

IFRS S1 & S2 REPORT 2025

GRUMA, S.A.B. DE C.V.



Calzada del Valle 407 Ote., Col. del Valle, San Pedro Garza García, N.L.

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1. PREPARATION BASIS AND COMPLIANCE STATEMENT

1.1 Compliance statement

S1.3, S1.4, S1.5, S1.6, S1.7, S1.8, S1.9, S1.72, S1.73, S2.1, S2.2

In preparation for compliance with the latest provisions issued by the Mexico's National Banking and Securities Commission (*Comisión Nacional Bancaria y de Valores*) (“CNBV”), GRUMA, S.A.B. de C.V. (“GRUMA” or “the Company”) has prepared its first sustainability-related financial disclosure report in accordance with the International Financial Reporting Standards (“IFRS”) for Sustainability Disclosure Standards issued by the International Sustainability Standards Board (“ISSB”), specifically IFRS S1, “*General Requirements for Disclosure of Sustainability-related Financial Information*”, and IFRS S2, “*Climate-related Disclosures*”.

These standards became mandatory for issuers in Mexico as of the publication of the amendments to the General Provisions Applicable to Securities Issuers and Other Participants in the Securities Market (*Disposiciones de Carácter General Aplicables a las Emisoras de Valores y a Otros Participantes del Mercado de Valores*) on January 28, 2025, commonly known in Spanish as the *Circular Única de Emisoras* (“CUE”), regarding sustainability-related disclosures in Mexico’s Official Gazette of the Federation (*Diario Oficial de la Federación*) (“DOF”). The CNBV mandated the adoption of these standards as part of its strategy to enhance the transparency, consistency, and comparability of sustainability-related information within the Mexican financial market.

This report has been prepared in accordance with the IFRS Sustainability Disclosure Standards issued by the ISSB and reflects the information available as of the end of the 2025 reporting period.

1.2 Fair presentation and first-time adoption considerations

S1.12, S1.13, S1.15, S1.16, S1.25 (a)(b)(c)(d), S1.37(a)(b), S1.38(a)(b), S1.39, S1.40(a), S1.49, S1.51, S1.52, S1.53, S1.55(a), S1.E4, S2.11, S2.12, S2.18(a)(b), S2.19(a)(b), S2.20, S2.21(a)(b)(c), S2.C3, S2.C4(b)

The information included in this report has been prepared in accordance with the fair presentation principle set forth in IFRS S1, which indicates that a complete set of sustainability-related financial disclosures shall present fairly all sustainability-related risks and opportunities that could reasonably be expected to affect an entity’s prospects over the short, medium, and long term, taking into account and, where information is available, disclosing the governance, strategy, risk management, and metrics and targets for each reported risk and opportunity.

To comply with this principle, the Company has identified, assessed, and disclosed environmental, social, and governance-related risks and opportunities that could reasonably affect its financial performance, financial position, cash flows, or access to finance or cost of capital, taking into account both its own operations and its value chain.

When identifying sustainability and climate-related risks and opportunities, the Company considered the Sustainability Accounting Standards Board (“SASB”) standards applicable to FB-PF | Processed Foods and FB-AG | Agricultural Products. The inclusion of the FB-AG | Agricultural

Products standard reflects the significance of the Company's agricultural supply chain, as its principal main suppliers and essential raw materials belong to the agri-food sector.

Furthermore, the topics outlined under FB-PF | Processed Foods were considered, as they pertain to the Company's primary industry.

In addition, the Company adheres to the transitional provisions provided under IFRS S1 and IFRS S2 and has applied the following first-year adoption principles and considerations to allow a phased implementation aligned with its operational context.

1. **Comparative Information Transition Consideration:** No comparative information for prior periods is presented in this report.
2. **Transitional Provisions Consideration:** The Company has elected to apply the transitional provisions under IFRS S1 for the first reporting period, which permit the issuance of this report after the publication of the corresponding consolidated financial statements. Accordingly, this report is being published concurrently with the Company's financial information for the second quarter of 2026.
3. **Scope 3 Greenhouse Gas Emissions Disclosure Transition Consideration:** This report does not include information regarding Scope 3 greenhouse gas ("GHG") emissions.
4. **Proportionality Principle:** The Company uses reasonable and supportable information available at the time of preparing this report, without incurring undue cost or effort. Likewise, this report has been prepared using the skills, capabilities, and resources currently available within the organization.
5. **Uncertainty Principle:** The Company applies the uncertainty principle through the disclosure of reasonable estimates based on the best information available at the reporting date. Where quantitative information is not feasible or sufficiently reliable, qualitative approaches have been used to appropriately reflect the level of uncertainty and its potential effects on financial performance and sustainability-related matters.

As of the end of the reporting period, the metrics and targets associated with the reported risks and opportunities remain under development, except where otherwise indicated.

1.3 Reporting scope

S1.20, S1.21(a), S1.22, S1.23, S1.B3, S1.B29, S1.B30, S1.B31, S1.B32, S1.B33

The information presented covers GRUMA, S.A.B. de C.V. and its consolidated subsidiaries, in accordance with the scope used in the preparation of its audited consolidated financial statements, in order to ensure alignment between the Company's financial information and its sustainability-related financial disclosures.

The geographic scope of this report encompasses the Company's operations in Mexico and abroad through its consolidated operating subsidiaries, including:

- Mexico (including Grupo Industrial Maseca and other operating subsidiaries)
- United States (including Gruma Corporation and Azteca Milling)
- Europe
- Central America
- Asia and Oceania

The reporting boundary is based on the concept of control as applied in accordance with the International Financial Reporting Standards applicable to the consolidated financial statements, thereby ensuring the information disclosed is consistent with the Company's consolidated financial statements.

When relevant information pertains to the value chain and is not under the Company's direct control, reasonable estimates, supplier-provided information, industry data, or other available sources are used, as permitted under IFRS S1.

1.4 Reporting currency

[S1.24](#)

Consistent with the Company's consolidated financial statements, the presentation currency for the quantitative information included in this disclosure is the United States of America dollar.

1.5 Reporting period

[S1.64](#), [S1.65](#), [S1.66\(a\)\(b\)](#)

This report covers the fiscal year ended December 31, 2025, and is aligned with the reporting period of the Company's consolidated financial statements.

2. BUSINESS MODEL AND VALUE CHAIN

S1.20, S1.32 (a)(b), S2.13(a)(b)

2.1 Business model

GRUMA, S.A.B. de C.V. is one of the world's leading producers of tortillas and nixtamalized corn flour. Founded in 1949, the Company primarily focuses on the production of corn flour, tortillas, and other corn and wheat-based products, with leading brands in most of the markets in which it operates. The Company has operations in the United States of America, Mexico, Europe, Central America, Asia, and Oceania. During 2025, the Company reported consolidated net sales of U.S. \$6,374.62 million and a total production volume of 4,337 thousand tons.

As of year-end, the Company had 77 plants and had a global workforce of 25,213 employees, enabling it to maintain a diversified manufacturing network and proximity to its key consumer markets. The Company operates under a vertically integrated business model that spans the sourcing of agricultural raw materials through the production, distribution, and sale of finished products. This approach enables strict quality standards, efficient resource use, and enhanced traceability throughout its operations.

Globally, the Company's operations are distributed across the United States of America, Mexico, Spain, Italy, Russia, Turkey, Ukraine, England, Costa Rica, Honduras, Guatemala, Ecuador, China, Malaysia, and Australia.

This geographic diversification reduces the concentration of risks and opportunities in any single region; however, it also exposes the Company to sustainability-related risks and opportunities associated with climate change, raw material availability, food regulation, labor conditions, and supply chain stability.

2.1.1 Current and anticipated effects of risks and opportunities on the business model

S1.28, S1.29 (a)(b), S1.30 (a), S1.32 (a)(b), S2.11, S1.34(a)(b), S1.35(a)(b)(c)(i)(ii)(d)(e)

The Company has assessed the current and anticipated effects of sustainability-related risks and opportunities on its business model as part of the process for identifying and assessing risks and opportunities that could reasonably affect its financial prospects over the short, medium, and long term.

As a result of this analysis, 14 risks and 4 opportunities related to environmental, social, and governance factors were identified as of the end of the reporting period.

As of the reporting date, the Company believes it has the necessary operational, financial, and human resources structure to manage the identified risks in the ordinary course of business. Based on this assessment, the Company does not currently anticipate any effects that would result in structural changes to its business model or affect its ability to continue operating.

However, under certain circumstances, the described risks and opportunities, as well as the actions taken to manage them, may give rise to financial effects in specific reporting periods. The financial

effects identified during the reporting period are disclosed in the sections corresponding to each risk and opportunity.

These potential financial effects are considered as part of the Company's overall risk management process and are integrated into its financial planning, investment evaluation, and strategic decision-making processes.

2.2 Value chain

S1.32 (a)(b)

The identification of sustainability-related risks and opportunities takes into account the Company's value chain, including upstream activities¹ (hereinafter, the "supply chain"), the Company's own operations, and downstream activities² (hereinafter, the "commercial chain").

The value chain begins with the procurement of agricultural raw materials, primarily corn and wheat, as well as oils, packaging materials, additives, and other inputs. These raw materials are transformed into food products through milling, nixtamalization, and a variety of cooking processes at Company-owned plants located across different regions of the world.

Subsequently, the products are distributed through the Company's own and third-party logistics networks to wholesalers, retailers, supermarket chains, restaurants, and industrial customers, ultimately reaching the end consumer.

In general, the value chain consists of the following stages:

1. **Raw Material Sourcing:** Includes the procurement of corn, wheat, and other inputs, as well as relationships with farmers, suppliers, and commodity traders.
2. **Production and Processing:** Includes milling, nixtamalization, and the production of corn flour, tortillas, and other derived products, as well as the use of energy, water, packaging materials, and other resources.
3. **Distribution and Logistics:** Includes storage, transportation, and commercialization activities across multiple countries and distribution channels.
4. **Customers and Consumers:** Includes sales to retail chains, restaurants, distributors, and end consumers.

2.2.1 Current and anticipated effects of risks and opportunities on the value chain

S1.32(a)(b), S1.34(a)(b), S1.35(a)(b)(c)(i)(ii)(d)(e)

The analysis conducted, including the double materiality assessment performed between the Q4 2024 and Q3 2025, identified that a significant portion of the Company's sustainability-related risks

¹ Upstream activities: Refers to the stage of the value chain associated with the sourcing and production of inputs, involving suppliers, primary producers, raw material intermediaries, transportation and storage services prior to manufacturing, as well as activities related to the extraction, cultivation, and initial processing of inputs.

² Downstream activities: Refers to the stage of the value chain associated with commercial activities, involving intermediaries, logistics service providers, retail locations, business partners, customers and end consumers, recycling facilities, and landfills.

and opportunities originate in, or have effects across the value chain, particularly within the supply chain and its own operations.

Within the supply chain segment, the main factors are associated with agricultural production and the supply of raw materials, including risks related to the effects of climate change on the availability and quality of corn and other inputs, business practices and labor conditions within the supply chain, and the need to strengthen suppliers' technical and productive capabilities.

Within the Company's own operations, the identified risks and opportunities primarily relate to energy and water efficiency, operational continuity at milling and production plants, compliance with environmental, food safety, and labor regulations, as well as investments in technological modernization, energy efficiency, and operational resilience.

Within the commercial chain segment, the identified risks and opportunities focus primarily on food quality and safety, sustainability criteria applicable to packaging, and brand reputation and consumer trust.

As of the reporting date, the Company does not consider the risks and opportunities described represent a structural impact on the value chain or on the Company's ongoing operations. However, the Company acknowledges that, if left unmanaged, these risks could have an adverse effect on its results, operations, or reputation, given that events beyond the Company's control may negatively impact the business.

