



## **1. Purpose**

Establish the main guidelines to curb the practice of bribery in all its forms, reinforcing the environment of trust, integrity, legality, ethics and transparency at Bimbo Brazil. This Policy has for the purpose of identifying the obligation regarding compliance with anti-bribery laws, providing the definition of what bribery is, identify responsibilities regarding bribery issues, as well as actions and measures to be adopted in case of bribery, in addition to serving as a guide for the correct way to behave in the social and commercial environment with regard to the anti-bribery management system of the Bimbo Brazil.

## **2. Alcance**

This policy applies to all shareholders and to all persons, regardless of their title or level, who work for the company, including without limitation: directors, officers, managers and, in general, any temporary or permanent collaborator (hereinafter identified as "collaborator" or collaborators."), as well as business partners. It therefore applies to all collaborators and business partners, reaching all Bimbo Brazil units and functions.

## **3. Definitions**

**Bribery:** offer, promise, donation, acceptance or solicitation of an undue advantage of any amount (which can be financial - money - or non-financial - good, service or facility) directly or indirectly, and regardless of location, or any attempt to engage in such conduct in violation of the laws local and international applicable, as an incentive or reward for a person (from the initiative public or private) that is acting or failing to act in relation to the performance of its obligations, for their own benefit or that of anyone else.

**Bribery may serve to direct someone's conduct for the following purposes:** I) to obtain or retain a business opportunity, benefit, or advantage; II) to motivate a person to refrain from practicing an act in connection with his or her duties or those of another, or III) abusing his actual or perceived influence. All the above items are independent of the acceptance or receipt of the thing of value or result obtained.

**Anti-bribery Management System:** guided by ABNT NBR ISO 37001: 2017, a standard that was developed to include a range of measures that represent globally recognized practices that an organization must implement to help prevent, detect and respond to bribery.

**Collaborator:** any person with an employment relationship with Grupo Bimbo under a specific contract or indefinite, regardless of whether they are unionized, outsourced, operational or administrative.

**Business partners:** external party, with which Bimbo Brazil has, or plans to establish, some form of business relationship (clients, suppliers, intermediary agents, service providers service, third parties, unions, associations, commercial representatives, sponsorship beneficiaries and donations).

**Public Agent:** All natural persons entrusted with the exercise of some state function, regardless of the legal relationship, which may be by appointment, hiring, designation, summons or any form of investiture or bond. Whether this function is temporary or permanent and with or without remuneration. Equivalent to a public official who holds a position, job, or function in a parastatal entity, and who works for a contracted or convened service provider company for carrying out activities typical of Public Administration.

**Public Entity:** any entity owned (totally or partially) by the State, whether governed by public or private law, existing in the form of a state entity, autarchy, foundation, company public, mixed-capital company or autonomous social service.



**Association:** legal entity governed by private law resulting from the legal gathering of people who are organized for non-economic purposes. Defends the interests of a group that found in the union of efforts to best solution for certain problems.

**Inspection Agencies for Industrial Activities:** such agencies are understood to be any inspection entities of the spheres: Federal, State and Municipal and that carry out activity of supervision with regard to Production, Quality Control and the Environment, for example: Councils Engineering or Chemistry Regional Offices, Consumer Protection Police Stations, Institutes of Criminalistics, Consumer Protection Agencies, National Health Surveillance Agency, State or Municipal Health Surveillance, Brazilian Institute of the Environment, State Environmental Foundations, State Department of Environment, Environmental Patrols, Environmental Police Stations, National Institute of Metrology and Industrial Quality, State Institutes of Metrology and others.

**Social investment committee:** it is a Grupo Bimbo organ, composed of the appointed President, Chairman of the Board of Directors, advisors, and a Technical Secretary (Global Director of Institutional Relations).

**Ethics and Compliance Committee:** it is the internal organ created by Bimbo Brazil responsible for the evaluation and resolution of topics within the scope of Compliance.

**Gifts:** is any object offered in promotional campaigns by companies that may or may not contain the brand, logo, or company logo, such as, but not limited to pen, pencil, notebook, diary, calendar, keychain also called institutional gift. This is a worthless item commercial, whose objective is to generate remembrance, to make a thank you or to advertise the brand.

**Present:** is anything, benefit, or advantage, to which a monetary value can be attributed, or no, and that is given or received because of a commercial or institutional relationship and through which the receiver does not have to pay its respective market value and that it is not characterized as gift.

**Something of Value** includes any type of benefit, for example: cash, in-kind contributions, products, cash equivalents (gift cards, etc.), loans, presents, prizes, food and drinks, travel, entertainment (arts and sporting events), political contributions, donations (Institutional or charitable), offers of employment, promises of future employment, any kind of concession in a contract, product or service, and the ability to directly purchase shares in a company related to the Company. It may also include, but is not limited to, event sponsorship, scholarships, favorable conditions for the purchase of products or services.

