CORPORATE ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Intercorp Retail

InRetail Perú adopted Intercorp Retail's Corporate Anti-Bribery and Anti-Corruption Policy

Modifications approved at Board of Director's Meeting of June 26th, 2025

1. OBJECTIVE

The purpose of this policy is to prevent the direct or indirect involvement or participation of the Business Units (BUs), their shareholders, investors, affiliates, directors, managers, employees, advisors, legal representatives, suppliers, and customers in any act of corruption, money laundering, or financing of terrorism, as well as other acts in alignment with local regulations (Law 30424, its regulations, the Criminal Code, among others), the culture of Integrity and Compliance, and international anti-corruption standards (ISO 37001).

2. SCOPE

This policy applies to all employees of each of the Corporate Units (UC) and all the Business Units (UNs) that currently make up and will in the future make up Intercorp Retail and InRetail Perú Corp, as well as their business partners and suppliers.

The CUs and BUs may establish complementary rules and guidelines that reinforce the prevention measures or increase the security levels outlined in this policy.

3. REGULATORY FRAMEWORK / RELATED DOCUMENTS

ENTITY	DOCUMENT
ISO - *International Organization for Standardization*	ISO 31000 – Risk Management ISO 37001 – Anti-Bribery Management Systems ISO 19600 – Compliance Management Systems
Inacal	NTP ISO 31000 – Risk Management NTP ISO 37001 – Anti-Bribery Management Systems
Intercorp Retail	Internal Procedures Organization and Functions Manual Code of Ethics Corporate Risk Assessment Methodology
Laws, Standards, and Regulations[1]	Law No. 27693, its amendments, regulations, and complementary provisions. Law No. 30424, its amendments (Legislative Decree No. 1352 and Law No. 30835), and its regulations. Law No. 30737 – Law that ensures the immediate payment of civil reparations in favor of the Peruvian State in cases of corruption and related crimes. Legislative Decree No. 1385 – Legislative Decree that penalizes corruption in the private sector.
Superintendencia del Mercado de Valores	Resolución S.M.V. N° 037-2015-SMV/01 - Reglamento de Gestión Integral de Riesgos Reglamento del Modelo de Prevención

[1] For the subsidiaries of Quicorp S.A. located in countries other than Peru, compliance with this document as a Corporate Matrix Policy is required, without the need to comply with the laws, standards, and regulations of the Peruvian State.

ENTITY	DOCUMENT
Superintendency of Banking, Insurance and Pension Fund Administrators	Circular G-139-2009 – Business Continuity Management Circular G-140-2009 – Information Security Management
	SBS Resolution No. 272-2017 – Regulation on Corporate Governance and Comprehensive Risk Management

4. DEFINITIONS

4.1. **Corruption:** An activity that involves paying or offering money or other goods, directly or indirectly, to a public or private official in order for that person or a third party to act—or refrain from acting—in a way they are obligated to. Corruption also includes receiving or accepting payments in exchange for acting or failing to act as required.

4.2. **Money Laundering:** An activity that involves concealing the illicit origin of money, assets, effects, or profits derived from other crimes such as corruption, drug trafficking, tax evasion, etc., usually through multiple transactions carried out by one or more individuals or legal entities.

4.3. **Terrorism Financing:** An activity that involves providing, directly or indirectly, any type of resources—whether of lawful or unlawful origin—that enable or facilitate the commission of terrorist acts or the formation of terrorist groups.

5. RESPONSIBILITIES

5.1. The Board of Directors of Intercorp Retail is responsible for:

- Overseeing the implementation of the provisions set forth in this Policy and the overall Prevention Model.
- Defining and approving this prevention policy, which guides the management of the risks the organization faces.
- Reviewing and taking note of the reports and recommendations issued by the prevention officer or compliance officer.

5.2. The General Manager of Intercorp Retail is responsible for overseeing the implementation of the provisions set forth in this Policy and the overall Prevention Model.

- Promoting a risk culture within the organization, ensuring an appropriate framework for risk management.
- Implementing the general policies and processes established by the Board of Directors and the Ethics Committee, promoting a culture of prevention and comprehensive risk management within the organization.
- Ensuring compliance with the risk exposure levels approved in the risk appetite and tolerance policy.

5.3. The Ethics Committee is responsible for:

- Reviewing reports and/or offenses related to events involving corruption, money laundering, and terrorism financing, and ordering the corresponding investigations.
- Assessing and determining the appropriate sanctions for violations committed by the Companies' employees.
- Ordering the application of sanctions and corrective measures when applicable.
- Proposing continuous improvements and adjustments to the Prevention Model.

