

CODE OF ETHICS

Intercorp Retail



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MESSAGE FROM OUR GENERAL MANAGER, JUAN CARLOS VALLEJO

Intercorp Retail is a company with a clear commitment to its customers, recognizing the vital role of stakeholders and upholding a strong sense of social responsibility. It is firmly dedicated to contributing to Peru's development. This commitment is made possible and sustained by our team, which forms the foundation of our core strengths.

We are thousands of team members who form a large family, united by a steadfast commitment to consistently act in alignment with the Organization's Pillars, Values, and ethical principles, with the full support of Senior Management.

To ensure these principles remain at the forefront of our actions, this document — which consolidates our commitments as a company and outlines the standards of conduct expected from all Intercorp Retail employees— must guide our daily conduct. It should serve as a tool for dissemination and training for the Organization's leaders, and as a permanent reference for all our employees.

This declaration of principles is not only aligned with international best practices but also with the highest global standards in this area, but more importantly, it reflects our business vision and the role we have embraced as part of Peruvian society, of which we are proud to be members. Through this role, we aspire to foster not only economic prosperity but also a model of a more just and ethical society, one that contributes to a better reality for present and future generations.

Let's always act with ethics!

Juan Carlos Vallejo

SCOPE OF APPLICATION AND RESPONSIBILITIES

To Whom the Intercorp Retail Code of Ethics Applies

Our Code of Ethics applies to all employees of the Business Units that make up Intercorp Retail: IR Management S.R.L., InRetail Perú Corp, Supermercados Peruanos S.A., InRetail Pharma S.A., Quicorp S.A., Real Plaza S.R.L., Homecenters Peruanos S.A., Tiendas Peruanas S.A., Financiera Oh! S.A., InDigital S.A.C., and IR Digital S.A.C., including their subsidiary companies, as well as the employees of the Corporate Unit and the members of the Board of Directors.

Each Business Unit operates under its own policies, all of which are aligned with Intercorp Retail's Code of Ethics.

We also expect our suppliers, consultants, contractors, and all business partners working with us to conduct themselves ethically and in a manner consistent with our Code of Ethics. When engaging third parties, we must take reasonable steps to ensure that they are aware of this Code, possess a reputation for integrity, and act responsibly in accordance with the principles of our Organization.

The Code and the Policies of the Business Units

- In the event of a conflict between the provisions of this Code and the provisions of the Codes of Ethics or internal policies of each Business Unit (if any), the provisions of this Code shall prevail.
- The Boards of Directors of the companies that make up the Organization shall be responsible for aligning the Organization's policies with the content of this Code.
- In the event of a conflict between the provisions of this Code and applicable law, the applicable law shall prevail.

Responsibilities of Employees

It is the responsibility of each of us to:

- Comply at all times with the law, our internal regulations, and this Code. If you observe a colleague violating any of these, or if someone—regardless of their hierarchical level—asks you to do something you believe goes against them, discuss it immediately with your manager or report it through the channels provided by the ConÉtica (WithEthics) program. We alone are accountable for our own actions.
- Read, understand, and incorporate our Cultural Pillars/Values into our daily work.
- Be familiar with the policies relevant to our role, especially those aimed at preventing risks related to corruption, money laundering, and terrorist financing within the Organization.
- Seek guidance from our immediate supervisor when we have questions or concerns about the application of this Code of Ethics or other policies as they arise.
- Immediately report any act that may constitute a breach of our regulations, the Code of Ethics, or the law to your immediate supervisor. Remember, failure to report such acts implies shared responsibility. If you report an ethical issue to your supervisor and it is not resolved within a timeframe you consider reasonable,

escalate it through the ConÉtica program's reporting channels. The various reporting methods are described later in this document.

- Cooperate fully with investigations and provide truthful and timely information.
- Identify issues and propose improvements to help reduce any gaps we may have detected in our daily work.

Additional Responsibilities of Leadership Positions

Intercorp Retail places full trust in its leaders and entrusts them with the significant responsibility of guiding other team members. Accordingly, they are expected to fulfill the following additional obligations:

- Lead by example.
- Promote a culture of prevention.
- Foster an environment that encourages adherence to our Code of Ethics by motivating team members to act with integrity at all times, avoiding even the appearance of ethical misconduct.
- Ensure open communication by encouraging team members to ask questions related to our Code of Ethics.
- Report any ethical issues identified or brought to their attention.
- Meet regularly with direct subordinates to review our Cultural Pillars/Values and our Code of Ethics.
- In cases where there is a conflict between our principles and the Pillars/Values and business objectives, ensure that ethics take precedence.
- If an ethical issue arises with a team member, ensure that others in the area are not making the same mistake.
- Never conceal or ignore an ethical conduct issue. Address it promptly and seek guidance if necessary.
- Express appreciation to team members who raise ethical concerns.
- Never retaliate against anyone for reporting an ethical concern, supporting investigations, or participating in any process related to a possible violation of law, regulation, or suspected fraud.
- Once an ethical issue has been raised, do not interfere with any related investigation.
- Promote a culture in which team members feel empowered to report their own ethical missteps (self-reporting). If a team member voluntarily discloses involvement in an ethical breach, this will be taken into consideration when determining corrective actions.

