

## 1. Purpose

Establish the general guidelines for the standardization and development of web pages of Grupo Bimbo through Content Management System ("CMS").

## 2. Scope

This policy applies to associates from the **Global Marketing Department, Business Technology and any other area** that require a primary website or a microsite in any Business Unit of Grupo Bimbo.

## 3. Definitions

**Brand manager:** Associate from the Marketing area focused on support and development of a Brand.

**Brief / Briefing:** Clear and concise document that guides a person or group of people to carry out a project or determined task, detailing the full idea of what the goal is, how it will be done, timeframe and context.

**Content Management System (CMS):** Application that is used to manage content (image, text, video or any digital element the website may contain), allowing multiple associates to create, edit and publish. Content in a CMS is typically stored in a database and displayed in a presentation layer based on a set of templates like a website.

**Cookies:** Data package that a web browser stores automatically on a user's computer when they visit a webpage.

**Framework contract:** Agreement that regulates the relation between two or more parties, for the constant acquisition of goods or services, and that documents specific businesses through annexes.

**Google tag manager:** Tool that simplifies the label or code fragments management for monitoring and measuring a web page.

**Hard code:** Practice not recommended in the development of software that consists of embedding data and / or content directly in the source code of the program, instead of obtaining that data from an external source, such as configuration files, content manager, line parameters of commands or using relative routes.

**Microsite ("Weblet"):** Individual web page or group of pages that extend or expand the functionality of the primary web page. The home page of a microsite almost always has its own web address, which, in some cases, is in a distinct domain other than the primary web page.

**Notice of privacy:** Physical, electronic or any other format document, created by the Global Legal and Compliance Department or by anyone who is designated, to notify the type of treatment the owner's personal information will receive and obtain consent for its use.

**Secure hosting provider:** The provider that hosts and guarantees the security of the web pages of Grupo and supports the local teams in the migration of an unsecured page to one that is secure.

**Secure Platform:** Defined **infrastructure** for the Global Marketing and **Business Technology** Departments where web pages can be hosted. The defined platforms are Millennium and AWS.

**Web developer:** Agency or individual responsible for programming the source code of a web page.

## 4. Responsibilities

**Global Functional Department:** Authorize web page domain creation, evaluate performance and influx to current web pages and determine the continuity or closing of a web page.

**Global Marketing Department:** Support the local teams in the creation of their webpage in terms of writing the right brief and ensuring best practices for web pages. This department also supervises the briefing and definition of the agency that will create the webpage for local teams and brands.

**Global Business Technology (BT) Department:** Establish the technical security guidelines for developing and hosting of the web pages, define the secure hosting providers and communicate both to the interested. Have a framework contract with the secure hosting providers, validated by Legal. Give support to the developer and the interested area to validate the output to production tasks. Ensure that secure hosting provider complies with the following: guarantee the web pages security that are inside their infrastructure through the installation and security certificate update; perform monthly vulnerability reports and recurring security patch application; support the migration of the unsecured web page to one with the required levels through static and Dynamic vulnerability scans.

**Global Compliance Department:** Establish the guidelines, related to data protection, applicable to the web page publication. Provide to the interested area, the notice of privacy and/or any other required document, translated to required language, for application on web pages.

**Global Legal Department:** Validate the requested domain availability and manage the purchase of it, when applicable; coordinate the domain register, manage the renovation or cancel it with prior authorization of the Global Functional Department. On interested areas request: validate contracts and service orders, as well as verify content on the sites that refer to the use of brands': logos, images and/or videos, including promotions.

**Local team or functional area:** Comply with the established guidelines in the present policy and associated procedures; manage development Budget, hosting, implementation, maintenance and closing of each requested web page. Request to the Global Compliance Department, the current version of the notice of privacy and/or data protection that corresponds to the country, as well as maintaining the site content updated.

**Brand Lead Country:** Define and provide the generic structure of the brand web page.

## **5. General Guidelines**

The development of webpages must comply with the Grupo Bimbo policy:

### **Opening**

- The interested area must fill out a briefing format, where they establish the purpose, expected benefits in terms of influx and influence, indicators, objectives and functions that the web page will have.
- With this template, the **BT**, Legal and Marketing Departments must evaluate the viability of the web page (in terms of strategy and security) and continuity according to the defined domain renovation terms for the Global Legal Department.
- The interested area must assume the associated costs of developing and hosting the web page.
- The Global Marketing, **BT** and **Legal** Departments will define together, the final domain name, including extensions to the web page (v. g. ".com", ".com.br", ".com.mx", etc.).
- Any request to register a domain for a web page must be previously authorized by the corresponding Global Functional Department and by the Global Marketing, Communications, Legal and **BT** Departments.

- The cost associated with domain registration and renewal, if the latter applies, will be absorbed by the legal entity owner of the rights (e.g. brands), being the Global **BT** Department in charge of managing the payment of the provider's bill.
- Every web page that is developed or redesigned in Grupo Bimbo must be **hosted** in a secure platform.
- The interested area will hire an agency to develop the web page, through a validated framework contract by legal, ensuring that it complies with the established technical requirements.