5.4. The Prevention Officer (Anti-Bribery Compliance Officer) is responsible for:

- Ensuring that the Prevention Model complies with the applicable legal requirements and guidelines (Law No. 30424, its amendments and regulations, Legislative Decree No. 1385).
- Overseeing the implementation of this Policy and the Prevention Model in general.
- Managing the operation, functionality, effectiveness, and continuous improvement of the Prevention Model.
- Supervising the implementation of controls within the framework of the Prevention Model.
- Participating in the organization’s strategic planning and in the risk assessment related to matters of the Prevention Model.
- Coordinating internal and external communication activities related to the Prevention Model.
- Coordinating training and awareness activities regarding the Prevention Model.
- Receiving and analyzing reports related to potential situations of corruption (public and private), money laundering, and terrorism financing; and reporting the results to the Ethics Committee.
- Providing guidance to staff regarding the Prevention Model.
- Generating periodic reports on the performance of the Prevention Model and submitting them to the Board of Directors and General Management.
- Proposing policies, strategies, and measures to strengthen the Company’s Ethical Culture and Compliance.
- Coordinating with the Human Resources department to ensure that employee performance evaluations include compliance-related aspects.
- Proposing response measures to irregular events detected within the Company and ensuring their follow-up.
- Performing other tasks related to Risk Management practices and standards, as assigned by the Board of Directors, the Ethics Committee, or General Management.
- Overseeing the implementation of crime prevention and compliance policies in the Company, its affiliates, and subsidiaries.
- Reporting periodically to the Board of Directors on the risk management efforts.
- Approving and prioritizing action plans to mitigate risks or events as needed.
- Monitoring the progress of self-assessments, reports, mitigation measures, and risk treatments.
- Reporting materialized losses/contingencies, business continuity plans, and information security incidents to the Board of Directors.

5.5. The Internal Audit area, or the area assuming its functions, is responsible for:

- Evaluating the internal control structure necessary to support the Prevention Model.
- Assessing the efficiency and effectiveness of the control environment through monitoring of the program and testing of key anti-bribery, anti-money laundering, and counter-terrorism financing controls.
- Auditing compliance with the Prevention Model and reporting its findings to the appropriate governing body.

5.6. The Vice Presidency of Human Development Management is responsible for:

- Leading training programs and the dissemination of the measures suggested by the Ethics Committee to all Company Employees.
- Assessing and implementing, when applicable, the sanctions proposed by the Compliance Officer.

5.7. All employees of the Business Units (BUs) and Corporate Units (CUs) of Intercorp Retail are responsible for complying with and enforcing this policy.

6. Policy Guidelines

Guiding Principles

6.1. Principles of the Prevention Model

These principles guide the design, approval, implementation, monitoring, and continuous improvement of the model:

Accessibility Principle: The policies, actions, procedures, and strategies that make up the model, as well as supporting materials, must be easily accessible and written in clear and understandable language for workers, business partners, and, when applicable, other stakeholders.

Adaptability Principle: The policies, actions, procedures, and strategies that comprise the prevention model must be tailored to the nature, needs, size, structure, operations, and business model of the organization.

Continuity Principle: The model is a continuous process, permanently adapting to changes in the company and business environment.

Traceability Principle: It documents the processes, controls, risk evaluations, and the results of such evaluations, as well as all elements that demonstrate the proper functioning of the prevention model.

Continuous Self-Assessment Principle: This involves the ongoing identification, assessment, and monitoring of risk-prone activities, including those that may increase or generate new risks, understanding their consequences, and evaluating the existence of factors that may prevent or mitigate risk occurrence—based on the established methodology.

Proportionality Principle: The controls implemented by the company are proportional to the level of risk, the likelihood of events occurring, and their potential impacts.

Ongoing Communication Principle: Regardless of their size or capacity, companies must inform their employees—and, when applicable, their business partners and stakeholders—about their programs, policies, and practices to prevent criminal conduct. This does not imply the obligation to disclose information that may compromise the interests of the Group or its subsidiaries.

Mandatory Compliance Principle: All rules, provisions, principles, and guidelines contained in current legislation on corruption, money laundering, and terrorism financing—as well as those in the Prevention Model and this policy—are mandatory and must be strictly followed by all employees. Any conduct contrary to them is strictly prohibited.

Immediate Rejection Principle: Any request or offer of payment in exchange for an act or omission that contravenes the rules, provisions, principles, and guidelines contained in applicable anti-corruption, anti-money laundering, and anti-terrorism laws, the Prevention Model, or this policy, must be rejected immediately, without hesitation or delay, and without generating any expectation on the part of the proposer.

