

## **CODE OF CONDUCT FOR SUPPLIERS**

### **Grupo Empresarial SURA**

Our common purpose is to build Value and Trust.

#### **Compliance**

This document is a framework of Grupo Empresarial SURA's Code of Conduct.

Full awareness of this Code is a prior requisite for any contract entered by and between the Companies of Grupo Empresarial SURA. By signing the contract and accepting the purchasing order, the Supplier warrants and can vouch that its operations are subject to the provisions included hereto.

The Companies may, either directly or through third parties, follow-up and assess its activities if Grupo Empresarial SURA is aware of any irregular action demanding corrective measures.

#### **Our Target**

Grupo Empresarial SURA established a number of specific principles that should be expressly accepted by Suppliers and attached to the respective contracts. Any breach of the actions contained hereto can lead to sanctions and in turn to the termination of the contractual relations as provided in this Code, the internal guidelines of the Companies and the regulations in force.

This document extends to every affiliate and subsidiary of Grupo Empresarial SURA and establishes several minimum non-negotiable standards which our suppliers must adhere to, notwithstanding where they produce goods or provide services. It is expected that those who are covered by the provisions expressed in this Code, can uphold the local applicable regulations and all other legal standards in force; and in terms of legal provisions and this Code, those providing the highest protection shall apply.

## **Our Actions, Our Value**

Suppliers are essential to our activities and by working together we share risks and create opportunities. Hence, it is paramount to establish a work philosophy that sheds light on responsible actions.

When we do things well keeping in mind our common purposes, we create value in our relations, build trust and contribute to a better setting for all.

By acting with RESPECT, RESPONSIBILITY, FAIRNESS AND TRANSPARENCY, we give life to the commitments set forth in this Code of Conduct as well as the Internal Work Regulation, the internal guidelines of the Companies and the regulations in force.

## **Ethical commitment**

Ethical performance has zero tolerance and is not an option but instead plays a comprehensive role in our business. This Code does not establish particular matters about every subject but instead, stems from the reader's sound judgment. In the event of any doubt, the reader should ask:

- Does this situation make me feel uncomfortable?
- Does this situation feel improper to me?
- Do I feel these actions go hand-in-hand with the ethical principles established in this Code?
- Would my performance have a negative effect on others?
- How would I feel if I had to describe my performance to others?
- Which would be the consequences of my performance regarding the company and society?

Individual behavior has an impact on collective behavior and hence, upholding to a conduct that meets our Corporate Principles contributes to manage risks, to corporate coherence and has a positive impact on corporate dynamics.

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## **Our Primary Principles**

### **Fairness**

Fairness is understood as a fair and equitable treatment in labor, commercial and/or civic relations. Fair treatment for all people no matter their social, economic, racial, sexual and gender conditions.

### **Respect**

Acknowledging others and accepting them just the way they are. Beyond the legal compliance with the regulations and the agreements entered, this keeps in mind the points of view, needs and opinions of the parties.

### **Responsibility**

The clear intention of upholding all commitments by securing the goods of the Corporation and of its stakeholders.

### **Transparency**

The relations of the Corporation are based on knowledge and access to information, within the boundaries of the law and under business confidentiality.

## **Long-term relations**

We believe in and promote long-term relations. We reject doing business with individuals or corporations known for their social and corporate performance against the law, ethics and good practices, or whose legal standing or reputation are disputed.

## **Our suppliers**

At Grupo SURA, suppliers are individuals or corporations which provide goods or services to the Companies to fulfill organizational purposes.

All of our negotiations are conducted under our Corporate Principles, upholding ethical, environmental and social criteria, aimed to uphold the rights and duties of the parties. Hence, the Companies have internal policies to handling their suppliers, which go hand-in-hand with the guidelines of this Code.

## **Business practices - Actions with conviction**

How we gain results is as important as the results themselves. Consequently, establishing clear rules of behavior when facing issues that impact business management is necessary to guarantee coherence at all levels of Grupo Empresarial SURA.

### **1. Preventing Money Laundering**

The Sura Business Group is committed to the fight against money laundering and the financing of terrorism. This is why all our suppliers have a duty to comply with the procedures defined by the Companies for preventing this type of risk, applying the established controls, actively participating in the training processes and reporting anything they might consider suspicious or irregular through the channels established for this specific purpose.

Any reluctance to comply with the aforementioned duties may result in the unilateral termination of business relations by the Companies.

