

ANTI-CORRUPTION POLICY

Compliance September 2020

Index

1. Purpose and scope
2. Definitions
3. Guidelines
4. Roles y responsibilities
5. Evaluation of corruption risks
6. Interactions with Public officials
7. Gifts and hospitality
8. Donations and sponsorships
9. Political contributions and relationships with political and official institutions
10. Due Diligence and Third Party Payments
11. Mergers, acquisitions and other investments
12. Accounting books, records and payment practices
13. Hiring process of employees and directors
14. Training and communication
15. Breach report
16. Sanctions
17. Effectiveness, related policies and transitory provisions

1. Purpose and scope

Interbank is committed to conduct its business with the highest ethical standards in compliance with applicable laws, rules and regulations. This commitment is reflected in the "zero tolerance" approach to any act of corruption set forth in our Code of Ethics and in line with the Corporate Compliance Policies of InterCorp Financial Services Inc. (IFS).

The purpose of this Policy is:

- Establish guidelines to identify and prevent potential acts of corruption.
- Provide general information to employees, Third Parties and Interested Parties about Interbank's commitment to anti-corruption practices within the organization and in its relationships with clients, in general with all those with whom, directly or indirectly, a commercial or contractual relationship is established.
- Contribute to the continuity and sustainability of the business by safeguarding the reputation of Interbank.

This policy applies to directors, managers, employees, temporary or contract personnel (collectively referred to as "employees"), and also to Third Parties acting on behalf of or for the benefit of Interbank.

This policy, together with Interbank's internal standards and initiatives define the anti-corruption program seeking to ensure ethical conduct and the implementation of specific controls and procedures aimed at ensuring compliance. In case of doubts about its application, the Ethics and Compliance team should be consulted.

This policy is complementary to the Code of Ethics and defines guidelines for compliance with anti-corruption laws and policies applicable to Interbank's operations, including the The United States Foreign Corrupt Practices Act (FCPA) and Peruvian Law N° 30424.

2. Definitions

a. Undue Advantage

Any gain (whether monetary or non-monetary) including but not limited to: illegal gratuities, bribes, kickbacks, commissions, gifts, favors or any other type of direct or indirect benefit such as gifts, hospitality, entertainment, below-market discounts, offers of employment (paid or unpaid), and other business opportunities, political contributions, expense payments, donations, sponsorships, facilitation payments, and payments for goods and/or services that have no commercially reasonable justification.

b. Willful blindness

Willful blindness is the deliberate ignoring of unethical conduct including acts of corruption.

c. Conflict of interests

Situation in which the activities, relationships or particular interests of a person are incompatible with the interests of the company or the performance of its functions.



d. Corruption

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

e. Due diligence

It's the process of identification, verification and monitoring of the Interested Parties to mitigate the risks of corruption.

f. Extortion

Act of using, directly or indirectly, access to a position of power or knowledge in order to demand an undue advantage, as a result of threats.

g. Lobby

Group of people who carry out actions aimed to influence certain interests.

h. Public official

- Employee or officer of a national or foreign government (including department or regional, provincial, municipal and local governments, independent and semi-independent bodies in which the State has participation, relevant or significant influence).
- Any person who exercises, even temporarily or without compensation, by election, appointment, designation, contracting or any other form of investiture or bond, mandate, position, employment or service to a national, regional or local State.
- Employee or officer of companies partially or wholly owned or controlled by a government or State.
- Employee or officer of political parties.
- Candidate to a public or political position.
- Employee or officer of international public organizations (usually, organizations comprised by member States, such as the UN).
- In the case of public persons who are not on this list, Interbank reserves the right to include them in this definition.

i. Interested parties

Any organization, group or individual that may affect or be affected by Interbank's activities (stakeholders, groups of interest, public of interest, among others).

j. Bribery

Act of offering, promising, delivering, accepting or requesting a payment or thing of value, directly or through an intermediary, for the purpose of obtaining, securing or rewarding an improper, illegal or unethical business, decision, behavior, action or activity.

k. Third parties

This refers to any natural or legal person, national or foreign, public or private, who is not a client or user, with whom Interbank has entered into an agreement of any kind to: Provide a product or service.

