

Code:	TAX TRANSPARENCY POLICY	
Version: 1		
Date: 03/06/2025		

1. INTRODUCTION

The Keralty Group (hereinafter, “The Keralty Group” or “The Group”), with a national and international presence, contributes to the fulfillment of the purposes of the State, by complying with the tax regulation issued and established by the Authorities, especially considering the good practices and guidelines proposed by the Organization for Economic Co-operation and Development (OECD, as per its acronym in English), that aim to avoid the tax base erosion and profit shifting as a consequence of regulatory gaps, legal voids, or unintended gaps and mismatches between different countries’ tax systems. This is carried out through an effective and timely management of tax obligations, the support of Administrative Authorities, the commitment in preventing and reducing tax risk, while guaranteeing transparency in the information reported and applying the arm’s length principle. All those actions performed by the Group aim at contributing to the fiscal sustainability and social development of the country, by implementing the equity, efficiency and progressivity principles.

2. OBJECTIVE

This policy is established considering the social corporate responsibility framework of the Keralty Group and the sustainability of its business; though which it acknowledges its duty and commitment with its special interest groups, such as clients, collaborators, shareholders, investors, providers, allies and with society in general, by working in favor of creating shared value for the benefit of one and all. Considering the foregoing, the guidelines for the Keralty Group in tax matters will be defined below.

3. POLICY SCOPE

The scope of this policy encompasses the transactions made by the Keralty Group, and in light of the above, acknowledges the compliance of the law applicable in Colombia as well as in the other jurisdictions where it carries out its economic or business activity, cooperates with the Authorities and provides any and all necessary information.

4. LEGAL FRAMEWORK

The Keralty Group complies with the tax, customs, foreign exchange and transfer pricing regulations issued in Colombia and in other jurisdictions where the Group carries out its economic or business activity.

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5. IMPORTANT PROVISIONS

The alignment of the tax strategy was made in accordance to the mission, vision, values and corporate strategy of the Keralty Group, which means that it implies zero tolerance for the use of tax structures aimed at tax evasion.

Likewise, the tax policy is developed through means of the application of the following institutional principles, consisting of:

- 5.1 Complying with substantive and formal obligations that arise from the tax and legal relationships between the State and The Keralty Group -as a taxpayer-, with transparency and celerity regarding the payment of national and local taxes, regulatory fees and contributions, as applicable.
- 5.2 Committing to support and collaborate with the tax authorities while they carry out its legal powers, such as management, audit, investigation and collection of taxes, regulatory fees and contributions, without limiting the exercise of the right of defense and due process.
- 5.3 Safeguarding the application and compliance of the tax legislation and regulation in force, based on the auxiliary criteria for interpreting the Law (Official Doctrine and Case-law) issued by the highest authorities (regulatory authorities and Highest Courts). Additionally, the Group will have tax concepts issued by accredited tax consultancy and advisory firms; however, the Group will interpret the legislation and regulations applicable, within their spirit and purpose.
- 5.4 Identifying, evaluating, mitigating, and preventing legal, economic and institutional risk that may arise from tax matters, by implementing good legal practices that allow a proper forestalling, internal controls and training to the areas that are directly implied, with the purpose of reducing tax risk to the extent of bringing about legal and economic certainty for the Group and its shareholders.
- 5.5 Complying with the foreign exchange regime, mainly regarding the mechanisms for channeling foreign exchange transactions, and overall foreign capital investments in Colombia, international and financial investments, and investments in assets abroad.
- 5.6 Committing to follow up on the registries made before the Banco de la República (Colombian Central Bank) and to validate their congruence, through means of an annual audit process performed on the shareholder books and corporate accounting registries of the companies conforming the Keralty Group, that are subject to the

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foreign exchange regime.

- 5.7 Informing the interest groups and potential clients of the general proceedings implemented by the Group, on the matter of taxes with a greater impact and/or relevance for the Group, by means of official documents (Consolidated and Separate Financial Statements) disclosed through the Information and Communication Technologies. (ICT).
- 5.8 The Keralty Group will neither do aggressive tax planning, nor make transactions or enter business relations that may be deemed as artificial, improper, or that may lack any commercial purpose, or that do not have any purpose different than obtaining a tax advantage.
- 5.9 Ensuring full transparency in all and every transaction carried out abroad, avoiding the use of structures involving legal entities or entities located in countries with a significantly lower level of taxation (tax heavens) or that are deemed as non-cooperative jurisdictions for tax purposes. This, considering the OECD guidelines regarding transfer pricing and related matters.
- 5.10 Complying with tax regulations, considering the specific legislation issued by each country, and the OECD transfer pricing guidelines, in transactions between related parties. This, allowing a proper taxation in each jurisdiction where related parties are located, including within the Colombian free trade zones.
- 5.11 Continuing applying the transfer pricing methods on each transaction, while complying the arm's length principle. This implies the application of the method that better reflects the economic reality of each transaction, is compatible with the corporate and commercial structure, includes the best quantity and quality of the information, has the higher degree of comparability and requires a lower level of adjustment.
- 5.12 Review and apply the OECD BEPS actions (Pillars 1 and 2), including the preparation of the Country-by-Country Report (CbCR) for the entire Group and its presentation to the tax authorities, as well as the provisions related to the Alternative Global Minimum Tax, in force in each jurisdiction where the group has operations.
- 5.13 Providing the areas in charge of the internal management of the products and services offered by the Group with the relevant tax implications to avoid risk in the application of taxes related to each product or service offered or received.

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5.14 Communicating the payment of taxes to the corresponding interest groups.

5.15 Maintaining a collaborative and mutual trust relation with the tax authorities, through means of the official communication channels, in a way that allows the Group to avoid possible conflicts regarding tax and transfer pricing matters. Likewise, the Group will keep participating in cooperative compliance programs promoted by the tax authorities.

5.16 Contributing to the approach of a fair, sustainable and modern tax system for the concurrent benefit of the general interests of the countries (States).

5.17 Ultimately, the Keralty Group is committed to the implementation of good practices that allow a proper prevention and reduction of tax and reputational risk, in such a way that it promotes an economic and legal certainty for the Group and its shareholders.

5.18 This policy will be uploaded to the website of the Group, for the knowledge of the interest groups and in accordance to the tax transparency commitment made by the Group,

6 GLOSSARY

The Keralty Group: Companies or legal entities that are part of the Group in Colombia and in the other jurisdictions where it develops its economic or business activity.

7 TACK CHANGES DROP DOWN LIST / CHANGES TRACKER

Changes made to the document must be historically registered in the change tracker section, in such a way that modifications and the different versions of the document should be cumulatively included in the rows of the table below.

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Date	Change / Modification	Version
Date of approval of the version. dd/mm/aaaa	Please describe and justify the changes or modifications made to the document. If it is the first version of the document, please include " <i>First Version</i> ".	Please include the number of the latest version of the document. Version in force.

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8 APPROVAL WORKFLOW

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