

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

ACRONYMS AND ABBREVIATIONS

Acronym	Description
ASC	Environmental, Social and Climate issues.
CE-031	External Circular 031 of 2021 from <i>Superintendencia Financiera de Colombia</i> – SFC (Financial Superintendency of Colombia).
ESG	Environmental, Social and Governance issues.
GHG	Greenhouse Gases.
IFRS	International Financial Reporting Standards Foundation.
ISSB	International Sustainability Standards Board.
NDC	Nationally Determined Contributions.
IFRS S2	International Financial Reporting Standard on Sustainability 2.
SFC	<i>Superintendencia Financiera de Colombia</i> (Financial Superintendency of Colombia).
TCFD	Task Force on Climate-Related Financial Disclosure.

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

KEY CONCEPTS

- **Carbon neutral:** condition in which, over a given period, the carbon footprint has been reduced as a result of emissions mitigation or increased removals, and if it is greater than zero, it is counteracted by offsets. [Source: ISO 14068-1:2023].
- **Net zero emissions:** condition in which residual GHG emissions are balanced by the subject's associated removals over a given period and within specified limits. [Source: Adapted from IWA 42:2022].
- **GHG Offsetting:** Reducing or removing emissions resulting from an action taken outside the organization's boundaries that is used to offset residual emissions from the organization. [Source: ICONTEC, 2024].
- **Absolute emissions:** a way of presenting an entity's unmitigated GHG emissions, in which the results are presented in relation to time, without correlating the result with any other variable (e.g. tCO₂e e/year). [Source: ICONTEC, 2024].
- **Neutralized emissions:** those residual GHG emissions that, after applying all technically feasible reduction measures, are offset or balanced by natural or anthropogenic GHG removals, so that the net balance of emissions with respect to those emissions is zero in a specific period and within certain limits (geographical scope, scope of emission sources, etc.). [Source: Adapted from IWA 42:2022].
- **Relative emissions:** a way of presenting an entity's unmitigated GHG emissions, in which they are related to an activity variable (e.g. tCO₂e/ton produced). [Source: ICONTEC, 2024].
- **Carbon footprint:** sum of the entity's greenhouse gas emissions and removals, expressed as carbon dioxide equivalent. [Source: ISO 14068-1:2023].
- **GHG emission reduction:** quantified reduction in greenhouse gas emissions, specifically related to or resulting from an activity between two points in time or in relation to a baseline. [Source: IWA 42:2022].
- **Direct GHG removal:** removal of a GHG from the atmosphere through GHG sinks (Direct Air Capture or DAC) or preventing the GHG from reaching the atmosphere through Carbon Capture and Storage (CCS) mechanisms, when any of these systems is within the limits defined for the subject. [Source: adapted from NTC ISO 14064-1:2020].

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

1. CONTEXT

Grupo Aval is one of the most important business conglomerates in Colombia, with more than 50 years of history and continuous growth. Through its main entities – such as Banco de Bogotá, Banco de Occidente, Banco Popular, Banco AV Villas, Corficolombiana and Porvenir – it operates in sectors such as financial services, pensions, infrastructure, energy, agribusiness and tourism. Thanks to this presence, it serves millions of people and companies in 96% of the national territory, promoting financial inclusion, pension savings, responsible investment and sustainable economic development.

Aware of its responsibility to the country, Grupo Aval recognizes the significant impact that its activities generate both in the environmental and social environment. In this sense, climate change has become one of the priority issues within its sustainability strategy, which is why the organization is actively working on its management, with the aim of contributing to the construction of a more resilient future and the transition to a low-carbon economy.

Climate change is one of the greatest threats to sustainable development and global financial stability. In this context, Grupo Aval, as a financial holding company¹, has identified that the main impact comes from its main entities, which concentrate most of its operations, and are grouped into 3 lines of business: 1) Banks, 2) Financial Corporation, and 3) Pension Fund Administrator.

Aware of the challenge posed by climate change management and other sustainability-related issues, Grupo Aval's **Corporate ESG Policy**, approved by the Board of Directors, establishes a common framework of guidelines that inform decision-making and sustainability management across all entities that are part of Grupo Aval.

2. INTRODUCTION

Within the framework of its ESG Corporate Policy and its commitment to sustainability, Grupo Aval, together with its main entities, made progress in defining a **Climate Strategy** that establishes clear guidelines to strengthen the management of the impacts derived from its operations.

This document presents Grupo Aval's Climate Strategy, which adopts the guidelines of IFRS S2 (NIIF S2), developed by the International Financial Reporting Standards Foundation (IFRS) from the International Sustainability Standards Board (ISSB). In addition, its scope is aligned with the requirements established by External Circular 031 of 2021 (hereinafter, CE 031) of the Financial Superintendence of Colombia (hereinafter, SFC) and the requirements established for issuers belonging to Group A, who, among other requirements, must provide information on climate issues, following the recommendations

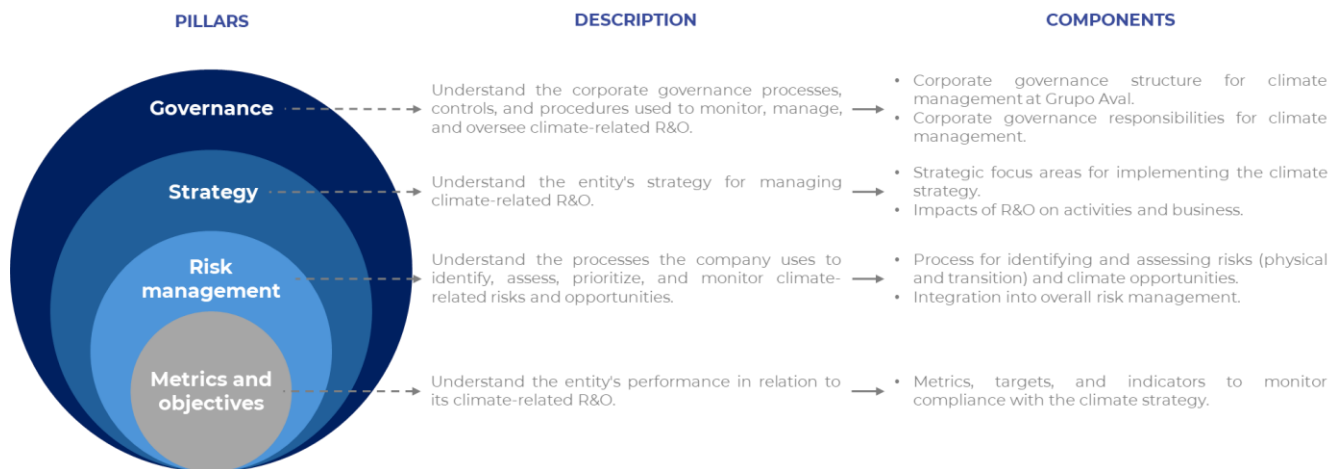
¹ Grupo Aval is a financial holding company that does not offer products or services directly, as it does so through its entities. For this reason, the Climate Strategy involves the most relevant entities for the Group in proportion to their controlling stake, considering financial materiality criteria: Banco de Bogotá, Banco de Occidente, Banco Popular, Banco AV Villas, Corficolombiana and Porvenir.

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

of the Task Force on Climate-Related Financial Disclosure (TCFD)² now adopted and strengthened by IFRS S2.

The structure of the Climate Strategy is based on the strategic direction for the management of climate issues at the corporate level and contemplates the particular nature of its three main lines of business and is designed based on these recommendations, which are articulated around four fundamental pillars: 1) Governance, 2) Strategy, 3) Risk management, and 4) Metrics and objectives, as detailed below:

Illustration 1. Pillars of the Climate Strategy.



² While to date, the Financial Superintendence of Colombia (SFC) has not issued amendments to External Circular 031 of 2021 that expressly replace references to the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) with other frameworks or standards, the clarifications published by the SFC on October 10, 2023 expose and acknowledge that the TCFD recommendations have been incorporated and strengthened in the IFRS S1 standards and S2, issued by the International Sustainability Standards Board (ISSB), which allows them to be interpreted as a natural evolution of this framework. To this extent, from a technical perspective, it is intended that Grupo Aval voluntarily adopts the provisions of IFRS S2 as a strengthened way to exercise its disclosure as a Group A issuer. The foregoing, in accordance with international advances in climate disclosure and under the principles of proportionality and materiality that guide the implementation of CE-031 of 2021.

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

3. GOVERNANCE PILLAR

3.1 CORPORATE GOVERNANCE FOR CLIMATE MANAGEMENT

To address climate issues, the sustainability governance structure defined in the ESG Corporate Policy is followed, which comprehensively addresses the management of ESG issues.

Illustration 2. Corporate Governance for the climate management of Grupo Aval.



