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

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**Objective**

The Bank's Code of Ethics and Conduct has the following objectives:

- To foster and promote our values and behaviors based on integrity, trust, respect, and worth of human beings in their privacy, individuality, and dignity.
- Our directors, employees and stakeholders must always act ethically, regardless of their position, geographical location or level of responsibility.
- To ensure that its business activities are conducted in accordance with legal standards applicable to the Bank.
- To maintain credibility, both institutional and individual, through high standards of ethical and professional behavior, in institutional operations and in generating business.
- Obtain results in an honest, fair, legal, and transparent manner.
- To strengthen the trust of our directors, employees, clients, suppliers and investors, maintaining an environment of transparency and responsibility.

**Scope**

This Code is mandatory for all directors, employees, suppliers, clients, business partners, and stakeholders of Inteligo Bank, in order to ensure and strengthen the image of a Bank that can be trusted for the soundness of its principles and values aligned with those of the economic group that comprise it.

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.

**Documents  
Related to  
External  
Standards**

**Central Bank of The Bahamas**

- Guidelines for Corporate Governance related to the Bank's processes, structure, information, and management.

**Bahamas Statute Law:**

- Data Protection (Privacy of Personal Information) Act, 2008 (LPD).

**Laws of the Republic of Panama**

- Law 23 of April 27, 2015 Preventing Money Laundering, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction
  - Banking Law of the Republic of Panama
  - Labor Code of the Republic of Panama
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<p><b>Documents Related to External Standards,</b> <i>Continued</i></p>	<p><b>Superintendency of Banks of Panama</b></p> <ul style="list-style-type: none"> <li>▪ Rule 1-2022, whereby special guidelines for the protection of personal data processed by banks are established.</li> <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>
<p><b>Corporate Documents Intercorp Financial Services</b></p>	<ul style="list-style-type: none"> <li>▪ Code of Ethics and Standards of Business Conduct</li> <li>▪ Corporate Governance Manual</li> <li>▪ Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) Manual</li> <li>▪ Corporate Policy on Personal Data Protection</li> </ul>
<p><b>Other Related Policies and Processes</b></p>	<p><b>Policies:</b></p> <ul style="list-style-type: none"> <li>▪ Corporate Governance</li> <li>▪ Information Asset Management</li> <li>▪ Management of Suppliers and Third Parties</li> <li>▪ Operational Risk Management</li> <li>▪ Facilities Security</li> <li>▪ Anti-Corruption and Bribery</li> <li>▪ Use of Confidential Information</li> <li>▪ Use of Mobile Devices</li> <li>▪ Use of email and internet</li> <li>▪ Information Systems Security</li> <li>▪ Password Management</li> <li>▪ Human Development and Management</li> <li>▪ Personal Data Protection</li> </ul> <p><b>Processes:</b></p> <ul style="list-style-type: none"> <li>▪ Ethical Complaint Channel Management</li> <li>▪ Complaint Reception and Investigation</li> <li>▪ Complaint Escalation Protocol</li> <li>▪ Complaint Resolution and Closure</li> <li>▪ Staff Selection</li> <li>▪ Staff Onboarding and Hiring</li> </ul> <p><b>Management of Prevention-AML/CFT Policies</b></p> <ul style="list-style-type: none"> <li>▪ Client Onboarding</li> <li>▪ Know Your Employee</li> <li>▪ Know Your Financial Intermediary</li> <li>▪ Ongoing Client Due Diligence</li> <li>▪ Tax Compliance for U.S. Clients Abroad</li> <li>▪ Client Compliance Risk Rating</li> </ul>

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**Other Related  
Policies and  
Processes, cont.**

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**Processes**

- Client Investigation
- Monitoring of Alerts
- Unusual Transaction Analysis
- Updating of Employee Data
- Financial Intermediary Due Diligence
- Bank and Account Opening Interm. Due Diligence
- Ongoing Client Due Diligence
- Enhanced Client Due Diligence