### **2. Preventing fraud**

We reject fraud in all its forms and therefore do not tolerate any act that affects the Companies, our shareholders, customers, employees or suppliers. Consequently, all suppliers have a duty to comply with the procedures established by the Companies for preventing fraud, applying the established controls, actively participating in the training processes and reporting anything they might consider suspicious or irregular through the channels established for this specific purpose. Suppliers must avoid engaging in any conduct that could be considered fraudulent, including, but not limited to, the following:

1. Presenting false or inaccurate information, as well as failing to provide truthful information when engaging with the Companies.
2. Misappropriating any property or asset, whether tangible or intangible, belonging to the Companies, shareholders, clients, employees or suppliers.
3. Engaging in any activity that affects, or is carried out for the purpose of affecting, the veracity, accuracy or timeliness of the Company's financial information disclosures, including, but not limited to, the following
  - Reporting financial information that is false, inaccurate or does not reflect the reality of the business or the contract entered into.
  - Altering the information recorded in the financial reports.
  - Accepting or making payments with the intention of performing acts of bribery or corruption, in any of its forms, or any other type that is considered illegal or prohibited under applicable legislation or our own internal policies.
  - Including in any contract or any other arrangement carried out with the Companies, figures or values that do not reflect the reality of the transaction or business therein represented.
  - Failing to opportunistically report any type of error or inconsistency with figures relating to supplier contracts or the services provided to the Companies.
  - In the case of suppliers offering services relating to the recording of accounting information or directly with financial reporting, failing to perform the assigned control activities or failing to report significant or material deficiencies with the internal controls in a timely manner

### **3. Preventing corruption and bribery**

We reject fraud in all its forms; in this sense, we do not allow relationships mediated by improper payments, kickbacks, promises and economic offers, employment offers or other benefits that may influence decision making and privilege individual interests.

Our business actions do not tolerate practices that undermine transparency and legality in the interaction between individuals, companies and institutions in the

public and private sectors. No business decision shall be mediated by the existence of any form of bribery or act of corruption

Both suppliers and their employees shall have a duty to report using the Ethics Hot Line any suspicion they may have of a possible act of corruption

#### **4. Human Rights**

We are committed to uphold Human Rights in every step of our businesses and to remedy those situations in which this respect was breached in any way by us. We are not accessories to vulnerabilities or affect the business activities in which we participate.

We uphold cultural diversity and encourage fair treatment while we actively participate in social development processes.

#### **5. Labor rights**

We are committed to comply with the Principles, Conventions and Recommendations of the International Labour Organization – ILO. We have zero tolerance for child labor, forced labor or conditions which go against the dignity, health and safety of employees or advisors.

Our suppliers shall create working conditions which meet our standards, promote fair compensation and establish sound practices in terms of development, work safety, social security and training.

We uphold the right to association and oversee healthy coexistence.

#### **6. Equal opportunities and non-discrimination**

Workers shall choose a job in a manner that is free, fair, with dignity and respect. Our suppliers shall reject any discrimination whatsoever in terms of employment and occupation. Discrimination is understood as any distinction, exclusion or preference based on race, color, sex, sexual orientation, religion, public opinion, nationality and

social origin, disease, age, disability, family responsibilities, and Union affiliation or activities.

## **7. Upholding the Law**

We comply with the laws that rule our industry, the internal regulations of the Companies and the settings in which we carry out our corporate activity, procuring that those who we relate to also meet the above.

## **8. Conflicts of interest**

Privilege is given to common interests over personal interests; we do not commit the integrity of our actions to obtain personal benefits and hence, we avoid any situation representing a conflict of interest in commercial and labor relations related to access to privileged information, capability to influence a decision, economic ties, among others.

Suppliers must report any possible situation that could generate a conflict of interest, both when executing the corresponding contract as well as providing their services. This same obligation shall apply when the supplier is authorized to subcontract the services to third parties.

## **9. Acquisition of goods and services**

The Companies have internal policies and guidelines provided to their employees and the public at large, related to purchase and hiring services. The duty of suppliers is to remained informed and to meet these guidelines, refraining from contracting in the event of any doubt.

For more information, refer to the Suppliers' Management Manual.

## **10. Gifts and entertainment**

We recognize that gifts and entertainment may be given in the normal course of business for the purpose of strengthening business relations. However, since this could well compromise or affect the criteria on which the recipient bases his or her decision, our suppliers and service providers must abstain from providing Company staff with such items.

Should our staff receive any gift or form of entertainment, he or she must inform the Ethics Committee or the body responsible for such function for the purpose of evaluating the situation and deciding what to do with the item.

Notwithstanding the foregoing, and for the sole purpose of facilitating our business dealings, we do allow our employees to accept invitations to attend academic events (conferences, seminars, training programs, etc.) or other events staged with the aim of getting to know the Company or a product offered by a third party. In such cases, the employee or officer must inform or be duly authorized by his or her superior, who shall consult the Ethics Committee when in doubt.

