



SOCIAL ANNEX

Social Annex

This document contains complementary and detailed information to the 2024 Management and Sustainability Report, prepared with the aim of enriching, expanding, and deepening the key aspects of human talent management, among others, while strengthening Grupo Aval's transparency and accountability to its stakeholders.

Through an in-depth and systematic analysis of human talent management and the work environment at Grupo Aval, relevant figures and trends are presented broken down by age, gender, job category and nationality. This multidimensional perspective allows us to highlight the organizational complexity, the richness of our human capital and the ability to adapt to contemporary social and labor challenges. Each section differentiates, precisely, when the data correspond only to Grupo Aval Holding, along with the integration of Aval Fiduciaria and Aval Casa de Bolsa, and when its main entities (Banco de Bogotá, Banco de Occidente, Banco Popular, Banco AV Villas, Corficolombiana and Porvenir) are integrated.

3.1.1. Our organization

Grupo Aval's organizational culture is built on an explicit commitment to ensure that each person, regardless of their level, is recognized as a subject of rights and a protagonist of collective development. Convinced that the respect and protection of labor practices go beyond a normative obligation, our policies and internal work regulations have been designed taking as a reference both the universal principles of decent work, promoted by the International Labor Organization (ILO), and the provisions of current Colombian legislation.

This framework translates into concrete actions to guarantee not only compliance with the minimum required, but also the generation of a work environment that promotes well-being and personal fulfillment. Fair and dignified remuneration, always above the Colombian legal minimum wage and subject to annual review indexed by the cost of living (CPI), is the first step in this regard. Respect for the maximum legal working day, the reduction and effective control of overtime, as well as the guarantee of access to paid vacations, are rights protected by the Internal Work Regulations, supervised in the daily operation and periodically validated by our Human Talent team.

Similarly, stability and transparency are an essential part, when there are organizational changes of magnitude that imply possible collective dismissals, mass transfers or substantial modifications of working conditions, the company strictly complies with the procedures provided for by Colombian law. First, prior notification is made to the Ministry of Labor in accordance with the provisions of the Substantive Labor Code, including the request and formal processing of authorization in cases where it is required (articles 67 et seq., and as contemplated in recent case law). This process involves the delivery of supporting documents, the guarantee of the participation of workers' representatives, and the definition of measures that minimize the social impact. Once the corresponding authorization has been obtained, transparent and timely information actions are implemented for the directly affected population.

Finally, we ensure equal pay for equivalent work, without distinction of gender, ethnicity, nationality or any other status. Salary structures are constantly reviewed, and promotion and promotion processes are managed based exclusively on merit, abilities and proven performance. These actions are subject to continuous monitoring and improvement, consolidating a culture of internal fairness and transparency for the entire organization.

3.1.2 Our programs

Salary above the cost of living

At Grupo Aval Holding, the concept of a living wage is based on a comprehensive and constant analysis of the cost of living in our main areas of operation, which goes beyond legal compliance and considers in detail the essential factors for the well-being of our employees, such as the costs of food, housing, transportation, etc. basic services, health, education and other daily expenses that constitute the minimum basket necessary to guarantee an adequate quality of life.

According to the National Administrative Department of Statistics (DANE), the official entity of the Government of Colombia responsible for producing and disseminating the country's fundamental statistics, the average Colombian household is composed of approximately 4 people. According to the official monetary poverty line defined by DANE for 2024, a household of these characteristics requires a minimum monthly income of COP 2,040,644 to not be in poverty. However, living with dignity means having additional resources that allow us to cover, in addition to the basic food basket, the costs of housing, public services, health, education and transportation.

Under technical standards accepted in the sector, and based on studies by DANE itself, it is internationally recognized that the living wage line must be at least between 30% and 50% above the monetary poverty threshold. For this reason, by 2024, it is estimated that a living wage for an average Colombian household is in the range of COP 2,600,000 to 3,000,000 COP per month, a figure that allows its members to live with dignity and stability, and to fully access all fundamental rights.

Grupo Aval Holding periodically validates that its salaries and compensation schemes are above this threshold, ensuring that employees receive a decent and sufficient remuneration to guarantee their well-being and that of their families.

Union collaboration and participation:

The employment relationship at Grupo Aval is based on respect and active collaboration with the workers' representatives. Organizations such as the Joint Committee on Safety and Health at Work (COPASST) and the Workplace Coexistence Committee are formal spaces for participation and dialogue, where safe, fair and harassment-free working conditions are promoted. These collegiate bodies promote the joint construction of internal policies, the attention to concerns and the generation of strategies for integral well-being, reaffirming commitment to a harmonious and transparent work environment.

Expansion of social protection coverage:

In line with Grupo Aval Holding's comprehensive approach to health and well-being, we have expanded social protection coverage for all employees. This includes annual preventive executive medical check-ups, which support early risk detection and encourage healthy lifestyles, reinforcing the Group's commitment to occupational health promotion and prevention. In addition, this benefit is extended to employees' families through preferential rates.

Several entities complement these efforts with specific benefits:

- **Banco de Occidente** provides medical insurance covering EPS surpluses and prepaid medicine for employees and their families, benefiting 3,651 employees with an investment of COP 2,507,321,499.
- **Banco AV Villas** grants prepaid medicine allowances, optical aid, access to preferential medical consultation, agreements with gyms and dental services, as well as support for sick leave and EPS transfers.
- **Corficolombiana** offers prepaid medicine allowances, benefiting 781 employees with more than COP 2,940 million in support.
- **Porvenir** invested more than COP 223 million in 2024 in prepaid medicine allowances.

These enhancements represent a significant opportunity for employees, given the limited coverage of Colombia's social protection system, and further strengthen the health, well-being, and quality of life of Grupo Aval's workforce.

Right to paid holidays:

Grupo Aval guarantees strict compliance with Colombian legislation on the right to paid vacations. In order to promote the rest of employees, 100% of the Holding's employees have the possibility of agreeing with their leaders on the vacation dates they wish to enjoy during the year. On average, during 2024 each employee enjoyed 12.4 days of vacation and during each day of rest they continued to receive payment of their usual salary. This action is aligned with the corporate values of respect for labor rights and seeks to preserve the balance between personal and professional life as a basis for sustainable performance and positive work experience.

Additionally, some entities grant extra-legal vacation benefits, focused on providing greater flexibility in scheduling and financial support, such as vacation bonuses, to enhance employee enjoyment.

Aval Environmental Training

Grupo Aval has structured a comprehensive training process aimed at mitigating the negative effects of both industrial changes and the climate transition, aligning its ESG strategy with the challenges of the global context. From the induction, new employees receive training in key

components of sustainability and climate change, where fundamental concepts, environmental and social impacts, the double materiality approach and corporate goals for climate action are addressed, ensuring that each person understands the regulatory environment, trends and risks associated with the transition.

Example: Corporate induction presentation

SUSTAINABILITY MANAGEMENT

Sustainability evolution at GA

2019

- Serving investors
- Meeting Standards
- Regulatory compliance






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


2024



- Integration with business strategy.
- Sustainability and climate change governance.
- ESG policies.
- Culture of sustainability.
- Materiality and ESG metrics.

Material Issues

| | |
|--------------------------------|--|
| Environmental | <ul style="list-style-type: none"> • Climate change management and mitigation. |
| Social | <ul style="list-style-type: none"> • Inclusion and financial education. • Diversity, equity, and inclusion. • Human talent. |
| Governance and economic | <ul style="list-style-type: none"> • Ethics, corporate governance, compliance, and internal control. • ESG risk management. • Reputation and corporate marketing • Security, information privacy, and data protection. • Sustainable finance. • Profitable and sustainable economic performance. |








Material issues were determined using a dual materiality approach, identifying relevant aspects in the environmental, social, governance, and economic dimensions that influence the value of the business and the impact it may have on the environment.

BUSINESS INTEGRATION



Integrated risk management:

- ESG risk management.
- Ethics, corporate governance, compliance, and internal control

Well-being and organizational culture:

- Human talent.

Social value creation:

- Diversity, equity, and inclusion.
- Inclusion and financial education.

Leadership in markets:

- Profitable and sustainable economic performance.
- Sustainable finance.

Environment:










- Climate change management and mitigation.

Corporate synergies

- Reputation and corporate marketing.
- Security, information privacy, and data protection.

Innovation

This initial awareness is complemented by the dissemination of institutional emails, in which topics such as the effects of climate change, including the loss of biodiversity, the reduction of water resources, the frequency and intensity of extreme events, the impacts on food security and the appearance of vector-borne diseases, as well as the mitigation strategies implemented by the organization, are socialized.

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Example: Climate Change Training

Our decisions to have the power to drive a more **sustainable future.**

What is climate change and what are its main effects?

It refers to long-term changes in temperatures and weather patterns. These changes can be natural, due to variations in solar activity or large volcanic eruptions. But since the 19th century, human activities have been the main driver of climate change, mainly due to the burning of fossil fuels such as coal, oil and gas.

Some of the effects of climate change are:

- Loss of biodiversity.
- Reduced availability of fresh water.
- More frequent and intense climatic events.
- Impacts on agriculture and food security.
- Increase in vector-borne diseases (dengue or malaria).
- Impact on strategic ecosystems.

Learn more about climate change here:
What is climate change? | United Nations

What is Grupo Aval's commitment?

- Achieving **carbon neutrality** in scopes 1 and 2 by 2025
- Reduce our emissions** by 51% by 2030
- Achieving the goal of being **Net Zero** by 2050

What has Grupo Aval achieved to fight climate change?

Together with our entities, we have adopted a low-carbon model, which has allowed us to:

- Plant **more than 3.3 million trees.**
- Protect more than **6,300 species of fauna and flora.**
- Offset more than **6,440 tonnes of CO₂.**
- Avoid the emission of 268 tons of CO₂** by implementing sustainable mobility alternatives.
- We reduced our **water consumption by 2.5% and energy consumption by 7.7%** between 2023 and 2024.
- We used nearly **1,000 tons of solid waste in 2024.**

How can you contribute through your role?

- Promote practices to reduce waste (reuse and recycle).
- Reduces water, energy and paper consumption.
- Use for sustainable means of transport such as bicycles or electric vehicles.
- Share your car with your classmates.
- Share good practices with your colleagues.

Learn more about our commitment to climate change management, and the generation of environmental, social and economic value **in our ESG Corporate Policy**

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Training is reinforced in a transversal way with re-induction processes, where the key elements of the corporate ESG policy, advances and new challenges are updated and deepened.

In addition to this process, there are participations in forums such as **"The sustainable future: value that is generated and shared"**, spaces led by executives and experts where the integration of sustainability into Grupo Aval's business strategy is discussed.

The multidimensional approach of the training process also encompasses the promotion of good environmental practices, waste reduction, rational use of water and energy, and adoption of sustainable transport. The adoption of practices that favor institutional resilience and adaptability to climate and industrial transition scenarios is encouraged, integrating the Sustainable Development Goals (SDGs) as part of ESG risk management.

3.1.3 Prevention of workplace harassment and ethics line

Prevention of workplace harassment and discrimination

In compliance with current Colombian regulations, including the Substantive Labor Code, Law 1010 of 2006 on workplace harassment and other related provisions, Grupo Aval has established a robust policy framework to prevent and address workplace harassment. These policies, which include the Diversity and Inclusion Policy, the Workplace Coexistence Policy and the Sexual Harassment Prevention Policy, clearly establish the guidelines for identifying, reporting and sanctioning any form of harassment, ratifying the organization's commitment to a zero-tolerance stance.

In addition, Grupo Aval has a Corporate Human Rights Policy that articulates the prevention of harassment as an integral part of respect for human dignity at work. This policy strengthens the domestic regulatory framework through the implementation of the Human Rights Due Diligence process, which comprises four fundamental components:

1. **Identification:** Grupo Aval systematically maps human rights-related risks, including workplace harassment, to detect vulnerabilities in its operations and value chain. This process integrates context assessment, internal risk analysis, and stakeholder engagement.
2. **Prevention:** based on identification, preventive programs are designed and deployed that include clear policies, communication campaigns, continuous training, and strengthening of the labor coexistence management system. The coexistence committee plays an essential role, developing activities that promote healthy work environments and foster a culture of respect and zero tolerance.
3. **Mitigation:** when cases or situations that could lead to harassment are detected, Grupo Aval implements immediate actions to minimize negative impacts. This includes complaint management protocols, impartial and confidential investigations, and agile definition of disciplinary and corrective measures, all with the support of the Coexistence Committee and the Human Resources area.
4. **Remediation:** Grupo Aval guarantees reparation and follow-up mechanisms for victims, ensuring adequate reintegration and the reconstitution of a healthy work environment. In confirmed cases, in addition to sanctions, continuous improvement plans and focused training are established to avoid recurrences.

The Labor Coexistence Committee, made up of members appointed in a bipartite manner from among employees and representatives of the company, is the body in charge of managing complaints and promoting prevention actions. Members receive specialized training that prepares them to assume their responsibilities in accordance with current legislation and best international practices.

This commitment is reflected in **the absence of materialized cases about workplace harassment during the last four years**, which shows an active organizational culture and a healthy work environment at Grupo Aval Holding. With this comprehensive and preventive approach, Grupo Aval not only meets its legal obligations, but also strengthens the protection of human rights in the workplace, contributing to the construction of a fair, respectful and inclusive work environment.

