

**INTEGRATED SYSTEM FOR THE PREVENTION AND CONTROL OF MONEY
LAUNDERING AND TERRORIST FINANCING – SIPLA (BY ITS ACRONYM IN
SPANISH)**

**GRUPO DE INVERSIONES SURAMERICANA S.A.
NIT 811.012.271-3**

We hereby certify that Grupo de Inversiones Suramericana S.A., hereinafter the “Company,” complies with the guidelines and mechanisms established by the Financial Superintendence of Colombia (Superintendencia Financiera de Colombia) regarding the prevention and control of money laundering and terrorist financing.

The Company has adopted the Integrated System for the Prevention and Control of Money Laundering and Terrorist Financing – SIPLA – in accordance with the provisions of the Legal Basic Circular (Circular Básica Jurídica) issued by the Financial Superintendence of Colombia, Part III, Title I, Chapter VII, and other External Circulars issued by said authority. Consequently, the Company has implemented policies, controls, and procedures aimed at preventing its operations from being used as a means for concealing, managing, investing, or exploiting in any way money or other assets derived from illicit activities, or for giving the appearance of legality to such activities or to related transactions and funds.

In addition, we have rules of conduct that are mandatory and have been approved by the Company’s Board of Directors. It is the obligation and responsibility of all employees to strictly comply with the regulations established in the SIPLA Manual and the Code of Conduct.

Likewise, the Company has implemented due diligence processes to identify and understand the third parties with whom it establishes relationships. These processes are applied at the time of onboarding and are updated periodically. Additional procedures are conducted for third parties identified as Politically Exposed Persons (PEPs), among others. The information collected is stored in accordance with the legal requirements and is available to authorities for consultation and investigation purposes, as is the documentation related to suspicious transactions.

As part of the SIPLA management process, independent reviews are conducted to identify corrective actions that support continuous improvement. The Board of Directors is informed periodically about the outcomes of SIPLA management so that this governing body may provide the recommendations and measures it deems appropriate for effective risk management.

Additionally, considering that the Company’s shares are dematerialized, securities intermediaries are required to implement money laundering and terrorist financing risk management processes for investors acquiring securities issued by Grupo SURA. These processes must comply with the instructions set forth in the Legal Basic Circular issued by the Financial Superintendence of Colombia for entities under its supervision.

Similarly, other entities such as the Central Securities Depository of Colombia – DECEVAL, in its capacity as administrator of the Shareholders' Register, and Fiduciaria Bancolombia S.A., the entity responsible for shareholder services, carry out additional procedures related to money laundering and terrorist financing risk management, particularly regarding validations against binding lists in accordance with applicable regulations.

Leandro Alarcon López
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Chief Compliance Officer
Grupo de Inversiones Suramericana S.A.