

# GENETICA

CREDICORP



## ETHICS TO THE NEXT LEVEL

CODE OF ETHICS

► **Fanny Vasquez**  
Customer Service  
BCP Peru

► **Alfredo Fernandez**  
Commercial  
Pacífico Seguros

► **Macarena Arce**  
Investment Products  
Credicorp Capital Peru

► **Julio Lino**  
Human Management  
Mibanco Peru



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GenETICA Credicorp is our commitment to work together with our stakeholders to build long-term relationships based on trust so we can reach together the next level.

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# CREDICORP: WHO WE ARE AND HOW WE DO EVERYTHING

## PURPOSE

Contribute to improve lives, by driving the changes that our countries need.

## ROLE

We are agents of change that create superior value in our society.

## VISION

To be a sustainable financial leader in Latin America, guided by a great purpose, oriented to the future, and focused on creating superior value for our employees, customers, shareholders and the countries we operate in.

## VALUES

**Respect:** We respect and value people, their own beliefs and decisions, always promoting a participatory, collaborative and horizontal work environment.

**Equity:** We treat and reward people in a fair and equitable way, always promoting equal rights, responsibilities and opportunities for everyone.

**Honesty:** We promote transparency and motivate our actions to be consistent with our believes so we can build trust-based relationships.

**Sustainability:** We attend to the people's needs in order to guarantee social, economic and environmental well-being of the present and the future.



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# HELLO!

Companies have a key role in society. Therefore, in Credicorp, as financial leaders in Latin America, we work every day motivated by a clear purpose: **“Contribute to improve lives, by driving the changes that our countries need”**.

To make it a reality, we always find new ways of doing everything while feeding our innovative and agile spirit. However, our essence always remains intact, and it is largely shaped by our ethics.

Through this Code of Ethics, we reaffirm our commitment with our stakeholders. This Code contains our GenETICA Credicorp, which is our principles, values and expectations. **It is a distinguishing sign that all of us, who give life to this organization, carry within us** and drives us to not only doing things well, but, but to take them to the next level, in order to achieve a positive impact in our society and the environment.

**Gianfranco Ferrari**  
CEO Credicorp



GenETICA CREDICORP  
ACCOMPANIES US IN  
**EVERY STEP  
WE TAKE**

and guides us to make the right  
decisions with our stakeholders.



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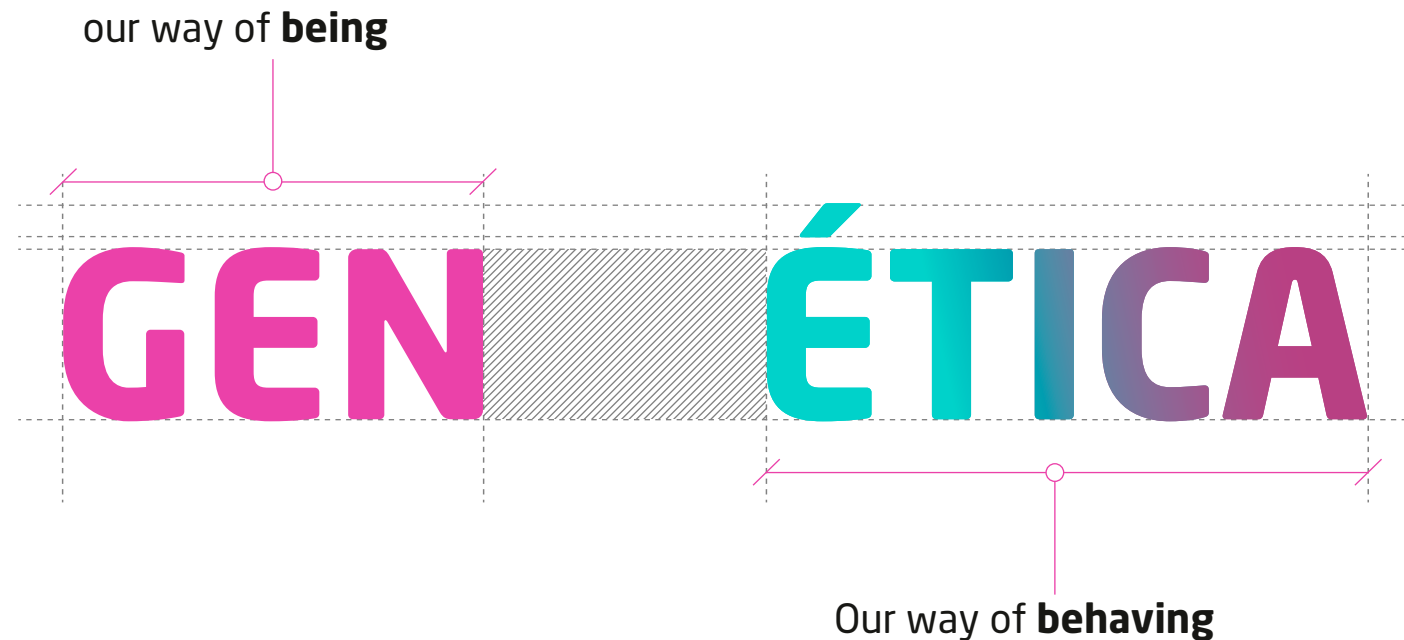


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# OUR CODE OF ETHICS

"The Code" positively guides us to promote a sustainable vision in the countries where we operate and thus reach the next level of trust with our stakeholders, operating in harmony with them and with our environment.



## What does it mean to be "on the next level"?

To be true agents of change in our society, being conscious of our characteristics that make us unique and allow us to reach the next level. That is our GenÉTICA Credicorp.



### HOW DOES THE CODE HELP US?

It helps us to make better decisions everyday, and to identify when we need advice no matter how complex the situation can be.



### WHO SHOULD APPLY THE CODE?

You and each one of the more than 36 thousand people, including employees and directors, who were chosen to be part of Credicorp because our way of being and behaving, our GenÉTICA.



### WHAT HAPPENS WHEN SOMEONE DOESN'T COMPLY WITH THE CODE?

Not complying with the Code pushes us away from our purpose and makes us lose the trust of our customers and society, damaging our reputation and could even end an employment relationship, regardless of the possible civil or criminal consequences, depending on how serious the case is.



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# EMPLOYEES TO THE NEXT LEVEL

We live our GenETICA 24/7 as professionals and as citizens, inside and outside Credicorp.

We act with honesty and integrity.

We accept our mistakes and take responsibility when we are wrong.

We care not only about WHAT we achieve, but also about HOW we achieve it, because our values are above our results.

**Transparent and honest**

**Brave and determined**

We speak-up when we see behaviors that go against our values and our Code.

We give feedback and help others assertively and responsibly according with our GenETICA.

We are not silent, even when it comes to having difficult conversations on ethical issues.

We respect all points of view and value diversity.

We build long-term relationships of trust with all our stakeholders.

**Respectful and empathetic**

**Achieve a positive influence in other people behavior**

We are aware that our actions and decisions have an impact on others.

We seek excellence in everything we do.

We put the best interests of Credicorp and the society above our personal interests.

We discuss ethical issues with freedom and transparency.

We know and apply the guidelines of the Code.

**Promotes our GenETICA Credicorp**

We identify situations that put our GenETICA at risk and when in doubt, we ask for advice.



► **Ricardo Garmendia**  
Employee Experience  
BCP Peru

# LEADERSHIP TO THE NEXT LEVEL

Credicorp leader always acts ethically, generates trust and promotes an environment where values are above results. Moreover, encourages people to connect the organization's purpose with their own and cares for the impact on our stakeholders.

Always brings interest, dedication and effort in an authentic and genuine way.

Is conscious that she is role model and assesses whether her behavior motivates and inspires others.

Encourages people to connect Credicorp's purpose and values with their own.

## Inspires

Supports her points of view, appreciates and celebrates other's success.

Accepts her mistakes and those of her team and transforms them into learning opportunities.

Holds difficult conversations with courage, transparency, and empathy.

## Is Brave

Builds reliable, transparent and lasting relationships far beyond the transactional level.

Promotes conversations on ethical issues.

Empowers her teams and promotes collaboration.

Promotes equity, diversity and inclusion.

Values different opinions.

## Connects with others

## Knows herself

Identifies and accepts her strengths and opportunities for improvement.

Internalizes every feedback.

Asks for help when needed.

## Makes things happen

Balances strategy with execution and keeps in mind not only the short-term results but also the vision of the future.