For this reason, the Company maintains continuous monitoring mechanisms, including due diligence processes, supplier assessments, quality controls, internal audits, and operational performance tracking, among others, in order to mitigate potential adverse effects on operations and financial performance.

From a geographic perspective, Mexico and the United States are the regions where relevant risks or opportunities are more likely to arise, due to the scale of operations, the concentration of productive assets, and the significance of these markets for the Company's financial performance.

3. USE OF JUDGMENTS, ASSUMPTIONS, AND UNCERTAINTY

S1.23, S1.44(a)(i)(iii)(iv)(vi)(b)(c), S1.45, S1.46(a)(b)(i)(ii), S1.47, S1.48, S1.36, S1.74, S1.75(a)(b)(c)(d), S2.5, S2.9

The preparation of sustainability-related financial disclosures requires the Company to use judgments, assumptions, and uncertainties that may affect the measurement, recognition, and disclosure of sustainability-related risks and opportunities, as well as the quantitative and qualitative information presented in this report. These judgments and estimates are based on the best information available as of the reporting date, including historical data, internal information, regulatory requirements, internationally recognized methodologies, and reasonable assumptions regarding future conditions.

Due to the inherent nature of sustainability-related information, particularly regarding issues such as climate change, the value chain, indirect emissions, physical and transition risks, and social factors, actual results may differ from the estimates used. When information required by the IFRS Sustainability Disclosure Standards is not directly available, the Company uses reasonable and supported estimates consistent with the requirements of the applicable standard and discloses the nature of such estimates when relevant for the understanding of the information. In this first reporting year, disclosures are based primarily on qualitative analysis.

Throughout 2025 and in the months leading up to the publication of this report, the Company further developed its analyses related to IFRS S1 and IFRS S2 disclosures. This process has enabled the Company to gradually deepen its understanding of sustainability-related risks and opportunities, as well as the assumptions and information used in its assessments.

3.1 Sources of information, methodologies, and limitations

S1.5, S1.6, S2.15, S1.33, S1.37, S1.54, S1.55(a), S1.58, S1.59(a)(b), S1.77, S1.78(a)(b), S1.79, S1.80, S2.15, S1.B6(a)(b), S1.B7, S1.B8, S1.B9, S1.B10

The information included in this report has been prepared using data from internal systems, operational records, consolidated financial information, subsidiary reports, supplier-provided information, technical studies, competitor and industry maturity benchmarking, press and media analyses, international methodologies, and other sources available as of the end of the reporting period.

In some cases, particularly regarding value chain information, climate-related risks, social indicators, or data obtained from third parties, the Company has used assumptions, emission factors, industry averages, and other accepted methodologies when complete direct information is not available.

The Company continues to strengthen its internal processes for collecting, validating, and controlling sustainability-related data as part of its preparation for mandatory regulatory compliance and to improve the quality, consistency, and comparability of the reported information.

Where limitations exist regarding the availability or quality of information, these have been taken into account when preparing the disclosures, ensuring that the information presented is complete, unbiased, and accurate under the existing circumstances.

3.2 Connectivity with the consolidated financial statements of GRUMA and its subsidiaries

S1.3, S1.6, S1.7, S1.9, S1.21(a)(b)(i)(ii), S1.25, S1.42, S1.43, S2.2, S1.B40(c), S1.B41(a)(i)(ii)(b)

This report provides users with information on the sustainability-related matters identified as relevant, including disclosures regarding their current status and how they are managed, recognizing the interconnected nature of the associated risks and opportunities.

The sustainability-related financial information presented has been prepared taking into account its consistency with the consolidated financial statements of GRUMA, S.A.B. de C.V. and its subsidiaries for the year ended December 31, 2025, to the extent that both reflect the financial effects resulting from the Company's activities and operating conditions.

In this context, certain sustainability-related matters may be incorporated, as applicable, into accounting estimates, provisions, impairments, investments, operating expenses, or other relevant financial statement items, without implying the application of specific criteria or classifications under a sustainability label. Furthermore, such integration does not imply the separate identification or measurement of these factors under a specific sustainability framework within the consolidated financial statements.

As of December 31, 2025, the Company has not identified any material effects on its financial position arising from sustainability-related risks and opportunities, as disclosed in its 2025 Annual Report. However, management continues to strengthen its processes for assessing the Company's financial exposure and business resilience to physical and transition risks associated with climate change, considering evolving climate, regulatory, and market conditions.

During 2025 and the months preceding the issuance of this report, the Company further developed its analyses related to IFRS S1 and IFRS S2 disclosures. This process has enabled the Company to gradually enhance its understanding of sustainability-related risks and opportunities, the assumptions, and the information used in the assessments.

4. MATERIALITY AND IDENTIFICATION OF SUSTAINABILITY-RELATED RISKS AND OPPORTUNITIES

S1.3, S1.6, S1.9, S1.14, S1.17, S1.18, S1.19, S1.20, S1.21(a), S1.23, S1.43 (a), S1.44 (a)(iii)(b), S1. B13, S1.B20, S1.B21, S1.B22(a)(b), S1.B23, S1.B24, S1.B25, S1.B27(a)(b)(c)(d)(e)(f), S1.B39

The Company identifies and discloses only those sustainability-related risks and opportunities that could reasonably be expected to affect its financial prospects, including its financial performance, financial position, cash flows, access to finance, or cost of capital. For this purpose, the Company conducted an analysis using a double materiality approach, which enabled the identification of both the environmental, social, and governance impacts and the related financial risks and opportunities.

For IFRS reporting purposes, the final determination of the matters to be disclosed in this report is based on the financial materiality perspective of the double materiality assessment, primarily derived from qualitative information, in accordance with IFRS S1 paragraphs 24, 29, 30, and 41 to 44, as well as IFRS S2. Matters that solely represent external impacts without relevant financial implications are excluded.

This process is aligned with the Company's corporate risk management framework and considers both its own operations and its value chain.

4.1 Materiality assessment methodology

To identify each sustainability-related risk and opportunity, the following variables were assessed:

- Nature and magnitude of the financial effect
- Probability of occurrence

Magnitude

Magnitude was assessed by considering the potential effect on relevant financial variables, including revenue, costs, earnings before interest, taxes, depreciation, and amortization ("EBITDA"), cash flows, capital expenditures ("CAPEX"), operating expenses ("OPEX"), asset values, operational continuity, regulatory compliance, reputational effects, and access to financing. Applicable international standards (SASB, TCFD³, and ESRS⁴, among others) were also taken into account.

A five-level scale was used:

1. Low: Minor financial effects; minimal changes in costs or revenue.
2. Moderate: Localized or short-term effects on costs or revenue.
3. Significant: Material effects on a major business division or main product line.
4. High: Corporate-level effects; affects EBITDA, cash flows, or valuation.
5. Severe: Fundamental risk to the business model or financial sustainability.

³ Task Force on Climate-related Financial Disclosures ("TCFD")

⁴ European Sustainability Reporting Standards ("ESRS")

To determine magnitude, the Company considered its internal financial and operational risk matrices, risks identified through interviews with relevant areas, and regulatory and industry analyses.

Probability

Probability was assessed by considering the reasonable possibility of occurrence within the scope of the analysis, accounting for historical evidence that supports the recurrence and observed behavior of similar events in the past, as well as regulatory and industry trends.

A five-level scale was used:

1. Rare: Unlikely without a significant systemic change.
2. Unlikely: Some precedent or evidence exists, but the probability is low.
3. Possible: Medium-term trends indicate a growing risk.
4. Likely: Known risk with persistent or increasing signs.
5. Certain: Already occurring or imminent.

The final probability was determined by considering the factors described above, the level of internal maturity in managing the subject, and the level of external maturity of key suppliers, which were also weighted on a scale of 1 to 5. Internal and external maturity were assessed through interviews, internal questionnaires, supplier questionnaires, documentation reviews, and analysis of existing controls.

Assumptions and judgments applied

The determination of risks and opportunities from a financial perspective required the application of reasonable assumptions, estimates, and judgments, given the forward-looking nature of sustainability-related information and the degree of uncertainty associated with certain external factors, including regulatory changes, market conditions, technological developments, and the effects of climate change.

4.1.1 Judgments applied in value chain mapping

S1.20, S1.21(b), S1.23, S2.9(b), S1.B3, S1.B4, S1.B5

It was determined that the Company does not participate in joint ventures or maintain operations outside its control that represent additional significant risks, therefore, the relevant scope primarily includes activities under the Company's direct control, as well as those over which it exercises influence, such as those related to strategic suppliers and relevant corporate customers. Innovation, product design, packaging, product use, and waste management activities were also considered, which are managed internally through the Company's technical and development functions.

The exclusion of non-controlled operations is based on a methodological criterion based in effective management capacity and the absence of exposure, in accordance with applicable international guidelines.

4.1.2 Judgments applied in identifying other stakeholders

S1.3, S2.9(b), S1.23, S1.25, S1.B2, S1.B3, S1.B4, S1.B5

Stakeholder groups were identified through internal interviews, a review of corporate documentation, and an analysis of external expectations, in order to ensure that the mapping reflects both the Company's strategic perspective and its operational reality.

Stakeholders were classified into:

- Affected parties, and
- Primary users of general-purpose financial information.

Consistent with IFRS S1, the financial materiality assessment focused primarily on investors, analysts, financial institutions, and other users who rely on the information for economic decision-making. This analysis took into account feedback from investors, rating agencies, financial institutions, insurers, and external sustainability assessments, as well as technical risk assessments that include estimates of expected losses, business interruption, and potential climate-related financial effects.

In addition, the analysis drew on documentary research from media and external public sources to substantiate the probability of occurrence of events associated with the analyzed topics. Furthermore, impacts originating within the agricultural supply chain were considered, as these could affect the Company's financial performance, depending on whether or not they are effectively managed.

4.2 Time horizons used in the assessment of risks and opportunities

S1.21(a), S1.30(b)(c), S2.9(c)(d), S2.10(c)(d), S2.11

For the identification, assessment, and disclosure of sustainability and climate-related financial risks and opportunities, the Company adopts the time horizons defined by its Finance and Planning functions, which are used in the evaluation of investments, budgets, provisions, and corporate risk analyses:

- Short term: up to 12 months
- Medium term: 1 to 5 years
- Long term: more than 5 years

These time horizons are applied in the analysis of the Company's operating cycles, the typical useful lives of productive assets, relevant contractual commitments, and the time horizon used for the Company's strategic planning.

For climate-related risks, including both acute and chronic physical risks, the Company used information provided by its global insurer for 2025, FM Global (hereinafter, the "Insurer"), through the Climate Resilience Tracker tool, which considers horizons consistent with climate scenarios of the Intergovernmental Panel on Climate Change ("IPCC").

The methodology employed by the insurer does not distinguish between three discrete time horizons (short, medium, and long term), but rather two continuous climate analysis periods that already incorporate the behavior of the variables within each interval, short-term (2021–2040) and long-term (2041–2060), with each period based on 20 years of data. Therefore, and to give an example, a medium-term horizon would be implicitly incorporated within the progressive evolution covered by the 2021–2040 period.

This approach seeks to align with the leading climate disclosure frameworks (TCFD, ISSB, and CSRD⁵), as well as with the IPCC climate scenarios and the most frequently used global climate milestones, considering representative pathways such as RCP⁶ 2.6 for the shorter-term and RCP 8.5 for the longer-term.

In this context, the horizons used for climate-related analysis correspond to the following representative years within the periods mentioned above:

- Short term: through 2030
- Long term: through 2050

These horizons are a global standard and allow the proper assessment of potential effects of climate change on assets, operations, the supply chain, and product demand, considering the long-term nature of climate-related risks and their possible financial effects.