The **Board of Directors** is the highest management body in ESG matters and has the responsibility of defining the sustainability strategy and approving corporate policies related to social and environmental issues, including climate change. Their role is to ensure proper management of these aspects, and to promote the sustainable development of the organization. For monitoring and decision-making on ESG matters, the Board of Directors has the **ESG Committee**, made up of three of its members with a diversity of knowledge and preferably with experience in sustainability. This Committee analyzes the alignment of the strategy and policies with the strategic objectives of the group and with international best practices.

The **Presidency of Grupo Aval**, with the support of the **Vice Presidency of Sustainability and Strategic Projects (ESG Officer)**, is in charge of leading the sustainability strategy, communicating progress to the Board of Directors and integrating these principles into the decision-making of the business model.

The **Vice-Presidency of Sustainability and Strategic Projects** is in charge of implementing the ESG Corporate Policy, integrating the initiatives of the different areas to ensure coherent and effective management, monitoring the progress of the commitments established in ESG matters, proposing guidelines for the implementation of this Policy in the group's entities, consolidate, analyze and disclose sustainability information, and provide timely training to different stakeholders on environmental, social and corporate governance issues, including those related to climate change.

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

The **Corporate Vice Presidency of Risk and Compliance** is responsible for the identification and management of risks and opportunities related to social and environmental issues, including climate change.

The **Entities Sustainability Committee** is responsible for coordinating the execution of actions and promoting the adoption of best practices and international standards. Is also responsible for ensuring that ESG principles are effectively integrated into the group's sustainability strategies, strengthening regulatory compliance, risk management, operational efficiency and innovation.

In addition, across the board, the **ESG Strategic Working Group** and the **Internal Audit Department** play a supporting role in the main climate governance structure, contributing to the implementation and monitoring of the guidelines established by the responsible bodies. As part of their responsibilities, they support the monitoring of progress and challenges related to climate change management, including the management of risks and opportunities, as well as their gradual integration into the organization's business model.

3.2 RESPONSIBILITIES FOR CLIMATE CHANGE MANAGEMENT

Based on the previous structure, the responsibilities that strengthen supervision, management and execution for the fulfillment of the Climate Strategy have been strengthened.

Board 1. Corporate Governance responsibilities for the climate management of Grupo Aval.

MAIN STRUCTURE		
BODY	DESCRIPTION OF RESPONSIBILITIES	TRACKING
Board of directors	It is the highest corporate governance body, with interference in Grupo Aval's decision-making on climate matters. Their responsibilities focus on: - Approve the ESG Corporate Policy and its updates, which guarantee Grupo Aval's compliance with corporate governance, social and environmental issues, including climate issues. - Monitor and ensure that there is a strong and accountable governance structure in relation to climate matters.	Bimonthly
ESG Committee	Made up of three members of the Board of Directors, it is responsible for: - Approve the Climate Strategy and its updates, and monitor the established climate goals, metrics, and objectives. - Supervise compliance with the metrics, goals and objectives of Grupo Aval's Climate Strategy. - Monitor the management of Climate-related risks and opportunities. - Participate in the sessions led by the Corporate Vice Presidency of Sustainability and Strategic Projects.	Bimonthly
Presidency	The Presidency of Grupo Aval is responsible for: Ensure that climate change management is integrated into corporate vision, mission and strategy.	Bimonthly

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

	• Validate and support the ESG Corporate Policy and the Climate Strategy, ensuring its consistency with international regulations and best practices. • Lead and direct the Climate Strategy and promote its implementation at all levels of the organization.	
Corporate Vice Presidency of Risk and Compliance	It is the management body of Grupo Aval that is responsible for: • Provide instructions and guidelines related to the risks and opportunities of climate change. • Integrate the identification, assessment, monitoring and control of climate risks into the comprehensive risk management system. • Ensure compliance with national and international regulations related to climate change, including regulatory reporting and ESG standards. • Identify, assess and manage climate risks and opportunities that allow adaptation and mitigation actions to be established.	Bimonthly
Corporate Vice Presidency of Sustainability and Strategic Projects	It is the management body of Grupo Aval that is responsible for: • Develop and update the ESG Corporate Policy and Climate Strategy. • Implement, lead and coordinate the Climate Strategy of Grupo Aval and its entities under a strategic and cross-cutting vision. • Provide instructions and guidelines related to climate change management, integrating it into policies, processes and business decisions, at Group level. • Ensure compliance with national and international standards and lead the preparation of sustainability and climate reports (TCFD, GRI, SASB). • Support the process of identifying, assessing and managing climate risks and opportunities, in coordination with the Corporate Vice Presidency of Risk and Compliance. • Regularly report to the Presidency, ESG Committee and Board of Directors on progress in climate management. • Provide training to the Board of Directors and Senior Management on the importance of climate and sustainability issues.	Permanent
Entities Committee	Led by the Corporate Vice Presidency of Sustainability and Strategic Projects and the Sustainability Department, it has the following responsibilities: • Manage and supervise compliance with the guidelines established by Grupo Aval, regarding ESG and climate change issues, which are applicable transversally to all entities. • Ensure the effective implementation of the Climate Strategy and the ESG Corporate Policy, coherently integrating climate, environmental, social and corporate governance objectives into the strategies and operations of the organizations that make up the conglomerate. • To share good practices in terms of sustainability and climate change, which allow strengthening cross-cutting management at Group level. <i>*It is clarified that this Committee is not a decision-making space.</i>	Monthly

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

TRANSVERSAL STRUCTURE		
BODY	DESCRIPTION OF RESPONSIBILITIES	TRACKING
ESG Strategic Working Group (executive meetings)	An executive coordination forum composed of representatives from the Risk and Compliance, Sustainability and Strategic Projects, and Finance Vice Presidencies. Its purpose is to facilitate the cross-functional coordination of environmental, climate, social, and governance (ESG) initiatives, promoting alignment among the responsible areas and monitoring the implementation of actions defined by the relevant governance bodies. This forum reviews progress, challenges, and implementation needs related to the organization's priority ESG matters, as well as topics that may be escalated to the ESG Committee and the Board of Directors, when appropriate. <i>*The participation of other areas or organizational levels is determined based on the nature of the topics discussed and the actions required.</i>	Quarterly
Internal Audit Department	Independently evaluates the management of climate-related risks and their integration into the organization's processes, controls, and risk management mechanisms, verifying that such risks are appropriately considered in risk identification, assessment, monitoring, and control processes. As part of its assurance role, it periodically reviews the effectiveness of controls and processes related to climate risk management and provides recommendations aimed at strengthening the internal control framework.	Annual

4. STRATEGY PILLAR

4.1 GRUPO AVAL'S CLIMATE COMMITMENT

Grupo Aval has formalized its commitment to climate change by establishing strategic objectives that guide its entities to integrate climate management across their operations, business models, and decision-making. This strategy seeks to promote low-carbon operations and encourage environmentally responsible financing and investment.

In line with national and international frameworks, and the best practices of the financial sector, Grupo Aval has defined clear goals that allow it to move towards sustainable, resilient development aligned with the global challenges of climate change. Below are the main climate objectives that guide this vision and its implementation within the Group.

Board 2. Objectives of Grupo Aval's Climate Strategy.

Objective	Scopes covered
Promote a 51% reduction in emissions by 2030.	Scope 1, 2 and 3 ³ .
Driving carbon neutrality by 2050.	

Grupo Aval sets these objectives as part of its commitment to promote compliance with **Colombia's**

³ For scope 3, including category 15 (financed emissions or from investments), gradual reduction targets will be established based on minimum viable as a result of measurements that consider valid methodologies (e.g., Partnership for Carbon Accounting Financials (PCAF), Science Based Targets initiative (SBTi) or The Carbon Neutral Protocol).

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

Nationally Determined Contributions (NDCs), which are aligned with the **Paris Agreement**. This agreement sets a common goal among countries to keep the Earth's temperature rise below 2°C (compared to pre-industrial levels), and to do everything possible to keep it below 1.5°C.

In addition to aligning with Colombia's NDC and the Paris Agreement, these objectives are consistent with the policies and agreements set out in **Colombia's Long-Term Climate Strategy (E2050)**, in **Colombia's Third National Climate Change Communication (TCNCC)**⁴, and in the commitments promoted by the **Asociación Bancaria y de Entidades Financieras de Colombia (Asobancaria)**, for its key role in integrating sustainability and climate action within the Colombian financial sector.

Grupo Aval defined 2024 as the base year for the definition of its climate change mitigation and adaptation strategies. Below are the GHG emissions.

Board 3. Carbon footprint of Grupo Aval Holding – 2024.

