



Code of ethics



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1. Message from Carlos Tori



Integrity and ethics are essential values in our culture and define the way we do business. We are firmly committed to these principles in all interactions with our stakeholders, including employees, clients, suppliers, the government, shareholders and society.

This document serves as a representation of that commitment. Only by conducting ourselves with integrity can we move -closer to fulfilling our vision: "To be the Best Bank through the Best People". By acting correctly, each of us contributes to build the Peru we dream of.

Therefore, I encourage you to uphold the highest standards of integrity and professional conduct. Through a firm commitment to ethics, we build a strong and sustainable bank, setting an example for everyone.

Carlos Tori
#siempreconetica



2. Purpose

Our Code of Ethics is designed to encourage and promote principles and behaviors expected from our employees and stakeholders, seeking to prevent and address any misconduct.

3. Who is this code for?

This Code applies to the board of directors and employees of Interbank. Likewise, we expect our suppliers and third parties to act in alignment with its principles and values.



4. What does ethical management mean?

Acting with ethics means choosing to do the right thing by adhering to our principles and values. Ethical management also involves taking an active role in promoting ethical behavior, as well as identifying and reporting actions against the principles of this Code.

While most decisions between right and wrong are straightforward, there may be situations where making an ethical choice is more challenging. In such cases, we encourage you to reflect by asking 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 were the other person?
- 4 What would the possible consequences of my actions be?
- 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 our 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, which is the same as if you had participated in carrying it out.



Reflection:

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.

