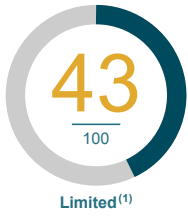


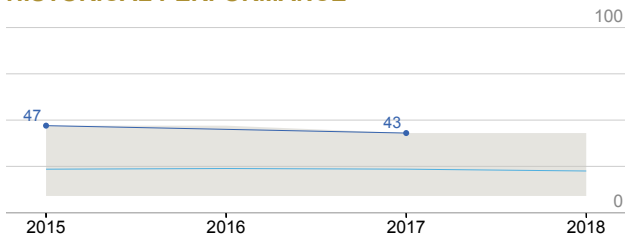
## Company and Sector Performance

### ESG OVERALL SCORE

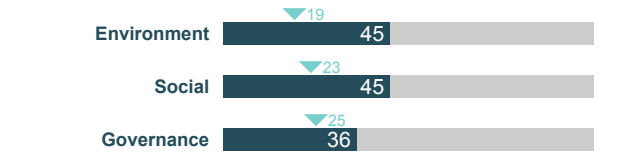


Information rate	71%
sector average	43%
Cooperation level <sup>(2)</sup>	Not responsive
High severity controversies	No
Rank in Sector	1/42
Rank in Region	52/890
Rank in Universe	570/4453

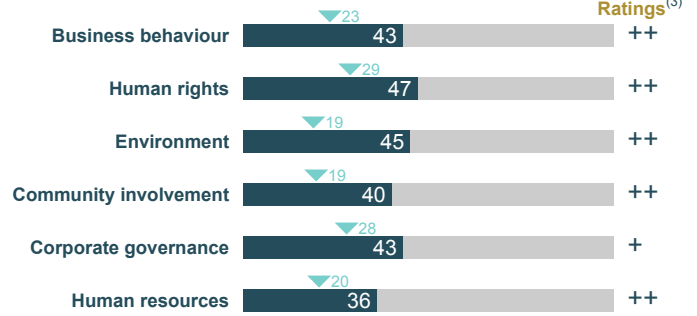
### HISTORICAL PERFORMANCE



### ESG PERFORMANCE (/100)



### 6 DOMAINS PERFORMANCE (/100)

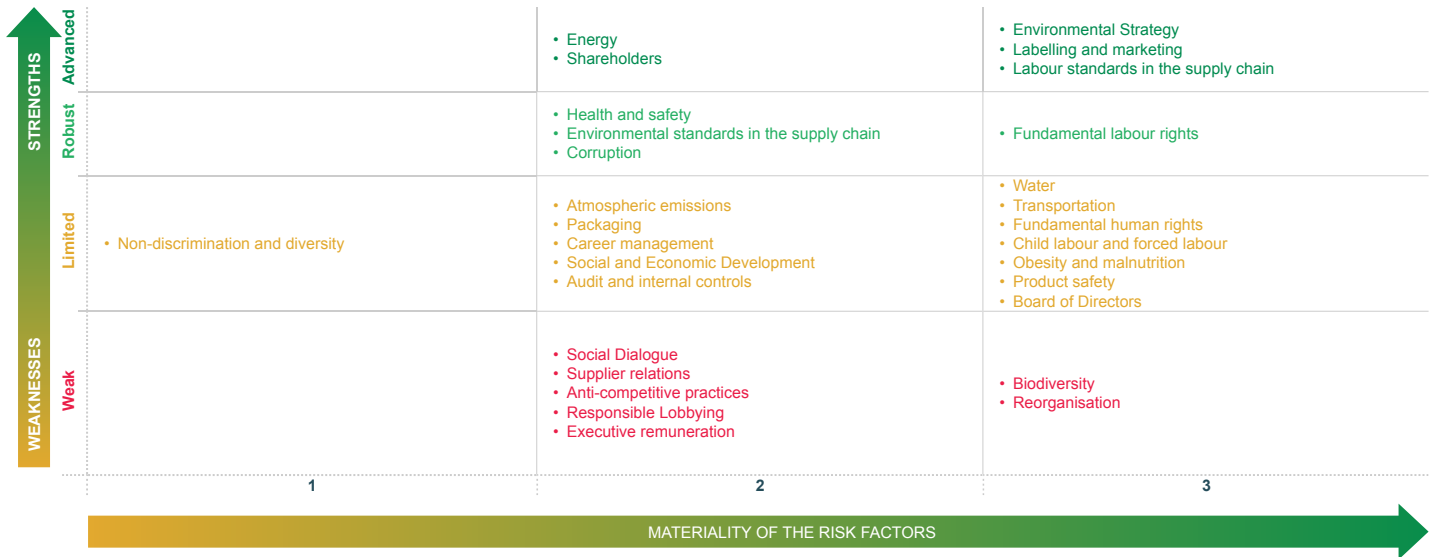


Company inclusion in Vigeo Eiris indices<sup>(4)</sup>: Yes

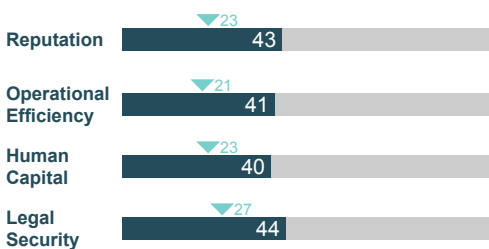


## Management of risks and opportunities

### MATERIALITY & PERFORMANCE MATRIX



### RISK MITIGATION INDEX (/100)



### ANALYST FOCUS

Analyst Focus is not available at this time

## Carbon Footprint and Energy Transition\*

"The Carbon Footprint & Energy Transition research provides an assessment of a company's carbon footprint combined with the strategy to manage risks and opportunities related to the transition to a low carbon economy. NI (No Info) is used to indicate that the information is not available."

### CARBON FOOTPRINT



SCALE	EMISSIONS (T CO2 EQ)	CATEGORIES
A	<100 000	Moderate
B	>= 100 000 and <1 000 000	Significant
C	>= 1 000 000 and <10 000 000	High
D	>= 10 000 000	Intense

### ENERGY TRANSITION SCORE



ENERGY TRANSITION SCORE	CATEGORIES
60-100	Advanced
50-59	Robust
30-49	Limited
0-29	Weak

## Goods and services contributing to sustainable development\*

"Sustainable Goods & Services research provides a positive screening on companies to identify business activities devoted to sustainable solutions."



INVOLVEMENT	CATEGORIES
>=50%	Major
20-49%	Significant
0-19%	Minor
0%	None

## Involvement in controversial activities\*

"The Controversial Activities research provides screening on companies to identify involvement in business activities that are subject to philosophical or moral beliefs."

Involvement in controversial activities: Not available in this version

### Screened Areas:

- Alcohol
- Animal welfare
- Chemicals of concern
- Civilian firearms
- Fossil fuels
- Gambling
- Genetic engineering
- High interest rate lending
- Military
- Nuclear power
- Pornography
- Reproductive medicine
- Tobacco

For more information please contact us at [customer.service@vigeo-eiris.com](mailto:customer.service@vigeo-eiris.com)

(1) Performance level: weak (0-29/100), limited (30-49/100), robust (50-59/100), advanced (60-100/100)  
 (2) Cooperation level on a 4-level scale: proactive, responsive, partially responsive, not responsive  
 (3) Ratings outline companies' benchmarked domain performance within a sector, on a 5-level scale: "-", "=", "+", "++", "+++" (4) Indices: based on the most recent indices at the date of publication. More details on vigeo-eiris.com.

## Company performance in all the Sustainability Drivers

		Weight	Overall score 43/100				Trend	Score	Leadership	Implementation	Results
			<b>Environment</b>				→	45	57	38	28
E	ENV1.1	3	Environmental Strategy				→	62	65	58	N/A
E	ENV1.4	3	Biodiversity				→	23	30	4	35
E	ENV2.1	3	Water				→	48	65	60	18
E	ENV2.7	3	Transportation				↗	40	30	30	60
E	ENV2.2	2	Energy				↘	65	65	65	65
E	ENV2.4	2	Atmospheric emissions				↗	33	65	18	15
E	ENV3.1	2	Packaging				↗	43	100	30	0
			<b>Human Resources</b>				↘	36	31	41	34
S	HRS2.3	3	Reorganisation				↘	23	0	48	35
S	HRS1.1	2	Social Dialogue				↗	26	55	0	22
S	HRS2.4	2	Career management				→	39	21	56	39
S	HRS3.2	2	Health and safety				→	54	65	56	40
			<b>Human Rights</b>				→	47	55	21	63
S	HRT1.1	3	Fundamental human rights				→	49	51	30	65
S	HRT2.1	3	Fundamental labour rights				↗	53	65	30	65
	HRT2.5	3	Child labour and forced labour				→	39	51	0	65
S	HRT2.4	1	Non-discrimination and diversity				→	42	51	30	45
			<b>Community Involvement</b>				↘	40	47	35	37
S	CIN2.1	3	Obesity and malnutrition				↘	46	58	39	42
S	CIN1.1	2	Social and Economic Development				↘	30	30	30	30
			<b>Business Behaviour (C&amp;S)</b>				↘	43	38	40	53
S	C&S1.1	3	Product safety				↘	47	52	53	35
S	C&S1.2	3	Labelling and marketing				↗	61	65	41	77
S	C&S2.4	3	Labour standards in the supply chain				→	60	56	58	65
S	C&S2.2	2	Supplier relations				↗	28	0	49	35
E	C&S2.3	2	Environmental standards in the supply chain				↗	54	56	58	48
G	C&S3.1	2	Corruption				→	53	41	41	77
G	C&S3.2	2	Anti-competitive practices				↗	14	0	0	43
G	C&S3.3	2	Responsible Lobbying					12	0	0	35
			<b>Corporate Governance</b>				→	43	48	32	49
G	CGV1.1	3	Board of Directors				→	42	51	14	62
G	CGV2.1	2	Audit and internal controls				↘	44	46	48	39
G	CGV3.1	2	Shareholders				↗	66	75	58	65
G	CGV4.1	2	Executive remuneration				↗	20	20	18	22

■ Weak (0-29/100)
 ■ Limited (30-49/100)
 ■ Robust (50-59/100)
 ■ Advanced (60-100/100)



Involvement in allegations



Involvement in allegations with evidence of corrective measures

Benchmark  
Position versus sector peers

Position versus sector peers		Environment	Human resources	Human rights	Community involvement	Business behaviour (C&S)	Corporate governance	Overall Score
<b>COT04PA00028</b>	<b>Grupo Nutresa SA</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>+</b>	<b>43</b>
MA0000012247	Cosumar	++	++	++	+	+	-	38
INE239A01016	Nestle India	+	+	+	++	+	+	35
BRBRFSACNOR8	BRF	+	+	+	-	++	=	34
TH0101010R14	Charoen Pokphand Foods	++	=	+	+	+	+	34
ZAE000071080	Tiger Brands	+	+	+	+	+	+	33
MYL1961OO001	IOI Corporation	=	=	+	+	+	+	31
TREULKR00015	Ulker Biskuvi	+	+	+	+	+	=	31
TW0001216000	Uni-president Enterprises	+	+	+	=	+	+	30
MA0000012049	Centrale Danone	+	++	+	+	+	-	29
MYL5222OO004	Felda Global ventures	+	+	=	+	=	+	28
MXP495211262	Grupo Bimbo	+	+	+	+	+	-	28
XS0836495696	Agrokor	+	+	+	+	+	-	27
KR7097951008	CJ CheilJedang	+	+	+	+	+	-	27
MX01LA040003	Grupo Lala	+	+	=	=	+	=	27
BRJBSSACNOR8	JBS	+	+	+	=	+	=	27
BRMDIAACNOR7	M Dias Branco	+	+	=	=	+	=	27
ZAE000026480	Remgro	=	=	=	=	=	+	25
MYL2445OO004	Kuala Lumpur Kepong	=	=	=	=	=	=	24
XS0991743310	Cofco	=	=	+	=	=	=	23
ZAE000216537	Bid Corporation	=	-	=	-	=	+	20
KYG210961051	China Mengniu Dairy	=	=	=	=	=	=	20
KYG2743Y1061	Dali Foods Group	=	=	=	=	=	=	20
MYL2291OO002	Genting Plantations	=	=	=	+	-	=	20
MYL4065OO008	PPB Group	=	=	=	-	=	=	20
KYG960071028	WH Group	=	-	=	=	-	+	20
ID1000116700	Indofood Sukses Makmur	=	=	-	+	=	=	19
MA0000012031	Lesieur Cristal	=	=	-	=	=	-	19
KYG9431R1039	Want Want China Holdings	=	=	=	-	=	=	19
TW0001227007	Standard Foods	-	=	=	-	-	+	17
KYG8878S1030	Tingyi Holding	-	=	=	-	=	=	17
PHY444251177	JG SUMMIT HOLDINGS	-	=	=	=	=	=	16
MXP4948K1056	Gruma	-	-	=	-	=	=	15
PHY9297P1004	Universal Robina	-	-	=	-	=	=	15

