Risk Culture in Grupo Aval

Grupo Aval is convinced that proper risk management leads to positive outcomes and the stability of the entities that comprise it. Therefore, it maintains a risk management strategy aimed at ensuring that every employee, both within the Financial Holding and its subsidiary entities, understands their role in this process.

As part of strengthening our risk culture, we foster











faced by the Financial Holding and its various entities in their business development.

Grupo Aval employs a comprehensive risk management model that includes governance elements such as



Committees at various levels (Board of Directors, senior





of corporate policies



instructions

designed to guide the management of different risk types:















and the adoption of mechanisms to monitor the various risk levels faced by the Financial Holding and its subsidiaries.

In line with this, in 2023

Grupo Aval Holding's Risk team conducted risk training sessions, achieving



through the new hire onboarding program, annual refresher training, and knowledge assessments for existing employees.

Below, we detail the risk systems, the number of employees trained, and the frequency with which the messages are reinforced:

Anti-Bribery and Anti-Corruption System

Information Security Risk

Operational Risk Management



117

115

employees

Announcements 21st March **30th** March

10th April

21st June

30th June

31st July

11th August

30th September

4th October

27th November

20th November

30th November **7**th December

116 employees

117

employees



Sarbanes-Oxley Act

15th May

Money Laundering and Terrorist Financing Risk Management System



117 employees

115 employees



Business Continuity

Weekly

25th August 27th November

Risk Management Framework



117 employees