

CODE OF ETHICS



Our Commitment to Integrity

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1. PREAMBLE

At Intercorp Financial Services Inc. (IFS), we believe in a Peru where endless possibilities abound, with equality of opportunity and access to health, education and modernity for all. We seek to empower Peruvians to achieve their financial well-being by providing transparent and efficient solutions for the thousands of people and companies that trust us and contribute to building a better society.

We firmly believe that the only way to achieve this purpose is by making the right decisions with integrity. We thus expect all employees and stakeholders to act ethically at all times, regardless of their position, geographic location or level of responsibility.

The IFS Code of Ethics represents who we are and what we expect of ourselves and our stakeholders. It reflects our values and guides us toward our goals, strengthening our individual and corporate reputation on a sustained basis.

Thank you for joining us in our commitment to doing things right, we are confident that we will achieve our goal together!

Luis Felipe Castellanos

2. PURPOSE

The IFS Code of Ethics represents our beliefs, values and principles, setting out guidelines and standards of conduct aimed at guiding the decision-making and actions of our employees, directors, clients, suppliers, business partners, and stakeholders.

This document provides general guidelines on how to perform daily activities, as well as prevent, avoid and correct behaviors to align them with the culture, values and principles of IFS and its subsidiaries.

3. WHO IS THIS CODE FOR?

This Code of Ethics applies to IFS and all subsidiaries, including their:

- Directors and employees
- Suppliers
- Clients
- Other stakeholders

4. MAKING THE BEST DECISIONS

We all know that integrity must be a fundamental part of all our daily decisions and behaviors. However, some situations may arise in the performance of our duties for which there may be more than one solution. In such cases, we strongly recommend that you consider the following questions:

- Is the conduct legal, and correct?
- Is the behavior consistent with the Code of Ethics?
- Am I proud of my decision?
- Does my action contribute to building a company with a strong ethical culture?

If you answered "NO" or "I DON'T KNOW" to any of the above questions, you should seek assistance or consult with your manager, immediate supervisor or your subsidiary's Ethics and Compliance Officer to make a better decision.

We must all take a leading role in identifying and reporting misconduct. If we deliberately avoid seeing, hearing or reporting misconduct, we engage in "*willful blindness*". This makes us complicit in such behavior.

5. REPORTING CHANNELS AND WHISTLEBLOWER PROTECTION

Any wrongdoing, improper conduct or inconsistent action with this Code of Ethics must be reported through the available whistleblower hotline. All employees, directors, suppliers, clients, and stakeholders can lodge complaints anonymously.

To ensure confidentiality, we implemented a special team for investigation and ethics committee to safeguard independence and resolve cases reported.

If you become aware of any inappropriate conduct, any non-compliance or suspicious activity, you may file a report through our whistleblower hotline: <https://www.ifs.com.pe/whistleblower-channel/>.

You may also report to:

- Your manager or immediate supervisor
- Your subsidiary's Ethics and Compliance Officer
- IFS Chief Compliance Officer

At IFS and all subsidiaries, we have appropriate mechanisms in place to prevent retaliation against whistleblowers.

Each IFS subsidiary shall implement whistleblower hotline and develop its own Code of Ethics based on these guidelines, which shall not be less stringent than these.

6. LIABILITY AND PENALTIES

Failure to comply with the provisions set forth in this Code of Ethics will result in penalties from disciplinary measures to dismissal or termination of contract.

7. OUR COMMITMENT

7.1. Commitment to our Shareholders and Investors

7.1.1. Integrity of financial and non-financial reports

- We ensure the timely, complete, correct, and accurate recording of transactions and operations in order to report appropriate information for decision-making.
- We keep accurate, timely, clear, and complete commercial, financial and non-financial data, records, agreements, transactions, operations, and reports.
- We record financial information in compliance with the accounting rules, practices, and standards applicable to IFS and its subsidiaries.
- We disclose full, fair, timely, and clear information in our public communications,

regulatory disclosures and reports submitted to shareholders, investors, and regulatory bodies.

At IFS and all subsidiaries, it is forbidden to:

- Falsify or manipulate in any way financial and non-financial reports.
- Voluntarily provide or record false or erroneous accounting or auditing data.
- Allow or fail to report any conduct that undermines the integrity and transparency of information.

7.1.2. Protection of Proprietary Information and Intellectual Property

- We protect the confidential information of our subsidiaries, directors, employees, clients, suppliers, and stakeholders.
- We use privileged information responsibly, only for corporate purposes, and prevent it from being used for other purposes.
- We protect our intellectual property and our information systems, encouraging the proper use of the information we reproduce or distribute by any physical or electronic means.
- We reserve the right to monitor and inspect how employees use our assets, which may include e-mails, data and files kept on IFS and subsidiaries' equipment or network, in accordance with applicable laws.

