

## 1. Purpose

Establish the general guidelines for the classification and management of information, owned by Grupo Bimbo

## 2. Scope

Applies to all associates, third parties, personnel with temporary assignments and any other person that maintains relationship with Grupo Bimbo, S.A.B. de C.V., and / or any of its affiliates (hereinafter, "Grupo Bimbo or the Company") that make use of the Company's information.

## 3. Definitions

**Confidential information:** All 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, trade 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 and assets of Grupo Bimbo and/or of its affiliates and subsidiaries.

**Custodian:** Associate or third-party guardian of the databases and repositories where company information is stored.

**Internal information:** Accounting information, communication between associates and third parties, process results, emails, among others, which can be accessible to all Grupo Bimbo departments and associates.

**Public information:** Advertising campaigns, brochures, vacancies, social networks, web pages, among others, which are accessible to the general public.

**Restricted information:** Documents that contain commercial, **sensitive personal**, financial data, investigations, and records, among others, are accessible only by a specific department of Grupo Bimbo.

**Sensitive personal data:** Data that could affect the holder's most intimate sphere or misuse could start discrimination or come with severe risk. Considered sensitive data are those that could reveal aspects such as racial or ethnic origin, patrimonial or financial data, current and future health status, genetic and biometric information, religious, philosophical, and moral beliefs, union membership, and political opinions, or sexual preference.

**Unclassified information:** Information whose classification is unknown.

## 4. Responsibilities

**IT Managers:** Execute the access controls defined for the IT systems based on the requirements established in this policy.

**Global Legal Department:** Provide legal advice in general, to associates who require it, related to confidential information issues.

**Global Information Security Department:** Establish the information classification regulatory framework and the necessary IT configurations to promote the company's information security.

**Business Unit, Functional and Area Vice Presidents:** Ensure this policy is implemented within their area of responsibility.

## 5. General guidelines

### Classification

In order to promote the proper use of information, Grupo Bimbo will use the following criteria for its classification:

Classification	ID
Confidential	C.4
Restricted	C.3
Internal	C.2
Public	C.1
Unclassified	N/A

- For confidential information all provisions established in the **GGB-005 Global Policy on Confidential Information** and **GGB-006 Global Policy for the Protection of Trade Secrets** must be considered.
- The “Unclassified information” must be considered as confidential until the owner or custodian determines its classification.
- All information classifications mentioned are subject to the requirements established in the **FGB-CP-01 Global Policy for the Protection of Personal Information**.

### Ownership and labeling

- All information is owned by Grupo Bimbo and must comply with the characteristics for its identification in accordance with the provisions of **PGB-IT-SI-05 Procedure for the information classification**.
- The custodians of the information will be responsible for ensuring that all information is labeled with its ID and classification in accordance with the provisions of **PGB-IT-SI-05 Procedure for the information classification**.

### Storage and management

- In accordance with the provisions established in the **FGB-IT-22 Access Management Global Policy**, the IT Managers must implement the access controls for each information classification.
- For the information classified with IDs **C.4**, **C.3** and **C.2**:
  - The Global Legal and Compliance Department, through the People Department, must ensure that associates sign, every two years or in accordance with the provisions of the local legislation of each country, the shorter term, a privacy notice, as well as a non-disclosure agreement at the beginning of the employment relationship with Grupo Bimbo.
  - Every associate, responsible for signing contracts with third parties, must ensure the contractual inclusion of the clause corresponding to the protection of personal data, as well as a non-disclosure agreement.
  - Associates and third parties will be responsible for complying with local laws and internal regulations, regarding retention, as established by Grupo Bimbo's Global Legal and Compliance Department.
- Associates, third parties and information custodians who manage classified information as trade secrets must comply with the provisions established in the **GGB-006 Global Policy for the Protection of Trade Secrets**.
- All information contained in the company's information assets must be managed according to the provisions established in the **GGB-010 Global Policy for the Use of Information Assets**.

## 6. Responsibility / Ownership

The Global IT Departments are the assigned owners of this policy and are 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	February 2021	Alejandro Cuevas Gallegos	Juan Pajón, Raul Obregón y Antonio Parra	
2	July, 2022	Carlos Alonso Ramirez Caballero	Antonio Parra	Sensitive data was added to the description of restricted information.