

Grupo Aval Acciones y Valores S.A. (hereinafter, Grupo Aval) is a financial holding company that has established itself as a leader in the financial sector and in other sectors of the economy, offering a wide range of financial services, infrastructure, energy, among others, positively impacting the development and progress of the country.

We are issuers of the local and international stock market, both of stocks and bonds, and we consolidate more than 100 subsidiaries. Our purpose is to promote profitable and sustainable growth in the entities that make up the Group, promoting the care of the environment, the well-being and progress of Colombians, through attractive and innovative offers, under strict corporate governance standards.

Background

At Grupo Aval we recognize the importance of promoting, protecting, respecting and guaranteeing the remediation of human rights. To this end, we have established policies and procedures that ensure the development of our operations under the highest national and international regulatory standards, in coherence with the fundamental rights of our stakeholders.

Our commitment is based on global and local references, among which the following stand out:

- The UN Guiding Principles on Business and Human Rights, which set out the framework of "protect, respect and remedy".
- The International Bill of Human Rights, which includes the Universal Declaration of Human Rights and the International Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights.
- The Political Constitution of Colombia and the International Treaties adopted by the State.

In addition, we have internal instruments that reinforce this commitment, such as:

- The Code of Ethics and Conduct.
- The Diversity and Inclusion Policy.
- The Occupational Health and Safety Management System.
- The Corporate Human Rights Policy updated and approved by our Board of Directors on July 22, 2025.

At Grupo Aval we are pluralistic, equitable and inclusive. We guarantee equal opportunities for all employees, regardless of their gender, sex, sexual orientation, ethnicity, nationality or cultural origin, as the capacity of human talent is recognized for their merits and values, without any discrimination. As of December 31, 2025, Grupo Aval has a diverse and inclusive team, made up of 51% women and 49% men, under the leadership of a woman.

In our Human Rights Policy, we have defined 12 fundamental commitments that guide Grupo Aval's activities and promote respect for human rights towards our employees, suppliers, shareholders and other related third parties. These commitments are as follows:

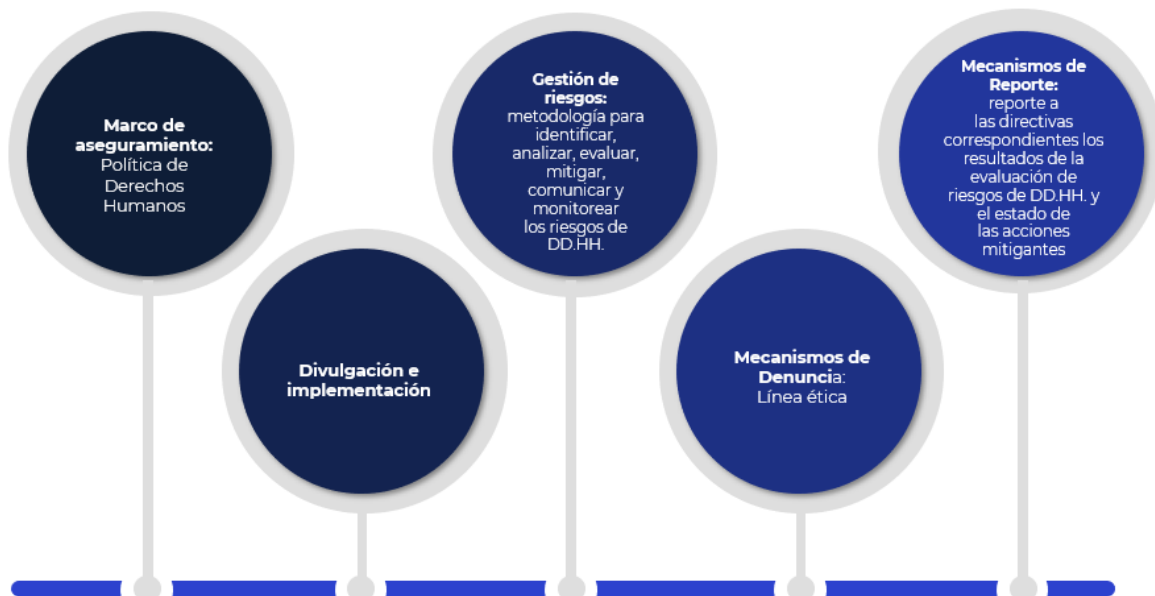
- Respect for and promotion of human rights as a criterion for management and decision-making.
- Rejection of any act that violates or violates human rights. These include, but are not limited to, forced labor, workplace harassment, and human trafficking.
- Absolute respect for the personal dignity of the employee and their beliefs.

