INTELIGO BANK

Anti-Corruption and Bribery Policy

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Anti-Corruption and Bribery Policy

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Policy Overview

Objective

To establish guidelines that help prevent, identify, measure, control, investigate, and address instances of corruption and bribery, promoting the establishment of a culture of compliance and safeguarding the Bank's reputation.

Scope

This policy applies to all directors, managers, employees, temporary or contract staff (collectively referred to as "employees"), as well as all third parties acting on behalf of or for the benefit of the Bank.

Corporate Documents Intercorp Financial Services

- Corporate Policy Compliance
- Code of Ethics
- Corporate Anti-Corruption Policy and Guidelines
- Corporate Whistleblower Manual
- Corporate Ethical Channel Management Policy
- Guidelines for Interaction with Public Officials
- Guidelines for Donations, Sponsorship and Patronage

Responsible Units

Employees: Comply with the guidelines set forth in this policy to prevent corruption and bribery.

Prevention and Compliance Committee: Oversee management against corruption and bribery.

Internal Audit Manager: Conduct regular assessments of anti-corruption and bribery management according to the work plan and provide assurance on the effectiveness of controls and compliance with the policy.

Finance and Accounting Manager: Keep complete and accurate accounting books and records to prevent manipulation and penalties resulting from a lack of internal accounting controls.

Division Managers and Area Managers: Ensure that anti-corruption controls are implemented and enforced in all areas by the staff under their supervision.

Human Development and Management Manager: Maintain the confidentiality of directors, managers and employees regarding all information they provide concerning any reasonable suspicion of corruption or bribery.

International Division Manager: Ensure effective, efficient and timely implementation of the anti-corruption and anti-bribery mechanisms laid out in the policy.

Risk Manager: Manage corruption and bribery risks.

General Manager: Promote and establish an institutional anti-fraud, anti-bribery and anti-corruption culture throughout the organization

Corporate Governance and Legal Manager: Verify the necessary controls with third parties to ensure that contracts can be terminated in the event of any violation of the policy or applicable regulations.

Board of Directors: Regularly review the anti-corruption system and prevention mechanisms.

Definitions

Sponsorship Beneficiary: Individual or legal entity that benefits from the sponsored party through a contribution from the Bank.

Undue Benefit: Any gain (whether monetary or not) including, but not limited to: illegal gratuities, bribes, commissions, gifts, favors, or any other type of direct or indirect benefit such as gifts, hospitality, entertainment, below-market discounts, job offers (whether paid or unpaid), contract awards and other business opportunities, political contributions, expense payments, donations, sponsorships, facilitation payments, and payments for goods and/or services that lack a commercially reasonable justification.

Corruption: Misuse of public or private power to obtain an undue benefit (economic or non-economic; direct or indirect), in violation of ethical principles, duties and standards.

Donations: Contribution of money, goods or services to recipient entities to support a social or socially relevant cause that seeks to serve the public interest, without obtaining any benefit in return.

Fraud: An act in which a person, institution or entity acts illegally or improperly according to established standards with the aim of obtaining some economic benefit.

Definitions (continued)

Public Official:

- Employee or official of a national or foreign government (including departmental or regional, provincial, municipal, and local governments, as well as independent and semi-independent agencies in which the State has a stake, relevant influence or significant influence).
- Any person who exercises, even temporarily or without remuneration, by election, appointment, designation, hiring, or any form of investiture or bond, mandate, position, employment, or service to a national, regional or local government.
- Employee or official of companies partially or wholly owned or controlled by a government or state.
- Employee or official of political parties.
- Employee or official of international public organizations (usually organizations composed of member states, such as the UN).
- Employee or official of state-owned or controlled companies.
- Candidate for public or political office.
- Any person acting as a formal or de facto representative of the persons or entities mentioned above.

Hospitality: These are activities, courtesies, or services provided by the Bank to its clients. They are provided for the purpose of initiating or developing business relationships and without expecting any consideration or value in return.

These may include:

- Meals (breakfasts, lunches and dinners).
- Entertainment activities (invitations to events, concerts, etc.).
- Training sessions, conferences, seminars.

Whistleblower Hotline: The communication channel established by the Bank to receive reports of violation of this policy.