In practical terms, the Company uses horizons that are aligned with its strategic planning and investments. The 2021–2040 horizon (using 2030 as a reference) facilitates the identification and management of short- and medium-term risks, while the 2041–2060 horizon (using 2050 as a reference) supports the assessment of long-term climate-related risks for strategic decision-making.

⁵ Corporate Sustainability Reporting Directive (“CSRD”)

⁶ Representative Concentration Pathways (“RCPs”)

5. SUSTAINABILITY GOVERNANCE

5.1 Governance structure for the oversight of sustainability-related risks and opportunities

S1.26, S1.27(a)(i)(iii)(iv)(v), S2.4(b), S2.5, S2.6(a)(i)(iii)(iv), S2.7

5.1.1 Highest governance body responsible for the oversight of sustainability-related risks and opportunities

The Company's corporate governance structure is described in detail in section 427000-N of the 2025 Annual Report.

Oversight of sustainability-related risks and opportunities is integrated into the governance structure in accordance with its bylaws and the Mexican Securities Law (*Ley del Mercado de Valores*).

The Audit Committee, established pursuant to the Mexican Securities Law, comprehensively oversees the internal control system, risk management, and all matters within its purview. In this context, the Audit Committee monitors and oversees the ESG⁷ Committee agenda and, where applicable, reports relevant matters arising from such oversight to the Board of Directors.

The ESG Committee is composed of the Chief Administrative Officer, Chief Operating Officer, Chief Financial Officer, Chief Human Resources Officer, General Counsel, and Chief Internal Audit Officer, with Sustainability Management serving as secretaries. This Committee is responsible for the operation, strategic direction, and implementation of initiatives, policies, and action plans related to environmental, social, and governance factors, as well as for the identification and management of associated risks and opportunities.

Internal Audit is responsible for the independent oversight of compliance with internal processes, controls, and guidelines related to risk management, including those linked to sustainability-related matters, and reports directly to the Audit Committee.

Responsibility for sustainability-related matters rests with a team of executives with differentiated sustainability responsibilities, covering environmental, social, and governance aspects. This structure enables the coordination of efforts across multiple corporate functions and the integration of these factors into the Company's operational, financial, and risk management processes.

5.1.2 Management's Role

S1.27(b)(i)(ii), S2.6(b)(i)(ii)

The operational execution of sustainability initiatives is carried out by management teams in each business unit and region. These teams implement controls, gather information, identify risks, and report results at the corporate level, ensuring consistency in the application of the sustainability framework throughout the organization.

⁷ Environmental, Social and Governance ("ESG")

5.2 Integration of sustainability into oversight, strategy, and risk management processes

The Company recognizes sustainability as a cross-cutting matter that affects the different stages of its value chain, in addition to its own operations.

In this context, the Company's existing policies, procedures, and management systems form the basis for the growth and advancement of its sustainability approach. They are also essential for risk management and opportunities related to environmental, social, and governance factors.

Responsibilities related to the identification, assessment, oversight, and management of sustainability-related risks and opportunities are defined in the job descriptions and internal policies applicable to Senior Management and the corresponding management teams, in accordance with the Company's corporate governance framework.

This structure enables the identification of those responsible for operational execution, oversight, and decision-making, the areas that must be consulted during assessment processes, and the information flows to the oversight bodies.

The ESG Committee, together with the sustainability managers, oversees the integration of sustainability-related risks and opportunities within the corporate risk management framework, reviews identified material topics, and assesses their potential financial effects, including effects on revenue, costs, investments, provisions, and access to financing.

The Company has identified the value of formalizing a Corporate Sustainability Policy, which will aim to strengthen the processes for identifying, assessing, prioritizing, monitoring, and reporting sustainability-related risks and opportunities, increasing the traceability and consistency of the current framework.

5.3 Competencies and capabilities for sustainability oversight

[S1.27\(a\)\(ii\)](#), [S26\(a\)\(iii\)](#)

Given the relevance and the evolving nature of sustainability-related matters, the Company has conducted sustainability maturity assessments, gap analyses, and materiality assessments. These processes and their outcomes have served as a basis for increasing knowledge of the subject at the executive level, as well as for identifying needs for strengthening and training in technical capabilities and management systems.

At the Company's plants worldwide, training, capacity-building, and development programs are implemented on social, environmental, product quality, and management system topics, which contribute to the development of capabilities for addressing and overseeing sustainability-related matters.

Additionally, for Senior Management and executive levels, the Company relies on specialized consulting, research, and legal advisory services when deemed necessary, in order to keep

sustainability-related technical and regulatory criteria up to date, as well as to support the corresponding compliance agenda.

Finally, the Company's Board of Directors has experience in strategy and risk management matters.

5.4 Reporting to the Board and oversight of objectives

S1.27(a)(iii)(v), S2.6(a)(v), S2.29(g)

The Company recognizes sustainability as a cross-cutting matter that affects the different stages of its value chain, in addition to its own operations.

In accordance with the legal framework and the Company's Risk Management Policy, all risks and opportunities are reported to the Audit Committee at least quarterly. In this context, both sustainability-related and climate-related risks and opportunities have begun to be incorporated into the Company's current risk management framework.

Senior Management compensation schemes consider the Company's overall performance, aligning incentives with the management of risks and opportunities that could affect the Company's operating and financial results and competitive position.

The compensation structure, including variable remuneration components subject to the achievement of performance objectives, is designed and overseen by the relevant governance bodies, in line with corporate policies and applicable market practices.

Through this approach, the Company seeks to ensure that Senior Management incentives are aligned with the responsible management of relevant risks and opportunities, supporting informed decision-making and the sustainability of the business.

5.5 Role of management and internal controls

S1.27(b), S1.27(b)(i)(ii)

Management teams actively participate in the governance processes, controls, and procedures used to oversee and manage sustainability-related risks and opportunities.

Operational responsibilities are delegated to corporate and divisional sustainability leaders, who implement controls, monitor indicators, coordinate mitigation actions, and report results at the executive level.

Environmental, social, and governance matters are distributed among various corporate functions, including Finance, Operations, Human Resources, Procurement, Legal, and Sustainability, among others, enabling the integration of ESG factors into daily operations and decision-making processes. Management teams use formal controls and procedures to oversee sustainability-related risks and opportunities, integrating them into operational processes, performance objectives, and internal reporting systems.

Performance is monitored and reported to the ESG Committee, enabling the tracking of deviations, strengthening risk management, and ensuring alignment with the corporate strategy and risk management process.

6. STRATEGY

S1.29(c)(d)(e), S1.33(a), S1.42, S1.B43, S2.8, S2.9, S2.14(a)

6.1 Integration of sustainability-related risks and opportunities into strategy

The Company has begun to address sustainability-related risks and opportunities as an integral part of its corporate strategy, financial planning, and business model, rather than as isolated elements. These matters are managed through a centralized governance approach, under which Senior Management oversees how environmental, social, and corporate governance matters are integrated into strategic and operational decision-making.

This approach enables the identification and management of sustainability-related risks and opportunities on a cross-cutting basis, from executive oversight down to operational execution, ensuring that strategic decisions take into account their potential financial, operational, and regulatory effects.

The Company has formalized executive bodies and internal processes that strengthen the oversight of regulatory, operational, and compliance-related risks, aligned with international reporting and risk management standards, including IFRS S1 and S2. This helps reduce contingencies, improve resource allocation, and strengthen business resilience.

Given the technical complexity of the identified risks and opportunities, the Company has begun to develop and strengthen internal monitoring processes that include performance metrics, management methodologies, and action plans associated with each financial material matter, which serve as a basis for strategic decision-making and financial planning.

The Company currently has the following processes and mechanisms in place or under implementation:

- Establishment of the ESG Committee as an internal governance body for the oversight of sustainability-related matters.
- Development of an administrative accountability structure responsible for managing ESG matters (in the process of consolidation).
- Internal publication of key policies, including the “Environmental Management Policy” and the “Sustainable Sourcing Standard”.
- Development of a Sustainability Policy (in progress), which will incorporate the management of risks and opportunities.
- Completion of the Company’s global Double Materiality Assessment in 2025.
- Engagement of consulting services to conduct compliance-related gap analyses.
- Assessment and monitoring of water-related risks using specialized tools (“WRI Aqueduct”).
- Identification and management of physical risks associated with climate change in operations, with support from the Insurer.
- Monitoring and strategic planning of the corn supply chain.

- Measurement and tracking of environmental indicators, including the Scope 1 and Scope 2 greenhouse gas (“GHG”) emissions inventory.
- Tracking of regulatory changes in the jurisdictions where the Company operates.

Additionally, the Company has identified the following actions to strengthen its approach over the short and medium term:

- Budgeting for and implementing consulting services to mature the Enterprise Risk Management (“ERM”) system.
- Expanding oversight to include nature and biodiversity-related risks.
- Assessing and strengthening the mechanisms for communicating internal policies to external stakeholders.

6.2 Effects on financial position, financial performance, and cash flows

[S1.29\(d\)](#), [S1.34 \(a\)\(b\)](#)

The Company has begun to assess the current and anticipated effects of sustainability and climate-related risks and opportunities on its financial position, financial performance, and cash flows, both during the reporting period and over the short, medium, and long term.

6.2.1 Current financial effects

During the reporting period, the Company evaluated and continues to analyze the effects of sustainability-related risks and opportunities on its financial position, financial performance, and cash flows, considering both current effects and potential future effects over the short, medium, and long term.

As of the end of 2025, sustainability-related risks and opportunities were identified as having financial effects during the reporting period, arising from management measures. Details are provided in the description of each risk and opportunity, where applicable.

6.2.2 Anticipated effects

[S1.35\(b\)\(c\)\(i\)\(ii\)\(d\)](#), [S1.36](#), [S1.38\(a\)\(b\)](#), [S1.39](#), [S1.40\(a\)](#), [S2.14\(a\)\(i\)\(ii\)\(iii\)\(iv\)\(v\)\(b\)](#)

The Company has begun to assess whether sustainability-related risks and opportunities could result in effects on the carrying amounts of assets and liabilities recognized in the consolidated financial statements during the next annual reporting period, as well as their potential effects on its financial position, financial performance, and cash flows over the short, medium, and long term.

As a result of this assessment, it was identified that risks primarily related to climate change, energy, regulatory compliance, and operational resilience could require additional expenditures, investments, or provisions during fiscal year 2026, which could affect the carrying amounts of certain assets and liabilities. For example, high volatility was observed in renewable energy certificate (“REC”) markets during 2025, which may continue in future periods.

6.3 Business model and strategy resilience

S1.29(e), S1.41, S1.42, S2.9(e)

At the end of the reporting period, the Company considers that its strategy is designed to maintain the resilience of its business model against sustainability-related risks, including those arising from climate change, raw material availability, regulatory compliance, supply chain conditions, and customer and consumer expectations.

The geographic diversification of operations, the vertical integration of the value chain, and the implementation of formal risk management processes enable the Company to reduce its exposure to adverse events and respond in a timely manner to changes in the economic, environmental, or regulatory environment. In addition, the Company considers long-term scenarios, particularly with respect to climate change, to assess potential effects on its productive assets and business continuity, in order to strengthen its resilience.

To reach this conclusion, the Company applies different analytical methods at different stages, including the selection of relevant scenarios, the identification of information sources, and the assessment of potential effects across different time horizons. Although the possibility of carrying out quantitative estimates was explored, the uncertainty associated with currently available information did not allow for sufficiently reasonable and verifiable projections. Consequently, the Company presents a primarily qualitative assessment and will continue to strengthen its methodologies and access to relevant information.

6.4 Progress relative to prior periods

S1.33(b), S1.70

This reporting exercise represents the Company's first report developed in preparation for the adoption of IFRS S1 and S2. Accordingly, no comparative information from prior periods is presented.

