

1. OBJECTIVE

To establish corporate guidelines for the acquisition, development, implementation, use, and oversight of artificial intelligence (AI) solutions, promoting management based on principles of ethics, security, transparency, privacy, human oversight, regulatory compliance, and risk management.

2. SCOPE

This Policy applies to Grupo Aval Acciones y Valores S.A. (Grupo Aval) and its subsidiaries. Compliance is mandatory for employees, directors, officers, and third parties involved in the acquisition, development, implementation, operation, or use of AI solutions.

It applies to different AI technologies and modalities, including generative AI, large language models, machine learning, advanced analytics, intelligent automation, virtual assistants, recommendation and prediction systems, AI agents, and AI-as-a-Service solutions, whether developed internally or provided by third parties.

3. RESPONSIBLE AI GUIDELINES

This Policy:

- Defines and implements a Responsible AI Program establishing the processes, roles, controls, and tools necessary to ensure that the development, acquisition, implementation, and use of AI systems are conducted in an ethical, secure, transparent, and responsible manner, aligned with the principles set forth in this Policy.
- Guides the acquisition, development, implementation, use, and oversight of AI solutions. Its application shall be proportional to the risk level, criticality, and impact of each use case, taking into account applicable Colombian regulations, the National Artificial Intelligence Policy, the OECD AI Principles, the NIST AI Risk Management Framework, ISO/IEC 42001, and the restrictions established by the European Union Artificial Intelligence Act regarding prohibited uses.
- Promotes the integration of environmental, social, and governance (ESG) considerations into the use of proprietary and third-party AI solutions, including the assessment of impacts related to sustainability, human rights, inclusion, equity, accessibility, energy efficiency, responsible resource use, and environmental footprint reduction. Risk and impact assessments, due diligence processes, design validations, and periodic monitoring mechanisms may be conducted for this purpose.

3.1. Governance and Accountability

The use of AI systems is intended as a support tool for management and decision-making and does not replace professional judgment, accountability, or the responsibilities assigned to individuals or governance bodies within Grupo Aval and its subsidiaries. Decisions supported by AI remain the responsibility of the relevant business areas.

Any tool, system, model, or application incorporating AI functionalities, whether developed internally or acquired from third parties, shall have at least the following governance structure, which may not be delegated exclusively to the provider:

- ✓ Business owner
- ✓ Technical owner

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- ✓ Participating control functions
- ✓ Required approval level
- ✓ Monitoring owners.

3.2. Privacy, Data Protection, and Intellectual Property

- The use of AI shall comply with internal requirements regarding personal data protection, information confidentiality, intellectual property, and all applicable legal and regulatory obligations, including Law 1581 of 2012, Decree 1377 of 2013, and guidance issued by the Superintendence of Industry and Commerce (SIC).
- AI systems shall be used consistently with the organization's confidentiality and data protection policies. Accordingly, confidential, restricted, privileged information or personal data may not be shared with AI tools that do not have the appropriate controls and approvals.
- Copyright ownership over both the information used and the content generated through AI tools shall be respected in accordance with applicable laws and corporate policies

3.3. Information Security and Cybersecurity

- AI solutions shall comply with the information security and cybersecurity requirements established by Grupo Aval and incorporate controls appropriate to their risk level and the nature of the information processed.
- Throughout the AI lifecycle, including design, development, acquisition, implementation, operation, monitoring, and retirement, appropriate security measures shall be implemented, such as content filtering, vulnerability monitoring, prompt validation, protection against model manipulation, and other relevant mechanisms.

3.4. Transparency, Traceability, and Reasonable Explainability

- AI developments provided by third parties, as well as AI-generated decisions or recommendations, shall be traceable and clearly identify their purpose, limitations, intended use, and accountable parties. They shall be subject to review when warranted by their nature or impact.
- Where an AI solution may influence decisions affecting rights, economic conditions, access to products or services, employment, or similar matters, effective human oversight shall be required.

3.5. Ethical Use, Fairness, and Non-Discrimination

In the development, acquisition, and use of AI solutions, Grupo Aval and its subsidiaries shall adhere to their corporate principles, commitments, and guidelines regarding ethics, human rights, diversity, inclusion, and respect for human dignity. AI solutions shall not be used in a way that results in discrimination, exclusion, inappropriate bias, or unjustified treatment affecting individuals or stakeholders.

AI use cases with the potential to significantly affect individuals' rights, opportunities, conditions, or decisions shall be identified and assessed before implementation or production deployment. Such

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assessments shall consider the level of AI-related risk and seek to identify, prevent, and mitigate bias, discrimination, errors, or other adverse impacts.

3.6. Permitted, Restricted, and Prohibited Uses

AI may be used to enhance innovation, operational efficiency, risk management, analytics, automation, and decision support, provided that the requirements established in this Policy are respected.

