

REGULATION ETHICS AND COMPLIANCE COMMITTEE

GRUPO DE INVERSIONES SURAMERICANA S.A.

PREAMBLE

In a System of Ethics and Corporate Governance, the ethical behavior of the people who are part of the Corporation comprises one of its fundamental pillars. Therefore, the Ethics and Compliance Committee of the Grupo de Inversiones Suramericana S.A. (Grupo SURA), observing the Corporate Group's Code of Conduct and Corporate Principles: Respect, Responsibility, Equity and Transparency, constitutes the highest authority that defines matters that diverge from the ethical behavior promoted by the Corporation.

The Ethics and Compliance Committee of the Grupo SURA also acts proactively by stimulating and strengthening the standards of ethical conduct both among internal staff and suppliers, shareholders and other stakeholders groups. To this end, it promotes an open channel for prior enquiries on actions that cause concern.

This regulation frames the Committee's actions, as the body that guarantees the ethical development of Grupo SURA's collaborators.

CHAPTER I

About the Ethics and Compliance Committee

Section 1 Conformation. The Ethics Committee shall consist of six (6) members who shall be the Vice-President of Corporate Affairs, the Vice-President of Corporate Finance, the Vice-President of Corporate Legal Affairs in his/her role as Compliance Officer. The Internal Auditor, the Director of Corporate Legal Affairs and the Director of Compliance shall attend the meeting as permanent guests, with voice but no vote. The Director of Compliance will also act as secretary of the meeting.

The Committee members shall act as long as they hold their posts to the interior of the Corporation. No fee will be paid for this work.

Section 2 Meetings. The Committee shall meet at least three (3) times a year or when circumstances so require, at the Corporation's registered address or at the place indicated in the call. You shall be summoned by the secretary.

Extraordinary meetings will be summoned at the request of any of the members of the Committee. There may be non-personal meetings or decision-making by virtual means in accordance with the rules in force.

Section 3 Minutes. The decisions of the Committee shall be recorded in minutes with consecutive numbering, and shall be undersigned by the attending members and the Secretary. The Minutes shall be kept in a book of Minutes administered by the General Secretariat of the Corporation.

The documents known by the Committee that support its decisions shall form an integral part of the minutes and shall be annexed thereto.

CHAPTER II

Functions of the Ethics and Compliance Committee

Section 4 Functions of the Committee: In addition to the functions contemplated in the SURA Corporate Group Code of Conduct, the following are the functions of the Ethics and Compliance Committee:

- a. Know and issue recommendations regarding the Organization's annual compliance plan.
- b. Update and monitor the application of the Code of Conduct's provisions.
- c. Determine the necessary actions for diffusion and education about the Code of Conduct and other standards of ethical conduct.

- d. Act as the highest authority for the resolution of conflicts of interest between employees, establish whether privileged information has been unduly used; authorize gifts and invitations outside the guidelines defined in the Code of Conduct.
- e. Determine whether there has been engagement in conduct contrary to corporate ethics.
- f. Act as a consultative body to solve concerns about ethical behavior on the part of employees. This function may be delegated to the Director of Compliance.
- g. Analyze the differences or conflicts of third parties that interact with Grupo SURA, i.e. customers, economic partners, suppliers, contractors, shareholders, etc., insofar as they are denouncers or affected people by unethical conduct.
- h. Evaluate and propose recommendations on programs for the prevention of fraud, corruption, cross-border and domestic bribery, money laundering and terrorist financing for Grupo SURA.
- i. Know and evaluate the implementation of the relevant monitoring and management policies and mechanisms for mitigating the Corporation's legal compliance risk.
- j. Know the compliance report that is presented annually to the Board of Directors of the corporation.
- k. Develop such other functions as may be assigned by the Committee.

CHAPTER III

Management of the Ethics and Compliance Committee

Section 5 Complaints. Ethics and Compliance Committee will be informed of the complaints that are made through the different channels that the company has arranged for employees, suppliers or any person to report any event that violates the ethical principles declared by the company. The mechanisms arranged by the company for this effect are the following:

- If the complaint comes from an employee, this can be addressed through their direct boss, formalizing the complaint by email or letter.
- Complaint directly to the email or to the Ethic Line determined for this type of matters: lineaetica@gruposura.com.co. These complaints may be anonymous or complainant-identified.
- Complaint through the website: [://www.gruposura.com](http://www.gruposura.com) on the link available for such purposes. These complaints may be anonymous or complainant-identified.

Complaints must be supported by reasonable, truthful and feasible grounds related to knowledge or suspicion of any fact that may violate the Corporate Group Code of Conduct or the principles and values established by the Company. They must be formulated in good faith, with the aim of solving a conflict of interest or a situation that threatens corporate ethics. It must never be motivated solely by a personal interest.

The reports of anonymous complaints received by e-mail or by the ethics line will be administered by the Vice-President of Corporate Legal Affairs or by a person from the Vice-President of Corporate Legal Affairs' team designated by the Vice-President of Corporate Legal Affairs, who will provide a report of all reports received in the Ethics and Compliance Committee whose source is Grupo SURA.

All reports of complaints received by any mechanism should be forwarded to the Ethics and Compliance Committee to determine if they are competent to undertake the corresponding investigation. If the Committee determines that the facts reported do not fall within its competence, it will refer them to the respective corporate body for its knowledge and management, i.e. to the Joint Committee on Occupational Health and Safety (*Comité Paritario de Seguridad y Salud en el Trabajo*, COPASST), the Committee on Occupational Coexistence, etc.

