

## 1. Purpose

Establish general guidelines to maintain the confidentiality of the information belonging to Grupo Bimbo S.A.B. de C.V. and its subsidiaries and affiliates ("Grupo Bimbo or the company") or that of its clients, suppliers or any third party that may have provided information, ensuring that the use of this information is only for Grupo Bimbo's interest.

## 2. Scope

It covers all of Grupo Bimbo's associates, as well as all third parties that have any relationship with Grupo Bimbo.

## 3. Definitions

**Confidential information:** All the information, documentation, inventions, ideas, concepts, models, manufacturing models, prototypes, designs and/manufacturing plans, methods of use, process designs, operation conditions, equipment designs, technical information, "know-how", industrial secrets, economic processes, market reports, studies, plans, programs, drawings, pictures, videos, researches, analysis, compilations, pricing information, terms and conditions regarding teams, sales, licenses and engineering services, everything related to finance, business and market plans, legal subjects, supplier lists, clients and potential client lists, business prospects, business opportunities, business records, personal assignments, contracts, assets of Grupo Bimbo and/or of its affiliates and subsidiaries.

**Third parties:** Persons or entities that establish any relationship with Grupo Bimbo, for example: Suppliers, agencies, business partners or consultants.

## 4. Responsibilities

**Associate:** Every associate that has access to confidential information must keep strict confidentiality regarding such information.

**Security Department:** Responsible for identifying and correcting areas of opportunity in the security protocols of the work centers, as well as investigating and, in any given case, notifying possible violations to confidential information.

**IT Department:** Responsible for identifying and correcting areas of opportunity in the security protocols in information technologies, as well as to provide the necessary technological tools in order for the functional areas to comply with the policy.

**Global Legal and Compliance Department:** Provide legal general advice to the Committee members and associates that require it with regards to confidential information subjects.

**Functional Areas:** In charge of establishing controls, procedures and training to comply with the policy and implement it within its operation.

## 5. General guidelines

### **Associates**

All of Grupo Bimbo's associates must maintain the confidentiality of all confidential information entrusted to them by the company, its clients, suppliers and third parties, and use this information only for business related to the company, except when the disclosure or other type of use has been authorized in writing or

through a legal mean. Confidential information entrusted to associates establishes a valuable, special and unique asset belonging to the company.

This includes information published for associates in order to keep them informed or connected to their work activities. Confidential information also includes information that has been collected, acquired or developed during the contract term of the company's associates, including information that has its origin in associates acting on their own or together with other company or third-party personnel, such as industrial secrets, and in which the terms established in the **GGB-006 Global Policy for the Protection of Trade Secrets** should be observed.

Any external requirement of the company's confidential information must be managed by the authorized persons and it must be reported immediately to the corresponding manager.

Any non-compliance with this policy by any Grupo Bimbo associate or any third party, will be subject to immediate and justified termination of the work or contractual relationship, respectively, as well as subject to the corresponding civil and criminal procedures for damages caused to Grupo Bimbo.

Likewise, upon the termination of a work relationship with any associate, the latter must return ALL materials and documents belonging to Grupo Bimbo before they leave.

### **Third parties**

All third parties must sign confidentiality agreements; by which they agree to keep confidential all information provided to them. The corresponding director or plant manager, distribution or work centers, as the case may be, are responsible for collecting these agreements provided by Legal.

Due to the confidentiality of our processes, when visits are required to any of Grupo Bimbo facilities (plants, distribution centers, etc.) the rules on visits to plants must always be observed.

In each and every one of the visits described previously, care must be taken regarding confidentiality on the information provided or to which visitors have access regarding raw material and production processes. Therefore, only basic facilities and equipment may be shown, with no explanation as to the details of the processes in any specific area.

It is strictly forbidden for any visitor to Grupo Bimbo's facilities to bring photo or video cameras, recorders, pens or any device that may serve to print images or register information, unless they have express authorization from a vice-president.

## **6. Responsibility / Ownership**

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 in between versions are described below:

Revision / History of revision				
Version	Revision Date	Updated by:	Approved By:	Main Changes
1				