Gifts or Favors: Any item of value, favor, promise of employment, or benefit. These are provided without expecting anything in return. They may include:

- Marketing items bearing with the Bank's trademark.
- Gift cards for use at Intercorp Group companies.
- Travel expenses (e.g., airfare or lodging).

Stakeholders: Individuals or legal entities that have an interest in the Bank, such as shareholders and investors. Stakeholders must comply with this Policy when acting on behalf of, representing, or for the benefit of the Bank.

Sponsored Party: A legal entity to which the Bank provides sponsorship.

Sponsorship: Contribution of money to the Sponsorship Beneficiary through the Sponsored Party for the development and/or execution of sporting, cultural, artistic, academic, or social events or projects.

Third Parties: Any provision of services provided by suppliers, consultants, business partners, contracted or subcontracted third parties, whether individuals or legal entities, regardless of whether a formal contract exists, who use the Bank's name for any purpose or who provide services, supply materials, or interact with the government or other non-governmental entities, while acting on behalf of or for the benefit of the Bank. The provisions of this Policy apply to the fullest extent possible to Third Parties.

Policy Management

The International Division Manager is responsible for the review, update and, as required, amendment of this policy, with the authorization of the Board of Directors, with prior review and approval by the Prevention and Compliance Committee.

Penalties

Failure to comply with this policy will result in penalties and disciplinary measures against employees, directors and Third Parties in accordance with the provisions of the Code of Ethics and Conduct.

The penalty imposed will depend on each individual case and will always be determined in consultation with the Regulatory Compliance and Legal areas. Penalties may range from a severe reprimand to termination of employment. Likewise, civil and criminal actions may be taken. The following are considered very serious offenses:

- Failure to comply with anti-corruption laws and the guidelines outlined in the Anti-Corruption Program may result in significant civil and criminal penalties for both the Bank and the Employees, Stakeholders, or Third Parties involved (including substantial fines and imprisonment), and significant reputational damage.
- Failure by Employees or Third Parties who become aware of potential breaches of the Anti-Corruption Program to report them through the Bank's formal communication channels. This act is not only considered a very serious offense, but will also be subject to disciplinary action.

General Statements

The Bank prohibits all employees, directors or third parties acting on its behalf from engaging in acts of corruption or soliciting and/or accepting bribes.

It is the duty of the International Division Manager, as well as of all employees, to ensure compliance with this policy and to adhere to anti-corruption and anti-bribery regulations. In the event of a conflict between the anti-corruption program and applicable laws, the more conservative position must be adopted.

The Bank is responsible for having due diligence controls in place to assess bribery risk during the process of onboarding clients and recruiting employees, directors and third parties.

Prohibited Conduct

All employees must refrain from:

- Requesting, accepting, offering or giving — either directly or through an intermediary, supplier, or business partner - any payment or gifts of any value. Examples of payment or gifts include:
  - Cash or cash equivalents
  - Gifts, meals
  - Invitations to events or meetings
  - Job offers
  - Business opportunities
  - Personal favors
  - Political or charitable donations
  - Airline tickets, travel, leisure travel, lodging, vacations

Prohibited Conduct (continued)

  - Promotional expenses
  - Sponsorship
  - Community benefits
  - Professional training
  - Club memberships
  - Provide confidential and privileged information
  - All-expenses-paid conferences

- Engaging in any form of fraud, bribery, or corrupt practice, directly or indirectly with public officials to expedite, facilitate, acknowledge, or reward the performance of a routine government action, such as

  - A payment to improperly avoid a fine or taxes.
  - A payment to corruptly influence an official's decision to issue a permit or license.
  - A payment to unduly influence a judicial ruling in favor of the Bank.
  - A payment to a government inspector to disregard regulations or safety and security standards.

- Using the Bank's resources for any illegal, improper, or unethical purpose.
- Using third parties to offer benefits through them that are not permitted within the Bank.

Communication, Confidentiality of Information and Training

The Bank rejects any type of retaliation against whistleblowers who have reported a violation in good faith.

The Bank's Ethical Channel is managed by an independent external firm and accepts anonymous reports.

All employees are responsible for:

- Reporting or filing complaints through the ethical reporting channel provided for this purpose, in accordance with the provisions of this policy, the Know Your Employee policy, and the Code of Ethics and Conduct.
- Refraining from executing purchase or sale transactions, or entering into any transaction related to financial assets or benefits that have not been approved by the Bank, whether conducted in one's own name, through an intermediary or by a third party.