- Respect and non-discrimination against people, employees, customers, contractors or suppliers due to differences in sex, gender, gender identity, sexual orientation, ethnic identity, age, religion, disability (physical, sensory, intellectual, mental), social level, hierarchy or any other condition and/or characteristic of their identity.
- Generation of dignified, safe and healthy working conditions.
- Recognition of the right to rest of our employees.
- Rejection of child labor.
- Compliance with current labor legislation.
- Equitable remuneration in accordance with the Law.
- Respect for the right to freedom of association and collective bargaining.
- Recognition of the value of the culture and diversity of the people and territories where we operate.
- Transparency in decision-making, in the management of information and before the community in general.

At Grupo Aval we have created a work environment that respects and promotes human rights, both inside and outside the organization, and this commitment extends to our stakeholders.

Assurance Framework

To ensure compliance with the guidelines and commitments established in our Human Rights Policy, we have structured a due diligence process that integrates actions and principles aimed at continuous strengthening. This process allows us to permanently manage the risks associated with human rights, through the following phases of prevention, evaluation and monitoring:



Human Rights Due Diligence

The methodology for the identification of risks related to human rights in our economic activity is developed in two stages that are described below:

The first stage consists of an analysis of contexts, which takes the following information as a reference:

- Grupo Aval's policies, procedures and commitments.

- The human rights legal framework in which Grupo Aval operates.
- The sector, its risks and challenges in terms of human rights.
- Identification of the population covered: Employees (men and women), suppliers, contractors, shareholders, ethnic communities (Indigenous, Raizales, Black or Afro-Colombian, Palenqueras, Roma or Gypsies), LGBTIQ+ community, migrant workers, people with disabilities, all socioeconomic levels, children and local communities.

Once the context review has been carried out, we proceed to identify the risks and determine possible gaps in management policies, processes and procedures, for this, the responsible area and/or process is assigned. Subsequently, the assessment of the probability and impact of the risks and their causes applicable to Grupo Aval is carried out, in order to establish the inherent risk. This analysis is carried out with the support of the Senior Compliance Department, the Administrative and Human Talent Management and the Sustainability Department.

In the second stage, the existing controls are identified and evaluated to mitigate the risks detected, verifying both their design and their effectiveness, in coordination with those responsible for each control. Likewise, in the event that Grupo Aval carries out an acquisition, merger, joint venture or other investment project, the required due diligence process is activated before the execution of the operation.

Annual Result

We have identified and documented the risks, their causes and the associated controls in the risk-control matrix, based on the context analysis previously carried out. Likewise, the design of the controls incorporated in the matrix was evaluated, in order to ensure adequate mitigation of residual risks and a correct classification of the inherent risk.

The human rights risk-control matrix, as of December 31, 2025, includes three risks with a 'Low' residual rating, sixteen causes, and twenty-one controls that operated effectively. The risks, their causes, and the populations covered by this matrix are presented below:

a. Human and Social Rights Risks:

Risk Reference	Risk	Population Covered
FC-R-01	Failing to comply with the legal framework and/or internal and corporate policies on labor and safety at work.	Collaborators and suppliers who carry out activities at Grupo Aval's facilities.
FC-R-02	Failing to comply with the legal framework and/or internal and corporate policies on equity, diversity, inclusion and workplace harassment.	Employees, suppliers, shareholders, ethnic communities (Indigenous, Raizales, Black or Afro-Colombian, Palenqueras, Roma or Gypsies), LGBTIQ+ community, migrant workers, people with disabilities, all socioeconomic levels and local communities.
FC-R-03	Failing to comply with the legal framework and/or internal and corporate policies on forced labor, child labor, and human rights in general.	Collaborators (men and women), suppliers, children and adolescents.