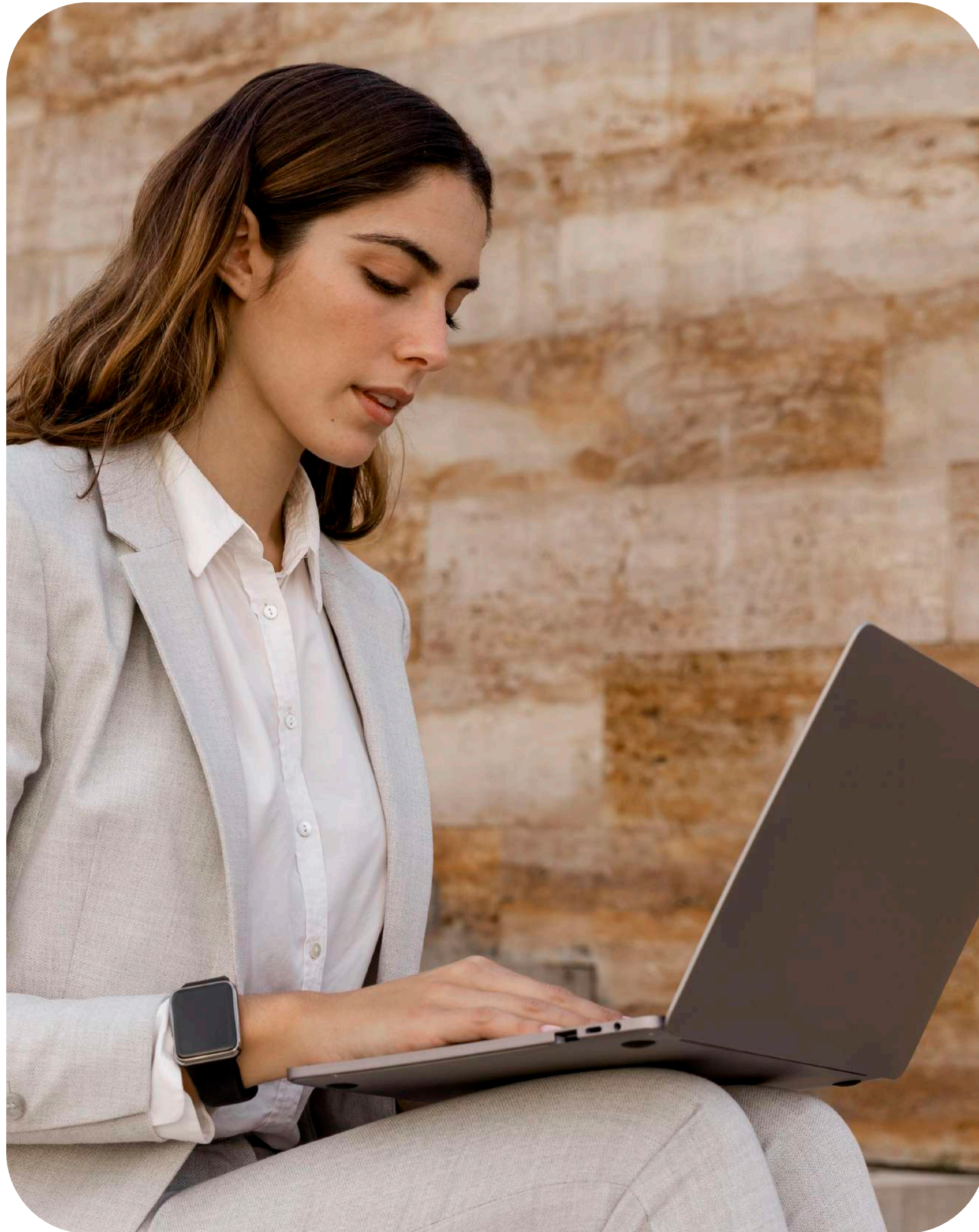


6. Interbank's ethical principles

We manage our business through the following ethical principles:

- 1 Being HONEST, always acting with integrity.
- 2 COMPLYING with the rules and commitments we make to others.
- 3 Being TRANSPARENT when handling information.
- 4 RESPECTING differences and diversity, promoting fair and respectful treatment toward others.
- 5 ACTING responsibly and diligently to successfully address day-to-day situations.
- 6 Doing the RIGHT THING in a fair manner, always putting ourselves in the position of "the other" at all times and in all places.
- 7 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. We do not retaliate against those who report conduct that infringes this Code, even if it is later found to be only apparent.

Reports are 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

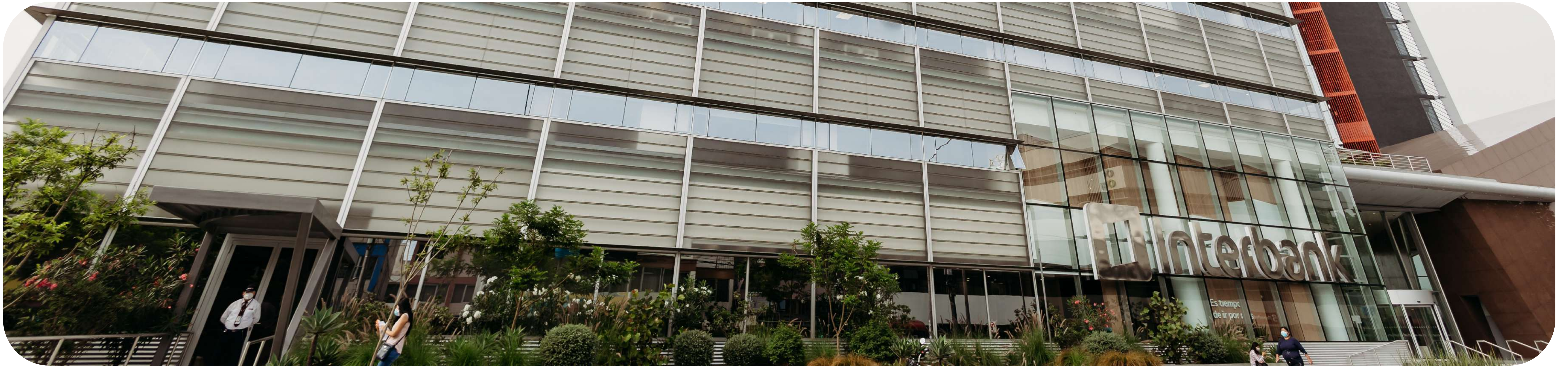
We have established an Ethics Committee responsible for overseeing the management of this Code and it is comprised by:

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

Its main functions include:

- Overseeing compliance with this Code, ethics policies and guidelines
- Reviewing and monitoring the initiatives and workplans submitted to the Committee
- Deciding on corrective actions, when applicable





9. Responsibility and disciplinary measures

Ethical principles must be always complied, 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 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 accordance with international standards.
- Working as a team, valuing everyone's different opinions and contributions.
- 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.
- Selecting professionals based on their talent, training, competencies and experience.
- Providing salaries and benefits similar to those received by employees with the same level of responsibility, while remaining competitive with the relevant job market, in accordance with the obligations and responsibilities assigned to them.
- 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 towards intimidating, hurting, frightening, threatening or intentionally excluding any person or a particular group.
- Impose and/or allow any form of forced or compulsory labor, as well as child labor.
- Any form of hostile or offensive treatment of a person in the work environment by any means.
- Make sexual advances, sexually offensive acts and comments, sexist, indecent or obscene conversations, gestures and comments, both within and outside the organization.
- 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.





Reflection

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 and 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 via the Whistleblower Hotline (anonymously, if you prefer) 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?

- We promote a safety culture based on prevention, maintaining a safe and healthy work environment for our employees, directors and visitors, complying every time with the safety provisions established by the external and internal regulation applicable to Interbank.
- We take action and/or report identified risks or accidents in a timely manner, to apply necessary measures.
- We immediately report 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.





Reflection

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 healthcare facility later to check the bruise because she now has to close a transaction.

What should Gabriela do?

Gabriela should stop what she is doing and go to the nearest healthcare 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.
- Communicating and maintaining data, agreements, transactions, operations and business, financial and non-financial reports in a transparent, accurate, timely, clear and complete manner.
- Recording financial information in compliance with rules, accounting practices and standards applicable to Interbank.
- Reporting any known manipulation or concealment of financial information and operational reports.

What is prohibited?

- Falsifying or manipulating Interbank's financial reports.
- Deliberately providing or recording false or inaccurate data.



Did you know that...:

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

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





10.4. Commitment to Honesty

We are confident that we will achieve our vision, mission and purpose 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 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?

- Concealing information, carrying out fraud, falsifying/adulterating documents, providing false information, generating or taking advantage of errors or omissions in procedures, systems 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 people, 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, third parties or for purposes unrelated to your work.
- Inciting others to perform dishonest or fraudulent acts.
- Using ambiguous, misleading terms or explanations, as well as hiding relevant information when making decisions.





Reflection

Mary has just joined a new branch. To receive additional bonuses, a colleague suggests that she tells clients that they “can only open an account if they purchase debit card insurance”. Mary knows that this information is false.

What should Mary do?

After thinking it over, she decides to report this misconduct via the Whistleblower Hotline. Thanks to this report, it was possible to identify two employees that engaged in this misconduct 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 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 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.



Richard is a frequent bank client and is always accompanied by his son when making 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



Reflection





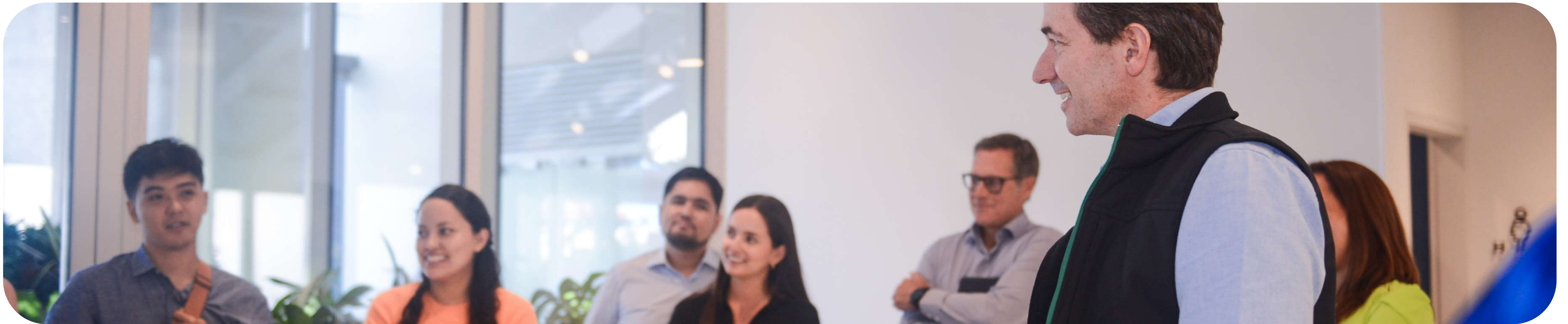
10.6. Commitment to Represent Interbank Responsibly

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

How do we live our commitment?

