

**Code:  
CUMP-MAN-001      Code of Ethics and Conduct**

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	<p>The Bank's Code of Ethics and Conduct has the following objectives:</p> <ul style="list-style-type: none"><li>▪ To foster and promote the values and behaviors that we seek to cultivate in the Bank.</li><li>▪ Our directors, employees and stakeholders must always act ethically, regardless of their position, geographical location or level of responsibility.</li><li>▪ To ensure that its business activities are conducted in accordance with legal standards applicable to the Bank.</li><li>▪ To maintain credibility, both institutional and individual, through high standards of ethical and professional behavior, in institutional operations and in generating business.</li><li>▪ Obtain results in an honest, fair, legal, and transparent manner.</li><li>▪ To strengthen the trust of our directors, employees, clients, suppliers and investors, maintaining an environment of transparency and responsibility.</li></ul>
<b>Objective</b>	
<b>Scope</b>	<p>This Code is mandatory for all directors, employees, clients, suppliers, business partners, or interested parties, in order to ensure and strengthen the image of a reliable Bank due to the soundness of its principles and values aligned with those of the economic group that comprise it.</p> <p>We must all be responsible for knowing and complying with this Code and for facilitating its implementation, including the communication of any known non-compliance therewith.</p>
<b>Documents Related to External Standards</b>	<p><b>Central Bank of The Bahamas</b></p> <ul style="list-style-type: none"><li>▪ Guidelines for Corporate Governance related to the Bank's processes, structure, information, and management.</li></ul> <p><b>Laws of the Republic of Panama</b></p> <ul style="list-style-type: none"><li>▪ Law 23 of April 27, 2015 Preventing Money Laundering, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction</li><li>▪ Banking Law of the Republic of Panama</li><li>▪ Labor Code of the Republic of Panama</li></ul> <p><b>Superintendacy of Banks of Panama</b></p> <ul style="list-style-type: none"><li>▪ Rule 2-2019, whereby Rule 10-2015 on preventing the misuse of banking and trust services is amended</li><li>▪ Rule 13-2018, whereby Rule 10-2015 is amended</li><li>▪ Rule 1-2017, whereby Rule 01-2015 to prevent the misuse of banking and trust services is amended</li><li>▪ Rule 10-2015 to prevent the misuse of banking and trust services</li><li>▪ Rule 5 - 2011 Corporate Governance provisions</li></ul>

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**Corporate  
Documents  
Intercorp Financial  
Services**

- Code of Ethics and Standards of Business Conduct
  - Corporate Governance Manual
  - Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) Manual
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**Policies:**

- Corporate Governance
- Information Asset Management
- Management of Suppliers and Third Parties
- Operational Risk Management
- Facilities Security
- Anti-Corruption and Bribery
- Use of Confidential Information
- Use of Mobile Devices
- Use of email and internet
- Information Systems Security
- Password Management
- Human Development and Management

**Processes:**

- Ethical Whistleblower Channel Management
- Staff Selection
- Staff Onboarding and Hiring

**Management of Prevention-AML/CFT Policies**

- Client Onboarding
- Know Your Employee
- Know Your Financial Intermediary
- Ongoing Client Due Diligence
- Tax Compliance for U.S. Clients Abroad
- Client Compliance Risk Rating

**Processes**

- Client Investigation
  - Monitoring of Alerts
  - Unusual Transaction Analysis
  - Updating of Employee Data
  - Financial Intermediary Due Diligence
  - Interm. Due Diligence to Bank and Account Opening
  - Ongoing Client Due Diligence
  - Enhanced Client Due Diligence
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**Other Related  
Policies and  
Processes, cont.**

Procedures

- Investigation
  - Monitoring
  - How to Check Background – Client Onboarding and High Risk Account
  - How to Check Background - Transfers Sent to Third Parties
  - How to Check Background – Onboarding Moderate or Low Risk Clients
  - How to Check Background - Data update
  - Preventive Freezing
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- Willful Blindness: Intentionally failing to see, hear or report inappropriate behavior that makes us complicit in such behavior.

- Conflict of Interest: This is understood as a situation whereby a member of the Board of Directors, an employee, among others, who must make a decision or perform or omit an action due to their functions, has the option to choose between the interest of the Bank, client, user or supplier and their own interest, that of their family or of a third party in such a way that by choosing one of these last three, they would benefit financially or extra financially for themselves, their family or third party, ignoring their ethical, legal or contractual duty and obtaining an advantage that they would not otherwise receive.

