



CODE OF ETHICS

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1. WHY DO WE MANAGE WITH ETHICS?

At Interseguro we live a values-based culture, in an ethical framework and with the highest standards of quality, seeking to create value and generate trust in our employees and clients in all our initiatives and in how we manage the business.

It is this way of operating that has allowed us to continue our consolidation and positioning as one of the leading companies in the insurance market. Therefore, this document represents a frame of reference regarding conducts, behaviors and/or actions that violate our culture, values and policies, as well as internal and external regulations that govern the market and our company.

We count on your commitment to enforce this code of ethics and report any inappropriate act or behavior that occurs within our company. We are convinced that acting correctly is the way in which each of us can help Interseguro in our commitment to making it easier for Peruvians to progress safely

Gonzalo

2. OBJECTIVE

The objective of this Code of Ethics is to encourage and promote guidelines, values and behaviors that we seek to cultivate in our employees, clients and suppliers, seeking to prevent and avoid practices that go against our culture.

3. WHO IS THE TARGET AUDIENCE

- Directors, managers and employees of Interseguro.
- Our suppliers.
- Our clients and users.
- Our stakeholders.

4. OUR VALUES

- **WE ARE COMPANY: Union and empathy**, we come together to understand, collaborate with and accompany you on your journey to a better tomorrow.
- **WE MAKE THINGS SIMPLE: Easier**, we look for practical solutions and are transparent and direct.
- **WE BUILD TOMORROW: Innovation and impact**, the better tomorrow is built on tons of questioning, creativity and the desire to do things well. If not today, then when?
- **WE LEARN AND ADVANCE: Resilience and growth**, we make mistakes, we learn, we get up and move forward. At this company, we do not allow fear of trying, growing and taking risks to stop us.
- **WE TAKE CARE OF WHAT WE HAVE: Operational efficiency and sustainability**, we empower, value and maximize the internal and external resources we are given, as a sign of respect, awareness and efficiency.

5. MAKING THE BEST DECISION

We all know that integrity must be a fundamental part of all our daily decisions and behaviors. However, some situations may arise in the performance of our duties for which there may be more than one solution. In such cases, we strongly recommend that you consider the following questions:

- Is the conduct legal, and correct?
- Is the behavior consistent with the Code of Ethics?
- Am I proud of my decision?
- Does my action contribute to building a company with strong ethical culture?

If you answered “NO” or “I DON'T KNOW” to any of the above questions, you should seek assistance or consult with your manager, immediate supervisor or the Compliance Officer to make a better decision.

We must all take a leading role in identifying and reporting misconduct. If we deliberately avoid seeing, hearing or reporting misconduct, we engage in “*willful blindness*”. This makes us complicit in such behavior.

6. REPORTING CHANNELS

All our employees, suppliers, clients or any other interested parties have access, if they wish, to our whistleblower channels, which were implemented to report any inappropriate behavior or activity confidentially and anonymously.

Our employees, clients and suppliers can access them on the web at <https://www.interseguro.pe/canal-etico>.

To ensure the objectivity and confidentiality of the complaints, Interseguro has entrusted the reception and registration of these reports to a specialized company, which will be in charge of forwarding the reported cases to the Ethics Officer. We have appropriate mechanisms in place to prevent retaliation against whistleblowers.

You may also report to:

- Manager or immediate supervisor
- Compliance Officer
- IFS Chief Compliance Officer

7. RESPONSABILITY AND PENALTIES

Failure to comply with the policies and guidelines of this code will result in the imposition of disciplinary measures, in accordance with the severity of the action, according to our internal work regulations.

8. ETHICS POLICIES

8.1. Commitment to our Shareholders and Investors

8.1.1. Integrity of Financial Reports and Operational Reports

- We prepare in a timely, complete and truthful manner Interseguro's financial and non-financial information, presenting it to our regulators, shareholders, directors and stakeholders.

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- We maintain integrity and transparency in the information that supports our decision making

What should we do?

- Maintain accurate, timely, clear and complete data, records, agreements, transactions, operations and commercial, financial and non-financial reports.
- Register the information in compliance with all applicable regulations, accounting practices and standards.
- Read and comply with the guidelines issued by Interseguro on the presentation of financial and non-financial information.
- Disclose complete, fair, timely and clear information in our public communications, regulatory disclosures, and reports submitted to regulatory entities
- Report any case of manipulation or concealment of financial information and operational reports.

