

30 May 2026

Anti-financial-crime policy

Reference: POL/AFC/2026.1

Version 1.0 - last revised 25 May 2026

What this policy covers

Credicorp Limited has a zero-tolerance stance on financial crime. This policy is a plain-English account of the controls we run against bribery, money laundering, terrorist financing, sanctions breaches and fraud. It applies to every Credicorp employee, contractor and broker, and to every customer relationship.

Bribery Act 2010

We do not give or accept gifts, hospitality, fees or any other inducement intended to influence a lending decision, a supplier choice, or a regulatory interaction. Our staff are required to refuse any offer that could appear improper and to escalate via the compliance route. We carry out periodic reviews of supplier relationships against this standard.

Money Laundering Regulations 2017

Every customer goes through identity verification (the director) and entity verification (the company) before a loan is drawn. We screen all parties against UK and international sanctions lists, politically-exposed-person (PEP) lists and adverse-media sources. Where a flag is raised, the relationship is paused and reviewed by the Money Laundering Reporting Officer (MLRO).

Sanctions screening

We screen against the UK Office of Financial Sanctions Implementation (OFSI) consolidated list, the EU consolidated list, and the US OFAC SDN list. A confirmed match results in immediate suspension of the application or facility and a report to the relevant authority within the regulatory timeframe.

Politically exposed persons

Where a director is identified as a politically-exposed person, the application is escalated to enhanced due diligence: senior-management approval, confirmation of the source of company funds, and ongoing monitoring of the facility.

Reporting

Staff are trained to recognise suspicious activity indicators (unusual transaction patterns, reluctance to provide documentation, repeated changes to beneficial ownership, etc.) and to escalate to the MLRO without alerting the customer. The MLRO is empowered to file a Suspicious Activity Report (SAR) with the National Crime Agency where the legal threshold is met.

Customer cooperation

If we ask for additional documentation or for an explanation of an unusual transaction, we are doing so to meet our regulatory obligations, not because we suspect any particular customer of wrongdoing. We aim to be quick about it and to explain what we need and why.

Reporting concerns to us

If you suspect financial crime in or around a Credicorp account or transaction, please tell us. Email financial-crime@credicorp.co.uk, or follow our security disclosure guidance for technical / cyber issues. We treat reports confidentially.
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