

Contributions and **Other Spending** GRI 415-1

In order to define Grupo Nutresa's corporate guidelines related to the prevention, detection, investigation and response to fraud and corruption risks, the Company adopted an Anti-Fraud and Anti-Corruption Policy aimed at minimizing the probability of incurring in these risks as well as a declaration of zero tolerance to fraud and corruption. The [Anti-Fraud and Anti-Corruption Policy](#) is part of the [Corporate Governance Code](#) and applies to all employees, clients, suppliers or third parties who have any relation with Nutresa or its companies in the strategic region.

This Policy provides that the legal representatives of Nutresa's companies should ensure that the political or social contributions and sponsorships are not subject to fraud or corruption.

The Policy also states that all contributions should be made through Fundación Nutresa; otherwise, the policies Fundación Nutresa has established for this purpose must be observed, including, but not limited to:

- "Policy on Donations for Democracy and Political Activity": this Policy includes guidelines regarding donations for democracy and political activity. It establishes the duty to comply with legal regulations regarding these contributions, the approval process, the requirements that must be met by both Grupo Nutresa and the beneficiaries, as well as the maximum amounts that are allowed to be donated.
- "Fundación Nutresa Management Model": the management model establishes guidelines on social contributions and sponsorships.

Value of contributions on 2017

Entity	Value COP
ANDI	
Corporación Empresarial Del Oriente Antioqueño	
Asociación Colombiana De Venta Directa	
Consejo Privado De Competitividad	
World Cocoa Foundation	
Asociación Nacional De Comercio Exterior	
Consejo Empresarial Colombia Para El Desarrollo	
Cámara De Comercio Colombo Americana	
Corporación Red Local Del Pacto Global En Colombia	
Federación Nacional De Cacaoteros	1.120.205.572
Fenalco	
Asociación Nacional De Exportadores De Café De Colombia	
Cámara Colombo Japonesa De Comercio	
Cámara Colombo China	
Cámara Colombo Venezolana	
Federación Nacional De Molineros De Trigo	
Cámara De Comercio Colombo Britanica	
Cámara De Comercio Colombo Centroamericana Y Del Caribe	

Value of political contributions on 2017

Entity	Value COP
Partido alianza verde	20.000.000