

1. **Purpose**

To establish general guidelines and parameters to ensure that the Company and its representatives not only understand and comply with the applicable, local and global, anti-corruption laws in the way of doing business and in the relationships, that can arise from it, but also be guided by a correct way of behaving with their social and commercial environment.

2. **Scope**

This policy is applicable to its shareholders and all persons, regardless of their position or level, who work for the Company, including without limitation, Counselors, Directors, Managers and, in general, any eventual or permanent associate (hereinafter jointly identified as “associate” or “associates”), as well as third parties. It is applicable to any deal, contract or negotiation in all countries where the Company has operations.

3. **General guidelines**

Responsibilities

- **Associates:** Be familiar with this policy and comply with it at all times.
- **Ethics and Regulatory Compliance Committee (“Ethics Committee”):** Establish measures for the implementation of this policy. Approve, on a case-by-case basis, those situations that, under the policy, require express authorization. Apply or oversee the application of the corresponding disciplinary measures for non-compliance with the policy.
- **Global Regulatory Compliance VP (“Vicepresident of Compliance”):** Monitor compliance with the policy. Follow up on and execute the decisions of the Ethics Committee. Disseminate this policy and any amendments to all Grupo Bimbo employees, including new hires.
- **Global Controllership Department:** Implement the necessary accounting controls to identify, within the accounting accounts, the details of transactions carried out with third parties and expense reimbursements.
- **Global Department and local People areas:** Support training on the policy and applicable anti-corruption laws.
- **Business Unit Presidents and Functional VPs / leaders::** Implement this policy.

Basic principles

Grupo Bimbo S.A.B. de C.V., its subsidiaries and affiliated companies (“GB” or the “Company”) consider the value of integrity as an essential element in the way of doing business. At Grupo Bimbo, we act with integrity every day, always looking after the Company's interest. We value the goodwill of others: our behavior builds trust. The Company is committed to do business in an ethical and honest way, free of any form of corruption or bribery and in promoting the correct actions of all associates. Likewise, it is of utmost importance for Grupo Bimbo to maintain accounting books and records with reasonable detail, which accurately reflect the nature and business purpose of the transactions. Therefore, it is Grupo Bimbo's policy to comply with the following guidelines:

- Grupo Bimbo:
 - o Strictly forbids any form of corruption and bribery in the way of doing business, both in the private and public sectors.
 - o Encourages and is part of a community where the environment of mutual respect, trust and affection, firmly rooted in the moral integrity of its associates, is a fundamental pillar for personal relationships and where its leaders are guides and examples of others.
 - o Has zero tolerance when it comes to lack of integrity, acts of corruption and bribery and is firmly committed to doing business in an honest and ethical way.
 - o Is committed to carrying out all its activities in an integral, ethical and legal manner, especially complying with the laws related to integrity and anti-corruption in each of the countries where it operates in.

- o Prohibits making payments or providing services, including payments related to extortion or kidnapping, to individuals or entities involved in serious illicit activities that pose legal, regulatory, or reputational risks.
- o Prohibits entering into, maintaining, or facilitating commercial, contractual, or business relationships with sanctioned third parties, companies, or individuals directly or indirectly related to such activities.
- o Takes its legal responsibilities very seriously and expects its associates to do the same. The Board of Directors, the Chief Executive Officer and the Top Management fully support this policy and expect its full compliance.
- Associates must comply with and adopt all policies and procedures related to their work at Grupo Bimbo.
- All associates must comply with Grupo Bimbo standards and report, through the reporting channels, any non-compliance.
- Actions such as falsifying information, plagiarism, committing fraud, theft, consuming or distributing illegal substances, improper use of company assets, or violating laws will be considered integrity violations and will be sanctioned by the Company.

The compliance with the guidelines and requirements established in this policy will be under the supervision of the General Management of the Company, through the Ethics and Compliance Committee.

4. Prohibition of payments or support to sanctioned third parties

- Grupo Bimbo prohibits directly or indirectly providing money, goods, services, information, or any other type of support to sanctioned third parties or those subject to restrictions, in accordance with applicable sanctions lists.
- This prohibition applies in all countries where the Group operates and includes any form of financial, logistical, operational, or professional support.
- Any request for payment, benefit, or support involving sanctioned third parties must be reported immediately to Regulatory Compliance through the established channels.

