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At Grupo Aval Acciones y Valores S.A. ("Grupo Aval") we firmly believe that corporate value is strengthened when economic development, social well-being and transformation towards environmental balance are integrated.

For this reason, we are committed to integrating sustainability as a strategic axis that drives profitability, strengthens the confidence of our stakeholders, guides every decision, investment, and relationship we establish, and contributes to the progress of present and future generations.

We adopt the best responsible business practices, aligned with globally recognized frameworks and standards, such as the Principles for Responsible Banking (PRB), Principles for Responsible Investment (PRI) and the Global Compact, which guide the financial sector to align its strategies with the Sustainable Development Goals promoted by the United Nations and the Paris Agreement.

This commitment translates into comprehensive management of ESG (environmental, social and corporate governance) factors, aimed at generating value in three key dimensions:

- **Economic value:** we promote sustainable profitability by identifying risks and opportunities that benefit both our shareholders and investors, stakeholders, as well as society as a whole, with a medium and long-term view.
- **Environmental value:** we act responsibly and with the conviction to mitigate our environmental impacts, protecting, conserving and restoring biodiversity and natural resources, as well as implementing mitigation and adaptation measures in the face of the possible effects of climate change.
- **Social value:** we promote inclusive development, generating well-being for our employees, suppliers, communities and society in general, through initiatives that strengthen the social fabric, generate opportunities and promote equity.

This Policy is approved by the Board of Directors, must be executed by Senior Management, and establishes a common framework of guidelines that guide decision-making and sustainability management in all the entities that are part of Grupo Aval.

1. SCOPE

This Policy applies to "Grupo Aval" and its entities, which must adopt it or formulate their own, ensuring its coherence and alignment with the guidelines established in this document.

In addition, the Policy sets out guidelines that extend to suppliers, customers, strategic allies and other stakeholders.

2. GUIDELINES

Economic and Corporate Governance Dimension

- Integrate ESG issues into business strategy, decision-making and management across different areas of the organization. To achieve this, it will be necessary to determine the materiality of ESG issues, define the main stakeholders, and prioritize the United Nations Sustainable Development Goals (SDGs).

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- Apply the principle of double materiality, that is, determine the impact of environmental, social and corporate governance factors on the financial performance of the organization, as well as the effects of our operations on the environment and society. This analysis must be updated periodically, at least every two years, with annual reviews to incorporate regulatory, strategic, or stakeholder expectation changes.
- Establish a corporate governance model that ensures the integration and deployment of sustainability issues across the organization. The Board of Directors, with the support of bodies with experience and knowledge in ESG matters, will be responsible for monitoring the progress and management of these issues on a semi-annual basis.
- Define short- and medium-term goals and objectives for ESG issues, ensuring that economic growth is aligned with social well-being, environmental protection, and proactive management of ESG risks and opportunities.
- Strengthen transparency, accountability, sustainable management, and stakeholder trust through the disclosure of ESG information, based on national and international frameworks, standards, rankings, and regulatory guidelines, according to the nature of the sector, the business model, and the material issues of each entity.
- We recognize the relevance of participating, when applicable or required by Grupo Aval, in initiatives that enable us to determine progress in ESG issues or contribute to their management. This includes assessments such as S&P Global's Corporate Sustainability Assessment (CSA), frameworks such as the Global Reporting Initiative (GRI), Sustainability Accounting Standards Board (SASB), the United Nations Global Compact, the Principles for Responsible Investment (PRI), the Principles for Responsible Banking (PRB), and regulatory requirements such as the external circulars of the Superintendencia Financiera de Colombia, among others.
- Technically evaluate, based on materiality, business model, and regulatory context of each entity—and with prior approval from the corresponding corporate governance body—the participation in industry associations or adherence to initiatives, and establish monitoring and periodic review mechanisms to assess continuity, updating, or withdrawal, ensuring alignment with the entity's strategy, risks, and sustainability commitments. Such participation or adherence must be coordinated with Grupo Aval.
- Ensure clear, transparent and responsible communication about sustainability actions, projects and strategies. The disclosure of the topics must be appropriate to the different stakeholders. Any disclosure should be based on verifiable information and avoid claims that could lead to unsubstantiated perceptions of ESG impact.
- Foster an organizational culture based on ethics, integrity, transparency, and regulatory compliance, which in turn reflects a strong commitment to social and environmental responsibility. This includes strengthening training and promoting the participation of key stakeholders in these areas.
- Incorporate environmental, social, climatic and nature-related risks in a structured and progressive manner, within the comprehensive risk management system, considering both the risks inherent to the operation and those derived from the activity of customers and counterparties. These risks must

