



Interbank Code of Ethics

Our commitment to integrity

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1. Message from Luis Felipe

"To be the Best Bank" involves:

- Having satisfied employees and customers
- Being a profitable and sustainable bank, contributing to the development of Peru

To have **"the Best People"** involves:

- Having high-performing employees
- Having employees committed to our culture, values and purpose

To fulfill our vision, we must keep in mind that Interbank's sustainable growth requires us to act with purpose, commitment and, above all, **ethics and integrity**.

We are convinced that to contribute to the country's development, we must act with transparency and honesty. We firmly undertake this commitment with our stakeholders, including our employees, clients, users, suppliers, third parties, government entities, shareholders, and society in general.





Interbank has grown along with Peru's economic development, therefore, we have evolved as well. The digital environment in which we work today brings us new and increasing number of challenges to be conquered. However, our values and our way of doing things with integrity, the value that inspires this Code, remain constant over time.

This document is the instrument that represents our commitment to the country, what we expect of ourselves and our stakeholders. Only conducting ourselves with integrity will take us a step closer to fulfilling our vision.

We firmly belief that, acting correctly is the way in which each of us can help build **the country we dream of today.**

Luis Felipe
#siempreconetica





2. Purpose

The purpose of our Code of Ethics is **to encourage and promote** the principles and conducts we expect from our employees and stakeholders, seeking **to prevent and avoid inappropriate behavior**.

3. Who is this code for?

This Code of Ethics applies to all directors and employees of Interbank, its subsidiaries and branches abroad.

Likewise, we expect our clients, users, suppliers, and third parties to act in a manner that is consistent with the principles and values of this Code.



4. What does ethical management means?

Ethics is the **decision to do the right thing by** considering our principles and values in each situation. Ethical management also involves taking a leading role in spreading ethical behavior, as well as identifying and reporting behaviors against the principles of this Code.

The decisions we make every day are based on ethics. Under normal circumstances, we can easily decide between right and wrong; however, situations sometimes arise where it is not so easy to make a decision. In such complex situations, we invite you to reflect and ask yourself the following questions:



1. Is my behavior aligned with **Interbank's culture**?
2. Will my decision or behavior affect other people?
3. How would I feel if I was instead of the other person?
4. What are the possible consequences of my actions?
5. By doing this... am I getting closer to the person I want to be?
6. Would my family and friends be proud of me?



Even in certain situations we might seek to justify ourselves by saying:

- One time doesn't matter.
- No one will notice.
- Everyone else does it.
- This is nothing compared to what others do.
- If he or she does it, it's not my problem.

If you answered **"No"** to any of the questions or considered any of the above phrases to justify your decision or someone else's, it is likely that you require support to make a decision or should report any incorrect or unwanted behavior.

In such cases, you need to approach your immediate supervisor, team leader, Compliance Officer, or contact the Whistleblower Hotline.



5. Avoid “willful blindness”

Another way of ethical **management is to actively encourage** your colleagues to act in alignment with this Code and report misconduct or misbehavior. “Willful blindness” refers to being aware of unethical conduct or inappropriate action and **deliberately ignoring it**. Failure to report this conduct makes you complicit, this is the same as if you participated in its execution.



Mario, a bank employee, serves a client who is collecting a foreign transfer and informs him that he can only collect the money if he "opens a savings account and keeps the deposit for one day". Mario gives false information in order to receive a bonus for opening an account, as this is not a requirement for the collection of transfers. George, Mario's colleague, overhears the whole conversation, but decides not to say anything because they are "friends".