Ethics line

Grupo Aval maintains a firm commitment to **the principle of "zero tolerance"** for acts of corruption, ensuring compliance with the highest ethical standards in its operations, in areas such as the management of conflicts of interest, donations, sponsorships, public or political contributions, gifts and invitations, acquisitions, joint ventures and associates, corporate environment and management of third-party intermediaries (TPI). Through the Anti-Corruption Compliance Program (ABAC), the organization integrates the elements of the internal control system to prevent and manage corruption events, directing and promoting the principles and values defined in its business ethics and corporate policies.

In 2024, Grupo Aval and its entities complied with the corporate indicators established regarding high-impact events and reports to the ethics line related to corruption. In the absence of materialized cases, no monetary losses associated with operational, legal, or reputational risks were recorded, reflecting the effectiveness of the control and prevention mechanisms implemented.

As a technical context, it is relevant to note that the Financial Superintendence of Colombia regulates the implementation of ethical lines in the financial sector through its Basic Legal Circular. This regulation requires supervised entities to adequately implement specific channels for the reception of complaints, thus facilitating the effective reporting and management of possible irregularities.

| Reporting Areas | Number of violations 2024 |
|-------------------------------------|---------------------------|
| Corruption or bribery | 0 |
| Discrimination or Harassment | 0 |
| Customer Privacy Data | 0 |
| Conflicts of interest | 0 |
| Money laundering or insider trading | 0 |

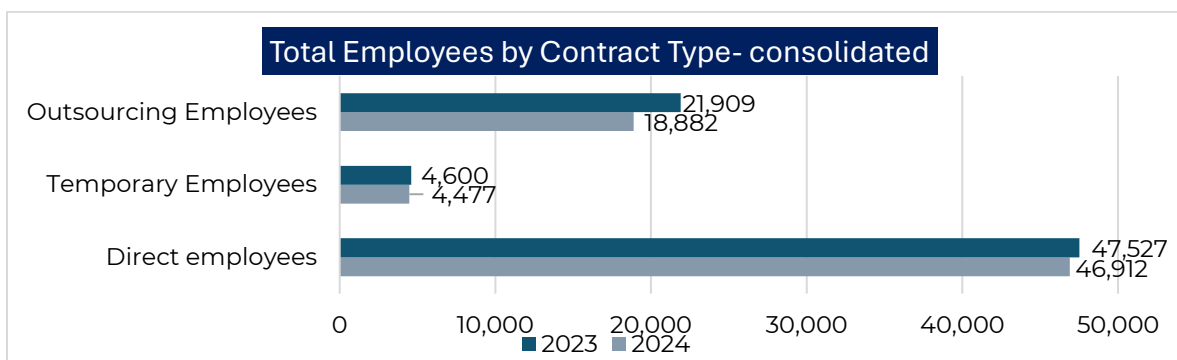
3.1.4 Number of Grupo Aval Consolidated employees, direct contracts, outsourcing and temporary contracts:

This section presents a detailed and updated breakdown of the number of employees in the consolidated Grupo Aval, considering the different contractual modalities, including direct outsourcing and temporary contracts. The variations that occurred between December 2023 and December 2024 are analyzed, both in absolute figures and percentages, detailing the behavior by entity and subsidiary.

| Company | Dec-23 | Dec-24 | Variation | |
|-------------------------------------|---------------|---------------|---------------|--------------|
| | | | # | % |
| Grupo Aval | 124 | 124 | 0 | 0.0% |
| Aval Casa de Bolsa | 151 | 152 | 1 | 0.7% |
| Aval Fiduciaria | 486 | 438 | -48 | -9.9% |
| Banco de Bogotá and subsidiaries | 16,855 | 15,632 | -1,223 | -7.3% |
| Corficolombiana and subsidiaries | 25,407 | 22,684 | -2,723 | -10.7% |
| Porvenir and subsidiaries | 2,469 | 2,464 | -5 | -0.2% |
| Banco de Occidente and subsidiaries | 16,737 | 16,800 | 63 | 0.4% |
| Banco Popular and subsidiaries | 5,576 | 5,680 | 104 | 1.9% |
| Banco AV Villas and subsidiaries | 6,231 | 6,297 | 66 | 1.1% |
| Consolidated Group Total | 74,036 | 70,271 | -3,765 | -5.1% |

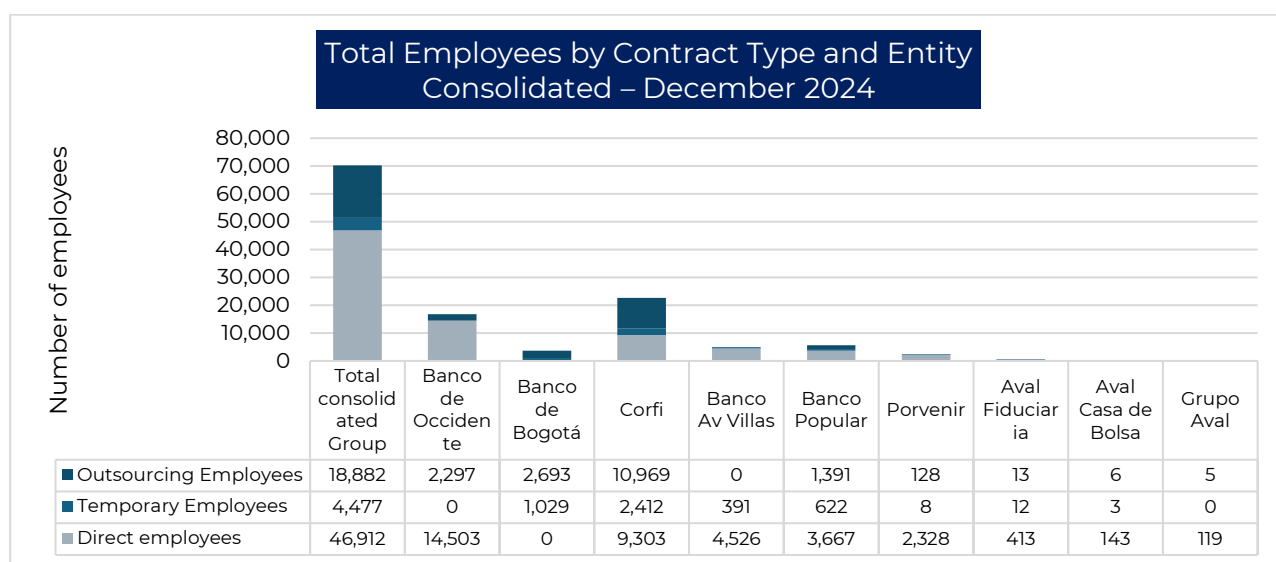
The following graph illustrates the distribution and evolution of jobs at Grupo Aval by type of contract at a consolidated level, comparing the totals for 2023 and 2024 for the three main modalities: outsourcing contracts, temporary employees and direct employees.

It is observed that most employees are linked through direct contracts, with a slight decrease from 47,527 in 2023 to 46,912 in 2024. Regarding outsourcing contracts, there is a significant reduction from 21,909 in 2023 to 18,882 in 2024. This variation is mainly due to the temporary nature of this hiring scheme in Colombia, which is used to cover specific needs; for example, in Corficolombiana after the completion of the construction phase of works in some of its concessions and, at Banco de Bogotá, due to the closure and optimization of physical bank branches. In the case of temporary employees, the variation is marginal, with a slight decrease from 4,600 to 4,477 in the period analyzed.



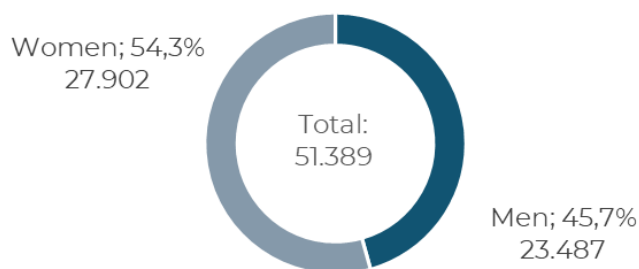
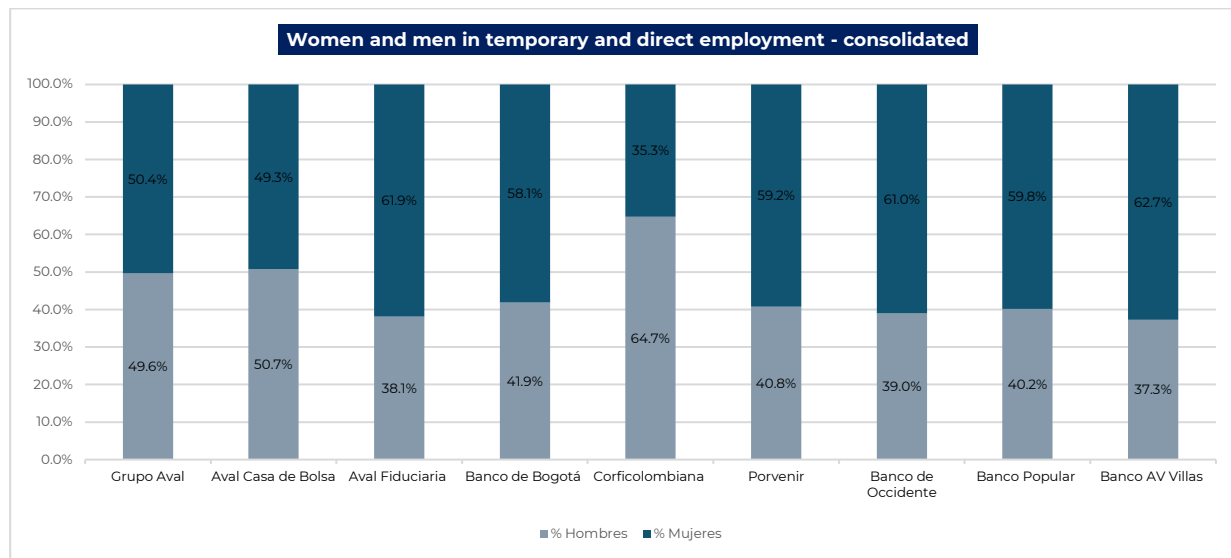
The following chart and the accompanying table present the consolidated structure by type of contract and by entity within the Grupo Aval at the end of December 2024. The number of employees linked through direct, temporary and outsourcing contracts in each of the Group's main entities is detailed. It highlights that, at the consolidated level, most of the workforce corresponds to direct jobs, followed by employees in outsourcing and temporary employees.

When broken down by entity, Banco de Bogotá, Banco de Occidente and Corficolombiana concentrate the highest volumes of personnel in both direct contracts and outsourcing, while smaller entities such as Aval Casa de Bolsa or Grupo Aval have significantly lower volumes in all modalities.



Number of Employees by gender Consolidated: The gender composition of Grupo Aval's workforce

The gender composition of Grupo Aval's workforce, considering only direct and temporary employees (51,389 people), shows that 54.3% are women and 45.7% are men. It should be noted that outsourced personnel are excluded, as these roles typically correspond to non-core functions and their inclusion would not reflect the true scope of the Group's gender equity policies or the internal development of professional talent. Accordingly, Grupo Aval has established a strategic goal of advancing toward gender parity, fostering an inclusive and equitable work environment.



Distribution of employees by job category and gender - consolidated

At Grupo Aval, the distribution of employees by job category and gender reflects a balanced composition at the different levels of leadership, with representation that tends towards parity at the consolidated level.

At the level of senior management and middle management, women represent 44.2% of employees, while men reach 55.8%. It is important to note that these senior management positions, in addition to their administrative responsibilities, have commercial performance indicators, so they are also accounted for within the commercial functions of the organization.

In junior management, women slightly outnumber men with 52.0% compared to 48.0%. In terms of leadership positions in general, the representation of women reaches 50.2%, very close to the balance with male participation, which is 49.8%.