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be identified, assessed, managed and monitored in accordance with the Risk Appetite Framework (RAF) and the entity's comprehensive risk policy, ensuring their alignment with sustainability commitments and with a preventive approach that strengthens resilience to current and future challenges.

- Incorporate ESG criteria into analysis and decision-making processes related to investments and financing, through due diligence practices that integrate the analysis of risks and opportunities for resource allocation. This incorporation must be applied in proportion to the size, complexity and business model of each entity, considering its risk appetite for sectors with greater exposure, and seeking to prioritize projects with a sustainable approach.
- Measure, evaluate, manage and transparently report the progress of sustainability strategies in Grupo Aval's ESG indicator system.
- Promote sustainable finance through the design and offer of a portfolio of products with an environmental, climate and/or social focus, as well as promote access to and strategic use of sustainable funding mechanisms as a tool to finance responsible growth and strengthen financial resilience. These actions must be developed in an articulated manner with the different areas of the business to contribute to the transition to a low-carbon economy, the closing of social gaps and inclusive development, in alignment with the best practices of the financial sector and with national and international frameworks.
- Guarantee periodic training processes on ESG issues, aimed at both the Board of Directors and the different levels of the organization, to strengthen informed decision-making, aligned with sustainability commitments. These training sessions should be updated regularly to respond to the evolution of regulatory frameworks, international standards, and stakeholder expectations.

Environmental Dimension

- Measure and report annually greenhouse gas (GHG) emissions corresponding to scopes 1 and 2, as well as the most relevant scope 3 categories, in accordance with the guidelines of the Greenhouse Gas Protocol (GHG Protocol).
- Promote comprehensive management of greenhouse gas (GHG) emissions of scopes 1 and 2, prioritizing their direct reduction, and incorporate capture, removal, and offset actions in a complementary manner, in coherence with annual goals defined by each entity, the country's commitments, and the objectives of the Paris Agreement.
- Strengthen the quantification of financed emissions, to determine initiatives to mitigate or compensate environmental impacts.
- Develop climate strategies, based on climate change mitigation and adaptation, aligned with voluntary and regulatory frameworks to promote decarbonization and the reduction of the environmental impact of the business and the financed portfolio.
- Promote eco-efficiency and the responsible use of natural resources in operations, implement circular economy initiatives, and ensure sustainable waste management.

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- Progressively integrate biodiversity into risk management and financial decisions, identifying impacts and dependencies on operations and investments, and promoting the financing of initiatives that contribute to conservation, regeneration and sustainable use, in line with national and international frameworks.

Social Dimension

- Promote respect for human rights across all operations and the value chain, through due diligence processes that identify, prevent, mitigate, and, where appropriate, remediate potential impacts, in line with the United Nations Guiding Principles on Business and Human Rights.
- Guarantee safe and healthy working conditions and environments for employees, suppliers, contractors, visitors and, in general, for all people who carry out activities in the company's facilities, complying with current legal regulations on occupational health and safety.
- Implement initiatives that promote the well-being and personal and professional development of employees, fostering a culture that values talent, promotes continuous learning, and strengthens the sense of purpose and belonging.
- Implement actions that promote equal opportunities at all levels of the organization and promote an inclusive, equitable work environment free of discrimination, workplace harassment and sexual harassment.
- Promote responsible practices in the value chain and promote the incorporation of sustainability criteria in the purchasing, selection and management process of supplier development.
- Promote financial education as a tool to strengthen informed and responsible decision-making on the use and management of money, promoting equitable access to knowledge and the inclusion of diverse population groups.
- Drive financial inclusion through strategies that promote access, use, and quality of financial services for traditionally underserved populations, in accordance with institutional approaches and priorities. Additionally, some of these initiatives will be coordinated to maximize impact as a Group.
- Promote the development and execution of high-impact projects with a social and/or environmental focus, which generate tangible benefits for stakeholders and in the communities or areas of influence, applying monitoring and evaluation tools that allow understanding the scope and impact of the initiatives, and promoting, when relevant, the establishment of partnerships, support for external initiatives or financing of own initiatives.

