

## Human Rights Policy

### SURA Asset Management

SURA Asset Management (hereinafter: SURA AM or the Company) under its Commitment to Human Rights and compliance with the governing standards such as the Universal Declaration of Human Rights, the UN Global Compact, the International Labor Standards and other global guidelines, has defined this Policy as a guide to the company's actions in terms of respect and protection of Human Rights for its clients, employees and other stakeholders, thus confirming its position and support to the Company and its subsidiaries.

With this policy, we stand committed with the people's social security as the core of the products and services we offer. Our actions are not only ethical but in accordance with the guidelines and impacts identified in the field of human rights and its relationship with our stakeholders.

#### 1. Policy development

Key areas participated in the implementation of this policy to meet the sustainability strategy of the Company and its subsidiaries in the countries where we operate. These areas are specialized in Sustainability, Human Talent, Risks, Clients, Legal and Compliance, Sustainable Finance, among others and have extensive knowledge of the company's interactions with different stakeholders.

#### 2. Provisions for the respect of the Human Rights of the employees

Our actions are governed by the conviction of respecting the international labor standards issued by the International Labor Organization (ILO), as well as the relevant laws and internal regulations in the countries where SURA AM has a presence as a sign of our responsibility and commitment to maintaining inclusive, equitable and respectful workplaces:

**2.1 Discrimination and unequal treatment.** We reject all forms of discrimination and unequal treatment in the workplace on the grounds of race, color, sex, language, religion, nationality, political opinion, social origin, economic or social status or any other condition such as disability, age, marital status, pregnancy, family status, sexual orientation and gender identity, health status and/or place of residence.

**2.2 Sexual and non-sexual harassment.** We reject all types of sexual and/or non-sexual harassment in the workplace on the grounds of race, color, sex, language, religion,

nationality, political opinion, social origin, economic or social position or any other condition, such as disability, age, marital status, pregnancy status, family situation, sexual orientation and gender identity, health status and/or place of residence.

**2.3 Equity of remuneration.** We guarantee equality in the payment of wages to employees for work of equal value, without distinction to gender, sexual orientation, race, color, religion, nationality, political opinion, social origin or any other status, such as disability, age, marital status, pregnancy status, family situation, state of health, and/or place of residence.

**2.4 Forced labor.** The company does not coerce or intimidate any employee, nor does it use manipulation, withholding of identity documents or threats to report to immigration authorities to retain its employees. All of them freely accept the fulfillment of their job in a contract signed between them and the company, in compliance with the legal parameters.

**2.5 Working conditions.** We offer decent working conditions to our employees, respecting their work schedules, breaks, vacations, balance among their family and personal life, as well as the appropriate physical conditions in the workplace so they can fulfill their job including easy access for those who have some type of disability, among others, with the due respect for the people and their Human Rights.

**2.6 Child labor.** We do not accept child labor that deprives them for fully living their childhood, that hinders their schooling, physical and mental development.

**2.7 Trafficking in Persons.** We reject the recruitment, transportation, transfer, harboring or receipt of persons by threats, force or other forms of coercion, abduction, fraud, or deception for the purpose of exploitation.

**2.8 Freedom of association and the right to collective bargaining.** We respect the right of our employees to form the organizations they consider and their decision to be part of them. Likewise, the Company openly welcomes voluntarily organized employees who consider it necessary to freely discuss and negotiate aspects of their relationship and their working conditions, governed by legal parameters of collective labor law in the countries where it operates.

**2.9 Health and security.** We have mechanisms in place to protect the health of our employees and their families, as well as access to social security in compliance with the regulations in each country and their requirements, such as affiliations, payments of the social benefits that correspond to the company, or any other additional individual or family plans they personally want to acquire as additional protection.

**2.10 Freedom of expression, religion and beliefs.** We do not tolerate intimidation or threats that seek to diminish the peaceful expression of opinions,

concepts or disagreement regarding the company's activities, as well as religious views and individual beliefs. We have several channels to manage requests, complaints and claims in the case an employee considers that something goes against the respect and protection of their Human Rights, such as the Ethics Line and a Contact portal available on our website.

These principles are developed and updated throughout our internal regulations.

### **3. Additional provisions**

Our reason for being in SURA AM is to accompany our clients in their savings and retirement stages that allow them to build their equity and their future. We understand that the right to having social security is fundamental to ensure the human dignity of the people. This is highly relevant for us, because with protection and respect we guarantee the necessary coverage of those who are facing situations of vulnerability, such as disability, old age or death. We also offer guidance for establishing a savings fund that provides support to reach their goals and aspirations, as an enabler to exercise their right to an adequate standard of living.

In our operation we have human rights strategies and mechanisms that permeate our services and products, which are oriented to satisfying the needs of our clients. Our commitment is to ensure that, in addition to complying with the set of relevant regulations, we act ethically and with transparency, offering optimal solutions to meet their needs and prioritizing the protection of their rights as individuals. To meet this objective, we implement due diligence measures that allow us to prevent possible breaches throughout the value chain and of our portfolio of products in direct investments.

Moreover, this should not be exclusive to SURA AM, on the contrary, we encourage our suppliers as stakeholders to voluntarily give continuity to the protectionist approach to everything related to human rights and the management of the risks that may arise. In the medium term, the Company will advance in the effort to guarantee this permanent protectionist approach for all our stakeholders.

#### **Scope**

This policy applies to SURA Asset Management S.A. and our affiliated companies, which must adhere to these guidelines at all stages of their operations, ensuring that the promotion of respect and the preservation of human rights is aligned with what is being stated. Likewise, this policy guides our interactions with shareholders, employees,

suppliers, contractors, other stakeholders and all of those who maintain a relationship with the company.

## **Governance**

The Board of Directors of SURA AM, through the Sustainability and Corporate Governance Committee, is responsible for approving the content of this policy, its updates, as well as the continuous revision of its compliance. This policy will be kept available to all stakeholders on the website of the company and the affiliated companies.

## **Related Internal Regulations**

Codes, policies, processes, and others that contain statements and controls related to the rights listed here.

- Code of Conduct
- Selection Policy
- Supplier Code of Conduct
- Internal Work Regulations
- Diversity, Equity, and Inclusion Policies (DEI)

## **Annexes:**

The following documents are an integral part of this Human Rights Policy; therefore, it is governed by all the guidelines prescribed here, its scope and governance.

- **Human Rights Risk Framework and Due Diligence Process**

It's required to identify, prevent, mitigate, and account for how to address the actual and potential adverse impacts as an integral part of business decision-making and risk management systems. Risk identification must be done in own operations, in the value chain or other activities related to the business and the risks in new business relationships (mergers, acquisitions, joint ventures, etc.). A systematic periodic review of the risk map of potential problems must also be done.

According to the DJSI, at least the following groups that are at risk of receiving impacts on their UDHR must be included in the due diligence: own employees, women, children, indigenous people, migrant workers, third parties' employees, local communities and others according to the company's stakeholders.