GUIDE TO THE USE OF THE CODE OF ETHICS

Our Code of Ethics provides guidelines for behavior and conduct that foster an honest, fair, and impartial workplace, operating in compliance with our internal regulations, the Code itself, and applicable laws. It helps you identify situations in your work that may arise that could go against the ethical standards and conduct norms that define us as an Organization. It also offers guidance on what to do if you have questions about what constitutes ethical behavior or if you encounter situations you believe should be reported.

Structure of Our Code of Ethics

- It begins with our Cultural Pillars/Values, which serve as the primary guide for our daily conduct and should be considered in every decision we make.
- It then outlines how our Ethics System operates and identifies who is expected to comply with the provisions of this Code.
- The section titled *How to Address an Ethical Issue* provides general guidance on how to proceed when:
 - We encounter a situation where we are unsure about whether our regulations, codes, or laws may have been or may be violated;
 - We have confirmed that our regulations, codes, or laws have been or will be violated.
- Following this, you will find the conduct guidelines, detailing what the company offers and what it expects from us regarding in our daily responsibilities, as well as in our interactions with colleagues and key stakeholders: our customers, suppliers, authorities, the community, and the environment.
- This guide provides general information on several—but not all—policies of Intercorp Retail and its Business Units. It should not be viewed as an exhaustive document, but rather as a declaration of our approach to acting as employees of Intercorp Retail.

CULTURAL PILLARS/VALUES OF INTERCORP RETAIL

Integrity

- I act consistently and uphold the Organization's rules, policies, and Cultural Pillars/Values.
- I take responsibility in all circumstances.

Results-Oriented

- I focus my efforts on achieving the goals set by the Organization, making optimal use of available resources.
- I anticipate business needs and seek efficient solutions.
- I pursue excellence as the minimum standard.

Teamwork

- I think about what is best for the Organization before making any decision.
- I cooperate and proactively support the team.
- I value my team members and their contributions.

Spirit of Self-Improvement

- I continuously seek to improve my work in ways that help enhance the Organization.
- I am mindful of my professional growth and direct my efforts toward ongoing development.

Customer Passion

- I center my work on delivering value to the customer, aiming to meet their expectations and build loyalty.
- I listen to my customers and provide solutions aligned with their needs.

OUR ETHICS SYSTEM

At **Intercorp Retail**, we take pride in being composed of companies that are recognized and valued by society. We believe that our Cultural Pillars/Values and ethical integrity are essential to achieving sustainable development and long-term growth. For this reason, we have implemented a system that enables the continuous improvement of our ethical culture.

ConÉtica Program

To ensure that our Code of Ethics is embedded in our daily actions, we have created the ConÉtica Program. This initiative is designed to encourage ethical behavior and reinforce positive conduct aligned with our Cultural Pillars/Values, which define us as the strong team behind Intercorp Retail. These Cultural Pillars/Values should guide us in our day-to-day activities and serve as a reference in every decision we make as employees.

How Does It Work?

Being part of the Intercorp Retail team is a source of pride for all of us, and we are each responsible for upholding our ethical culture and strong reputation, both within and beyond the Organization. That is why everything begins with us — each of us must be familiar with and comply with our internal regulations and applicable laws, and consistently choose to do what is right. A key part of this responsibility also involves remaining vigilant and reporting any conduct that violates these standards.

Intercorp Retail and its Business Units have established an Ethics Committee whose mission is:

“To ensure compliance with and the continuous improvement of the Organization’s standards of conduct, as well as to create the conditions necessary to strengthen the ethical culture and promote the commitment and active participation of all employees through prevention.”

The Ethics Committee of each Business Unit and of Intercorp Retail is responsible for receiving reports submitted either directly or through the company that manages the ConÉtica hotline. These reports must be addressed and escalated to the General Manager and/or the Audit Committee, depending on their severity. All reports received will be reviewed and evaluated, and handled with complete confidentiality.

Committee members, who may be approached directly if needed, include:

- Chief Financial Officer / Finance Director / Vice President of Finance
- Chief Human Resources Officer / HR Director / Vice President of Human Resources
- Chief Legal Officer / Legal Director / Vice President of Legal or Corporate Affairs
- Auditors or Ethics Officers from the various Business Units within Intercorp Retail
- Compliance Officer

If we have any concerns we wish to report regarding conduct that may be illegal, unethical, or in violation of our internal regulations—in other words, inconsistent with the Intercorp Retail Code of Ethics—the first person we should speak to is our immediate

supervisor. However, if we believe that this is not appropriate, ConÉtica provides the following reporting channels:

- **Web Form**

You may submit or check the status of a report at: www.conetica.pe

- To file a new report, visit the link: [Registrar Reporte](#)
- To check the status of an existing report, visit the link: [Consular Reporte](#).

