APPROACH

At Grupo Aval, we define engagement as a strategic, ongoing and two-way process of dialogue, collaboration and influence that, in our role as a holding company, enables us to understand the perspectives of our entities, foster alignment with the corporate strategy, and advance the integration of environmental, social and governance criteria into management and decision-making.

Our model combines collaborative and individual engagement mechanisms, participation in governance bodies, technical support, the definition of common policies and guidelines, indicator-based monitoring, and escalation mechanisms. The depth and scope of engagement are determined by each entity's relevance, the nature of its business, its level of maturity, and the ESG gaps identified.

In 2025, this process contributed to the rollout of Sustainable ROE, the standardization of corporate policies and methodologies, stronger sustainability governance, and the progressive integration of ESG criteria into strategic, lending and investment decisions.

Engagement primarily covered Banco de Bogotá, Banco de Occidente, Banco Popular, Banco AV Villas, Porvenir, Corficolombiana, Aval Fiduciaria, Aval Casa de Bolsa, Aval Banca de Inversión, dale!, and Aval Valor Compartido, among other entities.

STEWARDSHIP POLICY FRAMEWORK AND EXPECTATIONS

Grupo Aval conducts its engagement, stewardship, and oversight activities with its subsidiaries within the framework of its corporate governance system and the policies approved by the Board of Directors and Senior Management. Through these policies, Grupo Aval establishes common principles, responsibilities, objectives, and expectations for the management of environmental, social, and governance (ESG) matters, promoting their progressive integration into strategy, risk management, and decision-making processes across its entities.

Priority topics addressed through this framework include climate change, biodiversity, sustainable finance, human rights, diversity, equity and inclusion, ethics and compliance, risk management, data protection, cybersecurity, and corporate governance.

As part of its stewardship activities, Grupo Aval establishes corporate guidelines and expectations through its Board of Directors, the directors appointed to its subsidiaries, and its Board of Directors Guidelines. Through these mechanisms, Grupo Aval oversees the management of material sustainability and corporate governance matters, promotes the adoption of best practices, and encourages the effective management of risks and opportunities. Progress is monitored on a regular basis through key performance indicators, corporate committees, reporting mechanisms, and ongoing engagement with the management teams and governing bodies of its entities.

When gaps, material risks, or insufficient progress are identified, Grupo Aval undertakes engagement activities to understand the underlying causes, agree on action plans, and monitor the implementation of commitments. Where appropriate, issues may be escalated to corporate committees, Board support committees, or the Board of Directors itself, depending on their materiality and potential impact.

1. COLLABORATIVE ENGAGEMENT

As part of its engagement process, Grupo Aval promotes collective dialogue and coordination forums with its entities to address common challenges, exchange knowledge, establish corporate guidelines and methodologies, and develop joint solutions. These forums help build a shared vision, facilitate the adoption of leading practices, and coordinate cross-cutting initiatives on strategic and ESG matters.

Key results

- More than 400 committee meetings attended by Grupo Aval and its entities.
- 12 sessions of the Sustainability and Diversity, Equity and Inclusion committees.
- More than 25 sessions of the Aval Regulatory Subcommittee, CORE.
- The first Grupo Aval Boards of Directors Meeting, attended by 120 directors.
- Consolidation of corporate committees on sustainability, corporate governance, risk, compliance, talent, customers, regulatory affairs, technology and cybersecurity.
- Definition of objectives, indicators and targets associated with Sustainable ROE.
- Strengthening and harmonization of corporate policies on sustainability, human rights, risk, compliance, data protection and cybersecurity.
- Joint membership in PCAF and progress in integrating climate-related risks.
- Development of a common taxonomy for classifying sustainable finance activities.
- Consolidation of a COP 46.9 trillion sustainable loan portfolio.
- Assessment of 1,046 suppliers against ESG criteria.
- Coordination of cross-cutting initiatives such as Misión La Guajira, Mi Grupo es Aval, #YoSoyAval, the climate strategy, the ESG indicator system, and the rollout of Sustainable ROE.

2. INDIVIDUAL ENGAGEMENT

Individual engagement complements collaborative forums through direct and differentiated support for each entity. Through this process, Grupo Aval reviews performance, recognizes capabilities and levels of progress, identifies gaps, and agrees on actions that reflect the nature of each business, its risks and priorities.

