

# CODE OF ETHICS



## **Our Commitment to Integrity**

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## **1. PREAMBLE**

At Intercorp Financial Services Inc. (IFS), we believe in a Peru with transparent and efficient financial solutions for everybody, contributing to the building of a better society, in order to help thousands of individuals and companies that trust us to achieve their financial well-being.

We strongly believe that the only way to achieve this purpose is by making the right decisions with integrity, and in that sense expect all employees and Stakeholders to always act ethically, regardless of their position, geographic location, or level of responsibility.

This Code of Ethics represents IFS and its subsidiaries; reflects our values, and the way we achieve our purpose as well as reinforces our reputation.

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.

For this Code of Ethics, "Stakeholders" means those parties that have a relationship with, influence, or may influence the operation of IFS and/or its subsidiaries.

## **3. WHO IS THIS CODE FOR?**

The Code of Ethics aims at all directors, employees, suppliers, customers, and, in general, the Stakeholders of IFS and its subsidiaries.

## **4. WILLFUL BLINDNESS**

Integrity is fundamental in all our daily decisions and behaviors. Therefore, we must take a leading role in identifying and reporting misconduct. If we deliberately avoid seeing, hearing, or reporting misconduct, we engage in "willful blindness". This situation makes us as liable as the person taking part directly in the misconduct.

## **5. REPORTING CHANNELS AND WHISTLEBLOWER PROTECTION**

All employees, directors, suppliers, customers, and Stakeholders of IFS and its subsidiaries can anonymously report any irregular or inconsistent behavior with this Code of Ethics through our whistleblower channel:

- Web: <https://ifs.com.pe/whistleblower-hotline/>

To ensure the objectivity, integrity, and confidentiality of complaints and to avoid retaliation against whistleblowers, we have designed proper mechanisms to guarantee the independence of investigations and case management.

Each of IFS's subsidiaries has a whistleblower channel and a Code of Ethics, which may not contain less stringent guidelines than those set forth in this document.

## **6. LIABILITY AND PENALTIES**

Employees, directors, suppliers, customers, and Stakeholders of IFS and its subsidiaries shall comply with the ethical principles at all times, 24 hours a day, 7 days a week.

Therefore, failure to comply with the provisions set forth in this Code of Ethics will result in sanctions from disciplinary measures to dismissal or termination of the contract, as the case may be.

## **7. OUR COMMITMENT**

Each of us is responsible for ensuring and carrying out our activities with the highest standards of integrity, regardless of our position, geographic location, or level of responsibility where we work, therefore, IFS and its subsidiaries are committed to:

### **7.1 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 undermines the dignity and integrity of people.

To do so:

- We encourage honest communication among IFS members and their subsidiaries.
- We work as a team, respecting the different opinions and contributions of all.
- We respect the work environment, our directors, employees, suppliers, customers, clients, users, as well as other Stakeholders, and build relationships of trust by maintaining a safe and inclusive environment, with respectful, fair, and dignified relationships among all.
- We recognize and promote human and labor rights in line with international standards.

#### **In IFS and all subsidiaries is prohibited to:**

- Discriminate based on race, ancestry, gender, age, religion, nationality, academic level, political affiliation, physical disability, marital status, sexual orientation, or any other characteristic.
- Engage in aggressive and/or negative verbal or physical behavior intended to intimidate, hurt, frighten, threaten or intentionally exclude a person or a particular Stakeholder.
- Carry out hostile or offensive treatment of a person in the workplace, by any means.
- Impose and/or permit any form of forced or compulsory labor or child labor.
- Manifest sexual insinuations, sexually offensive acts and comments, sexist, inappropriate, or obscene conversations, gestures, and comments.

- Allow or fail to report any misconduct that violates the integrity of individuals.
- Be aware of and fail to immediately report any behavior that violates our commitment to diversity, equal opportunity, and respect.

## **7.2 Integrity of financial and non-financial reports**

We report our financial statements and operational information with transparency; therefore, records reflect our commercial, accounting, and financial situation accurately.

To do so:

- We ensure the timely, complete, correct, and accurate recording of transactions and operations to report adequate information for decision-making.
- We maintain accurate, timely, clear, and complete commercial, financial, and non-financial data, records, agreements, transactions, operations, and reports.
- We record financial information fully and transparently, complying with the rules, accounting 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 filed with shareholders, investors, and regulators.

### **In IFS and all subsidiaries is prohibited to:**

- Falsify or manipulate in any way, financial and non-financial reports.
- Voluntarily providing or recording false or erroneous accounting or auditing data.
- Allow, or fail to report, any conduct that undermines the integrity and transparency of the information.
- Become aware of and fail to report any manipulation or concealment of financial information and/or operational reports.

