

30 May 2026

Conflicts of Interest

Conflicts of Interest Policy

Reference: FCA SYSC 10 (applied voluntarily) · Companies Act 2006 s.175

Version 1.0 - last revised 25 May 2026

Credicorp Limited maintains a conflicts of interest framework so that a borrower can be confident our decisions are made on the merits and not skewed by any undisclosed interest of the firm or its people. This policy aligns voluntarily with FCA SYSC 10 (the FCA's conflicts-of-interest rule for authorised firms) and with the directors' statutory duty under section 175 of the Companies Act 2006.

1. Types of conflict

- Firm-versus-customer: a transaction or product feature that benefits Credicorp at a borrower's expense.
- Customer-versus-customer: a situation where one borrower's interest is advanced at another's expense (e.g. allocation of a limited offer).
- Personal: a colleague (or a connected person) has a financial or non-financial interest in the outcome of a decision they are taking.
- Related-party: a transaction or arrangement with a person connected to Credicorp's directors, shareholders or group companies - including transactions with our group company CM Beyer Limited.

2. Identification

Every colleague is asked at induction, annually thereafter and on any material life change, to declare interests that could create a conflict: directorships, significant shareholdings, family relationships with brokers / suppliers / borrowers, and any side business in the same sector. Declarations are recorded centrally.

3. Management

Where a conflict is identified, the firm applies the least-intrusive mitigation that will eliminate the risk:

- Disclose to the affected customer and obtain explicit acknowledgement before proceeding.
- Reassign the decision to a colleague with no conflict.
- Use independent third-party pricing where the firm's judgement could be skewed.
- Decline the business entirely.

4. Group-company dealings

Credicorp's servicing agent CM Beyer Limited is a related company. The arm's-length terms of the servicing relationship, the segregation of customer data, and the absence of cross-selling between the two firms are reviewed annually. Disclosure of the relationship is made on every customer-facing surface that mentions either firm.

5. Customer disclosure

Where a conflict affects a specific borrower, we disclose it in writing and ask the borrower whether they wish to proceed. The disclosure includes: what the conflict is, who it benefits, how it is being managed, and the borrower's right to decline or to take independent advice.

6. Reporting concerns

If you believe a Credicorp decision was influenced by an undisclosed conflict, report it via the routes in our Whistleblowing Policy or directly to compliance@credicorp.co.uk.

This policy was last reviewed in May 2026.

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