

1. Purpose

To establish general guidelines for Treasury operations to preserve the integrity of financial resources and information, mitigate financial risks and ensure business continuity for Grupo Bimbo and its subsidiaries.

2. Scope

This policy applies to associates in the areas of Administration and Finance, Systems, Legal and Procurement, both at the Global level and for each of Grupo Bimbo's subsidiaries and affiliates.

3. Definitions

Cash Management: Ordinary management of the company's operating resources (collections and payments) to ensure an efficient operation, as well as the liquidity necessary for the operation. Includes the organization and administration of an efficient bank account structure to facilitate the transfer and movement of funds.

Derivative Financial Instruments: Negotiable financial instruments, in which the price or value depends on one or more variables related to an underlying asset. Commonly, the underlying assets are currencies, products, commodities, interest rates, exchanges and stocks.

FGB-TR-06 Global Financial Counterparties Policy: Policy issued by the Global Treasury & Insurance Department, which establishes general guidelines about the financial institutions authorized to work with Grupo Bimbo and its subsidiaries.

Financial Margin: Internal profitability analysis used to determine the net return on investment considering the standalone cost of financing for each subsidiary. This analysis is used to make optimal capital structure decisions, such as leverage levels.

Financing and Cash Management Calendar: Calendar issued annually by the Global Treasury & Insurance Department with deadlines of the responsibilities of the Global Treasury & Insurance Department and the subsidiaries of Grupo Bimbo.

Financing Transaction: Includes any type of bank financing, working capital solution, leasing operation (when the nature of the asset and transaction are understood as a financing operation) or any other transaction of a similar nature.

Grupo Bimbo's Public Financial Statements: Grupo Bimbo S.A.B de C.V.'s financial statements or any financial information available in the official Grupo Bimbo investor webpage.

Grupo Bimbo Steering Committee: Executive body conformed by Grupo Bimbo's CEO and his direct reports.

Individual Financial Statements: Financial statements or financial information from any subsidiary or Business Unit within Grupo Bimbo that are different from Grupo Bimbo's Public Financial Statements. These include, but are not limited to the balance sheet, income statement, cash flow statements, changes in equity, financial projections, other relevant financials, among others.

OTC Derivatives (*Over the Counter*): Customized financial instruments negotiated bilaterally and operated in non-standardized stock exchanges.

Treasury Operations: All those processes and activities related to treasury management (e.g. interest payments, derivatives, inter-company loans, debt bonds, repurchase fund, among others).

4. Responsibilities

Administration & Finance Areas of Grupo Bimbo subsidiaries: To adhere to and ensure compliance with this policy and associated procedures and controls deriving from it, in its management area.

Global Treasury & Insurance Department: Regulate and, in some expressly defined cases, approve and execute treasury operations throughout Grupo Bimbo and its subsidiaries, among other financial operations; which include: Cash Management, financing operations, among others.

Global Financial Risks Department: Regulate, approve, and execute risk management and financial asset management operations in Grupo Bimbo and its subsidiaries, as well as monitor liquidity risk levels in each subsidiary.

Global Controllership Department: To act together with the Global Treasury & Insurance and the Global Financial Risks Departments, as a complementary control party, regarding issues covered in this policy, as well as of the procedures and controls that derive from it.

Global Legal Department: To review and, if appropriate, to approve all documents related to Treasury operations in what corresponds to its management scope.

Global Systems Department: Approve, at the request of the Administration & Finance Departments of the subsidiaries and, where appropriate, support in the implementation and certification of electronic banking services, internal and / or external communication requirements, and any other electronic service necessary for the Treasury operations, paying special attention to security matters.

Global Procurement Department: To understand and adhere to this policy with respect to Risk Management, the use of Derivative Financial Instruments and granting financial information and guarantees.

