

INFORMATION DISCLOSURE POLICY

INTRODUCTION

Considering that information is the main instrument available to our shareholders, employees, clients, suppliers, consumers and other stakeholders, in this Information Disclosure Policy (herein, **THE POLICY**) Grupo Nutresa S. A. (herein, **NUTRESA** or **THE COMPANY**) seeks to ensure that the information disclosed to the market is transparent, fair, accurate and timely.

Therefore, Nutresa and all its subsidiaries, through their employees, undertake to disclose to the market all the information useful to investors to make decisions to buy, sell or hold securities issued by the Company, in compliance with the procedures and rules established in this Policy and ensure that under no circumstance confidential information is revealed.

DEFINITION

The Information Disclosure Policy is the set of principles and rules that govern how the information from Nutresa and its subsidiaries should be administered, and how it will be disclosed to the market when necessary, as determined by the Law and the Code of Good Governance of the Company.

Relevant Information shall be considered as every situation related to Nutresa, its subsidiaries or its issuance, which must be taken into consideration by a prudent, diligent expert to buy, sell or hold securities issued by the Company or when exercising the political rights inherent to such securities, as well as all the facts or situations described in Article 5.2.4.1.5 of Decree 2555 of 2010 and the regulations that modify or add to it, and that are divided into the following topics: Financial and Accounting Situation, Legal Situation, Commercial and Labor Situation, Business–Crisis Situations, Issuance of Securities, and Processes of Ownership.

All the strategic information of Nutresa or its subsidiaries, related to trade secrets, know–how or any type of technical or commercial information that constitutes a competitive advantage for the *Grupo Empresarial Nutresa* companies and, in general, all the information that, being made known to individuals, may affect the interests of the Company, its subsidiaries, its shareholders or third parties shall be considered Confidential Information

In accordance with the provisions of Article 5.2.4.1.8 of Decree 2555 of 2010 and the provisions of the Company’s Board of Directors, Nutresa’s Vice President General Counsel shall hold the quality of Legal Representative responsible to provide Relevant Information, and will present to the Board proposals to amend the Policy, if needed.

PRINCIPLES

The guiding principles are:

1. **Transparency:** Ensuring transparency of the information is one of the main objectives of this Policy. It is a corporate governance practice that the Company has implemented, seeking to keep the market informed on the progress of the commercial and financial activities it develops, the performance of its managers, the results and the contribution Nutresa makes to society.
2. **Opportunity:** Relevant Information will be disclosed to the market in a timely manner, in compliance with the provisions of the Law and the Corporate Governance Code, always protecting the interests of the Company and its stakeholders.
3. **Accuracy:** The information disclosed to the market must always be clear, precise and verifiable.
4. **Fairness:** Relevant Information will be disclosed to shareholders, employees, clients, suppliers, consumers and other stakeholders on equal terms, through efficient, timely mechanisms.
5. **Ethics:** The conduct of Grupo Nutresa employees and executives will adhere to all the rules and customs of the highest social and corporate morality.
6. **Integrity and Good Faith:** All functions that must be met in exercising the Policy to Disclose Relevant Information, by the employees and managers of the companies shall be made with integrity and honesty, and with due diligence and care.
7. **Legality:** At all times, compliance with the Law, Bylaws, Corporate Governance Code and other regulations of the companies shall be ensured.

RULES FOR THE IMPLEMENTATION OF THE POLICY

To implement the *Grupo Empresarial Nutresa* Information Disclosure Policy, the companies that comprise it, their directors and employees shall adhere to the following rules:

1. The Company, on the occasions and under the conditions stipulated by Law, shall disclose to the market clear, accurate and complete information about its essential aspects including, where applicable: its financial statements; transactions in shares and its other securities; the relevant businesses to the Company concluded between the Administrators, Senior Executives and Legal Representatives, including their relatives, partners and other related parties; the opportunities and problems that correspond to the evolution of its activity; and information related to its organization, development and business projects.
2. Under no circumstances may the Confidential Information of Nutresa or its subsidiaries be shared with third parties. If it becomes necessary to disclose Confidential Information to the market in compliance with the law, the Legal Representatives of the Company will assess the situation and make their best efforts to make sure that such information is protected, using established legal mechanisms for this purpose.

3. The Presidents of the Businesses that are part of *Grupo Empresarial Nutresa*¹ (herein, **THE BUSINESSES**) must schedule regular training to be conducted by the Vice President General Counsel or whomever he delegates, in which the Policy and the events that should be disclosed to the market as Relevant Information will be made known to managers and employees.
4. The Presidents of the Businesses and the other members of the Nutresa Corporate Committee shall ensure that their managers and employees act in accordance with the Policy and the law, and that all the facts that are likely to be disclosed to the market are known immediately by the Legal Representatives of the Company, mainly by the Vice President General Counsel.
5. Any manager or employee who knows a fact that is to be disclosed as Relevant Information must communicate the occurrence thereof to the President of the Business to which he belongs. The President of the Business who receives this information must make it known immediately to the Legal Representatives of the Company; namely, the Chief Executive Officer, the Chief Financial Officer and the Vice President General Counsel.
6. It is the responsibility of the Legal Representatives of the Company to ensure that the Relevant Information is known by the market on the occasion and through the mechanisms established by law, the Corporate Governance Code and the Bylaws.
7. The Vice President General Counsel, as the Legal Representative designated by the Board of Directors as being responsible for disclosing Relevant Information, and two (2) members of his staff, shall know the passwords and how to enter the Integrated Securities Market Information System (*Sistema Integral de Información del Mercado de Valores*, SIMEV) and shall publish the Relevant Information when necessary, in accordance with the provisions of the Law and this Policy.
8. The *Servicios Nutresa S. A. S.* Manager of Financial Planning will be responsible for publishing the quarterly and year-end Financial Statements. Therefore, he and two (2) members of his staff shall know the passwords and how to enter the Integrated Securities Market Information System (*Sistema Integral de Información del Mercado de Valores*, SIMEV) and shall publish the Relevant Information when required by Law.
9. The *Servicios Nutresa S. A. S.* Manager of Financial Planning must keep the Nutresa Legal Representatives informed of the financial and accounting facts that are or are likely to be published as Relevant Information.
10. The Investor Relations Director, the top executives of Nutresa and the other companies that are part of *Grupo Empresarial Nutresa* should consider the following guidelines when seeking to share company information with shareholders, investors or the general public:

¹ The *Grupo Empresarial Nutresa* Businesses are the Biscuit Business, the Chocolate Business, the Cold Cut Business, the Pasta Business, the Ice Cream Business, the Coffee Business, Tresmontes Lucchetti, and Consumer Food.

- ✓ They may not disclose to the public information likely to be Relevant Information until this information has been published through the mechanisms and in the manner established by the Law and this Policy.
- ✓ The projections of *Grupo Empresarial Nutresa* and the companies that are part of it may not share this information with the public until it has been widely disclosed by the CEO, the Chief Financial Officer or the Investor Relations Director of Nutresa.
- ✓ Strict confidentiality must be maintained with the Confidential Information or any other information that could affect the interests of the *Grupo Empresarial Nutresa* companies, its shareholders or third parties.

VERIFICATION OF COMPLIANCE

The *Servicios Nutresa S. A. S.* Internal Audit Area will be responsible for ensuring compliance with this Policy in all the companies that are part of *Grupo Empresarial Nutresa*.