6.5 Trade-offs between risks and opportunities

S1.33(c)

Since the current reporting period represents the Company's first reporting cycle under IFRS S1 and S2, the Company is currently in a diagnostic and methodological alignment phase, focused on identifying sustainability-related risks and opportunities.

Consequently, a comprehensive quantitative assessment of the financial trade-offs between the sustainability-related risks and opportunities identified and disclosed in this report is not yet available. However, the Company has begun to incorporate these factors into its strategic and budgetary planning processes.

Currently, decision-making considers, among other aspects:

- The need to invest in mitigation or adaptation measures in response to environmental or regulatory risks;
- The effect of such investments on short-term financial performance; and
- The expected benefits in terms of operational resilience, risk reduction, and long-term value creation.

The Company is strengthening its internal information-gathering and financial analysis processes with the aim of progressively incorporating more detailed assessments of trade-offs between risks and opportunities into future planning cycles.

7. PROCESSES FOR THE IDENTIFICATION, ASSESSMENT, PRIORITIZATION, AND MONITORING OF SUSTAINABILITY-RELATED RISKS AND OPPORTUNITIES

S1.43(a)(b), S1.44(a)(i)(ii)(iii)(iv)(vi)(b)(c)

The Company has formal processes in place to identify, assess, prioritize, and monitor sustainability-related risks and opportunities, which are integrated into its corporate risk management framework and strategic planning processes. These processes take into account environmental, social, and governance factors that could affect the Company's financial position, financial performance, and value creation over the short, medium, and long term.

As part of these processes, the Company conducted a double materiality assessment to identify and prioritize its most relevant sustainability-related matters. This exercise considered the Company's own operations and its value chain, both the supply chain and the commercial value chain activities, and used widely adopted international standards as a reference. The assessment evaluated both impact materiality and financial materiality, taking into account the magnitude and probability of effects on variables such as revenue, costs, investments, liabilities, and enterprise value. For the purposes of this disclosure, only the financial materiality of sustainability-related risks and opportunities was considered.

The assessment was conducted using a structured methodology based on a combination of magnitude and probability, enabling consistent comparison across the topics evaluated. Financial probability takes into account both external factors and the management capabilities of the Company and its supply chain, including controls, policies, indicators, and supplier monitoring mechanisms.

The results of the assessment were reviewed by the ESG Committee and may be used to define priorities, allocate resources, and track sustainability-related risks and opportunities.

Sustainability-related risks and opportunities are managed as part of the Company's overall corporate risk management framework. To this end, the Company uses an internal Risk Assessment Model (*Modelo de Evaluación de Riesgos*) ("MER"), which allows the identification and assessment of operational, regulatory, financial, reputational, and sustainability-related risks using common criteria for magnitude, probability, and time horizon.

The results of the double materiality assessment and due diligence processes are integrated into this risk management system and form part of the oversight processes carried out by Senior Management and governing bodies.

Since this report represents the Company's first reporting cycle prepared under the IFRS sustainability disclosure standards, no changes in processes compared to prior periods are presented, in accordance with the transitional comparability provisions applicable to first-time adoption.

8. ENVIRONMENTAL RISKS AND OPPORTUNITIES

S1.29(c)(d)(e), S1.32(a)(b), S1.33(a), S1.35(a)(b)(c)(i)(ii)(d)(e), S1.36, S1.41, S1.42, S1.44(c), S2.3(a)(i)(b), S2.7, S2.9(a), S2.10(a)(b)(c), S2.11, S2.13–17, S2.15(a)(b), S2.16(a)(b)(c)(i)(ii)(d), S2.25 (a)(iv)(b)(c), S2.29(c)(d)(e), S2.30, S2.31, S2.32, S2.B4, S2.B5, S2.B6, S2.B7, S2.B8(a)(b), S2.B9, S2.B10, S2.B11, S2.B12, S2.B13, S2.B14, S2.B15, S2.B16

8.1 Risk 1. / Opportunity 1. Climate change adaptation

The Company operates in various geographic regions that may be exposed to climate-related physical risks, which represent a current financial risk for its own operations and for the supply chain. These risks include extreme weather events, temperature variations, droughts, floods, or other events that could affect production facilities, logistics, and the availability of agricultural raw materials. Because a significant portion of the Company's operations depends on agricultural sourcing and industrial facilities located in different geographies, certain climate-related events could result in cost variations, temporary disruptions, or the need for preventive investments. At the same time, the implementation of operational resilience measures, preventive maintenance, and resource-use efficiency represents a potential financial opportunity, as these actions may reduce future costs, mitigate operational losses, and decrease reliance on insurance coverage for climate-related events.

8.1.1 Effects on the business model and value chain

Exposure to climate-related risks is concentrated primarily within:

- The supply chain, due to dependence on agricultural raw materials subject to climatic conditions.
- The Company's own operations, particularly production and milling plants located in areas exposed to physical events.
- Logistics and distribution activities, where climate-related events could affect the continuity of supply to and from operations.

These factors may influence production costs, supply stability, and operational efficiency. However, as of the end of the reporting period and based on the information available, these anticipated effects are not expected to result in changes to the Company's business model or to the value chain structure.

8.1.2 Effects on strategy and decision-making

In the regions where it operates, GRUMA's strategy focuses on operational efficiency, preventive maintenance, resource optimization, and the reduction of operational risks. As part of this approach, the Company assesses and implements improvements in infrastructure, risk monitoring, facility maintenance, and efficiency programs that strengthen operational resilience.

If leveraged in a structured manner, these actions could be integrated into a formal climate change adaptation plan, which could help improve operational stability, optimize costs, and reinforce the Company's position as an efficient and responsible operator in the use of resources.

8.1.3 Effects on the current financial position

During the reporting period, the Company allocated U.S. \$15.71 million globally to the All-Risk Insurance Program, which includes coverage and assessments associated with fires, explosions, and climate-related events. In addition, resources were allocated to preventive maintenance and investments in facilities located in areas exposed to climate-related risks. This amount forms part of an ongoing process in which resource allocation is adjusted according to operational requirements and periodic assessment.

These expenses and investments have been integrated into the consolidated financial statements under the headings of operating expenses and property, plant and equipment, respectively.

The Company continues to assess the effects that climate change may have on its estimates, assumptions, and projections, as well as the effect it could have on its financial position and operating results. During 2025, the Company did not identify climate-related risks that could materially and adversely affect its operations. Likewise, the ESG strategies mentioned above did not have a material effect on the Company's financial position or operating results, and therefore there was no significant effect on the judgments and estimates used to prepare the Company's consolidated financial statements.

8.1.4 Anticipated effects on the financial position

Considering the time horizons used for the identification, assessment, and disclosure of sustainability-related and climate-related financial risks and opportunities, the Company anticipates that additional investments may be required in the short and medium term to maintain operational resilience, including infrastructure improvements, preventive measures, and efficiency projects.

In the long term, the Company believes that investments in adaptation measures may reduce the probability of operational disruptions, mitigate potential losses, and reduce the need to rely on insurance coverage, which could contribute to greater cost and cash flow stability in the event of a contingency. Additionally, efficiency improvements resulting from adaptation measures could generate indirect financial benefits and strengthen the Company's competitive position.

Among other factors, the Company considers regulatory changes relating to emissions that may entail additional compliance expenses; the possible implementation of carbon taxes, restrictions, or pricing mechanisms; traceability and certification requirements in the supply chain; the need for investment in energy efficiency and lower-emission technologies; as well as addressing the expectations of investors, customers, and financial institutions.

As a result of the factors described above, the Company anticipates an increase in cash outflows from investing activities, which will be reflected in the statement of financial position through a gradual increase in property, plant, and equipment.

8.1.5 Resilience to climate-related risks

S2.9, S2.15(a)(b), S2.17, S2.22(a)(i)(ii)(iii)(1)(2)(3)(b)(i)(1)(2)(3)(4)(5), S2.23, S2.29(c)(d), S2.B1(a)(b)(c), S2.B2(a)(b), S2.B3

Climate resilience Assessment: Physical risks

The Company has assessed its resilience to climate-related risks by considering the exposure of its operations to physical risks and the mitigation capacity in place as of the report date. As part of this process, the Company used the analysis conducted by the Insurer using the Climate Resilience Tracker tool, as of January 29, 2026, which assesses the exposure of facilities to climate-related physical risks, including wind, hail, flooding, structural collapse, and freezing.

This tool integrates the Insurer's data obtained through on-site technical assessments conducted by field engineers, natural hazard maps, and advanced analytical models that combine artificial intelligence and machine learning to estimate the frequency and severity of climate events and their potential effects on insured assets and operational continuity.

Of the total plants assessed, 33 are located in areas exposed to one or more of these risks. The exposed insured value, corresponding to the value of locations subject to Property Damage (PD) and Time Element (TE) losses, amounts to approximately U.S. \$5,190 million.

As of the date of the analysis, 25 active recommendations remain in place, aimed at strengthening facility resilience. Over the past years, the Company has implemented 29 recommendations, which has made it possible to reduce the estimated amount of climate risk by approximately U.S. \$177.89 million. The results of the analysis indicate that the implemented improvements help mitigate the financial risk associated with possible operational disruptions, asset damage, or production losses at identified exposed facilities.

The Company assessed the information provided by the Insurer considering, among other factors: the public and documented description of the methodology used, the consistent use of natural hazard maps and on-site technical assessments, and the periodic updating of data and analytical models.

Additionally, the Company considers that the Insurer has specialized technical experience in assessing physical risks to industrial assets, which is consistent with the specific purpose for which this information is used.

The Company believes that its current operating model maintains an adequate level of resilience to climate-related physical risks, subject to the continuity of maintenance measures, preventive investment, and risk monitoring.

8.1.6 Considered areas of uncertainty

S2.22(a)(ii)

The climate resilience assessment takes into account various sources of uncertainty inherent to the nature of climate-related risks and to the assumptions used in the technical analyses. The physical climate risk analysis is based on a methodology developed by the Insurer that combines data from engineering assessments conducted at visited locations, natural hazard maps, and predictive models based on artificial intelligence and machine learning. The analysis focuses exclusively on climate-related physical risks and does not include transition risks.

In particular, the following reference scenarios are considered:

- Low-concentration scenario (“RCP 2.6”), which assumes a significant reduction in emissions and a limited increase in global temperature.
- High-concentration scenario (“RCP 8.5”), which assumes a continued increase in emissions and greater climate-related physical effects.

These scenarios are used to estimate the future evolution of climate variables relevant to the Company's operations, considering the short-term horizon, through 2030, and the long-term horizon, through 2050, including:

- Average and maximum temperature
- Extreme precipitation over 24-hour and 5-day periods
- Drought indices and the number of consecutive days without precipitation
- Wind speed
- Risks associated with flooding and sea-level rise

Based on these projections, the Insurer's analysis identifies facility exposure, estimates expected losses associated with climate events, and establishes technical recommendations aimed at reducing the probability of property damage or business interruption. The prioritization of recommendations considers expected frequency of occurrence, potential severity, and the estimated effect on financial loss.

The areas of uncertainty considered in the assessment include, among others:

- Variability in the frequency and intensity of climate events under different future scenarios.
- Changes in climate models or in the assumptions, definitions, and/or criteria used to estimate expected losses.

Due to these uncertainties, the resilience assessment is based on the best information available as of the reporting date.

8.1.7 Consistency with the consolidated financial statements

Matters related to operational disruptions arising from natural disasters have historically been managed through the procurement of insurance coverage by the risk management area, with the objective of mitigating their effects.

These expenses and investments have been integrated into the consolidated financial statements under the headings of operating expenses and property, plant and equipment, respectively; accordingly, this section should be read in conjunction with the corresponding consolidated financial statements for the period from January 1 to December 31, 2025.

