

GRI STANDARDS CONTENT INDEX

THIS REPORT HAS BEEN PREPARED IN ACCORDANCE WITH THE CORE OPTION OF THE GRI STANDARDS.

GENERAL STANDARD DISCLOSURES			
GRI Standard	General Reporting Aspects	Location	External Assurance
GRI 101 Foundation			
101	Foundation: a. Reporting Principle b. Using the GRI Standards for comprehensive sustainability reporting c. Statements on the use of the GRI standard		✓
102: General Disclosures			
1. Organizational profile			
102-1	Name of the Organization	Grupo de Inversiones Suramericana	✓
102-2	Activities, brands, products and services	Corporate Information - Company profile Page 16	✓
102-3	Location of the Organization's headquarters	The Organization's headquarters are located in the city of Medellin, Antioquia, Colombia, at the following address. Carrera 43A # 5A - 113	✓
102-4	Indicate how many countries in which the Organization operates and name all those countries where the Organization has significant operations	Corporate Information - Company profile Page 18	✓
102-5	Describe type of ownership and its legal form	Stock Corporation Page 43	✓
102-6	Indicate which markets you serve (with geographical breakdown, by sector and by type of client and recipient)	Corporate Information - Company profile Page 18	✓
102-7	Determine the size of the Organization (employees, operations, sales, capitalization, products and services offered)	Corporate Information - Company profile Our human talent Pages 18 - 70	✓
102-8	Labor indicators	Our human talent Pages 71 - 75	✓
102-9	Describe the Organization's supply chain	See subsidiary report	✓

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102-10	Report on any significant changes that have taken place during the reporting period in question in terms of the Organization's size, structure, ownership or supply chain	Financial Pages 62	strength ✓
102-11	Indicate how the Organization addresses, if applicable, the precautionary principle		✓
102-12	Compile a list of externally-developed economic, environmental and social charters, principles or other initiatives to which the Organization subscribes or which it endorses	Corporate Information - Company profile Page 9	✓
102-13	Compile a list of the main memberships of industry or other associations, and national or international advocacy organizations to which the Organization belongs.	Corporate Information - Company profile Page 9	✓
2. Strategy:			
102-14	Statement from the Organization's most senior decision-maker regarding the importance of sustainability to the Organization and its strategy for addressing such	Corporate Information - Company profile Pages 8 - 10	✓
102-15	Describe the key impacts, risks and opportunities	Risks and Opportunities Pages 42 - 90	✓
3. Ethics and transparency			
102-16	Describe the Organization's values, principles, standards and norms, such as codes of conduct or codes of ethics	Corporate Information - Company Profile Ethics and Corporate Governance Pages 8 - 40	✓
102-17	Describe the internal and external mechanisms for reporting concerns and seeking advice on ethical and lawful conduct as well as for matters related to the Organization's integrity	Ethics and Corporate Governance Page 40	✓
4. Corporate governance.			
102-18	Describe the Organization's governance structure, including committees of the highest governance body	Ethics and Corporate Governance Page 45	✓
102-19	Describe the process for delegating authority for economic, environmental, and social topics from the highest governance body to senior	Ethics and Corporate Governance Page 52	✓

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	executives and other specific employees.		
102-20	Indicate whether the Organization has appointed an executive-level position or positions that are responsible for economic, environmental, and social topics	Ethics and Corporate Governance Page 52	✓
102-21	Describe the consultation processes between stakeholders and the higher governance body with respect to economic, environmental and social issues	Stakeholder consultations are coordinated between different governing bodies of both Grupo SURA and its subsidiaries, depending on the specific stakeholder. The areas that maintain the most contact with our stakeholders are: Investor Relations Communications and Corporate Identity Human Talent Corporate Responsibility	✓
102-22	Describe the structure of the Organization's highest governance body and its committees	Ethics and Corporate Governance Page 46	✓
102-23	Indicate whether the person chairing the highest governance body also holds an executive position	Ethics and Corporate Governance Page 46	✓
102-24	Describe the processes for appointing and selecting the highest governance body and its committees	Ethics and Corporate Governance Page 47	✓
102-25	Describe the processes by which the highest governance body prevents and manages potential conflicts of interest	Ethics and Corporate Governance Page 51	✓
102-26	Describe the highest governance body's and senior executives' roles in the development, approval, and updating of the Organization's purpose, value or mission statements, strategies, policies, and goals related to economic, environmental, and social impacts	Ethics and Corporate Governance Page 46	✓
102-27	Indicate which measures have been taken to develop and enhance the highest governance body's collective knowledge of economic, environmental, and social topics.	Ethics and Corporate Governance Page 40	✓

