

## 1. Purpose

To establish general guidelines regarding the operation of the Grupo Bimbo Speak-Up Line.

## 2. Scope

This policy applies to the Presidents and Functional VPs of all Business Units, affiliates and subsidiaries of Grupo Bimbo, in their different locations.

## 3. Definitions

**Bad faith:** refers to seeking to deceive, to harm, or to obtain a personal benefit, by concealing an error or manipulating information, facts or indications.

**Good faith:** refers to acting with honesty, loyalty, and with good intentions (e.g., report based on facts to reveal a breach of norms, policies, or laws.)

**Report:** comments, suggestions and complaints regarding any non-compliance with Grupo Bimbo's Code of Ethics or its policies.

**Speak Up Line:** Grupo Bimbo's communication channel for associates, suppliers and third parties who need to report any violation of the Code of Ethics, Code of Conduct for Suppliers, any Grupo Bimbo Policy, or applicable local law that involves any associate.

## 4. Responsibilities

**Global Institutional Relations Department:** follows up and submits a quarterly executive report to Grupo Bimbo CEO's Office on reports received at the Grupo Bimbo level.

**Business Unit's Speak-Up Line Committee:** investigates, gives a solution to the report, and informs the Call Center of the results, no later than 30 (thirty) working days after its creation (any breach of this deadline must be justified), as well as implement and provide continuity to the action plans.

**Global Internal Audit and Global Security & Protection Departments:** investigate fraud-related reports.

**Call Center:** channels the reports that it receives to the executive of the Business Unit's Speak-Up Line Committee and, only in the case of Mexico, LAS, LAC, BB, BQ, and BUK, also to the executive of the Corporate Speak-Up Line Committee.

**Speak-Up Line Executive:** for the Business Units not mentioned in the previous paragraph, sends the reports received and the solution for each case to the executive of the Corporate Speak-Up Line Committee.

## 5. General guidelines

For Grupo Bimbo, associate concerns have an absolute value and are important for individual respect and to ensure an adequate working environment; therefore, the communication program is based on respect towards people, always in compliance with the **GGB-001 Grupo Bimbo Code of Ethics, FGB-EHR-01 Global Human Rights Policy (External Policy), GGB-020 Global Fraud Risk Management Policy** and the **FGB-EPR-03 Grupo Bimbo Supplier Code of Conduct**; as such, it is Grupo Bimbo's policy that leaders (immediate supervisors), Organization and Functional leaders comply with the following guidelines:

- Ensure that all associates, suppliers and third parties who have contact with Grupo Bimbo are aware of the Speak-Up Line.
- Receive the reports that the associates wish to make from a specialized call center that is external, independent and located outside the corporate offices of each Business Unit.

- Establish the communication and channels and other contact means (e.g., website, e-mail, telephone numbers), at no cost to the associate, supplier or third party, and that are always in compliance with the legislation enforced in the location or country.
- Guarantee the confidential handling of the report and resolution therein, without affecting the labor, commercial or any other relationship with the people involved, provided that the investigations show that those involved have acted pursuant to the culture of Grupo Bimbo and in compliance with current policies.
- Avoid requesting the identity of the user, in order to receive the report.
- Avoid recording calls and tracking reports received via the internet.
- Ensure the training of the people responsible for performing investigations, following up on reported facts, and for communicating the findings.
- The Speak-Up Line Committees of each Business Unit should hold a meeting at least once a year, or more often if a case requires it, and then send the minutes to the Speak-Up Line Executive of the Corporate Office.
- If a member of the Speak-Up Line Committee of a Business Unit is involved in a report, the Corporate Committee will resolve the case.
- Ensure the following:
  - Every person reporting an incident in "good faith" through the Speak-Up Line should be protected against any retaliation derived from the report. If the investigation reveals that the complaint is not well-founded, or if the suspicion is untrue, that will not be a reason to take any action.
  - In the event that the person has acted "in bad faith", depending on the seriousness, he/she may be subject to a sanction or even the termination of the contract, as determined by the Committees of each Organization.

#### **Contact channel**

- <https://gbconnect.sharepoint.com/sites/GB-on/Ethics/SpeakUpLine/default.aspx?ln=en>

#### **6. Responsibility / Ownership**

The Global Institutional Relations Department is the assigned owner of this policy and is primarily responsible for its contents, updating, monitoring compliance and its submission for approval before the Steering Committee and CEO.

#### **7. Updates**

The changes implemented in between versions are described below:

Revisions / History of revisions				
Version	Revision date:	Updated by:	Approved by	Main Changes
1				
2	June 2021	Global Institutional Relations Department	Global Internal Control Department	Addition of guidelines on: <ul style="list-style-type: none"> <li>• Incidents that can be reported</li> <li>• Speak Up Line Committee Sessions</li> <li>• No retaliation</li> <li>• Contact means</li> <li>• Fraud Risk Management</li> </ul>