5. Gifts, meals, trips and entertainment

Illicit benefits for public officials or private individuals. When it comes to corruption, the Company does not differentiate between public officials and private individuals: Bribery and corruption are not tolerated regardless of the quality or position of those involved.

Associates must not offer bribes, directly or indirectly, to public officials, private individuals, family members, or third parties related to them, in order to obtain undue advantages for the Company or third parties.

Reception of illicit benefits. Associates must not request, accept, or attempt to obtain, directly or indirectly, anything of value from public officials or private individuals in exchange for an undue advantage. There is no acceptable amount when it comes to bribery.

Conflict of Interest: Associates must report any situation that constitutes, or could constitute, a conflict of interest for Grupo Bimbo, in accordance with **GGB-014 Global Conflict of Interest Policy**.

6. Bribery and corruption– prohibited activities

Associates must **never**:

- Offer, request, receive, or accept gifts, meals, travel, or entertainment to or from public officials, private individuals, their family members, or related third parties, with the intent to influence or induce actions that grant undue benefits or advantages to the Company or its associates.

The Company has established rules for the prior approval or reporting of expenses related to gifts, meals, travel, and entertainment. Any action that results in exceeding the pre-established limits requires prior and written approval from the Global Legal and Regulatory Compliance Department. The present policy does not replace nor substitute the **GGB-013 Global Travel Expenses Policy**.

6.1. Private individuals

Apart from complying with the general principles indicated in section 6. Associates must follow these guidelines:

- **Gifts.** An associate can, so long as it is common practice or market practice and it is permitted by local law:
 - Offer or give a gift to a private individual, whose value must not exceed USD \$100. The annual aggregate value of gifts which can be given by an associate to any private individual as a whole must not exceed USD \$300.
 - Accept an occasional from a private individual. The annual accumulated amount which can be received by an associate must not exceed USD \$100.
- **Meals.** An associate can pay for a private individual's meals so long as:
 - The associate is present during the meal;
 - The cost of the meal does not exceed USD \$100 per person. The annual accumulated amount of meals that an associate can pay for any private individuals, as a whole, must not exceed USD \$500;
 - The place where the meal takes place is not inappropriate;
 - The purpose of the meal is to promote, show or demonstrate the Company's products and services, and
 - The invitation is not extended to any Family member or other person invited by the private individual.

(Note: in exceptional cases, such as spontaneous invitations that might arise during an unscheduled meeting, the people accompanying the guest can be invited if otherwise offensive).

An associate can occasionally accept invitations to meals from a private individual. The person who extended the invitation must be present during the meal and it must not exceed USD \$100 per person. The annual accumulated amount of meals which an Associate can receive from all private individuals, as a whole, must not exceed USD \$500.

- **Trips.** Under no circumstances may an associate pay for vacations or tours of any kind for private individuals, including family members and friends; an associate may only invite a private individual on a trip, including airfare, lodging, and local transportation, provided that:
 - There is a justified business purpose, such as demonstrating products or services, training and conferences, or facility inspections or Company's operations.
 - The expenses comply with the austerity principle and do not become exorbitant (e.g., a first-class ticket is arguably unjustified).
 - The trip does not include friends nor Family members of the guest.
 - The trip does not imply any deviations or taking the opportunity to visit unplanned spots (these deviations are unnecessary if they extend the original trip to other locations or generate unjustified expenses).
 - The invitation to the trip does not include handing over cash as travel expenses per day.
 - Any travel expenses amount for a private individual requires a previous written authorization.

For an associate to be able to accept any invitation to a trip of any kind made by a public official or a private individual, they must obtain authorization from the Regulatory Compliance Department.

- **Entertainment.** An associate can give tickets to entertainment events to a private individual if:
 - The associate is present during the event;
 - The value of the ticket does not exceed USD \$50(*) per person. The annual accumulated amount of tickets for entertainment that an associate can give to any private individuals, as a whole, must not exceed USD \$200(*);
 - The place is not inappropriate, and
 - The purpose of the event is or is connected with the promotion, demonstration or explanation of any of the Company's products or services.