5. General Guidelines

To preserve financial resource integrity, mitigate risks and ensure the continuity of Grupo Bimbo's operation and that of its subsidiaries, the following is established:

Cash Management

The operation of Grupo Bimbo's Treasury and that of its subsidiaries demands the design and operation of an optimal Cash Management scheme that should serve the business model of the local operation, efficiently manage the integrity and security of financial resources, ensure operation continuity and mitigate the inherent risks of the processes. This scheme shall align to best-in-class market practices and to Grupo Bimbo standard processes, according to the following:

a. Bank Accounts and Signatories Structure

The Global Treasury & Insurance and Financial Risks Departments will have sole responsibility for:

- Defining, through the **FGB-TR-06 Global Financial Counterparties Policy**, the criteria that determines the financial institutions authorized to maintain a business relationship or provide financial products or services to Grupo Bimbo and subsidiaries. Notwithstanding the forgoing, the **FGB-TR-02 Global Investments and Cash Surpluses Policy** and the **FGB-TR-07 Global Policy for Market Risk Management** shall apply to products or services designed for cash investments or financial derivative instruments.
- Maintaining a detailed inventory of the bank accounts of Grupo Bimbo and subsidiaries, which shall include attorneys-in-fact, signatories, and related GL accounts. The report shall be submitted to the

Global Comptroller Department within the timeframes established in the Financing and Cash Management Calendar.

The Business Unit Presidents, General Managers and/or, senior associates in areas of Administration & Finance of the subsidiaries, must:

- Approve and maintain an optimal structure of bank accounts necessary for the Treasury operation.
- Approve and maintain an updated bank account inventory, including attorneys in fact, signers with joint authority, and GL accounts. Joint faculties granted to attorneys in fact and signatories shall be kept for existing bank accounts as well as for any related service.
- Report to the Global Treasury & Insurance Department, in writing, any changes in the bank account structure, legal representatives, or signatories. Such notice must be given at the time the changes become effective.
- Approve and maintain a user structure that defines faculties to operate in electronic banking platforms. The structure must segregate faculties by defining the following roles: administrator, operator, authorizer, and query-only; administrators and authorizers must be allowed to act strictly in a jointly basis.
- In case of using systems for Treasury operation purposes (e.g. Enterprise Resource Planning), approve and maintain a user inventory with duly assigned faculties that ensures faculty segregation and joint authorizations, as in the previous point.

The Administration & Finance areas of the subsidiaries must:

- Design and submit for authorization of Business Unit Presidents, General Managers and/or, senior associates in areas of Administration & Finance of the subsidiaries:
 - An optimal bank account structure (including signatories) for the Treasury operation, according to its business model.
 - The complete bank account inventory, including attorneys in fact, signers with joint authority, and GL accounts.
 - The active user structure and associated entitlements for each electronic banking platform. Entitlements must reflect a clear segregation of duties and shall be defined by the following roles: administrator, operator, authorizer, and query-only; administrators and authorizers must be allowed to act strictly in a jointly basis.
 - The inventory of users duly authorized to access any system necessary for the Treasury operation (e.g. Enterprise Resource Planning), with such access designed to reflect a clear segregation of duties and joint authorizations.
- Ensure all existing bank accounts have a up to date GL account reference.
- Submit a complete bank account inventory to the Global Treasury & Insurance Department, including attorneys in fact, signers with joint authority, and GL accounts, according to the timeframes established in the Financing and Cash Management Calendar. Such updates should also be provided whenever significant changes are performed.
- Request authorization from the Global Treasury & Insurance Department to initiate or end a business relationship with a financial institution.
- Inform the Global Treasury & Insurance Department whenever a bank account is opened or closed, together with the corresponding business rationale behind the decision.

In its role as a complementary control body, the Global Controllershship Department will:

- Review the bank account list to confirm GL references, attorneys-in-fact and signatories. The Global Treasury & Insurance Department will compile and provide the list on an annual basis, based on information provided by the Administration & Finance areas of each subsidiary.
- In case discrepancies are identified, Business Unit Presidents, General Managers and/or, senior associates in areas of Administration & Finance of the subsidiaries will be requested to make the necessary corrections promptly.

b. Expense and Payment Mechanisms

Upon determination of the Global Treasury & Insurance Department or when requested by the Administration & Finance areas of the subsidiaries, the Global Treasury & Insurance Department will provide support in the selection and implementation of payment mechanisms for their Treasury operations. The selection process will consider many factors, including cost, service, functionality and security, the **FGB-TR-06 Global Financial Counterparties Policy** and the role of the Global Treasury & Insurance Department as responsible for Grupo Bimbo's banking relations.

