



**GRUPO NUTRESA — NUTRESA BUSINESS GROUP
ANTI-FRAUD, ANTI-CORRUPTION AND ANTI-BRIBERY POLICY**

GENERAL INFORMATION					
PEOPLE IN CHARGE					
DEFINED BY:			AUTHORIZED BY:		
NAME: Sol Beatriz Arango M. Damaris Bibiana Giraldo M. Jairo González G. Carlos Uriel Gómez M. Alejandro Leyva L.			NAME: Servicios Nutresa Directive Committee Grupo Nutresa S.A. Board of Directors		
POSITION: Servicios Nutresa S.A.S. CEO Human and Organizational Development Manager Legal Assistance Manager Internal Audit Manager Risk and Insurance Manager			POSITION: Executive Directors of the Businesses Grupo Nutresa S.A. Board of Directors		
DISCLOSED BY:			UPDATED BY:		
NAME: Servicios Nutresa S.A.S.			NAME: Servicios Nutresa S.A.S.		
POSITION:			POSITION:		
DATES					
POLICY PREPARED ON:			POLICY INCORPORATED ON:		
YEAR	MONTH	DAY	YEAR	MONTH	DAY
2013	02	20	2013	04	01
POLICY VALID THROUGH:			POLICY LAST UPDATED ON:		
			2017	03	27
ANNEXES					
ANNEX DESCRIPTION			ACCESS ROUTE		
POLICY CONTENT					
NAME OF THE POLICY				CODE	
Anti-fraud, Anti-Corruption and Anti-Bribery Policy				<input type="text"/>	

OBJECTIVE
To define Grupo Nutresa's corporate guidelines on the prevention, detection, investigation and response to the risks of fraud, corruption and transnational bribery with the purpose of minimizing the probability of materialization of said risks.



GRUPO NUTRESA — NUTRESA BUSINESS GROUP ANTI-FRAUD, ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

SCOPE

The Anti-fraud, Anti-Corruption and Anti-Bribery Policy is applicable to employees, customers, suppliers and third parties related to any of Grupo Nutresa's legal entities both in Colombia and abroad.

DEFINITIONS

- **Fraud:**

Fraud is defined as any action, attempt or omission intentionally performed to obtain an unlawful benefit which adversely affects the organizational principles and interests. Fraud comprises five main categories, as follows:

- **Misappropriation or misuse of financial resources and other assets of the legal entity:**

Illegal reallocation, misappropriation or misuse of the financial resources and other assets of the legal entity and/or administered by it to benefit personal or third-party interests.

- **Inadequate management of information assets:**

To inadequately create, access, eliminate, modify, alter, disclose or use information assets with unlawful purposes or for personal benefit. The following are several types of information assets included in this category (which do not limit the existence of other):

- ✓ Digital information assets: structured and unstructured information stored in or transferred by means of information technology (IT) elements to which the Organization allocates a value, which must be protected.
- ✓ Information assets in other physical and/or electronic means (videos, microfilms, etc.): structured and unstructured information stored in non-digital means to which the Organization directly allocates a value, which is why they must be protected.
- ✓ IT elements: devices, elements, means or resources that support the management of digital information assets. This includes, but it is not limited to: workstations, operating systems, mobile devices, printers, computer software, storage means, servers, user accounts, Internet browsing, networks, email, file transfer service, among other.

- **Corruption:**

Abuse of positions of power or trust for personal or third-party benefit against the interests of the Organization. The following are several cases included in this category (which do not limit the existence of other):

- ✓ To offer, request, deliver or receive assets in cash or in kind, as services or benefits, in exchange for actions, decisions or omissions.
- ✓ To accept any kind of offering, gift or endowment for personal benefit or for the benefit of any relative and/or friend.



GRUPO NUTRESA — NUTRESA BUSINESS GROUP ANTI-FRAUD, ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

- **Transnational bribery:**

Action through which employees, managers, associates or third parties related to any of Grupo Nutresa's legal entities directly or indirectly give, offer or pledge to a foreign public official: (i) sums of money, (ii) elements with monetary value, or (iii) any benefit or profit in exchange for actions, omissions or delays in the public official's duties with regard to an international activity, business or transaction.

- **Report forgery:**

Fabrication, elimination, modification, alteration or disclosure of any type of information aimed at distorting the reality of the performance of the employee, the company in general or any third party. It includes the deletion of significant information (affecting the decision-making processes). The following are several cases included in this category (which do not limit the existence of other):

- ✓ Supply of false information to cover deficient performance or to be granted any type of bonuses.
- ✓ Use of false reports to deceive investors, financial institutions, regulators or third parties in general.
- ✓ Tampering with financial statements: inadequate representation of revenue, overestimation or underestimation of assets, underestimation of liabilities, significant estimates that considerably differ from the actual situation of the business, among other.
- ✓ Deliberate omission or breach of exchange, tax, accounting, industrial safety, occupational health and/or environmental regulations established by the law applicable to Grupo Nutresa's companies.
- ✓ Concealment of accounting errors.