► **Rocio Perez-Egaña**  
Investments and Transactional Products  
BCP Peru



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# WE REPORT ANY VIOLATION OF OUR CODE

Ethics to the next level means identifying and reporting any act that is, or seems to be, against our GenETICA.

ALERTA

GENETICA  
CREDICORP

Is our Ethics Line and Whistleblowing System

## RAISE YOUR VOICE AND EXPRESS YOUR GENETICA

Everyday we strengthen our leadership by acknowledging the current risks in our actions.

## Making a report is safe and reliable



### We always take action

That's why your report must have sufficient and relevant information for an effective review and, if necessary, investigation.



### Zero retaliation

You can raise your voice in good faith without fear. We protect your identity and ensure your peace of mind during and after the investigation.



### 100% confidential

All information you provide will be used only for the purposes of the investigation and the corrective measures that may arise from it.



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# WAYS TO RAISE A CONCERN THROUGH ALERTA GENETICA

## 1

### Website

Enter [www.grupocredicorp.com](http://www.grupocredicorp.com) and click on "Alerta GenETICA - Whistleblowing System".

## 2

### WhatsApp

**+51 943 116 745**

Enter from your cell phone by clicking [here](#) or scanning the **QR code**.

## Remember

Follow up on your report. In some cases, we may ask you for additional information to move forward with the investigation.

► **Marisol Avalos**  
Personal Advisory  
Pacífico Seguros



### Q&A

#### What can we report?

- Corruption.
- Discrimination and workplace hostility.
- Sexual harassment and violations of human rights.
- Abuse of inside information and market manipulation.
- Conflict of interest and bad sales practices.
- Price fixing and fraud.
- Other acts that go against our Code.
- Retaliation.



#### If you are aware of an existing breach, report it!

Not only those who are responsible of the breach are at fault, but also those who are aware of the breach and do not say a word.



#### If you are not 100% sure of the breach, also report it!

Every concern reported in **good faith** is valid. We will review the report and, if necessary, apply any corrective actions.

**For more information:**



- [Alerta GenETICA Corporate Policy](#)



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# WE ACKNOWLEDGE AND TAKE RESPONSIBILITY FOR OUR DECISIONS

Sometimes we face situations that put our GenETICA to the test. Therefore, before you make any decision, ask yourself the following questions to keep your ethics at the next level:

1

Does it comply with regulations?

2

Is it aligned with our Code and policies?

4

Is it aligned with our purpose and values?

3

Am I creating value for Credicorp's stakeholders?

5

Will I be comfortable if my actions are disclosed in the media?

## YOU ARE NOT ALONE

Normally if the answer is **YES** to all the questions it would be ok to proceed. But if the answer to any of them is **NO**, or you are not sure, it is better to ask first.



## Q&A

### What should I do if there is a conflict between the Code and the practices in my department?

In general, if any business procedure comes into conflict with our Code, we must follow the Code. In case any local law comes into conflict with the Code, we must follow the law. Remember to ask your Compliance and Ethics team if you need advice.

► **Carlos Sotelo**  
Finance  
Mibanco Peru





# CUSTOMERS

- Our customers
- Market conduct
- Personal data protection
- Information security
- Fair competition
- Financial crime prevention

▶ **Karen Rios**  
Businesses  
Mibanco Peru

▶ **Stephany Cruz**  
Payment Solutions  
BCP Peru



We have a positive impact on people's lives by  
**placing them at the  
center of all our  
decisions.**

This is how we can accelerate the changes that our countries need.



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## OUR CUSTOMERS

# WE REACH THE NEXT LEVEL BY RESPONDING TO OUR CUSTOMERS EXPECTATIONS

And building **relationships** based on trust due to our transparency with them in any situation.

We advise our customers continuously, productively, and going beyond the transactional. We show genuine interest in their plans and provide them with relevant and timely solutions so they can make better decisions.



► **Rocio Vidal**  
Quality Assurance  
Prima AFP

► **Giuliana Bravo**  
Human Development  
and Administration  
Credicorp Capital Peru

► **Jose Valverde**  
Compliance and Ethics  
Mibanco Peru

We are agile and give our best to deliver an excellent customer experience



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# OUR PRIORITY IS TO BE FAIR AND TRANSPARENT WITH OUR CUSTOMERS

We offer products and services that meet the needs of our customers and use clear and simple language.



## Remember

**We sell responsibly** to remain as allies of our customers.



### We design

products, services and processes, always putting each of our customers at the center of our business.



### We apply

responsible sales practices that respond to our customer's needs and never mislead them.



### We provide

complete, relevant and timely information.



### We are committed

to the rights of consumers which are the basis to offer our products and services.



### We provide clear and timely responses;

as well as effective solutions to our client's claims. By listening to them we can be better everyday.



## Q&A

**I am constantly looking for new ways to sell more products to my customers. Is that okay?**

Yes. Just remember to offer our products with transparent clarity, without pressure and making sure that the customer's need is being met.

► **Jonathan Vasquez**  
Payment Solutions  
BCP Peru



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# WE PROTECT EVERYONE'S PERSONAL DATA

We are aware of our clients' and collaborators' trust when they provide us with their data. Handling it properly shows our respect for their rights and strengthens our bond with them.

We promote the protection of personal data as follows:

- ▶ We obtain consent for the use of personal data in a transparent way.
- ▶ We handle any personal data appropriately:



- ▶ We watch over the legality of the personal data we obtain.

## GenETICA Glossary:



### Personal data:

Any information that relates to an identified or identifiable person. For example: Names, surnames, date of birth, home address, email, telephone, personal ID number or tax ID, vehicle license plate, fingerprint, DNA, a selfie, etc.



## Q&A

**I am about to participate in the selection of a new supplier that will process certain personal customer databases. What should I do?**

Make sure that the databases were legally obtained and validate that the supplier's activity will contribute to a real business objective.



## Did you know?

We are all responsible for the protection of personal data to avoid disciplinary measures, legal contingencies, or regulatory sanctions.

- ▶ **Milagros Maekawa**  
Capital Markets  
Credicorp Capital Peru

**For more information:**



- ▶ Corporate Policy on Personal Data Protection



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# WE KEEP PRIVATE ALL CONFIDENTIAL INFORMATION

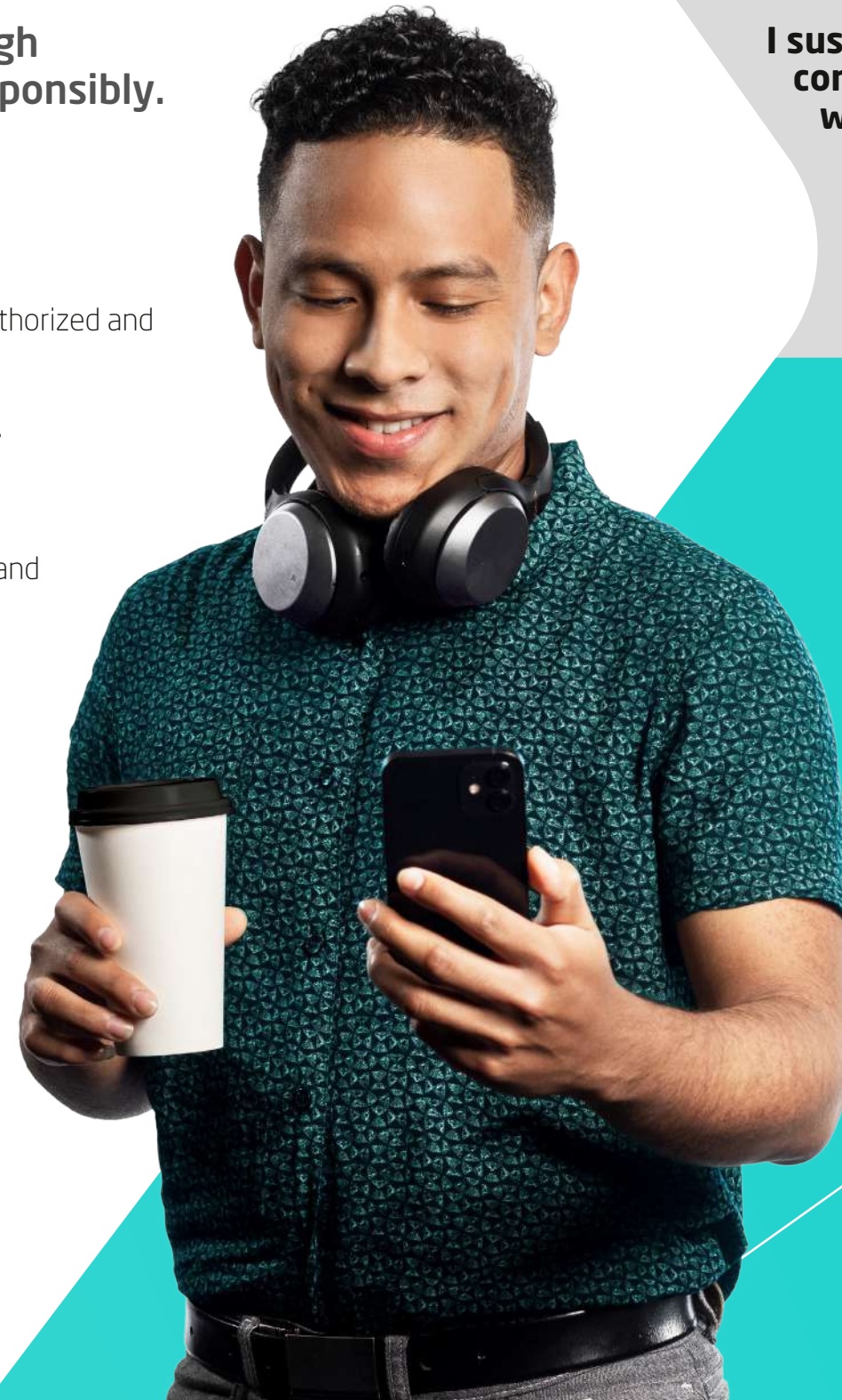
Because ethics to the next level is to recognize the high value that information has nowadays and act on it responsibly.