- **Mailbox**

You may send an email to the following address:

- Corporate Unit of Intercorp Retail: intercorpretail@conetica.pe
- InRetail: inretail@conetica.pe
- Supermercados Peruanos: spsa@conetica.pe
- Farmacias Peruanas: farmaciasperuanas@conetica.pe
- Inkafarma: inkafarma@conetica.pe
- Mifarma: mifarma@conetica.pe
- Química Suiza: quimicasuiza@conetica.pe
- Real Plaza: realplaza@conetica.pe
- Promart: promart@conetica.pe
- Oechsle: oechsle@conetica.pe
- Financiera Oh!: financieraoh@conetica.pe
- InDigital: indigital@conetica.pe
- IR Digital: irdigital@conetica.pe

- **Phone Number**

You can contact a professional directly at any time, from any landline or mobile phone, by dialing:

- 0-800-7-8323 (toll-free)

HOW TO DEAL WITH AN ETHICAL DILEMMA

In our day-to-day work, we are constantly faced with decisions, and the answers are not always black or white—there are nuances. What may be appropriate for some may not be suitable for others, and we often face these situations with uncertainty: *What will my colleagues think? Will my boss be upset? I'm not sure it's right, but "it's what's needed." Should I go ahead?*

InterCorp Retail strives to uphold a culture grounded not only in trust but also in individual responsibility. We recognize, however, that ethical dilemmas or situations that may violate our internal regulations, this Code of Ethics, or the law can arise within our Organization. These situations may involve our own—whether intentional or unintentional—or those of others connected to the company, such as fellow employees or suppliers. The following section provides guidance on how to proceed in such cases.

How Do I Tell If I'm Facing an Ethical Issue?

When confronted with a situation that raises doubts about whether it represents an ethical issue, it is important to pause and ask ourselves the following questions before taking action:

- Do I feel comfortable with what I'm doing or being asked to do? Do I believe it is the right thing?
- Is it legal?
- Am I certain that neither I nor my family or friends will benefit in any way from my decision? What about a colleague or supplier?
- Is it aligned with our Cultural Pillars/Values?
- Would someone I trust act the same way in this situation?
- How would I feel if this were published on the front page of a newspaper?
- Would my family be proud of me?

Certain thought patterns can mislead us and steer us in the wrong direction. In some situations, we might try to justify our actions by saying:

- Just this once doesn't matter.
- No one will notice.
- Everyone does it.
- This is nothing compared to what others do.
- If he or she does it, it's not my problem.

If you answered "no" to one or more of these questions, or found yourself considering any of these justifications or your own behavior or someone else's, you are very likely facing an inappropriate situation.

How to Act

The first person you should approach is your immediate supervisor. If, for any reason, you believe this is not the best option, you may speak with any trusted company executive. However, if you still do not feel comfortable with these alternatives, the company offers the ConÉtica hotline, which provides several completely confidential and anonymous channels through which you can submit your report with the assurance that your identity will not be disclosed and you will not face retaliation—regardless of the severity of the case or the individual(s) involved.

If you have been involved in an ethical issue or have committed a breach of the Code of Ethics and choose to report it voluntarily, this may be considered a mitigating factor when determining any disciplinary action.

ConÉtica is based on the principle of good faith, meaning that all reports must be submitted responsibly, providing honest and accurate information to the best of the reporter's knowledge at the time of submission. It is understood that following the investigation, some reported situations may prove to be only apparent. However, knowingly and intentionally submitting partial, false, or misleading information constitutes a serious violation. Intercorp Retail reserves the right to sanction anyone who engages in such misconduct.

Non-Retaliation Policy

Employees who submit reports play a vital role in maintaining an ethical, fair, and honest work environment, allowing issues to be addressed proactively and preventing more serious consequences. It is our collective responsibility to create a workplace culture where everyone feels empowered to report ethical concerns—whether real or perceived—in good faith, without fear of retaliation.

At Intercorp Retail, retaliation against individuals who report situations that may constitute a breach of our Code of Ethics will not be tolerated. All reports will be handled with strict confidentiality and may be submitted anonymously. If the reporting individual chooses to disclose their identity, it will be kept confidential within the team responsible for investigating the case.

Should an employee choose not to report anonymously, their colleagues mustn't isolate them; on the contrary, they must be treated with respect. Any change in behavior or treatment toward a reporting employee may be considered a form of retaliation.