What is prohibited?

- Falsifying or manipulating Interseguro financial reports.
- Voluntarily providing or recording incorrect data, such as income, expenses or assets, transactions.
- Improperly recording accounting and auditing acts. Recording in a deliberate, unethical or questionable manner matters with regard to accounting, auditing or operational errors, such as fraud, deliberate errors related to financial statements, and failure to comply with accounting or auditing regulations.
- Allowing or not reporting any of the behaviors detailed above.

8.1.2. Protection of Information

- We respect the confidentiality commitments that we assume with our clients, suppliers and other stakeholders.
- We value the trust our clients and users place in us when they give us their information.
- We treat all information, regardless of its classification, with the highest standard of confidentiality
- We reserve the right to control and inspect the way in which employees use our assets, which may include emails, data and files kept on Interseguro's computers or network, always within the framework of applicable legislation.

What should we do?

- Maintain strict confidence of confidential and privileged information of Interseguro, its shareholders, employees, clients, suppliers and related third parties.
- Use the information to which we have access exclusively for purposes related to our functions.
- Protect privileged information and use it only for corporate purposes and never to obtain benefit from it.
- Adequately comply with applicable laws (national or foreign) regarding the protection of personal data.
- Safeguard the intellectual property of Interseguro, as well as the information systems and the work carried out by our employees.
- Comply with the guidelines issued by Interseguro to preserve information that is privileged, confidential, restricted and for internal use.
- Report any irresponsible behavior that endangers the protection of information.

What is prohibited?

- Using, appropriating, disclosing or improperly handling confidential, restricted or privileged information to which you have had access, for personal benefit, for the benefit of third parties or for any other purpose unrelated to your work or assignments.
- Revealing privileged information, personal data, or other information to third parties.
- Revealing business strategies, campaign information, market strategies, strategic plans and anything relating to data that puts Interseguro's competitiveness at risk.

- Misusing your accesses, deliberately or negligently sharing with third parties—including co-workers—physical accesses, digital accesses, keys or passwords that have been granted to you personally for the exercise of your functions.
- Hiding or failing to report breaches of our information protection guidelines to your immediate superior and the relevant areas.
- Deliberate, negligent or neglectful breach of guidelines regarding information security and personal data protection and policies regarding privileged information that were issued by IFS or Interseguro.

8.1.3. Prevention of Fraud and Dishonest Acts

- We act, convinced that becoming the best insurance company is only possible if we start with the best persons, with employees who are honest under any circumstances.
- We reject any form of fraud, acting with integrity and avoiding concealing, altering or omitting information for the benefit of ourselves or that of third parties.

What should we do?

- Act honestly at all times and under any circumstance.
- Take care of the assets of Interseguro and of our clients.
- Report any case of fraud or dishonest act that you have become aware of.

What is prohibited?

- Carrying out frauds, forgeries and/or falsifications, simulating transactions, registering false information in the systems, deceiving employees or clients, falsifying physical or electronic documents, generating or taking advantage of errors or omissions in procedures, systems or virtual media to obtain benefits for oneself or for third parties
- Stealing, taking money or goods from Interseguro or its clients, employees, suppliers and other people.
- Misusing Interseguro's resources or assets. Improper use of goods assigned by Interseguro, such as computers, telephones, printers, office supplies, taxi vouchers and any good or physical space provided, for personal use or for the use of thirdparty purposes unrelated to your work.

- Inciting employees, suppliers or clients to perform dishonest or fraudulent acts.
- Hiding or failing to disclose dishonest acts or fraud to your superior or through whistleblower channels.
- Improperly collecting payments and withholding money from clients without their knowledge.

8.1.4. Conflict of Interest

- We encourage our collaborators to make the best decisions and to always act in the interest of Interseguro.

What should you know?

- A conflict of interest arises when your personal relationships or activities are incompatible or collide with the objective exercise of your functions and the interests of Interseguro.

What should we do?

