

PROCEDURE FOR PREVENTING AND DEALING WITH SEXUAL HARASSMENT - GRUPO SURA

Grupo SURA is an organization committed to actively promote respect for human rights in its business activities, portfolio, and value chain. Writing and adopting this procedure embodies this commitment based on the corporate philosophy, and promotes the creation of new ways to provide respect and reparation for human rights. Sexual harassment in the workplace violates people's dignity, equality, and freedom, especially women, who are disproportionately impacted by this type of behavior.

Current regulations require companies to be jointly responsible with the State and society, for eliminating all forms of violence against women, and to guarantee their rights. The provisions found in Colombia's Political Constitution, Law 1257 of 2008 and the international law tools found in the Declaration about eliminating discrimination against women, the Convention about the elimination of all forms of discrimination against women (CEDAW), the Declaration about eliminating violence against women, the Inter American Convention to Prevent, Penalize, and Eradicate Violence against Women (Belém do Pará Convention), and the Beijing Declaration and Action Platform, determine the obligations which companies, as an active part of society, should fulfill to guarantee women's rights in the workplace. Case law has defined the scope of those obligations: rulings T-878 of 2014, T-012 of 2016 and T-140 of 2021 issued by the Constitutional Court, reiterate the importance of a commitment by the companies to eliminate all forms of violence against women in the organization.

Grupo SURA takes on the obligation of preventing and penalizing those acts that represent sexual harassment at work and, through this document, sets up a procedure for preventing and dealing with it, which takes into consideration the details of this problem and includes gender-focused investigations and procedures. The case law in reference has stated repeatedly that, to meet their human right obligations, companies must use due diligence, zero-tolerance, and zero repetition in managing the sexual violence cases that occur at work. This procedure ensures that dealing with sexual harassment cases is consistent with the corporate principles and the company's Ethics and Governance system and, at the same time, ensures a differential, gender-focused approach as required by law.

I. General Considerations:

- 1. Objective:** guide the prevention measures and set up a path to deal with sexual harassment cases within the organization.

2. **Scope and Area of Application:** This procedure may be applied to any individual linked to the organization, regardless of their work contract, dedication, role, or the modality in which they perform their functions. These measures will be processed as defined in this procedure of behaviors that represent sexual harassment, whether inside or outside Grupo SURA's facilities or the areas assigned to achieve the company's corporate purpose, while performing any activity derived from the contractual obligations of the individuals connected to the organization. If the actions occur outside these areas and activities, there will be processed according to the procedure if the people involved belong to Grupo SURA and their actions are related to their responsibilities as individuals connected to the organization.

3. Principles:

In addition to the principles that guide this Ethics and Corporate Governance system, the Company will establish the following principles to guide the actions used when applying this procedure:

- **Due diligence and joint responsibility:** Grupo SURA will act rapidly and with due diligence when receiving and processing any sexual harassment accusations, and will put in place actions to protect the person that files the complaint. In addition, this procedure will be disclosed and will ensure that the channels for receiving the complaints are accessible to everyone in the organization.
- **Zero-tolerance:** Actions that are defined as sexual harassment, as well as any other act of violence and/or discrimination against anyone in the organization, will not be tolerated.
- **No repetition:** Through the application of this procedure, Grupo SURA agrees to guarantee that sexual harassment actions will not be repeated.

4. Approaches:

- **Gender:** This starts by recognizing that there are people who have been historically discriminated for their gender, and that this situation requires a different treatment to achieve equality. This approach is intended to avoid making decisions on the basis of stereotypes but instead, based on an analysis of the evidence, to prevent repeating discriminating prejudices and conducts that re-victimize women.
- **Care:** This is aimed at ensuring that the application of this procedure guarantees respect for the rights of every party involved, and that the actions implemented do not cause harm, for instance, by delving unnecessarily into the sexual life of the person who raises the complaint, by confronting them against their will with the person.