For 2025, the information used by the Insurer as an input to its Climate Resilience Tracker report is based on engineering assumptions, physical risk modeling, and climate scenario analysis. Based on these assumptions, inherent and actionable risks are identified, along with prioritized mitigation

recommendations and estimates of possible losses associated with property damage and business interruption.

The scope of this assessment does not directly incorporate internal accounting or financial judgments related to impairment testing of assets, estimates of useful lives, provisions and contingencies, or investment planning within the consolidated financial statements. These elements are not explicitly integrated with the assumptions, methodologies, or results derived from the climate assessments described above.

Where applicable, these factors are considered locally through budgeting processes, investment assessments, and risk management processes, in order to ensure operational continuity.

The Company continues to assess the effects that climate change will have on its estimates, assumptions, and projections, as well as the effects it could have on its financial position and results of operations. During the 2025 period, the Company did not identify climate-related risks that could materially and adversely affect its operations. Likewise, the ESG strategies described above did not have a material effect on the Company's financial position or results of operations, and therefore there was no significant effect on the judgments and estimates used to prepare the consolidated financial statements.

8.1.8 Risk and opportunity management

[S1.44\(c\)](#), [S2.24](#), [S2.25\(a\)\(i\)\(ii\)\(iii\)\(iv\)\(v\)\(b\)\(c\)](#), [S2.29 \(e\)](#)

The ESG Committee oversees the Company's sustainability strategy, including environmental performance, emissions reduction, energy efficiency, and the assessment of investments and expenses. For additional information, see Section 5, Sustainability Governance, of this report.

The environmental guidelines and principles implemented by the Company are set out in the International Environmental Management Policy, applicable to all GRUMA business units and approved by the Chief Operating Officer. Each Business Unit or Responsible Division is accountable for its implementation, in accordance with the Company's internal regulatory framework and the applicable environmental legislation in the countries where it operates.

The Company systematically implements the technical recommendations issued, aimed at strengthening asset resilience, reducing the probability of physical damage, and mitigating possible operational disruptions. These actions include infrastructure and operational enhancements and specific protective measures at sites with greater exposure. The amounts associated with these recommendations form part of an ongoing process in which resource allocation is adjusted according to operational needs and periodic assessment.

This approach not only enables the Company to manage risk but also to capitalize on financial opportunities by reducing the probability of losses arising from property damage and business interruption events, as well as by optimizing costs associated with insurance premiums, deductibles, and remediation expenses. In this regard, integrating physical resilience criteria into operational and investment decision-making helps protect asset value and strengthen business continuity over the short, medium, and long term.

8.1.9 Metrics and targets

S2.27, S2.28 (a)(b)(c), SASB FB-PF-000.B

As of the end of the reporting period, the Company is addressing the Insurer's recommendations regarding improvements to facilities located in areas exposed to climate-related physical risks.

The results of the Climate Resilience Tracker tool for 2025 show that 33 of the Company's facilities are located in areas exposed to climate-related events, with 25 active recommendations and 29 implemented recommendations over the past few years.

8.2 Risk 2. Climate change mitigation

S2.3(a)(ii), S2.29(b)(f), S2.30, S2.B64, S2.B65(a)(b)(c)(d)(e)

The Company is exposed to transition risks related to climate change, arising mainly from increasing regulations, reporting standards, decarbonization requirements, and investor and customer expectations regarding emissions reduction. These risks include the possible adoption of new regulatory obligations, taxes, or restrictions related to emissions, as well as stricter disclosure requirements in the various jurisdictions where the Company operates. Additionally, the need to demonstrate supply chain traceability and compliance with environmental criteria, including the prevention of deforestation or the responsible use of agricultural raw materials, could entail higher monitoring, certification, and due diligence costs.

Exposure to these factors may generate variations in operating costs, investment requirements, and adjustments to production or logistics processes in order to comply with new market conditions.

8.2.1 Effects on the business model and value chain

Climate change mitigation risks may affect various stages of the value chain, including:

- The supply chain, due to traceability, environmental certifications, and regulatory compliance requirements in agricultural sourcing.
- The Company's own operations, due to possible regulatory obligations related to emissions, efficiency, or climate-related reporting.
- Logistics and distribution, due to regulatory changes relating to transportation or costs associated with environmental compliance.
- The commercial chain, due to customer, retailer, or market requirements for climate-related information or sustainability criteria necessary to maintain business relationships.

These factors could influence production costs, access to certain markets, and the need to implement additional control, compliance, and reporting systems. In 2025, these did not result in modifications to the Company's business model or the structure of its value chain.

8.2.2 Effects on strategy and decision-making

As part of its strategic planning, risk management, and capital allocation processes, the Company also takes climate-related transition risks into account. As a part of this approach, applicable regulatory requirements, international disclosure standards, and market expectations are

continuously assessed in order to anticipate potential changes and reduce exposure to contingencies.

The strategy includes strengthening monitoring systems, enhancing internal controls, developing reporting capabilities, and assessing measures that make it possible to maintain regulatory compliance and operational continuity in various markets where the Company operates.

These actions are intended to limit exposure to sanctions, trade restrictions, or additional costs arising from the transition to lower-emission economies.

8.2.3 Effects on the current financial position

During the reporting period, the Company allocated U.S. \$1.11 million to expenses associated with compliance with regulatory requirements, the development and strengthening of reporting systems, emissions assessments, supply chain due diligence processes, and the engagement of technical advisory services for compliance with environmental standards. These expenses form part of the Company's ordinary operations and have been integrated into the income statement under the heading of operating expenses.

8.2.4 Anticipated effects on the financial position

The Company is exposed to transition risks related to climate change, arising from the strengthening of regulatory frameworks, increased disclosure requirements, and growing expectations from investors, customers, and authorities regarding the management of greenhouse gas emissions. Among the most relevant regulatory changes, including but not limited to the following, are: in California, the Climate Corporate Data Accountability Act (SB 253), which establishes mandatory emissions disclosure, and the Climate-Related Financial Risk Act (SB 261), which requires periodic reporting on climate-related financial risks; in the European Union, the Corporate Sustainability Reporting Directive ("CSRD") and the Deforestation-Free Products Regulation (*Reglamento sobre productos libres de deforestación*), which increase traceability and due diligence requirements; in Mexico, amendments to the General Provisions Applicable to Securities Issuers (*Circular Única de Emisoras*) ("CUE"), which introduce mandatory sustainability disclosure requirements, as well as the Sustainable Taxonomy, which influences financial system expectations regarding activities aligned with environmental objectives; as well as new sustainability reporting obligations in markets such as the United Kingdom and China. These changes may entail higher compliance costs, investments in measurement and control systems, and increased transparency requirements across the value chain, which could affect operating costs, access to certain markets, and financing conditions over different time horizons.

8.2.5 Risk management

S1.44(c), S2.25(a)(i)(ii)(iii)(iv)(v)(b)(c)

The Company manages climate change mitigation risk through the implementation of initiatives focused on improving energy efficiency and emissions reduction in its operations. This approach is complemented by research and development activities led through its subsidiaries Investigación Técnica Avanzada, S.A. de C.V. ("INTESA") and Constructora Industrial Agropecuaria, S.A. de C.V. ("CIASA"), aimed at technological innovation and continuous process improvement.

Additionally, when necessary, the Company invests in the acquisition and modernization of equipment using more efficient and lower-emission technologies. On a cross-cutting basis, production plants systematically monitor energy consumption and implement operational actions that help optimize energy use and reduce associated emissions.

As part of its strategy, since 2023 the Company has acquired Renewable Energy Certificates (“RECs”) as a mechanism to offset indirect emissions. As of the end of the 2025 period, 43.6% of the Company's electricity consumption had been offset through the acquisition of 335,096 RECs, equivalent to 126,283 tCO₂e. These certificates are acquired after the consumption period; in this case during 2026 to offset 2025 electricity consumption. However, this strategy is under review in light of the volatility observed in the pricing of this instrument.

8.2.6 Metrics and targets

S2.29(a)(i)(ii)(iii)(iv)(v), S2.B23, S2.B24, S2.B26(a)(c), S2.B27(a)(b), S2.B29, S2.B30, S2.B31
SASB: FB-AG-110a.1, FB-AG-110a.2

As of the end of the reporting period, the Company's implementation of operational efficiency improvements, REC acquisitions, and research and development has resulted in an average annual reduction of 3.7% in its Scope 1 and Scope 2 emissions since 2019 (the baseline year; subject to possible changes in future disclosures).

The Company's emissions are reported using the operational control approach and the activity-based measurement approach, in accordance with the Greenhouse Gas Protocol (“GHG Protocol”). The emission factors used for 2025 are those applicable to each country in which the Company operates, where information is available. Otherwise, the factor suggested by the GHG Protocol, based on IPCC guidelines, is used. The data presented follows both the location-based and market-based approaches.

Emissions

	Year ended December 31, 2025				
	Net Sales In millions of US dollars	Production Tons ⁸	GHG Emissions (tCO ₂ eq)		
			Scope 1	Scope 2	Scope 2
				<i>Location - Based</i>	<i>Market - Based</i>
Gruma USA	3,447	1,562,889	212,724	115,349	43,747
GIMSA	1,735	2,138,578	344,400	112,644	90,911
Gruma Europe	511	361,025	21,530	16,804	6,793
Gruma Central America	397	258,000	42,639	13,613	5,639
Gruma Asia and Oceania	281	105,386	9,652	35,054	22,152
Other subsidiaries and eliminations	4	147,953	33,887	15,382	15,382
Total	U.S.\$ 6,375	4,573,831	664,833	310,147	185,925

⁸ Scope 1 and Scope 2 emissions intensity is calculated based on tons of production.

8.3 Risk 3. Energy.

S1.29(a)(b)(c)(d)(e), S1.30(a)(b), S1.32(a)(b), S1.33(a), S1.34(a)(b), S1.35(a)(b)(c)(i)(ii)(d)(e), S1.36, S1.41, S1.43(a)(b), S1.45, S1.46(a)(b)(i)(ii), S1.48
SASB: FB-AG-110a.3, FB-AG-130a.1, FB-PF-130a.1

The Company is exposed to energy management-related risks as part of the climate-related transition risks, to the extent that the tightening of regulatory frameworks, emissions reduction commitments, and evolving market expectations increase the need to use more efficient and lower-emission energy sources. This risk is closely linked to the climate change mitigation risk, since energy consumption represents one of the primary drivers of emissions in the Company's operations and value chain.

In the markets where the Company operates, the limited availability of lower-emission energy sources, as well as restrictions in infrastructure or energy markets, may hinder the transition toward cleaner energy alternatives, which could result in increased production, processing, and logistics costs, as well as additional investment requirements to comply with new regulatory provisions or market standards.

8.3.1 Effects on the business model and value chain

Energy-related risks may affect different stages of the value chain, including sourcing, the Company's own operations, transportation, and distribution, as they form a significant part of the Company's operating cost structure.

Changes in energy prices, limitations in access to lower-emission sources, or new regulatory obligations may influence operating costs and product competitiveness. Likewise, the energy and emissions intensity of the Company's operations may influence the relationship with customers, investors, and authorities, particularly in markets with stricter environmental requirements. In 2025, these effects did not result in changes to the Company's business model or to the structure of its value chain.

8.3.2 Effects on strategy and decision-making

The Company takes energy-related risks into account within its strategic planning, risk management, and capital allocation processes, continuously assessing regulatory developments, market conditions, and the availability of energy sources.

As part of this approach, measures aimed at improving energy efficiency, optimizing resource consumption, and strengthening regulatory compliance are analyzed, as well as the possible adoption of market instruments or technologies that may reduce the energy intensity of operations. These decisions are intended to limit exposure to cost increases, regulatory sanctions, or operational restrictions arising from the transition to lower-emission economies.