What Should Be Reported Immediately

There are certain types of misconduct that, due to their severity, must be reported without delay. These include:

- Corruption or bribery
- Money laundering
- Financing of terrorism
- Unlawful acts involving a supervisor, manager, vice president, director, or department head
- Unlawful acts involving the General Manager or Chief Financial Officer
- Fraud or theft

- Concealment of products unfit for sale
- Inaccurate accounting records or financial statements
- Unauthorized access to information systems
- Misuse of information
- Fraudulent manipulation in procurement processes
- Occupational health and safety risks
- Obstruction of an investigation, including the destruction of relevant documents or evidence
- Conflicts of interest

RELATIONSHIP WITH OUR EMPLOYEES

“We are committed to maintaining an excellent work environment—one of mutual respect, free from discrimination and safe—while strictly complying with all applicable laws.”

Corruption, Money Laundering, and Terrorism Financing

At Intercorp Retail, we maintain a zero-tolerance policy toward any act that violates the standards and policies designed to prevent risks related to corruption, money laundering, and the financing of terrorism.

Any action that contravenes these rules and policies is considered a serious offense and may result in termination of employment.

It is the responsibility of every employee to remain continuously informed about these standards and policies, actively participate in all organizational training sessions, and report any known or reasonably suspected violations immediately.

Harassment, Diversity, and Tolerance

At Intercorp Retail, we strive to ensure that our employees carry out their work in an environment of mutual respect, dignity, fairness, and cordiality. We recognize that diversity in gender, race, political beliefs, religion, age, sexual orientation, disability, marital status, or any other characteristic enriches our workplace. Therefore, we strictly prohibit all forms of discrimination. We must provide a discrimination-free and tolerant environment for our employees, customers, and suppliers.

Any inappropriate conduct of a sexual nature—whether verbal, visual, or physical—will be considered sexual harassment. Likewise, we firmly reject all forms of harassment or violence, whether sexual, physical, or verbal.

Intercorp Retail will promote and oversee actions to prevent any of its employees from engaging in harassment or behavior that undermines diversity and tolerance, in accordance with the laws of the countries in which the Organization operates.

Occupational Health and Safety

Intercorp Retail places special emphasis on matters related to occupational health and safety, recognizing that providing a safe environment for both work and shopping is essential to our mission.

We actively promote measures that protect the life, health, and safety of our employees, in strict compliance with applicable legislation and internal provisions outlined in our Occupational Health and Safety Regulations. We also ensure the availability of the necessary safety tools and equipment to carry out work tasks effectively.

No employee is required to perform tasks under conditions that violate occupational health and safety standards or regulations.

Furthermore, we encourage active participation from all employees in identifying hazardous conditions and behaviors, which must be reported immediately to the responsible teams.

Alcohol and Drugs

We are committed to providing a work environment free of alcohol, tobacco, and drugs. Employees are strictly prohibited from possessing, distributing, or being under the influence of drugs and/or alcohol while on the Organization's premises or in its vehicles. Working under the influence of these substances poses a risk to the physical safety of colleagues and customers.

Compliance with Labor Regulations

We are fully committed to complying with all applicable labor laws, including those related to overtime, vacation, break periods, rest days, and corresponding payments such as minimum wage and other related matters.

Under no circumstances may a supervisor, manager, director, or executive request that an employee perform job-related tasks without proper compensation.

Work Environment

Intercorp Retail is dedicated to being a great place to work and we strive for this to be reflected in our employees' perceptions of leadership, work environment, tools, and other factors. To this end, we conduct regular assessments in which employee feedback is highly valued.

We are all responsible for maintaining a positive workplace environment. Therefore, we must be aware that our attitudes, comments, and jokes can affect our colleagues, supervisors, customers, and everyone around us. We must always demonstrate a culture of respect!

Training

Intercorp Retail is committed to promoting the Code of Ethics and ensuring that all employees receive training on its proper implementation. Accordingly, the Board of Directors or General Management must approve annual training programs focused on adherence to the Code of Ethics.

DIVERSITY AND INCLUSION

“We recognize the importance of gender equity, inclusion, and diversity as fundamental Pillars/Values for the sustainable development of our Organization. That is why we actively promote the growth and development of all our employees based on their merits, abilities, competencies, and performance, thereby fostering a diverse and meritocratic culture.”

Professional Development and Career Growth

We strive to promote equitable training opportunities for all personnel, taking into account each individual's circumstances. We are committed to ensuring objectivity in the application of our compensation, remuneration, and promotion policies, avoiding any unjustified differentiation based on discriminatory grounds. To achieve this, we conduct performance evaluations that, among other factors, serve as an objective foundation for promotions based on merit. Likewise, we ensure compliance with our recruitment, selection, and hiring policies to ensure equitable processes.

Flexibility and Respect for Personal Time

We respect all employees by implementing and honoring flexible work practices and work-life balance initiatives that enable our staff to fulfill family responsibilities.

