



POLICY ON DONATIONS IN FAVOR OF DEMOCRACY AND POLITICAL ACTIVITY

May 24th, 2017

OBJECTIVE

Aim for the healthy exercise of democracy, understanding that political activity is a key element to generate spaces for participation and construction of the future of the country.

SCOPE

The donations made by Fundación Nutresa in favor of democracy and political activity.

PRINCIPLES AND GENERAL CONDITIONS

PRINCIPLES:

- ✓ Our contribution to campaigns is made in the aim to strengthen democracy and institutions, maintaining independence and supporting, with a plural approach, proposals that generate trust in citizens and incorporate good governance practices.
- ✓ We support and participate, maintaining independence, in initiatives governments that have demonstrated transparency and real commitment to development and institutionality, which are our real concern.
- ✓ We do not support candidates with convictions related to corruption practices or national and international bribery, or about whom there are public questions about possible corruption practices, including transnational bribery
- ✓ Contributions are only made to legal or natural persons authorized by the regulations in force, in the accounts where they can legally receive such contributions, in accordance with the procedures established in Attachment III of this Policy, the current electoral regulations and the rules set by the National Electoral Council or whoever takes their place.

Considering that private donations are an important and legitimate source of funding to promote democracy and for political parties and movements to fulfill their objectives, Fundación Nutresa may make donations, following the policies and within the legal framework indicated below:

1. APPROVAL

Donations in favor of democracy and political activity will be approved by the Fundación Nutresa Board of Directors, which, through decisions adopted by the majority of its members, will approve the Budget and the amounts to be donated to each beneficiary.

2. RECIPIENTS

The recipients of the Fundación Nutresa contributions and donations will be chosen according to the following guidelines:

- ✔ The objectives of political participation of the recipients should be aligned with Grupo Nutresa's corporate value and be recognized for a transparent political or professional exercise, framed in ethical principles.
- ✔ Recipients must have programs that include social inclusion, common welfare and social and environmental responsibility.
- ✔ As far as possible, recipients must be incorporated as non – profit entities, whose corporate purpose is associated with the promotion of democracy or duly – constituted political parties or movements; notwithstanding the foregoing, as an exception, some candidates may also be direct beneficiaries of the donation.
- ✔ Try to ensure that the political – activity donations generate tax benefits for Fundación Nutresa; therefore, the beneficiary must comply with the requirements established in the tax legislation.
- ✔ In no event may Fundación Nutresa make direct donations to presidential campaigns, in compliance with the provisions of Law 996 of 2005 and Sentence C – 1135 of 2005.
- ✔ Fundación Nutresa will focus its efforts on funding political activity nationally and preferable – but not exclusively – to the main cities and Departments in the country.
- ✔ The selection of recipients will consider the seriousness of their aspiration and their chances of electoral support or their projection.

This point must be supported by polls published in the media, made by recognized firms that have the respective data sheet.

3. AMOUNT OF DONATIONS AND CONTRIBUTIONS

- ✔ The budget for donations will be determined by the Fundación Nutresa Board of Directors, which – to do this – may establish ranges that address specific electoral moments, the needs expressed by the parties, political movements or non – profit entities. All this is according to the legal standards and amounts established by the National Electoral Council (Consejo Nacional Electoral).

- ✓ The amount of each donation will be established, based on criteria such as:

The development of the party or movement
 The candidate's experience
 The seriousness of the political program or project
 The candidate's personal reputation and the reputation of the political party or movement

TYPE OF FINANCING	MAXIMUM AMOUNT
Political parties or movements in presidential – election periods	450 Minimum Monthly Salaries (Salario Mínimo Legal Mensual Vigente, SMLMV) per electoral period, per political party or movement (*)
Political parties or movements – Senate	300 SMLMV per electoral period, per political party or movement (*)
Political parties or movements – House of Representatives	200 SMLMV per electoral period, per political party or movement (*)
Political parties or movements in election periods for city Mayors or Departmental Governors	Up to 80 SMLMV per electoral period, per political party or movement (*)

(*) Maximum Legal Amounts – The maximum amounts established by the National Electoral Council must be observed in each period and type of campaign for the different constituencies of the Electoral Census.

The maximum amounts of contributions to support the campaigns of Congressional candidates shall not be greater than ten percent (10%) of the total expenditures allowed by the National Electoral Council, established in its Resolution Number 0228, dated January 29, 2013.