

## **SUPPLIERS AND PURCHASING MANAGEMENT POLICY**

### **Introduction**

The purpose of this policy is to define a framework for management and for the relations among Grupo SURA and its affiliates, and the suppliers to facilitate the process for acquiring goods and hiring services and its management.

Suppliers are a key part of a company's performance, influence how the value promise is kept and competitiveness. Therefore, it is indispensable to have responsible practices that build confidence and help sustainability, knowledge, exchanging experiences and continuous improvement.

### **Scope and framework for application**

A supplier is defined as an individual or legal entity that provides goods or services to support the Company's operation. The supply chain consists of those suppliers and negotiators that are directly or indirectly involved.

The Suppliers and Purchasing Management Policy applies to Grupo SURA, Suramericana, SURA Asset Management and each of its subsidiaries in the countries where they are present, according to the specific circumstances of each business, attachments may be included to complement the policy.

### **Guidelines**

1. Integral supplier and purchasing management must go through the following phases:
  - Selection: criteria and mechanisms of evaluation for suppliers. Includes registration, categorization, analysis and contracting.
  - Participative management: relationship mechanisms that allow for two-way interaction.
  - Evaluation: verification the criteria accomplish defined for relation to its suppliers by the company.
  - Development and strengthening: rate the supplier's actions as support for the company's dynamics.

2. In addition to the quality, timeliness and price criteria, the following will be taken into account for producing goods and contracting services:
  - Ethical behavior
  - Legal and regulatory compliance
  - Environmental, social and corporate governance practices
  - Impact on risk management
3. Business relations must protect and guarantee the rights of the Suppliers and monitor that they discharge their duties.
4. Contracting for goods or services must follow the process described in the Suppliers and Purchasing Manual.
5. Employees may well act as suppliers of goods and services, providing that objective hiring criteria are duly applied and upheld. Under no circumstance shall any privileges be given to any employee who happens to be a supplier or service provider.
6. Negotiations may not be affected by conflicts of interest or by actions that affect decisions in ways that are contrary to a transparent way of doing business. In the event of a conflict of interest, it must be disclosed first to the immediate superiors and, secondly, through the following e-mails of each companies: Grupo SURA [lineaetica@gruposura.com.co](mailto:lineaetica@gruposura.com.co); Suramericana S.A: [lineaetica@sura.com.co](mailto:lineaetica@sura.com.co) and Sura Asset Management [lineaetica@sura-am.com](mailto:lineaetica@sura-am.com)

## **Governance**

Each company will define the department responsible implementation of and compliance with this policy. In addition, there shall be committees established with representatives from different areas in the company to consolidate a process that is aligned with the corporate purposes of competitiveness and relations.

## **Levels of decision**

The party responsible for analyzing and approving the contract for a good or service would be defined according to the amount of the transaction.

## **Dissemination and updates**

This policy is to be disseminated to all employees in the Companies, and will be updated according to any changes in legal provisions or any other issue that might affect the guidelines described herein.

The managing areas of a compliance will monitoring that the employees take ownership of it depends of the case.