The International Division Manager and the Human Development and Management Manager are responsible for:

- Securely and confidentially managing and handling all information received through the ethical whistleblowing channel regarding possible acts of violation of this policy and anti-corruption regulations.
- Encouraging the use of the established whistleblowing channel to report acts of corruption or suspicion of such acts.
- Maintaining the confidentiality of all information provided about any reasonably founded concerns or suspicions of fraud and bribery.

Communication, Confidentiality of Information and Training (continued)

- Protecting Bank employees against any type of retaliation who report in good faith a violation of this policy, or the commission of any corrupt or bribery conduct.

The General Manager is responsible for:

- Ensuring that criminal offenses are reported to the competent authorities.
- Ensuring that the persons who have been reported have the right of defense, through the presentation of evidence to explain or clarify the conduct.

The Compliance Department is responsible for:

- Providing advice and guidance to the Bank's employees on the Anti-Corruption Program and answering queries made in relation to this policy.
- Providing training at least once a year to employees on corruption risks in their activities. According to the level of exposure to these risks, additional training may be provided.
- Including in the training plan the target audience, the methodology and main topics to be addressed. Appropriate records of training materials and attendance lists shall also be kept.

Control Environment

The Board of Directors is responsible for:

- Ensuring overall compliance with anti-corruption and bribery provisions, as well as providing the necessary resources for their implementation.
- Regularly reviewing the anti-corruption system to validate its compliance, adequacy and continued effectiveness.
- Designating the person in charge of anti-corruption and bribery management.

The Prevention and Compliance Committee is responsible for:

- Overseeing anti-corruption and bribery management.

The General Manager and the Board of Directors are responsible for:

- Ensuring that all fees and expenses paid to Third Parties represent appropriate and justifiable remuneration for legitimate services (to be) provided and shall be paid directly to them.

Division Managers and Area Managers are responsible for:

- Ensuring that the provisions of the anti-corruption policy are implemented and enforced in the departments under their charge.
- Communicating internally the importance of the effective management of the Anti-Corruption Program and compliance with its provisions.
- Leading and supporting Employees in contributing to the effectiveness of the Anti-Corruption Program.
- Communicating externally about the Anti-Corruption Program.
- Ensuring that anti-corruption controls are implemented and enforced in all areas and staff under their responsibility.

Control Environment (continued)

The General Manager is responsible for:

- Allocating appropriate resources and organization to manage compliance with the Anti-Corruption Program.
- Ensuring that the Anti-Corruption Program is established, implemented, maintained and reviewed in a manner that addresses corruption risks.
- Taking the necessary measures to combat fraud, bribery and corruption of any form or type.
- Promoting and establishing throughout all the organization, an institutional anti-fraud, anti-bribery and anti-corruption culture.
- Approving penalties for non-compliance related to this policy.
- Ensuring that the roles and responsibilities of the Anti-Corruption Program are assigned and communicated within and across all levels of the Bank.
- Implementing procedures that are designed to prevent the offer or acceptance of gifts, hospitality, donations and similar benefits where the offer, provision or acceptance is, or could reasonably be perceived to be, corruption or bribery.
- Ensuring the fulfillment of any requirement, request or diligence of a competent judicial or administrative authority in this matter.

The International Division Manager is responsible for:

- Ensuring that the Anti-Corruption Program complies with the requirements of the legislation and regulations applicable to the Bank's operations.
- Ensuring that the provisions of the Anti-Corruption Program are integrated into the company's processes.
- Managing the anti-corruption and bribery prevention system designated by the Board of Directors.

Accounting Books and Records

In compliance with applicable laws, the Bank keeps accounting books and records in an accurate manner so that they reflect all transactions in a transparent manner. Compliance with this requirement is regularly audited (audits may be performed internally or by a vendor assigned by the Bank) and is subject to the Company's internal control procedures.

The Bank prohibits concealed, unrecorded and undeclared transactions. In reference to this instruction, the records of all payments made or received reflect such transaction accurately and appropriately.

