



**Code of Ethics and Standards
of Business Conduct**

INTRODUCTION

1. Purpose

This Code of Ethics and Standards of Business Conduct (hereinafter “the Code”), aims to develop the values, principles and standards that guide the actions of the Organization and what is expected of its directors, managers and employees (hereinafter “the Employees”).

For the purposes of this Code any reference to the “Organization” is understood as Intercorp Financial Services Inc. (“IFS”), overall and individually, and all its direct and indirect subsidiaries that currently exist or that may be created in the future.

2. Scope

This Code is directed toward the Organization and each of its directors, managers, Employees and Third Party Workers.

I. Employees

An Employee is a person who is linked by a labor contract with any of the companies that are part of the Organization, also including for these effects the members of the board of directors of the companies that are part of the Organization. In addition to compliance with this Code, the employee shall be required to comply with the laws, the internal rules and policies established by the Organization, by means of each of its companies.

II. Third Party Workers

Third party workers (hereinafter “Third Party Workers”) are individuals, who are different from employees, as they provide services to the Organization under any contract that is not a labor contract, or who are in the service of a contractor or supplier of goods or services, whether they are an individual or legal person, who has entered into a civil or commercial contract with the Organization, and that by reason of any such contract performs services or functions of operational, technical, administrative or commercial support, including also all personal appointed by them that provide outsourcing services.

Therefore, in the development of their functions and tasks with the Organization, Third Party Workers must adapt their conduct to the guidelines established in this Code.

In addition, Third Party Workers are obliged to comply with the laws and contractual obligations that govern the contract on which their connection to the Organization is based. Contractors and suppliers of goods or services linked to the Organization that act as employers or contractors of the Third Party Worker, are contractually obliged to disclose this Code to the Third Party Worker.

III. Collaborators

Every Employee or Third Party Worker must act respectfully regarding the laws, and regulations in this Code and other internal politics of the Organization.

3. Responsible Areas

Approval:

The present Code and any modifications to it will be adopted by the Board of Directors of the companies that compose the Organization.

Questions:

Should any questions arise as to the appropriate course of action in a particular situation, Employees should contact, directly or by means of their immediate supervisor or superior, with the Audit Committee of the company to whom they provide services.

Reporting:

The Organization in all its levels, encourage the avoidance of infractions to this Code of Ethics, and when they occur, their immediate and anonymous reporting to the Audit Committee of the company of the Organization, where the violation took place..

CHAPTER I - GENERAL POLICY AND PRINCIPLES

All Collaborators are responsible for ensuring that the activities of the Organization comply with local laws and international standards, the fulfillment of its Articles of Incorporation and Bylaws and policies adopted by the companies that are part of the Organization, which shall conform to the values, principles and standards set forth herein.

The Organization shall act in accordance with the following values, principles and standards and will establish administrative procedures to control and monitor its contractors and suppliers so that, without prejudicing their own administrative autonomy, they can adopt practices and standards of conduct consistent with the same values, principles and standards.

1.1. - HONESTY

We act with transparency, honesty and respect for all, both internally and externally.

When developing the value of Honesty for Collaborators, their actions will be subjected to the following principles:

1.1.1. - Integrity, Good faith and Loyalty

In the exercise of their functions with the Organization, Employees and Third Party Workers must act with respect, integrity and impartiality, giving true, complete and sufficient information about the progress to achieve their goals or objectives in the Organization.

Employees and Third Party Workers must refrain from behaviors that are or may potentially represent: discrimination, disrespect, threats, defamation, anxiety, intimidation, may threaten their peers and subordinates, or any person with which they interact by virtue of their functions,.

In fulfilling their duty of loyalty, each of the Employees and Third Party Workers is obliged to protect the good name of the Organization and to inform the Audit Committee of the company to which they provide services in the Organization the existence of any conduct which is prejudicial to its good name.

1.1.2. - Impartiality and revelation of conflicts of interest

Employees and Third Party Workers will act in the compliance of the duties assigned to them in an impartial manner. They must refrain from any behavior involving privileged or discriminatory treatment that represents direct or indirect personal benefit.

