

KEY ETHICS AND COMPLIANCE INDICATORS

GRUPO SURA

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 2020.

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 2020, consisting of virtual 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 2020, none of the companies of the Business Group was sanctioned in terms of anticompetitive practices.

Fines and settlements	2020
Total amount	0
% of revenues	0%

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

In 2020, 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.

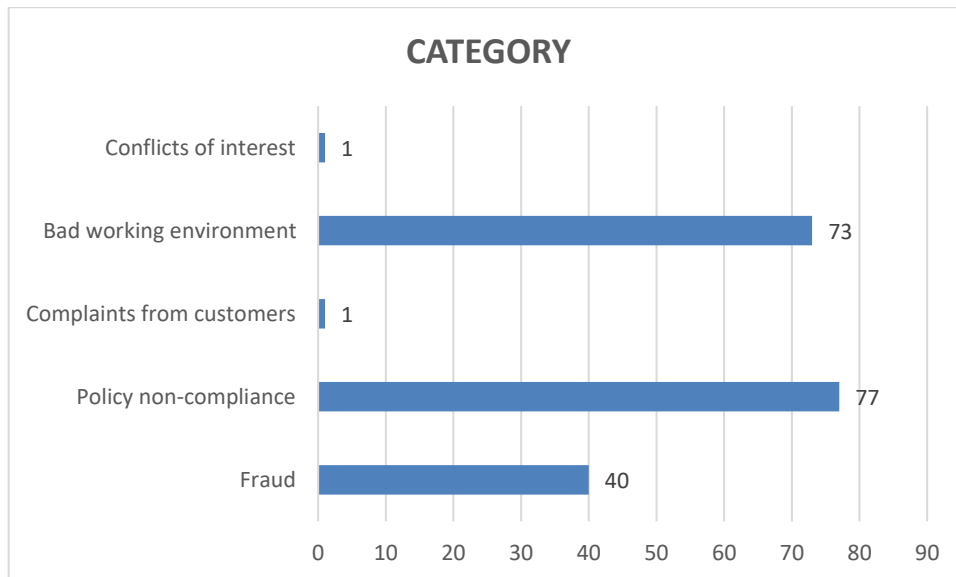
	2020
Total number of substantiated corruption & bribery cases	0

4. [102-17] REPORTING ON BREACHES

In 2020 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 2020	
Total number contacts	1.000
Confirmed Breaches	210
Ethical consultations	206

Confirmed cases were classified in the following categories:



Conflict of interest: a conflict of interest comprises a situation in which a employee of the Companies, due to their activity, faces different alternatives of Conduct related to their personal interests and those of the Companies, which are incompatible in terms of their legal or contractual obligations.

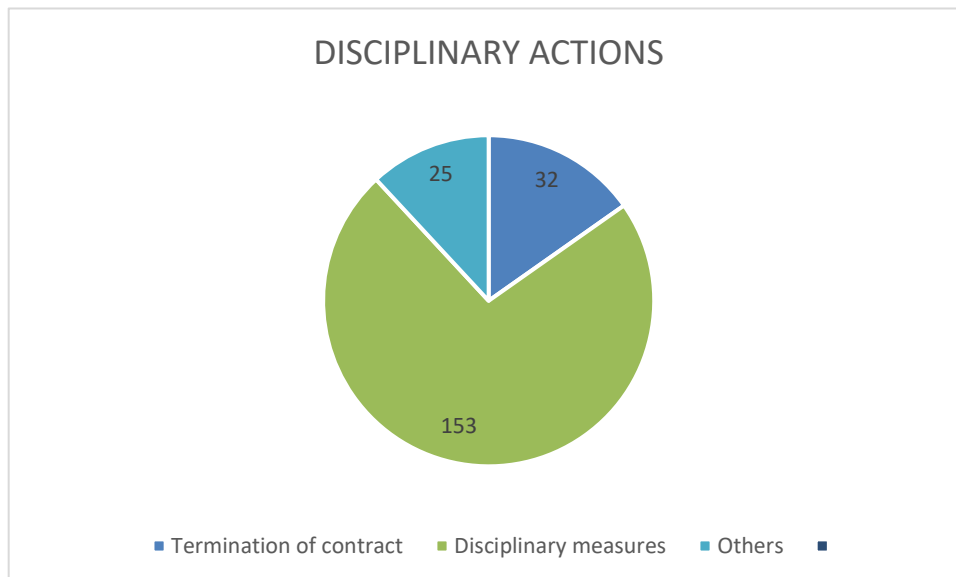
Bad working environment: situations related to employee relations, such as leadership, co-worker coexistence, workplace harassment, etc.

Complaints from customers: customer complaints related to non-compliance with corporate principles.

Policy non-compliance: events of non-compliance with internal policies, such as customer service, commercial policies, etc.

Fraud: any event involving misappropriation of resources, deception or concealment.

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. Disciplinary measures include written or verbal reprimands. Other measures may consist of improvement plans applied to the person involved, with human resources support.

6. External Audits

In 2020, the compliance systems of the companies Seguros de Vida Suramericana S.A. and Seguros Generales Suramericana S.A. in Chile were audited by an independent third party, which carried out the verification process in 5 stages: work planning, preliminary evaluation of the design, detailed tests and compliance and conclusion. The results were satisfactory in terms of compliance with the standards of each of the jurisdictions, mainly in terms of customer knowledge processes and hotline service.

For the Colombian companies Seguros de Vida Suramericana S.A. and Suramericana S.A. and for Grupo SURA, the company Ernst & Young Audit S.A.S. conducted a specific AML external audit. For the insurance companies, the result of the inspection was satisfactory with respect to the requirements of the standard; however, action plans were presented in terms of customer knowledge, training and segmentation of risk factors. In Grupo SURA there were no gaps.