



1. Purpose

Establish the guidelines to handle and report possible 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, god parenthood, prior employment relation, friendship, 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, god parenthood, prior employment relation, friendship, 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 the existence or absence of possible conflicts of interest annually, and at the moment a potential or actual conflict of interest exists or may exist, through the IT platform established for such purposes, regardless of whether they represent a risk to the company or not, in order to ensure transparency, avoid discretionary interpretations, and allow for an objective assessment. If the associate does not have access to the system, the report must be submitted in writing to their immediate manager. Report any possible conflict of interest to the new immediate manager prior to any job change.

Audit Committee: Authorize, reject, or propose measures to the Board of Directors regarding potential conflicts of interest involving the Chief Executive Officer and those reported by 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 possible 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”): Communicate and promote compliance with this policy. Review reports of potential conflicts of interest related to candidates and associates involving ties with authorities or governmental officials and, when applicable, approve or reject them. Follow up on 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 possible conflict of interest. Generate and share the results of the compliance with the Global Legal and Regulatory Compliance Department and with the Global People Department.

Global People Department and People local teams: Follow up on the possible conflict of interest declaration during the established annual periods. In the case of candidates, collect and share the declaration of possible conflicts of interest with the potential immediate manager prior to hiring. When the declaration of possible 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. Document the process for reviewing and resolving conflicts and retain evidence of the determinations, including root cause analysis and corrective actions.

Security 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 Presidents, Vice Presidents and Directors: Ensure that associates understand and comply with this policy; oversee its enforcement and take timely measures to prevent potential conflicts of interest from affecting the company.

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.

Bilateral relationships

When a potential conflict of interest involves more than one associate or a counterparty connected to Grupo Bimbo, each party must submit their individual declaration. If any of them fails to do so, the Global People Department or the local People areas must record the situation, follow up on the resolution, and report the analysis performed and the measures adopted to the Global Legal and Compliance Department for traceability purposes.

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

Discloser	Approver
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 must authorize or reject the potential conflict of interest declared by the associate within a maximum of 10 business days. The Global People Department and the local People areas will oversee compliance with this deadline. Failure to resolve within the established timeframe will be considered non-compliance and may result in corrective measures.

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

The changes implemented between versions are described below:

Revision / History of the revision				
Version	Revision Date	Updated by:	Approved By:	Main Changes
1	December, 2016	Compliance Manager	Global Compliance Director	First publication
2	March 2020	Compliance Manager	Global Compliance Director	<ul style="list-style-type: none">• Policy scope was defined, identifying specifically whom to apply it.• The authorization chart was added.
3	December 2021	Compliance Manager	Global Compliance Director	<ul style="list-style-type: none">• 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.
4	June 2022	Compliance Manager	Global Compliance Director	<ul style="list-style-type: none">• 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.



Global Conflict of Interest Policy

Global Legal and Compliance Department

GGB-014

5	August 2023	Compliance Manager	Global Compliance Director	<ul style="list-style-type: none">• Responsibilities are added:• Associate: to make the declaration of conflict due to change of position or area.• Compliance Director: Approve or reject conflicts of interest of candidates and associates to the government.• 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.
6	April 2025	Regulatory Compliance Manager	Global Regulatory Compliance Manager	Internal Audit responsibilities were updated.
7	January 2026	Regulatory Compliance Manager	Global Regulatory Compliance Manager	<ul style="list-style-type: none">• The obligation to declare all potential conflicts of interest was specified.• A definition and process for handling bilateral declarations is incorporated.