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	ANTI-CORRUPTION				Version: 08
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I. OBJECTIVE

RIMAC Seguros and RIMAC EPS (hereinafter, “RIMAC”) conduct their activities in accordance with the highest standards of integrity, ethics, and transparency.

Within this framework, RIMAC maintains a ZERO-TOLERANCE policy toward any form of bribery or corruption, whether in the public or private sector, and prohibits:

- Offering, promising, giving, requesting, or accepting undue advantages.
- Obtaining or retaining business through unlawful or unethical conduct.
- Using third parties, intermediaries, or indirect mechanisms to channel improper payments.

This Policy seeks to prevent, detect, and respond promptly to corruption risks, protect RIMAC’s reputation, and strengthen a culture of integrity throughout the organization.

II. SCOPE

This Policy applies to RIMAC’s directors, employees, suppliers, customers, insurance brokers, and third parties, particularly those acting in its name, on its behalf, and/or for its benefit.

III. DEFINITIONS

- **Sponsorships:** The allocation of financial resources or tangible assets to occasional events and activities for commercial purposes related to customer loyalty and/or brand promotion.
- **Undue Benefits:** Any economic or non-economic advantage obtained or offered in violation of the law or internal policies as a result of bribery, which improperly influences a person’s decisions or actions in the performance of their duties.
- **Integrity Channel:** The formal and confidential mechanism made available by RIMAC through which any person may report actual or suspected irregularities, regulatory breaches, acts of corruption, discrimination, or other improper conduct that actually or potentially affects RIMAC’s values and principles.
- **Political Contributions:** Donations made in cash or in kind to contribute to a political activity.
- **Corruption:** Any conduct whereby an undue advantage is offered, promised, given, requested, or accepted in order to improperly influence decisions or actions, whether in dealings with public officials or between private parties. This includes bribery, facilitation payments, improper commissions, kickbacks, influence peddling, collusion, manipulation of procurement, sales, claims, or other processes, and concealment of such conduct in accounting records.
- **Donations:** The act of giving funds or other assets to an individual, group, or institution, generally for charitable or humanitarian reasons or for the benefit of organizations aligned with RIMAC’s purpose.

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- **Crime Prevention Officer:** The employee appointed by the Board of Directors who is responsible for overseeing the proper operation of and compliance with the Corporate Integrity Program.
- **Public Entity:** An organization that forms part of the State and has been established by law to perform public functions or provide services in the public interest, acting on behalf of the State and subject to public law.
- **Public Officials:** Persons who, by virtue of their position or duties, have responsibilities in the public sector or in international organizations, including State authorities and employees; political actors; and employees of public international institutions such as the World Bank, IMF, United Nations and OAS.
- **Hospitality:** Any expression of courtesy, attention, or cordial treatment offered or provided by or to third parties within a legitimate institutional, commercial, or professional relationship and involving goods, services, benefits, or experiences. It may include gifts, courtesies, promotional merchandise and invitations, including related meals, transportation, accommodation, registration fees, or similar expenses.
- **Anti-Corruption Laws:** The laws of the countries or markets in which RIMAC operates that prohibit acts of bribery and corruption.
- **Facilitation Payments:** Small payments made to generally lower-ranking public officials to expedite or secure a routine, non-discretionary governmental action or an action required by law. For purposes of this Policy, they constitute an act of corruption.
- **Corporate Integrity Program:** The framework encompassing all anti-corruption policies, procedures, and controls, as well as controls concerning the other types of offenses covered by Law No. 30424 and its amendments. Hereinafter, the "Program."
- **Bribery:** The offering, promising, giving, accepting, or requesting of an undue advantage, in violation of applicable law, as an inducement or reward for a person to act or refrain from acting in connection with the performance of that person's duties.
- **Third Parties:** Suppliers; counterparties whose agreements are unrelated to the acquisition of goods or services, including donations, sponsorships, commercial alliances, and investment intermediaries; other counterparties related to leases or properties, real-estate transactions, salvage and real-estate investments; and any other RIMAC third party.

IV. ROLES AND RESPONSIBILITIES

4.1. Board of Directors and/or GIR Committee

- Appoint the Crime Prevention Officer.
- Approve the Anti-Corruption Policy, Code of Conduct, and the Program's strategic decisions.
- Ensure and authorize adequate resources for implementation and sustainability of the Program.
- Receive and review information on Program performance and effectiveness at least annually.

4.2. Compliance Committee

- Oversee implementation and effectiveness of the Program and Anti-Bribery Management System.
- Periodically review results, relevant risks, and improvement plans.
- Escalate critical matters requiring a governance decision to the GIR Committee and/or Board.

4.3. Conduct Committee

- Review escalated cases and issue determinations regarding violations and actions to be taken.

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- Propose disciplinary or corrective measures under internal regulations.