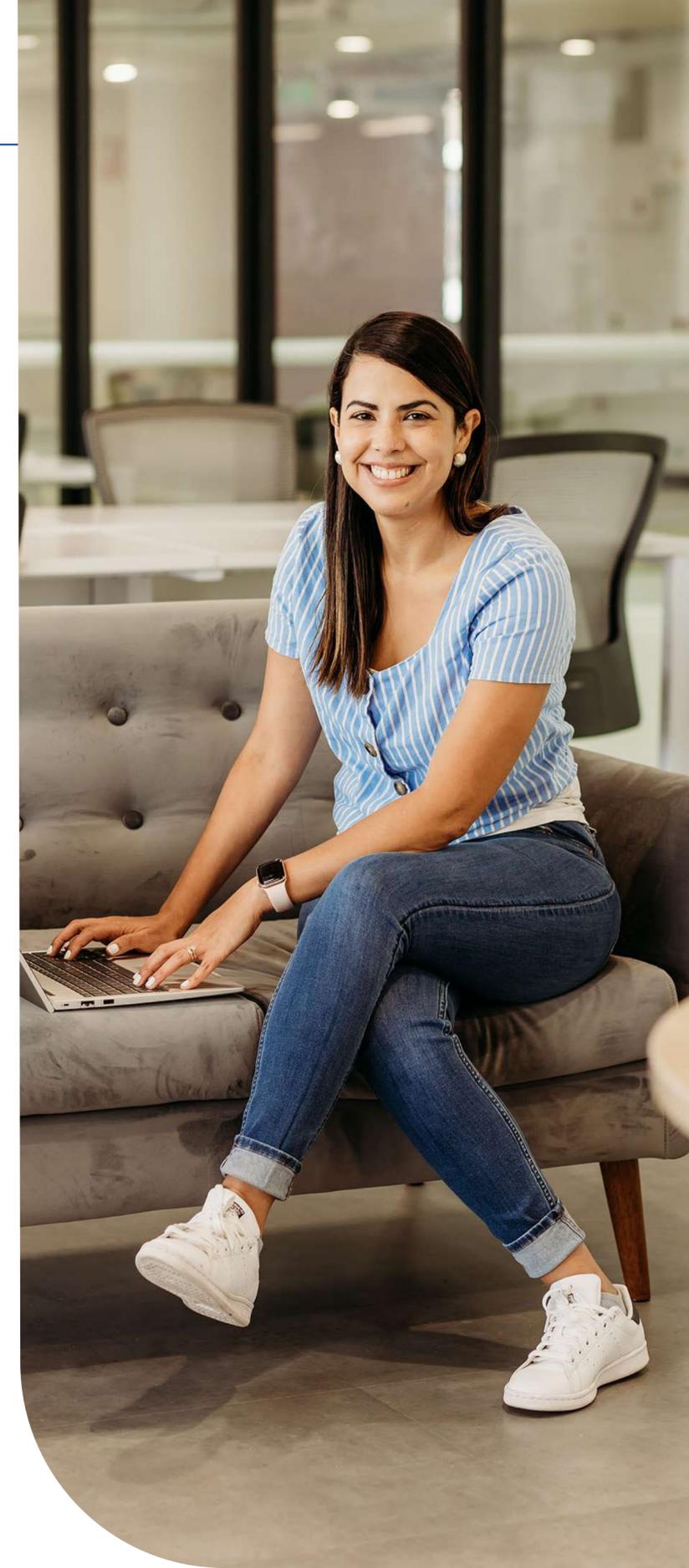
George is Mario's accomplice and is responsible for this improper action by not reporting it in a timely manner.



6. Interbank's ethical principles

At Interbank, we manage our business through the following ethical principles:

- Being **HONEST**, always acting with integrity.
- **COMPLYING** with the rules and commitments we make to others.
- Being **TRANSPARENT** when handling information.
- **RESPECTING** differences and diversity, promoting fair and respectful treatment toward others.
- **ACTING** responsibly and diligently to successfully address day-to-day situations.
- Doing the **RIGHT THING** in a fair manner, always putting ourselves in the position of "the other" at all times and in all places.
- **REPORTING** any inappropriate behavior and consulting through the appropriate channels when in doubt.



7. Whistleblower hotline and protection

All our employees, suppliers, clients, and third parties, among others, have access to the channels implemented to report any inappropriate behavior, through the website <https://interbank.pe/canal-etico> 

At Interbank we have a **ZERO RETALIATION** Policy; all reports play a fundamental role in maintaining an environment of integrity and prevention. It is everyone's job to create a safe work environment in which we can report unethical behavior in good faith. At Interbank, we do not retaliate against those who report conduct that infringes this Code, even if it is later found to be only apparent.

Reports will be handled with confidentiality and can be made anonymously. To ensure integrity and confidentiality, the Whistleblower Hotline is managed by an independent and specialized company, which is responsible for forwarding the reported cases to the responsible areas.



8. Ethics committee

The purpose of the Ethics Committee is to oversee the management of this Code of Ethics.