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102-28	Describe the processes for evaluating the highest governance body's performance with respect to governance of economic, environmental, and social topics. Indicate whether such evaluation is independent or not, and how often it is carried out.	Ethics and Corporate Governance Page 39	✓
102-29	Describe the role of the highest governance body's role in identifying and managing economic, environmental, and social topics and their impacts, risks, and opportunities	Ethics and Corporate Governance Page 46	✓
102-30	Describe the highest governance body's role in reviewing the effectiveness of the Organization's risk management processes for economic, environmental, and social topics.	Ethics and Corporate Governance Page 46	✓
102-31	Indicate how often the highest governance body reviews economic, environmental, and social topics and their impacts, risks, and opportunities.	Ethics and Corporate Governance Page 46	✓
102-32	Indicate the highest committee or position that formally reviews and approves the Organization's sustainability report and ensures that all material topics are covered	Ethics and Corporate Governance Page 46	✓
102-33	Describe the process for communicating critical concerns to the highest governance body.	Ethics and Corporate Governance Page 46	✓
102-34	Indicate the total number and nature of critical concerns that were communicated to the highest governance body; also describe the mechanism(s) used to address and resolve such critical concerns.	The Board of Directors addressed, among others, the following topics: strategy and the main action plans put into place, risk management and control systems, Corporate Governance, succession plans, financial, accounting and management reports, independent auditing, compliance with all applicable legislation and standards and non-financial accountability.	
102-35	Describe the remuneration policies for the highest governance body and senior executives	Ethics and Corporate Governance Page 53	✓

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102-36	Describe the processes for determining remuneration	Ethics and Corporate Governance Page 53	✓
102-37	Explain how stakeholder views on remuneration are sought and taken into account, including, where appropriate, the results of votes on remuneration policies and proposals.	Ethics and Corporate Governance Page 53	✓
102-38	Annual total compensation ratio	This information is not reported given its confidential nature	
102-39	Percentage increase in annual total compensation ratio	This information is not reported given its confidential nature	
5. Stakeholder engagement			
102-40	Compile a list of stakeholders that are engaged by the Organization	Corporate Information - Stakeholder groups Page 19	✓
102-41	Collective bargaining agreements Freedom of association	Our human talent Page 74	✓
102-42	Indicate the basis for identifying and selecting stakeholders with whom to engage	Corporate Information - Stakeholder groups Page 19	✓
102-43	Describe the Organization's approach to stakeholder engagement	Grupo SURA engages with its stakeholders through different liaisons channels in order to build a two-way relationship that leverages both the Organization's growth and its contribution to society.	✓
102-44	Identify key topics and concerns that have been raised through stakeholder engagement and describe how the Organization has evaluated those key topics and concerns, including through its reporting	Corporate Information - Stakeholder groups Page 19	✓
6. Reporting practices			
102-45	Entities included in the Organization's consolidated financial statements or equivalent documents, and which are not included in the scope of the current report	Corporate Information - Company profile Page 8	✓

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102-46	Describe the process followed to determine the content of this report and the coverage of each aspect	<p>Corporate Information - Company profile This Annual Report includes 18 topics that are material for the SURA Business Group in all those sectors in which it operates (investments, savings, pensions, insurance and health) as well as countries where present (Argentina, Brazil, Chile, Colombia, El Salvador, Mexico, Panama, Peru, Dominican Republic and Uruguay). These issues were identified as part of the materiality analysis conducted in 2016 and were subsequently prioritized within the Organization by Senior Management in 2017</p> <p>Page 19</p>	✓
102-47	Compile a list of the material topics that were identified during the process of defining the contents of the report	Corporate Information - Materiality Analysis Page 19	✓
102-48	Describe the effect of any restatements of information given in previous reports, and the reasons for such restatements.	There were no restatements of information in 2019.	✓
102-49	Indicate any significant changes in the scope and coverage of each aspect compared to that stated in previous reports	There were no changes in information in 2019.	✓
102-50	Reporting period	Sustainability reports are drawn up every year, and this report corresponds to the period January 1st to December 31, 2019.	✓
102-51	Date of most recent report (if applicable)	March 2019	✓
102-52	Reporting cycle (annual, biennial, etc.)	Annual	✓
102-53	Provide a point of contact to resolve any questions that may arise regarding the contents of this report	<p>The Spanish version of this report has been made available on line at: https://www.gruposura.com/wp-content/uploads/2020/03/sura-grupo-informe-anual-web-2019.pdf</p> <p>Its English version can be found by clicking on the following link https://www.gruposura.com/wp-content/uploads/2020/03/sura-grupo-informe-anual-web-2019-ENG.pdf Should you have any comment to make or wish to request additional information, please contact Juan Fernando Rojas Trujillo - Content Director for Grupo SURA, at jfrojas@gruposura.com.co</p>	✓

