

February 2025

Main recurring corporate, tax and labor obligations

First Semester of 2025

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I. Annual shareholders' meeting

At least one annual shareholders' meeting must be held every calendar year, in the first three months following the end of the previous fiscal year. So this year's annual shareholders' meeting must be held by March 31, 2025.

Points to note:

- Before the meeting, companies will need to have drawn up financial statements as of December 31, 2024, together with a report prepared by the management (Board of Directors and legal representative, as applicable) and a recommended profits distribution project, so that they can be reviewed and assessed at the meeting.
- The meeting notice must be sent with the advance notice set out in the bylaws. Unless they provide for a longer time period, the meeting notice must be sent at least 15 business days in advance or, for simplified stock companies (*sociedades por acciones simplificadas*), 5 business days in advance, not including the date of the notice nor the date of the meeting. It must be guaranteed that the shareholders can exercise their rights to examine documents during this period.
- In the absence of a meeting notice, the the shareholders' assembly may meet by its own right on the first business day of April (in 2025, Tuesday April 1), at 10:00 a.m. at the corporate headquarters located at the company's registered office.
- A prior notice will not be needed if all the shareholders are present in the meeting, all shares are represented, and unanimously decide to hold the annual shareholders' meeting, provided they have all the documents needed for the meeting.

II. Obligation to appoint an auditor

All corporations (*sociedades anónimas*), branches of a foreign company and partnerships limited by shares (*sociedades en comandita por acciones*) are required to appoint an statutory auditor since they are formed.

Limited liability companies (*sociedades de responsabilidad limitada*) and simplified stock companies (*sociedades por acciones simplificadas*) are required to audit their financial statements if, by reference to the information reported in their accounting records as of December 31, 2024, they are required to appoint an auditor. Under Law 43 of 1990, for these types of companies an auditor must be appointed in any of the following events: (i) if their gross assets as of December 31, 2024 were equal to or higher than 5,000 legal minimum monthly wages (SMLMV) in force (for 2025, COP\$ 7,117,500.000, approximately US\$ 1,694,642 -a sum calculated by reference to the legal monthly minimum wage figure for 2025 (COP\$ 1,423,500), and which is used to determine the need to appoint an auditor in 2025) and/or (ii) if their gross revenues in 2024 were equal to or higher than 3,000 legal minimum monthly wages in force (COP\$ 4,270,500,000, approximately US\$ 1,016,785).

This obligation needs especially attention considering it may affect the validity of tax returns filed by companies.

The obligation arises on the approval of the financial statements, and in any case, by April 1, 2025.

III. Surveillance by the Superintendence of Superintendence of Companies

Two of the main grounds for surveillance by the Superintendence of Superintendence of Companies, as set out in Decree 1074 of 2015, are based on assets and revenues. On the basis of those grounds, companies not subject to surveillance by another authority will come under surveillance by the Superintendence of Companies', if as of year-end, they record:

- Total assets higher than 789,390.6 tax value units (UVT), equal to COP\$ 39,310,862,489.4, approximately US\$ 9,359,729- a sum calculated by reference to the tax value unit for 2025 (COP\$ 49,799)- Superintendence of Companies, as provided for in article 32 of Decree 2642 of 2022.

- Total revenues, higher than 789,390.6 tax value units, equal to COP\$ \$39,310,862,489.4, approximately US\$ 9,359,729- a sum calculated by reference to the tax value unit figure for 2025 (COP\$49,799)- Superintendence of Companies, as provided for in article 32 of Decree 2642 of 2022.

It is important to note that there are other grounds for surveillance which apply in specific scenarios, such as having responsibility for pensioners under certain circumstances, and in cases of restructuring agreements, or control or business group scenarios, under certain circumstances, among others. These grounds for surveillance and the circumstances making surveillance applicable are set out in Decree 1074 of 2015.

The effects of falling within the grounds for surveillance are:

- Filing certified financial statements and an auditors' report every year, together with the additional documents laid down each year in a circular issued by the Superintendence of Companies.
- Paying the applicable fee to the Superintendence of Companies that is determined each year.
- Applying to the Superintendence of Companies authorization to:
 - a. Formalize bylaws amendments such as for a merger or spin-off if they are not subject to the general authorization regime.
 - b. Obtain approval of the financial statement for an inventory of company assets in voluntary winding-up processes.
 - c. Issue shares with preferred dividends and no voting rights, and place preferred shares.
 - d. Carry out private bond issues.
 - e. Sending any information required from time to time by the relevant departments.