**Definitions**

- Appropriate Reporting Line: This refers to the upward reporting hierarchy.
  - Stakeholders: This refers to clients, employees, directors, suppliers, business partners, and third parties with whom we have a direct or indirect relationship.
  - Corporate Values: Value is understood as what makes a person act, guiding the person's action; from an organizational point of view, values are what govern staff behavior, aligned with the achievement of the mission, vision and strategic objectives of the Bank.
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**Related Annexes**

- Internal Labor Regulations
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**Vision**

To ensure that our clients are the best advised in Latin America.

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**Mission**

To advise our clients and their families in the management of their wealth throughout their lives.

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**Corporate Values  
Guiding Our  
Management**

- **Client Focused:** We put our internal and external customers first, serving them with commitment and initiative.
  - **Excellence:** We do things extraordinarily well by going beyond our limits, challenging ourselves to grow and learn.
  - **Integrity:** We act with transparency, are guided by solid principles, and are fair and ethical.
  - **Teamwork:** We give our best to achieve together the common goal that unites us.
  - **Sense of Humor:** We enjoy what we do, transmit well-being to others, laughing at ourselves.
  - **Innovation:** We explore, experiment and learn constantly to find new solutions that transform our company.
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**Bank Secrecy**

- We will only disclose information about our clients or their operations with their express consent, except when formally requested by a competent authority in accordance with the law.
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## **Our Principles**

**Loyalty**

In fulfilling their duty of loyalty, each director, employee and stakeholder is obliged to protect the good name of the Bank. All persons connected with the Bank must comply with the laws of fidelity, honor and act legally and truthfully.

In accordance with this principle, they are obliged to devote their activity to the exclusive benefit of their stakeholders, in such a way that the benefit of their management is passed on in full to the latter, without prejudice to the compensation for the management carried out.

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**Transparency**

The Bank must maintain clear conditions in its operations to enable appropriate decision-making, and it must keep its stakeholders informed of all circumstances relevant to their interests.

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***Our Principles, cont.***

***Equity***

The Bank must establish a level playing field by granting equal conditions for its services and products without considering personal or third party benefits.

To maintain the Bank's resources available to its clients and to perform in an effective, sufficient and satisfactory manner so that the objectives sought are met without deviating from legal mandates and ethical principles.

***Diligence***

To this end, it must undertake:

- ✓ To act with rectitude.
- ✓ To provide services without expecting any remuneration other than that agreed.
- ✓ To inform clients of the characteristics and conditions of the services provided and the possibilities available to the institution to serve them.

***Work Scheme and Responsibilities of the Ethics and Conduct Committee***

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***Organization***

- The Ethics and Conduct Committee shall be comprised of the following:
  - ✓ General Manager
  - ✓ International Division Manager
  - ✓ Human Development Management Manager
  - ✓ Compliance Manager
  - ✓ Legal Manager

***Administration of  
the Code of Ethics  
and Conduct***

- The Ethics and Conduct Committee will be responsible for assessing and updating this Code, reviewing and implementing the necessary mechanisms to disseminate and promote the highest standards of behavior in the Bank.

***Reporting  
Channels and  
Whistleblower  
Protection***

- All our employees, directors, suppliers, clients or any other stakeholder may report anonymously if required through the channels implemented to report any inappropriate behavior.  
This can be done through the following means:
  - ✓ Web channel <https://canaleticointeligo.lineaseticas.com/>
  - ✓ Telephone exchange: 0080-0052-0569
- To ensure objectivity and confidentiality of complaints, the Bank has commissioned a specialized company to receive and register them, which will be responsible for referring the cases to the person in charge of managing the ethical channel and activate the protocol for scaling up complaints in such cases where necessary.

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**Work Scheme and Responsibilities of the Ethics and Conduct Committee**

**Functions of the  
Ethics and  
Conduct  
Committee**

- To decide on actions to be taken and recommend corrective actions on cases of non-compliance with the ethics policy and guidelines that are submitted thereto.
  - Any other situation where there is doubt due to not being covered by this Code, should be consulted with the Ethics and Conduct Committee for due verification.
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- It is the responsibility of each of the Bank's members to notify when they become aware of any non-compliance with the Code of Ethics, related to:
    - ✓ Conflict of interest
    - ✓ Suspicious activity,
    - ✓ Insider trading,
    - ✓ Fraud or attempted fraud,
    - ✓ Accounting records that do not comply with international financial reporting standards
    - ✓ Any mysterious disappearance of funds or securities.
    - ✓ Anti-Corruption and Bribery Policy

**Non-Compliance  
Report**

You may do so by contacting the person(s) appointed by the Bank for this purpose, through the ethical reporting channel established therefor.