Scopes	GHG emissions (t CO ₂ e/year)	Coverage ⁵
Scope 1	4.32	100.0%
Scope 2 (location based / market based)	36.15 / 0.0	100.0%
Scope 3	25,456.38 ⁶	99.8%
Total	25,496.85	99.8%

The following table shows the details of the categories that are included in scope 3 emissions:

Board 4. Scope 3 GHG emissions of Grupo Aval Holding – 2024.

Categories	GHG emissions (t CO ₂ e/year)	Coverage
1. Goods and services purchased	470.04	91.6%
2. Capital goods	3.88	100.0%
5. Waste generated by the operation	5.43	100.0%
6. Business Travel	5.28	100.0%
7. Employee commute	78.02	82.4%
15. Financed emissions⁷	24,893.73	100.0%
Total	25,456.38	99.8%

⁴ Subject to updates of national frameworks (Colombia's Fourth National Climate Change Communication).

⁵ Additionally, to complement the historical data, we incorporate the calculation of weighted coverage, an indicator that allows us to determine the level of coverage of the measurement of our carbon footprint in the three scopes.

⁶ The data corresponding to 2023 and 2024 of scope 3, category 15 (financed emissions or emissions associated with our subsidiaries), were reexpressed in order to ensure consistency and comparability between the different reference periods.

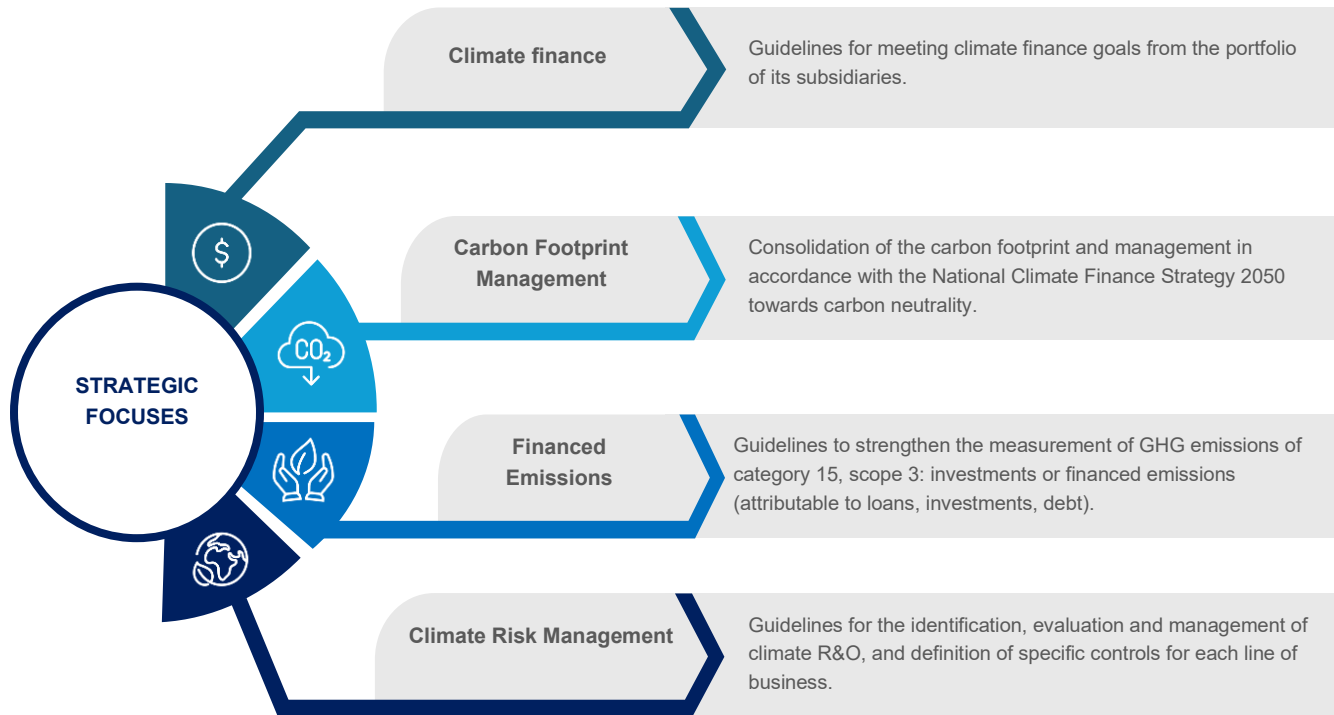
⁷ It is important to note that the measurement of scope 3, especially category 15, is a process in constant evolution, which in turn depends on the measurements made by the entities of Grupo Aval. Therefore, the quality and accuracy of the information will be updated and perfected as each entity advances in its climate strategies.

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

4.2 STRATEGIC FOCUSES FOR CLIMATE MANAGEMENT

To achieve these objectives, Grupo Aval defined four strategic areas of focus for which goals, indicators, and responsible parties were established to ensure timely management.

Illustration 3. Strategic focuses for Grupo Aval's climate management.



For the implementation of the Climate Strategy, actions have been established for each of the strategic focuses as shown in the following table:

Board 5. Actions defined by strategic focus.

STRATEGIC FOCUS	ACTION	DETAIL OF THE ACTION
Climate finance	Establish guidelines for the strengthening of the green portfolio, especially the climate portfolio, in Grupo Aval entities.	- Propose climate financing goals aligned with <i>Asobancaria</i> green portfolio growth goals (placement and fundraising through Green Financial Products, especially climate products). - Establish reference metrics, according to the Green Taxonomy of Colombia, that allow categorizing the destinations of use of financing. - Benchmark existing Green Financial Products in the market to identify alternatives that strengthen the current lines of the green portfolio. - Conduct a qualitative feasibility analysis and prioritization of Green Financial Products. - Conduct a quantitative feasibility analysis that defines costs, complexity, and implementation capacity of the three alternatives. Prioritized.

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

		• Define the financial and technical characteristics of viable Green Financial Products based on quantitative analysis. • Design and execute a market strategy for the new Green Financial Products.
Carbon Footprint Management	Comprehensively manage the GHG emissions of Grupo Aval and its entities.	• Perform the annual measurement of GHG emissions for scope 1 and 2, ensuring coverage for 100% of operations • Carry out the annual measurement of GHG emissions for scope 3, including category 15, and at least the categories: 1) Goods and services purchased, 2) Capital goods, 5) Waste generated by the operation, 6) Business trips, and 7) Employee displacement, established in the GHG Protocol. • Develop reduction, compensation⁸, and operational neutralization⁹ plans, prioritizing the maximum possible reduction of GHG emissions and complementing this with actions to capture, remove, and offset residual emissions.
	Establish decarbonization plans in Grupo Aval and its entities.	• Formulate and implement its decarbonization plan, ensuring the progressive reduction of operational emissions (scopes 1 and 2) and, subsequently, the inclusion of gradual goals for the management and reduction of scope 3 emissions. • Consolidate and monitor progress, ensuring alignment with global and national commitments (IFRS S2, TCFD, E2050, NDC, Green Protocol, Circular 031 – SFC, SBTi, among others).
	Disclose relevant information on the management of GHG emissions (including reduction, removal, and offsetting).	• Consolidate, integrate and disclose annual information on progress in reducing emissions, removals and use of offsets (including carbon credits or equivalent projects), in order to strengthen climate transparency and provide traceability to the neutralization of emissions.
Financed emissions	Strengthen the quantification and management of financed emissions (category 15) in Grupo Aval and its entities.	• Develop and improve their capacities to measure, manage and disclose their financed emissions, in order to identify the most emissions-intensive sectors and activities within the portfolio. • Establish mitigation initiatives that allow the intensity of the financed emissions to be progressively reduced. • Promote the progressive reduction of the intensity of financed emissions (tCO₂e/monetary unit financed), respecting the particularities and goals of each entity.

5. RISK MANAGEMENT PILLAR

5.1 ANALYSIS OF RISKS AND OPPORTUNITIES ASSOCIATED WITH CLIMATE CHANGE

Climate risks, both physical (such as extreme weather events) and transition risks (regulatory, technological and market changes), may affect the solvency and profitability of the assets financed, as well as the financial stability of Grupo Aval and its entities.

For this reason, with the support of the global consulting firm ERM, an analysis of risks and opportunities associated with climate change was carried out as a fundamental step to:

⁸ The compensation must have its respective certificate.