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102-54	Indicate which “in accordance” option the Organization has chosen to follow:	This report has been prepared in accordance with the GRI Standards: Core option Page 8	✓
102-55	GRI content index	Annexes	✓
102-56	External assurance	Annexes	✓

TOPIC SPECIFIC DISCLOSURES				
GRI Standard	GRI Reference Description	Location	Omitted	External Assurance
Corporate Governance		Material aspects:		
		Regulations		
103-1	Explanation of the material topic and its boundaries	Ethics and Corporate Governance Page 38	N/A	
103-2	Management approach and its components	Ethics and Corporate Governance Page 38	N/A	
103-3	Evaluation of management approach	Ethics and Corporate Governance Page 38	N/A	
205-1	Operations assessed for risks relating to corruption	Ethics and Corporate Governance Page 38	N/A	✓
205-2	Communication and training on anti-corruption policies and procedures	<p>The training program provided to suppliers address issues relating to our corporate principles (fairness, transparency, responsibility, respect) as well as the Business Group's Code of Conduct, which addresses issues such as preventing asset laundering, fraud, bribery and corruption, conflicts of interest, free competition, among others.</p> <p>We also staged an on-line training course in 2018 for all employees of our Business Group, which included the above-mentioned topics. This course is valid for a period of two (2) years.</p> <p>In 2019, we updated our internal rules and regulations as relating to compliance, risks, asset laundering and corruption, as described in greater detail in our Annual Corporate Governance Report which has been made available on the Company's website (https://www.gruposura.com/wp-content/uploads/2020/03/sura-grupo-annual-corporate-governance-report-2019.pdf)</p>	N/A	✓
205-3	Confirmed incidents of corruption and actions taken	Ethics and Corporate Governance Page 41	N/A	✓
419-1	Failure to comply with applicable legislation and regulations governing social and economic issues	Ethics and Corporate Governance Page 41	N/A	
IP1	Number of people who received training with regard to ethical issues, total hours of training given, amount invested, main topics addressed.	27 thousand employees received an on-line training course on our Ethics and Corporate Governance System in 2018, this having a total term of validity of two (2) years.	N/A	

TOPIC SPECIFIC DISCLOSURES				
GRI Standard	GRI Reference Description	Location	Omitted	External Assurance
Material aspect:				
Innovation		Business development		
103-1	Explanation of the material topic and its boundaries	Transformation and innovation Page 80	N/A	
103-2	Management approach and its components	Transformation and innovation Page 80	N/A	
103-3	Evaluation of management approach	Transformation and innovation Page 80	N/A	
Material aspects:				
Strategic Capital Allocation Capital Structure				
103-1	Explanation of the material topic and its boundaries	Financial strength Page 56	N/A	
103-2	Management approach and its components	Financial strength Page 61	N/A	
103-3	Evaluation of management approach	Financial strength Pages 56 - 63	N/A	
Material aspects:				
Attracting, Developing and Retaining Human Talent Business Culture, Occupational Health and Safety				
103-1	Explanation of the material topic and its boundaries	Our human talent Page 68	N/A	
103-2	Management approach and its components	Our human talent Page 69	N/A	
103-3	Evaluation of management approach	Our human talent Page 69	N/A	
202-1	Ratios of standard entry level wage by gender and compared to local minimum wage in all those countries where the Organization has significant operations	Generally speaking, the minimum wage paid out by the Organization exceeds the minimum wage established by the State in all those countries where SURA is present.	N/A	
401-1	Total number and rate of new employee hires and average turnover by age group, gender and region	Our human talent Pages 76 - 78	N/A	
401-2	Benefits provided to full-time employees	Our human talent Pages 73 - 74	N/A	