- The Human Development and Management Manager will keep a record and custody of infringements, including dates of the events and actions taken, which must be considered confidential. Except as required by law or this Code, such matters will not be disclosed to anyone outside the Ethics and Conduct Committee and the Board of Directors of the Bank.
- The Audit Committee and the Board of Directors shall be responsible, according to the reports submitted by the Human Development and Management Area, for monitoring and ensuring compliance with the stipulations of the Code of Ethics and Conduct.
- Any situation not covered in this section of penalties will be managed in accordance with local labor regulations.

**Commitment to Our Directors and Employees**

**Personal Finance  
Management**

- We must manage our personal finances properly to avoid situations that affect the Bank's image.
- We must refrain from being guarantors for any type of commercial transaction carried out by another employee or a client.

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**Commitment to Our Directors and Employees**

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- We foster a motivating and creative environment, where promotions, career paths and salaries are available on equal terms to all, according to the knowledge, attitudes, skills, and merits required for the different jobs.
- We cultivate an inclusive and collaborative culture to retain our talents and maximize their potential.
- We value and promote cultural diversity and gender equality within our work teams, maintaining an environment of respect and valuing individual differences to take advantage of the talent of each employee, free from harassment.
- We encourage honest communications between Bank members.
- We consult when necessary and respect the opinions of those who differ from us.
- We respect the work environment and build trusting relationships with our directors, maintaining a safe and inclusive environment with respectful, fair, dignified, and courteous relationships with each other.

**Diversity, Equal Opportunities and Respect**

**What is forbidden?**

- Aggressive verbal or physical behaviors aimed at intimidating, hurting, scaring, threatening, or intentionally excluding a person or stakeholders in particular.
- Hostile or offensive treatment of a person in the workplace, by any means.
- Sexual advances, sexually offensive acts and comments, conversations, gestures, sexist, indecent or obscene comments.
- Discrimination on the basis of race, ancestry, gender, age, religion, nationality, educational background, political affiliation, physical disability, marital status, sexual orientation, or any other characteristic. The above characteristics will also not influence job opportunities, professional and personal development of the employees.
- Allow or refrain from reporting any conduct that violates the integrity of the individual.

**Sexual or Psychological Harassment**

- We practice zero tolerance for sexual or psychological harassment or acts of intimidation of any kind.
- We reject any form of activity that is considered forced labor under the laws or international conventions.
- We must show consideration and respect for others and abandon any attitude deemed offensive by another person at the first sign thereof.

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**Commitment to Our Directors and Employees**

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**Training**

- All directors and employees are required to attend any training that the Bank deems necessary.

**Proper Use and  
Care of the Bank's  
Property and  
Assets**

- We must protect the Bank's assets and property. Such assets and property include not only those assigned to the performance of individual and group work, but also those that the Bank makes available to all directors, employees or stakeholders, such as furniture and furnishings, protecting them against risks of loss, damage or misappropriation.
- Refrain from using:
  - ✓ Equipment or facilities assigned for the performance of their duties for particular purposes.
  - ✓ Time of working day for personal matters.
  - ✓ Technology, methods and processes developed for the use of the Bank for particular purposes or benefit of third parties.

**Language and  
Tone of Voice to  
be Used**

- When interacting with clients, co-workers, directors, suppliers, third parties or any other person, we must use appropriate language and tone of voice, where courtesy and respect prevail.

**Social  
Responsibility**

- We comply with legal standards and the implementation of existing or recommended international best practices regarding social responsibility.
- We promote a culture of safety based on prevention, maintaining a safe and healthy work environment for the directors, employees, and visitors, complying at all times with the safety provisions established by the Bank.
- We take action and report risks or accidents promptly to implement the necessary measures.
- perform our duties in an environment free of alcohol or drug consumption.

**Safe and Healthy  
Environment**

**What is forbidden?**

- The deliberate, negligent or careless breach of the safety and health guidelines issued by the Bank.
- Any behavior that puts at risk the safety and health of directors, employees, and third parties on the premises.
- Using, working or entering the Bank under the influence of toxic substances, alcoholic beverages or drugs during the performance of our duties or outside of our working hours as long as we are on the premises of the Bank.

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**Commitment to Our Directors and Employees**

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**Safe and Healthy  
Environment,  
cont.**

**What is forbidden?**

- Smoking inside the Bank's facilities.
  - Allow or refrain from reporting conduct that threatens the safe and healthy environment at the Bank.
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- Every person in a supervisory position should model the behaviors they expect from their staff and strengthen mutual feedback with their team with respect and empathy.

