

RISK CULTURE

Grupo Aval believes that proper risk management leads to good results and strengthens the entities that make up the group. Therefore, it maintains a risk management strategy aimed at ensuring that each employee, both in the Financial Holding and its subsidiaries, understands their role in this management.

As part of strengthening our risk culture, we promote:



faced by the Financial Holding and its various entities in their business activities.

For risk management, Grupo Aval has a model that includes governance elements such as:



aimed at managing different types of risk:



and the adoption of mechanisms to monitor the risk levels to which the Financial Holding and its subsidiaries are exposed.



through the new employee onboarding program, annual reinforcement training, and knowledge evaluation for existing employees within the Holding;

In the subsidiaries, **an average of 94% of personnel received training.** Follow-up was conducted with employees who did not participate in order to validate the reasons for their absence (such as leave, medical incapacity, or vacation, among others) and to ensure, whenever possible, that the training was completed. **disabilities, vacations, among others) and to ensure, when possible, that the training was completed.**

Below are details of the risk systems, the number of employees trained, and the frequency with which messages are reinforced in the Financial Holding:

01	Information Security Risk	120 employees
02	Anti-Bribery and Anti-Corruption System	120 employees
03	Operational Risk Management	117 employees
04	Sarbanes-Oxley Act	120 employees
05	Money Laundering and Terrorist Financing Risk Management System	120 employees
06	Business Continuity	117 employees
07	Risk Management Framework	118 employees

Messages

Jun 27, 2025	
Aug 19, 2025	
Sep 26, 2025	
Oct 03, 2025	
Oct 24, 2025	
Oct 31, 2025	
	Feb 21, 2025
	Jun 06, 2025
	Jul 22, 2025
Jun 17, 2025	Aug 29, 2025
Dec 12, 2025	Sep 15, 2025
Jul 16, 2025	Oct 07, 2025
Oct 07, 2025	Dec 15, 2025
Nov 14, 2025	
Jun 17, 2025	
Dec 12, 2025	