Business Unit Presidents, General Managers and/or, senior associates in areas of Administration & Finance of the subsidiaries, must:

- Authorize the appropriate payment mechanisms for the Treasury operation.
- Authorize and maintain an updated catalog of associates authorized to make payment requests, new beneficiary registries or changes in bank account information, which shall include limits (individual or joint) according to each individual function or scope of responsibility. The catalog shall also include updated telephone numbers and signatures of all associates authorized to make payment requests and it shall remain available, physically or electronically, for all team members involved in payment processes, and safely stored.
- Authorize and follow controls and guidelines for use of password and access devices for electronic banking platforms, as established in the Bank Accounts and Signatories Structure section of this policy.
- Authorize and ensure controls are established for check handling and custody procedures.
- Authorize and maintain a contingency plan associated with critical treasury processes that allow business continuity. Trials shall be performed at least twice a year to ensure the contingency plan is functional.
- Define and distribute an action plan for potential fraudulent payments to associates involved in Treasury processes. The action plan should include procedures for immediate communication to the Business Unit President of the subsidiary involved, and to the Global Treasury & Insurance, Legal, Audit, Internal Control, Communication and IT Departments, and Chief Information Security Officer. Regarding external communication, the financial intelligence department of the banking institution or institution involved must be informed immediately upon discovery of fraud because prompt and timely action is essential to neutralize or minimize the impact of possible fraud.

The Administration & Finance areas of the subsidiaries must:

- Evaluate, implement and manage the appropriate payment mechanisms for the Treasury operation, paying special attention to their security and favoring electronic means of payment.
- Provide a proposal and request authorization from the Business Unit Presidents, General Managers and/or, senior associates in areas of Administration & Finance of the subsidiaries for the following controls:
 - The catalog of associates authorized to make payment requests, new beneficiary registries or changes in bank account information.
 - Controls and guidelines for use of password and access devices for electronic banking platforms.
 - Necessary controls for check handling and custody procedures.
 - Processes to register new bank accounts or changes to third-party bank account information.
 - The contingency plan associated to critical Treasury processes that allow business continuity.
 - The action plan for potential fraudulent payments, which includes appropriate notification and communication procedures.
- Ensure that all payments, regardless of the mechanism, are requested and authorized by associates that have authorization to do so. The foregoing, with the understanding that, any outflow of financial resources must be directed through a corresponding payment request and authorization process that in all cases requires the participation of two signatories or authorizers other than the initial operator, if the payment has been executed through electronic mechanisms.
- Comply with the following measures in daily Treasury processes to reduce the risk of fraud.

- Avoid making payments with a sense of urgency. All payment requests must follow the established procedures.
- Conduct a verbal confirmation (in-person or via telephone) with the requestor associated with a payment request containing new beneficiaries, extraordinary amounts or payment concepts, changes to bank instructions, or any other suspicious feature.
- Conduct a verbal confirmation (in-person or via telephone) with either a Business Unit President, General Manager and/or, senior associate in areas of Administration & Finance, prior to processing a payment request that is destined for a non-recurring country, or a country determined to be a high risk, including the following:

- | | | | |
|------------------|--------------------------|-----------------|---------------------|
| - Saudi Arabia | - UAE | - Jersey | - Pakistan |
| - Bahamas | - Philippines | - Kuwait | - Romania |
| - Bahrein | - Guernsey | - Liechtenstein | - Russia |
| - Bermuda | - Indonesia | - Malaysia | - Thailand |
| - Cayman Islands | - Isle of Man | - Mauritius | - Trinidad & Tobago |
| - China | - Canal Islands | - Nigeria | - Turkey |
| - Cyprus | - British Virgin Islands | - Oman | - Venezuela |

- In the case that payment mechanisms involve checks, check protection services offered by financial institutions shall be contracted to ensure that at the time of payment, a confirmation of all available security measures and controls has been made (e.g. check number, amount and beneficiary).

c. Host to host Operations (H2H)

