

CODE OF ETHICS FOR PROFESSIONALS WITH FINANCIAL RESPONSABILITIES

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[Appendix A - LIST OF DIRECTORS, MANAGERS AND OFFICIALS WHO ARE COVERED BY CODE OF ETHICS FOR PROFESSIONAL WITH FINANCIAL RESPONSIBILITY](#)

1. INTRODUCTION

This *Code of Ethics for professionals with financial responsibility* is a complement to Credicorp's Code of Ethics. Credicorp's objective in adopting this code is to provide additional guidelines for the most senior executives of Credicorp and its subsidiaries (which together make up the Corporation), as well as for all professionals who work in areas related to the preparation of financial statements and reports related to Credicorp and/or its subsidiaries; an other personnel within the Corporation who may influence or participate in the preparation of information related to financial matters. The Corporation, if deemed necessary, can implement additional internal policies in relation to this code.

Credicorp expects the above mentioned personnel to act with the highest standards of personal and professional integrity in all their activities; to comply with all applicable laws and regulations; and to dissuade others from acting with wrong intentions.

2. SCOPE

In Appendix A, which is attached to this document, a list of managers and employees can be found to whom the standards of this Code apply.

3. COMPLEMENTARY POLICIES

All personnel subject to this Code agree to comply with the following standards relating to:

3.1 Conflicts of Interest

- a) To use and promote honest and ethical behavior, including the management of real or apparent conflicts of interest, which may arise from personal or professional relationships.
- b) To mitigate the likelihood of affecting customer interests as a result of the services rendered to them.
- c) To avoid exposing employees of the Corporation to conflicts of interest, by adequately assigning tasks and responsibilities.

3.2 Confidentiality

To take all reasonable measures to protect the confidentiality of information regarding the Corporation that is not public knowledge, such as information about clients, especially information that has been obtained or created through the professional's activities, and prevent the unauthorized disclosure of such information, unless it is required by the legal standards in force in the country where the subsidiaries of the Corporation operate

3.3 Important Facts and other information

- a) The following are considered important Facts:
 - Acts, facts, decisions and agreements that may affect the financial situation and/or the results of the Corporation and its subsidiaries.
 - Information that significantly affects or may significantly affect the determination of the price, supply or transaction of the shares or bonds listed and quoted in the New York Stock Exchange (NYSE), or on the stock exchanges where the shares of the companies that constitute the Corporation are listed.

- In general, the information necessary for investors to form an opinion about the risks implicit in the Corporation's operations, its financial situation and its results of operations, as well as that of the securities the Corporation or its subsidiaries have issued.
- b) Those employees who are responsible for participating in the development, generation or sending of important Facts to regulators¹, have the obligation to send this information in a complete, reliable and clear manner, within the established deadlines and in the appropriate format as established by such regulator and before such information can be transferred to a third party.
- c) In addition, employees must review the "Disclosure of Important Facts" section in Credicorp's Corporate Governance Policies.

3.4 Confidential and Inside Information

3.4.1 Confidential Information

To designate as "Reserved" all acts, facts, decisions, agreements or negotiations that are in process, the premature disclosure of which may cause damage to the Corporation, shareholders, clients or employees.

3.4.2 Inside Information

- a) To not disclose any information from and about the Corporation, its business, or to one or more securities it has issued or guaranteed, not disclosed to the market, the public knowledge of which, due to its nature, could influence the liquidity, price or quotation of the securities issued, as well as all information that is considered to be inside information under the regulations where the Corporation operates.
- b) Obtain from using inside information for any reason other than its intended purpose.

3.5 Transparency and Compliance of Laws and Regulations

- a) To help to enable the market to determine in an adequate manner the price of the Corporation's shares or bonds, ensuring that the information that is disclosed is true, clear, sufficient, opportune and quantified where appropriate.
- b) To clarify or refute any information that is false, inexact or incomplete in reference to important facts and other communications, through coordination with the areas referred to under the "Disclosure of Important Facts" section in the Corporate Governance Policies of Credicorp.
- c) To comply with the laws and regulations, related to their professional activities, applicable to the Corporation.
- d) To ensure that no information is concealed, and that no actions are taken that could fraudulently influence, coerce, manipulate or confuse the external auditors of the Corporation, causing them to present financial statements that are misleading.

¹ For the purposes of this Code, the regulators are those entities that establish regulations concerning operations and financial accounting for the Corporation, and with respect to which the Corporation is required to present financial statements and information in accordance with established regulations.

4. COMPLAINTS AND DISCIPLINARY MEASURES

- a) To report any fact (unauthorized use of inside information, conflicts of interest, etc.), based on solid evidence, that could be a possible violation of this Code or its complementary rules. The procedures are outlined in Credicorp's Guidelines for Conduct and Credicorp's Reporting System.
- b) Among the facts that should be reported are the following:
 - Conducting a transaction with inside information.
 - Existence of fraud or attempted fraud.
 - Disappearance of funds or bonds or securities.
 - Alteration of accounting records or financial information.
 - Accounting, financial and / or administrative irregularities, among others.
 - Non-compliance with legal regulations or internal standards of each Credicorp company.
- c) Violations of the Code may result in the application of disciplinary measures, depending on the severity and the concrete analysis of the case, the outcome of which can be the termination of employment of the employee, without prejudice to the civil and criminal actions that may apply.
- d) Any questions regarding this Code can be referred to the Compliance units of the Credicorp companies through the channels provided by them.

APPENDIX A

LIST OF DIRECTORS, MANAGERS AND OFFICIALS, EMPLOYEES WHO ARE COVERED BY THE CODE OF ETHICS FOR PROFESSIONALS WITH FINANCIAL RESPONSABILITY

Credicorp Ltd.

Board of Directors

- All members of the Board
- Secretary of the Board

Management

- Chief Executive Officer
- Chief Operating Officer
- Chief Financial Officer
- Chief Insurance Officer
- Chief Corporate Audit Officer
- Chief Risk Officer
- Chief Investor Relations Officer

Subsidiaries

Board of Directors

- All members of the Board
- Secretary of the Board

Management

- Chief Executive Officer
- Chief Financial Officer/Accounting Manager
- Audit Manager
- Risk Manager
- Every employee who may have access, influence and participation in the preparation of financial statements and related reports of Credicorp and / or its subsidiaries.