

Grupo Bimbo S.A.B. de C.V. and its subsidiaries ("Grupo Bimbo") are a group that has thrived since its foundation in 1945, seeking business relationships with suppliers based on mutual trust, respect, fairness, honesty, integrity and continuous improvement, committed to ethical and sustainable principles.

To "build a sustainable, highly productive and deeply humane company" we need to involve and commit all suppliers. Grupo Bimbo considers as suppliers ("Suppliers"), all of our partners who provide us with ingredients, packaging, finished products, indirect materials and services, as well as our contract manufacturers who we entrust to produce our products on our behalf and our suppliers' suppliers.

We expect Suppliers to fully comply with this Code of Conduct, all applicable laws, legal requirements, best practices and international standards where they operate, to improve sustainable practices and ensure long term value to our consumers and product excellence.

If concerns arise, we collaborate with the Supplier to identify potential improvements. However, when an issue is not corrected or a Supplier is unwilling to engage, we reserve the right to end our relationship, regardless of contractual obligations. Where alignment with the Supplier Code of Conduct could lead to a conflict with or a violation of applicable laws or regulations, the supplier will notify Grupo Bimbo of the situation and explain how it intends to operate in a responsible manner.

To ensure a clear understanding of the principles and policies that govern the relationship and ensure their implementation, we have developed this Grupo Bimbo Supplier Code of Conduct.

Sustainable Sourcing

Grupo Bimbo has also published certain global policies that apply to specific topics, such as Global Sustainability Management, Environment, Social Impact, among others. Grupo Bimbo reserves the right to request additional third-party certifications of ingredients, commodities, materials, or services as they become available and are commercially viable.

The scope of this Code of Conduct establishes Grupo Bimbo's guidelines and policies for social, economic and environmental practices.

1. Social & Ethics

Ethical Behavior - A Shared Commitment

To remain sustainable and achieve consumer preference, Suppliers and their employees shall establish and always maintain the highest ethical standards including:

- **Business Integrity.** Suppliers shall adopt and implement a "zero" tolerance policy prohibiting any kind of bribery¹, corruption, extortion and fraud. All transactions must be conducted transparently and properly recorded.

¹ For the purposes of this Code of Conduct it means giving, offering, requesting or receiving (or any attempt to give, offer, request or receive) anything of value for the purpose of directing the behavior of someone to obtain or retain a benefit.

- **Conflicts of Interest.** Suppliers may engage in trade relations with other companies, including Grupo Bimbo's competitors. However, any situation that results in, or could potentially result in, a conflict of interest must be avoided and reported immediately to Grupo Bimbo. To maintain transparency and integrity in the relationship, suppliers are required to conduct an annual self-assessment and submit to the Grupo Bimbo representative a formal declaration confirming the absence of any conflicts of interest. Grupo Bimbo reserves the right to request proof of such self-assessments and may conduct audits to ensure compliance with this requirement.

Additionally, to maintain the commercial relationship with Grupo Bimbo, suppliers must declare annually at comenta@grupobimbo.com if (s)he (in case of being a self-employed person), its legal representative, or any member of its steering/executive committee performs or held any position in the Government by the last 5 years. A position in the Government should be understood as an elected or appointed employee of a governing body belonging to any level (federal, national, state, provincial or municipal), or of any political party; as well as any person who has been a candidate for any elected position.

- **Confidentiality.** Suppliers shall not reveal any confidential information provided by Grupo Bimbo relating to their business relationship to: (a) their representatives, except when it relates specifically to providing goods and services to Grupo Bimbo or on its behalf; or (b) to persons outside the supplier's organization. Suppliers must comply with applicable security and privacy laws, regulations and retention requirements, and ensure that they have appropriate legal, technical and security controls in place to protect Grupo Bimbo's confidential information. Confidential information means all non-public Grupo Bimbo data, including but not limited to: business plans, pricing strategies, marketing plans, personal information, trade secrets and intellectual property. Suppliers may not outsource, disclose, share, or use this information outside the requirements defined in the agreement executed with Grupo Bimbo. Suppliers should never use Grupo Bimbo's confidential information for their own benefit or that of other persons. Similarly, Grupo Bimbo shall not request confidential information about its competitors from Suppliers.

No Bribery and Corruption

Suppliers shall operate legally and in compliance with all applicable laws and regulations as well as international agreements, including anti-corruption laws.