The Business Unit Presidents or General Managers areas of Administration & Finance of the subsidiaries, must ensure:

- Implementation of the H2H channel for suppliers and payroll, in those subsidiaries that operate or are in the process of implementing OCloud.
- Hiring of a financial institution with a global scope and a relationship with the Global Treasury & Insurance Department, during the implementation of H2H, in the understanding that there may exist limitations in terms of the capabilities of such financial institution
- The Global Treasury & Insurance and Systems Departments are involved in the implementation process and during negotiations with financial institutions.

d. Third-Party Registration Management

For the registration or modification of the bank accounts of suppliers, creditors, and when applicable, clients, both in banking platforms and in the different Treasury systems (e.g. Enterprise Resource Planning), the Directors, Managers, or the highest-ranking member of the Administration & Finance at the subsidiaries must:

- When a request is received by electronic means, the first step is to validate the domain of the sender's email account and, if possible, its name, prior to the registration or modification of the banking information. In the specific cases, in which the entity has an official website on the internet, the received email's domain of origin must be validated vs. the website of the entity.
- Telephone call-back confirmation call must be made directly with the corresponding beneficiary (supplier or client), using the alternative contact information previously registered in the system or, when appropriate, the information provided by the requesting area.
- The person empowered to authorize the additions or modifications of banking information, must ensure that there has previously been a telephone call-back confirmation call; If none has been made, it will be their responsibility to make such confirmation call, based on what is mentioned in the previous point.

- The person responsible for making the confirmation with the beneficiary, must leave written evidence in a blog and will be responsible for its safeguarding.
- There must be an updated database that contains the contact information of the beneficiaries, as well as their registered bank account.
- For those Subsidiaries that have requested the administration service of their catalogs in the different systems of the Global Services, the Data Management Office area will be responsible for making a telephone call-back confirmation call.
- For new suppliers, as a complementary control to the “call back” process, and to strengthen the validation process of third-party accounts as well as ensuring the supplier’s bank account corresponds to the supplier, a payment test must be made with the minimum value allowed by the banking site or, when appropriate, using the official electronic platforms.

e. Authorization of Treasury operations

For the authorization of these operations, please see  **FGB-TR-01 Annex I.pdf**.

f. Collections / Revenues / Resource Concentration

As in the Expense and Payment Mechanisms section, upon determination of the Global Treasury & Insurance Department or when requested by the Administration & Finance areas of the subsidiaries, the Global Treasury & Insurance Department will provide support in the selection and implementation of collection mechanisms for their Treasury operations. The selection process will consider many factors, including cost, service, functionality and security, the **FGB-TR-06 Global Financial Counterparties Policy** and the role of the Global Treasury & Insurance Department as responsible for Grupo Bimbo’s banking relations.

The Business Unit Presidents, General Managers and/or, senior associates in areas of Administration & Finance of the subsidiaries, must:

- Authorize all optimal revenue collection mechanisms for the Treasury operation.
- Authorize and maintain at all times the tools and necessary controls to ensure visibility and availability of collections.

The Administration and Finance areas of the subsidiaries must:

- Design, implement and manage an optimal revenue collection structure for the Treasury operation, with special emphasis on security and availability of financial resources.
- Define the tools and controls needed to ensure monitoring and availability of collections. Proposed tools and controls shall be reviewed and approved by Business Unit Presidents, General Managers, and/or senior associates of Administration and Finance Departments of the subsidiaries,

Cash Flow Management

Efficient liquidity management is a fundamental activity for Grupo Bimbo in order to ensure resource availability and visibility at all times. Indeed, cash flows can have a significant impact on operational and corporate decisions and so must be managed with standardized tools and processes, therefore:

The Global Financial Risks Department will:

- Issue the set of policies that will regulate the cash flow management, as well as develop the necessary tools to comply with this administration.
- Monitor liquidity levels in each subsidiary on a monthly basis.

On the other hand, the Administration & Finance areas of the subsidiaries must:

- Prepare cash flow with daily visibility to manage and monitor the short-term cash position, including consolidated views, by date and by currency, as stipulated in the corresponding policies.