**Entertainment:** is any action, event or activity, including travel, with the purpose of entertaining, may be public or private and involve sending invitations to theater, shows, sporting events, among others.

**Hospitality:** relates to the ability to receive visitors or customers in a pleasant way, generating comfort, allowing the person to feel at ease and enjoy quality services.

**Contributions:** are benefits that are not classified as sponsorship or donation. It is a way to support (financially or otherwise) the operation of a non-profit entity or association.

**Donation:** is any contribution (financial or not) to third parties, when there is no benefit in exchange (counterpart). Donation is a help for social responsibility purposes or human needs activities, for example: social actions (such as research, education), charity, philanthropy, among others.

**Sponsorship:** any contribution (financial or otherwise) to third parties, in exchange for some benefit (counterpart). Counterparts can be, for example, brand exposure, insertion of material promotional material in the portfolio of participants of an event, assignment of a space to receive clients, among others.



**Conflict of Interest:** Exists when, directly or indirectly, the interests of the collaborator or third party are or, in some circumstances, may be in opposition, interfere, compete or be influenced by the interests of the company, for a specific situation (e.g. economic interests, participation in any company, blood relationship or political relationship or any other type relationship, such as courtship, cronyism, etc.)

**Logo:** is the written part, which contains the brand name in a stylized way.

**Logobrand:** is the design, symbol or icon that graphically represents the brand.

**Brand:** is the junction of the stylized written part (logo) and the symbol / design / icon that represents the brand (logo).

**Comments:** tool open to the internal and external public to capture denouncements, consultations and reports, by phone (0800-892-3255) or e-mail: [comenta@grupobimbo.com](mailto:comenta@grupobimbo.com).

#### **4. Responsibilities**

**Legal/Compliance Area:** comply with and enforce the guidelines of this Policy through training and continuous monitoring to improve the anti-bribery system and keep this document updated, in addition to solving doubts regarding the interpretation of this Policy. The Legal Department is also responsible for conducting the process of issuing powers of attorney for collaborators and business partners with need to represent Bimbo Brazil within the scope of a formal process, accompany the visit/inspection of an Agent Public, together with the responsible area and receive all documents resulting from contact/meeting with public agents.

**Ethics and Compliance Committee:** evaluate cases of violation of the Code of Ethics, complaints received, internal rules and resolve on the necessary actions in relation to topics related to Compliance.

**Senior Management:** ensure that the Anti-Bribery Management System is established, implemented, maintained and reviewed to address the organization's bribery risks, as well as making available adequate and appropriate resources for the correct and effective operation of the Anti-Bribery Management System.

**Social Investment Committee:** define the issues and partnerships to be supported by the Group, such as: promotion of physical activity, environmental conservation, promotion of education, development community and the rule of law. Approve the budget "donations – social impact" of the Organizations, in the last quarter of the year immediately preceding the one in which it is approved, based on the results of the business of each Organization.

**Collaborators:** must act in accordance with the points mentioned in this Policy, in order to act in a integrity and not to practice acts of bribery, refusing gifts, presents, hospitality or any another way that aims to unduly benefit it, avoiding situations that may generate a conflict of interest and/or harm the company's business.

**Immediate Manager:** must accompany the team, solve doubts and contact the area Legal/Compliance, if necessary.

**Asset Security and Logistics Supervisor:** maintain reception/entrance collaborators of the Factory Plants (Asset Security) and the Sales Centers (Logistics Supervisor), oriented on the correct receipt of correspondence and Public Agents; Check the functional identification that confers powers to exercise the activity of the Public Agent, before authorizing his entry into the premises of Bimbo Brazil; Direct the Public Agent to the responsible area as per determination described in the official document presented and in accordance with the table of Persons Responsible for Reception and Follow-up of Public Agents defined in this Policy.



**Area responsible for interaction with the Public Agent:** document and report the interaction with the Public Agent by email to the Immediate Superior and the Legal/Compliance Department; Act before the Public Agent with integrity, adopting a transparent and responsible behavior, respecting all applicable national and international laws, as well as all Policies, Procedures, guidelines and guidelines from Bimbo Brazil; Avoid controversial topics of a political or religious nature before an Agent Public among others that may result in unpleasant situations; Activate when necessary and in cases of doubt the Legal/Compliance Department, Corporate Affairs, Report practices of violation of this Policy to the reporting channel Comenta; Communicate the Immediate Manager and the Department Legal/Compliance, the receipt of communication, notification, letter and/or subpoenas; perform when necessary payments in favor of the competent public body according to the guidelines established in this Policy.