8.3.3 Effects on the current financial position

During the reporting period, the Company incurred expenses and investments related to energy supply, compliance with regulatory provisions, the acquisition of instruments associated with lower-emission energy, and the implementation of energy efficiency measures.

These expenses are considered part of the Company's ordinary operations and have been integrated into the consolidated financial statements under the headings of operating expenses and property, plant and equipment, respectively.

8.3.4 Anticipated effects on the financial position

Over the short, medium, and long term, the Company anticipates that evolving regulations, market conditions, and the availability of lower-emission energy sources could require additional investments in efficiency initiatives, technological substitution, equipment modernization, or market instruments, which could increase CAPEX or OPEX in certain periods. In addition, the energy and emissions intensity of operations may influence the risk perception among investors and financial institutions, which could affect financing conditions, the cost of capital, or access to resources in certain markets.

Among the main initiatives currently underway are:

- **Renewable Energy Certificates ("RECs"):**
Since 2023, the Company has acquired Renewable Energy Certificates as a mechanism to offset indirect emissions associated with electricity consumption, enabling the reduction of Scope 2 emissions under a market-based approach.
- **Cogeneration projects in Mexico:**
Electricity cogeneration projects have been approved to improve energy efficiency at production plants, optimizing fuel use, and reducing emissions intensity per unit produced.
- **Solar panel installations:**
Solar energy projects are being considered, both in Mexico and in other regions, with the aim of increasing the use of renewable energy sources within their operations.
- **Operational efficiency and technological modernization:**
On a cross-cutting basis, operations implement energy efficiency measures, including systematic monitoring of energy consumption, process optimization, and investment in equipment and technologies with lower energy and emissions intensity.

The Company anticipates that, should these initiatives currently underway materialize, they could result in a gradual increase in operating expenses and capital investments associated with these activities. The expenses would be recognized in the income statement and, given their recurring nature, would be reflected in cash flows from operating activities; the capital investments would increase the property, plant and equipment line item in the statement of financial position and would be reflected in cash flows from investing activities.

8.3.5 Risk management

S1.44(c)

As described under risk 8.2 *Climate change mitigation*, the Company implements ongoing energy efficiency initiatives as part of its operational processes, which translates into reduced energy consumption and the use of renewable or lower-emission energy sources when available.

8.3.6 Metrics and targets

S1.49, S1.50, S1.51, S1.52, S1.53, S2.33–S2.36

As of the end of the reporting period, the Company continues to implement actions to mitigate risks associated with energy management. These include the acquisition of Renewable Energy Certificates (“RECs”) and fuel efficiency improvements resulting from the continuous optimization of manufacturing processes. In addition, the Company has begun upgrading certain vehicles, primarily in the United States of America. It also implements electrical efficiency measures that reflect gradual progress in facility modernization and operational practices.

Data are reported in GJ (gigajoules) in accordance with ISSB’s international sustainability reporting standards for the processed foods industry. They include information for 75 production plants⁹ and the transportation fleet of the Company’s own operations.

Non-renewable fuel consumption

Source	2025
	(GJx10 ⁶)
Natural gas	10.7759
LP gas	0.8792
Gasoline	0.0861
Diesel	0.0523
Bunker	0.0045
Total (GJx10⁶)	11.7979

Total electricity consumption from non- renewable sources

Source	2025
	(GJx10 ⁶)
Fossil fuels	1.5060
Total (GJx10⁶)	1.5060

Total electricity consumption from renewable sources

Source	2025
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⁹ For reporting purposes, information is collected from plants that were productive under the Company’s operational control and throughout the entire reporting period, for 2025, this criterion includes information from 75 plants.

	(GJx10⁶)
Solar	0.1602
Eolic	1.0186
Hydroelectric	0.0311
Other	0.0383
Total (GJx10⁶)	1.2482

<i>Total energy consumption in 2025</i>	
Total (GJx10⁶)	14.5521

8.4 Risk 4. Water consumption.

S1.29(a)(b)(c)(d)(e), S1.30(a)(b), S1.32(a)(b), S1.33(a), S1.34(a)(b), S1.35(a)(b)(c)(i)(ii)(d)(e), S1.36, S1.41, S1.43(a)(b), S1.45, S1.46(a)(b)(i)(ii), S1.48
SASB: FB-AG-140a.1, FB-AG-140a.2, FB-PF-140a.1, FB-PF-140a.3

The Company is exposed to risks associated with water consumption within its own operations, as well as throughout its supply chain, arising from growing pressure on water resources' availability in certain regions where production facilities and agricultural suppliers are located. This is considered a potential financial risk that may affect operational continuity through cost increases or disruptions to the supply of raw materials, as well as restrictions on access to the water required for industrial processes.

This risk relates to water-stress conditions, increased variability in resource availability, and possible changes in regulations or water extraction concessions, which could require operational adjustments or additional investments to secure the supply of this resource. Although the Company has implemented measures to reduce its exposure, such as optimizing water consumption and diversifying raw material sourcing, the evolution of climate and regulatory conditions keeps this matter as a relevant area for monitoring.

8.4.1 Effects on the business model and value chain

Water consumption is necessary for milling and production operations, therefore, local limitations on its availability can primarily affect the Company's own operations and, to a lesser extent, agricultural sourcing in the supply chain.

Restrictions on water permits, reductions in availability, or increases in water costs may influence the implementation of new measures to promote operational efficiency, production scheduling, and the cost structure, particularly at facilities located in regions with greater water stress. In 2025, these effects did not result in changes to the Company's business model or to the structure of its value chain.

8.4.2 Effects on strategy and decision-making

The Company takes water-related risk into account within its operational planning and risk management processes, assessing water availability in the regions where it operates and adopting

measures to ensure operational continuity. These measures include improving water consumption efficiency, preparing contingency response plans, using alternative raw material suppliers (primarily corn) when necessary, and assessing investments intended aimed at continuous improvement. These actions seek to limit exposure to operational disruptions and substantial cost increases.

8.4.3 Effects on the current financial position

During the reporting period, the Company incurred expenses and investments related to water supply and the implementation of water consumption efficiency measures.

These expenses are considered part of the Company's ordinary operations and have been integrated into the consolidated financial statements under the headings of operating expenses and property, plant and equipment, respectively.

8.4.4 Anticipated effects on the financial position

Over the short, medium, and long term, the Company considers that water availability and evolving regulatory requirements could require additional investments in efficiency initiatives, infrastructure, or water storage within its own operations, or increase the diversification of alternative corn supply sources, which could increase OPEX or CAPEX in certain geographies. Under scenarios of greater water stress, increases in water acquisition costs or temporary operational restrictions could occur, which could affect production at specific facilities and, consequently, the Company's cash flows.

The Company anticipates that, should these initiatives currently underway materialize, they could result in a gradual increase in operating expenses and capital investments associated with these activities. The expenses would be recognized in the income statement and, given their recurring nature, would be reflected in cash flows from operating activities; the capital investments would increase the property, plant and equipment line item in the statement of financial position and would be reflected in cash flows from investing activities.

8.4.5 Application of scenarios for identifying water-related risks

To identify water-related risks and opportunities, the Company applies a dual-perspective approach that includes:

1. Physical risk assessment at production plants through the Insurer.

Consistent with the methodology used for climate risk assessment, the Insurer conducted a 100-year risk modeling analysis to assess water-related physical risks at production plants, considering the 2025 and 2030 time horizons. This assessment identified 33 plants exposed to climate-related risks, including flooding, droughts arising from extreme temperatures, sea level rise, and extreme precipitation. The analysis provides a forward-looking view of the possible effects on the continuity and resilience of the plants, taking into account expected financial loss.

2. Watershed-level risk assessment using WRI Aqueduct.

The Company uses the WRI Aqueduct platform to assess watershed-level related risks in the various regions where it operates. This tool enables the identification of areas with water stress, understood as situations in which water demand exceeds available supply or in which water quality limits its use. A high level of water stress can affect both operational continuity and water availability for the Company's own operations, surrounding communities, and ecosystems. As a result of this analysis, as of the end of the reporting period, 36 production plants were identified in areas of high or extremely high-water stress. Of these facilities, 16 are located in the United States of America, 15 in Mexico, 2 in Spain, and 3 each in China, Australia, and Turkey, respectively.

8.4.6 Risk management

S1.44(c)

The Company implements continuous improvement and water efficiency measures as part of its ordinary operations. The nixtamalization process developed by the Company is more efficient than traditional methods and has achieved a 66% reduction in water consumption during its cooking processes, decreasing from 5.07 m³ per ton of corn to 1.72 m³ per ton.

To address regional water scarcity, the Company develops self-sufficiency solutions for wastewater treatment and reuse. This includes the installation of oxidation ponds, together with agricultural land for irrigation with treated water. It uses techniques such as hydraulic screening, centrifugation, hydrolysis, anaerobic and aerobic fermentation, and clarification processes. A "compact" process is also used, which includes treatment equipment such as tank-type anaerobic and aerobic fermentation reactors, clarifiers, and centrifugal separators, to discharge treated water into the municipal sewage system.

Additionally, based on the results of the Insurer's analyses, by the end of the reporting period, the Company had implemented actions at facilities identified as having the highest water risk. These actions, ranging from minor improvements to larger-scale infrastructure upgrades, include the installation of temporary flood protection systems, the execution of preparedness protocols for climate-related events, and repairs and reinforcement to critical equipment and facilities, among others.

8.4.7 Metrics and targets

S1.49, S1.50, S1.51, S1.52, S1.53, S2.33–S2.36
SASB: FB-AG-140a.1, FB-PF-140a.1

As of the end of the reporting period, the Company has targets for compliance with local and national regulations and allocates resources to conserve water through process optimization and the modernization of equipment used for water extraction and discharge. In 2025, the Company allocated U.S. \$7.01 million to projects aimed at improving efficiency, recycling, and the sustainable use of water. As a result of these practices, a 5% reduction in water withdrawals was achieved compared to 2024, while maintaining similar production levels.

Metrics are reported in cubic meters, in line with ISSB sustainability reporting standards for the processed foods industry.

Total water withdrawals in m³

Sources	2025
Surface water	700,476.00
Municipal supply	2,677,975.22
Renewable groundwater	3,798,221.53
TOTAL	7,176,672.75

Total water discharges in m³

Destination	2025
Irrigation water	2,317,467.22
Surface water	160,329.00
Municipal network	1,123,246.26
Water for third-party usage	122,470.00
TOTAL	3,723,512.48

Water consumption in water-stressed areas in 2025, in m³

	Withdrawal	Discharges	Consumption
Water use in arid areas	30,694.00	23,347.00	7,347.00
Extremely High (>80%)	3,531,245.03	1,869,989.99	1,661,255.04
High (40-80%)	509,762.40	186,388.59	323,373.81
TOTAL	4,071,701.43	2,079,725.58	1,991,975.85

SASB: FB-AG-440a.2

In 2025, water withdrawals at facilities located in areas of high and extremely high-water stress accounted for 56.74% of total withdrawals.

	2025	% vs total
Withdrawals (m ³)	4,071,701.43	56.74%
Total production (tons)	2,632,098.74	57.55%

8.5 Risks 5. and 7., and Opportunities 2. and 3.

Risk 5. Climate change (direct drivers of biodiversity loss)

Risk 7. Dependence on ecosystem services

Opportunity 2. Farmer engagement

Opportunity 3. Sustainable agriculture practices

S1.29(a)(b)(c)(d)(e), S1.30(a)(b), S1.32(a)(b), S1.33(a), S1.34(a)(b), S1.35(a)(b)(c)(i)(ii)(d)(e), S1.36, S1.41, S1.43(a)(b), S1.45, S1.46(a)(b)(i)(ii), S1.48, SASB: FB-PF-440a.2, FB-AG-440a.1.

