

1. Purpose

Establish the general guidelines for software management, owned or from third parties, used in Grupo Bimbo, or any of the Grupo Bimbo subsidiaries.

2. Scope

This policy applies to all Global IT Departments, responsible for software management, owned or from third parties, used by Grupo Bimbo, S.A.B. de C.V., and/or any of its affiliates.

3. Definitions

Software administrator: Associate in charge of application management.

IT Committee: Global Departments of i) Infrastructure, ii) Information and Services, iii) Digital Transformation and Business Solutions iv) IT Governance.

Business person responsible: Functional VP or top manager, owner of the business function where the software is used.

Software: Set of programs that interact with the users through an information asset.

4. Responsibilities

IT Governance Administrator: Manage, administratively and financially, the global software providers to continue the service. Manage the installation, operation, and support of the software that supports business functions. Analyze the scanning results of the software installed in the information equipment and attend the information requirements done by internal audit.

Global Infrastructure Department and Global IT Governance Management: Approve the software acquisition for the Business Units and comply with the requirements defined in this present policy.

Global procurement teams: Execute the process of software acquisition after it is approved by the Global Infrastructure Department and Global IT Governance Management.

Head of business: Ensure the use of software complies with the contractually established terms and conditions. Ensure the software acquisition and installation is performed after prior approval of the Global Infrastructure Department and the Global IT Governance Management. Comply with the requirements of this present policy.

5. General guidelines

In order to mitigate the risk of loss or misuse of company intangible assets, Grupo Bimbo personnel must comply with the following requirements:

Software acquisition

For software acquisition, the Global IT Governance Management must comply with the following:

- Guarantee through the local procurement teams, the software acquisition is done according to the requirements defined in GB policy **FGB-IT-02 Global Policy of Development and Acquisition of Information Technology (IT) Goods & Services.**
- Ensure, together with the Global Information Security Management, the software complies with the necessary security criteria to safeguard the information of the company.

- In the case where the acquisition is perpetual, retain the information that guarantees the software has been legally acquired with the authorized developer and/or distributor.
- In the case where the acquisition is a subscription or a low demand service, retain the information that guarantees the software installed on the server or in the final user equipment, has been legally acquired with the authorized maker and/or distributor, as well as validate the subscription is current.
- Execute the software license or subscription renewal process at least 60 days before its expiration.

Software change

For any change of software and prior its execution, the IT Committee, the Global Infrastructure, Information Security, and IT Compliance Departments, must analyze the impacts to the Business Unit and inform them of those impacts, to facilitate decision making.

Third parties' software

For software provided by third parties' the software management process must comply with the following:

- The Global Infrastructure Department must define the elements to monitor the software used in the information assets.
- The business responsible that engages the software service from a third party, must ensure its use complies with the terms and conditions established in the contract with the third-party vendor.

Software developed for the company

For administration of software developed for the company, either by a third party or internally, must comply with the following:

- The Global Negotiations and Contracts Management must ensure the inclusion of contractual clauses that indicate that all software developed for the company belongs to the company, and that the third party could not use it with other companies.
- The IT responsible that develops or makes changes to the applications developed by the company, whose intellectual property belongs to the company, must notify to the Global IT Governance Management to register with the correspondent body through the Global Legal Department.
- The Global Information Security Management, together with the correspondent software administrator, must document the communication between the software developed for the company and the third party's software.

Authorized software

To ensure the use of only authorized software, all Grupo Bimbo and subsidiary IT personnel must comply with the following:

- The Global Infrastructure and Information & Services Departments must define the tools that will be included in the software catalog contained in *IT Works*.
- The Global Infrastructure Department and authorized third parties are the only groups empowered to perform the download, installation and/or uninstall the software in the information assets of the associates that were registered or unsubscribed, due to change of Business Units or functions.

Software removal or forfeiture

For software removal or forfeiture, the IT governance administrator must comply with the following:

- Together with the Global Infrastructure Department, perform a quarterly analysis to identify any unauthorized software installations, and execute the cleanup procedure, as appropriate.
- Complete a quarterly analysis to identify any software that is disused for a period greater than 90 days, and execute the cleanup procedure, as appropriate.
- In case of loss or theft of company information asset, execute the cleanup procedure of the software that was installed. Complete the cleanup procedures within 3 calendar days after the report date.

6. Responsibility / Ownership

The Global IT Departments are 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				