- ▶ We use the information that we access for the purpose for which we were authorized and keep it confidential.
- ▶ We responsibly handle confidential information and protect it from any threat.
- ▶ We limit the amount of data and the period for which it is shared.
- ▶ We safeguard the information of our clients' operations as if it were our own and in accordance with current regulations on confidentiality.

## GenETICA Glossary:

### Confidential information:

All information, about Credicorp, colleagues, clients, suppliers or any other stakeholder, that is not freely accessible and which, by agreements, contracts or regulation, must be protected by the company.



## Q&A

**I suspect someone has improperly accessed confidential information and earned money with it. What should I do?**

Report it immediately to the Information Security Department. You can also raise your voice by using Alerta GenETICA.



## Did you know?

We are subject to regulations that protect the secrecy of financial information (banking and stock privacy laws).

▶ **Jordan Herrera**  
Payment Solutions  
BCP Peru

**For more information:**



▶ Information Security Policy.



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# WE ARE COMMITTED TO FREE AND FAIR COMPETITION

We contribute to the welfare of society not only by offering innovative and high-quality financial solutions for our clients, but also by making responsible decisions and rejecting any anti-competitive business practice.

► **We promote economic freedom.**

We use objective, transparent and autonomous criteria when determining prices and commercial strategies.

► **We contribute to increase the economic well-being.**

We don't participate in unfair agreements, discriminate, or abuse of our position against competitors, suppliers or customers.

## Remember

Work together with your Compliance and Ethics team if you have any doubt about how business practices can contribute to free competition.



### Q&A

**If I receive a communication from a competitor stating that I am bringing the market down while questioning the interest rates of the recently launched personal loans. What should I do?**

Remember that agreeing on prices for products and services with competitors is wrong. In this case, the best choice is not to respond and report the situation to your leader and/or raise your voice using Alerta GenETICA.

► **Erickson Molina**  
Corporate Affairs  
BCP Peru

For more information:



► Free Competition Policy



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# WE FIGHT AGAINST FINANCIAL CRIMES

## AND ANY OTHER FORM OF ORGANIZED CRIME

As leaders in the Latin American financial sector, we are responsible for preventing money laundering and tax evasion.

### ▶ Prevention of Money Laundering and the Financing of Terrorism

We mitigate risks and comply with regulations and guidelines to avoid getting involved in illicit funds

### ▶ Know Your Customer (KYC)

We obtain quality information from the start, and throughout our business relationship.

### ▶ Fiscal Transparency

We identify the fiscal residence of our clients and comply with the reporting obligations to local and international regulators.

### ▶ Country Sanction List

We comply with the regulatory requirements and guidelines from international organizations to prevent crimes in high-risk countries.

### ▶ Fraud Prevention

We report any detected control weakness, fraud event or suspect of dishonest action.

### GenETICA Glossary:



#### Fraud:

Any act or omission with the intention to mislead or attempts to deceive or conceal something to gain an advantage or avoid a disadvantage.

▶ **Maria Alejandra Bodero**  
Compliance and Ethics  
BCP Peru

▶ **Diego Ore**  
Payment Solutions  
BCP Peru



### Q&A

**I am not clear about the source of certain funds from a customer who wants to use those for an unusual and significant operation. What should I do?**

In this case, you should not process the transaction and report the activity to your Compliance and Ethics team. The report is confidential, and you should not discuss it with the customer.

### For more information



- ▶ Corporate Policy for Prevention of Money Laundering and Terrorism Financing
- ▶ Corporate Policy on Common Reporting Standard
- ▶ Corporate Policy for the Foreign Account Tax Compliance Act
- ▶ Corporate Policy for compliance with OFAC Regulations



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# EMPLOYEES

- Diversity and gender equity
- Integrity and respect
- Human rights
- Occupational safety and health

▶ **Anthony Burns**  
 Process Optimization  
 Pacifico Seguros

▶ **Marjorie Buendia**  
 Contact and Sales Center  
 BCP Peru





We promote a work environment where people can thrive and have a great experience.

**We celebrate our diverse and inclusive workforce, people who live our culture and values.**



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# WE PROMOTE DIVERSITY AND EQUAL OPPORTUNITIES

To be at the next level is to make sure that anyone can feel free to be who they are, fostering gender equality and zero tolerance for sexual harassment.

- ▶ We apply fair labor practices, value diversity and promote inclusion, for the creation of an equitable environment. Hiring and promotions are based on meritocracy.
- ▶ We aspire to reach a balance in the participation of women and men at all levels in Credicorp.
- ▶ We believe that unconscious biases and gender stereotypes are barriers to equity. Therefore, we educate ourselves to identify and manage them.
- ▶ We promote a work-life balance without distinction of gender for the well-being of everyone who is part of our organization.

## GenETICA Glossary:



### Unconscious biases:

Associations and patterns we learned that build unconscious preferences and prejudices about some people or groups of people.



