

CONTRIBUTIONS AND OTHER SPENDING 2019

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.

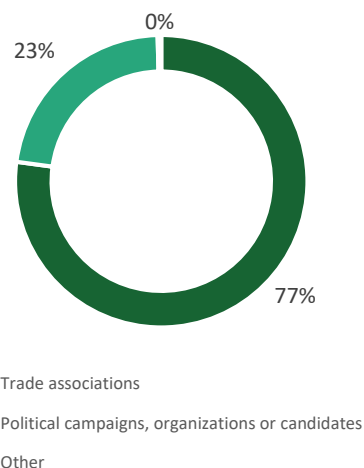
The Policy also states that all contributions should be made through Fundación Nutresa; otherwise, the policies Fundación Nutresa has established for this purpose must be observed, including, but not limited to:

- "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.

In 2019, contributions to trade associations represented 77,4% of the total of Contributions. Grupo Nutresa and its companies are members of various guilds, trade associations, chambers of commerce, among others. These entities contribute to the strengthening and promotion of our companies in the countries where we operate and abroad:

Value of contributions

Entity	Value COP
ANDI	973.447.546
Corporación empresarial del oriente antioqueño	81.648.250
Asociación colombiana de venta directa	48.540.746
Defencarga	32.190.000
Asociación Nacional De Comercio Exterior-Analdex	32.080.500
Federación Nacional De Cacaoteros	31.717.665
Asociación Nacional De Anunciantes De Colombia	27.800.243
Consejo Empresarial Colombia Para El Desarrollo Sostenible	22.050.000
Camara De Comercio Colombo Americana	18.720.000
Camara Colombo China De Inversión	16.735.429
Asociación De Industrias De La Republica Dominicana	10.793.797
Corporación Red Local Del Pacto Global En Colombia	10.000.000
Camara Colombo Japonesa De Comercio	9.936.000
Asociación Nacional De Exportadores De Café De Colombia	8.250.000
Others (seven entities)	31.286.716



Contributions in favor of democracy in 2019 represented 23,6%, which were allocated to the campaigns corresponding to the election of the Mayor and Governor of the main cities of Colombia:

Value of contributions

Entity	Value COP
Fundación Inspiramos - Political campaigning Mayor of Medellín	50.000.000
Corporación Compromiso Colombia Cívica	40.000.000
Centro Democrático - Political campaigning Mayor of Bogotá	40.000.000
Partido Alianza Verde - Political campaigning Mayor of Bogotá	40.000.000
Corporación Medellín Se Mueve - Political campaigning Mayor of Medellín	40.000.000
Galán Pachón Carlos - Political campaigning Mayor of Bogotá	40.000.000
Centro Democrático - Political campaigning Governor Antioquia	30.000.000
Corporación Compromiso Colombia Cívica - Political campaigning Governor Antioquia	30.000.000
Partido Liberal Colombiano - Political campaigning Governor Antioquia	30.000.000
Fundación Nuestra Antioquia Líder - Political campaigning Governor Antioquia	30.000.000
Asociación Cali Siglo XXI - Political campaigning Mayor of Cali	25.000.000