

1. OBJECTIVE

To establish the general principles and guidelines that complement our Codes of Ethics and ensure a diverse, equitable, inclusive and respectful organizational culture, which values the differences within Grupo Aval Acciones y Valores S.A. (hereinafter "Grupo Aval" or the "Company"), and its subordinate companies (together with the Company), the "Grupo Aval Companies".

2. SCOPE

The Corporate Diversity and Inclusion Policy seeks to establish the general guidelines for Grupo Aval Companies to implement, through their corresponding bodies, the guidelines described in this document for the development of diverse and non-discriminatory environments that benefit all employees and different stakeholders.

3. GENERAL GUIDELINES

3.1 PRINCIPLES

- **Equal treatment, respect for human rights and dignity for people in their diversity**

Our processes and policies must strive to promote equal treatment of all people, regardless of their ethnicity, gender identity, sexual orientation, political or religious affiliation, nationality, disability, age, marital status, socioeconomic situation, among others. Likewise, they must promote dignity and the promotion of an open environment and respect for all people, avoiding any type of discrimination and/or harassment, seeking an inclusive work environment that implies valuing diversity.

- **Discrimination-free environments and equal opportunities**

The Companies of Grupo Aval are committed to the promotion of inclusive practices, spaces and services. In decisions associated with the employment relationship and access to opportunities, the criteria of merit, competencies and professional abilities will always prevail, without any discrimination.

- **Accessibility and progressive reduction of physical, attitudinal and communication barriers**

We promote diverse talent and safe environments, therefore, we will strive to offer spaces and mechanisms that seek the progressive reduction of physical barriers and the implementation of cultural transformation initiatives, encouraging the use of inclusive language in corporate communication, internal or external, and using inclusive language.

- **Work, personal and family life balance of employees**

Grupo Aval Companies recognize the importance of balancing the needs of human talent, promoting flexible, equitable measures and solutions that allow for a balance between work, personal and family life.

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- **Inclusive access to the services of Grupo Aval Companies**

The Companies of Grupo Aval respect and value the diversity of the people to whom our subordinate companies provide their services, which is why we promote equality in the treatment offered by our employees, so that all interested people can request and access products, services, advice or information from our portfolio and always receive respectful, equal treatment and with all the guarantees of transparency by the human team that makes up our organization.

The Companies of Grupo Aval, in accordance with their reality, business projection and context, will strive for the design of programs, products and reasonable adjustments that contribute to the stakeholders defined by each of them.

3.2 SELECTION AND SUCCESSION OF THE BOARD OF DIRECTORS

The selection and succession process of the members of our Board of Directors is strictly based on the capacities, personal and professional skills of its members and is therefore harmonious with this Corporate Policy.

3.3 ENTRY INTO FORCE OF THIS POLICY

This Policy shall enter into force upon its approval by the Board of Directors of Grupo Aval and shall be submitted for consideration and approval by the Boards of Directors of Banks Aval, Porvenir and Corficolombiana for implementation in such entities and in their subordinates.

3.4 IMPLEMENTATION OF THE DIVERSITY AND INCLUSION POLICY

This Diversity and Inclusion policy will be made known to all the stakeholders of the Grupo Aval Companies.

4. GLOSSARY

Below are some basic concepts to understand and appropriate this Corporate Diversity and Inclusion Policy (the "Policy") through an inclusion and diversity approach in all the processes and procedures of Grupo Aval and the Group Companies.

1. **Accessibility:** condition that spaces, environments, products and services must meet, so that they can be used by all people, facilitating their interaction in a simple and comfortable way.
2. **Reasonable Accommodations:** those provisions adopted in order to adapt the environment, goods, products and services to specific personal situations that, for different reasons, are in a special situation.
3. **Physical barriers:** all those obstacles and physical obstacles that limit or prevent the freedom of movement or normal movement of people.
4. **Disability: disability** is a concept that relates the sensory, physical, cognitive, intellectual, psychosocial and/or multiple differences that a person may have. This is articulated with the physical,

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attitudinal and communication barriers that limit their participation and access to different areas or contexts (work, social, economic, among others).

5. **Discrimination:** are the actions or omissions that exclude, violate or affect in any way (physical, psychological, structural, among other forms of violence) a person because of their sexual orientation, gender identity, ethnicity, age, disability, place of origin, class or other marker of difference.
6. **Diversity:** refers to the multiple ways of being that characterize the groups and societies that make up humanity, it is manifested in the plurality of identity, social, cultural, ethnic, religious particularities, among others, that define each person and give added value to society.
7. **Gender Equity:** seeks to provide the same conditions to human beings, without any discrimination based on their gender, recognizing their trajectories, experiences and contributions.
8. **Migratory Status:** it is the condition assigned by the immigration authority for the entry of a person to the receiving country. Human migration can be forced or voluntary; it has to do with the definitive or itinerant change of the place of origin. It can be internal, or from one country to another. Forced migration has to do with situations that affect the quality of life and force displacement. On the other hand, voluntary migration has to do with the search for new economic and/or social opportunities. Migration generates great cultural transformations both for the people who migrate and for the receiving communities, in some situations outbreaks of xenophobia are generated, which is the rejection and/or discrimination against foreigners.
9. **Gender:** category that organizes and hierarchizes social practices, assigning roles in different areas. It serves as a mechanism that marks the differences between people, based on sex as a factor that leads to practices of being and should be between men and women, mainly.
10. **Inclusion:** actions that tend to improve and facilitate the conditions of access to services and the effective enjoyment of rights through free expression, of those people who have been historically excluded. It is expressed through the promotion of positive changes, both collectively and individually.
11. **Intersectionality:** an approach that identifies how the simultaneous intersection between different systems of discrimination and oppression occurs in subjects, demonstrating that forms and experiences of discrimination (based on gender, ethnicity, disability, religion, among others) cannot be explained in isolation.
12. **Inclusive Language:** refers to the use of language in a way that recognizes and integrates diverse population groups, avoiding invisibility and bias towards people with disabilities, belonging to ethnic groups, with diverse sexual orientations and gender identities, and migrants.
13. **Inclusive Language:** it is the one that reflects the recognition of gender and social diversity and seeks to balance inequalities. Inclusive language contributes to forging a society that recognizes and integrates diversity, equality and gender equity.

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14. **Sexual Orientation:** it is the desire and affective or sexual attraction that is felt for another person, either of the same sex or of another.
15. **Ethnic Belonging:** a concept used to identify people as members of one of the legally recognized ethnic groups, ethnic belonging accounts for the cultural and socio-organizational differences of some groups; ethnicity includes the different cultural manifestations of a population taking as a reference their religious, political, organizational, spiritual practices, as well as their worldviews and language.

5. REGULATION

This Corporate Diversity and Inclusion Policy will have as a reference the national and international standards, agreements and best practices applicable to diversity and inclusion in the countries in which the Grupo Aval Companies operate. In addition, as a regulatory framework, it contemplates within its guidelines what is described in the internal policies of each of the Grupo Aval Companies.

CHANGE CONTROL

DATE	VERSION	REASON FOR CHANGE LAST UPDATED
November 2025	2	Modification is made due to change of template and codification of the document. The content approved by the Board of Directors on July 28, 2021 Minutes #373 is maintained.

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