**Corporate Affairs:** to perform institutional interactions with Public Agents; to document through and report in electronic media sent to the Legal/Compliance area the institutional Public Agents; clarify doubts when called in relation to the interpretation related to the related to the theme of institutional interactions with Public Agents; evaluate when contacted the pertinence (or not) of accompanying a visit of a Public Agent.

**Area managers:** assess the need for a power of attorney for collaborators and business partners who represent Bimbo Brazil within the scope of a formal process.

## **5. General Aspects**

Considering that Grupo Bimbo has zero tolerance when it comes to lack of integrity, acts of corruption, bribery and criminal offenses, and is firmly committed to doing business in an honest and ethical, Bimbo Brazil establishes through the Senior Management, its commitment according to the guidelines:

- Prohibit the practice of bribery (pay or receive), as well as any practice that leads to this understanding, such as offering undue advantage or benefit, both in the private and public sectors.
- Comply with the Code of Ethics and the Global Integrity Policy.
- Act in compliance with applicable anti-bribery laws.
- Encourage concerns raised in good faith to be reported via the reporting channel (Comment), without fear of reprisals.
- Ensuring full authority and independence of the Compliance area to deal with any matters related to bribery.
- Ensure that any failure to comply with this Policy will be subject to the application of measures disciplinary measures, such as a warning, restriction of incentive programs, suspension or dismissal.
- Comply with all requirements of the Anti-Bribery Management System, such as: Policies, audits, critical analysis, controls, procedures, action plan, training, among others.
- Continually improve the Anti-Bribery Management System.

### **A. Bribery and Corruption – Prohibited Activities**

When it comes to corruption, the Company does not distinguish between public and private servants. The bribe and corruption are not tolerated regardless of the condition, position, or position of those involved. The collaborators must not request, accept, or attempt to carry out acts that may be characterized as lack of integrity, acts of corruption, bribery, and the commission of crimes.

## **B. Promotional Gifts, Presents and hospitality**

Bimbo Brazil does not allow its collaborators to offer or receive, on its behalf, presents, benefits and hospitality of public agents and business partners in general, nor to their family members or third parties linked to them, or any other situation that may generate a conflict of interest, influence decisions, or encourage business that is not in the interest of the company.

### **Basic principles**

- Offering/receiving gifts, presents and hospitality from/to public agents is not allowed, or their relatives or friends, or third parties linked to them, nor financed by Public Entity.
- No benefit can be granted, or received, to obtain an undue advantage.
- No benefit can generate a negative perception that may affect the image of the company and/or of its collaborators.
- When considering the possibility of granting benefits, the concept of Thing of Value should be considered, therefore, many benefits may not be described as gifts, presents, or hospitality, and may have high value for the beneficiary, creating a conflicting relationship.
- The concession of benefits to third parties can only occur in the form of gifts; the current legislation needs to be fully met (i.e., concession must be allowed, thresholds set must be respected, taxes must be collected, etc.).
- The benefit must be accounted for in the system in an appropriate accounting account and in the tool, TRACE gifts and its content must faithfully represent reality.
- It's not allowed any concession or receipt of undue advantages, direct or indirectly, to any person or organization. Either through collaborators or partners of business.
- Likewise, no type of Conflict of Interest can be generated between collaborators and the company when offering or receiving benefits.

**Note:** whenever there is an alert signal, the Compliance area must be consulted. They are examples of warning signs:

- If there is a suspicion that the benefit in question could be decisive for obtaining a deal, of a favor, an offer or an unfair favor to the company, cannot be accepted in no hypothesis; if the transparency of the act itself raises any concern (for example: the act in question would result in embarrassment or some negative effect on the company and its collaborators, if it is published in the media or otherwise made public).

### **Gifts**

The purpose of offering and receiving gifts is to generate a memory, thank you or advertise of a brand, and cannot be received or offered with the intention of favoring or expecting to retribution. It is understood that the offer and receipt of gifts in small quantities, with an individualized, and without commercial value, as defined in item 3, is acceptable and not dependent on prior Compliance authorization. Bimbo Brazil may carry out marketing actions in which there are gifts developed for the dissemination of products and/or brands. These can be used in events and activations for clients, influencers, press, media, consumers, or internal marketing.



## **Presents**

The company does not authorize the offer and receipt of presents from public agents and business partners in general, nor to their family members or third parties linked to them. Giving and receiving presents on commemorative dates or special events (example: Christmas, Secretary's Day, birthdays, etc.) is also not allowed.

In case of impossibility of immediate refusal (direct delivery without prior notice/accomplished fact) the presents must be returned as soon as possible. If it is impossible to return, eventual present may be donated to charitable entities, provided that with prior and express authorization from Legal/Compliance area.

