

CORPORATE POLICY ON HUMAN RIGHTS

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1. Introduction

Credicorp Ltd. (herewith, “Credicorp”), and all of the companies that are part of the Credicorp group (herewith “subsidiaries”), respect and promote the fundamental rights of individuals and through its business model and operations, Credicorp seeks to actively contribute to developing a more prosperous, equitable and just society. The aforementioned constitutes an essential element of the company’s plans for action and is aligned with its corporate sustainability strategy.

The policy has been developed in the framework of the Guiding Principles on Business and Human Rights of the United Nations and considers the following standards and international agreements:

- The Universal Declaration of Human Rights (United Nations)
- The Declaration of the International Labor Organization regarding the Fundamental Principles and Rights at Work and its eight fundamental conventions (ILO)
- The Organization for Economic Co-operation and Development (OECD)’s Due Diligence Guidance for Responsible Business Conduct
- National Plan of Action for Businesses and Human Rights 2021-2025
- Principles for Responsible Investment (United Nations)
- The Equator Principles
- Global Compact Principles (United Nations)

2. Objective

The Corporate Human Rights Policy (hereinafter, the Policy) sets forth the guidelines for Credicorp’s commitment to respecting and promoting internationally recognized Human Rights, as well as the regulations and standards applicable to the jurisdictions corresponding to the subsidiaries listed in Annex 1 of this document.

Credicorp respects, protects, promotes, and ensures compliance with these guidelines throughout the development of its activities. This commitment is formalized in the Corporate Code of Ethics.

3. Scope

Compliance with this Policy is the responsibility of all directors, managers, and other Credicorp employees, who must apply it in their day-to-day activities.

In the event of discrepancies between this Policy and local regulations or specific rules of any Credicorp company, the guidelines imposing the stricter requirements shall prevail.

4. Other related policies

Credicorp has different corporate policies, regulations, and codes to address specific dimensions of human rights. The Policy provides a comprehensive vision of the issue and sets the global framework for the specific guidelines set forth in the following documents at the subsidiary level (see Annex 1) as applicable:

- Corporate Code of Ethics
- Corporate Policy for Ethics and Conduct
- Gender Equality Policy
- Credicorp's Sustainability Policy
- Occupational Safety and Health Policy
- Environmental Policy
- BCP Environmental, Social and Governance (ESG) Risk Policy
- Personal Data Protection Policy
- Corporate Alerta GenETICA Policy (ethics line)
- Corporate Policy on the Prevention of Corruption and Bribery
- Corporate General Information Security Policy
- Corporate Policy for the Prevention of Money Laundering and Terrorist Financing
- Supplier Code of Conduct
- Corporate Policy on Responsible and Sustainable Investments
- Internal working regulations

The subsidiaries, depending on the specific characteristics of their businesses, can establish additional policies and procedures that enable compliance with this Corporate Policy.

5. Main Definitions ¹

- Human rights: Rights inherent to all human beings and universal legal guarantees that protect people from actions and omissions that violate their fundamental liberties, rights, and dignity².
- Discrimination: Act of providing different or arbitrary treatment, or treatment that adversely impacts equality of opportunities for employees or third parties, based on race, gender, religion, socio-economic condition, political opinion, sexual orientation, or others. Diminishing or invalidating equal opportunities or treatment in the workplace.
- Stakeholders: The groups with which a subsidiary or Credicorp, as applicable, relate, and which may be affected (positively or negatively) by actions or decisions of the subsidiary or which can affect (positively or negatively) its results by means of actions and decisions. These groups are outlined in the Credicorp's Sustainability Policy.
- Sexual harassment: Undesirable conduct of a sexual or sexist nature by one or more individuals regardless of hierarchy, rank, position, salary level or analogous factors, which creates a climate of humiliation or intimidation.

¹ The definitions used in this section have been developed by Credicorp based on specific internal policies and on official documents and declarations of the United Nations.

² Office of the High Commissioner of the United Nations for Human Rights (OHCHR).