The Company is exposed to risks associated with the effects of climate change and the degradation of natural systems that support agricultural production, which may influence the availability, quality, and cost of raw materials used in its operations. These factors are considered a potential financial risk over the medium and long term, as changes in climatic conditions, soil degradation, biodiversity loss, deforestation, and increased variability in agricultural yields may affect the stability of the supply of key inputs such as corn and wheat.

In addition, the supply of raw materials such as corn depends on natural conditions that directly influence agricultural productivity, such as water availability, soil fertility, climate stability, and natural pest control. The degradation of these conditions, as well as the increasingly strengthening of environmental regulations related to land use, deforestation, traceability, or supply chain due diligence, may result in increases in production costs and possible restrictions on operating in certain markets.

At the same time, the Company identifies a strategic opportunity in strengthening agricultural resilience through direct engagement with suppliers and the promotion of more sustainable production practices, which may contribute to stabilizing supply, reducing cost volatility, and improving the predictability of cash flows over the long term.

8.5.1 Effects on the business model and value chain

These risks and opportunities are concentrated primarily within the supply chain, due to the Company's reliance on agricultural raw materials produced by third parties, whose availability is subject to climatic conditions, soil quality, agricultural practices, and compliance with environmental regulations. Soil degradation, deforestation in producing regions, lower crop yields, or regulatory changes may affect supply stability and result in variations in input procurement costs.

Conversely, strengthening relationships with farmers, improving traceability, and adopting more sustainable agricultural practices may contribute to reducing exposure to supply disruptions and improve compliance with regulatory and market requirements. In 2025, these effects did not result in changes to the Company's business model or to its value chain structure.

8.5.2 Effects on strategy and decision-making

The Company considers these factors within its strategic planning and risk management processes, assessing the stability of sourcing regions, the performance of agricultural suppliers, and the

evolution of regulations related to sustainability, deforestation, and traceability. As part of this approach, actions are promoted to strengthen engagement with farmers, improve supply chain monitoring processes, and foster agricultural practices that contribute to maintaining productivity and supply stability over time.

These actions include technical advisory services, purchase agreements, improvements in post-harvest practices, strengthened traceability controls, and support for the adoption of more efficient agricultural practices, with the objective of reducing exposure to supply risks and substantial cost increases.

8.5.3 Effects on the current financial position

During the reporting period, the Company incurred expenses related to supplier monitoring, compliance with regulatory requirements, supplier development programs, and initiatives aimed to strengthen supply chain resilience, which are part of the Company's ordinary course of business and have been integrated into the income statement under the heading of operating expenses.

8.5.4 Anticipated effects on the financial position

Over the medium and long term, the degradation of agricultural conditions, the tightening of environmental regulations, or greater climate variability could result in increases in agricultural raw material costs, require changes in sourcing regions, or additional investments to secure supply continuity.

Conversely, strengthening more sustainable agricultural practices and increasing engagement with suppliers may improve supply stability and reduce exposure to regulatory or market risks.

The Company anticipates a gradual increase in operating expenses associated with these activities, which would be recognized in the income statement and, given their recurring nature, would be reflected in cash flows from operating activities.

8.5.5 Risk and opportunity management

S1.44(c)

SASB: FB-PF-440a.2, FB-AG-440a.1

During the reporting period, the Company strengthened its capacity to identify and mitigate the risks described above through projects that link sustainable practices with measurable field-level outcomes, such as its collaboration with the International Maize and Wheat Improvement Center (*Centro Internacional de Mejoramiento de Maíz y Trigo*) ("CIMMYT") in Mexico. This project is designed to generate positive impacts on soil health and producers' livelihoods while reducing climate-related and biodiversity-related risks.

The following components have been identified as priorities:

- Soil health: measurement of organic matter content to assess soil fertility and resilience.
- Climate change: estimation of CO₂eq emissions per ton of grain using methodologies aligned with IPCC models.

- Efficient water use: monitoring of water withdrawal and consumption in irrigation and production systems.
- Biodiversity: monitoring the responsible use of pesticides and promoting efficient nitrogen application practices to reduce environmental impacts.
- Livelihoods: assessment of agricultural profitability and productivity to ensure sustainable conditions for farmers.

In the United States of America, Azteca Milling, L.P. (“AMLP”) works to strengthen ties with its suppliers and implement structured sustainability programs with corn producers. These initiatives provide a clear understanding of current practices, allow baselines to be established, and make it possible to measure and accelerate progress toward climate, water, soil, and biodiversity targets. In 2024, AMLP conducted its first Sustainability Survey with contracted corn producers. The process combined visual assessments with detailed interviews to obtain quantitative and qualitative information regarding agricultural practices, yields, and operating conditions. In 2025, 178 of 250 producers were assessed on categories such as soil health, irrigation water use and efficiency, fertilizer and pesticide application, biodiversity, and overall farm management.

8.5.6 Metrics and targets

[S1.49](#), [S1.50](#), [S1.51](#), [S1.52](#), [S1.53](#), [S2.33–S2.36](#)

The Company is currently in the process of defining its operational baseline, with a priority focus on Mexico and the United States of America, in order to have robust and comparable information that will make it possible, at a later stage, to set specific targets for each phase of its projects.

At the close of the reported period, through the Agricultural Sourcing area in Mexico, the Company has established the following targets, on which it works in collaboration with CIMMYT: (i) assessing the sustainability level of its supplier base using the CIMMYT model; (ii) increasing the sustainability level of the supplier base through training and knowledge transfer; (iii) promoting the adoption of sustainable agricultural practices that optimize input use and reduce environmental impacts; and (iv) ensuring technical support through certified specialists.

In addition, the Company seeks to integrate producers of native Mexican high-plateau heirloom blue corn (*maíz azul nativo criollo del Altiplano de México*), who meet quality requirements, into the blue corn flour production chain.

In the United States of America, AMLP launched an irrigation efficiency initiative. This project assessed irrigation practices, including gravity, pivot, and drip irrigation, at certain supplier farms, and identified opportunities to transition toward more efficient technologies.

Pilot projects will test alternative irrigation methods in areas with high water stress, collecting data on baseline withdrawals, application efficiency, and yield response per unit of water.

Component	Indicator	Baseline / Current Status	Target
Farmer Participation	Farmers surveyed on sustainability criteria	178 suppliers assessed out of 250	100% of supplier farmers engaged
Soil Health	Adoption of conservation tillage	Baseline survey results: 60% of respondents with conservation tillage adoption	40% adoption at AMLP farms
Water Use	Irrigation project (new initiative)	Baseline assessment completed in 2024	Full implementation in 2025
Biodiversity	Pollinator and habitat support practices	Some farms are already participating	Reach all suppliers by 2030

8.6 Risk 6. Invasive alien species - Regulation related to the use of genetically modified corn

S1.29(a)(b)(c)(d)(e), S1.30(a)(b), S1.32(a)(b), S1.33(a), S1.34(a)(b), S1.35(a)(b)(c)(i)(ii)(d)(e), S1.36, S1.41, S1.43(a)(b), S1.45, S1.46, S1.48
SASB: FB-PF-260a.2, FB-AG-430b.1

The Company is exposed to potential risks associated with regulatory compliance related to genetically modified organisms (“GMOs”) or contaminants in agricultural raw materials, primarily corn, which could affect its operating results, regulatory compliance, and product acceptance in different markets. This is considered a potential financial risk within the Company’s own operations and in the supply chain, over the short, medium, and long term, since the Company relies on external suppliers for the sourcing of grains and agricultural inputs that must comply with strict regulatory requirements regarding food safety, traceability, approval for human consumption, and biodiversity protection.

All corn purchased must be suitable for nixtamalization, approved for human consumption, and compliant with applicable regulations in each country where the Company's products are sold. To reduce the risk of non-compliance, control protocols have been established to analyze and monitor the presence of GMOs, biological or chemical contaminants, and other factors that could affect input quality; however, there is a risk that non-conforming raw materials could inadvertently be incorporated into production processes.

Likewise, regulatory changes related to the use of genetically modified corn, import restrictions, or new labeling requirements could result in additional costs or require modifications to the supply chain.

8.6.1 Effects on the business model and value chain

This risk is concentrated within the supply chain and the Company’s own operations, since the quality and regulatory compliance of raw materials directly affect production processes, product certification, and access to certain markets.

The inadvertent incorporation of non-conforming inputs could affect operations, generate additional costs, limit commercialization in certain regions, or affect consumer perception, which could influence product demand and financial performance. In 2025, these effects did not result in changes to the Company's business model or to the structure of its value chain.

8.6.2 Effects on strategy and decision-making

To mitigate these risks, the Company maintains quality controls upon receipt of raw materials, monitoring programs, supplier audits, and collaboration with technical institutions and authorities to improve agricultural practices. In markets where regulations require control over products containing GMOs, the Company applies a selective sourcing strategy with suppliers capable of meeting the applicable regulatory requirements of the region.

8.6.3 Effects on the current financial position

During the reporting period, the Company incurred expenses related to selective sourcing controls, quality, laboratory testing, certifications, contaminant monitoring, and agricultural improvement programs, which are part of ordinary operating costs.

8.6.4 Anticipated effects on the financial position

Over the short, medium, and long term, the Company anticipates that it will be necessary to maintain investments in controls, certifications, monitoring, and supply chain improvement programs, which could increase operating costs.

In addition, regulatory changes related to genetically modified organisms, food safety, or trade restrictions could require modifications to sourcing processes, result in higher compliance costs, or limit access to certain markets. In adverse scenarios, non-compliance events could lead to sanctions, product recalls, litigation, or reputational effects that could affect sales and financial results.

Nevertheless, the Company believes that, with the controls currently in place, this risk remains effectively managed, although situations could arise that could lead to variations in operating costs over different time horizons.

8.6.5 Risk management

S1.44(c)

To mitigate these risks, the Company maintains quality controls upon receipt of raw materials, monitoring programs, supplier audits, and collaboration with technical institutions and authorities to improve agricultural practices. In markets where regulations require control over products containing GMOs, the Company applies a selective sourcing strategy with suppliers capable of meeting the applicable regulatory requirements of the region.

8.6.6 Metrics and targets for GMO risk mitigation

S1.49, S1.50, S1.51, S1.52, S1.53

The Company keeps this risk managed through the actions described in section 8.6.5. In 2025, the cost of corn that complied with both the Company's quality standards and the applicable regulations in each of the regions where it operates remained stable.

9. SOCIAL RISKS AND OPPORTUNITIES

9.1 Risk 8. Health and safety in own operations

S1.29(a)(b)(c)(d)(e), S1.30(a)(b), S1.32(a)(b), S1.33(a), S1.34(a)(b), S1.35(a)(b)(c)(i)(ii)(d)(e), S1.36, S1.41, S1.43(a)(b), S1.45, S1.46, S1.48
SASB: FB-AG-320a.1

The Company is exposed to risks related to the health and safety of employees within its operations, arising from the possibility of workplace incidents associated with failures in safety management systems, operational errors, or working conditions that could affect employee well-being. This is considered a current financial risk that may arise across all time horizons, given that industrial operations require the use of machinery, continuous production processes, and activities that involve inherent risks.

9.1.1 Effects on the business model and value chain

Health and safety risks are primarily concentrated within the Company's own operations, where workplace incidents could affect production continuity, personnel availability, and compliance with internal and regulatory standards.

Relevant safety events could result in partial or total disruptions to the operation of certain facilities, affect production efficiency, or influence the ability to meet quality, food safety, or certification requirements necessary to operate in certain markets. In 2025, these effects did not result in changes to the Company's business model or to the structure of its value chain.