Fraud can involve dishonest actions of customers, suppliers, representatives, competitors, employees, former employees, managers, executive directors or third parties in general. Therefore, fraud can be contextualized based on the sources that commit it:

- Internal fraud: fraudulent actions performed internally by the companies' own employees, executive directors, managers or representatives.
- External fraud: fraudulent actions performed by people who is not directly connected with Grupo Nutresa, such as suppliers, contractors, customers or third parties in general.

GENERAL CONDITIONS

For Grupo Nutresa, ethics is a differentiating and strengthening principle of its businesses, which means the Organization's management activities are carried out based on the highest standards of transparency and good corporate practices. These practices include the incorporation of a culture focused on the prevention and adequate management of fraudulent actions.

Consequently, the following general criteria are established with the purpose of defining the Organization's resolve to prevent, detect, investigate and respond to any possible fraudulent or corrupt action. These criteria are mandatorily enforceable and are not discretionary regarding their interpretation or application:



GRUPO NUTRESA — NUTRESA BUSINESS GROUP ANTI-FRAUD, ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

Grupo Nutresa:

- Does not tolerate actions of fraud, corruption or bribery, and it takes the necessary measures to fight them by means of adequate mechanisms, systems and control practices that enable the prevention, detection and response to this wrongful behavior.
- Integrates and coordinates a set of actions necessary to prevent and fight any possible fraud, corruption or bribery situations as a fundamental element articulated with all the other policies the Organization has established, particularly the Comprehensive Risk Management Policy.
- Fosters an environment of transparency by integrating the multiple systems developed for the prevention and detection of fraud, corruption and bribery, and by providing adequate channels to enable the report of said matters to the corresponding authorities in the Organization.
- Promotes a professional and corporate behavior based on the guidelines of the laws currently in force in every country where the Organization operates, as well as on the internal regulations and, particularly, on the provisions of the Code of Good Governance.
- Encourages a culture based on the “zero tolerance” principle regarding fraud, corruption and bribery, as well as on the application of the principles of ethics and responsible behavior by the Organization’s employees, regardless their organizational position.
- Identifies, develops and implements adequate procedures for the prevention, detection and response to fraud, corruption and bribery in the legal entities that are part of the Business Group, always striving toward a continuous improvement.
- Emphasizes proactive activities, such as prevention and detection, prioritizing them with regard to the reactive activities, such as investigation and penalty.
- Investigates any and all reports, complaints or actions of fraud, corruption or bribery regardless its economic repercussion and as early as possible, ensuring the confidentiality of the corresponding investigations.
- Guarantees a fair imposition of the penalties in accordance with the provisions of the corresponding laws and the corporate regulations and policies, particularly the Human Rights Policy. The Organization also undertakes the relevant legal actions to enable the intervention of the competent authorities and the enforcement of the laws.
- Is fully receptive to listen to, analyze and investigate, any action or suspicion of behaviors that would constitute fraud, corruption or bribery known or suspected by the employees, customers, suppliers or any other stakeholders. The Organization also fosters an adequate communication regarding said actions or suspicions.
- Authorizes, empowers and supports the Compliance Officer and the departments contributing to the Officer’s duties in order to ensure the feasibility of the necessary actions for the verification of the fulfillment of this Anti-fraud, Anti-Corruption and Anti-Bribery Policy. The Organization also provides the Compliance Officer with all the resources and means necessary for the performance of the corresponding duties.



GRUPO NUTRESA — NUTRESA BUSINESS GROUP ANTI-FRAUD, ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

Responsibilities:

- The Senior Management is responsible for the prevention, detection and management of the risks of fraud, corruption and bribery.
- All of Grupo Nutresa's employees are responsible for performing a correct Comprehensive Risk Management, and for the application of the self-control and self-assessment principles as a comprehensive part of the execution of their daily duties in order to strengthen the control environment in the operations of the Organization's legal entities.
- Every employee or third party connected with Grupo Nutresa must be permanently alert to any sign of fraud, corruption or bribery in their department or in the Organization. The employees are responsible for informing or reporting any concern or suspicion regarding possible fraudulent activities and they also have the responsibility of collaborating in the corresponding investigations by the means available for such purpose.
- The legal representatives of Grupo Nutresa's legal entities must make sure the political or civic contributions they make are not subject of fraud, corruption or bribery. Thus, said contributions must be made through Fundación Nutresa, watching over their integrity with regard to the policies established for such purpose, including the "Policy of donations in favor of democracy and the political activity."
- The employees or third parties who have identified a possible event of fraud, corruption or bribery have the responsibility to:
 - ✓ Immediately report it through the available communication channels in the corresponding legal entity (direct supervisor, HR, Servicios Nutresa's Internal Audit Management or Risk and Insurance Management departments) or by contacting the Ethics Line.
 - ✓ Avoid contacting the suspected people involved.
 - ✓ Take the necessary caution and let the corresponding authority conduct the investigation.
- Each company shall appoint an employee as Compliance Officer, who will be in charge of supervising the fulfillment of the regulations and procedures established in the provisions of this Anti-fraud, Anti-Corruption and Anti-Bribery Policy in the company.
- The Compliance Officers shall rely on the investigations of fraud, corruption and bribery coordinated, conducted and documented individually or jointly, as the case may be, by the person in charge of the process in which the event occurs and Servicios Nutresa's Internal Audit Management, Legal Assistance Management, HR Management, and Risk and Insurance Management departments.
- If the investigations reveal the existence of an event of fraud, corruption or bribery in any process, the Compliance Officers shall prepare the investigative report with the corresponding conclusions, remedy measures and improvement opportunities with the support from the Internal Audit Management and Risk and Insurance Management departments, as required.



GRUPO NUTRESA — NUTRESA BUSINESS GROUP ANTI-FRAUD, ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

- The decisions on whether to process or refer the investigation results to the competent authorities and/or the regulatory agencies for an independent investigation shall be made jointly with Servicios Nutresa's Legal Assistance Management department.
- The Compliance Officers shall provide the Internal Audit Management department, within 15 days after the closing date of each quarter, the details of the reports or complaints they have received, the results of the investigations conducted, the measures taken and the resulting improvement actions. The Internal Audit Management department shall consolidate said information and include it in the report which shall be submitted to Grupo Nutresa's Committee of Finance, Audit and Risks. The members of said Committee have the responsibility to provide the guidance support and advisory deemed pertinent.
- In the event of queries made by third parties regarding any case reported, the employees must inform them that they are not authorized to provide any information and should direct them to refer all queries to the department or person in charge of the investigation.

Other considerations:

Presumption of good faith. As a general principle, it is presumed that all employees and third parties connected with Grupo Nutresa act in good faith. When a person submits a report about a fraud or suspicion of fraud, it is presumed that this person is doing so in good faith and based on reasonable signs, indications or evidence.

Absence of retaliation. The person who reports any actual or potential act that undermines or breaches the guidelines of the Code of Good Governance shall not be the subject of retaliation, threats, discriminatory measures or penalties of any kind. However, if it is confirmed that the complainant acted maliciously or based on false facts with the purpose of damaging the defendant, the corresponding company reserves the right to impose the measures and penalties legally available in each country and the internal policies established by Grupo Nutresa for such cases.

Confidentiality. Every employee who, due to the process she or he is in charge of or to any other circumstance, participates or becomes aware of any investigation being conducted or previously conducted in any of Grupo Nutresa's companies has the responsibility to maintain the confidentiality of the information she or he has had access to and to protect the anonymity of the people who have prepared and/or submitted or presented any report. Therefore, the results of the investigation cannot be disclosed or discussed with people who do not have the legitimate need to know them or with officials who are not authorized to do so. The recipients of the reports arising from the investigative process and transactional or process-related analysis are determined by the Committee of Compliance and Human Rights.

Punitive regime. Grupo Nutresa's directors and employees who engage in fraudulent behavior shall be penalized in accordance with the Internal Work Rules of the company employing them, without prejudice to the pertinent legal actions applicable according to the offense committed. Said fraudulent behavior includes the following (as examples but without being limited to them): acting in a negligent manner or in bad faith regarding risk situations and weaknesses in the internal control system; concealing or covering up any action adverse to the corporate principles and



GRUPO NUTRESA — NUTRESA BUSINESS GROUP ANTI-FRAUD, ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

values; making false or ill-intentioned reports or complaints against any person; censoring colleagues who report a fraudulent activity; hindering investigations or deliberately omitting the implementation of the action plans focused on mitigating a fraud; or making individual decisions without following the regular hierarchical channel defined in this policy for addressing activities of fraud, corruption or bribery.

Compliance Officer. The Compliance Officer is an employee appointed by the Senior Management to fulfill directing, high-reliability and management duties focused on the supervision and the adequate compliance with this Anti-fraud, Anti-Corruption and Anti-Bribery Policy. The Compliance Officer shall be a person known for her or his leadership, integrity and experience. Furthermore, the Compliance Officer shall have full autonomy, resources for implementing the corresponding management actions, and direct access to the Senior Management.

Related policies and procedures.

- Code of Good Governance
- Code of Conduct for Suppliers
- Comprehensive Risk Management Policy
- Policy for the Prevention and Control of the Risk of Money Laundering and Terrorism Financing
- Internal Work Rules
- Human Rights Policy