



Grupo Bimbo S.A.B. de C.V. and its subsidiaries (“Grupo Bimbo”) are a group that has thrived since its foundation in 1945, seeking business relationships with suppliers based on mutual trust, respect, fairness, honesty, integrity and continuous improvement, committed to ethical and sustainable principles.

To “build a sustainable, highly productive and deeply humane company” we need to involve and commit our global supply chain. Grupo Bimbo considers suppliers (“Suppliers”), all of our partners who provide us with ingredients, packaging, finished products, indirect materials and services, as well as our contract manufacturers who we entrust to produce our products on our behalf and our suppliers’ suppliers.

We expect Suppliers to fully comply with this Code of Conduct, all applicable laws, legal requirements, best practices and international standards where they operate, to improve sustainable practices and ensure long term value to our consumers and product excellence.

When there is a concern, our practice is to work with the Supplier, we may be able to help identify possible improvements. However, when an issue is not corrected or a Supplier is unwilling to engage, we reserve the right to end our relationship, regardless of contractual obligations. Where alignment with the Supplier Code of Conduct could lead to a conflict with or a violation of applicable laws or regulations, the supplier will notify Grupo Bimbo of the situation and explain how it intends to operate in a responsible manner.

To ensure a clear understanding of the principles and policies that govern the relationship and ensure their implementation, we have developed this Grupo Bimbo Supplier Code of Conduct.

## **Sustainable Sourcing**

Grupo Bimbo has also published certain global policies that apply to specific ingredients such as palm oil. Grupo Bimbo reserves the right to request additional third-party certifications of ingredients, commodities or services as they become available and are commercially viable.

The scope of this Code of Conduct establishes Grupo Bimbo’s guidelines and policies for social, economic and environmental practices.

## **1. Social & Ethics**

### **Ethical Behavior - A Shared Commitment**

To remain sustainable and achieve consumer preference, Suppliers and their employees shall establish and always maintain the highest ethical standards including:

- **Business Integrity.** Suppliers shall adopt and implement a "zero" tolerance policy prohibiting any kind of bribery<sup>1</sup>, corruption, extortion and fraud. All transactions must be conducted transparently and properly recorded.
- **Conflicts of Interest.** Suppliers naturally engage in trade relations with other companies, including Grupo Bimbo’s competitors. Any situation that results in, or could result in, a conflict of interest must be avoided and reported immediately to Grupo Bimbo. Suppliers should self-verify annually and declare that no conflicts of interest exist, in order to maintain its relationship with Grupo Bimbo.
- **Confidentiality.** Suppliers shall not reveal any confidential information provided by Grupo Bimbo relating to their business relationship to: (a) their representatives, except when it relates specifically to

<sup>1</sup> For the purposes of this Code of Conduct it means giving, offering, requesting or receiving (or any attempt to give, offer, request or receive) anything of value for the purpose of directing the behavior of someone to obtain or retain a benefit.



providing goods and services to Grupo Bimbo or on its behalf; or (b) to persons outside the supplier's organization. Suppliers must comply with applicable security and privacy laws, regulations and retention requirements, and ensure that they have appropriate legal, technical and security controls in place to protect Grupo Bimbo's confidential information. Confidential information means all non-public Grupo Bimbo data, including but not limited to: business plans, pricing strategies, marketing plans, personal information, trade secrets and intellectual property. Suppliers may not outsource, disclose, share, or use this information outside the requirements defined in the agreement executed with Grupo Bimbo. Suppliers should never use Grupo Bimbo's confidential information for their own benefit or that of other persons. Similarly, Grupo Bimbo shall not request confidential information about its competitors from Suppliers.

### **No Bribery and Corruption**

Suppliers shall operate legally and in compliance with all applicable laws and regulations as well as international agreements, including anti-corruption laws.

