



COMPLIANCE RISK MANAGEMENT POLICY ML/TF/FPWMD- C/TB

November 30 2023

OBJECTIVE

Definition of Grupo Nutresa's corporate guidelines for managing the prevention and control of the risks of money laundering, terrorism financing, the financing of proliferation of weapons of mass destruction, corruption and transnational bribery or any related source crimes (hereinafter ML/TF/FPWMD-C/TB). The purpose of this definition is to minimize the possibility of any Grupo Nutresa company being directly or indirectly used through their operations as an instrument for the materialization of these risks.

This policy is aligned with both the provisions of Grupo Nutresa's Code of Corporate Governance and the corresponding regulations currently in force.

SCOPE

This Policy is applicable to all the companies that are part of Grupo Nutresa, and to all related third parties in the jurisdictions where they operate.

For the purposes of this Policy, the following are included in the concept of Grupo Nutresa: Fundación Nutresa, the Nutrition, Health and Wellbeing Research Center "Vidarium" Corporation, the "Compañía de Galletas Noel S.A.S.", and "Industria de Alimentos Zenú S.A.S". Employee Mutual Investment Fund, the "Alimentos Cárnicos S.A.S". Employee Mutual Investment Fund, and the Mutual Investment Fund of the employees from Grupo Nutresa S.A. and its companies.

DEFINITIONS OF GUIDELINES

This Policy defines the guidelines related to:

- The system for the prevention, control and management of the Compliance Risks: ML/TF/FPWMD - C/TB.
- The instances and governing bodies to supervise compliance with this Policy.
- The persons responsible for the system for the prevention, control and management of Compliance Risks.
- The criteria for action, obligations and prohibitions that are incumbent upon the employees of the Companies.
- The principles of the relationships with third parties, as well as the obligations and prohibitions that are incumbent upon them.



GENERAL CONDITIONS

1. TERMS AND GENERAL DEFINITIONS

For the proper interpretation of this Policy, the terms that appear in capital letters, in plural or singular, have the meaning attributed to them in Annex No. 1.

2. SYSTEM FOR THE PREVENTION AND CONTROL OF THE COMPLIANCE RISKS MANAGEMENT: MONEY LAUNDERING, TERRORISM FINANCING, FINANCING OF PROLIFERATION OF WEAPONS OF MASS DESTRUCTION, CORRUPTION AND TRANSNATIONAL BRIBERY.

The System for the Prevention and Control of ML/TF/FPWMD-C/TB Risks includes the procedures, mechanisms, practices and tools for managing and disclosing the risks associated with ML/TF/FPWMD-C/TB, as well as the mechanisms for reporting warning signs and unusual or suspicious operations in a timely manner, and the structure of the system are all included in the "Manuals for the prevention and control of the Risks of Money Laundering, Terrorism Financing and the Financing of Proliferation of Weapons of Mass Destruction from each one of the companies."

3. GOVERNANCE AUTHORITIES AND BODIES SUPERVISING THE COMPLIANCE WITH THIS POLICY

3.1. BOARD OF DIRECTORS AND ITS AUDIT COMMITTEE

The responsibilities of Grupo Nutresa S.A. Board of Directors shall be all the applicable responsibilities pursuant to the regulations currently in force regarding the prevention of ML/TF/FPWMD-C/TB which it will fulfill with the support of its Audit Committee, according to the provisions of the Code of Corporate Governance. These governance bodies shall also be informed about the alignments and regulatory compliance regarding the prevention of ML/TF/FPWMD-C/TB that must be fulfilled by all of Grupo Nutresa's operative companies based on applicable regulation.

3.2. COMPLIANCE RISK MANAGEMENT COMMITTEE

The Compliance Risk Management Committee is the body responsible for supporting and accompanying the management of the prevention and control of Compliance Risks ML/TF/FPWMD-C/TB in the Companies.

The Committee will be composed of the Compliance Officer of Grupo Nutresa S.A., the Managers of: Legal Assistance, Internal Audit, Risks and Real Estate Assets, and Human and Organizational Development of Servicios Nutresa, who may appoint their alternates. Likewise, when required, the Compliance Officers of the Grupo Nutresa's Companies will participate.

