



TAX POLICY

May 2021

PREAMBLE

Grupo Nutresa S. A. and all its subsidiary companies, acting as generators of employment, impellers of the national and international economy, and being entities that interact with the community and the authorities, for social and economic purposes, and in line with its philosophy of sustainability, are aware of their commitment to the funding of the State, which translates into the timely payment of taxes and in full compliance with their tax obligations.

As in all its actions, the Grupo Empresarial Nutresa administration in tax matters is carried out with full transparency, clarity, order and coherence, always keeping in mind the responsibility it has with shareholders, employees, clients, suppliers, consumers and other stakeholders.

DEFINITION

The Grupo Empresarial Nutresa Tax Policy is an expression of responsible Corporate Citizenship, which is based on the conviction of duty to contribute to funding the State and the strict compliance of the law. This consists of a set of principles and rules that govern the formulation and implementation of our strategy in tax matters.

PRINCIPLES AND RULES FOR THE IMPLEMENTATION OF THE TAX POLICY

- **1. ETHICS:** The conduct of Grupo Empresarial Nutresa employees and executives will adhere to all the rules and customs of the highest social and corporate morals.
- **2. INTEGRITY AND GOOD FAITH:** All functions that must be fulfilled in implementing the Tax Policy, by company employees and executives, will be made with integrity and honesty, and with due diligence and care.
- **3. LEGALITY:** At all times, we will ensure compliance with the law, the Bylaws, the Code of Corporate Governance and other regulations of the companies.



- **4. RESPONSIBLE CORPORATE CITIZENSHIP**: Grupo Empresarial Nutresa rigorously observes its tax obligations and exercises its rights within the framework of the Constitution and the law.
- **5. WORLD -CLASS COMPETITIVENESS:** The Tax Policy recognizes the pursuit of competitiveness to create long \square term economic and social value.
- **6. SOCIAL RESPONSIBILITY:** This is the voluntary commitment of the companies, employees and third parties to contribute to the integral human development of the related parties (consumers, shareholders, employees, third parties, clients, suppliers, community and the State), generating economic growth, social development and environmental equilibrium.
- **7. SUSTAINABLE DEVELOPMENT:** Sustainable development frames Grupo Empresarial Nutresa's strategic objectives and corporate performance to achieve results that generate a beneficial equilibrium for all parties related to the organization: Shareholders, clients, suppliers, employees, communities and the States where Grupo Empresarial Nutresa is present. In all strategic decisions, the economic, social and environmental effect that these decisions may have must be considered, being of great importance the encouragement for employees and executives to motivate stakeholders to proceed in accordance with sustainability.

To implement the Grupo Empresarial Nutresa Tax Policy, each one of the companies that comprise it and their employees and executives will adhere to the following rules:

- 1. Observe the national laws of each one of the countries where Grupo Empresarial Nutresa is present. This compliance not only involves fulfillment of the legal provisions, but also entails respect for the spirit that gave rise to the rules, so that they may be implemented according to the intent that the legislature had at the time of creating them, without deviations that tend to obtain additional and inappropriate economic benefits.
- 2. Coordinate and approve the tax procedures of the companies that comprise Grupo Empresarial Nutresa, among themselves and with the directives given by its Parent Company Grupo Nutresa S. A.
- 3. Appropriately conserve the commercial and accounting books and documents.
- 4. Program audits that ensure transparency and compliance with tax law practices.
- 5. Establish internal controls to ensure that the information used in tax administration is complete, true, current and verifiable.
- 6. Respect corporate values.
- 7. Ensure that the employees involved in the planning, administration and implementation of tax matters act in accordance with the law.
- 8. Seek greater profitability, without incurring in tax evasion practices or those that are unethical.
- 9. Take advantage of the tax benefits granted by law, without compromising the legal performance and reputation of Grupo Empresarial Nutresa.

- 10. Execute tax strategies, figures and structures that respect the law and good business practices.
- 11. Foster good relations with the tax authorities.
- 12. Collaborate with the tax authorities, supplying them with all the information they request, clearly, precisely and completely.
- 13. Act with awareness of the social and economic function, for the community, of paying taxes.
- 14. Participate in discussions on tax matters, sponsored by union partnerships or local governments.
- 15. Pay taxes in a timely manner.
- 16. Collect and pay, in the terms of the law, the taxes to be disbursed by clients, consumers, suppliers and employees.
- 17. Align the Tax Policy with other commercial, corporate, ethical and reputational policies.
- 18. Make a logical interpretation of the tax law, in accordance with the economic, political and social context.
- 19. Implement and comply with legal regulations regarding transfer pricing, ensuring that transactions between related companies are carried out under the arm's length principle, and ensuring that they are properly applied, and ensuring that they are properly applied.
- 20. The employees of the companies are prohibited from offering or accepting bribes for the purpose of obtaining benefits in taxation.

As part of the implementation of the Tax Policy, the payment of taxes by the Grupo Empresarial Nutresa companies is done in each and every one of the geographic locations where they have been caused, so that these collections are reflected in the territories in which Grupo Empresarial Nutresa is commercially present.

Transparency governs this Policy; this is evidenced in the publications and reports that are made to the authorities on compliance with the tax obligations. These communications are done in a timely manner, in a way that is understandable, clear and easy to interpret, faithfully reflecting the tax behavior of the companies involved.

In turn, in designing tax schemes, we completely rule out the improper use of tax havens or corporate structures that are not ethical or transparent, in the same way that we do not constitute, in the fiscal havens or corporate structures, affiliates or subsidiaries in order to obtain undue benefits in economic and tax matters.

Complementing the above, when any of the Grupo Empresarial Nutresa companies conduct negotiations with the Government of a country where it operates, to obtain tax exemptions, we do not use our position in the market to achieve unfair or unreasonable results, ensuring that the contracts

VERIFICATION OF COMPLIANCE WITH TAX POLICY

The Grupo Nutresa S.A. Board of Directors will be responsible for approving and modifying this policy. Likewise, it will ensure compliance with it in all the companies that are part of Grupo Empresarial Nutresa.