4.4. General Management

- Allocate adequate and sufficient resources for operation of the Program.
- Oversee implementation of this Policy and development of the Program.

4.5. Crime Prevention Officer

- Propose risk appetite and tolerance levels.
- Have the autonomy and independence required to perform the duties.
- Design, implement, maintain, and improve the Program.
- Identify, assess, and monitor corruption and bribery risks.
- Advise, train, and communicate on the Policy and integrity standards.
- Oversee compliance and propose corrective actions.
- Report to the Compliance Committee and/or Board at least annually.
- Participate in and support investigations, audits, and Program assessments.

4.6. Executive Vice Presidency of Talent

- Integrate the Policy and guidelines into RIMAC's regulatory training program and retain execution evidence.
- Communicate and provide the Policy to new employees during onboarding.
- Implement approved sanctions for breaches, where applicable.

4.7. All Employees

- Apply this Policy.
- Request guidance where necessary.
- Report any indication, suspicion, or occurrence of a possible breach through the Integrity Channel.

V. IMPLEMENTATION

5.1. GENERAL GUIDELINES

Non-Negotiable Principles

These principles apply to every decision and actions, without exceptions:

- Zero tolerance for any form of bribery or corruption in the public or private sector.
- Integrity takes precedence over any commercial, operational, or financial objective.
- Any concern or risk must be promptly reported to the Ethics and Compliance Department.
- All employees must comply and cooperate with the Program as directed, including providing truthful and timely information, participating in training, and applying defined controls.

Absolute Prohibitions

- Offering, requesting, or accepting bribes, facilitation payments, or undue advantages.

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- Obtaining personal benefits in exchange for improper decisions or influence.
- Using third parties or intermediaries to channel or conceal improper payments.
- Recording or authorizing false or misleading transactions.
- Retaliating against persons who report breaches or suspicions in good faith.

5.2. SPECIFIC GUIDELINES

5.2.1. Interaction with Public Officials

All interactions with public officials must be transparent, justified, documented, and within the employee's functional remit. The specific rules are in Appendix 01. It is prohibited to offer, give, accept, or request gifts, travel, courtesies, or undue benefits; disclose confidential or privileged public-procurement information; make unapproved donations or sponsorships; exert improper influence; or provide or receive benefits to obtain undue advantages.

5.2.2. Bribery and Corruption Between Private Parties

All interactions with customers, suppliers, brokers, or other private third parties must be transparent, justified, documented, and compliant with RIMAC processes. Commercial and operational processes, including sales, discounts, payments, commissions, claims, sponsorships, donations, and contract renewals or amendments, must be free from improper manipulation.

5.2.3. Conflicts of Interest

Employees must avoid situations where personal, family, or financial interests could compromise impartiality in procurement, negotiations, supervision, or relationships. Potential conflicts must be reported immediately to Ethics and Compliance. Specific rules are in the Conflict of Interest Management Policy.

5.2.4. Hospitality: Gifts and Invitations

Hospitality must be reasonable, occasional, transparent, and supported by a legitimate institutional purpose. RIMAC prohibits hospitality intended, or reasonably interpreted, to exert improper influence, create a conflict, constitute bribery, or breach the Program. Lower-risk hospitality comprises gifts, courtesies, and promotional merchandise; higher-risk hospitality comprises external invitations.

5.2.5. Donations and Sponsorships

Donations and sponsorships may only serve legitimate social welfare, sustainability, or institutional purposes; align with RIMAC values; and create no conflict or improper influence. They must be channelled through responsible areas and reviewed in advance by Ethics and Compliance. Cash or cash-equivalent donations to public entities or individuals acting for them are prohibited.

5.2.6. Political Contributions

RIMAC makes no direct or indirect political contributions. No employee, supplier, counterparty, or third party may contribute in RIMAC's name or use company resources. Personal contributions must be disclosed in advance to Ethics and Compliance for conflict and reputational-risk assessment.

5.2.7. Procurement of Goods and Services

All procurement is subject to due diligence. Employees must verify a genuine need; ensure fees, prices, and expenses are reasonable and correspond to services rendered; remain alert to unusual acceleration or

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unexpected decisions; and refrain from payments reasonably suspected of being channelled as undue benefits. Red flags must be reported immediately.

5.2.8. Mergers and Acquisitions

RIMAC may participate in mergers, acquisitions, or other corporate transactions provided anti-corruption due diligence is conducted beforehand.

5.2.9. Strategic Alliances and Joint Ventures

Before formalization, RIMAC must conduct due diligence on involved persons and entities. Agreements must include integrity requirements and clauses enabling audits, reviews, or oversight to mitigate partner non-compliance risk.

