



**GRI Table of Contents**  
**Annual Report 2021**





GENERAL DISCLOSURES			
GRI Standard	General Reporting Aspects	Annual Report (pages)	Comments
102-13	Compile a list of the main memberships of industry-related or other associations, and national or international advocacy organizations to which the Organization belongs.	14	
102-14	Statement from the Organization's most senior decision-maker regarding the importance of sustainability to the Organization and its strategy for addressing such	10, 12	Webpage: Corporate Governance/ Sustainability and Corporate Governance Committee: <a href="https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/">https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/</a>
102-15	Describe the key impacts, risks and opportunities	12, 87	
102-16	Describe the Organization's values, principles, standards and norms, such as codes of conduct or codes of ethics	83	
102-17	Describe the internal and external mechanisms for reporting concerns and seeking advice on ethical and lawful conduct as well as for matters related to the Organization's integrity	87	
102-18	Describe the Organization's governance structure, including committees of the highest governance body	26, 88	
102-19	Describe the process for delegating authority for economic, environmental, and social topics from the highest governance body to senior executives and other specific employees.		Webpage: Corporate Governance/ Sustainability and Corporate Governance Committee: <a href="https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/">https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/</a>
102-20	Indicate whether the Organization has appointed an executive-level position or positions that are responsible for economic, environmental, and social topics	28	
102-21	Describe the consultation processes between stakeholders and the higher governance body with respect to economic, environmental and social issues	30	Stakeholder consultations are coordinated between different governing bodies of both Grupo SURA and its subsidiaries, depending on the specific stakeholder. The areas that maintain the most contact with our stakeholders are: Capital Markets and Investor Relations  Communications and Corporate Identity Management  Human Talent  Corporate Citizenship Management
102-22	Describe the structure of the Organization's highest governance body and its committees	26, 90	

GENERAL DISCLOSURES			
GRI Standard	General Reporting Aspects	Annual Report (pages)	Comments
102-23	Indicate whether the person chairing the highest governance body also holds an executive position	26, 90	Webpage: Corporate Governance / Board of Directors <a href="https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/">https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/</a>
102-24	Describe the processes for appointing and selecting the highest governance body and its committees	90	Webpage: Corporate Governance / Board of Directors <a href="https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/">https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/</a>
102-25	Describe the processes by which the highest governance body prevents and manages potential conflicts of interest	83	Webpage: Corporate Governance / Board of Directors <a href="https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/">https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/</a>
102-26	Describe the highest governance body's and senior executives' roles in the development, approval, and updating of the Organization's purpose, value or mission statements, strategies, policies, and goals related to economic, environmental, and social impacts	90	Webpage: Corporate Governance / Board of Directors <a href="https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/">https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/</a>
102-27	Indicate which measures have been taken to develop and enhance the highest governance body's collective knowledge of economic, environmental, and social topics.	85	
102-28	Describe the processes for evaluating the highest governance body's performance with respect to governance of economic, environmental, and social topics. Indicate whether such evaluation is independent or not, and how often it is carried out.	90	Webpage: Corporate Governance / Board of Directors <a href="https://www.gruposura.com/wp-content/uploads/2020/06/grupo-sura-informe-evaluacion-pwc-2019.pdf">https://www.gruposura.com/wp-content/uploads/2020/06/grupo-sura-informe-evaluacion-pwc-2019.pdf</a>
102-29	Describe the role of the highest governance body's role in identifying and managing economic, environmental, and social topics and their impacts, risks, and opportunities	90	Webpage: Corporate Governance/ Sustainability and Corporate Governance Committee: <a href="https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/">https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/</a>
102-30	Describe the highest governance body's role in reviewing the effectiveness of the Organization's risk management processes for economic, environmental, and social topics.	85	Webpage: Corporate Governance/ Sustainability and Corporate Governance Committee: <a href="https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/">https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/</a>
102-31	Indicate how often the highest governance body reviews economic, environmental, and social topics and their impacts, risks, and opportunities.		Webpage: Corporate Governance/ Sustainability and Corporate Governance Committee: <a href="https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/">https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/</a>
102-32	Indicate the highest committee or position that formally reviews and approves the Organization's sustainability report and ensures that all material topics are covered	-	The Board of Directors is the governing body in charge of reviewing and approving the Company's sustainability report.