- Conduct mobile cash flow forecasts (at least twelve months) and keep them available for the Global Treasury & Insurance, Financial Risks and Financial Planning Departments.
- Define the resource requirements to ensure business continuity. In the case of needing resources, they must adhere to the section on "Sources of Liquidity and Guarantees" or, in the case of surpluses, to "Investments and Cash Surpluses" in the present policy.
- Determine the amounts and times for capital movements (increases and decreases) or any necessary debt provisions in coordination with the Global Treasury & Insurance Department and Financial Planning.

Market Risk Management and the Use of Derivatives

The objective of Grupo Bimbo's Market Risk Management strategies and those of its subsidiaries should be solely to reduce volatility and achieve greater stability in its operation and results; therefore, no hedging strategy can aim to obtain a financial benefit. The eventual contracting of a derivative financial instrument must necessarily be associated with a primary position that implies some risk, therefore:

The Global Financial Risks Department is solely empowered to:

- Issue the set of policies that will regulate the use of derivatives in Grupo Bimbo and its subsidiaries, which shall serve exclusively as a hedge and must be approved by the Global Administration & Finance Department.
- Define the approved counterparties to execute derivatives, according to the corresponding procedures.
- Negotiate the necessary agreements for the execution of OTC (Over The Counter) derivatives for Grupo Bimbo and its subsidiaries.
- Coordinate, together with the Global Controllershship Department, the relationship with external auditors regarding hedging approvals and corresponding documentation.

Exchange Rates and Interest Rates

Grupo Bimbo and its subsidiaries face permanent exposure to exchange rate-based price movements on a wide variety of their inputs and other expected expenditures. The effect of the exchange rate on the price of these expenses materializes implicitly or explicitly in the documents that cover the respective purchases, therefore:

The Global Financial Risks Department must:

- Issue the set of policies that describe the applicable guidelines.
- According to the **FGB-TR-07 Global Policy for Market Risk Management**, define the strategy for the exchange rate risk management associated with inputs, purchasing of fixed assets and other expected expenses, either through the approval of commercial negotiations with suppliers to determine future prices (fixed, predefined and denominated in local currency) or the execution of traditional hedging instruments (purchase of dollars and derivative financial instruments). The detailed updated strategy is found in Annex A of the Global Policy of Financial Risk Management.
- According to the **FGB-TR-07 Global Policy for Market Risk Management**, define and execute the foreign exchange risk management and interest rate strategy associated with financing activities and balance sheet positions for Grupo Bimbo and its subsidiaries.
- Submit and document in a quarterly basis to the Finance and Planning Committee the instruments and strategies executed by the risk management team. This report shall include the executed positions, counterparties, type of instrument and market value.

The Administration & Finance areas of the subsidiaries must:

- Manage the derivatives portfolio executed by the Global Financial Risks Department.
- Register the derivatives according to the procedures regulated by the corresponding policy.

Any change in strategy related to FX rates or interest rates, either in notional amounts or tenor and/or of any type, must be approved by:

- Grupo Bimbo's CEO, when it represents less than 3% of sales with a maximum horizon of 5 years.
- Grupo Bimbo's CFO, when it represents less than 1.5% of sales with a maximum horizon of 3 years.

The Finance and Planning Committee shall review and authorize the **FGB-TR-07 Global Policy for Market Risk Management** at least on a biannual basis.

Investments and Cash Surpluses

The administration of Grupo Bimbo's financial assets and those of its subsidiaries aims to preserve the economic value in a manner consistent with the profitability offered by the financial markets, to meet liquidity needs and to maintain adequate diversification, therefore:

The Global Treasury & Insurance and Financial Risks Departments will:

- Issue the set of policies that will regulate financial asset administration and cash holding, mitigating market, credit, liquidity, concentration, and counterparty risk, among others.
- Supervise, monitor, and support the areas of Administration & Finance of the subsidiaries in the management of investments and cash surpluses.