All payments to Third Parties or Stakeholders must be accurately recorded, as well as have supporting documentation duly analyzed prior to disbursement, in accordance with the Third Party Corruption Risk Assessment, Mitigation and Monitoring Procedures.

The General Manager is responsible for:

- Maintaining a system of accounting controls to provide reasonable assurance that transactions or acts are properly authorized, executed and recorded.

The Accounting Manager is responsible for:

- Keeping complete and accurate accounting books and records, to avoid manipulations and penalties for lack of internal accounting controls.
- Avoiding making false or misleading statements in any of the records or books or to any person, including internal or external auditors, regarding the Bank's transactions or financial and business affairs.

Risk Identification and Assessment

Division Managers and Area Managers are responsible for:

- Identifying corruption or bribery risks.
- Reporting all identified corruption or bribery risks to the Risk Department so that appropriate assessments can be made and jointly establish controls for the prevention and mitigation of these events.

The Risk Manager is responsible for:

- Regularly validating the risk assessment of the Bank's clients, employees and Third Parties in order to know their business reputation and any relationship with government officials or government entities.
- Ongoing assessment of the anti-corruption program through a risk-based approach that includes assessment of:
    - Type and operations of the business and client relationships or engagements.
    - Location of the business (e.g., client service or business operations located in high-corruption environments).
    - Size or volume of the business.
    - Interaction with the State (e.g., client service or business operations that require interaction with Public Officials).

The Regulatory Compliance Department is responsible for:

- Identifying the sources that have allowed the materialization of any act of corruption and providing feedback to the respective process owners on these vulnerabilities.
- Any other function that may be relevant to reduce the risk of eventual non-compliance with the contents of this policy.

Implementation of Anti-Corruption and Bribery Management

The Board of Directors is responsible for:

- Defining and approving policies and mechanisms for the prevention of corruption or bribery.
- Reviewing the reports and follow up on the comments or recommendations adopted by the Prevention and Compliance Committee, expressly recording them in the respective minutes.

The International Division Manager is responsible for:

- Ensuring effective, efficient and timely compliance with the anti-corruption and bribery mechanisms laid down in this policy.
- Submitting reports to the Prevention and Compliance Committee on compliance and effectiveness of the established mechanisms, as well as the measures adopted to correct the failures of the anti-corruption and bribery mechanisms.
- Recommending to the Bank's Board of Directors and/or General Manager and the CCO the measures that, in their judgment, should be adopted in the event of any failure to comply with this policy.

Monitoring and Follow-up of Anti-Corruption and Bribery Management

The Internal Audit Manager is responsible for:

- Conducting regular assessments of anti-corruption and bribery management, according to its work plan and providing assurance on the effectiveness of controls and compliance with the policy.

Gift and Hospitality Criteria

All Employees and Directors are responsible for complying with the guidelines related to gifts and hospitality.

No employee or director of Inteligo Bank is allowed to offer gifts or hospitality to clients except for the department in charge.

The Bank, its suppliers and third parties are prohibited from accepting or giving:

- Gifts and/or hospitality in cash or in means equivalent to the margin of their amount (e.g., vouchers or gift cards).
- Gifts and/or hospitality of any value from Public Officials.
- Gifts and/or hospitality that create the implied impression or obligation that the giver will be entitled to preferential treatment, improper contracts, more favorable conditions, or some other undue benefit.

The Regulatory Compliance Department is responsible for:

- Approving the annual client loyalty plan.
- Establishing criteria for selecting or approving clients that will receive gifts or hospitality from the Bank. The selection and approval criteria is as follows:

Criteria for Giving Gifts or Hospitality to Clients
◦ Clients who are given gifts must be related to legitimate business objectives, for loyalty purposes or special occasions such as birthdays, Christmas, or commemorative events. ◦ It is prohibited to offer gifts or other benefits to persons, including authorities and political parties, whose values may influence or be considered influential in business decisions. ◦ Not to offer gifts to any client with a regularity or frequency that generates an inappropriate perception or that detracts from the purposes of this policy.