Copyright Vigeo Eiris 2018. Reproduction of this content (documents, graphs and images) in whole or in part are prohibited without the express written authorization of Vigeo Eiris and is protected by the provision of the French Intellectual Property Code

Position versus sector peers		Environment	Human resources	Human rights	Community involvement	Business behaviour (C&S)	Corporate governance	Overall Score
KR7001040005	CJ Corporation	-	=	-	=	-	-	13
ID1000117708	Charoen Pokphand Indonesia	-	-	=	-	-	-	12
KR7026960005	Dongsuh	-	-	-	-	-	--	11
KR7004370003	Nongshim	-	--	-	-	-	-	11
KR7271560005	Orion Holdings	-	-	=	=	-	-	11
KR7007310006	Ottogi	-	--	-	-	-	-	11
KR7004990008	Lotte Confectionery	-	-	=	-	-	-	9
MA0000012023	Unimer	-	-	-	-	-	--	9

Copyright Vigeo Eiris 2018. Reproduction of this content (documents, graphs and images) in whole or in part are prohibited without the express written authorization of Vigeo Eiris and is protected by the provision of the French Intellectual Property Code

## General information

Grupo Nutresa SA (Nutresa), headquartered in Medellín, Colombia, engages in the production, distribution, and sale of processed food products such as cold cuts,

biscuits, chocolates, coffee, ice cream and pasta. In June 2016 Grupo Nutresa acquired Fogasa, a cold storage plant located in Aguachica, Cesar, Colombia.

## Selected financial data

Key data	Revenues	EBIT	Employees
2016	COP 8,677bn	COP 815bn	45,618
2015	COP 7,945bn	COP 783bn	45,084
2014	COP 6,462bn	COP 638bn	38,796
2013	COP 5,898bn	COP 650bn	36,726
2012	COP 5,306bn	COP 521bn	31,650

Main shareholders	2017
Grupo de Inversiones Suramericana SA	34.8%
Grupo Argos SA	9.83%
AFP Porvenir SA	6.02%

Geographical Breakdown	Turnover 2016	Employees
Colombia	61.8%	N/A
Central America	9.5%	N/A
United States of America	8.2%	N/A
Chile	8.2%	N/A
Mexico	3.4%	N/A
Venezuela	2.2%	N/A
Peru	2.1%	N/A
Dominican Republic and the Caribbean	1.7%	N/A
Ecuador	1.4%	N/A

Main economic segment	Turnover 2016
Cold Cuts	23%

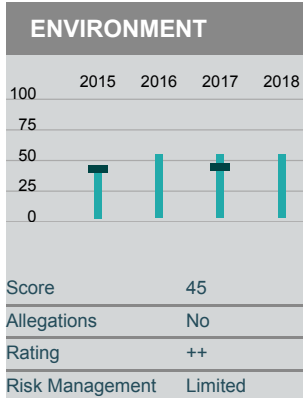
Main economic segment	Turnover 2016
Biscuits	20%
Chocolates	16.4%
TMLUCC	11.3%
Coffee	11%
Retail food	7.6%
Ice cream	5%
Pasta	3.3%
Others	2.4%

## Selected ESG Indicators

	2016	2015
Non-executive Board member(s) responsible for CSR issues	Yes	Yes
Executive remuneration linked to CSR performance	Yes	Yes
3-year energy consumption trend (normalized to turnover)	↘	N/A
Percentage of independent Board members	14.2	14.2
Percentage of women on Board	14.2	16.7
Percentage of women in Executive team	7.7	N/A
Percentage of women in workforce	37	37.4
Transparency on lobbying budget	No	No
Percentage of employees covered by collective agreements on working conditions	N/A	N/A
3 year trend for safety at work	↘	N/A
Involvement in armament	No	No
Management of social risks in supply chain	Advanced	Advanced

CSR performance per domain

■ Sector performance  
■ Company performance  
Rating : min- / max ++

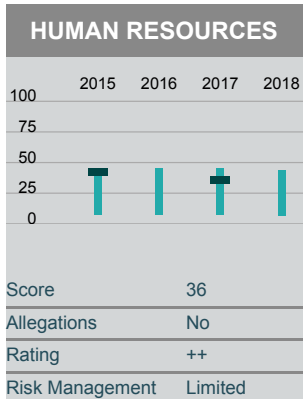


**Key issues**

The environmental strategy of a Food company should address the reduction of its main upstream impacts. This potentially covers issues such as sustainable agricultural management, sustainable biofuel production, sustainable fish sourcing and sustainable animal rearing (ENV 1.4). Companies must also manage their production impacts including water consumption and pollution (ENV 2.1) and the environmental impacts linked to transportation (ENV 2.7). Finally, companies must address downstream impacts such as the reduction of packaging weight, use of alternative materials and promotion of recycling (ENV 3.1).

**Company performance**

- Nutresa's absolute performance in the Environment domain is limited, in line with the previous review.
- The Company continues to disclose a relevant environmental strategy, including some targets, and to report on ISO14001 certification for a majority of operations. Reported key performance indicators on water resource protection show mixed results, while reported energy and CO2 emissions display decreasing trends. The Company continues to disclose only little information on the protection of biodiversity.
- Nutresa ranks above the sector average.

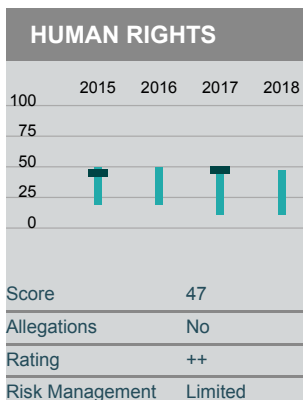


**Key issues**

In the labour-intensive Food sector, a large part of the workforce is blue-collar. In a context of large-scale restructurings, companies are expected to ensure employees' rights are respected and employee representatives are consulted (HRS 2.3). Moreover, given the fact the power struggle is particularly to the advantage of companies in this sector, good labour relations (HRS 1.1) are expected to provide employees with working conditions enabling, for instance, adequate training for the evolution of a generally low skilled workforce (HRS 2.4) or means to improve the usually bad ergonomic, physical and stress conditions of workers in the sector (HRS 3.2).

**Company performance**

- Nutresa obtains a limited absolute performance in the Human Resources domain, which represents a slight decrease since the previous review.
- A commitment is visible to promote labour relations, however, no systems appear to be in place to implement this. The Company reports to allocate some resources to mitigate the impact of reorganisations, however, no policy is visible on this topic. The majority of employees reportedly receive performance evaluations. Reported key performance indicators on career management and health & safety show stable and improving trends.
- The Company ranks above the sector average.



**Key issues**

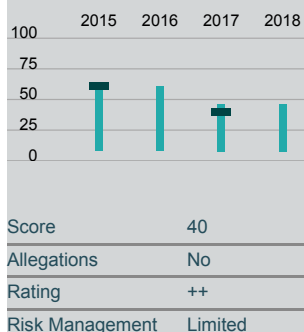
Companies in this sector operate and source raw materials from a range of low and middle income economies (as well as weak governance zones) where there is higher potential exposure to fundamental human rights violations (HRT 1.1). This exposure may be higher if security forces are used to secure locations or if the Company is sourcing materials from regions with less formalised protection of land rights. In addition, if a Company is involved in the production of pharmaceutical products, steps must be taken to ensure that 'informed consent' (of the patient) is obtained before conducting any clinical trials. Food companies also operate in locations where freedom of association and the right to collective bargaining may be restricted. This directly exposes them to potential violations of fundamental labour rights (HRT 2.1).

**Company performance**

- Nutresa's absolute performance in the Human Rights domain is limited, in line with the previous review.
- The Company continues to disclose relevant commitments and information on measures in place to address all issues under review.
- Nutresa ranks above the sector average.

Copyright Vigeo Eiris 2018. Reproduction of this content (documents, graphs and images) in whole or in part are prohibited without the express written authorization of Vigeo Eiris and is protected by the provision of the French Intellectual Property Code

## COMMUNITY INVOLVEMENT



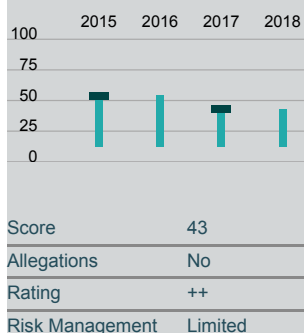
### Key issues

The food industry can help to tackle two major societal impacts linked to its products: reducing obesity and over-consumption-related diseases (cardio-vascular, diabetes, etc.) by producing and promoting healthier products and fighting hunger through providing access to food to vulnerable populations (CIN 2.1). Oxfam estimates that 75% of the world's poor and undernourished people live in rural areas and are directly or indirectly dependent on agriculture for their livelihoods. Thus, through their own activities and their supply chain, food companies are also seen as key players in the empowerment of local economies (CIN 1.1), a process that is increasingly being recognised as fundamental to addressing these societal challenges.

### Company performance

- Nutresa's absolute performance in the Community Involvement domain is limited.
- Nutresa continues to disclose commitments and to reports on measures in place to address all issues under review. However, there is a lack of reporting of consistent key performance indicators with historical data in order to gauge long-term performance trends. The Company's level of reporting on tax payments and its presence in off-shore financial centres appears to be insufficient.
- Nutresa ranks above the sector average.

## BUSINESS BEHAVIOUR (C&S)



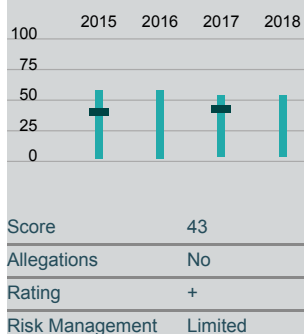
### Key issues

Following various health crises and food safety incidents (avian flu, salmonella, horsemeat scandal) the good application of product safety standards and the set up of a crisis management system throughout the supply chain (C&S 1.1) has become a fundamental issue for companies in the sector. Another major CSR challenge for the industry is the transparency of the information provided to customers and the reliability of marketing messages towards children as well as on issues such as health claims of content, or presence of GMOs (C&S 1.2). A number of raw materials (such as coffee, chocolate, sugar cane, etc.) used in the production process are sourced from developing countries where fundamental labour rights standards, as defined by the ILO, are not always respected. Moreover, the sector tends to outsource non negligible parts of its workforce and production. Thus, ensuring that labour standards are respected in the supply chain is a major responsibility of Food companies (C&S2.4).

### Company performance

- Nutresa's absolute performance in the Business Behaviour domain is limited.
- Nutresa discloses commitments and reports to have measures in place to address almost all issues under review, except for preventing anti-competitive practices and ensuring responsible lobbying.
- The Company ranks above the sector average.

## CORPORATE GOVERNANCE



### Key issues

Sound corporate governance is required to oversee a company's strategic direction, including the CSR strategy. Vigeo's framework has been adapted to capture the level of integration of CSR topics at Board-level, supplementing traditional signals on efficient governance practices. Directors are notably evaluated on their level of diversity and experience with operational, financial, and CSR topics (CGV1.1). The audit and internal controls system is examined regarding the efficiency and reach of its risk management (CGV2.1). Shareholders are expected to have fair voting rights and access to all relevant information on material CSR issues (CGV3.1). Executive remuneration is assessed for transparency and alignment with the interests of company's shareholders and other stakeholders (CGV4.1).