Prohibited uses include, among others:

- Completely replacing human judgment in any decision.
- Using unauthorized AI tools to process confidential information or personal data.
- Generating false, misleading, or discriminatory information.
- Developing solutions intended to violate rights, privacy, security, or applicable laws.
- Implementing systems classified as prohibited under applicable legislation or corporate policies.

3.7. AI Lifecycle Management

- Every AI solution shall be managed throughout its lifecycle, from evaluation, acquisition, or development to retirement, ensuring the implementation of risk, security, quality, monitoring, and continuous improvement controls.
- Significant changes made to an AI solution shall be evaluated before deployment.

3.8. Third-party management

The procurement of AI solution providers shall include a risk assessment covering information security, data protection, privacy, service continuity, regulatory compliance, intellectual property, incident response, vulnerability management, and the provider's level of transparency. Contracts shall include the obligations necessary to ensure compliance with this Policy.

3.9. Monitoring, incidents, and continuous improvement

Implemented solutions shall be monitored periodically to verify:

- ✓ Accuracy of results
- ✓ Effectiveness of controls
- ✓ Significant performance changes
- ✓ Emerging risks
- ✓ Related incidents
- ✓ Compliance with this Policy

Where material deviations are identified, remediation and follow-up plans shall be established.

3.10. Metrics and reporting

Indicators shall be defined and monitored to measure the effectiveness of the Responsible AI Program, including, where applicable, metrics relating to adoption, identified risks, AI sustainability indicators, incidents, detected biases, control compliance, model performance, training, improvement actions, and periodic reporting to the relevant governance bodies.

3.11. Sustainability

In the development of AI solutions and in the procurement, selection, and evaluation of providers associated with these technologies, considerations related to energy efficiency, environmental footprint

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reduction, and environmental management shall be incorporated whenever feasible and proportionate to the use case. These considerations may be reflected in provider assessments, procurement processes, and solution design requirements

3.12. Training and organizational culture

This Policy promotes training programs designed to strengthen the responsible use of AI among employees and authorized third parties across Grupo Aval and its subsidiaries. As applicable, training activities shall cover:

- ✓ Policy requirements
- ✓ AI ethics
- ✓ Data protection
- ✓ Information security
- ✓ Associated risks
- ✓ Best practices
- ✓ Authorized tools
- ✓ User responsibilities

3.13. AI solutions inventory

An updated inventory of AI systems, models, tools, and use cases shall be maintained, including at a minimum:

- ✓ Business owner
- ✓ Technical owner
- ✓ System purpose
- ✓ Data used
- ✓ Lifecycle status
- ✓ Implemented controls

Information security and technology functions, in coordination with business and user areas that develop, acquire, or use AI solutions, shall collaborate in identifying, recording, updating, and monitoring this inventory.

3.14. Risk assessment

Before implementing an AI solution, a risk assessment proportionate to its criticality shall be conducted. At a minimum, it shall consider:

- ✓ Privacy and data protection
- ✓ Information security
- ✓ Cybersecurity risks
- ✓ Regulatory compliance
- ✓ Human rights
- ✓ Operational and reputational risks
- ✓ Third-party dependencies
- ✓ Environmental impacts, when relevant
- ✓ Business continuity

The assessment shall be updated whenever significant changes occur in the model or its use.

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3.15. Documentation and traceability

At a minimum, the following documentation shall be retained to demonstrate lifecycle management of AI solutions:

- ✓ Assessments conducted
- ✓ Approvals obtained
- ✓ Risks identified
- ✓ Controls implemented
- ✓ Significant changes
- ✓ Incidents
- ✓ Monitoring activities
- ✓ Decisions adopted

Documentation shall be maintained in accordance with document management policies and procedures.

4. GLOSSARY

- **Artificial Intelligence (AI):** A machine-based system that, with varying levels of autonomy, can generate outputs such as predictions, content, recommendations, classifications, or decisions based on input data.
- **AI System:** A combination of models, algorithms, data, infrastructure, rules, interfaces, processes, and controls that enable the development, operation, or use of AI capabilities.
- **Generative AI:** A type of AI capable of generating text, images, audio, video, code, simulations, or other novel content based on instructions, data, or learned patterns.
- **Bias:** A systematic deviation in data, models, processes, or outputs that may result in errors, exclusion, discrimination, or unfair treatment.
- **Explainability:** The ability of an AI system to clearly and understandably explain how it arrived at a result, recommendation, or decision.
- **Transparency:** The obligation to clearly and adequately disclose the use, purpose, scope, limitations, and responsible parties associated with an AI system, depending on the context.
- **Human Oversight:** The effective ability of a competent individual to review, validate, modify, suspend, reverse, or intervene in a decision or output generated by AI.
- **AI Ecological Footprint:** The environmental impact associated with the development, training, operation, storage, processing, and use of AI systems, including energy consumption, emissions, water use, infrastructure, and technology lifecycle considerations.

CHANGE CONTROL

DATE	VERSION	REASON FOR CHANGE
2026	1	Initial issuance of the document

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