The tasks and responsibilities of the Committee shall be the following:

- Supporting and validating the formulation and implementation of the policies, manuals, criteria and practices used in the construction, management and disclosure of the comprehensive for managing the prevention and control of Compliance Risks (ML/TF/FPWMD-C/TB) of each one of Grupo Nutresa's companies.
- Supporting the development and implementation for managing the prevention and control of Compliance Risks (ML/TF/FPWMD-C/TB) of each one of Grupo Nutresa's companies.

- Validating the methodologies, procedures and guidelines, as well as the mechanisms and results of the monitoring for ensuring the adequate operation of the System at each one of the companies.
- Recommending objective criteria for managing warning signs of ML/TF/FPWMD-C/TB in the cases identified at each one of the companies.
- Reporting to the Audit Committee of the Grupo Nutresa S.A. Board of Directors about the progress and any significant events associated with the System at each one of Grupo Nutresa's companies in a consolidated manner at least once a year.
- Any other tasks assigned by the Audit Committee of the Grupo Nutresa S.A. Board of Directors.

4. STAFF IN CHARGE OF THE SYSTEM FOR THE PREVENTION AND CONTROL OF COMPLIANCE RISK MANAGEMENT (ML/TF/FPWMD-C/TB)

4.1. FOR THE PARENT COMPANY, GRUPO NUTRESA S. A.:

The person in charge shall be appointed by the Board of Directors under the job title of "Compliance Officer." Said governance body shall also appoint a substitute compliance officer when deemed necessary.

For the definition of the framework of action of the Compliance Officer, the Legal Representative and the Board of Directors shall include the provisions of the regulations applicable to Grupo Nutresa.

4.2. FOR GRUPO NUTRESA OPERATIVE COMPANIES:

4.2.1. IN COLOMBIA:

The staff in charge shall be appointed by the Board of Directors or the highest governance body of each company under the job title of "Compliance Officer." Such governance body shall also appoint a substitute compliance officer when deemed necessary.

For the definition of the framework of action of the Compliance Officer, the Legal Representative and the Board of Directors or highest governance body, shall include the provisions of the regulations applicable to each specific company in terms of ML/TF/FPWMD - C/TB. The details of this framework of action can be found in the Manuals for Compliance risk management of each company.

4.2.2. MUTUAL INVESTMENT FUNDS:

For the Mutual Investment Funds, the staff in charge shall be appointed by the Board of Directors under the job title of "Responsible Officer." Said governance body shall also appoint a substitute compliance officer when deemed necessary.

4.2.3. IN OTHER COUNTRIES:

The appointment and the framework of action shall be executed in compliance with the corresponding regulations regarding ML/TF/FPWMD - C/TB.

5. BEHAVIORAL CRITERIA FOR THE GRUPO NUTRESA EMPLOYEES

The following are the general criteria for the fulfillment of the obligations and duties of the managing staff and all employees in terms of control and prevention of ML/TF/FPWMD - C/TB:

a) Knowledge of related third parties: all of the employees of Grupo Nutresa's companies, whether they intervene in the transactions with both local or international organizations or not, shall be bound to apply, as the corresponding requirements may be, the prevention and control measures included in the procedures that are explained in full detail in the manuals of each of the companies based on the guidelines established in this Policy.

b) Confidentiality of information: no employee of any of Grupo Nutresa's companies may disclose to related third parties, directly or indirectly, information about the control and analysis procedures used in their operations for the prevention of ML/TF/FPWMD - C/TB or any restricted-use or internal information about the companies' Systems of Compliance Risk Management. All requests in this regard shall be directly managed by the respective Compliance Officer of each one of the companies or the respective Responsible Officer.

c) Reporting warning signs: if an employee identifies a warning sign, such employee must proceed to report it immediately through the mechanisms established in the manuals and procedures of each one of the companies.

The specific obligations of the employees directly hired by the Companies are described in the manuals and procedures of each one of the companies.

The noncompliance of the obligations contemplated in this Policy, would entail the sanctions established in the internal working regulations of each one of the companies.