As part of the duty of transparency, Employees and Third Party Workers will disclose to the appropriate Audit Committee of the companies of the Organization the existence of any actual or potential conflicts of interest.

For the purposes of this Code, a conflict of interest is understood as any situation or event that that could lead the Employee or Third Party Worker to take action for motivations other than that of complying with their duties and/or responsibilities to the Organization. This situations could also originate by involving anyone in their family, spouse or permanent companion or relatives

within the fourth degree of consanguinity, affinity or first degree of kinship by adoption, any partner or partnership (in any form of association), and in general any other individual related to the Employee or Third Party that interfere or may attempt to interfere with the duties incumbent to the Employee or Third Party Worker, or that leads them to, or could lead them to take action for motivations other than that of complying with their duties and/or responsibilities to the Organization.

If any of these events occur, the Employee or Third Party Worker shall immediately and fully disclose to the Organization, through the appropriate Audit Committee (either of IFS or its relevant subsidiary), the matter giving rise to the current or potential conflict.

The appropriate Audit Committee (either of IFS or its relevant subsidiary) will assess the situation and recommend as it sees fit, the adoption of corrective measures it deems appropriate and/or issue the authorizations that it requires.

If a Employee or Third Party Worker has questions regarding a personal situation that could create a potential conflict of interest, or has reason to believe they are engaged in a conflict of interest of this nature they should report, directly or indirectly by its immediate supervisor or superior, the facts in their entirety to the Audit Committee of the company to which they provide services.

In all cases, in the presence of a real or potential conflict of interest, the Employee or Third Party Worker shall abstain from participating in the decision, or the corresponding management or control, while not expressly authorized.

Any Employee or Third Party Worker who knows or receives from any source information on the existence of a real or potential conflict of interest, must inform the appropriate Audit Committee (either of IFS or its relevant subsidiary) immediately.

If a conflict of interest continues after the decision has been taken or the management, handling, or corresponding control, they must also be reported through the above channels.

If the person involved in the decision is a member of the body that will make the decision they must be excluded from the vote. In any case, the act or operation that creates a conflict of interest may only be authorized when it does not harm the interests of the Organization. The authorization shall be in writing and must directly notify the person who made the request. While the authorization has not been properly notified, those involved shall abstain from performing the act and/or the corresponding operation, pending of authorization.

Without prejudicing the obligation to disclose the existence of a conflict of interest when it is present, the Organization shall have the powers to request annual statements from Employees or Third Party Workers about the existence of conflicts of interest.

1.1.3. - Relations with Suppliers and Contractors

The Organization will promote that its contractors and suppliers are respectful of applicable laws on labor, the environment, occupational health and safety, and encourage them to adopt codes of ethics.

The Organization in its business practice will not contract services or supplies on behalf of the Organization with contractors and suppliers that have been linked to an investigation into money laundering, drug trafficking or corruption practices that are in progress, or have been convicted of being engaged in illegal activities or violation of the laws that apply to them.

As part of their functions, Collaborators must assess and distinguish the attention they receive from contractors, suppliers and customers which help them build business relationships, from other efforts aimed at obtaining preferences and advantages in favor of the contractor, supplier or partner that may compromise the impartiality of the Collaborator in the performance of their duties and responsibilities. When in doubt about whether receiving and/or giving attention, the Employee or Third Party Worker must not receive or give anything and should consult directly, or by means of its immediate supervisor or superior with the competent Audit Committee (either of IFS or its relevant subsidiary) for a final decision.

Employees and Third Party Workers must refrain from receiving or giving gifts, or accepting money, loans, services, gratuities, free entertainment, goods, hospitality or favors that constitute some form of reward for the function performed, or which may interfere with the impartiality and management of the matters under their charge using strictly professional criteria. Employees and Third Party Workers must make purchasing decisions based on the best value in terms of total cost, quality and service for the Organization. Similarly, the Organization rejects any practice consisting in the offering of commissions, bonuses or other remuneration to representatives of other company or entity, in order to get a non legitimate benefit for the Organization.