- The high level of professionalism in the interpersonal management of the Bank's directors and staff will be characterized mainly by:

- ✓ Quality of results obtained in teamwork.
- ✓ Satisfaction of the Bank's clients.
- ✓ Productivity and results-oriented work environment.
- ✓ Respect for individual differences and opinions contrary to one's own.

- ✓ Fair, objective and equitable treatment in the working relationship.

- ✓ Facility for organizational and human development and growth.

- ✓ Rejection of harmful behaviors, such as using degrading words to describe a person, talking behind others' backs, tolerating alcohol and drug addiction.

- ✓ To carry out the tasks assigned by superiors and comply with the instructions given by them and the relevant hierarchical bodies, adopt open communication for advice and help, as well as an attitude of transparency, in dealing with superiors and other co-workers.

- ✓ Compliance with institutional policies, standards and procedures.

- Attitudes such as withholding information from superiors or co-workers that could affect the performance of work, especially for the purpose of personal gain, or providing false, inaccurate or distorted data, refusing to collaborate with co-workers or practicing any form of obstruction, are contrary to the kind of loyalty that can be expected from all directors and employees of the Bank.

- We must keep co-workers who have a relationship with the Bank informed of the work in progress and allow them to contribute.
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**Employment  
Outside the Bank**

- Hold positions as a director, partner, consultant or any paid employment with institutions or corporations where there is a business relationship or are considered as competitors. In the event of this situation, written notification to the Bank and its approval is required.
- An employee may accept part-time employment outside the Bank in coordination with their immediate manager, as long as those obligations do not interfere with the employee's work, that is, another Bank or Financial Institution.
- Management must consider aspects, such as:
  - ✓ Avoiding conflicts of interest.
  - ✓ That this work does not influence the physical or mental rest that the employee needs to work satisfactorily in the Bank.
  - ✓ If the employee suffers an accident at work (occupational hazards) in the other job, it would not be the Bank's responsibility to acknowledge such disability.
- In case of doubt, managers are advised to consult the General Manager if such a situation arises.

**Relationship,  
Consanguinity  
and Affinity**

- The Bank will avoid hiring family members of directors, employees or active stakeholders up to the third degree of consanguinity and affinity to maintain the Bank's objectivity in its decisions.
- Any relationship or affinity that may arise in the work environment must be notified to the Department of Human Development and Management at the time it becomes known, for the corresponding evaluation with the General Manager. Annex No.1 shows the degrees of Consanguinity and Affinity.

**Private  
Investments**

- Although the Bank does not intend to limit the private investment activities of its directors and employees, nor those of their respective associates, it considers that they should avoid participating in investment transactions that could generate a conflict of interest between the directors, the employee, the Bank or a client.
- The following specific situations should be avoided when making an investment decision:
  - ✓ Making investments in securities in companies owned by a supplier, borrower or competitor, as these investments could be considered to affect the judgment of the employee when acting on behalf of the Bank.
  - ✓ Making investments in a company where there is a possibility of using private information related to that company.
  - ✓ Making investments for an employee or in the account of an employee or in that of their immediate family members, from a client of the Bank or of any company within the Group.
  - ✓ Making investments sponsored by a client in circumstances that may give rise to conflicts of interest or the appearance of such conflicts.
  - ✓ Carrying out activities in parallel investments or in anticipation of an investment by the Bank of any of the companies in the Group.

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**Commitment to Our Shareholders and Investors**

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**Relationship with  
Shareholders**

- Relations with our shareholders will be based on transparent, objective and timely communications, which will allow them to monitor the progress and performance of the Bank at all times according to the parameters established in the Corporate Governance Manual.
  - Information that has not been publicly disclosed must be kept confidential in order to protect the interests of the Bank's shareholders.
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**Integrity of  
Financial Reports**

- We ensure the timely, complete, correct, and accurate recording of transactions and operations for the purpose of reporting appropriate information for decision making.
- We maintain accurate, timely, clear, and complete financial data, records, agreements, transactions, operations, and reports.
- We record information in compliance with applicable accounting controls, regulations, practices and other standards
- We disclose complete, fair, timely, and clear information in our public communications, regulatory disclosures and reports submitted to shareholders, investors and regulators