6. PRINCIPLES FOR THE RELATIONS WITH THIRD PARTIES

According to the Organization's corporate philosophy, the development of the relations between Grupo Nutresa's companies and their related third parties shall always be based on the following principles:

- All our actions must be based on ethics, respect and corporate social responsibility.
- We must always operate under strict compliance with the law and in collaboration with the competent authorities.
- Respect the rules of corporate governance, the principles and values towards clients, suppliers and other Related Third Parties.
- Manage all risks in a responsible manner, guaranteeing the following risk levels, defined by the company, are never exceeded: financial and operational, moderate; commercial, aggressive; reputational, none.

7. OBLIGATIONS AND PROHIBITIONS THAT ALL RELATED THIRD PARTIES MUST FULFILL

All of Grupo Nutresa's related third parties that conduct business operations must comply with the Policy to Compliance risks management, and implement measures focused on preventing their operations from being used for illegal activities or purposes related to ML/TF/FPWMD - C/TB.

8. RELATED POLICIES

- Code of Corporate Governance.
- Code of Conduct for Suppliers.
- Integrated Risk Management Policy.
- Donation policy in favor of democracy and political activity.
- Information Disclosure Policy
- Information and personal data security policy
- Anti-fraud, Anti-Corruption and Anti-Bribery Policy.

9. REVIEWS

Original document (version 1.0)

- Reviewed with legal assistance: May 24, 2012; by Verónica María Mercedes.
- Reviewed by the Organizational Design team: May 25, 2012; by Andrés Felipe Vélez and Luisa Fernanda Ramírez.
- Employee sanctions and responsibilities were included: June 1, 2012; by Jorge Adrián Vásquez.
- Validation carried out jointly with the Risk, Insurance and Security Manager: Validation finished on July 13, 2012.
- Validation made with the Internal Audit Department: Carlos Uriel Gómez, Armando de J. Marín and Blanca Nidia Yepes. August 9, 2012.
- Validation conducted by the Directive Committee: October 23, 2012.
- Validation performed by Grupo Nutresa's Finance, Audit and Risks Committee: October 26, 2012.

Revision (version 2.0)

- Expansion of the scope to cover both Fundación Nutresa and Vidarium: October 24, 2014.

Revision (version 3.0)

- Incorporation of amendments suggested by the ML/TF Prevention Compliance Department; June 26, 2019. Incorporation of amendments related to the Compliance Officers of the companies; July 16, 2019. Approval by the Finance, Audit and Risks Committee of the Board of Directors; July 26, 2019.

Revision (version 4.0)

- Incorporation of amendments suggested by the ML/TF Prevention Compliance Department; June 23, 2020. Incorporation of amendments suggested by the ML/TF Prevention Compliance Committee; June 24, 2020. Approval by the Finance, Audit and Risks Committee of the Board of Directors; July 31, 2020.

Revision (version 5.0)

- Incorporation of amendments based on the Single Newsletter No. 100-00016 issued on December 24, 2020, by the Colombian Companies Superintendency. Approval by the Finance, Audit and Risks Committee of the Board of Directors. April 30, 2021.

Revision (version 6.0)

- Review and scope of Corruption and Transnational Bribery Risks and policies related to the Transparency and Business Ethics Program. Approval by the Audit Committee of the Board of Directors. November 30, 2023.
- The reviewed version 6.0 of 2023, approved by the Board of Directors on November 30th, 2023, was found to be aligned with the current requirements of Grupo Empresarial Nutresa in compliance with the regulations currently in force that govern the matter. July 31, 2025.