Abstention in Case of Doubt Principle: If there is any doubt about whether a specific action or omission may violate anti-corruption, anti-money laundering, or anti-terrorism laws, the Prevention Model, or this policy, employees must refrain from acting and seek guidance through the appropriate ethics channels.

Constant Collaboration Principle: Employees must always collaborate in efforts to comply with and enforce the applicable laws, provisions, principles, and guidelines on corruption, money laundering, terrorism financing, the Prevention Model, and this policy; as well as in any investigations or proceedings led by authorities, the Compliance Officer, or the Ethics Committee.

Transparency Principle: Employees must always act—whether in the workplace or in their private lives—in accordance with the applicable laws, provisions, principles, and guidelines on corruption, money laundering, terrorism financing, the Prevention Model, and this policy, as if they were constantly being observed by the Ethics Committee or relevant authorities.

General Guidelines

6.2. Corruption, money laundering, and terrorist financing are crimes and will be reported and prosecuted by the Business Units (BUs)/Corporate Units (CUs). Any act related to these crimes is considered a serious offense and grounds for dismissal.

6.3. All Employees have the duty to act in accordance with the guiding principles contained herein and with respect for the values of the Companies; and have the obligation to comply with and ensure compliance with this policy and the Prevention Model.

6.4. The end does not justify the means; therefore, no sales, expansion, or efficiency goals justify exceptions to this rule.

6.5. Employees have the duty to facilitate compliance with the policy and any investigations carried out to detect violations of the rules.

6.6. All employees are expected to safeguard the good reputation of the Companies and their own. Any act that harms an employee's personal reputation due to involvement in corruption, money laundering, or terrorist financing will also damage the Companies' reputation and will not be tolerated.

6.7. No one is required to follow orders or instructions from supervisors, assistant managers, managers, or directors that violate these rules. Any violation of this principle must be reported.

Specific Guidelines

6.8. **Giving and Receiving Gifts or Courtesies:**

It is prohibited to make any payment or promise, or to provide any benefit, to any official, whether public or private, in order to facilitate or expedite procedures, processes, or activities that circumvent regular procedures.

6.8.1. The improper omission of requirements in administrative procedures, the obtaining of documents through irregular means, and/or any other form of bypassing formal administrative or judicial channels carried out with public officials by collaborators of the Business Units (BUs) or Corporate Units (CUs).

6.8.2. The granting of gifts to public officials is strictly prohibited.

6.8.3. The Business Units (UNs) and Corporate Units (UCs) are committed to the responsible and appropriate use of facilities assigned for travel and representation expenses. These may not be used to cover representation expenses of public officials and must always be transparent and reasonable in light of the circumstances. Under no circumstances may they be used as a means to commit an act of corruption.

6.8.4. The Companies and their employees are prohibited from giving or receiving travel tickets, per diems, or reimbursements for accommodation expenses to or from any public official or any supplier, except for the exceptions established in this Policy. Policies approved for this purpose must be followed, and they shall aim to safeguard the independence of the employees in their decision-making, avoiding any commitments or sense of reciprocity that may affect their judgment or loyalty to the interests they serve.

6.8.5. No employee of the Companies may accept a travel invitation from a third party unless it falls under one of the scenarios set forth in section 6.8.6 below, and has the authorization of the Business Unit area Director or, in the case of a Corporate Unit, the Vice President of the area.

6.8.6. Invitations from third parties shall only be justified in the following cases:

- Travel for the selection of new products and understanding of their market.
- When there is a concrete opportunity to access new technologies, processes, or working methods and to observe them in practice, which can later be transferred to our organization.
- When there is a commercial or quality discrepancy that cannot be resolved without first verifying the conditions at the origin.
- When the objectives of the trip effectively contribute to achieving the organization's goals through clear and transparent agreements (e.g., increasing sales or improving EBITDA).

6.8.7. It is prohibited to request or suggest the giving of gifts or courtesies, for oneself or third parties, whether in the form of money or any other means.

6.8.8. No employee may receive gifts or courtesies from suppliers of any kind. Any gift must be sent to the Human Development area (GDH) of the corresponding Business Unit (UN) or Corporate Unit (UC). Commercial or promotional activations with business purposes are excluded from this prohibition.

6.8.9. All received gifts shall be delivered to the designated recipient, who will be responsible for ensuring compliance with the policy.

6.9. **Giving and Receiving Donations to Public Entities:**

The Business Units (UNs) and Corporate Units (UCs) may make donations under the following conditions, provided they align with objectives related to social responsibility, sustainability, or reputation:

6.9.1. Monetary Donations: Any monetary donation must be approved by a Resolution issued by the Head of the Entity or by Council Agreement in the case of Regional Governments, and by Municipal Council Agreement in the case of Local Governments, clearly stating the donor source and the destination of these public funds.