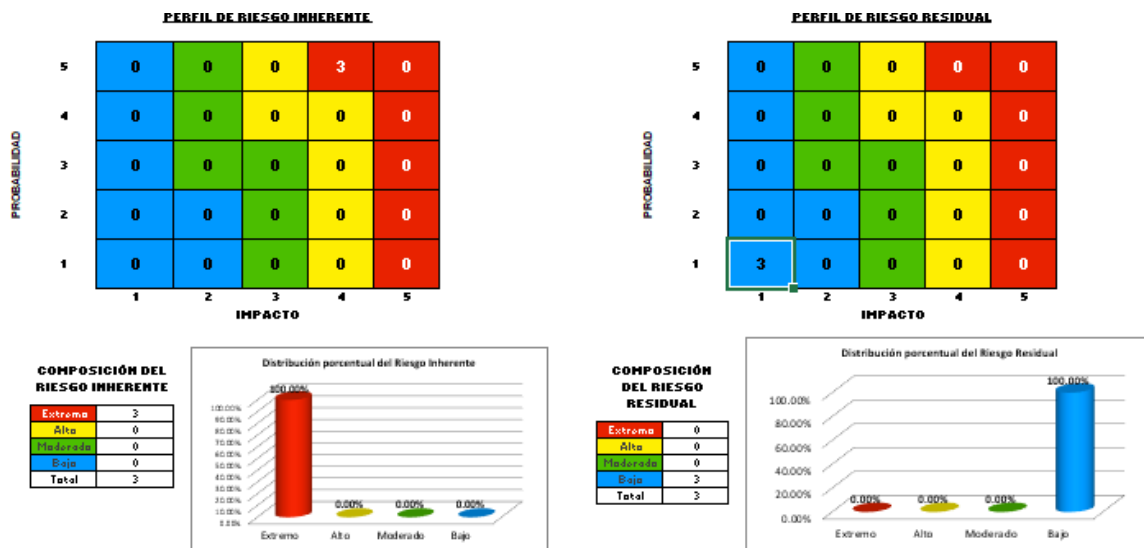
b. Human and Social Rights Causes:

Reference Cause	Causes	Population Covered
C3	Not knowing situations that may affect the physical or psychological integrity of employees, suppliers, shareholders or any related third party.	Collaborators (men and women), contractors, suppliers and shareholders.
C9	Limited access to feedback and open dialogue about professional development.	Collaborators (men and women)
C11	Long working hours that affect the balance between professional and personal life.	
C15	Unequal or discriminatory treatment among workers.	
C2	Lack of training for employees and senior management.	
C4	Non-existence or non-compliance with policies related to taking vacations.	
C5	Organizational culture that normalizes exploitation or abuse of authority.	
C6	Unequal conditions in the functions assigned to employees, assignment of positions or employment or change thereof and/or salaries	
C16	Obstructing free association and/or collective bargaining.	
C10	Violation of the confidentiality of employees' personal information.	
C12	Delay in fulfilling social security responsibilities.	
C13	Gender inequality at management levels and in salaries.	
C14	Inappropriate conduct or harassment at work in the workplace. Inappropriate behavior or sexual harassment in the work environment.	Collaborators (men and women) Collaborators (men and women), contractors, suppliers and shareholders.
C1	Deficient or unfounded domestic policies.	Employees (men and women), suppliers, shareholders, ethnic communities (Indigenous, Raizales, Black or Afro-Colombian, Palenqueras, Roma or Gypsies), LGBTIQ+ community, migrant workers, people with disabilities, all socioeconomic levels and local communities.
C7	Restriction on freedom of opinion, speech or expression.	

C8	Establishing and/or maintaining relationships with suppliers or third parties with inadequate labor practices and/or human rights violations.	Suppliers and contractors.
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c. Results of the Exercise:

The risk heat map as a result of the last exercise is presented below:



All risks, in accordance with the controls implemented, are at a "low" residual risk level.

Reporting Mechanisms

We have established the [Ethics Line](#) as a reporting mechanism so that employees, shareholders, suppliers or third parties can report any complaint or event related to human rights violations. This tool is available on the Grupo Aval website and, for employees, also through the corporate Intranet. Employees are periodically reminded of the existence of this ethics line and it is integrated into the training that employees receive from their annual bonding and training process. During 2025, no complaints or complaints related to human rights violations were received within Grupo Aval.

Action or Mitigation Plans

For the aforementioned risks and causes of Grupo Aval, the following mitigating activities have been defined and executed, which are part of the controls of the risk control matrix:

a. Failure to comply with the regulation of the Occupational Health and Safety Management System - SG-SST and Incidents that may affect personal integrity

At Grupo Aval we have an occupational health and safety management system, which is permanently verified to achieve compliance with its activities. We seek to ensure that the work environment and its conditions are healthy and safe through the implementation of this system, which is endorsed by ARL Seguros de Vida Alfa S.A.

