

## 1. Purpose

To establish the general guidelines for entering into transactions between Grupo Bimbo, S.A.B. de C.V. ("Grupo Bimbo") and its Subsidiaries, as well as those cases that will require special authorization by the CEO or Board of Directors.

## 2. Scope

This policy is applicable to all subsidiaries of Grupo Bimbo.

## 3. Definitions

**Control:** Ability to carry out any of the following actions:

- a) To enforce, directly or indirectly, shareholders', partners' or administrative bodies' decisions at general meetings; or to appoint or dismiss the majority of the directors, managers or equivalents, in a legal entity.
- b) To own rights that allow to vote, directly or indirectly, on more than 50% of the share capital of a legal entity.
- c) To lead, directly or indirectly, the administration, strategy or main policies of a legal entity, whether through securities ownership, by contract or in any other way.

**Operations:** Including, but not limited to: (i) acquisition or transfer of tangible and intangible assets or rights, (ii) provision of services, (iii) financing, (iv) exploitation, use or enjoyment of tangible or intangible assets and (v) granting guarantees or assumption of liabilities.

**Subsidiary:** Any company in which Grupo Bimbo maintains control, whether by direct or indirect participation in its capital stock, through agreements or for any other reason.

## 4. Responsibilities

**Grupo Bimbo's Board of Directors, CEO or Finance Committee (as applicable):** To authorize transactions between Grupo Bimbo and its Subsidiaries, or between the latter, when they do not comply with the guidelines set forth in this policy.

## 5. General guidelines

Transactions carried out between Grupo Bimbo and any of its Subsidiaries, or those carried out between the latter, shall:

- I. Be part of Grupo Bimbo or its Subsidiaries' ordinary course of business, and
- II. Be performed in accordance with market prices, considering costs and amounts of considerations that would have been used with or between independent parties in comparable operations, taking into account the characteristics and specific elements for each operation or, if applicable, supported by external valuations performed by specialists. This point will not be applicable when the legal provisions establish or allow something different.

In the event that a transaction is intended between Grupo Bimbo and one or more of its Subsidiaries, or between the latter, and it does not comply with the guidelines set forth in the preceding points, it must be approved by the CEO, the Finance Vice President, the Finance Committee or the Board of Directors, in accordance with the applicable amounts established in the corresponding regulations and authority delegation.

## 6. Responsibility / Ownership

The Global Legal and Compliance 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:

Revisions / History of the revision				
Version	Revision date	Updated by	Approved by	Main Changes
1				