

TRANSPARENCY AND BUSINESS ETHICS PROGRAM MANUAL SURA ASSET MANAGEMENT S.A.

1. INTRODUCTION

Corruption and transnational bribery constitute a serious threat to the integrity of the markets, trust in institutions and the development of society. Organizations, regardless of their size or sector, face the risk that their own employees, managers or internal processes may be involved in these criminal acts, either by direct action, omission or lack of adequate controls.

SURA Asset Management S.A. (hereinafter, "SURA AM" or the "Company"), is a commercial company domiciled in Medellín, Colombia, and identified with the TAX ID# 900.464.054-3. Its main corporate purpose is to invest in a portfolio of companies dedicated to asset management, pension fund administration and investment consulting.

In line with its ethical commitment and its zero-tolerance policy on corruption and transnational bribery, SURA AM has designed and implemented a Business Ethics and Transparency Program (*PTEE for its acronym in Spanish*), as part of its ethics and compliance system. This program responds to the guidelines of the SURA Business Group's Code of Conduct, the Anti-Fraud and Anti-Corruption Framework Policy and national and international regulatory requirements, including the Basic Legal Circular of the Superintendence of Companies.

Likewise, the PTEE is based on the corporate principles of respect, equity, transparency and responsibility, which guide the conduct of all employees and stakeholders of the organization, promoting an ethics and integrity culture in each process. The program is based on a risk analysis that assesses the Company's exposure to possible acts of corruption and transnational bribery.

2. OBJECTIVES

2.1. General objective

Establish the framework for action and guidelines that make up SURA AM's PTEE to prevent, detect, manage and mitigate the risks of corruption and transnational bribery that may arise

from its operations, commercial relations and corporate decisions, thus contributing to strengthening the ethical culture, business transparency and regulatory compliance.

2.2. Specific objectives

- a. Establish policies, guidelines and procedures for the effective management of corruption and transnational bribery risks, in accordance with the nature, structure and risk profile of the Company.
- b. Define the stages of identification, evaluation, control and monitoring of corruption and transnational bribery risks.
- c. Define the organizational structure and assign the roles and responsibilities to the administration, collaborators and control bodies in the application and supervision of the PTEE.
- d. Foster a culture of integrity and prevention against the risk of corruption and transnational bribery at all levels of the organization.
- e. Determine what documents are needed, how to store and report data so to have enough evidence on how to manage the PTEE before the internal control bodies and competent authorities.

3. SCOPE

All collaborators, managers and other stakeholders of SURA AM must comply with this Manual in what deems applicable to each one. Its scope covers all areas, processes, actions and transactions of the Company, with special emphasis on corruption and transnational bribery risks management

4. DEFINITIONS

The terms used in this document have the meaning that corresponds to each one according to its nature, the applicable regulation and the definitions purposely stated as follows:

- **End beneficiary:** A natural person who, as established in the applicable regulation, owns, controls or ultimately benefits from an entity, transaction or contractual relationship. The percentage of participation or control required to be considered an end beneficiary will be determined by the regulations in force.
- **Corruption:** all actions aimed at profiting the Company, seeking a benefit or interest, or being used as a means in any criminal action against the public administration or public property or any other acts of Transnational Bribery.
- **Due Diligence:** process carried out to obtain effective, efficient and timely knowledge of all counterparties, verifying legal, reputational and financial backgrounds.
- **Event:** Incident or situation where the risk of corruption or translational bribery occurs and takes place in the Company during a certain period of time
- **Risk Factors:** for the purposes of the PTEE, the following will be considered:
 - Jurisdictions: correspond to the countries where the Company has its legal domiciles and where its controlled companies are located.
 - Economic sector: corresponds to the main activity area in which the Company and its controlled companies participate.
 - Counterparties: are the third parties with which SURA AM interacts directly at the corporate level in the following categories: suppliers, employees, subordinate entities, shareholders, investors and members of the board of directors
 - Products and activities: taking into account that SURA AM does not offer any type of product or service, the grouping of these categories refers to SURA AM's own corporate activities as a holding company, which include the management of its investments, mergers and acquisitions (M&A) processes, financing and, in general, the execution of contracts and operations necessary for the development of its corporate purpose.
- **Corruption and Transnational Bribery Risk and Control Matrix:** an instrument that allows the identification, individualization, segmentation, evaluation and control of corruption and transnational bribery to which the Company could be exposed, according to the Risk Factors.
- **Corruption and Transnational Bribery Risk:** Possibility of losses, penalties or reputational damage that the Company could suffer by incurring, directly or indirectly, in acts of corruption or transnational bribery by action, omission or the lack of internal controls.
- **Transnational bribery:** is the act by which a legal person through one or more: (i) employees, (ii) contractors, (iii) administrators, or (iv) associates, own or of any subordinate legal entity give, offer, or promise, to a foreign public servant, directly