GENERAL DISCLOSURES			
GRI Standard	General Reporting Aspects	Annual Report (pages)	Comments
102-33	Describe the process for communicating critical concerns to the highest governance body.	85, 90	Webpage: Corporate Governance / Board of Directors <a href="https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/">https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/</a>
102-34	Indicate the total number and nature of critical concerns that were communicated to the highest governance body; also describe the mechanism(s) used to address and resolve such critical concerns.	85	
102-35	Describe the remuneration policies for the highest governance body and senior executives	93	
102-36	Describe the processes for determining remuneration	93	
102-37	Explain how stakeholder views on remuneration are sought and taken into account, including, where appropriate, the results of votes on remuneration policies and proposals.	90	
102-38	Total annual compensation ratio	-	This information is not reported given its confidential nature
102-39	Percentage increase in the annual total compensation ratio	-	This information is not reported given its confidential nature
102-40	Compile a list of stakeholders that are engaged by the Organization	29	
102-41	Collective bargaining agreements Freedom of association	Annex - Human Talent Management	
102-42	Indicate the basis for identifying and selecting stakeholders with whom to engage	66	
102-43	Describe the Organization's approach to stakeholder engagement	66	Grupo SURA engages with its stakeholders through different liaising channels in order to build a two-way relationship that leverages both the Organization's growth and its contribution to society.
102-44	Identify key topics and concerns that have been raised through stakeholder engagement and describe how the Organization has evaluated those key topics and concerns, including through its reporting	66	
102-45	Entities included in the Organization's consolidated financial statements or equivalent documents, and which are not included in the scope of the current report	11	

GENERAL DISCLOSURES			
GRI Standard	General Reporting Aspects	Annual Report (pages)	Comments
102-46	Describe the process followed to determine the content of this report and the coverage of each aspect	11	Our annual report includes all those material issues that were identified in the Materiality Analysis performed on Grupo SURA
102-47	Compile a list of the material topics that were identified during the process of defining the contents of the Materiality Disclosures report	30	
102-48	Describe the effect of any restatements of information given in previous reports, and the reasons for such restatements.		There were no restatements of information in 2021.
102-49	Indicate any significant changes in the scope and coverage of each aspect compared to that stated in previous reports		There were no changes made in 2021 to the previously provided information.
102-50	Reporting period	-	Sustainability reports are drawn up every year, and this report corresponds to the period January 1st to December 31, 2021.
102-51	Date of most recent report (if applicable)	-	March 2021
102-52	Reporting cycle	-	Annual
102-53	Provide a point of contact to resolve any questions that may arise regarding the contents of this report	-	Should you have any comment to make or wish to request additional information, please contact Juan Fernando Rojas Trujillo - Content Director for Grupo SURA, at <a href="mailto:jfrojas@gruposura.com.co">jfrojas@gruposura.com.co</a>
102-54	Indicate which "compliance" option the Organization has chosen to follow:	-	This report has been prepared in accordance with the GRI Standards: Core option
102-55	GRI content index	-	Annexes
102-56	External assurance	-	Annexes