### Workplace sexual harassment:

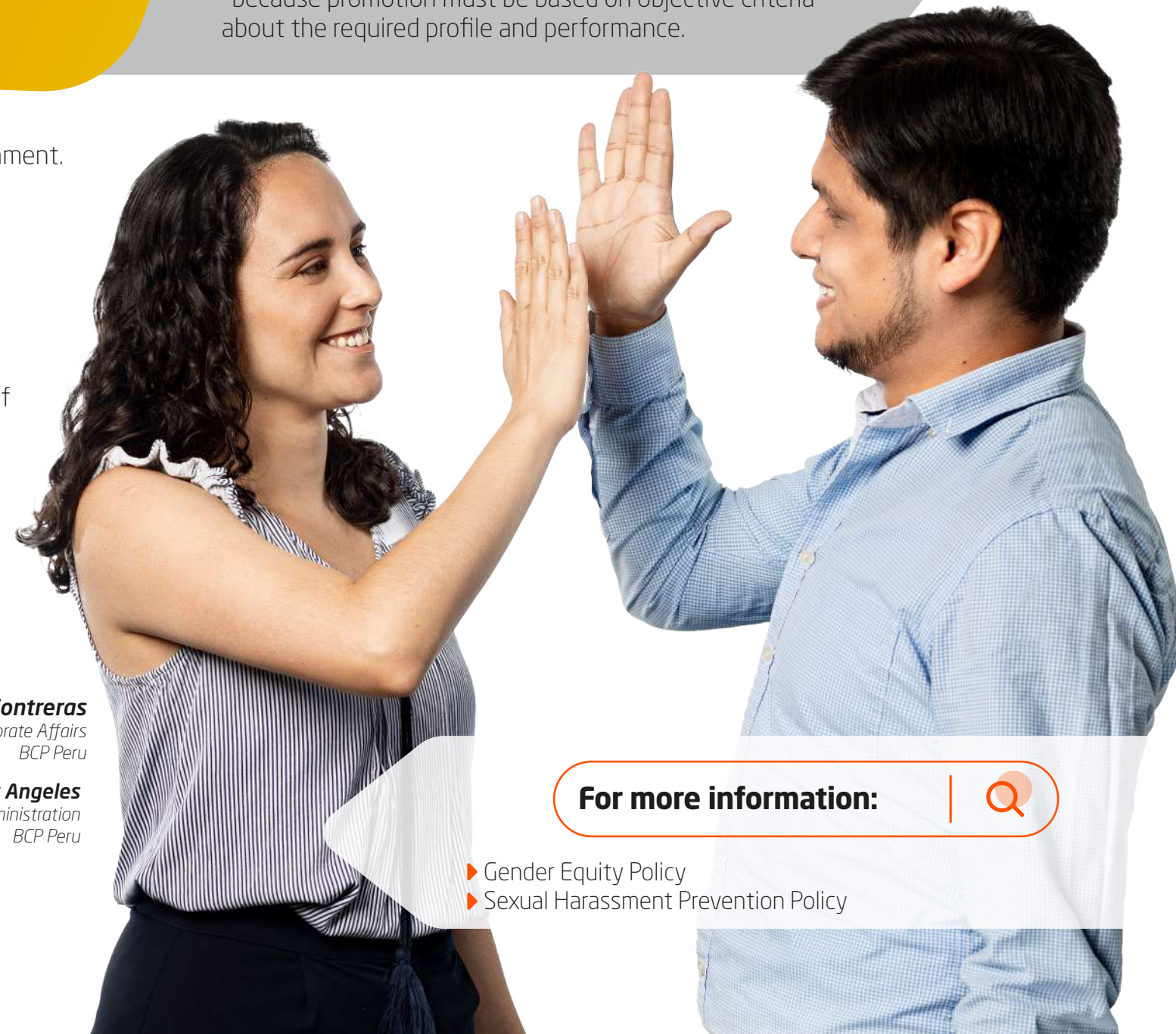
Unwelcome verbal or physical conduct of a sexual or sexist nature, that relates to, offends, intimidates or humiliates an employee.



## Q&A

**A co-worker was not promoted because having a newly-born won't let her have enough time for work. Instead, her direct supervisor promoted another employee who did not meet the required profile.**

You should report the situation to Alerta GenETICA because promotion must be based on objective criteria about the required profile and performance.



▶ **Alessandra Contreras**  
Corporate Affairs  
BCP Peru

▶ **Anthony Angeles**  
Human Development and Administration  
BCP Peru

**For more information:**



- ▶ Gender Equity Policy
- ▶ Sexual Harassment Prevention Policy



# A POSITIVE WORK ENVIRONMENT BASED ON MUTUAL RESPECT

Together we reach the next level when you give your best, reach your goals and feel more confident. That is why we are against any type of discrimination, intimidation, harassment or retaliation.

- ▶ We respect others' actions and opinions, always acting honestly and respectfully of people's dignity.
- ▶ We keep our workplaces free of violence.
- ▶ We live our GenETICA anytime and anywhere, even in personal social networks.  
(See Section: External communication)

## GenETICA Glossary:



### Retaliation:

Harassing behavior towards an individual who has made a good faith report regarding a compliance issue.



### Workplace hostility:

Unwelcome or offensive behavior, which causes one or more employees to feel uncomfortable or intimidated in their workplace.



▶ **Karoline Teran**  
Computing  
BCP Bolivia



## Did you know?

To promote a healthy and safe environment, working under the influence of alcohol or illicit drugs is strongly prohibited.

▶ **Marcelo Gisbert**  
Retail banking  
BCP Bolivia



## Q&A

In what forms hostility can be present in the workplace?

- ▶ Lack of timely payment of remuneration.
- ▶ Actions that may deliberately put life or health at risk.
- ▶ Violent verbal or physical conduct to a person or her family.
- ▶ Any type of discrimination based on race, sex, religion, opinion, language, disability, etc.

For more information:



- ▶ Corporate Ethics and Conduct Policy
- ▶ Internal Work Regulations



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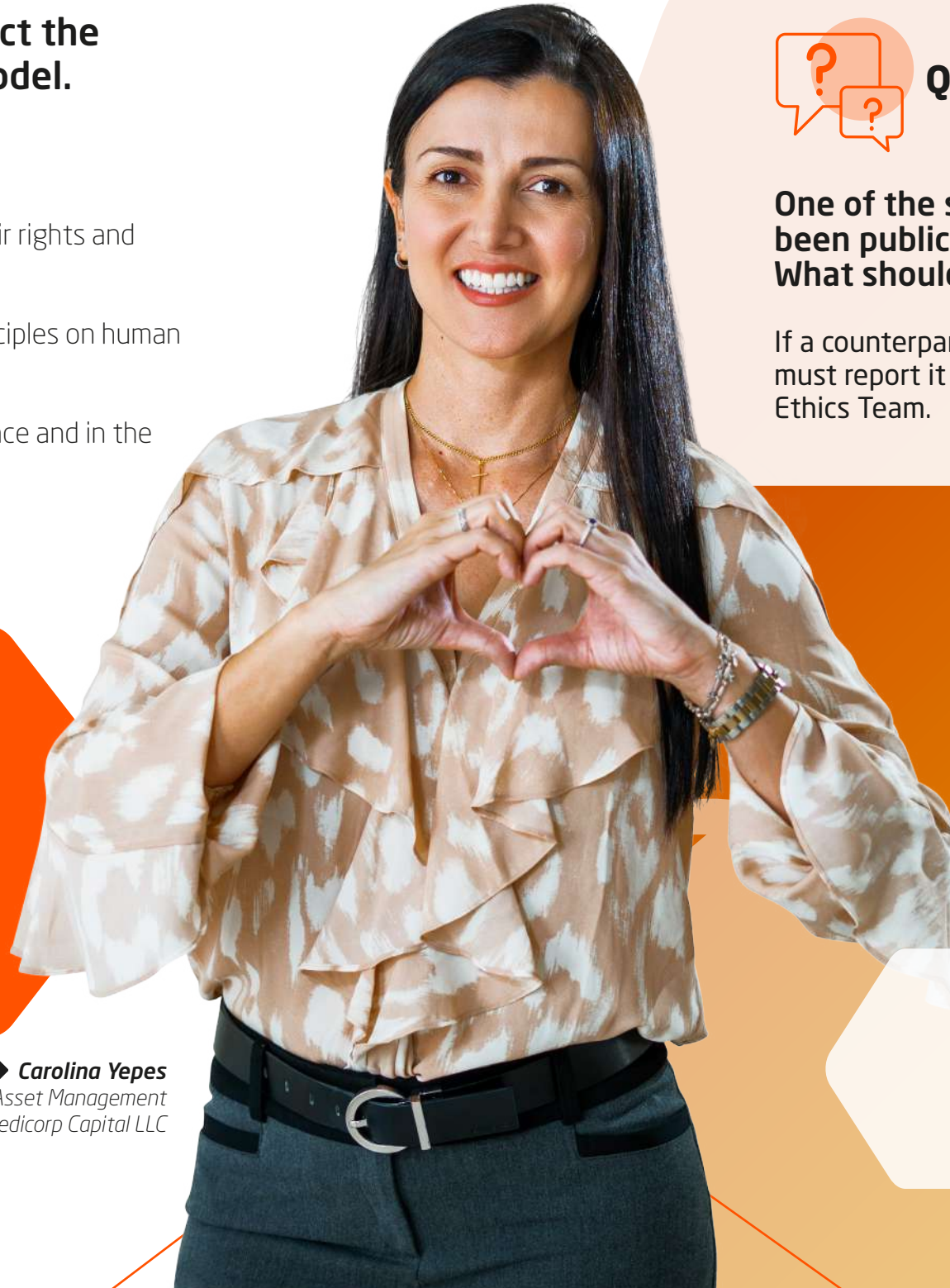
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# PEOPLE AND THEIR FUNDAMENTAL RIGHTS ALWAYS GO FIRST

The next level is to fulfill our commitment to respect the human rights that are immersed in our business model.

- ▶ We provide our employees an environment where everyone respects their rights and promote initiatives that support these conditions.
- ▶ We encourage our suppliers to adhere and comply with the laws and principles on human rights, and we train them in certain relevant aspects.
- ▶ We care that human rights can be respected in the projects that we finance and in the investments that we promote and/or make.