or indirectly: (i) sums of money, (ii) any object of pecuniary value or (iii) other benefit or profit, in exchange for the foreign public servant performing, omitting, or delaying, any act related to the exercise of his functions and in relation to an international business or transaction.

5. Internal regulatory framework associated with the Transparency and Business Ethics Program

SURA AM's PTEE is part of the ethics and compliance system, which is made up of a set of policies, processes, guidelines and stages articulated by the ethical management of the organization. In this sense, the main internal rules associated with the PTEE are:

- a. Code of Conduct of the SURA Group of Companies
- b. Anti-Fraud and Anti-Corruption Framework Policy
- c. Transparency and Business Ethics Program Manual
- d. Regional Compliance Policy
- e. Regional Gifts and Hospitality Policy
- f. Regional Personal Investment Policy
- g. Regional Ethics Line Policy
- h. Single Conflicts of Interest Policy
- i. Ethics and Compliance Committee Rules

6. General policies for managing corruption and transnational bribery risks

SURA AM, within the framework of its commitment to business ethics, transparency and regulatory compliance, adopts the following general policies as a guiding principle in the management of corruption and transnational bribery risks.

- a. SURA AM has adopted a zero-tolerance policy towards any practice of corruption and transnational bribery, in line with its corporate principles and the Colombian and international legal system.
- b. SURA AM's employees, administrators and counterparties must carry out their activities in compliance with the rules and procedures for the prevention of the risks of corruption and transnational bribery, as well as compliance with corporate principles, in accordance with the provisions of the Code of Conduct.

- c. The Company will put first the policies adopted for the correct management of any corruption and transnational bribery risk before the fulfillment of its goals or the execution of the business objectives.
- d. It is the obligation of all employees and administrators to know the objectives, policies and procedures related to the prevention of corruption and transnational bribery risks.
- e. Any action that infringes the policies and procedures contained in the PTEE and that exposes the Company to the risks of corruption and transnational bribery will constitute a misconduct that will be investigated and may have consequences as defined in the applicable norms and internal regulations of SURA AM.
- f. The management of corruption and transnational bribery risks will be carried out based on the risk methodologies defined by the Company, for which the Business Risks area will provide the necessary support in the identification, evaluation, control and monitoring of such risks.

7. Policies related to the stages of the PTEE

7.1. Identification

The Company identifies the inherent risks of corruption and transnational bribery considering its corporate purpose and business model as a holding company. This process is based on the analysis of the defined risk factors.

Identification is carried out through expert judgment, analysis of the internal and external context, and study of typologies in accordance with the international organizations. Includes the segmentation of the counterparties and jurisdictions to establish differentiated levels of exposure. The identified risks are recorded in the Corruption and Transnational Bribery Risk Matrix.

7.2. Measurement

The Company applies methodologies to assess the probability of occurrence and the impact of corruption and transnational bribery risks, both in their inherent and residual state. The measurement is carried out through a risk management matrix, documenting risks, causes, impacts and applicable controls.

7.3. Control

The Company establishes control measures to mitigate the identified risks, reducing their probability of occurrence and/or impact. Controls must be documented, operational and have verifiable evidence. The Company must guarantee technical, human and financial resources for the proper application of controls and improvement of the system.

7.4. Monitoring

The Company implements mechanisms to permanently monitor the behavior and evolution of the inherent and residual risk of corruption and transnational bribery. Monitoring allows detecting emerging events and evaluating the effectiveness of the controls in place.