Employees and Third Party Workers will refrain from:

- Offering, promising, paying and/or accepting bribes including favors or inadequate gratuities from any person or entity (including authorities, business partners or suppliers) obtaining benefits, or retain business, for their own benefit or that of the Organization.
- Receiving gifts or accepting money, loans, services, goods, hospitality or favors that constitute some form of reward for the role that they do, or that could interfere with their professional judgment.
- Favoring contracting with individuals or entities, public or private, in which they directly or through another person, or relatives or close friends, have an interest or partnership.
- Lobbying for a family member to be employed, without taking into account the profiles and employment policies established by the Organization and/or the established hiring procedures.
- Use information of the Organization improperly to which they have access, regardless of if it is privileged or confidential, to obtain advantage or favor for individual interests or third parties.
- Performing political campaigning within the Organization.

1.2. - No Discrimination

The Organization is committed to ensuring that its processes of recruitment, promotion and organizational development are guided by the principles of equality of opportunities and fair treatment, they are free from any kind of racial, political and religious discrimination, due to

physical disability, nationality, gender, age, sexual orientation, political orientation, trade union status, or any other cause.

Each Employee and Third Party Worker is expected to promote a culture of non-discrimination and mutual respect.

The policies of selection and hiring of the Employees of the Organization are designed to attract, develop and retain a diverse workforce and to guarantee an inclusive work environment that builds on the strengths of the diversity of people.

Employees and Third Party Workers are not allowed to use the facilities of the Organization for accessing material of a discriminatory nature or to disseminate by communication channels any material that induces conduct that could be defined as discriminatory.

1.3. - Protection of the Rights of Minors: Children and Adolescents

The Organization is committed to protecting the rights of minors, meaning underage children and adolescents below the legal parameters of age as defined by the rules of the different countries where the companies of the Organization operate, against any practices that could be understood as child labor. The minimum age for admission to the Organization for employment is eighteen (18) years, including temporary jobs.

In order to protect the integrity and rights of minors, the Organization is committed to:

- a) Promoting awareness on the part of its Employees and Third Party Workers of the national and international laws that protect the rights of minors.
- b) Reporting to the competent authorities any form of abuse against children, of which they have knowledge.
- c) Prohibiting material with sexual content involving children from being accessed on its premises and prohibiting the use of our communication channels for the dissemination of pornographic images of children.

All Employees have the duty to inform and report to the appropriate Audit Committee (either of IFS or its relevant subsidiary), and/or the competent authorities, as appropriate, of any activity or conduct that the Organization or any of its Employees or Third Party Workers commit which may be categorized as a violation of the rights of minors.

1.4. - Exclusion of Forced Labor

The Organization agrees not to encourage or tolerate any form of work that is considered forced labor under the local laws or international conventions.

1.5. - Compliance with Legal Standards

The Organization will adjust its business conduct to comply with legal standards and reflect the reality of the operations that each of the companies carry out in accordance with applicable accounting principles.

1.6. - Transparency / Zero tolerance of corruption

The Organization will develop its business with transparency and integrity, rejecting all deceptive, dishonest or fraudulent activities and any practice that is deemed to be, or induces, corruption and/or bribery in dealings with public or private entities and officials. In this sense, the Organization shall ensure compliance with anti-corruption laws that apply in the countries where it operates.

We are committed to preventing and fighting against any form of corruption, fraud, money laundering or terrorist financing inside or outside our Organization and will maintain an adequate level of disclosure of our financial and nonfinancial information in a timely, understandable and transparent manner.

1.7. - Protection of Personal Integrity

The Organization shall promote compliance with the laws governing the protection of the integrity of the individual in their working relationships. In this respect, it will promote actions to prevent any of its Employees or Third Party Workers from engaging in behaviors that represent or could potentially represent any kind of discrimination, disrespect, threat, defamation, or instill fear, anxiety, intimidation, or otherwise may threaten the individual freedom of their peers and subordinates, or any person they interact with because of their functions. They will also promote actions to avoid any conduct that constitutes or may constitute harassment or sexual harassment, according to the rules of the countries in which the organization operates.

