

Global Policy of IT Business Partners Management

Global IT Departments

FGB-IT-12

1. Purpose

Establish the general guidelines for the relationship with IT providers of Grupo Bimbo.

2. Scope

The present policy applies to the associates of the Global IT Departments and any other from Grupo Bimbo, S.A.B. de C.V., and/or any of its affiliates, that have a relationship with IT business partners.

3. **Definitions**

Confidentiality agreement: Unilateral or mutual contract, through which, one or both parts are compromised to not share with third party's information defined as confidential.

Confidentiality: The security principle that requires only the data must be accessed by authorized people.

Monitoring: Process through its observed, gathered, and studied the data behavior of a computer system, through the previously defined thresholds to alert a possible event.

Third parties and/or providers: External working in the facilities or have access to the information assets of Grupo Bimbo.

4. Responsibilities

Global IT Governance Management: Perform, together with the requesting associate of the Good or IT service, the impact evaluation that represents the IT business partners' change. Approve the hiring of the IT providers.

Global IT Risks and Compliance Management: Guarantee the update and compliance of the established measures in this policy.

Global Negotiations and Contracts Management: Participate in the negotiation of the IT service to be hired. Ensure that the goods or services contracts are carried out according to what is established in the present policy.

Global Tax and Legal Departments: Validate and authorize the clause content included in the goods or IT services contracts.

5. General guidelines

In order to ensure the transparency, responsibility, continuity, service level, and value delivery of the products and IT services, from third parties to Grupo Bimbo, must comply with the following:

Agreements

The associates that have contact with an IT third party must:

- Validate with the Global Negotiations and Contracts Management the classification of information that will be given to the provider, as well as ensure that a confidentiality agreement is signed, prior to giving them the information, access, or quote services with a third party.
- Ensure that the scope of the service is aligned to the needs of the business and the design required.

At the same time, the Global Negotiations and Contracts Management must:

Apply the provider filtering process and inform the results to the requesting associate.

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- Ensure that the goods or IT services contracts include the no divulgation clauses and the corresponding legal requirements and country's regulatory, such as; data protection, intellectual property rights, money laundering, trademark protection, compliance, penalty, and deductions, among others.
- Send, for its validation and authorization, the contracts to Tax and Legal Departments or local areas.

Monitoring and revision

The global administrators of the IT service levels must:

- Define the guideline for monitoring and evaluating the service levels established between the company and the IT third parties.
- Define, identify, and authorize the indicators that show the figure about the expected quantitative value of the service hired. No other associate could authorize the service levels of the IT providers.
- Measure the provider capacity to comply with the terms of the contracted Good or service, prior to the payment execution and, in its case, report the results to the third party and the Global IT Governance Management for decision making about future hiring.
- Request quarterly to the associates to have the relationship with an IT third party, the monitoring of compliance, capacity and performance of the hired services.
- Ensure the IT third parties have procedures and response protocols for incidents or problems restoration, to keep the continuity, utility, warranty of the IT services, according to the service levels and contractual obligations.

Information security

To keep the information security, must comply with the following:

- The Global Information Security Management, together with the Global Risks and Compliance Management, must define the security requirements that IT third parties must comply with prior to giving access to the information and considering the information classification levels defined by the company.
- Meanwhile, the Global Negotiations and Contracts Management must ensure contractually, prior to the formalization of the relationship with third parties, that these align their operations to the IT incidents management established by the company.

6. Responsibility / Ownership

The Global IT Departments 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				

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