1. Purpose

Establish the requirements for Fraud Risk Management at Grupo Bimbo.

2. Scope

This policy applies, regardless of their position or level, to Board members, VPs, Directors, and any temporary or permanent associate, as well as to consultants, contractors, suppliers, or third parties related to Grupo Bimbo. This policy complements the ***GGB-004 Global Integrity Policy*** and the general guidelines of the ***GGB-001 Grupo Bimbo Code of Ethics*****.**

3. Requirements

Grupo Bimbo has a zero-tolerance approach to fraud, as fraudulent acts are contrary to its values and beliefs and have a negative impact on its operations, reputation, and Associates. Therefore, to support compliance with the Fraud Risk Management Program, the following requirements must be observed:

3.1. Risk analysis and assessment

To ensure an effective fraud risk assessment and evaluation process, the Functional Global Departments must:

- Form a multidisciplinary team to conduct a fraud risk assessment to identify those frauds of
- highest risk and determine the actions to manage them.
- Report the results of the assessment to the Global Audit Department.
- Define key risk indicators.

3.2. Prevention and detection

- The Global Functional VPs must define process-level controls and authorization limits to
- prevent and detect fraud.
- Internal Audit must carry out reviews and data analysis to detect possible acts of fraud.
- The immediate managers must ensure that personnel in their charge are trained in general fraud prevention, in the processes and areas for which they are responsible.

3.3. Investigation and determination of corrective actions

In case of suspicions or acts of fraud:

- The Global Internal Audit and Security and Safety Departments shall carry out the corresponding investigations based on the ***GGB-004 Global Integrity Policy*** and the ***GGB-001 Grupo Bimbo Code of Ethics*** and ensure the confidentiality of the information and the anonymity of the reporters, whenever local legislation allows it.
- The Fraud Resolution Committees will determine possible corrective actions according to the damage and consequences of the fraud committed, in accordance with the internal policies of Grupo Bimbo and the local policies of the country or region. Also, they will evaluate the elements to initiate legal actions in each case.

3.4. Obligations of associates

Under the Fraud Risk Management Program described above, every associate must:

- Annually confirm the knowledge of the Fraud Risk Management guidelines by reading this policy.
- Communicate to area leaders, promptly, control weaknesses and possible fraud risks that they identify in the processes in their area of responsibility and implement the necessary changes.

- Use and propose internal controls for the detection and prevention of fraud in the processes in their area of responsibility.
- Use the company's tangible and intangible assets only for the purpose of the business. It is strictly forbidden to make other uses of them to obtain or try to obtain personal benefits or for the benefit of a third party.
- Make use of Grupo Bimbo's information based on the provisions established by the ***GGB-015 Global Safety Policy***, the ***GGB-004 Global Integrity Policy***, the ***FGB-CP-01 Global Personal Data Protection Policy***.
- Use their authority and functions solely for the benefit of the company, always based on the principles set out in the ***GGB-001 Grupo Bimbo Code of Ethics***. It is strictly forbidden for associates to use their authority and function to obtain or attempt to obtain a benefit for themselves or a third party.
- Treat associates and third parties with respect, fairness, trust, and affection, so it is strictly forbidden to influence or coerce any associate or third party to obtain or try to obtain a benefit for themselves or a third party.
- Declare any conflict of interest-based on the ***GGB-014 Global Conflict of Interest Policy***.
- Report, through the Speak-Up Line, to the Security and Protection Department, Global Legal and Regulatory Compliance Department or Internal Audit and/or immediate manager (the immediate manager should report it to any of the aforementioned departments), any suspicion, indication or fraud.

Therefore, the manipulation and improper management of any type of internal and third-party information, regarding financial or operational information, or the concealment of information, with the aim of obtaining or attempting to obtain personal benefits or benefits for a third party, to evade responsibilities or distort the profitability, efficiency or effectiveness of the company or department, is strictly prohibited.

Sanctions

- Any associate, shareholder, supplier, contractor, or third party who violates this policy will be subject to sanctions by Grupo Bimbo.
- Acts or suspicions of fraud will be investigated, and appropriate legal and administrative measures will be applied in accordance with the internal policies and local legislation of the country or region.

4. Definitions

The following definitions are internal; each organization should evaluate the differences with the legal definitions of each country when taking legal action against persons involved or suspected of acts of fraud.

Asset Misappropriation: Theft or embezzlement of tangible or intangible company resources through the use of deception, breach of trust, and omission or distortion of information (e.g. cash, inventories, machinery, vehicles, tools, trade secrets, databases, files, and any other element owned by GB), to obtain illicit personal benefits or for a third party. The appropriation of assets using intimidation, violence or force is not part of this definition.

Coercion: Use of intimidation that obligates a person, against his or her will, to cooperate with determined actions.

Collusion: Fraudulent acts or acquisitions carried out in mutual agreement by associates or third parties, inside or outside the Business Unit.

Concealment: Deliberate omission, concealment, and/or falsification of company information to commit fraud or manipulate internal and external decision-making.

Corruption: Inappropriate use of power to obtain an undue benefit, as well as any violation defined in ***GGB-004 Global Integrity Policy***.

Manipulation of financial and operational information: Intentional and improper modification of information, figures, disclosures, and statistics of financial statements (Balance Sheet, Income Statement, Cash Flows, and changes in Stockholders' Equity) and other internal financial or operational reports.

Fraud: Acts that a person or organization commits, by deceiving, breaching confidence, or omitting or distorting information, to obtain an illicit personal or business benefit, such as manipulation of financial and operational information, misappropriation of assets, and corruption.

Fraud investigation: A methodological inquiry process performed when there are reports of suspicion or acts of fraud. The Global Departments of Internal Audit and Security and Protection are the only departments authorized to carry out these investigations, either with their own members or by hiring third parties.

Fraud Resolution Committees: Composed within each Business Unit and consisting of representatives from Internal Audit, Safety and Security, Internal Control, Legal and Compliance and People.

Fraud risk: The Business Unit's vulnerability concerning becoming a victim of acts of fraud.

Global Fraud Risk Management Committee: Comprised of the Global Departments of Internal Control, Legal and Compliance, Safety and Security, Internal Audit, Controllership and People.

Key Risk Indicator (KRI): A measure that serves to monitor risk exposure or the progress of mitigation strategies.

Public corruption: All those acts, within the definition of corruption, in which at least one of the actors involved is a public servant. A public servant should be understood as an employee, elected or appointed of a government 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 popularly elected position.

Speak-up Line Committee: Group of members from different Grupo Bimbo departments, such as People, Operations, Sales, Communication, Administration and Finance, and Marketing, among others. The departments involved depending on the Business Unit structure.

Third parties: Suppliers, customers, distributors, and any person who does not have a direct working relationship with Grupo Bimbo.

5. Updates

The changes implemented in-between versions are described.

Revision / History of the revision				
Version	**Revision date**	**Updated by**	**Approved by**	**Main changes**
1	November 2020	Global Internal Audit Department	Global Internal Control Department	First Publication

2	July 2021	Global Internal Audit Department	Global Internal Control Department	• The Global Controllership Department was added to the Fraud Committee • The Fraud Resolution Committees were replaced by the Speak-Up Line Committees. • The responsibilities of the Global Controllership Department were included. • The immediate manager's responsibility was added.
3	July 2022	Global Internal Audit Department	Global Internal Control Department	• Change of name from "Administration" to "Management". • Inclusion of operational information within the category of information manipulation. • Clarification that the definitions are internal. • Expanding the definition of corruption by adding the elements of public corruption. • The Global Ethics and Compliance Committee's responsibility for fraud investigations are regulated.