IV. Filing of Report 42 - Business Practices

In Circular No 100-000003 of September 11, 2023, the Superintendence of Companies sets out the time limit and minimum requirements for filing Report 42- Business Practices, which is required for obliged entities as defined in the circular: entities subject to oversight and control by the Superintendence of Companies, except for:

- a. Branches of foreign companies.
- b. Companies under simplified judicial winding-up.
- c. Companies under mandatory winding-up.
- d. Companies under judicial winding-up.
- e. Companies under voluntary winding-up.
- f. Companies under reorganization.
- g. Companies under short-form reorganization (*reorganización abreviada*).
- h. Companies under restructuring.
- i. Companies under insolvency proceedings.
- j. Companies that do not meet the ongoing concern principle as of December 31, 2024.
- k. Tier 3 Companies - IAS for companies applying simplified accounting standards.

Therefore, the report has to be sent every year within the time limits described below based on the last two digits of the tax identification number (not including the verification digit):

Last two digits of tax identification number	Time limit for sending information for 2025
01 – 10	July 1, 2025
11 – 20	July 2, 2025
21 – 30	July 3, 2025
31 – 40	July 4, 2025
41 – 50	July 7, 2025
51 – 60	July 8, 2025
61 – 70	July 9, 2025
71 – 80	July 10, 2025
81 – 90	July 11, 2025
91 – 00	July 14, 2025

V. Obligation to implement an AML risk self-monitoring and management system

Under Chapter X of the External Basic Legal Circular issued by the Superintendence of Companies, as amended by External Circular 100-000016 of December 24, 2020, External Circular No 100-00004 of April 9, 2021 and External Circular No 100-000015 of September 24, 2021, any company or branch of a foreign company which, as of December 31 of the immediately preceding year, fulfills the requirements determined in earlier circulars, will have to design and implement an AML risk self-monitoring and management system (a system for monitoring and managing the risk of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction), or fulfill the rules on minimum measures for certain sectors.

The legal representative is responsible for the design and implementation of the risk manual, who must submit it to the board of directors or, if the company does not have such corporate body, to the shareholders' assembly, for approval, which must be recorded in the minutes of the annual meeting. The recommendations given by the Superintendence of Companies in the Basic Legal Circular will have to be considered.

As provided in Chapter 10 of the External Basic Legal Circular issued by the Superintendence of Companies, the time limit for implementing an AML risk self-monitoring and management system ends on May 31 in the year following the year when the requirements determined in the circulars mentioned above are fulfilled.

VI. Adoption of transparency and business ethics programs

Under External Circular No 100-000011 of August 9, 2021 issued by the Superintendence of Companies and article 25 of Law 2195 of 2022, any company or branch of a foreign company which in the immediately preceding year fulfilled the requirements determined by such circular will be required to adopt a transparency and business ethics program (PTEE), by May 31 of the year following the year the requirements determined in those circulars are fulfilled.

VII. Filing of Report 75 – AML Risk Self-Monitoring and Management System and Transparency and Business Ethics (PTEE) Programs

As provided in Circular No 100-000003 of September 11, 2023, Report 50 - AML Risk Self-Monitoring and Management System and Report 52 - Transparency and Business Ethics Programs (PTEE) were rolled into Report 75 - AML Risk Self-Monitoring and Management System and Business Ethics Programs (PTEE), and therefore

entities obliged to implement an AML risk self-monitoring and management system or transparency and business ethics (PTEE) programs will have to prepare and file the report annually within the time limits described below, based on the last two digits of the tax identification number (not including the verification digit):

Last two digits of tax identification number	Time limit for sending information for 2025
01 – 10	July 15, 2025
11 – 20	July 16, 2025
21 – 30	July 17, 2025
31 – 40	July 18, 2025
41 – 50	July 21, 2025
51 – 60	July 22, 2025
61 – 70	July 23, 2025
71 – 80	July 24, 2025
81 – 90	July 25, 2025
91 – 00	July 28, 2025

VIII. Filing of Report 58 (AML and Transparency and Business Ethics Compliance Officers)

The report of change of compliance officer, by entities required to implement an AML risk self-monitoring and management system or a transparency and business ethics (PTEE) program will have to be completed and sent within fifteen business days following that appointment or change.