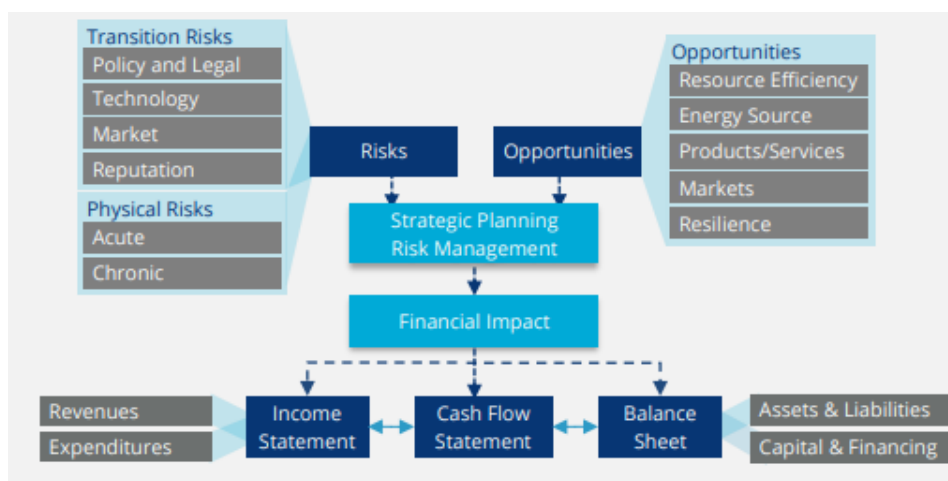
⁹ The reduction and neutralization must be supported by verification under recognized standards to align with international reporting frameworks such as: GHG Protocol, ISO 14064 or The Carbon Neutral Protocol.

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

- Identify and proactively manage the impacts that climate change may have on the investment portfolio, loan portfolio, operations and physical assets of Grupo Aval and its entities.
- Identify strategic transition opportunities to contribute to a low-carbon economy, through the financing of sustainable projects, innovation in green financial products and the development of new lines of business.

Although climate change impacts almost all sectors, the type and level of risk vary depending on the sector, industry, location, and organization. For this reason, for Grupo Aval as a leader in the financial sector, it is key that investors, lenders and insurers have sufficient information to understand how these risks and opportunities may influence the future financial situation of the organization, including its profits, cash flow and assets.

Illustration 4. Climate-related risks, opportunities and financial impact¹⁰.



5.2 METHODOLOGY FOR THE IDENTIFICATION OF CLIMATE RISKS AND OPPORTUNITIES

The methodology applied to identify Grupo Aval's potential climate risks and opportunities was as follows:

Illustration 5. Methodology applied for the identification of climate risks and opportunities.



5.2.1 CONTEXT ANALYSIS

An exhaustive analysis of the internal and external context was carried out. First, the internal analysis included the review of Grupo Aval's double materiality exercise, complemented by the results of consultations carried out with key areas of the holding company such as risks and compliance,

¹⁰ Image taken from the Recommendations of the Task Force on Climate-related Financial Disclosures – TCFD (2017).

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

sustainability, strategic planning, among others. In addition, the diagnosis of the state of progress of climate management in the Group's entities was integrated, based on interviews and documentary reviews.

Subsequently, an external analysis was conducted using benchmarking to examine other leaders in the financial sector, along with the study of economic, social, regulatory, technological, market, reputational and cultural factors. In addition, a review of key national and international guidelines and frameworks for climate management was incorporated, such as: Colombia's Nationally Determined Contributions (NDCs), Asobancaria's Green Protocol, Colombia's Green Taxonomy, among others.

5.2.2 IDENTIFICATION OF CLIMATE RISKS AND OPPORTUNITIES

The process of identifying climate risks allows us to recognize and understand the possible impacts derived from climate change and the effects that they may generate for the organization, both in its operation and in its financial and reputational environment. To this end, the different stages of Grupo Aval's value chain were analyzed, considering its role as a financial holding company, encompassing **upstream activities**, corresponding to the strategic and support functions that the organization exercises at the corporate level; **its own operations**, which include internal operational activities that generate direct impacts; and **downstream activities**, related to the indirect impacts generated through their entities.

Subsequently, a comprehensive mapping of the possible risks and opportunities associated with climate change that may affect its operation, investment portfolio and regulatory environment was carried out. In this process, **physical risks** were considered, which include acute climatic events such as floods and hurricanes, as well as chronic risks such as rising temperatures and water scarcity; **transition risks**, associated with regulatory, technological, market and reputational changes derived from the transition to a low-carbon economy; and **climate opportunities**, arising from innovation in sustainable financial products, improved operational resilience and the possibility of leveraging regulatory and market incentives to foster such a transition.

5.2.3 CLIMATE SCENARIO ANALYSIS

The analysis of climate scenarios allows the evaluation of the possible impacts of climate change on operations, investment portfolios and business relationships.

5.2.3.1 ANALYSIS OF PHYSICAL CLIMATE HAZARDS

The physical climate risk analysis for Grupo Aval was based on the capital balance of the banking business line and on climate data available at the departmental level, extracted from the Third National Communication on Climate Change of Colombia – TCNCC (IDEAM, 2017). To perform this analysis, an average assembly method was used that considers several science-based climate scenarios: RCP 2.6, 4.5, 6.0 and 8.5.

Representative Concentration Trajectories (RCPs) are theoretical projections that describe different future scenarios of greenhouse gas concentrations in the atmosphere, adopted by the Intergovernmental Panel on Climate Change (IPCC). These trajectories allow the potential impact of climate change to be

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

modelled under different levels of emissions and are therefore critical for identifying and assessing the physical climate risks to which an entity may be exposed, such as changes in temperature, precipitation and extreme events, helping to anticipate and plan effective adaptation measures.

5.2.3.2 TRANSITION CLIMATE RISK ANALYSIS

The transition risk scenario proposed to achieve the Paris Agreement targets is based on the assumption that both governments and the private sector will have to take decisive action to limit global temperature rise to between 1.5 and 2.0 °C by 2050. This will imply significant reductions in greenhouse gas (GHG) emissions by 2030. As a result, an increase in transition risks is expected that will have a considerable impact on all companies.

The consolidation of risks and opportunities by category, with the impact scenarios, is detailed below¹¹.

Board 6. Analysis of climate risks and opportunities, and impact scenarios.

Category	Risks	Opportunities	Possible scenario and impact (IEA NZE2050)	Indicative impact
Policy and Legal	• Limitations on the ability to generate value in entities due to the increase in taxes or fees on carbon emissions. • New regulations that establish stricter limits on the generation of GHG emissions. • Possible penalties for disclosure of unverified information on climate management, under new and more robust transparency requirements. • Inability to monitor compliance with regulatory requirements and climate policies applicable to the productive sectors represented in the entities' investment portfolio.	• Implement robust mechanisms for the assessment and mitigation of legal risks related to climate change, reducing potential sanctions and litigation, and strengthening market confidence. • Prepare entities for compliance with emerging climate regulations, anticipating legal requirements on climate risk disclosure and management, which strengthens reputation and reduces legal risks. • Actively participate in the design and updating of regulatory frameworks and climate policies, contributing to the definition of sustainable financial standards and	Scenario NZE2050 calls for carbon prices >100 USD/tCO ₂ in 2030 in developed economies and later in emerging economies; increased regulatory scrutiny.	Costs: 10–20% increase in compliance expenses and reporting systems. Income: stability through access to sustainable markets. Asset exposure: high risk, in portfolio with carbon-intensive sectors.

¹¹ This exercise will be updated every 3 years, or when there are material changes that imply its updating.

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

		benefiting from derived business opportunities.		
Reputation	• Negative perception of banks by stakeholders for offering financial products that do not meet sustainability criteria, especially climate-related ones. • Loss of stakeholder confidence and negative impact on reputation associated with poor management of climate issues. • Institutional reputation is affected by exposure to carbon-intensive or vulnerable sectors due to disputes in their business activities. • Loss of attraction of new customers looking for financial institutions aligned with environmental criteria. • Exclusion of productive sectors that are part of the financing and investment portfolio of the entities, which could affect profitability or generate commercial conflicts.	• Formalize Grupo Aval's climate commitment through policies that include guidelines for the placement, capture and investment of resources in climate assets or low-emission technologies. • Participating in alliances, networks, and certifications related to sustainability strengthens corporate image and opens doors to new business opportunities. • Improve the Group's image through its ability to anticipate and manage climate risks, which helps attract investors. • Generate greater trust among customers, regulators, investors, the general public and other stakeholders by improving the transparency and quality of climate information disclosure.	Under NZE2050, reputational pressure increases and institutions without climate credentials are excluded.	Costs: Potential losses from client divestment (2–5% of portfolio at risk). Revenue: potential growth in sustainable banking (+5–10%). Asset exposure: high, in sectors such as coal, oil or cement.
Market	• Deterioration of market positioning due to the perception of inaction in the face of climate change and the lack of climate criteria in the creation of sustainable loans, which prevents the real exposure of commercial banks to climate risks from being transparently communicated. • Financial losses at the credit portfolio level due to the non-payment of companies with greater	• Design and offer financial products that comply with legal requirements and public policies related to the energy transition and emissions reduction, capturing the growing demand of responsible investors and customers. • Increase investment in diversified, resilient assets and portfolios prepared for the energy	NZE2050 reduce demand for fossil fuels by >75% by 2050; growth of renewable energies, electric mobility solutions.	Costs: impairment of carbon-exposed portfolio (risk 5–15% of additional NPLs in carbon-intensive sectors). Revenues: 20–30% increase in green products and sustainable bonds. Asset exposure: risk

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

	exposure to physical and/or transition climate risks. • Restriction of financing to companies in carbon-intensive sectors due to stricter climate regulations, which could translate into financial losses. • Losses on stock market operations arising from investments in assets or issuers, both local and international, with high carbon intensity and vulnerable to the risks associated with the transition to a low-emission economy.	transition and towards a low-carbon economy. • Increase investment and financing in low-emission sectors that represent new business opportunities. • Reduce uncertainty in decision-making processes on growth and new sustainable business models, through the strengthening of controls on climate risks.		of depreciation 15–25% of fossil fuel companies.
Technological	• Possible decrease in the bank's profitability due to an increase in loan portfolio delinquency as a result of higher operating expenses for customers associated with the adoption of new low-emission technologies. • Financing or investing in emerging technologies for the energy transition may involve high uncertainty in terms of technical feasibility, scalability and alignment with climate goals, generating financial and strategic risks for the Group. • Increase in unforeseen operating and investment costs due to the need to replace and update technological	• Increased development and use of simulation models that integrate climate and economic variables (by sector and geography) to project financial impacts to improve decision-making. • Implementation of climate scoring systems to evaluate and qualify the level of risk or climate performance associated with clients, projects or investments. • Improve the infrastructure for the generation of climate information and data, through the development of platforms that allow the evaluation of sectors, assets and geographical areas with a scientific basis and generate reports to	NZE2050 requires massive deployment of renewable energy, electrification, and emerging technologies (hydrogen, carbon capture).	Costs: Investments in IT and climate systems; 15–25% increase in CAPEX from modernization. Revenue: new climate risk analysis services (margin increase between 3–5%). Asset exposure: medium, if technological update is delayed.

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

	infrastructure if it does not meet energy efficiency and sustainability standards, required by climate regulation or market expectations.	comply with regulations on climate disclosure. • Implement measurement and monitoring tools that allow quantifying indirect emissions (scope 3) in credit or investment portfolios.		
Physical asset risk	• Reduction in the Group's ability to generate economic value, due to lower market confidence in its profitability and return on investments, as a result of exposure to extreme weather events, both chronic and acute. • Risk of operational interruption or loss of assets in the Group's entities due to the materialization of chronic and acute physical events.	• Implementation of climate resilience assessment processes applied to the company's own infrastructure to guarantee operational continuity and in the provision of digital services. • Increase financing and investment in projects that improve physical resilience to extreme weather events, such as sustainable infrastructure or adaptive technologies, reducing losses and strengthening operational continuity. • Implement improvements in energy efficiency and use of renewable energies in the facilities and own assets, reducing operating costs and carbon emissions.	Although NZE2050 mitigates long-term physical risks, extreme events continue to increase in the short and medium term.	Costs: Direct operational damages estimated at 2–5% of annual OPEX if there is no resilience. Revenue: New business in adaptation financing. Asset exposure: medium-high, in vulnerable areas (e.g. offices, data centers).

5.2.4 CLIMATE RISK ASSESSMENT

Once the climate risks and opportunities had been identified, the probability of occurrence and potential impact of each identified risk was assessed. Analysis methodologies were applied through probability and impact matrices, analysis of climate scenarios and financial valuations. Subsequently, risks and opportunities were prioritized based on materiality and their strategic impact on the business.

This assessment covers the entire value chain of Grupo Aval, as a financial holding company:

- **Upstream activities:** these include the cross-cutting formulation of corporate guidelines, policies, and strategies, as well as the supervision of the performance of the main entities. It also comprises

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

consolidated risk management, corporate governance, supplier management, and compliance with local and international regulations at the group level. Similarly, reference climate scenarios (TCNCC and IPCC) were considered.

- **Own operations:** these include the collection, management, and analysis of internal data, such as energy consumption, greenhouse gas emissions, environmental footprint, and other indicators derived from our relevant direct operations.
- **Downstream activities:** although Grupo Aval, as a holding company, does not directly deliver products or services, these activities are reflected in the management of the value generated by its subsidiaries, communication with investors, and the management of stakeholder relations at the corporate level. Also included are consolidation and financial reporting, strategic decision-making that impacts operations, and the management of exposed assets, such as the investment portfolio and loan portfolio, which reflect the group's financial and operational exposure..

5.2.4.1 PHYSICAL CLIMATE RISK ASSESSMENT

This exercise aimed to prioritize Colombia's departments based on their relative climate risk, integrating key financial variables of Grupo Aval's banking entities with the country's official climate information. This is a quantitative analysis that allows us to guide strategic decision-making in terms of risk management, sustainability and adaptation to climate change within the territorial portfolio of the Group's banking institutions.

Physical weather risks can be:

- **Acute:** are those derived from extreme and sudden weather events such as floods, hurricanes, intense storms or cyclones, among others. These events cause immediate and severe impacts on natural, social, and economic systems.
- **Chronic:** refer to the risks associated with gradual and prolonged climate changes, such as sustained temperature increases, sea level rise or water scarcity. These risks affect progressively and can generate profound and lasting alterations in ecosystems and communities.

This approach allows us to identify the territories with the highest concentration of climate risk adjusted for financial exposure, which is essential for materiality analysis and strategic prioritization processes.

5.2.4.2 TRANSITION CLIMATE RISK ASSESSMENT

Supported by the experience of climate change specialists, this assessment combined, on the one hand, the analysis of regulatory, technological, market, and behavioral changes associated with the transition to a low-carbon economy and, on the other hand, the integration of available climate data and information, in order to understand how these factors may impact the business model, customer portfolio, and investments.

Subsequently, a qualitative and quantitative analysis was carried out to estimate the probability of occurrence and the potential impact of these risks in financial and operational terms. Finally, the results

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

are incorporated into risk management and strategic planning, making it possible to anticipate future scenarios and adapt operations, as well as the product and service offer of the Group's entities, with the sustainability requirements of the market and regulators.

5.2.4.3 FINANCIAL IMPACT

The integration of the impacts caused by climate change with financial risks was done through a matrix of identification, consolidation and monitoring of prioritized climate risks.

Board 7. Matrix for consolidation and monitoring of prioritized climate risks.

Type of financial risk	Climate Risk Category	Prioritized climate risk	Transmission Channel - Cause	Impact / Probability / Timeframe	Impact on the State of Financial Position
Market. Liquidity. Operational.	Determine the risks prioritized by the Group.	Prioritized risk with impact on the Group.	Ways in which the effect of an impact on the state of the financial situation is followed.	Senior Management qualifications to prioritize climate risks.	Level of impact of climate risk on financial variables

This process allows for the design of Group-level guidelines that define a framework for climate risk appetite, including their respective tolerance margins. It also facilitates the establishment of thresholds to qualitatively categorize the financial variables associated with these risks and allows their quantification through financial modelling that reflects the magnitude of each climate risk in the financial situation of the entity. It is relevant for Grupo Aval to translate these climate R&O into terms of financial losses (at the risk level) and capitalization of opportunities to establish climate change mitigation criteria.

Financial path	Assets						
	Liabilities						
	Equity						
	Income						
	Expenses						
		Risk 1	Opportunity 2	Risk 3	Opportunity 4	Risk 5	Opportunity 6
		Climate risks					

5.3 RESULTS

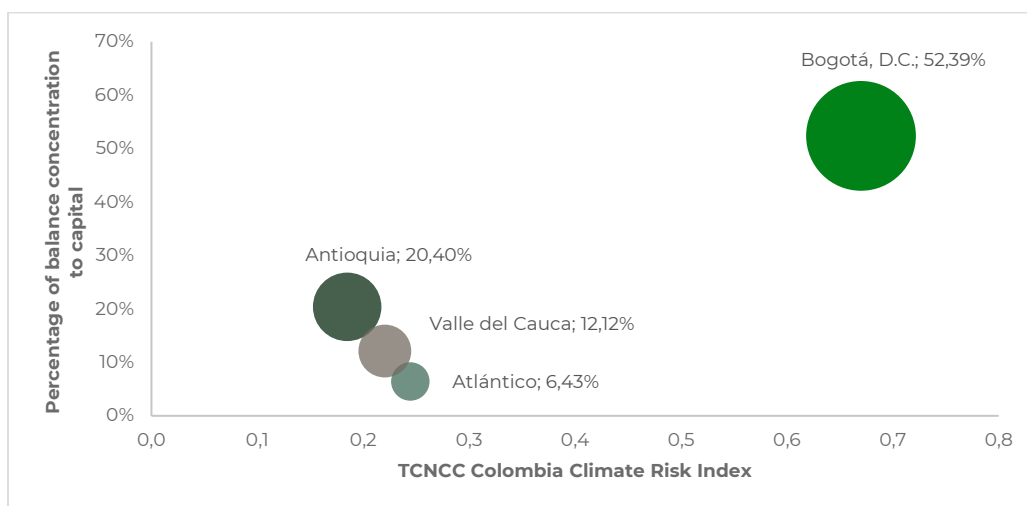
5.3.1 PHYSICAL RISK RESULTS

As a result of the physical risk analysis, the following information was obtained for each Grupo Aval business line.

In the case of banks, the capital balance of the four banks in the group was taken as a reference, finding that more than 65% is concentrated in the city of Bogotá and the departments of Antioquia, Valle del Cauca y Atlántico.

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

Illustration 6. Analysis of physical climate risks for Grupo Aval banks.



Acute and chronic physical risks were identified for each of these geographical areas with the highest portfolio concentration and the productive sectors with the highest exposure were related.

Board 8. Acute and chronic risks and exposure to productive sectors.

Acute risks	Exposed productive sectors	Chronic risks	Exposed productive sectors
Urban flooding	Housing, commerce, urban infrastructure, insurance.	Increase in urban temperature	Energy, health, housing, insurance, trade.
Slide	Social housing, road infrastructure, microcredit.	Urban water stress	Utilities, water infrastructure, industry.
Forest fires	Conservation, tourism, urban planning, real estate.	Infrastructure vulnerability	Construction, insurance, real estate projects.

Once the prioritized departments were selected, the identification and analysis of acute physical risks was carried out, using information from the Third National Communication on Climate Change of Colombia – TCNCC and the National Unit for Disaster Risk Management – UNGRD for each department. And for chronic risks, data from the TCNCC is used, taking the average of the RCP scenarios: 2.6, 4.5, 6.0, and 8.5, for the time horizons: 2011-2040, 2041-2070, and 2071-2100.

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

Board 9. Analysis of physical risks in departments where the portfolio of Aval banks is concentrated.

Department	Change in average temperature (°C)			Change in precipitation (%)		
	2011-2040	2041 - 2070	2071 - 2100	2011-2040	2041 - 2070	2071 - 2100
Bogotá	0,8	1,4	2,2	7	10	8
Antioquia	0,8	1,4	2,2	5	7	9
Valle del Cauca	0,9	1,6	2,4	7	6	6
Atlántico	1,1	1,6	2,2	-7	-10	-11

Value table – Temperature (°C)		
Change	Temperature Value Range	
Low	0 – 0,5	
Low medium	0,51 – 1	
Medium	1,1 – 1,5	
Medium high	1,51 – 2	
High	2,1 – 3,9	

Value table – Precipitation		
Change	%	
Severe deficit	<= -40	
Deficit	-39; -11	
Normal	-10; 10	
Excess	11; 39	
Severe excess	>= 40	

In the case of Corficolombiana, the physical risks that the company evaluated for each of its investments in its respective sector (agribusiness, infrastructure, hospitality, and energy and gas) were taken as reference.

Board 10. Physical risks of Corficolombiana.

Risk	Risk Description	Consequence	Impact at COP 2024	Risk level	Risk threshold	Interpretation	Sensitive sector
Heavy rains	Housing, commerce, urban infrastructure, insurance.	- Floods. - Increased.	\$163,702,500,001 to 1,000,000,000,000	Extreme	Capacity	The maximum limit of deviation has been exceeded, compared to the risk posed to its strategy.	- Infrastructure. - Energy & Gas. - Agroindustry.
Rains	Increased average annual rainfall pattern manifests itself in lower long-term temperature records both locally and globally.	- River or creek overflows. - Increased soil saturation. - Mass removal events.	\$149,000,000,001 to 1,000,000,000,000				
Increase in temperature	It manifests itself in ever-increasing long-term temperature records both locally and globally, relative to the pre-industrial average temperature.	- Forest fires. - Damage to the asphalt layer. - Increased energy consumption.	\$32,740,500,001 to \$163,702,500	High	Tolerance	Allowable deviation for compliance of the strategy that does not put the entity at excessive risk.	- Energy & Gas. - Tourism. - Infrastructure.

Finally, in Porvenir's investments, climate risk represents the possibility that weather events and changes in environmental policies will affect the performance and value of the portfolio. Porvenir carries out an assessment of the vulnerabilities at the investment level to which a portion of the managed portfolio is exposed to the risks and opportunities of climate change.

Board 11. Physical risks of Porvenir.

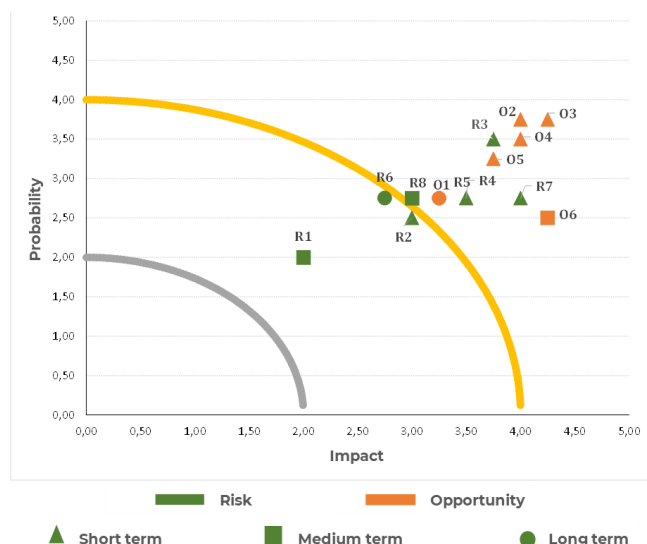
Ranking	Sector	Acute Risks	Chronic Risks
1	Real Estate	High	Medium
2	Construction	High	Medium
3	Building materials	High	High
4	Hydrocarbons	High	High

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

5.3.2 TRANSITION RISK RESULTS

A list of climate risks and opportunities that could be relevant to Grupo Aval's value creation was drawn up and then prioritized based on their potential impact on the Group's financial performance. This process was carried out with Grupo Aval's senior management, yielding the following results:

Illustration 7. Results of transition risks.



Category	Prioritized risks
Market	R7 Loss of positioning due to climate inaction.
Political	R3 Technical capability limitations for climate regulatory compliance.
Reputation	R4 Negative perception due to inconsistencies in the climate strategy.
Reputation	R5 Climate management perceived as insufficient.
Physical assets	R8 Loss of value due to the impact of extreme weather events.

Category	Prioritized opportunities
Reputational	O03 Recognition for strategic use of climate scenarios and data.
Physical assets	O6 Comprehensive management of resilience to physical risks.
Reputational	O2 Differentiation by leadership in climate transparency.
Market	O4 Resilient climate finance solutions.
Technological	O5 Strategic value for climate digital transformation.
Political	O1 Competitive advantage due to early adaptation to the climate framework.

5.4 PROCESS FOR MANAGING CLIMATE RISKS AND OPPORTUNITIES

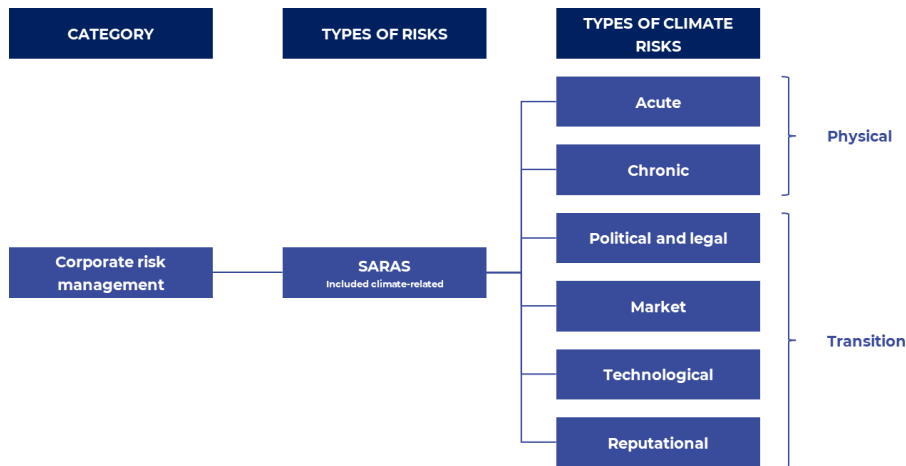
Climate risk management is integrated across the organization's overall risk management framework, ensuring that it is systematically considered in identification, assessment, monitoring, and control processes. This integration aligns the physical and transition risks arising from climate change with traditional risk categories such as credit, market, operational, and reputational risk, providing a consolidated view of the potential impacts on financial and operational stability.

