

# RISK CULTURE

Grupo Aval believes that effective risk management drives strong performance and reinforces the resilience of the entities within the group. Accordingly, it upholds a risk management strategy designed to ensure that every employee — including all non-executive directors, the CEO, CFO, CRO, and senior executives of both the Financial Holding and its subsidiaries — clearly understands their role in this process.

As part of strengthening our risk culture, we promote:



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

For risk management, Grupo Aval has a model that includes governance elements such as:



aimed at managing different types of risk:



and the adoption of mechanisms to monitor the risk levels to which the Financial Holding and its subsidiaries are exposed.



through the new employee onboarding program, annual reinforcement training, and knowledge evaluation for existing employees within the Holding;

In the subsidiaries, **an average of 96% of personnel received training**. Follow-up was conducted with employees who did not participate in order to validate the reasons for their absence (such as leave, medical incapacity, or vacation, among others) and to ensure, whenever possible, that the training was completed. **disabilities, vacations, among others) and to ensure, when possible, that the training was completed.**

Below are details of the risk systems, the number of employees trained, and the frequency with which messages are reinforced in the Financial Holding:

			Messages
01	Information Security Risk	115 employees	february 27, march 1, november 20, december 13
02	Anti-Bribery and Anti-Corruption System	115 employees	february 14, february 19, april 1, april 25, may 27, june 28, november 8, november 15, december 11
03	Operational Risk Management	113 employees	april 29, june 11, september 20
04	Sarbanes-Oxley Act	115 employees	→ march 11
05	Money Laundering and Terrorist Financing Risk Management System	115 employees	
06	Business Continuity	113 employees	
07	Risk Management Framework	114 employees	