

# 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 2021.

### 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 2021, consisting of educational materials made available to all 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 2021, none of the companies of the Business Group was sanctioned in terms of anticompetitive practices.

Fines and settlements	2021
Total amount	0
% of revenues	0%

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

In 2021, 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.

	2021
Total number of substantiated corruption & bribery cases	0

#### 4. [102-17] REPORTING ON BREACHES

Grupo SURA and its subsidiaries have secured and confidential hotlines to report conduct that may contradict our ethical principles.

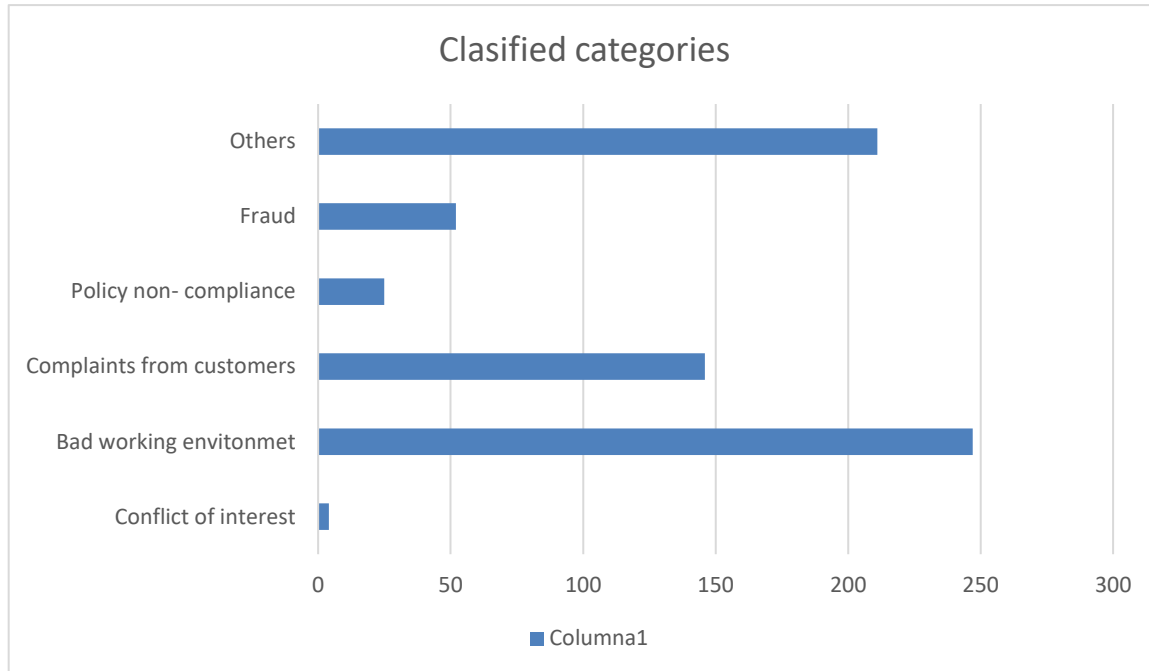
in accordance with international best practices in 2021 the Ethics Line was outsourced; EthicsGlobal, an independent thirdparty specializing in handling complaints and queries is in charge of receiving the complaints and the investigation and the respective management are carried out within the SURA Companies. The channels available to receive queries and complaints are as follows:

- Phone: 01-800-5189191
- WhatsApp: +52 55 6538 5504
- email: sura@sistemaetico.com F
- orm: sura.sistemaetico.com
- App: EthicsGlobal

No cases of corruption, bribery or anti-competitive practices were brought to the attention of Senior Management.

Report 2021	
Total number contacts	975
Confirmed Breaches	148
Ethical consultations	288

Confirmed cases were classified in the following categories:



**Conflict of interest:** a conflict of interest comprises a situation in which an 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.

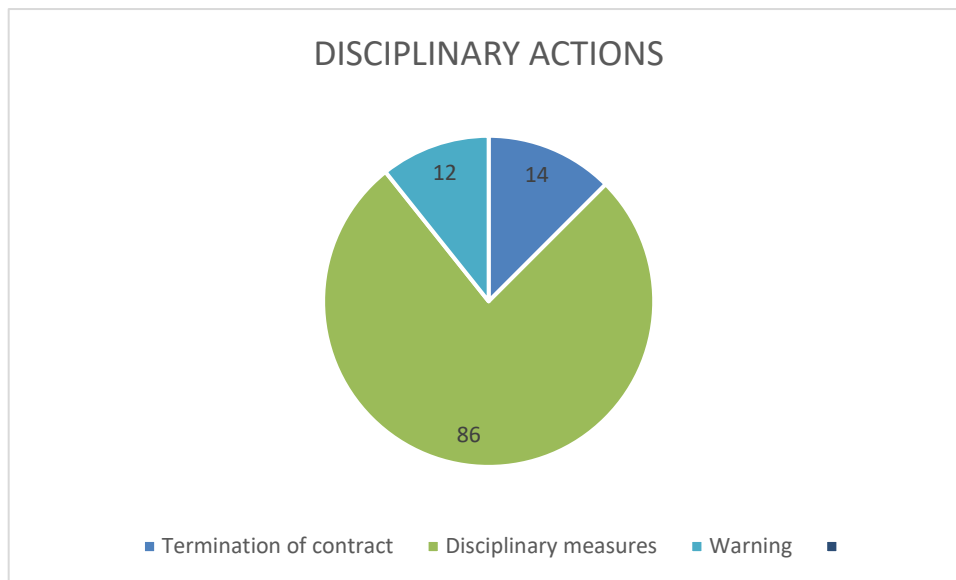
**Bad working environment:** situations related to employee relations, such as leadership, co-worker coexistence, workplace harassment, etc.

**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.

### External Audits

In 2021 and 2022, 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.

As a result of the review and verification procedures, applied to the aspects of customer knowledge, suspicious transaction reporting, implementation of risk management systems, training programs and activities related to AMLFT monitoring, significant progress was evidenced in the process of implementing SARLAFT 4.0 in the Colombian companies, however, some opportunities for improvement were identified, which were communicated to the Compliance Officer. In Grupo SURA there were no gaps.

Likewise, Transparency for Colombia, a chapter of Transparency International, conducted a measurement on corruption risk management carried out by Grupo SURA. The measurement focused on evaluating that the company had a starting point to guide the implementation of internal measures to support the policies and practices of corruption risk management. Grupo SURA obtained a satisfactory level of compliance, which means that it has significant developments in terms of internal guidelines and practices that contribute to effectively prevent, detect, sanction and avoid the recurrence of corruption risks and events.