5. Definitions:

- **Sexual harassment at work:** According to the European commission, this is defined as “A sexual type of conduct or other sex-based behaviors that affect the dignity of men and women at work, including actions by superiors and colleagues, and is unacceptable if: a. Such behavior is undesired, unreasonable, and offensive to the person to whom it is addressed; b. Refusal or noncompliance with such a behavior is used by the employer (including superiors and peers) is used explicitly or implicitly as the basis for a decision that affects such person’s access to professional training and employment, to continue on the job, their salary, or any other decision involving their job and/or; c. Such conduct creates an intimidating, hostile and humiliating work environment for the subject; and that such behavior can go, under certain circumstances, against the principle of equal treatment”.
- **Behaviors of sexual nature:** This includes behaviors related to the expression of human sexuality, and may be physical, verbal, or nonverbal.
- **Equal treatment:** Absence of discrimination or of a different treatment which cannot be reasonably justified.
- **Dignity:** This is the respectful treatment that is due to all persons and is based on their condition as humans.
- **Intimidating work environment:** Which inhibits people’s professional development by making them afraid to participate therein.
- **Hostile work environment:** Which is seen as adverse and in which a person feels vulnerable.
- **Humiliating work environment:** Which goes against the dignity of the people who are part of that environment.
- **Direct limitation of professional performance:** This is a limitation that hinders the performance of the assigned tasks and the achievement of a person’s professional objectives, and affects their motivation to perform their functions.
- **Indirect limitation of professional performance:** This is the limitation that impacts a person’s professional development by creating an environment that is unfavorable for achieving a person’s tasks and objectives.

II. Preventive actions

Grupo SURA is committed to implementing, among others, the following actions in order to prevent conducts defined as sexual harassment in the workplace:

- Spread messages questioning gender stereotypes and sexist prejudices.
- Train and educate every team in the organization, especially those responsible for dealing with sexual harassment, about the problem and its implications for the professional development of people in the organization.
- Prepare diagnostics to identify expressions of this problem in the organization, and make informed decisions for managing them.
- Promote the adoption of practices to manage sexual harassment in the workplace in every company that is part of the Business Group.
- Disclose preventive conducts throughout the organization, using the most appropriate means, among the individuals connected to Grupo SURA to internalize those practices.

III. Procedure for reporting and dealing with sexual harassment

1. **Receiving the reports:** The reports about sexual harassment at work will be addressed to the Ethics and Compliance Committee, and will be received through any of the methods set forth in that Committee's rules, to wit:
 - Reports filed through any of the channels of the Ethics Line: phone number: 01-800-5189191
 - WhatsApp: +52 55 6538 5504
 - Email: sura@sistemaetico.com
 - Form: sura.sistemaetico.com
 - EthicsGlobal app

These reports may be anonymous or identify the reporting party. In the former, the reporting party must indicate the time, manner, and place of the events to ensure the principle of contradiction.

2. **Conducts that might represent crimes or violations against external rules:** In the event that the facts indicated in the report are conducts that could be considered a crime according to Colombian law, such as, violent carnal knowledge, abusive sexual acts, and others, the report will be dealt with according to the legal procedure, and the facts will be reported to the authorities, as appropriate.

- 3. Preferential hearing by the Ethics and Compliance Committee:** The Ethics Committee will deal preferentially with the cases of sexual harassment in the workplace to ensure that they are dealt with using a gender-based approach and according to the applicable regulations. In the event that the report involves someone in senior management, the Sustainability and Corporate Governance Committee will be notified.
- 4. Ad hoc Committee:** If the person being reported (the person against whom the complaint is made) refrains from participating in any activity related to the case, the Committee must appoint the third member who must be part of the President's Committee.
- 5. Manner of dealing with the complaint:** Grupo SURA has established three routes to process reports involving sexual harassment:

 - a. Alternative:** The procedure under this path is intended for the alleged perpetrator to acknowledge the conduct, establish reparation methods, and guarantees that it will not be repeated. The alternative path may only be used if requested by the person filing the complaint. The objective of this type of management is to make the alleged perpetrator aware of the seriousness of their conduct and of the importance of changing their behavior. Under this method, direct dialogue between the person filing the complaint and the alleged perpetrator will only be possible if expressly requested by the person filing the complaint.
 - b. Disciplinary:** Using this manner, the procedure indicated in section V of this document is initiated.
 - c. Legal:** In the event of violent behaviors that surpass the scope of this procedure, Grupo SURA will advise the person filing the complaint to use the methods established under the law to hear their case, and will provide legal counsel for this process.
- 6. Protection measures:** regardless of the route used to deal with the report, Grupo SURA will implement appropriate measures to protect the person filing the complaint from possible retaliation, and will make sure that there are immediate containment and protection measures taken. Among other actions, the organization may:

- Offer emotional contention measures for the person filing the complaint
- Provide psychological counsel for the individuals involved
- Offer legal counsel to the person filing the complaint
- Make reasonable adjustments to the contractual terms of those involved to avoid being in the same space until the procedure has been completed.