5.2.10. Books and Accounting Records

RIMAC must develop, document, retain, and continuously improve internal financial controls so all transactions are accurate, complete, and transparent. Payments must be properly recorded; entries or payments concealing or facilitating corruption are prohibited; and transactions require supporting documentation.

5.2.11. Petty Cash, Accountable Advances, Advance Payments, and Other Expenses

Petty cash, accountable advances, travel, representation, and other expenses must be used exclusively for legitimate business purposes, never as a means of corruption, and must meet reasonableness, proportionality, and transparency requirements.

5.3. REPORTING PROCEDURES

Any employee, supplier, counterparty, or third party who becomes aware of or reasonably suspects a potential breach must report it through RIMAC's Integrity Channel. The Channel is managed by an independent specialized third party to ensure confidentiality, requested anonymity, and appropriate handling.

- Website: <https://www.canaldeintegridad.com/rimac/>
- Email: rimac@canaldeintegridad.com
- Telephone: 0-800-1-8114 and 219-7104, option 2.
- Postal address and in-person interviews: Av. Víctor Andrés Belaúnde 171, San Isidro, Lima 27, Lima, Peru. Attention: Forensic and Integrity Services Partner. Reference: RIMAC Integrity Channel.

Questions may be sent to cumplimiento@rimac.com.pe. RIMAC guarantees confidential treatment and prohibits direct or indirect retaliation against good-faith reporters and people cooperating in investigations. Consult the Reporting Management and Investigation Policy for further details.

5.4. MONITORING AND CONTINUOUS IMPROVEMENT

Each year, the Compliance Department prepares a results report on the main Program components for the Board and/or relevant committee. Continuous improvement measures consider, among other matters, risk evolution, measurement, controls, and monitoring.

5.5. NON-COMPLIANCE WITH THE POLICY AND DISCIPLINARY MEASURES

Failure to comply constitutes a workplace violation that may result in disciplinary sanctions. The sanction shall reflect the seriousness of the case and applicable law and may include removal from the employee's position, without prejudice to civil or criminal action.

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VI. RELATED DOCUMENTS

CODE	NAME
MAN-4792	Code of Conduct
POL-6093	Reporting Management and Investigation Policy
POL-4885	Conflict of Interest Management Policy
POL-6061	Due Diligence Policy
MAN-4656	Internal Work Regulations
MAN-4973	Conduct Committee Regulations
Law No. 30424	Law governing administrative liability of legal entities for bribery, money laundering, and terrorist financing offenses
Legislative Decree No. 1352	Legislative Decree expanding administrative liability of legal entities
Law No. 31740	Law amending Law No. 30424
SMV Resolution No. 006-2021-SMV/01	Guidelines for Implementation and Operation of the Prevention Model

VII. APPENDICES

7.1. APPENDIX NO. 01 - SPECIFIC GUIDELINES FOR INTERACTION WITH PUBLIC OFFICIALS

7.1.1. Meetings

A. Meetings with Public Officials

- Before: define a business-related reason; confirm alignment with duties; ensure two RIMAC participants or obtain EVP clearance; use an authorized digital platform or official premises; prepare an agenda and appoint a recordkeeper.
- Exceptional role mismatch: obtain VP/EVP authorization and disclose through the intranet form with grounds at least 24 hours in advance.
- During: maintain formality; do not offer, accept, request, or imply undue benefits; document all agreements through formal means.
- After: prepare minutes with date, participants, purpose, agreements, owners, and deadlines; retain evidence; immediately report incidents or red flags.
- Incidental encounters: avoid conversations aimed at obtaining undue benefits and immediately report irregular requests or risks.

B. Provision of Services or Issuance of Products

- Follow applicable regulations and internal processes without informal exceptions. Public-entity contracting or issuance must use formal channels and authorized areas. Transactions with public officials as individuals must follow internal procedures. Payments to public entities must be made in the entity's name, comply with local rules, and be supported and retained.

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C. Inspections and/or Regulatory Reviews

- Handle reviews promptly, transparently, and cooperatively. Meet statutory deadlines without improper delay or acceleration. Provide truthful, complete, supported information. Maintain professional treatment, use designated RIMAC representatives, document conclusions, and archive them.

D. Prohibitions

- No gifts, travel, courtesies, or undue benefits; no disclosure of confidential tender or procurement information; no unapproved donations or sponsorships to officials; no improper influence; and no invitations, training, sponsorships, or benefits intended to secure undue advantages.

E. Reporting Channel

- Report meetings through the Public Official Meeting Form on the intranet. Report incidents and red flags to cumplimiento@rimac.com.pe.

7.2. APPENDIX NO. 02 - HOSPITALITY MANAGEMENT PROCEDURE: GIFTS AND INVITATIONS

A. Classification

Lower-risk hospitality includes gifts, courtesies, and promotional merchandise. Higher-risk hospitality includes external invitations.