BASIC SPECIFIC CONTENT - MATERIAL TOPICS			
GRI Standard	Name	Annual Report (Pages)	Comments
<b>Corporate Governance - Transparency - Business Ethics.</b>			
103-1	Explanation of the material topic and its boundaries	82	
103-2	Management approach and its components	83	
103-3	Evaluation of management approach	82	
205-1	Operations assessed for risks relating to corruption	87	100% of all risk operations are evaluated in accordance with Grupo SURA's risk matrix. The significant corruption-related risks identified through the risk assessment are as follows: <ul style="list-style-type: none"> <li>- Acts of corruption in M&amp;A operations.</li> <li>- Acts of corruption with public officials.</li> <li>- Acts of corruption or bribery through contributions (donations, sponsorships or amounts awarded) to third parties.</li> </ul>
205-2	Communication and training on anti-corruption policies and procedures	87	No training was provided to the Company's governing bodies The percentage of business partners (suppliers and service providers) to whom policies have been communicated, broken down by region, is not included, as this information is not available at this time, but it is expected to be made available for future reports. Only the total number of employees trained and made aware of these procedures were reported together with the number of business partners that were duly informed of such.
205-3	Confirmed incidents of corruption and actions taken	87	Webpage: Corporate Governance / Ethical Conduct <a href="https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/">https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/</a>
419-1	Failure to comply with applicable legislation and regulations governing social and economic issues	87	Webpage: Corporate Governance / Ethical Conduct <a href="https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/">https://www.gruposura.com/nuestra-compania/etica-y-gobierno-corporativo/</a>
<b>Capital allocation</b>			
103-1	Explanation of the material topic and its boundaries	49 - 60	
103-2	Management approach and its components	49 - 60	
103-3	Evaluation of management approach	49 - 60	
<b>Human talent management - Labor practices</b>			
103-1	Explanation of the material topic and its boundaries	69 - 74	
103-2	Management approach and its components	69 - 74	
103-3	Evaluation of management approach	69 - 74	

BASIC SPECIFIC CONTENT - MATERIAL TOPICS			
GRI Standard	Name	Annual Report (Pages)	Comments
202-1	Ratios of standard entry-level wage by gender and compared to local minimum wages in all those countries where the Organization has significant operations	Annex - Human Talent Indicators Report	Generally speaking, the minimum wage paid out by the Organization exceeds the minimum wage established by the Governments of all those countries where SURA is present.  Significant operations reported are those whose number of employees is more than 5% of the total number employed by the Business Group. Consequently, this is reported as the total indicator, specifically for Chile, Colombia and Mexico.
401-1	Total number and rate of new employee hires and average turnover by age group, gender and region	Annex - Human Talent Indicators Report	Webpage - Human Talent and Culture <a href="https://www.gruposura.com/nuestra-compania/talento-humano-y-cultura/">https://www.gruposura.com/nuestra-compania/talento-humano-y-cultura/</a>
401-2	Benefits provided to full-time employees	-	Webpage - Human Talent and Culture <a href="https://www.gruposura.com/nuestra-compania/talento-humano-y-cultura/">https://www.gruposura.com/nuestra-compania/talento-humano-y-cultura/</a>
403-1	Percentage of workers who are represented by formal health and safety committees made up of management and employee representatives, so as to help monitor and advise on occupational health and safety programs.	-	100% of the Business Group's employees are represented at the health and safety committees, formally established in each of the Companies, so as to help control and advise on occupational health and safety programs.
404-1	Average hours of training per year per employee, broken down by gender and by job category	Annex - Human Talent Indicators Report	Webpage - Human Talent and Culture <a href="https://www.gruposura.com/nuestra-compania/talento-humano-y-cultura/">https://www.gruposura.com/nuestra-compania/talento-humano-y-cultura/</a>  The indicator for 2021 includes the skills and proficiency development initiatives and, in addition, SURA AM has begun to compile this indicator as Suramericana and Grupo SURA already do, taking into account total training provided to employees, whether these were active or inactive at the end of the year.
404-2	Programs for upgrading employee skills and continuous training to facilitate their continued employability and the management of career endings.	Annex - Human Talent Indicators Report	Webpage - Human Talent and Culture <a href="https://www.gruposura.com/nuestra-compania/talento-humano-y-cultura/">https://www.gruposura.com/nuestra-compania/talento-humano-y-cultura/</a>
405-1	Diversity of governance bodies	89	
419-1	Cost of significant fines and number of non-monetary sanctions for failure to comply with environmental regulations.	-	At the end of 2021, Grupo SURA had not incurred any fines or sanctions for failing to comply with economic and social legislation and regulations.
DJSI 3.7.2	Absenteeism rate	Annex - Human Talent Management	The Group reported: -Absenteeism rate: this is calculated based on individual sick days due to common illnesses as well as occupational accidents. This does not include scheduled or permitted absenteeism such as vacations, study time, maternity or paternity leave, etc.