Violence-Free Organization

At Intercorp Retail, we reject all forms of violence. Through ConÉtica, we provide safe and confidential communication channels for reporting any incidents of discrimination and/or violence that may arise within the Organization.

We also ensure the proper execution of investigation and disciplinary procedures in response to such incidents. We are responsible for regularly raising awareness and providing training to our team on the prevention of gender-based violence and discrimination.

Internal and External Communications

Internally, we aim to foster inclusive communication that avoids reinforcing gender stereotypes, using inclusive language or neutral terms like “the team,” and always addressing others with respect and openness to diversity. Externally, to the extent possible, we also apply inclusive communication practices, consistently seeking to represent diversity in our messaging and imagery.

WHAT IS EXPECTED OF US AS EMPLOYEES

Intercorp Retail firmly believes in the good faith of its employees and trusts that we will fully comply with our duties and responsibilities, always seeking the company's growth transparently and honestly, and in accordance with internal regulations, codes, policies, and the law. We must also be aware that our behavior—even outside of working hours—can impact the corporate image of the organization.

As employees, we are not only expected to act ethically ourselves, but it is also our responsibility to ensure that others do the same. No one has the authority to ask us to violate our rules, guidelines, policies, or procedures, and we must never use such a request of any individual—regardless of their position—as a justification for doing so. It is part of our responsibility to report any unethical conduct or violations that could affect or potentially affect the company.

We are also expected to identify and communicate opportunities for improvement that we find in our daily work, actively contributing to the continuous improvement of our processes.

Theft, Larceny, and Fraud

Theft is defined as the taking of another person's property, regardless of its value, through the use of force or violence. Larceny, by contrast, refers to the same act without the use of force. Fraud is defined as any intentional act or omission designed to deceive, resulting in a personal gain or benefit for the perpetrator and/or a third party, to the detriment of the Organization's interests.

Loss prevention is a key priority for InterCorp Retail, both to safeguard the Organization's reputation and to prevent financial losses. Therefore, theft, larceny, and fraud are not tolerated under any circumstances.

Protecting the Organization's interests is a shared responsibility, and each of us is obligated to report any fraudulent conduct we become aware of. Preventing such acts is a collective duty.

Any suspicious incident of theft, larceny, or fraud must be reported to your immediate supervisor or through the ConÉtica reporting channels.

Use and Care of the Organization's Assets

We are all responsible for safeguarding the Organization's assets. This means protecting its property — including physical assets, information, facilities, equipment, products, and services. Accordingly, we must not misuse these resources, remove them from company premises without following established procedures, or use them for personal gain or any purpose other than what the Organization has intended.

Customer and supplier data, files, software, information systems, databases, trade secrets, and other similar resources must be protected and used exclusively for InterCorp Retail's legitimate business purposes.

Any intellectual property created in the course of our duties will be considered the property of InterCorp Retail. All representations of the Organization must be used exclusively for official matters directly related to our professional responsibilities.

We must not download or install software on the Organization's computers, as doing so could expose our network to computer viruses or violate software licensing policies.

If the company provides us with an email address, it must be used strictly for business-related purposes and functions, not for personal or unrelated use.

Handling and Use of Information

Information related to our activities, services, products, strategies, negotiations, and the Organization as a whole is confidential and must be protected by all of us.

We must follow and respect the following guidelines:

- Information received by an employee as part of their role is private and must be kept strictly confidential. It should be used only for the Organization's operations and not for personal use or the benefit of any third party.
- InterCorp Retail's information must not be shared with anyone outside the Organization. If requested by an external authority, such requests must be directed through our Legal Department.
- Within the Organization, confidential information should only be shared with individuals who, due to their role, have a legitimate need to know.
- Disclosure of financial or other sensitive information related to InterCorp Retail to external individuals or organizations is strictly prohibited, unless such information has been made public by the Organization itself or officially released through authorized press statements.
- All information related to employees' personal data or employment relationships is confidential, both during their tenure with the Organization and after the employment relationship has ended.
- We also respect the privacy of our customers and safeguard any information they provide. This information must be used solely for legitimate business purposes. Only employees who, due to their role, require access to this information may do so, and under no circumstances may they share or disclose it.
- Employees must immediately report any improper disclosure, use, or handling of information and cooperate in implementing security and control measures to prevent risks that could affect the information owners or the Organization itself.

Trade Secrets

The strategies, methodologies, processes, systems, and know-how developed by InterCorp Retail form part of the Organization's intellectual property and are considered "Trade Secrets."

We are responsible for protecting these trade secrets, as they represent highly confidential business information. In addition to safeguarding our own, it is our policy to respect the trade secrets of others. No employee should ever be compelled to reveal the trade secrets of organizations with which we conduct business. All employees must also ensure that their use of social media does not compromise the confidentiality of InterCorp Retail's trade secrets.