This report must be accompanied by the following documents where it relates to the AML risk self-monitoring and management system: (i) the compliance officer's academic and employment history certificate (*hoja de vida*); (ii) a certificate of fulfillment of the requirements to be appointed as compliance officer; (iii) a copy of the document recording the registration of the compliance officer on the online reporting system (SIREL) managed by the Information and Financial Analysis Unit (UIAF); (iv) a copy of the extract of the board of directors or shareholders' meeting approving the designation of the compliance officer; (v) a document evidencing the risk management know-how in connection with AML risks as a result of specialized skills, having attended courses, diplomas, seminars, conferences or received any other similar training; and (vi) a certificate confirming the absence of any disqualification or incompatibility relating to the compliance officer.

Where it relates to transparency and business ethics (PTEE) programs: (i) the compliance officer's academic and employment history certificate (*hoja de vida*); (ii) a certificate of fulfillment of the requirements to be appointed as compliance officer; (iii) documents evidencing risk management know-how; (iv) a copy of the minutes of the board of directors or shareholders' meeting approving the designation of the compliance officer; and (v) a certificate confirming the absence of any disqualification or incompatibility relating to the compliance officer signed by the legal representative.

IX. Renewal of registration at the commercial registry

Companies, branches of a foreign company, not-for-profit entities and commercial establishments are required to renew their registration at the commercial registry. This renewal must be done within the first three months of the year, at the chamber of commerce for the entity's or the establishment's registered office by filing the form required for these purposes by the corresponding chamber of commerce. To be able to carry out the renewal, financial information is required as of December 31, 2024, duly approved by the shareholders' assembly.

Companies, branches of a foreign company and not-for-profit entities in winding-up process, are not required to renew their registration at the commercial registry.

X. Renewal of registration on the Single Bidders Register

Companies and branches of a foreign company registered on the Single Bidders Register (RUP), will have to renew their registration with the corresponding chamber of commerce, which must be completed by the fifth business day in April (for 2025, Friday, April 7, 2025). To be able to carry the renewal, financial information is required as of December 31, 2024, duly approved by the shareholders' assembly. Interested parties will have to complete the forms by providing information on the company's size, financial position, compliance with labor and employment rules, legal capacity, organizational capacity and experience. Information related to the company's experience and legal capacity may be amended at any time.

XI. Update of registration on the Colombian Tourism Register

Tourism service providers have to renew, within the first three months of the year, registration on the Colombian Tourism Register (RNT) of the tourism service provider and of each of their registered trading establishments.

XII. Registration of websites at the commercial registry

The websites that have to be registered at the commercial registry are websites of Colombian origin, on which an economic activity - whether trading, financial or services - is performed directly. The activity performed on the website or online site to be registered has to be a trading, financial or services economic activity.

Registrations must be made at the commercial registry of the registered office of the company owning the domain. Applications for registration must be filed with the commercial registry within a month following the date on which it was made available to the public.

XIII. Filing of financial statements with the commercial registry

Every trading company, whatever its size or number of assets, has to file with the commercial registry of its registered office, a copy of its general-purpose financial statements, together with the related notes and auditor's report, if applicable, within a month following the date they are approved by the shareholders' assembly.

However, companies required to send their financial statements to the Superintendence of Companies do not have to send their financial statements to the commercial registry.

XIV. Submission of financial statements to the Superintendence of Companies

All companies and branches of a foreign company which fall under the surveillance and control of the Superintendence of Companies, together with any that are under inspection by such authority and which receive a request under an individual administrative decision, have to submit to said authority a copy of their financial statements as of December 31 of the previous year, presented in thousands of Colombian pesos and duly approved.

This obligation does not apply for inspected entities undergoing a voluntary winding-up process, or for any that fail to fulfill the ongoing concern assumption as of December 31, 2024, which will have to be notified by email to webmaster@supersociedades.gov.co within the time limit specified for reporting its information.

The information¹ must be sent on magnetic media as provided in the circular issued yearly by the Superintendence of Companies. For 2025, according to External Circular no 100-000009 of November 2, 2023, and Notice 2024-01-89934 from the Superintendence of Companies, the time limits for filing information are as follows:

¹ In addition to the submission of the financial statements, the additional information established in Circular No. 100-000009 of November 2, 2023, must be submitted within two (2) business days following the respective deadline. Furthermore, the copy of the extract from the meeting minutes in which the 2024 Financial Statements and the management report were approved or disapproved must be submitted no later than May 31, 2025.

