

1. Purpose

Establish the general guidelines on respecting the human rights of our associates, interest groups, people in our value chain and the communities in which we operate, in congruence with Grupo Bimbo's culture and in accordance with the applicable laws in each country, international law and other global instruments of Human Rights, as well as the commitments acquired with the alignment to the United Nations Global Compact.

2. Scope

This policy applies to all associates, shareholders and all people, regardless of their position or level, who collaborate with Grupo Bimbo, including and without limitation, VP's, Directors, Managers and, in general, any temporary or permanent associate (as jointly identified as "associate" or "associates"), as well as individuals. It is also applicable to any deal, contract or negotiation between any of the Business Units, affiliates and subsidiaries of Grupo Bimbo, in their different geographies and functions, as well as in contractual relationships with third parties.

3. Definitions

Child labor: It's a violation of Human Rights and refers to the work of underage boys and girls (according to the legislation of each country that establishes the minimum age for work), which is detrimental to their development, as it is dangerous or harmful, and intervenes with their schooling and exposes them to danger or physical or psychological harm.

Dignified or decent work: Refers to equal access to opportunities of freely chosen or accepted productive employment, with a fair income that allows associates to enjoy a decent standard of living, with job security and social protection, that meets local and international standards of occupational health and safety, which provides better prospects for development and social and economic integration.

Discrimination: Any distinction, exclusion or restriction that is not objective, rational or proportional, and that, by action or omission, with or without intention, has the purpose or effect of obstructing, restricting, preventing, impairing or nullifying the recognition, enjoyment or exercise of Human Rights, based on race, color, sex, religion, political opinion, disability, national, ethnic or social origin, nationality, age, sexual orientation, gender identity and expression, language, social, economic, and migratory condition, or health, marital status, or any other contrary to human dignity.

Due diligence: Refers to the continuous process of evaluation and management of human rights risks, through systems, controls and processes, with the aim of preventing and identifying, mitigating and repairing the negative impacts (potential and real) that these could generate.

Forced labor: Any work or service required of a person under threat of a penalty and for which said person does not volunteer and is subjected to the use of violence or intimidation, manipulation or retention of identity documents or, is subjected to threats to report to the immigration authorities to be deported, in the case of being outside their country of origin.

Global pact: It is an international initiative of the United Nations Organization that encourages companies to implement the *Ten Universally Accepted Principles of the UN Global Compact*, including those on human rights, sustainable development, labor standards, the environment and the fight against corruption, in the activities and business strategy of companies.

Golden Rule: Principle under which everyone should be treated with Respect, Fairness, Trust and Affection.

Human rights: These are the fundamental freedoms and prerogatives protected by national and

international law, inherent to all people for the mere fact of being people. They include the right to equality and non-discrimination, the right to work, labor rights and trade union freedoms, the right to life, to personal integrity, to health, to a healthy environment, to the protection of personal data, to legal security, due process, a life free of violence, freedom of expression, among others recognized by International Human Rights Law.

Human trafficking: Refers to the recruitment, transport, transfer, or reception of people, for the purpose of exploitation, resorting to threats or use of force, or other forms of coercion, such as kidnapping, fraud, deception, abuse of power, situation of vulnerability, concession or receipt of payments or benefits.

International human rights law: It is the international legal order or set of international standards that protect Human Rights worldwide. It is made up of international treaties, protocols and conventions celebrated, signed and ratified by the United States, customary international law, peremptory norms of general international law and judicial decisions issued by international and regional courts (see section “**6. Reference**” for the treaties referenced).

People or groups in vulnerable situations: Refers to people who, historically or in a systemic or structural way, have been excluded, marginalized or discriminated against, due to belonging to a certain group or due to their personal characteristics. Therefore, they receive special legal protection in the matter of Human Rights: women, people with disabilities, girls, boys and adolescents, elderly people, indigenous people and peoples, migrants and refugees, people of sexual diversity, among others.

Risks or negative impacts for Human Rights: Possible negative effects / consequences of the company's activities on Human Rights. They can be potential or actual.

Workplace violence: A set of unacceptable behaviors and practices, or the threat of such behaviors, whether they are manifested once or repeatedly, between people who share employment or have a similar relationship, which are intended and that cause or may cause , physical, psychological, sexual or economic harm, including gender-based violence and harassment. It occurs during work, in relation to the job or as a result of it.

4. Responsibilities

Chief Executive Officer of Grupo Bimbo: Promote this policy, fostering leadership and providing direction to senior executives, as well as promoting the implementation of internal control mechanisms (due diligence) to ensure compliance.

Global People Department: Define, update, communicate and monitor compliance with this policy. Evaluate and guarantee that the policies that govern the processes of the People department are accessible to all associates and that they are not discriminatory in their design and implementation. Define internal collaboration programs to identify, prevent, mitigate and repair risks and negative impacts on Human Rights. Design the due diligence strategy. Carry out the annual report on Human Rights within Grupo Bimbo and provide the corresponding information for the preparation of the Annual Report. Report quarterly to the Chief Executive Officer on the review of Human Rights within the company.

Global Institutional Relations Department: Define the measurement indicators for Human Rights actions, aligned with methodologies, evaluators and international requirements. Disseminate the mediation mechanisms, including the Speak up Line / Ethics Line, to report breaches or deviations to our Code of Ethics and the Code of Conduct for suppliers.

Global Legal Department: Verify that the agreements entered with suppliers and clients have clauses related to the prevention of risks and negative impacts on Human Rights.

Business Unit Presidents and Functional VPs: Are mainly responsible for implementing and managing

the mechanisms to respect and protect Human Rights in all Organizations and in the commercial relationships that are established, as well as for assigning the necessary resources for their fulfillment.

Global Procurement Department: Carry out due diligence on projects and commercial alliances with suppliers, to evaluate the Human Rights context of the activity and identify possible affected parties. Define collaboration programs with the supply chain to identify, prevent, mitigate and repair risks and negative impacts on Human Rights. Annually evaluate the Human Rights policy and verify that it does not contain biases, nor does it discriminate directly or indirectly. Report quarterly to the General Directorate on the review of the Human Rights situation in the supply chain.

Global Diversity and Inclusion Department: Manage, lead and ensure diversity and inclusion in Grupo Bimbo, including the promotion and respect for Human Rights in general. Monitor compliance with inclusive behaviors within Grupo Bimbo and in the value chain.

People Departments, Areas and Leaders: Implement processes to avoid negative impacts on Human Rights, in the application of Grupo Bimbo policies, throughout the associate's working life. Promote a culture of respect, under the Golden Rule, in all Business Units or departments under its charge, as well as to manage the resources necessary for its compliance.

Global Sales Department: Carry out due diligence on projects and commercial alliances with clients, to assess the context of Human Rights in the activity and identify possible affected parties, as well as identify, prevent, mitigate and repair risks and negative impacts on Human Rights. Annually evaluate this policy and verify that it does not contain biases, nor does it discriminate directly or indirectly. Report quarterly to the Chief Executive Officer, on the review of the situation of Human Rights and alliances to protect them, with the main clients.

Associates: Comply with the provisions of this policy, in the **GGB-001 Grupo Bimbo Code of Ethics**, the **GGB-004 Global Integrity Policy**, the **GGB-009 Global Policy on Diversity and Inclusion**, the **GGB-015 Global Safety Policy**, the **GGB-018 Global Policy on the Prevention of Harassment and Discrimination** and **FGB-HR-01 Global Wellness Policy**. Point out, through the corresponding channels, deviations from this policy and all those relating to the dignity of the person.

5. General guidelines

From its origins, Grupo Bimbo has always worked under the principle of its Golden Rule. Today, it reinforces this principle through its commitment to respect, promote and make Human Rights practical in its value chain, in alignment with our Beliefs, Code of Ethics, Policies, International Human Rights Law, the Global Compact and the Sustainable Development Goals.

At Grupo Bimbo we value the person, therefore, every associate, regardless of their level of responsibility and involvement in the processes, must:

- Coexist, always lead and collaborate under the principle of the Golden Rule and at all levels.
- Comply with the guidelines established in the related policies (see section “6. Reference”).
- Encourage inclusion, respect and value diversity. Favor a healthy coexistence, free from workplace violence and discrimination, under the universal values protected by Human Rights, equal opportunities, human dignity and high-performance collaboration for all.
- Ensure safe, free, equal and legal working conditions, as well as report any deviation from them, through the designated institutional channels.
- Ensure that the best practices in Human Rights are applied in Grupo Bimbo and are extended to the value chain and stakeholders (associates, suppliers, partners, clients, consumers and the communities in which we operate).
- Report any situation that is contrary to or may violate Human Rights, through the formal complaint mechanisms of Grupo Bimbo, such as *Speak up Line / Ethics Line*.
- Promote Human Rights, through culture short, that allow them to be better understood and open the

conversation for their application in all aspects of the company.

On its part, Grupo Bimbo works daily to train, sensitize and incorporate mechanisms that ensure:

- A dignified job for all its associates, in compliance with their labor and union rights, in a safe environment, free from workplace violence, discrimination and psychosocial risks.
- The non-use of child labor, forced labor and human trafficking in its direct operations, as well as the adoption of mechanisms to prevent its use by its suppliers, clients and business partners.
- The correct operation of due diligence mechanisms for the correct management of Human Rights risks in the value chain.
- The prevention, attention, mitigation and repair of negative impacts on Human Rights.
- The trust of stakeholders, through timely and transparent reports, on the management of Human Rights.
- The existence of complaint mechanisms (Speak up Line / Ethics Line) for stakeholders, that are accessible, reliable, legitimate, predictable, equitable, transparent and compatible with Human Rights.
- The constant renewal of the commitment to respect, protect, guarantee and promote Human Rights in its operations and, as far as possible, with its suppliers and business partners.
- Inclusion and non-discrimination in access, permanence and development at work, as well as in our relationship with clients, consumers and communities where we operate, through equitable and inclusive processes, communications and opportunities.
- The safety, physical integrity and well-being of its associates.

In the event of any breach of this policy, it must be reported through "Speak up Line / Ethics Line" (Grupo Bimbo's mediation mechanism) and the pertinent mitigation, reparation and sanction measures will be applied, in accordance with Grupo Bimbo's policies and applicable legislation.

6. Reference

The Grupo Bimbo policies related to human rights are:

- **GGB-004 Global Integrity Policy**
- **GGB-009 Global Diversity and Inclusion Policy**
- **GGB-015 Global Safety Policy**
- **GGB-018 Global Policy on the Prevention of Harassment and Discrimination**
- **FGB-HR-01 Global Wellness Policy**

The main treaties related to human rights are:

- International Covenant on Civil and Political Rights
- International Convention on the Elimination of All Forms of Racial Discrimination
- Convention on the Elimination of all Forms of Discrimination Against Women
- Convention on the Rights of Persons with Disabilities
- Declaration on Fundamental Principles and Rights at Work of the International Labor Organization (ILO)
- The eight fundamental covenants of the ILO (num. 87, 98, 29, 105, 138, 182, 100 y 111)
- United Nations Guiding Principles on Business and Human Rights
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families
- Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, which complements the United Nations Convention against Transnational Organized Crime.

7. Responsibility/Ownership

The Global People Department is the assigned owner of this document and main responsible for its content, update and submission for approval to the Global Internal Control and Risk Management Department,

Steering Committee and CEO.

8. 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				