BASIC SPECIFIC CONTENT - MATERIAL TOPICS			
GRI Standard	Name	Annual Report (Pages)	Comments
<b>Reputation, branding and stakeholder engagement</b>			
103-1	Explanation of the material topic and its boundaries	20	
103-2	Management approach and its components	20	
103-3	Evaluation of management approach	20	
<b>Client welfare</b>			
103-1	Explanation of the material topic and its boundaries	2-22	
103-2	Management approach and its components	2-22	
103-3	Evaluation of management approach	2-22	
<b>Sustainable Finance</b>			
103-1	Explanation of the material topic and its boundaries	23-27	
103-2	Management approach and its components	23-27	
103-3	Evaluation of management approach	23-27	
DJSI 3.8.2	Financial Inclusion Measurement & Impact	Annex: Education and financial inclusion.	The Group reported: - Quantitative KPIs for measuring the social and commercial impact of its financial inclusion initiatives, as follows: Financial inclusion: Providing tools so that companies and people (with a focus on inclusion and diversity not just for those in the lower income brackets) can access useful, top-quality and affordable financial products and services that meet their needs and create wellbeing. Information is reported on the number of beneficiaries of these inclusion programs and the income generated by these.
<b>Social Investment - building democracy and instilling a sense of citizenship.</b>			
103-1	Explanation of the material topic and its boundaries	63 - 65	
103-2	Management approach and its components	63 - 65	
103-3	Evaluation of management approach	63 - 65	
<b>Climate change</b>			
103-1	Explanation of the material topic and its boundaries	26-28	Website - Climate Change <a href="https://www.gruposura.com/sostenibilidad/capital-natural/">https://www.gruposura.com/sostenibilidad/capital-natural/</a>
103-2	Management approach and its components	26-28	Website - Climate Change <a href="https://www.gruposura.com/sostenibilidad/capital-natural/">https://www.gruposura.com/sostenibilidad/capital-natural/</a>

BASIC SPECIFIC CONTENT - MATERIAL TOPICS			
GRI Standard	Name	Annual Report (Pages)	Comments
103-3	Evaluation of management approach	26-28	Website - Climate Change <a href="https://www.gruposura.com/sostenibilidad/capital-natural/">https://www.gruposura.com/sostenibilidad/capital-natural/</a>
201-2	The financial implications of climate change and other associated risks and opportunities	26-28	Website - Climate Change <a href="https://www.gruposura.com/sostenibilidad/capital-natural/">https://www.gruposura.com/sostenibilidad/capital-natural/</a>
302-1	Energy consumption within the Organization	Annex - Environmental management indicators:	<p>Website - Climate Change <a href="https://www.gruposura.com/sostenibilidad/capital-natural/">https://www.gruposura.com/sostenibilidad/capital-natural/</a></p> <p>Total energy consumption within the organization is reported in MWh and not in joules or multiples. Only total energy is reported.</p> <p>Energy sold for electricity, heating, cooling and/or steaming purposes does not apply to Grupo SURA.</p> <p>The GHG Protocol methodology is used for this calculation along with the emission factors from this same source.</p> <p>Fuels consumed by the Group's own vehicle fleets, refrigerants and power plants are taken into account.</p>
302-4	Reduction in energy consumption	-	This indicator is not reported. Only reductions in carbon emissions are reported (305-5)
303-3	Water withdrawn by source	Annex - Environmental management indicators:	<p>Webpage - Climate change <a href="https://www.gruposura.com/sostenibilidad/capital-natural/">https://www.gruposura.com/sostenibilidad/capital-natural/</a></p> <p>Water extraction is reported. The Company only uses water from water mains and consumption levels are measured through its own meters installed at each site. The total water extraction (in megaliters) in water-stressed zones and the breakdown (in megaliters) per water source (fresh water, other types of water) are not reported.</p>
305-1	Direct (scope 1) GHG emissions	79	<p>Webpage - Climate change <a href="https://www.gruposura.com/sostenibilidad/capital-natural/">https://www.gruposura.com/sostenibilidad/capital-natural/</a></p> <p>Base year: 2019. This has been selected since the data is only comparable from this year onwards, due to the sources included.</p> <p>This takes into account the following gasses: CO2, CH4 and N2O</p> <p>Sources of information on emission factors: GHG Protocol for all countries For Colombia: UPME</p>