6.9.2. Non-Monetary Donations: Any donation of movable property must be approved by a Resolution of the Entity, accepting the donation and registering the asset in the entity's patrimonial and accounting records.

6.9.3. Understanding that donations can be used as instruments to facilitate improper payments to officials, the following guidelines must be considered in order to prevent them from being used for purposes other than those established:

- Any donation request must be previously approved by the Ethics Committee and the General Manager of the respective Business Unit (UN) or Corporate Unit (UC).

6.10. **Relationship with Public Officials:**

6.10.1. The Business Units (UNs) and Corporate Units (UCs) acknowledge that their employees may maintain good relationships with public officials, provided these relationships are marked by collaboration and do not infringe upon the principles established in this Policy or violate legal regulations. Such relationships must be free from any form of pressure or undue influence.

6.10.2. The corruption of public officials is strictly unacceptable to the Companies. It is illegal, always contrary to our standards of conduct and business practices.

6.10.3. Employees must inform their direct supervisor, their area director or manager, and the Human Resources department of any familial relationship they may have with public officials that could represent a conflict of interest. For this purpose, they must use the conflict-of-interest disclosure form established in the Code of Conduct. In cases where employees attend a meeting with a public official due to personal or external reasons unrelated to the Company, no conversation should involve seeking any undue benefit.

6.10.4. Payments to public offices, agencies, institutions, or entities, for any reason, must always be made directly to the name of the Entity, not to third parties. The reasons for the payments must always be recorded in the corresponding Unified Administrative Procedure Texts (TUPAs) or in a resolution that authorizes the entity to issue the charge and receive the payment.

6.10.5. The department responsible for making the payment must keep all supporting documents or receipts on file.

6.10.6. All communications with public officials must be carried out through formal channels or means, in order to allow for proper documentation of commitments, established deadlines, or the provision of information. In such cases, the communications must be supported or formalized using any method that provides evidence thereof.

6.10.7. Formal meetings with public officials, as part of interactions such as contract execution, regulatory matters, supervision, etc., should preferably be held at the facilities of the UN/UC or, alternatively, at the public entity's offices, whenever possible.

6.10.8. It is recommended that public inspections conducted by government entities be attended by at least two (2) UN/UC representatives.

6.10.9. The UNs/UCs strictly prohibit their employees, suppliers, or anyone acting on their behalf from engaging in the following activities during interactions with Public Officials:

- Accepting offers from or giving to public officials: gifts, cash or cash equivalents, loans, invitations, preferential treatment in any administrative procedure, advantages in selection processes, and generally any item (material or immaterial) that may result in an economic or other benefit for the Companies.
- Attempting to induce a public official to neglect their duties, make decisions that go against current procedures or regulations, or engage in any other illegal or unethical act.
- Making payments to any individual or legal entity when it is known or there is reason to suspect that all or part of the payment may be channeled to a public official.

- Inducing, assisting, or allowing someone else to violate these rules.
- Making direct or indirect donations to a public official.
- Exercising undue influence over a public official with the intention of obtaining a favorable resolution for the interests of the Companies.
- All prohibitions extend to the relatives of public officials, provided that such relationship is previously known.
- Making invitations, promotional events, seminars, trainings, trips, sports or entertainment events, or any kind of invitation to a public official from entities with the aim of gaining an undue advantage for the direct or indirect benefit of the Companies.
- Meeting with a Public Official of an Entity in which the Company is participating in a bidding or selection process, except as established in section 5.9.6.

6.11. **Financing of Political Activities**

The UNs/UC shall not make direct or indirect political contributions, and no employee or third party acting directly or indirectly on behalf of the UNs/UC may make contributions in their name for any type of political campaigning activity.

6.12. **Selection and Contracting of Suppliers**

6.12.1. Any person providing services or supplying goods to the BUs/UCs must comply with regulations aimed at preventing corruption, money laundering, and the financing of terrorism in all their business activities.

6.12.2. The BUs/UCs will refrain from contracting with suppliers or third parties whose reputations are under scrutiny due to actions related to corruption, money laundering, or financing of terrorism, or who, for any reason, refuse to adhere to the rules and procedures that will be applicable to all suppliers and third parties.

6.12.3. It is the duty of any employee interacting with these suppliers to act with due diligence in order to avoid the risk of corruption in their dealings on behalf of the Companies with public officials.

6.12.4. The Companies will contract suppliers only when there is a legitimate need for the goods or services they provide. In addition, all contracts must be executed through fair and formal processes, which must include written anti-corruption clauses (e.g., contracts, service orders).

