

INTEGRATED SUPPLIERS AND PURCHASING MANAGEMENT POLICY

—Grupo SURA—

Introduction

The purpose of this policy is to determine the framework for management and relations between Grupo SURA and its affiliates, and the suppliers to facilitate the process for purchasing and managing goods and services.

Suppliers are a key part of a company's performance, affect the way in which they keep the promise of value, and competitiveness. Developing responsible practices that create trust and help sustainability, knowledge creation, exchange of experiences and continuous improvement of the suppliers is an indispensable requirement.

Scope and framework for application

A supply is defined as an individual or legal entity that provides goods or services to support the company's operations. The supply chain consists of the suppliers and negotiators involved directly or indirectly with the organizations.

This Supplier and Purchasing Management Policy applies to Grupo SURA, Suramericana, SURA Asset Management and each one of their affiliates in those countries where they are present. Depending on the specific circumstances of the business, attachments may be added to complement the policy.

Guidelines

- 1.** Integral supplier and purchasing management must go through the following phases:
 - Selection: evaluation of criteria and mechanisms to include suppliers. It involves registration, categorization, analysis and contracting.
 - Participative management: application of relationship mechanisms that enable two-way interaction.
 - Evaluation: verify that the criteria defined by the company for its relations with the suppliers are met.
 - Development and strengthening: defining supplier management as a contribution to business dynamics.
- 2.** In addition to the criteria of quality, timeliness and price, the following will be considered during the acquisition of goods and services:
 - Ethical behavior
 - compliance with laws and regulations
 - environmental, social, and corporate governance practices
 - impact on risk management
- 3.** Business relations must protect and guarantee the rights of the suppliers, and ensure that they discharge their duties.

4. The purchase of goods or services must adhere to the process described in the Suppliers and Purchasing Manual.
5. Employees may not be suppliers of goods or services.
6. Negotiations will be free from conflicts of interest or actions that affect decisions that go against transparency in the business. In the event of a conflict of interest, it must be disclosed first to the immediate superiors and secondly, it was reported through each company's ethics hotline. For Grupo SURA: lineaetica@gruposura.com.co; Suramericana S.A: lineaetica@sura.com.co; and Sura Asset Management lineaetica@sura-am.com

Governance

Each company will define the area responsible for implementing and complying with this policy. In addition, committees will be created with members from different areas in each company to consolidate the process in accordance with the corporate objectives of competitiveness and relationship building.

Decision-making instances

The party responsible for analyzing and approving the acquisition of a good or service will be defined according to the cost of the transaction.

Dissemination and updates

This policy will be disseminated to all employees in all the companies, and will be updated according to organizational changes, legal provisions, or other aspects it might affect the guidelines proposed herein. The control and compliance areas will ensure that the policy is properly implemented.