At Grupo Aval, we closely monitor benchmarks in the financial sector, where female participation currently stands at 25.6% on boards of directors and between 40% and 45% in managerial

positions. Building on these benchmarks, we have set ambitious goals that go beyond simply matching these averages: achieving gender parity (50%) in mid-level and junior leadership roles and maintaining female representation above 40% in senior management. In doing so, we reaffirm our commitment to fostering a diverse, equitable, and inclusive workplace, where female talent plays a key role in decision-making and in driving the Group's growth.

| Employees by job category | Gender | Senior management and middle management | % | Junior management | % | Leadership positions | % |
|---------------------------|--------|---|--------|-------------------|--------|----------------------|--------|
| Grupo Aval | Women | 8 | 33,3% | 15 | 44,1% | 23 | 39,7% |
| | Men | 16 | 66,7% | 19 | 55,9% | 35 | 60,3% |
| | Total | 24 | 100,0% | 34 | 100,0% | 58 | 100,0% |
| Banco de Bogotá | Women | 106 | 43,3% | 959 | 56,0% | 1065 | 54,4% |
| | Men | 139 | 56,7% | 753 | 44,0% | 892 | 45,6% |
| | Total | 245 | 100,0% | 1712 | 100,0% | 1957 | 100,0% |
| Banco de Occidente | Women | 21 | 25,9% | 260 | 45,0% | 281 | 42,6% |
| | Men | 60 | 74,1% | 318 | 55,0% | 378 | 57,4% |
| | Total | 81 | 100,0% | 578 | 100,0% | 659 | 100,0% |
| Banco Popular | Women | 35 | 39,8% | 177 | 50,7% | 212 | 48,5% |
| | Men | 53 | 60,2% | 172 | 49,3% | 225 | 51,5% |
| | Total | 88 | 100,0% | 349 | 100,0% | 437 | 100,0% |
| Banco AV Villas | Women | 231 | 55,0% | 326 | 63,2% | 557 | 59,5% |
| | Men | 189 | 45,0% | 190 | 36,8% | 379 | 40,5% |
| | Total | 420 | 100,0% | 516 | 100,0% | 936 | 100,0% |
| Corficolombiana | Women | 185 | 40,5% | 494 | 45,2% | 679 | 43,8% |
| | Men | 272 | 59,5% | 598 | 54,8% | 870 | 56,2% |
| | Total | 457 | 100,0% | 1092 | 100,0% | 1549 | 100,0% |
| Porvenir | Women | 9 | 28,1% | 37 | 48,1% | 46 | 42,2% |
| | Men | 23 | 71,9% | 40 | 51,9% | 63 | 57,8% |
| | Total | 32 | 100,0% | 77 | 100,0% | 109 | 100,0% |
| WEIGHTED TOTAL | Women | 595 | 44,2% | 2268 | 52,0% | 2863 | 50,2% |
| | Men | 752 | 55,8% | 2090 | 48,0% | 2842 | 49,8% |
| | Total | 1347 | 100,0% | 4358 | 100,0% | 5705 | 100,0% |

Number of employees per STEM positions Consolidated Grupo Aval

The distribution of employees in STEM (Science, Technology, Engineering and Mathematics) positions in the Grupo Aval reflects significant gender diversity. In total, the group has 2,576

employees in STEM positions, of which 895 are women, representing 34.7%, while 1,681 are men, with a 65.3% participation. This percentage is aligned with the national average in Colombia, where female representation in STEM fields ranges between 34% and 36%, according to indicators from the National Planning Department.

By entity, in Grupo Aval Holding, there are 72 employees in STEM positions, of which 32 are women (44.4%) and 40 are men (55.6%), Banco de Bogotá concentrates the largest number of STEM talents, with 1,423 employees, where women represent 35.3% and men 64.7%. Banco de Occidente and Corficolombiana show a female participation close to parity, with 43.4% and 44.5% respectively.

Banco Popular and Porvenir have the lowest participation of women, with 34.3% and 25.0%, while Banco AV Villas is the entity with the lowest female representation in STEM, with only 20.2%.

These data show Grupo Aval's commitment to inclusion and the promotion of gender in strategic areas, highlighting opportunities to further strengthen female participation in STEM positions in several entities of the group.

| STEM Position Collaborators | Gender | # | Representativity |
|-----------------------------|--------|------|------------------|
| Grupo Aval | Women | 32 | 44,4% |
| | Men | 40 | 55,6% |
| | Total | 72 | |
| Banco de Bogotá | Women | 503 | 35,3% |
| | Men | 920 | 64,7% |
| | Total | 1423 | |
| Banco de Occidente | Women | 53 | 43,4% |
| | Men | 69 | 56,6% |
| | Total | 122 | |
| Banco Popular | Women | 134 | 34,3% |
| | Men | 257 | 65,7% |
| | Total | 391 | |
| Banco AV Villas | Women | 34 | 20,2% |
| | Men | 134 | 79,8% |
| | Total | 168 | |
| Corficolombiana | Women | 89 | 44,5% |
| | Men | 111 | 55,5% |
| | Total | 200 | |
| Porvenir | Women | 50 | 25,0% |
| | Men | 150 | 75,0% |
| | Total | 200 | |
| WEIGHTED TOTAL | Women | 895 | 34,7% |
| | Men | 1681 | 65,3% |
| | Total | 2576 | |

3.1.5 Number of Employees with a Diversity Attribute – Grupo Aval Consolidated, Direct Contracts

At Grupo Aval, the diversity of employees from different ethnic and cultural origins, such as migrants, Afro-descendants, Palenqueros and indigenous people, is recognized and valued. The representation of these populations varies between entities, contributing significantly to the cultural and social enrichment of the organization.

At the consolidated level of direct employees, 69 migrants were identified, representing 0.20% of the total workforce, along with 364 Afro-descendants, accounting for 1.05%, and 124 Indigenous employees, equivalent to 0.36%. No employees identified as Palenqueros were reported during the period analyzed.

These people occupy various positions within the company, including leadership positions, since the Grupo Aval guarantees that all people, regardless of their ethnic or cultural origin, have the real and equal possibility of accessing leadership positions. This policy reaffirms the group's commitment to inclusion and non-discrimination, promoting a diverse, respectful and competent work environment for all its employees.

| Employees by Diversity | | | |
|----------------------------|---------------|---------------------------------------|--|
| Diverse population | # | % of representation, direct employees | Share in all management positions, including junior, middle and senior management (as % of total management workforce) |
| Migrants | 69 | 0,20% | - |
| Afro | 364 | 1,05% | - |
| Palenqueros | 0 | 0,00% | - |
| Indigenous | 124 | 0,36% | - |
| TOTAL | 2.041 | 5,89% | - |
| Colombian nationals | 46.843 | 99.8% | 22.22% |

| Employees by job category | Migrants | | Afro | | Palenqueros | | Indigenous | |
|---------------------------|-----------|---------------------|------------|---------------------|-------------|---------------------|------------|---------------------|
| | # | % of representation | # | % of representation | # | % of representation | # | % of representation |
| Grupo Aval | 0 | 0,00% | 0 | 0,00% | 0 | 0,00% | 0 | 0,00% |
| Banco de Bogotá | 40 | 0,44% | 200 | 2,21% | 0 | 0,00% | 70 | 0,77% |
| Banco de Occidente | 0 | 0,00% | 111 | 1,66% | 0 | 0,00% | 24 | 0,36% |
| Banco Popular | 12 | 0,40% | 53 | 1,77% | 0 | 0,00% | 30 | 1% |
| Banco AV Villas | 0 | 0,00% | 0 | 0,00% | 0 | 0,00% | 0 | 0,00% |
| Corficolombiana | 17 | 0,17% | 0 | 0,00% | 0 | 0,00% | 0 | 0,00% |
| Porvenir | 0 | 0,00% | 0 | 0,00% | 0 | 0,00% | 0 | 0,00% |
| TOTAL | 69 | 0,20% | 364 | 1,05% | 0 | 0,00% | 124 | 0,36% |

3.1.6 Compensation and gender pay gap

At Grupo Aval holding, the definition of salaries is based on the merit, skills, performance and trajectory of people, leaving aside parameters that may include discriminatory biases.

For new hires, the company supports the processes of attraction, valuation and linking, in the job descriptions that reflect and highlight the experience, training, responsibilities and impact on the course of the business.

When it comes to promotions, in addition to resuming the employee's previous career and the profile of the position, the company has defined a policy that is based on the results of the performance evaluation.

Annually, salary increases are made to employees (executives and non-executives) considering the cost of living in the country through the consumer price index (CPI), the results of the evaluation of the company's performance and results, this review of salary increases is a process in which the Presidency and the compensation committee intervene.

At the same time, periodically, at least once a year, the wage gap is monitored, and actions are established during the execution of salary increases. The average gender pay gap for 2024 is 73.83%, the median gender pay gap is 48.28%.

Additionally, the ratio between the annual compensation of the CEO and the average compensation of the rest of the employees for 2024 is 10.60.

At Grupo Aval, the remuneration of senior executives is made up of a fixed scheme and a variable portion that seeks to encourage the achievement of the strategic and sustainability objectives defined by the conglomerate. The variable portion depends on the fulfillment of goals established in the financial, corporate performance, and health and sustainability pillars, in accordance with the business vision projected to 2030.

The variable compensation model is based on the Balanced Scorecard (BSC) methodology, which allows individual and collective performance to be analyzed in a structured manner with the Group's long-term strategy. In this sense, compliance with corporate performance indicators is a fundamental axis to ensure that management is aligned with strategic objectives, consolidating progress towards a competitive, responsible and sustainable operation over time.

In this way, for each pillar, specific indicators are defined with metrics and weightings that determine the final evaluation. Annually, it is established whether the executive meets, exceeds or does not meet the proposed goals.

The following table presents the structure of the objectives for the President of Grupo Aval:

| Perspective | Indicator | Metric/Formula (Numerator/Denominator) | Weight |
|-------------|-----------|---|--------|
|-------------|-----------|---|--------|

| | | | |
|----------------------------------|---|---|-------------|
| Financial | Compliance with consolidated profit budget | Actual Profit / Budgeted Profit | 20% |
| | Relative stock market performance vs. market | Grupo Aval share return (% annual variation) / Colcap index return (% annual variation) | 5% |
| Corporate Performance | Compliance in strategic projects (e.g. Kairós, RTILB) | Completed Projects / Planned Projects | 15% |
| | Strategic functions serving entities (e.g., training, technology investment) | Deliverables completed / Deliverables planned | 15% |
| | Operational functions serving entities (e.g. committees, financial statements) | Functions completed / Functions planned | 10% |
| | Holding company-specific functions (e.g. Country Code, IR, Dow Jones, work environment) | Goals Achieved / Goals established | 10% |
| Health and Sustainability | Work environment of the area under responsibility | Score obtained / Maximum survey score | 7.50% |
| | Corporate reputation and external presence | IPM Score obtained / Maximum index score | 7.50% |
| | Compliance with ESG targets (including climate change and financial inclusion) | ESG targets achieved / ESG targets defined | 5% |
| | Compliance with the Code of Ethics and Conduct | Number of employees who completed the AVA L guidelines training / Total number of employees | 5% |
| Total | | | 100% |

These evaluation perspectives are also considered for the evaluation of Grupo Aval's senior executives, although the percentage ranges may vary according to the role and level of responsibility of each executive, maintaining consistency with the Group's strategic objectives.

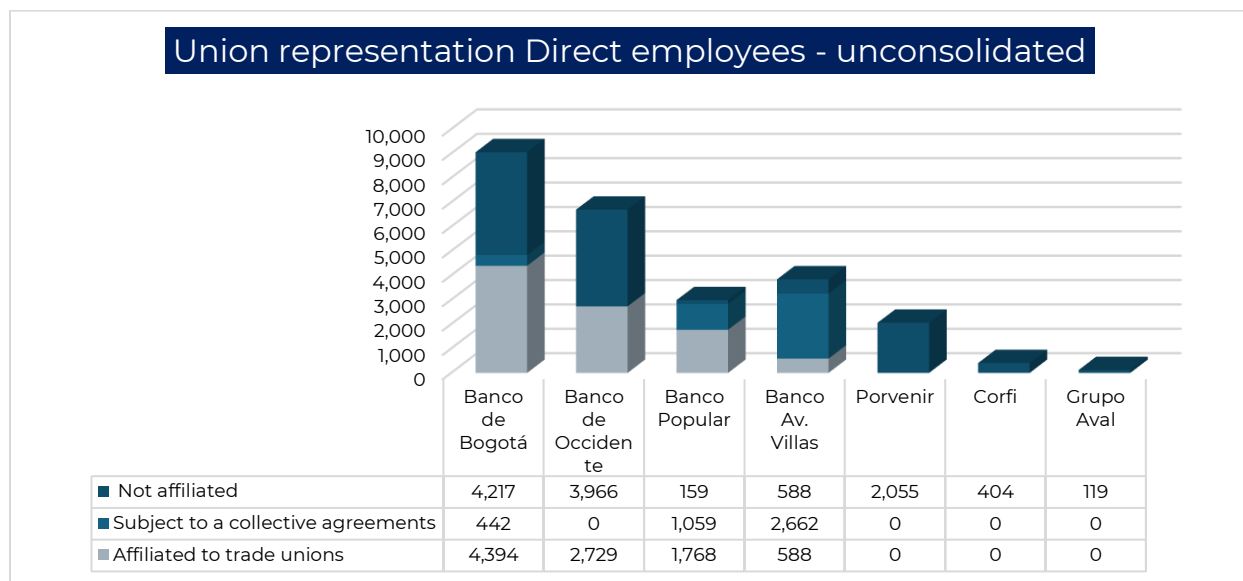
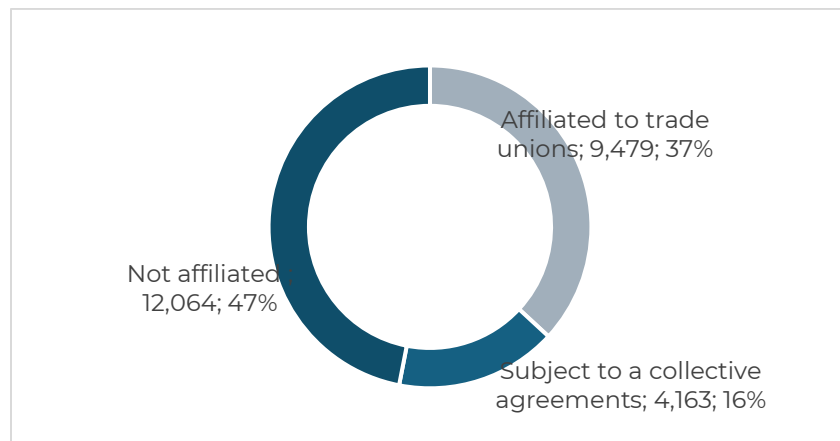
Note: The Risk and Compliance Vice Presidency and the Sustainability Vice Presidency also incorporate Climate-related management incentives into their corporate performance objectives.