3. STAKEHOLDER MANAGEMENT

At Grupo Aval, we recognize that constant and transparent dialogue with our stakeholders is essential for the sustainable development of the organization. For this reason, we identify and analyze our main audiences, promote communication through channels and participation mechanisms, and develop actions that strengthen the ties and allow us to respond effectively to their needs.

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Our main stakeholders are:

- **Shareholders and investors:** Shareholders and bondholders of the company.
- **Subsidiary entities:** Entities over which Grupo Aval exercises direct or indirect control.
- **Employees:** Human team that makes it possible to achieve organizational objectives and who manage projects in our subsidiaries.
- **Suppliers:** People and companies that provide us with supplies and services.
- **Government and regulatory bodies:** Organizations that issue regulatory requirements and carry out constant and permanent monitoring of the financial and non-financial information of the Holding and our subordinate entities.
- **Media and opinion leaders:** Mass and digital media, and people who publish information about us and our entities and who are important for brand and reputation management.
- **Community:** People and communities that we impact directly or indirectly with the activities, decisions and programs we carry out.
- **Others:** Those identified and prioritized by the entities.

4. SUSTAINABILITY GOVERNANCE

Grupo Aval's sustainability model is designed to ensure decision-making aligned with strategic purposes, integrating environmental, social and corporate governance (ESG) criteria into corporate management.

The **Board of Directors** is the highest management body in ESG matters and has the responsibility of defining the sustainability strategy and approving corporate policies related to social and environmental issues, including climate change. Their role is to ensure proper management of these aspects, and to promote the sustainable development of the organization. For monitoring and decision-making on ESG matters, the Board of Directors has the **ESG Committee**, made up of three of its members with a diversity of knowledge and preferably with experience in sustainability. This Committee analyzes the alignment of the strategy and policies with the strategic objectives of the group and with international best practices.

The **Presidency of Grupo Aval**, with the support of the **Corporate Vice Presidency of Sustainability and Strategic Projects (ESG Officer)**, is in charge of leading the sustainability strategy, communicating progress to the Board of Directors and integrating these principles into the decision-making of the business model.

The **Corporate Vice Presidency of Sustainability and Strategic Projects** is in charge of implementing the Corporate ESG Policy, integrating the initiatives of the different areas to ensure coherent and effective management, monitoring the progress of the commitments established in ESG matters, proposing guidelines for the implementation of this Policy in the group's entities, consolidating, analyzing and disseminating sustainability information, and providing timely training to different stakeholders on environmental, social and corporate governance issues, including those related to climate change.

The **Corporate Vice Presidency of Risk and Compliance** is responsible for the identification and management of risks and opportunities related to social and environmental issues, including climate change.

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The **Entities Sustainability Committee** is responsible for coordinating the execution of actions and promoting the adoption of best practices and international standards. It is also responsible for ensuring that ESG principles are effectively integrated into the group's sustainability strategies, strengthening regulatory compliance, risk management, operational efficiency and innovation.



RELATED DOCUMENTS

At Grupo Aval we have the following policies, codes and declarations that complement the proper management of sustainability in Grupo Aval and its subordinate entities:

- Corporate Human Rights Policy.
- Corporate Diversity, Equity and Inclusion Policy.
- Sustainable Purchasing Policy.
- Occupational Health and Safety Policy.
- Code of Ethics and Conduct.
- Code of Good Governance.
- Sustainable Finance Statement.
- Financial Inclusion Statement.

CHANGE CONTROL

DATE	VERSION	REASON FOR THE CHANGE
30-07-2025	2	General review and adjustment of the document, approved at the meeting of the Board of Directors on July 30, 2025 under Minute No.475

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