1.8. - Appropriate Use and Care of Assets and Goods of the Organization

Employees and Third Party Workers must protect the assets and property of the Organization. Such assets and goods include not only those assigned for the development of individual and group work, but also those that the Organization makes available to all Employees and Third Party Workers in general, such as furniture and fixtures, and must be protected against the risks of loss, damage or misappropriation.

The Organization will administratively sanction the behaviors of all Employees and Third Party Workers who by action or omission, propitiate the loss or unauthorized disposition, or misappropriation by third parties, of assets and property of the Organization, including among others, money, securities, invoices, etc. and will declare to the competent authorities any willful or fraudulent conduct of which it is aware and which may be considered a crime.

1.9. - Protection of Intellectual Property

Employees and Third Party Workers must also protect the intangible assets of the Organization, which in general comprise intellectual-property rights, patents, trademarks and trade names of goods or services, domain names, copyright or copy including reproduction rights for software, design rights, database rights, rights regarding specialist technical expertise, trade secrets and proprietary or third party information in power of the Organization, whether or not it is defined as confidential information.

Intellectual property is an intangible asset of maximum value for the Organization. Therefore, the Organization has rules and procedures for its protection, use, reproduction and disclosure, which must be complied with by all Employees and Third Party Workers. In case of doubt about their interpretation, Employees and Third Party Workers should ask for instructions on how they should act to protect this asset.

Employees and Third Party Workers are required to properly respect the intellectual property rights of third parties, including verifying the existence of proper authorization for access to intellectual property.

Developments (such as inventions, patents, trademarks, industrial designs, software, literary and artistic, architectural designs, etc.) that by reason of their functions or by the use of Employees of the Organization, are considered made to order and on behalf and in the name of the relevant employing company, then the Organization has the right to request their transfer without prejudice to the recognition of the individual rights of the respective development. Similarly, if any Third Party Worker, during their development of activities for the Organization makes some kind of innovation or discover, the Organization has the right to request their transfer without any compensation, unless it is agreed in advance and without prejudicing the recognition of the moral rights of the author of the respective development.

1.10. - Confidentiality of Information

Any information generated by the Organization and known by any Employee or Third Party Worker in the exercise of its functions is in principle confidential, unless it is announced as public information by the Organization, in accordance with applicable law.

The dissemination, disclosure, reproduction, removal or delivery of information, by any means to any person, including any Employee or Third Party Worker who is not authorized to be a recipient of the information because of his, her or its function, is not allowed.

Dissemination of information of the Organization may only be carried out through the official communication channels. Upon their withdrawal from the Organization, any Employee or Third Party Worker should return all the information in their possession, whether physical or electronic, without keeping a copy of it, and will continue to be indefinitely bound by the terms of confidentiality.

Any Employee or Third Party Worker (Appointed Personnel) that for any reason, knows or has access to inside information of the Organization as defined in the Insider Trading Policy approved by the companies of the Organization, must adjust their business behavior in full

accordance to the corporate legal guidelines on the handling of privileged information if participating in the public securities market.

The information on processes, procedures, policies, programs, or plans or activities of the Organization in general and the different areas in particular, even if published for internal knowledge through institutional channels of the Organization, is for the exclusive use of any Employee or Third Party Worker by reason of the functions they perform. If a person other than the recipient of the information requests access to it, without exception, the Employee or Third Party Worker should request the necessary authorizations before sharing any information with non-authorized third parties.

The request for information from any Third Party Worker, including any public official, should be made in writing.

Each Employee and Third Party Worker shall be required to maintain the confidentiality of the information they are privy to. In the case of any breach of this duty, the Organization will adopt the pertinent administrative measures, as provided in the respective contracts of employment or the provision of services or local legal regulations that are applicable depending on the country where the Employee or Third Party Worker provides their services.