**What is forbidden?**

- Falsifying or manipulating in any way financial reports.
  - Voluntarily providing or recording false or misleading accounting or auditing data.
  - Allowing or refraining from reporting, conduct that undermines the integrity and transparency of information.
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**Protection of  
Classified  
Information and  
Intellectual  
Property**

- We protect the confidential information of our Bank, directors, employees, clients, suppliers, and other stakeholders.
  - We use insider information responsibly, solely for corporate purposes and prevent it from being used for other purposes.
  - We protect our intellectual property and our information systems, encouraging the appropriate use of the information we reproduce or distribute by any physical or electronic means.
  - We reserve the right to monitor and inspect the manner in which the directors and employees use our assets, which may include e-mails, data and files maintained on the Bank's equipment or network; always within the framework of applicable legislation.
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**Commitment to Our Shareholders and Investors**

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**Protection of  
Classified  
Information and  
Intellectual  
Property, cont.**

*What is forbidden?*

- Using, appropriating or improperly disclosing confidential, restricted or privileged information without authorization, including personal data of clients, directors and employees, as well as information protected by specific laws and regulations applicable in the financial sector, stock market or internal policies.
  - Disclose business strategies, campaign information, market strategies, strategic plans, and anything related to data that may place the competitiveness of the Bank at risk.
  - Improperly using accesses, keys or passwords that have been provided personally for performing functions.
  - The deliberate, negligent or careless breach of guidelines on information security, protection of personal data and privileged information policies issued in the Bank.
  - Concealing or refraining from reporting any misuse or violation of classified information and intellectual property
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- We reject any form of fraud by acting with integrity and avoid covering up, altering or omitting information for private gain or that of third parties.
  - We take care of the Bank's resources by using them responsibly and honestly to do our job.

*What is forbidden?*

**Prevention of  
Internal and  
External Fraud**

- Any act that involves the use of deception to obtain an unfair or illegal advantage or any personal benefit.
- Theft, misappropriation of money or property of the Bank or of clients, directors, employees, suppliers, and other persons.
- Misuse of the resources or assets of the Bank allocated for the work.
- Inciting directors, employees, suppliers, or clients to participate in dishonest or fraudulent acts.
- Concealing or refraining from disclosing dishonest or fraudulent acts through appropriate channels.

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## ***Commitment to Our Shareholders and Investors***

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- We avoid situations in which our relationships or personal interests may unduly influence the performance of our responsibilities or work decisions.
- We consult and seek approval of the appropriate reporting lines in case we identify any situation that may affect or have the appearance of affecting our ability to make the best decisions for the benefit of the Bank.
- We reject conduct in which gifts, hospitality and entertainment influence objective decision making.
- We report any irregular conflict of interest behavior that undermines the interests and reputation of the Bank, as set forth in our selection and hiring guidelines.

### *What is forbidden?*

- Conducting personal business within and outside the Bank that may hinder the performance of duties or objective decision making.
- Handling transactions or intervening in processes of recruitment or selection involving family members or friends.
- Maintaining sentimental relationships with employees, directors or suppliers with whom there is a direct relationship of control, subordination or reporting, as well as in other cases where this may hamper objective decision making.
- Making or becoming aware of any conflict of interest and not reporting it.
- Being a shareholder, director or representative of any supplier of the Bank, without having the respective authorization when your functions are related to the service provided by such supplier.

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- We represent the Bank in a responsible manner, including in environments not related to our work, such as family and social settings, within the framework of upright behavior and within the law.
  - We protect and strengthen the image, reputation, assets, and culture of integrity of the Bank and that stakeholders comply with our ethical standards.
  - We carry out off-site activities in a responsible manner, always taking care of our reputation, including the responsible use of our personal social networks.

### ***Protection of Reputation***

### *What is forbidden?*

- Any behavior or statement disseminated through physical or digital mass media, in social networks, that undermines the image or reputation of the Bank, even if it has been made in a personal, social or family sphere.
- Engaging the image of the Bank in personal activities of a political, sporting or social nature.
- Concealing or refraining from reporting conduct that may affect our reputation

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**Commitment to Authorities**

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- The courtesy of the Bank and its representatives to members of regulatory bodies should be an institutional feature. These relations should not be used for personal gain or benefit of the Bank as a work team member of the Bank. We must at all times observe high civic standards and respect the laws.
- The Bank is subject to a number of laws and regulations governing its operations in different countries. We have therefore adopted a culture of continuous updating to meet legal standards and reflect the reality of operations in accordance with applicable accounting principles.
- We must know and understand the legal aspects applicable to the performance of the assigned tasks, to the activity of the department and the Bank as a whole, in order to avoid any legal problems to the Bank.