During 2025, we continued with the promotion of issues related to prevention and health promotion to mitigate possible occupational risks. We carried out different activities that

included informative talks, training, active breaks, occupational exams for employees, among other activities that promote healthy lifestyles and work.

b. Discrimination

In order to consolidate our actions with the Corporate Business Inclusion Policy, we have established the following principles:

- ✓ Equal treatment, respect for human rights and dignity for people in their diversity.
- ✓ Discrimination-free environments and equal opportunities.
- ✓ Accessibility and progressive reduction of physical, attitudinal and communication barriers.
- ✓ Work, personal and family life balance of employees.
- ✓ Inclusive access to the services of the Grupo Aval Companies.

These general principles and guidelines complement the Code of Ethics and Conduct and ensure a diverse, equitable, inclusive and respectful organizational culture, which values differences within Grupo Aval.

In addition to the above, we continue to strengthen our commitment to equitable and respectful work environments. As a reflection of this effort, in 2024, we achieved the Friendly Biz recertification of the Chamber of Diversity. This achievement reaffirms our best practices in inclusion and respect for diversity, as we obtained sixth place in the ranking of the 10 most inclusive companies in Latin America, awarded by the Chamber of Diversity and the National Consulting Center.

c. Workplace harassment

At Grupo Aval we maintain our commitment and categorically reject any form of workplace harassment, we continue to promote actions for the prevention, attention and mitigation of this risk, in compliance with Law 1010 of 2006 and other current regulations. We have a Labor Coexistence Committee, made up of bipartite representatives of the company and the workers, in charge of receiving, analyzing

and to process complaints related to conduct or situations of workplace harassment. This committee promotes dialogue, conciliation and effective dispute resolution, guaranteeing confidentiality, respect for due process and the protection of the rights of the parties involved. During 2025, this committee did not receive any complaints, so its management focused on the prevention and promotion of a healthy work environment.

d. Free time and enjoy holidays

One of the principles of our Corporate Diversity and Inclusion Policy is the balance between work, personal and family life of employees, under which we have created emotional benefits that allow people to achieve a better balance between their personal life and work, since they have the possibility of maximizing time with their families, including half a day off per month, flexible hours and hybrid work schemes for some employees. Additionally, we promote the enjoyment of vacations by periodically monitoring the vacation schedule of employees.

e. Restriction on free association, expression and the right to collective bargaining

Restriction or pressure on the right of association is expressly prohibited and supported by Grupo Aval's policies and internal work regulations; to protect this right, we have confidential controls and reporting channels in the event of any sign of violation, guaranteeing compliance with applicable regulations.

f. Child labour, forced labour and human trafficking

We firmly reject child labor, forced labor, and human trafficking, practices prohibited in the policies and regulations of the Organization. Likewise, child labor and forced labor is in the risk control matrix, under the risk "FC-R-03: Failure to comply with the legal framework and/or internal and corporate policies on human rights (forced and child labor)." This is duly covered with controls executed by the corresponding areas of Grupo Aval.

In relation to trafficking in persons, our legal system typifies it in the Penal Code in its article 188A, understood as obtaining economic advantage or any other benefit for oneself or for another person, through the exploitation of children, adolescents, women and men, through the execution of non-consensual activities; at Grupo Aval we comply with the regulatory framework.

g. Inequality in the allocation of salaries, functions, and/or positions

At Grupo Aval, the definition of salaries is based on the merit, skills, performance and trajectory of the people, leaving aside

parameters that may include discriminatory biases. When it comes to 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.

h. Non-compliance with the SG-SST Occupational Health and Safety Management System by suppliers

Grupo Aval has established the Occupational Health and Safety System, fully complying with the work plan defined for 2025 with scope for our employees and contractors. For the execution of a contract or contracted activity at Grupo Aval's facilities by a supplier, compliance with the corresponding safety standards and certifications is verified. In addition to this, the Sustainable Procurement Policy was established, which postulates the sustainability criteria of our purchasing process, which promotes our suppliers to adopt sustainable practices and advance in their economic, environmental and social management.

