



GRUPO EMPRESARIAL NUTRESA
Anti-Money Laundering & Combating the Financing of
Terrorism Policy

GENERAL INFORMATION					
PERSONS RESPONSIBLE					
DEFINED BY			AUTHORIZED BY		
NAME: Carmen Janette Sosa G.			NAME: Damaris Bibiana Giraldo M. Jairo González G. Carlos Uriel Gómez M. Alejandro Leyva L. Carlos Ignacio Gallego P. The Corporate Committee of Grupo Nutresa The Board of Directors of Grupo Nutresa		
ROLE: Compliance Employee			ROLE: The Human and Organizational Development Manager The Legal Assistance Manager, The Audit and Control Manager, The Risk and Insurance Manager, The President of Servicios Nutresa Presidents and Vice-Presidents The Board of Directors of Grupo Nutresa S.A.		
COMMUNICATED BY:			UPDATED BY:		
NAME: The Board of Directors of Grupo Nutresa S.A.					
DATES					
DATE OF ISSUE			STARTING DATE		
YY	MM	DD	YY	MM	DD
2012	05	01	2012	11	01
STATUS			LAST UPDATE		
2016	10	24	2014	10	24
ANNEXES					
ANNEX DESCRIPTION			ACCESS ROUTE		
The glossary corresponding to the Anti-Money Laundering & Combating the Financing of Terrorism Policy					
CONTENT OF THE POLICY					
NAME				CODE	
Anti-Money Laundering & Combating the Financing of Terrorism Policy					
OBJECTIVE					
To define the corporate guidelines for Grupo Empresarial Nutresa on managing the prevention and control of the risks of money laundering and the financing of terrorism, in order to minimize the possibility that the companies belonging to the Group are directly or indirectly used as an instrument for the concealment,					



GRUPO EMPRESARIAL NUTRESA

Anti-Money Laundering & Combating the Financing of Terrorism Policy

management, investment or advantage of any kind of money and other assets deriving from illegal activities in the development of their operations.

This policy complies with the Corporate Governance Code, the related policies of the Group, the current regulations on the matter and the best industry practices.

SCOPE

This policy applies to all companies belonging to Grupo Nutresa and to other related third parties.

For the purposes of this policy, Fundación Nutresa and Corporación Vidarium (Centro de Investigación en Nutrición, Salud y Bienestar) are also included in the term "Grupo Nutresa".

DEFINITION

This policy defines:

- 1) The criteria and principles of action facing situations of risk of money laundering and the financing of terrorism.
- 2) The management system for the prevention and control of the risks of money laundering and the financing of terrorism.
- 3) The obligations of the employees, as an active part of this system.
- 4) The governing body that supervises the compliance of the policy.

TERMS AND CONDITIONS

1. Terms and definitions.

The interpretation of the specific terms contained in the current policy shall be made according to the established definitions in the annexed glossary.

2. Performance criteria of employees:

The general criteria to achieve the compliance with the obligations and duties of the management team and all employees, in terms of Anti-Money Laundering & Combating the Financing of Terrorism, comprise:

- a) The knowledge of the related third parties: all officers from the companies belonging to Grupo Nutresa, whether they intervene or not in transactions on a national level or in foreign trade operations, shall apply the control measures and the procedures defined in the current policy.
- b) Confidentiality of the Information: the employees of the companies belonging to Grupo Nutresa shall not disclose, either directly or indirectly to any related third party, information about the procedures of control and analysis regarding the Anti-Money Laundering & Combating the Financing of Terrorism, that are applied to their operations. The disclosure of information shall not be done either about the reports on this subject that are submitted to the relevant authorities.

3. Principles for the relationship with third parties.

The relationships between the companies belonging to Grupo Nutresa and their related third parties are developed based on the following principles according to the corporate philosophy:



GRUPO EMPRESARIAL NUTRESA

Anti-Money Laundering & Combating the Financing of Terrorism Policy

- a) We act ethically with respect and corporate social responsibility.
- b) We operate under strict compliance with the law and in cooperation with the authorities.
- c) We practice the good corporate governance, our principles and values in the relations with our clients, suppliers and other related third parties.
- d) We manage risks in a responsible manner, without exceeding the following levels: moderate for financial and operational risks, and none for reputational risk.

4. Anti-Money Laundering & Combating the Financing of Terrorism Integrated System.

The procedures, mechanisms, practices and tools to manage and disclose the risks of money laundering and the financing of terrorism, as well as the mechanism to promptly report unusual or suspicious operations, and the structure of the system are described in the "Anti-Money Laundering & Combating the Financing of Terrorism Manual". See annex.

