

SOCIAL INVESTMENT FRAMEWORK POLICY

Grupo Empresarial SURA

Businesses are what drive development in a society. They are important actors in contributing to the wellbeing of communities and to making them more equitable, not only through their economic and social impacts, but through their ability to have a positive impact on the advancement of public policy and on processes of social transformation.

Grupo de Inversiones Suramericana S.A.(Grupo SURA) and its subsidiaries (referred to together as, the “Companies” or “Grupo Empresarial SURA”) voluntarily take on this shared responsibility by recognizing the impact they have on the sustainable development of the countries in which they operate and by playing an active role in overcoming the challenges of these societies.

Our companies take on this ethical commitment and believe that consistency is the only way to create value and build trust among our different stakeholders. They also believe that this is essential to creating wellbeing and sustainable development for people, organizations and society.

Grupo Empresarial SURA therefore takes a leadership role in developing social investment initiatives by allocating and managing financial and non-financial resources in a voluntary, structured and systematic way. It achieves this through its involvement in projects and programs that foster well-being and better living conditions.

Just as Grupo SURA's business practices must reflect a corporate philosophy that prioritizes quality of life and competitiveness through respect, responsibility, fairness and transparency; its social investments must also reflect this and must have a unique understanding of different contexts, valuing knowledge and diversity as the foundations of long-term contributions that transform social realities.

The social investments of Grupo Empresarial SURA may be implemented by the Companies themselves and/or Fundación SURA under the guidelines, mechanisms and scopes established in this policy. In accordance with its strategy, social context and legal limitations, Sura Companies may create manuals and procedures that help to implement this policy.

1. Areas of Social Investment

The core areas that Grupo Empresarial SURA has identified for implementing its social investment strategy in Latin America, include the following:

- **Quality Education:** This is an investment in systems that foster skill-building in educators by strengthening the skills of "being, knowing and doing" and facilitating professional and employment opportunities through an approach that fits the different dynamics and challenges that are unique to each context.

Grupo Empresarial SURA believes that education is what drives development, as it has the ability to foster growth, overcome social differences and make sure that there are more equal opportunities..

Through access to education and quality learning experiences, people are empowered to grow, become entrepreneurs and innovate. To invest in a quality education for all, is to contribute to a more equitable region with less inequalities. This type of investment must also be effective, transparent and evidence-based..

- **Promoting Art and Culture:** These are initiatives that seek to promote the meaningful social integration of culture that brings value to all types of audiences. Our companies use different mechanisms to achieve this such as: research, publications, publications in progress, concerts and festivals. In addition to the work we do in providing education to the public, we also support future talents, improve cultural endeavors, and support museums and entities responsible for promoting and the conserving cultural patrimony.

For Grupo Empresarial SURA, to talk about culture is to talk about a society's shared experiences, its accumulation of traditions and the approach it takes with the world. Part of culture involves the many ways in which communities express themselves and implement their processes of change. Art and culture are a world that awakens the sensitivity in people and that constantly invites people to evaluate the diversity and creative power of people and their communities.

- **Well-being, Promoting Healthy Lifestyles:** These initiatives seek to impact people's behaviors and habits in order to improve their quality of life. To this end, our Companies may focus their investments on strategies for promoting healthy lifestyles, such as: financial, physical and mental health, the culture of aging and/or the elderly, safe and sustainable transportation, playing sports and taking care of your body, among others.

This is a strategic area for our Companies because it is directly related to the Organization's interest in fostering skills that allow people to get their needs met, have greater freedom in decision-making, and align their actions in a way that has a sustainable impact on their well-being.

- **Institutional Strengthening:** These are financial, experience and talent-based resources that are given to organizations that focus on developing, researching and improving public interest areas such as justice, transparency, democracy, the environment, education, competitiveness and civic responsibility.

This investment area is a materialization of Grupo Empresarial SURA's commitment to having an impact on the advancement of public policy in the countries in which it operates. It understands that strong institutions that contribute to a country's social and economic fabric help build more democratic and fair societies.

Any financial contributions made to campaigns, political parties, movements or major citizens' groups must always be approved by Grupo SURA and must adhere to the internal guidelines and legal regulations that apply to each country on this matter.

In addition to these core areas, Grupo Empresarial SURA can make social investments on critical issues, specific to each country, by providing humanitarian aid and/or assistance for situations such as: natural disasters, migration and internal conflicts, among others.

2. Social Investment Mechanisms

In effectuating this policy, Grupo Empresarial SURA may recur to implementing the following social investment mechanisms:

2.1. Our own initiatives: Our Companies and/or Fundación SURA develop, design and implement these initiatives, which address the strategic objectives and goals they have identified. These initiatives can involve the allocation of economic, technical and/or human resources..

2.2. Other organizations' initiatives: These are initiatives from organizations other than our Companies that are selected to receive support due to their strategic level, impact, and relevance. This support is provided through the allocation of economic, technical and/or human resources.