The areas of Administration & Finance will:

- Invest surpluses according to their daily cash flow forecast and the parameters established in the corresponding policies, which include:
 - Maintaining and investing cash surpluses in the currency in which it was generated and not incurring in foreign exchange transactions, except those defined in the sections of "Cash Flow Management" and "Market Risk Management and the Use of Derivatives" of this policy.
 - Investing the surplus exclusively in government, bank, and corporate debt instruments with a minimum rating lower than the sovereign risk rating according to the country and currency concerned.
- Review the documents associated with the investment instruments.
- Inform the Global Financial Risks Department, monthly, of the amount, rate and term of the investment, as well as the financial institutions involved in the operation.

Sources of Liquidity and Guarantees

Grupo Bimbo and its subsidiaries require liquidity sources to fund both the short-term cash needs of the business, including financial obligations, as well as long-term investment plans. Accordingly, it is important to ensure that these resources are obtained in conditions that are in accordance with their credit risk and market practices applicable to each business.

In addition, Grupo Bimbo and its subsidiaries face, on an occasional basis, the need to grant guarantees to third parties for operations of diverse nature. These guarantees can be requested by different counterparties, including financial institutions, suppliers, among others. If approved, they must also reflect conditions in accordance with their credit risk and obligations consistent with the nature of each operation.

Grupo Bimbo's subsidiaries are not allowed to grant guarantees. Grupo Bimbo and its subsidiaries may grant, on an exceptional basis and with the approvals mentioned in this policy, a guarantee only when the lack thereof results (in the context of a financing) in a transaction being unfeasible or results in a clear and documented divergence from Grupo Bimbo's standard credit conditions (including price, covenants, among others).

To ensure the proper management of Grupo Bimbo's assets and its commercial relations, Grupo Bimbo's subsidiaries are prohibited from engaging in factoring operations (also known as portfolio discounting, sale

of accounts receivable, among others). Any exceptions must be approved by the Global Treasury & Insurance Department and the Global Comptroller Department.

Thus, to appropriately satisfy liquidity demands and guarantees potentially granted, the Global Treasury & Insurance Department must comply with the following:

For everything related to liquidity sources:

- Define, through the **FGB-TR-06 Financial Counterparties Global Policy Management**, the criteria that designates the financial institutions approved to have a business relationship with and act as creditors, agents and intermediaries in the various financing operations of Grupo Bimbo and its subsidiaries.
- Approve, execute and manage financing operations.
- Analyze and approve the cases in which, on an extraordinary basis, factoring operations are required, accompanying the Administration & Finance areas of the subsidiaries in the execution of these operations.
- Approve and, if applicable, accompany the Administration & Finance areas of the subsidiaries in structuring and documenting all financing operations and granting of guarantees, to ensure that they comply with the standard credit conditions in force for Grupo Bimbo.
- Monitor, at least quarterly, the level of leverage of Grupo Bimbo's subsidiaries through the financial margin, to determine, in conjunction with the corresponding areas, the convenience of keeping them leveraged and/or incur in additional financial debt.

For everything related to guarantees:

- Approve, execute, and manage the granting of guarantees.
- Approve and grant guarantees in conjunction with the Global Legal Department. In the context of financing operations, the guarantees shall seek to ensure that the financing meets Grupo Bimbo's credit risk conditions in force.
- Monitor, at least semiannually, the guarantees in force of Grupo Bimbo's subsidiaries.

The Business Unit Presidents, General Managers and/or, senior associates in areas of Administration & Finance of the subsidiaries, must:

- Obtain authorization from the Global Treasury & Insurance Department to execute any financing operations.
- Obtain authorization from the Global Treasury & Insurance Department and document the need to justify the granting of any type of guarantee (e.g. real guarantees, unsecured, deposits, among others) to any type of counterparty (e.g. financial institutions, suppliers, among others.)
- Ensure that all executed financing operations comply with Grupo Bimbo's credit standards, for which they will always have the support of the Global Treasury & Insurance Department.
- Obtain the Global Treasury & Insurance and Fiscal Department's authorization to carry out any intercompany credit with a financial nature.
- Ensure that factoring operations are not carried out, except for those cases authorized by the Global Treasury & Insurance Department.
- For all financing operations, obtain at least two quotes from different counterparties, documenting the rationale for making the final decision.
- Ensure that any financing operation, as well as any guarantee to be granted, is reviewed and approved by the Global Treasury & Insurance and Legal Departments on the understanding that, in the case of real guarantees (in which an asset is granted as guarantee), it will be necessary to obtain special authorization from the Global Legal Department.
- Ensure that all financing operations, as well as the issuance of any guarantee, have all the corporate authorizations of their corresponding corporate bodies, in accordance with their own statutes and policies.
- Register in the accounting and manage the financing related operations and current guarantees, including inter-companies' transactions.