Given that anti-corruption laws typically prohibit direct or indirect payments, the manipulation of government officials² and third parties; any improper payment, gift or other valuables offered or provided by a supplier can be considered as provided by Grupo Bimbo. Consequently, we prohibit any such behavior by any of our current or prospective Suppliers. Given that bribery and corruption are considered punitive crimes, Grupo Bimbo takes its legal responsibility seriously in this regard and expects the same from its Suppliers.

² For the purposes of this Code of Conduct it includes any officer or employee of a body of government, whether elected or appointed, acting in that capacity, representing all levels of government, federal or national, state or provincial, or municipal; but not limited to their legislative bodies, ministries or departments, judicial bodies, state-owned entities or investigative agencies, as well as any political party, an official of a political party or candidate for any elected office.

Prohibited Acts

Offering or Receiving Improper Benefits: With regards to corruption, Grupo Bimbo does not distinguish between government officials and individuals. Bribery and corruption are not tolerated regardless of those involved. Suppliers that do business with or act on behalf of Grupo Bimbo, should not give, offer, promise, request, accept or receive directly or through third parties, anything of value to or from any Government Official, private entity, individual, or a family member thereof, with the intent to persuade them or be persuaded to exploit their position for any undue advantage.

Gifts, Food, Travel, and Entertainment

Suppliers must not offer, give, request or receive any gifts, meals, travel or entertainment, from or to, any person on behalf of Grupo Bimbo or any of Grupo Bimbo's associates.

Grupo Bimbo has in place a gift, meals, travel and entertainment policy, which all Suppliers must abide to, that is based upon lean principles and relationships with our Suppliers, prohibiting them: (i) giving us or receiving from us travel and/or entertainment (except as expressly and strictly authorized on a case by case basis by Grupo Bimbo's Ethics and Compliance Committee), (ii) giving us or receiving from us gifts (other than promotional gifts with no commercial value) and (iii) giving us or receiving from us meals (other than business related meals, in customary places, sticking to sobriety, austerity, coherence and rationality principles). Suppliers are required to regularly review Grupo Bimbo's website or consult their Grupo Bimbo representative to stay informed of the latest version of this policy.

Under this Code of Conduct, no adverse action is to be taken against any Grupo Bimbo and/or supplier's associate who reports via Speak-Up line, complains about, or participates in the investigation of a possible violation of a company's code of conduct, applicable law, or company policy unless the complaint or report is deliberately false.

Fraud and Other Criminal Behaviors

Suppliers shall not violate any criminal statute or perform any illegal acts, including fraud and theft, while maintaining a business relationship with, or acting on behalf of, Grupo Bimbo.

Labor Standards

Suppliers shall respect the human rights of all workers and treat them with respect and dignity, including fixed, temporary, migrant, student, or contract workers.

- **Non-Discrimination, Anti-Harassment, and Humane Treatment.** Suppliers must not discriminate against any person based on race, color, religion, gender, age, nationality, disability, sexual orientation, gender identity, pregnancy, marital status, political affiliation, union membership, or any other personal characteristic protected by law. This code of conduct applies to all aspects of employment, including recruitment, promotion, demotion, transfer, layoff, termination, compensation, education, training, and working conditions. Additionally, Suppliers shall ensure that all workers are treated humanely, free from any form of abuse, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse, as well as any threats of such treatment. Local regulations will be prioritized for any controversy.
- **Freely Chosen Employment.** Suppliers shall ensure that all employment is voluntary, prohibiting the use of forced, bonded, or indentured labor, involuntary prison labor, slavery, or trafficked persons. Workers must retain control of their identity documents and be free to leave their employment at any time. All terms of employment must be transparent, provided in the worker's native language, and fully compliant with applicable laws and regulations, including those related

to foreign and immigrant workers. Suppliers must not withhold wages or documents outside any legally understood contractual agreements.

- **No Child Labor.** Grupo Bimbo strictly prohibits the use of child labor. Suppliers must comply with the minimum age for employment as defined by local laws and regulations in the countries where they operate. In no case shall suppliers employ persons under the age of 15, unless local law allows employment at age 14, as per ILO (International Labour Organization) Convention 138. In jurisdictions where the minimum employment age is set higher (e.g., 16 in China), suppliers must adhere to the local legal requirements. Workers under the age of 18 shall not perform hazardous work. Suppliers are required to implement age verification procedures and take remediation measures if child labor is detected. Legitimate workplace apprenticeships and vocational programs for younger individuals, in accordance with applicable laws, are permitted.
- **Freedom of Association.** Suppliers shall respect the rights of workers to organize collectively and to do so independently, without interference, in accordance with the legal frameworks of the communities where Grupo Bimbo operates. In communities where free and independent collective bargaining is restricted by law, Grupo Bimbo will support suppliers in recognizing alternative means for workers to express their interests and concerns.
- **Compensation, Working Hours, and Benefits.** Suppliers shall ensure that all compensation, including wages, benefits, and overtime pay, complies with applicable labor laws. Workweeks, including overtime, must not exceed the maximum number of hours permitted by law. Overtime shall always be voluntary, and must be agreed upon through a legitimate collective bargaining agreement or written consent, with all workers informed at the time of hiring. Overtime shall be compensated at the mandated or agreed-upon premium rate. Workers shall have at least one day of rest in every seven-day period.

