

1. Purpose

Establish general guidelines to guarantee that Grupo Bimbo S.A.B. de CV, its subsidiaries and affiliates ("Grupo Bimbo" or the "Company"), and those who act on their behalf, comply with all applicable laws for crime prevention, in all businesses and relationships.

2. Scope

This policy applies to associates of any hierarchical level, including, without limitation, Board of Directors, Executives, Directors and, in general, to any associates (eventual or permanent) ("associates") that is related to negotiations and transactions of the Company, in any of the countries where it operates.

3. Definitions

Associate: Any person linked to work with Grupo Bimbo, through a determined and indeterminate time contract, regardless of whether they are unionized or administrative personnel.

"Comenta" Committee: Entity made up by the Global Vice Presidents of People, Institutional Relations, Operations, Procurement, Communication, Legal, Compliance, Security & Protection and Internal Audit Departments.

Crime: Action or omission sanctioned by legal norms applicable by the competent authority

Complaint: Verbal or written manifestation that is made before an authority for some fact with the appearance of a crime

Events with criminal appearance: Any of the following may be contemplated in local and international legislation: bribery, corruption, influence peddling, money laundering, terrorist financing, smuggling, fraud, crimes against commercial companies and/or the stock market, financial, accounting and/or tax crimes; falsification of information, computer crimes, crimes against the environment, against security and public administration or against their property and assets; against intellectual or industrial property, against public health, occupational safety, against persons and/or human rights; against competition, etc.

Crime Prevention Model (CPM): Set of actions to prevent, detect and respond to any possible crime-like event, including the monitoring of these actions.

Public servant: Any employee of a government entity belonging to the Executive, Legislative or Judiciary Powers, autonomous constitutional bodies, companies in which the State has a stake or research agencies; elected or appointed; belonging to any level of government (federal, national, state, provincial or municipal); or any political party, official of a political party or candidates for any position of popular election.

Business partners: Any person other than a public servant, especially suppliers and customers.

4. Responsibilities

"Comenta" Committee: Dictate measures for the correct execution of this policy. Approve, on a case-by-case basis, those situations that, according to the policy, require express authorization. Supervise the application of the corresponding disciplinary measures for non-compliance with the policy

Global Legal and Compliance Department ("Compliance Vice President"): Monitor compliance with the policy and execute the *Comenta* Committee's determinations.

Global Business Units Vice Presidents: Implement this policy in their Business Unit and monitor

compliance with the applicable legal provisions on crime prevention in the countries where they operate. Designate a person responsible for crime prevention and to be the link with the Global Legal and Compliance Department.

Functional Vice Presidents (Global and local): Implement this policy in their areas of responsibility and monitor compliance with the applicable legal provisions on crime prevention in the countries where they operate.

Associate: Comply with this policy.

5. General guidelines

Grupo Bimbo has zero tolerance for any action or omission that leads to the potential commission of acts that appear to be crimes and will act in accordance with the current legal framework. Therefore, the Board of Directors, the Company's General Management and its executives support this policy, take their legal responsibilities seriously and expect the same from their associates.

Therefore, the Business Unit Vice President, Functional Vice President (global or local), or their designee(s), shall implement a CPM that includes the following elements:

- Assess and mitigate the risks of crime-like events, in accordance with the following:
 - Identify and evaluate the processes and transactions (e.g. productive, logistic, commercial, financial, environmental, etc.) that entail a risk of crime-like events in the Company.
 - Design and implement controls to manage and mitigate the evaluated risks.
 - Monitor any changes or updates to the legislation of each country, focused on crime prevention and ensure that the controls implemented in internal processes are enough to fully comply with them.
- Regulatory framework compendium: Develop the necessary local procedures for crime prevention, aligned with this policy.
- Training and coaching: Train associates annually about this policy and applicable crime prevention laws, so that they know, understand and comply with it, as well as to be able to recognize operations that may be related to events with criminal appearance and to know how to proceed in such cases.

Crime and relationship with public servants

Associates who have contact with public servants during the performance of their duties must ensure that the relationships they establish with them comply with the applicable law and Grupo Bimbo's policies.

Relationship with security forces and competent authorities

When so warranted, the Company may request the intervention of security forces and/or competent authorities, if this is done in a legal and transparent manner. Therefore, authorized associates involved in this type of relationship shall:

- Consult with the Global Compliance Vice President or the *Comenta* Committee, and with the Global Department or local Corporate Affairs area.
- Respect the legislative context, laws and customs of each country.

Business partners conduct

All business partners must comply with the **FGB-EPR-03 Grupo Bimbo Supplier Code of Conduct (External Policy)**, which they are required to sign and comply with.

Complaints and violations report

Any event that could result in a violation of the policy must be reported to the *Comenta* Committee, through the "*Comenta*" reporting channel of the corresponding locality or through the following e-mail account: comenta@grupobimbo.com

If the associate is unsure whether the conduct constitutes an act with the appearance of a crime, he/she should consult the *Comenta* Committee.

Reports received will be shared only with authorized persons. Failure to report known or suspected misconduct may subject associates to sanctions, up to and including termination of employment.

Prohibition of retaliation

Retaliation against anyone who reports misconduct or participates in its investigation is prohibited. Failure to comply with this provision may result in disciplinary action against the violator, including termination of employment.

Investigation of events with criminal appearance

Any reported conduct or event with the appearance of a crime will be investigated by the *Comenta* Committee or its designee. In the event that the investigation concludes that there was an event with the appearance of a crime, the Company will take the necessary corrective actions according to the circumstances of the case and the applicable law, which may range from administrative proceedings and reprimands, to termination of the employment relationship and reporting to the competent authorities.

Prior to the determination of the corresponding sanction, the persons who have carried out the conduct to be sanctioned shall have the right to make the statements they deem appropriate.

When there is information related to an investigation of administrative misconduct or the commission of events with criminal appearance, it is prohibited to provide false information or to deliberately and unjustifiably delay the delivery thereof, or to obstruct the investigative powers of the authorities.

Non-compliance

The *Comenta* Committee shall establish disciplinary measures for non-compliance with this policy, which shall be applied by management.

Disciplinary measures imposed by the *Comenta* Committee shall be without prejudice to the corresponding criminal, administrative or civil proceedings.

Audit and monitoring

Regular monitoring activities and audits shall be conducted within Grupo Bimbo to verify compliance with this policy. These audits may be carried out by internal or external auditors and the monitoring activities by the Global Legal and Compliance Department or its designee.

The points that may be reviewed will be the implementation and monitoring of the CPM by each Business Unit or Functional Department. Associates must provide the information requested by the auditors, if such information is protected by confidentiality obligations, the information must be submitted to the *Comenta* Committee, who will determine how to provide it to the auditors.

6. Responsibility / Property

The Global Legal and Compliance Department is the assigned owner of this policy and primarily responsible for its contents, updating, monitoring of its compliance and submission for approval to the Global Internal Control and Risk Management Department, Steering Committee and Top Management.

7. Updates

The changes implemented in between versions are described below.

Revision / history revision				
Version	Revision date	Updated by	Approved by	Main changes
1				