(*) This applies to any country where GB has operations, except in the US, where the amounts to be considered will be USD \$ 100, with a maximum of USD \$200 accumulated annually.

An associate may accept tickets to entertainment events from a private individual. The person extending to the associate the invitation must be present and the cost must not exceed USD \$50(*) per person. The annual accumulated amount of entertainment events, which the Associate can receive, must not exceed USD \$200. Any entertainment event, which an associate is invited to, must be reported to the Compliance Department.

6.2. End-of-year gifts, meals, trips and entertainment

During the end of year period, from November 1st to December 31st, associates must **never**:

- Offer, request, receive, or accept gifts, meals, travel, or entertainment to or from public officials, private individuals, or their family members or related third parties.

6.3. Payments in cash

Cash payments made by Grupo Bimbo areas must be included in the corresponding accounting records and must not exceed USD \$100. Likewise, documentary evidence must be available to support how the corresponding cash disbursement was made (e.g., receipts or invoices).

The foregoing is without prejudice to compliance with other applicable tax and accounting obligations, including obtaining the corresponding authorizations, depending on the amount to be paid. For further details, refer to **FGB-CR-07 Global Policy for Cash and Securities Accounting.**

6.4. Donations and Sponsorship

The Company promotes various projects to give back to the community a portion of what it receives from it. For this reason, the Company allocates resources to support recognized non-governmental organizations focused on environmental care, education, and physical activity. However, because donations have been used to conceal acts of bribery and corruption, the Company will not use donations as a means to cover up acts of corruption or bribery. The following are the guidelines that govern these donations.

6.4.1. General Donations Regulations and principles

Associates may provide support, on behalf of the Company, in cash or in kind, to qualified non-governmental organizations or those that promote social welfare and the quality of life of the communities where we operate.

Care must be taken with donations made to organizations that may be related to public officials or third parties; anti-corruption authorities may consider such donations as an improper benefit in favor of the public official or related third parties.

Associates must never offer donations to influence members of an entity or organization, in favor of the Company, in order to obtain or secure an improper or undue advantage.

Any donation made by associates, on behalf of the Company, must comply with local legislation and be approved in writing by the Social Investment Committee and by the Ethics Committee if it involves a government entity, public official, customer, or supplier. In addition, such donations must be recorded on the platform of the Global Legal and Regulatory Compliance Department.

6.4.2. Good neighbor

For this Grupo Bimbo initiative:

- The Ethics Committee will pre-approve the projects when the legal and internal requirements of the company are met.
- The area responsible for the initiative must send the complete list of projects to the Global Legal and Compliance Department.
- The Global Legal and Regulatory Compliance Department will review each project and validate its compliance with this policy.

6.4.3. Personal donations

This policy does not apply to associates' personal donations. In fact, associates are encouraged to participate in this type of donation in a personal capacity. To do so, they must not use the Company's name, image, resources, facilities, working time, or any other asset, nor take advantage of their position within the Company to request or pressure others to do so.

6.4.4. Sponsorships

To position the brand through advertising activities, the Company may provide sponsorships for cultural or sports events organized by government or private entities. Prior to entering into sponsorship agreements with government entities, they must be authorized by the Global Legal and Regulatory Compliance Department.

6.4.5. Political contributions

All direct or indirect contributions by the Company to political parties or candidates for elected office are prohibited.

6.5. Government relationships

The Company acknowledges that associates, when performing their duties, will eventually be in touch with public officials at any level: federal, local, district or state.

The Company seeks to establish friendly and harmonious relationships with public officials. However, it is imperative that those relationships comply with the applicable law and, especially, with their Policies.

6.5.1. "Day-to-day" relationships

Associates are prohibited from engaging in any bribery or corruption of public officials, including offering anything of value to obtain licenses, official documents, favorable arrangements in litigation, or to avoid

sanctions or complaints. Likewise, associates are prohibited from giving anything of value to an authority when it is presumed that it will personally benefit a public official or serve an illicit purpose.

The prohibition does not apply to payments made directly to authorities in the normal and lawful course of business for a legitimate purpose (e.g., payment of fees for a permit or license), provided that such payments are supported by an official receipt and the corresponding documentation of the transaction.