**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

**Definitions**

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- Willful Blindness: Seeing, hearing and/or becoming aware of inappropriate behavior (whether consciously or not) and deliberately ignoring it. This 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.
  - Appropriate Reporting Line: This refers to the upward reporting hierarchy.
  - Stakeholders: This refers to those parties that are related to, influence or may influence the foundation of the Bank.
  - 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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<b>Mission</b>	To advise our clients and their families in the management of their wealth throughout their lives.
<b>Corporate Values Guiding Our Management</b>	<ul style="list-style-type: none"><li>▪ <b>Client Focused:</b> We put our internal and external customers first, serving them with commitment and initiative.</li><li>▪ <b>Excellence:</b> We do things extraordinarily well by going beyond our limits, challenging ourselves to grow and learn.</li><li>▪ <b>Integrity:</b> We act with transparency, are guided by solid principles, and are fair and ethical.</li><li>▪ <b>Teamwork:</b> We give our best to achieve together the common goal that unites us.</li><li>▪ <b>Sense of Humor:</b> We enjoy what we do, transmit well-being to others, laughing at ourselves.</li><li>▪ <b>Innovation:</b> We explore, experiment and learn constantly to find new solutions that transform our company.</li></ul>
<b>Bank Secrecy</b>	<ul style="list-style-type: none"><li>▪ 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.</li></ul>
<hr/> <b>Our Principles</b> <hr/>	
<b>Loyalty</b>	<p>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.</p> <p>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.</p>
<b>Transparency</b>	<p>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.</p>

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**Our Principles, Cont.**

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**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.

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**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 stakeholders of Inteligo Bank 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, integrity 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**

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**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.

- 
- 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.
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**Our Commitment**

We promote fair, equitable and respectful treatment, maintaining an inclusive environment, free of discrimination, harassment, violence or any conduct that threatens the dignity and integrity of individuals.

To this end:

- 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 encourage honest communications between Bank members.
- We work as a team, valuing the different opinions and contributions of all.
- We respect the work environment, our directors, employees, suppliers, clients, users, as well as other stakeholders, and build relationships based on trust, maintaining a safe and inclusive environment, with respectful, fair, and dignified relationships among all to maximize their potential.
- We recognize and promote human and labor rights in line with international standards.

**Diversity, Equal  
Opportunities and  
Respect**

*What is forbidden?*

- To discriminate on the basis of race, ancestry, gender, age, religion, nationality, educational background, political affiliation, physical disability, marital status, sexual orientation, or any other characteristic.
- Engaging in aggressive and/or negative verbal or physical behavior aimed at intimidating, hurting, scaring, threatening, or intentionally excluding a person or stakeholder in particular.
- Carrying out hostile or offensive acts against a person in the workplace, by any means.
- Imposing and/or allowing any form of forced or compulsory labor, as well as child labor under laws or international conventions.
- Making sexual advances, sexually offensive acts and comments, sexist, indecent or obscene conversations, gestures or comments.
- Allowing or refraining from reporting any conduct that undermines the integrity of individuals.
- Becoming aware of and failing to immediately report any behavior that runs counter to our commitment to diversity, equal opportunity and respect.

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**Our Commitment**

***Sexual or Psychological Harassment***

- We practice zero tolerance for sexual or psychological harassment or acts of intimidation of any kind.
- We must show consideration and respect for others and abandon any attitude deemed offensive by another person at the first sign thereof.

***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.

***Social Responsibility***

- We comply with legal standards and the implementation of existing or recommended international best practices regarding social responsibility.

We develop business in a safe and healthy manner, taking care of our employees and other stakeholders.

To this end:

***Safe and Healthy Environment***

- 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/or report risks or accidents promptly to implement the necessary measures.

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**Our Commitment**

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**Safe and Healthy  
Environment,  
cont.**

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*What is forbidden?*

- Engaging in any behavior that puts at risk the safety and health of directors, employees, and third parties on the premises.
- Working under the influence of intoxicating substances or consuming alcoholic beverages during the hours assigned for the performance of their duties.
- Allowing or refraining from reporting any conduct that threatens the safe and healthy environment at the Bank.
- Becoming aware of and failing to immediately report any behavior of employees or third parties that threatens the safe and healthy environment for all.