General-purpose financial statements, certificates and auditor's reports: These must be sent within the following time limits, based on the last two digits of the company's tax identification number, not including the verification digit:

Last two digits of tax identification number	Time limit for sending information
01-05	April 8, 2025
06-10	April 9, 2025
11-15	April 10, 2025
16-20	April 11, 2025
21-25	April 21, 2025
26-30	April 22, 2025
31-35	April 23, 2025
36-40	April 24, 2025
41-45	April 25, 2025
51-55	April 29, 2025
56-60	April 30, 2025
61-65	May 2, 2025
66-70	May 5, 2025
71-75	May 6, 2025
76-80	May 7, 2025
81-85	May 8, 2025
86-90	May 9, 2025
91-95	May 12, 2025
96-00	May 13, 2025

Consolidated financial statements: By May 31, 2025. This time limit is not extendible.

Points to note:

- Companies which have never filed reports with the Superintendence of Companies have to send an email to efinancieros@supersociedades.gov.co providing the tax identification numbers, company name, names and positions of their legal representatives or officers and the reason for which information will be reported before the Superintendence of Companies to authorize the delivery of the financial information required in this circular, as provided in Circular No 100-000012 of November 22, 2022 issued by the Superintendence of Companies.
- Entities under surveillance or control which are in a voluntary winding-up process, as well as failing on the ongoing concern assumption, will have to follow the instructions contained in External Circular 100-000009 of November 2, 2023, and in External Circular No 100-000006 of November 9, 2018 issued by the Superintendence of Companies.

XV. Filing of foreign exchange information

Filing information on compensation accounts

Under External Regulatory Circular DCIP-83 issued by the Colombian central bank (*Banco de la República*), any individuals or legal entities owning foreign currency bank accounts which they use as a compensation mechanism

have to file monthly, on the Foreign Exchange Information System, a report of movements in the netting account, in which they have to disclose the movements or absence of movements in their netting accounts registered.

Report of foreign exchange information to the Colombian tax and customs office (DIAN)

The owners of netting accounts must report exogenous foreign exchange information to DIAN relating to the fourth quarter (movements in October, November and December) of 2023 and the first quarter (movements in January, February and March), second quarter (April, May and June) and third quarter (July, August and September) of 2024 within six months following the date the software and the .XML file formats that will be certified by DIAN become available. The software has not yet become available, which is why this obligation has been suspended.

XVI. Time limits for filing tax returns

Before looking at the tax return dates, it is important to mention that Law 2277 of 2022 adopting a new tax reform in Colombia is in force for 2023 and later years. Its amendments, which are described generally in [this publication](#), include the implementation of a minimum tax rate for legal entities, inclusion of income from dividends and shares for determining the general income category of individuals, creation of surtaxes in the extractive and energy industries, changes to the rates for the tax on dividends, permanent adoption of a wealth tax and inclusion of a new health tax and tax on single-use plastics.

The new legislation introduced by Law 2277 of 2022 includes the “significant economic presence” principle, which comes into effect in 2024 and may have important implications for foreign companies with revenues above 31,000 tax value units (COP\$ 1,543,769,000 for 2025, approximately US\$ 367,564) -a sum calculated by reference to the tax value unit figure for 2025 (COP\$ 49,799-) coming from the sale of goods and/or services to customers and users in Colombia. Businesses with a significant economic presence could be required to make income tax prepayments every two months, irrespective of their tax identification number, within the time limits determined in Decree 2229 of 2023.

Set out below are the due dates for the main countrywide and local taxes in the first six months of the year:

1. Time limits for reporting and paying income and complementary taxes, and prepayments

1.1. Large taxpayers

As provided in Decree 2229 of December 22, 2023, legal entities qualifying as large taxpayers must make the first income tax payment as described below, based on the last digit of the tax identification number (NIT):

Last digit of tax identification number	First tax payment deadline	Return and second tax payment deadline	Third tax payment deadline
1	February 11, 2025	April 9, 2025	June 11, 2025
2	February 12, 2025	April 10, 2025	June 12, 2025
3	February 13, 2025	April 11, 2025	June 13, 2025
4	February 14, 2025	April 14, 2025	June 16, 2025
5	February 17, 2025	April 15, 2025	June 17, 2025
6	February 18, 2025	April 16, 2025	June 28, 2025
7	February 19, 2025	April 21, 2025	June 19, 2025
8	February 20, 2025	April 22, 2025	June 20, 2025
9	February 21, 2025	April 23, 2025	June 24, 2025
0	February 24, 2025	April 24, 2025	June 24, 2025