B. Lower-Risk Hospitality Received

Verify the source is not a public official or public entity and that the item is not cash or a cash equivalent; otherwise reject and record it. Estimate and document value. Items up to PEN 50 may be accepted without registration. Items over PEN 50 and under PEN 300 may be accepted but must be registered within five business days with evidence retained. Items over PEN 300 must be rejected or, exceptionally, delivered to Ethics and Compliance for a raffle, registered with justification, and supported by retained evidence. Gifts from public officials, to relatives, during negotiations, as thanks for services, delivered to private homes, harmful to reputation, creating apparent conflicts, or breaching compliance documents are prohibited.

C. Lower-Risk Hospitality Provided by RIMAC

Do not provide it to public officials or public entities. Substantiate a RIMAC objective, alignment with values, and approved budget. Screen customers, third parties, and brokers against sanctions and restricted-party lists; use formal channels and retain evidence. Cash and cash equivalents, gifts during negotiations, reputationally harmful gifts, apparent conflicts, and gifts breaching compliance documents are prohibited.

D. Higher-Risk Hospitality Received

Before acceptance, verify legitimate institutional interest, connection to duties, occasional nature, and absence of personal or undue benefit. Travel invitations must be sent to cumplimiento@rimac.com.pe. Local invitations require requesting-division EVP approval. International invitations additionally require Ethics and Compliance and Conduct Committee approval and may be accepted only after all approvals. Exceptionally, the Committee may approve third-party payment of related international travel expenses.

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E. Higher-Risk Hospitality Provided by RIMAC

Substantiate a clear RIMAC-aligned objective and approved budget. Screen customers, third parties, and brokers; retain invitee, justification, budget, and invitation evidence. Invitations to public entities require prior Ethics and Compliance clearance through cumplimiento@rimac.com.pe.

F. Precedence Rule

Internal guidelines may be stricter but not less stringent than this Policy. Read these rules together with the Corporate Travel Policy.

7.3. APPENDIX NO. 03 - RED FLAGS

Red flags may justify enhanced due diligence and may arise in intermediary engagements, acquisitions, investments, commercial transactions, gifts, and charitable contributions. Employees must report identified red flags immediately to the Crime Prevention Officer.

Non-exhaustive list:

1) Third Parties

- Adverse background information linking the third party to corruption or another offense.
- Unjustified reluctance to disclose shareholders or representatives, or requests to keep ownership secret.
- Advance payments or excessive or above-market commissions.
- Excessive subcontractor use to interact with public officials.
- Cash payments or payments in another country.
- Unjustified use or sudden engagement of an intermediary around an award.
- Refusal to certify anti-corruption compliance or include contractual clauses.
- Requests to offer a job or internship to a particular person.

2) Public Officials

- A request to engage a third party on an official's recommendation.
- A request to offer a job or internship to a particular person.
- A proposal or indication that gifts are needed in tendering, litigation, judicial, administrative, or other proceedings to favor RIMAC.

VIII. APPROVAL WORKFLOW

STAGE	AREA	POSITION	NAME
Preparation/update	Compliance	Crime Prevention Manager	Christian Balcazar
Review	Compliance	Crime Prevention Deputy Manager	Carlos Zavala
Approval	Compliance	Compliance Manager	Sara Sologuren
Approval	Risk Division	Executive Vice President of Risk	Ariel Roitman
Approval (Methodology)	Process Management	Business Process Engineer	Jose Marquez
Publication	Comprehensive Risk	Operational Risk	Renato Bedoya

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	Management Committee / Board of Directors	Management Manager	
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IX. CHANGE CONTROL

DOCUMENT CREATION			
PREPARATION DATE	DESCRIPTION	VERSION	PREPARED BY
24/07/2018	Initial document approved by the Board of Directors	01	Poul Carrillo / Fiorella Zelvaggio
27/08/2019	Alignment with new regulatory guidelines and agreements adopted by the Compliance Committee and approved by the Board	02	Mario Izaguirre
23/04/2020	Update of criteria for meetings with Public Officials and of the Appendix	03	Analí Castro / Fiorella Zelvaggio
27/05/2020	Incorporation of guidelines on selection processes and privileged information; amendment of approval rules for Donations to Public Entities	04	Analí Castro / Fiorella Zelvaggio
15/11/2021	Guidelines regarding claims payments to public entities and update to the company's new structure	05	Analí Castro / María Nieves Pereyra
04/05/2024	Incorporation of offenses under Law No. 30424, its amendments, and Regulations	06	Cinthya Meza / Johanna Mas
20/12/2024	Alignment with ISO 37001 Anti-Bribery guidelines	07	Christian Balcazar / Sara Sologuren
05/03/2026	Strengthening anti-corruption guidelines and	08	Christian Balcazar / Carlos Zavala

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	alignment with ISO 37001:2025		
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