## Renewals

The Global Legal Department should:

- Renew the register of the domain names that comply with, at least, one of the following conditions:
  - It is in use.
  - Has content or redirects to another company's website.
  - Has potential or plans to use it the next year.
  - It is a brand considered as "global" by the Global Marketing Department and has a territorial extension in a country with direct presence of the company.
- In case of domain with phonetic and spelling variations or those with territorial extension in countries with no direct presence of Grupo Bimbo, request the approval to the requesting area for renewal.

## Development

The development of the web pages must be with the following guidelines:

### Technical requirements

- Global Functional Department (e.g. brands) must approve the generic structure of the web page and the interested area must adapt it to the country.
- The development of the web pages must be under the security and development guidelines provided by the Global **BT** Department. These guidelines are located in <https://gbconnect.sharepoint.com/sites/C2Msite/SitePages/Musts.aspx>.
- The use of hard code must be avoided in the development of web pages and ensure that any content can be edited through a content manager.
- Every web page and microsites must be hosted with the secure hosting provider, including promotions.
- The secure hosting provider must be selected from a list authorized by the Global **BT** Department.
- The development and publication of web pages of Grupo Bimbo in social networks such as Facebook, Twitter, Instagram, etc. is prohibited.
- A responsible must be assigned as user to "CMS" of the web page.

### Personal data protection

- All web pages must have a current notice of privacy of personal information and in the corresponding language. This should be approved by the Global Legal and Compliance Department, according to the **FGB-CP-01 Global Policy for the Protection of Personal Information**.
- The web pages related to promotions must have the notice of "terms and conditions" approved by the Global Legal Department, as well as a specific notice of privacy, according to the characteristics of the promotion and/or the country in which it is published and applied.
- The requesting functional Department must ensure the pages that save sensitive personal data (e.g. financial data or patrimonial of a credit card, debit card, etc.), have a mechanism that guarantees obtaining the explicit consent of the user.
- Every configuration of the webpage should comply with the **FGB-IT-11 Global Encryption Policy** and **FGB-IT-20 Global Policy of IT Services Continuity**.

- The webpages should have the cookies preferences required by the applicable country or region legislations. To comply with the regulations that govern the cookies, it is necessary to:
  - Inform the user about the type of cookies that will be gathered, explaining in simple and clear language about this and its purpose.
  - Receive the user's consent about the use of cookies.
  - Document and store the consent received by the users inside the webpage.
  - Allow the users to access the webpage, even if they denied the use of such cookies. In this case, it will be notified the user the functionalities and services that could be disabled.
  - Facilitate to the users the withdrawal of their consent, in case they decide it.
- The requesting area must have a signed contract with the developer or agency about the personal data treatment, validated by legal area.

### Content

- The requesting area must get the approval by Legal in regards to the content in the web pages, referred to the use of brands: logos, images and/or videos, this includes promotions and its terms.
- All web pages must have a *Google Tag Manager* module available to access the analytic data.
- In case that Global **BT** Department or the secure hosting provider, detects security threats the interested area must request the web developer timely perform the required corrections to mitigate the threat.
- The Functional Responsible Department must evaluate the influx and influence of the web page, according to the expected benefits, in case this does not reach the estimated results, must determine and document the continuity or closing of the web page.
- The use of freely distributed web fonts must be prioritized or, failing that, it must be certain that the web use license of the font or fonts in use is available.

### Maintenance

The requesting area must maintain the site content, and any update, referred to use of brands: logos, images and/or videos, including promotions and its terms, must be approved by the legal area.

### Closing

- In case of promotion, once the validity of these are finished, the Global Legal Department will cancel the domain.
- All domain renewal or closing request must be previously authorized by the correspondent Global Functional Department.
- The Global **BT**, Legal and Marketing Departments, together, may decide to keep the domain register, even when this have no content, for protection reasons and strategy or to ensure future use.
- The Global **BT** Department will manage the web page removal from the secure platform.
- All Brand web pages of Grupo Bimbo that are not under a secure platform, must be migrated to one to have access to the CMS.

### Disputes with third parties

In case of detecting a website to be potentially fraudulent or infringing, the functional area that detects it should notify the Global Legal Department and BT (Cybersecurity).

At the same time, the Global Legal Department should:

- Validate the reported website.
- In case the website is not legitimate, execute the established protocol on the **FGB-MK-07 Appendix I** of this policy with the Global Marketing Department and its local teams.

### 6. Reference

- [FGB-CP-01 Global Policy for the Protection of Personal Information](#)
- [FGB-IT-11 Global Encryption Policy](#)
- [FGB-IT-20 Global Policy of IT Services Continuity](#)

## 7. Appendix

- [FGB-MK-07 Appendix I](#)

## 8. Responsibility / Ownership

The Global Marketing Department is the assigned owner of this policy and main responsible for its content, update, monitoring of its compliance, and the submission for approval to the Global Internal Control and Risk Management Department, the Steering Committee and CEO.

## 9. Updates

The changes implemented in between version are described below:

Revision / History of the revision				
Version	Revision Date	Updated by	Approved by	Main Changes
1				
2	February 28, 2021	Carolina Casa Berdeja y Franco Lira Peralta	Alberto Levy	<ul style="list-style-type: none"> <li>• The definitions of notice of privacy, brief/briefing and cookies were added.</li> <li>• The responsibility of the Global Marketing Department was modified.</li> <li>• The renewal, protection of personal information, use of cookies and disputes with parties' guidelines were added.</li> <li>• The annex of the protocol to deal with cases of apocryphal webpages is added.</li> </ul>