

HUMAN TALENT MANAGEMENT POLICY —Grupo SURA—

Introduction and Objective

Grupo de Inversiones Suramericana S.A. (hereinafter “Grupo SURA”) is the parent company of a group of companies that are convinced of the importance of human development, safety and the quality of life in the workplace. Acting within the framework of our guiding principles, namely Equity, Respect, Transparency and Responsibility, Grupo SURA promotes the growth of our human talent, aware of the importance of being a more competitive company and attracting, developing and retaining the personnel we need to manage our business and carry out our Strategic Planning.

Our conviction that our human talent is at the heart of our business management involves Grupo SURA defining and establishing a framework of action and engagement with our employees, where the development of the Business Group and of each of its companies also entails the comprehensive development of our human talent. The Company places a lot of importance on the human element with particular emphasis on integrity and the corporate values which form part of our organizational culture.

Grupo SURA fully complies with, respects and applies the Colombian legal system with regard to the relationship we maintain with our employees. We promote teamwork, a service-oriented attitude, the promotion of lifelong learning, respect for our differences and individuality, non-discrimination, creating long-term relationships with our work teams as well as our human qualities; we strive to retain employees who are characterized by their optimism, persistence, flexibility, creativity, innovation and constant ethical behavior.

Scope and framework of application

This policy applies to all Grupo SURA's employees, and in particular to all those occupying managerial positions, or who carry out functions relating to matters concerning people management.

Guidelines

Attracting and retaining human talent here in Grupo SURA is approached from the following fronts:

SKILLS: Our skills model covers Knowing, Being, Wanting and Doing and allows us to identify individual contributions on the part of our work teams so as to be able to achieve a greater degree of inter-connectedness and complementarity

PERFORMANCE: We evaluate the performance of our employees and how they contribute to achieving the goals set by the Company.

COMMITMENTS: We strive to enhance our employees' emotional commitment as a key factor for retaining our human talent and furthering our performance, both on an individual and organizational level.

HIGH POTENTIAL EMPLOYEES AND SUCCESSION PLANS: We identify, develop and train all those employees that offer the skills, commitment and willingness to aspire to a position of greater responsibility.

DEVELOPMENT: We understand employee development as strengthening their skills and knowledge and helping them to gain experience.

LIFE / WORK BALANCE: We address this issue from the standpoint of providing flexible working hours, employee support and advice, family services and fringe benefits.

HUMAN TALENT PLANNING: This goes hand in hand with the Organization's strategy in identifying needs in this regard, based on the capacity and the projected growth of our different lines of business

INCLUSIVE LEADERSHIP. We pursue a leadership style that is inclusive, participative and inspiring, so that each employee has the opportunity to express him or herself and find in the Company the vehicle that allows them to achieve their personal and professional aspirations.

As part of the Company's commitment to the International Labor Organization's (ILO) Declaration of Fundamental Principles and Rights at Work; the Universal Declaration of Human Rights and the United Nations Global Compact, we have adopted the following Labor Principles in order to further human development and quality of life: Their application extends to Grupo SURA and the companies belonging to the SURA Business Group, and also constitutes a guiding instrument for analyzing or developing new investments:

1. Upholding human dignity without discriminating against race, religion, gender, job function, economic, sexual or political orientation.
2. Acting in strict compliance with all applicable legislation, rules and regulations while helping to build a fairer, more equitable society.
3. Condemning forced labor, child labor or any other form of work that goes against a person's integrity and human dignity.
4. Giving priority to treating people well, acting with Respect, Responsibility, Equity and Transparency in the Company's relations.
5. Encouraging open dialogue, freedom of expression and timely, clear, ample and sufficient information.
6. Respecting human rights and ensure that we are never complicit in violating these rights in terms of our labor and commercial relations.
7. Guaranteeing a decent wage or salary, in line with the Company's results, the rest of the industry as well as the local job market.
8. Striving to further the personal and professional development of our employees, this as a way of ensuring our business continuity in the long term.
9. Respecting freedom of association and recognize the right to collective bargaining.
10. Promoting safety, health and well-being in the workplace.

Governance

The approval of this policy is the responsibility of Grupo SURA's Board of Directors, upon the recommendation of the Appointments and Remuneration Committee, or the body acting in its stead. Any amendment hereto must be approved by this same corporate body. The area responsible within the Company for the handling of this policy is the Department of Corporate Affairs.

Disclosure

This Policy shall be published on Grupo SURA's website where it shall remain updated. Likewise, Grupo SURA shall disclose this policy among its employees, in accordance with the procedures and mechanisms deemed appropriate for this purpose and that ensure its effective compliance .
