GENERAL INFORMATION

PERSONS RESPONSIBLE

DEFINED BY	AUTHORIZED BY
NAME: Roberth Suárez Palacio	**NAME:** Jorge Iván Aristizabal
POSITION: Information Security Leader	**POSITION:** Technology Manager

COMMUNICATED BY	UPDATED BY
NAME: Roberth Suárez Palacio	**NAME:** Roberth Suárez Palacio
POSITION: Information Security Leader	**POSITION:** Information Security Leader

DATES

ELABORATION OF THE POLICY			BEGINNING OF THE POLICY		
YEAR	MONTH	DATE	YEAR	MONTH	DATE
2019	11	15	2020	01	09

VALIDITY OF THE POLÍCY			LAST UPDATING OF THE POLICY		
2022	01	09	2020	04	22

ATTACHMENTS

DESCRIPTION OF THE ATTACHMENTS	
Attachment 1.	
Attachment 2.	

CONTENT OF THE POLICY

NAME OF THE POLICY	CODE
INFORMATION SECURITY POLICY	

OBJETIVE

To establish a framework for governance and action for the appropriate use of technological resources, the refinement of processes and people's awareness for information management in all its forms, seeking to manage the risks that may affect information confidentiality, integrity, and availability

SCOPE

This framework applies to all companies that make up *Grupo Empresarial Nutresa* and other related third parties.

PURPOSE OF THE POLICY

1. To build procedures, norms and instructions that provide the necessary clarity on Information Security to the different stakeholders.
2. To strengthen the culture and awareness of Information Security, generating the commitment and responsibility of the different related Parties.
3. To establish the mechanisms and practices necessary, seeking the protection of the confidentiality of the information of clients, suppliers, employees, other third parties, trade secrets and any information considered sensitive or confidential in the development of operations.
4. To establish appropriate behaviors regarding the management and use of the different technological and non-technological media in which information is stored, transmitted or processed.
5. To contribute to the continuity of the business in the face of different incidents.
6. To build an environment of trust for stakeholders.

GENERAL CONDITIONS

FUNDAMENTAL PRINCIPLES OF INFORMATION SECURITY

Information Security is the set of **Preventive** and **Reactive** measures of organizations and technological systems on **People, Processes** and **Technology,** which permit safeguarding and protecting information, seeking to maintain its **Confidentiality, Integrity** and **Availability. (ISO 27001 – SGSI).**

Confidentiality: To ensure that the information is accessible only to those authorized to have access.

Integrity: To ensure accuracy, inalterability and completeness of the information and the methods of its process.

Availability: To ensure that authorized users have access to the information and its associated assets when required.

INFORMATION SECURITY GOVERNANCE

The Grupo Nutresa Steering Committee: This is the highest body in charge of approving the Information Security and Cybersecurity measures proposed by the Information Security Committee, or any other related matter that exceeds its level. Likewise, it is in charge of supporting the implementation of the measures in the different Grupo Nutresa Businesses or Companies.

The President of Servicios Nutresa: His or her function will be to periodically supervise and report the management of Information Security to the Board of Directors through its Finance, Audit and Risk Committee.

The Grupo Nutresa Information Security Committee: This is made up of the managers of Organizational Human Development; Legal Assistance; Risks, Insurance and Infrastructure; Information Technology; and Internal Auditing; and the participation of a member of the Directorate of Labor Assistance.

Its main function is to review the Information Security strategy and its alignment in terms of compliance and risk; and together with the President of Servicios Nutresa to present it to the Finance, Audit and risk Committee for approval. Likewise, it shall also periodically report the compliance and advances in its implementation to this Committee.

Additionally, it may propose to the Information Security Subcommittee the development and governance of some elements of Information Security that have not been addressed and that are of relevant interest for the development of the Grupo Nutresa Information Security strategy.

This Committee will determine the topics that, due to their impact, must be reported to the Grupo Nutresa Steering Committee in order to obtain approval for their implementation.

The Grupo Nutresa Information Security Subcommittee: This is made up of a representative of Risks, Internal Auditing and IT Information Security and will be in charge of proposing policies, guidelines, projects, dissemination strategies, etc., and promoting Information Security, its implementation and compliance.

Head of Information Security and Compliance: This position will be in charge of designing the Information Security strategy, support the President of Servicios Nutresa in its development and implement compliance measures and strategy, in order to mitigate the risks associated with Information Security from its Confidentiality, Integrity and Availability, taking into account the integral vision of risk management and compliance.

Servicios Nutresa Risk Management: This dependency is responsible for accompanying the Grupo Nutresa companies in the process of identifying and assessing the risks associated with Information Security, in accordance with existing methodologies and models, while participating in the development of policies and management strategies associated with this risk.

Internal Auditing: This area is responsible for ensuring – in the third line of defense – compliance with the Information Security specifications and measures established by this Policy, and by the norms, procedures or practices that arise from it. This is done by conducting audits on the systems and activities related to the management of information assets and information technology (I. T.).

The I. T. Account Executive in the Businesses: This is the point of contract between the Businesses and the Office of the Head of Information Security. It is in charge of facilitating the understanding of proposals and definitions on Information Security issues and for articulating the strategy and the appropriate actors to successfully develop the implementation.

Process Leaders: They are the owners of the information assets of their processes and, therefore, are responsible for the classification, maintenance and updating of the information, as well as documenting and keeping the classification made updated, and defining which users should have access permissions to the information according to their functions and competence. In general, they are responsible for keeping the information asset intact, confidential and available while it is developed, produced, maintained and used.

CLASSIFICATION OF INFORMATION

In Grupo Nutresa, we classify information according to its level of accessibility:

- ✓ **Confidential:** All information that is framed under an obligation of confidentiality through a contract or a document; or that related to sensitive data under the *Habeas Data* law.
- ✓ **Restricted:** Information that can only be known by a specific group of internal and external people because of their functions.
- ✓ **Internal Use:** Information to be used by Grupo Nutresa personnel and its companies.
- ✓ **Public:** Information for consultation by all people of Grupo Nutresa and those external to the Company.

TO COMPLY WITH THE POLICY

The respective dissemination and sensitization process will be carried out through different means.

Each of the Grupo Nutresa employees and related third parties is responsible for contributing to Information Security from their position

a. **Attachment 1.**
b. **Attachment 2.**