5. Persons responsible for the implementation and verification of compliance of the Anti-Money Laundering & Combating the Financing of Terrorism Integrated System.

5.1 For the holding company, Grupo Nutresa S.A.:

The person responsible will be appointed by the Board of Directors and under the name "Compliance Officer", said body will also have the faculty to appoint the substitute.

In determining the scope of action of the Compliance Officer, it will also be considered what have been established by control entities and governmental authorities.

5.2 For Grupo Nutresa subsidiaries, the following shall be considered:

5.2.1 In Colombia:

The person responsible, will be appointed by the highest corporate body of each company and under the name "Compliance Employee", said body will also have the faculty to appoint the substitute.

The scope of action will be established by the "Superintendencia de Sociedades", the "Dirección de Impuestos y Aduanas Nacionales" (DIAN) and the "Unidad de Información y Análisis Financiero" (UIAF).

5.2.2 In other Countries:

The appointment will be performed in compliance with local laws and regulations.

6. Governing Body to ensure the compliance with this policy:

The Compliance Committee shall be the governing body responsible for ensuring the compliance of this Policy. The Committee shall be integrated by the Compliance Officer, the Compliance Employee, the Audit and Control Manager, the Risk and Insurance Manager, and the Human and Organizational Development Manager.

The committee's functions will be defined in the Anti-Money Laundering & Combating the Financing of Terrorism Manual.

This committee shall report the progress and significant events associated with of money laundering and the financing of terrorism to the Audit Committee of the Board of Directors of Grupo Nutresa S.A.



GRUPO EMPRESARIAL NUTRESA

Anti-Money Laundering & Combating the Financing of Terrorism Policy

7. Obligations and prohibitions of the employees of the companies belonging to Grupo Nutresa.

Under the current legislation, all natural and legal persons are obliged to follow the measures referred therein, designed to avoid any act related to Money Laundering and the Financing of Terrorism.

Specific obligations employees and third parties related to Grupo Nutresa and its subsidiaries are established in the Anti-Money Laundering & Combating the Financing of Terrorism Manual.

Breaching said obligations will carry out penalties established by the law and by the Labour Code.

8. Obligations and prohibitions for related third parties.

All related third parties with whom any company belonging to Grupo Nutresa does business, shall be compliant with what is hereby established as well as in the Anti-Money Laundering & Combating the Financing of Terrorism Manual.

9. Related Policies and Procedures.

- Corporate Governance Code
- Supplier Code of Conduct
- Integrated Risk Management Policy
- Internal Work Regulations

10. Glossary

What are Illicit Activities

Illegal activities are those conducts and activities that in accordance with current legislation display an illegal nature, that is, against the law. Money laundering consists of giving the appearance of legality to money or other assets derived from illegal activities and it is a punishable act, as typified by the Article 323 of the Penal Code, as the following:

"Money Laundering. A person who acquires, protects, invests, transports, transforms, safeguards or administers assets originated directly or indirectly from activities of trafficking in migrants, human trafficking, extortion, illicit enrichment, extortive kidnapping, rebellion, arms trafficking, the financing of terrorism and administration of resources related to terrorist activities, drugs, narcotics or psychotropic substances trafficking, crimes against the financial system, crimes against the public administration or those related to the proceeds of crimes done under a conspiracy to commit an offence, or who gives assets derived from such activities the appearance of legality or legalizes them, conceals or disguises the true nature, origin, location, destination, movement or rights to such assets, or commits any other act for the purpose of concealing or disguising their illicit origin shall be punished by a term of imprisonment of eight (8) to twenty-two (22) years and a fine of six hundred and fifty (650) to fifty thousand (50,000) times the current legal minimum wage.

The same penalty shall apply when the conducts described in the preceding section are made on assets whose forfeiture has been declared.

Money laundering shall be punishable even if the activities, from which the assets or the acts punished in the preceding sections arise, have been executed totally or partially abroad.

The terms of imprisonment provided in the current article shall be increased by one third to one half of the penalty when foreign trade operations are made or merchandise is introduced into national territory for the execution of the conducts.



GRUPO EMPRESARIAL NUTRESA Anti-Money Laundering & Combating the Financing of Terrorism Policy

The increase of the penalty provided in the preceding section shall also apply when contraband merchandise is introduced into the country.”

Punishable offenses associated with the money laundering through foreign trade are: contraband/smuggling (article 319 of the Penal Code), promotion of contraband/smuggling (article 320 of the Penal Code), fraud of customs taxes (Article 321 of the Penal Code), acting as a front man (Article 326 of the Penal Code), illicit enrichment (Articles 327 and 412 of the Penal Code), the manufacture, traffic and possession of weapons and ammunition (Article 365 of the Penal Code), drug trafficking and other offenses (Articles 376, 377 and 382 of the Penal Code).