8. Guidelines by risk factor

8.1. Jurisdictions

The Company assesses the risk of corruption and transnational bribery associated with the jurisdictions in which it has a presence or conducts its operations, considering the international indices of perception of corruption, as well as geopolitical, regulatory and international cooperation factors.

Main controls:

- Application of international indices of perception of corruption and country risk.
- Segmentation of jurisdictions by level of risk (low, medium, high).
- Operation restriction or prohibition of in non-cooperation jurisdictions or with a high risk of corruption.
- Regular monitoring of regulatory changes, international sanctions, and relevant geopolitical events.

8.2. Economic Sector

The Company recognizes that the financial sector, due to its nature, complexity and international scope, may be exposed to risks of corruption and transnational bribery, especially in activities such as investment management, financial intermediation, management of third-party funds and relations with regulatory authorities. However, this

sector is also characterized by high regulatory standards, supervision and control, which contributes significantly to the mitigation of these risks.

In this context, SURA AM, through its affiliated companies and subsidiaries, participates in an environment that requires compliance with strict local and international regulatory frameworks, which implies constant adaptation to good practices, regulatory requirements and ethical standards. For this reason, the Company carries out a continuous assessment of the sector, identifying specific vulnerabilities and applying differentiated controls that reinforce the prevention and detection of any misconduct.

Main controls:

- Monitoring of international organizations (OECD, FATF, Transparency International) alerts and reports on corruption risks in the financial sector.
- Referencing of anti-corruption policies aligned with international standards (FCPA, UK Bribery Act).
- Periodic training in corruption prevention and transnational bribery for collaborators in sensitive areas.
- Risk assessment in new financial products, services and investment structures, considering their exposure to corrupt practices.
- Revision of the relationship with authorities, regulators and third parties that may represent risks of influence peddling or improper payments.

8.3. Counterparties

The Company has assessment, monitoring and identification mechanisms of the counterparties it has commercial or strategic relationships with, including shareholders, investors, suppliers, employees and controlled entities. They are segmented by type and risk level, and due controls are applied according to their exposure

Main controls:

- Initial and regular due diligence, with a focus on a background of corruption or sanctions for transnational bribery.
- Segmentation of counterparties by type and level of risk.
- Consult restrictive, punitive and binding lists (OFAC, UN, EU) at least once a year.
- Inclusion of anti-corruption clauses in contracts, including early termination for non-compliance.

8.4. Products & Activities

The Company assesses the risk of corruption and transnational bribery in its corporate activities, such as investments, mergers and acquisitions, financing, capital management and contract execution.

Main controls:

- Revision of operations by corporate governance bodies with a focus on integrity and transparency.
- Complete document traceability of strategic operations.
- Identification and verification of end beneficiaries in investment and acquisition operations.
- Assessment of reputational and legal risks before closing deals.

9. Communication Channels

The Ethics Hotline, available at <https://suraam.sistemaetico.com/>, is the main channel enabled by SURA AM to report irregular, unethical or illegal conduct, including possible acts of corruption or transnational bribery. This channel guarantees conditions of confidentiality, anonymity and security to protect the information and identity of the person, in case he or she decides to disclose it. In addition, due process is ensured in managing the reports with respect and non-retaliation against those who act in good faith.

In addition to the Ethics Hotline, SURA AM has the following external channels also available for filing a report:

- Direct contact with the Compliance Officer or his/her deputy
- Transnational Bribery Complaints Channel – Superintendence of Companies:
https://www.supersociedades.gov.co/delegatura_aec/Paginas/Canal-deDenuncias-Soborno-Internacional.aspx
- Channel for Complaints of Acts of Corruption – Secretariat of Transparency of the Presidency of the Republic:
<https://www.secretariatransparencia.gov.co/observatorio-anticorrupcion/portal-anticorrupcion>

10. Organizational Structure

10.1. Board of Directors

The responsibilities of the Board of Directors of SURA AM are:

- a. Appoint the Compliance Officer and define his/her profile.
- b. Approve the Business Transparency and Ethics Program.
- c. Undertake the commitment in the prevention of Corruption and Transnational Bribery Risks, so that the Company can conduct its business in an ethical, transparent and honest manner.
- d. Ensure the supply of the economic, human and technological resources required by the Compliance Officer for the fulfillment of the task.
- e. Order the pertinent actions against the Company's perpetrators regardless of their position, rank or relationship with the Company, when they fail to comply with the provisions of the Program.
- f. Lead an appropriate communication and training strategy to ensure the effective outreach and knowledge of the Compliance Policies and the PTEE to Employees, Shareholders, Suppliers and other interested parties.
- g. Through the Sustainability and Corporate Governance Committee, monitor the indicators by which the performance of the Program is evaluated, monitoring its implementation and execution through the reports to the Company's Ethics Line.

10.2 Legal representative

The responsibilities of the legal representative in relation to the PTEE are:

- a. Submit the PTEE's proposal to the Compliance Officer for Board of Directors approval.
- b. Ensure that the PTEE is articulated with the Compliance Policies adopted by the Board of Directors.
- c. Provide effective, efficient and timely support to the Compliance Officer in the design, direction, supervision, and monitoring of the PTEE.
- d. Ensure that the activities resulting from the development of the PTEE are duly documented.

10.3 Ethics Committee

This is the body in SURA AM oversee the decision making related to the behaviors that do not comply with the ethical framework. These are the responsibilities regarding the PTEE:

- a. Act as the highest authority for resolving situations in which felons have engaged in conduct contrary to the Company's transparent and ethical business development.
- b. Act as a consultative body to resolve queries about the ethical behavior of Employees or Senior Management, for which they will have the support of the Legal and Compliance area.
- c. Monitor the implementation and compliance of the Program in the Company.
- d. Monitor the results obtained from the evaluation of the anti-corruption and transnational bribery controls contemplated in this Program.
- e. Know and resolve the reports of corruption and transnational bribery through the channels that the Company has in place, for which they will have the support of the Compliance area.
- f. Propose recommendations for the strengthening of the PTEE.
- g. In investigations involving a member of the Board of Directors, Chairman, Vice Presidents or the Company's Auditor, the Sustainability and Corporate Governance Committee shall be the Ethics Committee.

10.4 Compliance Officer

10.4.1. Profile:

The Compliance Officer, principal or alternate, of SURA AM must meet the following profile and requirements:

- Comprehensive knowledge of the organization: Must understand the structure, operation and main activities of the Company, as well as the relevant aspects that may impact the corruption and transnational bribery risk management.
- Education and experience: Must have an educational background and experience in risk management, regulatory compliance, business ethics or financial crime prevention.
- Analytical capacity and technical criteria: To identify warning signs, assess risks, define controls and make informed decisions.
- Functional independence: Cannot simultaneously hold administrative positions nor serve as a statutory auditor or internal auditor.
- Direct communication with senior management: Has access to the Board of Directors to report findings, present reports and propose corrective actions.

- **Autonomy to define controls:** Has the ability to outline the criteria, review processes and approve sensitive transactions, considering factors such as the type of operation, the level of risk, and the applicable internal and external provisions.
- **Access to adequate resources:** Must have the human, technical, and operational resources necessary to fulfill the tasks.
- **Registration with the UIAF:** Must be registered in the online reporting system (*SIREL for its acronym in Spanish*) as an authorized user to make any suspicious operation reports (*ROS for its acronym in Spanish*) and other regulatory requirements.
- The rest defined in the applicable regulation.

10.4.2. Functions:

The Compliance Officer has the following duties:

- a. Ensure effective, efficient and timely compliance with the PTEE.
- b. Define, adopt and monitor actions and tools for the detection of corruption and transnational bribery risks.
- c. Ensure the implementation of appropriate channels to report potential non-compliance to the PTEE.
- d. Verify the proper application of the policies for the protection of whistleblowers and prevention of workplace harassment, derived from the use of reporting channels.
- e. Coordinate the development of training programs.
- f. Ensure the proper filing of the documents and information related to the PTEE.
- g. Together with the legal representative, submit the PTEE proposal for approval by the Board of Directors.
- h. Present, at least once a year, a report to the Sustainability and Corporate Governance Committee containing an evaluation and analysis of the efficiency and effectiveness of the PTEE and, if applicable, suggest the respective improvements.
- i. Develop all the documents of the Program, the requirements defined in its design, including the management of non-conformities, investigations, and reporting channels.
- j. Ensure that the PTEE is articulated with the Compliance Policies adopted by the Company.
- k. Implement a Risk Matrix and review any updates according to the Company's own needs, Risk Factors and the risk of corruption and transnational bribery in accordance with current regulations.
- l. Have internal investigation procedures in the Company to detect breaches of the PTEE.
- m. Verify compliance with the Due Diligence procedures applicable to the Company.

- n. Design the methodologies for classification, identification, measurement and control of the Corruption and Transnational Bribery Risk that will be part of the PTEE based on the risks to which the Company is exposed to.
- o. Together with the Compliance area, make the respective updates of the Program in accordance with the applicable regulations or a revision at least every (2) two years.

10.5 Collaborators

In relation to the PTEE, the collaborators are responsible for:

- a. Immediately report suspicious acts or activities in matters of corruption or transnational bribery of which they are aware in any form through the channels established in the PTEE or to the Compliance Officer.
- b. Participate and pass the training courses carried out on the subject matter and clear any doubts that may arise from the Program.
- c. Report the noncompliance with the controls designed for prevention or detection indicated in the Program. Specific controls may be assigned in matters of Corruption and Transnational Bribery according to the roles and functions in the Company, with which he or she must comply with in full.

10.6.1 Internal Audit Unit.

The Corporate Audit Unit is responsible for assessing that the key controls for corruption and transnational bribery risks prevention remain in force and are effective, especially in the management of high and medium risks identified in the PTEE. In addition, it can evaluate the performance of the areas in charge of executing these controls, verifying the sound implementation and operation.

These controls must be subjected to regular tests by the Corporate Audit area favoring the detection of breaches and other errors in the control processes.

10.7 Statutory Auditor

The Statutory Auditor is responsible for verifying compliance with the Company's legal, statutory and regulatory obligations, as well as for supervising the integrity of the financial and accounting information. Must ensure that the organization's operations are carried out in accordance with the current regulations and report any relevant situation to the administrative bodies and, where appropriate, to the competent authorities.

11. Prevention of Corruption and Transnational Bribery

The risk of corruption and transnational bribery cannot be completely eliminated, as it responds to external factors and individual intentions that are difficult to control. However, SURA AM implements a set of activities that strengthen institutional integrity and discourage improper conduct, through prevention, detection, deterrence, and response mechanisms.

These activities are part of the PTEE and are complemented by other instruments defined by the Company, such as the risk and controls matrix, without constituting an exhaustive list.

11.1 Staff Selection and Contracting

SURA AM applies rigorous criteria in the selection and hiring processes of employees and third-party service providers, ensuring that they comply with ethical and legal standards. This measure seeks to prevent onboarding people who may represent risks of corruption or bribery, especially in sensitive or decision-making positions.

11.2 Knowledge of Counterparties

Although SURA AM does not have direct clients, it conducts due diligence processes on its strategic counterparties (suppliers, investors, controlled entities, etc.), to identify red flags, negative background or links to corrupt practices. This control is key to preventing transnational bribery in corporate relations.

11.3 Training and Awareness

Regular training programs are developed for employees, focused on the identification, prevention and reporting of risks of corruption and transnational bribery. These trainings strengthen the ethical culture and knowledge about the applicable regulatory framework.

11.4 Signing of Ethical Commitments

In the hiring process, both employees and suppliers must sign commitments to comply with the Code of Conduct, internal policies and the Transparency and Business Ethics Program. This formal affirmation reinforces individual responsibility in the face of corruption risks.

11.5 Conflict of Interest Management

SURA AM has procedures in place to identify, declare and manage possible conflicts of interest, in accordance with the Code of Good Corporate Governance and the Code of Conduct. This practice seeks to avoid decisions influenced by personal or external interests.

11.6 Segregation of Duties

Separation of responsibilities is implemented in key processes, especially those related to financial, contractual or supervisory decisions. This measure reduces the risk of a single person having full control over a process susceptible to corrupt acts.