▶ **Carolina Yepes**  
 Asset Management  
 Credicorp Capital LLC

## Our commitment to human rights includes:

- ▶ Respect for freedom of association, unionization and collective bargaining.
- ▶ Rejection of modern slavery, child labor, forced labor, and human trafficking.
- ▶ Promotion of safety, physical and mental health, and emotional well-being for our employees and third parties.
- ▶ Compliance with labor laws with regard to compensation and benefits.



### Q&A

**One of the suppliers with whom we work has been publicly accused of exploiting child labor. What should I do?**

If a counterpart shows signs of illegal behavior, you must report it immediately to your Compliance and Ethics Team.



### Did you know?

Our commitment to human rights complies with international regulations and guidelines such as the Global Compact and the United Nations Guiding Principles on Business and Human Rights.

### For more information:



- ▶ Corporate Human Rights Policy
- ▶ Code of Conduct for Suppliers



# SAFETY AND HEALTH IN OUR DAY TO DAY

We take our ethics to the next level, maintaining and promoting a safe and healthy work environment, where people can discover and reach their full potential.

- ▶ We promote a continuing education on health and safety issues.
- ▶ We report any unsafe acts and conditions to avoid accidents or illnesses.
- ▶ Our health and safety controls cover customers and suppliers because together we build a better work environment.



## GenETICA Glossary:



### Unsafe act:

Any action that does not meet our safety standards and unnecessarily exposes an individual or a group to accidents or occupational diseases.



### Unsafe condition:

Any condition that could cause undue hazard to life, limb or health of any person or expected to be on or about the premises.



## Q&A

### How can we contribute to safe and healthy work conditions?

- ▶ Identifying the risks and threats to health and understanding the controls that prevent us from any damage.
- ▶ Actively participating in training and safety drills and exercises.
- ▶ Collaborating with timely reporting of unsafe act or conditions and in the investigation of events.
- ▶ Contributing with your suggestions to improve our health and safety management system.

## Remember

We have a Safety and Health at Work Committee that has an appropriate representation of our employees.

▶ **Karen Pacheco**  
Customer Care  
Culqi

**For more information:**



- ▶ Occupational Safety and Health Policy



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# SUPPLIERS

- Suppliers and third parties
- We know each other
- Conflict of interest management
- Anti-corruption and anti-bribery
- Gifts and hospitality

► **Nelson Villegas**  
 Operations  
 Pacifico Seguros

► **Erick Tapia**  
 Corporate Support  
 Credicorp Capital Peru



Our suppliers are the allies that help us achieve our purpose.

# Honesty and mutual respect are essential

to keep building trust and to strengthen our relationship



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# WE DO BUSINESS WITH EMPATHY AND TRANSPARENCY

Our suppliers, business partners, consultants, agents and counterparties, are allies, and motivate us to be more resilient and agile and drive us to take our growth to the next level.

We strengthen our reputation by living our GenETICA Credicorp. This is how we build ethical and sustainable relationships

We act responsibly and respectfully during the selection and renewal processes for suppliers and other third parties, avoiding any conflict of interest.



► **Héctor Rivera**  
Tribe Hosting  
BCP Peru



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# WE KNOW OUR SUPPLIERS TO DEVELOP SOLID COMMERCIAL RELATIONSHIPS

Our suppliers and third parties are selected because of their quality, competitiveness and alignment with our ethical standards.

► We promote collaborative relationships with our suppliers which contemplate:



- We verify the legality of potential suppliers using all our resources and available information.
- We encourage our potential suppliers that may access to confidential information to comply with all our information security guidelines.  
(See Section: Information Security)

## GenETICA Glossary:



### Third party:

They can be business partners, consultants, agents, counterparties.

► **Cristie Pajares**  
Affluent Banking  
BCP Peru

► **Carlos Morante**  
Non-Financial Risks  
BCP Peru

For more information:



► Corporate Procurement Policy



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# WE AVOID ALL TYPES OF CONFLICTS OF INTEREST

We promote the transparency of our actions to always keep them aligned with Credicorp's purpose.

## What is a conflict of interest?

It is a situation in which a personal interest affects or may affect the impartial performance expected in your duties and may arise in your everyday job. Some examples are:

- |   |  |
|---|--|
| ✓ | Have a second job in other companies in the financial sector.  |
| ✓ | Start or have a significant participation in a business that competes with Credicorp companies or may affect our reputation. |
| ✓ | Recommend a provider or participate in the selection of providers with whom we are associated.                               |

- ▶ We are always alert and identify these and other situations.
- ▶ Any potential conflict is managed according to our guidelines.

▶ **Enrique Gonzales**  
Global Trade  
BCP Peru



## Did you know?

It is not easy to identify a conflict of interest. Therefore, when in doubt it is always better to ask and avoid them.

It is natural for you to have interests or relationships outside of Credicorp, the important thing is that you make them transparent by reporting them to your Compliance and Ethics team.

## Remember

Our decisions must be the right decisions, and must also be perceived as right. This is next level ethics.

## For more information:



- ▶ Conflict of Interest Management Policy
- ▶ Corporate Policy for Related Parties



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# ZERO TOLERANCE TO CORRUPTION AND BRIBERY

This is our commitment to society and therefore, the next level is acting on what we believe, motivating people to do the right thing, and promoting integrity in our environment.

- ▶ We do not offer, give or accept bribes of any kind, direct or indirect, to influence decisions, secure advantages, benefits or obtain or retain business.
- ▶ All Lobbying with public officials with decision-making power must be carried out by authorized employees and maintaining integrity.

## GenETICA Glossary:



### Lobbying:

Actions such as oral or written communication, by any means, with the intent to influence a public decision.



### Public official with decision-making power:

Any official with the authority to make public decisions while carrying out their duties. Example: President, congressmen or any civil servant in a post of confidence in the Government. This also includes political candidates and parties, and may include their relatives and companies.



## Q&A

**A client asked me if I can help his daughter get an internship at one of the Credicorp companies. The client also told me that in exchange for ensuring the internship, he will oversee transferring all her liabilities to the group companies. Is this a bribe?**

Yes, because the new business is offered to obtain internships in exchange. This behavior goes against our Credicorp GenETICA.

## Remember

A bribe can take the form of anything of value: cash, gifts or their equivalent. (See section: *Gifts and hospitality*) or even donations (See section: *Positive Role in Society*)

▶ **Andrea Vasquez**  
Marketing and Communications  
BCP Peru

**For more information:**



- ▶ [Corporate Policy to prevent Corruption and Bribery](#)



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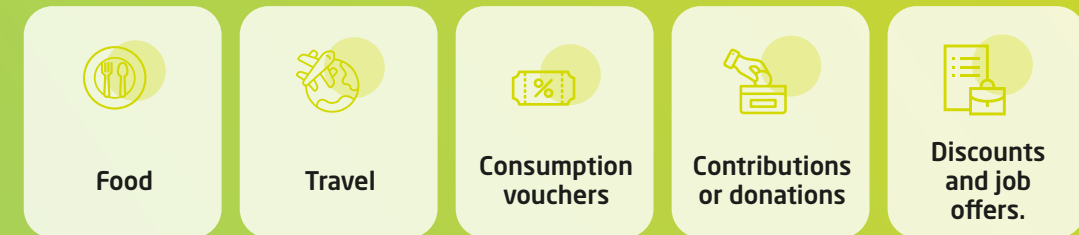
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# GIFTS AND HOSPITALITY

We value our ability to conduct business free from undue influence.

► Gifts and gratuities can take the form of:



- We accept gifts and hospitality if they are of reasonable value, not periodic, and serve a legitimate business reason.
- It is forbidden to give gifts and gratuities to public officials.

**If you were offered a gift, report it to your Compliance and Ethics team.**

## GenETICA Glossary:



### Public Official:

Any candidate, current employee or other person holding a position at any government agency (whether at a national, state/provincial or local level) including state-owned or -managed companies.



## Q&A

**I'm about to close a contract with a client, my birthday is near, and this client wants to send me a gift. Should I accept it?**

Although the gift is for your birthday, it may not be a good time to receive it because of the new contract. We should avoid these situations as far as possible.



## Did you know?

In case you want to meet with a public official, this meeting must always be at the building of the public entity where the public official works and within office hours.