In order to ensure that the relationships with the public officials are appropriate, the Compliance VP, the Ethics Committee and the Corporate Affairs Department will designate some authorized associates to act as the main point of contact to represent the Company before public officials.

6.5.2. Gratifications

Any gratification (payment or gift with anything of value to facilitate, secure the result or expedite a procedure or process before any authority) is prohibited.

Any request of this kind or payments made by a public official or on their behalf must be reported immediately to the Compliance VP and Ethics Committee.

6.5.3. Communication with public officials

It is the Company's commitment that all communications be honest, ethical, and conducted through official channels, including clear, complete, accurate, precise, timely, and understandable information in reports and documents submitted to securities authorities, as well as in any public communication. Any document addressed to an authority must be thoroughly reviewed to ensure that all information contained therein is accurate and complete.

6.5.4. Influence peddling

Grupo Bimbo prohibits the use of influence, financial or political power, real or fictitious, upon any public official in order to obtain a benefit or advantage for the Company to cause harm to any person, regardless of the result.

6.5.5. Tenders and contracts with government

The Company must comply with public procurement laws and regulations, including those governing public tenders and contracts related to government entities.

Associates must not offer (or attempt to offer or promise to carry out such actions), directly or indirectly, money or items of value to public officials, their family members, or third parties in order to influence the award of public contracts or tenders.

Associates must not obtain, nor try to obtain from any source:

- Sensitive information of the government procurement.
- Confidential information from the government (e.g. the list of pre-selected contenders for a contract or public tender, etc.).
- Information owned by a competitor, including bid-related information during a government procurement process or in any other situation where it may be presumed that such information should not be disclosed without authorization.

It is prohibited to circumvent requirements or provide false information in public procurement processes. Documents that a government entity may request for a public procurement process or for the award of a contract through a means other than a public tender may include a declaration of relationships with the

entity or with the public officials involved in the contract. Any information requested in connection with such declaration must be complete and truthful.

The Company requires honesty and transparency in tenders and proposals. In addition, associates must not manipulate tenders so that a competitor or third party is awarded them. Associates must not compromise their integrity in conversations with other companies or public officials.

The Company seeks to win tenders or other government contracts in a fair and honest manner, based on the quality and value of our products, never through unethical or illegal practices.

It is prohibited to participate in public procurement processes when, by operation of law or by resolution of a competent authority, the Company is restricted or disqualified from doing so.

Non-compliance may result in observations by oversight bodies and may involve the Company in administrative or criminal sanctions.

6.5.6. Conspiracy in public procurement

Any agreement, contract, arrangement, understanding, or combination among competitors to obtain an undue benefit for Grupo Bimbo or to harm public entities shall be considered collusion.

Grupo Bimbo prohibits associates from carrying out actions with other participants in public procurement processes that seek to obtain an undue benefit.

This prohibition also applies to commercial transactions.

The exchange of information with other participants to coordinate bids or prices in public procurement processes may be considered collusion, as it harms the government entity.

6.5.7. Recruitment of public officers

The hiring of former public officials is only permitted after one year has elapsed since their separation from public service, or in accordance with applicable local regulations, regardless of whether or not they possess privileged information acquired as a result of their employment, position, or commission that could directly allow the Company to benefit in the market or gain an advantageous position over its competitors.

No special treatment shall be given to former public officials, their family members, or third parties in hiring processes, including permanent, temporary, or internship positions.

The Company must not engage in discussions regarding potential employment with public officials involved in any government tender or procurement process in which the Company is participating.

Any job offer to former public officials or their family members requires prior approval from the Compliance Director, the Ethics Committee, or the Legal and Regulatory Compliance Department. If approved, background checks must be conducted and due diligence carried out, which must be documented before making a job offer.



If an associate identifies that a candidate is a family member of a public official, they must inform the Compliance Director, the Ethics Committee, or the Legal and Regulatory Compliance Department before an offer is made to such candidate.

6.5.8. Obstruction of the powers of investigation

When information is available in connection with an investigation of administrative offenses involving a case of corruption or related to sanctioned third parties, it is prohibited to obstruct the investigative powers of the authorities, provide false information, deliberately and unjustifiably delay the delivery of such information, or fail to respond to their requests or resolutions.