**Relationship with  
the Public Sector,  
Compliance with  
Laws and  
Regulations**

- We comply with national and international regulations issued in the jurisdictions applicable to the Bank.
- We ensure compliance with the Bank's internal policies and guidelines to conduct business with integrity.

**What is forbidden?**

- The deliberate, negligent or careless breach of compliance policies and guidelines, as well as any breach of national and international regulations applicable to the Bank.
- Omitting or refraining from immediately reporting any indication or incident involving behavior that goes against the guidelines of integrity and compliance of the Bank.
- We implement robust processes and are continuously training to prevent any activity related to money laundering and financing of terrorism.
- We promote a culture of compliance based on integrity and transparency in the execution of the internal controls established through policies, processes and procedures related to the anti-money laundering and countering the financing of terrorism system.
- We undertake to comply with and put into practice the behavioral guidelines established for the purpose of ensuring the duty of undisclosed confidentiality of information related to the anti-money laundering and countering the financing of terrorism system, which includes the following
  - ✓ Cooperating fully with local judicial and regulatory authorities and operating in full compliance with applicable laws and regulations.
  - ✓ Know Our Client.
  - ✓ Reporting suspicious transactions.
  - ✓ Developing an anti-money laundering environment through procedures, training and awareness.

**Anti-Money  
Laundering and  
Countering the  
Financing of  
Terrorism**

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### ***Commitment to Authorities***

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- We act in a responsible manner, complying with anti-corruption laws and the Bank's policies and guidelines aimed at preventing any act of corruption by public and private officials.
- We implement processes and receive continuous training to prevent acts of corruption.

#### *What is forbidden?*

- Offering, promising, delivering, soliciting or accepting any kind of reward, benefit or incentive (gift, care or any other effect of value), as well as any contribution, donation or sponsorship in a personal capacity, of the Bank, for a public or private official to act or refrain from acting in an official capacity, or to improperly influence a business decision.
- Negotiating with individuals from private or public entities to obtain an undue advantage for the Bank.
- The deliberate, negligent or careless breach of policies and guidelines issued by the Bank for the prevention of acts of corruption.
- Concealing any indication of activities of bribery or corruption involving a client, employee or supplier.

### ***Prevention of Corruption***

- We establish transparent and ethical relations with authorities and public officials. Any meeting on behalf of the Bank must be held with the prior authorization of the appropriate reporting lines.

- We respond to regulators and their agents in an honest and transparent manner, fulfilling assumed commitments, providing accurate, appropriate, and timely information for proper supervision.

- We carry out our business activities with integrity, impartiality and without any political influence.

### ***Relationship with Public Officials***

- We do not make donations or political contributions to candidates or parties with the Bank's resources. If an employee makes political donations or contributions, in no case shall they be made using the name of Inteligo Bank.

#### *What is forbidden?*

- Making an offer to a public sector representative with the purpose of obtaining favorable treatment.
- Offering or making political donations or contributions on behalf of the Bank to positions or events held by political candidates, parties or organizations.
- Allowing or failing to report any misconduct with public officials.

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### ***Commitment to Authorities***

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- The Bank's directors and employees are personally free to participate in political activities in the community, in their free time. This participation is voluntary and any opinions expressed are in their own name and not in representation of the Bank.

***Participation in  
Political Activities***

- Refraining from using the Bank's or the Group's trademark in any meeting, press release, news item or article related to political activities.
  - It is forbidden to carry out proselytizing, political or religious activities on the Bank's facilities or in meetings.
  - No individual political effort will be compensated or reimbursed by the Bank.
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***Participation in  
Non-Profit  
Organizations***

- Some directors and employees generously contribute their time to a variety of organizations such as civic, religious, charitable, cultural, and educational organizations. The Bank supports these efforts, however, care must be taken with the following:
    - ✓ Serving in one of these non-profit entities is done in a personal capacity and should not imply or mention that the Bank contributes to such organization.
    - ✓ The use of the Bank's facilities, time and other resources for the benefit of these non-profit entities should be consulted with and duly approved by the General Manager.
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### ***Commitment to Our Competitors, Clients, Suppliers, and Business Partners***

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***Relationship with  
Our Competitors***

- We refrain from making comments that may affect the image of competitors, referring to competitors or their brands in a negative or derogatory manner or continue to spread rumors about them. Treating other financial institutions with the same treatment that the Bank expects to be treated.
  - We conduct our business based on free and fair competition, promoting innovation, continuously improving our products and services, and generating profits in the marketplace.
  - We develop our business policies, prices and commercial aspects independently from competitors.
  - We compete in a fair and honest manner, based on our ethical principles and in full compliance with the legal standards that regulate the markets.
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## **Commitment to Our Competitors, Clients, Suppliers, and Business Partners**

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- We avoid carrying out acts that are intended to hinder, restrict or distort competition.

