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1. PROCESS

SUPPORT – SG-SST

2. OBJECTIVE

The objective of this policy is to prevent behaviors that may constitute workplace harassment and to establish general guidelines for action in those situations where this type of behavior occurs, complying with current regulations.

In this sense, Grupo Aval Acciones Y Valores S.A, hereinafter Grupo Aval, will establish mechanisms to prevent workplace harassment behaviors, aimed at generating collective awareness of coexistence, promoting work under dignified and fair conditions, fostering harmony among those who share the corporate work environment, ensuring a positive workplace climate, and protecting the privacy, dignity, mental health, and freedom of individuals at work.

Therefore, Grupo Aval and all individuals linked to Grupo Aval under an employment contract are committed to the prevention and mitigation of workplace harassment in all its forms. The Company will therefore ensure the implementation of the procedure for preventing workplace harassment, as established in the Internal Work Regulations, and will provide timely handling of complaints related to workplace harassment through the Workplace Harmony Committee, in accordance with this document, Law 1010 of 2006, Resolutions No. 652 and 1356 of 2012, Resolution 2646 of 2008, and Circular 26 of 2023.

Consequently, the following rules are established for the operation of the Workplace Harmony Committee, as the primary mechanism for the prevention and mitigation of behaviors allegedly constituting workplace harassment.

3. SCOPE

This policy applies to all individuals linked to Grupo Aval through an employment contract.

4. GENERAL GUIDELINES

Given the importance of establishing mechanisms to prevent workplace harassment, Grupo Aval maintains an Occupational Health and Safety Management System designed to promote the physical, mental, and social well-being of individuals employed by Grupo Aval, reaffirming its commitment to guarantee dignified and fair working conditions, harmony among colleagues, and a healthy work environment.

To this end, it is essential to maintain sound labor relations, based on mutual respect, social support, and fair treatment.

Therefore, and in order to prevent any behavior constituting workplace harassment as described in Colombian regulations, the Company establishes the following actions:

- Manage the Workplace Harmony Committee whenever alleged workplace harassment conduct arises.

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- Inform employees about the mechanisms and procedures defined by the Workplace Harmony Committee for filing workplace harassment complaints.
- Continue support and training programs on conflict management, assertive communication, interpersonal relationships, and behaviors that foster healthy coexistence in the workplace.
- Continue managing psychosocial risk factors that may affect workplace relationships.
- Carry out, when applicable, the procedure set forth in the Internal Work Regulations and Law 1010 of 2006.

4.1 Objective of the Workplace Harmony Committee

The purpose of the Workplace Harmony Committee is to receive and assess complaints or potential situations of workplace harassment occurring within the Company, recommend corrective measures to address such behaviors, and monitor compliance with preventive measures, with the objective of promoting dignified and fair working conditions, harmony, and a positive work environment for all employees of Grupo Aval.

4.2 Term of Office of the Workplace Harmony Committee

The term of office for members of the Workplace Harmony Committee shall be two (2) years, starting from the date of its formation, counted from the date of communication of the election and/or appointment.

The Company shall timely carry out the procedures for electing new members to always guarantee the continuity and proper composition of the Committee.

This shall be without prejudice to the requirement that newly elected members begin their activities only upon conclusion of the term of the outgoing committee.

4.3 Functions of the Workplace Harmony Committee

To fulfill its objectives, the Workplace Harmony Committee shall perform the following duties:

- Receive and process complaints describing situations that may constitute workplace harassment.
- Confidentially review the cases outlined in the complaints.
- Hear from the parties involved individually.
- Hold meetings to create a space for dialogue between the parties involved.
- Develop a mutually agreed improvement plan, ensuring confidentiality at all times.
- Monitor compliance with the commitments agreed upon by the parties involved, verifying their fulfillment.

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- In cases where no agreement is reached, recommendations are not followed, or the conduct persists, the Workplace Harmony Committee shall refer the complaint to the Administrative and Human Talent Management Department, which will mediate the situation. If unresolved, the worker will be advised to continue the process before the labor inspector.
- Present recommendations for the effective development of preventive and corrective measures against workplace harassment, as well as the annual report of the committee's activities and any reports required by supervisory bodies.
- Monitor compliance with the Committee's recommendations.
- Prepare quarterly reports on the Committee's management, including complaint statistics, case follow-up, and recommendations.

4.4 Meetings

The Workplace Harmony Committee shall meet regularly once (1) every three months, with quorum being a simple majority of its members. It may also hold extraordinary meetings when cases arise that require immediate intervention, and such meetings may be convened by any member of the Committee.

Decisions shall be made by a simple majority vote, and written minutes signed by participants shall be kept for all meetings.

If Committee members consider it necessary to hold additional meetings beyond the regular schedule, or urgent cases arise, extraordinary sessions shall be convened, which may be called by any member.

4.5 President of the Workplace Harmony Committee

The Workplace Harmony Committee shall elect, by mutual agreement among its members, the person who will serve as Chair, with the following responsibilities:

1. Call Committee members to regular and extraordinary meetings.
2. Lead and guide regular and extraordinary meetings in a dynamic and effective manner.
3. Submit to Company management the recommendations approved by the Committee.
4. Request from the Administrative and Human Talent Management Department the resources required for the functioning of the Committee.

4.6 Secretariat of the Workplace Harmony Committee

The Workplace Harmony Committee shall elect, by mutual agreement, one of its members to serve as Secretary, with the following responsibilities:

1. Receive and process written complaints describing situations that may constitute workplace harassment, including supporting evidence.
2. Send physical or electronic invitations for regular and extraordinary meetings, indicating the date, time, and location of the meeting.
3. Individually summon the parties involved in the complaints to hear their accounts of the events.

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4. Jointly summon the parties involved to establish commitments for coexistence.
5. Maintain the file of submitted complaints, supporting documentation, and ensure the reservation, custody, and confidentiality of the information.
6. Prepare the agenda and minutes for each Committee meeting.
7. Send communications with the Committee's recommendations to the various departments of the Company.
8. Schedule meetings and request supporting documentation necessary to monitor compliance with commitments made by each party.
9. Prepare quarterly reports on the Committee's management, including complaint statistics, case monitoring, and recommendations, which shall be submitted to the Administrative and Human Talent Management Department and the SGSST officer.

All members of the organization shall promote the elimination of any form of discrimination, violence, harassment, coercion, or any behavior that may constitute workplace harassment, as defined by Law 1010 of 2006.

Failure to comply with this policy constitutes a serious offense. Consequently, the Company may adopt corresponding disciplinary measures, including termination of the employment contract with just cause, in accordance with the Internal Work Regulations, the employment contract, and the Colombian Labor Code.

CHANGE CONTROL

DATE	VERSION	REASON FOR THE CHANGE
4-09-2020	1	Issuance of the document
17-09-2020	2	Update of Circular 26/2023 guidelines
Nov 2024	3	Review of lawyers and ARL, including implications for compliance with the policy.

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