



# Global Policy on the Grupo Bimbo Regulatory Framework

Global Internal Control and Risk Management  
Department

GGB-002

## 1. Purpose

Establish general guidelines to define, create, update and identify the elements that will integrate Grupo Bimbo's regulatory framework to make it clear, accessible, with standard formats and a clear assignment of responsibilities in terms of their creation, maintenance, update, authorization and publication.

## 2. Scope

This policy applies to all Grupo Bimbo Business Units and areas ("the Group" or "GB") as well as to all of its associates.

## 3. Definitions

**Policy:** It is a statement of general principles, mandatory in nature, that contributes to accomplishing Grupo Bimbo's goals. This policy serves as the foundation for the procedures, but does not include specific detail procedures.

**Global general policy:** It is applicable to all of Grupo Bimbo and outlines its general guidelines. These guidelines should be known by all GB associates as they are applicable to all Business Units, functions and levels in the Group given their high impact or criticality.

**Global functional policy:** These are principles, limited in their scope, to be followed in each functional department (e.g. sales, operations) in all of Grupo Bimbo's Business Units. They are mandatory in nature for all the department's functions and lay the foundation to create all the procedures.

**Business Unit policy:** These are principles, limited by their scope, to be followed by a particular Business Unit, since they specifically regulate exceptional and particular situations of each Business Units as applicable.

**Procedure:** This is a series of steps to put into action what a policy defines in a general way. It details the mechanisms to address routine and non-routine situations, and is documented in the functional department's handbooks.

## 4. Responsibilities

**Chief Executive Officer (CEO):** The CEO is responsible for dictating the global policies, either general or functional, that support the accomplishment of objectives and facilitate the implementation of strategies, as well as appointing an owner for each of them. The CEO is primarily responsible to comply with and enforce what each policy sets.

**Global Internal Control and Risk Management Department:** Assuring that the global general policies are updated as well as ensuring that they are duly communicated to and understood by all the Group's associates, and third parties that are required to know and comply with them.

**Global Functional Departments:** Are responsible for defining, issuing, and communicating at the relevant levels the particular policies and summaries including the procedures that regulate specific matters pertaining to its function, in addition to their periodic maintenance and update.

**Policy owner:** Is primarily responsible for the policy's content assigned by the CEO, and for updating and submitting for approval to the Steering Committee and CEO, through the Global Internal Control and Risk Management Department. Monitor compliance of the guidelines established in this policy.

**Business Unit Vice Presidents:** Responsible for ensuring each policy and procedure is translated into the local language or languages and that all policies are communicated and distributed internally. Vice Presidents are also responsible for ensuring compliance with all regulations.

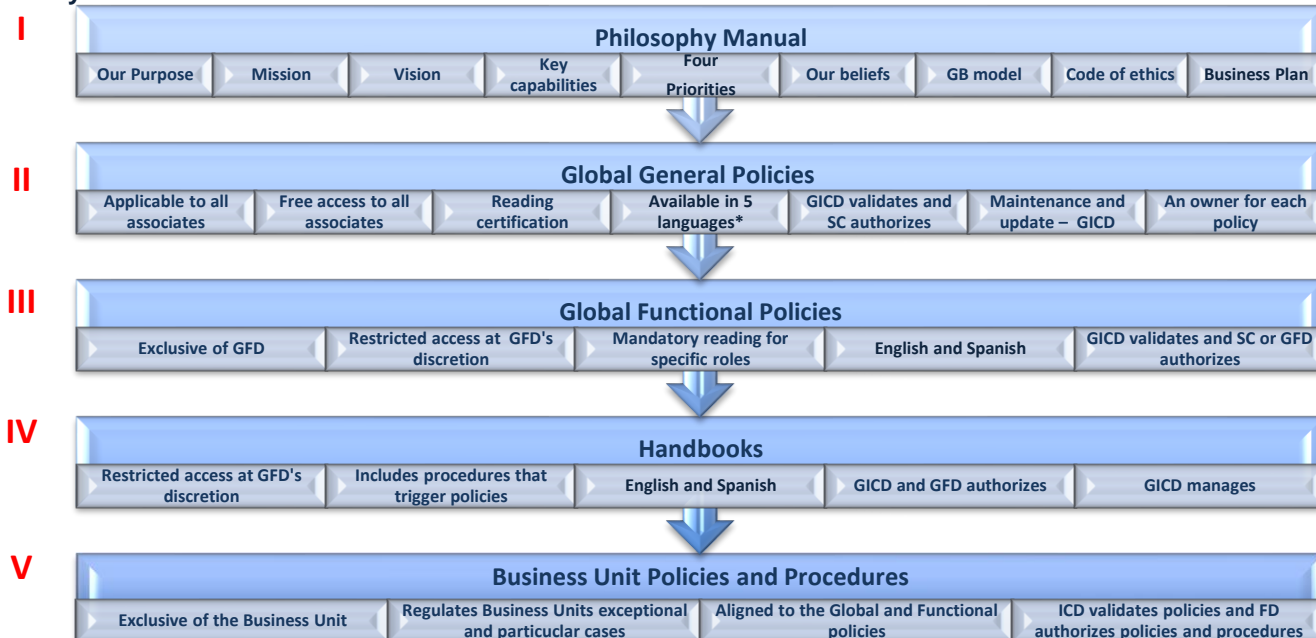
**HR Departments:** To ensure all new associates, at all levels, know and sign the **GGB-001 Grupo Bimbo Code of Ethics** and the Global General Policies, as a part of the Grupo Bimbo onboarding process.