3.1.7. Freedom of association

Workers' union representation is defined not only by the number of employees who are members of trade unions, but also by those who are covered by collective bargaining agreements. In this sense, the combination of these two groups reflects the effective coverage of representation in accordance with the provisions of national labor legislation.

In the case of Grupo Aval and its main entities, 37% of employees are directly affiliated to trade unions, constituting the formal basis of active union representation. In addition, 16% of employees are included in collective agreements or conventions, which are the instruments through which working conditions are applicable to groups of employees, regardless of their direct affiliation to a union. Therefore, when these two groups are added, 53% of effective union representation coverage is obtained. The remaining 47% corresponds to employees who are not affiliated or subject to a collective agreement, thus respecting their right to free association or not to associate.

This comprehensive approach complies with the principles and regulations of the Substantive Labor Code and Colombian jurisprudence, recognizing the plurality in the way in which union representation is exercised and protected in the work environment. It also ensures that social dialogue and collective bargaining are representative and effective in safeguarding the rights and interests of most workers.



In relation to unionized and gender-based employees in the Grupo Aval, it can be seen that all these people are concentrated in five main entities, with female representation being predominant in all of them. At Banco de Bogotá, 66% of unionized members are women, equivalent to 3,215 people, while men represent 34% with 1,621 employees. Banco de Occidente shows a similar proportion, with 67% of women unionized and covered by a collective bargaining agreement (1,839) compared to 33% of men (890). Banco Popular and Banco AV Villas also have higher female participation, with 62% and 69% respectively. In total, of the unionized and agreed universe of 13,642 employees, 66% correspond to women (9,038) and 34% to men (4,604). The other entities of the Group do not report to collaborators under this condition.

| Unionized and covered by a collective bargaining agreement by gender | | | | | |
|--|-------------|------------|-------------|------------|--------------|
| Entity | Women | % | Men | % | Total |
| Grupo Aval | 0 | 0% | 0 | 0% | 0 |
| Banco de Bogotá | 3215 | 66% | 1621 | 34% | 4836 |
| Banco de Occidente | 1839 | 67% | 890 | 33% | 2729 |
| Banco Popular | 1752 | 62% | 1075 | 38% | 2827 |
| Banco AV Villas | 2232 | 69% | 1018 | 31% | 3250 |
| Corficolombiana | 0 | 0% | 0 | 0% | 0 |
| Porvenir | 0 | 0% | 0 | 0% | 0 |
| TOTAL | 9038 | 66% | 4604 | 34% | 13642 |

3.3.1 Training and Development of Grupo Aval Employees (Consolidated); Permanent and Fixed-Term Contracts

At Grupo Aval, education and training represent a fundamental strategic investment for the development of human talent. During the period analyzed, a total of 1,837,591 hours of training were accumulated in all the entities of the group, with a weighted average of 75 hours invested per trained employee. This average reflects a balanced and consistent commitment to training, adjusted to the volume and characteristics of each entity.

The total amount invested in education and training was approximately 13,061 million Colombian pesos, with an average amount invested of COP 533,001 per employee trained at the consolidated level.

The differences between entities are notable and respond to their specific sizes and needs. Banco de Bogotá led in total number of hours invested (1,059,562) and average hours per employee (117.03), followed by Banco de Occidente and Banco Popular with significant figures. On the other hand, Banco AV Villas reported a lower average number of hours (10.48), reflecting different training strategies or profiles.

This comprehensive effort in investment and training hours demonstrates Grupo Aval's commitment to constant updating, operational excellence and the strengthening of competencies, key aspects to maintain its leadership in the Colombian financial sector.

| Education and training | Number of hours | Average hours | Average amount invested (COP) | Total amount invested (COP) |
|------------------------|-----------------|---------------|-------------------------------|-----------------------------|
| Grupo Aval | 4.163 | 34,98 | 1,049,420 | 124,880,385 |
| Banco de Bogotá | 1.059.562 | 117,03 | 356,968 | 3,401,549,614 |
| Banco de Occidente | 283.106 | 42,28 | 467,850 | 3,284,311,600 |
| Banco Popular | 161.929 | 54,22 | 325,837 | 972,949,973 |
| Banco AV Villas | 210.941 | 10,48 | 83,523 | 320,144,190 |
| Corficolombiana | 30.010 | 74,28 | 5,721,305 | 2,317,128,401 |
| Porvenir | 87.880 | 42,76 | 1,285,043 | 2,640,763,308 |
| WEIGHTED TOTAL | 1.837.591 | 75 | 533,001 | 13,061,727,471 |

Training and development by gender:

In the analysis of training and training by gender in the Grupo Aval, it is observed that women accumulate a total of 1,178,682 hours of training, against 658,846 hours for men, which reflects a significant investment in women's professional development. The average number of hours per employee trained is 48.10 for women and 26.89 for men, at the consolidated level, with an overall average of 74.98 hours when considering the total.

In economic terms, the average amount invested per female employee is approximately COP 8,378 million, while for men the investment is COP 4,683 million, equivalent to a total of COP 13,061 million for the entire group. This analysis shows an increased focus and resources directed at women's training.

| Training - training by gender | | Gender | | |
|-------------------------------|-----------------|----------|----------|----------|
| | | Women | Men | Total |
| Grupo Aval | Number of hours | 2.273,00 | 1.890,00 | 4.163,00 |
| | Average hours | 19,10 | 15,88 | 34,98 |

| | | | | |
|-----------------------|-------------------------------|---------------|---------------|----------------|
| | Average amount invested (COP) | 68,184,750 | 56,695,635 | 124,880,385 |
| Banco de Bogotá | Number of hours | 669.600,00 | 389.901,00 | 1.059.501,00 |
| | Average hours | 73,96 | 43,07 | 117,03 |
| | Average amount invested (COP) | 2,149,764,485 | 1,251,785,129 | 3,401,549,614 |
| Banco de Occidente | Number of hours | 181.121,00 | 101.984,00 | 283.105,00 |
| | Average hours | 29,23 | 16,46 | 45,68 |
| | Average amount invested (COP) | 2,101,191,435 | 1,183,120,165 | 3,284,311,600 |
| Banco Popular | Number of hours | 98.751,00 | 63.177,00 | 161.928,00 |
| | Average hours | 33,07 | 21,16 | 54,23 |
| | Average amount invested (COP) | 593,348,789 | 379,601,184 | 972,949,973 |
| Banco AV Villas | Number of hours | 156.899,00 | 54.042,00 | 210.941,00 |
| | Average hours | 40,93 | 14,10 | 55,03 |
| | Average amount invested (COP) | 238,124,894 | 82,019,296 | 320,144,190 |
| Corficolombiana | Number of hours | 16.901,00 | 13.109,00 | 30.010,00 |
| | Average hours | 41,73 | 32,37 | 74,09876543 |
| | Average amount invested (COP) | 1,304,957,918 | 1,012,170,483 | 2,317,128,401 |
| Porvenir | Number of hours | 53.137,00 | 34.743,00 | 87.880,00 |
| | Average hours | 27,78 | 18,16 | 45,94 |
| | Average amount invested (COP) | 1,596,748,292 | 1,044,015,016 | 2,640,763,308 |
| WEIGHTED TOTAL | Number of hours | 1.178.682,00 | 658.846,00 | 1.837.528,00 |
| | Average hours | 48,10 | 26,89 | 74,98 |
| | Average amount invested (COP) | 8,378,442,701 | 4,683,284,770 | 13,061,727,471 |

Training and development by job category:

At Grupo Aval, training and education by job category demonstrate a clear concentration of resources and time in functional areas, which account for most of the hours and total investment. At the consolidated level, 1,600,514 hours were dedicated to training in functional areas, with a weighted average of 65.31 hours per employee and a significant investment that exceeds COP 11,382 million pesos.

In contrast, senior management and middle management have a number of training hours of 3,594 and 60,854 hours respectively, reflecting an average number of hours per employee of 0.15 and 20

2.48 hours. Junior management receives moderate attention with 171,725 hours, an average of 7.01 per employee. This indicates a strategy focused on intensively training the operational and functional areas, where most of the talent is concentrated.

| Training - training by job category | | Top management - Top management | Middle management | Junior management | Functional Areas | Total |
|-------------------------------------|-------------------------------|---------------------------------|-------------------|-------------------|------------------|---------------|
| Grupo Aval | Number of hours | 304,00 | 435,00 | 1.271,00 | 2.153,00 | 4.163,00 |
| | Average hours | 2,55 | 3,66 | 10,68 | 18,09 | 34,98 |
| | Average amount invested (COP) | 9,119,298 | 13,048,995 | 38,127,064 | 64,585,027 | 124,880,385 |
| Banco de Bogotá | Number of hours | 126,00 | 29.845,00 | 127.869,00 | 901.722,00 | 1.059.562,00 |
| | Average hours | 0,01 | 3,30 | 14,12 | 99,60 | 117,04 |
| | Average amount invested (COP) | 404,502 | 95,812,466 | 410,502,403 | 2,894,830,242 | 3,401,549,614 |
| Banco de Occidente | Number of hours | 522,00 | 2.135,00 | - | 280.449,00 | 283.106,00 |
| | Average hours | 0,08 | 0,34 | 0,00 | 45,26 | 45,68 |
| | Average amount invested (COP) | 6,055,720 | 24,768,127 | - | 3,253,487,753 | 3,284,311,600 |
| Banco Popular | Number of hours | 651,00 | 4.121,00 | 18.926,00 | 138.230,00 | 161.928,00 |
| | Average hours | 0,22 | 1,38 | 6,34 | 46,29 | 54,23 |
| | Average amount invested (COP) | 3,911,556 | 24,761,171 | 113,717,524 | 830,559,723 | 972,949,973 |
| Banco AV Villas | Number of hours | 127,00 | 12.207,00 | 7.612,00 | 190.095,00 | 210.041,00 |

| | | | | | | |
|-----------------------|-------------------------------|-------------|-------------|---------------|----------------|----------------|
| | Average hours | 0,03 | 3,18 | 1,99 | 49,59 | 54,80 |
| | Average amount invested (COP) | 193,573 | 18,605,892 | 11,602,199 | 289,742,525 | 320,144,190 |
| Corficolombiana | Number of hours | 1.493,00 | 3.659,00 | 5.065,00 | 19.792,00 | 30.009,00 |
| | Average hours | 3,69 | 9,03 | 12,51 | 48,87 | 74,10 |
| | Average amount invested (COP) | 115,281,172 | 282,527,669 | 391,091,184 | 1,528,228,375 | 2,317,128,401 |
| Porvenir | Number of hours | 371,00 | 8.452,00 | 10.982,00 | 68.073,00 | 87.878,00 |
| | Average hours | 0,19 | 4,42 | 5,74 | 35,58 | 45,94 |
| | Average amount invested (COP) | 11,148,674 | 253,985,428 | 330,012,775 | 2,045,616,430 | 2,640,763,308 |
| WEIGHTED TOTAL | Number of hours | 3.594,00 | 60.854,00 | 171.725,00 | 1.600.514,00 | 1.836.687,00 |
| | Average hours | 0,15 | 2,48 | 7,01 | 65,31 | 74,95 |
| | Average amount invested (COP) | 25,558,981 | 432,767,458 | 1,221,234,293 | 11,382,166,739 | 13,061,727,471 |

Training and development by age:

At Grupo Aval, education and training present significant differences according to the different ages of the employees, reflecting approaches adapted to the needs and stages of professional development of each age group.

People under 30 years of age accumulate 1,148,360 hours of training, with a weighted average of 46.86 hours per employee and an average investment of approximately COP 8,162 million pesos. This group concentrates the largest number of total hours, which indicates an important emphasis on initial training and early development.

For employees between 30 and 50 years old, 589,508 hours are invested, with an average of 24.06 hours and an investment of around COP 4,190 million. This segment, which generally corresponds

to professionals in the middle stages of their career, also receives considerable attention to strengthening and updating their skills.