Its main functions include:



Oversee compliance with this Code, ethics policies and guidelines



Review and monitor the initiatives and work plans submitted to the Committee



Decide on corrective actions, where applicable



The Ethics Committee is comprised by:

- CEO
- A Director
- Chief Compliance Officer
- Human Resources Manager
- Vice President, Corporate and Legal Affairs
- Vice President, Retail Business and Channels
- Internal Audit Division Manager
- Compliance and Ethics Management Officer

9. Responsibility and disciplinary measures

Ethical principles must be complied at all times, inside and outside Interbank's facilities, 24 hours a day, 7 days a week.

If a breach of this Code is determined, **appropriate disciplinary measures** will be applied in accordance with the provisions of our Internal Labor Regulations, which may range from a reprimand to dismissal or termination.



10. Our commitment to integrity

10.1. Commitment to Diversity, Equal Opportunity and Respect

We promote fair, equitable and respectful treatment, maintaining an inclusive environment, free of discrimination, harassment, violence or any conduct that threatens human dignity and integrity.

How do we live our commitment?

- By recognizing and promoting human and labor rights in line with international standards.
- Working as a team, valuing the different opinions and contributions of all.
- Providing fair and respectful treatment to all employees, suppliers, clients, and users, inside and outside Interbank's facilities.
- Encouraging the professional growth of our employees based on objective and transparent evaluation criteria.
- Immediately reporting any behavior that threatens our commitment to diversity, equal opportunity and respect.





What is prohibited?

- Aggressive and/or negative behavior, verbal or physical; aimed for intimidating, hurting, frightening, threatening or intentionally excluding any person.
- Any form of forced or compulsory labor, as well as child labor.
- Any form of hostile or offensive treatment by any means.
- Sexual advances, sexually offensive acts and comments, sexist, indecent or obscene conversations, gestures, and comments.
- Any kind of discrimination or segregation based on race, ethnic background, sex, gender identity or expression, age, religion, nationality, academic level, political affiliation, disability, marital status, sexual orientation, economic status or any other characteristic.





*Joe is my colleague, in recent weeks I have noticed that he makes homophobic jokes. Last week he made jokes about my sexual choice in a team meeting, all of this causes me discomfort. **What should I do?***

You should talk to Joe and inform him that his behavior is inappropriate and makes you uncomfortable. You may also report this behavior to the Whistleblower Hotline anonymously or talk to your manager or to the Human Resources Development and Culture area.

Learn more here:

- Diversity Policy
- Human Rights Policy



10.2. Commitment to a Safe and Healthy Environment

We are convinced that we can carry out our operations and business in a safe and healthy manner, taking care of our employees and other stakeholders.

How do we live our commitment?

- By providing our employees, suppliers and visitors with safe and healthy environments in which to carry out their activities.
- Taking action or reporting identified risks or accidents in a timely manner.
- Immediately reporting any behavior of employees or visitors that threatens a safe and healthy environment for all.



What is prohibited?

- Any risky behavior that may threaten the safety and health of employees, suppliers or visitors, as well as Interbank's facilities.
- Working or entering the facilities under the effect of toxic substances or, consuming alcoholic beverages, drugs or narcotics for the performance of your duties.





...Gabriela is a financial representative of a two-story store. While walking down the stairs she slipped, fell and hit her head causing a bruise on her forehead. Gabriela says she feels fine, and that she will go to a health care facility later to check the bruise because she now has to close a transaction.

Gabriela should stop what she is doing and go to the nearest health care facility immediately. Also, her boss and the Occupational Safety and Health Committee should be notified immediately.

Learn more here:

- Interbank's Occupational Health and Safety Regulations



10.3. Commitment to Integrity in Financial and Operational Reports

Our records reflect the Bank's business, accounting and financial situation.

How do we live our commitment?

- By maintaining the integrity and transparency of the information we record and report.
- Recording data, agreements, transactions, operations and business, financial and non-financial reports accurately, timely, clearly, and completely.
- Recording information in compliance with applicable rules, accounting practices and standards.
- Reporting any known manipulation or concealment of financial information and operational reports.



What is prohibited?

- Falsifying or manipulating financial reports of Interbank or its subsidiaries.
- Deliberately recording incorrect accounting entries, audit reports or operational errors, such as fraud or non-compliance with regulations.