Given that anti-corruption laws typically prohibit direct or indirect payments, the manipulation of government officials<sup>2</sup> and third parties; any improper payment, gift or other valuables offered or provided by a supplier can be considered as provided by Grupo Bimbo. Consequently, we prohibit any such behavior by any of our current or prospective Suppliers. Given that bribery and corruption are considered punitive crimes, Grupo Bimbo takes its legal responsibility seriously in this regard and expects the same from its Suppliers.

### **Prohibited Acts**

**Offering or Receiving Improper Benefits:** With regards to corruption, Grupo Bimbo does not distinguish between government officials and individuals. Bribery and corruption are not tolerated regardless of those involved. Suppliers that do business with or act on behalf of Grupo Bimbo, should not give, offer, promise, request, accept or receive directly or through third parties, anything of value to or from any Government Official, private entity, individual, or a family member thereof, with the intent to persuade them or be persuaded to exploit their position for any undue advantage.

### **Gifts, Food, Travel, and Entertainment**

Suppliers must not offer, give, request or receive any gifts, meals, travel or entertainment, from or to, any person on behalf of Grupo Bimbo or any of Grupo Bimbo's associates.

Grupo Bimbo has in place a gift, meals, travel and entertainment policy, which all Suppliers must abide to, that is based upon lean principles and relationships with our Suppliers, prohibiting them: (i) giving us or receiving from us travel and/or entertainment (except as expressly and strictly authorized on a case by case basis by Grupo Bimbo's Ethics and Compliance Committee), (ii) giving us or receiving from us gifts (other than promotional gifts with no commercial value) and (iii) giving us or receiving from us meals (other than business related meals, in customary places, sticking to sobriety, austerity, coherence and rationality principles).

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<sup>2</sup> For the purposes of this Code of Conduct it includes any officer or employee of a body of government, whether elected or appointed, acting in that capacity, representing all levels of government, federal or national, state or provincial, or municipal; but not limited to their legislative bodies, ministries or departments, judicial bodies, state-owned entities or investigative agencies, as well as any political party, an official of a political party or candidate for any elected office.



### **Fraud and Other Criminal Behaviors**

Suppliers shall not violate any criminal statute or perform any illegal acts, including fraud and theft, while maintaining a business relationship with, or acting on behalf of, Grupo Bimbo.

### **Labor Standard**

Suppliers shall respect the human rights of all workers and treat them with respect and dignity; including fixed, temporary, migrant, student or contract workers.

- **No Discrimination and Anti-Harassment.** When hiring anyone, Suppliers must not discriminate against any person regardless of race, color, religion, gender, age, nationality, disability, sexual orientation, gender identity, pregnancy, marital status, political affiliation, union membership or any other personal characteristic protected by law. This policy applies to all aspects of employment, including recruitment, promotion, demotion, transfer, layoff and termination, compensation, education, training and other working conditions.
- **Humane Treatment.** Suppliers shall not engage in harsh and inhumane treatment of workers, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse, nor there the threat of any such treatment.
- **Freely Chosen Employment.** Suppliers shall not use any forced, bonded or indentured labor, involuntary prison labor, slavery, or trafficked persons. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation. All work must be voluntary, and workers will be free to leave work at any time or terminate their employment. Suppliers are responsible for knowing and complying with any applicable law and regulation. Suppliers shall commit to all legal compliance for foreign and immigrant workers without withholding any identity documents, or wages, outside any legal and fully understood contractual agreement. All basic hiring terms are to be fully understood by all workers and provided in their native language. All workers have the right to leave the workplace after their shifts.
- **No Child Labor.** Grupo Bimbo does not accept child labor and suppliers shall not employ persons under the age of 15, unless local law is set at 14, as defined by ILO Convention 138. Workers under the age of 18 shall not perform hazardous work. Suppliers shall have age verification procedures in place and shall apply remediation measures if child labor is detected. Legitimate workplace apprenticeships are permitted.
- **Freedom of Association.** Suppliers shall respect the rights of workers to organize collectively and to do so independently, without interference, within the legal framework of the communities where Grupo Bimbo operates. In communities where free and independent collective bargaining is constrained, Grupo Bimbo shall respect alternative organization channels.
- **Wages and Benefits.** Compensation paid to workers shall comply with all labor legislation applicable to wages, including minimum wage provisions, working hours, overtime and benefits law.
- **Working Hours.** Workweeks, including overtime, shall not exceed the maximum number of hours permitted by applicable laws and regulations. Overtime shall always be voluntary, and may be agreed through a legitimate collective bargaining agreement or written consent with all associates informed at the time of hiring. Overtime shall be compensated at the applicable mandated or agreed premium rate. Associates shall have at least one day rest in every seven day period.



## **2. Economic and Safety**

### **Food Quality and Safety**

Grupo Bimbo is committed to providing its customers and society with reliable and safe products. Therefore, Grupo Bimbo expects Suppliers to always consider and manage food safety and quality in their own operations and in the supply chain. Suppliers must deliver products and services that meet the safety and quality requirements established by Grupo Bimbo, in addition to those established by applicable laws and regulations where they operate and Grupo Bimbo reserves the right to request additional quality and food safety certifications from the supplier at any time. Suppliers must provide Grupo Bimbo with any critical information involving any products or services provided by the supplier that can affect the quality or safety of Grupo Bimbo's products.

### **Traceability**

Grupo Bimbo reserves the right to request full traceability of all ingredients and materials from Suppliers in order to ascertain their origin and determine sustainability risks and applicability of existing and emerging regulations and standards.

### **Health and Safety**

Suppliers shall ensure safe and healthy working conditions, using appropriate controls, safety procedures, preventive maintenance and safety equipment. All these practices must comply with applicable laws.

The health and well-being of associates as well as consumers is a priority of everyone who works at Grupo Bimbo. All Suppliers' workers shall be provided with regular and recorded health and safety training, as required by law in a language that is understood by the corresponding workers.

Suppliers shall adopt emergency action plans covering fire, spills and other evacuation concerns for all sites supplying products or services to Grupo Bimbo, which include emergency management teams, communication plans with updated contact lists and at least one annual drill. Suppliers should also ensure the provision of fire safety standards, required training for first aid and emergency care and the handling and disposal of hazardous materials.

All supplier workplaces shall be properly ventilated for hot environments and where chemicals and solvents are used. Workplaces shall also be sufficiently heated for cold environments, taking into consideration any risks related to food safety. Adequate lighting and noise protection will be afforded in the workplace. Suppliers shall maintain scheduled and recorded equipment maintenance to ensure proper industrial hygiene.

### **Adequate Record Keeping and Accounting**

Suppliers shall retain and maintain accounts and records with a reasonable level of detail and that adequately reflect the business conducted with Grupo Bimbo. Suppliers shall also retain and maintain accounting control systems to ensure that their records and anti-corruption objectives are achieved.

## **3. Environment**

Grupo Bimbo recognizes that sustainability is a key part of its function as a company. Negative (or potentially negative) effects on the environment shall be reduced or eliminated as much as possible in its operations, while safeguarding the safety and health of the workforce and taking into consideration product safety. It is the obligation of Suppliers to know and comply with all applicable environmental laws, regulations and international agreements and develop plans and best practices to promote environmental sustainability. Grupo Bimbo encourages the implementation of creative ideas for waste management and reduction, recycling and re-uses programs.



Suppliers shall responsibly manage all aspects of its business to meet or exceed recognized environmental standards and legal requirements and strive for continual improvement.

Suppliers shall properly manage energy use, transportation, greenhouse gases, emissions to air, ozone depleting substances, water use, wastewater and effluents, waste, hazardous and potentially hazardous substances, contaminated land and groundwater, land use and biodiversity, and community nuisances as determined through a site-by-site risk approach. Suppliers shall have an Environmental Management Plan (“EMP”) that covers all sites providing products or services to Grupo Bimbo. This EMP should include environmental risk assessments, objectives and targets, operational controls, controlled documentation, scheduled audits and inspections, and annual management reviews. Workers shall be encouraged to propose improvements to Suppliers’ sustainability performance.

### **Intellectual Property and Reputation**

Our brand names are a key asset of our business. Maintaining the reputation of our brands is essential to our ability to attract and retain retailers, consumers and associates; and it is critical to our future success. Suppliers must avoid any act or behavior that could result (or reasonably be expected to result) in affecting the reputation of our brands or any other of our intellectual property rights.

Supplier must assure that the services or products provided to Grupo Bimbo according with its business relationship are not infringing any third party’s intellectual property rights.

### **Implementation, Administration and Enforcement**

Just as we expect our associates to uphold and commit to the principles set forth in this Code, we similarly expect that Suppliers will do the same. We encourage Suppliers to acknowledge, respect and adopt the Grupo Bimbo Supplier Code of Conduct or similar and equal standards as follows:

- **Communication.** All Suppliers will be requested to review the Grupo Bimbo Supplier Code of Conduct and to return a written acknowledgement. The requirements of the Code must be communicated to all Suppliers’ employees.
- **Self-assessment Questionnaire as it is requested.** Grupo Bimbo reserves the right to request a risk assessment or a self-assessment. Grupo Bimbo shall prioritize the implementation of the Grupo Bimbo Supplier Code of Conduct to critical Suppliers, with corresponding actions and resources.
- **Contractual Terms and Conditions.** Any contract with Grupo Bimbo shall be in writing and make reference to this Supplier Code of Conduct. In addition, contracts and declarations shall include adequate safeguards against corruption.
- **Subcontractors.** Suppliers shall not outsource others to act on behalf of Grupo Bimbo, without prior written permission. The written authorization is independent of the supplier’s obligation to suitably conduct quality due diligence and ongoing verification of the subcontractor to ensure that it complies with this Supplier Code of Conduct. Suppliers shall submit to Grupo Bimbo, upon request, the result of this due diligence and / or verification, including all reports or documents generated during that process. Suppliers shall obtain written acknowledgement from the subcontractor, of compliance with this Code.
- **Audit Requirements.** Grupo Bimbo may conduct audits at the offices or sites of the supplier or request it from a third party, to verify compliance to this Code of Conduct and any other applicable laws. These audits may be conducted without prior notice. Suppliers shall make the best efforts to fulfill all audit requests. The costs of the audits might initially be covered by Grupo Bimbo. However, if audit findings



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show any breach of this Code of Conduct or any applicable law, then subsequent audit costs, including to review and implement corrective actions, will be borne by the supplier. Grupo Bimbo reserves the right to take additional actions as necessary, including termination of any contract or business relationship with the supplier.

- **Training and Compliance.** Grupo Bimbo encourages Suppliers to implement or maintain a compliance program and appropriate training to detect and prevent any violation of the obligations set forth in this Code of Conduct.
- **Reporting Violations and complaints.** Any violation of this Code of Conduct should be reported to Grupo Bimbo's Ethics and Compliance Committee or to Grupo Bimbo's Legal Department in a timely fashion. Suppliers shall communicate anonymous and confidential mechanisms for their employees to report any violations directly to Grupo Bimbo. These complaints must be made via online reporting, which is confidential, to [comenta@grupobimbo.com](mailto:comenta@grupobimbo.com)



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**Acknowledgement of Grupo Bimbo Supplier Code of Conduct**

I am an authorized legal representative of ..... [name of the supplier] (including its subsidiaries, parent corporation (s), affiliates and related entities) and hereby acknowledge and fully agree to abide by the policies and principles of "Grupo Bimbo Supplier Code of Conduct" and ensure that the employees, officers, directors, agents, representatives of..... are aware of and abide by such policies and principles in the process of preparing and submitting bids and proposals for Grupo Bimbo, for provision of goods and services to Grupo Bimbo, and during the performance of all agreements entered into with Grupo Bimbo for such purposes.

Authorized Signatory Name (printed): \_\_\_\_\_

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

GB Vendor ID: \_\_\_\_\_ Date: \_\_\_\_\_