

TABLE OF CONTENTS

| | |
|---|---|
| 1. PROCESS | 2 |
| 2. OBJECTIVE | 2 |
| 3. SCOPE | 2 |
| 4. REGULATION..... | 2 |
| 5. GENERAL GUIDELINES | 2 |
| 5.1 Relevant Aspects of Sexual Harassment..... | 2 |
| 5.2 Internal Procedure in Case of Complaints of Possible Sexual Harassment Conduct in the Workplace | 4 |
| 5.3 External Bodies to Which Sexual Harassment Conduct May Be Reported | 4 |
| 5.4 Non-compliance | 5 |

| | | | | | |
|-------|----------|----------|---|--------------|--------------------------|
| Code: | PO-SST-5 | Version: | 0 | Date Updated | 11/18/2024 2:44:00 PM |
|-------|----------|----------|---|--------------|--------------------------|

1. PROCESS

SG-SST

2. OBJECTIVE

This policy regulates the mechanisms for preventing, protecting, and correcting acts of violence and sexual harassment within the workplace at Grupo Aval Acciones y Valores S.A. (Grupo Aval).

Grupo Aval fosters courteous, mutually respectful, consensual, pleasant, and non-coercive interactions that are appropriate, acceptable, and welcomed by both parties.

3. SCOPE

This policy applies to all individuals working with Grupo Aval, including direct employees, mission workers, contractors, students in training (including interns), without discrimination of gender, age, religion, ethnicity, sexual orientation, gender identity, position, seniority, or any other personal or work-related condition.

Grupo Aval will keep complaints and investigations confidential, and the information will be strictly disclosed in the events in which there is a need to know it.

4. REGULATION

- Constitución Política de Colombia (Colombian Constitution)
- Law 599 of 2000
- Law 1010 of 2006
- Law 1257 of 2008
- Law 1719 of 2014
- Decree 1072 of 2015
- Law 2365 of 2024.
- Any other concordant regulations that modify, replace, or supersede the aforementioned laws.

5. GENERAL GUIDELINES

Through this Policy, Grupo Aval establishes the procedure to prevent, protect, and address sexual harassment in the workplace.

5.1 Relevant Aspects of Sexual Harassment

MODALITIES:

Sexual Harassment in the Workplace: Any unwanted conduct of a sexual nature in the workplace or related to it, causing the person to feel offended, uncomfortable, humiliated, and/or intimidated. The following behaviors are considered sexual harassment:

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|-------|----------|----------|---|--------------|--------------------------|
| Code: | PO-SST-5 | Version: | 0 | Date Updated | 11/18/2024 2:44:00 PM |
|-------|----------|----------|---|--------------|--------------------------|

✓ Physical sexual harassment: groping or touching, unnecessary proximity, pinching, patting, squeezing, caressing, deliberate brushing, unnecessary physical contact, physical aggression, lascivious or obscene looks, winking, stalking, intentionally blocking passage.

✓ Verbal sexual harassment: whistling or verbal expressions with sexual connotation (whistles, howls, barking, kissing sounds), sexually explicit jokes, sexual comments or insinuations, questions about sexual fantasies, insults based on a person's sex, identity, sexual orientation, or race/ethnicity-related stereotypes.

✓ Harassment based on gender/sexual orientation: any behavior targeting a person's gender, identity, or sexual orientation with the purpose of undermining their dignity or creating an intimidating, degrading, or offensive environment.

✓ Non-verbal sexual harassment: displaying sexually explicit or pornographic photos, images, videos, or audios; exhibitionism or public masturbation; taking photos of someone's body without consent; sexual gestures; forcing someone to kiss; voyeurism in bathrooms or dressing rooms; unwanted physical contact

- **Presumption of Occurrence of Workplace Sexual Harassment:**

Regardless of the nature of the relationship, it will be understood that the interactions between people, agents, employers, contractors for the provision of services, interns, interns and other people who participate in the work context are part of the work context. It will be presumed that the conduct was committed in the work context, when it is carried out in the following spaces or contexts (Art. 7 Law 2365 of 2024):

- The workplace or where the contractual relationship is developed in any of its modalities, including in public and private, physical and digital spaces when they are a space to carry out the assigned obligations, including working from home, remote work and teleworking.
- Places where the remuneration resulting from the work or work entrusted in any of the contractual modalities is cancelled, where they take their rest or where they eat, or where they use sanitary or toilet facilities and in the changing rooms within the work context.
- Travel, travel, events or social or training activities related to work or the work entrusted to them in any of its modalities.
- Within the framework of communications that are related to work or the work entrusted in any of its modalities, including those carried out digitally or in the use of other technologies.
- Journeys between the home and the place where the work or the work entrusted to it in any of its modalities is carried out, when the sexual harassment is committed by a person who is part of the work context.
- In the accommodation provided by the employer, when the sexual harassment is committed by a person who is part of the work context.

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|-------|----------|----------|---|--------------|--------------------------|
| Code: | PO-SST-5 | Version: | 0 | Date Updated | 11/18/2024 2:44:00 PM |
|-------|----------|----------|---|--------------|--------------------------|

Engaging in conduct that constitutes sexual harassment will be classified as a Serious Misdemeanor and may lead, after the corresponding verification, to the imposition of a disciplinary sanction or the termination with just cause of the employment contract in accordance with numeral 6) of paragraph a) of article 62 of the C.S.T. a rule substituted by Article 7 of Decree 2351 of 1965.