► **Daniel Lozano**  
Corporate Finance  
Credicorp Capital Colombia

**For more information:**



► Corporate Policy to prevent Corruption and Bribery



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# SHAREHOLDERS

- Cybersecurity
- Protecting our assets
- Corporate Governance
- Market Abuse Prevention
- External communication

► **Beth Delgado**  
Risks  
Mibanco Peru



Fulfilling our purpose means

**to generate value for  
our shareholders, and  
sustainability drives us  
to achieve it.**

GenETICA Credicorp motivates us to always do the right thing,  
avoiding situations that could affect our sustainable growth.



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# WE PROTECT OUR BUSINESS AGAINST CYBER THREATS

We comply with cybersecurity regulatory obligations and continuously improve our management system according to the best international practices.

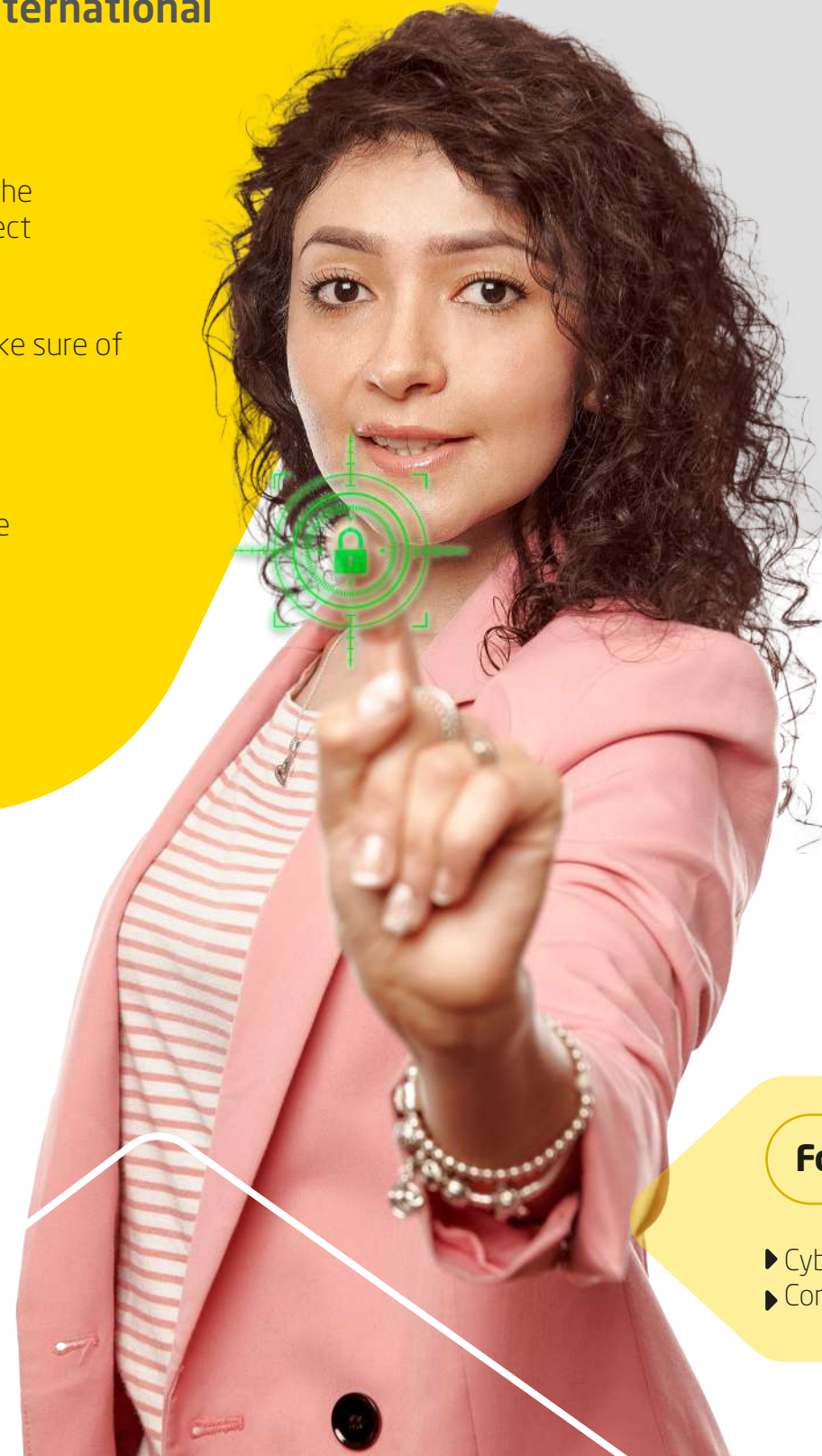
Cyber threats can be internal, external, deliberate or accidental, and can compromise the availability, confidentiality, integrity and privacy of our information, and therefore affect our assets.

- ▶ We are cautious and thoroughly review the emails and information requests to make sure of their veracity.
- ▶ We do not use our corporate email for personal purposes.
- ▶ We do not use unlicensed software or unauthorized audiovisual downloads, and we keep our devices updated to avoid security vulnerabilities.

## Remember

You can take your ethics to the next level on information entrusted to you:

- Do not share it by insecure means (mails or public sites).
- Do not expose it (physically or virtually).
- Do not share your accesses.



## Q&A

### How can I make sure that the emails I receive are secure?

Always check the sender's email address, attachments, and links. In a phishing attempt, cyber attackers use emails that look alike to the original. In addition, be cautious when receiving a communication that requests your personal or financial information.

▶ **Aurora Jerez**  
Retail Banking  
BCP Bolivia

**For more information:**



- ▶ Cybersecurity Policy
- ▶ Computing Resources and Information Acceptable Use Policy



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# WE USE OUR ASSETS CORRECTLY AND APPROPRIATELY.

We reach the next level caring for and protecting Credicorp's assets as if they were our own. In doing so, we safeguard the interests of our shareholders.

Assets	Expected use
<b>Facilities and Furniture:</b> Office supplies and equipment.	For business purposes only. We do not lend or sell them, unless we are authorized.
<b>Brand:</b> distinctive elements <i>(See External Communication Section).</i>	In business activities and externally only when we are authorized.
<b>Monetary:</b> Budget and travel expenses.	For purposes assigned in good faith.
<b>Intangibles:</b> Software, inhouse developments, working hours.	Inventions, concepts, ideas, processes are the property of Credicorp.
<b>Private and onfidential information</b>	See sections: <i>Information security, Protection of personal data &amp; Cybersecurity.</i>



► **Claudia Pasco**  
Human Development and Administration  
Pacífico Seguros

## Did you know?

Credicorp reserves the right to record telephone, mail or courier communications made through company owned devices.

## Remember

No Credicorp system should be used to transmit electronic texts or electronic images of sexual content or material of an offensive, discriminatory or hostile nature.

## For more information:

- Corporate Ethics and Conduct Policy
- Internal Company Regulation



# WE BUILD TRUST THROUGH A SOLID CORPORATE GOVERNANCE

The next level is to promote the transparency of information and to contribute to the evolution of our internal control system towards a greater diversity, independence and capabilities for a better decision-making.

## Our corporate governance scheme:

- ▶ Is part of Credicorp's sustainability strategy.
- ▶ Prevents our directors from making decisions affected by potential conflicts of interest.
- ▶ Establishes internal audit control systems, regulatory compliance and risk management.
- ▶ Provides equitable treatment to all our shareholders.

## Information for our investors and other stakeholders:

- ▶ It is disseminated in an equitable, complete, and clear manner, providing and explaining relevant and timely information so our stakeholders can make informed decisions.
- ▶ It is elaborated by different leaders of the organization to incorporate expert's opinions and diverse points of view.
- ▶ It is consistent throughout our different releases.

▶ **Jaime Urbina**  
Retail Sales and Services  
Pacífico Seguros

▶ **Margarita Gil**  
Commercial  
Prima AFP



## Did you know?

On our **corporate website** you can find complete and up-to-date information about us. If you wish to contact the Investor Relations team, send an email to: [investorrelations@credicorpperu.com](mailto:investorrelations@credicorpperu.com).

## Remember

- To falsify, destroy, alter, or hide records is illegal and unethical.
- Do not disclose confidential information. (See section: *Information security*)

## For more information:



- ▶ Corporate Governance Policy
- ▶ Shareholder's Guide
- ▶ Sustainability Policy
- ▶ Code of Ethics for Professionals with Financial Responsibility



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# WE CONTRIBUTE TO THE TRANSPARENCY OF THE STOCK MARKETS

We reject market manipulation and any abuse of inside information.