In relation to subsidiaries, in the last three years, 27 of Grupo Aval's 104 entities have carried out human rights evaluation and due diligence, considering their economic activity, organizational structure and operation. This percentage represents approximately 63% of the Group's 67,585 employees in 2025, a year in which no necessary mitigation actions or materialized risks were identified. Additionally, 84% of the total suppliers contracted by Grupo Aval and its subsidiaries were included in due diligence, without presenting materialized risks that required mitigation actions. In relation to the company ADL LAB, in which Grupo Aval Acciones y Valores S.A. owns a 34% stake but where it does not exercise significant control or influence, we are in the review phase.

In addition, it is confirmed with Banco de Bogotá, Corficolombiana and its subsidiaries, and Banco de Occidente that, during 2025, no events related to the identified human rights risks have materialized. Although there are improvement plans for the programs, no mitigation measures or remediation actions have been implemented on materialized risks. Likewise, for Grupo Aval, no failures in the implemented controls or materialization of risks have been identified

Socialization and Dissemination Actions

In order to strengthen the human rights capacities of Grupo Aval Acciones y Valores S.A.'s employees, during 2025, the following activities were carried out, which are also part of the welfare and training programs related to the occupational health and safety system, diversity, equity

and inclusion, induction of new employees, Endorsement Guidelines and general company training:

Line of action	Activities grouped	Public Objective	Frequency	Scope
Organizational climate and culture	Measurement of work environment (Great Place To Work 2025/2026); Talks on Organizational Happiness (includes 2025 version); Talk "Work together, succeed together"; Workshop "Inspiring Leadership"; Workshop "Reflection and gratitude for end the year."	Collaborators	Annual / Newspaper	Strengthening organizational culture and respectful work environment
Human Rights and Business Ethics	Human Rights Training – Program Endorsement Guidelines (includes ethics, channels, OSH); Conceptualization and value generation workshop for companies that respect human rights; Dissemination of the Human Rights Policy; Annual re-induction of suppliers with a human rights approach; Online mailing Ethics and Code of Ethics.	Collaborators / Suppliers	Annual / Permanent	Integration of Human Rights in Operation chain of supply

Diversity, Equity and Inclusion (DEI)	Conexia Forum (Law 2466 of 2025); WeTrade; Chamber Academic Corporate (8 sessions 2025 About DEI, accessibility, business inclusion, trends 2026); Workshop "You have the power"; Workshop About employment contracts for refugees and migrants; Working Group on Business Inclusion (inter-entities).	Employees / Managers / Institutional representatives	Quarterly / Eventual	Regulatory Update, Labor Inclusion and Sectoral articulation
Prevention of the Harassment and Work coexistence	Talks and workshops "Clear Borders: Prevention of Harassment"; Training for the Coexistence Committee (attention to harassment complaints, psychological first aid).	Collaborators / Coexistence Committee	Newspaper	Prevention, management of Conflicts and safe environments
Occupational Health and Safety (OSH)	Training SG-SST (induction and month of the health); Re-induction	Collaborators / Committees / Suppliers	Annual / Newspaper	Preventive management of Risks

	annual SG-SST suppliers; Talk "Aspects SST with third parties"; Talk "Cultivate" a safe work"; Training a Brigade of Emergencies (first aids, triage, emergencies offices); COPASST Training (ID of dangers, investigation accidents); Periodic active breaks.			Protection of the law to safe working conditions
Mental health and holistic well-being	Workshops and talks on stress management and mental health; First aid psychological; "Unlocks your emotions"; "Disconnect your mind and connect your senses"; "Crisis: opportunity for growth"; "Healing the heart"; "Activate You inner child"; "Transform your life" (both versions).	Collaborators	Newspaper	Protection of psychosocial well-being
Participation in strategic external events	Congress FEST (Finance for Equity, Sustainability and Transformation).	Institutional representatives	Eventual	Positioning and external learning in sustainability and Inclusion

Our Subsidiaries

Our subsidiaries have also implemented policies and procedures related to human rights. For information, the due diligence reports published by some of them are referenced:

- **Banco de Bogotá:**
[derechos-humanos.pdf](#)
- **Banco de Occidente:**
<https://portalpublico.bancodeoccidente.com.co/documents/d/guest/debida-diligencia-en-derechos-humanos>
- **Corficolombiana:**
<https://www.corfi.com/documents/20123/1458853/informe-de-derechos-humanos-corfi.pdf>

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