Did you know that...:

...giving false information about financial or accounting statements is not only an ethical misconduct, but also a crime punishable by imprisonment?

Criminal laws punish with imprisonment the fraudulent management of companies, including the issuance of distorted audit reports.



10.4. Commitment to Honesty

We are confident that we will achieve our purpose, mission and vision by relying on honest employees in any circumstance that may arise.

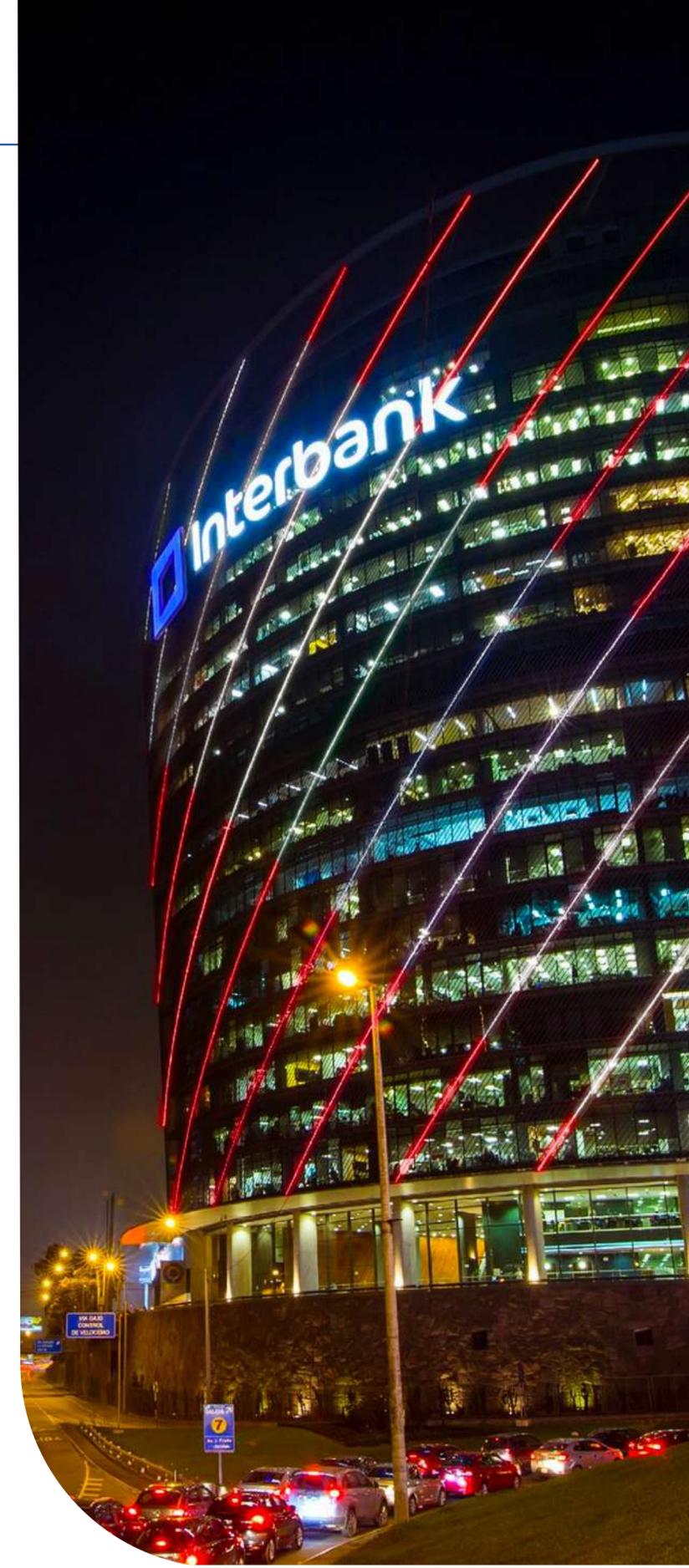
How do we live our commitment?

- Rejecting any dishonest acts such as fraud, theft, misappropriation or misuse of resources of the Bank, clients and/or the general public.
- Acting with integrity and transparency, not lying, concealing, altering or omitting information to the Bank, clients or third parties for one's own benefit or for the benefit of third parties.
- Reporting any dishonest act.