5.2 Internal Procedure in Case of Complaints of Possible Sexual Harassment Conduct in the Workplace

Any person may file a complaint with the Human Resources Area, which will receive and carry out the corresponding investigation and will guarantee the confidentiality and confidentiality of the information reported by the alleged victim and, for its part, will guarantee due process to the accused. Once the corresponding investigation has been carried out, the Human Resources Area will decide on the measures and decisions to be adopted in the particular case.

Once the person makes the complaint to the Human Resources Area, he/she may, at his/her discretion, decide to process the complaint before the Labor Coexistence Committee ¹by email convivencia@grupoaval.com complying with the procedure that this Committee has established for the verification of alleged offenses that may constitute Workplace Harassment.

In order for the situation to be reported to be objectively and efficiently addressed by the analysis team, it must list the facts, describing what happened, how, when, where and by whom(s), attaching the supports if available.

Once the complaint is filed, the person will be able to expand information and follow up on the procedure carried out by the Committee.

Interviews, visits and other actions will also be carried out to verify the occurrence of the facts denounced, generating the corresponding reports as a history of the case.

After the evaluation work is completed, the conclusions of the case will be generated, and will be shared with the alleged victim.

5.3 External Bodies to Which Sexual Harassment Conduct May Be Reported

Since it is considered a crime, the investigation, prosecution and punishment of acts that constitute sexual harassment in any of its forms is the responsibility of the Fiscalía General de la Nación (Attorney General's Office of Colombia) and the Judges of the Republic.

¹ **COEXISTENCE COMMITTEE:** it is the internal body, made up of representatives of the people hired and the company, which has the function of formulating recommendations and plans for improvement in the relations between the parties in order to build, renew and promote labor coexistence, guaranteeing in all cases the principle of confidentiality of the complaints received. This Committee does not have the power to determine the existence or not of workplace harassment, since it is constituted as a Body to facilitate the resolution of conflicts within the Company.

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|-------|----------|----------|---|--------------|--------------------------|
| Code: | PO-SST-5 | Version: | 0 | Date Updated | 11/18/2024 2:44:00 PM |
|-------|----------|----------|---|--------------|--------------------------|

The criminal process is contemplated in Law 906 of 2004 and comprises three (3) stages, namely: i) the investigation stage, ii) the investigation stage and iii) the trial stage.

To report sexual harassment conduct, the person who considers himself a victim of these can go directly to the Fiscalía General de la Nación (Attorney General's Office of Colombia) or to the following attention centers that also provide support and guidance:

- Immediate Reaction Units – URI.
- User Service Rooms – UAS.
- Centers for Attention to Victims of Sexual Abuse – CAIVAS.
- Comprehensive Criminal Attention Center – CAPIV.
- District Purple Line.
- Anti-Discrimination Unit.
- ELLAS mobile phone application.
- Single Emergency Number.
- Guidance Line for Women Victims of Violence.

In addition to the above, in cases in which the person considered to be the alleged harasser is the hierarchical superior of the person who files the complaint, it must be filed with the Labor Inspectorate, which will be in charge of following up on the complaint, in accordance with the provisions of paragraph 3 of article 11 of Law 2365 of 2024.

5.4 NON-COMPLIANCE

Any person, regardless of the nature of the contractual relationship with Grupo Aval, undertakes to abide by the provisions contained in this Policy and, in this sense, not to engage in conduct that may be considered to constitute sexual harassment in the workplace.

In the case of people who work directly with Grupo Aval, any type of violation of this policy constitutes serious misconduct, which may lead to the termination of the employment contract with just cause in accordance with numeral 6) of paragraph a) of article 62 of the C.S.T, a rule superseded by article 7 of Decree 2351 of 1965 and in accordance with articles 58 and 60 of the same statute.

Within the framework of an internal disciplinary process, the following conduct will be considered as aggravating factors for the determination adopted by the Company with respect to the person denounced:

- The abuse of a position of hierarchical superiority;
- The reiteration of offensive behaviors either to the complainant, or another;
- Existence of two or more affected persons, particularly in severe and very severe cases;

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|-------|----------|----------|---|--------------|--------------------------|
| Code: | PO-SST-5 | Version: | 0 | Date Updated | 11/18/2024 2:44:00 PM |
|-------|----------|----------|---|--------------|--------------------------|

- d. The use of means, ways or forms that directly tend to ensure the impunity of the person denounced;
- e. Any other action of the same level of severity.

Grupo Aval will treat all complaints seriously. The filing of a complaint in good faith will not be used in any case against the complainant nor will it have an adverse impact on their employment situation; however, in the event that a person of the Company makes the presentation of unfounded or malicious complaints, such circumstance constitutes an abuse of this Policy, a situation that will be treated as a serious offense and will give rise to the corresponding disciplinary measures, in the terms of numeral 6) of letter a) of article 62 of the C.S.T. a rule substituted by Article 7 of Decree 2351 of 1965.

Failure to comply or any type of violation of this policy constitutes serious misconduct and consequently Grupo Aval 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 |
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| Nov 2024 | 1 | Issuance of the document |

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