

TAX POLICY

BANCO POPULAR

TABLE OF CONTENTS

1. INTRODUCTION.....	3
2. OBJECTIVE	3
3. SCOPE	3
4. GUIDELINES AND PRINCIPLES	3
4.1. Institutional Principles	4
5. APPROVAL AND PUBLICATION	5

1. INTRODUCTION

Banco Popular S.A. (hereinafter, the “Bank”), a financial institution with a nationwide presence, contributes to the fulfillment of the essential purposes of the State by fully complying with tax regulations issued by the competent authorities and by adopting sound tax practices, primarily those recommended by the Organisation for Economic Co-operation and Development (OECD).

In conducting its operations, which are carried out exclusively in Colombia, the Bank promotes responsible, ethical, and transparent tax management aimed at ensuring the timely fulfillment of its tax obligations, preventing tax-related risks, supporting administrative authorities in the performance of their duties, and contributing to the country's fiscal sustainability. Through this approach, the Bank reaffirms its commitment to the principles of equity, efficiency, and progressivity of the tax system, as well as to strengthening economic and social development.

2. OBJECTIVE

The Bank, in its commitment to its stakeholders, establishes, within the framework of corporate responsibility and sustainability, the guidelines and directives that govern its tax management, to ensure regulatory compliance, efficient tax administration, and transparency before authorities and society.

3. SCOPE

The scope of this Policy covers the Bank's operations within Colombia, including national and territorial taxes, as well as direct and indirect taxes, and ensures their proper management and compliance.

Accordingly, the Bank strictly complies with applicable Colombian legislation, cooperates with competent authorities, and provides the required information in accordance with established procedures and deadlines.

4. GUIDELINES AND PRINCIPLES

The Bank's tax strategy is aligned with its mission, vision, values, and strategic objectives. This alignment reflects the institution's commitment to tax integrity, as evidenced by a zero-tolerance policy regarding the use of tax structures intended for tax evasion. It also sets out guidelines for implementing transparent and responsible practices in fulfilling its tax obligations.

1.1. Institutional Principles

1. Comply, transparently and in a timely manner, with the obligations arising from the tax legal relationship between the State and the Bank, in its capacity as taxpayer or responsible party, ensuring the proper payment of national and territorial taxes, fees, and contributions applicable to it.
2. Fulfill the legal function of receiving and collecting tax returns and taxes, derived from its status as a financial institution legally incorporated in Colombia, subject to prior authorization and the execution of the respective agreements with national and territorial tax authorities.
3. Actively cooperate with national and territorial tax authorities in the performance of their administration, audit, investigation, and collection functions regarding applicable taxes, fees, and contributions, ensuring transparency and compliance with the applicable legal framework, without prejudice to the legitimate exercise of the rights of defense and due process.
4. Ensure the application of and compliance with the current national tax legal framework, based on doctrine, case law, and technical opinions issued by competent authorities or specialized firms, to support reasonable interpretations consistent with the purpose of the law.
5. Identify, assess, mitigate, and prevent tax-related risks through internal controls, best practices, and training programs that strengthen legal certainty and regulatory compliance.
6. Inform stakeholders about the Bank's tax payments and the general procedures implemented in tax management through the publication of Consolidated and Separate Financial Statements and other institutional disclosure mechanisms.
7. Refrain from engaging in transactions or business arrangements that may be interpreted as artificial, improper, or lacking economic purpose other than tax savings, thereby ensuring that the Bank's activities are conducted with genuine economic substance and avoiding any practice that could be considered tax abuse.

8. Avoid the use of structures, vehicles, or transactions involving entities that do not cooperate with tax authorities.
9. Comply with applicable tax regulations and the OECD Transfer Pricing Guidelines, ensuring that information reported to the parent company and transactions with related parties within the Group are conducted in accordance with the arm's length principle, accurately reflect their economic substance, and are supported by the documentation required for the consolidated analysis of the economic group.
10. Facilitate the identification and understanding of relevant tax impacts by the Bank's responsible areas, to mitigate risks associated with the application of taxes to each product or service.
11. Maintain a collaborative, technical, and mutually trusting relationship with Colombian tax authorities, actively participating in cooperative compliance programs or initiatives that strengthen tax transparency.
12. Contribute to the development of an equitable and sustainable tax system aligned with the country's general interests through responsible tax compliance and the promotion of sound tax practices within the financial sector.

5. APPROVAL AND PUBLICATION

This Policy is approved by the Board of Directors and published on the Bank's website to ensure stakeholder awareness and reaffirm the institution's commitment to transparency, ethics, and fiscal sustainability.

CHANGE LOG

Version History		
Version #	Publication date	Description of change
1	4/06/2026	A Tax Policy has been established for Banco Popular, setting forth the principles, guidelines, and directives governing tax management, with the objective of ensuring regulatory compliance, promoting efficiency in tax administration, and fostering transparency with tax authorities and society at large.