What is prohibited?

- Fraud, falsification and/or adulteration, simulating transactions, recording false information in systems and/or providing false information, deceiving employees, clients or third parties, adulterating physical or electronic documents, generating or taking advantage of errors or omissions in procedures, systems, ATMs or virtual media to obtain personal benefits or in favor of third parties.
- Stealing money or goods belonging to Interbank, clients, employees, suppliers and other persons, appropriating excess payments, failing to declare an excess or withdrawing money from your cash drawer or petty cash to attend to personal matters, even temporarily.
- Improperly using property assigned by Interbank for personal use or for third parties or for purposes unrelated to your work.
- Inciting others to perform dishonest or fraudulent acts.
- Misleading or coercing clients or third parties to contract products or services by providing inaccurate or false information.



Reflection



Mary has just joined a new branch. To receive additional bonuses, a colleague suggests that she tell clients that "you can only open an account with the bank if you take out debit card insurance", Mary knows that this information is false.

After thinking it over, she decides to report this malpractice to the Whistleblower Hotline. Thanks to this report, it was possible to identify two employees that engaged in this malpractice to the detriment of clients.





10.5. Commitment to Information Security

We value the trust placed in us by our clients, employees, suppliers, and other stakeholders when they provide us information. We respect the confidentiality commitments we make to them and undertake to treat such information with high security standards.

How do we live our commitment?

- Keeping confidential information of Interbank, its shareholders, employees, clients, suppliers, and related third parties confidential.
- Using the information to which we have access for the exclusive purposes of our functions and, in no case, to obtain benefits from it.
- Safeguarding Interbank's intellectual property, information systems, commercial strategies, and the work done by our employees.
- Reading and complying with the guidelines issued by Interbank to preserve privileged information, personal data, and other information that is confidential, restricted or for internal use.
- Reporting any misuse or risk of information leakage.



What is prohibited?

- Using, appropriating, disclosing or improperly treating information to which you have had access for personal benefit or for the benefit of third parties or for any other purpose other than your work or assignments.
- Disclosing to third parties information protected by regulations governing bank secrecy, protection of personal data, use of privileged information and other information protected by special regulations.
- Disclosing business strategies, campaign data, market strategies, strategic plans, ongoing negotiations or other Interbank information.
- Deliberately or negligently using or sharing your physical or digital accesses, keys or passwords that have been granted to you personally for the performance of your duties.

Reflection



Richard is a frequent client of the bank and is always accompanied by his son to make withdrawals from his individual savings account. On one occasion Richard's son approaches the bank alone, and requests his father's savings account transactions. Lucia, a financial representative who frequently attends them, is not sure if she should provide this information, so she consults with the bank manager.

Frank, the bank manager, reminds Lucia that Richard's account information is protected by bank secrecy, so she cannot give it to anyone, even a close relative.

Learn more here:

- Information Protection Guidelines
- Personal Data Protection Manual
- Privileged Information Guidelines



10.6. Commitment to Represent Interbank Responsibly

We represent Interbank in a responsible manner, even in non-bank environments.

How do we live our commitment?

- Reflecting Interbank's values and principles at all times, behaving correctly in work, social and family environments.
- Making responsible use of personal and corporate social networks.
- Reporting any action that threatens Interbank's reputation.
- Respecting the right of our employees to participate personally in activities of different religious, educational, political and other organizations.



What is prohibited?

- Carrying out any action, statement or public declaration that may compromise Interbank's reputation and image.
- Representing Interbank in public events or making statements or declarations on behalf of the Bank without the express authorization of the Bank's senior management (Manager, Vice President, or General Manager), depending on your position.
- Compromising Interbank's image in activities of political, sports or social nature, as well as offering or making political contributions in Interbank's name to positions or acts carried out by candidates, parties, or political organizations. These activities must be carried out in a personal capacity.
- Any behavior or statement disseminated through physical or digital mass media, as well as in social networks, that undermines the image or reputation of Interbank even if it has been made in a personal, social or family sphere.



Mike has been an employee of the bank for 15 years; he is recognized in the market as an excellent professional in the financial sector. A political organization has invited him to a public event to present his perspective on the growth of the sector in the next 3 years. Mike asks his vice president if he can attend the event.