6.12.5. Employees must remain alert to timely identify red flags related to corruption, money laundering, or financing of terrorism that may involve suppliers of the BUs/UCs.

6.12.6. The areas responsible for hiring third-party intermediaries, agents, or suppliers who act on behalf of the BUs/UCs must carry out due diligence procedures to reduce the risk that such third parties may make, offer, or promise improper payments to public officials. These procedures include:

- Verifying all fees and expenses invoiced by "sensitive" third parties, in order to confirm that they represent appropriate and justifiable compensation for the legitimate services provided.
- Identifying possible irregularities in the execution of services or contracts, such as the unexpected acceleration of processes or procedures when longer timelines were expected, or unexpected outcomes of a process or procedure when the success of the management was doubtful.
- Avoiding payments to any person when it is known, or there is reason to suspect, that all or part of the payment may be funneled to a public official.

6.13. **Conflict of Interest**

Employees must avoid exposing themselves to situations that compromise or could compromise their independence and objectivity, especially due to conflicts of interest.

For this reason, they must keep the BUs/BCs permanently informed about situations that could potentially create conflicts of interest, using the forms approved for this purpose.

6.14. **Confidentiality and Information Privacy**

All employees must maintain absolute confidentiality and discretion regarding information related to the UNs/UC, and must avoid disclosing any information that could unduly benefit themselves or third parties.

6.15. **Books and Accounting Records**

6.15.1. The UNs/UC are committed to developing, documenting, preserving, and continuously improving their internal financial controls to ensure that all payments are accurately recorded in the Company's books and accounting records. All payments must be recorded correctly and transparently. In this regard, all records must be supported by appropriate documentation such as receipts, orders, or other applicable documents.

6.15.2. Recording or authorizing the recording of false or misleading entries in the UNs/UC's books or accounting records with the purpose of concealing improper payments (e.g., disguising a bribe as part of the fees paid to a service provider) is strictly prohibited and will be considered a serious offense that constitutes grounds for dismissal.

6.15.3. The UNs/UC, according to their size, operations, internal complexity, and in proportion to the risks they face, must establish a control system that provides reasonable assurance that assets are being used for authorized and legitimate purposes and that transactions are properly recorded in the financial statements.

Reporting of Irregularities

6.16. The UNs/UC will ensure that the necessary reporting channels remain active to allow Collaborators to report any irregularities to the Compliance Officer or the Ethics Committee.

These reports may involve violations or breaches of the laws, the Prevention Model, or the guidelines, principles, and provisions established in this policy.

6.17. The UNs/UC will maintain adequate procedures to ensure that all received reports are properly addressed and that a response is provided to the whistleblower, based on the investigations carried out, when deemed appropriate.

6.18. Anonymous reporting will be allowed and encouraged, and the disclosure of practices contrary to the interests of the UNs/UC and the country will be promoted. Appropriate confidentiality and privacy mechanisms will be used to protect the rights and identity of whistleblowers.

6.19. No form of retaliation will be permitted against any person who reports or informs the UNs/UC of actions or omissions that violate the laws, the Prevention Model, or the guidelines, principles, and provisions of this policy.

7. ANNEXES

Annex A: Sworn Statement of Conflict of Interest

Annex A

SWORN STATEMENT OF CONFLICT OF INTEREST

The undersigned works at [insert corporate name] (hereinafter, the **"COMPANY")** and declares under oath (by marking with an "x" where applicable) that:

☐ Does NOT have any family, affinity, or friendship ties with individuals who may affect or could reasonably affect their objectivity and independence in the performance of their duties or in decision-making on behalf of and for the COMPANY.

☐ DOES have family, affinity, or friendship ties with individuals who affect or could reasonably affect their objectivity and independence in the performance of their duties or in decision-making on behalf of and for the COMPANY.

This declaration extends to any individual working at the COMPANY or at any public or private entity with which the COMPANY maintains commercial or any other type of relationship, including public administration entities that regulate or oversee its activities.

In the event the second alternative (YES) is selected, please provide the details of the person with whom you have a family, affinity, marital or common-law relationship, and who works at companies that are suppliers of Intercorp Retail or any of its affiliated companies:

Full name:	
Position:	
Organisation:	
Type of relationship:	

Full name:	
Position:	
Organisation:	
Type of relationship:	

I hereby sign this document and declare under oath that all the information contained herein is true, in the city of ____________________, on the ____ day of the month of ____________, in the year 20__.

SIGNATURE ....

NAME …………………………………………………..

D.N.I. No. …………………………………………………..