## **7.3 Protection of Proprietary Information and Intellectual Property**

We protect the confidential information of IFS, its subsidiaries, directors, officers, employees, customers, suppliers, and other Stakeholders.

To do so:

- We use insider information only for corporate purposes and prevent it from being used for other purposes.
- We protect our intellectual property and information systems by encouraging the proper use of information that 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-mail, data, and files maintained on IFS and its subsidiaries' equipment or network, in accordance with applicable laws.

**In IFS and all subsidiaries is prohibited to:**

- Use, appropriate, or improperly disclose confidential, restricted, or privileged information without authorization, including personal data of customers, directors, employees, and other Stakeholders, as well as information protected by specific laws and regulations applicable to the financial sector and/or securities market, and in accordance with the internal policies of IFS and its subsidiaries.
- Disclose business or market strategies, strategic plans, and any data that may jeopardize the competitiveness of IFS and its subsidiaries.
- Misuse access, and share keys or passwords that have been given to you personally for the performance of your duties.
- Deliberately, negligently, or carelessly violate 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.

#### **7.4 Conflict of interest**

A conflict of interest arises when personal activities or relationships are incompatible or collide with the objective exercise of our duties as an employee and/or the interests of IFS and its subsidiaries.

To do so:

- We avoid situations in which our personal relationships or interests may unduly influence the execution of our responsibilities, our business relationships with suppliers, customers, or other Stakeholders, or our work decisions.
- We select employees, suppliers, and other Stakeholders based on their knowledge, experience, merit, reputation, technical, and service quality.
- We consult and seek approval from the appropriate bodies if we identify any situation that may affect or have the appearance of affecting our ability to make the best decisions for the benefit of IFS and its subsidiaries.
- We prohibit giving gifts and hospitality when they are intended to influence objective decision-making. Each subsidiary has a gift and hospitality giving and acceptance policy.
- We refrain from making decisions related to IFS and/or its subsidiaries if we have a

family or friendship relationship with an employee, supplier, shareholder, customer, or another Stakeholder.

- We seek approval from our leaders before accepting a proposal to provide professional services to a public or private entity.
- We report any irregular behavior that may be damaging to the interests and reputation of IFS and its subsidiaries by implementing guidelines for the care, hiring, or selection of family members and friends.
- We maintain good credit and financial behavior.

**In IFS and all subsidiaries is prohibited to:**

- Conduct personal business inside and outside the company facilities that may hinder the performance of functions or objective decision-making.
- Intervene in hiring or selection processes involving family members or close people who influence objective decision-making.
- Maintain sentimental relationships with collaborators, directors or suppliers, and other Stakeholders with whom there is a direct relationship of control, subordination, or report, as well as in other cases in which this may hinder objective decision-making.
- To be aware of any conflict of interest and not report it.
- Be a shareholder, director, or representative of a supplier of IFS or its subsidiaries, when your functions are related to the service provided by that supplier.

## **7.5 Responsible Representation of the Company and Protection of Reputation**

We care for the reputation of IFS and its subsidiaries, respecting at all times its values and principles, and behaving correctly in the work, social and family environment.

To do so:

- We protect and strengthen the image, reputation, assets, and culture of the integrity of IFS and its subsidiaries and require Stakeholders to comply with our ethical standards.
- We responsibly conduct off-site activities, always taking care of our reputation, including the responsible use of our personal social networks.
- We respect the right of our employees to participate, on a personal basis, in the activities of different religious, educational, political, and other organizations.

**In IFS and all subsidiaries is prohibited to:**

- Behave or disseminate statements through physical or digital media, including social networks, that damage the image of IFS or its subsidiaries, even if it was done in a



- personal, social, or family circle.
- Compromise the image of IFS or its subsidiaries in personal activities of a political, religious, sporting, or social nature.
  - Conceal or fail to report conduct that may affect our reputation.
  - Become aware of and fail to report any action that jeopardizes the reputation of IFS or its subsidiaries.

## **7.6 Safe and Healthy Environment**

At IFS and its subsidiaries, we conduct business in a safe and healthy manner, taking care of our employees and other Stakeholders.

To do so:

- We promote a safety culture based on prevention, maintaining a safe and healthy work environment for our employees, managers, and visitors, and always complying with the safety provisions established by IFS and its subsidiaries.
- We act and/or promptly report risks or accidents in order to apply the necessary measures in a timely manner.

