

1. **Purpose**

To establish the general guidelines for the management and maintenance of the traceability system in each manufacturing facility of Grupo Bimbo.

2. **Scope**

Applies to all responsible associates of production centers and subsidiaries that produce, store, and distribute products with Grupo Bimbo brands, until the sales center.

3. **Definitions**

Crisis committee: Group of GB associates that are responsible for the management of any crisis situation that may put business continuity at risk.

Mass balance: Relationship between the amount of materials that enter the production process and the amount that comes out of it. Its formula is explained in the general guidelines section.

Recall: Procedure developed by the company that consists in pulling out market product when it is suspected or it is certain that it violates the current food laws, or that food safety or quality standards are violated for that market. The Crisis Committee of the Business Unit participates in the decision-making process for recalls. If the recall is due to a safety issue, the Committee communicates it to the stakeholders, including the external certification body.

Tracing: Scan done from last consumption point backward in the supply chain (for example, from a finished product towards raw material or packaging material).

Tracking: Scan done from the original point towards final consumption (for example, from raw material or packaging material towards finished product).

Traceability: Capacity to identify and locate raw materials, components and products throughout all the stages of receiving, production, process and distribution, both forward and backward.

Withdrawal: Voluntary retention of the product before it leaves direct control of the producing facility, distribution or sales center, so that it is not released for consumer sale. This retention may result from the following problems: quality, food safety, legality or external factors. The Crisis Committee of the Business Unit participates in the decision to perform a withdrawal.

4. **Responsibilities**

Global Quality and Food Safety Department: To establish, update, communicate and monitor the application of this policy.

Global Operations Department. To ensure project management and resource allocation for the Business Units, according to the policies and guidelines of Grupo Bimbo that allow the development of secure processes for food safety and the quality of products.

Crisis committee: To participate in the decision-making process for withdrawals and recalls. If the withdrawal is due to a safety issue, it shall be communicated to any stakeholders, such as external certification bodies.

Business Unit Presidents and Functional VPs (Operations, Maintenance, Procurement, Logistics and Sales). To supply financial resources and the necessary personnel for the implementation of this policy.

Leaders of each supply chain stage of the Business Unit. To apply this policy in each process stage that corresponds to his/her functions.

Leaders of each supply chain stage at production centers. To apply this policy in each process stage that corresponds to his/her functions.

Production center Manager. To ensure the communication inside and outside the team that performs traceability, as well as the reliability and sufficiency of the gathered information.

Food Safety / Quality Assurance Leaders at production center. To manage and maintain the traceability system, in order to always guarantee the right information of the products that are produced, as well as of raw material, in process, rework, recovery and packaging material in contact with food. Also, to facilitate training to process participants.

5. General Guidelines

With the aim of protecting the population's health and to guarantee the supply of safe products, it is the policy of Grupo Bimbo that all responsables of production centers and GB Business Units comply with the following guidelines about the traceability system, in case of making a recall or withdrawal and to minimize the occurrence of a crisis.

Requisites

The responsables of all production centers or subsidiaries that manufacture products with GB brand must:

- Ensure that all manufactured products, raw material, in-process material, rework and packaging material are identified with a descriptor (for example: batchcode, lot number, etc.) so that they might be traced/tracked through the supply chain.
- Have a multidisciplinary team (including deputy members), that has defined roles and responsibilities for each team member. These members may also be part of the production center crisis committee.
- Comply with the **PGB-QS-03 Global Traceability Procedure** so that, based on it and the guidelines of this policy, sites are able to accurately perform the traceability process.
- Have a traceability drill or test program, which:
 - Includes at least one tracking and at least one tracing exercise each year.
 - Includes export products and/or preserved identity products. Examples: Kosher, Halal, GMO free, etc., when the facility handles them.
 - Must be documented. If non-compliances in the execution are found, these must be corrected within 28 calendar days after their detection.
- Adhere to traceability laws from the country of sale or to client requirements, where existing.
- Notify all interested parties, such as institutional clients and certification bodies, about real incidents, clearly communicating the situation is and confirming if supply is at risk. All official communication to these parties must be done through the crisis committee of the Business Unit.

Results

- All traceability reports must contain:
 - Physical or electronic copy of all manufacturing, distribution and storage records, and ensure that all these documents are in a safe place and that they are available.
 - Real time in which the traceability was performed. The maximum defined time to complete the process is **4 hours, covering all the way from raw materials to the sales centers**. This time may be modified in line with specific client's requirements.
 - Match between finished product and mass balance, including possible reprocess that may have been performed. It is considered that a traceability is successful when there is a 100% +/- 2% in the mass balance calculations. The equation to determine the effectivity % of the mass balance is:

$$\frac{\text{Packed product} + \text{scrap} + \text{rejected product}}{\text{Total retained or identified product}}$$

- Total quantity of identified/recovered product.
- Final traceability report, that is the base to perform the needed corrective and/or preventive actions.
- Learned lessons.
- Copy of the report to the Crisis Committee, in case one of these has requested the traceability.
- The decision to recall product from the market must be a process performed by the production center crisis committee. However, the recall must be authorized by the Business Unit's crisis committee.
- The traceability report must be kept for at least the shelf life of the product.
- For details on the application of this policy, refer to the **PGB-QS-03 Global Traceability Procedure**.

6. **Responsibility / Ownership**

The Global Quality and Food Safety 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 Global Internal Control and Risk Management Department, 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	August 13th, 2020	Mariana Nieto	<ul style="list-style-type: none"> • Mitzy Vite • Jorge Enrique Guerrero 	<ul style="list-style-type: none"> • Definitions of withdrawal and recall become more specific. • Scope changes from "raw materials to point of sale" to "raw materials to sales centers".