Points to note:

- The value of the first tax payment cannot be below 20% of the amount payable in tax year 2023.
- Article 240 of the Tax Code (in paragraph 2 included by Law 2227 of 2022) determines a surtax for financial institutions, insurance and reinsurance companies, and commission agents in the securities market for the period between 2023 and 2027 where they obtain taxable income higher than COP\$ 5,647,800,000 (approximately US\$ 1,344,714). According to that article, the surtax must be paid via a prepayment equal to an estimate of the whole amount, calculated by reference to the taxable income for income tax purposes that the taxpayer used to assess that tax for the immediately preceding tax year. The prepayment of the surtax on financial institutions classed as large taxpayers has to be made in two equal installments: the first between April 9 and April 22, and the second between June 10 and June 23, 2025, based on the last digit of the taxpayer's tax identification number, as provided in Decree 2229 of 2023.
- Article 240 of the Tax Code (in paragraph 3 added by Law 2227 of 2022) determines a surtax for domestic companies and their equivalent types of companies (*sociedades asimiladas*), permanent establishments of foreign companies and foreign legal entities resident or otherwise in the country of the extractive, oil or coal industry. Depending on their activity and the average price in the year, the surtax ranges between 0% and 15%. The additional percentage points must be added to the general income tax rate.

1.2. Legal entities and other taxpayers

The time limits for filing income tax returns and paying in two equal installments for legal entities and taxable persons not classed as large taxpayers will be in May for filing the return and paying the first installment, and in July for paying the second. The dates for the return and payment of the first installment are determined based on the last digit of the tax identification number of the maker of the return, as set out below:

First installment payment

Last two digits of tax identification number	Deadline
1	May 12, 2025
2	May 13, 2025
3	May 14, 2025
4	May 15, 2025
5	May 16, 2025
6	May 19, 2025
7	May 20, 2025
8	May 21, 2025
9	May 22, 2025
0	May 23, 2025

Second installment payment

Last two digits of tax identification number	Deadline
1	July 9, 2025
2	July 10, 2025
3	July 11, 2025
4	July 14, 2025
5	July 15, 2025
6	July 16, 2025
7	July 17, 2025
8	July 18, 2025
9	July 21, 2025
0	July 22, 2025

2. Withholdings at source

Withholding agents for income and complementary taxes and/or stamp tax, and/or sales tax, and/or the tax on arbitration awards must report and pay withholdings and self-withholdings made monthly, on the following dates in the first six months of the year:

Last digit of tax identification number	January (December period)	February (January period)
1	February 11, 2025	March 11, 2025
2	February 12, 2025	March 12, 2025
3	February 13, 2025	March 13, 2025
4	February 14, 2025	March 14, 2025
5	February 17, 2025	March 17, 2025
6	February 18, 2025	March 18, 2025
7	February 19, 2025	March 19, 2025
8	February 20, 2025	March 20, 2025
9	February 21, 2025	March 21, 2025
0	February 24, 2025	March 25, 2025

Last digit of tax identification number	March (February period)	April (March period)	May (April period)
1	April 9, 2025	May 12, 2025	June 11, 2025
2	April 10, 2025	May 13, 2025	June 12, 2025
3	April 11, 2025	May 14, 2025	June 13, 2025
4	April 14, 2025	May 15, 2025	June 16, 2025
5	April 15, 2025	May 16, 2025	June 17, 2025
6	April 16, 2025	May 19, 2025	June 18, 2025
7	April 21, 2025	May 20, 2025	June 19, 2025
8	April 22, 2025	May 21, 2025	June 20, 2025
9	April 23, 2025	May 22, 2025	June 24, 2025
0	April 24, 2025	May 23, 2025	June 25, 2025

3. Sales tax

3.1. For entities required to report and pay every two months:

Time limit for the last two-month period of 2024:

Last digit of tax identification number	November - December two-month period
1	January 13, 2025
2	January 14, 2025
3	January 15, 2025
4	January 16, 2025
5	January 17, 2025
6	January 20, 2025
7	January 21, 2025
8	January 22, 2025
9	January 23, 2025
0	January 24, 2025