In contrast, people over 50 years of age have a lower number of training hours, 99,722 hours, with an average of 4.07 hours per employee and an investment of approximately COP 709 million.

| Training - training by age | | Under 30 years old | Between 30 and 50 years old | Over 50 years old | Total |
|----------------------------|-------------------------------|--------------------|-----------------------------|-------------------|---------------|
| Grupo Aval | Number of hours | 251,23 | 3.027,76 | 883,84 | 4.162,83 |
| | Average hours | 2,11 | 25,44 | 7,43 | 34,98 |
| | Average amount invested (COP) | 7,536,628 | 90,829,516 | 26,514,241 | 124,880,385 |
| Banco de Bogotá | Number of hours | 754.098,00 | 277.738,00 | 27.726,00 | 1.059.562,00 |
| | Average hours | 83,30 | 30,68 | 3,06 | 117,04 |
| | Average amount invested (COP) | 2,420,907,659 | 891,632,190 | 89,009,765 | 3,401,549,614 |
| Banco de Occidente | Number of hours | 162.324,00 | 100.071,00 | 20.711,00 | 283.106,00 |
| | Average hours | 26,19 | 16,15 | 3,34 | 45,68 |
| | Average amount invested (COP) | 1,883,120,090 | 1,160,923,280 | 240,268,230 | 3,284,311,600 |
| Banco Popular | Number of hours | 32.386,00 | 103.634,00 | 25.909,00 | 161.929,00 |
| | Average hours | 10,85 | 34,71 | 8,68 | 54,23 |
| | Average amount invested (COP) | 194,591,196 | 622,684,618 | 155,674,159 | 972,949,973 |
| Banco AV Villas | Number of hours | 177.087,00 | 28.657,00 | 5.197,00 | 210.941,00 |
| | Average hours | 46,20 | 7,48 | 1,36 | 55,03 |

| | | | | | |
|-----------------------|-------------------------------|---------------|---------------|-------------|---------------|
| | Average amount invested (COP) | 268,764,129 | 43,492,598 | 7,887,463 | 320,144,190 |
| Corficolombiana | Number of hours | 5.224,00 | 20.938,00 | 3.848,00 | 30.010,00 |
| | Average hours | 12,90 | 51,70 | 9,50 | 74,10 |
| | Average amount invested (COP) | 403,354,841 | 1,616,662,261 | 297,111,299 | 2,317,128,401 |
| Porvenir | Number of hours | 16.990,00 | 55.442,00 | 15.447,00 | 87.879,00 |
| | Average hours | 8,88 | 28,98 | 8,07 | 45,94 |
| | Average amount invested (COP) | 510,549,376 | 1,666,031,695 | 464,182,237 | 2,640,763,308 |
| WEIGHTED TOTAL | Number of hours | 1.148.360,23 | 589.507,76 | 99.721,84 | 1.837.589,83 |
| | Average hours | 46,86 | 24,06 | 4,07 | 74,99 |
| | Average amount invested (COP) | 8,162,631,354 | 4,190,265,737 | 708,830,380 | 3,061,727,471 |

Training and development by nationality:

In Grupo Aval, training and education reflect a strong focus on talent development, at a consolidated level, 1,832,258.48 hours of training were registered for national employees, with a weighted average of 74.77 hours per person, accompanied by a total investment of close to 13,023 million Colombian pesos.

On the other hand, training for foreign collaborators is low, with only 5,332.35 hours and an investment of 37.9 million Colombian pesos, which corresponds to an average of 0.22 hours per person. This situation is understandable, given that the number of foreign employees is small compared to the current dynamics of the country and the composition of the team.

| Training - training by nationality | | National | Foreigner | Total |
|------------------------------------|-----------------|----------|-----------|----------|
| Grupo Aval | Number of hours | 4.162,83 | - | 4.162,83 |
| | Average hours | 34,98 | 0,00 | 34,98 |

| | | | | |
|-----------------------|-------------------------------|----------------|------------|----------------|
| | Average amount invested (COP) | 124,880,385 | - | 124,880,385 |
| Banco de Bogotá | Number of hours | 1.054.880,40 | 4.681,60 | 1.059.562,00 |
| | Average hours | 116,52 | 0,52 | 117,04 |
| | Average amount invested (COP) | 3,386,520,123 | 15,029,491 | 3,401,549,614 |
| Banco de Occidente | Number of hours | 283.106,00 | - | 283.106,00 |
| | Average hours | 45,68 | 0,00 | 45,68 |
| | Average amount invested (COP) | 3,284,311,600 | - | 3,284,311,600 |
| Banco Popular | Number of hours | 161.278,25 | 650,75 | 161.929,00 |
| | Average hours | 54,01 | 0,22 | 54,23 |
| | Average amount invested (COP) | 969,039,926 | 3,910,047 | 972,949,973 |
| Banco AV Villas | Number of hours | 210.941,00 | - | 210.941,00 |
| | Average hours | 55,03 | 0,00 | 55,03 |
| | Average amount invested (COP) | 320,144,190 | - | 320,144,190 |
| Corficolombiana | Number of hours | 30.010,00 | - | 30.010,00 |
| | Average hours | 74,10 | 0,00 | 74,10 |
| | Average amount invested (COP) | 2,317,128,401 | - | 2,317,128,401 |
| Porvenir | Number of hours | 87.880,00 | - | 87.880,00 |
| | Average hours | 45,94 | 0,00 | 45,94 |
| | Average amount invested (COP) | 2,640,763,308 | - | 2,640,763,308 |
| WEIGHTED TOTAL | Number of hours | 1.832.258,48 | 5.332,35 | 1.837.590,83 |
| | Average hours | 74,77 | 0,22 | 74,99 |
| | Average amount invested (COP) | 13,023,824,760 | 37,902,711 | 13,061,727,471 |

Types of training – Grupo Aval Holding:

In the training program of the Grupo Aval Holding for 2024, a total of 4,163 hours were invested in various training areas, with a higher participation of women (2,273 hours) compared to men (1,890 hours).

The hours dedicated to technical training stand out with a total of 1,879 hours, being a priority area for both men (1,102 hours) and women (777 hours). In addition, key programs such as skills development and diversity and inclusion registered for 540 and 292 hours respectively, showing an important commitment to updating skills and promoting an inclusive environment.

| Training Program | Hours Spent 2024 | | |
|------------------------------------|------------------|-----------------|--------------|
| | Men | Women | Total |
| Educational aids | 106 | 76 | 182 |
| Welfare | 15.6 | 26 | 41.6 |
| Organizational Culture | 146 | 130 | 276 |
| Skill development | 148 | 392 | 540 |
| Diversity and inclusion (*) | 109,6 | 182,2 | 291,8 |
| Technical Training | 1.102 | 776,95 | 1.878,95 |
| Endorsement Guidelines | 144 | 148,48 | 292,48 |
| Occupational health and safety (*) | 119 | 541 | 660 |
| Grand total | 1.890,2 | 2.272,63 | 4.163 |

(*) These specific programs have additional hours of training that are reflected within other programs such as "Aval Guidelines", "Organizational Culture" and "Skills Development."

3.3.2 Employee development programs Grupo Aval Holding

Leadership Development: we remain committed to strengthening our human team, as we know that they are the ones who drive our competitiveness and leadership in the market. We are constantly seeking specific programs for the identification, training and development of leaders, training our middle and senior management in key leadership skills, team management and strategic decision-making in a dynamic environment. In this way, our employees have access to continuous educational programs.

During 2025, with a cut-off to August, company leaders have strengthened their knowledge and leadership skills by participating in courses on topics such as: Digital leadership, strategy

implementation, strategy and sustainability, financial measurements in the application of IFRS, management and corporate risk management.

AVAL Guidelines: training program that allows to strengthen matters of a regulatory nature and relevant impact for the business. This program addresses topics such as: code of ethics and conduct, purchase of goods and services, sustainability, related parties and conflicts of interest, relevant information, business continuity, exposure and concentration of risks, information security, occupational health and safety management system, SOX, money laundering prevention system, risk management of financial conglomerates, among others. In this program, all employees at their different hierarchical levels invested a total of 292.48 hours of training, women invested a total of 148.48 hours and men 144 hours.

In relation to the **company's code of ethics and conduct**, each employee upon entering the company receives training and undertakes to comply with the provisions of this code. Additionally, in 2024, 100% of employees completed a survey/evaluation, certified in writing that they had not been immersed in possible conflicts of interest during the previous year and, additionally, committed to timely reporting any situation that contravenes the provisions of said document. By 2024, more than 60 hours of training on this topic were invested during the induction and within this "Aval Guidelines" program.

Another of the topics addressed in this program "Aval Guidelines" is **Occupational Safety and Health** where issues associated with risks to which one is exposed in the work environment, emergency response, responsibilities according to the role, among others, are reinforced. Within this section, emphasis is placed on the labor coexistence policy, on the existence of the labor coexistence committee as one of the channels enabled to report possible behaviors of discrimination and/or harassment, recalling the step by step so that employees can make their reports. By 2024, 100% of employees participated and successfully completed this training and evaluation.

Educational Assistance: in 2024, 3.36% of the total employees of Grupo Aval Holding, applied and received this aid in which the company supports their study program (master's, specialization or diplomas) with time and money, complying with a series of requirements that consider consistent and notable performance characteristics, relevance of academic training, contribution to both the role and the company, among others. Of the total number of employees benefiting from the aid in 2024, 50% were women and 50% men.

Retirement support: we value the trajectory and contribution of each employee, which is why we have designed a retirement support and transition program that begins approximately 10 years before the employee meets the requirements to access pension and retirement. This program seeks to provide tools and comprehensive guidance in key aspects such as review of legal requirements, personal finances, pension benefits, life project and other topics that facilitate a smooth and safe transition to this new stage.

Technical training and strengthening of culture: we provide training and training opportunities that have made it possible to strengthen soft skills, specific technical knowledge, promote well-being, mental health and healthy lifestyle habits. The identification of these training needs is done from retirement interviews, performance and other methodologies.

At Grupo Aval, across all entities, various additional training and development programs have been implemented to complement the corporate strategy:

- **Banco de Bogotá:** through “*La U Banboger*”, offers training in multiple strategic areas such as business, regulation, data, leadership, digitalization, and sustainability, covering different hierarchical levels and employee profiles.
- **Banco de Occidente:** operates “*La U*”, which provides more than 100 proprietary courses and over 600 courses in an open academy, in addition to a leadership academy and mentoring program. In 2024, more than **21,000 training sessions** were delivered, fostering continuous talent and leadership development.
- **Banco Popular:** has an official career plan that has benefited **18 employees**, along with a competency development program involving more than **2,900 participants**.
- **Banco AV Villas:** provides **Educational Assistance** for technical, professional, and postgraduate studies, as well as partnerships with institutions such as SENA and universities. In 2024, it developed **27 formal training programs**, **20 self-training sessions**, and other individual development initiatives.
- **Porvenir:** operates the “*University for All*”, which includes learning pathways in areas such as commercial advisory, digital, pensions, operations, and leadership, aimed at employees, clients, and suppliers.
- **Corficolombiana:** has a corporate university structured into four faculties—leadership, finance, management, and digital innovation—with programs that allow credit recognition for postgraduate studies. In addition, **131 employees** participate in the corporate English program.

Investment and education balance

- **Banco de Bogotá:** allocated more than **COP 2.224 billion** in educational assistance for **688 employees**.
- **Banco de Occidente:** invested **COP 1.488 billion** in training assistance for **2,342 employees and their families**.
- **Porvenir:** allocated more than **COP 700 million** in educational benefits, highlighting a **30% increase** in assistance for undergraduate, postgraduate, and certification studies.

In general, these actions are measured not only by the number of participants but also through key indicators such as the **Human Capital Return on Investment (HRIO) Index**, which consistently

remains above 1, demonstrating a strong correlation between investment in talent and value generation.

Additionally, positive trends are monitored in reduced turnover rates, sustained employee satisfaction levels above institutional targets, and the diversification of the workforce, including broad representation across different generations. This robust methodology allows Grupo Aval to accurately assess and manage the tangible impact of its initiatives in strengthening human capital and organizational sustainability.

3.3.3 Return on investment in human capital

Grupo Aval conducts a detailed and rigorous monitoring of the return on investment in human capital, a key indicator to evaluate the effectiveness of policies and programs aimed at the development and well-being of its employees. This indicator is calculated from the difference between total income and operating expenses, discounting personnel-related costs, and then dividing that figure by the total human resources expenses. This method allows you to accurately measure the financial benefits generated by investing in talent, considering not only salaries but also benefits, training, and other costs associated with human capital.

Over the past four years, this strategic investment has been consistently and positively returned. The results show a return that, although it has had slight variations, remains in favorable ranges, ranging between 1.55 and 2.4 times the amount invested. This means that, for every peso allocated to employees, Grupo Aval generates a higher financial value, reflecting that its development, retention and well-being programs effectively contribute to the company's economic performance.

| Return on investment in human capital | | FY 2021 | FY 2022 | FY 2023 | FY 2024 |
|--|-----|-------------|-------------|-------------|-------------|
| (a) Total income | | 39.064.492 | 37.274.770 | 47.658.238 | 46.492.667 |
| Coin: | COP | | | | |
| b) Total operating expenses | | 33.395.990 | 32.405.637 | 45.481.122 | 44.301.190 |
| Coin: | COP | | | | |
| (c) Total employee-related expenditure (salaries + benefits) | | 5.112.451 | 3.455.776 | 3.680.692 | 3.933.244 |
| Coin: | COP | | | | |
| Result HC ROI (a - (b-c)) / c | | 2,11 | 2,41 | 1,59 | 1,56 |

3.3.4 Hiring at Grupo Aval and its entities

At the end of the period, a total of 4,688 vacancies were registered, of which 2,712 were filled by internal collaborators, which represents 58.10% of the internal positions that have been used to cover labor needs. This indicator reflects the organization's strategy in promoting development and internal mobility as a fundamental part of its talent policy.