## **Hospitality/Entertainment or event – relationship with business partners**

Bimbo Brazil considers invitations to events or entertainment to be a form of presente, therefore reason, does not allow the collaborator to receive or offer an invitation for private purposes and entertainment.

The offer and receipt of courtesy invitations to fairs, exhibitions, lectures, workshops, or the like, related to promoting, demonstrating, or explaining the company's products and services, as well as events of a strictly cultural and technical nature (for example, but not limited to, lectures on innovations legal/regulatory) will be considered events with strictly professional purposes and will not require prior approval from Compliance.

No invitation may cover the payment of hospitality expenses, such as accommodation or airline ticket, as well as meals, as the offer and receipt of these are prohibited. Invitations to entertainment that do not meet the above requirements must be declined and in case of impossibility of immediate refusal (direct delivery without prior notice/ fait accompli) the invitations must be returned as soon as possible. If it is impossible to return, eventual invitation may be raffled among collaborators, provided that with prior and express authorization from the area Legal/Compliance. When in doubt about the possibility of receiving or offering an entertainment invitation, Compliance must be consulted.

### **C. Meals**

The company understands that, depending on local laws and customs, inviting, or being invited to meals is considered a legal and common activity in the business world, however, its practice excessive or inadequate performance, may damage the reputation of Bimbo Brazil and the collaborator involved. The offer and receipt of meals must comply with the rules below:

- Business meals must be taken during office hours, payment being prohibited the third party's meal by the collaborator or from this to the third party.
- Meals cannot contain alcoholic beverages.
- Extending invitations to third parties (spouse, family, friends, etc.) is prohibited.

This policy does not cancel or replace **PBB-FI-01. Procedure for Corporate Travel**, found separately to this Policy.

### **D. Relationship with Public Agent**

The collaborator must not offer, grant, promise, receive or accept gifts, presents, invitations for events or entertainment, benefits, and hospitality to/from the public official or his or her relatives or friends, or third parties linked to them, nor funded by a Public Entity.





E. Donations, contributions, and sponsorships

**Basic principles**

Bimbo Brazil understands as legitimate the support to Non-Governmental Organizations (NGOs), Institutions teaching institutions and other non-profit organizations, provided they are duly recognized and in situations and well-defined contexts. Bimbo Brazil does not condone illegal activities and will make donations, contributions, or sponsorships after verifying the nature and history of the organizations, in addition to verifying the alignment of these activities with its nature.

**General rules**

Any donations or sponsorships will only be allowed if they are legal, transparent, deductible from taxation, when applicable, and justifiable, at any time, as to their reason and destination. It's forbidden make donations, sponsorships, and contributions on behalf of the company to:

- Political parties, candidates for public office or political campaigns.
- Any public agent or entity, except in cases previously and expressly approved by the Global Compliance Director after assessing its relevance.
- Any natural person.
- Religious institutions, sects, or ethnic groups.
- Entities or intermediaries that use deposits in private accounts.
- Legal Entities and individuals requesting payment through bank accounts located in tax heavens.
- Any other institution that represents any risk to the reputation of Bimbo Brazil.

In addition, it is everyone's duty to comply with the following basic principles:

- No benefit can be granted or received to obtain any undue advantage.
- Current legislation needs to be fully complied with (allowing the concession, respecting the established limits, whenever applicable, with the payment of taxes, etc.).
- Bonuses cannot be considered in the benefit category, as they are linked to a business relationship.
- The benefit must be accounted for in the appropriate accounting system and account, and its content represents faithfully reality.
- No negative perception can be generated that may affect the image of the company or of its collaborators.

All sponsorship, donation or contribution processes must be formalized through a document (contract, sponsorship agreement or similar) which must contain at least the following information:

- Completion of the Donation Form (according to Annex I).



- Clauses related to ethics, compliance with legislation and protection of the company's image.
- Proof of materiality (invoice or receipt) demonstrating payment and description of the item.
- Evidence proving receipt of the donation, for example: photos containing the Bimbo logo.
- Bank account, name of the bank and name of the favored organization, if it is not a donation in the form of product.

## Sponsorships

Sponsorship aims to make the relationship legal and adequate to the compensation offered by the event promoter. For this reason, it must be documented: its purpose, what is the counterpart, form and terms of payment and the materiality of the consideration. Bimbo Brazil does not sponsor events and projects that are associated with political parties, candidates, religious acts, games of chance, acts of transgression or restriction, or any other act that may be characterized as a lack of integrity.

## Donations

All donations made by Bimbo Brazil must be previously and expressly approved by email by Compliance Officer and after by the General Director. Donations are allowed:

**Charitable causes:** donations to charitable causes should only be made to charitable institutions charities that are registered under applicable law as legitimate philanthropies for serve humanitarian interests, public utility and/or support cultural and educational institutions.

