

30 May 2026

Anti-Bribery

Anti-Bribery & Corruption Policy

Reference: Bribery Act 2010

Version 1.0 - last revised 25 May 2026

Credicorp Limited has a zero-tolerance position on bribery and corruption, in any form, anywhere we operate. This policy implements the requirements of the Bribery Act 2010 (UK) and applies to every colleague, contractor, broker, supplier and anyone acting on our behalf.

1. What counts as a bribe

A bribe is offering, giving, requesting or receiving any financial or other advantage with the intent of improperly influencing a decision. It does not matter whether the bribe is offered directly or through a third party, and it does not matter whether the bribe is accepted - offering it is the offence.

The Bribery Act 2010 creates four offences: bribing another person, being bribed, bribing a foreign public official, and the corporate offence of failing to prevent bribery by a person associated with the company.

2. Gifts and hospitality

Modest hospitality offered or received in the normal course of business is allowed, subject to a written record and to the following limits:

- Any single gift or hospitality given or received must not exceed £50 in value.
- Cash and cash equivalents (gift cards, prepaid cards, vouchers) are never acceptable - give or receive.
- Gifts and hospitality offered or received in connection with a tender, decision or favourable treatment are never acceptable, regardless of value.
- Any gift or hospitality must be transparent - capable of being declared without embarrassment.

Anything outside these limits must be pre-approved by the Compliance Officer and entered in the

central gifts and hospitality register.

3. Facilitation payments

Facilitation payments - small bribes to speed up a routine action - are bribes. They are not acceptable from any colleague, contractor or third party acting on our behalf, regardless of local custom.

4. Brokers and third parties

The corporate offence under the Bribery Act 2010 holds the company responsible for bribery by a person associated with it (a broker, supplier or agent) unless the company can show it had "adequate procedures" in place. Our adequate procedures include: due diligence on brokers and material suppliers, a contractual anti-bribery clause, training, the gifts and hospitality register, and active monitoring.

5. Reporting concerns

If you suspect bribery or corruption involving Credicorp or anyone acting on our behalf, report it through the routes in our Whistleblowing Policy, or email compliance@credicorp.co.uk directly. PIDA protection applies.

This policy was last reviewed in May 2026.

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