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1. PROCESS

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2. INTRODUCTION

Grupo Aval Acciones y Valores S.A. (“Grupo Aval” or “the Company”) fully recognizes the importance of guaranteeing employees the effective enjoyment of their free time, rest periods, leave, permissions, and/or vacations, as part of ensuring work-life balance.

In line with the provisions of Law 2191 of 2022, Grupo Aval hereby issues this Workplace Disconnection Policy, which is aligned with its commitment to compliance with labor legislation, productivity, and the balance between professional and personal life.

All employees have the right to clarity regarding their working hours and schedules. These will be determined by the Company’s operational needs, and any modifications or adjustments will be duly communicated in a timely manner.

3. OBJECTIVE

To define the guidelines for creating, regulating, and promoting employees’ right to workplace disconnection, encouraging the enjoyment of free time, rest periods, leave, permissions, and/or vacations in order to foster work-life balance.

4. SCOPE

The policy related in this document will apply to all employees of Grupo Aval Acciones y Valores S.A., with the exception of those who labor legislation and Law 2191 of 2022 establishes that they will not be subject to this regulation and that corresponds to the following:

- a) Workers who hold positions of management, trust and/or management.
- b) Those who, due to the nature of the activity or function they perform, must be permanently available.
- c) Those workers who, due to force majeure or fortuitous event, are required to fulfill extra duties of collaboration with the Company, when they are necessary for the continuity of the business or to solve difficult or urgent situations in the operation of the Company, provided that the absence of another viable alternative is justified.

5. REGULATION

Law 2191 of 2022 – Labor Disconnection Law

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6. GUIDELINES

6.1 GENERAL

Grupo Aval firmly believes that workplace disconnection is an essential tool to foster a healthy balance between professional and personal life. Accordingly, this policy seeks to reinforce and raise awareness among all employees of the importance, need, and benefits of promoting workplace disconnection outside of working hours.

To achieve this objective, the following guidelines are established, and it is the duty of all employees to understand and comply with them:

- i. All employees must promote a culture of respect for non-working hours.
- ii. Except in exceptional cases, no employee shall feel obligated to respond to work-related requests received outside of their working hours, regardless of the communication channel used.
- iii. Any decision by employees to attend to work matters outside their regular working hours shall be entirely discretionary and voluntary.
- iv. Any employee who feels that their right to workplace disconnection is being violated shall have the right to use the mechanism provided in this policy, without fear of retaliation.

6.2. Use of Information and Communications Technology Tools

Given the nature of the Company as a holding entity and its operations, employees may be contacted through various technological and communication tools, such as telephones, tablets, and computers. In line with the previous section, and regardless of the medium used for communication, this policy establishes that employees are expected to respond to such messages and requests during their regular working hours, thereby ensuring effective rest and disconnection after work.

In order to ensure that these guidelines apply during vacation and leave periods, employees are required to activate their automatic out-of-office notification during such absences, specifying the start and end dates of the absence and the name of the person responsible for covering their duties during that period.

6.3 Internal Procedure for the Protection of the Right to Disconnection

As specified above, any employee who feels that their right to disconnect from work is being violated can make use of the mechanism provided for in this policy without fear of retaliation.

Complaints regarding potential non-compliance with this policy shall be submitted to the Human Talent Department by sending an email to desconexionlaboral@grupoaval.com. The Human Talent Department will review the information received and verify compliance with this policy, taking the appropriate actions in coordination with the relevant areas.

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- ✓ This policy is part of the employment contract, internal work regulations and is complemented by the guidelines established therein.

6.4 COMPLIANCE

Failure to comply or any type of violation of this policy constitutes serious misconduct and consequently the Company may adopt the corresponding disciplinary measures, including the termination of the employment contract with just cause, in accordance with the provisions of the Internal Labor Regulations, the employment contract and the Substantive Labor Code.

CHANGE CONTROL

DATE	VERSION	REASON FOR THE CHANGE
Dec-2022	1	Issuance of the document
Nov-2024	2	Review with legal advisors and ARLs

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