At IFS and all subsidiaries, it is forbidden to:

- Improperly use, appropriate, disclose confidential, proprietary, or privileged information without authorization, including personal data of clients, directors, and employees, as well as information protected by specific laws and regulations applicable in the financial sector, stock market or internal policies.
- Disclose business strategies, campaign information, market strategies, strategic plans, and any other data that may jeopardize the competitiveness of IFS and its subsidiaries.
- Misuse access, user IDs or passwords that have been given to you personally for the performance of your duties.
- Deliberately, negligently, or carelessly fail to comply with information security guidelines, personal data protection and insider trading policies issued by IFS or its subsidiaries.
- Conceal or fail to report any misuse or violation of proprietary information and intellectual property.

7.1.3. Prevention of Internal and External Fraud

- We reject any form of fraud by acting with integrity and avoid concealing, altering, or omitting information for our own benefit or for the benefit of third parties.
- We take care of IFS and subsidiary resources by using them responsibly and honestly to do our work. We do not waste or abuse them or use them for personal gain.

At IFS and all subsidiaries, it is forbidden to:

- Perform any act involving the use of deception to obtain an unfair or illegal advantage or personal benefit.
- Steal or take money or assets from IFS, its subsidiaries, clients, directors, employees, suppliers or third parties.
- Improperly or negligently use the resources or assets assigned to our work.
- Induce third parties or participate in dishonest or fraudulent acts.
- Conceal or fail to disclose fraud or any other dishonest conduct we may become aware of.

7.1.4. Conflict of Interest

- We avoid situations where our personal relationships or interests may influence the performance of our work duties or decisions.
- We consult and seek approval from the appropriate bodies in the event we identify any situation that may affect or have the appearance of affecting our ability to make the best decisions in the best interests of IFS and its subsidiaries.
- We reject conduct in which gifts, courtesies, and hospitality influence objective decision-making. Each subsidiary shall implement a gift, courtesies, and hospitality policy.
- We report any inappropriate behavior of conflict of interest that threatens the interests and reputation of IFS and its subsidiaries through the implementation of guidelines for the service, recruitment or selection of relatives and friends, including procedures for the timely reporting of these situations to the appropriate bodies.

At IFS and all subsidiaries, it is forbidden to:

- Conduct personal business inside and outside the company's premises that may hinder the performance of duties or objective decision-making.
- Handle transactions or intervene in hiring or selection processes involving relatives or friends.
- Maintain sentimental relationships with employees, directors or suppliers, with whom there is a direct relationship of control, subordination or reporting, as well as in other cases where this may hinder objective decision-making.

- Have a "Deficient", "Doubtful" or "Loss" rating in credit bureaus.
- Have or become aware of any conflict of interest and fail to report it.
- Be a shareholder, director or representative of any supplier of IFS or its subsidiaries, without having the appropriate authorization when your duties are related to the service provided by such supplier.

7.1.5. Responsible Representation of the Company and Protection of Reputation

- We represent our organization in a responsible manner, including in non-work environments, such as family and social environments, acting and making the best decisions for our companies and stakeholders, within the framework of upright and lawful behavior.
- We protect and strengthen the image, reputation, assets and culture of integrity of IFS and its subsidiaries and seek to ensure that stakeholders comply with our ethical standards.
- We conduct off-site activities in a responsible manner, always taking care of the reputation of our companies, including the responsible use of our personal social networks.

At IFS and all subsidiaries, it is forbidden to:

- Partake in behavior or statements spread through physical or digital mass media on social networks that may harm the image of IFS or its subsidiaries, even if made in a personal, social, or family sphere.
- Compromise the image of IFS or its subsidiaries in personal activities of a political, sports or social nature.
- Conceal or fail to report conduct that may affect our reputation.

7.2. *Commitment to our Directors and Employees*

7.2.1. Diversity, Equal Opportunity, and Respect

- We value and promote cultural plurality, diversity, and gender equity, maintaining an inclusive environment, free of harassment.
- We encourage transparent communication between IFS members and subsidiaries.
- We respect the work environment and our directors and employees and build relationships of trust by maintaining an inclusive environment, with respectful, fair, dignified, and courteous relationships among all.

At IFS and all subsidiaries, it is forbidden to:

- Engage in aggressive verbal or physical behavior intended to intimidate, hurt, frighten, threaten, or intentionally exclude a particular person or stakeholder.
- Engage in hostile or offensive treatment of a person in the workplace, by any means.
- Make sexual advances, sexually offensive acts and comments, sexist, indecent or obscene comments and conversations, and gestures.
- Discriminate based on race, ancestry, gender, age, religion, nationality, academic level, political affiliation, physical disability, marital status, sexual orientation, or any other characteristic.
- Allow or fail to report any conduct that threatens people's integrity.

7.2.2. Safe and Healthy Environment

- We promote a safety culture based on prevention, maintaining a safe and healthy work environment for our employees, directors, and visitors, complying at all times with the safety provisions established by IFS and its subsidiaries.
- We take action and promptly report risks or accidents in order to apply the necessary measures in a timely manner.
- We perform our duties in an alcohol and drug-free environment.