Time limits for the first two-month periods of 2025:

Last digit of tax identification number	January – February two-month period (deadline)	March - April two-month period (deadline)	May – June (deadline)
1	March 11, 2025	May 12, 2025	July 9, 2025
2	March 12, 2025	May 13, 2025	July 10, 2025
3	March 13, 2025	May 14, 2025	July 11, 2025
4	March 14, 2025	May 15, 2025	July 14, 2025
5	March 17, 2025	May 16, 2025	July 15, 2025
6	March 18, 2025	May 19, 2025	July 16, 2025
7	March 19, 2025	May 20, 2025	July 17, 2025
8	March 20, 2025	May 21, 2025	July 18, 2025
9	March 21, 2025	May 22, 2025	July 21, 2025
0	March 25, 2025	May 23, 2025	July 22, 2025

3.2. For entities required to report and pay every four months:

The time limits for filing and paying this tax every four months will be in May 2025, September 2025 and January 2026. The dates for the period comprising the first six months of 2025 are as follows:

Last digit of tax identification number	January – April (deadline)	May – August (deadline)
1	May 12, 2025	September 9, 2025
2	May 13, 2025	September 10, 2025
3	May 14, 2025	September 11, 2025
4	May 15, 2025	September 12, 2025
5	May 16, 2025	September 15, 2025
6	May 19, 2025	September 16, 2025
7	May 20, 2025	September 17, 2025
8	May 21, 2025	September 18, 2025
9	May 22, 2025	September 19, 2025
0	May 23, 2025	September 22, 2025

Points to note:

- For service providers from other countries, the time limit for filing the sales tax return – VAT for the first two-month period of 2025 will end on March 14, 2025.

4. Industry and trade tax (ICA) – Bogotá**4.1. Industry and trade tax (ICA) for tax year 2024 - Bogotá**

- Industry and trade tax, standard regime – payable every two months (last two-month period in 2024: February 21, 2025)
- Industry and trade tax, standard regime – first two-month period in 2025: April 4, 2025
- Industry and trade tax, standard regime – second two-month period in 2025: June 13, 2025
- Industry and trade tax, standard regime – annual return. Any taxpayers whose tax liability in 2024 did not exceed 391 tax value units (COP \$18,402,415) - a sum calculated by reference to the tax value unit figure for 2024 (COP\$ 47,065, approximately US\$ 4,381) must file a single tax return by February 28, 2025.
- Industry and trade taxpayers belonging to the preferential regime will be required to file a single annual return for tax year 2024, by February 28, 2025.

4.2. Industry and trade tax withholdings at source (RetelCA) – Bogotá

- Time limit for filing returns for industry and trade tax withholdings at source for the last two-month period in 2024: January 17, 2025
- Time limit for filing returns for industry and trade tax withholdings at source for the first two-month period in 2025: March 21, 2025

Points to note:

- Due to being a municipal tax, the filing, reporting and payment dates for the industry and trade tax vary depending on the municipality where the taxable activity is carried out.
- For Bogotá city, the two-monthly industry and trade tax time limits for taxpayers under the standard regime, and for withholding agents in respect of 2024, will end in or after April and we will include them in our next issue.

5. Real estate tax

Real estate tax for 2025 has to be reported and paid by July 11, 2025, and if it is paid by April 25, 2025, the taxable person will be entitled to a 10% discount calculated on the amount payable.

6. National tax on consumption, plastic bags and cannabis consumption

On the same dates as for the two monthly sales tax.

7. Tax on single-use plastics used for packaging, wrapping or packing

Filed and paid annually: February 14, 2025, irrespective of the tax identification number.