- Submit the deliverables specified in the Financing and Cash Management Calendar to the Global Treasury & Insurance Department, in accordance with such calendar, or more frequently in the event that relevant changes so require.

Additional Key Controls in Fraud Prevention and Business Continuity

The Global Treasury & Insurance Department will execute the treasury operations of those subsidiaries to which it provides transactional treasury services, in accordance with established procedures.

The Business Unit Presidents, General Managers and/or, senior associates in areas of Administration & Finance of the subsidiaries, must:

- Ensure that a bank reconciliation is performed daily and by personnel unrelated to any treasury process (e.g. payments, collection, etc.) so that any unrecognized transaction is clarified as soon as possible, and if considered suspicious, it is immediately attended.
- Make sure all critical processes have updated contingency plans that allow business continuity.
- Define and implement (within its scope of control) controls to mitigate risks associated with fraudulent activities and / or financial crimes, including money laundering and cybercrime.
- In the event of requests for payment or registration of bank accounts from members of the GB Steering Committee, Vice Presidents, General Managers or higher-ranking personnel within the Organization, regardless of the means of the request received, a "call back" must be performed to the previously known requester's telephone number and under no circumstances should the telephone included in the request email be used. It is forbidden to make the payment without having made such confirmation, regardless of the urgency.
- Maintain all financial resources in legal tender currencies and in no case use unregulated digital / virtual currencies (bitcoins).
- Document and record (prior review, negotiation, and authorization of the Global Controllershship, Legal and Fiscal Departments of their respective terms) the contracting of any banking product or service and financial instrument and make comparisons against the market in reasonable periods of time.
- Confirm that costs or fees associated with the different products or banking services are charged correctly and in a timely manner at least monthly.
- Issue additional Treasury procedures and design specific controls associated with its own operation and business model, which complement and comply with this policy, in the understanding that the Global Treasury & Insurance Department may provide support whenever requested.
- Request authorization from the Global Treasury & Insurance Department to procure and/or use any specialized treasury management system. Global Treasury & Insurance Department will evaluate available alternatives in the market to make sure the requested system is compatible with global Treasury management procedures within Grupo Bimbo, and meets security standards required by the Global Systems Department.
- Consult and, if applicable, request authorization from the Global Treasury & Insurance Department for any case not included in this policy, other applicable policies, or procedures.

Individual Financial Statements

- The financial information of the subsidiaries is confidential and, given its sensitivity, it is prohibited to share Individual Financial Statements with any counterparty and / or entity external to Grupo Bimbo.
- To maintain the confidentiality of financial information, the Global Treasury & Insurance Department must approve, together with the Global Legal Department and the Global Controllershship Department, any request to share individual financial statements, including the situation in which such information is to be shared, be a regulatory requirement.

The Business Unit Presidents, General Managers and/or, senior associates in areas of Administration & Finance of the subsidiaries, must:

- Refrain from sharing individual financial statements with any entity external to Grupo Bimbo, including financial institutions, suppliers, among others. Only Grupo Bimbo's public financial statements may be shared.
- If it is necessary to share individual financial statements, joint written authorization must be obtained from the Global Treasury & Insurance Department, the Global Legal Department, and the Global Controllershship Department, before sharing such information. This scenario contemplates the need to provide, by regulation, financial information to a counterpart, as well as the delivery of individual financial statements to financial institutions, suppliers, among others
- If a guarantee is requested, share in writing to the addresses of the previous point, a confidentiality agreement executed by the counterparty that requests the individual financial statements. This confidentiality agreement must be previously approved by the Global Legal Department.