2.3. Serving on the boards of social organizations: Company executives contribute their knowledge and experience by volunteering or serving as a delegation on the boards, steering committees and advisory committees of non-profit entities and social organizations.

3. Guidelines for managing social investments

Grupo Empresarial SURA's social investments are purpose-driven, responsible, respectful and ethical and are a product of Grupo SURA's corporate principals and of the best international management practices on this matter.

To ensure that its investments meet these standards, they must adhere to the following guidelines:

3.1. Guidelines for the purpose of the investment

- **Social Innovation:** Initiatives will be supported that explore different and innovative ways to address people's needs and promote behavioral changes, despite the existence of social challenges.
- **Impact on the advancement of public policy:** Initiatives will support our corporate purpose of having a positive impact on the development of public policies that strengthen institutions and help form informed public opinions about issues that further the development of countries and territories where our companies operate..
- **Knowledge creation:** Actions and analyses will be supported that help identify, document and systematize experiences and best practices that contribute to developing and spreading knowledge for our Companies and for society.
- **Impact and social return:** The investments made on the issues identified by this policy must have a social impact that fosters sustainable, long-term, replicable and scalable change, with impacts that can be measured and verified.

3.2. Guidelines that facilitate investment

- **Relevance:** The relevance of the of our Companies' social investment initiatives will be determined by whether they align with at least one of the social investment areas stated in this policy.
- **Action in context:** Initiatives will be supported that meet the needs and situations that are unique to each context and that are based on the development initiatives of local, national and regional agendas.
- **Coordination of inter-sectoral partnerships:** Initiatives will be supported that design, implement and evaluate the joint efforts and the capacities of different actors including public, private, social, international cooperation institutions and/or the communities being served.
- **Social project management approach:** Initiatives will be supported whose design, implementation, evaluation and systematization is developed with a social project management approach. Standards of due diligence will be applied in this approach that ensure that the proposed objectives will be met, that knowledge will be created and that the sustainability of outcomes and impacts will be achieved.
- **Good governance:** The mechanisms for investment decision-making are to be consistent with the corporate governance standards of Grupo Empresarial SURA, safeguarding ethical and transparent conduct that is consistent with the principles of the United Nations Global Compact, to which our Business Group subscribes.
- **Balanced communication:** Support will be provided to social development efforts through communication strategies that reflect the nature of the relationship held with each stakeholder. These strategies will be consistent with the desired scope of the institution and regular communication about initiatives will be shared.

4. Communication and Reporting

- **4.1. Periodic reports from our Companies:** Annually, the Company's sustainability and/or human talent departments must gather all the information related to what is expressed in this policy and report it to Grupo SURA in a way that identifies how its social investment strategies have been implemented.
This information is also useful for managing processes involving the Business Group's voluntary standards and commitments.
- **4.2. Fundación SURA Report:** As established in the foundation's bylaws, a report on all of the initiatives that have taken place throughout the year must be submitted annually to the area responsible as defined in this policy. This information must be reflected in the annual management report.
- **4.3. Reporting Methodology:** The Companies and the Fundación SURA are to use reports as a tool, which are designed to consolidate the results and impacts of the Business Group's annual social investments. These results and impacts will be submitted to the areas responsible of each subsidiary.

5. Governance

5.1. Strategic guidelines for management.

The Sustainability and Corporate Governance Committee of Grupo SURA's Board of Directors will be the final authority to discuss and implement strategic and general guidelines regarding the responsible management of these investment. In turn, the Sustainability and Corporate Governance Committees of the Companies' boards of directors are to ensure compliance to this policy and its respective manuals and procedures.

The Company-specific manuals and procedures must be discussed and approved to fit the guidelines established in this policy.

5.2. Fundación SURA.

With Fundación SURA, the Board of Directors of the legally established foundations from each country will be the final authorities for discussing the strategic and general guidelines for the responsible management of social investments in adherence to the provisions of this policy.

5.3. Promoting art and culture.

The Culture Committee will be one of the bodies responsible for carrying out this corporate purpose in accordance with the scopes and guidelines it has established for itself.

Consisting of company representatives (from the communications, marketing and human talent departments), the Culture Committee, and Fundación SURA's Social Management Department, the Sponsorship and Cultural Endorsement Round Table will be the body that offers criteria, fosters initiatives or analyses opportunities for becoming involved in or supporting the promotion of art and culture.

5.4.

Grupo SURA's Board of Directors is responsible for approving this policy. Once Grupo SURA has approved it, it must be approved by the Boards of Directors of its subsidiaries and lastly by the Boards of Directors or equivalent bodies of each Company. Any modifications to this policy must be approved in this same order by these same corporate bodies.

5.5.

All people involved in managing the Companies' and Fundación SURA's social investments must be familiar with and adhere to this policy.

5.6.

Grupo SURA's Corporate Responsibility Office is responsible for administering this policy and will therefore coordinate with those areas involved in fulfilling, updating and disseminating it.

5.7.

This policy shall come into effect upon its approval by each of the Companies' Boards of Directors or equivalent bodies.