### **In IFS and all subsidiaries is prohibited to:**

- Engage in any behavior that jeopardizes the safety and health of employees, managers, and third parties who are in our facilities.
- Work under the influence of toxic substances or consume alcoholic beverages during the hours assigned for the performance of their work.
- Allow or not report behaviors that threaten the safe and healthy environment at IFS and its subsidiaries.
- Be aware of and fail to immediately report any behavior of employees or third parties that undermines the safe and healthy environment for all.

## **7.7 Compliance with Laws and Regulations**

We design all our products and services in compliance with external and internal standards applicable to IFS and its subsidiaries.

To do so:

- We comply with national and international regulations issued in the jurisdictions in which IFS and its subsidiaries operate.
- We ensure compliance with the internal policies and guidelines of IFS and its

subsidiaries.

- We implement robust processes and continuously train ourselves to prevent any activity related to corruption, money laundering, terrorist financing, and/or other illicit activities.

**In IFS and all subsidiaries is prohibited to:**

- Deliberately or negligently violate internal policies and guidelines, as well as any legislation applicable to the jurisdictions in which IFS and its subsidiaries operate.
- Suggest to a customer, collaborator, supplier, or other Stakeholder to violate the law and/or internal rules of IFS and its subsidiaries.
- Disclose any internal investigation related or linked to a customer, partner, supplier, or other Stakeholder with these activities.
- Be aware of and fail to immediately report any signal or incident involving non-compliance with regulations applicable to IFS and its subsidiaries.
- Be aware of and fail to report acts of non-compliance with external and internal regulations applicable to IFS and its subsidiaries.

## **7.8 Prevention of Corruption**

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

To do so:

- We ensure compliance with anti-corruption laws and the policies and guidelines of IFS and its subsidiaries aimed at preventing any act of corruption.
- We comply with the guidelines and processes established in our Anti-Corruption Policy to prevent any act of bribery and/or corruption.
- We monitor and implement the precise guidelines for the relationship of our employees and representatives with public officials.

**In IFS and all subsidiaries is prohibited to:**

- Offer, give, solicit, or accept any kind of reward, benefit, or inducement, as well as any contribution, donation or sponsorship on a personal basis, from IFS or its subsidiaries, for a public or private official to act improperly or to give an improper advantage.
- Deliberately or negligently fail to comply with the policies and guidelines to prevent acts of corruption issued by IFS or its subsidiaries.
- Be aware of and fail to report any indication of corruption.

## **7.9 Relationships with Public Officials**

We establish transparent and ethical relationships with public officials.

To do so:

- We respond to regulatory entities and their agents in an honest and transparent manner, complying with the commitments assumed, and providing accurate, appropriate, and timely information for proper supervision.
- We interact with public officials on behalf of IFS or its subsidiaries, with prior authorization from the corresponding authorities.
- We conduct our operations with integrity, impartiality, and free from political influence.
- We do not make donations or contributions to candidates or political parties with the resources of IFS or its subsidiaries. If an employee makes political donations or contributions, they may not be made using the name of IFS or its subsidiaries.

**In IFS and all subsidiaries is prohibited to:**

- Make an offer to a representative of the public sector with the purpose of obtaining favorable treatment.
- Offer or make on behalf of IFS or its subsidiaries, donations, or political contributions to positions or acts developed by candidates, parties, or political organizations.
- Be aware of and fail to report any misconduct with public officials.

## **7.10 Relationships with our Competitors**

We conduct our business based on fair competition, promoting innovation, and continuously improving our products and services.

To do so:

- We respect our competitors, without referring to their brands in a negative or demeaning manner.
- We develop our business and set prices and commercial aspects independently of our competitors.
- We compete fairly and honestly, based on our ethical principles and in compliance with the legal norms of Antitrust.

**In IFS and all subsidiaries is prohibited 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.

#### **7.11 Commitment to honesty**

We are convinced that we will achieve our purpose, mission, and vision by acting honestly in the face of any situation that comes our way.

To do so:

- We reject any dishonest act such as fraud, theft, misappropriation, or misuse of resources of IFS and its subsidiaries, customers, and/or the general public.
- We behave with integrity and transparency in our decision-making.

##### **In IFS and all subsidiaries is prohibited to:**

- Conceal information, carry out fraud, falsifications, provide false information, generate or take advantage of errors or omissions in the procedures, systems, or virtual media to obtain benefits for themselves or in favor of third parties.
- Use ambiguous or misleading terms or explanations, as well as conceal relevant information for making informed decisions.
- Steal, misappropriate money or goods from IFS and its subsidiaries, customers, employees, suppliers, and other Stakeholders.
- Improperly use assets assigned by IFS or its subsidiaries for personal use or third parties or purposes unrelated to their work.
- Encourage others to engage in dishonest or fraudulent acts.
- Be aware of and fail to report any dishonest act.