6.5.9. Lobbying

The Company may participate in its own initiatives or those proposed by its trade association to improve current laws or bills applicable to the Company, always in a legal and transparent manner.

Only authorized associates and third parties may carry out lobbying activities, in compliance with the laws and customs of each country.

Before participating in any of these activities, authorized associates must seek guidance from the Compliance Director, the Ethics Committee, and the Corporate Affairs Department.

6.5.10. Misuse of public resources

When, under any circumstances, Grupo Bimbo handles, receives, manages, or has access to public resources, it is prohibited from misusing or diverting public resources, whether material, human, or financial, and is required to account to the authorities for their use in order to verify the destination given to said resources.

6.6. Code of conduct for suppliers

To ensure that suppliers acting on behalf of Grupo Bimbo conduct themselves in accordance with this policy, the Company has issued a third-party code of conduct, which is mandatory for any person or entity wishing to do business with Grupo Bimbo to subscribe to and comply with.

6.7. Training and certifications

All associates and TPIs (third-party intermediaries) must know, understand and comply with the policy, as well as attend the training sessions related to it, which are mandatory.

6.8. Integrity Background Checks (“IBCs”)

TPIs and third parties may represent a risk from an anti-corruption perspective or due to links with sanctioned third parties; therefore, the DGJCN, or whomever it designates, must conduct IBCs prior to entering into or renewing a commercial relationship with a TPI or third party, as established in: ***PGB-CP-08 Procedure for Integrity Background Checks.***



7. Report of complaints and violations

Any possible violation of the policy or any rule must be reported immediately to the Compliance Vicepresident, the Ethics Committee, and the Legal and Regulatory Compliance Department.

Reports can be made via the *Speak Up* line of the corresponding location, which is an anonymous and confidential means of communication, or sent to comenta@grupobimbo.com or compliance@grupobimbo.com. These reports will be shared exclusively with individuals authorized by the Company.

Failure to report known conduct or conduct that is suspected may result in sanctions, including termination of employment.

If there are doubts as to whether a conduct constitutes an act of corruption or bribery, the Compliance Vicepresident, the Ethics Committee, or the Legal and Regulatory Compliance Department should be consulted.

7.1. Prohibition of retaliation

Retaliation against any person who reports misconduct or participates in its investigation is prohibited. Failure to comply with this provision may result in disciplinary action against the offender, including termination of the employment relationship.

7.2. Investigation into possible policy violations

Any potential violation of this policy will be investigated in a timely and confidential manner. If misconduct is confirmed, the Company will take the necessary corrective actions in accordance with applicable law, which may range from administrative records and warnings to termination of the employment relationship and reporting to the competent authorities.

Before the determination of the corresponding action, people who engaged in those conducts will have the right to state whatever may be in their best interest.

8. Non-compliance

The Ethics Committee shall determine the disciplinary measures for non-compliance with this policy, which must be enforced by management.

These measures may include a warning, temporary suspension, or termination of employment without liability, as well as reporting to the competent authorities.

The disciplinary measures imposed by the Ethics Committee, in accordance with the foregoing, shall not affect any other criminal, administrative, or civil proceedings that may apply.

9. Audits and monitoring

Internal or external audits will be conducted at Grupo Bimbo to verify compliance with this policy, especially in public procurement and administrative procedures in which Grupo Bimbo participates for the obtaining or renewal of permits or authorizations, to ensure compliance with the applicable legal framework.



Associates will be required to provide the information requested by auditors; if such information is protected by confidentiality, it must be submitted to the Ethics Committee, which will determine how it should be provided to the auditors.

10. Risk-Based Assessments

The DGJCN, or whomever it designates, will carry out risk assessments on corruption, to formulate new strategies and strengthen the present policy, based on the **PGB-CP-07 Procedure for Compliance Risk Analysis**.

11. Mergers and Acquisitions

Prior to any transaction related to an acquisition (of an entity or significant portion of its assets), merger or joint venture, the GLCD, or its designee, will conduct anti-corruption and anti-bribery due diligence.

12. Definitions

Associate: Any person with a labor relationship with Grupo Bimbo through a fixed-term or indefinite contract, regardless of whether they are unionized or administrative personnel.

