

CODE OF CONDUCT FOR SUPPLIERS

Grupo Empresarial SURA

Our common purpose is to build Value and Trust.

Compliance

This document is a framework of Grupo Empresarial SURA's Code of Conduct.

Full awareness of this Code is a prior requisite for any contract entered by and between the Companies of Grupo Empresarial SURA. By signing the contract and accepting the purchasing order, the Supplier warrants and can vouch that its operations are subject to the provisions included hereto.

The Companies may, either directly or through third parties, follow-up and assess its activities if Grupo Empresarial SURA is aware of any irregular action demanding corrective measures.

Our Target

Grupo Empresarial SURA established a number of specific principles that should be expressly accepted by Suppliers and attached to the respective contracts. Any breach of the actions contained hereto can lead to sanctions and in turn to the termination of the contractual relations as provided in this Code, the internal guidelines of the Companies and the regulations in force.

This document extends to every affiliate and subsidiary of Grupo Empresarial SURA and establishes several minimum non-negotiable standards which our suppliers must adhere to, notwithstanding where they produce goods or provide services. It is expected that those who are covered by the provisions expressed in this Code, can uphold the local applicable regulations and all other legal standards in force; and in terms of legal provisions and this Code, those providing the highest protection shall apply.

Our Actions, Our Value

Suppliers are essential to our activities and by working together we share risks and

create opportunities. Hence, it is paramount to establish a work philosophy that sheds light on responsible actions.

When we do things well keeping in mind our common purposes, we create value in our relations, build trust and contribute to a better setting for all.

By acting with RESPECT, RESPONSIBILITY, FAIRNESS AND TRANSPARENCY, we give life to the commitments set forth in this Code of Conduct as well as the Internal Work Regulation, the internal guidelines of the Companies and the regulations in force.

Ethical commitment

Ethical performance has zero tolerance and is not an option but instead plays a comprehensive role in our business. This Code does not establish particular matters about every subject but instead, stems from the reader's sound judgment. In the event of any doubt, the reader should ask:

- Does this situation make me feel uncomfortable?
- Does this situation feel improper to me?
- Do I feel these actions go hand-in-hand with the ethical principles established in this Code?
- Would my performance have a negative effect on others?
- How would I feel if I had to describe my performance to others?
- Which would be the consequences of my performance regarding the company and society?

Individual behavior has an impact on collective behavior and hence, upholding to a conduct that meets our Corporate Principles contributes to manage risks, to corporate coherence and has a positive impact on corporate dynamics.

Our Primary Principles

Fairness

Fairness is understood as a fair and equitable treatment in labor, commercial and/or civic relations. Fair treatment for all people no matter their social, economic, racial, sexual and gender conditions.

Respect

Acknowledging others and accepting them just the way they are. Beyond the legal compliance with the regulations and the agreements entered, this keeps in mind the points of view, needs and opinions of the parties.

Responsibility

The clear intention of upholding all commitments by securing the goods of the Corporation and of its stakeholders.

Transparency

The relations of the Corporation are based on knowledge and access to information, within the boundaries of the law and under business confidentiality.

Long-term relations

We believe in and promote long-term relations. We reject doing business with individuals or corporations known for their social and corporate performance against the law, ethics and good practices, or whose legal standing or reputation are disputed.

Our suppliers

At Grupo SURA, suppliers are individuals or corporations which provide goods or services to the Companies to fulfill organizational purposes.

All of our negotiations are conducted under our Corporate Principles, upholding

ethical, environmental and social criteria, aimed to uphold the rights and duties of the parties. Hence, the Companies have internal policies to handling their suppliers, which go hand-in-hand with the guidelines of this Code.

Business practices - Actions with conviction

How we gain results is as important as the results themselves. Consequently, establishing clear rules of behavior when facing issues that impact business management is necessary to guarantee coherence at all levels of Grupo Empresarial SURA.

1. Money laundry, fraud, corruption and bribe prevention

We have a zero tolerance policy of fraud and as such, no relations based on inappropriate payments, promises and other economic, employment and other benefits may influence a decision-making process or privilege personal interests.

Our business actions do not tolerate practices which hinder transparent and lawful interactions among people, companies and institutions of the public and private sector.

2. Human Rights

We are committed to uphold Human Rights in every step of our businesses and to remedy those situations in which this respect was breached in any way by us. We are not accessories to vulnerabilities or affect the business activities in which we participate.

We uphold cultural diversity and encourage fair treatment while we actively participate in social development processes.

3. Labor rights

We are committed to comply with the Principles, Conventions and Recommendations of the International Labour Organization – ILO. We have zero tolerance for child labor, forced labor or conditions which go against the dignity, health and safety of employees or advisors.

Our suppliers shall create working conditions which meet our standards, promote fair compensation and establish sound practices in terms of development, work

safety, social security and training.

We uphold the right to association and oversee healthy coexistence.

4. Equal opportunities and non-discrimination

Workers shall choose a job in a manner that is free, fair, with dignity and respect. Our suppliers shall reject any discrimination whatsoever in terms of employment and occupation. Discrimination is understood as any distinction, exclusion or preference based on race, color, sex, sexual orientation, religion, public opinion, nationality and social origin, disease, age, disability, family responsibilities, and Union affiliation or activities.

5. Upholding the Law

We comply with the laws that rule our industry, the internal regulations of the Companies and the settings in which we carry out our corporate activity, procuring that those who we relate to also meet the above.

6. Conflicts of interest

Privilege is given to common interests over personal interests; we do not commit the integrity of our actions to obtain personal benefits and hence, we avoid any situation representing a conflict of interest in commercial and labor relations related to access to privileged information, capability to influence a decision, economic ties, among others.