2. Economic and Safety

Food Quality and Safety

Grupo Bimbo is committed to providing its customers and society with reliable and safe products. Therefore, Grupo Bimbo expects Suppliers to always consider and manage food safety and quality in their own operations and in the supply chain. Suppliers must deliver products and services that meet the safety and quality requirements established by Grupo Bimbo, in addition to those established by applicable laws and regulations where they operate and Grupo Bimbo reserves the right to request additional quality and food safety certifications from the supplier at any time. Suppliers must provide Grupo Bimbo with any critical information involving any products or services provided by the supplier that can affect the quality or safety of Grupo Bimbo's products.

Traceability

Grupo Bimbo reserves the right to request full traceability of all ingredients and materials from Suppliers in order to ascertain their origin and determine sustainability risks and applicability of existing and emerging regulations and standards.

Health and Safety

Suppliers shall ensure safe and healthy working conditions, using appropriate controls, safety procedures, preventive maintenance and safety equipment. All these practices must comply with applicable laws.

The health and well-being of associates as well as consumers is a priority of everyone who works at Grupo Bimbo. All Suppliers' workers shall be provided with regular and recorded health and safety training, as required by law in a language that is understood by the corresponding workers.

Suppliers shall adopt emergency action plans covering fire, spills and other evacuation concerns for all sites supplying products or services to Grupo Bimbo, which include emergency management teams, communication plans with updated contact lists and at least one annual drill. Suppliers should also ensure the provision of fire safety standards, required training for first aid and emergency care and the handling and disposal of hazardous materials.

All supplier workplaces shall be properly ventilated for hot environments and where chemicals and solvents are used. Workplaces shall also be sufficiently heated for cold environments, taking into consideration any risks related to food safety. Adequate lighting and noise protection will be afforded in the workplace. Suppliers shall maintain scheduled and recorded equipment maintenance to ensure proper industrial hygiene.

Adequate Record Keeping and Accounting

Suppliers shall retain and maintain accounts and records with a reasonable level of detail and that adequately reflect the business conducted with Grupo Bimbo. Suppliers shall also retain and maintain accounting control systems to ensure that their records and anti-corruption objectives are achieved.

3. Environment

Grupo Bimbo recognizes that sustainability is a key part of its function as a company. Negative (or potentially negative) effects on the environment shall be reduced or eliminated as much as possible in its operations, while safeguarding the safety and health of the workforce and taking into consideration product safety. It is the obligation of Suppliers to know and comply with all applicable environmental laws, regulations and international agreements and develop plans and best practices to promote environmental sustainability. Grupo Bimbo encourages the implementation of creative ideas for waste management and reduction, recycling and re-uses programs.

Suppliers shall responsibly manage all aspects of its business to meet or exceed recognized environmental standards and legal requirements and strive for continual improvement.

Suppliers shall properly manage energy use, transportation, greenhouse gases, emissions to air, ozone depleting substances, water use, wastewater and effluents, waste, hazardous and potentially hazardous substances, contaminated land and groundwater, land use and biodiversity, and community nuisances as determined through a site-by-site risk approach. Suppliers shall have an Environmental Management Plan ("EMP") that covers all sites providing products or services to Grupo Bimbo. This EMP should include environmental risk assessments, objectives and targets, operational controls, controlled documentation, scheduled audits and inspections, and annual management reviews. Workers shall be encouraged to propose improvements to Suppliers' sustainability performance.

Intellectual Property and Reputation

Our brand names are a key asset of our business. Maintaining the reputation of our brands is essential to our ability to attract and retain retailers, consumers and associates; and it is critical to our future success. Suppliers must avoid any act or behavior that could result (or reasonably be expected to result) in affecting the reputation of our brands or any other of our intellectual property rights.

Supplier must assure that the services or products provided to Grupo Bimbo according with its business relationship are not infringing any third party's intellectual property rights.