11.7 Authorization Levels

The relevant decisions are submitted for levels of approval according to the responsibility and hierarchy of each role. This structure allows for effective control over operations that may involve risks of corruption or bribery.

11.8 Reconciliations and Transaction Review

Regular adjustments and documents reviews are carried out on strategic operations, to detect inconsistencies, validate traceability and reinforce transparency. These activities are complemented by cross-checks and continuous monitoring.

11.9 Warning Signs

It is essential to have mechanisms in place to identify any warning signs of possible irregularities. These warning signs, also known as risk indicators or red flags, are clues that suggest the need for a more in-depth review of a specific operation, relationship, or behavior.

The early detection of these signs allows for preventive and corrective controls to be activated, strengthening the Company's response capacity. In line with the provisions of the applicable regulation, some relevant red flags include:

- Transactions with counterparties located in high-risk or non-cooperative jurisdictions.
- Unjustified or disproportionate payments to third parties without a clear return.
- Intervention of intermediaries without valid commercial justification.

- Relationship with public officials or Politically Exposed Persons (PEPs) without adequate controls.
- Incomplete, inconsistent or altered documentation in contractual or financial processes.
- Refusal or resistance to provide information required in due diligence processes.
- Pressure to speed up decisions without following established procedures.

These warning signs must be continuously monitored and documented in risk management processes, as part of the self-control and supervision mechanisms defined in the PTEE. The timely identification of these alerts helps to prevent a corrupt conduct and to protect the integrity of the Company.

11.10 Lessons learned

Any investigation that results in the confirmation of an act of corruption or transnational bribery, regardless of its magnitude, must be documented by the Compliance Officer in coordination with the Legal and Compliance areas. This allows for the identification of control failures, the application of corrective measures and strengthening the prevention process. Lessons learned should be shared with relevant staff to increase awareness, improve controls, and facilitate the identification of red flags.

11.11 Links with Politically Exposed Persons

SURA AM establishes reasonable restrictions for the employment or contractual relationship of former public officials, especially when their previous functions are directly related to activities that may generate conflicts of interest or risks of influence peddling. This control seeks to avoid situations that could lead to acts of corruption or bribery.

In cases where a counterparty is classified as a Politically Exposed Person (PEP), this will be subject to evaluation and will solely be approved by the Compliance Officer, who must consider the level of exposure to risk, the applicable controls and the traceability of the due diligence process.

11.12 Charitable Contributions

Donations and sponsorships made by the Company must be transparent, properly documented, and comply with applicable regulations. The use of these mechanisms as a means of covering up improper payments or influencing decisions of third parties, especially public officials or politically exposed persons, is prohibited.

The Compliance Officer may establish specific controls for the review or approval of these operations, considering criteria such as the amount, the nature of the beneficiary, the type of relationship or any other factor that represents a relevant exposure to the risk of corruption or transnational bribery.

11.13 Facilitation Payments

SURA AM prohibits facilitation payments, understood as unofficial disbursements made to expedite procedures or services to which it is entitled. These payments, although small, constitute a form of bribery and represent a significant risk in international operations. Its detection can be associated with red flags such as payments without commercial justification or unnecessary intermediaries.

11.14 Political contributions

The Company, its collaborators and related third parties must refrain from making contributions to political parties, candidates or persons linked to political activities as a means of obtaining undue advantages. Any political contribution must be transparent, authorized, and comply with the applicable law.

Any political contribution must be transparent, duly authorized and comply with the current legislation. The Compliance Officer may establish specific controls for the review or approval of this type of operation, considering criteria such as the amount, the type of beneficiary, the context of the contribution or any other factor that represents a relevant exposure to the risk of corruption or transnational bribery.

11.15 Gifts & Entertainment Policy

SURA AM has a clear policy on the reception and offering of gifts, hospitality or entertainment. Employees should refrain from engaging in practices that could be interpreted as attempts to influence decisions or generate undue commitments, especially in international contexts or with public officials.

11.16 Incident Investigation

In the event of the suspicion or a clear act of corruption or bribery, the Compliance Officer will lead the investigation. The investigation must be objective, documented and respect the due process, guaranteeing the traceability of the actions and the protection of the information.

