

ANTI-FRAUD AND ANTICORRUPTION FRAMEWORK POLICY

At Grupo Empresarial SURA, ethical behavior is an integral part of our business, and the means through which we achieve our strategic objectives, at the same time that we protect the actions and good name of the Companies that make up the business with (hereinafter, “the Companies”). This is why we do not accept any practices that go against transparency and legality, either inside the Companies or in our relations with various stakeholders.

This document complements the national and international regulations, and the Codes of Conduct and of Good Governance of Grupo Empresarial SURA. It establishes the guidelines to manage events that could pose a risk of fraud and/or corruption, and to minimize the probability of occurrence and impact of such acts.

The provisions and directives contained herein are applicable to Employees, Suppliers, Consultants, Top Management, members of the Boards of Directors (“Directors”), and other service providers to the Companies and their relations with the various stakeholders.

Scope and framework of application

This policy is mandatory for the Companies that make up Grupo Empresarial SURA, which must implement it according to the specific needs and requirements of the various business units and jurisdictions.

General guidelines

- The Companies, their Employees, Suppliers, Consultants, Top Management, Directors, and other service providers, must act at all times according to the principles of ethics and transparency and, as such, they will not allow any relationship mediated by inappropriate payments, promises, or economic or employment offers, or other benefits that might influence a decision and/or benefit specific interests.

- The Board of Directors and Top Management at each one of the Companies will be responsible for promoting an ethical culture and behavior, communicating the importance and the responsibility that each employee, supplier, consultant, Top Management, Directors, and other service providers have fraud or corruption events, and will guarantee the necessary resources to ensure that the objectives of the policy are achieved.
- Employees, Suppliers, Consultants, Top Management, Directors, and other service providers are responsible for knowing and understanding this policy, the actions that might constitute a fraud event, implementing the controls for which they are responsible, reporting any suspicious incidents through the channels set up by each Company, and for cooperating with any investigation that might ensue. Any failure to report and/or cooperate with the investigations will be considered a failure to comply with this policy and with the Codes of Good Governance and of Conduct.
- Each Company will have an anti-fraud and anticorruption program within the framework of the guidelines established in the Codes of Conduct and of Good Corporate Governance. The Program must be approved by their respective Boards of Directors and will include, at least, the following:
 1. **Structure:** The Company must have an organizational structure to implement the program. The structure must establish the roles and responsibilities of the various areas involved in the process of identifying, evaluating, and mitigating the risks of fraud and corruption.
In any case, implementation of the program may be delegated on a third-party, but this will not exempt the Company from its responsibility for managing the risks of fraud and corruption.
 2. **Policies and procedures:** The Company must implement policies and procedures aligned with the general directives established in this document, and that enable prevention, detection, investigation, and response to the fraud and corruption risks, and must including the legal requirements of their business environment, and establishing the regime of penalties for failure to comply with this policy.

- 3. Reporting channels and investigative areas:** The channels for reporting and the area responsible for investigating any report of a fraudulent act, regardless of the amount, will be established within the Company, and will attempt to make those investigations as quickly as possible and ensure their confidentiality.

- 4. Response to fraud:** The Company will set up an area in charge of determining any actions to be taken on the basis of the results obtained from the investigations, ensuring a responsible and fair action, according to the provisions of the internal policies and applicable legal norms.

- 5. Monitoring:** The procedures to carry out continuous monitoring to detect events of fraud, —either on the basis of fraudulent actions that have actually occurred, inherent fraud risk identified in the internal policies, or based on experience and a record of fraudulent events—, will be established in each Company.
In addition, each Company must implement the mechanisms to scale these reports, according to their governance bodies and corporate structure, making sure that the information is reported to Top Management on a regular and timely manner.

- 6. Education and culture:** The Company must have an education strategy for its Employees, Suppliers, Consultants, Top Management, Directors, and other service providers, to promote a culture based on the principle of rejection of fraud and corruption, and on the application of the principles of ethics and responsible behavior. The Company must place special emphasis on the responsibility of immediately reporting any actual act, or suspicion of, fraud or corruption about which they have knowledge.

Governance

The Board of Directors of Grupo SURA, and the Boards of Directors of each Company that is part of Grupo Empresarial SURA, are responsible for approving these policies. Any changes must be approved by the same bodies, following the guidelines established by Grupo SURA.

Dissemination and updating

This policy will be permanently disseminated to all Employees, Suppliers, Consultants, Top Management, Directors, and other service providers to the Companies, and will be updated according to organizational changes, legal provisions, or other aspects that might affect the guidelines described herein.