

## **POLICY GOVERNING THE RIGHT TO DISCONNECT FROM WORK - GRUPO DE INVERSIONES SURAMERICANA S.A.**

Law 2191 of 2022, promoting the right to disconnect from work, establishes guidelines regarding the limits of the working day, in order to guarantee the effective enjoyment of free time and rest periods, sick leaves and/or other types of leave or vacations.

In the light of the above, the Company adopted this policy for the purpose of promoting a balance between family, personal and work life, as well as the appropriate use of technological tools that allow for communication at work.

### **1. Objectives:**

- a) To establish internal guidelines for exercising the right to disconnect from work, that is to say, to be disconnected during non-working hours, whether on vacation or on breaks, for matters relating to the work activity in question.
- b) To promote the effective enjoyment of free time, rest periods, leaves of absence, sick leaves, and/or vacations in order for employees to strike a balance between their personal, family and work lives.
- c) To define the channels and procedures that have been made available to the employee in order to present any complaint that he or she considers pertinent.

### **2. Scope:**

This policy is applicable to all employees of Grupo de Inversiones Suramericana. In turn, this policy shall be applicable to trainees who are performing their internship with the Company and shall also be extended to the Workers on Assignment who provide services at the Company's headquarters in accordance with the policy defined by the Contracting Temporary Service Company.

This shall apply to the following Companies:

- 1) Grupo de Inversiones Suramericana S.A.
- 2) The Suramericana Foundation

### **3. Legal basis:**

This policy is issued in accordance with the provisions of Law 2191 of 2022, the Substantive Labor Code and other rules and regulations that should complement, modify or develop said legislation.

#### 4. Glossary:

- a) **Right to disconnect from work:** this is the right that workers have to end the workday and use rest periods for personal activities that allow for a balance between work and personal life. In turn, it is the employer Company's obligation not to contact or require work to be done on the part of the employee during the employee's time off.
- b) **Working day:** is the time in which the employee must perform activities on behalf of the employer. The employer Company has several types of working hours, depending on the corresponding service and the role performed, in this sense, all employees are required to meet their maximum legal working hours and, if necessary, to work overtime, within the framework defined by the Company.
- c) **Availability:** this is the time required for the employee, even outside of his or her working day, to be attentive to whenever the employer Company should call in order to cover certain situations that require his or her attention.

#### 5. Guidelines:

- a) Employees and interns shall enjoy their right to disconnect from work during the following periods of time, once their workday is over: vacations, leaves of absence, sick leaves, and/or breaks.
- b) As a general rule, the employer shall refrain from requiring the employee or intern to work outside their working day or whenever they are enjoying their vacations, leaves of absence, sick leaves and/or breaks, by any means or tools such as calls, emails, text messages, communication platforms and/or chats. This is to ensure that they can adequately enjoy those periods of rest.
- c) Grupo SURA has established minimum coexistence agreements such as the "Hybrid Model" framework for all of the Company's employees and interns. These minimum agreements are contained in Grupo SURA's Flexiwork Benefit protocol.
- d) Failure to comply with the above guidelines may result in disciplinary measures being taken as contained in the Company's Internal Work Rules and Regulations.

#### 6. Exception:

The right to disconnect from work shall take into account the nature of the position, in this sense, the following shall not be subject to the policy of disconnecting from work when

there are exceptionally urgent situations, events of *force majeure* or unforeseeable circumstances, in which the employee is required to provide extra assistance to the Company.

## **7. Resolving complaints and disputes**

The employee may refer complaints relating to violations of the right to disconnect from work to the Ethics Helpline, where he or she shall receive respectful and confidential treatment, always with the intention of finding possible solutions.

Failure to comply with the right to disconnect from work may constitute workplace harassment, as long as it qualifies as being persistent and demonstrable, in accordance with that specified in Law 1010 of 2006, in this sense, if it involves situations defined as workplace harassment, the internal procedures defined for these purposes must be followed.

## **8. Governance and updates**

The approval, implementation and updating of this Policy shall be the responsibility of Grupo SURA's Human Resource Department. Any amendment hereto must be approved by this same authority.

## **9. Disclosure**

This policy shall be disclosed to all Grupo SURA's employees through the corporate mechanisms and means that are considered appropriate, provided that these are accessible to all of the Organization's employees.

## **10. Review frequency:**

This policy shall be reviewed every 2 years to assess the relevance of it being updated or supplemented. Likewise, the Chief Human Resource Officer shall be in charge of providing support to Leaders and employees in order to implement the measures required for due compliance with this Policy.

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