- i. Lease, assign or use a movable or immovable property.
- ii. Establish a consortium, conduct business or joint ventures.
- iii. Provide the correspondent agent service.
- iv. Interact on behalf of Interbank with public or private officials.
- v. Act on behalf of or for the benefit of Interbank for any other purpose.



Any other circumstance not indicated in the preceding paragraphs in which there are doubts about the qualification as "Third Party", must be evaluated by the Compliance Officer, who will determine if this Policy will be applicable to the case.

3. Guidelines

- This Policy will be reviewed at least once a year by the Anti-Corruption Compliance Officer to update it, if necessary.
- All acts of corruption, bribery and extortion are prohibited.
- No employee shall offer, promise, give or accept (directly or indirectly) any improper payment, bribe, benefit or other thing of value on behalf of or for the benefit of Interbank to any other person (including Public Officials) or entity for the purpose of obtaining an illegal advantage of any kind. This includes influencing a decision, obtaining or retaining business for Interbank.
- No employee shall request, accept, offer or provide an undue advantage to anyone (including Public Officials, Third Parties, etc.) as a reward for the regular performance of his/her duties or decisions related to his/her position.
- All those representing or acting on behalf of Interbank must comply with this policy, have anti-corruption programs in place and comply with local and international regulations on corruption and bribery applicable to each country. If there is any discrepancy between the Anti-corruption Program and applicable laws, the most conservative position must be adopted.
- Employees or anyone acting on behalf of Interbank must pay particular attention to all interactions with Government Officials. If in doubt, they should contact the Anti-Corruption Compliance Officer.

4. Roles y responsibilities

Directors, managers, employees, temporary or contract personnel (collectively called "Employees") have the obligation to:

- Know and comply with anti-corruption regulations and policies and ensure that all Employees and/or Third Parties under their supervision comply with them.
- Notify and/or report through the available whistleblower hotline any non-compliance with the Anti-Corruption Program.

4.1. Board of Directors

- 4.1.1. Ensure that Interbank's strategy and this Anti-Corruption Policy are aligned.
- 4.1.2. Approve this Anti-Corruption Policy and its updates.
- 4.1.3. Define and approve the risk appetite and general policies of the Anti-Corruption Program.
- 4.1.4. Appoint a person (or persons) responsible for managing the Anti-Corruption Program.
- 4.1.5. Periodically review the operation of the Anti-corruption Program.

4.2. General Management

- 4.2.1. Allocate resources for compliance and enforcement of the Anti-Corruption Program.
- 4.2.2. Oversee that the Anti-Corruption Program is established, implemented, maintained and regularly reviewed so that it addresses corruption risks.
- 4.2.3. Promote the anti-corruption culture within Interbank.



4.3. Senior Management

- 4.3.1. Oversee that the provisions of this Anti-Corruption Policy are implemented and complied within the departments they are responsible for.
- 4.3.2. Communicate internally the importance of effective management of the Anti-Corruption Program and compliance with its provisions.
- 4.3.3. Lead and support Employees to contribute to compliance with the Anti-corruption Program.

4.4. Chief Compliance Officer (CCO)

- 4.4.1. Design the Anti-corruption Program and supervise its implementation.
- 4.4.2. Ensure the execution, compliance and continuous improvement of the Anti-corruption Program.
- 4.4.3. Ensure consistency between the Interbank Anti-Corruption Policy and the IFS corporate policy.
- 4.4.4. Regularly report to the Board of Directors and the General Management on the performance of the Anti-Corruption Program and submit reports of acts of corruption or suspicion of such acts.
- 4.4.5. Recommend the Audit Committee, General Manager and/or the Board of Directors the measures that, in his/her opinion, should be adopted in case of an eventual breach of this policy.
- 4.4.6. Any other duty that could be relevant to reduce the risk of eventual breaches of the contents of this policy.

