

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 of our internal policies, ensuring that the organizational principles are present in all of our actions.

Our Ethics and Compliance Management System includes prevention, detection, and remediation measures. Below we present the main indicators of the program during 2024.

1. [206] ANTI-COMPETITIVE PRACTICES

In 2024, none of the companies of the Business Group was sanctioned in terms of anticompetitive practices.

Fines and settlements	2024
Total amount	0
% of revenues	0%

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

In 2024, there were no cases of corruption presented.

	2024
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: +1 (805) 590-4460
- email:sura@sistemaetico.com
- Form: sura.sistemaetico.com
- App: EthicsGlobal

During 2024, these were the confirmed cases reported through the ethics line by category:

Category	Grupo SURA	Suramericana	SURA Asset Management	TOTAL
Discrimination	0	0	0	0
Sexual harassment	0	8	1	9
Corruption and bribery	0	0	0	0
Privacy protection	0	0	0	0
Conflict of interests	1	1	1	3
Money Laundering and Terrorism Financing	0	0	0	0

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, improvement plans applied to the person involved or termination of the employment agreement.

External Audits

In Sura Asset Management during 2024, the Corporate Audit Unit audited the ethics and compliance system.

Regarding Grupo SURA, Transparency for Colombia, a chapter of Transparency International, conducted a measurement on corruption risk management. 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.

Also, the Corporate Audit Unit evaluated the design and implementation of Grupo SURA's ethics and compliance program by assessing the fulfillment of the roles and responsibilities of the program's stakeholders. The objective was to ensure that cross-cutting elements such as governance and risk management were effectively integrated, and to validate the effectiveness of key controls included in Grupo SURA's behavioral risk matrix.