**Handling  
Interpersonal  
Relationships at  
Work**

- 
- 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.
  - 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.
  - 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.
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## **Our Commitment**

### **Handling Interpersonal Relationships at Work, cont.**

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*Continued:*

- ✓ 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.

### **Employment Outside the Bank**

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- 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.
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**Our Commitment**

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**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.

**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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We prepare and provide financial information and operational reports in a transparent manner; therefore, our records accurately represent our business, accounting and financial situation.

**Integrity of  
Financial and Non-  
Financial Reports**

- To this end:
- We ensure the timely, complete, correct, and accurate recording of transactions and operations for the purpose of reporting appropriate information for decision making.
  - We keep accurate, timely, clear, and complete business, financial and non-financial data, records, agreements, transactions, operations, and reports.
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**Our Commitment**

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***Integrity of  
Financial Reports  
and Non-Financial  
Reports, Cont.***

To this end, *Cont.:*

- We record financial information fully and transparently, complying with the rules, accounting practices and standards applicable to the Bank.
- 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 and non-financial reports.
  - Voluntarily providing or recording false or misleading accounting or auditing data.
  - Allowing or refraining from reporting, any conduct that undermines the integrity and transparency of information.
  - Becoming aware of and failing to report any manipulation or concealment of financial information and/or operational reports.
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We protect the confidential information of our Bank, directors, employees, clients, suppliers, and other stakeholders.

To this end:

***Protection of Data  
and Information  
and Intellectual  
Property***

- 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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**Our Commitment**

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**Protection of Data  
and Information  
and Intellectual  
Property, Cont.**

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*What is forbidden?*

- Using, appropriating or improperly disclosing confidential, restricted or insider information without authorization, including personal data of clients, directors, employees, and other stakeholders, as well as information protected by specific laws and regulations applicable to the financial industry and/or securities market, and in accordance with internal policies.
  - Disclosing 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 or sharing keys or passwords that have been provided personally for performing functions.
  - Deliberately, negligently or carelessly failing to comply with guidelines on information security, protection of personal data and insider information policies issued in the Bank.
  - Concealing or failing to report any misuse or violation of classified information and intellectual property.
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A conflict of interest arises when personal activities or relationships are incompatible or collide with the objective performance of our duties as employees and/or the interests of the Bank.

To this end:

**Conflict of Interest**

- We avoid situations where our personal relationships or interests may unduly influence the performance of our responsibilities, our business relationships with suppliers, clients or other stakeholders or our work decisions.
  - We select employees, suppliers and other stakeholders based on their knowledge, experience, merit, reputation, technical and service quality.
  - 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.
  - 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.
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***Our Commitment***

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To this end, *Cont.*:

- We reject giving gifts or hospitality when they are intended to influence objective decision-making. The Bank has a procedure that regulates the giving and receiving of gifts and hospitality.
- We refrain from making decisions related to the Bank if we have a family or friendly relationship with an employee, supplier, shareholder, client, or other stakeholder.
- We seek approval from our leaders before accepting a proposal to provide professional services to a public or private entity.
- We report any irregular behavior that may be detrimental to the Bank's interests and reputation; to this effect, we implement guidelines for the attention, hiring or selection of family members and friends.
- We maintain good credit and financial behavior.

*What is forbidden?*

***Conflict of Interest, Cont.***

- 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 close persons that influence objective decision-making.
  - Maintaining sentimental relationships with employees, directors or suppliers and other stakeholders 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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***Our Commitment***

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We take care of the Bank's reputation, respecting its values and principles at all times, behaving appropriately in work, social and family environments.

To this end:

- We protect and strengthen the Bank's image, reputation, assets, and culture of integrity and require stakeholders to 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.
- We respect the right of our employees to participate, on a personal basis, in activities of diverse religious, educational and political organizations, among others.
- No individual political effort will be compensated or reimbursed by the Bank.
- 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.

***Responsible  
Representation of  
the Bank and  
Protection of  
Reputation***

***What is forbidden?***

- Engaging in behavior or disseminating statements through physical or digital media, including social networks, that harm 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, religious, sports or social nature.
  - Concealing or failing to report conduct that may affect our reputation.
  - Using the Bank's or the Group's brand in any meeting, press release, news item, or article related to political activities.
  - Becoming aware of and failing to report any action that jeopardizes the Bank's reputation.
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**Our Commitment**

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We design all our products and services in compliance with applicable internal and external standards.