Non-compliance and Sanctions

The Global Administration & Finance Department shall be responsible for dictating, in conjunction with any other relevant authority, the disciplinary measures (as established in Grupo Bimbo's regulatory framework) that will correspond to any infringement to the scope of this policy. These measures must be applied by management and shall be executed without prejudice to the corresponding legal, administrative or civil procedures.

6. Responsibility / Ownership

The Global Treasury & Insurance / Financial Risks 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	November 2017	María José Porrero Vaqueiro y Tania Dib Rodríguez	Global Internal Control / Global Treasury Departments	
2	October 31, 2017	Dirección Global de Tesorería	Global Internal Control / Global Treasury Departments	<p>Exchange and interest rates The Global Treasury must:</p> <ul style="list-style-type: none"> • Issue the set of policies that describe the applicable guidelines. • Define the strategy that contains the notional and tenors for the exchange rate risk management associated with inputs, purchasing of fixed assets and other expected expenses, either through the approval of commercial negotiations with suppliers to determine future prices (fixed, predefined and denominated in local currency) or the

				<p>execution of traditional hedging instruments (purchase of dollars and financial derivative instruments), which will include deadlines and amounts. This strategy must be approved by the Global Chief Financial Officer. (The current strategy is detailed in Annex A of the Global Exchange Risk Policy.)</p> <ul style="list-style-type: none"> Define and execute the strategy for the management of Exchange rate and interest rate risks associated with the financing activities and balances of Grupo Bimbo and its subsidiaries. This strategy must be approved by the Global Chief Financial Officer. <p>The Chief Executive Officer of Grupo Bimbo must authorize the strategies for exchange rate risk management and interest rates.</p>
3	July 2019	Global Treasury Department	Global Internal Control / Global Treasury Departments	<ul style="list-style-type: none"> Definitions of: Financing and Cash Management Calendar, Financing Operation and <u>FGB-TR-07 Global Policy for Market Risk Management</u> were added. Precisions on the IT responsibilities. In the section of Cash Management within “Bank Accounts and Signatories Structures” and Collections / Revenues / Resource Concentration” guidelines were added for the Business Unit Presidents, General Managers and/or senior associates of Administration and Finance, as well as guidelines for the Administration and Finance areas of such business units. In the Exchange Rates and Interest Rates section, approval guidelines were added to the changes in the strategy related to these issues The title of “Miscellaneous” section was substituted for “Additional Key Controls in Fraud Prevention and Business Continuity” In sections “Sources of Liquidity and Guarantees” and “Additional Key Controls in Fraud Prevention and Business Continuity” responsibilities

				<p>for the Administration and Finance Areas of the subsidiaries which rely on the Business Unit Presidents, General Managers and/or senior associates of the corresponding areas were specified.</p> <ul style="list-style-type: none"> In section "Additional Key Controls in Fraud Prevention and Business Continuity" the specifications to perform bank reconciliations on a daily basis and to request authorization from the Global Treasury Department to procure and/or use any specialized treasury management system were added.
4	Dec 2020	Global Treasury Department	Global Internal Control / Global Treasury Departments	<ul style="list-style-type: none"> The scope is modified to include Grupo Bimbo's affiliates. The guidelines for the registration or modification of the bank accounts of suppliers, creditors and clients were added.
5	Mar 2021	Global Treasury Department	Global Internal Control / Global Treasury Departments	<ul style="list-style-type: none"> The "call back" guidelines are added in the processes of: Third party registration management and fraud prevention & business continuity.
6	Aug 2021	Global Treasury Department	Global Internal Control / Global Treasury & Insurance Departments	<ul style="list-style-type: none"> The guidelines for Liquidity Sources and Guarantees, Individual Financial Statements, Public Financial Statements, H2H Operations and the Global Financial Risks Department responsibilities were added.
7	June 2022	Global Treasury Department	Global Internal Control Department / Global Treasury Department	<ul style="list-style-type: none"> The section of "Non-compliance and Sanction" was added.
8	September 2022	Global Treasury Department	Global Internal Control Department / Global Treasury Department	<ul style="list-style-type: none"> The FGB-TR-01 Annex I is updated.