Bribe: Give, offer, promise, request or receive (or any attempt to carry out said actions) any Object of Value, directly or indirectly, to influence someone's conduct to obtain or retain a business opportunity, motivate a person to refrain from an act related to their duties, or abuse their influence.

Contribution in kind: Support other than cash, for example, free product or at a reduced price.

Donation: Anything given as a contribution of money, equivalents, or in-kind contributions. A grant generally refers to support for a specific purpose (e.g., research, education, etc.). A donation normally refers to support for charitable purposes or basic human needs (e.g., disaster relief for a population).

Entertainment: Artistic, sporting or cultural events, such as competitions, theatre performances or concerts.

Family members: Group of people united, or not, by blood ties up to the fourth degree, or people who have interpersonal relationships that are or are not of a legal nature (e.g. couples, dating, concubines, "compadrazgos", etc.) with public officials or private individuals.

Gifts: Any Object of Value or benefit given to a person as a symbol of esteem or friendship without expecting to receive something in return.

Gratifications: Payments or anything else of value, made to public officers to ensure, accelerate or in any other way facilitate the outcome of a government process.

Institutional gift: Any item that has an advertising nature and carries the logo of a Company (e.g. basket filled with Grupo Bimbo products), which value does not exceed USD \$50 and complies with all applicable laws.

Lobbying: Process through which the Company makes its opinion public in any project or government action, with the purpose of convincing public officers to act the way the Company deems appropriate for its business, through the means that the legislation allows in each country the Company operates in.

Object of value: Includes any benefit such as cash, in-kind contributions, cash equivalents (gift cards), loans, gifts, prizes, meals, travel, entertainment, political contributions, donations, offers or promises of

employment, concessions in contracts or services, and the option to purchase shares of a company related to the Company.

Political contribution: Monetary and non-monetary contributions (for example, resources, facilities or other assets of the Company) to support political parties, officials of political parties, politicians or candidates for elected positions.

Private individual: Any person other than a public officer, especially suppliers and customers.

Public official: Any employee or official of government bodies, state-owned enterprises, investigative agencies, political parties, or candidates for public office, at any level of government.

Sanctioned third parties: Any individual or legal entity, organization, or entity included in sanctions lists, designations, or restrictions issued by competent national or foreign authorities, as well as those designated for their participation in money laundering, terrorist financing, or organized crime.

Third parties: Persons who have professional, labor, or business relationships with public officials, private parties, or associates, or who are partners in companies where these individuals or their family members are involved.

Third Party Intermediary (“TPI”): Companies or individuals acting as intermediaries or on behalf of Grupo Bimbo before any institution or government official.

Trips: Includes plane tickets, transportation and accommodation.

13. Updates

The changes implemented among versions are described below:

Revisions / History of revision				
Version	Revision Date	Updated by	Approved by	Main Changes
1	Dec, 2016	Global Compliance Director	Grupo Bimbo Steering Committee	
2	April, 2018	Global Compliance Director	Grupo Bimbo Steering Committee	The following sections were added: <ul style="list-style-type: none"> • General aspects • End-of-year gifts, meals, trips and entertainment • Payments in cash • Influence peddling • Conspiracy in public procurement • Obstruction of the powers of investigation • Misuse of public resources • Non-compliance • Audits
3	Jan, 2021	Global Compliance Director	Grupo Bimbo Steering Committee	<ul style="list-style-type: none"> • Expansion of the concept of family members. • Linking of family members of public officials. • Inclusion of the Good Neighbor program

4	Oct, 2023	Global Compliance Director	Grupo Bimbo Steering Committee	<ul style="list-style-type: none"> The definition of Third Party Intermediary is added. Expansion of general guidelines. Inclusion of reference to the global conflict of interest policy. Inclusion of reference to the Global Policy on Accounting for Cash and Marketable Securities. Extension of the concept of donations. Addition of the Sponsorships section. Expansion of the concept of trainings. The following sections were added: Integrity Background Analysis, Risk-Based Assessments, Mergers and Acquisitions.
5	Apr, 2026	Manager of Compliance	Compliance Vicepresident	<ul style="list-style-type: none"> Inclusion of the definition of sanctioned third parties