In terms of the outsourcing process, the average cost per recruitment varied significantly between entities. The weighted average cost of contracting for the consolidated Grupo Aval was approximately COP 3,076,428. This variability is explained by the size of the entities and the nature of the vacancies, where Porvenir and Corficolombiana showed the highest costs, with COP 5,386,382 and COP 13,506,193 respectively.

The total number of new hires was 1,956, which shows the dynamics and pace of incorporation of talent in the group to meet labor demands. Banco de Occidente and Banco de Bogotá lead in volume of new hires with 575 and 513 new hires, respectively, reflecting their weight in the organizational structure.

In summary, Grupo Aval maintains an active balance between the efficient reuse of internal talent and external hiring, optimizing associated costs and guaranteeing the effective coverage of its vacancies, in line with the strategic and operational needs of each entity of the group.

| Vacancies | Open vacancies | Vacancies filled by internal collaborators | Positions filled by internal collaborators (%) | Average cost of hiring (COP) | New hires |
|--------------------|----------------|--|--|------------------------------|-----------|
| Grupo Aval | 24 | 2 | 8,33% | 3,102,147 | 22 |
| Banco de Bogotá | 1.220 | 707 | 57,95% | 5,108,028 | 513 |
| Banco de Occidente | 2.151 | 1576 | 73,27% | 642,769 | 575 |
| Banco Popular | 359 | 167 | 46,52% | 1,168,461 | 192 |
| Banco AV Villas | 396 | 185 | 46,72% | 899,126 | 211 |
| Corficolombiana | 178 | 52 | 29,21% | 13,506,193 | 126 |
| Porvenir | 340 | 23 | 6,76% | 5,386,382 | 317 |
| TOTAL | 4.668 | 2.712 | 58,10% | 3,518,190 | 1.956 |

New hires by gender and age:

For the under-30 age group, a total of 3,445 new hires were registered, where women accounted for 1,529 and men 1,916, showing a majority male participation in this age range. In the age group between 30 and 39 years old, 1,877 new hires were presented, with a more balanced distribution, although men (1,123) still predominate over women (754). Finally, for the 40-year-old group and over, 145 new hires were registered, with a higher male prevalence (106) compared to 39 women.

In total, during the period analyzed, the Grupo Aval incorporated 5,467 new employees, with 2,322 women and 3,145 men.

| New hires by age | Under 30 years old | | | Between 30 and 50 years old | | | Over 50 years old | | | Total | | |
|--------------------|--------------------|-------------|-------------|-----------------------------|-------------|-------------|-------------------|------------|------------|-------------|-------------|-------------|
| | Women | Men | Total | Women | Men | Total | Women | Men | Total | Women | Men | Total |
| Grupo Aval | 2 | 5 | 7 | 7 | 5 | 12 | 2 | 1 | 3 | 11 | 11 | 22 |
| Banco de Bogotá | 220 | 141 | 361 | 85 | 65 | 150 | 2 | 0 | 2 | 307 | 206 | 513 |
| Banco de Occidente | 482 | 322 | 804 | 107 | 80 | 187 | 7 | 11 | 18 | 596 | 413 | 1009 |
| Banco Popular | 38 | 32 | 70 | 69 | 46 | 115 | 2 | 5 | 7 | 109 | 83 | 192 |
| Banco AV Villas | 162 | 84 | 246 | 87 | 58 | 145 | 1 | 4 | 5 | 250 | 146 | 396 |
| Corficolombiana | 500 | 1231 | 1731 | 342 | 815 | 1157 | 24 | 83 | 107 | 866 | 2129 | 2995 |
| Porvenir | 125 | 101 | 226 | 57 | 54 | 111 | 1 | 2 | 3 | 183 | 157 | 340 |
| TOTAL | 1529 | 1916 | 3445 | 754 | 1123 | 1877 | 39 | 106 | 145 | 2322 | 3145 | 5467 |

New hires by gender and job category:

In senior management, 28 new hires were reported, 11 women and 17 men, which suggests a lower number of incorporations, corresponding to the highest levels of leadership.

In middle management, there were 92 hires, with a slight male majority (48 men compared to 44 women), evidencing a more even distribution in positions of intermediate responsibility.

At junior management levels, 142 hires were registered, almost balanced between 72 women and 70 men, showing a significant balance in this category.

Finally, 5,205 new hires were registered in functional areas, with a distribution of 2,195 women and 3,010 men, reflecting a greater male participation in these operational and tactical roles.

| New hires by job category | Top management - Top management | | | Middle management | | | Junior management | | | Functional Areas | | | Total | | |
|---------------------------|---------------------------------|-----|-------|-------------------|-----|-------|-------------------|-----|-------|------------------|------|-------|-------|------|-------|
| | Women | Men | Total | Women | Men | Total | Women | Men | Total | Women | Men | Total | Women | Men | Total |
| Grupo Aval | 2 | 1 | 3 | 0 | 1 | 1 | 2 | 2 | 4 | 7 | 7 | 14 | 11 | 11 | 22 |
| Banco de Bogotá | 0 | 0 | 0 | 6 | 7 | 13 | 9 | 8 | 17 | 292 | 191 | 483 | 307 | 206 | 513 |
| Banco de Occidente | 1 | 2 | 3 | 2 | 2 | 4 | 1 | 7 | 8 | 592 | 402 | 994 | 596 | 413 | 1009 |
| Banco Popular | 2 | 4 | 6 | 4 | 6 | 10 | 3 | 4 | 7 | 100 | 69 | 169 | 109 | 83 | 192 |
| Banco AV Villas | 0 | 4 | 4 | 17 | 11 | 28 | 5 | 6 | 11 | 228 | 125 | 353 | 250 | 146 | 396 |
| Corficolombiana | 6 | 6 | 12 | 15 | 21 | 36 | 49 | 41 | 90 | 796 | 2061 | 2857 | 866 | 2129 | 2995 |
| Porvenir | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 2 | 5 | 180 | 155 | 335 | 183 | 157 | 340 |
| TOTAL | 11 | 17 | 28 | 44 | 48 | 92 | 72 | 70 | 142 | 2195 | 3010 | 5205 | 2322 | 3145 | 5467 |

New hires by gender and nationality:

All incorporations correspond to Colombian nationals, with no records of foreign personnel hired during the period evaluated.

| New hires by nationality | Colombian nationals | | | Foreigner | | | Total | | |
|--------------------------|---------------------|-------------|-------------|-----------|----------|----------|-------------|-------------|-------------|
| | Women | Men | Total | Women | Men | Total | Women | Men | Total |
| Grupo Aval | 11 | 11 | 22 | 0 | 0 | 0 | 11 | 11 | 22 |
| Banco de Bogotá | 307 | 206 | 513 | 0 | 0 | 0 | 307 | 206 | 513 |
| Banco de Occidente | 596 | 413 | 1009 | 0 | 0 | 0 | 596 | 413 | 1009 |
| Banco Popular | 109 | 83 | 192 | 0 | 0 | 0 | 109 | 83 | 192 |
| Banco AV Villas | 250 | 146 | 396 | 0 | 0 | 0 | 250 | 146 | 396 |
| Corficolombiana | 866 | 2129 | 2995 | 0 | 0 | 0 | 866 | 2129 | 2995 |
| Porvenir | 183 | 157 | 340 | 0 | 0 | 0 | 183 | 157 | 340 |
| TOTAL | 2322 | 3145 | 5467 | 0 | 0 | 0 | 2322 | 3145 | 5467 |

3.3.5 Turnover rate of Grupo Aval employees and entities; Direct contracts:

The employee turnover rate is a key indicator for the management of human talent at Grupo Aval, as it reflects stability and commitment within the organization. Recognizing the impact that turnover can have on both operational continuity and the well-being of teams, Grupo Aval and its entities are constantly focusing efforts on developing comprehensive strategies for its reduction. These include development and training programs, improvements in working conditions, internal promotions and recognition schemes. Through these mechanisms, the organization seeks not only to minimize turnover, but to create an environment where talent finds clear opportunities for growth and sustained motivation.

Turnover rate by gender:

The turnover rate by gender in the Grupo Aval shows a dynamic according to the sector, with an overall turnover of 10.16%, where women have a rate of 5.83% and men 4.33%. These indicators reflect an active work environment, which is constantly being renewed, and which promotes mobility and professional development.

| Turnover rate by gender | | | |
|-------------------------|--------------|--------------|------------------|
| Entity | Women | Men | General Rotation |
| Grupo Aval | 4,20% | 15,13% | 19,33% |
| Banco de Bogotá | 3,95% | 3,34% | 7,29% |
| Banco de Occidente | 7,33% | 5,33% | 12,65% |
| Banco Popular | 5,06% | 4,09% | 9,14% |
| Banco AV Villas | 6,65% | 4,17% | 10,83% |
| Corficolombiana | 9,48% | 8,48% | 17,96% |
| Porvenir | 8,78% | 4,91% | 13,70% |
| WEIGHTED TOTAL | 5,83% | 4,33% | 10,16% |

Turnover rate by age:

| Turnover rate by age | | | |
|----------------------|--------------------|---------------------------|-------------------|
| Entity | Under 30 years old | Between 30 - 50 years old | Over 50 years old |
| Grupo Aval | 3,4% | 11,8% | 4,2% |
| Banco de Bogotá | 1,7% | 3,4% | 2,2% |
| Bank of the West | 7,6% | 3,9% | 1,1% |
| Banco Popular | 1,0% | 5,6% | 2,5% |
| Banco AV Villas | 3,7% | 5,8% | 1,4% |
| Corficolombiana | 5,7% | 9,4% | 2,7% |
| Porvenir | 4,1% | 7,2% | 2,5% |

Turnover rate by job category:

| Turnover rate by job category | | | | |
|-------------------------------|-------------------|-------------------|-------------------|------------------|
| Entity | Senior management | Middle management | Junior management | Functional Areas |
| Grupo Aval | 2,5% | 2,5% | 4,2% | 10,1% |
| Banco de Bogotá | 0,0% | 0,3% | 0,9% | 6,1% |
| Banco de Occidente | 0,0% | 0,0% | 0,4% | 12,2% |
| Banco Popular | 0,2% | 0,5% | 1,1% | 7,3% |
| Banco AV Villas | 0,2% | 0,9% | 0,8% | 8,9% |
| Corficolombiana | 1,24% | 0,99% | 2,24% | 13,48% |
| Porvenir | 0,1% | 0,0% | 0,4% | 13,2% |

Turnover rate by nationality:

| Turnover rate by nationality | | |
|------------------------------|---------------------|---------|
| Entity | Colombian nationals | Foreign |
| Grupo Aval | 19,3% | 0,0% |
| Banco de Bogotá | 7,2% | 0,0% |
| Banco de Occidente | 12,7% | 0,0% |
| Banco Popular | 9,0% | 0,0% |
| Banco AV Villas | 10,8% | 0,3% |
| Corficolombiana | 18,00% | 0,0% |
| Porvenir | 13,5% | 0,0% |

Voluntary turnover rate:

The voluntary turnover rate by gender in the Grupo Aval shows differences that reflect the dynamics of talent mobility within the organization. On average, voluntary turnover for women stands at 8.7%, while for men it is higher at 11.1%, resulting in an overall turnover of 9.88%.

Among the entities, Corficolombiana has the highest rates for both genders, with a voluntary turnover of more than 14%, followed by Porvenir with rates of 11.75% in women and 8.80% in men. On the other hand, entities such as Banco de Bogotá and Banco Popular show lower and more balanced rates, with general rotations close to 5-6%.

| Voluntary turnover rate by gender | | | |
|-----------------------------------|-------|--------|------------------|
| Entity | Women | Men | General Rotation |
| Grupo Aval | 5,00% | 13,55% | 9,28% |
| Banco de Bogotá | 5,17% | 6,33% | 5,75% |
| Banco de Occidente | 9,04% | 9,18% | 9,11% |

| | | | |
|-----------------------|-------------|--------------|--------------|
| Banco Popular | 5,60% | 6,00% | 5,80% |
| Banco AV Villas | 8,00% | 9,56% | 8,78% |
| Corficolombiana | 14,40% | 14,73% | 14,57% |
| Porvenir | 11,75% | 8,80% | 10,28% |
| WEIGHTED TOTAL | 8,7% | 11,1% | 9,88% |

3.3.7 Well-being for our employees

At Grupo Aval Holding, we continue to promote the quality of life of our employees through initiatives and strategies that allow a balance between work and personal life, for this reason, we provide social, economic, sports, personal and cultural spaces, complying with 100% of the activities planned for the year. We increased our participation compared to 2023, achieving that 81.03% of the expected population participates in our welfare activities. Our wellness plan together with the occupational health and safety program, allows the participation of our employees and their families, contributing to the work environment and improving work performance. Here are some of the actions conducted during 2024:

Recreation

- During the year 2024 we conducted 10 gastronomy or craft activities within the working day that promote the integration, recreation and mental health of our employees. We achieved the participation of our employees with 86.00% of the expected population.
- As a gift from the company, 28.57% of employees enjoyed a companion "Experiencias Aval", a program that encourages access to events such as festivals and/or concerts. In 2024, we promoted 26 experiences, including: Baum Festival, Viva la Salsa, Concierto Luis Miguel, Juanes, Ana Gabriel, Paul McCartney, Linkin Park, among others.
- The sons and daughters of our employees participated in the activities that the company organized for them, celebrating special dates such as Halloween, Children's Day, New Year's Eve, and birthdays. Likewise, at Christmas the company gave a gift to each of them.