## **11. Environment**

We acknowledge the importance of joining efforts to care for the environment and developing strategies to mitigate the effects of climate change is paramount for sustainability. Our suppliers shall uphold the most stringent compliance of the applicable rules and laws, and at as responsibly and consciously as possible with their surroundings.

## **12. Free competition**

We do not participate in situations which undermine free competition nor create monopolies.



### **13. Companies' resources**

We are responsible for the proper use of the Companies' resources, including equipment, systems and other tangible or intangible goods such as information, specialized knowledge or other procedures related to the job. No equipment, systems or services may be used inappropriately or for any purpose which goes against the law or internal procedures, or puts at risk the reputation of the Companies or of third parties.

#### **Safeguarding, using and disclosing information**

Confidential or Privileged information is related to information that is owned by the Companies related to their products, processes, customers, collaborators, shareholders or suppliers, which is not public or is not expressly available to third parties.

The information provided by suppliers is protected under the highest confidentiality standards and applicable regulations in force, and is solely provided to third parties for legal requirements or part of the service provided convened, including confidentiality clauses.

Our suppliers must act in accordance with these guidelines, ensuring the security of both corporate and client information, while being under the obligation to avoid any improper use of privileged or confidential information regarding the Group's companies.

#### **Copyright and Intellectual Property**

The knowledge management and intellectual production rising from the course of the business shall uphold the corporate and legal provisions related to intellectual property and copyright. Grupo SURA does not allow the use of software or technological tools which do not meet legal licensing processes.

For more information, refer to the Intellectual Property Management Policy of Grupo Empresarial SURA.

## **Code of Conduct management**

Overseeing the compliance of the Code of Conduct is everybody's responsibility and hence, all employees, advisors, suppliers, customers, shareholders, investors and stakeholders have channels to report any situation which goes against the contents of this document.

When required by the Group's Companies, suppliers must provide certificates attesting to having disseminated and provided training with regard to our Code of Conduct among their direct and indirect employees (or subcontractors) who provide services to the Group.

### **1. Ethics Committees**

The Companies shall have Ethics Committees which consist of an odd number of members as provided in the internal regulations of the each Committee.

### **2. Ethics Hotline**

The Companies shall have an Ethics Hotline which is a confidential and safe communications channel used to report possible irregularities which go against the ethical principles of the Companies. These cases shall be analyzed by the Ethics Committee of each Company.

### **3. Principle of anonymity and non-retaliation**

The Ethics Committees shall maintain full reservation of the identification of the person providing information. Complaints may be made anonymously or directly. In the investigation processes, non-transparency of information is deemed as well as a breach of this Code.

#### **4. Sanctions**

Irregularities committed may lead to sanctions and even to the termination of the contractual relation. The above takes place without prejudice of the legal actions of civil or criminal liability which may derive.

The sanctions made by the Companies shall uphold the right to defense of the persons involved.

**WE HAVE ZERO TOLERANCE FOR UNETHICAL BEHAVIOR  
ETHICS ARE AN INTEGRAL PART OF EXERCISING OUR BUSINESSES.**

Grupo Empresarial SURA signed the U.N. Global Compact initiative which promotes sustainable development to implement 10 corporate management principles in the areas of Human Rights, Labor Standards, Environment and Transparency.

## **Human Rights**

Principle 1: Support and respect the protection of internationally proclaimed Human Rights.

Principle 2: Make sure they are not complicit in Human Rights abuses.

## **Labour Standards**

Principle 3: Uphold the freedom of association and collective bargaining.

Principle 4: Elimination of forced and compulsory labour.

Principle 5: Abolition of child labor.

Principle 6: Elimination of discrimination in respect of employment.

## **Environment**

Principle 7: Support a precautionary approach to environmental challenges.

Principle 8: Undertake initiatives to promote greater environmental responsibility.

Principle 9: Encourage environmentally friendly technologies.

## **Anti-corruption**

Principle 10: Work against any corruption in all its forms, including extortion and bribery.

We encourage our suppliers and contractors to act with responsibility and ethics, and to uphold the highest corporate standards honoring them throughout their supply chain.

## **ETHICAL COMMITMENT OF SUPPLIERS**

### **Grupo Empresarial SURA**

Grupo Empresarial SURA is committed to long-term relations, to processes that favor collective growth, and to common good and sustainability. Consequently, it acknowledges that its Suppliers are pivotal allies to meet its corporate purpose.

Competitiveness is achieved by developing responsible practices which qualify corporate dynamics, which give way to meet the expectations of different stakeholders and to adapt to changes in the setting. SURA wants to add wills and to build a joint commitment with its suppliers.

We invite you to be part of this commitment so that together we can be part of the consolidation of practices which allow us to be in force in the future.

We commit to comply with the Code of Conduct and the Suppliers Management Manuals of Grupo Empresarial SURA, and to disclose them among our employees.

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