

CORPORATE ETHICS AND COMPLIANCE POLICY

I. Introduction

At Intercorp Financial Services (“IFS”) we act with integrity, committed to work with the highest ethical and compliance standards, in alignment with our mission and vision.

We are focused on applying the best international practices and complying with regulatory obligations in the jurisdictions in which we operate. This enables us to strengthen our relationships with our stakeholders and protect our reputation.

In this regard, this Policy is intended to outline the scope of the IFS Corporate Ethics and Compliance Program (“Program”).

II. Regulatory Framework

The Program has been developed on the basis of the rules established by compliance regulatory bodies such as the United States Securities and Exchange Commission (SEC), the United States Department of Justice (DOJ), the SBS – Superintendencia de Banca, Seguros y AFP (Superintendency of Banking, Insurance and Pension Fund Administrators), the SMV - Superintendencia de Mercado y Valores (Superintendency of Markets and Securities), the SBP la Superintendencia de Bancos de Panamá (Superintendency of Banks of Panama) and the Central Bank of the Bahamas, among others.

In addition, we have adopted the recommendations of the Financial Action Task Force (FATF).

III. Code of Ethics

Our Code of Ethics, as the cornerstone of our Program, establishes and promotes the expected behaviors from our directors, employees, suppliers, and other stakeholders, contains the values and principles that guide our day-to-day decisions and actions, and reflects our commitment to integrity.

IV. Our Program

The purpose of our Program is to ensure compliance with ethical and regulatory standards, adopting a risk-based approach, in line with the industry, size and complexity in the different jurisdictions where we operate.

The Program, which applies to IFS and its subsidiaries, includes the following prevention, detection, and response mechanisms:

1. Anti-Money Laundering and Counter Terrorism Financing (AML/CTF)

The purpose of this program is to manage the risk of being used directly or through third parties as an instrument for money laundering and/or terrorist financing and is structured as follows:

- i) Policy and procedures.
- ii) Customer risk assessment methodology.
- iii) Know-your-customer procedures up to the ultimate beneficiary owner.
- iv) Monitoring procedures for customers and quality assurance of controls.
- v) Knowledge and monitoring procedures for directors, employees, suppliers and counterparties.
- vi) Periodic training and communication.
- vii) Whistleblowing channels.
- viii) Suspicious Transaction Reporting to the competent authorities.

- ix) Independent audits.
- x) Action, remediation, and continuous improvement plans.

2. Anticorruption and Crime Prevention

The purpose of this program is to manage the risk of engaging in acts of corruption, as well as to safeguard our reputation. In this regard, we have defined a zero-tolerance policy for acts of corruption.

The program is structured as follows:

- i) Policy and procedures.
- ii) Gift and hospitality, interaction with public officials, donations and contributions to political campaigns guidelines.
- iii) Corruption risk assessment methodology.
- iv) Knowledge procedures for directors, employees, customers and third parties.
- v) Monitoring procedures and quality assurance of controls.
- vi) Periodic training and communication.
- vii) Whistleblowing channels.
- viii) Independent audits.
- ix) Action, remediation, and continuous improvement plans.

Political contributions and/or political contributions by officers and employees on behalf of IFS and its subsidiaries are prohibited.

3. Regulatory Compliance

This program aims to ensure compliance with applicable internal and external IFS and subsidiary standards and to mitigate the risk of non-compliance penalties, as well as to safeguard our reputation.

The program is structured as follows:

- i) Policy and procedures.
- ii) Regulatory compliance risk assessment methodology.
- iii) Identification, awareness, and follow-up procedures for applicable regulations.
- iv) Compliance monitoring and evaluation.
- v) Periodic training and communication.
- vi) Whistleblowing channels.
- vii) Independent audits.
- viii) Action, remediation, and continuous improvement plans.

This program also ensures compliance with: (i) the Antitrust policy, which establishes measures for conducting business respecting our competitors and stakeholders, and (ii) the Personal Data Protection policy, through which we establish measures for the treatment of personal data obtained from our customers, employees, and other stakeholders within the framework of our operations, in accordance with applicable regulations and international best practices.

4. Conflict of Interest and Insider Trading:

Our aim is to prevent and manage conflicts of interest that may arise as a result of the activities of IFS and its subsidiaries, in this regard:

- i) We have policies and guidelines on conflicts of interest and insider information.
- ii) Our employee and supplier hiring processes are carried out under objective criteria and based on meritocracy.

- iii) We conduct the giving and receiving of gifts and/or hospitality in a manner that ensures objective decision making.
- iv) We promote the protection of our investors by regulating the trading of securities of IFS and its subsidiaries by people with access to insider information.
- v) We use inside information only for the exercise of our corporate functions.

5. Tax Transparency

We are committed to complying with applicable tax regulations of each jurisdiction in which we operate, in this regard:

- i) We disclose, report and present tax information in a complete, accurate, timely manner and in accordance with the law.
- ii) We present and register our financial statements in accordance with local and international standards, as applicable.
- iii) We engage with suppliers that comply with tax regulations and are fiscally compliant.

6. Human Rights

We respect and promote human rights in accordance with international standards. Our policies embody international agreements and principles, such as the United Nations Global Compact, the International Bill of Human Rights, and the International Labor Organization (ILO) Declaration and are applicable to the directors and employees of IFS and its subsidiaries. In addition, supplier, customer, and other stakeholder practices must be consistent with these policies.

IFS and its subsidiaries are committed to respect and promote human rights in accordance with applicable laws in the jurisdictions in which they operate.

7. Whistleblowing channel

Our directors, employees, customers and third parties have at their disposal a channel that allows them to anonymously report non-compliance or suspected non-compliance with the Code of Ethics and/or our internal policies, as well as any behavior that goes against the values we promote. To safeguard the integrity of whistleblowers, we have a "Zero Retaliation" policy, and the channel is managed by a third party.