

GRUPO DE INVERSIONES SURAMERICANA S.A.

RULES AND REGULATIONS GOVERNING THE SHARE REPURCHASE PROGRAM

The Board of Directors of Grupo de Inversiones Suramericana S.A., in exercise of its legal and statutory powers, and in accordance with the authorization granted by the General Assembly of Shareholders, having previously taken into account the following

CONSIDERATIONS

- 1.** That Grupo de Inversiones Suramericana S.A. (hereinafter the “Company” or “Grupo SURA”) is a publicly-traded corporation with both ordinary shares and non-voting, dividend bearing preferred shares registered with the Colombian National Securities and Issuers Registry (*Registro Nacional de Valores*) and listed on the Colombian Stock Exchange (*Bolsa de Valores de Colombia*).
- 2.** Whereas on September 10, 2026, the General Assembly of Shareholders held an Extraordinary Meeting at which:
 - (i) it approved a share repurchase program for the Company’s ordinary and preferred dividend-bearing, non-voting shares, for an amount of up to five hundred billion Colombian pesos (COP 500,000,000,000), to be carried out during the period from the date on which the Board of Directors approves these Rules and Regulations through to March 31, 2028 (the “Share Repurchase Program”).
 - (ii) it approved the partial reallocation of three hundred and sixty-three billion two hundred and twenty-three million five hundred and eighty four thousand and seven hundred and thirty-one pesos (COP 363,223,584,731) from non-taxable occasional reserves to the share repurchase reserve, which, when added to the available balance of one hundred and thirty-six billion seven hundred and seventy-six million four hundred and fifteen thousand two hundred and sixty-nine pesos (COP 136,776,415,269) currently held in the share repurchase reserve, brings such reserve to a total of five hundred billion pesos (COP 500,000,000,000) to be used to implement the Share Repurchase Program
 - (iii) it authorized the Board of Directors to establish the Rules and Regulations governing the Share Repurchase Program and, therefore, to define and approve its terms and conditions, including, without limitation, the mechanism through which the transactions or orders comprising the Share Repurchase Program shall be executed, and, generally speaking, to undertake all those procedures and activities aimed at implementing the Share Repurchase Program in accordance with the terms of these Rules and Regulations as well as applicable laws and regulations.
 - (iv) it authorized the Board of Directors to delegate to the Company’s legal representative the authority to determine the date, the number of shares, and/or the amounts for which the repurchase transactions shall be carried out, within the limits approved by the General Assembly of Shareholders.

3. These share repurchases must be carried out using available profits, in respect of fully paid-up shares, and at a price determined based on technically recognized procedures and in accordance with applicable laws and regulations.

The Share Repurchase Program shall be governed by the provisions of these Rules and Regulations as well as applicable laws and regulations, particularly Articles 396 and 417 of the Colombian Commercial Code, Article 42 of Law 964 of 2005, paragraph 3 of Article 6.15.2.1.2 of Decree 2555 of 2010, the General Rules and Regulations of the Colombian Stock Exchange (“BVC”), and the BVC’s Single Circular.

4. This Share Repurchase Program must be implemented serving the Company’s best interests, with due regard to the appropriate allocation of capital, promoting market transparency, distributing value to shareholders, and making every effort to preserve share liquidity.
5. This Share Repurchase Program may be executed through one or multiple transactions, using the mechanisms provided by the Colombian Stock Exchange (BVC), including its trading systems and/or the independent mechanism, in accordance with applicable laws and regulations.

RESOLVES

To approve the Rules and Regulations for Grupo SURA’s 2026 Share Repurchase Program (the “Rules and Regulations”) under the following terms:

ARTICLE ONE Purpose and Scope. These Rules and Regulations establish the terms under which the Share Repurchase Program shall be implemented and executed. This Share Repurchase Program shall include any orders or offers to repurchase shares that the Company decides to carry out during its entire term, in accordance with the provisions of these Rules and Regulations, regardless of the mechanism used.

ARTICLE TWO. Maximum Value of the Share Repurchase Program and Source of Funds. The aggregate value of the transactions executed under the Share Repurchase Program shall not exceed five hundred billion pesos (COP 500,000,000,000). Share repurchases shall be funded from the share repurchase reserve set up with the Company’s net profits, in accordance with Article 396 of the Colombian Commercial Code.