4.5. Anti-Corruption Compliance Officer

- 4.5.1. Develop and implement the guidelines established in this Policy and promote compliance by Employees and Third Parties.
- 4.5.2. Ensure the execution, compliance and continuous improvement of the Anti-Corruption Program.
- 4.5.3. Periodically inform to the CCO on the operation of the Anti-Corruption Program.
- 4.5.4. Review this Policy and guidelines at least once a year in coordination with the CCO.
- 4.5.5. Ensure that the anti-corruption program meets the requirements of the legislation and rules applicable to the operations of Interbank.
- 4.5.6. Supervise that the provisions of the Anti-Corruption Program are integrated into Interbank's processes and report when applicable.
- 4.5.7. Recommend the CCO the measures that, in his/her opinion, should be adopted in case of an eventual breach of this Policy.
- 4.5.8. Provide advice and guidance to Employees on the Anti-Corruption Program and answer any questions they may have in relation to this Policy.
- 4.5.9. Promote the use of the complaint channels established to report acts of corruption or suspicion thereof.
- 4.5.10. Promote a culture of prevention that includes the confidentiality of complaints and non-retaliation against those who provide information on acts of corruption.
- 4.5.11. Determine the actions to be taken in response to reports about acts of corruption of which it is aware and coordinate the appropriate investigations with the person in charge of Ethics.
- 4.5.12. Any other duty that could be relevant to reduce the risk of eventual breaches of the contents of this policy.

5. Corruption Risk Assessment

The Anti-corruption Program must be continuously evaluated through a risk-based approach that includes the evaluation of:



- Business type and operations and the relationships or commitments with Interested or Third Parties emphasizing interaction with Public officials.
- Business location, size or volume (e.g.: customer service or business operations located in high corruption environments).
- Interaction with the State (e.g., client service or business operations that require interaction with Public Officials).

6. Interactions with Public officials

Interaction (or the possibility of interaction) with Public Officials represents one of the main corruption risks for Interbank. Any relationship with public entities and their officials who fail to comply with the provisions of this Policy could result in an investigation, sanction or even damage to our reputation.

Taking into consideration the above, 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 with own resources from Employees, Third Parties or Stakeholders.

The following are examples of situations that Employees should promptly review with the Ethics and Compliance team:

- A Public Official or close relative participates in the corporate structure of a company to be contracted by Interbank.
- A Public Official will request political contributions, sponsorship or contributions.
- A Public Official or close relative shall be the final beneficial owner of a particular business transaction or financial transaction.
- Interbank or any person on its behalf will meet with a Public Official to discuss a decision or business of their interest.
- Interbank or any person on its behalf shall incur expenses related to Public Officials or close relatives, whether or not related to the regular performance of the Public Official's duties.

The situations previously presented or others that may arise must be reported to the Ethics and Compliance team.

Interbank's Employees must take into account, as a minimum, the following guidelines when interacting with Public Officials:

- All meetings with with Public Officials must be attended by at least two Interbank representatives.
- The Anti-Corruption Compliance Officer together with the Division Managers will define the cases in which the attendance of a control officer to meetings with Public Officials is warranted.
- All communications with Public Officials must be made only through official means (official letters or corporate email). Media such as social networks, text messages or personal emails are considered non-official means of communication.



- After the interaction with a Public Official, Interbank representatives must complete a record that must include at a minimum: place, time, participants, and topics discussed and related expenses, if any.

7. Gifts and hospitality

Gifts and hospitality are considered a courtesy that is given or received, free of charge and voluntarily, for the purpose of promoting business relationships with clients, suppliers and/or Third Parties in general. Gifts and hospitality include entertainment, travel, invitations to events, meals, business meetings, training and conferences, among others.

They are generally accepted when they occur on an exceptional basis, without specific periods or events and when they are secondary to the establishment and maintenance of business relationships, provided that they are not intended to influence (or create the appearance of influencing) the recipient to take an action or make a decision for the benefit of Interbank or the Employee.

Gifts and hospitality may be considered as something of value and, consequently, as an undue advantage, depending on their characteristics, frequency, destination, purpose, location, recipient, among other factors.

Interbank and its Third Parties are prohibited from accepting or granting gifts and/or hospitality:

- In cash or equivalent means regardless of the amount (e.g., coupons or gift cards).
- Of any value from/to Public Officials.
- Giving the implicit impression or obligation that the person giving it will be entitled to preferential treatment, improper contracts, more favorable terms or any other undue advantage.