Sports & Health

- In 2024, 3.36% of all our employees enjoyed maternity or paternity leave. 75% of the employees who took leave were men, returned to work at the end of the leave and are still linked to the company; 25% were women, who by the end of the year are still on leave.
- With the aim of promoting healthy competition, fun and healthy lifestyles in our employees, the company launched, together with other entities of the group, the "Back to the podium" program, sports and non-sports competitions that strengthen physical and mental health, achieving the participation of 36.97% of the Holding's employees. During 2024, our collaborators participated in the following disciplines: Mini shuffleboard, frog, story, cooking, among others.
- To boost well-being and promote healthy habits with sports, the company supported 20.17% of our employees to participate in the "MMB: Bogota Half Marathon". Before the

race, each participant was evaluated by a sports doctor and made recommendations for their preparation. 50% of the participants were men and 50% were women.

- Through employee funds, 35.29% of employees have access to different agreements and benefits for themselves and their families: gym, health plans, dental aids, educational aids and others.
- Through the compensation fund, 24.37% of them conduct sports and recreational activities, among the most used are: swimming, physical conditioning, soccer, spa. In addition, the employee's family also has access to these and other activities.

Work-life balance

- The weekly working day established for the company is 40 hours, that is, a day less than the 46 hours established by Colombian legislation for 2024.
- With the aim of promoting the well-being of employees and contributing to the reduction of greenhouse gases, 100% of employees worked from home 2 days a year. Additionally, 42.86% maintain a hybrid work scheme and can work one day of the week from home.
- Thinking about the well-being of employees and their families, by the end of the year, 100% enjoyed 2.5 business days as a gift from the company.
- To promote employee rest, 100% have the possibility of agreeing with their leaders on the vacation dates they want to enjoy during the year. On average, each employee enjoyed 12.4 days of vacation and during the days of rest, the company ensures the payment of the usual salary.
- 19.3% of our employees manage vehicle or home loans with preferential rates and in other additional lines of credit, 23.5% enjoy differential rates.
- 59.6% of our employees enjoy free parking for vehicles, motorcycles or bicycles.
- During the month of December, 42.02% of our employees participated in a volunteer program that consisted of making market donations to the María es mi Madre soup kitchen and/or accompanying the lunch service for the elderly who visit the place.

Parental Leave

In 2024, 3.36% of Grupo Aval's total employees enjoyed maternity or paternity leave. Of this group, 75% corresponded to male employees, who returned to work at the end of the leave and are currently linked to the company. The remaining 25% were women, who by the end of the year continued to enjoy their leave.

Additionally, as part of the extralegal benefits granted by the company, the extension of the maternity or paternity leave granted by law by five (5) business days was implemented. During these days of extended leave, the company ensures the payment of the usual salary. Additionally, employees who have recently become parents are allowed a staggered return to their work activities, offering them the possibility of working from home two days a week for a period of up to six months after the arrival of their son or daughter.

We also have cozy breastfeeding rooms, designed to provide comfort, privacy and well-being for our collaborators and visitors at this important stage.

These initiatives reaffirm our commitment to health, care and work-life balance, promoting an environment of support and flexibility for families within Grupo Aval.

In addition to these benefits, Grupo Aval Holding has implemented various opportunities for work flexibility:

- Half a day off per month for personal reasons, including errands, moving, or even time with pets.
- One day off during the birthday month.
- Graduation celebrations for employees, spouses, and children.
- Up to three days for emergencies.
- Special three-day leave for marriage.

These initiatives reinforce the supportive, caring, and flexible environment for families within Grupo Aval, promoting healthy lifestyles and a positive work experience, and ensuring that employee well-being remains a strategic focus of our social management.

Comprehensive support for the family

At Grupo Aval, we actively promote the work-life balance of our employees, and a clear example of this is the initiative of our bank Banco de Bogotá. Since 2023, Banco de Bogotá has had CoBaby BdB, a physical space dedicated to collaborating parents with children between 0 and 5 years old. This space offers professional accompaniment in children's pedagogy, providing a safe and stimulating environment that allows employees to work close to their children.

This initiative strengthens our commitment to inclusion and family well-being, generating a positive impact on the quality of life of our employees and their families. During the last period, the benefited children enjoyed almost 4,000 hours in CoBaby, reaching an eNPS of 90 points, evidence of the high level of satisfaction and value that this program represents for our teams.

3.3.8 Performance appraisal

The performance evaluation at Grupo Aval is a structured and strategic process that allows aligning organizational expectations with the individual and collective development of employees. This mechanism is essential to strengthen the culture of high performance, promote meritocracy and guarantee transparency in talent management.

- Throughout each annual cycle, the evaluation process is supported by a technological platform that ensures traceability, standardization and confidentiality of information. The assessment includes both the results of the team, through the transversal organizational

objectives for all employees, and the management by objectives of the position, the area and the strategy of the company. In addition, the assessment of competencies is included where skills and behaviors that are drivers of performance are evaluated. Competencies include attitudes towards work, judgment, initiative, creativity, compliance with organizational policies, leadership and responsibility, occupational safety and health (SG-SST), among others.

Throughout the year, we complement this practice with a dynamic model of agile conversations, characterized by constant dialogue, brief, spontaneous and frequent spaces during the year, which allow close monitoring, recognition of achievements, early identification of opportunities for improvement and rapid adaptation to changes or new priorities.

At our entities, a robust and systematic performance evaluation model is applied, integrating both traditional and innovative tools in the annual process. This ensures that **over 94% of employees** are assessed in terms of goal management, a multidimensional model (360° evaluation and competency-based feedback), and team performance. Through these practices, Grupo Aval consolidates a **flexible, multidimensional performance management approach** focused on strategic alignment, continuous improvement, and strengthening human potential, ensuring high standards of meritocracy and providing key insights to the ESG talent and leadership strategy.

Additionally, every year, Grupo Aval hosts #YoSoyAval day, a space dedicated to celebrating and recognizing the commitment of thousands of collaborators to achieving organizational goals. In 2024, employees played an active role by nominating their colleagues who stood out in key categories reflecting our values: empathy and connection, collaboration and teamwork, customer-centered innovation, sustainability and social impact, efficient management of natural resources, commitment to climate change and biodiversity preservation. Subsequently, 40 winners of the #YoSoyAval awards were selected, thereby strengthening the sense of community, belonging, and teamwork that drives Grupo Aval's sustainable success.

3.3.9 Job climate and satisfaction

In 2025, we conducted the ****Great Place To Work (GPTW)****^{*1} assessment for Grupo Aval Holding, using the **Trust Index** methodology, and were certified by the institute for the period from July 2025 to July 2026. This evaluation allowed us to measure **employee satisfaction** through the direct perception of our collaborators. We are proud to report a **91% participation rate** of our employees in this assessment, with **80% affirming that the company is an excellent place to work**, reflecting high job satisfaction and surpassing the established target of 79%.

Additionally, this survey, through the statements defined by the GPTW institute, allows us to monitor other metrics against which we reaffirm our commitment, analysis and contribution. Below are the results of some statements and the associated aspects for follow-up:

| GPTW Claim | % employees | Associated Aspect | | | | |
|--|-------------|-------------------|-----------|---------|--------------|------|
| | | Stress | Happiness | Purpose | Satisfaction | Team |
| Here people are treated equally regardless of their sexual orientation | 94% | x | x | x | x | x |
| This is a physically safe place to work | 94% | x | x | | x | |
| I feel proud when I see what we achieved | 94% | | x | x | x | x |
| My work is conducted honestly and ethically | 94% | x | x | x | x | x |
| Here people are treated equally regardless of their race | 92% | x | x | x | x | x |
| I feel proud when I say that I work in this organization | 91% | x | x | x | x | x |
| I feel good about the way we contribute to the community | 88% | | x | x | x | x |
| They give me the resources and equipment I need for my work | 87% | x | | | x | |
| I can be myself in my workplace | 80% | x | x | x | x | x |
| I want to work here for a long time | 80% | x | x | x | x | x |
| All things considered, I'd say this is a great place to work | 80% | | | | x | x |

3.4.2 Occupational Health and Safety Management System SG-SST

Grupo Aval holding has an Occupational Health and Safety Management System (OH&S-MS), implemented in accordance with the legal requirements in force in Colombia, especially those contained in resolution 312 of 2019 and Decree 1072 of 2015, which establish the regulatory framework for the prevention of occupational risks in the country.

The main objective of the institutional occupational health and safety policy, approved by Grupo Aval's Board of Directors, is to guarantee safe and healthy work environments not only for its employees, but also for suppliers, contractors, visitors and third parties who carry out activities within its facilities. To this end, the OH&S Management System has the technical, human and financial resources necessary to conduct a structured work plan, which includes the identification

and management of risks to minimize accidents and protect the physical and mental integrity of all the people involved.

The scope of the SG-SST covers 100% of employees, regardless of their level or position, as well as all suppliers, contractors and visitors at the facilities of the Grupo Aval.

In compliance with international best practices and standards, this system has been subject to independent external audits by firms specializing in occupational health and risk management. The most recent audit was conducted in November 2024 by *Smart Solutions Technologies SAS*, verifying rigorous compliance with all elements of the OH&S Management System in accordance with the criteria established in Decree 1072 of 2015 and Resolution 312 of 2019.

It should be noted that Colombian standards for occupational health and safety management have been aligned for several years with the international requirements and guidelines promoted by the International Labor Organization (ILO), the United Nations Environment Program (UNEP) and other guarantor agencies. This regulatory harmonization guarantees the adoption of an approach based on the systematic identification of risks, the active participation of workers, preventive management and continuous improvement, which translates into tangible benefits in the reduction of occupational accidents, occupational diseases and in the strengthening of the integral well-being of human talent. The Ministry of Labor, through its inspection entities, is responsible for the supervision and monitoring of the proper implementation of the OH&S Management System in Colombia, ensuring compliance with regulations in both the public and private sectors, with emphasis on technical compliance and the effectiveness of protection measures at all organizational levels.

The following are the main activities conducted in the field of Occupational Health and Safety during the year 2024:

Emerging risks, possible impacts and measures taken

Activities conducted for the identification of hazards and risk assessments:

| Activity | Number of activities conducted |
|---|--|
| Periodic inspections and self-inspections of workplaces | ARL's ergonomics professionals conducted 56 inspections of our employees' workstations. 8 people conducted their own self-inspection at their workplace. |
| Periodic inspections of common areas | The members of COPASST conducted safety inspections of 47 common areas. |
| Periodic inspections of emergency elements | Our emergency brigade conducted 28 safety inspections of fire extinguishers, first aid kits, evacuation routes, stretchers, fire |

| | |
|---|--|
| | cabinets and other emergency elements existing in Grupo Aval's facilities |
| Corrective, preventive, and improvement actions | Intervention was conducted on 90.3% of the findings evidenced in the inspections of locatives, workplaces and emergency elements. |

Hazard identification, risk assessment, and incident investigation

1. Grupo Aval's Occupational Health and Safety Management System (OH&S-MS) has a structured procedure for hazard identification and risk assessment, through which the necessary controls are determined to minimize, replace or eliminate the sources that generate these hazards. In addition, various communication channels have been set up so that both collaborators and contractors, as well as members of the SG-SST, can report any risk situation detected.