The Ethics and Compliance Committee shall report annually to the Corporation's Corporate Governance Committee on conflicts of interest presented by employees. These reports shall be kept with the minutes of the meetings of that body.

If the complaint received corresponds to an employee of Suramericana and Sura Asset Management or its subordinate entities, the Ethics and Compliance Committee of Grupo SURA will refer it to the respective competent Committee for its management.

Section 6 Investigation. Once informed of the complaint, the Ethics and Compliance Committee shall conduct the necessary investigation in order to verify the reported facts and issue a decision within ten (10) working days, a term that may be extended by the Committee.

The Ethics and Compliance Committee may hire external experts or specialized auditors to support the investigation and analysis of cases as well as to the collection of documentary or testimonial evidence it deems necessary. The Committee may use any evidentiary mechanism enabling it to obtain clarification of the facts complained of. Respect for due process and the implicated people's right of defense will be a fundamental premise in advanced investigations, as well as the independence and objectivity of the officials in charge of hearing and investigating the complaints presented.

The Committee may also seek advice from the different areas of the Company when it requires its knowledge and expertise. These areas will generate a report that will be input for the resolution of the case.

The costs involved in the complaints investigation will be covered by the Compliance area.

The Ethics and Compliance Committee shall keep a record of the complaints received, responses given and investigations conducted throughout the year. Said record shall be reviewed and analyzed at each of its meetings, and shall be recorded in the minutes of the respective meeting.

Section 7 Special investigation rules. Special rules are established for the management of complaints associated with employees who perform key control activities for financial reporting, including senior management.

- **Report to Audit and Financial Committee:** complaints associated with fraud in the financial report or any act of fraud committed by employees who carry out key control activities for the financial report, including Senior Management, must be brought to the attention of the Audit and Finance Committee, which will decide the treatment to be given to the investigation.

Likewise, the subsidiary companies must inform Grupo Sura's Audit and Finance Committee of complaints of the same nature that are presented against the same type of officers, including those that are reported in subsidiary companies.

If the denounced Director is part of the Audit and Finance Committee, he must abstain from participating in the management and definition of the complaint.

- **Report to Corporation's Corporate Governance Committee:** complaints involving collaborators who carry out key control activities for financial reporting, including Senior Management and members of the Board of Directors, that are not related to acts of fraud, must be brought to the attention of the Sustainability Committee and Corporate Governance, who will decide the treatment to be given to the investigation.

Similarly, subsidiary companies must inform Grupo Sura's Sustainability and Corporate Governance Committee of complaints of the same nature that are

presented against the same type of officers, including those that are reported in subsidiary companies.

If the denounced Director is part of the Sustainability and Corporate Governance Committee, he must abstain from participating in the management and definition of the complaint.

Section 8 Decision. The Ethics and Compliance Committee, based on the analysis and investigation of the complaint received, will issue a decision by which it will determine the measures, sanctions or corrective measures to be implemented if deemed necessary. This decision will be communicated by the Committee to the complainant (if known) and to the respondent.

The decision adopted by the Committee will be transmitted to the Human Talent Management of the Company, which will proceed with its imposition in accordance with the applicable legal procedures and observing the provisions of the Internal Labor Regulation.

Section 9 Reconsideration. The decisions of the Committee may be subject to review before the same Committee, within five (5) working days following the communication of the decision. The Committee shall decide on the review no later than ten (10) working days after receipt of the request.

Once this procedure has been concluded, the decision is final.

Section 10 Confidentiality. The members of the Committee, as well as any expert or adviser appointed by the Committee, shall keep the information as confidential to which they have access by virtue of their work. If the intervention of third parties is necessary, the members of the Committee shall inform them that the obligation of confidentiality shall extend to them.

The corresponding investigations should be conducted confidentially, allowing the exclusive disclosure of that data necessary to carry out investigations and corrective

actions that are required. The Ethics and Compliance Committee will maintain absolute confidentiality regarding the identification of the person making a complaint.

Section 11 No Retaliation. Complainants will enjoy special protection against any retaliatory actions taken by the Company, its officers or the members of the Ethics and Compliance Committee against them for making a complaint under the established parameters.

CHAPTER IV

Sanctioning Regime

Section 12 Sanctions. The Ethics and Compliance Committee, once the cases received have been analyzed and investigated, shall determine the measures or corrective measures to be implemented if deemed necessary.

When it is proved that an act reported to the Committee warrants the application of a sanction or corrective measure, this shall be established by a decision issued by the Committee and communicated to the complainant (if known) and to the respondent.

The irregularities committed may lead to the imposition of disciplinary sanctions such as verbal or written reprimand, suspension and even termination of the employment relationship or contract in the most serious cases, under the terms of the Internal Labor Regulations.

The decisions adopted by the Committee will be reported to the Human Talent Management of the Company to proceed accordingly.

Disciplinary sanctions or corrective measures shall be without damage to any legal action of civil or criminal liability. If the irregularity results in the imposition of a fine or pecuniary sanction against the Corporation, or the payment of compensation against it, the Corporation may repeat the sanction against the employee or collaborator whose irregular conduct led to the imposition of the compensation, fine or sanction.

CHAPTER V

Governance

Section 13. The preparation and amendment of this Regulation is responsibility of the Ethics and Compliance Committee of Grupo SURA, and must be approved and amended by the Board of Directors of the Corporation.