

## FRAMEWORK FOR ACTION IN HUMAN RIGHTS —Grupo Empresarial SURA—

Grupo SURA recognizes the importance of having a Human Rights strategy to properly manage possible violations. Thus, it has determined this framework that will serve to state a clear position on this matter and perform its role as an investment manager and active owner through continuous dialogue with the companies in its portfolio, and the exchange of knowledge in the event of human rights violations.

This document comprises the following:

1. A commitment that allows various stakeholders to know the company's position on human rights and the main approaches used to manage them.
2. A risk management process that provides a schematic understanding of how the risks of human rights violations should be identified, analyzed, assessed, and managed.
3. Human rights management guidelines that allow the definition of management strategies associated with each type of human rights risk identified.

### COMMITMENT TO HUMAN RIGHTS

Grupo SURA recognizes the transforming role companies play on the territories where it operates through the impacts and branches of its companies. This implies assuming a commitment to be co-responsible for the construction of collective solutions to the challenges that we share as a society.

Consequently, and in keeping with its higher purpose of creating well-being and harmonious development for people, organizations, and society, Grupo SURA is committed to **actively promote respect for human rights in its operations, portfolio, and value chain**, from the formalization of actions developed within the framework of our corporate philosophy and the construction of new ways of respecting and repairing human rights. This commitment is a challenge and an opportunity to continue generating value for the organization and its stakeholders.

Based on its own understanding of this matter, the company will participate in, and lead initiatives to advance the understanding and evolution of human rights, considering the social dynamics that imply changes in the forms of relationships, and in the understanding of the people's well-being, considering its interaction with the environment.

This commitment is based on the guidelines of the Universal Declaration of Human Rights, the Guiding Principles on Business and Human Rights of the United Nations, the principles established in the Declaration of Fundamental Rights at Work, of the International Labor Organization (ILO) alongside general and sector-specific international standards, such as the United Nations Global Compact, the United Nations Principles for Responsible Investment, and the United Nations Principles for Sustainable Insurance.

## Scope

This commitment applies to Grupo SURA as an investment manager, and its objective is to declare the Company's position about respect for human rights, develop its understanding, determine approaches for its treatment, and strengthen the relationship with other companies in the Business Group to align their management. The commitment consists of the following components: governance, strategy, risk management, and metrics.

## Governance

Grupo SURA has a Sustainability Governance that allows it to establish the necessary structure to assign roles and responsibilities in different areas of the company. Grupo SURA is committed to managing issues related to human rights through the government defined for sustainability issues, as follows:

The Board of Directors is the highest management body for issues related to ESG criteria, and is responsible for defining the general sustainability strategy that will guide the practices of the Business Group. In this sense, it will be in charge of ensuring that the company has the necessary resources to manage sustainability, monitoring the application of policies and applying the various metrics and indicators established for this purpose, including management and monitoring risks and opportunities on environmental, social, and corporate governance matters.

The Board of Directors must incorporate these criteria in the orientation and follow-up of the Company's strategy, in the monitoring of the financial statements, its risk management, and in the analysis and follow-up of any other issues that may be related or impacted. For the above, the Board of Directors relies on its Sustainability and Corporate Governance Committee.

On the other hand, the Administration is responsible for implementing the sustainability strategy, including respect for human rights in its operations, portfolio, and value chain. Additionally, it must facilitate building capacities at different levels of the Organization, and the report to the Board of Directors, among others. In addition, the administration participates in the Board of Directors of the portfolio, as well as internal work and discussion groups and with the subsidiary companies. These instances are established mechanisms for assisting with the implementation of the practices.

## Strategy

Companies in the financial sector, in addition to having strategies that allow them to guarantee respect for human rights in their operations, must also adopt mechanisms to avoid possible violations through third parties, such as the companies in which they invest, their suppliers, or their clients.

Hence, Grupo SURA, as an investment manager, approaches the human rights strategy from two perspectives. On the one hand, respect for human rights must be guaranteed in day-to-day operations and, on the other hand, Due Diligence mechanisms must be implemented to avoid possible violations in the value chain and the portfolio.

Taking into account the above, and considering the long-term vision of the company, whose impacts and risks in Human Rights are largely in the way in which the companies in its portfolio manage them, Grupo SURA is committed to maintaining an active and regular dialogue with the Companies that represent a material investment in the portfolio, through the various instances established for the purpose, in order to:

- Design due diligence processes in clients, investments, and suppliers according to sector exposures and risk levels, by industry.
- Periodically evaluate the impact on human rights through diagnostic mechanisms, such as surveys, focus groups, and other spaces for dialogue with stakeholders.
- Promote commitments of respect for the human rights of company employees, customers, and suppliers.
- Incorporate measures to prevent and mitigate impacts on human rights in the relationship with customers, suppliers, and employees..
- Monitor performance in human rights through indicators.
- Participate in various scenarios for strengthening public dynamics in the field of Human Rights, through work with centers and think tanks, adherence to mechanisms of collective engagement, and cooperation in spaces for the exchange of knowledge.

## Risk Management

The objective of human rights violation risk management is to have elements and information to be able to contribute to decision-making and to deal with the impacts that the company may have on the different subjects of rights. For this reason, Grupo SURA has a process for the identification, analysis, and management of the possible impacts on human rights associated with its value chain, portfolio, and operations.

On the one hand, risks that may arise through third parties are analyzed from the perspective of an investment manager, who must ensure the sustainability of their portfolio. Therefore, Grupo SURA implements risk management from various complementary perspectives, including, but not limited to:

1. Direct exposure from the operations of the portfolio companies.
2. Exposure in Industries from which the companies' revenues come.
3. Economic sectors of the investment portfolios.

On the other hand, the company performs ongoing evaluations and diagnoses in its operation, through third parties and internal mechanisms, to identify possible situations of direct violation and implement the corresponding mitigation measures.

Grupo SURA updates these analyzes every three years or sooner, considering material changes in the operation. The evaluation methodologies and tools will be adapted taking into account the context of the company, and will follow the process detailed in the "Guidelines for the Management of Human Rights Violation Risks" document.

## Metrics

Based on the identification, analysis, and evaluation of the risks of human rights violations, Grupo SURA is committed to determining monitoring indicators based on the recommendations about best practices and international benchmarks. The metrics you will focus on are the following:

- Reported, analyzed, closed, and confirmed incidents of human rights violations, and the respective corrective actions taken.
- Number of controversial human rights cases in investment processes.

## HUMAN RIGHTS RISK MANAGEMENT PROCESS

Managing the risks of human rights violations is part of the overall risk management process of Grupo SURA, which includes the following treatment stages:

### 1. ID

Grupo SURA, being a financial services company and having a portfolio focused on this same sector, recognizes that, in addition to understanding and evaluating the risks associated with its operations, it is necessary to incorporate a vision of sectoral exposure derived from its portfolio, which includes, but is not limited to, the following outlook:

- Direct exposure through portfolio companies..
- Industries from which the income of the portfolio companies comes.
- Investment portfolio industries.

Once the sectors in which there is some exposure are identified, the main human rights risk practices associated with each are investigated, based on different sources that include international standards, frameworks, and benchmark companies. This allows building a complete list of practices that represent indirect risks of violation.

For the risks of violation derived from the direct operation, the identification is made through primary sources that allow identifying facts, findings and perceptions of employees and other interest groups. To guarantee transparency and independence, a third party will be responsible for carrying out the human rights impact assessment process.

### 2. Analysis and prioritization

The objective of this stage is to deepen the understanding of the previously identified risk practices, prioritize those for which action plans must be designed for mitigation, according to the nature of the company.

For indirect risk practices, a risk level is assigned according to the procedure defined for the management of this type of risk. For direct risk practices, the analysis methodology defined by the third party accompanying the process will be implemented.

### 3. Management, monitoring, and reporting

Based on the above analysis, management strategies must be defined, based on the human rights management guidelines document, for those sectors and practices that are prioritized. Additionally, monitoring indicators must be established that allow changes in the level of risk to be evaluated and the relevant variations to be communicated to the different interest groups.

## GUIDELINES FOR HUMAN RIGHTS INFRINGEMENT RISK MANAGEMENT

As part of the human rights violation risk management process, in addition to carrying out the identification, analysis, and prioritization process, it is necessary to establish management guidelines for those practices and sectors that are prioritized.

This document aims to establish cross-cutting and specific guidelines based on the practices identified and analyzed:

## **Cross-cutting guidelines**

- Evaluate and diagnose the possible risks of human rights violations, direct and indirect.
- Implement measures to mitigate the risks of human rights violations in the portfolio companies.
- Follow up on the plans and commitments established for mitigation.
- Design and periodically implement initiatives for dialogue, training, reflection and research that seek to raise the level of awareness regarding possible violations of human rights..

## **Guidelines by type of risk**

Direct risks: Refers to those risks of infringement directly associated with the company's operation and the relationship with its stakeholders. For this type of risk, the following activities must be carried out:

The company must implement measures that guarantee the non-violation of the human rights of employees. According to the violation risk analysis, special emphasis should be placed on health and safety, free association, non-discrimination, and privacy protection. At the same time, it must guarantee that forced labor, child labor, workplace and sexual harassment, and the censorship of opinions and positions are not incurred.

Additionally, it must ensure that the human rights of customers, shareholders, and suppliers are not violated. In particular, it must guarantee non-discrimination in business and contracting practices and the protection of privacy.

It does this through:

- Internal regulations: The company considers in its internal regulations, associated with the management of human talent, customers, and suppliers, all the practices mentioned to prevent and manage possible violations.
- Training: The company has training plans to promote a culture of respect for human rights, among suppliers and employees, with an emphasis on the practices mentioned. Specifically, it implements training measures for the committees defined to make decisions regarding violations of the code of conduct.
- Diagnostic mechanisms: The company has processes to assess the status of human rights among employees, customers, and suppliers, such as engagement, culture, psychosocial risk surveys, and periodic impact assessments.
- Monitoring of indicators: The company defines management indicators to monitor prevention, mitigation, and remediation plans for possible human rights violations.
- Instances or mechanisms for reporting and management: The company defines channels and instances to report and investigate alleged violations of the rights of employees, suppliers, and customers, such as the ethics hotline, the workplace coexistence committee, and the ethics committee, among others. Additionally, for confirmed cases of violation, disciplinary measures are implemented in line with the company's code of conduct.
- Audit: The company has processes to verify the effectiveness of the internal systems implemented for the management of human rights..

Indirect risks: Refers to those risks of infringement that can materialize through third parties to whom the company is related, such as clients, investors, and suppliers. For this, the company must have due diligence processes for the prioritized sectors, taking into account the risk practices identified for each. Due diligence must take into account the processes for identification, evaluation, due diligence and human rights action plans.

## **Related regulations**

Both the measures to manage direct risks and the due diligence processes are developed within the framework of our regulatory structure that makes up the company's ethics and compliance system, and which includes the following internal policies:

- Responsible Investment Framework Policy
- Social Investment Framework Policy
- Due Diligence Manual for Mergers and Acquisitions operations
- Code of conduct
- Suppliers' Code of Conduct
- Anti-Fraud and Anti-Corruption Framework Policy
- Data protection policy
- Manual of procedures for the System for the Prevention and control of Asset Laundering and Terrorist Financing
- Labor principles (Human Talent Policy)