Requests must be carefully reviewed, with the aim of verifying that the donation will not provide personal benefit to any Public Agent or to any person who has a direct or indirect relationship with this and whether the institution is registered under applicable law. It should also be checked whether the donation will not bring any undue advantage. Donations to charitable causes can be characterized in the following ways:

- **Economic donations:** these are projects that support the promotion of physical activity, conservation of the environment and the promotion of education in the local community. Will only be made in currency location based on supporting documentation.
- **Good neighbor:** support given to communities neighboring factories or sales centers, located within a 5km radius of these.

The Social Investment Committee will annually authorize a budget per work center, depending on of your size. This budget should be used on projects that benefit the community only in terms of well-being, physical activity, safety, or the environment.

Projects must be linked to volunteering campaigns to encourage the participation of our collaborators in the company's causes. Volunteering should only be carried out outside normal hours and the invitation to participate can be extended to family and friends.

- **Merchandise donations:** Bimbo Brazil may grant merchandise donations only to non-profit associations.

These products must have at least 3 days of validity and comply with the legislation. Donated goods cannot be sold under any circumstances.





### **Donations to unions**

Donations made to unions (labor or collaborators, according to Brazilian legislation) or controlled entity by a trade union must necessarily comply with the requirements and limits established by the applicable legislation.

Any collaborators or business partners who maintain or have maintained any type of affiliation with union, were members of union or union-controlled entity formal representatives of the participating company, must refrain from involvement in the decision-making process regarding this donation.

### **Contributions**

Participation in Associations or Class Entities: membership in an Association or Class Entity must be voluntary and based on transparent, objective, and non-discriminatory criteria. In some cases, the criteria for membership, exclusion and expulsion of members may raise competition concerns if such facts negatively interfere with the ability of a given company to compete in the market.

Payments of all contributions must be made with the same rigor and materiality must be documentary evidence, it being important that the nature of the entity's objectives and activities is aligned with the values of Bimbo Brazil.

Contributions of a personal nature: Bimbo Brazil does not prohibit or influence activities of a personal nature of your collaborators. However, collaborators must not link their contributions and/or activities personal to the company in any way, such as volunteer work, participation in events, must not be made with uniforms, t-shirts, cars, and other means that have the Bimbo Brazil brand or of your products.

Documentation for cases of exception: whenever there is an exception to the rules regarding Donations, Contributions and Sponsorships, Compliance is responsible for verifying that the conditions established for these activities are being attended to. In addition, the requesting area must verify if there is any risk additional, such as:

- Check if the entity is in fact "non-profit".
- Whether the transaction may cause any negative appearance.
- If public agents are involved.
- Whether there is any political party affiliation, government connection, etc.

Documents and records: the proper records must be kept by the respective persons in charge, to possible consultation or subsequent control, such as:

- Invoices.
- Records of your analysis of compliance with rules and principles.
- Signed contract, purchase order or requisition where applicable.
- Materiality – Accounting record.
- Other documents that have been used for analysis and/or decision making.



F. Interaction with Public Agents

**Basic principles – guidelines for interacting with Public Agents**

Interactions with Public Agents can happen in different ways, through inspections in Bimbo Brazil units, audiences, when the company is represented in processes of obtaining and renewal of licenses and authorizations, receipt of notifications, letters, and subpoenas in the units or by electronic means or institutional relationships.

Bimbo Brazil expects and demands from its collaborators, business partners and other parties to related matters that apply in its interactions with Public Agents the guidelines set forth in this Policy and other guidelines of the Company, always conducting business with integrity, ethics, and transparency. Any undue influence practiced by collaborators or representatives of Bimbo Brazil on Public Agents is vehemently prohibited. Bimbo Brazil does not tolerate any illegal practice in conducting its business.

All collaborators and business partners acting on behalf of Bimbo Brazil are prohibited from receive, offer, pay, promise, make, authorize, or provide, directly or indirectly, any undue advantage, whether through gifts, presents, donations, hospitality, money, payments facilitation or any other form, to any person, whether a Public Agent or not, to influence or reward any official action or decision of such person on behalf of the company.

Bimbo Brazil prohibits facilitation payments, understood as offering any amounts, or promises of other advantages for the personal benefit of a Public Official. To avoid undue requests and minimize constraints, all collaborators and business partners must strictly follow the legislation, comply with internal procedures, among them, the guidelines presented in this Policy and always act proactively to comply with internal schedules and meet the normal deadlines stipulated by the competent public bodies. If undue advantages, payments, or presents are requested by a Public Agent, the collaborator or business partner who act on behalf of Bimbo Brazil have the duty to deny the request and immediately report it to their Manager Immediate and Comenta.