Within the category of corporate risk management of Grupo Aval, which are inherent to the development of the corporate purpose of the entities that make up the Financial Conglomerate, with the management being the direct responsibility of each entity. The role of Holding is to support the definition of guidelines and monitor the risk levels defined by the Boards of Directors of the entities.

In Grupo Aval's risk taxonomy, risks related to climate change are part of the SARAS (Environmental and Social Risk Management System) typology. Its analysis is based on probability and impact criteria, identifying physical risks, which can be acute or chronic, and transitional, which include political, legal, market, technological and reputational aspects.

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

Illustration 8. Integration of climate risks into the general risk system of Grupo Aval.



Grupo Aval has established guidelines for risk management in its lines and business model, with the purpose of mitigating the impacts of climate change and its financial implications¹² on its entities, in the face of the possible materialization of physical and transition risks.

To achieve this purpose, specific actions have been defined that allow Grupo Aval to supervise, manage and apply control measures aimed, on the one hand, at mitigating the possible materialization of climate risks and, on the other, at capitalizing on climate opportunities. These actions seek to extend to the strategic levels of the organization, thus integrating climate risk management into the Group's corporate strategy.

Board 12. Actions from risk management to execute the climate strategy.

STRATEGIC FOCUS	ACTION	DETAIL OF THE ACTION
Climate Risk Management	Establish guidelines and guidelines for identification, analysis, and monitoring of climate risks.	• Grupo Aval defines guidelines for climate risk analysis. • Grupo Aval defines guidelines for the analysis of climate scenarios. • Grupo Aval periodically evaluates the transmission mechanisms for the Group's operational, market, liquidity and other financial risks based on the consolidation of the information provided by the entities. • Grupo Aval supervises and consolidates the adoption of the process of identifying climate risks and opportunities within the Environmental and Social Risk Management System (SARAS).

¹² For example, a reduction in the payment capacity of bank customers, a reduction in the value of critical financial and physical assets of portfolio operations, withdrawal of deposits and lines of credit and investment, or direct effects on the organization's processes.

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

	Establish the common methodological process for Grupo Aval Holding and its entities to establish and integrate an Internal Carbon Price (ICP) in their internal operations.	• A methodological process will be established for Grupo Aval Holding and its entities to define an Internal Carbon Price in their operations, in order to identify and manage the impact associated with their emissions and strengthen strategic decision-making. • Progressively, the ICP will also be used to assess, at the level of internal knowledge, the impact of financing and investment activities in terms of emissions, strengthening climate risk management at the corporate level.
	Assess the progressive transition in sectors with high climate risk.	• Define the level and type of climate risks that the Group is willing to assume in order to meet its strategic, financial and climate objectives. • Establish guidelines that respond to both physical risks (such as extreme events that affect assets and operations), and transition risks (regulatory, technological, and market changes linked to decarbonization). • Align with international standards and frameworks such as IFRS S2 or NGFS and articulate with the Long-Term Climate Strategy (E2050) and voluntary alignment instruments such as the Colombian Green Taxonomy (TVC). • Consider, in the climate risk appetite, the Group's commitments towards carbon neutrality and the requirements of the Financial Superintendence of Colombia (SFC) in terms of ESG risk disclosure and management.
	Incorporate into the annual audit plan the assessment of the integration of climate risk management into the overall risk management framework, in order to ensure its consistency and effectiveness.	• The purpose of the audit plan is to validate that climate risk management is integrated into the general risk management framework of Grupo Aval and its entities as established in the Climate Strategy.
	Establish processes for the identification of controls aimed at mitigating operational and business continuity risks associated with climate change, thus strengthening their resilience capacity in the face of adverse weather events.	• Draw up climate risk mitigation controls in the portfolio, promoting decisions aligned with sustainability criteria.
	Promote the adoption of technical capabilities for the adoption and compliance of the Climate Strategy at Group level.	• Promote annual training spaces that involve updates in the regulatory requirements on sustainability for the Senior Management and commercial force of the entities focused on the sustainable portfolio.
	Determine guidelines for reporting climate performance in accordance with the structure of the Group's Climate Strategy	• Implement the structure of the Climate Strategy within the organization in accordance with the provisions of IFRS S2 - TCFD. • Report to Grupo Aval on an annual basis the metrics and indicators established in compliance with the objectives and goals set at the Group level.

6. PILLARS METRICS AND GOALS

Grupo Aval has defined metrics and indicators that enable it to monitor the objectives and targets of its Climate Strategy. This information helps investors and other stakeholders understand how the organization manages risks and takes advantage of opportunities related to climate change. Monitoring these indicators provides insight into each entity's progress and the level of compliance with the commitments made. This pillar, which cuts across the other pillars of IFRS S2 (Governance, Strategy, and Risk Management), reflects the coordinated work of the areas responsible for implementing the climate strategy.

6.1 MITIGATION AND ADAPTATION STRATEGIES

Climate metrics and objectives were integrated into mitigation and adaptation strategies and plans in order to guide decision-making, monitor performance, and ensure alignment with the organization's environmental commitments. This integration allows Grupo Aval to establish a clear roadmap to reduce greenhouse gas emissions, manage climate risks and increase operational resilience, ensuring that climate actions are connected to the strategic objectives of the business.

Board 13. Mitigation and adaptation plan: metrics, indicators, goals and objectives.

Strategic focus of action	Action	Goal	Monitoring indicator or management milestone	IFRS S2-aligned metric	Responsible Area	Strategy
GOVERNANCE						
Organizational structure	Assign a Board-level officer to address climate issues.	Not applicable.	• Selection criteria for a member with a qualified profile to provide guidance on climate management in the financial sector.	Not applicable.	Corporate VP of Sustainability and Strategic Projects.	Mitigation and adaptation.
	Establish the frequency and oversight mechanisms for reporting to the Board of Directors and senior management on climate matters.	Not applicable.	• Climate strategy approved by the Board of Directors. • Regulations of the Board of Directors and its committees with oversight functions on climate matters.	• Number of meetings with the Board of Directors to discuss climate matters/year. • Number of climate reports submitted to the Board/year.	Corporate VP of Sustainability and Strategic Projects.	Mitigation and adaptation.
	Raise awareness among the Board of Directors and senior management on the importance of climate-related issues.	Not applicable.	• Board of Directors and senior management sensitized and trained on climate issues.	• Number of training courses for the Board of Directors and senior management / year. • Number of people from the Board of Directors and senior management trained.	• Corporate VP of Sustainability and Strategic Projects. • VP of Risks and Compliance.	Mitigation and adaptation.
	Design and evaluate an incentive and executive remuneration system aligned with climate and sustainability objectives.	By 2026, Grupo Aval Holding will have a designed and evaluated executive remuneration system that considers the inclusion of climate and sustainability	• Status of progress of the climate remuneration system (by phases: designed, evaluated, approved, in execution, under monitoring).	• Number of climate criteria assessed and included in the incentive scheme.	• Corporate VP of Sustainability and Strategic Projects. • VP of Risks and Compliance. • VP of Finance.	Mitigation and adaptation.

		goals as part of strategic incentives.	•Percentage of executive compensation linked to climate considerations.			
Policy	Update the ESG Corporate Policy including the climate commitment.	Not applicable.	•ESG Corporate Policy updated with the climate commitment (Climate Strategy as an annex).	•Number of updates to the annual Climate Strategy. <i>*Subject to regulatory updates, emerging, transitional risks.</i>	• Corporate VP of Sustainability Strategic Projects.	Mitigation and adaptation.
Account	Report on the management of climate issues with inputs from Climate Strategy.	Not applicable.	•Annual Climate Change Report. •Reporting of changes in material matters (quarterly).	•Disclosure of quarterly and year-end reports of the SFC. •Disclosure of information requirements of CE 04 and 031.	• Corporate VP of Sustainability Strategic Projects. • VP of Finance.	Mitigation and adaptation.
Strategic focus of action	Action	Goal	Monitoring indicator or management milestone	IFRS S2-aligned metric	Responsible Area	Strategy
STRATEGY						
Climate finance	Establish guidelines for the fulfillment of goals for the placement and attraction of green financial products, especially climate ones.	Banks: •Promote a green portfolio goal in banks by 2030 that represents 11% of the commercial portfolio. •Promote, at the Group level by 2030, a sustained market share of	•Annual green portfolio growth of ____ ^{14%} .	•Market share % = (Balance of green portfolio related to the commercial portfolio) / (Total commercial portfolio of Asobancaria). <i>*Based on the selected market growth scenario - Asobancaria.</i>	• Corporate VP of Sustainability Strategic Projects. • VP of Risks and Compliance. • VP of Finance.	Mitigation.