TOPIC SPECIFIC DISCLOSURES				
GRI Standard	GRI Reference Description	Location	Omitted	External Assurance
403-1	Percentage of workers who are represented by formal health and safety committees made up of management and employee representatives, so as to help monitor and advise on occupational health and safety programs.	100% of the Business Group's employees are represented at the health and safety committees, formally established in each of the Companies so as to help control and advise on occupational health and safety programs.	N/A	
403-2	Type and rates of work-related injuries, occupational disease, lost days and number of fatalities broken down by region and gender.	Our human talent Page 76	N/A	✓
404-1	Average hours of training per year per employee, broken down by gender and by job category	Our human talent Page 72	N/A	✓
404-2	Programs for upgrading employee skills and continuous training to facilitate their continued employability and the management of career endings.	Our human talent Pages 71 - 72	N/A	
405-1	Diversity of governance bodies	Our human talent Page 77	N/A	
IP3	Amounts invested in employee training and development initiatives	Our human talent Page 72	N/A	
IP4	Number of employees in internships and/or short- or long-term assignments	Our human talent Page 77	N/A	
Material aspect: ESG investment approach				
103-1	Explanation of the material topic and its boundaries	Sustainable management Page 100	N/A	
103-2	Management approach and its components	Sustainable management Page 100	N/A	
103-3	Evaluation of management approach	Sustainable management Page 100	N/A	
Material aspect: Social investment				
103-1	Explanation of the material topic and its boundaries	Sustainable management Page 102	N/A	
103-2	Management approach and its components	Sustainable management Page 102	N/A	
103-3	Evaluation of management approach	Sustainable management Page 102	N/A	

TOPIC SPECIFIC DISCLOSURES				
GRI Standard	GRI Reference Description	Location	Omitted	External Assurance
IP9	Description of different lines of social investment together with their corresponding projects and amounts invested in each of these. Geographical distribution of social investments	Sustainable management Pages 104 - 105	N/A	
IP11	Beneficiaries of social investment programs (individuals and institutions)	Sustainable management Page 102	N/A	
IP13	Corporate Volunteer Corps - programs, number of volunteers, number of working or non-working hours dedicated, employee contributions to solidarity funds, partnerships for organizing volunteer work, operators, investments	Sustainable management Page 106	N/A	
Material aspect: Handling our Environmental Impact				
103-1	Explanation of the material topic and its boundaries	Sustainable management Page 106	N/A	
103-2	Management approach and its components	Sustainable management Page 106	N/A	
103-3	Evaluation of management approach	Sustainable management Page 107	N/A	
201-2	The financial implications of climate change and other associated risks and opportunities	Sustainable management Page 107	N/A	✓
302-1	Energy consumption within the Organization	Website	N/A	✓
302-4	Reductions in energy consumption	Website	N/A	✓
303-1	Water withdrawn by source	Website	N/A	✓
305-1	Direct (scope 1) GHG emissions	Sustainable management Page 108	N/A	✓
305-2	Indirect (scope 2) GHG emissions	Sustainable management Page 108	N/A	✓
305-3	Indirect (scope 3) GHG emissions	Website	N/A	
305-5	Reductions in GHG emissions	Website	N/A	✓
306-2	Total weight of waste classified as to type and disposal method	Website	N/A	✓
307-1	Cost of significant fines and number of non-monetary sanctions for failure to comply with environmental regulations.	At the end of 2019, none of Grupo SURA 's affiliates or subsidiaries had been fined or sanctioned for any non-compliance with any environmental legislation and/or regulations	N/A	✓

TOPIC SPECIFIC DISCLOSURES				
GRI Standard	GRI Reference Description	Location	Omitted	External Assurance
Material Issues reported by the SURA Subsidiaries (Suramericana and SURA AM)				
	Comprehensive Range of Services	Suramericana 's Annual Report SURA AM 's Annual Report	N/A	
	Supply Chain		N/A	
	Long-term client relationships		N/A	
	Protecting Clients and Users		N/A	