

Credicorp Compliance and Ethics
Ethics and Conduct Program
Alerta GenÉtica Corporate Policy

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1. Introduction

Credicorp Ltd. and subsidiaries (Credicorp Companies) have established mechanisms for their employees, clients, suppliers and any other stakeholders to report possible fraud, accounting, financial and administrative irregularities as well as possible breaches of the Corporate Code of Ethics and the internal regulations of Credicorp Companies, ensuring the protection of the reporter.

Credicorp has prepared this Policy establishing general guidelines for the correct reception and handling of the reports. This includes monitoring and performance measurement with objective indicators.

2. System Alerta GenÉTICA Credicorp

2.1. Definition

The Alerta GenÉTica System is a set of policies, procedures, and tools that altogether allow the proper reception and handling of reports about any conduct against Credicorp's values and the Corporate Code of Ethics. Stakeholders could send their reports through the channels arranged for them and through the company's leadership.

The reports are sent for the proper investigation and application of disciplinary or corrective actions if needed. The System allows to file reports made in good faith and based on reasonable allegations provided by any employee, supplier, client and other stakeholders of Credicorp Companies

2.2. Principles

- **Confidentiality**

When filing a report, it is not necessary for reporters to identify themselves. In case the reporter wish to be identified, their identity will be kept confidential. Additionally, all particular information regarding the report will be kept confidential, being of exclusive knowledge and use of the investigation or the decision-making responsible, that could be from the Corporate Compliance and Ethics Division, the Investigative Unit and the Board's Sustainability Committee of Credicorp, thus promoting trust in our system.

- **Impartiality**

Investigations are handled impartially by duly qualified personnel adopting a multidisciplinary approach in which responsibilities are not carried out by a single team or employee.

- **Protection**

The Credicorp Companies ensure the protection of the reporter against retaliation or any other form of discrimination or intimidation for filing any type of report.

2.3. Management

Credicorp Sustainability Committee is responsible for supervising the operation of the report system. In accordance with 4205.014.01 Regulation of the Sustainability Committee this function has been delegated to the Compliance and Ethics Division and responsibilities arising from this are detailed in the following section.

Also, 4205.014.14 Regulation of the Audit Committee mentions that this committee is responsible for evaluating reports about accounting transactions or irregular auditing matters that are presented by corporation employees or related third parties.

2.4. Responsibilities

2.4.1. Responsibilities of the ethics committees:

- Cases may be referred to the Ethics Committee of each Credicorp Company or the one acting on its behalf to be resolved, in accordance with the assessment of relevance and complexity carried out by the Corporate Compliance and Ethics Division.

Additionally, related to the procedure established in the 4204.014.01 Corporative Ethics Committee, some reports may be referred to the Credicorp Ethics Committee if it is considered that they may have a potential impact at corporate level.

2.4.2. Responsibilities of the corporate ethics and compliance division:

- Make users aware of the correct use of the System.
- Receive reports through the communication channels established in this Policy.
- Record and keep safe the information, documentation and any evidence related to the report that is received through the channel so that it can be used in the investigation process.
- Submit the reports filed to the investigative units and carry out the corresponding follow-up until taking corrective and disciplinary actions, if applicable.
- Ensure identity confidentiality of the person reporting breaches or misconduct through communication channels, as well as the information included in such reports, investigations, and reviews. Sharing this information with third parties that are not part of the team in charge of the investigation is forbidden unless the information is requested as part of a judicial process or by competent regulators.
- Carry out operational tests on the System.
- Provide annual reports to the Sustainability Committee about the outcome of the reports filed and their status.

2.4.3. Responsibilities of the investigative units:

- Review reports received and carry out the corresponding investigations within the defined time period in coordination with the Corporate Compliance and Ethics Division.
- Keep the report information confidential, making sure it is only shared with the strictly necessary parties in order to carry out the investigation.

- Inform the Compliance and Corporate Ethics Division Management of the conclusions and suggested actions that could be taken.

2.5. Relevant aspects of the complaints procedure

Access to Credicorp Alerta GenÉtica will be available 24 hours a day, 7 days a week through the following channels:

- Credicorp website: (<https://www.grupocredicorp.com/>) through the Alerta GenETICA button that redirects to the following website: <https://secure.ethicspoint.com/domain/media/es/gui/56087/index.html>
- WhatsApp mobile application: +51943116745.
- Corporate mail: alertagenetica@bcp.com.pe
- Mobile version: credicorp.navexone.com

Any person who files a report must consider that it is necessary to provide all the information available to them to help start the investigation. The information that must be provided should include:

- The incident reported. Reporters should narrate to the best of their knowledge about specific fraudulent actions, improper or illegal practices, or specific non-compliances which directly affect the accounting and financial areas, the auditing functions and/or regulatory reports, the Corporate Code of Ethics and the internal regulations of Credicorp.
- The name, position and subsidiary where the parties involved work.
- Date and circumstances in which the reported event was identified.
- Data, documents or any type of instrument that serves as evidence or reasonable supporting indication of the occurrence of the incident being reported.
- A general appreciation, if the identified situation is an isolated or recurrent event.
- Indicate if they consider that there are other parties involved, especially if they are supervisors or managers with responsibility for the area. They should also mention if clients are involved.

3. Resolution and disciplinary actions

Disciplinary actions are proposed by the investigation unit or committee to which each case is ultimately submitted. The Human Development Management Division or the one acting on its behalf in each Credicorp Company executes the corresponding disciplinary actions which could imply the termination of employment contracts without prejudice to further civil and criminal actions.

Document approved by:
Grupo Crédito Board of Directors held on 04/27/2023
Corporate Compliance and Ethics Division