**Associates:** Must read, understand, and apply the relevant policy contents in their daily operations. In some cases, the associate must sign an acknowledgement as a proof of having read and understood them, in the applicable platforms as per the CEO's instructions.

## 5. General guidelines

- The global general policies must be implemented at all applicable levels and should serve as a starting point to create all the remaining documents of the Group.
- Global policies, either general and functional, are a crucial part of the Group's organizational life, therefore, any violation to the policies may be subject to a sanction that could even include the termination of the working relationship.
- The only authorized and applicable regulatory framework in Grupo Bimbo is as follows:

### Hierarchy



SC – Steering Committee  
GICD – Global Internal Control and Risk Management Department  
GFD – Global Functional Department  
ICD – Internal Control Department  
FD - Functional  
\*Spanish, English, French, Chinese and Portuguese.

## 6. Directives

- For any global policy, either general or functional, the single official channel to create, delete, update or submit for CEO and Steering Committee's authorization is the Global Internal Control and Risk Management Department.



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- For global functional policies, the Global Internal Control and Risk Management Department will be responsible for validating its content. However, the only responsible of such content and authorization will be the Global Functional Vice President.
- No Business Units may have its own policies that cover matters that have already been regulated in the officially issued policies.
- In no case can a local or business unit policy reduce the compensation paid to associates as authorized by a global policy, including the travel expenses per diem defined in the **GGB-013 Global Travel Expenses Policy**.
- Grupo Bimbo uses Spanish and English as its official languages when issuing general and functional global policies.

### 7. Requirements

- To ensure their effectiveness, all the policies must have specific related controls and avoid including only ideological, non-mandatory statements.
- The format and sections that must be included in the policies will be dictated by the Global Internal Control and Risk Management Department in order to ensure their consistency and uniformity through time.
- They must be simple in writing and have a clear, succinct and accurate language. There should be no ambiguities in meaning.

### 8. Communication & Access

- The global general policies must be communicated and understood by all Group's associates in such a way that the access to such policies is free and unrestricted.
- The global functional policies must be communicated by the Global Functional Department and understood by all those associates responsible for their application, therefore, their access may be restricted, at its discretion.

### 9. Signature

- All active associates from VP to administrative level must annually sign the Code of Ethics and the new or updated Global General Policies in the applicable authorized platform(s).
- Operations associates have to sign and receive training on the Code of Ethics and on the new or updated Global General Policies, at least every two years.

### 10. Responsibility / Ownership

The Global Internal Control and Risk Management 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.

### 11. Updates

The changes implemented in between versions are described below:

Revision / Revision Log				
Version	Revision Date	Updated by:	Approved by:	Main Changes
1				
2	December 2017	Global Internal Control and Risk	Steering Committee	Grupo Bimbo uses Spanish and English as its official languages



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		Management Department		
<b>3</b>	January 16 <sup>th</sup> , 2018	Global Internal Control and Risk Management Department	Steering Committee	Business Unit Vice Presidents: Responsible for ensuring each policy and procedure is translated into the local language or languages and that all policies are communicated and distributed internally. Vice Presidents are also responsible for ensuring compliance with all regulations.
<b>4</b>	February 28 <sup>th</sup> , 2018	Global Internal Control and Risk Management Department	Steering Committee and Trinidad Carrandi	In no case can a local or business unit policy reduce the compensation paid to associates as authorized by a global policy
<b>5</b>	March 27 <sup>th</sup> , 2019	Global Internal Control and Risk Management Department	Global Internal Control and Risk Management Department	HR departments' responsibilities and signature guidelines were added.
<b>6</b>	May 18 <sup>th</sup> , 2021	Global Internal Control and Risk Management Department	Global Internal Control and Risk Management Department	The four priorities and business plan were added to the regulatory framework.