Legal Manager. The General Manager must request the corresponding Board of Directors' approval for the political contribution.
- d) Once the political contribution has been approved, it must be reported to the Head of the Credicorp Audit Division, in order to ensure in advance that the accounting adheres to the standards established by the International Financial Reporting Standards (IFRS) and/or local accounting principles, as applicable. The Head of the Credicorp Audit Division shall report to the Credicorp Audit Committee on the political contributions made.
- e) Political contributions made in a personal capacity by members of the Senior Management of Credicorp or its subsidiaries require advance review and approval by the relevant Local Compliance Unit.

6.1.6 Engagement with Third Parties

- a) Third Parties help maintain business stability and support the building of trust with our Stakeholders. Credicorp only engages with Third Parties that uphold a reputable image and demonstrate integrity. Credicorp Representatives must not overlook any red flags or warning signs related to ethics or integrity when dealing with Third Parties.
- b) Each Credicorp Representative is responsible for conducting Due Diligence (including a background check) on the Third Party before engaging in any business or contractual relationship, and must inform their Local Compliance team if they identify any red flags or warning signs that could compromise the integrity of the Third Party or that of Credicorp.
- c) Those Third Parties who, due to the nature of their relationship, represent Credicorp before other Third Parties and are authorized to act on behalf of Credicorp must comply with the provisions set forth in this Policy.

6.1.7 Hiring of Personnel

- a) All personnel hiring within any Credicorp company must follow that company's formal and official recruitment process or policy.
- b) Credicorp does not hire personnel as a form of compensation for favors or bribes made for the benefit of Credicorp.
- c) The hiring of Public Officials and former Public Officials is restricted when the applicant:
- has left the public entity less than 12 months ago; and
 - has made decisions or had access to relevant/confidential information that could have impacted Credicorp.
- d) All hiring of Public Officials and former Public Officials must be reviewed and approved by the Local Compliance team. The Corporate Compliance Officer may request that the case be escalated to the Sustainability Committee for its awareness.

6.1.8 Facilitation Payment

- a) A facilitation payment is understood as a small payment made to a Public Official, usually of lower rank, to expedite or ensure the performance of non-discretionary, routine governmental action.
- b) At Credicorp, all facilitation payments are prohibited.

6.1.9 Mergers and Acquisitions

- a) Due Diligence must be carried out on the company to be acquired (target company), in accordance with Credicorp's Due Diligence guidelines, in order to investigate and determine whether there are any red flags or warning signs indicating the possibility that the company or any of its representatives may have made or offered illegal payments or taken other unlawful actions to obtain benefits.
- b) The Local or Corporate Compliance team must participate in each merger or acquisition transaction to validate and approve the transaction and the Due Diligence at initial stages of the process and before issuing the final proposal to the Third Party.

6.2 Accurate Expense Recording and Process Auditing

All expenses related to financial matters must be properly recorded in the corresponding accounting accounts and cost centers, using the expense reporting procedures established by the Credicorp companies. These procedures must ensure accurate and fair information, proper recordkeeping, with reasonable detail, and adequate internal control. It must be ensured that the expense records clearly reflect the true purpose of the expenses.

At Credicorp, periodic internal audits are conducted on the company's relevant operations to ensure, among other considerations, compliance with applicable laws and with this Policy.

6.3 Training and Awareness

Credicorp provides anti-bribery and anti-corruption training to all its Representatives. Each Credicorp company establishes its own communication plan based on its risk levels and target audience.

The Local Compliance team is responsible for maintaining records and evidence of the training received by the Representatives. Training may include virtual courses, targeted sessions (in-person or virtual), internal communications, awareness campaigns, activations, and others as applicable.

6.4 Continuous Improvement

Credicorp, through its local Compliance teams and in coordination with its Representatives, adopts the necessary measures and actions to ensure that the Prevention Model is continuously improved in accordance with the evolution of risk, its measurement, control, and monitoring, as well as the systems for detecting red flags, across all Credicorp companies.

6.5 No Retaliation

Credicorp will not take or tolerate any form of retaliation³ against individuals who, in good faith, raise concerns or report an act of corruption, whether based on direct knowledge or mere suspicion. The same protection applies to those who cooperate in an internal or external investigation.

Credicorp will not penalize any act of refusal to engage in corruption, even if such refusal results in the loss of business opportunities for Credicorp.

7. Procedures

The guidelines described above must be complemented with appropriate procedures, workflows, and approval protocols that enable Stakeholders to understand and comply with this Policy.

³ Corporate Policy on Credicorp GenÉtica Alert System: https://www.grupocredicorp.com/assets/pdf/SistemadeDenuncias_.pdf

To that end, each Credicorp company must draft and promulgate an “Anti-Corruption Manual” with more detailed guidance. It is the responsibility of the Local Compliance team to ensure that all employees are made aware of this manual.

8. Exceptions

Any exceptions to this Policy must be duly justified and submitted for evaluation and approval to the Corporate Prevention Model Officer, the Local Compliance Head, and/or the Compliance Officer responsible for the Anti-Corruption program.

The Corporate Prevention Model Officer and/or the Compliance Officer responsible for the Anti-Corruption program may, if appropriate, escalate the request to the relevant Board or Committee for approval.

The Corporate Prevention Model Officer may delegate the approval of exceptions to any other local or corporate management within a Compliance team.

9. Sanctions

Violations of this Policy may result in the application of disciplinary sanctions, depending on the severity of the case, which may include the termination of employment, in accordance with labor laws, and without prejudice to any applicable civil or criminal actions.

Document approved by:
Credicorp Board of Directors in sessions held on 08/24/2023 and 26/06/2025
Corporate Compliance and Ethics Division Management