

## 1. Purpose

Establish the guidelines for the financial derivatives instruments within Grupo Bimbo ("GB" or "the Company") and its subsidiaries.

## 2. Scope

This policy applies to those responsible for the Administration and Finance area and the Procurement area, both on the global level and for each of the subsidiaries of Grupo Bimbo.

## 3. Definitions

**Exposure subject to hedge:** Exposure relating to a forecasted, highly probable, transaction that may have an impact on the company's results.

**Derivative ("Derivative Financial Instrument"):** Instrument whose value depends on the price of an underlying asset.

**Exotic derivative:** Any derivative financial instrument that has an unlimited risk profile on a leveraged position and whose potential loss is non-linear to movements in the underlying variable and which could materially affect the company's results.

## 4. Responsibilities

### **Global Treasury, through the Market Risk Management area:**

- Regulate the use of derivatives in Grupo Bimbo and its subsidiaries.
- Approve the counterparties for the financial derivatives agreements of any kind, including financial institutions, established brokerage institutions, among others.
- Coordinate, together with the Global Controllership Department, the relationship with external auditors regarding the approval and documentation of hedges.
- Negotiate the necessary agreements for the Over The Counter (OTC) derivatives execution for Grupo Bimbo and its subsidiaries.
- In accordance with the **FGB-TR-01 Global Treasury Policy** and the **FGB-TR-03 Global Foreign Exchange Risk Administration Policy**, define, manage and execute the exchange risk strategy associated with: a) the purchase of supplies and other expenses; and b) the financing activities and balance sheet positions of Grupo Bimbo and its subsidiaries. These strategies must be approved by the Chief Financial Officer.
- Follow up and report on a monthly basis the executed positions by the Global Treasury to the Global Internal Control and Risk Management Department.

### **Global Procurement Department:**

- Manage the price risks associated with purchases of supplies and commodities, including the design and implementation of strategies authorized by the Steering Committee; any changes to the current strategy must be authorized by the Chief Executive Officer of Grupo Bimbo.
- Identify the hedge ratio between the risk to be hedged and the derivative instrument to be used and, in order to ensure hedge accounting, obtain the approval of the Administration and Finance teams of each subsidiary or organization before executing any transaction.
- Prior to the execution, prepare the hedging documentation and effectiveness tests related to commodity derivatives for the instruments to qualify as hedges and obtain approval from the Chief Financial Officer, the Global Controllership Department and the Global Treasury.
- Negotiate and manage brokerage agreements with organized exchanges (brokerage contracts). OTC agreements, under this policy, are the responsibility of the Global Treasury.



- Follow up and report on a monthly basis the executed positions by the Procurement area to the Global Internal Control and Risk Management Department.

**Chief Executive Officer of Grupo Bimbo:** Authorize the price risk management strategies associated with purchases of supplies and commodities.

**Administration and Finance Areas of the subsidiaries:** Approve the strategies proposed by the Procurement area and verify that the conditions of the derivatives instruments are used for hedging, as well as approve the necessary documentation of coverage and evidence of effectiveness.

## **5. General guidelines**

Grupo Bimbo and its subsidiaries may only use financial derivatives to:

- Achieve the balance sheet structure regarding its liabilities with a balanced risk profile.
- Hedge currency exposure related to the expected cash flows in which the company or subsidiaries operates.
- Hedge the commodity price exposures.

The only objective of hedging strategies should be to reduce volatility and to achieve greater stability in the company's operations and results, so that no market risk management strategy can aim at to possibly obtain financial profit, therefore:

- The use of a derivative financial instrument must necessarily be associated with a primary position. Consequently, the notional amounts of one or all of the derivative financial instruments contracted for hedging shall be consistent with the amounts of the primary positions that represent or are deemed to represent a risk position.
- The company will not be able to carry out operations in which the intended benefit or objective pursued is premium income. If the company decides to carry out a hedging strategy in which different types of options are combined, the net payment of the associated premiums must be an egress for the company.
- The company will not be able to contract derivative instruments denominated "exotic."
- The relationship and communication with the external auditors is the sole responsibility of the financial areas and must be coordinated by the Global Treasury and the Comptroller Departments.
- All tools used for risk management must be properly documented and formalized.

## **6. Responsibility / Ownership**

The Global Treasury Department is the assigned owner of this policy and is primarily responsible for its contents, updating and presentation for approval to the Global Internal Control and Risk Management Department, 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				