The Regulatory Compliance Department is responsible for (continued):

- Establish the criteria and prohibitions for selecting or approving gifts or hospitality:

Criteria	Prohibitions
◦ **Not be designed to influence the client or be perceived as influencing the client.**	◦ **Not involve cash or cash equivalents (e.g., discounts, gift cards, stock, loans, services).**
◦ Have a reasonable value.	◦ Not made to obtain or retain a particular business or business advantage.
◦ **Offered in good faith and without expectation of reciprocity.**	◦ **Not be motivated by a desire to improperly influence the client.**
◦ Offered in connection with a recognized holiday or event.	◦ Not be offered with a regularity or frequency that creates an inappropriate perception or detracts from the purposes of this policy.
	◦ **It is not done to obtain or exchange favored deals**

The General Manager is responsible for approving gifts that do not meet the criteria defined by the Regulatory Compliance Department.

Monitoring and Control of Gifts and Hospitality

The Regulatory Compliance Department is responsible for:

- Implementing controls to prevent the offering or acceptance of gifts, hospitality, donations, and similar benefits that help identify when these could reasonably be perceived as corruption or bribery.
- Keeping the gift and hospitality report register up to date, which should include the following items:
    - The purpose of the gift
    - Information about the gift recipient:
        - Full name
        - Date of birth
        - Address
        - Indicate if a PEP
    - Type of gift
    - The business area and staff involved in the gift selection and approval process
    - Criteria for giving the gift

The Compliance Department is responsible for (continued):

- Reviewing the database of gift records every six months to mitigate corruption and bribery risks. The items that will be monitored more closely are:
    - Frequency of the gift
    - Total annual amount spent (focusing on PEP clients or public officials)
    - Types and reasons for gifts allowed
    - Maximum cost per gift

Gifts or hospitality received from clients, suppliers or business partners must be refused by the employee and returned. In the event that the gift cannot be returned, it must be immediately reported to the Regulatory Compliance Department so that it can be registered and submitted to an internal draw.

Conflicts of Interest

Employees are responsible for:

- Treating all clients with courtesy, providing them with all required information in a clear, concise, and transparent manner. At no time should preferential treatment be given for personal interests or personal affinity.
- Selecting a supplier to provide a service, and how goods or products will be acquired, must be based exclusively on terms of competitive price, quality and service, as well as rejecting any practice that consists of offering commissions, bonuses or other undue remuneration in order to obtain an illegitimate benefit.

Political Contribution, Regulatory Bodies and Relations with Political and Government Institutions

The Bank is responsible for:

- Refraining from making political contributions or donations to political parties and their related foundations on their behalf.
- Not hiring lobbying or interest representation services to engage with the authorities.
- Sharing its opinions through different associations to try to reach a consensus on the industry's position, provided that this action is in accordance with the principles of action established in its ethical stance and the anti-corruption program.

The Regulatory Compliance Department is responsible for publishing the list of relevant associations to which the Bank belongs.

All employees must refrain from:

- Making on behalf of the Bank any form of contribution to any candidate for political office or to a party in any country.
- Soliciting or inducing members of the law firm or regulatory bodies to act on behalf of the Bank to offer bribes to public officials in order to expedite the processes for which they are responsible.

All employees and Third Parties may:

- Make political contributions only when there is no risk of such contributions being understood or perceived as donations linked to the Bank and/or its interests.

Corporate Guidelines

Interaction with Public Officials

Any interaction with Public Officials represents one of the main ethics and integrity concerns for the Bank, so it is important to consider that any action, decision, behavior or communication, once the relationship with a public entity has been established, could trigger an investigation, penalty or even serious damage to our reputation.

The payment of any undue advantage to Public Officials is prohibited. This prohibition applies regardless of the value, form or type of payment, and includes facilitation payments. Likewise, this prohibition also applies to payments made from Employees' own resources, Third Parties or Stakeholders.

All employees are responsible for promptly reviewing the following situations with regulatory compliance:

- A Public Official or close relative will participate in the corporate structure of a company to be contracted by the Bank.
- A Public Official will solicit contributions, sponsorship, or political contributions.
- A Public Official or close relative will be the final beneficiary of a particular business transaction or financial transaction.
- The Bank or any person on its behalf will meet with a Public Official to discuss a decision thereto.
- The Bank or any person on its behalf will meet with a Public Official to arrange or conduct business of interest thereto.
- The Bank or any person on its behalf will incur expenses related to Public Officials or close relatives, whether or not linked to the regular performance of the Public Official's duties.