Securities Trading Policy

InterCorp Retail has adopted a **Securities Trading Policy**¹ aimed at preventing the use—or even the perceived use—of Confidential Information² when acquiring or selling securities issued by InterCorp Retail, its subsidiaries, or derivatives based on these securities as underlying assets³ (collectively referred to as “Restricted Securities”). The policy also seeks to prevent price manipulation of these Restricted Securities in compliance with all applicable laws and regulations.

The policy applies to all levels of the Organization where individuals, by virtue of their position or role, have access to privileged information. This includes directors, the General Manager, members of the Management Committee, personnel from the finance, accounting, and legal departments, and any other individual whose role grants access to such information. These individuals must familiarize themselves with the Policy.

Conflict of Interest

A conflict of interest arises when we face a situation in which, either in reality or appearance, conditions exist that may compromise our ability to make fair and objective decisions in the best interest of InterCorp Retail. Such situations may be influenced by personal interests or those of a third party.

To prevent conflicts of interest from compromising our independence or reputation, such situations must be immediately reported to your department manager and copied to the Compliance Officer, using a formal email communication in accordance with the established policies.

Gifts

A gift or benefit is considered to be any present, tip, donation, service, loan, gratuity, item, or benefit, regardless of its value.

It is the policy of InterCorp Retail that its employees must not promote, request, accept, or retain gifts or presents of any kind. This policy must be publicly communicated to customers and suppliers on a regular basis to discourage the customary or courtesy-based exchange of gifts within the community.

Employees must not accept any gift from a customer, supplier, or any individual or organization that conducts or intends to conduct business with InterCorp Retail if such a gift could influence decision-making, facilitate business transactions, or benefit third parties. If, for reasons beyond our control, a gift is received and it is not possible to decline or return it, the employee must inform their immediate supervisor. The gift must then be handed over to the Human Resources Department or its equivalent in each Business Unit for appropriate handling in accordance with current policies.

¹ **Securities Trading Policy of InterCorp Retail Perú Corp. and Subsidiaries for Individuals with Access to Privileged Information**, approved by the Board of Directors of InterCorp Retail Perú Corp. on January 30, 2013.

² **Confidential Information:** May be assigned to an event or ongoing negotiation of a confidential nature when premature disclosure could result in harm to the issuer.

³ **Underlying Asset:** Financial instruments such as stocks, bonds, stock market indices.

Outside Employment

Intercorp Retail requires that its employees dedicate their full working hours to their assigned duties and deliver efficient service.

If an employee takes on secondary employment and/or operates a secondary business—including teaching or giving lectures outside of their regular working hours—they must inform their department manager and the Human Resources Department (or equivalent), who will evaluate the situation. If such activity creates a conflict of interest with Intercorp Retail, the employee will be informed and must decide whether to remain with the Organization or continue with their other job. This decision must be made within a maximum of three (3) days.

External activities must not create a conflict of interest with the employee's position at Intercorp Retail. This means they must not interfere with job responsibilities, duplicate or compete with the employee's professional role, involve the use of company assets, supply products or services to the company, or negatively affect Intercorp Retail in any way.

Political Activities

Intercorp Retail does not restrict its employees from participating in political activities or electoral processes. However, employees choosing to engage in such activities must keep in mind the following:

- They must clearly distinguish between their personal civic participation and their role as an employee of Intercorp Retail. The company is prohibited from providing reimbursements, loans, or compensation related to an employee's participation in political activities.
- Personal political activities must not interfere with the employee's full-time responsibilities to Intercorp Retail, nor compromise the company through statements or actions that imply organizational involvement.
- During political engagement, employees must take special care to avoid any direct or indirect association with the company, including through public statements, clothing, or any other means.
- Political campaigning or advocacy is not permitted in the workplace.

Personal Finances

Employees of Intercorp Retail are expected to manage their personal finances in accordance with their financial capacity. Each employee is responsible for ensuring that their financial activities do not conflict with their obligations to the Organization. A financial conflict of interest may arise when an employee's judgment is, or appears to be, influenced by the potential for personal financial gain.

- Employees who request or obtain loans, advances, overdrafts, or any financial resources or products from the company must strictly adhere to the agreed repayment terms.
- Employees must refrain from misusing Intercorp Retail's services, documentation, or infrastructure to carry out, promote, facilitate, or participate in personal investments or business ventures. Likewise, they must not use their position within the Organization to persuade others to engage in such activities.

Money lending between employees should be avoided; however, if such transactions occur, these are strictly personal, and the Organization bears no responsibility or involvement.

Private Investments

InterCorp Retail does not seek to restrict the private investment activities of its employees. However, employees, their spouses, or those acting on behalf of their minor children must refrain from engaging in investment transactions that could create—or appear to create—a conflict of interest between the employee and InterCorp Retail, any of its subsidiaries, affiliates, or suppliers.