¹⁴ To meet the market share of the green portfolio of 20% with respect to Asobancaria's assumption that estimates 140 trillion by 2030 (a figure currently under review by the guild), the green portfolio of the Group's Commercial Banking should grow by approximately 30% per year.

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

		20% ¹³ of the green portfolio target established by Asobancaria.				
		All entities: Establish green criteria according to the use and disposition of resources from the capital market.	• Number of investments made categorized with green criteria. • Financial volume (amount (\$)) of investments made with green criteria.	Not applicable.	• Corporate VP of Sustainability and Strategic Projects. • VP of Risks and Compliance. • VP of Finance.	
Carbon Footprint Management	Carry out comprehensive management of GHG emissions in scopes 1 and 2 of Grupo Aval and its entities ¹⁵ .	Comprehensively manage scope 1 and 2 GHG emissions, prioritizing the maximum possible reduction and complementing it with capture, removal, and compensation actions. In this way, residual operational emissions are neutralized, in coherence with Colombia's climate commitments and the Paris Agreement.	• Generation of absolute GHG emissions (scope 1 and 2). • Reduction of GHG emissions (scope 1 and 2) of Grupo Aval and entities. • Removal of GHG emissions (scope 1 and 2) from Grupo Aval and entities. • Offsetting GHG emissions (scope 1 and 2) of Grupo Aval and entities. • Neutralization of GHG emissions (scope 1 and 2) of Grupo Aval and entities.	• Amount of absolute GHG emissions generated (in tCO₂e) from scopes 1 and 2. • Amount and percentage of reduced GHG emissions (in tCO₂e) of scopes 1 and 2 compared to the base year. • Amount and percentage of GHG emissions removed (in tCO₂e) from scopes 1 and 2 compared to the base year. • Amount and percentage of offset GHG emissions (in tCO₂e) of scopes 1 and 2 compared to the base year. • Amount and percentage of GHG emissions neutralized	Corporate VP of Sustainability and Strategic Projects.	Mitigation.

¹³ Currently, Grupo Aval's market share represents 20% of the total market (limited to Asobancaria), where the green portfolio as of 2024 amounted to COP 29.3 bill and Grupo Aval's to COP 5.8 trill.

¹⁵ For companies that act as holding companies and have subordinate entities, it is necessary to manage their own GHG emissions (scope 1 and 2) and promote the management of emissions from these scopes in their subordinate companies.

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

				(in tCO ₂ e) of scopes 1 and 2 compared to the base year.		
	Carry out comprehensive management for the measurement of scope 3 GHG emissions (excluding category 15), prioritizing at least the five most representative categories for the entity, and establishing reduction goals ¹⁶ .	By 2026, measure GHG emissions from the main scope 3 categories that were prioritized and defined (excluding category 15).	• Generation of absolute GHG emissions for Scope 3 categories (excluding Category 15).	• Amount of absolute GHG emissions generated (in tCO₂e) of scope 3 categories (excluding category 15). • Amount and percentage of reduced GHG emissions (in tCO₂e) of scope 3 compared to the base year. • Amount and percentage of offset GHG emissions (in tCO₂e) of scope 3 compared to the base year.	Corporate VP of Sustainability and Strategic Projects.	Mitigation.

¹⁶ Identifying the main categories to establish relevant reduction goals according to the business model.

	Consolidate decarbonization plans in all Grupo Aval Holding entities.	Ensure that, by 2026-2027, 100% of Grupo Aval's entities have plans to decarbonize their operations (scopes 1 and 2), and that these plans contemplate the establishment of progressive progress in the management and reduction of scope 3 emissions (excluding category 15 – financed emissions).	•Percentage of implemented vs. planned decarbonization initiatives. •Percentage of plans that include progressive goals for Scope 3. •Percentage of absolute reduction in GHG emissions (scope 3, excluding category 15).	•Percentage of entities with approved decarbonization plans. •Percentage of progress in implemented initiatives / entity.	•Corporate VP of Sustainability and Strategic Projects. •VP of Risks and Compliance. •VP of Finance.	Mitigation.
	Integrate strategic information on emission reduction, removal, offsetting and neutralization in the ESG reports of Grupo Aval and its entities.	From 2026, publish annually in the sustainability reports of Grupo Aval and its entities a specific section that presents: • Amount of GHG emissions reduced, removed, offset and neutralized (in tCO₂e). • Opportunities for removal and compensation projects in the medium and long term. • Impact of these actions on the fulfilment of national climate commitments	•Annual publication of the climate section with information on reduction, removal, compensation and neutralization. •Percentage of entities that report progress in reducing, removing, offsetting, and neutralizing emissions.	Not applicable.	Corporate VP of Sustainability and Strategic Projects.	Mitigation.

Climate Risk Management	Establish guidelines for the identification, analysis, and monitoring of climate risks.	By 2027, have a consolidated climate risk matrix, operational in all Grupo Aval entities, including exposure thresholds by economic sector that allows integrated reporting of exposure to physical and transition risks under different climate scenarios (NGFS/IPCC), with defined and validated response mechanisms.	•Number of entities that have risk assessment and analysis of climate scenarios.	•Percentage of the portfolio evaluated annually with climate risk criteria by entity.	•Corporate VP of Sustainability and Strategic Projects. •VP of Risks and Compliance.	Adaptation.
	Establish the common methodological process for Grupo Aval and its entities to establish and integrate an Internal Carbon Price (ICP) in their internal operations.	By 2026, 100% of Grupo Aval's entities will have integrated an ICP applied to their internal operations, in order to identify and manage the impact associated with their emissions. <i>*Progressively, this instrument will also be used to assess at the level of internal knowledge, the impact of financing and investment activities in terms of emissions, thus strengthening climate risk management at the corporate level.</i>	•Percentage of entities that have established and integrated an ICP into their internal operations.	•Percentage of entities with defined ICP. •Percentage of entities with ICPs implemented.	•Corporate VP of Sustainability and Strategic Projects. •VP of Risks and Compliance.	Mitigation.

Assess the progressive transition in sectors with high climate risk.	By 2026, Grupo Aval will have an institutional and operational framework for climate risk appetite implemented in at least 80% of the portfolios managed by its entities, with indicators and limits defined and aligned with recognized climate scenarios (NGFS, SSP, RCP 2.6).	•Percentage of entities with protocols to mitigate exposure to physical risk (acute and chronic). •Percentage of portfolios with defined climate risk appetite thresholds, assessed annually. •Percentage of exposure to climate risk vs defined limits (by type of portfolio), evaluated semi-annually.	Not applicable.	•Corporate VP of Sustainability and Strategic Projects. •VP of Risks and Compliance.	Mitigation.
Establish processes for the identification of controls aimed at mitigating operational and business continuity risks associated with climate change, thus strengthening their resilience capacity in the face of adverse weather events.	By 2026, the investment-intensive carbon portfolio must be aligned with climate sustainability criteria defined under voluntary frameworks and international and national standards (Green Taxonomy, ICMA, NGFS), and ____% of investment decisions will include risk assessment and climate scenarios.	•Grupo Aval's decarbonization roadmap. •Number of financial instruments labeled for use and disposal of resources with mitigation measures.	Not applicable.	•Corporate VP of Sustainability and Strategic Projects. •VP of Risks and Compliance.	Adaptation.
Promote the adoption of technical capabilities for the adoption and compliance of the	By 2027, have technical personnel trained in climate management, including regulatory updates.	•Number of training courses carried out in climate management, including regulatory requirements. •Number of people trained (excluding	Not applicable.	•Corporate VP of Sustainability and Strategic Projects. •VP of Risks and Compliance.	Mitigation and adaptation.

This translation from the original Spanish version is provided for convenience purposes only. No representation is made as to the accuracy of this document and the company does not assume any liability based upon it.

	Climate Strategy at Group level.		Board of Directors and Senior Management).			
	Determine guidelines for reporting climate performance in accordance with the structure of the Group's Climate Strategy.	By 2026, Grupo Aval entities report the indicators and metrics established by the Group in compliance with the climate objectives and goals.	Not applicable.	• Number of metrics or indicators reported from the Climate Strategy.	•Corporate VP of Sustainability and Strategic Projects. •VP of Risks and Compliance.	Mitigation and adaptation.
	Incorporate into the annual audit plan the assessment of the integration of climate risk management into the overall risk management framework, in order to ensure its consistency and effectiveness.	By 2027, 100% of Grupo Aval entities will have integrated climate risk management into the company's overall risk management framework.	•Execution of audits on the integration of climate risk management within the framework of the company's overall risk management.	• Number of entities that received audits.	•Corporate VP of Sustainability and Strategic Projects. •VP of Risks and Compliance.	Adaptation.