- **Contraband/Smuggling*:** A person who imports merchandise into Colombian territory, or exports merchandise from it through places outside the customs area or either conceals, disguises or avoids merchandise from the undergoing customs intervention and control in an amount that exceeds fifty (50) times the current legal minimum wages.
- **Financing of Terrorism*:** A person who directly or indirectly provides, organizes, supports, maintains, finances or funds outlawed groups or their members or foreign or domestic terrorist groups or terrorist activities.

This includes anyone who provides, collects, delivers, receives, manages, supplies, or keeps funds, goods or resources, or any other act related to the cause.

This includes any who provide, collect, deliver, receive, manage, aid, or keep funds, goods or resources, or performs any other act related to this same purpose.

- **Sources of risk:** Are those different components that a company must take into account to identify the operations, businesses or contracts that generate risk of ML/FT, including:
 - a) **Clients and Suppliers:** the natural or legal persons with whom the company establishes and maintains a commercial, contractual or legal relation for the sale or purchase of any good or service.
 - b) **Products:** the goods and services that a company offers or purchases in the development of its corporate purpose.
 - c) **Distribution Channels:** the means used by the company to offer and market its goods and services, such as retail outlets, door to door sales, internet or by phone.
 - d) **Territorial Jurisdiction:** The geographic areas identified as being exposed to the risk of ML/FT risk where the company offers or purchases its products.
- **Risk Management:** It is a structured approach to manage the uncertainty related to a threat through a sequence of human activities including risk assessment, development strategies to manage it and risk mitigation using managerial resources. The strategies include transferring the risk to another party, avoiding the risk, reducing the negative effects of the risk and accepting some or all consequences of a certain risk.
- **Tools:** Are all means used by the company to prevent the ML/FT risks and detect tempted, unusual or suspicious operations. These tools include among others the warning signs, indicators of unusual operations, programs to administer business risks and electronic control sheets.
- **Money Laundering*:** Are all actions to give the appearance of legality to resources from an illicit



GRUPO EMPRESARIAL NUTRESA

Anti-Money Laundering & Combating the Financing of Terrorism Policy

origin. It involves anyone who acquires, guards, invests, transports, transforms, keeps or administers illicit goods.

- **Unusual Operation:** is that operation whose amount or characteristics are not related to the economic activity of the clients or those that, because of their number, the quantities traded or because of their particular characteristics are outside the established parameters of normality.
- **Suspicious Operation:** Is that operation that because of its number, quantity or characteristic does not fall into the normal systems and practices of businesses, of certain industry or sector and that according to the uses and customs of the activity in question, *has not been reasonably justified*. Once detected, these operations must be reported to UIAF.
- **Legal Risk:** Is the possibility of loss incurred by a company when it is sanctioned, fined or required to indemnify damages resulting from the breach of rules or regulations and contractual obligations.
- **Reputational Risk:** Is the possibility of loss incurred by a company due to discredit, bad image, true or untrue adverse publicity about the institution and its business practices that causes loss of clients, declining revenue or judicial processes.
- **Operational Risk:** Is the possibility of incurring losses due to shortcomings, failures or inadequacies in the human resource, the processes, the technology, the infrastructure or due to the occurrence of external events.
- **Contagion Risk:** Is the possibility of loss that a company may suffer, directly or indirectly, due to any act or experience of a person who is related to or associated with the company. The related or associated person includes natural or legal persons that are likely to influence the company.
- **Warnings Signs:** Are particular circumstances that draw attention and justify a further analysis.
- **Related Third parties:** Are those natural and legal persons with whom the companies belonging to Grupo Nutresa establish commercial relations, such as clients, suppliers or business associates.

*Source: United Nations Office on Drug and Crime (UNODC)

11. Annexes:

Anti-Money Laundering & Combating the Financing of Terrorism Manual.

- Reviewed with Legal Assistance: May 24, 2012 – Verónica María Mercedes Mejía
- Reviewed by Organizational Design: May 25, 2012 – Andrés Felipe Vélez and Luisa Fernanda Ramírez
- Employees responsibilities and sanctions included: June 1, 2012 – Jorge Adrián Vásquez
- Validation with the Risk and Insurance Manager: Validation completed July 13, 2012 Validation with Internal Audit: Carlos Uriel Gómez, Armando de J. Marín, Blanca Nidia Yepes, August 9, 2012
- Validation by the Corporate Committee of Grupo Nutresa: October 26, 2012
- Validation by the Audit Committee of Grupo Nutresa: October 26, 2012
- Addition of Fundación Nutresa and Vidarium to the Scope: October 24, 2014