GENERAL GUIDELINES FOR THE MANAGEMENT AND ADMINISTRATION OF CORRUPTION RISK – THIRD PARTY INTERMEDIARIES (TPIs)

1. OBJECTIVES

1.1. GENERAL OBJECTIVE

To inform Third Party Intermediaries (hereinafter TPIs) of Banco Av Villas, Grupo Aval Acciones y Valores S.A., or whoever may in the future be the parent company of Banco Av Villas and its affiliates, of the general guidelines regarding the management and administration of corruption risk.

1.2. SPECIFIC OBJECTIVES

- To promote an ethical culture in relationships with third parties through guidelines aimed at mitigating corruption risks in the process of selection, contracting, and development of contracted activities, under the principle of "Zero Tolerance."
- To provide guidelines to prevent, detect, investigate, and timely remedy practices that, if not properly addressed, could result in the occurrence of corruption events in the relationship between Banco Av Villas, Grupo Aval Acciones y Valores S.A., or whoever may in the future be the parent company of Banco Av Villas and its TPIs.

2. SCOPE

TPIs of Banco Av Villas, Grupo Aval Acciones y Valores S.A., or whoever may in the future be the parent company of Banco Av Villas.

3. REGULATORY FRAMEWORK

As a normative reference framework, Banco Av Villas, Grupo Aval Acciones y Valores S.A., or whoever may in the future be the parent company of Banco Av Villas, includes within its guidelines those described in the following national and international laws:

- Law 1778 of 2016
- International Standard ISO 37001 Anti-Bribery Management System
- Colombian Penal Code and Colombian Anti-Corruption Statute (Law 1474 of 2011)
- Foreign Corrupt Practices Act of 1977 or FCPA
- Sarbanes-Oxley Act – SOX

4. GUIDELINES

4.1. FACILITATION PAYMENTS

Banco Av Villas, Grupo Aval Acciones y Valores S.A., or whoever may in the future be the parent company of Banco Av Villas, does not accept giving or receiving payments, bonuses, fees, commissions, advances, per diems, checks, debit cards, or any other document that may be convertible into money, for the purpose of expediting processes and procedures carried out before a third party or in favor of a third party, also known as "Facilitation Payments."

Below are the general guidelines for certain special transactions:

4.2. GIVING GIFTS AND INVITATIONS BY AN EMPLOYEE TO A TPI

The giving of gifts and invitations by an employee to a TPI shall be governed by the following guidelines:

May be offered:

- Promotional or institutional items such as umbrellas, caps, pens, calendars, agendas.
- Items on special dates such as: Christmas, Valentine's Day, Secretary's Day, Children's Day, Women's Day, among others, provided they do not exceed 0.5 current legal monthly minimum wages (SMMLV) per beneficiary per calendar year.
- Invitations to events related to the ordinary course of business, such as: breakfasts, lunches, dinners, cocktails, workshops, seminars, trips, and in general activities for the demonstration of services or products, as follows:
    - a) Seminars, courses, and others such as academic or training events, provided they do not exceed two (2) days, and two (2) current legal monthly minimum wages (SMMLV) per invited person.
    - b) Invitations for breakfasts, lunches, and dinners, provided they do not exceed two (2) current legal monthly minimum wages (SMMLV), cumulative during a current year to the same beneficiary, and do not exceed four (4) events in the same year.
    - c) Invitations and tickets to entertainment events, provided they do not exceed two (2) current legal monthly minimum wages (SMMLV), cumulative during a current year to the same beneficiary, and do not exceed four (4) events in the same year.

- d) Inauguration events for works carried out by Banco Av Villas, Grupo Aval Acciones y Valores S.A., or whoever may in the future be the parent company of Banco Av Villas, in the development of its corporate purpose (e.g., roads, hotels, civil works, new bank branches).

4.3. GIVING GIFTS AND INVITATIONS BY A TPI TO AN EMPLOYEE The giving of gifts and invitations by a TPI to an employee of Banco Av Villas, Grupo Aval Acciones y Valores S.A., or whoever may in the future be the parent company of Banco Av Villas, shall be governed by the following general guidelines:

- Under no circumstances may gifts or invitations consist of money or any other cash equivalent such as vouchers, checks, debit or credit cards, securities and/or negotiable instruments.
- The gift or invitation may not exceed two current legal monthly minimum wages (SMMLV), and may not be received more than once in the same quarter from the same third party.
- Under no circumstances may the receipt of the gift or hospitality have the capacity to unduly or illegally influence the conduct of the Employee and their decision-making.
- Gifts or invitations may not be given during or within three (3) months after a negotiation. *Note: for the receipt of gifts and invitations, the same conditions of section 4.2, items a) to d), apply mutatis mutandis*.

4.4. OTHER SPECIAL OPERATIONS

If the TPI considers carrying out activities such as sponsorships, donations, public and/or political contributions on behalf of Aval, it must comply with the specific guidelines for each of these special operations.

5. AUDIT AND ANTI-BRIBERY CLAUSES

Banco Av Villas, Grupo Aval Acciones y Valores S.A., or whoever may in the future be the parent company of Banco Av Villas, reserves the right to include in contracts (or the document that serves as such) audit clauses that allow the inspection of compliance with these guidelines, as well as to include the anti-bribery clause whereby the parties declare that they are aware of and undertake to strictly comply with local and international anti-corruption provisions.

Failure to comply with the obligations described shall constitute grounds for immediate termination of the contract, without breach and without any compensation.

6. AVAL ETHICS LINE

Banco Av Villas, Grupo Aval Acciones y Valores S.A., or whoever may in the future be the parent company of Banco Av Villas, makes the AVAL ETHICS LINE available to its TPIs and other stakeholders, with the purpose of encouraging the reporting of possible breaches of the guidelines described in this document or any other behavior that goes against corporate standards.

The AVAL ETHICS LINE has been established under security parameters that guarantee the confidentiality of the information provided and protect the identity of the informant.

The ethics line is available through the website www.grupoaval.com, section Investors / About Us / Ethics Line.

7. OCCASIONAL CERTIFICATIONS

Banco Av Villas, Grupo Aval Acciones y Valores S.A., or whoever may in the future be the parent company of Banco Av Villas, may request from TPIs with whom it establishes a contractual and/or commercial relationship, certification of knowledge and compliance with the general guidelines contained in this document when required.