- Related third parties: Suppliers, counterparties, contractors, clients, or partners that have a commercial relation with the Credicorp Group.
- Child labor: Labor that deprives children of their childhood, education, potential or dignity and which generates negative impacts for their physical health and mental development.
- Forced labor: Labor that is performed involuntarily and under any type of threat of punishment. This refers to situations in which people are obligated to work using violence or intimidation, retention of identity documents or threats of being reported to the immigration authorities.
- Human trafficking: Recruiting, transporting, or transferring a person with the use of threats, force, or other forms of coercion, kidnapping or deceit for exploitation purposes.
- Vulnerable populations: Those segments of society that, due to demographic, social, economic, or other factors, are at risk of discrimination or face difficulties in exercising their rights. Each subsidiary will be responsible for defining this concept specifically within the context of its operations.

6. Principles of Action

Credicorp entreats its suppliers, clients, and third parties with which it is related in direct activities and in commercial relations, to apply the guidelines established in this Policy. Within the framework of this responsibility, and under a risk-based management focus, Credicorp:

- Disseminates the commitments assumed and advances in Human Rights management in the annual Sustainability Report.
- Provides effective channels to present complaints or accusations regarding human rights issues and utilizes objective investigation processes to guarantee the confidentiality of information and protect whistleblowers from reprisals. Likewise, based on the investigations conducted and according to each case develops corrective actions and remediation plans appropriate to each situation, aimed at mitigating the likelihood of similar risks occurring in the future.
- Based on the results of the materiality analysis of Credicorp and its subsidiaries, all major Credicorp subsidiaries will conduct an initial Human Rights risk and impact assessment within a maximum period of three years from the approval of this policy. This process may include dialogues with stakeholders, as well as internal learning spaces that allow for feedback and strengthened management. The results of these assessments will influence the prioritized initiatives aimed at ensuring our commitment to Human Rights. Subsequently, this assessment will be updated or reassessed every two years.

With its employees:

- Works to ensure a positive work environment where respect for others, professionalism and trust are first and foremost.
- Protects the safety and health -physical and mental- of its employees and third parties by applying high standards for prevention of occupational safety and health risks.
- Promotes a safe work environment where equal opportunities to all employees in their diversity, without hostility or discrimination, throughout their professional experience is ensured. Strives to have selection and development processes that are free of unconscious bias and are based on merit.
- Prohibits human trafficking or any type of forced labor in its activities.
- Respects the rights of young children and adolescents and rejects the use of child labor in its activities.

- Rejects any kind of intimidation and guarantees a work environment free of violence, harassment, or stalking, whether physical or psychological, in-person or online.
- Respects employees' freedom to associate, form unions and bargain collectively within a legal framework and according to applicable norms.
- Respects the right to freedom of expression and opinion of all employees.
- Offers dignified and reasonable pay in accordance with industry standards, the context and legislation of the countries in which we operate.
- Trains workers in the areas of gender equality, occupational safety and health, ethics and anti-corruption, sustainability, among other topics, to promote a work culture based on respect, dialogue, and tolerance.

Individual clients:

- Provides products and services that generate value for clients based on their needs and specific contexts. During this process, Credicorp provides clear, opportune, and precise information to facilitate decision making.
- Implements requirements to reasonably protect confidential information and to fulfill regulatory requirements for cyber, physical, and banking security.
- Respects the confidentiality of information and protect personal data in accordance with current legislation.
- Subsidiaries contribute to financial inclusion through strategies, programs and initiatives that promote and contribute to closing social gaps.

Corporate clients:

- The subsidiaries that are signatories to the Equator Principles and the Principles for Responsible Investment of the United Nations have mechanisms to incorporate environmental, social and governance mechanisms that include respect for human rights in assessments of their clients and companies in which they invest; the projects they finance; and the business decisions they make within the ambit established in each Agreement.
- Avoid financing companies, operations, or projects with antecedents of transgressions against human rights related to child labor, forced labor and human trafficking that have been proven by public sources and were not remedied. If such situations are identified during the commercial relationship, each case will be assessed individually, and the prevention, mitigation, and remediation of the harms caused will be promoted.
- Credicorp is committed to complying with local and international regulations and directives related to Know Your Customer (KYC) and the prevention of Money Laundering, Terrorist Financing, and/or Financing of the Proliferation of Weapons of Mass Destruction. Accordingly, it has policies, procedures, and guidelines that ensure compliance regarding the entry of funds originating from illicit activities and restricts maintaining commercial relationships with individuals and/or institutions that, after reasonable review, are considered to be engaging in, connected to, involved in an investigation for, and/or sanctioned for activities directly or indirectly related to Money Laundering, Terrorist Financing, and/or Financing of the Proliferation of Weapons of Mass Destruction.
- Encourages its corporate clients to respect, prevent, and mitigate negative impacts on Human Rights affecting their stakeholders and the populations within their area of influence that may be impacted by their direct or indirect operations. Likewise, it recognizes that the responsibility to respect Human Rights varies according to the size, sector, operating context, and nature of their operations.