- When entering into contracts with clients, employees and suppliers, you must consider internal guidelines and regulations that seek to avoid situations of conflict of interest.
- Select our suppliers taking into consideration their knowledge, experience, technical and service quality, reputation and merits.
- Ensure that our affective relationships and personal interests do not interfere in the performance of our jobs and in our business relationships with suppliers, clients or other stakeholders, nor negatively impact the reputation of Interseguro.
- Report any situation of conflict of interest, whether personal or of third parties, immediately after becoming aware of it.
- Refrain from making a decision in cases in which you have a family or friend relationship with an employee, supplier or client.
- Communicate to the Office of the Vice-President of Administration, Finance and Legal and/or the Human Resources Development and Management Department with regard to cases of business relationships with employees or suppliers that could signify conflicts of interest for Interseguro.
- Report any irregular conflict-of-interest behavior that threatens the interests and reputation of Interseguro.
- Request approval from the Vice President and/or the General Manager and/or Manager, before accepting a proposal for the position of officer or director of an external company, or providing professional services to third parties.

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- Request express written authorization from the Office of Vice-President or from General Management, depending on the position and relationship with the company, before receiving or delivering donations and/or gifts from/to clients or suppliers related to commercial activities.

What is prohibited?

- Attending to transactions or intervening in contracting or selection processes in which family or friends participate.
- Conducting business, meetings or ROSCAs (Rotating Savings and Credit Associations) inside Interseguro with other employees, clients or other stakeholders when doing so might hinder the performance of your functions or hinder objective decision-making.
- Maintaining romantic relationships with employees or suppliers with whom there is a direct or indirect relationship of control, subordination or dependence, as well as in other cases in which doing so may hinder the performance of your functions or hinder objective decision-making.
- Being a shareholder, director or representative of any Interseguro supplier without having the respective authorization, when your functions are related to the service provided by said provider.
- Receiving, requesting or delivering donations and/or gifts to clients or suppliers if you do not have the approval of the Vice-President and/or Manager.
- Managing personal businesses that may hinder the performance of your duties or objective decision-making.
- Take aware of any case of conflict of interest and do not report it.

8.1.5. Responsible Representation of the Company and Strengthening of Reputation

- We represent Interseguro in a responsible manner, even in non-company environments, such as family and social environments.

What should we do?

- Reflect the values of Interseguro at all times, behaving correctly in the workplace, social and family environments.
- Follow Interseguro's guidelines in the different lines of business.
- Make responsible use of personal and corporate social networks.
- Properly manage our personal finances.
- Report any situation that threatens the reputation of Interseguro.

What can we do?

- Represent Interseguro in public settings if we have the express authorization of the Management Committee (Vice Presidents or General Manager), depending on your position.
- Make public statements or declarations at the request of the Interseguro Management Committee (Vice Presidents or General Manager).
- As a company, we do not limit or restrict your participation in political activities; however, such participation is personal and must not bind or jeopardize Interseguro.

What is prohibited?

- Making public statements or declarations that may jeopardize the reputation and image of Interseguro.
- Jeopardizing Interseguro's image in activities of a political, sporting or social nature.
- Any behavior or statement disseminated through physical or digital mass media, or on social networks, that undermines the image or reputation of Interseguro even if carried out in a personal, social or family environment.
- Having a "Deficient", "Doubtful", or "Loss" classification at the credit bureaus.
- Hiding or failing to report these behaviors through the relevant channels.

8.2. Commitment to our Directors and Employees

8.2.1. Diversity, Equal Opportunity, and Respect

- We promote fair and respectful treatment, maintaining an inclusive environment, free from discrimination, harassment, violence or any conduct that threatens people's dignity and integrity.
- We encourage honest communication among Interseguro members.
- We work as a team, convinced that good results are achieved by valuing differences, taking into account the perspectives and contributions of everyone.
- We act with equity, seeking inclusion and mutual recognition of rights and possibilities.

What should we do?

- Provide fair and respectful treatment of all employees, suppliers, clients and users, inside and outside Interseguro's facilities, including outside working hours.
- Promote the professional growth of our employees based on objective and transparent evaluation systems.
- Comply with the guidelines provided by Interseguro in the Policy for the Prevention and Punishment of Violence and Discrimination, the Diversity and Inclusion Policy and the Internal Work Regulations.
- Immediately report any kind of violence, abuse, harassment and/or discrimination that you become aware of.

What is prohibited?