7. Acquisition of goods and services

The Companies have internal policies and guidelines provided to their employees and the public at large, related to purchase and hiring services. The duty of suppliers is to remained informed and to meet these guidelines, refraining from contracting in the event of any doubt.

For more information, refer to the Suppliers' Management Manual.

8. Gifts and entertainment

We recognize that gifts and entertainment may be given in the normal course of business for the purpose of strengthening business relations. However, since this could well compromise or affect the criteria on which the recipient bases his or her decision, our suppliers and service providers must abstain from providing Company staff with such items.

Should our staff receive any gift or form of entertainment, he or she must inform the Ethics Committee or the body responsible for such function for the purpose of evaluating the situation and deciding what to do with the item.

Notwithstanding the foregoing, and for the sole purpose of facilitating our business dealings, we do allow our employees to accept invitations to attend academic events (conferences, seminars, training programs, etc.) or other events staged with the aim of getting to know the Company or a product offered by a third party. In such cases, the employee or officer must inform or be duly authorized by his or her superior, who shall consult the Ethics Committee when in doubt.

9. Environment

We acknowledge the importance of joining efforts to care for the environment and developing strategies to mitigate the effects of climate change is paramount for sustainability. Our suppliers shall uphold the most stringent compliance of the applicable rules and laws, and at as responsibly and consciously as possible with their surroundings.

10. Free competition

We do not participate in situations which undermine free competition nor create monopolies.

11. Companies' resources

We are responsible for the proper use of the Companies' resources, including equipment, systems and other tangible or intangible goods such as information,

specialized knowledge or other procedures related to the job. No equipment, systems or services may be used inappropriately or for any purpose which goes against the law or internal procedures, or puts at risk the reputation of the Companies or of third parties.

Information care, use and disclosure

Confidential or Privileged information is related to information that is owned by the Companies related to their products, processes, customers, collaborators, shareholders or suppliers, which is not public or is not expressly available to third parties.

The information provided by suppliers is protected under the highest confidentiality standards and applicable regulations in force, and is solely provided to third parties for legal requirements or part of the service provided convened, including confidentiality clauses.

Our suppliers shall act hand-in-hand with these guidelines, overseeing the security of the corporate and customers' information.

Copyright and Intellectual Property

The knowledge management and intellectual production rising from the course of the business shall uphold the corporate and legal provisions related to intellectual property and copyright. Grupo SURA does not allow the use of software or technological tools which do not meet legal licensing processes.

For more information, refer to the Intellectual Property Management Policy of Grupo Empresarial SURA.

Code of Conduct management

Overseeing the compliance of the Code of Conduct is everybody's responsibility and hence, all employees, advisors, suppliers, customers, shareholders, investors

and stakeholders have channels to report any situation which goes against the contents of this document.

1. Ethics Committees

The Companies shall have Ethics Committees which consist of an odd number of members as provided in the internal regulations of the each Committee.

2. Ethics Hotline

The Companies shall have an Ethics Hotline which is a confidential and safe communications channel used to report possible irregularities which go against the ethical principles of the Companies. These cases shall be analyzed by the Ethics Committee of each Company.

3. Principle of anonymity and non-retaliation

The Ethics Committees shall maintain full reservation of the identification of the person providing information. Complaints may be made anonymously or directly. In the investigation processes, non-transparency of information is deemed as well as a breach of this Code.

4. Sanctions

Irregularities committed may lead to sanctions and even to the termination of the contractual relation. The above takes place without prejudice of the legal actions of civil or criminal liability which may derive.

The sanctions made by the Companies shall uphold the right to defense of the persons involved.

**WE HAVE ZERO TOLERANCE FOR UNETHICAL BEHAVIOR
ETHICS ARE AN INTEGRAL PART OF EXERCISING OUR BUSINESSES.**

Grupo Empresarial SURA signed the U.N. Global Compact initiative which promotes sustainable development to implement 10 corporate management principles in the areas of Human Rights, Labor Standards, Environment and Transparency.

Human Rights

Principle 1: Support and respect the protection of internationally proclaimed Human Rights.

Principle 2: Make sure they are not complicit in Human Rights abuses.

Labour Standards

Principle 3: Uphold the freedom of association and collective bargaining.

Principle 4: Elimination of forced and compulsory labour.

Principle 5: Abolition of child labor.

Principle 6: Elimination of discrimination in respect of employment.

Environment

Principle 7: Support a precautionary approach to environmental challenges.

Principle 8: Undertake initiatives to promote greater environmental responsibility.

Principle 9: Encourage environmentally friendly technologies.

Anti-corruption

Principle 10: Work against any corruption in all its forms, including extortion and bribery.

We encourage our suppliers and contractors to act with responsibility and ethics, and to uphold the highest corporate standards honoring them throughout their supply chain.

ETHICAL COMMITMENT OF SUPPLIERS

Grupo Empresarial SURA

Grupo Empresarial SURA is committed to long-term relations, to processes that favor collective growth, and to common good and sustainability. Consequently, it acknowledges that its Suppliers are pivotal allies to meet its corporate purpose.

Competitiveness is achieved by developing responsible practices which qualify corporate dynamics, which give way to meet the expectations of different stakeholders and to adapt to changes in the setting. SURA wants to add wills and to build a joint commitment with its suppliers.

We invite you to be part of this commitment so that together we can be part of the consolidation of practices which allow us to be in force in the future.

We commit to comply with the Code of Conduct and the Suppliers Management Manuals of Grupo Empresarial SURA, and to disclose them among our employees.

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