

**CODE OF GOOD CORPORATE GOVERNANCE**  
**ATTACHMENT FOR SURA ASSET MANAGEMENT S.A.**

**A. SCOPE AND AREA OF APPLICATION:**

This attachment to the code of good corporate governance for Grupo Sura (the “Code”), includes the special provisions applicable to Sura Asset Management S.A.

In all other matters, Sura Asset Management shall abide by the provisions of Grupo Sura’s code of good corporate governance.

1. The affiliates and subsidiaries of Sura Asset Management shall carry out all procedures necessary for adopting and incorporating both Grupo Sura’s code of good corporate governance and this specific Annex applies to Sura Asset Management S.A.

**B. PUBLICATION:**

Sura Asset Management’s senior management will be responsible for informing the stakeholders about the existence and contents of the code and this attachment. To that effect, the text of the code and its attachment will be available at the Secretary-General and may be consulted in the company’s webpage.

**C. CORPORATE FRAME OF REFERENCE**

The corporate mission, vision, and principles guide the activities, goals, behaviors, and conducts of Sura Asset Management S.A.’s directors and employees:

**MISSION**

*we help our clients fulfill their dreams and reach their goals through integrated assistance, and savings, protection, and investment throughout their lifecycle, ensuring value creation and sustainable growth*

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**VISION:**

SURA Asset Management the leading company in savings in Latin America. We shall be the best, recognized and preferred company in each of our markets

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**D. CODE OF CONDUCT**

Sura Asset Management has adopted the code of conduct for the Sura business group as well as a specific one for Sura Asset Management, which is integrated into the former as an attachment. These documents are independent from this code, and their purpose is to provide practical guidelines for the practical management of the companies, and to provide norms of behavior that foster the development of trust relationships with the stakeholders. The code of conduct complements the provisions found in the code of good governance and can be found in the company's webpage.

#### **E. SPECIAL AUDITS BY SHAREHOLDERS AND INVESTORS**

Sura Asset Management's bylaws establish, in article 24, the right of the shareholders to request specialized audits.

#### **F. GENERAL SHAREHOLDERS ASSEMBLY**

SURA Asset Management's Assembly has a set of rules approved by the shareholders assembly itself.

#### **G. INTERNAL RULES OF THE BOARD OF DIRECTORS**

SURA Asset Management's has a set of rules approved by the shareholders assembly.

#### **H. GENERAL POLICY FOR THE APPOINTMENT, COMPENSATION, AND SUCCESSION OF THE BOARD OF DIRECTORS,**

SURA Asset Management's Board of Directors has a general policy for the appointment, compensation, and succession of the Board of Directors, which is approved by the shareholders assembly.

#### **I. LIMITATIONS AND CONFLICTS OF INTEREST OF THE DIRECTORS**

the corporate governance committee or the ethics committee, as appropriate, shall evaluate the participation in boards of directors of those members who might have some conflict of interest, such as being related to suppliers, competitors, or clients of any of the companies that produce revenue exceeding twenty per cent (20%) of the revenues of any of those companies, being a counterpart in any litigation against the companies,

or being in a position to obtain significant benefits from a decision made by one of those boards of directors.

For this purpose, SURA Asset Management shall have a policy to know about, manage, and solve any conflict of interest that might affect the members of the Board of Directors and other corporate administrators, whether directly or indirectly through their related parties.

#### **J. RESPONSIBILITIES OF THE LEGAL REPRESENTATIVE, PRESIDENT, AND VICE PRESIDENT**

The President of SURA Asset Management shall have all the duties assigned to the legal representative in the company bylaws. This document is available to the public in each company's webpage.

#### **K. DISPUTES BETWEEN EMPLOYEES WERE NOT ADMINISTRATORS, DIRECTORS, OR MEMBERS OF SENIOR MANAGEMENT**

Whenever an employee or officer of the company's, other than an administrator or member of senior management or of the Board of Directors, faces a conflict in performing his or her duties within the companies, he or she shall report the situation, immediately and in writing, to a hierarchical superior, who will bring the matter to the ethics client at each company to obtain a solution.

If the committee believes that the situation of possible conflict should be known to the Board of Directors, the committee shall scale the issue for the board to make the appropriate decision. In that case, the decision may be delegated by the Board of Directors on the company's corporate governance committee.

#### **L. CONFLICTS BETWEEN THE COMPANY AND ITS EMPLOYEES**

any conflicts that arise between the companies in their employees shall be resolved according to the provisions of each corporation's internal work rules, the law, and the work contract. In addition, the company shall apply the disciplinary procedures established by any applicable labor regulations.

## **M. CRITERIA TO SELECT SUPPLIERS OF GOODS AND SERVICES**

SURA Asset Management's Board of Directors has a policy for integral supplier management which regulates this topic and is approved by the Board of Directors.

## **N. PUBLICATION**

Each company's senior management will be responsible for informing the market and the stakeholders about the existence and contents of this code.

Furthermore, the text of the code in this attachment is available at the Secretary-General's of the companies and in their web pages.