- Intimidation or violence. Aggressive and/or negative verbal or physical behaviors aimed at intentionally intimidating, hurting, frightening, threatening or excluding a particular person or interest group.
- Workplace harassment. Any form of hostile or offensive treatment towards a person in the workplace, by any means.
- Sexual harassment. Sexual innuendo, sexually offensive comments and acts, sexist, indecent or obscene conversations, gestures, comments.
- Discrimination. Any kind of segregation by race, ancestry, gender, age, religion, nationality, academic level, political affiliation, physical disability, marital status, sexual orientation or any other characteristic.
- Allowing or not reporting any of the behaviors detailed above.

8.2.2. Safe and healthy

- We care about providing all our employees and visitors with safe and healthy environments in which to carry out their activities and develop their skills and abilities, allowing for their professional and personal development.

What should we do?

- Read and comply with Interseguro's occupational health and safety guidelines.
- Immediately take action or report risks or accidents so as to allow for the application of necessary measures.
- Immediately report any behavior of employees or visitors that violates the safe and healthy environment that we seek to maintain.

What is prohibited?

- The deliberate failure to comply with workplace health and safety guidelines, whether due to negligence or neglect, and, in general, any behavior that places at risk the health and safety of Interseguro's employees, suppliers or visitors, or that of its facilities.
- Substance abuse. Working or entering Interseguro facilities under the effects of toxic substances, consuming alcoholic beverages, drugs or narcotic substances during working hours.
- Allowing or failing to report noncompliance with these guidelines or with any other security instructions to your immediate superior and the relevant areas.

8.3. Commitment to Authorities

8.3.1. Compliance with Laws, Regulations and Internal Policies

- We comply with all laws, regulations, rules and internal policies applicable to Interseguro.
- We design all our products and services in strict compliance with the internal and external standards applicable to Interseguro, whether issued by national or international organizations.
- We ensure the effective application of appropriate business practices with regards to users, in accordance with the principles of Market Conduct regulated in the current regulatory framework.

What should we do?

- Comply with the laws and regulations imposed by the government which may apply to Interseguro.
- Comply with all the internal policies that Interseguro has defined for the exercise of the functions that have been granted to you.
- Complete and sign the affidavit of assets when required and provide accurate and true information in it.
- Promptly report any indication or incident that involves behaviors or acts that violate the law and/or internal policy.

What is prohibited?

- Advising a client, employee, supplier or other stakeholder to violate, or assisting them in violating, local law and/or the internal policy of Interseguro.
- Failing to comply with internal regulations and provisions, issued by supervisory entities, by Interseguro or by any other pertinent entity, that are applicable to the functions that have been granted to you.
- Not reporting any indication of illegal activities or money laundering, or improperly disclosing any internal investigation related to the possible connection of a client, employee or supplier with these activities.

8.3.2. Anti-Corruption: Prevention of Bribery and Corruption

- We act responsibly and do not tolerate any form of business, transaction or agreement involving any act of corruption or bribery.
- We comply with anti-corruption laws and internal policies aimed at preventing any act of corruption to public or private officials.
- We implement processes and continuous training in order to prevent acts of corruption

What should we do?

- Comply with the guidelines and processes established in our anti-corruption policy.
- Prevent any act of bribery and corruption, both public and private.
- Report any act of corruption or bribery, immediately after becoming aware.

What is prohibited?

- Offering, delivering, requesting or demanding from any person, whether natural or legal, national or foreign, a client, employee, or public or private official, a bribe or illegal reward to carry out an activity related to their functions or obtain or to grant an undue advantage for one oneself or for third parties.
- Negotiate with public or private officials to obtain their own benefit or for Interseguro.
- Making invitations and/or incurring entertainment expenses unrelated to those framed within our expense policy.
- Not reporting any indication of bribery or corruption activities involving a client, employee or supplier.

8.3.3. Relationships with Public Officials and Political Contributions

- We are committed to maintaining relationships marked by integrity with public officials or representatives of the State, always in an honest and transparent manner.
- We are aware that civil service is a highly regulated and sensitive environment; therefore, we have established precise guidelines for the relationship of our employees and representatives with the government.
- We develop our business activities with integrity, impartiality and without any political influence involved.
- We respond to the regulatory entities and their agents honestly and transparently, complying with the commitments assumed, providing accurate, appropriate and timely information for proper supervision.

What should we do?

- Comply with the guidelines and processes established to carry out transactions with the public sector.
- Report any improper act of relationship with public officials and political contributions.

What is prohibited?