The vice president tells Mike that he can give the talk, but reminds him that he must attend the event in a personal capacity, at no time should he appear as a representative of the bank, nor should he compromise Interbank in his opinions and statements.



10.7. Commitment to Avoid Conflicts of Interests

Un conflicto de intereses se presenta cuando tus actividades o relaciones personales son incompatibles o colisionan con el ejercicio objetivo de tus funciones como colaborador y/o los intereses de Interbank.

How do we live our commitment?

- By selecting employees, suppliers and other interested parties based on their knowledge, experience, technical and service quality, reputation, and merit.
- Not allowing our emotional relationships and personal interests to interfere in our decisions in the performance of our duties and in our business relationships with suppliers, clients or other stakeholders.
- Refraining from making decisions related to Interbank if we have a family or friendly relationship with an employee, supplier, client or other stakeholder.
- Immediately disclosing any cases that may involve a conflict of interest.
- Properly managing our personal finances, avoiding being over-indebted and being up to date in our obligations with other creditors.
- Requesting the approval of the vice president, CEO and/or manager, before accepting a proposal for the position of officer or director of an external company or providing professional services to third parties.



What is prohibited?

- Intervening in hiring or selection processes involving family members or friends.
- Selling products or carrying out transactions to relatives when it is prohibited by any guideline.
- Conducting business or meetings with other employees, clients of the Bank or other stakeholders, when this may affect the work environment, hinder the performance of your duties or objective decision making.
- Maintaining sentimental relationships with employees or suppliers with whom there is a direct or indirect relationship of control, subordination or dependence, as well as in other cases in which this may hinder the performance of your duties or objective decision making.
- Being a shareholder, director, representative or having a direct economic relationship with any Interbank supplier, without having the respective authorization when your duties are related to the service provided by such supplier.
- Handling your personal finances irresponsibly, being over-indebted or having a "deficient", "doubtful" or "loss" rating in credit bureaus.





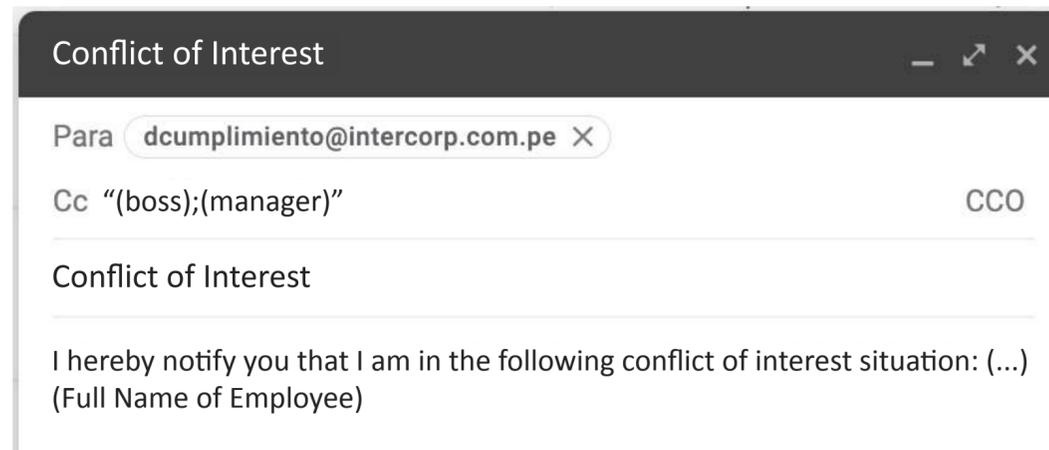
A support department needs to contract a technology service, and commissions Sandra, a purchasing analyst, to evaluate the proposals submitted by suppliers. During the evaluation, Sandra notices that her brother Peter is participating in the process through his company TECNOMAR SAC.

What should Sandra do in this situation?

Sandra should refrain from participating in the process and report the case to her direct boss, her manager and the Compliance Division so that they may assign another analyst for the evaluation.

Important:

In case you find yourself in a situation that involves a conflict of interest, you must report it to the Compliance Division email (Dcumplimiento@intercorp.com.pe), with a copy to your boss and corresponding manager:



Learn more here:

- Anti-Corruption Policy
- Supplier Contracting Manual



10.8. Commitment to Free and Fair Competition

We manage our business, committed to respecting free competition, always seeking benefits for the market, promoting the improvement of products and services, and fostering continuous innovation.