Personal Relationships with Other Employees

At InterCorp Retail, we strive to maintain a workplace where employees can perform effectively and reach their full potential. We are all responsible for creating an atmosphere of trust and respect and for promoting a productive work environment.

A conflict of interest arises when you supervise, manage, or audit the work of someone with whom you have a family, romantic, or dating relationship. Family relationships include relatives by birth, adoption, marriage, domestic partnership, or civil union—such as your spouse, children, parents, siblings, grandparents, or grandchildren — as well as anyone currently living in your household, whether related or not. It may also include other close personal relationships, such as godparents. Even if your conduct is appropriate, the relationship may be perceived as influencing your judgment, which could affect team morale and workplace productivity. Therefore, you may not directly or indirectly supervise any family member or any employee with whom you have a close personal, romantic, or sentimental relationship.

Additionally, relationships as described above between employees working in different areas or stores may also generate potential conflicts due to the nature of the information handled in their respective roles. To prevent this, employees must inform the Organization, which will assist in resolving the situation without any prejudice or negative consequence to the individuals involved.

If a concern arises related to a personal relationship, you must seek guidance from your immediate supervisor or contact ConÉtica.

RELATIONSHIP WITH OUR CUSTOMERS

“We are committed to ensuring that the companies within our group provide our customers with high-quality products, accompanied by clear information, while consistently prioritizing their satisfaction and well-being.”

Product and Service Quality

The companies within our organization are dedicated to serving customers who expect quality products and services and trust that we will comply with all applicable laws and regulations regarding hygiene, quality, safety, and warranty. We are firmly committed to these principles. To achieve them, we monitor Quality Management Systems in our companies' stores, malls, warehouses, and distribution centers.

Every day, our companies must supervise and verify the quality of their products and services to maintain high standards. We must remain aware that any failure to comply with our quality assurance standards could endanger the health and safety of our customers and employees. Therefore, we must exercise great care—not only in our own tasks but also in those carried out by our colleagues and suppliers.

Advertising and Marketing

Our reputation is a valuable asset, and advertising and marketing are powerful tools for reaching our customers. Whether through media outlets, social networks, emails, online messages, or our stores, our communications influence customers' decisions about where, how, and why they choose to shop with us. As such, all communications regarding our products and services must be clear, complete, and truthful. Product labeling, advertising, and promotional materials must be accurate and appropriate, with pricing information presented transparently. We do not engage in—and firmly oppose—deceptive advertising practices.

RELATIONSHIP WITH OUR SUPPLIERS AND COMPETITORS

“We are committed to competing with determination, honesty, and integrity, to fostering long-term, fair, and impartial business relationships with all our suppliers, and to consistently honoring our commitments.”

Supplier Selection

We strive to build trustworthy and long-term relationships with our suppliers, grounded in respect for quality standards and responsible, transparent, and ethical conduct.

Supplier selection must be based on objective criteria, including integrity, quality, price, delivery performance, compliance with schedules, product suitability, reliable supply sources, sound labor practices, compliance with applicable laws, and adherence to InterCorp Retail's procurement procedures and practices.

All supplier offers must be periodically evaluated and compared to ensure continuous improvement in terms of conditions, quality, and service, without favoritism or arbitrary discrimination. Decisions must always be made in the best interest of InterCorp Retail.

Suppliers who engage in business with us must have a solid reputation and act responsibly in accordance with our standards, regulations, and legal requirements. We will not conduct business or maintain commercial relationships with individuals or organizations that deviate from labor laws, legal standards, ethical legitimacy, or that engage in illicit activities.

Money laundering involves disguising funds or assets obtained through illegal activities as appearing to come from lawful activities so they can circulate freely in the financial system.

At InterCorp Retail, we are committed to strict legal compliance and to identifying any situation that may constitute a criminal offense. Accordingly, we categorically reject any activity related to money laundering. Illegal activities associated with money laundering include terrorism, trafficking of illegal drugs, fraud, bribery, smuggling, and theft

All employees must avoid becoming involved in arrangements or transactions that could be—or appear to be—linked to assets of criminal origin. If there is any doubt regarding payments or transactions that might raise red flags, it must be reported to the Legal Department.

Personal and Social Relationships

Our suppliers are valued business partners, and as such, we must treat them with respect, fairness, and integrity. We must not misuse InterCorp Retail commercial influence to take undue advantage over any supplier. Likewise, we must expect our suppliers to comply with all applicable legal requirements in their business practices.

As employees, it is advisable to avoid any situation involving suppliers or potential suppliers that could be perceived as creating a conflict of interest or compromising our independence of judgment and our responsibility to make business decisions freely. We base our relationships with suppliers on efficient, fair, and lawful business practices.