- Meeting with public officials on behalf of Interseguro when this has not been approved by the corresponding Vice-President or by the General Manager.
- Making an improper offer to a representative of the public sector in order to obtain favorable treatment personally or for the company.
- Offering or making, on behalf of Interbank, political contributions to positions or acts developed by political candidates, parties or organizations.

8.4. Commitment to our Competitors, Clients, Suppliers and Business Partners

8.4.1. Relationships with our Competitors

- We conduct our business based on free and fair competition, promoting innovation, continually improving our products and services, and generating benefits in the market.
- We develop our business policies, prices and commercial aspects independently from competitors.
- We do not carry out any act that is intended to obstruct, restrict or distort competition.

What should we do?

- Compete fairly and honestly, based on our ethical principles and in full compliance with the legal regulations that regulate the markets.
- Respect our competitors, without referring to the competition or to their brands in a negative or derogatory way.

What is prohibited?

- Taking undue advantage of a position as market leader or entering into agreements with other companies to manipulate marketing conditions, prices or bidding processes.
- Boycotting our competitors by any means, or improperly using the reputation, image or intellectual property of other companies.

8.4.2. Relationships with our Clients

- We enter into fair and honest agreements with our clients, providing them with accurate and transparent information about the services and products we offer so that they can make informed decisions.
- We are committed to maintaining the trust and loyalty of our clients

What should we do?

- Treat our clients with respect and dignity.
- Honor our commitments and be transparent in our relationships with clients.

What is prohibited?

- Resorting to ambiguous or misleading terms or explanations, as well as hiding relevant information so that customers can make informed decisions.
- Performing, allowing or not reporting any misconduct that threatens the interests of our clients.

8.4.3. Relationships with our suppliers, business partners and third parties

- We are transparent and fair in our processes for negotiating and selecting suppliers, taking into consideration their experience, quality of service, reputation and other merits.

What should we do?

- Value our suppliers, business partners and third parties as strategic business allies and recognize their importance in achieving our objectives. Therefore, we seek that our suppliers, business partners and third parties conduct their business ethically.

What is prohibited?

- Improperly favoring a supplier in a selection or award process.
- Requesting or receiving gifts, favors, entertainment or bribes from a supplier.
- Performing, allowing or not reporting any misconduct that reflects a lack of integrity in relationships with our suppliers, business partners and third parties.

8.5. Commitment to the fulfillment of Human Rights

- We care about the safety and health of our employees through the development of a decent working environment that takes measures to minimize occupational risks.
- We reject forced and child labor in all of its forms.
- We work in an environment that promotes equal opportunities for employees, customer, suppliers and users.
- We safeguard the personal data of our employees, customer, suppliers and users by applying protection mechanisms and tools in accordance with the regulatory framework.
- We promote the continuous training and development of our employees through workshops and other formats in which we address topics and subtopics related to the fulfillment of human rights in order to provide them with the necessary tools to apply in each area.

What should we do?

- Comply with the current labor regulations and guarantee freedom of association and collective bargaining.
- Act with transparency, ethics and integrity, guaranteeing the protection of human rights in our relations with our employees.
- Strengthen our selection and hiring processes in order to continue to be a Company free of forced and child labor.
- Strengthen our supplier selection and hiring processes to ensure the meet of decent working conditions and that the rights of their collaborators are exercised and respected.

- Immediately report any breach of labor rights and any type of violence, mistreatment, harassment, bullying and/or discrimination of which you become aware.
- Comply with the information security, personal data protection and insider information policies issued by IFS or Interseguro.

What is prohibited?

- Any practices of forced labor and human trafficking in Interseguro.
- Bullying or violence. Aggressive and/or negative verbal or physical behavior aimed at intimidating, hurting, frightening, threatening, or intentionally excluding a particular person or a particular group of interest.
- Workplace harassment. Any form of hostile or offensive treatment of a person in the workplace, by any means.
- Sexual harassment. Sexual innuendoes, sexually offensive acts and comments, sexist, indecent or obscene conversations, gestures, comments, etc.
- Discrimination. Any kind of segregation based on race, ancestry, gender, age, religion, nationality, academic level, political affiliation, physical disability, marital status, sexual orientation or any other characteristic.
- Use, appropriate, disclose or improperly treat personal data, confidential, restricted or privileged information to which you have access, for personal benefit, third parties or for any other purpose other than your work or assignments.