

THE SURA BUSINESS GROUP SPECIAL REPORT - 2019

Grupo de Inversiones Suramericana S.A.

Reporting period: January 1st, to December 31st, 2019

In accordance with that stipulated in Article 29 of Law 222 of 1995, the SURA Business Group presents its Special Report corresponding to 2019:

THE SURA BUSINESS GROUP'S STRUCTURE

Controlling company (Parent): Grupo de Inversiones Suramericana S.A. (Grupo SURA)

Grupo SURA is the parent company of Grupo Empresarial SURA, with a presence spanning a total of 10 countries in Latin America and whose strategic focus is on providing its financial services, namely insurance, pensions, savings, investment, asset management and banking. Its shares are listed on the Colombian Stock Exchange (BVC) and the Company is registered with the ADR Level 1 program in the US

LEGAL STATEMENTS AND COMPLIANCE

- The SURA Business Group, at December 31, 2019, was made up of 85 companies (hereinafter referred to as the "Companies").
- During the aforementioned reporting period, the Companies carried out transactions amongst themselves on an occasional basis, and both these, and those performed with third parties, were agreed upon in the best interest of each of the Companies while ensuring that these were carried out under competitive market conditions, acknowledging the synergies existing as a Business Group and protecting the contractual balance of such.
- The transactions and decisions of the Companies that make up the Sura Business
 Group were not swayed by the influence of, or carried out or made in the exclusive
 interest of its Parent company. Indeed, these were carried out or made, or ceased to
 be carried out or made, for the purpose of creating added value for the entire Group, in
 the best interest of each of the controlled companies involved in said transactions.
- The transactions between the companies belonging to the SURA Business Group were carried out pursuant to all applicable legislation, the "Framework Policy governing Related Party Transactions" as well as other applicable internal rules and regulations, all of which are faithfully reflected in the financial statements of each of the Companies.

TRANSACTIONS CARRIED OUT BETWEEN GRUPO DE INVERSIONES SURAMERICANA S.A. AND OTHER ENTITIES BELONGING TO THE SURA BUSINESS GROUP

*Figures stated in COP millions

Liability Accounts				
Counterparty	ltem	Amount	Special terms and conditions (Different from market terms)	
Inversiones y Construcciones Estratégicas S.A.S.	Intercompany credit	(74.225)	N/A	
Servicios Generales Suramericana S.A.	Darmall dia a contra contra mina di bor	(154)	N/A	
Seguros Generales Suramericana S.A.	Payroll discounts authorized by	(111)	N/A	
Seguros de Vida Suramericana S.A.	employees	(22)	N/A	

Expense				
Counterparty	Item	Amount	Special terms and conditions (Different from market terms)	
Inversiones y Construcciones Estratégicas S.A.S.	Intercompany credit - Interest on credit	(1.574)	N/A	
Seguros Generales Suramericana S.A.	Other fees - Tax Services rendered	(259)	N/A	
Seguros Generales Suramericana S.A. Vehicle Policies		(61)	N/A	
Seguros Generales Suramericana S.A.	Fire and Earthquake Policies	(24)	N/A	
Operaciones Generales Suramericana S.A.S.	Vehicle Policies (Financing)	(19)	N/A	
Consultoría en Gestión de Riesgos Suramericana S.A.S.	Office Equipment - Furniture Acquisitions	(11)	N/A	
Seguros Generales Suramericana S.A.	Vehicle Policies	(7)	N/A	
Seguros Generales Suramericana S.A.	Other Insurance Policies	(4)	N/A	
Consultoría en Gestión de Riesgos Suramericana S.A.S.	Other fees - Services Rendered	(3)	N/A	
Servicios de Salud IPS Suramericana S.A.	Other Fees - Employee Entrance Exams		N/A	
Seguros Generales Suramericana S.A.	Other Insurance Policies	(2)	N/A	

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Counterparty	Amount
Sura Asset Management S.A.	165,923
Suramericana S.A.	460,924
ARUS S.A.	22

SURA Business Group - Consolidated transactions

The following table shows the degree of the economic relations existing between the companies that make up the SURA Business Group and reflects in a consolidated manner the transactions carried out between these.

The transactions herein reported include loans between related companies based on contractually agreed terms and conditions and market interest rates; financial, administrative, IT and payroll services, leases and sub-leases for both office space and retail premises, re-invoiced public utility services, insurance policies, among others.