Every Collaborator or representative of Bimbo Brazil must, whenever possible, be accompanied by at least more than one representative of the company whenever meeting with Public Agents and parties related issues, for support in conducting the theme. It is not recommended to take companions or people not related to Bimbo Brazil's business to meetings with the Government.

Bimbo Brazil fully respects the independence and impartiality of Public Agents in the exercise of its functions, repudiating any type of abuse or illegality in the conduct of its business. This respectful behavior is a prerequisite for any professional and ethical dialogue.

To the interactions of a technical nature (Ex.: protocols with technical entities for renewing/obtaining Environmental License or obtaining authorization for research, negotiation of tax benefits) must be handled directly by the responsible technical areas, such as Industrial, Legal, Tax/Fiscal, Management People, Environment and Controllershship Management. All documents resulting from the contact/meeting with public agents, must be sent to the Legal/Compliance area, by e-mail: [compliance.bb@grupobimbo.com](mailto:compliance.bb@grupobimbo.com)

**How to act in interactions with Public Agents**

When there are interactions with Public Agents, the performance must be in an integral way, adopting a transparent and responsible behavior, respecting all applicable laws, national and international standards, as well as all Policies, procedures, guidelines and orientations of Bimbo Brazil, the following behaviors must be adopted:



- Identify yourself correctly and clearly as a representative of Bimbo Brazil, ensuring accuracy and veracity of all statements or information provided.
- Try to stay focused if you are asked about any other subject, you are unfamiliar with and if you do not have security or autonomy to deal with, do not take a position, inform that the matter will be directed to the competent team.
- Avoid controversial topics such as politics, religion, among others that may cause discomfort during conversations with the Public Agent.
- Avoid comments and/or personal opinions, especially about parties, political positions or on other Public Agents. The political environment is extremely ramified and filled with constant relationships and rearrangements.
- Keep matters at a technical level and/or of interest to Bimbo Brazil. Any comment that may generate discomfort in the approach with the Public Power, or even be associated with a company positioning is prohibited by Bimbo Brazil's Rules of Conduct and Compliance.
- Always treat the Public Agent with cordiality and even if the treatment of the other party is not cordial, try to avoid conflicts and/or discussions that may cause discomfort.

**In the face of approaches that generate discomfort, the following measures should be adopted**

- Call the Legal/Compliance department in advance and ask for the support of a lawyer if you identify the risk of an unwanted approach, a complex negotiation, or the need to assume public commitments on behalf of Bimbo Brazil.
- For matters of an institutional nature (Relationship with supervisory and government bodies, regulatory matters, of local logistical and community interest), call the Affairs area Corporate for better guidance.

**Reception and monitoring of Public Agents or Inspection Organ**

- The main objective of receiving, contacting and/or accompanying Public Agents is to verification of compliance with obligations provided for by law, such as labor, health, tax, environmental, among others.
- The agent of the inspection body must obligatorily identify himself when in reception of the Factory Plants or Sales Centers, presenting its official functional identification, which grants it powers to exercise of the activity.
- If the agent shows up at Bimbo Brazil stores expêndio, the collaborator responsible for reception must accompany the agent to the Plant's Entrance for identification and direction.
- Upon receipt of the Public Agent at Bimbo Brazil's Factory Plants or Sales Centers, the person responsible for receiving must make sure that the visit has as objective and destination Bimbo Brazil.
- As soon as the correct identification of the agent is carried out, the contact with the sector of interest must be carried out, according to the guidelines in the table below of Persons Responsible for Reception and Follow-up of Public Agents, requesting the presence of the person in charge whenever possible.

- Contact must be made on an urgent basis through the communication tools made available by Bimbo Brazil (such as: Cell Phone, Extension Line, Teams, Radio communication or email).
- The area responsible for contacting the Public Agent must document the visits made to the Bimbo premises via email [compliance.bb@grupobimbo.com](mailto:compliance.bb@grupobimbo.com)

When receiving an inspector or Public Agent at the plants or sales centers, the person in charge does not should:

- Blocking the work of enforcement. The execution of the work of the Public Agent must be facilitated, strictly observing the object described in the order.
- Staying alone with a Public Agent, calling another collaborator when possible.
- Hinder the investigation or inspection activity of bodies, entities, or Public Agents, hide, or destroy documents, delete emails, leave the company with documents or equipment, or objects of search and seizure.

**Note:** for reception by Public Agents of a personal nature and addressed to Bimbo collaborators Brazil, the ordinance must inform the People Management area, which will notify the collaborator. The reception of agents of a personal nature must take place outside the premises of Bimbo Brazil.

It is important to emphasize that Bimbo Brazil does not condone the omission, concealment, and suppression of information regarding the whereabouts of its collaborators, provided they are officially requested. As soon as the correct identification of the agent, the contact with the sector of interest must be carried out, as guidelines for the table of Persons Responsible for Receiving and Monitoring Public Agents requesting the presence of the person in charge whenever possible.

**Persons responsible for receiving and monitoring public agents:**

Supervisory Organ	Responsible
National Health Surveillance Agency (NHTSA)	Quality Control and Food Safety Area
	Lawyer/Legal
Consumer Protection Offices	Quality Control and Food Safety Area
	Lawyer/Legal
Metrology Institutes	Quality Control and Food Safety Area
	Lawyer/Legal
Regional Chemistry Councils	Quality Control and Food Safety Area
	Lawyer/Legal
Regional Engineering Councils	Maintenance / engineering area
	Lawyer/Legal
Environmental Bodies and Environmental Police Stations	Health, Safety and Environment Area
	Lawyer/Legal
Ministry of Labor	Lawyer/Legal

Fire Department	Health, Safety and Environment Area
	Lawyer/Legal
Secretary of Finance and/or Urbanism	Tax Area
	Lawyer/Legal
Bailiff (attachment procedure)	Lawyer/Legal
National Water Agency	Health, Safety and Environment Area
	Lawyer/Legal
Municipalities (Tax Inspection)	Tax Area
	Lawyer/Legal
Secretary of Finance (Tax Inspection)	Tax Area
	Lawyer/Legal
Federal Revenue Service (Tax Inspection)	Tax Area
	Lawyer/Legal
Military, Civil or Federal Police and Municipal Guard	Property Security Area
	Lawyer/Legal
Brazilian army	Property Security Area
	Lawyer/Legal
Division of Controlled Products (Military, Civil or Federal Police and Municipal Guard and Brazilian Army)	Health, Safety and Environment Area
	Lawyer/Legal

**G. Receipt of notices, letters, and subpoenas**

- Upon receipt of the communication, notification, letter and/or subpoenas at the Plants or Centers of Sales at Bimbo Brazil, the person responsible for receiving it must make sure that the document is addressed to Bimbo Brazil.
- Upon receipt, the correspondence must be immediately delivered to the responsible area and to the Legal/Compliance Department. If this is not possible, the receiver must scan the envelope and immediately send the responsible area and the Legal/Compliance Department by email and Teams and then via offices internal/post the physical correspondence. It is important to confirm through the communication channels the receipt of the e-mail and the original copy.

**Note:** *never keep an official document at the location without alerting the Department in charge, who must be immediately activated and receive a scanned copy in the communication.*

**H. Obtaining and renewing licenses and permits**

The obtaining or revalidation of licenses of any nature (example: environmental, operating, firefighters, etc.) is an extremely important activity for Bimbo Brazil, and must be carried out with the highest transparency, fairness and in accordance with the principles of ethics and integrity, always in accordance with the applicable legal standards:



- For the representation of Bimbo Brazil within the scope of a formal licensing process, its collaborators or business partners must be duly established with powers of representation, granted through a power of attorney (Power of Attorney) of Bimbo Brazil.
- Consultants hired for technical support in the process must observe the rules of Bimbo Brazil Compliance.
- The granting of powers of attorney for business partners must be evaluated and approved by the Legal Department.
- Legal fees, authorizations and permits must be paid only by Bimbo Brazil, through process via the payment system in favor of the competent public body, and in strict compliance with applicable law. Exceptions to the payment process must be aligned and approved by the Controller and/or Finance Administration Director.

**I. Institutional relationship with the Public Power**

- The Corporate Affairs area is the only official area of Bimbo Brazil for relationship institutional with the Public Power.
- All commercial/institutional interaction with Public Agents must be carried out, preferably, in the presence of at least 02 (two) collaborators of Bimbo Brazil.
- All interactions that produce commercial or institutional effects must, without exception, be documented in minutes electronically and sent to the General Manager and the Compliance area.
- It is forbidden to hold commercial or institutional meetings on the premises of Bimbo Brazil with Public Agents who are in the electoral campaign period.

**J. Third Party Code of Conduct**

So that suppliers and third parties acting on behalf of Grupo Bimbo can operate in accordance with this policy, the Company has issued a third-party code of conduct, which is mandatory for any person or entity wishing to do business with Grupo Bimbo.

Institutional meetings (example: meeting with Secretaries, Governors, Mayors, etc.) should be directed to the Corporate Affairs area.