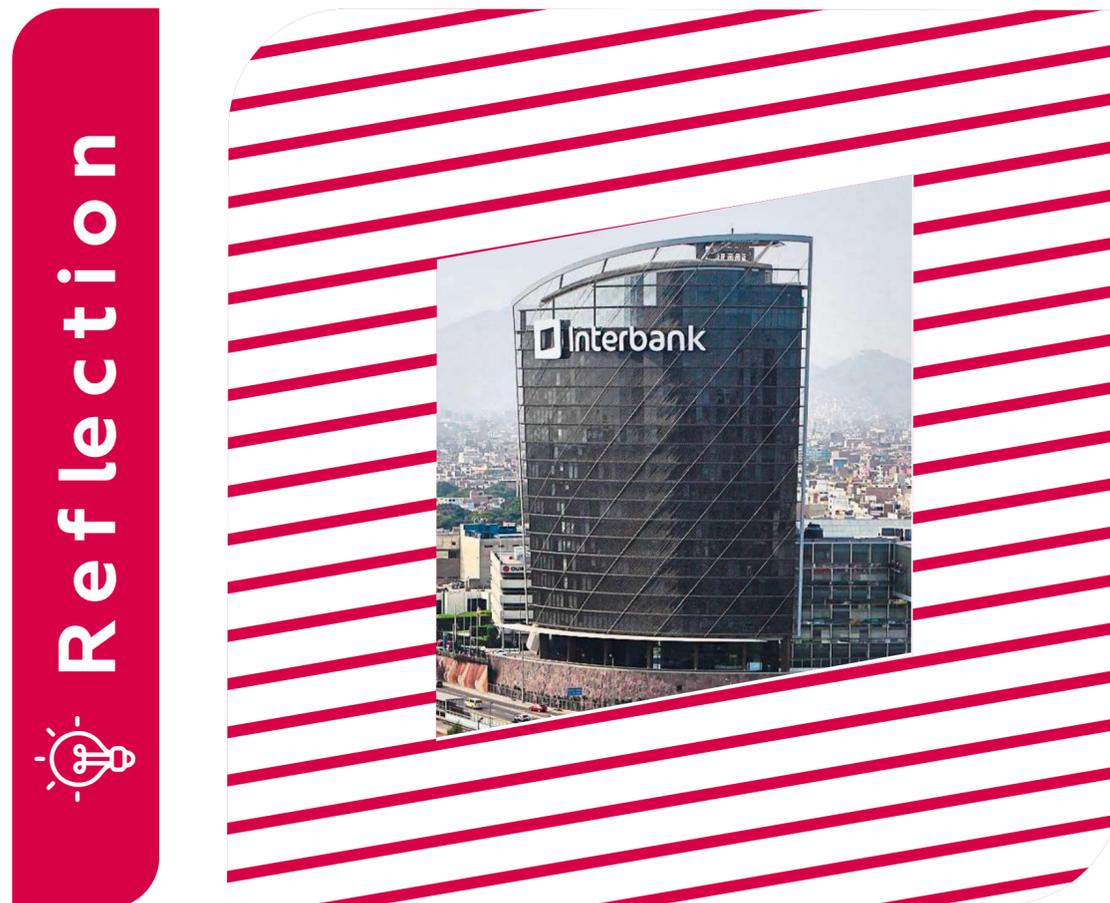
How do we live our commitment?

- By running our business within the framework of free market competition and respecting our competitors and stakeholders.

What is prohibited?

- Taking advantage of a dominant market position to improperly gain a competitive advantage.
- Making agreements with other companies to manipulate marketing conditions, prices or bidding processes.
- Accepting information from a competitor or its clients, if there is a presumption that it has not been obtained in a lawful manner.
- Misusing the reputation, image or intellectual property of other companies, as well as damaging the image of our competitors.





Barbara is negotiating a mortgage loan rate with a client who is analyzing offers from Interbank and another bank. To convince the client, Barbara argues that the other bank usually "offers low rates at the beginning of the contract, then raises them arbitrarily and also charges hidden fees", information that is not true.

Tony, Barbara's colleague, overhears the conversation and tells Barbara that her behavior is unethical, the information is false and damages the reputation of the other bank.



