

POLICY TO ENHANCE DEMOCRACY AND MECHANISMS OF CITIZENS' PARTICIPATION

Fundación SURA (hereinafter, the “Foundation”) acknowledges the importance of exercising a citizenship that promotes democratic systems and the active participation of different players in society, including the corporate sector. Hence, to develop its commitment to corporate responsibility, the Foundation prepared this policy intended to establish mandatory guidelines to make contributions to different political parties, political movements and significant groups of citizens legally incorporated and approved by regulatory authorities in each country (hereinafter, the “Beneficiaries”).

Scope and Frame:

This Policy applies to the Foundation, its employees, members of the Board of Directors and its main benefactors.

Guidelines:

- Abide to the constitutional, legal and institutional provisions in force to finance election campaigns and other mechanisms of citizens' participation, complying with the limits established for this matter.
- Make donations to political parties, political movements and significant groups of citizens with legal capacity acknowledged by the regulatory authorities of each country.
- Contributions made shall not be made under any constraints in favor of the interests of the Foundation or its benefactors, or decisions or actions made by the political organization.
- If a personal contribution is made by any employees, Board members, Senior Management or Benefactors of the Foundation to campaigns or political movements which have received resources from the Foundation, said contribution should be informed in advance to the Foundation; the Board of Directors shall analyze the presence of any conflict of interest.
- Contributions made by the Foundation shall be documented.
- Before formalizing the contribution, Beneficiaries shall issue a certificate evidencing that all of the money received

shall be exclusively used to further democratic purposes.

- Beneficiaries shall commit to be publicly accountable for the amount, origin and destination of its income. Consequently, the Foundation shall demand that the documents that formalize the contribution should expressly include said commitment. In addition, the Beneficiary shall present a report on how the contribution received was managed, certified by its accountant, auditor or external auditor.
- In the event that any of the Beneficiaries is sanctioned for the breach of the principles established in the Colombian Constitution, any contribution underway shall be immediately suspended, and contributions for the following election campaigns in which the Beneficiaries participate shall be interrupted.
- Beneficiaries shall certify that they are aware of this Policy and manifest their commitment to oversee its compliance.
- Contributions made by the Foundation shall be impartial and neutral.
- Beneficiaries are not allowed to use the name or image of the Foundation or of its benefactors for advertising purposes, as a result of the different contributions made.
- The Foundation shall publicly inform, on the institutional media available for this purpose, the total amount given to enhance democracy and mechanisms of citizens' participation.

Governance:

The Board of Directors of the Foundation shall be the body in charge of Governance in this policy, and shall oversee its compliance and update.

Disclosure:

This policy shall be disclosed on the Foundation's website and of public knowledge.