There may be other cases, so it is necessary that the Bank's directors, managers and employees strive to identify similar situations and report them to the Regulatory Compliance area. Other cases:

- All meetings with Public Officials must be attended by at least two representatives of the Bank.
- All communications with Public Officials must be made only through official means (official letters or corporate e-mail). Media such as social networks, text messages or personal e-mails are considered unofficial means.
- After interaction with a Public Official, Bank representatives must complete a record that must include at a minimum: place, time, participants, topics discussed, and related expenses, if any.

Third Party Due Diligence and Payments

The Bank is responsible for potential acts of corruption that may be carried out by Third Parties acting on its behalf. It is for this reason that the Bank applies due diligence procedures with the aim of hiring reputable third parties who share our values and agree to comply with the principles set forth in this policy and in the Anti-Corruption Program.

The following are some considerations to take into account in due diligence procedures by the Compliance Department are:

- All Third Parties interacting with Public Officials on behalf of the Bank must be evaluated within 6 months of the issuance of this policy.

Third Party Due Diligence and Payments (continued)

The procedure for evaluating Third Parties shall be defined considering their risk profile. For the evaluation of existing Third Parties, a schedule will be defined for their review.

The Corporate and Legal Governance Manager is responsible for:

- Verifying that Third Party contracts include relevant statements and warranties on anti-corruption conduct. The Bank may dispense with these when a violation of this policy or any applicable anti-corruption law or regulation occurs.
- Validating that Third Parties have signed the anti-corruption clause and that it includes the right to carry out an audit regarding the services provided, and the possibility to interview service providers in case of suspected corruption and to terminate the contract or withhold payment in case of non-compliance.

All Employees are responsible for:

- Reporting the following warning signs to the Regulatory Compliance area:
    - Cases where the Third Party requests that payment be made in a currency other than that of its tax residence.
    - Cases where the Third Party requests payment in cash or has refused to provide an invoice or receipt.
    - Cases where the Third Party requests that payments be made on behalf of an intermediary.
    - Cases where the Third Party has Public Officials as partners and/or executives.

Functions, Acquisitions and Other Investments

The Bank may:

- Acquire and/or have control in other entities. Examples of this activity include acquisitions, mergers, and investments, among others.
- Have a stake in a business. Examples of this activity are joint ventures and limited partnerships.

In order to reduce the risks of corruption and bribery in these transactions, the Bank will apply the due diligence procedure to ensure compliance with applicable anti-corruption laws prior to the conclusion of the transaction.

This procedure will be determined on a case-by-case basis and according to the nature of the transaction, always with the advice of a technical advisor and legal counsel.

Donations and Sponsorships

All employees or Third Parties are prohibited from making donations and granting sponsorships to:

- Individuals.
- Legal entities that have as partners and/or officers relatives of employees in the second degree of affinity of any of the Bank's employees or its former employees and/or employees who have left the company within a period of less than 24 months.
- Legal entities and/or projects with a bad reputation or lack of integrity (e.g., that have already been related to issues of corruption, fraud, exploitation of child labor);
- Legal entities and/or projects that promote or can potentially promote Public Officials.

Donations and Sponsorships (continued)

Donations or sponsorships granted by or on behalf of the Bank are subject to a prior diligence on the beneficiary and prior written approval of the Regulatory Compliance area.

Recruitment Process for Employees and Directors

Hiring of employees and directors can be considered a type of advantage and for this reason, if carried out with the aim of influencing a Public Official, they are considered acts of corruption.

The Human Development and Management Department is responsible for:

- Applying the following rules to recruitment offers (including paid or unpaid work roles or other experience):
    - The Bank and its Third Parties are prohibited from making recruitment offers with the aim of influencing, rewarding or persuading, in any way, a Public Official.
    - Any hiring falling outside the standard hiring process (thus considered the process generally used to select and hire professionals for equivalent level positions) is prohibited. The Bank requires that all hiring be based on merit, that candidates are qualified and eligible, and that there is no preferential treatment.
    - In cases where a candidate or family member is identified as a Public Official during the recruitment process, this must be reported 1to the Regulatory Compliance area for review and approval prior to hiring.
    - In cases where a Public Official recommends a candidate to the Bank, these candidates will be subject to enhanced due diligence and the issuance of any offer must have the written authorization of the Regulatory Compliance area.