

**Credicorp Compliance and Ethics**  
**Program for the Prevention of Market Abuse (PPMA)**  
**Corporate Code of Ethics for Professionals with Financial Responsibility**  
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## 1. INTRODUCTION

- a) This *Corporate Code of Ethics for Professionals with Financial Responsibility* is a complement to Credicorp's Corporate Code of Ethics. It aims at providing additional guidelines for the main executives of Credicorp and its subsidiaries (together, the "Corporation"); as well as for all professionals who work in areas that are involved in the preparation of financial statements and related reports of Credicorp and its subsidiaries; or any other staff able to influence, or involved in the preparation of the Corporation's financial information. The Corporation shall implement internal policies in addition to these standards, as appropriate.
- b) Credicorp expects that the abovementioned staff act pursuant to the highest standards of personal and professional integrity when performing their activities, complying with all applicable laws and regulations; and that they reject and deter others from acting in bad faith.

## 2. SCOPE

- a) In Annex A herein, you may find a list of the Corporation management officers and employees who shall abide by this Code.

## 3. COMPLEMENTARY POLICIES

- a) Employees subject to this Code agree to comply with the following complementary regulations related to:

### 3.1 Conflicts of interest

- a) Performing and promoting an ethic and honest behavior, including ethical management of real or apparent conflicts of interest, that arise from personal and/or professional relationships.
- b) Mitigating the possibility to affect customers' interests as a result of the provision of services.
- c) Avoiding, to the extent possible, exposing the Corporation's officers to conflicts of interests, by properly distributing tasks and responsibilities.

### 3.2 Confidentiality

- a) Implementing all reasonable measures to protect the confidentiality of the Corporation's non-public information; as well as that of its customers, especially when it has been obtained or created in relation to their activities. Furthermore, preventing non-authorized disclosure of such information, except when provided by the law in the country where the Corporation's subsidiaries operate.

### 3.3 Material facts and additional information

- a) The following are deemed as Material facts:
  - Acts, facts, decisions and agreements that may affect the Corporations' and its subsidiaries' financial situation and/or their results.
  - Information affecting -or that may have a significant impact on- the pricing, supply or negotiation of assets or securities listed and traded in the New York Stock Exchange (NYSE), or in the stock markets where the shares of the Corporation's companies are traded.
  - In general, the necessary information for investors to assess the risk involved in the Corporation's operations, its financial situation and the results of its operations, as well as on the securities it has issued.

- b) Those officers responsible for participating in the preparation, generation or submission of Material Facts to the regulating authorities<sup>1</sup>, shall mandatorily send them in a complete, reliable and clear manner, within the timeframe provided by the applicable regulations, through the means established therein and before such information is provided to any other person or media.
- c) Employees shall review, in addition, the “Disclosure of Material Facts” section established in Credicorp’s Corporate Governance Policy.

### **3.4 Reserved and Inside information**

#### **3.4.1 Reserved information**

- a) Classify as “Reserved” any ongoing act, fact, decision, agreement or negotiation, which early disclosure could be detrimental to the Corporation, its shareholders, customers or employees.

#### **3.4.2 Inside Information**

- a) Any information originating from the Corporation, concerning the Corporation, its business, or one or several securities issued or guaranteed by it, which has not been disclosed to the market, and which public availability -due to its nature- will be able to influence liquidity, pricing or quotation of the securities issued. Furthermore, all information that is deemed as inside information by the regulations that apply to the Corporation.
- b) Refrain of using inside information, other than as intended.
- c) Comply with the personal investment guidelines provided in paragraph 7.4 of the Corporate Policy of Specific Conduct for Investments and Finance, which aim at preventing insider trading by those who have access to this information due to their level of responsibilities.

### **3.5 Compliance with laws and regulations to prevent market manipulation**

- a) Avoid any practice that may undermine the free pricing system, or cause an artificial evolution of prices or liquidity in the stock markets (market manipulation).
- b) Contribute to the market’s ability to properly determine the price of the Corporation’s shares or securities, ensuring that information disseminated is truthful, clear, sufficient, timely and quantified, as appropriate.
- c) Clarify or refute false, inexact or incomplete information related to the material facts and other communications, coordinating with the departments indicated in the “Disclosure of Material facts” section established in Credicorp’s Corporate Governance Policy.
- d) Comply with the laws and regulations, related to their professional activities, applicable to the Corporation.
- e) Ensure that no information is concealed and that no actions are taken to fraudulently influence, coerce, manipulate or mislead the Corporation’s external auditors to present misleading financial statements.

## **4. COMPLAINTS AND DISCIPLINARY MEASURES**

- a) Report any facts (insider trading, conflicts of interests, among others), based on solid findings, that mean an alleged breach to the Code hereof, or its complementary regulations. This shall be done following

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<sup>1</sup> For purposes of this Code, regulating authorities are those entities who issue operating and accounting regulations for the Corporation, and to which the Corporation is required to submit financial statements and information pursuant to the established regulations.

the procedures established in the Corporate Policy on Ethics and Conduct and Credicorp's Complaint System.

b) The following are some of the facts that shall be reported:

- Insider trading.
- Market-fixing practices.
- Any fraud or attempt of fraud.
- Disappearance of funds or securities.
- Accounting or financial statement tampering.
- Accounting, financial and/or administrative irregularities, among others.
- Failure to comply with the laws or Credicorp's internal regulations.

c) Violations to the Code may result in disciplinary measures, according to the seriousness and specific analysis of each case. These may go up to employment termination (dismissal), notwithstanding the civil and criminal actions that may correspond.

d) Any question related to the Code hereof may be referred to the Compliance units of Credicorp's companies through the channels they have provided.

## Annex A.

### LIST OF DIRECTORS, MANAGERS AND OFFICERS TO WHOM THE CORPORATE CODE OF ETHICS FOR PROFESSIONALS WITH FINANCIAL RESPONSIBILITY APPLIES.

#### Credicorp Ltd.

##### ***Board of Directors***

- All members of the Board of Directors
- Secretary of the Board

##### ***Management***

- Chief Executive Officer
- General Manager
- Financial Manager
- Insurance Manager
- Audit Manager
- Risk Manager
- Investor Relations Manager

#### Subsidiaries

##### ***Board of Directors***

- All members of the Board of Directors
- Secretary of the Board

##### ***Management***

- General Manager
- Financial and/or Accounting Manager
- Audit Manager
- Risk Manager
- Any employees that may have access, influence or participate in the preparation of financial statements and reports related to Credicorp and/or its subsidiaries.

<b>Document approved by:</b>
Credicorp Ltd. Board of Directors and Grupo Crédito S.A. in the meeting held on 06/23/2022
Regulatory Compliance management