

# INTERCORP FINANCIAL SERVICES INC.

Customer Due Diligence Guidelines

Anti Money Laundering and Counter-Terrorism Financing

# **Customer Due Diligence Guidelines**

Intercorp Financial Services (IFS), its shareholders, directors, executive officers, and employees must comply with Anti Money Laundering (AML) and Counter-Terrorism Financing (CTF) regulations in force. IFS ensures the correct implementation of policies and procedures among its subsidiaries in accordance with the Customer Due Diligence (CDD) policies described herein:

#### 1. Identification

IFS requires its subsidiaries to carry out the following activities with their customers at the beginning of the commercial relationship in compliance with their local regulations:

- o Identification of personal information for new customers including, but not limited to, source of wealth, age, and income.
- o Identification of the ultimate beneficial owner with whom a commercial relationship is established. The beneficial owner is the individual on whose behalf a transaction is conducted and/or who exercises the ultimate effective control over a customer in favor of whom an operation is conducted. It also includes the individual or individuals who effectively exercise control of a legal entity.

The customer information is updated periodically.

#### 2. Verification

IFS requires its subsidiaries to perform identity verification procedures which include ensuring the accuracy of the information provided by customers, for this purpose:

- Verification of the customer's identity using reliable, independent source documents, data, or information.
- Every customer is assessed by AML/CFT and financial crimes risk factors
- Documents presented by non-face-to-face customers will be validated, using local government databases, biometric tools and, if necessary, customers could be contacted for additional verification.

IFS and its subsidiaries do not accept commercial relationships with individuals or businesses that are on the following sanctions lists:

- o Office of Foreign Assets Control (OFAC) List.
- European Union Terrorism Lists.
- Lists related to the Financing of the Proliferation of Weapons of Mass Destruction, including, among others, United Nations Sanctions lists.
- Other lists defined by local authorities.

IFS and its subsidiaries do not have nor maintain anonymous clients, nor fictitious or inaccurate names, or exclusively with codes.

# 3. Monitoring of customer

IFS and its subsidiaries have a robust monitoring system. This includes conducting ongoing monitoring of clients and transactions and performing enhanced due diligence for all business relationships when applicable.

The AML Compliance Officer of each subsidiary reviews and reports any suspicious transactions to the local regulatory authority when applicable, based on local law and internal policies and procedures.

### 4. Enhanced Due Diligence (EDD)

In addition to the due diligence measures described above, the subsidiaries are required to perform a risk-based approach enhanced due diligence to customers scored as high-risk for money laundering or terrorism financing.

EDD includes but is not limited to customer transaction review, adverse media check, and screening sanctions and black lists.

EDD is performed by the relationship manager and is signed off/ratified by his senior manager during the onboarding process and throughout the commercial relationship for high-risk clients including PEPs. Once approved by the first line, the Compliance Officer of each subsidiary must ratify the relationship.

## 5. Politically Exposed Person (PEP)

A PEP is defined as an individual who is or has been appointed to public/government function, including heads of state or government, senior politicians, senior civil servants, judges or military officers, senior executives managing public sector companies, political party officials, and presidential candidates among others.

Family members up to second degree of consanguinity and affinity and close associates are also considered high-risk or PEP customers.

IFS and its subsidiaries maintain PEP classification indefinitely (once a PEP, always a PEP). PEPs are subject to Enhanced Due Diligence procedures including family members, close associates, and business accounts where the PEP has more than 25% of ownership.