### Company performance

- Nutresa achieves a limited absolute performance in the Corporate Governance domain, in line with the previous review.
- Less than half of the board and committee members are considered to be independent. Some relevant mechanisms to integrate CSR factors at board, internal controls, shareholder and executive remuneration level are reported. Major restrictions have been identified to convene an EGM. There is an overall lack of disclosure on executive remuneration.
- The company ranks above the sector average.



## CSR performance per criterion

### Detailed Analysis

<b>Environment</b>	<b>11</b>
ENV1.1 Environmental strategy and eco-design	11
ENV1.4 Protection of biodiversity	13
ENV2.1 Protection of water resources	15
ENV2.2 Minimising environmental impacts from energy use and related emissions	17
ENV2.4 Management of other atmospheric emissions	18
ENV2.7 Management of environmental impacts from transportation	19
ENV3.1 Management of environmental impact from disposal of packaging	20
<b>Human resources</b>	<b>21</b>
HRS1.1 Promotion of labour relations	21
HRS2.3 Responsible management of reorganisation	23
HRS2.4 Career management and promotion of employability	24
HRS3.2 Improvement of health and safety conditions	26
<b>Human rights</b>	<b>28</b>
HRT1.1 Respect for human rights standards and prevention of violations	28
HRT2.1 Respect for freedom of association and the right to collective bargaining	30
HRT2.4 Non-discrimination	32
HRT2.5 Elimination of child labour and forced labour	34
<b>Community involvement</b>	<b>35</b>
CIN1.1 Promotion of the social and economic development	35
CIN2.1 Access to products and combating health problems linked to food	37
<b>Business behaviour (C&amp;S)</b>	<b>40</b>
C&S1.1 Product Safety (process and use)	40
C&S1.2 Information to customers	42
C&S2.2 Sustainable Relationships with suppliers	44
C&S2.3 Integration of environmental factors in the supply chain	46
C&S2.4 Integration of labour factors in the supply chain	48
C&S3.1 Prevention of corruption	50

C&S3.2	Prevention of anti-competitive practices	52
C&S3.3	Transparency and integrity of influence strategies and practices	54

## Corporate governance

CGV1.1	Board of Directors	56
CGV2.1	Audit & Internal Controls	58
CGV3.1	Shareholders	60
CGV4.1	Executive Remuneration	62

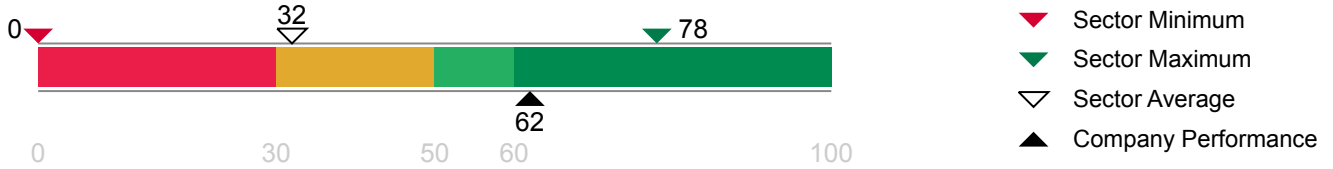
 Involvement in allegations     Involvement in allegations with evidence of corrective measures

Environment

Score: 45

ENV1.1 Environmental strategy and eco-design

(score: 62, weight: 3)



Visibility of commitment to environmental issues

The company has issued a formalised commitment to environmental protection, and sets specific targets in this regard. The company has set targets with regard to water consumption (30% by 2020) , energy consumption (25% by 2020) and GHG emission.

Relevance of environmental strategy

The company commits to the majority of its responsibilities in terms of environmental protection:

- Protection of biodiversity
- Eco-design of packaging
- Minimising environmental impacts from energy use and related energy emissions during the production process
- Minimising environmental impacts from water consumed in production
- Minimising environmental impacts from water emissions in production
- Management of other atmospheric emissions
- Management of environmental impacts from transportation
- Management of environmental impacts from the disposal of packaging
- Commitment to obtain ISO 14001 or EMAS : 70.4% of the sites are ISO 14001-certified operation centers

Ownership of commitment

The commitment applies throughout the company, supported by senior management.

Means allocated to environmental management

The company has allocated significant resources to environmental management:

- Environmental manual specifying procedures and responsibilities : There Company has a Manual for Clean Transportation.
- Management review of the EMS (at Executive Level)
- Environmental performance measured against targets : the Company has environmental targets and they are disclosed.
- External verification of reporting on environmental performance: The non-financial information is verified by KPMG Advisory Services (GRI 102-56), an independent auditing firm that abides by the guidelines of the ISAE 3000 international standard.

Coverage of certified environmental management systems

70.4% of the company's production sites are ISO14001 certified.

Measures taken to reduce food waste

The company has implemented measures to reuse food waste.

Grupo Nutresa` s food loss and waste reduction policy was designed in accordance with the guidelines issued by the Food and Agriculture Organization (FAO) of the United Nations. Zero waste Strategy is a model to manage products from the last link in the chain, recovering them to avoid them being destroyed; this permits optimizing the delivery of food fit for human consumption that meets quality standards, to increase the amount of goods used by the population served by food

*banks.*

<b>Leadership</b>	<b>65</b>
Visibility	100
Relevance	65
Ownership	30

<b>Implementation</b>	<b>58</b>
Means & resources	53
Coverage	65

ENV1.4 Protection of biodiversity

(score: 23, weight: 3)



Relevance of the commitment

The company's commitment towards biodiversity protection only addresses some of the relevant impacts of its activities:  
- Promotion of sustainable animal rearing

Managerial tools allocated to biodiversity protection

Information obtained from company and public sources regarding steps taken to identify the impacts of its operations on biodiversity is insufficient.

- Environmental impact assessments and/or risk mapping
- Training relevant managers or employees on biodiversity
- Relevant biodiversity management guidelines
- Monitoring of biodiversity indicators

Coverage of managerial tools allocated to biodiversity protection

Information obtained from company and public sources regarding means allocated to limit the company's impacts on biodiversity is insufficient

Means allocated to sustainable agriculture

Information obtained from company and public sources regarding means allocated to promote sustainable agriculture is insufficient

- Minimizing the use of external inputs (fertilizers, chemicals)
- Measures to protect pollinators
- Protection of soil from erosion and prevention of soil poverty from single-crop farming
- International certification schemes
- Promotion and effective development of organic farming
- Measures to prevent fragmentation of habitats (eg. limited size of fields)
- Measures to prevent deforestation
- Measures to protect peat lands

Means allocated to prevent GMO cross contamination

Information obtained from company and public sources regarding means allocated to prevent cross contamination is insufficient.

- full traceability and labelling systems
- information to farmers/cooperation between farmers to organise co-existence
- on-farm measures for co-existence (isolation distances, buffer zones, pollen traps/barriers, crop production cycle planning, etc.)
- harvest and post-harvest measures (eg. minimizing seed loss during harvest, cleaning of harvest machinery)
- transport and storage measures (avoiding spillage during transport, physical segregation of GM/non-GM crops after harvest)

- monitoring of GM crops in non-GM neighbouring fields
- biological gene flow barriers

*Grupo Nutresa considers that modern biotechnology offers great possibilities to contribute to human welfare and the potential to increase food production, provided that is developed and used responsibly, based on ethical and rigorous scientific research and applying the appropriate security measures for the environment and human health.*

**Means allocated to sustainable animal rearing**

*The company has allocated some means to promote sustainable animal rearing: - Measures to ensure animal well-being : the company made adjustments in order to improve waste quality in their PIG farms and to impact positively the health of the animals. In addition, 96.8% of the PIG farms that supply the company's business are certified in best livestock and safety practices*

**Results with regard to biodiversity protection**

Information obtained from company and public sources regarding biodiversity indicators on its sites of operations is insufficient

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 10/2017, Grupo Nutresa SA did not appear to be involved in any controversy related to this sustainability driver*

<b>Leadership</b>	<b>30</b>
Relevance	30

<b>Implementation</b>	<b>4</b>
Means & resources	5
Coverage	0

<b>Results</b>	<b>35</b>
Performance	65
Trends	0

ENV2.1 Protection of water resources

(score: 48, weight: 3)



**Relevance of the company's commitment in terms of reducing its water consumption**

The company has set quantified targets with regard to its water consumption, and these cover the entire group.

**Relevance of the company's commitment in terms of reducing its water emissions.**

The company has set quantified targets with regard to its water emissions, and these cover the entire group.

*Grupo Nutresa proactively works on establishing a water-resource sustainability culture in its direct operations, in which it has the goal of reducing consumption by 30%, and it also works on the formulation of a management framework that involves agents from its value chain. The production plants will continue to implement the necessary measures to reduce water consumption per ton produced by 30% with regard to the 2010 consumption.*

**Means allocated to mitigate direct water consumption**

The company has set up monitoring systems for its water consumption, and has technological systems in place such as end-of-pipe processes to reduce its impacts OR works to optimize its processes.

*Moreover, the company implemented measures such as condensate recovery in heating systems and the reuse of industrial water at a pasta Business plant in Mosquera. Moreover, applied research is conducted on the cocoa-bean crops and the projects developed have permitted improving the yields in Cocoa-bean production per hectare of up to 70%. The Farallones coffee processing central plant, a project developed by the Andes Coffee Growers Cooperative and the Coffee Business, has allowed the coffee farmers to perform the coffee pulp-removal, washing and drying processes with a water consumption reduction of 90%, going from approximately 35 liters to only 4 liters per kilogram of dry coffee.*

**Scope of measures allocated to mitigate water consumption**

Measures allocated to mitigating water consumption cover a majority of types of water use:  
- Agricultural practices  
- Industrial water (used for processes in production)

**Means allocated to mitigate water emissions**

The company has set up monitoring systems for its water emissions, and has technological systems in place such as end-of-pipe processes to reduce its impacts.

*Nutresa monitors its suspended solids discharges into water and chemical oxygen demand. Moreover, it invests in treatment systems of industrial wastewater to improve the quality of the dumpings.*

**Scope of measures allocated to mitigate water emissions**

Measures allocated to mitigating water emissions cover only one type of water use:  
- Industrial water (used for processes in production)

**Direct water consumption**

The company's water consumption, normalised to sales/production, has decreased but not continuously over the past three years.

*The Company water consumption over turnover has decreased by 27% between 2014 and 2016.*

**Solids discharged into water**

*The company's suspended solids discharges into water, normalised to sales, have increased over the past three years by 220,465% between 2014 and 2016.*

**Other effluent discharges into water (Phosphorus, Nitrogen, Chloride)**

The company does not disclose quantitative data on phosphorus/nitrogen/chloride discharges into water.

**Wastewater Chemical Oxygen Demand (COD)**

*The company's wastewater chemical oxygen demand, normalised to sales, has increased over the past three years by 61% between 2014 and 2016.*

**Wastewater Biological Oxygen Demand (BOD)**

*The company's wastewater biological oxygen demand, normalised to sales, has increased over the past three years by 82% between 2014 and 2016.*

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

<b>Leadership</b>	<b>65</b>
<b>Relevance</b>	<b>65</b>

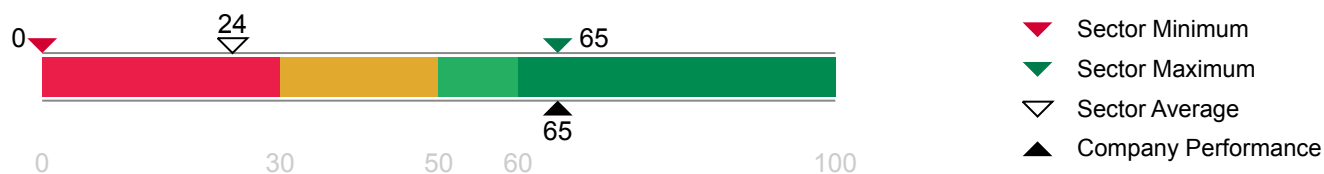
<b>Implementation</b>	<b>60</b>
<b>Means &amp; resources</b>	<b>65</b>
<b>Scope</b>	<b>48</b>

<b>Results</b>	<b>18</b>
<b>Performance</b>	<b>18</b>



**ENV2.2 Minimising environmental impacts from energy use and related emissions**

(score: 65, weight: 2)



**Relevance of the company's commitment in terms of reducing its energy consumption.**

The company has set quantified targets with regard to its energy consumption, and these cover the entire group.