1.10.1. - Protection and Privacy of Personal Data

The Organization shall ensure the protection of the privacy of personal data of all the various stakeholders that interact with it. In the exercise of their duties, Employees and Third Party Workers have access to personal data of other Employees, contractors, suppliers or customers, be they individuals or corporate clients, and whether that data is scattered or consolidated in any database it must be used exclusively for purposes authorized by the owners of the data according to the internal policies of the Organization and relevant legal regulations, and protections must be in place against risks such as unauthorized access, modification, unauthorized disclosure, loss, destruction or misuse.

The Organization undertakes to obtain, manage, protect and preserve the privacy of the personal data of its Employees, shareholders, contractors, suppliers and customers responsibly, in accordance with the applicable privacy protection laws in each country where it operates, applying the necessary security systems, under the industry standards and state of the art equipment, or that recommended equipment which are reasonably within their reach.

In case of having knowledge about any disclosure, use or improper handling of personal data, the Employee and Third Party Worker shall immediately notify the relevant people in the Organization and must cooperate with the adoption of security and control measures to prevent the risk extending or causing prejudice to the owners of the information and the Organization.

1.11. - Environment and Social Responsibility

The Organization shall ensure compliance with legal regulations, and the adoption of existing or recommended international practices that are applicable to its activities in the countries where it operates. In this respect, it will promote environmental protection and the proper use of natural resources under the same parameters.

CHAPTER II - CODE COMPLIANCE

2.1. - Solution of conflict of interests

In addition to the steps to be followed as described in Item 1.1.2 above, in the case of a conflict of interest involving the CEO, any executive officers or a member of the Board of Directors of company within the Organization, the Audit Committee of IFS or the relevant subsidiary will conduct a preliminary assessment of the situation and report to the Board of Directors of IFS or of the relevant subsidiary, who shall take any corrective measures required and will decide on the best resolution of the conflict, in the form of written authorizing resolutions which should be communicated immediately to the audit Committee of IFS.

2.2. - Protection of information and the complainant

No Employee may engage in hostile acts against, or harass any external person, customer, supplier, contractor, or Employee that submits a question, grievance or complaint concerning an Employee or any other person under the Code.

Any act of retaliation, harassment or discrimination will be taken as a serious violation of the Code and may constitute just cause for the termination of the labor relation with the Employee or Third Party Worker.

No action will be taken against those who in good faith have provided information that is subsequently refuted by internal review and verification.

No member of the Audit Committee of the companies of the Organization, Employee director, manager or employee who in the exercise of their function is aware of complaints or allegations under this Code, may disseminate them either in whole or in part, subject to such exceptions as may be available under applicable law.

2.3. - Penalties for breaching the code

Any breach of the Code by the Board members of the companies of the Organization, will be evaluated first by the appropriate Audit Committee (either of IFS or its relevant subsidiary) and once the facts have been verified, will be made known to the other members of the Board of Directors to take decisions that may be required, including recommendations to the Shareholders for final resolutions when applicable.

Any breach of the Code by managers or Employees will be defined as a breach of their contractual obligations.

Any breach of the Code by suppliers, contractors or Third Party Workers will be evaluated according to the terms of the applicable contract governing the Organization's relationship with such supplier, contractor or Third Party Worker.

In that case the Audit Committee of IFS will be responsible to follow up compliance of the Code and must keep a tidy record of any breach to its guidelines. The latter will be the one in charge to inform the before mentioned breaches to the CEO of the Organization, if necessary.

2.4. - Prevalence of this Code over the internal policies of each company

In case of conflict between the provisions of this Code and internal policies of each company in the Organization, the provisions of this Code will prevail.

Directors of the companies in the Organization will be responsible for harmonizing the policies of the Organization with the contents of this Code.

2.5. - Prevalence of Law over the regulations of this Code

In case of conflict between the regulations of this Code and applicable law, the governing law will prevail.