Invitations to activities such as training courses, trips, celebrations, receptions, sporting or entertainment events, contests, and similar engagements should preferably be declined. If you find yourself exposed to such situations, you must act in accordance with the specific policies governing these matters.

Under no circumstances may we imply, request, or demand gifts or benefits as a condition for establishing business relationships with suppliers.

If you believe that your relationship with a supplier may be perceived as overly close, or that it might appear you are exerting commercial influence over them, or if you have any doubts regarding these matters, you should consult your immediate supervisor or contact the ConÉtica program's support channels.

Relationship with Our Competitors

We believe in strong yet fair competition, and we support the development of appropriate legislation in this area. We conduct our operations based on the principles of fair and ethical competition, in full compliance with all applicable regulations.

RELATIONSHIP WITH OUR INVESTORS

"We are committed to conducting business transparently and honestly, aiming to generate maximum value for the company in a sustainable way."

At InterCorp Retail, we are dedicated to creating long-term value for the Organization, its stakeholders, and delivering returns to shareholders— all within a framework of strict compliance with the law, internal regulations, and codes, and guided by ethical, honest, and transparent conduct.

We recognize the trust our investors have placed in us. Therefore, our accounting records and supporting documentation must accurately describe and reflect the true nature of the underlying transactions. This information must be complete, reliable, timely, and on a regular basis, ensuring that it faithfully represents our operations, structure, performance, and financial position. We will not establish or maintain any unrecorded or undisclosed accounts, funds, or assets.

Any act that goes against these principles must be reported immediately.

RELATIONSHIP WITH THE AUTHORITIES

"We are committed to carrying out our dealings with the State in a transparent manner, strictly adhering to the procedures established by law, and cooperating fully with the authorities when legitimately requested."

Intercorp Retail is fully committed to cooperating with lawful requests from authorities with transparency, integrity, and efficiency, and in full compliance with the legal standards.

Employees who represent the Organization in dealings with local or foreign authorities are strictly prohibited from offering, promising, giving, requesting, or accepting bribes, irregular payments, or any compensation not expressly permitted by law, as well as from engaging in any act considered corrupt. Likewise, employees may not use third parties or entities to channel bribes to public officials through contracts, purchase orders, or agreements with Intercorp Retail, whether directed at public officials, business partners, or their relatives.

Any act of bribery or corruption involving public officials is punishable by law and is contrary to the principles of fair and open competition, to which Intercorp Retail is firmly committed.

We reject all forms of corruption. All of our business activities are subject to anti-bribery and anti-corruption laws and policies. Giving or receiving bribes or secret payments, or engaging in fraudulent or unauthorized activities, is strictly prohibited and subject to disciplinary action.

We are dedicated to operating with transparency and integrity, and we do not tolerate any form of undue influence through payments, bribes, or unethical conduct by suppliers or customers. Any such behavior must be reported immediately.

RELATIONSHIP WITH THE COMMUNITY AND THE ENVIRONMENT

"We strive to promote the well-being of community members through a vision of sustainable development, encouraging collaborative practices that raise environmental awareness and operating with a commitment to minimizing any negative impact on the environment."

Sustainability

At Intercorp Retail, we recognize that the sustainable development of our company is essential to its long-term success. For this reason, we embrace corporate social responsibility and use tools such as sustainability reports to ensure that our practices take into account both environmental and our community considerations. Our goal is to create shared value while meeting the needs of all our stakeholders.

Environmental Responsibility

We are a company committed to environmental protection and the conservation of natural resources. Accordingly, the operations of our affiliated companies are designed to minimize any potential negative impact on our surroundings. We proactively implement initiatives that foster environmental awareness among our employees and the broader community, while innovating and providing tools that support the sustainable development of our country.

We must also act responsibly toward the environment to ensure compliance with environmental laws and regulations, promote a better quality of life, and help ensure a better world for future generations.

Commitment to Our Community

As an integral part of society, we strive to be a trustworthy corporate citizen and to fulfill our responsibilities to the communities where we operate. We consider our employees, customers, suppliers, and neighbors as part of our community.

Given the diversity of this group, we develop and implement a range of initiatives and projects aimed at working collaboratively to enhance their well-being. By doing so, we seek to strengthen mutually beneficial practices, ensuring a close relationship based on commitment, collaboration, and a sustainable spirit of partnership over time.

Statements to the Media

Communication in the age of social media has transformed the way we live and work. During public events or when individuals seek information about the Organization, we as employees may be perceived as sources of such information. However, as a company, Intercorp Retail must ensure the accuracy of all information shared through public statements across any media outlet, including television, radio, digital platforms, newspapers, magazines, trade publications, and other media. For this reason, the General Management will appoint a designated spokesperson who will be solely responsible for speaking about and on behalf of the Organization.