*Nutresa established goals for 2020 such as 25% reduction of energy consumption per ton produced compared to 2010 and achieving 100% of energy supply from cleaner energies.*

**Relevance of the company's commitment in terms of reducing its energy-related emissions.**

The company has set quantified targets with regard to its related CO2 emissions, and these cover the entire group.

*The Company set up a goal for 2020 reducing 33% CO2 eq/per Ton.*

**Means allocated**

The company works to optimize its production processes, in order to reduce its energy consumption and/or its related emissions.

*In the Ice Cream Business, an aspect worth highlighting is the progressive replacement of commercial refrigeration equipment that use R134a refrigerants with environmentally friendly equipment that use R290 refrigerants. This action has allowed an emission reduction of 861 tons of CO2eq/year. As regards thermal energy, the company invested in more efficient equipment for combustion, uses waste heat streams and conducted several automatization and process standardization that allowed energy savings. The company uses natural gas and biomass energy.*

**Coverage**

The company has taken such measures at a majority of sites.

*The Company mentions measures for Colombia and Costa Rica (accounting for more than 60% of revenues).*

**Energy consumption**

*The Company's energy consumption over turnover has decreased continuously by 20% between 2014 and 2016.*

**CO2 emissions linked to energy consumption**

*The company's CO2 emissions (direct and indirect) linked to energy consumption, normalised to turnover has decreased continuously by 23% between 2014 and 2016.*

Leadership	65	Implementation	65	Results	65
Relevance	65	Means & resources	65	Performance	65
		Coverage	65		

ENV2.4 Management of other atmospheric emissions

(score: 33, weight: 2)



Relevance of the company's commitment in terms of reducing other atmospheric emissions.

The company has set quantified targets with regard to its other atmospheric emissions, and these cover the entire group.

*The Company has set up a goal for 2020 to reduce CO2 equivalent emissions per ton by 33%.*

Means allocated

The company has set up monitoring systems for its other atmospheric emissions.

*The company has also replaced commercial refrigeration equipment that use R134a refrigerants with environmentally friendly equipment that use R290 refrigerants.*

Coverage

The company has taken such measures only in a limited number of sites.

*The Company has taken measures in some production processes of a limited number of products such as the "Tosh brand" in Colombia and Costa Rica.*

Greenhouse gas emissions not related to energy consumption

*The company's greenhouse gas emissions not related to energy consumption, normalised to sales, have decreased but not continuously over the past three years by 16% between 2014 and 2016.*

CFC and HCFC emissions

*The company's CFC and HCFC emissions, normalised to sales, have increased over the past three years by 145% between 2014 and 2016.*

<b>Leadership</b>	65	<b>Implementation</b>	18	<b>Results</b>	15
Relevance	65	Means & resources	30	Performance	15
		Coverage	0		

**ENV2.7 Management of environmental impacts from transportation**

(score: 40, weight: 3)



**Relevance of the company's commitment with regard to the environmental impacts related to the transport of its products**

The company's commitment to reduce the environmental impacts related to the transport of its products is general.

**Means allocated to minimising the environmental impacts from transportation**

The company has set up some relevant measures to reduce its environmental impacts related to the transport of its products:  
 - Measures to reduce pollution: the company acquired two 100% electric vehicles that operate in distribution of snacks and incorporated six automatic-transmission vehicles, which help to reduce consumption during driving, into the primary transport fleet. In addition, the company installed equipment that generated hydrogen from an electro-chemical process in one of the cargo-transport vehicles.  
 - Awareness raising programmes for commercial partners related to the environmental impacts of transportation: Grupo Nutresa performed a sensitization to third parties at 24% of mass transit, about the environmental impact and how to measure the carbon footprint.

**Coverage**

The company has taken such measures in a minority of sites/for a minority of products.

**CO2 emissions related to transportation**

CO2 emissions from transportation have decreased significantly.  
 The CO2 emissions from transport normalised to turnover decreased by 47% between 2014 and 2016.

**Trend in transport mix**

Information obtained from company and public sources regarding the company's transport mix is insufficient to determine a trend.  
 The Company uses Air travels to transport employees and Cars and trucks to transport and distribute products.

<b>Leadership</b>	<b>30</b>	<b>Implementation</b>	<b>30</b>	<b>Results</b>	<b>60</b>
Relevance	30	Means & resources	30	Performance	100
		Coverage	30	Trends	0

**ENV3.1 Management of environmental impact from disposal of packaging**

(score: 43, weight: 2)



The company commits to address eco-design of packaging and includes environmental requirements for its packaging suppliers.

**Relevance of commitment to packaging eco-design**

*The Company's goal for 2020 is to reduce 12% packaging material / per ton produces based on a 2010 baseline. Additionally, the Company discloses in its Sustainable Packaging Policy that they work with suppliers throughout the supply chain, promoting good environmental practices and supporting strategies to close the materials cycle.*

**Means allocated to packaging eco-design**

*The company has implemented some measures to identify its impacts from product's packaging OR integrates some elements of eco-design into its product's packaging:*

- Reducing weight/ optimising volume of primary and/or secondary packaging: due to the eco- design strategies it has been implemented which cause a decrease in the consumption of packaging materials trough the reduction of material thickness and dimensions and through a higher efficiency in the industrial processes.
- Increasing the amount of recycled material in primary and/or secondary packaging: the Company uses EarthPact paperboard, which is fully manufactured with sugar cane bagasse, and it is recyclable, biodegradable and fluorochemical -free.
- Increasing the amount of biodegradable or renewable materials in primary and/or secondary packaging :the Company uses EarthPact paperboard, which is fully manufactured with sugar cane bagasse, and it is recyclable, biodegradable and fluorochemical -free.
- Increasing the level of recyclability of primary and/or secondary packaging: The waste recovery level was increased and the goal established in 2020 was achieved with the percentage of 90.1% in the indicator for the solid waste generated.

**Coverage of measures linked to packaging eco-design**

The company has only taken eco-design measures for a minority of its products' packaging.

*The Company only mentioned Colombia and Mexico in its measures.*

**Performance in terms of packaging waste eliminated thanks to eco-design measures**

The company does not disclose data on the quantity of packaging waste eliminated thanks to eco-design measures.

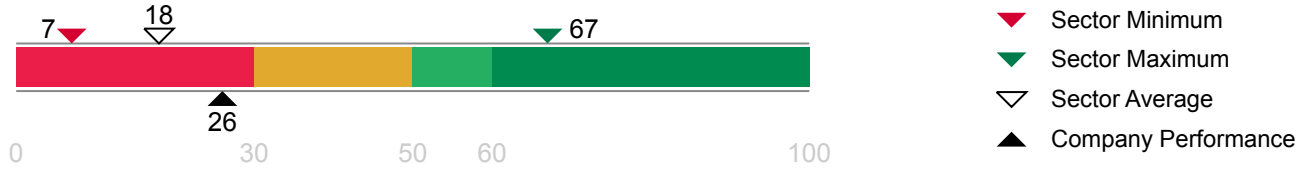
Leadership	100	Implementation	30	Results	0
Relevance	100	Means & resources	30	Trends	0
		Coverage	30		

Human resources

Score: 36

HRS1.1 Promotion of labour relations

(score: 26, weight: 2)



Visibility of commitment

The company has issued a formalised commitment to promote labour relations in its Policy and Management System Human Rights.

Relevance of commitment

The company commits to consulting employee representatives.

The Human Rights Strategic Committee held 14 discussion sessions with representatives of the employees, collective agreement teams and unions from the Colombian companies.

Ownership of commitment

The Human Rights Strategic Committee is responsible.

Coverage of employee representative bodies

Information obtained from company and public sources regarding the percentage of sites where employee representation structures are in place is insufficient.

Subjects covered by collective bargaining

Information obtained from company and public sources regarding the subjects covered in collective bargaining is insufficient.

- health & safety
- CSR issues
- remuneration
- working hours
- training
- career development
- work time flexibility
- employability/life long learning
- stress management
- equal opportunities

Employee representative bodies in countries with restrictive legislation

Information obtained from company and public sources regarding how the company promotes employee representation in countries with restrictive legislations is insufficient.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 10/2017, Grupo Nutresa SA did not appear to be involved in any controversy related to this sustainability driver

## Coverage of collective agreements on working conditions

Information obtained from company and public sources, regarding the percentage of the company's employees covered by collective agreements on working conditions, is insufficient.

Leadership	55	Implementation	0	Results	22
Visibility	65	Means & resources	0	Performance	22
Relevance	65	Scope	0		
Ownership	30	Coverage	0		

**HRS2.3 Responsible management of reorganisation**

(score: 28, weight: 3)



**Relevance of commitment to manage reorganisations responsibly** The company does not disclose any commitment to manage reorganisations responsibly.

**Involvement with employee representatives** The company does not disclose any commitment to inform and consult employee representatives on reorganisations.

**Means allocated to prevent and manage reorganisations**  
*The company has allocated significant measures to limit the impacts of reorganisations:*  
 - internal mobility programme  
 - outplacement services

**Coverage** *There is no evidence that such measures are taken for a majority of employees affected by reorganisations.*

**Stakeholders' feedback**  
 A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.  
*As of 10/2017, Grupo Nutresa SA did not appear to be involved in any controversy related to this sustainability driver*

**Result of the company's commitment to manage reorganisations responsibly** The company does not provide any information on the impacts of reorganisations on employment.

<b>Leadership</b>	0	<b>Implementation</b>	48	<b>Results</b>	35
Relevance	0	Means & resources	65	Performance	35
Ownership	0	Coverage	30		

**HRS2.4 Career management and promotion of employability**

(score: 39, weight: 2)



**Visibility of commitment**

*The company makes some general statements promoting career management and training in its Annual Integrated Report.*

**Relevance of commitment**

The company's commitment to promoting career management and training is general.

- Anticipate short and long-term employment needs and skill requirements
- Adapt employees' skill sets to their career paths
- Enable the progressive improvement in employees' qualification levels
- Put in place a concerted career management framework, which is transparent and individualized

**Ownership of commitment**

It is unclear whether the Head of HR is part of the company's Board or Executive Committee and/or whether line managers are evaluated on their performance in terms of HR management.

**Career management systems**

*The company has formalised the skill requirements for the various job positions. Moreover, employees have regular performance assessment interviews. The company began the implementation of a human-talent information system with a performance module that will allow to locate employees in the competencies vs. performance matrix, as well as identify the performance curve in which they are found.*

**Coverage of career management systems**

These career management systems cover a majority of the company's employees.  
*In 2016, 52.8% of employees received performance evaluations.*

**Types of training provided to non-managers**

The training programmes are mostly aimed at adapting employees' skills to the requirements of their current position.  
*A Contractor Management diploma course was organized with the participation of 30 employees.*

**Means allocated to training for all employees**

*The number of training hours over the number of employees has increased by 7% between 2012 and 2016.*



## Mobility / turnover

*The Company's turnover rate has increased by 1.6 percentage points between 2014 and 2016. The number of promotions in the company has increased by 28% between 2014 and 2016.*

## Training delivered during the year under review

The majority of the company's employees received training during the year under review.

*The percentage of employees having received training increased by 19.3 percentage points between 2014 and 2016 to stand at 52.8%.*

<b>Leadership</b>	<b>21</b>	<b>Implementation</b>	<b>56</b>	<b>Results</b>	<b>39</b>
Visibility	30	Means & resources	65	Performance	39
Relevance	30	Scope	30		
Ownership	0	Coverage	65		

**HRS3.2 Improvement of health and safety conditions**

(score: 54, weight: 2)



**Visibility of health & safety commitment**

The company has made a formalised commitment to health and safety issues in its Policy and Management System Human Rights.