- ▶ Keep confidential any inside information to which you may have access due to your role in Credicorp.
- ▶ Do not make personal investments or recommend investment strategies using inside information or with the intention of manipulating the market.
- ▶ Prevent and report any action or conduct that could generate misleading financial reports.

## GenETICA Glossary:



### Inside information:

Information regarding an issuer, its businesses, or its securities; whose public knowledge may influence the liquidity, the price, or the listing of the securities issued.

Examples:

- ▶ Preliminary financial statements.
- ▶ Information on mergers and acquisitions.



### Market manipulation:

Practices that threaten the free price formation or cause an artificial evolution of prices or liquidity in the stock markets.



## Q&A

**A client told me about a big project that they are developing, and I want to buy shares of their company because it is very likely that the price will increase when the project is made public. Is it ok?**

No, this information must be kept confidential because it was shared as part of a client-advisor relationship, and it has not been made public yet. You would be committing the crime of insider trading.

## Remember

These guidelines apply to our transactions in the stock markets in a personal capacity, on behalf of the Credicorp companies or in a fiduciary capacity.

▶ **Javier Alonso Scheelje**  
Investments  
Credicorp Capital Peru

**For more information:**



- ▶ Corporate Market Abuse Prevention Policy



# WE COMMUNICATE RESPONSIBLY: MEDIA AND SOCIAL NETWORKS

We maintain the trust of our stakeholders by using a precise and clear language and communicating with them according with our purpose and values.

- ▶ **We value other's acts and opinions**, and with an honest and measured behavior and being respectful for the dignity of people. Therefore, we do not issue false, defamatory comments, insults, attacks or destructive criticism, even in personal social networks and other media.
- ▶ **If we are not an authorized spokesperson, we must clarify that we are not speaking on behalf of Credicorp** or any of its subsidiaries.

▶ **Jhon Rojas**  
Operational Efficiency PMO  
Mibanco Colombia

## GenETICA Glossary:



### Distinctive elements:

- ▶ Images, symbols, graphics, logos and sounds that identify us.
- ▶ Commercial slogans or phrases that identify us.
- ▶ Words, numbers and colors that differentiate us in the market.



## Q&A

### Can I use Credicorp's distinctive elements in a personal capacity?

It is not possible if it is about situations unrelated to our responsibilities as employees. Likewise, it is not allowed to create different pages or publications that contain these type of elements without proper authorization.  
(See section: *Protection of our assets*)



## Did you know?

You are responsible for what you say and publish, **even more so if you have a leadership position in the company.**

▶ **Diana Torres**  
Commercial  
Mibanco Colombia

## For more information:



- ▶ Corporate Ethics and Conduct Policy
- ▶ Social Media Policy



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# COMMUNITY

- Caring for the environment
- Financial inclusion and education
- Appropriate political activities
- Positive role in society

▶ **Gustavo Donayre**  
Payment Solutions  
BCP Peru

▶ **Raquel Benites**  
Commercial Pacifico  
Seguros

▶ **Santiago Gonzales**  
Management and Human Development  
and Administration  
Prima AFP





# We promote sustainable development in the countries where we operate.

At Credicorp, sustainability is essential. It is a priority, and it is immersed in our way of doing business, thus creating strong ties with society and rewriting our history.



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# WE PROMOTE A TRANSITION TOWARDS AN ENVIRONMENTALLY SUSTAINABLE ECONOMY

We take our ethics to a next level by showing respect for the environment, and we acknowledge the impact of climate change.

## Our daily life

- ▶ We incorporate sustainability factors into our investment decision process.
- ▶ We are committed to measuring, monitor, and reducing the environmental impact of our operations, and to promoting responsible waste management.

## Our commitment and aspirations

- ▶ We encourage our clients in key sectors to properly manage their main environmental risks to which they are exposed.
- ▶ Our goal is to develop financial solutions that encourage our corporate clients to:
  - Increase their net positive social and environmental impact.
  - Acknowledge the effects of climate change.
  - Move towards more sustainable business practices.



### Did you know?

Some of our restricted activities:

- ▶ Trafficking of fauna, wild flora or any derived products.
- ▶ Trade of radioactive substances, persistent organic pollutants.
- ▶ Fishing with trammel nets or driftnets in the sea, with nets over 2.5km long, etc.

▶ **Elsy Egusquiza**  
Marketing and Communications  
BCP Peru

## Remember

We measure our carbon footprint annually with an independent auditor. In this way, we get closer to meeting our goal of becoming carbon neutral.

### For more information:



- ▶ Corporate Sustainability Policy
- ▶ Credicorp Environmental Policy



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WE CLOSE GAPS IN OUR SOCIETY THROUGH

# INCLUSION AND FINANCIAL EDUCATION

We reach the next level by acknowledging our leadership in the region and acting according to that.

We create solutions with the purpose to integrate more people into the financial system:

- ▶ We are committed to innovation and digital transformation to continue anticipating customer needs.
- ▶ We take advantage of technology to create inclusive products and services, appropriate channels and contact points in order to reach unbanked populations.
- ▶ We always use transparent and clear language to provide a more agile and simple experience.  
*(See section: Market Behavior)*
- ▶ We help small businesses grow; whether they are our clients, suppliers, third parties or are linked to our corporate clients.

▶ **Jorge Lazo**  
Marketing and Corporate Affairs  
Pacífico Seguros



## Financial education

We want people to develop a healthy relationship with the financial system. Therefore, we educate them in:

- ▶ Money management.
- ▶ Money management decisions.
- ▶ Savings culture.
- ▶ Insurance management.
- ▶ Digital and other skills.

We have financial education programs, and we are constantly expanding their scope, content and impact.



## Did you know?

Our Financial Inclusion strategy, initiatives and results are closely monitored, and their progress are shown annually in our Sustainability Report.

For more information:



- ▶ Corporate Sustainability Policy



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# RESPONSIBLE POLITICAL AND SOCIAL ACTIVISM

We respect political causes, the civic duties of people and everyone's right to participate in different processes.

- ▶ We make sure that our political activities or contributions are not perceived as derived from our role at Credicorp.
- ▶ Directors and members of senior management must seek approval from the Compliance and Ethics team before making political contributions in their personal capacity.
- ▶ We do not participate on behalf of Credicorp or involve the company in discussions on social networks about politics, religion and similar topics. In case we want to do it personally, we make sure to not give the impression that our views represent those of Credicorp. *(See section: External communication)*
- ▶ We exercise our right to vote in a conscious and informed manner.

**Credicorp does not make political contributions or grant benefits to political organizations or their members.**

## GenETICA Glossary:



### Political contribution:

Any contribution granted to a political party directly or through third parties. It can be given in a monetary or non-monetary way (material goods, time of service, etc.).



## Q&A

### What should I do if I am about to accept or run for a public office?

It is your right to participate in the government of your country. Just keep in mind that there may be some conflict of interest with your role or position in Credicorp, so you should first obtain the authorization of your direct supervisor and your Compliance and Ethics team.

▶ **Maria Camila Coca**  
Capital Lab  
Credicorp Capital Colombia

### For more information:



- ▶ Corporate Ethics and Conduct Policy
- ▶ Social Media Policy
- ▶ Corporate Policy to prevent Corruption and Bribery



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# SOCIAL RESPONSIBILITY

## TO CONTRIBUTE TOWARDS THE CREATION OF A BETTER PLACE TO LIVE

The next level is to positively impact society and our motivation to change the world distinguishes us.

- ▶ We lead and support initiatives aimed at promoting the adoption of best practices in the business community.
- ▶ We encourage our employees to be agents of social change through our volunteer programs.
- ▶ We promote social responsibility with actions that improve the quality of life of vulnerable populations.
- ▶ We support the personal efforts of our employees to promote important social causes and acknowledge that these actions must not generate a reputational risk or be associated with Credicorp without the necessary authorization.

*(See section: External communication)*

▶ **Gustavo Valdes**  
Business Portfolio  
BCP Peru



Q&A

**In my team we are interested in donating on behalf of Credicorp to a non-profit organization that works with vulnerable populations. Is there something we should consider?**

At Credicorp we value the interest of our employees to contribute to the development of our countries. To comply with current regulations, a due diligence of the entity must be carried out. You should contact your Compliance and Ethics team.



### Did you know?

Our Volunteer Programs include social assistance deployments, campaigns to create awareness of current problems, advice to clients and entrepreneurs. The Volunteer Program of BCP Peru is one of the largest in the country.