11.17 Due diligence

Due diligence is the process by which SURA AM obtains effective, timely and sufficient knowledge of its counterparties to prevent risks associated with corruption and transnational bribery. This includes the regular revision of the legal, financial or reputational aspects, as well as validation in restrictive lists and public sources that allow for the identification of relevant warning signs.

The responsible areas, such as Procurement, Legal, Compliance, Human Talent, among others, develop this process in a coordinated manner, ensuring document traceability and homogeneous evaluation criteria.

Internal controls include:

- Searches in sensitive lists and legal, disciplinary, reputational and commercial background checks, applicable to both natural and legal persons, in supplier or staff selection.
- Bribery-related controls, such as segregation of duties and authorization levels, to avoid conflicts of interest and ensure the proper justification of payments and commercial agreements, through the participation of multiple areas in high-impact decisions.
- Follow-up of internal investigations related to possible acts of corruption or transnational bribery, whose progress and findings are documented in compliance reports and presented to the corresponding committees.

These mechanisms allow SURA AM to anticipate any risk situations, strengthen transparency in its corporate relations and comply with the ethical standards defined in the PTEE.

12. Duties of Suppliers

To strengthen the integrity in the business relations and prevent any risks associated with corruption and transnational bribery, suppliers that have contractual ties with SURA AM must comply with the following:

- 12.1. Act in accordance with the applicable legislation on the fight against corruption and bribery, as well as respect the ethical principles defined in the SURA AM Supplier Code of Conduct.
- 12.2. Provide truthful, complete and updated information during the processes of selection, contracting and during the service provided, including legal, financial and reputational background.
- 12.3. Declare any situation that may represent a real or potential conflict of interest within the scope of the business relationship with SURA AM.
- 12.4. Refrain from offering, promising, authorizing, or delivering any type of undue benefit to public officials, Politically Exposed Persons (PEPs), or third parties, to obtain commercial or contractual advantages.
- 12.5. Actively cooperate with SURA AM in the event of internal investigations related to possible acts of corruption or bribery, providing the required information and documentation.
- 12.6. Ensure that the resources provided by SURA AM, including payments, donations or sponsorships, are used exclusively for the agreed purposes, avoiding their diversion or improper use.
- 12.7. Sign the documents that formalize the compliance with the principles of the PTEE, including the acknowledgment of the Code of Conduct and the Company's anti-corruption policies.
- 12.8. Attend the training or awareness-raising sessions convened by SURA AM on business ethics, compliance and corruption prevention.
- 12.9. Use the channels provided by SURA AM, such as the Ethics Hotline, to report any irregular conduct, suspicion of corruption or non-compliance with ethical principles.
- 12.10. Implement its own control, supervision and monitoring mechanisms that contribute to the prevention of corrupt practices within the scope of the contractual relationship with SURA AM.

13. Storage and Access to the Documents

The documents containing the result of the controls implemented for the prevention and management of risks of corruption and transnational bribery must be kept for a minimum period of five (5) years, guaranteeing conditions of security and integrity.

Access to these documents by collaborators or control entities will be made upon request to the Compliance Officer, who may authorize the consultation in accordance with criteria of traceability, confidentiality and relevance. Likewise, the Compliance Officer may define additional controls on the storage, classification and access to this documentation, depending on the level of sensitivity, the type of operation or the associated risk.

14. Disciplinary Actions

Failure to comply with the guidelines established in the PTEE, especially those related to the prevention and management of corruption and transnational bribery risks, may lead to disciplinary actions by SURA AM. These actions will be according to the provisions of the Internal Work Regulations in regard to misdemeanors, sanctions and disciplinary procedures, and will be subject to the legal provisions in force. The applicable measures will depend on the seriousness of the case and may include anything from warnings to the termination of the employment or contractual relationship, without prejudice to the corresponding legal actions.

Version	Date of update	Description of changes	Responsible area
1.0	11/09/2022	Initial version	Legal & Compliance, risks
2.0	11/05/2025	Regulatory adjustments and Internal audit update	Compliance