**Relevance of commitment**

The company's commitment addresses its main responsibilities:

- Ensure awareness about health and safety issues
- Reduce the number of work accidents and their severity
- Prevent occupational disease

**Ownership of commitment**

The commitment applies throughout the company, supported by senior management. In addition, responsibility for commitments is allocated to a dedicated structure or local managers are held accountable.

Responsibility for commitments is allocated to the ProHealth Committees, the Primary Committees in Occupational Safety and Health, the Health and emergency Brigades and the Human Rights Committees.

**Means allocated to health and safety**

The company has allocated means to address these issues, including a certified health and safety system:

- awareness raising programmes: Five jobs were identified as having the highest occupational risk in the Colombian companies: picking, manual palletization, packaging, loading and unloading, and stowage. A work plan was created for 2017, focusing on prevention and intervention.
- Internal monitoring : Nutresa has an internal monitoring of the accident rate in the company
- Risk assessment: the company, through the ProHealth committee, the primary committees and the Human Right committee, has identified high-impact risks linked to health and safety
- internal H&S audits
- OHSAS 18001 certifications: Nine companies have been granted the OHSAS 18001 certification

**Coverage of health and safety system**

The health and safety measures cover a minority of the company's employees.

Nine of the company's 40 operation centers are under the OHSAS 18001 certification.

**Means allocated to reduce stress at work**

The company has allocated significant means to address stress at work, including:

- Monitoring of absenteeism/rate of occupational disease: Grupo Nutresa implemented a standardized methodology to assess the future economic impact of absenteeism due to occupational diseases.
- Identification of stress sources: Grupo Nutresa has measurement systems which includes psychological risk evaluation
- Stress support instruments: promoting healthy habits and life styles, management

*matrix of risk and dangers, development teams, active breaks, sports and recreation programmes, and psychological support are implemented by Nutresa.*

**Coverage of means allocated to reduce stress at work** The measures allocated to address stress cover the majority of the company's employees.

**Accident frequency rate** *The Company's Lost - time injury frequency rate for direct employees has decreased by 15% between 2014 and 2016.*

**Accident severity rate** The company does not disclose quantitative data on accident severity rates.

**Other health and safety indicators** *The rate of absenteeism has been stable between 2014 (2.2%) and 2016 (2.3%).*

**Stakeholders' feedback** A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral  
*As of 10/2017, Grupo Nutresa SA did not appear to be involved in any controversy related to this sustainability driver*

<b>Leadership</b>	<b>65</b>	<b>Implementation</b>	<b>56</b>	<b>Results</b>	<b>40</b>
Visibility	65	Means & resources	65	Performance	40
Relevance	65	Coverage	43		
Ownership	65				

Human rights

Score: 47

HRT1.1 Respect for human rights standards and prevention of violations

(score: 49, weight: 3)



Visibility of commitment

The company has issued a formalised commitment to respect and promote human rights in society in its Policy and Management System Human Rights.

Relevance of commitment

The company's commitment to respect and promote human rights in society addresses only part of its responsibilities  
- Prevent complicity in human rights violations.

Ownership of commitment

The commitment applies throughout the company, supported by senior management. In addition, other employees are directly involved or a dedicated structure is in place.

The Company several committees in place to to address Human rights:  
- Human Rights Strategic Committee  
- Strategic Committee  
- Tactical Committee (in charge of identifying risks, managing them and creating reporting mechanisms)

Means allocated

The company has set up a basic system to ensure the respect and promotion of human rights in society that includes:  
- Training programmes for employees : 4,499 employees received training in fields of the human right agreement.  
- Monitoring /grievance mechanisms: The Tactical Committee is in charge of identifying risks, managing them and creating reporting mechanisms with the purpose of analysing the possible violation cases and applying the due process.

Coverage

The company has set up such systems in parts of its operations, including in some high-risk areas in terms of human rights abuses.

The company has set up such systems in parts of its operations, including in some high-risk areas in terms of human rights abuses, including Columbia.

Scope of measures

These measures cover some of the company's relevant human rights issues:  
- Prevention of complicity in human rights violations

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 10/2017, Grupo Nutresa SA did not appear to be involved in any controversy related to this sustainability driver

Leadership	51	Implementation	30	Results	65
Visibility	65	Means & resources	30	Performance	65
Relevance	30	Scope	30		
Ownership	65	Coverage	30		

**HRT2.1 Respect for freedom of association and the right to collective bargaining**

(score: 53, weight: 3)



**Visibility of commitment**

The company has issued a formalised commitment to freedom of association and the right to collective bargaining in its Policy and Management System - Human Rights.

**Relevance of commitment**

The company's commitment addresses its main responsibilities:  
 - Respect and protection of freedom of association and the right to organize (ILO C87)  
 - Respect and protection of the right to collective bargaining (ILO C98)

**Ownership of commitment**

The commitment applies throughout the company, supported by senior management. In addition, other employees are directly involved.

The CEO participates in the strategy for managing collective bargaining and the people in charge of human talent management. In addition, the Human Rights Strategic Committee is involved in discussion sessions with representatives of the employees, collective agreement teams and unions from the Colombian companies.

**Monitoring the respect of freedom of association throughout operations**

The company has implemented limited measures to monitor the respect of freedom of association within its operations:  
 - Occasional risk mapping : the company identifies the principal workplaces of Nutresa where freedom of association and the right to collective bargaining could be violated or threatened.  
 - On-going monitoring of labour rights risks: Human rights management is responsible for monitoring risks.

**Coverage**

The company has set up such systems/programmes in parts of its operations, including in some high-risk areas in terms of labour rights.

The company has set up such programmes in parts of its operations, including in some high-risk areas in terms of labour rights like Colombia.

**Promotion of collective bargaining**

The company has provided employees with some information on their trade union rights through introductory training, contracts, as part of human rights training, etc.

4,499 employees received training in the fields of agreement, establishment, diversity and inclusion, leadership and labour relations and human rights.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 10/2017, Grupo Nutresa SA did not appear to be involved in any controversy related to this sustainability driver*

<b>Leadership</b>	<b>65</b>
Visibility	65
Relevance	65
Ownership	65

<b>Implementation</b>	<b>30</b>
Means & resources	30
Coverage	30

<b>Results</b>	<b>65</b>
Performance	65

**HRT2.4 Non-discrimination**

(score: 42, weight: 1)



**Visibility of commitment**

The company has issued a formalised commitment to non-discrimination in its Diversity and Inclusion Policy.

**Relevance of commitment**

The company's commitment to non-discrimination explicitly defines most of the categories covered:

- Gender
- Race / ethnicity / nationality
- Social background
- Religion
- Sexual orientation
- Disabilities
- Political opinion
- Age

**Ownership of commitment**

The commitment applies throughout the company, supported by senior management.

The Company has a Coexistence Committee.

**Means allocated:**

The company has set up basic measures to prevent discrimination and promote diversity:

- Training: Leaders are trained to develop skills to manage diversity and inclusion.
- Monitoring: performance indicators such as the share of women in management are monitored.
- Confidential reporting system / grievance procedures : The Company has an Ethics Hotline and Human Rights mailbox.

**Coverage**

There is no evidence that such measures cover the majority of operations.

**Results in terms of gender distribution**

The share of women in management positions has increased but not continuously over the past three years.

The share of women in management positions has increased but not continuously over the past three years by 1.2 percentage points between 2014 (36.7%) and 2016 (37.96%).

**Results in terms of employment of disabled persons**

The share of disabled employees in the total workforce has remained stable over the past three years.

It developed from 0.39% (2014) to 0.55% (2016).



## Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 10/2017, Grupo Nutresa SA did not appear to be involved in any controversy related to this sustainability driver*

<b>Leadership</b>	<b>51</b>
Visibility	65
Relevance	65
Ownership	30

<b>Implementation</b>	<b>30</b>
Means & resources	30
Coverage	30

<b>Results</b>	<b>45</b>
Performance	65
Trends	30

**HRT2.5 Elimination of child labour and forced labour**

(score: 39, weight: 3)



**Visibility of commitment**

The company has issued a formalised commitment to the elimination of child labour and forced labour in its Policy and Management System - Human Rights. In addition, the company is a signatory of the Global Compact but does not communicate on this principle.

**Relevance of commitment**

The company's commitment to the elimination of child labour and forced labour addresses some of its responsibilities:  
 - Define a minimum working age  
 - Ensure that prisoners who work for the company are not forced to

**Ownership of commitment**

The commitment applies throughout the company, supported by senior management.

**Means allocated**

Information obtained from company and public sources regarding systems in place to prevent the use of child labour and forced labour is insufficient.

- Awareness raising / training
- Ad hoc monitoring
- Permanent monitoring
- Disciplinary procedures / corrective measures
- Pro-active measures

**Coverage**

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 10/2017, Grupo Nutresa SA did not appear to be involved in any controversy related to this sustainability driver

<b>Leadership</b>	<b>51</b>	<b>Implementation</b>	<b>0</b>	<b>Results</b>	<b>65</b>
Visibility	65	Means & resources	0	Performance	65
Relevance	65	Coverage	0		
Ownership	30				

Community involvement

Score: 40

CIN1.1 Promotion of the social and economic development

(score: 30, weight: 2)



Visibility of the policy

The company makes references to promote local social and economic development in its corporate literature. However, the visibility of this policy is lowered by its absence of formalisation.

Relevance of commitment

*The company's commitment to promote local social and economic development addresses only part of its responsibilities:*  
 - Promote the creation and development of local businesses.  
 - Promote the employment and training of local personnel

Ownership of commitment

The commitment applies throughout the company, supported by senior management.

Means allocated

*The company has allocated some means to address social and economic development, including:*  
 - Financial resources: Nutresa reports that it invests to support rural development projects of farmers in Colombia.  
 - Actions to support local production: the company favours local suppliers, provided they comply with the Code of Conduct for suppliers.  
 - Education : the company implemented formal-education and digital-literacy projects that benefited more than 2,400 community leaders. Moreover, Nutresa provides technical, social and business advices to farmers to help them developing their Cocoa crops.

Geographical coverage

*The Company mentions Mexico and Colombia, however, there is no evidence that a majority of impacted communities in these countries are covered by such measures.*

Performance trend

The company reports indicators on social and economic development, but no historical data is visible.

*Alliances to promote urban agriculture and create opportunities of self-consumption of vegetables, reportedly benefitted more than 672 families.*

Transparency of tax reporting

The company reports only on gross taxes paid. There is no breakdown on a regional or country basis.