Implementation, Administration and Enforcement

Just as we expect our associates to uphold and commit to the principles set forth in this Code, we similarly expect that Suppliers will do the same. We encourage Suppliers to acknowledge, respect and adopt the Grupo Bimbo Supplier Code of Conduct or similar and equal standards as follows:

- **Communication.** All Suppliers will be requested to review the Grupo Bimbo Supplier Code of Conduct and to return a written acknowledgement. The requirements of the Code must be communicated to all Suppliers' employees.
- **Self-assessment Questionnaire as it is requested.** Grupo Bimbo reserves the right to request a risk assessment or a self-assessment. Grupo Bimbo shall prioritize the implementation of the Grupo Bimbo Supplier Code of Conduct to critical Suppliers, with corresponding actions and resources.
- **Contractual Terms and Conditions.** Any contract with Grupo Bimbo shall be in writing and make reference to this Supplier Code of Conduct. In addition, contracts and declarations shall include adequate safeguards against corruption.
- **Subcontractors.** Suppliers shall not outsource others to act on behalf of Grupo Bimbo, without prior written permission. The written authorization is independent of the supplier's obligation to suitably conduct quality due diligence and ongoing verification of the subcontractor to ensure that it complies with this Supplier Code of Conduct. Suppliers shall submit to Grupo Bimbo, upon request, the result of this due diligence and / or verification, including all reports or documents generated during that process. Suppliers shall obtain written acknowledgement from the subcontractor, of compliance with this Code.
- **Audit Requirements.** Grupo Bimbo may conduct audits at the offices or sites of the supplier or request it from a third party, to verify compliance to this Code of Conduct and any other applicable laws. These audits may be conducted with or without prior notice, except in cases where local laws or security protocols require advance notification. In such cases, the Supplier must cooperate to schedule the audit within a reasonable timeframe. Suppliers shall make the best efforts to fulfill all audit requests. The costs of the audits might initially be covered by Grupo Bimbo. However, if audit findings show any breach of this Code of Conduct or any applicable law, then subsequent audit costs, including to review and implement corrective actions, will be borne by the supplier. Grupo Bimbo reserves the right to take additional actions as necessary, including termination of any contract or business relationship with the supplier.
- **Training and Compliance.** Grupo Bimbo encourages Suppliers to implement or maintain a compliance program and appropriate training to detect and prevent any violation of the obligations set forth in this Code of Conduct.
- **Reporting Violations and complaints.** Any violation of this Code of Conduct should be reported to Grupo Bimbo's Ethics and Compliance Committee or to Grupo Bimbo's Legal Department in a timely fashion. Suppliers shall communicate anonymous and confidential mechanisms for their employees to report any violations directly to Grupo Bimbo. These complaints must be made via online reporting, which is confidential, to comenta@grupobimbo.com

Precedence in Case of Conflicting Provisions

In the event of any conflict between the provisions of this Code of Conduct and any other contractual documentation between Grupo Bimbo and the Supplier, the following rules of precedence shall apply:

- For matters concerning ethics, human rights, labor practices, anti-corruption, and compliance with local and international laws, the provisions of the local laws and regulations shall take precedence.
- For business terms such as pricing, payment, delivery, and other commercial obligations, the provisions of the relevant contract shall take precedence, provided that such terms do not contravene any ethical or legal standards established in this Code of Conduct.

4. Updates

The changes implemented in between versions are described below:

Revision / History of the revision				
Version	Revision Date	Updated by	Approved by	Main Changes
1	January, 2017	Global Procurement Supervisor	Global Procurement Director	First publication
2	March, 2025	Global Procurement Director	Global Procurement VP	Conflict of interest, Labor standards, Audit requirements and Precedence in case of conflict of provisions sections were updated.

	Grupo Bimbo Supplier Code of Conduct Global Procurement Department	FGB-EPR-03
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Acknowledgement of Grupo Bimbo Supplier Code of Conduct

I am an authorized legal representative of [name of the supplier] (including its subsidiaries, parent corporation (s), affiliates and related entities) and hereby acknowledge and fully agree to abide by the policies and principles of “Grupo Bimbo Supplier Code of Conduct” and ensure that the employees, officers, directors, agents, representatives of are aware of and abide by such policies and principles in the process of preparing and submitting bids and proposals for Grupo Bimbo, for provision of goods and services to Grupo Bimbo, and during the performance of all agreements entered into with Grupo Bimbo for such purposes.

Authorized Signatory Name (printed):

Signature:

Title:

GB Vendor ID:

Date: