

1. Purpose

Establish general guidelines on corporate communication at Grupo Bimbo.

2. Scope

This policy applies to those responsible for Grupo Bimbo's corporate communication and to associates and third parties of Grupo Bimbo who, being spokespersons or not, have or may have contact with internal or external audiences on behalf of any Organization affiliated and subsidiary of Grupo Bimbo.

3. Definitions

External Audience: For purposes of this policy, all those who are not associates of Grupo Bimbo.

Internal Audience: All Grupo Bimbo associates, both from its subsidiaries and its affiliates, as well as personnel under an outsourced services contract.

Grupo Bimbo Culture: For the purposes of this policy, only the objectives, mission, beliefs, and key behaviors are considered.

Global Communication Strategy: The annual plan formed by the decisions and tactical actions programmed by the Global Communications Area to communicate to the internal and external audiences of Grupo Bimbo matters related to the business objectives.

Reputational Impact: Any action or saying that could jeopardize the perception of the company and its brands before the social environment and that could compromise the value of this.

Sensitive Information: Confidential data or information owned by Grupo Bimbo including, without limitation, the following:

- Financial results or projections that have not been publicly announced
- Non-public numbers of GB, its Organizations, and affiliates (e.g. brands, products, number of plants, associates, etc.)
- Acquisitions, investments, divestments, partnerships, or strategic alliances
- The wage information of employees
- Non-public information on shareholders
- Legal proceedings
- Crises
- Speculations on income, future products, and prices
- Commercial routes
- Personal data of associates and third parties

Sensitive Information: It is all documentation, inventions, ideas, concepts, models, manufacturing models, prototypes, manufacturing designs and plans, methods of use, process designs, operating conditions, equipment design, technical information, "know-how," industrial secrets, economic processes, market reports, studies, plans, programs, drawings, photographs, videos, investigations, analyses, compilations, price information, terms and conditions concerning equipment, sales, licenses and engineering services, everything related to finance, business and market plans, legal issues, supplier lists, lead lists, clients, business prospects, business opportunities, business records, personal assignments, contracts, assets of Grupo Bimbo and its affiliates and subsidiaries.

Restricted Information: Documents containing commercial, sensitive personal, financial, investigations, and records information, among others, for the exclusive access of a specific department of Grupo Bimbo.

Media or communication channels: Instruments or platforms for transmitting or receiving messages, either traditional (e.g. cinema, radio, television, press, etc.) or digital (e.g. websites, microsites, emails, social networks, screens, etc.).

Narrative: Creative method, through which the set of ideas, values, and relationships of the company's culture is explained.

Communication Pieces: Communication inputs that are necessary for the transmission of print, digital, visual, audible, or audiovisual messages, whose distribution can be officially or corporately.

Communication Plans: Strategic actions and communication tactics by theme.

Third Parties: Persons or entities that establish any contractual relationship with Grupo Bimbo (e.g. suppliers, communication and design agencies, business partners, associations, consultants, etc.)

Communications Toolkit: Set of materials, documents, and tools for their application in communication, helpful for issuing a specific message.

Spokesperson: An associate who may speak on behalf of Grupo Bimbo in internal, external forums or before the media, with the prior authorization of the Global Communication Area in the case of global issues and of the Executive Management of the Organization or area responsible for Communication in the Organization, country, affiliate or subsidiary of Grupo Bimbo in the case of local issues.

4. Responsibilities

Executive/Spokesperson: Comply with the guidelines of this policy.

Global Communication Area: To be guardians of Grupo Bimbo's reputation inside and outside the company. Define the global communication strategy of Grupo Bimbo. Execute the communication plans of the company's General Management. Provide the strategic framework for global communication and strategically organize the corporate communication of Grupo Bimbo and its Organizations. Define global messages narrative, and develop the corresponding communication pieces and toolkits for delivering the message to the respective audiences. Monitor traditional and digital media for Grupo Bimbo, its shareholders, and CEO. Participate in the Crisis Committee when necessary. Manage the company's corporate communication channels. Notify and validate to the Investor Relations Area the company's financial information to be published. **Validate and authorize media interviews.**

Grupo Bimbo Steering Committee and Organizational Managers: Ensure compliance and adherence to the provisions of this policy.

Communication Officers in the Organizations: Comply with the guidelines of this policy. Execute the local communication strategy aligned with the global communication strategy, maintaining alignment and reporting with the Global Communications Area. Monitor traditional and digital media in your area of responsibility and participate in local Crisis Committees. Provide information that will be communicated to internal and external audiences on projects, programs, or topics of your Organization to the Global Communications Area. Comply with the global editorial calendar and defined criteria for communications. Report results and KPIs in the periods defined by the Global Communication Area.

Global Legal Area: Provide, at the request of communication managers, legal advice on the publication or use of communication materials, both internally and externally.

Global Area of Administration and Finance, through the Investor Relations Area: Confirm what sensitive information may be made public to the Global Communications Area.

Global Operations Area: Provide, at the request of those responsible for communication, advice on industrial secrecy, information on production centers, technology, operation, and use of the image for proper communication.

5. General Guidelines

The only areas empowered to direct the relationship with external audiences through the media are the Global Communication Area on global scope issues and the General Organizational Areas and Communication Managers on local scope issues, and shall therefore:

Communication aimed to external audiences

- Authorize messages for both traditional and digital media.
- Approve the disclosure of official company information to external audiences or third parties, especially if it is confidential or sensitive information.
- Allow requests for sensitive information or interviews by external audiences.
- Authorize the publication of open letters, communiqués, and articles of interest on behalf of the company.
- License and regulate internal and external spokespersons, including those of digital media, based on their reputational impact and the scope of the messages they communicate.
- Approve the participation of executives or third parties before external hearings to present information on Grupo Bimbo.
- **Notify the employee or spokesperson to be interviewed they may not disclose confidential, restricted, and sensitive information about the company.**
- Certify messages issued by third parties to external audiences through print or digital channels.
- Authorize the generation of institutional websites, as well as the general structure and sitemap for Grupo Bimbo or its Organizations, countries, affiliates, and subsidiaries, as appropriate.
- Monitor compliance with the "Brand Book" of Grupo Bimbo and its subsidiaries in all the above-mentioned communications.

Communication aimed to internal audiences

- Disseminate global communication in Grupo Bimbo's official two languages (English and Spanish), except those countries subject to specific regulations.
- Generate programs, plans, and internal communication campaigns that support the company's strategic plan, making sure to deliver messages in the local language.
- Continuously disseminate Grupo Bimbo's overall strategy and culture to all its associates.
- Locally report the results of Grupo Bimbo and its organizations.
- Align with the communication strategy of the Global Communications Area, and request approval of high-impact organizational projects.
- Manage the use of local internal media in compliance with the **GGB-001 Code of Ethics**.
- Comply with the guidelines for global communication tools and channels, such as email accounts and internal social networks. See **FGB-CO-01 Annex I**.
- Enable feedback media to listen to internal audiences.
- Share best communication practices to improve the process.
- Monitor the proper use of Grupo Bimbo's logos and its subsidiaries in mail firms and internal media.
- Monitor compliance with the "Brand Book" of Grupo Bimbo and its subsidiaries in all the above-mentioned communications.

Grupo Bimbo executives and spokespeople must comply with the following guidelines:

External Media

- When faced with the unexpected approach of the press or digital media reporters, every executive or spokesperson should indicate: *"I am not authorized to answer your concern/question."* They must ask for contact details and forward the request to the Global Communication Area, or the General Management of the Organization, or the person responsible for communication in their local organization. **GGB-017 Global Policy on the Use of Social Media and Digital Media**.
- Interviews with external media should:
 - Be performed only by official company spokespeople.
 - Be focused on the company and its scope.
 - Avoid executive or administrative profiles.
 - Be aligned with this policy and the **GGB-017 Global Policy on the Use of Social Media and Digital Media** in terms of briefing books and key messages.
 - Before granting an interview in a personal capacity, focused on the person or the company, they must notify and obtain prior authorization from the Global Communications Area. In the case of local issues, approval is also required from the General Management of the Organization or the area responsible for Communication in the Organization, country, affiliate, or subsidiary of Grupo Bimbo.
 - For examples of issues not to be discussed in interviews, see **FGB-CO-01 Annex II Global Corporate Communications Policy**

Sensitive Information

- Sharing confidential information with any third party or external person is not allowed.
- In extraordinary cases, due to legal, state, or business strategy requirements, where some confidential information must be made public, this information must be:
 - Reported in writing to the Global Communication Directorate.
 - Have the approval of the Global Investor Relations Area and Grupo Bimbo General Management, as the case may be.

Organizational Changes

- Are not allowed to be communicated externally:
 - Appointments and promotions of associates.
 - Organizational changes of any kind associated with Grupo Bimbo and any of its subsidiaries.
 - If, for exceptional reasons, it is necessary to make known any of these changes, the applicant must contact the Global Communication Area to evaluate the request together. See the example of these communications in **FGB-CO-01 Annex II Global Corporate Communications Policy**

Interviews and forums with business partners

Participation in interviews and forums with business partners (e.g. Microsoft, Amazon, Service Now) is allowed as long as:

- Information is aligned with this policy and with the **GGB-017 017 Global Policy on the Use of Social Media and Digital Media**.
- Communication favors both parties and contributes to Grupo Bimbo's reputation.
- The stories made are evaluated and authorized by the different areas involved, including the Global Communication Area.

7. Responsibility / Ownership

The Global Area of Corporate Communication is the assigned owner of this policy and is primarily responsible for its content, updating, and monitoring of compliance, as well as the submission for approval to the Global Area for Internal Control and Risk Management, the Steering Committee, and the General Management.

8. Updates

Changes made between versions are described.

Revision / history of the review				
Version	Review date	Updated by	Approved by	Main changes
1	December 2017	Fernanda Calvillo	Global Communication Area	
2	November 17 2021	Karina Fogel	Global Communication Area	Update of the name of the Functional Management owner: from Global Area of Corporate Affairs to Global Communication Area. Internal communication guidelines are added.
3	July 2022	Maria Elena Ramirez	Global Communication Area	Internal and external communication functions are integrated under the supervision and sponsorship of a single Global Area of Corporate Communication.
4	April 2023	Maria Elena Ramirez	Global Communication Area	Added in the communication section aimed at external audiences and guidelines on what to do and not do for communication strategies.