

KEY ETHICS AND COMPLIANCE INDICATORS

GRUPO SURA

In Grupo SURA, the way 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 2023.

1. [206] ANTI-COMPETITIVE PRACTICES

In 2023, none of the companies of the Business Group was sanctioned in terms of anticompetitive practices.

Fines and settlements	2023
Total amount	0
% of revenues	0%

2. [205-1, 205-3, 419-1] CONFIRMED INCIDENTS OF CORRUPTION AND ACTIONS TAKEN

In 2023, there were no cases of corruption or allegations of non-compliance with social and economics regulations.

	2023
Total number of substantiated corruption & bribery cases	0

3. [102-17] REPORTING ON BREACHES

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

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

- Phone:
 - Brasil 800-8923-392
 - Chile 0800-914-501
 - Colombia 01-800-5189191
 - México 800-04-38422
 - Panamá 836-5888
 - Perú 0800-78424
 - República
 - Dominicana 200-9643
 - Uruguay 000-416-205-6395
- WhatsApp: +52 55 6538 5504
- email: sura@sistemaetico.com
- Form: sura.sistemaetico.com
- App: EthicsGlobal

During 2023, these were the confirmed cases reported through the ethics line by category:

Category	Grupo SURA	Suramericana	SURA Asset Management	TOTAL
Discrimination	0	1	1	2
Sexual harassment	0	1	3	4
Corruption and bribery	0	0	0	0
Privacy protection	0	1	1	2
Conflict of interests	0	33	0	33
Money Laundering and Terrorism Financing	0	1	0	1

4. [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 Sura Asset Management and Suramericana, during 2023, the Corporate Audit Unit audited the Self-Control and Comprehensive Risk Management System for Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction applicable for the companies, with a sufficient result.

Likewise, at the regional level, audits were carried out on corporate governance and compliance, reviewing aspects such as personal investment policies, compliance policy and money laundering and terrorist financing, among others.

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.