

1. Purpose

To establish minimum guidelines to ensure that Grupo Bimbo S.A.B. de C.V. and its subsidiaries and affiliates ("Grupo Bimbo" or the "Company") and those acting on its behalf, comply with all applicable anti-money laundering laws in all the businesses and relationships that they carry out.

2. Scope

Applies to associates who work at any level of the Company, including without limitation Counselors, VPs, Directors and, in general, any associate (temporary or permanent) ("associates") related to negotiations and transactions of the Company, in any of the countries where it operates.

3. Definitions

Suspicious activities: Those of clients or third parties that are unusual, that lack a logical and/or commercial known explanation and that, therefore, could have as motive illicit behaviors.

Vulnerable activities: Those that are common among merchants and that, by their nature and characteristics, can commonly be related to money laundering. These type of activities can allow the entry of money obtained from illegal sources. For this reason, national and international laws pay special attention to them and do everything possible to prevent and detect vulnerable activities, such as:

- Those related to the practice of betting games, contests and sweepstakes.
- Sale or transfer of movable property and real estate, such as warehouses or motor vehicles.
- Transportation of land cargo.
- Property leasing.
- Savings, loan, pawn and credit operations.
- Issuance or marketing of prepaid cards and coupons.
- Those linked to investment advisors and real estate advisors.
- Those specific to each country.

Client: Any natural or legal person that celebrates acts, operations or maintains a commercial relationship, or of any other nature, with Grupo Bimbo, due to the provision of services or the goods that the Company provides.

Associates: Anyone linked to Grupo Bimbo through a fixed-term or indefinite contract.

Integrity background check (IBC): Process to obtain accurate information from natural or legal persons through the search for information, obtained legally, in public databases of international scope.

Money laundering: Process by which people, groups or entities try to hide the product of illegal activities (terrorism, drug trafficking, corruption, among others) or try to make the sources of their illegal funds appear legitimate and circulate without problem in the financial system. In general, it happens in three stages:

- **Placement:** Cash proceeding from illicit activities enters the financial system through monetary instruments, money orders or deposits in accounts of banking institutions.
- **Stratification:** It is the separation of illicit funds from their source, through a series of financial transactions.
- **Integration:** The funds are reintegrated into the economy through commercial or personal transactions that appear to be normal in order to create a perception of legitimacy.

Politically exposed persons: Individuals who perform or have performed prominent public functions, for example, heads of State or government (at the federal, state and/or municipal level), members of Congress,

judges, magistrates and ministers, members of high-ranking armed forces, senior executives of state companies and important officials of political parties, among others.

Third parties: Those persons who, without being clients of the company, celebrate acts, operations or maintain a commercial relationship, or of any other nature, with Grupo Bimbo (i.e. suppliers and contractors of the Company, among others).

4. Responsibilities

Ethics and Compliance Committee ("Ethics Committee"): Dictate measures for the correct execution of this policy and approve, case by case, those situations that according to this policy require the express authorization of the Company.

Global Legal and Compliance VP ("Compliance VP"): Monitor the overall compliance of the policy, as well as follow up and execute the Ethics Committee's determinations. Disseminate the present policy and its modifications, within Grupo Bimbo, by the corresponding means, so that all associates know it.

Compliance Champion ("Champion"): Monitor local compliance with the policy, as well as follow up and execute the determinations of the Global Legal and Compliance Department.

Organizational and Functional VP's: Implement this policy and comply with the stipulations of the internal procedures and the rest of the applicable legal provisions regarding the prevention of money laundering and assets of the countries where they operate, as well as designate a person responsible to be the link with the Global Legal and Compliance Department.

Controllers: Ensure full compliance with this policy.

5. General guidelines

Grupo Bimbo considers integrity as an essential element in the way of doing business; is committed to comply, with the highest standards, with all laws, including those related to the prevention of money laundering in each of the countries where it has activities, and will only conduct business with clients and third parties involved in legitimate commercial activities, with funds from legal sources.

Money laundering is a crime that is punishable by imprisonment and fines for natural and moral (legal) persons, and may even lead to the dissolution of the companies involved, according to the jurisdiction and applicable laws. Therefore, the Company takes its legal responsibilities very seriously and requires the same from its associates. Therefore, it is the policy of Grupo Bimbo to comply with the following guidelines:

- It is not allowed to maintain commercial relations with:
 - People with possible involvement in criminal activities, based on the information available about them.
 - People with businesses whose legitimacy of the activity or source of funds cannot be reasonably verified.
 - People who refuse to provide the information or documentation that is required.
 - Entities whose control / shareholder structure cannot be determined.
- It is prohibited to carry out any transaction that hides or conceals the source, property, location or control of funds.