BASIC SPECIFIC CONTENT - MATERIAL TOPICS			
GRI Standard	Name	Annual Report (Pages)	Comments
			For Mexico: Government of Mexico - General Coordination of Climate Change and Low Carbon Development.
305-2	Indirect (scope 2) GHG emissions	79	<p>Webpage - Climate Change <a href="https://www.gruposura.com/sostenibilidad/capital-natural/">https://www.gruposura.com/sostenibilidad/capital-natural/</a></p> <p>Base year: 2019. This has been selected since the data is only comparable from this year onwards, due to the sources included.</p> <p>Sources of information on emission factors:  Argentina: Ministry of Energy and Mining  Brazil, Panama: Emission Factors.  Chile: National Energy Commission  Mexico: Mexican Government  Dominican Republic: National Council for Climate Change, the DR Government.  Uruguay: BEN - National Energy Balance.  Colombia: Own calculations</p>
305-3	Indirect (scope 3) GHG emissions	79	<p>Webpage - Climate Change <a href="https://www.gruposura.com/sostenibilidad/capital-natural/">https://www.gruposura.com/sostenibilidad/capital-natural/</a></p> <p>In 2021, the emissions corresponding to the means of transport used by employees on their home-work-home commute in the case of Suramericana were not calculated, as due to the definitions relating to flexible work arrangements, this was not considered to be material. For this reason, the 2020 Scope 3 footprint is not comparable to the 2021 footprint, which is why it was not included in the report.  The base year is 2019.  Source of emissions factor: GHG Protocol.</p>
305-5	Reductions in GHG emissions	80	
306-2	Total weight of waste classified as to type and disposal method	Annex - Environmental management indicators:	<p>Webpage - Climate Change <a href="https://www.gruposura.com/sostenibilidad/capital-natural/">https://www.gruposura.com/sostenibilidad/capital-natural/</a></p> <p>The total weight of waste generated, recycled and disposed of is reported, however the total weight of hazardous and non-hazardous waste broken down by disposal method is not being included: i. Reuse ii. Recycling iii. Composting iv. Recovery, including energy recovery v. Incineration (mass burn) vi. Deep well injection vii. Landfill viii On-site storage ix. Others (to be specified by the Organization) . The manner in which it has been decided to manage waste is not reported.</p>

<b>BASIC SPECIFIC CONTENT - MATERIAL TOPICS</b>			
<b>GRI Standard</b>	<b>Name</b>	<b>Annual Report (Pages)</b>	<b>Comments</b>
307-1	Significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations	-	At the end of 2021, Grupo SURA had not been fined or sanctioned for failing to comply with economic and social legislation and regulations.
<b>Shareholder value.</b>			
103-1	Explanation of the material topic and its boundaries	3-14	
103-2	Management approach and its components	3-14	
103-3	Evaluation of management approach	3-14	
<b>Solvency and financial management.</b>			
103-1	Explanation of the material topic and its boundaries	3-14	
103-2	Management approach and its components	3-14	
103-3	Evaluation of management approach	3-14	
<b>Human rights.</b>			
103-1	Explanation of the material topic and its boundaries	62	
103-2	Management approach and its components	62	
103-3	Evaluation of management approach	62	
412-1	Operations that have been subject to human rights reviews or impact assessments	62	
<b>Research and development.</b>			
103-1	Explanation of the material topic and its boundaries	23-28	
103-2	Management approach and its components	23-28	
103-3	Evaluation of management approach	23-28	