

1. OBJECTIVE

This policy establishes a corporate tax framework designed to ensure the formal and substantive compliance with all tax obligations, in strict adherence to applicable laws, decrees, case law, and regulatory provisions. It provides for the ongoing evaluation of the positions reflected in tax filings, the calculation of the Group's minimum tax rate, and transfer pricing obligations, with the objective of avoiding positions that could result in non-compliance with applicable regulations.

2. SCOPE

This policy applies to Grupo Aval and its subsidiaries in relation to tax matters involving income taxes, in accordance with IAS 12 and the applicable tax regulations in Colombia and in each jurisdiction where Grupo Aval operates through its subsidiaries.

For purposes of implementation, Grupo Aval and each subsidiary shall obtain the necessary approval from their respective governance bodies for the adoption of a policy consistent with the principles set forth herein.

3. GUIDELINES

Grupo Aval and its subsidiaries are committed to adopting best practices aimed at preventing and mitigating both fiscal and reputational risks, thereby providing greater legal and economic certainty to the organization and its shareholders.

Grupo Aval Acciones y Valores S.A.'s ("Grupo Aval") governance model is founded on a set of corporate values that place stakeholders at the center of decision-making, underpinned by a commitment to comply with the laws of each jurisdiction in which we operate. Grupo Aval contributes to society by upholding best practices of transparency, ethics, prudence, good faith, and internal controls that foster trust, stability, and the long-term sustainability of the Group.

The Corporate Governance framework of Grupo Aval and its subsidiaries is designed to ensure compliance with legal and regulatory requirements. Accordingly, this tax policy sets forth the guiding principles and minimum standards to be applied in the execution of tax-related activities, ensuring compliance with all relevant obligations and regulations.

Through this policy, Grupo Aval establishes the guiding principles for managing tax matters across its subsidiaries, including compliance with income tax obligations through timely filing of tax returns, the determination and recognition of deferred tax impacting the financial statements, and the response to regulatory authorities' requirements.

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In order to fulfill its purpose, the following guidelines are established:

- Identify and apply current tax regulations in each jurisdiction where operations take place, ensuring full compliance with all obligations.
- Apply constitutional principles, tax laws, case law, doctrine, and other auxiliary legal sources when determining tax obligations, using permissible interpretive methods, including those aligned with the spirit of the law.
- Timely file and pay all taxes due by each legal entity.
- Within the framework of legality, identify and apply tax benefits available to each entity, optimizing tax obligations through the use of exemptions, credits, and special deductions linked to qualified activities.
- Ensure compliance with the arm's-length principle in transfer pricing, guaranteeing that transactions are conducted at market value with both related and unrelated parties.
- Evaluate, before executing any transaction with tax implications, whether it complies with applicable regulations, including transfer pricing rules, preferential tax regimes, and restrictions associated with blacklisted jurisdictions.
- Ensure completeness and accuracy of reporting obligations, including jurisdiction-specific tax information, payment of tax liabilities, and any other legally required disclosures.
- Cooperate with tax authorities in response to legal requirements, providing requested information within statutory deadlines and following applicable administrative procedures.
- Engage external tax experts to support in complex tax matters, ensuring that decisions are well-researched, substantiated, and aligned with best practices.
- Periodically review tax positions taken in filings, particularly in areas where tax regulations are open to interpretation.
- Design and implement accounting policies and internal controls, both at the entity and consolidated level, to ensure that all tax-related information is accurately recorded and properly disclosed in financial and management reports.
- Support national governments and tax administrations, through industry associations, by contributing to the study and development of sector-relevant tax matters.

4. APPROVAL AND UPDATE

The Board of Directors, as the highest management body of Grupo Aval, is responsible for approving any modification to this policy and may require the management to ensure its correct compliance in the Group.

CHANGE CONTROL

PUBLICATION DATE	DATE AND MINUTES OF THE MEETING	VERSION	REASON FOR CHANGE LAST UPDATED
01-09-2025	30-07-2025	2	The structure is organized including numerals 1 "Objective", numeral 2 "Scope" and numeral 4 "Approval and Update" and the nomenclature and wording of numeral 3 are adjusted "Guidelines"