The Controller, or whomever he/she designates, shall:

- a) Ensure that the following steps are completed to evaluate the most efficient way to manage and mitigate the money laundering risks faced by the Company:
 - Identify and evaluate clients, third parties and money laundering risks for the Company;
 - Design and implement controls to manage and mitigate the risks evaluated, and

- Monitor and improve the effective functioning of these controls.
- b) Consider, among others, the following key risk factors to identify, evaluate, understand and mitigate money laundering risk:
 - Country: Clients or third parties that have a link with countries, with characteristics or reputation of locations where illicit activities related to money laundering are committed, must be identified with precision to protect the Company from financial risks and damages to its reputation. These characteristics, without limitation, may be:
 - Countries subject to sanctions, embargoes or similar measures issued by the United Nations Organization or similar international organizations.
 - Countries identified as deficient in the implementation of regulations and regulations on money laundering by reliable sources such as the Financial Action Task Force ("FATF"), international authorities or other recognized evaluation bodies.
 - Countries identified by credible sources as providers of financing or support for terrorist activities.
 - Countries that grant preferential tax treatment or that do not require the publication of information related to financial operations and real beneficiaries.
 - Countries identified by reliable sources that have significant levels of corruption, drug trafficking, human trafficking or other criminal activity.
 - Client/third party: Determine the potential money laundering risks of each client/third party or category of clients/third parties is fundamental for the development of a general risk framework. The responsible party must determine if a client/third party in particular, represents a greater risk of money laundering and evaluate, in each case, if there are sufficient mitigating factors to conclude that the client/third party does not represent a high risk of money laundering.
- c) Keep in his/her records, electronic or physical copy of identification documents of his/her clients/third parties or representatives that have been subject to review and ensure that the information provided is appropriate.
 - All records and archives that support transactions and business relationships that relate to vulnerable activities of Grupo Bimbo, its customers or third parties, must be kept for the period that the relevant local legislation sets as a minimum. In absence of applicable legislation, they will have to be kept for at least 5 (five) years.
 - This retention period will be calculated from the ending of the transactions or of the business relationship.

The associates referred to in the scope of this policy must:

- a) Cooperate with the competent authority and, in addition to the reports, warnings and notifications provided by applicable legislation, notify as soon as possible to the competent authorities, any suspicion regarding the illicit origin of the funds of a client or third party, when so determined by the Global Legal and Compliance VP.
- b) Report immediately and in writing, to the Global Legal and Compliance VP, the Ethics Committee or the Legal and Compliance Department, the suspicious activities listed in this policy, which may arise in the course of commercial activity.
 The reports can also be made through "línea comenta" ("Speak Up Line" hotline) to the email account: comentar@grupobimbo.com, which is an anonymous and confidential means of communication. These reports will be shared exclusively with other authorized people by the Company who necessarily need to know.
 Suspicious activities include, among others:
 - When the legality of the operations of a client or a third party cannot be determined after the Global Legal and Compliance Department and/or the champions of each Business Unit have carried out the IBC.
 - Customers or third parties that provide false, misleading or substantially incorrect documentation and/or refuse to provide complete information.

- Customers or third parties who appear to be acting as an agent of another company or individual, but refuse or decline to provide information regarding that company or individual.
- Clients or third parties that wish to avoid, or express their concern, about the requirements to make reports or keep records.
- Payments made in cash or cash equivalents, such as money orders, traveler's checks or prepaid cards.
- The purchase of products, or a purchase of greater volume, which seems to be inconsistent with the normal order pattern of a customer, without any legitimate business reason.
- Complex business structures or payment patterns that do not reflect any real business purpose.
- Clients or third parties that request invoices that reflect inaccurate prices, goods falsely described and/or multiple invoices.
- Requests for payment through an unrelated country or an unrelated third party.
- Multiple partial payments from different people representing a single client or third party and/or multiple partial payments from different locations.
- Customers or third parties whose address is not a physical or locatable site.
- Clients or third parties that use a certain form of payment and request a refund in a different form of payment.

The Controller and/or champion must:

- a) Monitor transactions in cash or cash equivalents as a form of payment of the goods or services provided by the Company that exceed \$ 7,500 USD (seven thousand five hundred US dollars) per month, accumulated or in a single exhibition.
- b) Perform the Integrity Background Check (IBC) to customers and third parties with whom the Company has business relationships, which have any relationship with vulnerable activities or exceed \$ 7,500 USD (seven thousand five hundred dollars) monthly in cash, accumulated or in a single exhibition. Also, the Controller and/or champion must perform an IBC:
 - When establishing a business relationship for the first time or if there are substantial changes in it.
 - When making occasional transactions, such as electronic and cash payments, in transactions for gaming providers.
 - When there is a suspicion of money laundering, regardless of any exception, exemption or threshold.
 - When there are doubts about the veracity or suitability of the customer/third party identification data previously obtained.

Training and qualification

The Global Legal and Compliance Department and the champions must provide annual trainings on this policy, and the applicable anti-money laundering laws, so that the Counselors, Top Management and, in general, all the associates subject to it, know, understand and comply with the policy, to be able to recognize the operations that may be related to money laundering and to know how to proceed in such cases.

Audits and compliance control

Compliance with this policy will be monitored through a combination of periodic supervision, internal and external audits, along with the corresponding revisions provided in the applicable legislation and regulations, in the matter of money laundering.

The Global Legal and Compliance Department and/or its link with the Business Units will review cash transactions made by the Company throughout the year in search of suspicious activities and, where

appropriate, carry out the reporting, advisory, reporting or notification applicable in accordance with applicable local law.

6. Responsibility / Ownership

The Global Legal and Compliance 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

Description of changes made between versions.

Revision / History of the Revision				
Version	Date Revision	Updated By:	Approved By:	Main Changes
1				