

SOCIAL INVESTMENT FRAMEWORK POLICY

GRUPO EMPRESARIAL SURA

Constant strengthening of the Corporate Governance system is one of the fundamental pillars of Grupo Empresarial SURA, and includes corporate responsibility guidelines within its scope. For this reason, it recognizes its impact on country development, not just because of the economic impact of its operations, but due to its capacity for influencing public dynamics and social transformation processes in the territories in which it is present, through social investment in initiatives that will help improve the living conditions of vulnerable populations. It also acknowledges that the social context influences the competitiveness, viability and sustainability of its companies.

In developing their Corporate Responsibility strategy, Grupo SURA and its subsidiaries (“the Companies”) channel their contributions to social development and corporate volunteer activities through the SURA Foundation in those countries where it is legally incorporated. In all other countries, contributions are made through the Companies themselves under guidelines established herein.

Social investment in Grupo Empresarial SURA focuses on initiatives that contribute to quality in education, cultural promotion and institutional consolidation. These purposes may be adapted depending on the social context of the different businesses and countries, in agreement with the SURA Foundation in Colombia.

GENERAL GUIDELINES

- 1. Independence of commercial interests:** social investments will be promoted in initiatives that will not give rise to potential conflicts of interest with the Companies and that safeguard independent actions and decision-making within the Companies.
- 2. Articulation of cross-sectoral alliances:** the Companies will participate in initiatives, the design, execution and evaluation of which involve public, private and social institutions, international cooperation and/or beneficiary communities.

3. **Actions in context:** initiatives will be developed that respond to the needs and individualities of each territory's context and that articulate with development proposals on the local agenda.
4. **Social innovation initiatives:** participation in initiatives that explore different ways of solving people's needs and encourage changing behaviors regarding social challenges will be promoted.
5. **Impact on public dynamics:** initiatives will contribute to the corporate purpose of impacting public dynamics for strengthening public institutions and generating an informed public opinion on topics that create development in the territories where the Companies are present.
6. **Knowledge Generation:** actions and reflections that help identify, document and systematize experiences and practices that contribute to developing and sharing knowledge within the Companies and throughout society will be promoted.
7. **Project-focused approach:** the Companies will participate in initiatives, the design, execution, evaluation and systematization of which are developed using a project management approach that guarantees the achievement of the proposed objectives and the generation of knowledge.
8. **Balanced communications:** social development processes will be accompanied by communications strategies that respond to the purpose of relating to each stakeholder group and are consistent with the way the institution wishes to project itself.
9. **Balance sheet soundness:** in countries in which the SURA foundation is legally incorporated, an endowment will be set up to guarantee financial solidity, so in the medium and long term initiatives can be developed without depending on the Companies' financial results.

MECHANISMS FOR SOCIAL INVESTMENT

In developing this policy, Companies can implement the following social investment mechanisms:

- 1. Social development initiatives:** participation in programs and projects that contribute to capacity development and welfare in vulnerable populations. These initiatives have the following characteristics, among others:
 - Their objectives are mainly related to quality in education, cultural promotion and institutional consolidation.
 - Their scope of execution extends to the medium and long-term.
 - They are conceived with the active participation of communities or beneficiaries through institutional alliances.

- 2. Corporate Volunteer Work:** participation by Company collaborators and their families in initiatives that encourage sharing time, knowledge, financial or in-kind contributions and talent with vulnerable populations. These initiatives allow:
 - Contributing to community capacity building and consolidation.
 - Understanding reality, becoming a part of its transformation and managing social learning.
 - Developing competencies related to being and doing in collaborators, strengthening their sense of belonging towards the company and improving their workplace performance.

- 3. Commercial or business initiatives with social components:** projects developed by the Companies, which, although their main purpose is commercial, help strengthen the projection of the SURA brand as a company that is committed to the social development of the countries where it has a presence.

- 4. Participation on the Board of social entities:** contributions of knowledge and experience of Company executives through their voluntary or delegated participation on Boards, steering committees and advisory committees of not-for-profit and social organizations.

- 5. Initiatives for citizen participation and democratic consolidation:** contribute to the development of initiatives for citizen participation that will promote an exercise of an active, responsible and solidary citizenship, and the strength and consolidation of democratic systems, seeking the countries' development and welfare. In the event that financial contributions to political parties or movements and significant citizen groups are considered, these must be governed by the legal provisions approved by each country's regulatory entities.

GOVERNANCE

Approval of this policy is the responsibility of the Grupo SURA Board of Directors and the Boards of Directors of each Company that belongs to Grupo Empresarial SURA. Any modification must be approved by these same bodies, following Grupo SURA guidelines.

SCOPE

The guidelines contained in the document must be observed by all companies that belong to Grupo Empresarial SURA.

DISSEMINATION

All persons participating in social investment management at the Companies must have knowledge of and apply this policy, complying with the provisions established herein.

The Grupo SURA Vice-Presidency for Corporate Affairs will be responsible for managing this policy and, in this sense, will manage its dissemination, compliance and updates with the corresponding areas in the Companies belonging to Grupo Empresarial SURA.