In the case of Public Officials, exceptionally, when the applicable regulations allow it, the offer or delivery of gifts or hospitality may be made with the prior written authorization of the CCO and/or the Anti-Corruption Compliance Officer, in agreement with the General Manager and/or the corresponding Vice President, as long as the following criteria are respected:

- All requirements of the regulations applicable to gifts and/or hospitality for Public Officials are complied with.
- Gifts and/or hospitality are not offered with the intention of influencing the Public Official or giving the appearance that they will influence the Public Official.
- Expenses on gifts and/or hospitality are in accordance with the guidelines supplementary to this Policy and that there is a record of the same.
- All gifts and/or hospitality are recorded.

8. Donations and sponsorships

Donations are intended to grant economic support to a social or socially relevant cause, without expecting anything in return.



The purpose of the sponsorship activity is to grant financial support to the sponsored parties for sports, charitable, cultural, scientific or similar activities.

Donations and sponsorships are considered a legitimate way of promoting actions of interest to a particular community. However, they may present corruption and reputational risks considering that:

- Donations can be used as a vehicle to disguise resources that are transferred for corruption, either because the receiving institution or cause is inappropriate or because the funds being transferred are intended for a Public Official.
- Sponsorships can be misused to improperly influence a Third Party, especially if the sponsored party is of interest to a Public Official.

Therefore, Interbank or Third Parties on behalf of Interbank are prohibited from granting donations or sponsorships to:

- Natural persons.
- Legal entities that have as partners and/or officers relatives of employees and former employees in the second degree of consanguinity and affinity in Interbank, IFS or any of its subsidiaries. For these purposes, former employees who have left the company in a period less than or equal to 24 months will be considered.
- Legal entities and/or projects with a bad reputation or lack of integrity (e.g., that have been related to corruption or fraud issues).
- Legal entities and/or projects that promote or could potentially promote the political activities of Public Officials.

Donations or sponsorships granted by or on behalf of Interbank are subject to prior due diligence of the beneficiary and the written approval of the CCO and/or the Anti-Corruption Compliance Officer, in coordination with the General Manager and/or the corresponding Vice-Presidency.

9. Political contributions and relationships with political and official institutions

Interbank does not make political contributions or donations to political parties and their related institutions and prohibits its Employees and Third Parties from making such contributions on its behalf.

Third Parties and Interbank's Employees may make political contributions in their personal capacity only when there is no risk that such contributions may be understood or perceived as donations linked to Interbank and/or its interests.

Interbank shall not retain lobbying or interest representation services to engage with Public Officials.

Interbank may share its opinions through different trade associations to try to reach a consensus on the position of the industry, as long as this action is in accordance with the Code of Ethics and the Anti-Corruption Program.



10. Due Diligence and Third Party Payments

Interbank may be accountable for acts of corruption that may be performed by Third Parties when acting on its behalf or representation. Therefore, Interbank must perform due diligence procedures for the hiring of Third Parties that meet ethical standards and in line with this Policy.

Areas who contract a good/service from a Third Party, must comply with the following guidelines:

- Comply with due diligence guidelines for Public Officials and Third Parties
- Interbank will define the due diligence procedure for the evaluation of Third Parties considering their risk profile.
- Contracts with Third Parties shall include an anti-corruption clause that contemplates the possibility of auditing and/or requesting information regarding the services provided, also considering the possibility of interviewing Third Parties in case of suspicion of corruption and of terminating the contract or withholding payment in case of non-compliance.
- Additionally, some examples of warning signs that should be reported through the available whistleblower channels are detailed below:
 - The Third Party requests that the payment be made in a currency other than that of its tax residence.
 - The Third Party requests that the payment be in cash or has refused to provide an invoice or receipt.
 - The Third Party requests that the payments be made on behalf of an intermediary.
 - The Third Party has Public Officials as partners and/or executives.

11. Mergers, acquisitions and other investments

Interbank may

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

In order to reduce the risks of corruption in these transactions, Interbank will apply the due diligence procedure to ensure compliance with applicable anti-corruption laws before the transaction is concluded.

This procedure will be determined for each case and according to the nature of the transaction always with the guidance of a technical and legal advisor.