This engagement is conducted through bilateral meetings, participation in boards of directors and committees, maturity assessments, indicator monitoring, and oversight of action plans. This approach supports targeted action, progress assessment, and verifiable improvements in management practices.

Key results

- 25 specialized meetings and technical assistance sessions with the entities, focused on identifying gaps, aligning priorities, and advancing strategic matters such as sustainable finance, climate change, social investment, diversity and inclusion, financial education, CSA performance, and the strengthening of Sustainable ROE.
- 49 specialized meetings to manage credit and concentration risk.
- Definition of targets and implementation of a common ESG indicator system associated with Sustainable ROE for the main entities.

- Individual support on the implementation of Environmental and Social Risk Management Systems (ESRMS), enabling Grupo Aval to recognize entities' different levels of progress and guide specific actions:
- Banco de Bogotá strengthened its ESRMS, conducted 416 assessments covering approximately COP 31 trillion, and incorporated the IFC Performance Standards and the Equator Principles.
- Banco de Occidente assessed 13,394 Corporate Banking transactions through its ESRMS.
- Banco Popular began identifying gaps and designing its environmental and social risk management system.
- Banco AV Villas continued implementing its system for corporate and government-sector clients.
- Corficolombiana integrated climate-related risks into its enterprise risk management model.
- Porvenir advanced climate scenario models for its investment portfolios.
- Monitoring compliance with corporate policies.
- Assessments covering internal control, audit, business continuity, cybersecurity and corporate risks.
- Participation by the entities in the Corporate Sustainability Assessment (CSA).
- Risk and compliance training with average coverage of 93.8% across subsidiaries.

3. EXTERNAL COLLABORATIVE ENGAGEMENT

As a complement to engagement with its entities, Grupo Aval and its companies participate in partnerships, industry initiatives, and dialogue forums with trade associations, international organizations, authorities, communities and other relevant stakeholders. This participation enables knowledge exchange, contributes to the development of common standards, and supports collective responses to environmental, social and governance challenges.

Through these forums, Grupo Aval and its entities strengthen their capabilities, incorporate international benchmarks into their management practices, and contribute to the development of sector-wide and territorial solutions.

Key initiatives

- Grupo Aval and its entities joined PCAF.
- The banks participated in UNEP FI and the Principles for Responsible Banking.
- Porvenir, Corficolombiana and Aval Fiduciaria adhered to the Principles for Responsible Investment.
- Participation in the United Nations Global Compact.
- Participation in Asobancaria's Green Protocol.
- Porvenir's participation in collaborative industry initiatives on climate change.
- Development of Misión La Guajira together with Promigas, Prisa Media, Claro, social organizations, authorities and Wayuu communities.
- The "Nature as an Asset" Forum held jointly with Corficolombiana.
- Forums such as Banco de Occidente's ECOS, which bring together customers, suppliers, civil society organizations and other partners around sustainability practices.

Participation in these initiatives helped strengthen shared methodologies, capabilities and practices, while promoting greater coordination among stakeholders on material issues for the financial sector and its stakeholders.

4. ENGAGEMENT WITH ISSUERS AND INVESTEE COMPANIES

As part of their investment and asset management activities, Porvenir, Corficolombiana, Aval Fiduciaria and other entities continue to integrate ESG criteria into investment analysis, selection and monitoring. This process seeks to understand and manage ESG risks and opportunities associated with issuers and investee companies, and to progressively influence the adoption of leading practices.

The following developments stood out in 2025:

- Porvenir applied ESG criteria to 51.4% of assets under management (AUM).
- Porvenir has a Responsible Investment Policy and conducts climate risk assessments across portions of its investment portfolios.
- Corficolombiana has a Responsible Investment Policy and assesses climate-related risks in the sectors where it concentrates its investments.
- Both Porvenir and Corficolombiana are signatories to the Principles for Responsible Investment (PRI).
- During 2025, Porvenir conducted engagement processes with four portfolio companies, representing 17% of prioritized assets under management. The main topics addressed included the quality of issuers' environmental, social, and governance (ESG) disclosures, based on the requirements established in Circular 031 of 2021 and internationally recognized standards widely used by institutional investors. As a result, commitments were established to advance the financial quantification of ESG and climate-related risks, improve the definition and monitoring of measurable targets, and continue aligning disclosures with international standards. Progress against these commitments will be monitored during the 2026 engagement cycle.
- In 2025, Corficolombiana consolidated its Strategic Engagement and Coordination Cells (CREA), covering 26 directly controlled portfolio companies, and strengthened the monitoring of ESG indicators. In the climate arena, it worked with Covipacífico, Pajonales, and Hoteles Estelar on the second phase of their Decarbonization Plans. This process enabled the identification, prioritization, and assessment of more than 100 potential Scope 1, 2, and 3 emissions mitigation initiatives, the development of marginal abatement cost curves, and the structuring of potential investment plans through 2033.
- Aval Fiduciaria renewed its commitment to the PRI and further strengthened ESG integration within its asset management activities.

Engagement with issuers complements responsible investment analysis through dialogue, the definition of expectations, commitment monitoring and, where appropriate, the application of escalation mechanisms.

During 2025, Grupo Aval conducted 17 engagement processes with its four banking entities, which represented 81.3% of consolidated assets. The main topics addressed were climate strategy (5), sustainable finance (5), ESG risk management (1), positioning (3), and the strengthening of Sustainable ROE (3). As a result, nine commitments were agreed, all of which were completed, generating verifiable changes in policies, processes, targets or practices.

5. VOTING AND PARTICIPATION IN GOVERNANCE BODIES

The exercise of political rights constitutes a complementary mechanism of influence and oversight within the stewardship process. Grupo Aval exercises these rights through its participation in

shareholders' meetings, boards of directors, and committees of its subsidiaries, in accordance with its corporate governance framework and conflict of interest management policies.

During 2025, Grupo Aval participated in approximately ten annual shareholders' meetings and more than 200 Board of Directors sessions across its subsidiaries, promoting decisions aligned with its corporate guidelines and ESG criteria. The ESG Committee of Grupo Aval's Board of Directors reviewed and assessed nine ESG-related matters, including seven corporate policies and two presentations on sustainability management. The Board approved 100% of the ESG proposals submitted for its consideration, demonstrating the integration of sustainability into strategic decision-making.

In addition, our subsidiaries exercised voting rights associated with both controlling and minority investments in accordance with their internal policies and guidelines. This mechanism allows them to express their position on material decisions proposed by issuers, promote ESG best practices, and, where appropriate, reinforce engagement and escalation processes.

As a holding company, Grupo Aval promotes the responsible exercise of voting rights through its Corporate ESG Policy, Corporate Governance Framework, and ongoing engagement with its subsidiaries. Voting decisions are expected to support the long-term sustainability, strong corporate governance practices, and value creation of invested companies, taking into consideration material ESG factors relevant to each investment. These may include corporate governance practices, business ethics, board effectiveness, human capital management, environmental performance, human rights, and the quality of ESG disclosures. Subsidiaries that exercise voting rights directly assess material resolutions in accordance with their respective policies and governance frameworks, seeking to promote ESG best practices and protect the long-term interests of shareholders and other stakeholders.

In 2025, Corficolombiana exercised political rights associated with its investments through participation in more than 70 shareholders' meetings and 185 Board of Directors sessions. Porvenir, in turn, concentrates the exercise of voting rights on internally managed assets, which represent 13.07% of its total assets under management, in accordance with its participation policy and sustainable investment guidelines.

6. ESCALATION MECHANISMS

Escalation is an integral part of the engagement process and is activated when gaps, material risks, non-compliance or insufficient progress against agreed commitments are identified. Its purpose is to progressively increase the level of monitoring and involvement, promote corrective action, and ensure that relevant matters are reviewed by the appropriate governance bodies. The intensity and level of escalation are determined based on the nature, materiality and evolution of each matter.

Depending on the circumstances, the process may include:

1. Bilateral follow-up with the entity.
2. Definition of commitments and action plans.
3. Monitoring through indicators and reports.
4. Review by corporate committees.
5. Presentation to Board support committees.
6. Escalation to the Board of Directors.
7. Referral to the General Shareholders’ Meeting, where appropriate.

8. Follow-up by the Comptroller's Office, Internal Audit, Risk or Compliance.
9. Implementation and verification of corrective measures.