Company	Asset Accounts	Liability Accounts	Income	Expense
Grupo De Inversiones Suramericana S.A.	-	(74,512)	-	(1,967)
Administradora General De Fondos Sura S.A.	578	(6,659)	-	(53,932)
AFAP Sura S.A.	-	(3)	222	(24)
AFISA Sura S.A.	-	(252)	-	(2,058)
Afore Sura S.A. De C.V.	1,004	(1,975)	10,274	(13,155)
AFP Capital S.A.	-	(2,536)	415	(36,266)
AFP Integra S.A.	-	(285)	261	(1,173)
Arus S.A.	3,938	(10,291)	30,873	(300)
Aseguradora De Créditos Y Garantías S.A.		(1,409)	-	(466)
Aseguradora Suiza Salvadoreña S.A. Asesuisa	914	(229)	8,793	(501)
Asesores Sura S.A. De C.V.	3,067	(509)	31,329	(431)
Asesuisa Vida, S.A. Seguros De Personas	92	(914)	750	(8,744)
Chilean Holding Suramericana Spa	-	(52,669)	-	(2,514)
Consultoría En Gestión De Riesgos Suramericana S.A.S.	144	(788)	106,608	(791)
Corredor De Bolsa Sura S.A.	252	-	2,058	(222)
Corredores De Bolsa Sura S.A.	2,750	(141)	33,858	(9,421)
Diagnóstico Y Asistencia Médica S.A.	14,262	(1,779)	214,336	(8,674)
Enlace Operativo S.A.	12,799	-	17,194	(50)
EPS Y Medicina Prepagada Suramericana S.A.	11,758	(21,066)	4,840	(546,451)
Fondos Sura SAF S.A.C.	131	(113)	-	(1,315)
Hábitat Adulto Mayor S.A.	-	-	-	(119)
Inversiones Sura Brasil Participacoes Ltda	-	(271)	-	
Inversiones Suramericana Chile Limitada	-	(212)	-	-

Company	Asset Accounts	Liability Accounts	Income	Expense
Inversiones Y Construcciones Estratégicas S.A.S.	74,234	-	1,665	_
Nbm Innova, S.A De C.V	-	(93)	-	(1,140)
Operaciones Generales Suramericana S.A.S.	11,136	(38,740)	108,014	(3,506)
Pensiones Sura S.A. De C.V.	-	(2,386)	-	(7,956)
Promotora Sura Am S.A. De C.V.	5,855	-	22,273	_
Seguros De Vida Sura S.A. (Chile)	5,859	(996)	43,664	(20,898)
Seguros De Vida Suramericana S.A (Chile)	1	(2,154)	-	(2,813)
Seguros De Vida Suramericana S.A.	17,528	(23,790)	12,483	(317,034)
Seguros Generales Suramericana S.A (Chile)	54,761	(74)	5,238	(1,750)
Seguros Generales Suramericana S.A.	29,304	(15,626)	36,603	(118,229)
Seguros Sura S.A (Argentina)	1,409		-	466
Seguros Sura S.A (Brasil)	271	-	-	_
Seguros Sura S.A.	-	(335)	10	(2,355)
Seguros Sura, S.A De C.V. (México)	-	(498)	-	(2,101)
Seguros Suramericana Panamá S.A.	-	(34,655)	520	(8,366)
Servicios De Salud IPS Suramericana S.A.	15,454	(15,307)	538,944	(62,934)
Servicios Generales Suramericana S.A.	41,445	(20,115)	5,238	(3,334)
Servicios Generales Suramericana S.A. (Panamá)	327	-	502	_
Sociedad Agente De Bolsa S.A.	101	-	968	(3)
Sura Art Corporation S.A. De C.V.	126	(13)	1,247	(98)
Sura Asset Management Argentina S.A.	-	(1)	-	-
Sura Asset Management Chile S.A.	-	(258)	10,847	(2,294)
Sura Asset Management México S.A. De C.V.	-	(12)	-	(101)
Sura Asset Management Perú S.A.	343	-	443	-
Sura Asset Management S.A.	1,955	(3,587)	5,546	(22,670)
Sura Asset Management Uruguay Sociedad De Inversión S.A.	-	101	5,552	(6,061)
Sura Data Chile S.A.	-	-	9,666	-
Sura Investment Management S.A. De C.V.	244	(6,883)	3,344	(48,619)
Sura Real Estate S.A.S.	-	-	-	(7)
Sura Servicios Profesionales S.A.	6,550	(799)	47,736	(675)
Suramericana S.A.	25,896	(1,318)	1,923	(1,354)
Wm Asesores En Inversiones S.A De C.V.	-	(185)	-	(1,666)
Seguros Sura S.A. (Uruguay)	7	(69)	-	(267)
Sura Re	27	(116)	790	(688)

David Bojanini García Chief Executive Officer Grupo SURA