

1. Objective

Establish general guidelines for the intellectual property, application, administration and management of the Grupo Bimbo ingredients, technologies and crown jewels, as well as to guarantee formulas confidentiality.

2. Scope

Applies to the associates in all Grupo Bimbo Business Units, whose responsibilities and functions are related to the development, applications, formula management, ingredients, technological solutions and crown jewels.

3. Definitions

Non-disclosure agreement (NDA): mutual agreement, through which both parties agree not to share information classified as confidential of the other one with third parties.

Brief of ingredients (brief): Document to request the development of new ingredients or technological solutions. It clearly indicates (i) the need for development, (ii) the relevant process conditions in which the ingredient will be used and (iii) the applicable legislation. It also guarantees Grupo Bimbo ingredients intellectual property with the suppliers.

Global tracker: Digital tool managed by the Global Research and Development and Operations Departments, to record and monitor all projects related to ingredients, technological solutions and crown jewels, identify synergies, common projects and saving opportunities between suppliers and GB Business Units.

Confidential information: information related to: documentation, inventions, ideas, concepts, models, manufacturing models, prototypes, designs and / or manufacturing plans, usage methods, process designs, operating conditions, equipment design, technical information, " know-how ", industrial secrets, economic processes, market reports, studies, plans, programs, drawings, photographs, videos, research, analysis, compilations, price information, terms and conditions concerning equipment, sales, engineering licenses and services, everything related to finance, business and market plans, legal issues, supplier lists, customer lists, potential customers, business prospects, business opportunities, business records, personal assignments, contracts, Grupo Bimbo assets and / or its affiliates and subsidiaries. In an enunciatively yet non-limiting way, it includes the following:

- Strategic initiatives or projects.
- Ingredients specifications and finished products.
- Income, future products and price speculation.
- Formulations and its detailed processes.
- Patented processes
- Non-public numerals (e.g. brands, products, number of plants, associates, etc.)

Ingredient: Material or substance used when manufacturing food products, additives included.

Crown jewels: Products from Grupo Bimbo portfolio that have high impact in its current market and that are appropriate to be promoted in other regions in order to strengthen global brands.

Intellectual property: Legal right that a company has over brands, designs, patents or others.

Research & Development site: Communication platform between the Global Research and Development and Operations Department and the technical community (new products, quality, technical services and

research and development areas). Used as data base and allows to present and share technologies and developments accomplished in Grupo Bimbo, such as: ingredients, processes, procedures, methodologies, etc.

Technological solution: Any ingredient or mixture of ingredients that could be developed, with suppliers; these ingredients have a specific functionality in the product or add a competitive advantage to the market.

4. Responsibilities

Global Research and Development Department: Establish, update, communicate and monitor the compliance of the policy, as well as generate and maintain, together with the Global Procurement Department, the list of authorized suppliers for each ingredient category.

Global Operations Department / Technical Services: Protect processes, equipment, process conditions and implementation of new technologies confidentiality.

Global Procurement Department: Ensure that Grupo Bimbo Global suppliers have signed a confidentiality agreement before starting any commercial relationship between companies, as well as generate and maintain, together with the Global Research and Development Department, the list of authorized suppliers for each ingredient category,

Business Units Presidents and Functional VPs of Research and Development, Operations and Procurement: Mainly responsible for understanding and implementing the policy, in all Business Units and corporate teams of Grupo Bimbo, as well as allocating the necessary resources for its compliance.

Local procurement responsible: Acquire the ingredients only from the suppliers listed in the approved Global Suppliers catalog as well as to ensure monitoring and compliance with the procurement process in their Business Units.

Ingredients and products development responsible (local NPD): Comply with this policy and ensure the protection of sensitive information, such as intellectual property of Grupo Bimbo.

Corporate technical services: Verify and supervise that the business Units carry out over Grupo Bimbo intellectual property; this validation will be done during the corporate functional reviews.

5. General Guidelines

In order to manage the development, application, administration and intellectual property of the ingredients, technologies and crown jewels of Grupo Bimbo, as well as to guarantee the confidentiality of the formulas, it is Grupo Bimbo's policy that associates responsible for these topics comply with the following guidelines:

- Any development of technological solution, ingredient or crown jewel must be managed through the Global Research and Development Department or the local New Products areas, as appropriate. The document to maintain its confidentiality will be the brief.
- The brief must be used in order to begin any new ingredient or technological solution request.
- It is strictly forbidden to share partially or totally the formulation of any product, as well as technical information related to the design of the functional ingredients and developed exclusively for Grupo Bimbo.
- All suppliers must sign confidentiality agreement (NDA). Local New Products development areas or the Global Research and Development Department, as appropriate, must ensure that the NDA is signed before any Project, together with the Global Department or local Procurement areas.
- The formula developer of new products must verify the period of validity and coverage of the NDA with the local Procurement area.

- Information considered as intellectual property of Grupo Bimbo or an industrial secret, it must be signed within a specific NDA for each project. Those responsible for guaranteeing the signing of the agreement will be the Global Research and Development Department or the local New Products area, as appropriate.
- Any technological solution that generates a differentiation of the product must be coded and documented by the Global Research and Development Department in order to maintain its confidentiality.
- During the implementation or transfer of any crown jewel from a Business Unit to another, the confidentiality of the ingredients that represent a competitive advantage must be maintained at all times, as well as the compliance of the ingredients strategies, defined by the Global Procurement and Research and Development Departments.
- The Global Tracker will be the only tool for consulting and analyzing projects to generate synergies between the Business Units in Grupo Bimbo and accelerate the transfer and launch time of technological solutions.
- No ingredient supplier will be authorized to work at Grupo Bimbo facilities, unless it is coordinated with the technical services area and has the corresponding VP's approval.
- If a technical services representative is not present when an ingredient supplier is working at a Grupo Bimbo facility, the bakery's manager will be primarily responsible for supervising the supplier's activities and controlling the information that is provided.
- The representatives of the technical services of each Business Units must compile a report of each industrial ingredient test that the New Products and Research and Development Departments carry out, in order to guarantee the confidentiality of the results obtained during the tests. Reports will only be shared with suppliers under the strict responsibility and approval from the Project leader.
- The transfer of a technological solution must be controlled and approved by the Global Research and Development Department and the corporate technical services team. Likewise, it must be documented following the protocol for industrial tests of each Business Unit, which must contain at least: industrial process conditions, ingredient category, description of the advantages with the new proven technology (e.g. cost, clean label, claim, etc.).
- Any breach to this policy, by an associate or a third party of the company, will be subject to an immediate justified termination of the contractual relationship, as well as the civil and criminal procedures available to compensate for the injuries and prejudices caused to Grupo Bimbo.

6. Responsibility/ Ownership

The Global Research and Development 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	March, 2020	Nadia Estrada Martinez	Internal Control and Risk Management Department	General revision of the content and global policies official template