8. Tax on sugary drinks and ultraprocessed foods and/or foods with high levels of added sugar, salt or saturated fats

The filing and payment time limits for this tax will be every two months between March 2025 and January 2026. The dates for taxable periods in 2025 are as follows:

Taxable period	Deadline
January - February	March 14, 2025
March - April	May 15, 2025
May - June	July 14, 2025
July - August	September 12, 2025
September - October	November 18, 2025
November - December	January 16, 2026

9. Wealth tax

Wealth tax is paid in two installments. The first installment must be reported and paid in May, as described below:

First installment payment

Last digit of tax identification number	Deadline
1	May 12, 2025
2	May 13, 2025
3	May 14, 2025
4	May 15, 2025
5	May 16, 2025
6	May 19, 2025
7	May 20, 2025
8	May 21, 2025
9	May 22, 2025
0	May 23, 2025

The second installment must be paid by September 12, 2025

XVII. Update of information on the Colombian Database Register

Under Decree 090 of 2018 and Circular 003 of 2018, issued by the Superintendence of Industry and Commerce, the parties required to comply with the Colombian Database Register (RNBD) and update the information it contains are not-for-profit, companies and entities that have total assets above 100,000 tax value units (for 2025, COP\$ 4,979,900,000 -a sum calculated by reference to the tax value unit figure for 2025 (COP\$ 49,799)-, approximately US\$ 1,185,690).

Points to note:

- The Colombian Database Register (RNBD) must be updated within the first ten business days in the month following the date on which material changes takes place. Material changes means any related to: (i) the purpose of the databases, (ii) controllers (i.e., the individual who supervises and makes decisions about a database) and processors (i.e., third persons, service providers usually, that the controller commissions to process personal data, on their behalf and in their interest), (iii) channels for data subject services, (iv) classification or types of stored personal data, (v) information security measures, (vi) the controller's data processing policy, and (vii) international transfers of data.
- The information contained on the Colombian Database Register must also be updated annually between January 2 and March 31 each year. In this period, at least the information related to the number of data subjects must be updated.
- Additionally, in the first fifteen days of February and August of each year following their registration, controllers must update the information on complaints filed by data subjects.

XVIII. Employer's obligations in the first semester of 2025

Obligation	Applicable date
Increase to the legal monthly minimum wage in force (SMLMV)	On or after January 1, 2025: <ul style="list-style-type: none"> ■ Legal monthly minimum wage in force (SMLMV): COP\$ 1,423,500 ■ Complete minimum wage (<i>salario mínimo integral</i>): COP\$ 18,505,500
Increase to public transport subsidy	On or after January 1, 2025 <ul style="list-style-type: none"> ■ Public transport subsidy: COP\$ 200,000
Payment of interest on severance pay funds of 2024	January 31, 2025
Payment by employers of employees' contributions to their severance pay funds (<i>cesantías</i>) of 2024	February 14, 2025
Report of changes in the headcount filed with the Colombian Education and Training Service (SENA)	<p>If the employer chooses to create reports in January and July, it will have to send the information in the first 10 business days in January 2025, to report the change in headcount between July and December 2024.</p> <p>If the employer chooses to create reports in March and September, it will have to send the information in the first 10 business days in March 2025, to report the change in headcount between September 2024 and February 2025.</p>
Annual reporting on the minimum standards self-assessment and the Plan for Improvement of the Occupational Health and Safety Management System	<p>The information must be submitted by January 31, 2025 using the software designed by the Ministry of Labor, which can be accessed at: https://sgri.mintrabajo.gov.co/Autenticacion/Autenticacion</p> <p>At this juncture, the Ministry of Labor has not extended the term for submission of the information.</p>

Obligation	Applicable date
Submission of the payment and withholdings certificate	By March 31, 2025
Delivery of supplied workwear: a pair of shoes and a work garment	By April 30, 2025
Payment of the statutory employee bonus	By June 30, 2025
Six monthly family day - only for employers who have not voluntarily elected a reduction of working hours to 42 hours a week-	The family day for the first six months of the year must be arranged
Lowering of working hours	The statutory number of working hours for the period between July 15, 2024, and July 14, 2025 is 46 hours a week. The statutory working hours will be 44 hours a week starting in July 15, 2025.

GENERAL DISCLAIMER:

The present document is solely for informational purposes and is not intended to advise on specific legal or regulatory obligations. Therefore, it is the responsibility of each recipient to determine whether the obligations and procedures mentioned in this document apply to them, as well as any other obligations that may apply and are not covered in this informational document.

Unless expressly instructed otherwise, Garrigues is not responsible for undertaking the actions outlined in this circular. For specialized advice, our team of experts is available to assist with any questions you may have.

For further information, please contact your usual contact at Garrigues, or Andrés Ordoñez Rizo, head of the Mergers and Acquisitions and Corporate Law department; Camilo Zarama or Mónica Bolaños, heads of the Tax department; or Carolina Camacho, head of the Labor department.



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