At IFS and all subsidiaries, it is forbidden to:

- Deliberately, negligently or carelessly fail to comply with the safety and health guidelines issued by IFS or its subsidiaries.
- Engage in any behavior that jeopardizes the safety and health of employees, directors and third parties on our premises.
- Work in or enter IFS or subsidiary facilities under the influence of toxic substances or consume alcoholic beverages or drugs during working hours.
- Allow or fail to report conduct that undermines the safe and healthy environment at IFS and its subsidiaries.

7.3. Commitment to Authorities

7.3.1. Compliance with Laws and Regulations

- We comply with national and international regulations issued in the jurisdictions applicable to IFS and its subsidiaries.
- We ensure compliance with IFS and subsidiary internal policies and guidelines to conduct our business with integrity.
- We implement robust processes and provide ongoing training to prevent any activities related to money laundering and financing of terrorism.

At IFS and all subsidiaries, it is forbidden to:

- Deliberately, negligently or carelessly fail to comply with compliance policies and guidelines, as well as any non-compliance with national and international regulations applicable to IFS and its subsidiaries.
- Fail to immediately report any finding or incident involving behavior that goes against the integrity and compliance guidelines of IFS or its subsidiaries.

7.3.2. Prevention of Corruption

- We act in a responsible manner, complying with anti-corruption laws and IFS and subsidiary policies and guidelines aimed at preventing any act of corruption of public and private officials.
- We implement processes and provide ongoing training to prevent acts of corruption.

At IFS and all subsidiaries, it is forbidden to:

- Offer, promise, give, solicit or accept any kind of reward, benefit or inducement (gift, courtesy or anything of value), as well as any personal contribution, donation or sponsorship from IFS or its subsidiaries, in order to make a public or private official act in breach of his/her duties, or to improperly influence a business decision.
- Negotiate with individuals of private or public entities for undue personal advantage or for the advantage of IFS or its subsidiaries.
- Deliberately, negligently or carelessly fail to comply with anti-corruption policies and guidelines issued by IFS or its subsidiaries.
- Fail to report any indication of corruption.

7.3.3. Relationships with Public Officials

- We engage in transparent and ethical relationships with public authorities and officials. Any meeting on behalf of IFS or its subsidiaries must be held with prior authorization from the appropriate bodies.
- We respond to regulatory entities and their agents in an honest and transparent manner, complying with the commitments assumed, providing accurate, appropriate and timely information for proper supervision.
- We conduct our business activities with integrity, impartiality and without any political influence.
- We do not make political donations or contributions to candidates or parties with IFS or subsidiary resources. If an employee makes political donations or contributions, they must not be made using the name of IFS or its subsidiaries.

At IFS and all subsidiaries, it is forbidden to:

- Make an offer to a representative of the public sector with the aim of obtaining favorable treatment.
- Offer or make on behalf of IFS or its subsidiaries, donations or political contributions to positions or actions taken by candidates, parties or political organizations.
- Allow or fail to report any misconduct with public officials.

7.4. *Commitment to our Competitors, Clients, Suppliers and Business Partners*

7.4.1. Relationships with our Competitors

- We conduct our business based on free and fair competition, promoting innovation, continuously improving our products and services, and generating benefits for the market.
- We respect our competitors, without referring to them or their brands in a negative or derogatory manner.
- We develop our business policies, pricing and commercial aspects independently from competitors.
- We compete fairly and honestly, based on our ethical principles and in full compliance with the legal rules and regulations governing the markets.
- We do not perform any act intended to hinder, restrict or distort competition.

At IFS and all subsidiaries, it is forbidden to:

- Take undue advantage of a leading market position or make agreements with other companies to manipulate marketing conditions, prices or bidding processes.
- Boycott our competitors by any means, or misuse the reputation, image or intellectual property of other companies.
- Engage in, allow or fail to report any anti-competitive behavior.

7.4.2. Relationships with our Clients

- We enter into fair and honest agreements with our clients, providing them with accurate and transparent information about the services and products we offer so that they can make informed decisions.
- We honor commitments and are transparent in our client relationships.
- We treat our clients with respect and dignity.
- We are committed to maintaining the trust and loyalty of our clients.

At IFS and all subsidiaries, it is forbidden to:

- Resort to ambiguous or misleading terms or explanations, as well as withholding information relevant for clients to make informed decisions.
- Engage in, allow or fail to report any misconduct that undermines the interests of our clients.

7.4.3. Relationships with our Suppliers, Business Partners and Third Parties

- We value our suppliers, business partners and third parties as strategic business allies and recognize their importance in achieving our objectives. We thus expect them to conduct their business ethically.
- We are transparent and fair in our supplier negotiation and selection processes, taking into account their track record, quality of service, reputation, and other merits.

At IFS and all subsidiaries, it is forbidden to:

- Unduly favor a supplier in a selection or award process.
- Solicit or receive gifts, courtesies or bribes from any supplier.
- Engage in, allow or fail to report any misconduct that reflects a lack of integrity in relationships with our suppliers, business partners and third parties.