### ***What is forbidden?***

#### ***Relationship with Our Competitors, Cont.***

- Taking undue advantage of the position of market leader or making agreements with other companies to manipulate marketing conditions, prices or bidding processes.
- Boycotting our competitors by any means, or misuse the reputation, image or intellectual property of other companies.
- Conducting, allowing or omitting to report any anti-competitive conduct.

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- Our commitment to our clients' satisfaction will be demonstrated by respect and the search of solutions to their needs, maintaining a balance with the Bank's business and profitability objectives.
  - We treat our clients with courtesy, respect and dignity, providing them with clear, concise and transparent information to make informed decisions. At no time should we give preferential treatment to our clients because of their own interests or personal affinity.
  - Those directors and employees entitled to request information from the clients or future clients of the Bank will request the necessary information for their proper identification, as well as information about their financial situation, business plans or future objectives, when these are relevant to the services offered or to be offered to them, always based on their risk profile.

#### ***Relationship with Our Clients***

- Non-public information obtained from clients or future clients, in accordance with the above, will be treated as confidential information.
- We honor our commitments and are transparent in our relationships with clients.
- We are committed to maintaining the trust and loyalty of our clients.

### ***What is forbidden?***

- Resorting to ambiguous or misleading terms or explanations, as well as withholding relevant information so that clients can make informed decisions.
- Making, allowing or failing to report any misconduct that is against the interests of our clients.

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This Document shall be used as an instrument for executing each Audit.

**Code:  
CUMP-MAN-001      Code of Ethics and Conduct**

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**Commitment to Our Competitors, Clients, Suppliers, and Business Partners**

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**Relationship with  
Our Suppliers,  
Business partners  
and Third Parties**

- The Bank refrains from hiring suppliers who:
  - ✓ Are linked to an investigation into money laundering, drug trafficking or corruption, or are convicted of participating in illegal activities or in violation of the laws that apply to them.
  - ✓ Have family relationships with directors, employees of the Bank or legal entities whose controlling person is one of such persons, except in cases where the Board of Directors approves their hiring.
- We value our suppliers, business partners and third parties, as strategic business allies and recognize their importance in achieving our objectives. Therefore, we seek to ensure that they conduct their business ethically.
- We are transparent and fair in our processes of negotiation and selection of suppliers taking into account their background, quality of service, reputation and other merits, as well as rejecting any practice that consists in offering commissions, bonuses or other improper remuneration in order to obtain an illegitimate benefit..

**What is forbidden?**

- Unduly favoring a supplier in a selection or award process.
- Soliciting or receiving gifts, entertainment or bribes from a supplier.
- Making, allowing or failing to report any misconduct that reflects a lack of integrity in the relationship with our suppliers, business partners and third parties.

**Ethical Guidelines**

All directors, employees and stakeholders are responsible for knowing and understanding the conditions set forth in the Code of Ethics and Conduct.

Any failure to comply with the provisions of this Code will result in disciplinary penalties including observations, penalties and dismissal.

**Offenses and  
Penalties**

Minor offenses are those that do not comply with the instructions given in the Code of Ethics and Conduct, standards, policies and guidelines approved by the Bank.

The applicable penalty will be a verbal warning under the responsibility of the Area Manager or the applicable local labor regulations.

Less serious offenses correspond to reiterative non-compliance with the instructions given in the Code of Ethics and Conduct, standards, policies, and guidelines approved by the Bank, during the term of one year from the offense.

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## **Ethical Guidelines**

The applicable penalty would be a written warning under the responsibility of the Area Manager or the applicable local labor regulations.

Serious offenses are those that are proven to have been committed for money laundering or terrorist financing fraud, in violation of our Code of Ethics and Conduct, standards, policies, and guidelines approved by the Bank.

The applicable penalty will be under the responsibility of the General Manager of the Bank and may be: suspension of work, dismissal or legal proceedings in accordance with local labor regulations.

**Note:** Any situation not covered in this section of penalties will be handled in accordance with local labor regulations.

The penalty to be applied will depend on each case and will always be consulted with the Compliance and Legal Areas. These can range from a severe reprimand to termination. Likewise, civil and criminal actions could be taken and even the possibility of not receiving variable income (performance bonuses or others) if applicable.