**K. Penalty**

Violations of this Policy will also be considered as violations of Grupo Bimbo's Code of Ethics and Global Integrity Policy, subjecting its offenders to applicable disciplinary penalties, including warnings, suspensions, contract termination and dismissals for just cause, in addition to presenting the fact to the appropriate authorities. **Collaborators** will therefore be legally and disciplinarily liable when applicable. Business partners will also be liable civilly and criminally for violations of this Policy, in addition to the possibility of applying the foreseen contractual penalties.

**L. Reporting violations and complaints**

Any violation of this Policy must be reported immediately using the reporting channel Comenta, by e-mail: [comenta@grupobimbo.com](mailto:comenta@grupobimbo.com) or by phone: 0800 892 3255, a form of Confidential communication that guarantees anonymity, preventing retaliation by the whistleblower.



If the **collaborator** is unsure whether any conduct constitutes an act of corruption or bribery, he or she may consult the Legal/Compliance Department to resolve the issue.

**M. Audits and monitoring**

Usual monitoring activities and audits will be carried out within Grupo Bimbo to verify compliance with the Policy. These audits can be carried out by internal or external auditors. The **collaborators** will have the obligation to provide the auditors with the requested information. In the case of such information is protected by confidentiality obligations, the information must be submitted to the Legal/Compliance Department, who will determine how to provide them to auditors.

**N. Documentation and justifications**

Whenever there is an exception to the rules of this Policy, the Compliance area must validate the request, it is necessary to send documentation and justifications.

**O. References**

- GGB-001 Grupo Bimbo Code of Ethics
- GGB-004 Global Integrity Policy
- GGB-013 Global Travel Expenses Policy
- PBB-FI-01 Corporate Travel Procedure
- FGB-IR-02 Global Donation Policy - Social Impact
- FGB-EPR-03 Code of Conduct for Grupo Bimbo Suppliers (External Policy)
- GGB-014 Global Conflict of Interest Policy

**6. Responsibility / Ownership**

The Legal/Compliance area is the designated owner of this policy and primarily responsible for its content, updating and compliance monitoring, as well as submitting it for approval to the local area of Internal Control and Risk Management and Board of the area or Board of Organization

**7. Updates**

Changes made between versions are described.

Revision/revision history				
Version	Date of revision	Updated Per	Approved by	Changes Main
<b>1</b>	25/03/2021	Karen Marques Vieira Santos e Lays Pereira Fernandes da Silva	Mário Escotero e Sandra Regina Solla.	<ul style="list-style-type: none"> <li>• Changing the name of the channel complaints to (Comenta);</li> <li>• Inclusion of nomenclature Policy;</li> <li>• Changing the name of the Management for (Management Directorate of People and Legal Management Compliance).</li> </ul>
Publication date: March 2021		Replace: N/A		<i>Pag: 15 of 17</i>

2	03/03/2022	Karen Marques Vieira Santos e Lays Pereira Fernandes da Silva	Sandra Regina Solla, Ignacio Gabriel Stepancic e Alfonso Argudin Alvare	<ul style="list-style-type: none"> <li>• In topic 4. Responsibilities, has been changed the term "Regulation" to "Policy";</li> <li>• In topic 6. Responsibility area has been changed to "Compliance";</li> <li>• Changing the name of the Management of Management People and Legal Management Compliance for Management Legal and Compliance / Management Global Compliance.</li> </ul>
3	02/03/2023	Karen Marques Vieira Santos	Sandra Regina Solla/ Ignacio Gabriel Stepancic/ Alfonso Argudin Alvarez/ Evelyne Faccio/ Sergio Henrique da Silva Bandeira/Everton Moya	<ul style="list-style-type: none"> <li>• Information has been entered to in order to detail the following topics: Purpose; reach and Definitions and Responsibilities;</li> <li>• Consolidated following documents: OBB CP-03 Gifts, Presents and Hospitality Policy; 9.R.015 Regulation Sponsorships, Donations and Contributions; 9.R.019 Interaction Regulation Public Agents;</li> <li>• On the topic of gifts, presents and hospitality was added to TRACEgifts tool for registration of gifts received;</li> <li>• Still on the topic of gifts instructions have been inserted there is impossibility of refusal in the delivery of gifts;</li> <li>• On topic Hospitality/Entertainment, were inserted the offer possibilities and accepted for events professionals;</li> <li>• In the topic of donations, a the need for approval Global Compliance preview for donations to agent or public entity;</li> <li>• In the topic of donations, a the need for prior compliance approval Officer.</li> <li>• In the topic of donations was minimum period of shelf life of products;</li> </ul>



## Anti-Bribery Policy - ABMS

Legal Director/Legal and Compliance Management

**OBB-CP-01**

				<ul style="list-style-type: none"><li>• In the topic of interaction with public agents in the responsible for the reception, the legal area was inserted in all lines;</li><li>• The topic of Audit and monitoring</li></ul>
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