Should the Company’s Board of Directors determine that the appropriate internal or market conditions do not exist in order to carry out these share repurchases, the Company shall not be obliged to implement the Share Repurchase Program, either in whole or in part.

ARTICLE THREE. Shares Subject to the Share Repurchase Program. Ordinary shares and/or dividend bearing, non-voting preferred shares as issued by the Company (the “Shares”) may be subject to the Share Repurchase Program, provided that these are fully paid up and meet the conditions of free transferability required by the applicable mechanism.

ARTICLE FOUR. Maximum Number of Shares. The maximum number of Shares to be repurchased shall be the number such that, when multiplied by the price paid for the Shares in the respective

repurchase transactions, the cumulative value of the Share Repurchase Program does not exceed the maximum value set forth in Article Two, namely, five hundred billion pesos (COP 500,000,000,000).

The Company shall not be obliged to repurchase a minimum number of Shares.

ARTICLE FIVE. Validity. This Share Repurchase Program may be implemented and executed as of the date these Rules and Regulations were approved by the Board of Directors through to March 31, 2028. The expiration of this term shall not affect the settlement, clearance, or fulfillment of transactions validly entered into or orders validly placed during such period.

ARTICLE SIX. Execution Mechanisms. This Share Repurchase Program may be implemented in Colombia through the trading systems and/or the independent mechanism provided by the Colombian Stock Exchange (BVC). Each method shall be subject to applicable rules and regulations. The selection of a mechanism shall not require its exclusive use throughout the term of this Share Repurchase Program. This Share Repurchase Program may be implemented and executed through one or more transactions, as determined by the Company's Senior Management and/or by a committee designated by Senior Management.

ARTICLE SEVEN. Repurchase Price. The repurchase price for each class of Shares shall be set in compliance with the regulations applicable to the respective execution mechanism, the provisions of these Rules and Regulations, and based on technically recognized procedures.

ARTICLE EIGHT. Eligible Participants in this Share Repurchase Program. The holders of the Shares.

ARTICLE NINE. Powers Granted to the Company's Senior Management and/or a Committee Designated by Senior Management.

The Company's Senior Management and/or the committee designated by Senior Management shall be granted the broadest powers to perform the following functions, always in strict compliance with applicable laws and regulations, these Rules and Regulations, and the internal rules established by these:

1. To determine, together with the advisors they should designate for that purpose, the strategy for implementing and executing the Share Repurchase Program;
2. To define the class or classes of Shares to be repurchased in each repurchase transaction;
3. To define the mechanism(s) for carrying out the Share Repurchase Program;
4. To determine, directly or through a third party, the price at which each repurchase transaction under the Repurchase Program shall be carried out, using a technically recognized procedure;
5. To determine the amount and date, directly or through a third party, of the repurchase transactions;
6. To select the brokerage firm(s), advisors, or intermediaries it deems appropriate for the proper execution of the Share Repurchase Program;
7. To make available the share repurchase reserve for implementing the Share Repurchase Program;
8. To carry out the Share Repurchase Program in the Company's best interests, with due regard to the appropriate allocation of capital, promoting market transparency, distributing value to shareholders, and making every effort to preserve share liquidity; and
9. To enter into all legal acts necessary or appropriate to implement, perfect, and execute the Share Repurchase Program, including, without limitation, obtaining any permits required from the

competent administrative authorities and, generally speaking, carrying out any other procedures or activities associated with or related to this Share Repurchase Program.

ARTICLE TEN Disclosure of Information. The Company shall promptly comply with its relevant information and any other disclosure requirements as required by applicable laws and regulations, taking into account the particular mechanism used to carry out the Share Repurchase Program.

ARTICLE ELEVEN Effects of the Share Repurchases. While the repurchased Shares are held by the Company, the rights attached to such Shares shall be suspended. The Company shall update the number of outstanding shares and make the corresponding accounting, corporate, and market records. The subsequent disposition of the repurchased Shares shall be decided by the competent body and shall be subject to Article 417 of the Colombian Commercial Code as well as other applicable regulations. These share repurchases do not constitute a public tender offer, in accordance with paragraph 3 of Article 6.15.2.1.2 of Decree 2555 of 2010.

Approved in Medellín at a meeting of the Board of Directors held on September 24, 2026

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