- taxes paid in some countries of operations
- taxes paid in some regions of operations
- taxes paid in key regions of operations

- taxes paid in key countries of operations
- sales per zone
- operating profit per zone
- number of employees per zone
- ratio between tax paid and headline corporate tax rate per zone
- explanation for significant differences between tax rate actually paid and expected tax rate

**Presence in IMF 'offshore financial centers' and/ or jurisdictions considered by the OECD as not compliant enough with tax transparency rules** Information on the company's presence in IMF 'offshore financial centres' and/ or jurisdictions considered by the OECD as not compliant enough on tax transparency rules, is not sufficient.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

*As of 10/2017, Grupo Nutresa SA did not appear to be involved in any controversy related to this sustainability driver*

<b>Leadership</b>	<b>30</b>
Visibility	30
Relevance	30
Ownership	30

<b>Implementation</b>	<b>30</b>
Means & resources	30
Coverage	30

<b>Results</b>	<b>30</b>
Performance	30
Trends	30

**CIN2.1 Access to products and combating health problems linked to food**

(score: 46, weight: 3)



**Visibility of the company's policy to promote access to products for vulnerable people** *The company has issued a formalised and accessible commitment to increase access to its products for vulnerable people in its Nutrition Policy.*

**Exhaustiveness of the company's policy to promote access to products for vulnerable people**  
 The company commits to increase access to its products with a strategy that adapts marketing to vulnerable populations.  
*The company commits to developing options for affordable products. In addition, Nutresa commits to cooperate with Food Banks. The company has set target to have 120 capability-development projects by 2020 in the following areas:*  
 - Banks implemented Good Manufacturing Practices  
 - Education institutions with healthy lifestyles  
 - Number of Education Secretariats trained in the healthy lifestyles strategy  
 - Projects funded with development of capabilities

**Visibility of the company's policy to combat health problems linked to food** *The company has issued a formalised and accessible commitment to combat health problems linked to food in its Nutrition policy.*

**Exhaustiveness of the company's policy to combat health problems linked to food**  
 The company has a commitment to adapt its products, and also to prevent and mitigate health problems linked to food.  
*Nutresa reports to constantly work on reformulating its portfolio and developing new products that satisfy nutrition, health and wellness needs. The company refers to the global challenges of overweight and malnutrition as indicated by the World Health Organization (WHO). Nutresa has incorporated into its 2020 Strategy the commitment to multiply by 2,5 the portfolio of products that meets a healthy profile standard.*

**Ownership of commitments**  
 The commitment applies throughout the company, supported by senior management.  
*The company's Vidarium Team is responsible for generating and managing knowledge on nutrition and healthy eating as well as identifying consumers' nutrition and health needs.*

**Means allocated to promote access to products for vulnerable people**  
*The company has allocated some measures to promote access to products for vulnerable people:*  
 - Providing gifts: Nutresa provides products to food banks. Nutresa works with the National Association of Food Banks of Colombia to strengthen their capacity regarding classification, organisation and preparation of products, implement good manufacturing practices and qualify the teams to comply with national legislation.  
 - development of specific products for vulnerable customers: The nutrition initiatives will continue to contribute to the fulfilment of SDG2 "Zero Hunger" through the

implementation of nourishment systems and the promotion of urban and rural self-consumption. The challenge for 2017 will be to achieve the installation of more than 5.000 m2 of vegetable gardens in Montes de María, Chocó y Sierra Nevada de Santa Marta.

- building new delivery systems: Seven rural nourishment systems were established, allowing the communities to have access to healthy and nutritious food products.

**Geographical Coverage (access to products for vulnerable people)**

Nutresa reports to have provided assistance to Colombian food banks as well as other food banks in seven additional countries where it operates, including for example Mexico, Guatemala and Ecuador. However, there is no evidence that other measures are allocated in a majority of countries.

**Means allocated to combat health problems linked to food**

The company has allocated significant measures to combat health problems linked to food:

- Reduction of portion sized: Nutresa reports that it adjusted the size in its chocolate candy bar to the recommended portion of 25g.
- Change in the composition of products: 143 sodium reformulations, 78 sugar reformulations and 116 fat reformulations were made.
- Training/ awareness raising programmes for customers (balanced diet, etc.): The Organization continued to develop the campaign called "Disfruta una Vida Saludable" (Enjoy a healthy life), and it also continued to work on the project focused on educating infants in healthy life habits in Colombia and on the strategy called "Espacios Saludables" (Healthy Environments) in Mexico and Chile. Progress was made in the implementation of the Healthy Organization model within the companies.
- Collaboration with scientific sector: The company's research centre Vidarium collaborates with research institutions. For example Vidarium worked with the University of Antioquia Research Group in Food and Human nutrition on the topic of obesity.

**Geographical coverage (health problems linked to food)**

There is no evidence that these measures are allocated for a majority of the company's product portfolio.

**Performance trend for means allocated to promote access to products for vulnerable people.**

In 2016, the company reports that 12 food banks achieved scores higher than 90% in the application of the PHS (abbreviation in Spanish for Hygienic-Sanitary Profile) in Colombia and three more scored higher than 60% in the strategic region.

**Performance trend for means allocated to combat health problems linked to food**

- The company reports that in 2016:
- a total of 2.945 product references adjusted to the Nutresa nutritional profile was achieved, which is equivalent to 63% of the total sales.
  - 85,8% of the portfolio has been covered with the front-panel label, which is equivalent to 3.432 product references, responding to self-regulation in most cases and to the mandatory labeling where it is still in force.
  - 143 sodium reformulations, 78 sugar reformulations and 116 fat reformulations were made.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

As of 10/2017, Grupo Nutresa SA did not appear to be involved in any controversy related to this sustainability driver

Leadership	58	Implementation	39	Results	42
Visibility	65	Means & resources	48	Performance	65
Relevance	65	Coverage	30	Trends	30
Ownership	30				

Business behaviour (C&S)

Score: 43

C&S1.1 Product Safety (process and use)

(score: 47, weight: 3)



Visibility of commitment

The company has issued a formalised commitment to food safety in its Nutrition Policy.

Relevance of commitment

The company's commitment addresses food safety in line with recognised standards (HACCP method).

Ownership of commitment

The commitment applies throughout the company, supported by senior management.

Relevance of the company's policy on transparency regarding the use of nanotechnologies in packaging or in products

It is unclear whether the company is involved in nanotechnologies.

Food safety management systems

The company has allocated significant resources to ensure food safety that include:

- Internal audits of production processes : internal audits are conducted within the Nutresa's Integrated Quality Policy.
- Application of HACCP method : the company implements the Hazard Analysis and Critical Control Points System in 20 operation centres.
- External audits of production processes, in terms of product safety : external audits of clients are conducted within the Nutresa's Integrated Quality Policy.
- R&D to improve product safety : R&D centres and application laboratories work in the centres investigate topics of food safety.
- Sector-specific certification scheme : five of the Nutresa companies incorporated the ISO 1001 "Family-Responsible company" and "Healthy Organizations" standard. There are 28 operation centres with ISO 9001 Quality. There are 10 operation centres with BPM (Good Manufacturing Practices)

Crisis management system

The company has a system to alert its customers.

The company assures it has an approved crisis and risk management process to ensure a response to crisis events arising from third parties. This process includes a functional structure, periodic training plans and protocols for the different segments of employees.

Coverage of Food safety management systems

The company has set up such systems throughout the company.

Transparency and trends of indicators relative to product safety

The company does not disclose any indicator relative to the outcomes of its product



safety policy.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

<b>Leadership</b>	<b>52</b>
Visibility	65
Relevance	54
Ownership	30

<b>Implementation</b>	<b>53</b>
Means & resources	48
Coverage	65

<b>Results</b>	<b>35</b>
Performance	65
Trends	0

C&S1.2 Information to customers

(score: 61, weight: 3)



Visibility of commitment on commercial communications

The company has issued a formalised commitment to adequately inform customers about its products in its Nutrition Policy and Markets auto-regulation and Advertising Policy (Política de Auto Regulación De Mercadeo y Publicidad).

Relevance of commitment

The company's commitment addresses its main responsibilities:

- Promote responsibility in advertising, marketing and communication
- Ensure transparent labelling of products
- Refrain from targeting children and adolescents in promotional activities: the advertising self-regulation was applied for children under six years old and the commitment is to increase the self-regulation up to the age of 12 in 2017.

Ownership of commitment

The commitment applies throughout the company, supported by senior management. In addition, other employees are directly involved.

The implementation is the responsibility of each of the Group companies, with the support of the Risk Management and Insurance Management of Servicios Nutresa. Meanwhile, supervision is carried out by the Committees Business Presidency, the Corporate Committee and the Finance Committee, Audit and Risk Board Group.

Responsible marketing and commercial practices

The company has internal procedures in place to ensure responsible marketing and commercial practices, which includes:

- Awareness raising of sales/marketing staff
- Training of sales and marketing staff
- Dissemination of guidelines (Code of marketing) promoting responsible communication/advertising to advertising agencies, media channels

Systems to monitor information provided on Health and Nutrition

The company has set up a passive information system to ensure customers are informed about product content:

- Detailed information on products on website
- Transparent labeling of products on content information

Coverage of systems to monitor information provided on Health and Nutrition

There is no evidence that the company has set up such systems in the majority of markets where it operates.

Internal reporting on non-compliance incidents.

The company discloses quantitative data on the marketing non-compliance incidents reported internally and on how they were handled:

In 2016 there were no cases of noncompliance with the regulations and voluntary codes with regard to labeling and marketing communications.

## Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

<b>Leadership</b>	<b>65</b>	<b>Implementation</b>	<b>41</b>	<b>Results</b>	<b>77</b>
Visibility	65	Means & resources	45	Performance	77
Relevance	65	Coverage	30		
Ownership	65				

C&S2.2 Sustainable Relationships with suppliers

(score: 28, weight: 2)



Visibility of commitment

The company does not disclose any commitment to establish sustainable relationships with its suppliers/subcontractors.

Relevance of commitment

Ownership of commitment

Measures established to manage supplier relations

The company has allocated significant resources to manage sustainable relations with its suppliers that include:

- Training: 3 workshops were organized and held and 54 inclusive business development initiatives were identified to be developed with suppliers.
- Technical assistance: The Organization provided 146 training sessions in order to achieve technological transfer of 2.792 farmers by means of a specialized equipment for the agronomic management of cocoa plantations.
- Financial assistance: The Organization updated the technological platforms used for addressing the requirements of the suppliers and engaging them through the contact center. In 2016, Grupo Nutresa addressed 31.368 cases, from which 6.137 were associated with the support of logistical, financial and quality-related services. Additionally, the "Cacao para el futuro" private fund is a project that gathers private actors that contribute the capital, farmers that contribute the labor and the forest cover of their plantations and experts that ensure the technological package for the adequate sowing, harvesting and processing of cocoa with the purpose of developing the capabilities and improving the quality of life of cocoa growers. In 2016, COP 5,81 billion were invested in this endeavor. Currently, the Fund includes 57 farmers from 11 municipalities who farm 976 hectares.
- Verification systems to ensure respect of payment delays : Currently, a project is being developed with the purpose of achieving a 100% digital engagement with the suppliers, covering the virtual process from the negotiation to the payment. Furthermore, the internal information management processes will use multi-dimensional analysis systems in order to ensure the traceability of the entire supply chain.
- Joint development projects: Within the framework of the supplier development program for companies that are members of the ANDI (Colombian Industrialists Association), in 2016 the Organization started working jointly with four suppliers on strengthening the competitiveness and sustainability of the value chain. This work included the implementation of improvement projects by means of the Decalogue for Supplier Development, a methodology presented by the CTA (Antioquia's Technology Center), which is the institution in charge of the program

Coverage

There is no evidence that a majority of suppliers are covered. The Company reports on some initiatives in Chile, Costa Rica and Colombia.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

*As of 10/2017, Grupo Nutresa SA did not appear to be involved in any controversy related to this sustainability driver*

**Transparency and trends of indicators relative to the outcomes of the company's commitment to ensure balanced and sustainable relations with suppliers**

The company does not disclose any indicator relative to the outcomes of its commitment to ensure balanced and sustainable relations with suppliers.

<b>Leadership</b>	<b>0</b>
Visibility	0
Relevance	0
Ownership	0

<b>Implementation</b>	<b>49</b>
Means & resources	65
Coverage	30

<b>Results</b>	<b>35</b>
Performance	65
Trends	0

**C&S2.3 Integration of environmental factors in the supply chain**

(score: 54, weight: 2)



**Visibility of commitment**

The company has issued a formalised commitment to including environmental factors in supply chain management in its Suppliers Code of Conduct.

**Relevance of commitment**

The company's commitment to environmentally responsible supply chain management includes detailed environmental requirements for suppliers.

**Ownership of commitment**

The commitment applies throughout the company, supported by senior management.

