



## **1. Purpose**

Establish the guidelines to handle and report conflicts of interest.

## **2. Scope**

This policy applies to all permanent associates from administrative to director level, (hereinafter, referred to as the associate or associates) of Grupo Bimbo, S.A.B de C.V and all its subsidiaries and affiliates ("Grupo Bimbo" or the "Company").

For permanent and temporary operators, their manager must determine whether derived from their functions, this policy applies to them.

## **3. Definitions**

**Associate:** Any person who has an employment relationship with Grupo Bimbo through a fixed-term or open-ended contract, regardless of whether they are unionized or administrative personnel.

**Candidate:** Any person who participates in a selection process to become a Grupo Bimbo employee.

**Conflict of interest:** There is a direct conflict of interest when the Associate's interests are or may be inconsistent, interfere, compete with, or be influenced against, either directly or indirectly, with the company's interests due to any situation (e.g. financial interests, any involvement in any company, blood kinship, political or otherwise different type of relationship such as engagement, godparenthood, etc.)

**Indirect interest:** when a goods or services supplier is a relative, at any level or of any type, or has a personal relationship either legally or otherwise (e.g. boyfriend/girlfriend, fiancés, spouses, godparents, etc.) with a Grupo Bimbo associate who makes any decision regarding, or has any influence over, the commercial relation.

**Public official:** Any employee of a government entity who is part of the Executive, Legislative or Judicial Branch, autonomous constitutional bodies, companies with State or government participation; elected or appointed; working at any government level (federal, national, state, provincial or municipal); or any political party, officer of any political party or candidate for any position by popular vote.

## **4. Responsibilities**

**Associates:** Report on a yearly basis and, whenever there is or may be, a conflict of interest; through the applicable IT system. In case the associate does not have access to the IT system, they must report the conflict to their direct superior in writing. Report, prior to any change of position, any possible conflict of interest to the new direct manager.

**Audit Committee:** Authorize, reject and/or propose relevant measures to the Steering Committee pertaining to potential conflicts involving the CEO and/or those received from the Ethics Committee.

**Ethics and Compliance Committee ("Ethics Committee"):** Monitor compliance with this policy and issue recommendations to resolve any conflict that may be consulted, as well as inform the Audit Committee about any situation that needs to be of their knowledge.

**Global Internal Audit Department:** Analyze, at least annually, the records of conflict of interest declarations to identify potential risks and report to the Audit Committee those that should be known.



**Global Legal and Compliance Vice President (“Compliance VP”):** Monitor compliance with this policy. Approve or reject conflicts of interest of candidates and associates, which have to do with relations with the government. Follow up and execute the determinations of the Ethics Committee.

**Global Internal Control & Risk Management Department:** Monitor that every year all the associates sign the declaration of conflict of interest. Generate and share the results of the compliance with the Global Legal and Regulatory Compliance Department and with the Global Human Relations Department.

**Human Relations and local teams:** Follow up on the conflict of interest declaration during the established annual periods. In the case of candidates, collect and share the declaration of conflicts of interest with the potential direct manager prior to hiring. When the declaration of conflicts of interest of candidates involves a public servant, share the declaration with the Global Legal and Compliance Department. Support in those cases that require a disciplinary action due to the non-compliance of this policy.

**Safety and Protection Department:** Conduct the required investigations associated with violations of this Policy that involve, or may involve, the commission of a crime, as well as inform the corresponding authorities in the cases that warrant it.

**Grupo Bimbo Officers and Directors:** Ensure that their associates know, foster, and apply this Policy; oversee its compliance; and authorize, reject, and/or start the relevant and prompt measures to prevent all the conflicts declared by candidates or associates from affecting the company's interests.

## **5. General guidelines**

### **Additional work**

Associates may perform additional (paid or not) work in addition to those performed at Grupo Bimbo, if such additional work:

- Does not interfere with the company's or the associates' main activities or cause a conflict of interest.
- Is reported and authorized expressly by the direct supervisor/approver.
- Must never represent competition or transfer of technology, brands, or otherwise different know-how developed at, by, or for the company in favor of a third party.
- Is not dangerous to the associates' mental or physical health or result in a negative impact upon the work such associate performs for the company or its reputation.
- Is not performed during the associate's working hours with the company.