To this end:

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

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

*What is forbidden?*

- Deliberately or negligently failing to comply with internal policies and guidelines, as well as any legislation applicable to the jurisdictions where the Bank operates.
  - Suggesting to a client, employee, supplier, or other stakeholders to infringe the law and/or internal rules of the Bank.
  - Disclosing any internal investigation related or linked to a client, employee, supplier, or other stakeholders with these activities.
  - Becoming aware and failing to immediately report any indication or incident involving non-compliance with regulations applicable to the Bank.
  - Becoming aware of and failing to report acts of non-compliance with external and internal regulations applicable to the Bank.
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**Our Commitment**

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

- 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.

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We are committed to maintaining honest and transparent relationships with private and public officials.

To this end:

- We ensure compliance with anti-corruption laws and the Bank's policies and guidelines aimed at preventing any act of corruption.
- We comply with the guidelines and processes set out in our Anti-Corruption Policy to prevent any act of fraud, bribery and/or corruption.
- We monitor and implement precise guidelines for the relationship of our clients and representatives with public officials.

**Prevention of  
Corruption**

*What is forbidden?*

- Offering, giving, soliciting, or accepting any kind of reward, benefit or inducement, as well as any contribution, donation or sponsorship in a personal capacity, from the Bank, for a public or private official to act improperly or grant an improper advantage.
- Deliberately or negligently failing to comply with the policies and guidelines issued by the Bank to prevent acts of corruption.
- Becoming aware of and failing to report any indication of corruption.

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

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**Our Commitment**

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We establish transparent and ethical relations with authorities and public officials.

To this end:

- 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 interact with government officials on behalf of the Bank, subject to authorization from the appropriate authorities.
- We conduct our operations with integrity, impartiality and free from political influence.
- We do not make donations or contributions to candidates or political parties with Bank resources. If an employee makes political donations or contributions, they must not be made under any circumstances using the name of Inteligo Bank.

**Relationship with  
Public Officials**

*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.
- Becoming aware of and failing to report any misconduct with public officials.

**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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***Our Commitment***

We conduct our business based on free and fair competition, promoting innovation and continuously improving our products and services.

To this end:

- We refrain from making comments that may affect the image of competitors, refer to competitors or their brands in a negative or derogatory manner or continue to spread rumors about them. Other financial institutions receive the same treatment the Bank expects receive.
- We develop our business, pricing and commercial aspects independently of our competitors.
- We compete in a fair and honest manner, based on our ethical principles and in full compliance with the legal standards that regulate free competition.

***Relationship with  
Our Competitors***

*What is forbidden?*

- 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.

We are convinced that we will achieve our purpose, mission and vision by acting with honesty in any situation that may arise.

To this end:

- 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.

***Commitment to  
Honesty***

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**Our Commitment**

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To this end, *Cont.*:

- Non-public information obtained from clients or future clients, in accordance with the above, will be treated as confidential information.
- We reject any dishonest act such as fraud, theft, misappropriation, or misuse of resources of the Bank, clients and/or the public in general.
- We act with integrity and transparency in decision-making.

*What is forbidden?*

*Commitment to  
Honesty, Cont.*

- Concealing information, committing fraud, falsification, providing false information, generating or taking advantage of errors or omissions in procedures, systems or virtual media to obtain own benefits or for third parties.
- Using ambiguous or misleading terms or explanations, as well as concealing information relevant to making informed decisions.
- Stealing, taking money or goods from the Bank, clients, employees, suppliers, and other stakeholders.
- Improperly using assets assigned by the Bank for personal use or for third parties or for purposes unrelated to their work.
- Inciting others to perform dishonest or fraudulent acts.
- Making and failing to report any dishonest act.

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

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**Ethical Guidelines**

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All directors, employees and stakeholders are responsible for:

- Knowing and understanding the conditions set forth in the Code of Ethics and Conduct.
- Complying with ethical principles at all times, 24 hours a day, 7 days a week.