**Means allocated to include environmental factors in supply chain management**

The company has set up awareness-raising and selection measures to address the environmental impacts of its supply chain:

- Communication of environmental expectations and requirements to suppliers: The Company has its own Supplier Code of Conduct where the environmental factors are mentioned.
- Supplier self-assessment : The assessment mechanisms may include self-assessment, in-situ audits or audits carried out by a third party. Target: Achieve critical supplier assessment to cover at least 80% of these suppliers' expenses with a validity less or equal to 3 years.
- Integration of environmental issues into contractual clauses: The Company uses contract clauses to verify the sourcing policy compliance as a verification mechanism.
- Purchasing procedures/ risk assessments for suppliers : Managing responsible sourcing strategies allows Grupo Nutresa to mitigate the risks identified in its purchase categories and which depend on Grupo Nutresa' s own operation or on operations of third parties, such as the high volatility in the prices of direct raw materials, shortage of raw materials due to climate change, noncompliance of quality, safety and sustainability practices, low generational replacement intensified by the migration of farmers to the cities, and infringement of Human Rights as a consequence of practices such as child labor, unfair salaries and forced labor.
- Supplier support (e.g.: training, technical assistance, etc.) : The Organization provided 146 training sessions in order to achieve technological transfer of 2.792 farmers by means of a specialized equipment for the agronomic management of cocoa plantations. Furthermore, cocoa-growing-friendly practices were shared with 6.376 farmers via 282.880 free text messages.
- Workshops: 3 workshops were organized and held in 2016.
- Non-compliance procedures for suppliers (re-auditing, re-training, eventual ending of contracts) : 412 audits were conducted to suppliers and contractors with the aim of assuring compliance, gap closing and capability increase in integrated management systems, as well as commercial, logistic and human management matters according to the standards defined by the Organization. From all the assessments, 30 of them correspond to a new sustainability audit program carried out by the Icontec as an independent institution, evaluating subjects related to Human Rights and labour practices, among other topics.

**Coverage of means allocated to include environmental factors in supply chain management**

The measures implemented cover only a very limited number of purchases/ suppliers.

*The evaluation among suppliers was carried out only in Colombia, Chile and Costa Rica as in the rest of the country where Nutresa operates the company has not yet implemented the classification of risks by category.*

**Audits of suppliers**

Dedicated environmental audits are carried out by external auditors.

*A sustainability-focused audit program was implemented with the aim of supplementing the current supplier audit programs. 30 audits were carried out by the Icontec (Colombian Institute of Technical Standards and Certification).*

**Share of corrective measures vs problems uncovered**

Only a minor share of environmental problems uncovered in the supply chain were addressed by corrective measures.

*The Company has a sourcing policy compliance verification mechanism that includes third-party verification, contract clauses, self-assessment, code of conduct and audit. The environmental criteria assessed are the impact on the flora and fauna, use of hazardous substances, increase in waste generation, increase in the consumption of natural resources, climate variability, negative reaction of stakeholders due to the use of genetically modified organisms, larger amount of atmospheric emissions and animal abuse.*

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

<b>Leadership</b>	<b>56</b>	<b>Implementation</b>	<b>58</b>	<b>Results</b>	<b>48</b>
Visibility	65	Means & resources	82	Performance	48
Relevance	65	Coverage	0		
Ownership	30				

C&S2.4 Integration of labour factors in the supply chain

(score: 60, weight: 3)



Visibility of commitment

The company has issued a formalised commitment to including labour factors in its supply chain management in its Supplier Code of Conduct.

Relevance of commitment

The company's labour requirements for suppliers address the main relevant issues in the sector:

- Freedom of association and right to collective bargaining
- Abolition of child labour .
- Abolition of forced labour
- Non-discrimination
- Health and Safety
- Decent wages
- Working hours

Ownership of commitment

The commitment applies throughout the company, supported by senior management.

Means allocated to include labour factors in supply chain management

The company has set up awareness-raising and selection measures to address the labour standards in the supply chain:

- Communication of labour requirements to suppliers : the company has a program for the development of direct-material suppliers through which it promotes the appropriation of best practices in the different integrated quality-management systems.
- Supplier self-assessment : suppliers conduct self-evaluation on the ten principles of the Global Compact.
- Integration of labour issues into contractual clauses : clauses are included in contracts with third parties and marketers, in which the commitment to promote and respect human rights is clearly expressed.
- Purchasing procedures / risk assessments for suppliers: Managing responsible sourcing strategies allows Grupo Nutresa to mitigate the risks identified in its purchase categories and which depend on Grupo Nutresa' s own operation or on operations of third parties, such as the high volatility in the prices of direct raw materials, shortage of raw materials due to climate change, noncompliance of quality, safety and sustainability practices, low generational replacement intensified by the migration of farmers to the cities, and infringement of Human Rights as a consequence of practices such as child labor, unfair salaries and forced labor.
- Supplier support : Nutresa conducted 199 training sessions for suppliers of raw materials, packing material and some services in 2014. A total of 1425 hours was invested in trainings with 1841 participants.
- Workshops : the company conducts workshops on human rights with 18 producing organizations associated with its value chain.
- Non-compliance procedures for suppliers (re-auditing, re-training, eventual ending of contracts) : 412 audits were conducted to suppliers and contractors with the aim of assuring compliance, gap closing and capability increase in integrated management systems, as well as commercial, logistic and human management matters according to the standards defined by the Organization. From all the assessments, 30 of them correspond to a new sustainability audit program carried out by the Icontec as an independent institution, evaluating subjects related to Human Rights and labour practices, among other topics.



**Coverage of the means allocated to include labour factors in supply chain management**

The measures implemented cover only a very limited number of purchases/ suppliers.

*The measures are only implemented in countries such as Colombia, Chile and Costa Rica.*

**Audits of suppliers**

Dedicated labour audits are carried out by independent, external auditors.

*From all the assessments, 30 audits corresponded to a new sustainability audit program carried out by the Icontec as an independent institution, evaluating subjects related to Human Rights and labour practices, among other topics.*

**Share of corrective measures / problems uncovered**

A significant share of labour problems uncovered in the supply chain were addressed by corrective measures.

*In 2016, 100% of suppliers in Colombia had negative social impacts. The social criteria for the evaluations where the application of legal standards related to staff hiring and inadequate work environment, violation of the freedom of association right and of the collective bargaining right, damage to final consumers' health.*

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

<b>Leadership</b>	<b>56</b>
Visibility	65
Relevance	65
Ownership	30

<b>Implementation</b>	<b>58</b>
Means & resources	82
Coverage	0

<b>Results</b>	<b>65</b>
Performance	65

C&S3.1 Prevention of corruption

(score: 53, weight: 2)



Visibility of commitment

The company has issued a formalised commitment to preventing corruption in its Anti -fraud and anti-corruption policy.

Relevance of commitment

The company's commitment to preventing corruption addresses only part of its responsibilities:

- Giving / receiving bribes
- Gifts and invitations
- Fraud
- Conflicts of interest

Ownership of commitment

The commitment applies throughout the company, supported by senior management.

Involvement of employees

The company has instituted formal training programmes for relevant employees on corruption prevention. More than 17,600 employees and third parties participated in awareness-raising and training activities on risks related to money laundering and terrorist financing.

Means allocated to prevent corruption

The company has set up reporting systems to prevent corruption that include:

- Internal audits (internal verification of compliance with the company's code of conduct etc.) : The Servicios Nutresa Audit and Control Manager and the Services Nutresa Risk, Insurance and Safety Manager will coordinate, conduct and document the fraud and corruption investigations under the guidelines established by the organization; the coordination of these activities may be done with other areas that can contribute to the investigation when considered necessary.
- The possibility to contact internal audit, legal I or compliance departments directly & confidentially a dedicated confidential :Any employees who, because of the process or other circumstance, participates in or learns of any investigation that is taking place or has taken place within Grupo Empresarial Nutresa has the duty to treat the information confidentially and to protect the anonymity of those who have submitted any reports.
- A dedicated confidential hotline or email address: Telephone lines were implemented for the operation of the Ethics Line in the international operations, and a plan was designed for strengthening and socializing this reporting mechanism in 2017.

Coverage of means allocated to prevent corruption

The measures implemented cover all significant parts of the company as well as sales agents.  
Moreover, the hotline and complaints system can be used by third parties.

**Internal reporting on corruption incidents**

The company discloses quantitative data on the corruption incidents reported internally and on how they were handled:

*The Ethics Line addressed 8 cases and the Cohabitation Committees received 12 reports of possible harassment cases, which were subsequently addressed.*

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

<b>Leadership</b>	<b>41</b>
Visibility	65
Relevance	30
Ownership	30

<b>Implementation</b>	<b>41</b>
Means & resources	30
Coverage	65

<b>Results</b>	<b>77</b>
Performance	77

C&S3.2 Prevention of anti-competitive practices

(score: 14, weight: 2)



Visibility of commitment

The company does not disclose any commitment to preventing anti-competitive practices.

Relevance of commitment

Ownership of commitment

Involvement of employees

Information obtained from company and public sources regarding reporting involvement of employees in preventing anti-competitive practices is insufficient.

Information obtained from company and public sources regarding reporting mechanisms to monitor anti-competitive behaviour is insufficient.

Means allocated to prevent anti-competitive practices

- internal audits (internal verification of compliance with the company's code of conduct etc.)
- approval procedures for contract prices etc. by an independent department
- the possibility to contact internal audit, legal or compliance departments directly & confidentially
- a dedicated confidential hotline or email address
- external audits (by an independent, external specialised organisation)
- external investigations of allegations
- risk assessment of vulnerability areas within the company

Coverage of means allocated

Internal reporting on anti-competitive incidents

The company does not disclose any quantitative data on the number or nature of antitrust incidents reported internally.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

<b>Leadership</b>	<b>0</b>	<b>Implementation</b>	<b>0</b>	<b>Results</b>	<b>43</b>
Visibility	0	Means & resources	0	Performance	43
Relevance	0	Coverage	0		
Ownership	0				

**C&S3.3 Transparency and integrity of influence strategies and practices**

(score: 12, weight: 2)



**Visibility towards stakeholders**

The company does not disclose any commitment to ensuring transparency and integrity of lobbying practices.

**Comprehensiveness of the commitment**

**Ownership of commitment**

**Involvement of employees**

Information regarding the involvement of employees in ensuring transparency and integrity of lobbying practices is insufficient.

**Means allocated to promote integrity in lobbying practices**

Information regarding measures allocated to ensure transparency and integrity of lobbying practices is insufficient.

- publication of detailed information on lobbying activities
- approval procedures for gifts, travel or other privilege by an independent department
- a dedicated confidential hotline or email address
- internal monitoring for lobbying budget
- internal audits for lobbying activities
- independent party for monitoring lobbying budget/external audit
- external investigations of allegations
- disclosure of the positions in the period of preparation of a debate and during the debate

**Coverage of means allocated**

**Reporting**

The company does not disclose the budget directly and indirectly dedicated to lobbying practices.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

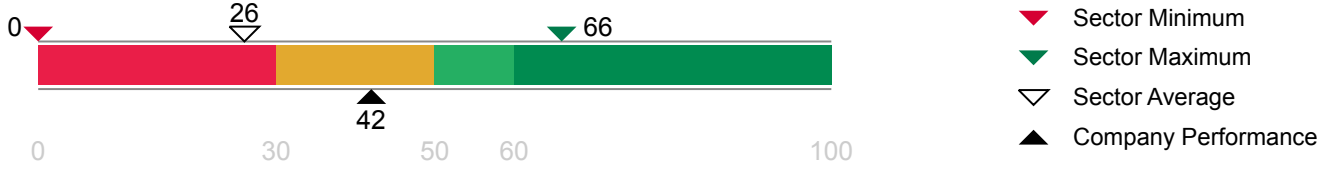
Leadership	0	Implementation	0	Results	35
Visibility	0	Means & resources	0	Performance	35
Relevance	0	Coverage	0		
Ownership	0				

Corporate governance

Score: 43

CGV1.1 Board of Directors

(score: 42, weight: 3)



**[LISTED COMPANIES] Existence and independence of Nomination Committee**

No executive is a member of the committee, but half or fewer are independent.  
No member of the 3-member Nomination Committee is considered independent.

**Independence of the Board Chairman**

The roles of Chairman and CEO are separated, but the chairman is not considered independent.

**Responsibility allocated over CSR issues**

There is a CSR committee that is part of the Board.  
Members of the Strategic Planning and Sustainability Committee are board members.

**Share of independent shareholder-elected Board members**

[LISTED COMPANIES] The Board is between 0 and 20% independent, which might raise concerns.  
1 member of the 7-member Board is considered independent.

**Diversity of the skills and backgrounds of the Board**

The Board of Directors diversity appears to be partial:

- At least 30% of directors are women
- At least 40% of directors are women
- Employee representative(s) sitting on the Board
- Board members with demonstrated professional experience in the company's sector of activities
- Board members with demonstrated expertise on CSR issues

**Training and expertise provided to board members**

Training is provided upon joining the Board.

**Regular election of Board members**

Board members are elected every year.

**Evaluation of Board's functioning and performance**

Performance is evaluated regularly, but with no disclosure on the results.  
The Board of Directors evaluates itself annually and the results are analysed by the Committee of Corporate Governance. Additionally, the firm AtKearney



conducted an external and independent evaluation of the performance of the Board of Directors, however, the periodicity of the external evaluation is evaluated by the board of directors.

**Review of CSR issues at Board meeting**

The formal CSR reporting has been signed by CEO/Chairman/Board, but there is no evidence that relevant CSR issues are reviewed at Board meetings.

- Product safety/Information to customers
- Fundamental human rights
- Labour standards in the supply chain
- Access to products/Combating health problems linked to food
- Environmental issues/ Climate change
- Fundamental labour rights/Reorganisation

**Regularity of and attendance at Board meetings**

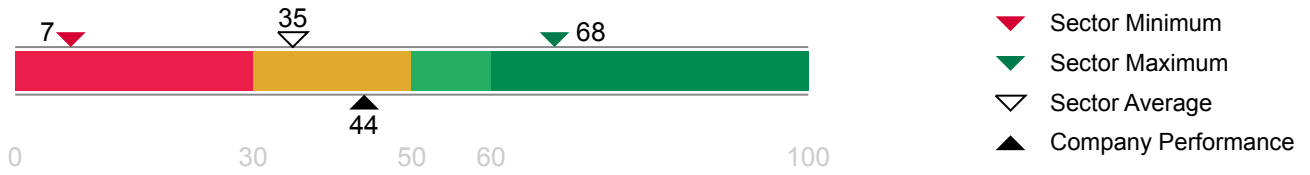
Regular meetings are held, and attendance rates are above 90%

12 Board meetings were held during the last fiscal year and attendance rate was 93.8%.

Name of Board member	Role	Executive	Non executive	Employee representative	Nomination	Audit	Remuneration	Former executive	> 9 years on Board	Stock options	Paid>1/2 executive salary	Represent>3% company's shares	Other	Independency
Antonio Mario Celia	Chairman		X		X	X	X		X					
Jaime Alberto Palaci			X			X			X					
Mauricio Reina Echev			X		X	X	X		X					
Cipriano López Gonzá			X			X								X
David Emilio Bojanin			X		X		X		X				considered non-independent by company	
Gonzalo Alberto Pére			X			X			X				considered non-independent by company	
María Clara Aristizá			X										considered non-independent by company	

CGV2.1 Audit & Internal Controls

(score: 44, weight: 2)



**[LISTED COMPANIES] Existence and independence of Audit Committee** No executive is a member of the committee, but half or fewer are independent.  
1 member of the 5-member Audit Committee is considered independent.

**Skills and backgrounds of Audit Committee members** Members appear to have financial and/or audit experience AND relevant operational experience.

**Operational and CSR risks covered by the company's internal controls system**  
The internal control system covers the standard issues related to financial, operational, and legal risks. In addition, the system covers some of the CSR risks inherent to the company's business operations such as :  
- Product safety/Information to customers  
- Fundamental human rights  
- Labour standards in the supply chain  
- Access to products/Combating health problems linked to food  
- Environmental issues/ Climate change: The Company makes reference to the climate change risks that involved water, geophysics, biological and epidemic risks.

**Role of the Audit Committee in overseeing internal and external controls**  
The Audit Committee has a comprehensive role that includes:  
 Oversee internal audit and internal controls  
 Review accounting policies and be responsible for updates  
 Nominate the statutory auditor  
 Oversee the work of the external auditor  
 Approve the type of audit and non-audit services provided and fees paid to the external auditor

**Management of the CSR risks** Limited processes dedicated to management of CSR risks appear to be in place:  
- materiality assessment

**Independence of the firm's external auditors** Information obtained from company and public sources regarding the independence of the firm's external auditors is insufficient.

**Inclusion of CSR issues in the company's reporting**  
The company publishes significant CSR reporting on key material issues, with an independent third party assessment of the reliability of key performance indicators, with limited level of the assurance. KPMG discloses a verification report that expresses their engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000, Assurance Engagements other than Audits or Reviews of Historical Financial Information, issued by the International Auditing

---

*and Assurance Standards Board.*

---

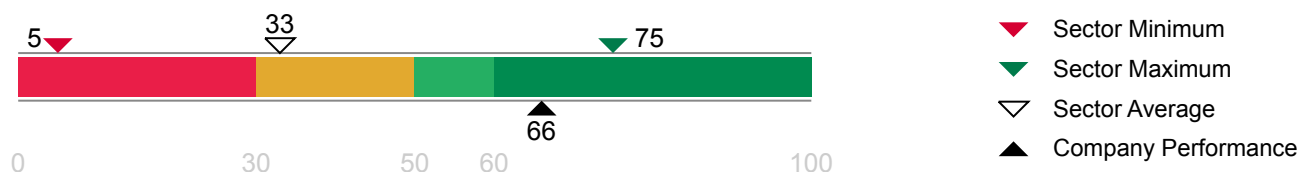
## **Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

*As of 10/2017, Grupo Nutresa SA did not appear to be involved in any controversy related to this sustainability driver*

CGV3.1 Shareholders

(score: 66, weight: 2)



<b>Nonexistence of voting rights restrictions</b>	The company respects the "one share - one vote" principle.
<b>Nonexistence of anti-takeover devices</b>	There is no reference to anti-takeover devices in the company's reporting.
<b>Safeguards on transactions with major shareholder(s)</b>	No safeguards appear to be in place, which might raise concerns with regard to the fairness of any such transaction.
<b>Ability to add items to the agenda of the AGM and to convene an EGM</b>	Major restrictions have been identified to convene an EGM. <i>An extraordinary meeting can be held only on the initiative of shareholders representing at least 25% of the company's capital or on the initiative of shareholders that represent at least 20% of the Nutresa's suscribed shares in the case of discussing whether to take derivative action against members of Company Management.</i>
<b>Access to voting at General Meetings</b>	There are no major restrictions on shareholders' ability to vote, however there is no possibility of voting through online services.
<b>Ability to vote on relevant issues in separate resolutions at AGM</b>	All major items are voted upon in separate resolutions, in accordance with standards advocated by Vigeo.
<b>Presentation of CSR strategy to shareholders and investors</b>	<i>The Company shall present the ordinary meeting of the Shareholders' Assembly with an Annual and Sustainability Report, in which it will report on the management of economic, social and environmental areas within the framework of sustainable development, with relevant information for stakeholders and all those who are interested in knowing it.</i> <i>The company has presented to shareholders and investors its CSR strategy and this covers some of the most relevant CSR issues:</i> - Product safety - Fundamental human rights - Labour standards in the supply chain - Nutrition - Environmental issues
<b>Stakeholders' feedback</b>	A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral  <i>As of 10/2017, Grupo Nutresa SA did not appear to be involved in any controversy</i>

*related to this sustainability driver*

CGV4.1 Executive Remuneration

(score: 20, weight: 2)



**[LISTED COMPANIES] Existence and independence of Remuneration Committee**

No executive is a member of the committee, but half or fewer are independent.

*No member of the 3-member Remuneration Committee is considered independent*

**Disclosure of senior executives' individual remuneration**

Disclosure of individual executive remuneration data for senior executives is insufficient.

**Link between Short Term Incentive Plans and the performance of the company**

Bonuses are linked to predetermined and disclosed economic and/or operational performance indicators. However the actual quantified targets are not disclosed.

*The Company discloses targets such as leadership, economic growth, organizational climate, CSR developments, customer satisfaction, international growth and innovation and new products.*

**Link between the main Long Term Incentive Plan and the performance of the company**

Information on the rules and performance conditions guiding the allocation of long-term incentives to senior executives is insufficient.

**Link between variable remuneration and CSR performance of the company**

*CSR performance objectives are considered in the determination of variable remuneration of senior executives, but information on performance targets are not disclosed:*

- *Environmental issues: specific targets are related to energy and water consumption.*
- *Access to products/Combating health problems linked to food: develop new portfolio of products with high nutritional standards.*

**Severance pay for senior executives**

Information obtained from company and public sources regarding severance pay for senior executives is insufficient.

**Evolution of CEO-to-employee compensation ratio**

Information obtained from company and public sources regarding the compensation of CEO and the average employee salary is insufficient.

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

*As of 10/2017, Grupo Nutresa SA did not appear to be involved in any controversy related to this sustainability driver*

## Detailed Scores and Ratings

### CURRENT AND PREVIOUS RATINGS

Period	Environment	Human resources	Human rights	Community involvement	Business behaviour (C&S)	Corporate governance
2017/10	++	++	++	++	++	+
2015/10	++	++	++	++	++	+
2015/09	++	++	++	++	++	+

### SCORES PER DOMAIN

Domain	Average Score	Leadership	Implementation	Results
Environment	45	57	38	28
Human resources	36	31	41	34
Human rights	47	55	21	63
Community involvement	40	47	35	37
Business behaviour (C&S)	43	38	40	53
Corporate governance	43	48	32	49

### SCORES PER CRITERIA

Sub-domain	Criterion	Score
Environment 1	1	62
	4	23

Environment 2	1	48
	2	65
	4	33

Environment 3	7	40
---------------	---	----

Sub-domain	Criterion	Score
Human resources 1	1	26
Human resources 2	3	28
	4	39
Human resources 3	2	54

Sub-domain	Criterion	Score
Human rights 1	1	49
Human rights 2	1	53
	4	42
	5	39

Sub-domain	Criterion	Score
Community involvement 1	1	30
	1	46

Sub-domain	Criterion	Score
Business behaviour (C&S) 1	1	47
	2	61
	2	28
Business behaviour (C&S) 2	3	54
	4	60
Business behaviour (C&S) 3	1	53
	2	14
	3	12

Sub-domain	Criterion	Score
Corporate governance 1	1	42
Corporate governance 2	1	44
Corporate governance 3	1	66
Corporate governance 4	1	20

## Contacts

Analyst: Maria Ortiz • maria.ortiz@vigeo.com  
Research Manager: Julia Sausen • julia.sausen@vigeo.com

## Disclaimer

### **COPYRIGHT VIGEO EIRIS2018**

Vigeo Eiris provides its clients with information and/or analyses or opinion on factual, quantitative or statistical, managerial, economic, financial, governance, social, or technical data, in relation to companies, brands, products or services, assessed individually or with respect to sectors, regions, stakeholders or specific themes.

Vigeo Eiris, its methodology, brand, and employees, shall under no circumstances, be held responsible for any kind of consequence (including economic, financial, or legal) derived from the interpretation of its information, analyses, opinion, scores, and indicators. The terms of use of our products and services and their impacts stem from the sole responsibility of their users.

The above elements (information, indicators, analyses, scores, and opinion) do not include or imply any approval or disapproval on their content from Vigeo Eiris, its executive officers, or its employees. These elements do not represent in any way a guarantee, or reference of legal, moral, philosophical, ethical or religious nature, supporting or opposing any investment or divestment decision, or any standpoint or opinion expressed in favour of, or against companies, products, services, sectors or regions directly or indirectly mentioned in Vigeo Eiris' deliverables. Our deliverables are not, and should not, be considered as a form of financial advice or recommendation. No investment or divestment decision should be attributed to the information or opinion provided by Vigeo Eiris. Our products and services must only be considered as one of the many elements related to the financial decision making process. Vigeo Eiris, its methodology, brand, and employees, shall under no circumstances, be held responsible for any kind of consequence (including economic, financial, or legal) derived from the interpretation of its information, analyses, opinion, scores, and indicators. The terms of use of our products and services and their impacts stem from the sole responsibility of their users.



## Overview of the latest updates

Date of the latest update	Information updated
2018/07	Carbon & Energy Transition
2017/10	<b>Full ESG profile</b>