Annexes N° 1

Terms and general definitions

- 1.1. **Companies:** it refers to all the companies that make part of Grupo Empresarial Nutresa.
- 1.2. **Corruption (C):** all the behaviors guided at a Company to benefiting, or seeking a benefit or interest, or being used as a means in the commission of crimes against the public administration or public assets or in the commission of Transnational Bribery conduct.¹
- 1.3. **Counterparty:** It refers to any person or organization with a commercial, business, contract-related, legal or any other type of connection with the Company. Grupo Nutresa's counterparties include, among other, its partners, shareholders, employees, clients, customers and suppliers.²
- 1.4. **Financing of the Proliferation of Weapons of Mass Destruction (FPWMD:** It refers to all actions that supply money or use financial services, fully or partially, for the manufacturing, acquisition, possession, development, export, transfer of materials, division transport, conveyance, deposit or dual usage for illegal purposes in violation of local laws or international obligations, when applicable.³
- 1.5. **Money Laundering (ML):** is the process of attempting to give an appearance of legality to resources generated through illegal activities.
- 1.6. **Warning Signs:** are the notifications emerging when an abnormal behavior that does not correspond to the normal behavior of counterparties is identified. This type of situations requires a deep and detailed analysis in order to rule out an activity of ML/TF/FPWMD-C/TB.
- 1.7. **Related third parties:** people or organizations with which Grupo Nutresa's companies establish business relations, such as: clients, customers, suppliers, business associates and all other stakeholders.
- 1.8. **Risk of Compliance:** it refers to the risks of ML/TF/FPWMD-C/TB.
- 1.9. **Risks of C/TB:** it is the risk of corruption and/or the risk of Transnational Bribery.
- 1.10. **Risks of Corruption:** It is the possibility that, by action or omission, the purposes of public administration are diverted or public assets are affected for a private benefit.
- 1.11. **Risk of Money Laundering, Terrorism Financing and the Financing of Proliferation of Weapons of Mass Destruction:** The possibility of loss or damage any Grupo Nutresa company could suffer for their susceptibility to be directly or indirectly used through their operations as an instrument for laundering money and/or channeling resources toward the execution of terrorist activities or financing the proliferation of weapons of mass destruction or for concealing assets originating from such type of activities. The actions related to ML/TF/FPWMD may materialize through risks such as: risks of contagion, legal risks, operational risks, reputational risks and any other risks the company is exposed to, with the subsequent negative economic effect said risks may entail for the organization's financial stability when it is used for such activities.⁴
- 1.12. **Suspicious Operation:** It refers to an unusual operation that, according to the types of use and regular characteristics of the corresponding activity, has also not been possible to be reasonably justified. This type of operation includes attempted or rejected operations, with characteristics that provide the character of suspicious.
- 1.13. **System:** it refers to the implemented system for the control and prevention of ML/TF/FPWMD-C/TB risks.
- 1.14. **Terrorism Financing (TF):** terrorism financing occurs when a person or an organization directly or indirectly carries out actions that promote, organize, support, maintain, fund or economically assist local and/or foreign illegal armed groups.

¹ Chapter XIII, Basic Legal Circular - Colombian Companies Superintendency.

² Chapter X, Basic Legal Circular - Colombian Companies Superintendency.

³ Colombian Financial Information and Analysis Unit (abbreviated UIAF in Spanish), concept issued on July 13, 2020.

⁴ Chapter X, Basic Legal Circular - Colombian Companies Superintendency.

- 1.15 Transnational Bribery risk or TB risk:** it is the possibility that a legal entity, directly or indirectly, gives, offers or promises to a foreign public servant sums of money, objects of pecuniary value or any benefit or utility in exchange for said public servant carrying out, omitting or delaying any act related to their functions and in relation to an international business or transaction.
- 1.16 Transnational Bribery (TB):** give, promess or offer to a foreign public servant sums of money, objects of pecuniary value or any benefit or utility in exchange for said public servant carrying out, omitting or delaying any act related to their functions and in relation to an international business or transaction. ⁵
- 1.17 Unusual Operation:** it refers to an operation whose amount or characteristics are not proportional to the ordinary or normal economic activity of the Company and that, based on its number, quantity or characteristics, does not fit normal parameters or ordinary practices of businesses in a sector, industry or with a type of counterparty.
- 1.18 Weapons of Mass Destruction (WMD):** Atomic weapons, weapons of radioactive material, lethal chemical and biological weapons, and any other weapon developed in the future that may have destructive characteristics comparable to that of the atomic bomb or others of those mentioned before. ⁶

⁵ Law 1778 of 2016 – Colombia.

⁶ United Nations General Assembly Resolution A/RES/32/84-B