10.9. Commitment to Compliance with Regulations

We design our products and services in compliance with Interbank's internal and external regulations.

How do we live up to our commitment?

- By complying with the laws and regulations applicable to Interbank. If Interbank operates in other countries and local laws differ from the standards set forth in our Code, we must comply with local regulations, unless they are less stringent, in which case this Code will prevail.
- Complying with all internal policies, guidelines and manuals that Interbank has defined for the exercise of our functions.
- Reporting acts of non-compliance with external and internal regulations that apply to the Bank.
- Reporting operations that could generate suspicion of any illicit activity, such as money laundering and terrorism financing.



What is prohibited?

- Suggesting or advising a client, employee, supplier or third party to infringe local laws and/or Interbank's internal regulations.
- Failing to comply with internal requirements, rules and regulations issued by supervisors, regulators, or any other relevant entity.
- Performing illegal activities, as well as, disclosing any related internal investigation linked to a client, employee, supplier or interested parties with these activities.

Reflection



John serves a 19-year-old client who recently opened a savings account and has been coming to the bank every day to make cash deposits accumulating \$130,000. This week he continues to receive deposits and has started making transfers abroad. The client is uncomfortable and nervous when Joe asks him about the source of the funds and refuses to provide details of his economic activity.

What should John do?

John should report these transactions to the Ethics and Compliance Division to initiate a review of the client to determine if his transactional behavior is commensurate with his profile, or if he could be using the bank as a vehicle to commit money laundering.

Learn more here:

- Compliance Manual
- Anti-Money Laundering and Countering-Terrorism Financing Manual



10.10. Commitment to Anti-Corruption

Corruption is the misuse of public or private power to obtain an undue personal benefit, infringing principles, ethical duties and regulations.

We are committed to maintaining ethic relationships with private and public officials, always in an honest and transparent manner.

How do we live our commitment?

- Acting responsibly and not tolerating any form of business, transaction or agreement that involves any act of corruption or bribery.
- Complying with the guidelines and processes established in our anti-corruption policy to prevent any act of bribery and corruption, both public and private.
- Complying with the precise guidelines for the relationship of our employees and representatives with government officials.



What is prohibited?

- Offering, delivering, requesting or demanding from any individual or legal entity, national or foreign, client, employee, public or private official, a bribe or illegal gratuity to perform an act inherent to one's duties, in order to obtain or grant an undue personal advantage or for a third party.
- Making invitations and/or representation expenses other than those stipulated in our expense policy.
- Receiving, requesting or delivering donations and/or gifts to clients or suppliers without following the process set out in our guidelines.
- Meeting with public officials on behalf of Interbank, when this has not been approved by the appropriate Vice President or the CEO or to obtain a personal benefit.



The bank needs to renew an operating license for one of the branches and entrusts David with its management. Robert, a municipal employee, informs David that the process takes 30 days, but if he deposits \$200 in his personal account, he can speed up the process to 4 days.

What should David do?

Reject Robert's request and report it to his immediate supervisor. At Interbank we do not offer or receive any type of bribe under any circumstances.

Learn more here:

- [Anti-Corruption Policy](#)



10.11. Commitment to the Community and the Environment

We are aware that our activity contributes to the well-being of the community in general; therefore, we promote financial inclusion, seek to encourage the responsible use of credit, encourage savings, and are committed to generating environmental awareness and minimizing any negative impact on the environment.

How do we live our commitment?

- Generating accessible initiatives to offer our products and services providing greater coverage, security, simplicity and lower costs.
- Seeking that our participation in the different geographic regions of the country generates added value and development in the communities, working actively with stakeholders.
- Caring for the environment: recycling the materials we use in our operations, promoting the efficient use of resources and materials and reducing emissions.

Reflection:

Did you know that...leaving our computers on all night at home or in the office unnecessarily consumes 40% more energy?

Turning off our equipment at night saves energy for the planet and also benefits our household economy.





The provisions of this Code, together with the good judgment and common sense that should guide us at all times, will be useful for the performance of our work and will also help you to make the best decisions in your personal, family and social environment.

Remember that our behavior inside and outside the Bank represents Interbank's principles and values, and impacts our reputation.



If you have any questions about the content of our **Code of Ethics**, you can write to the mailbox

 dcumplimiento@intercorp.com.pe