

1. **Purpose**

Establish general guidelines to maintain and protect the confidentiality of information of Grupo Bimbo S.A.B. de C.V. and its subsidiaries and affiliates ("Grupo Bimbo" or the "Company") or that of its clients, suppliers or any Third Party that has provided information, ensuring that its use is only for the interest of Grupo Bimbo.

2. **Scope**

This policy applies to all Grupo Bimbo associates and Third Parties that have any relationship with Grupo Bimbo.

3. **Definitions**

Confidential Information: Any information provided in writing or orally, directly or indirectly, through any available means or form, to any associate. This includes all information written, oral, graphic, visual or perceptible by any of the human senses, or contained in written, electronic or electromagnetic media, including, but not limited to, all documentation, inventions, ideas, concepts, models, manufacturing models, prototypes, designs and/or manufacturing plans, methods, process designs, operating conditions, contractual conditions, commercial agreements, negotiations, contracts with third parties, equipment design, technical information, know-how, formulas, industrial secrets, economic processes, market reports, studies, plans, programs, drawings, photographs, videos, research, analysis, compilations, pricing information, terms and conditions concerning equipment, sales, licenses and engineering services, everything related to finance, business and market plans, legal matters, supplier lists, customer lists, potential customers, business prospects, business opportunities, business records, personal assignments, contracts, assets of Grupo Bimbo and/or its affiliates and subsidiaries; in accordance with **GGB-019 Global Information Classification Policy**. Confidential information may also include personal data and/or sensitive personal data; these terms are found in the **FGB-CP-01 Global Personal Data Protection Policy of Grupo Bimbo** as well as information collected, acquired or developed during the term of employment of associates with the Company, including information originated by associates, acting alone or with other Company personnel and/or third parties, which may be considered a trade secret and, therefore, the **GGB-006 Global Policy for the Protection of Trade Secrets** must be observed.

Third parties: Persons or entities that establish a relationship with Grupo Bimbo (e.g. clients, suppliers, agencies, business partners, advisors or any third party intermediary).

4. **Responsibilities**

Associate: Every associate who has access to confidential information must maintain strict confidentiality regarding it.

Safety and Security Department: Identify and correct areas of opportunity in the security protocols of the workplaces, as well as investigate and, where appropriate, report possible violations of confidential information.

Business Technology Department: Identify and correct areas of opportunity in IT security protocols, and provide the necessary technological tools so that functional areas can comply with the policy.

Global Legal and Compliance Department: Provide legal advice to Committee members and associates who require it, in relation to issues of confidential information.

Functional Directions: Establish controls, procedures and training to comply with and enforce this policy, within its scope of operation.

5. General guidelines

Associates

- All Grupo Bimbo associates must:
 - Maintain absolute confidentiality of the confidential information entrusted to them by the Company and Third Parties,
 - Use this information exclusively for the purposes for which it was provided, as well as business related to the Company, except when publication or other type of use is authorized in writing or by legal mandate.
 - Classify confidential information provided or prepared by themselves:
 - In accordance with the **GGB-019 Global Information Classification Policy**, as it constitutes a valuable, special and unique asset of the Company
 - If shared with Third Parties, it must include the legend “For internal and confidential use of Grupo Bimbo.”, either at any end of this or as a watermark.
- Any external request for confidential information from the Company must be handled by authorized persons and reported immediately to the corresponding manager.
 - In order to comply with this policy, all information generated by Grupo Bimbo, through documents and/or emails, will be classified as “INTERNAL”.
- In the event that an associate needs to share Confidential Information with Third Parties, he/she must change the “Confidentiality” of the document to “Public” or “Custom Permissions”, and provide the justification for the change, in accordance with the following:
 - Before sending an email or screen sharing in Teams
 - In case of a document (Word, PowerPoint, Excel, etc.), before saving and sharing it, including via screen in Teams.
- For all confidential information, associates must:
 - Upload Grupo Bimbo's confidential information to authorized repositories (e.g. SharePoint, OneDrive and/or any other authorized by Grupo Bimbo).
 - Use the Teams platform for communication purposes. Any other application (e.g. WhatsApp, Telegram, among others) is not authorized.
 - Avoid sharing confidential information through personal accounts.
 - Share information only with Third Parties that have a current contract with Grupo Bimbo.
- Likewise, upon termination of an employment relationship with any associate, he or she must return all materials and documents belonging to Grupo Bimbo before leaving.

Third parties

- All Third Parties must sign confidentiality agreements, by which they are obliged to maintain the confidentiality of the information provided to them. The corresponding Functional Directorate or the managers of the production centers, distribution centers, as the case may be, are responsible for collecting these agreements provided by the Global Legal Department.

- Due to the confidentiality of the processes, when visits to workplace facilities are required, the following must be done:
 - Comply with the current visitors regulation.
 - Take care of the confidentiality of the information to which visitors have access regarding raw materials and production processes must be maintained. Therefore, only the basic facilities and equipment may be shown to them, without explaining in detail the processes of a specific area.
- Visitors are prohibited from bringing in cameras, video cameras, recorders, pens or other devices that can be used to print images or record information, unless they have express authorization from a manager.

Breach

Any breach of this policy by associates or third parties will be subject to immediate and justified termination of the employment or contractual relationship, as well as to the corresponding civil and criminal procedures for compensation for damages caused to Grupo Bimbo, in accordance with PGB-LR-05 Global Model of Sanctions for Associates.

6. Responsibility / Ownership

The Global Legal and Compliance Department is the assigned owner of this policy and is primarily responsible for its content, updating and monitoring of compliance, as well as for submitting it for approval to the Global Internal Control and Risk Management Department, Steering Committee and General Management.

7. Updates

Changes made between versions are described.

Review / review history				
Version	Review date	Updated by:	Approved by:	Changes main
1				First publication
2	February 2025	Alfredo Gastelum Borboa Corporate Legal Manager.	Luis Miguel Briola Clement Global Legal Director	The definition of Confidential Information has been modified. Non-compliance section and guidelines for information classification have been added.