12. Accounting books, records and payment practices

In compliance with applicable laws, Interbank keeps accounting books and records accurately so that they transparently reflect all transactions. Compliance with this requirement is periodically audited (the audits may be conducted internally or by a supplier assigned by Interbank) and is subject to the company's internal control procedures.



Interbank prohibits operations that do not reflect the nature of the transaction, unrecorded and undeclared. In reference to this instruction, records of all payments made or received must be reflected in an accurate and appropriate manner.

All payments to Third Parties or Interested Parties must be accurately recorded, as well as have supporting documentation duly analyzed prior to disbursement.

13. Hiring process of employees and directors

The hiring of employees and appointment of directors must be carried out in line with this Policy in order to mitigate corruption risks.

Interbank will not hire employees or directors who have been convicted or are in the process of being prosecuted for acts of corruption.

The following rules should apply to offers of employment (including paid or unpaid job functions or other work experience)

- Interbank and its Third Parties are prohibited from making offers of employment for the purpose of influencing, rewarding or persuading, in any way, a Public Official.
- Any recruitment outside the regular selection process is prohibited. Interbank requires that all recruitments be made on the basis of merit and that candidates be qualified and eligible without any preferential treatment.
- In cases where a candidate or family member is identified as a Public Official during the recruitment process, this must be reported to the Compliance Area for review and approval prior to hiring.

14. Training and communication

Interbank trains its Employees at least once a year on the Anti-Corruption Program.

The training plan in charge of the Ethics and Compliance team will include the target audience, the methodology and the main topics to be addressed.

An appropriate record of training materials and attendance lists will be kept. Employees who do not take the mandatory training will be sanctioned.

In order to carry out the indicated training, the following modalities are available:

- Virtual training (e-learning).
- Face-to-face training (general, in groups, specialized).
- Newsletters



15. Non-Compliance Reporting

Any employee, Third Party or Stakeholder who has knowledge, suspicions of non-compliance or inappropriate behavior with the Anti-Corruption Program is obliged to report it through the available whistleblower channels.

Interbank's Whistleblower Hotline is intended for anonymous reports of any inappropriate behavior. This can be done through the web <https://interbank.pe/canal-etico>.

Interbank rejects any retaliation whatsoever against whistleblowers who in good faith have made a report of non-compliance.

16. Penalties

The following are considered as very serious misconduct:

- a) Failure to comply with the anti-corruption laws and the guidelines described in the Anti-corruption Program since it could result in significant civil and criminal sanctions both for Interbank and for the Employees, Stakeholders or Third Parties involved (including material fines and prison), and in a significant damage to reputation
- b) Employees or Third Parties incurring in willful blindness, i.e., becoming aware of potential breaches of the Anti-Corruption Program and not reporting them through the available whistleblower hotlines.
- c) Any Employee and/or Third Party who misleads and/or obstructs investigations into potential breaches of the Anti-Corruption Program. This act is not only considered as a very serious offense, but will be also subject to a disciplinary action.

The Ethics and Compliance team must ensure that applicable disciplinary measures are taken. These may consider:

- (i) The application of a severe warning up to separation or termination of contracts with Third Parties.
- (ii) The possibility of not receiving variable income (for example: performance bonuses, sales bonuses, among others) or application of penalties to Third Parties.
- (iii) The possibility of taking civil and criminal actions, if necessary.

Additionally, they will be subject to disciplinary measures and other remedial measures applicable to:

- Employees and / or Third Parties that retaliate against those who provide information on acts of corruption.
- Any Employee and/or Third Party who induces to error and/or hinders the investigations on potential breaches of the Anti-corruption Program.
- Employees and/or Third Parties who do not carry out mandatory training.



17. Effectiveness, related policies and transitory provisions

The Anti-Corruption Policy enters into effect as from the approval of the Interbank Board of Directors.

This Policy prevails over any other internal document that is less strict and, therefore, it must be available to all Interbank Employees, Interested Parties and Third Parties and published on its website.

The complementary guidelines to this document will be approved within a period of twelve (12) months after the approval of this Policy.

All the prohibitions and provisions indicated in this Policy are effective, regardless of the publication and/or effectiveness of their related Reference Policies.

