



# Global Policy on the Prevention of Harassment and Discrimination

Global People Department

GGB-018

## 1. Purpose

Provide general guidelines for a workplace free of harassment, violence, mobbing, sexual harassment and discrimination within Grupo Bimbo.

## 2. Scope

Applies to all Grupo Bimbo's associates and third parties that have employment relationships, provide services and/or participate in internal or external activities with the Company.

## 3. Definitions

**Labor harassment and mobbing:** Exposure to non-sexual conduct that denigrates, discredits or minimizes a person, and jeopardize the associate's mental and physical integrity, as well as his/her career development. This exposure takes place at work or while engaging in Grupo Bimbo business and generates an intimidating, humiliating, degrading or offensive environment for the person that receives it.

**Sexual harassment:** Any unwanted verbal, visual or physical conduct of a sexual nature, where submission to or rejection of such conduct is made a condition of employment or where such conduct creates an offensive, abusive or hostile work environment.

**Physical violence:** Any physical aggression against one or more persons in work-related situations, that undermine the person's dignity, harm his/her health and/or create a hostile working environment. All types of violence have a psychological impact on the person.

**Discriminatory actions (class harassment):** Include any action based on race, color, religion, disability, gender, age, national origin, sexual preference, marital status, pregnancy, an individual's personal characteristics or any other classification protected by the local law, that infringe on another person's dignity or creates an intimidating, hostile, humiliating or offensive environment.

### **Types of harassment, violence and discrimination:**

- Horizontal: Actions among co-workers with no reporting authority;
- Vertical descending: Actions by someone holding authority or superior positions relative to the recipient(s) of the behavior;
- Vertical ascending: Actions by someone in a subordinate position relative to the recipient(s) of the behavior.

## 4. Responsibilities

**Associates:** To behave in compliance with the Code of Ethics, the Diversity and Inclusion Global Policy, and this Policy to create an environment free of violence, harassment, mobbing, sexual harassment and discrimination in the workplace.

**Managers and supervisors:** To comply with and enforce this policy in accordance with the Code of Ethics and the Diversity and Inclusion Global Policy; to execute the sanctions or recommendations derived from the violation of this policy and foster a culture of inclusion at all times.

**Ethics Committee and Compliance and/or Diversity and Inclusion Global Committee:** To review matters related to sexual harassment and physical violence, or matters involving potential conflict of interest when they cannot be addressed by the Speak Up Line of the Organization.

**Speak Up Line (hotline) Committees:** To address promptly and impartially all reports of violence, harassment and discrimination seeking to solve, educate and/or enforce the necessary sanctions to guarantee a climate of respect for the audiences mentioned in this policy.

**People VPs:** To monitor compliance with this policy and the global and local consequences system, and contribute to solve sexual harassment, physical violence or with potential conflict of interests cases, involving executive-level associates.

**People areas:** Responsible for training and educating all associates regarding this policy.

**Procurement and Sales areas:** Responsible for communicating this policy to suppliers and third parties that have contact with Grupo Bimbo.

**Diversity and Inclusion specialists:** To advising the Speak Up Line (hotline) Committees in case of doubts over the enforcement of this policy.

## **5. General guidelines**

All associates, shareholders, suppliers, consultants and visitors working or interacting in activities of the Company, within or outside it, have the right to experience an environment of respect, free of all types of violence, mobbing, sexual harassment, labor harassment and discrimination; therefore:

- A. It will not be tolerated any conduct that undermines the dignity of a person or otherwise creates a discriminatory, offensive, or hostile environment. Whether such behavior has occurred is determined by the effect of the behavior on the recipient(s), regardless of intent.
- B. It is prohibited any actual or threatened physical aggression or violence while at work or on Grupo Bimbo business.
- C. It is a policy of Grupo Bimbo to comply with the following guidelines:
  - All associates are expected to immediately report any conduct that they believe violates this policy.
  - Any associate who considers having been subject to a behavior prohibited by this policy may take any of the following actions, according to the gravity of the action and the opportunity allowed by the situation:
    - Tell the person to stop the behavior and report the action to the offender's immediate supervisor to set a verbal precedent;
    - Report the conduct to his/her immediate supervisor, to the immediate supervisor of the person who engaged in the conduct, or to Human Relations area; or
    - Issue a report in the Speak Up Line (hotline).
  - All reports on inappropriate behavior will be thoroughly reviewed up to its ultimate consequences.
  - Recommendations issued are to be enforced immediately in order to discourage reiteration of inappropriate behaviors.
  - In every investigation carried out, the right to be heard will be granted to both parties to ensure that they are both considered in the investigation.
  - For any conduct described in this policy, reiteration or frequency shall not be necessary elements since a single action constitutes a violation to it.
  - The consequences for violating this policy will vary according to the severity of the action and local legislation; thus, the following sanctions may be enforced:
    - Verbal feedback and written reprimand if necessary
    - Official report
    - Temporary suspension without pay
    - **Termination of employment with justified reason**
    - Contacting local law enforcement to secure justice

### **No retaliation**



## Global Policy on the Prevention of Harassment and Discrimination

Global People Department

GGB-018

Grupo Bimbo strictly prohibits retaliation against any person who in good faith reports having been subjected to conduct that violates this policy, including harassment, sexual harassment, mobbing, physical violence, discrimination or for assisting in an investigation.

Refer to: [Speak Up Line \(hotline\) Global Policy](#)

Refer to: [Diversity and Inclusion Global Policy](#)

### 6. Responsibility / Ownership

The Global People Department is the assigned owner of this policy and is primarily responsible for its contents, updating, monitoring of its compliance and submission for approval before the Steering Committee and CEO.

### 7. Updates

The changes implemented among versions are described below:

Revisions / Revision Log				
Version	Revision Date	Updated by	Approved by	Main Changes
1				