### **Family, interpersonal relationships, and relationships with retired or former associates**

Whenever there is a family or interpersonal relationship, legal or not (boyfriend/girlfriend, fiancé, spouse, godparents, etc.) among and between people that work at or for Grupo Bimbo, its customers and/or suppliers, the associate(s) in question must comply the following guidelines:

- The associate or associates must disclose the situation in the applicable IT system (or in writing to their direct supervisor if such an IT system is inaccessible).
- Relatives of senior associates may not work at the same working center or operating department, or the Business Unit led by their relative.
- Associates declaring family or interpersonal relationship may not work in the same area or department unless the approver determines that there is no conflict, subject to prior approval of the functional VP or Organization President (according to the authorization table established in this Policy).



- Any commercial relationship of any nature with any of the company's retired or former associates must be expressly and promptly reported by the associate from the company department that is establishing such a relationship.

### **Interests in other companies**

- All associates must declare any direct or indirect property or involvement such associates may have in any type of company different from Grupo Bimbo and that it is included in the section "3. Definitions" in the applicable IT systems.
- Our associates may not be owners, partners, or directly or indirectly involved in any company that is a customer, supplier, or competitor, except for the minority-held businesses, in which case this should also be stated.
- Our associates may not start commercial relations, on behalf of Grupo Bimbo, with companies where they have any direct or indirect interest.
- In cases where the relative of a Grupo Bimbo's senior, executive, or administrative officer has any concession (i.e. cold bread shop), they must disclose the situation through the indicated IT systems. The associate may not directly or indirectly influence a grant of special treatment to any third party.

### **Government relationship**

- All associates must disclose, in the technological systems designated for this purpose, if they have held any position as a public official during the last 5 years, as well as if any member of their family is or was a public server in the same period.

### **Company's resources**

All associates, regardless of their level, are precluded from using the equipment, materials, or resources owned by the company for any type of activity that is not related to the activity carried out within Grupo Bimbo or use such resources in a way that violates the law or may damage the company's reputation.

### **Authorization**

<b>Discloser</b>	<b>Approver</b>
Chief Executive Officer and Steering Committee	Audit Committee (*)
Vice President	Direct Manager
Director and Manager	First Vice President, in the hierarchy
Supervisor, Administrative and Operational	First Director or Manager, in the hierarchy

(\*) This authorization scheme is subject to the basic chart of each Organization.

(\*\*) This process will be executed by the CAE (Chief Audit Executive).

The approvers in the previous chart, must authorize or reject the conflict of interest, declared by the associate, within no more than ten (10) business days.

### **6. Responsibility / Ownership**

The Global Legal and Compliance Department is the assigned owner of this policy and is primarily responsible for its contents, updating, monitoring of its compliance, and submission for approval before the Steering Committee and CEO.

### **7. Updates**



## Global Conflict of Interest Policy

Global Legal and Compliance Department

GGB-014

The changes implemented between versions are described below:

Revision / History of the revision				
Version	Revision Date	Updated by:	Approved By:	Main Changes
1				
2	March 2020	Ignacio Stepancic	Gabriela López Juárez	<ul style="list-style-type: none"><li>• Policy scope was defined, identifying specifically whom to apply it.</li><li>• The authorization chart was added.</li></ul>
3	December 2021	Ignacio Stepancic	Gabriela López Juárez	<ul style="list-style-type: none"><li>• The type of conflict "Government relationship", the definition of a public official, and the limit of days to approve or reject a conflict of interest were added.</li></ul>
4	June 2022	Mavín Dominguez	Ignacio Stepancic	Modified the policy scope and added that the declaration for permanent and temporary associates will be at the discretion of their managers. Updated the responsibility of the Internal Control Department.
5	August 2023	Mavín Dominguez	Ignacio Stepancic	<ul style="list-style-type: none"><li>• Responsibilities are added:</li><li>• Associate: to make the declaration of conflict due to change of position or area.</li><li>• Compliance Director: Approve or reject conflicts of interest of candidates and associates to the government.</li><li>• Global Department and local HR areas: In the case of candidates, collect and share with the direct supervisor the declaration of conflicts of interest to hiring. When the declaration of conflicts of interest of candidates involves a public servant, share the declaration with the GLCD.</li></ul>
6	April 2025	Mavín Dominguez (Compliance Manager)	Ignacio Stepancic (Compliance Director)	Internal Audit responsibilities are updated.