With its suppliers and related third parties:

- Encourages its suppliers, allies, business partners, consultants, agents, and counterparties (“Suppliers and Third Parties”) to respect and promote the fundamental rights of individuals as part of their business model and operations, in line with the United Nations Guiding Principles on Business and Human Rights.
- Has guidelines that govern the behavior of its Suppliers and Third Parties, which are established in the Supplier and Third-Party Code of Conduct.
- Carries out due diligence processes to assess its Suppliers and Third Parties to identify and prevent possible links to activities that may involve human rights violations.
- Disseminates this Policy and encourages its prioritized suppliers (meaning those that have gone through a Centralized Negotiation Process³ and have billed in the last year) to develop their own guidelines on human rights.
- Disseminates good practices regarding human rights among Prioritized Suppliers and Third Parties.
- Trains suppliers regarding human rights issues, and the use of the ethics line (Alerta GenETICA Credicorp) to report any violation of human rights or ethics.

With the community:

- Strenuously rejects any kind of corruption, bribery, fraud, money laundering or financing of terrorism and has policies, controls, and supervisory mechanisms in place to ensure effective compliance.
- Drives an environmentally responsible culture and implements plans of action to reduce the environmental impact of its activities and operations, according to the stipulations of the [Credicorp’s Environmental Policy](#) and the specific policies of each subsidiary.
 - [Credicorp Responsible and Sustainable Investment Policy](#) (Spanish version)
 - [Responsible Investment Policy – Prima AFP](#) (Spanish version)
 - [Responsible Investment Policy of Pacífico Seguros](#) (Spanish version)
- Promotes respect for human rights in specific spaces for public relations and advocacy, working in alliance with the public sector and society in general.

7. Inquiries and Complaints

Employees can communicate with the Compliance and Ethics teams at each subsidiary to dispel doubts about this policy.

Any act that runs contrary to the principles set forth in this Policy can be denounced by any stakeholder, either anonymously or not, through Alerta GenEtica Credicorp (<https://secure.ethicspoint.com/domain/media/es/gui/56087/index.html>) or other internal channels established for this purpose.

Credicorp has anti-reprisal guidelines that prohibit this type of conduct against any person that has informed about or participated in an investigation of potential failure to comply with regulations or with the subsidiaries’ policies.

³ The criteria for undergoing the Centralized Negotiation Process are: (i) services with billing exceeding US\$100,000 (US\$60,000 in the case of MiBanco), and (ii) services that are of high, extremely high, or significant subcontracting criticality.

8. Case Resolution and Remediation Measures

If any case related to potential non-compliance with the guidelines of this Policy should arise, the Corporate Division of Compliance and Ethics can elevate them to the Ethics Committee; its equivalent at the subsidiary; or the Corporate Ethics Committee. The committee will be responsible for approving the action plans necessary to prevent the recurrence of non-compliance.

9. Governance Model, follow-up, management assessment and reporting

The Corporate Division of Compliance and Ethics must inform the Sustainability Committee of the Credicorp Board about the goals, advances, and challenges of implementing this policy.

Material progress and lessons learned from this Policy will be communicated to the stakeholders through the Sustainability Report or through the means or resources established for this purpose.

| Document approved by: |
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| Credicorp Board of Directors held at the meeting on 05/28/2022 and 10/23/2025 |
| Head of the Division of Compliance and Ethics |
| Head of the Area of Sustainability |

ANNEX N°1
SUBSIDIARIES SUBJECT TO THIS POLICY

1. BCP Peru
2. Pacifico Seguros
3. Prima AFP
4. Mibanco Peru
5. Mibanco Colombia
6. BCP Bolivia
7. Credicorp Capital Ltd. And subsidiaries.
8. Pacifico Salud