Email:

- Joint Committee on Safety and Health at Work (COPASST): copasst@grupoaval.com
 - Emergency Brigade: BrigadaAval@grupoaval.com
 - Labor Coexistence Committee: convivencialaboral@grupoaval.com
 - Heads of the OHS-MS: awilches@grupoaval.com; latara@grupoaval.com; ltarazona@grupoaval.com
 - OH&S Management System on the intranet: [Occupational Health and Safety Management System - Home](#)
2. Grupo Aval has specific policies that establish guidelines to prevent any discriminatory or harassing behavior, as well as to protect those who report these situations, including:
 - Code of ethics and conduct.
 - Labor coexistence policy.
 - Diversity and inclusion policy.
 - Work disconnection policy.
 - Sexual harassment prevention policy.
 3. During the period evaluated, there have been no cases in which any employee has expressed an intention to leave for reasons related to effects on their physical or mental health derived from their work.
 4. The team responsible for the OH&S Management System is made up of professionals with the training and experience required to perform the system's functions, including:

- Senior management representative, in charge of control and decision-making activities.
 - Responsible for the OH&S Management System, with a valid occupational health and safety license, in charge of the coordination and execution of the system.
 - Members of the SG-SST committees: 11 brigade members, 8 members of COPASST and 6 members of the Labor Coexistence Committee.
5. The findings identified in periodic inspections and reports made by collaborators are socialized with COPASST, which assigns those responsible to intervene in the detected hazards through corrective and preventive actions, improvement plans and lessons learned.
- The results of these processes are documented in the hazard matrix, which forms an integral part of the annual work plan and forms the basis for the continuous improvement of the OH&S MS.
6. To date, no new risks other than those already contemplated in the current hazard matrix have been identified, the main elements and mitigation measures of which are summarized in the attached table:

| Hazard Classification | Possible impacts | Measures taken |
|--|--|---|
| Biomechanics: Prolonged postures, repetitive movements | Musculoskeletal system alterations (fractures, sprains, lumbagos) | Active breaks |
| | | Ergonomics training by job |
| | | Medical exams with a skeletal emphasis |
| Physical: Lighting | Visual system alterations, visual fatigue, headaches | Visual Active Pauses |
| | | Periodic visiometry examinations with the respective recommendations |
| Biologicals: Viruses | Respiratory infections, human losses | Training and re-inductions, reinforcing the emphasis on self-care. |
| | | Provision of protective elements: gel, masks, towels, alcohol, among others. |
| | | Procedure for reporting and monitoring suspected and/or confirmed cases |
| Psychosocial: Task Conditions | Effects derived from stress: Anxiety, depression, insomnia, among others | Wellness activities |
| | | Cognitive active breaks |
| | | Mental health communication pieces |
| | | Practical workshops on meditation, conscious breathing techniques and relaxation. |
| Safety conditions: Technological | | Safety Inspections |

| | | |
|--|---|---------------------------------------|
| | Electrical contacts, short circuits, fire outbreaks | Signage |
| | | Campaigns for order and cleanliness |
| | Material and/or human losses | Corrective and preventive maintenance |
| | | Periodic inspections of common areas |

Occupational Health Services

The following are the health services in which the employees participated during the year 2024:

| Periodic reviews | # patients | % |
|--|------------|-----|
| Visiometry | 105 | 88% |
| Electrocardiogram | 107 | 90% |
| Glycemia | 110 | 92% |
| Lipid profile | 110 | 92% |
| Occupational examination with musculoskeletal emphasis | 110 | 92% |

| Specialized exams | (population that applies to the exam by age, occupation and/or sports activity) | |
|---|---|------|
| | # Patients | % |
| Bilateral mammogram | 23 | 85% |
| Sports Medicine Assessment – Sports Pre-participation | 24 | 100% |
| Electrocardiogram – Sports pre-participation | 24 | 100% |
| Audiometry | 5 | 83% |
| Spirometry | 2 | 67% |

Both periodic and specialized occupational examinations are conducted annually through a Health Service Provider Institution (IPS) specialized in occupational safety and health. This IPS guarantees compliance with confidentiality clauses and the protection of employees' personal data.

All people who undergo occupational examinations sign an informed consent with the IPS for the use and processing of their personal data. Subsequently, the IPS socializes with those responsible for the SG-SST of Grupo Aval the sociodemographic and health conditions report, in which the intervention recommendations based on the main findings are described.

The costs of these health services are assumed in full by Grupo Aval, and coverage is extended to all people linked by an employment contract with the company.

Worker participation, consultation and communication on occupational health and safety:

- Occupational health and safety activities are disseminated through communications and calls that invite participation in the activities contemplated in the training plan and program.
- Employees have information channels, such as emails and telephone lines, to make inquiries or report issues related to safety and health at work, including incidents, accidents, unsafe conditions and suggestions.
- The induction processes for new hires, as well as the annual inductions for employees and the contractor population, include complete information on corporate policy, objectives, responsibilities, reporting mechanisms and other relevant aspects of occupational health and safety.

Below are the main activities conducted during 2024 that encouraged participation in the SG-SST.

| Activity | # Activities Year 2024 |
|---|------------------------|
| Inspections and self-inspections of workplaces | 64 |
| Delivery of ergonomic elements for adaptation to workstations | 33 |
| Days of active breaks, practical stress management workshops, ARL talks on mental health | 19 |
| Activities promoted by the committees of our Management System (COPASST, Emergency Brigade and Labor Coexistence Committee) | 6 |
| Occupational exams, specialized exams and sports pre-participation | 3 |

During 2024, 23 communications on occupational health and safety were issued to Grupo Aval employees. In these communications, the roles and responsibilities of the members of the committees, the procedures in case of emergency, information on preventive maintenance and invitations to participate in training and activities related to safety and health at work were socialized, among other topics.

The responsibilities regarding the OHS-MS were communicated to 100% of the employees so that they can be considered as a factor within the annual performance evaluation.

Regarding the documentation that supports the SG-SST, at the end of 2024 there were 47 documents, including policies, procedures, annexes and formats. During the same year, 14

updates were made to this documentation, in collaboration with the Organization and Methods (O&M) area, which were duly disseminated among the collaborators.

| Document created/updated | Date of publication / update |
|--|------------------------------|
| Emergency Prevention, Preparedness, and Response Plan | 29/04/2024 |
| Matrix of legal requirements for suppliers | 29/05/2024 |
| Update of the form for filing complaints for workplace harassment | 29/05/2024 |
| Supplier OSH Verification and Evaluation Format | 12/06/2024 |
| Processing of complaints for workplace harassment | 7/11/2024 |
| Work disconnection policy | 18/11/2024 |
| Sexual Harassment Prevention Policy | 18/11/2024 |
| Labor coexistence policy | 18/11/2024 |
| Policy for the prevention of the consumption of alcohol, psychoactive substances and tobacco | 18/11/2024 |
| Occupational health and safety policy | 18/11/2024 |

Training of workers in occupational health and safety

Below are the training courses that have been conducted in the company on occupational health and safety issues during the year 2024:

| Topic of OSH training | Duration (hours) | # Participants |
|--|------------------|----------------|
| Theoretical and practical training in Occupational Health and Safety (workshops on healthy lifestyles and work, active breaks, cognitive breaks, talks on mental health, among others) | 29,46 | 126 |
| Induction on the Occupational Health and Safety Management System (OH&S-MS) | 21 | 21 |
| Training aimed at the members of the SG-SST (Copasst, Brigade, Coexistence Committee) | 41 | 25 |

| | | |
|------------------------|---------------|------------|
| Course 50 hours SG-SST | 150 | 3 |
| TOTAL | 241,46 | 175 |

In the annual induction and re-induction processes aimed at Grupo Aval employees and contractors, the most relevant issues related to occupational health and safety are socialized, including the policies that make up the OH&S MS, the responsibilities of employees and contractors in the system, the objectives of the OH&S Management System, the integration and functions of the corresponding committees, the procedures to be followed in the event of an accident or incident, the mechanisms for reporting unsafe acts and conditions, as well as potential emergencies in Grupo Aval and the protocols established for their management.

The training aimed at the members of the SG-SST aims to strengthen their specific knowledge in occupational health and safety, addressing specialized topics for each committee, such as first aid, emergency management, fire control, reporting and investigation of accidents and incidents at work, and legislation related to psychosocial risks, among others. These training courses are given by professionals from the Occupational Risk Administrator (ARL), by the brigade chiefs of the building and by the committees that are part of the SG-SST of Grupo Aval.

Promoting workers' health

The call addressed to employees to participate in activities to promote safety and health at work is made through the internal communication mechanisms of the organization, with participation in these activities being voluntary.

Access to health services is facilitated through exams that employees can take at the company's facilities or at the premises of the Service Provider Institution (IPS). This practice is conducted annually during the month of October, designated as the month of health in the organization, in which additional exams are also offered to those required by current regulations. These include, in addition to the periodic occupational examination, tests such as visionometry, electrocardiograms and clinical analyses, as well as specialized examinations aimed at specific groups, such as bilateral mammograms for women over 40 years of age, spirometry, audiometry and sports medical assessments prior to participation in sports activities.

Additionally, employees have access to preferential rates for prepaid medicine services, optical aids, dental and medications through employee funds and current agreements. Likewise, through agreements with the employee funds and the compensation fund, employees can enjoy activities that promote healthy lifestyles and well-being, such as access to gyms, courses, yoga classes, and various recreational and sports activities.

In line with the promotion of mental health and the promotion of healthy lifestyles, during 2024 joint activities were developed between the well-being and occupational health and safety programs,

addressing topics such as emotion management, stress control, breathing and relaxation techniques, massage sessions, music therapy, aromatherapy, self-massage, and active breaks and meditation sessions.

Jobs covered by an occupational health and safety management system

At Grupo Aval, the Occupational Health and Safety Management System (OH&S and Safety Management System) cover 100% of the positions and position levels within the organization. In addition, its scope extends to contractors, subcontractors, and visitors. Both the annual work plan and the training program include activities aimed at all stakeholders, ensuring compliance with the minimum legal standards in occupational safety and health during all phases of the PHVA (Plan, Do, Verify and Act) cycle.

100% of the people who work for Grupo Aval are covered from the first day of joining the general social security and occupational risks system, and receive the induction process on the SG-SST, its responsibilities, corporate policies and the activities carried out, in order to encourage their participation throughout their career in the company.

The organization's suppliers are selected through a rigorous process that evaluates compliance with the implementation of the SG-SST in each contractor company, and their coverage in social security and occupational risks is verified for all workers who are not collaborators, but carry out activities within Grupo Aval's facilities. Likewise, the activities conducted by these contractors in the company's facilities are subject to verification through pre-, concurrent and post-execution processes, ensuring compliance with occupational health and safety requirements. This process includes, among other aspects, the review of social security and occupational risk coverage, the proper use of personal protection elements, and the successful completion of the activity without the occurrence of incidents or accidents.

Likewise, the outsourcing personnel who carry out work at Grupo Aval's facilities are covered by the SG-SST, and their compliance with health and safety standards is periodically verified, in addition to participating in the activities contemplated in the work plan.

| Outsourcing collaborators and the OH&S Management System | Unit of Measure | 2021 | 2022 | 2023 | 2024 |
|--|-----------------|------|------|------|------|
| Number of outsourcing collaborators | # | 5 | 5 | 5 | 5 |
| Total employees | # | 126 | 123 | 119 | 119 |
| Percentage of outsourcing employees covered | % | 100 | 100 | 100 | 100 |

Workplace Accident Injuries, Occupational Diseases and Diseases

Indicators of injuries due to workplace accidents that occurred in the company during the last five years:

| Lessons for workplace accidents | Unit of Measure | 2022 | | 2023 | | 2024 | |
|---|-----------------|---------------|-------------|---------------|-------------|---------------|-------------|
| | | Collaborators | Contractors | Collaborators | Contractors | Collaborators | Contractors |
| Number of Deaths from a Workplace Accident Injury | # | 0 | 0 | 0 | 0 | 0 | 0 |
| Death rate from a workplace accident injury | % | 0 | 0 | 0 | 0 | 0 | 0 |
| Number of Workplace Injuries with Major Consequences | # | 0 | 0 | 0 | 0 | 0 | 0 |
| Rate of injuries due to occupational accidents with great consequence | % | 0 | 0 | 0 | 0 | 0 | 0 |
| Number of Recordable Workplace Injuries | # | 0 | 1 | 0 | 1 | 0 | 0 |
| Recordable Workplace Injury Rate | % | 0 | 0,56 | 0 | 0,56 | 0 | 0 |

During 2024, there were no accidents or incidents at work in the company. There were also no reports of accidents by the contractors.

| Events during 2024 | Collaborators | Contractors |
|---|---------------|-------------|
| # Cases of work-related diseases | 0 | 0 |
| # Work accidents that have occurred | 0 | 0 |
| # Work incidents without disabling injuries | 0 | 0 |

The evolution of absenteeism in employees due to medical reasons in the last 3 years is as follows:

| Year | Working days of disability | Absenteeism rate | Variation | Goal | % Men | % Women |
|------|----------------------------|------------------|-----------|------|-------|---------|
| 2022 | 344 | 1,17 | | 1,5 | 35% | 65% |
| 2023 | 378 | 1,32 | 14% | 1,5 | 75% | 25% |

| | | | | | | |
|------|-----|-----|------|-----|-----|-----|
| 2024 | 269 | 0,9 | -32% | 1,5 | 39% | 61% |
|------|-----|-----|------|-----|-----|-----|

To calculate the rate of absenteeism due to occupational disease, the number of working days lost due to medical disabilities related to an illness is considered. This calculation excludes days corresponding to vacations, maternity or paternity leave, as well as other paid leave such as mourning or voting. The formula used is as follows: Absenteeism rate = [Total number of days of disability / Number of direct collaborators (indefinite and permanent contracts) / Working days of the year] × 100.

Absenteeism by affected system during the last 3 years

The body systems most affected by these diseases, in order of incidence, were the musculoskeletal system, the respiratory system, and the digestive system, which together accounted for 63.94% of the total number of disabilities recorded.

| Affected System | 2022 | 2023 | 2024 |
|--|--------|--------|--------|
| Musculoskeletal | 45,20% | 38,40% | 25,65% |
| Respiratory | 46,40% | 9,00% | 23,05% |
| Digestive | 8,50% | 9,30% | 15,24% |
| Other (reproductive, circulatory, urinary, visual, procedural, among others) | 45,60% | 43,30% | 36,06% |

Of the 56 workplace inspections conducted, painful symptoms were reported in 10 cases, representing 17.8% of the total. For these cases, ergonomic recommendations were issued during follow-up processes, resulting in 30% of them being closed due to improvement in symptoms. The remaining cases will continue to be monitored ergonomically through 2025 to verify compliance with the recommendations and assess the progress of reported symptoms.