The following are considered very serious offenses:

- ✓ Failure to comply with the anti-corruption laws and guidelines described in the Anti-Corruption Program may result in significant civil and criminal penalties for both the Bank and Employees, Directors, Stakeholders, or Third Parties involved (including substantial fines and imprisonment), and in significant reputational damage.
- ✓ Directors, Employees or Third Parties who become aware of potential non-compliance with the Anti-Corruption Program failing to report it through the Bank's formal communication channels. This act is not only considered a very serious offence, but will also be subject to disciplinary action.

### **Offenses and Penalties, cont.**

Any Director, Employee or Third Party shall be subject to disciplinary action if they engage in the following:

- Mislead or obstruct investigations into potential breaches of the Anti-Corruption Program.
- Retaliation in any form against those who provide information on acts that infringe this Code of Ethics and Conduct.
- Willful blindness, i.e., becoming aware of potential breaches of this Code of Ethics and Conduct and not reporting them through the available ethical channel.

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**Code:  
CUMP-MAN-001      Code of Ethics and Conduct**

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***What Prevails  
between this  
Code, Internal  
Policies and  
Applicable Laws?***

- The Code of Ethics and Conduct forms part of the Bank's regulatory framework, together with the Internal Labor Regulations, the Policy, Standards and Procedures Manuals and other Operating Instructions.
  - In case of doubt regarding the interpretation of the content of this Code or its respective application, or particularly regarding conflicts of interest, the Ethics and Conduct Committee should be consulted.
  - In the event of a conflict between the provisions of this Code and the applicable law, the applicable law shall prevail.
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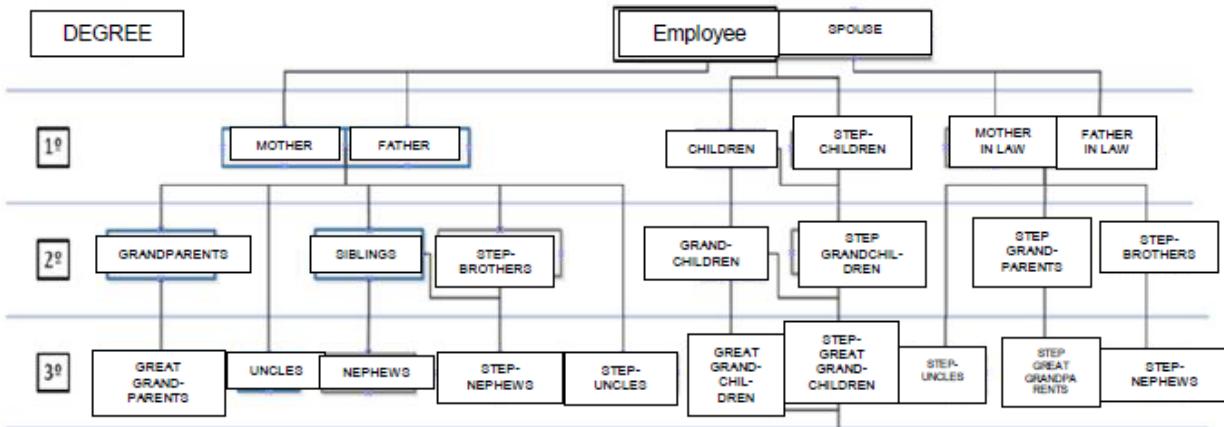
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## Annex 1



### Degrees of Consanguinity and Affinity



Descendants of Employee

Descendants of Employee and Spouse

Descendants of Spouse

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## ***Certificate of Understanding of the Code of Ethics and Conduct***

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I certify that I have read Inteligo Bank's Code of Ethics and Conduct and understand the standards of behavior that are expected while our relationship is maintained, as comprised of the Standards of Conduct, Conflict of Interest Policy, Confidentiality, Conduct Guidelines, and Price Manipulation.

It is understood that this Code provides for appropriate penalties in cases of non-compliance with established regulations.

I am also aware that there is an Ethical Channel managed by an independent company that handles complaints and investigations in accordance with the scaling-up protocol.

I accept and understand all the guidelines set forth in Inteligo Bank's Code of Ethics and Conduct and undertake to comply with them.

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**NAME**

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**PERSONAL ID CARD**

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**SIGNATURE**

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**DATE**

***Note: The Code of Ethics and Conduct applies to all directors, employees, clients, suppliers, business partners, and stakeholders.***

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