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

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.

**Offenses and Penalties**

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.

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**Code:**  
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**Ethical Guidelines**

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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.

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

**Offenses and Penalties, cont.**

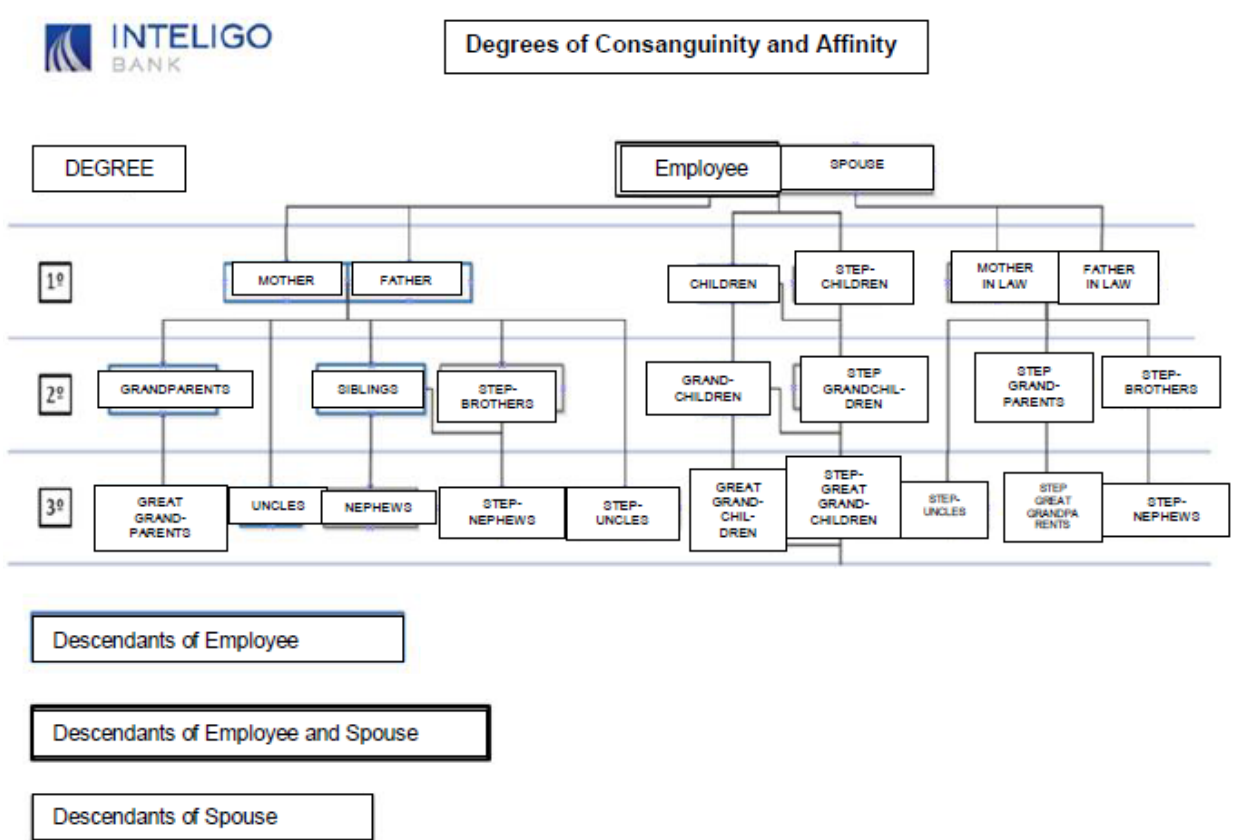
- Mislead or obstruct investigations into potential breaches of the Anti-Corruption Program.
- Retaliation in any form against those who provide information on acts that infringe this Code of Ethics and Conduct.
- Willful blindness, i.e., becoming aware of potential breaches of this Code of Ethics and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

**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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**Annex 1**



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**INTELIGO**

***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.

\_\_\_\_\_  
**NAME**

\_\_\_\_\_  
**PERSONAL ID CARD**

\_\_\_\_\_  
**SIGNATURE**

\_\_\_\_\_  
**DATE**

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

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