**For more information:**



- ▶ Corporate Sustainability Policy
- ▶ Corporate Policy to prevent Corruption and Bribery
- ▶ Corporate Donations and Non-Commercial Sponsorship Policy



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▶ **Charles Cervera**  
Risks  
Mibanco Peru

▶ **Jose De La Mata**  
Risks  
Mibanco Peru

# CLOSING REMARKS

- Message from our CCO
- Additional resources



# EVERYTHING STARTS WITH YOU

Every action has an impact, from helping a customer to make an informed financial decision, to preventing sensitive information from being misused.

Big changes always begin with small actions. Just think about the impact generated by small positive actions started by more than 36,000 employees.

This is where GenETICA Credicorp fulfills its mission and guides your daily actions, because the decisions you make define our reputation as a company. You have the power to do the right thing and we are in this together.

Your Compliance and Ethics team is here to walk you through small and big actions because together we take our ethics to the next level.

All my best,

**Barbara Falero**

Chief Compliance and Ethics Officer



**TINY ACTIONS,  
BIG CHANGES,**  
to achieve a positive  
impact in society.



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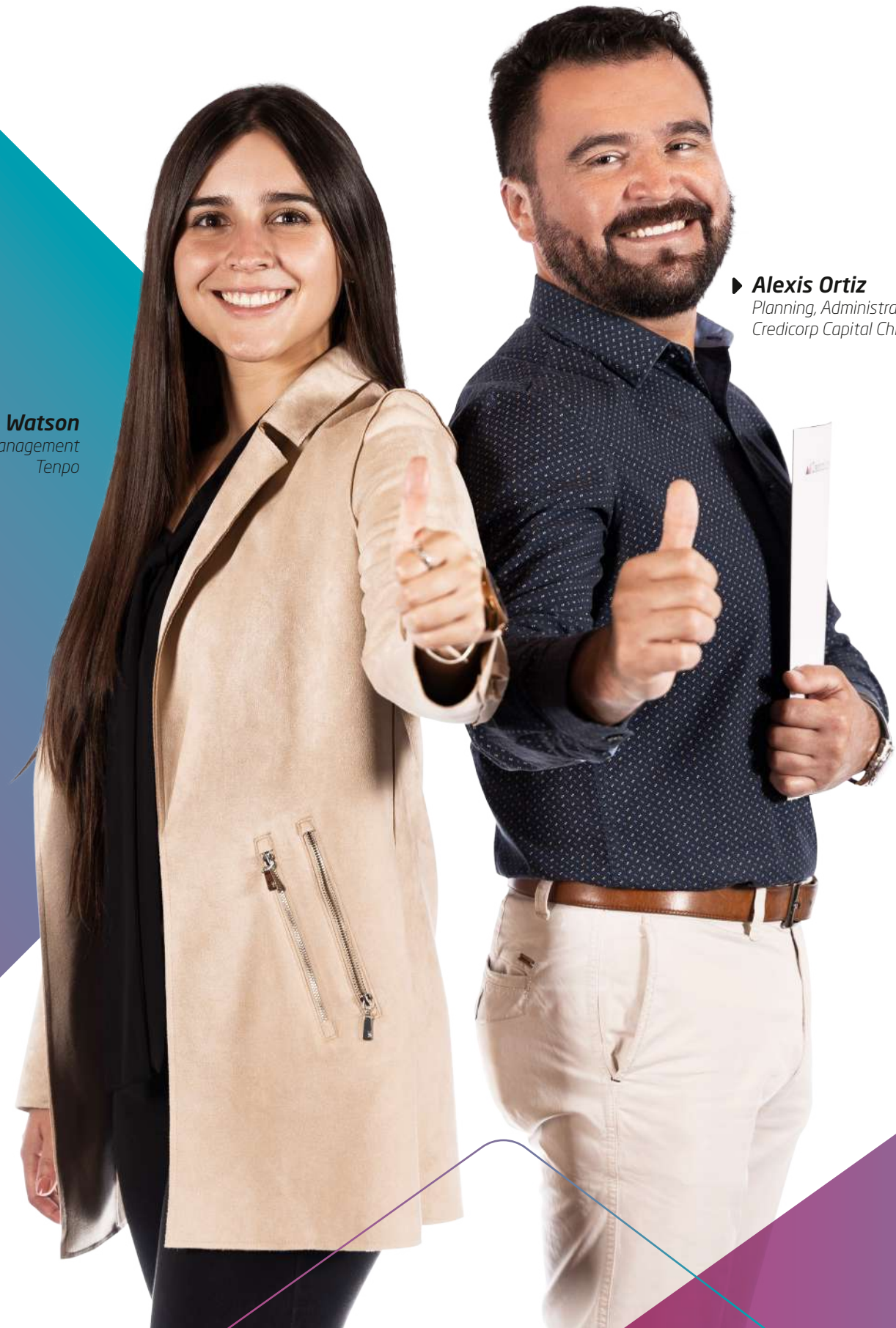
# WE ARE HERE FOR YOU

Contact your Compliance and Ethics team:

ASB, ASB Valores y BCP Panamá: [cumplimiento@asbnet.com.pa](mailto:cumplimiento@asbnet.com.pa)  
 Bancompartir: [cumplimiento@bancompartir.co](mailto:cumplimiento@bancompartir.co)  
 BCP Bolivia: [BoCumConsEticaCond@bancred.com.bo](mailto:BoCumConsEticaCond@bancred.com.bo)  
 BCP Miami: [itorres@bcpmiami.com](mailto:itorres@bcpmiami.com)  
 BCP Perú: [cumplimientoeticayconducta@bcp.com.pe](mailto:cumplimientoeticayconducta@bcp.com.pe)  
 Credicorp Capital Chile: [cumplimientochile@credicorpcapital.com](mailto:cumplimientochile@credicorpcapital.com)  
 Credicorp Capital Colombia: [cumplimentocolombia@credicorpcapital.com](mailto:cumplimentocolombia@credicorpcapital.com)  
 Credicorp Capital Perú: [cumplimientoperu@credicorpcapital.com](mailto:cumplimientoperu@credicorpcapital.com)  
 Credicorp Capital Ltd.: [compliance@credicorpcapital.com](mailto:compliance@credicorpcapital.com)  
 Culqi: [cumplimiento@culqi.com](mailto:cumplimiento@culqi.com)  
 Grupo Crédito: [cumplimiento@credicorpperu.com](mailto:cumplimiento@credicorpperu.com)  
 Mibanco: [cumplimiento@mibanco.com.pe](mailto:cumplimiento@mibanco.com.pe)  
 Mibanco Colombia: [cumplimiento@mibanco.com.co](mailto:cumplimiento@mibanco.com.co)  
 Pacífico EPS: [Cumplimientosalud@pacifico.com.pe](mailto:Cumplimientosalud@pacifico.com.pe)  
 Pacífico Seguros: [cumplimiento@pacifico.com.pe](mailto:cumplimiento@pacifico.com.pe)  
 Prima AFP: [cumplimiento@prima.com.pe](mailto:cumplimiento@prima.com.pe)  
 Tenpo: [cumplimiento@tenpo.cl](mailto:cumplimiento@tenpo.cl)

► **Vanessa Watson**  
 Personal Financial Management  
 Tenpo

► **Alexis Ortiz**  
 Planning, Administration and Finance  
 Credicorp Capital Chile



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# GENETICA

CREDICORP

# ETHICS TO THE NEXT LEVEL

CODE OF ETHICS



▶ **Christopher Arevalo**  
Commercial  
Pacífico Seguro

▶ **Sthephany Cruz**  
Payment Solutions  
BCP Peru

▶ **Jesus Calderon**  
Payment Solutions  
BCP Peru



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# CREDICORP

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The Code and its amendments are approved by the Credicorp Board of Directors and ratified by the corresponding Board of Directors of each subsidiary company. Any exception to the Code must be granted by the Corporate Compliance and Ethics Officer. Any exception to the Code for Credicorp's senior executives must be approved by Credicorp Board of Directors or one of its Committees. Credicorp reserves the right to interpret and to change the Code at its discretion. Credicorp respects the right of employees to speak publicly about matters of public interest and to participate in activities and communications related to the terms and conditions of their employment. Nothing in any section of our Code or our Policies is intended to limit or interfere with this right. Our Code and our Policies do not limit the right of employees to communicate with any regulator or body or participate in any investigation or process that may be conducted by such entities, including providing documents or information without notice to Credicorp. The Policies referenced in this Code are applicable, to the extent that they have been ratified by Credicorp companies.



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