

KEY ETHICS AND COMPLIANCE INDICATORS

GRUPO SURA 2019

In Grupo SURA, how we gain results is as important as the results themselves. For this reason, we have a System of Ethics and Corporate Governance that promotes the management and compliance with our internal policies, ensuring that the organizational principles are present in all our actions

Our Ethics and Compliance Management System includes prevention, detection and remediation measures. Below we present the main indicators of the program during 2019.

1. [205] COMMUNICATION AND TRAINING

The training on ethics and compliance covered topics related to corporate principles (Equity, transparency, responsibility, respect), as well as the Business Group's Code of Conduct, which includes issues such as prevention of money laundering, fraud, bribery and corruption, conflicts of interest, free competition, among others.

A supplier awareness program was conducted in 2019, consisting of face-to-face training on ethics and corporate governance, as well as educational materials made available to all our suppliers through a website created specifically for this purpose.

% Relative to total number of	Coverage	Written acknowledgement	Training provided
Employees	100%	100%	100%
Contractors / Suppliers / Service Providers	100%	100%	100%
Subsidiaries	100%	100%	100%

In Grupo SURA we continue to implement the necessary mechanisms to achieve the acceptance of knowledge and commitment to compliance with the Code of Conduct by employees and suppliers.

2. [206] ANTI-COMPETITIVE PRACTICES

In 2019, none of the companies of the Business Group was sanctioned in terms of anticompetitive practices.

Fines and settlements	Fy 2019
Total amount	0
% of revenues	0%

3. [205-1, 205-3, 419-1] CONFIRMED INCIDENTS OF CORRUPTION AND ACTIONS TAKEN

In 2019, there were no cases of corruption or allegations of non-compliance with social and economics regulations. No other complaints of improper behavior were received by the Ethics Line or the Society's Ethics Committee.

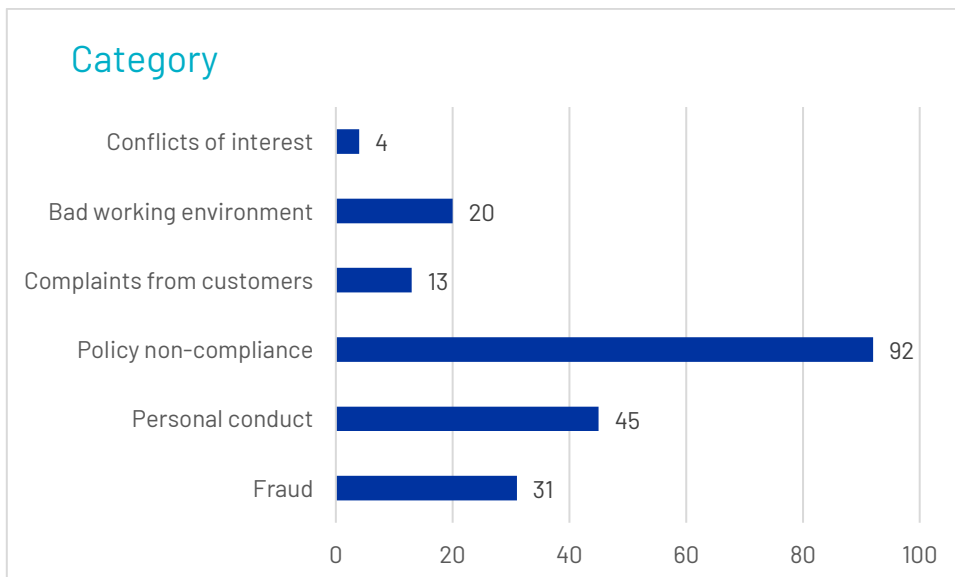
	Fy 2019
Total number of substantiated corruption & bribery cases	0

4. [102-17] REPORTING ON BREACHES

In 2019 the ethical channels continued being efficient mechanisms for our employees, suppliers or any other person to file reports associated with possible violations of the principles and internal policies.

Report 2019	
Total number contacts	838
Confirmed Breaches	205
Ethical consultations	82

Confirmed cases were classified in the following categories:



5. [205-3] DISCIPLINARY ACTIONS TAKEN

For each of the cases of non-compliance detected through the reporting channels, the disciplinary measures established in our internal policies and procedures were applied.