- Showcasing Interbank's values and principles at all times, behaving appropriately in work, social and family environments.
- Making responsible use of personal and corporate social networks.
- Respecting the right of our employees to participate in personal activities of different religious, educational, political and other organizations, where they must always act in a respectful and responsible manner.
- Reporting any action that threatens Interbank's reputation.





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.





Reflection

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

A conflict of interest arises when your personal activities or relationships are incompatible or collide with the performance of your duties as an employee and/or the interests of 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.
- Declaring, consulting and seeking approval from the corresponding authorities in case we identify any situation that may affect or appear to affect our ability to make the best decisions for Interbank's benefit.
- Properly managing our personal finances, avoiding being over-indebted and being up to date on 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.
- Rejecting gifts and hospitality from clients, suppliers and/or third parties to prevent them from influencing objective decision-making and complying with the policy that regulates exceptions for the delivery and receipt of gifts and hospitality.
- Reporting any irregular behavior that goes against the interests and reputation of Interbank. For this we implement guidelines for the attention and hiring of family and friends.



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 all guidelines.
- Conducting business or meetings with other employees, clients or other stakeholders, when this may affect the work environment and 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 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.



Reflection

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

What should Maria do in this situation?

Maria should refrain from participating in the process and report the case to her direct boss, her manager and the Ethics and 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:

Example:

Subject: Conflict of Interest

Addressed to:

Dcumplimiento@intercorp.com.pe

CC: [boss]; [manager]

I hereby notify you that I am in the following conflict of interest situation: [...]

[Employee's full name]

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 product and service improvement, and boosting 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 when 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 Law and 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 operations that could generate suspicion of any illicit activity, such as money laundering and terrorism financing.
- Reporting acts of non-compliance with external and internal regulations that apply to the Bank.





What is prohibited?

- Suggesting or advising a client, employee, supplier or third party to infringe local laws and/or Interbank's internal regulations.
- Deliberately or negligently failing to comply with internal policies and guidelines, requirements, standards and internal 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 related to 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 ethical 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, without seeking undue profit or advantages.
- Developing our operations with integrity, impartiality and without obtaining undue advantages.
- Not making donations or contributions to candidates or political parties with resources or on behalf of Interbank or any company in the Intercorp group.
- Immediately reporting any conduct that goes against our anti-corruption commitment or gives the appearance of an act of bribery.





What is prohibited?

- 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.
- Offer, deliver, request or accept any type of reward, benefit or incentive, as well as any contribution, donation or sponsorship on behalf of Interbank or its subsidiaries, so that a public or private official acts improperly or grants an undue advantage.



The bank needs to renew an operating license for one of the branches and entrusts Diego with its management. Ulises, a municipal employee, informs Diego 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 Diego do?

Reject Ulises'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



Reflection



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.
- Caring for the environment: recycling the materials we use in our operations, promoting the efficient use of resources and materials and reducing emissions.
- Measuring and monitoring our carbon footprint with the aim of reducing our impact.
- Promoting the responsible use of resources (energy, water and waste).
- Seeking that our participation generates added value and communities' development, actively working with stakeholders.
- We evaluate environmental, social and governance (ESG) factors in the projects we finance or invest in, encouraging our clients and stakeholders to move towards socially and environmentally responsible business practices.

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 benefits our household economy.





The provisions of this Code, together with the good judgment and common sense that should always guide us, will be useful for our work performance and will also help us make the best decisions in our personal, family and social environment. Remember that our behavior inside and outside the Bank represents Interbank's principles and values and impacts our reputation.



