

1. Purpose

Establish the guidelines to maintain the protection of Grupo Bimbo's trade secrets, allowing adequate exploitation of them as the company's competitive advantage.

2. Scope

This policy applies to all Grupo Bimbo associates, its affiliates and subsidiaries, in their different regions and functions, as well as relations with third parties, about the trade secrets in place and futures ones.

3. Definitions

Black Box: A mixture of ingredients, with a specific function in a formula, configured to maintain the secrecy of the information and prevent it from being easy to reproduce by reverse engineering. Examples of a black box are: a pre-blend mixture of ingredients, the separation of access to different components of the information, and physical barriers preventing access to the information.

Third Parties: People or entities outside of Grupo Bimbo, for example suppliers, agencies, business partners, or consultants.

Trade secret: It is all information or object, including, without limitation, formulas, algorithms, molds, patterns, compilations, programs, devices, technologies, methods, techniques, and processes that have or could have an independent economic value; the use and confidentiality of which generate a competitive advantage over competitors, who cannot have access to this information unless by breaking the law or contractual obligations. A trade secret must be a different way of doing things or solving problems; it must not be known in the academic environment, industry, or media; it must be difficult to apply or deduce by an expert technician on the subject, and it must not be easily reproduced by inverse engineering.

Trade Secrets Committee ("the Committee"): Formed by the heads of the following Global Departments and areas of Security, Research & Development, IT, Legal, Technology Development, and Procurement.

4. Responsibilities

Associates who have knowledge about possible trade secrets: Report their existence and keep the trade secrets strictly confidential.

Committee: Define the findings or inventions that must be treated as trade secrets, as well as the best way of protecting them according to their nature.

Research & Development, Technology Development, and Operations Departments: Supervise compliance with this policy. Keep an inventory of the trade secrets that exist within their area and in their local counterparts. Carry out investments, establishing and implementing the necessary procedures for this policy. Support the Business Units on the safeguarding and protection of their local trade secrets.

Global Procurement Department: Supervise the compliance with the policy and ensure the use of trade secrets as a Grupo Bimbo property during negotiations and bidding processes with suppliers.

Security Departments: Identify and correct opportunity areas in the security protocols of the work centers. Investigate and, if necessary, report any violation of a trade secret.

Global IT Department: Identify and correct opportunity areas in the security protocols of the information technologies, as well as offering the necessary technological tools so that the Functional Departments can comply with the policy.

Global Legal Department: Develop and present materials and training for the legal protection of trade secrets. Provide legal advice to the members of the Committee and associates who require it.

Functional Departments and areas where a trade secret is applied or exists: Comply with this policy regarding trade secrets that exist within their operation.

Global Internal Audit and Legal Departments: Supervise the compliance with this policy, as well as suggest corrective measures in case opportunity areas are detected.

Business Unit Presidents: Ensure that all formulas and trade secrets existing in their country or operation are safeguarded in black boxes and with the highest standards of security and secrecy, to prevent them from being shared, totally or partially, with unauthorized people.

5. General guidelines

The trade secrets will be considered and protected as such if they maintain their secrecy. The details and specifications of the trade secret must have physical support, exclusively dedicated to its safeguarding, and be guarded in the place that the Committee has designed for this.

The areas where the trade secret is reproduced in part or totally must be covered or isolated, guaranteeing restricted access preventing it from being on view to non-authorized people. The digital materials where part or the totality of the trade secret is kept must have high levels of security and encryption.

The access to trade secrets must be solely limited to the associates who strictly require it due to their functions, only to the necessary part in case the nature of the trade secret allows its division, and so long as they sign a confidentiality agreement. It should be ensured avoiding only one person having access to the totality of a trade secret. It is forbidden to publish in part or the totality of trade secrets in the internal media such as Altamira or GB-on.

It is strictly forbidden to share in part or the totality of trade secrets with third parties. In such case, because of a business opportunity, it may be necessary to share a trade secret with a third party; this requires prior written approval by the Committee, as well as the signing of a non-disclosure agreement by the third party.

Any failure to comply with this policy on the part of Grupo Bimbo associates or any third party could result in the immediate and justified termination of the employment or labor relationship, respectively, as well as the corresponding civil and procedures for the compensation of damages to Grupo Bimbo.

For more information on the execution of this policy, see the **PGB-RD-01 Global Procedure for the Trade Secret Protection**, located on GB-on.

6. Responsibility / Ownership

The Global Research & Development 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 the revision				
Version	Revision Date	Updated by:	Approved by:	Main Changes
1				
2	Jul, 2016	Legal Department	Global Internal Control and Risk Management Department and Research & Development Department	<ul style="list-style-type: none"> The responsibilities and members of the Committee were added
3	June 2021	Global Research & Development Department	Global Internal Control and Risk Management Department	<ul style="list-style-type: none"> The responsibility of the Global Research & Development Department was updated. The responsibilities of the General Business Units President were added. The definition of black boxes was added.