

**PROTOCOL FOR THE PREVENTION AND ATTENTION OF SEXUAL HARASSMENT IN THE  
WORKPLACE  
SURA ASSET MANAGEMENT S.A.**

SURA Asset Management S.A. (hereinafter "SURA AM" or the "Company") is an organization committed to the active promotion of respect for human rights in the development of its businesses, portfolio and value chain. The formulation and adoption of this procedure materializes this commitment from the corporate philosophy and promotes the construction of new ways of respecting and repairing human rights.

Violence, in its various forms, limits the recognition, enjoyment and exercise of rights and disregards human dignity. In addition, it has reached a structural level that transcends from the personal to the social, legal, political and economic. Sexual harassment in the workplace is a practice that threatens the dignity, equality and freedom of people, especially women, who are disproportionately affected by this type of conduct.

The current regulations require companies to assume in a co-responsible manner with the State and society, the duty to eliminate all forms of violence against women and to guarantee their rights, as well as to observe the duties of due diligence, non-tolerance and non-repetition in the attention to cases of sexual violence that arise in the workplace.

SURA AM assuming the obligation to prevent and punish conducts constituting sexual harassment in the workplace and through this document establishes a prevention and care procedure that considers the particularities of this problem and that integrates investigation and processing mechanisms with a gender approach.

**I. OBJECTIVE**

Prevent and address situations of sexual harassment in the workplace and gender-based violence against:

- a. Company employees.
- b. SURA suppliers and partners.
- c. Any person or interest group that is a victim of sexual harassment in the course of their relationship with the Company.

To this end, this protocol establishes the guide to take preventive and care measures that seek to make visible and avoid this problem that affects women and people in general in their diversities.

**II. SCOPE**

This Protocol applies to any person related to the Company regardless of their contractual regime, their dedication, the role they perform and the modality under which they exercise their functions.

Conduct constituting sexual harassment that occurs inside or outside SURA AM's facilities or the spaces intended to carry out its corporate purpose will be processed in accordance with the provisions of this protocol.

### III. PRINCIPLES

In addition to the corporate principles of respect, fairness, transparency and responsibility, the Company will observe the following principles in the implementation of this Protocol:

- a. **Due diligence and co-responsibility:** the Company will act quickly, observe the standards of due diligence in the reception and processing of complaints of sexual harassment in the workplace and will implement protective actions for the complainant. It will also disclose this protocol and ensure that the care routes are accessible to all people in the organization.
- b. **Zero tolerance:** behaviors that constitute sexual harassment in the workplace, as well as any conduct of violence and/or discrimination against any person in the organization will not be tolerated.
- c. **Non-retaliation:** whistleblowers will enjoy special protection against any manifestation of retaliatory actions that may be adopted by the Company, the people who are part of it or those who are part of the Ethics and Compliance Committee against them, for the fact of making a complaint under the established parameters.
- d. **Non-repetition:** non-repetition of sexual harassment behaviors in the workplace.
- e. **Confidentiality:** people who have access to situations of sexual harassment in the workplace, as any person who provides advice, must keep the information to which they have access confidential by virtue of their work. If the intervention of third parties is necessary, they have the duty to inform them that the obligation of confidentiality will be extended to them. The corresponding investigations must be carried out confidentially, allowing only the disclosure of data necessary to carry out the investigations and the corrective actions that are required. The Ethics and Compliance Committee shall maintain absolute confidentiality regarding the identification of the person making a complaint, unless the person authorizes its disclosure for the relevant purposes.

### IV. DEFINITIONS:

- a. **Employment Discrimination:** *any differentiated treatment for reasons of race, gender, age, family or national origin, religious creed, political preference or social situation that lacks any reasonableness from a labor point of view.*<sup>1</sup>.

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<sup>1</sup> art. 74 Law 1622 of 2013

Direct discrimination occurs when an explicit distinction, preference or exclusion of a collaborator is established for one or more reasons.

Indirect discrimination refers to situations or practices that appear to be neutral but have a negative effect on people who belong to a particular group.

- b. **Discriminación de género:** distinción, exclusión o restricción basada en el sexo que tenga por objeto o por resultado menoscabar o anular el reconocimiento, goce o ejercicio por la mujer, independientemente de su estado civil, de los derechos humanos y las libertades fundamentales en las esferas política, económica, social, cultural y civil o en cualquier otra esfera.
- c. **Gender discrimination:** distinction, exclusion or restriction based on sex which has the purpose or effect of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field.
- d. **Equal treatment:** absence of discrimination or differential treatment that cannot be reasonably justified.
- e. **Sexual harassment at work:** Sexual harassment at work is a form of violence against a person that affects their dignity and is unwanted. It is conduct of a sexual nature or other behaviors based on sex that affect the dignity of people at work.  
Sexual harassment includes sexual behavior such as physical contact and advances, sexual remarks, display of pornography, and sexual, verbal, or factual demands; likewise, any act of persecution, harassment or harassment, of a sexual, lewd or libidinous nature or connotation. This type of behavior can be humiliating and can constitute a health and safety problem; it is discriminatory when the person who suffers from it has sufficient reasons to believe that his refusal could cause problems at work, including hiring or promotion, or when it creates a hostile work environment.

Sexual harassment in the workplace can have, among others, the following manifestations:

- **Blackmail, condition of employment, or quid pro quo:** The harasser takes advantage of his position to ask for sexual favors in return. Any behavior (verbal or non-verbal) of a sexual nature that is offensive and unwanted by the recipient, accompanied by a direct conditioning of an aspect of the employment relationship, in which the harasser may or may not comply with the said conditioning.

- **Sexual harassment generating a hostile or offensive work environment:** the behavior (verbal, non-verbal or physical conduct) of the aggressor creates an intimidating, humiliating, offensive, threatening or disruptive work environment for the recipient, an action that is not conditional. Faced with the possibility of being harassed, virtual stalking situations are created that produce fear in the harassed subject.

## V. Measures

In line with existing recommendations and best practices, the Company applies the following measures to address sexual harassment in the workplace:

- Preventive:** that consider the causes of violence and not only its effects.
- Specific:** that each case may be evaluated individually according to its conditions.
- Multiple:** in the sense that different types of responses or measures need to be combined.
- Timely:** intervention plans or measures must be established to contain the effects of violence.
- Participatory:** It involves the participation of company managers, colleagues and the victims themselves.
- Long-term decisions:** Given that the consequences of violence also manifest in the long term and that, therefore, immediate measures may be complemented.

## VI. CONDUCTS THAT CONSTITUTE SEXUAL HARASSMENT

Including but not limited to, the following non-tolerated behaviors or conducts constitute sexual harassment:

- Suggestive and/or unpleasant remarks, comments about the appearance, aspect or sexual condition of the worker and deliberate verbal abuse of libidinous content.
- Denigrating or obscene ways of addressing a person.
- Teasing, joking, comments or uncomfortable questions with sexual connotations.
- Questions, descriptions, or comments about sexual fantasies, preferences, and abilities/abilities or about sex life.
- Obscene gestures, whistles or immodest looks.
- Cornering or deliberately seeking to be alone with the person unnecessarily.
- Unsolicited and deliberate physical contact, such as rubbing and touching, or unnecessary physical approach with sexual connotations.
- Persistent invitations to participate in social or recreational activities, even if the person who is the subject of these has made it clear that they are unwanted and inappropriate.
- Invitations or pressure to arrange dates or sexual encounters.

- j. Demands or requests for sexual favors, whether or not they are directly or indirectly related to a professional career, the improvement of working conditions or the preservation of the job;
- k. Communications or messages by any means, physical or virtual, of a sexual and offensive nature.
- l. Use and/or display images, graphics, vignettes, photographs or drawings of sexually explicit or suggestive content.
- m. Spreading rumors about people's sex lives.
- n. Forcing the performance of activities that do not fall within their functions or other disciplinary measures for refusing proposals of a sexual nature.
- o. Physical aggression of a sexual nature.

It is presumed that the conduct was committed in the work context when it is carried out at:

- a. The workplace or where the contractual relationship is developed in any of its modalities, including in public and private, physical and digital spaces when they are a space to develop the assigned obligations, including working from home, remote work and teleworking.
- b. Places where remuneration is paid because of work or work entrusted to them in any of the contractual modalities, where they take their rest or where they eat, or where they use sanitary or toilet facilities and in changing rooms within the work context.
- c. Travel, travel, events or social or training activities related to work, or the work entrusted to them in any of its modalities.
- d. Within the framework of communications that are related to work or the work entrusted in any of its modalities, including those made digitally or using other technologies.
- e. On the journeys between the home and the place where the work or the work entrusted in any of its modalities is carried out, when the sexual harassment is committed by a person who is part of the work context.
- f. In the accommodation provided by the employer, when the sexual harassment is committed by a person who is part of the work context.

**VII. CONDUCT THAT DOES NOT CONSTITUTE SEXUAL HARASSMENT**

- a) Acts intended to exercise the disciplinary power that legally corresponds to hierarchical superiors, and their demands that are not based on sexual condition or discrimination based on sex or gender.
- b) Reasonable requirements of employment loyalty and business and/or institutional loyalty.
- c) The formulation of circulars, memoranda, warnings, aimed at requesting technical or service requirements and/or improving efficiency and/or work performance, provided that they are not based on discriminatory criteria.
- d) The request to participate in extra duties of collaboration with the company, to maintain the continuity of the service, and/or ensure the continuity of the company and its operation.

- e) Actions contained in the disciplinary process, or in the investigation, investigation, request for explanations for the verification of faults or sanctions, or for the termination of the employment contract, with or without just cause.
- f) The requirements to comply with the obligations, duties and prohibitions enshrined in the regulations, contracts, policies or circulars of the company.

**VIII. COMPANY OBLIGATIONS:**

- a) Carry out awareness-raising activities on sexual harassment and its consequences, aimed at all levels of the company, to reject these practices and support the dignity and integrity of people at work.
- b) Train and prepare the organization's teams, especially those responsible for dealing with cases of sexual harassment in the workplace, on the problem and its implications for the professional development of the people in the organization.
- c) Carry out training activities on conflict resolution and development of social skills for agreement and negotiation, aimed at management levels and those who perform functions derived from this Protocol, which allows them to mediate in situations of sexual harassment in the workplace.
- d) Carry out periodic monitoring and surveillance of sexual harassment in the workplace using instruments that have been validated for this purpose, guaranteeing the confidentiality of the information.
- e) To develop activities aimed at fostering social support and promoting positive social relationships among the Company's employees
- f) Identify and assign responsibility for dealing with this type of cases to a governing body within the organization.
- g) In the event of a situation of sexual harassment in the workplace, inform the victim of his/her right to go to the competent authorities, such as the Attorney General's Office.
- h) At the request of the victim, immediately forward the complaint and report to the competent authority, respecting their right to privacy.
- i) Refrain from carrying out acts of censorship that disregard the guarantee of the victims to publicly make acts of sexual harassment visible and refrain from carrying out acts of revictimization.

j) Guarantees of protection. Victims or third parties who become aware of the fact of sexual harassment in the workplace shall have the right to be protected from possible retaliation for filing a complaint and making known the acts of harassment, by means of the following guarantees:

- Treatment free of gender stereotypes, sexual orientation or gender identity.
- Visit the Occupational Risk Administrators to receive emotional and psychological care.
- Request transfer of the work area.
- Permission to telework if there are risky conditions for the victim.
- Avoid carrying out tasks that involve any interaction with the person under investigation.
- Terminate the employment contract, or the existing contractual relationship, by the worker or contractor, when expressly stated to do so, without any penalty for prior notice.
- Maintain the confidentiality of the victim and his/her right to non-confrontation

k) Action guidelines from the gender perspective: the Company will adopt decisions with a differential approach, thus seeking to establish equality between the sexes in the workplace, in such a way as to seek the elimination of asymmetrical relationships. To this end, the Company will consider the following guidelines for action:

- Refrain from attributing roles or positions based on the person's sex.
- Correct actions or language in communication that contribute to perpetuating stereotypes or sexualizing people.
- Promote respect for diversity and inclusion in work environments.
- Carry out analysis on the incidence or frequency of sexual harassment in specific population groups to take special measures that contribute to the mitigation of these behaviors against that group.
- Conduct training among employees on the importance of respect for gender identity in the workplace.
- Carry out training among employees on the importance of equality of people for the prevention of discriminatory behavior based on people's sexual identity.

## **IX. OBLIGATIONS OF COLLABORATORS**

- a) To maintain good conduct in all respects and to provide a spirit of special collaboration in the moral and disciplinary order, avoiding initiating, participating in or promoting any type of violence, including that of sexual connotation.
- b) Strictly observe the provisions established in the company's internal work regulations, the Code of Conduct and this Protocol.

- c) Act with respect towards their co-workers, superiors, customers, suppliers, allies and their dependents.
- d) Seek complete harmony and intelligence with co-workers, superiors, subordinates, and with suppliers and allied companies, in personal relationships and in the execution of tasks.
- e) Be truthful in all cases.
- f) Do not use acts of physical and/or verbal violence, insulting expressions, hostile comments aimed at denigrating other co-workers, superiors or subordinates, instill fear, intimidation, terror, anguish, generate de-motivation, cause work damage or induce the resignation or termination of a third party, co-worker, boss or subordinate.
- g) Refrain from engaging in conduct that constitutes sexual harassment or violence.
- h) Act truthfully, with dignity, loyalty, in good faith and with impeccable ethical and moral behavior.
- i) The other obligations established in the Internal Work Regulations.

#### **X. MECHANISM FOR REPORTING CASES**

The person who considers himself affected may, if he/she wishes, go to the Company, so that the Company, at the Main office of the Ethics and Compliance Committee, can process the relevant inquiries and procedures. Whoever resorts to this mechanism will always be treated with respect with the intention of finding possible solutions to the conflict. The procedure will be confidential and reserved. The complaint and attention procedure will be developed in accordance with the provisions of the Ethics and Compliance Committee Regulations, the Regional Ethics Line Policy, the Ethics Management Procedure, and will be in accordance with the following stages:

**First: Sending and receiving the complaint.** Complaints of cases of sexual harassment in the workplace will be channeled through the Ethics Line so that it can be known at the headquarters of the Ethics and Compliance Committee, under the following parameters:

- a. The complainant will seek that, between the occurrence of the event and the reporting of the same, the shortest amount of time has elapsed.
- b. When submitting the complaint to the Ethics Hotline, the complainant shall ensure that it contains:



- Identification of the complainant and the other persons involved in the facts.
  - Clear and detailed description of the facts with their chronological order.
  - The evidentiary support that is wished to assert.
- C.** These complaints may be anonymous or by identification of the person (victim) complainant. In the case of the former, the complainant must establish the circumstances of the time, manner and place of the events in order to guarantee the principle of adversarial proceedings and due process.

**Second: Protection and Care.** Once the complaint is received, the Compliance area, in coordination with the Human Talent area, will establish the relevant protection measures, which will be applied immediately until the case has been addressed, such as:

- Emotional containment measures
- Counseling
- Legal advice

**Third: Verification and analysis.** The Compliance area will carry out the investigation in accordance with the provisions of internal regulations and will inform the Ethics and Compliance Committee on a preferential basis of cases of sexual harassment in the workplace to ensure that they are addressed with a gender approach and in accordance with applicable regulations.

In addition, it will carry out activities aimed at verifying, supported by the evidence of the case, the circumstances in which the events have occurred, for which it will meet with each of those involved, trying to hear their versions and allowing them to provide new evidence, and will leave a record of each of these proceedings in the minutes.

To guarantee due process to the parties involved, the summon issued to the person involved must be prior, indicating the date, time and place of the proceeding and must contain the description of the facts, and the evidence that has been used by the complainant.

In those cases, in which the investigations lead to the conclusion that it is necessary to activate the procedure for verifying faults and imposing sanctions, the procedure provided for in the internal work regulations will be followed.

All persons who are linked to a procedure, whether as complainants, defendants or witnesses, must maintain strict confidentiality of the matter. The services of third parties specialized in the development of the research may be hired, if confidentiality and the protection of the rights of the people involved is guaranteed.

In the event of a conflict of interest in relation to the whistleblower and the areas in charge of carrying out the investigation or the acting body for decision making, the measures for the management of conflicts of interest contained in the Regional Ethics Line Policy will be applied.

**Fourth: Solution.** The Ethics and Compliance Committee, acting as the employer's representative for these purposes, based on the analysis and investigation of the complaint received, after hearing the defenses and analyzing the evidence, will issue a decision by which it will determine the measures, sanctions or corrective measures to be implemented, if it deems it necessary. The Committee will have a maximum period of fifteen (15) working days from the presentation of the complaint to issue its decision, which will be understood to be suspended during the periods in which it is waiting for information from the complainant, in addition, it will observe the deadlines established in its regulations in the event that a request for reconsideration is filed.

The decision adopted will be communicated through the Ethics Line to the complainant (if known), to the person reported and to the Vice Presidency of Human Talent, from where the defined measures will be implemented. If the decision adopted corresponds to the imposition of any regulatory sanction, it will be imposed in accordance with the applicable legal procedures and observing the provisions of the Internal Work Regulations.

Without prejudice to the decisions that may be taken by the Committee under the regulations in force, these fall into the following categories:

- **Disciplinary:** the sanctions and measures established in the Internal Work Regulations **will be** applied.
- **Alternative:** only at the express request of the complainant, the recognition of the conduct by the person denounced and the establishment of reparation measures and guarantee of no repetition will be requested.
- **Legal:** if the conduct constitutes a crime according to the applicable regulations, SURA AM will guide the complainant through the provision of legal advice.

The Committee may also generate recommendations to carry out actions to improve the work environment, or the possible redistribution of roles that can improve relations between the parties.

In the event of false reports, the Company will take the appropriate measures against non-compliance with the obligation of truthfulness.

## **XI. GOVERNANCE, VALIDITY AND INCORPORATION INTO THE COMPANY'S REGULATIONS**

The approval of this Protocol is in charge of the Ethics and Compliance Committee and is effective as of its date of publication on the 25 day of october of 2024.

The Vice-Presidency of Human Talent is responsible for its dissemination by the means and mechanisms that are considered appropriate and that ensure its knowledge by the collaborators and other stakeholders to which it applies. It will also be responsible for updating it.

The provisions of this Protocol constitute legal obligations for all members of the Company, in accordance with the provisions of Law 1257 of 2008, Circular 026 of 2023 of the Ministry of Labor, in accordance with articles 57 and 58 of the Substantive Labor Code and the pronouncements of the Constitutional Court (Judgment T 400 of 2022). The Political Constitution of Colombia, Law 2365 of 2024 and the instruments of international law contained in the Declaration on the Elimination of Discrimination against Women, the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), the Declaration on the Elimination of Violence against Women, among other applicable norms.