IV. Procedure to deal with cases of sexual harassment in the workplace

- 1. Establish protective measures:** After the complaint has been received, the Ethics and Compliance Committee will determine the appropriate protection measures and will notify the people involved. The measures will be implemented immediately and will remain in force until the procedure has been completed.
- 2. Investigation:** The Ethics and Compliance Committee will start an investigation to verify the facts that have been reported, and issue a decision within five (5) working days. This term may be extended by the Committee one-time only.
- 3. Guidelines for the investigation:** In order to reflect the gender approach, the Ethics Committee will consider the following guidelines to investigate the facts and to provide its decision:
 - avoid re--victimization of the person filing the complaint
 - not base its decisions on discriminatory stereotypes
 - prefer indications over direct evidence, when the latter are insufficient
 - take on the function of transforming their decisions
- 4. Decision:** Based on an analysis and investigation of the complaint received, the Ethics and Compliance Committee will issue a decision that determines the measures, penalties, or corrective measures, if the Committee deems it necessary. The decision will be notified by the Committee to the person filing the complaint, if known, and the person against whom the complaint was made. The Committee's decision will be communicated to the Company's Human Talent management which will enforce the decision according to the applicable legal procedures, and the provisions of the internal work regulations.
- 5. Reconsideration:** The Committee's decisions may be appealed before the same Committee, within three (3) working days after the decision has been notified. The Committee must decide on the appeal within a maximum of five (5) working days as of the date in which the appeal is received. After this procedure is completed, the decision will be final.

6. Confidentiality: Members of the Committee and any advisor thereof, must keep in strict confidence any information to which they have access as a result of their work. If any third parties need to be involved, the Committee members are obliged to notify them that the obligation of confidentiality will include them also. All investigations must be carried out in strict confidence, and the only information that may be disclosed is what is required to carry out the investigation and any required corrective measures. The Ethics and Compliance Committee will keep strictly confidential the identity of the person who filed the complaint.

The confidentiality obligation for the actions derived from the protocol are defined as an extension of the obligation set forth in the work contracts, and under no circumstances may it be considered as a waiver by the alleged victim to talk about the event¹. It is important to remember that, when starting the procedure, the parties involved, that is, the Committee and the personnel in charge of applying the procedure, the person filing the complaint, and the person against whom the complaint is filed, is advised of their obligations. The limitations to the scope of confidentiality must be specified in a written communication signed by the parties.

7. No Retaliation: Individuals who file a report shall have special protection from any kind of retaliatory action that the company, the company members, or those who are part of the Ethics and Compliance Committee might take against them for the mere fact of filing a report according to the existing parameters.

8. Penalties: After the reports have been received and analyzed, the Ethics and Compliance Committee will determine the steps or corrective measures to be implemented, if needed. When an action reported to the Committee is deemed to merit the application of a penalty or corrective measures, such penalty or corrective action will be specified in the decision issued by the Committee. The decision will be notified to the person filing the complaint (if the person is known) and the person against whom the complaint is filed.

Any sexual harassment actions may lead to the application of disciplinary measures, such as verbal or written warnings, suspension, and even the termination of the employment or contractual relationship in more serious cases, according to the Internal Work Rules.

9. Determining the penalty: When determining the penalty, the Ethics and Compliance Committee should consider whether the action is repetitive and/or recurrent, and the existence of prior processes and corrective measures. In addition to the specific penalties, and if the reported individual remains in the organization, the Committee will determine measures to guarantee that the action is not repeated.

¹ The implications for this issue are described in the FAQ section, "what is escache?"

10. Guarantee of reparation and non-repetition: After the process is completed, the person filing the complaint may indicate the reparation desired. The Committee will determine the appropriateness of the action which, under no circumstances may violate the dignity of the party responsible nor involve paying money, and the Committee will confirm the reparation action.

V. Final provisions

- 1. Not retroactive:** If the report refers to actions that took place before this procedure became effective, Grupo SURA will process the report according to the guidelines of the Ethics and Corporate Governance system in force when the events took place. Compliance with these regulations will guarantee a gender-based approach in keeping with the principles of due diligence, zero tolerance, and non-repetition.
- 2. Measures for suppliers:** Since the scope of this Procedure is limited to people directly connected to Grupo Sura, the *inhouse* service providers must perform an audit to ensure that they implemented procedures or protocols for dealing with and preventing sexual harassment in the workplace as required by current regulations. In addition, contracts between Grupo Sura and suppliers must include a clause in which the supplier expresses its commitment to eliminate these kinds of actions by guaranteeing the principles of zero tolerance, due diligence, and non-repetition

VI. Governance

The Compliance Directorate and Human Talent Management are responsible for updating and disclosing this procedure. Any changes thereto must be approved by the Ethics Committee.