9.1.2 Effects on strategy and decision-making

The Company considers occupational health and safety as part of its risk management and operational control processes, maintaining prevention, training, and oversight systems aimed at reducing the probability of incidents.

Decisions related to investments in equipment, maintenance, training, and process improvements take into consideration the potential effect that safety-related events could have on operational continuity, regulatory compliance, and corporate reputation.

These actions are intended to limit exposure to sanctions, operational disruptions, or additional costs arising from workplace incidents.

9.1.3 Effects on the current financial position

During the reporting period, the Company incurred expenses related to safety programs, training, regulatory compliance, insurance, and occupational healthcare

These expenses form part of the Company's ordinary operations and have been integrated into the income statement under the heading of operating expenses.

9.1.4 Anticipated effects on the financial position

Over the short, medium, and long term, the Company anticipates that maintaining safe operating conditions will require ongoing spending on training, maintenance, control systems, and regulatory compliance. In scenarios where relevant incidents occur, there could be increases in labor costs, insurance premiums, regulatory sanctions, or operational disruptions, which could temporarily affect the cash flows of certain cash-generating units.

Likewise, significant safety-related events could influence risk perceptions among customers, investors, or authorities, particularly in markets that require compliance with stringent occupational safety standards or industrial certifications.

The Company anticipates a gradual increase in operating expenses associated with these activities, which would be recognized in the income statement and, given their recurring nature, would be reflected in cash flows from operating activities

9.1.5 Risk management

[S1.44\(c\)](#)

The Company recognizes that occupational health and safety represent a relevant management factor within industrial environments and, by their nature, requires ongoing attention across all operations. Through internal oversight processes, dialogue with personnel, and external audits, the Company has identified areas for improvement related to the installation or upgrading of fire prevention and suppression systems, the enhancement of fall protection measures, the correction of unsafe access points in certain operational areas, and the reinforcement of perimeter controls at certain facilities, among other matters related to employee physical safety. To manage these risks, the Company maintains a comprehensive global Health, Safety, and Environment framework applicable across all operations, consisting of corporate policies, operational procedures, and regional guidelines aimed at incident prevention, timely response to events, and continuous improvement of working conditions. This framework establishes consistent criteria for occupational safety management and seeks to ensure operational continuity, regulatory compliance, and employee protection at all production sites.

9.1.6 Metrics and targets

[S1.49](#), [S1.50](#), [S1.51](#), [S1.52](#), [S1.53](#)

To monitor the effectiveness of health and safety programs and support continuous improvement, the Company tracks a series of indicators across all regions and operational sites. These metrics enable it to assess performance, identify risk areas, and implement targeted actions that protect the workforce and promote a culture of prevention.

The Company aims to maintain its Lost Time Incident Rate (“LTIR”) below 2.0 globally. As of the end of the reporting period, the LTIR was 1.2, meeting the Company’s commitment to the health and safety of its employees.

Incident and accident frequency rates

SASB: FB-AG-320a.1.

	2025
Serious work-related incidents	342
Days lost due to workplace accidents	10,155
LTIR - Lost Time Incident Rate	1.2
Fatalities	0

9.2 Risk 10. Access to water and sanitation (affected communities)

S1.29(a-e), S1.30(a)(b), S1.32(a)(b), S1.33(a), S1.34 (a)(b), S1.35(a)(b)(c)(i)(ii)(d)(e), S1.36, S1.41, S1.43 (a)(b), S1.45, S1.46, S1.48, SASB: FB-AG-430a.3

The Company is exposed to risks associated with access to water and sanitation in communities within its local agricultural supply chain. This social risk is considered a potential financial risk over the short and medium term, since limitations in water availability, insufficient sanitation infrastructure, or conflicts regarding water use in these regions can affect supply continuity.

In certain regions, pressure on water resources may lead to regulatory restrictions, social tensions with local communities, or changes in operating conditions, which could influence local input availability, raw material price variability, or the need to modify sourcing locations.

9.2.1 Effects on the business Model and value chain

This risk is concentrated within the supply chain due to the Company's reliance on agricultural suppliers located in regions where access to water may be limited or subject to regulations.

Restrictions on water use, social conflicts related to its distribution, or changes in extraction permits could affect local agricultural production, result in variations in raw material costs, or limit supply from certain producing areas, which could influence the operation of plants that depend on those sourcing regions. In 2025, these effects did not result in changes to the Company's business model or the structure of its value chain.

9.2.2 Effects on strategy and decision-making

The Company considers water availability in supplier regions within its supply chain risk assessment processes, analyzing the stability of sourcing areas and compliance with regulatory and social requirements related to water use.

As part of this approach, the Company promotes actions aimed at diversifying the origin of raw materials, strengthening supplier monitoring, and assessing operating conditions in agricultural regions, in order to reduce exposure to supply disruptions or cost increases.

9.2.3 Effects on the current financial position

During the reporting period, the Company incurred expenses related to supplier monitoring, risk assessment in sourcing regions, compliance with regulatory requirements, supplier development programs, and initiatives intended to strengthen supply chain resilience, which are a part of the Company's ordinary operations and have been integrated into the income statement under the heading of operating expenses. Additionally, during 2025, no variations in raw material costs associated with water availability or changes in agricultural production were observed.

9.2.4 Anticipated effects on the financial position

Over the short and medium term, restrictions on access to water, regulatory changes, or social conflicts in agricultural regions could increase raw material costs, require changes in sourcing locations, or affect production stability in certain areas.

Under certain scenarios, these conditions could affect the operational continuity of facilities that depend on specific sourcing regions, and could also influence the cash flows of related business units.

Nevertheless, the Company considers that diversification measures, the strengthening of sustainable agricultural practices, and enhanced supplier engagement and monitoring can reduce exposure to this risk.

The Company anticipates a possible gradual increase in operating expenses associated with these activities, which would be recognized in the income statement and, given its recurring nature, would be reflected in cash flows from operating activities.

9.2.5 Risk management

S1.44(c)

Given that a significant portion of sourcing is concentrated in Mexico and the United States of America, the Company focuses its due diligence processes on these countries, verifying compliance with applicable regulations. As a result of the conducted assessments, no recent incidents directly arising from water access conflicts in supplier agricultural regions have been identified; however, continuous monitoring is maintained as part of the supply chain risk management system.

Additionally, the Company promotes responsible practices among its suppliers, including efficient water use, regulatory compliance, and the adoption of measures aimed at improving the sustainability of agricultural production, with the objective of reducing operational, regulatory, and reputational risks.

In communities surrounding its own operations, impacts are considered limited and are managed through social and community engagement programs as part of the Company's usual corporate responsibility practices.

Furthermore, the Company developed a Sustainable Sourcing Standard, which will be implemented during 2026, and sets out guidelines for responsible supply chain management and promotes

collaboration with suppliers to improve environmental, social, and operational practices, as well as resource efficiency and compliance with applicable regulations.

9.2.6 Metrics and targets

S1.49, S1.50, S1.51, S1.52, S1.53

The Company is currently analyzing the establishment of targets related to risks of access to water and sanitation, should these be identified as necessary.

9.3 Risks 11. and 14. Consumer health & safety, and Food quality & safety

S1.29(a)(b)(c)(d)(e), S1.30(a)(b), S1.32(a)(b), S1.33(a), S1.34(a)(b), S1.35(a)(b)(c)(i)(ii)(d)(e), S1.36, S1.41, S1.43(a)(b), S1.45, S1.46(a)(b)(i)(ii), S1.48
SASB: FB-PF-250a.1

The Company is exposed to risks related to consumer health and safety arising from the possibility of failures in production, storage, or distribution processes that may affect the quality or food safety of its products. This is considered a potential financial risk within the Company's own operations and the commercial chain, since the nature of the products requires ongoing compliance with stringent quality, food safety, and health regulatory standards.

The Company maintains quality and food safety management systems aligned with international standards and applicable regulations, including certifications and operational controls designed to prevent contamination, formulation errors, the presence of undeclared allergens, or regulatory non-compliance. Nevertheless, any deviation in production processes or within the supply chain could create risks to consumer health and result in adverse financial, legal, or reputational effects.

9.3.1 Effects on the business model and value chain

This risk is concentrated within the Company's own operations and in the commercial chain, since the quality and food safety of the final product depend on control over production, storage, transportation, and distribution processes.

Failures in these processes could result in regulatory non-compliance, product recalls, commercial restrictions, or effects on consumer confidence, which could influence sales, relationships with institutional customers, and the ability to remain in certain markets that require specific certifications. In 2025, these effects did not result in changes to the Company's business model or the structure of its value chain.

9.3.2 Effects on strategy and decision-making

The Company considers food safety a core element in its risk management and operational control processes, maintaining quality management systems, audit programs, international certifications, and internal controls designed to ensure compliance with applicable regulations in all countries where it operates.

As part of this approach, ongoing investments are made in quality and food safety management systems, certifications, training, maintenance, and upgrading infrastructure and specialized equipment, as well as in verification and traceability processes, in order to reduce the probability of non-compliance and ensure operational continuity.

9.3.3 Effects on the current financial position

During the reporting period, the Company incurred expenses related to the implementation and maintenance of quality and food safety management systems, certifications, audits, training, and improvements to equipment and infrastructure intended to ensure compliance with regulatory and market standards. These expenses are considered part of the Company's ordinary operations and have been integrated into the consolidated financial statements under the headings of operating expenses and property, plant and equipment, respectively.

9.3.4 Anticipated effects on the financial position

Over the short, medium, and long term, the Company anticipates that continued investments in control systems, certifications, infrastructure, and quality assurance processes will be necessary, which could increase CAPEX or OPEX in certain periods.

Should consumer health incidents or regulatory non-compliance events occur, additional costs could arise from product recalls, administrative sanctions, litigation, or remediation expenses associated with effects on consumer health, as well as adverse reputational effects that could influence product demand. In addition, increasing regulatory and consumer expectations regarding food composition, labeling, and safety could require modifications to formulations, processes, or controls, which could entail additional investments in the future.

The Company anticipates a possible gradual increase in operating expenses and capital investments associated with these activities. Such expenses would be recognized in the income statement and, given their recurring nature, would be reflected in cash flows from operating activities; the capital investments would increase the property, plant and equipment line item in the statement of financial position and would be reflected in cash flows from investing activities.

9.3.5 Risk management

S1.44(c)

The Company applies rigorous controls, certified processes, and continuous improvement systems to ensure that its products comply with international quality and food safety standards. From raw material sourcing through final distribution, each stage of the value chain is managed through formal procedures designed to protect consumer health, maintain product integrity, and ensure regulatory compliance in all markets where the Company operates.

The Company maintains a comprehensive quality and food safety management framework composed of corporate policies, operational procedures, and control systems covering the receipt of raw material, the manufacturing processes, storage, distribution, and customer service. All plants operate under internationally recognized methodologies, including SQF, BRC, and Hazard Analysis

and Critical Control Points (“HACCP”), as well as other food safety standards aligned with global certification schemes.

Raw materials, ingredients, and packaging materials are inspected upon receipt, and finished products are evaluated prior to release for distribution in order to prevent contamination risks, formulation errors, or regulatory non-compliance.

The management system also includes procedures for product innovation and development, non-conforming product management, traceability, regulatory compliance, supplier engagement, inventory control, by-product and waste management, and the operation of distribution centers, transportation, and storage. These controls help ensure that inputs meet established specifications, that procurement activities comply with applicable regulations, and that operational risks within the supply chain remain within acceptable levels. Likewise, distribution, sales, and complaint-handling processes are governed by formal guidelines designed to ensure that products reach end consumer under safe conditions and in compliance with legal and contractual requirements.

All internal policies and procedures relevant to these matters are authorized and overseen by Senior Management, enabling consistent implementation across all business units and reinforcing compliance with corporate standards. This governance framework allows the Company to manage risks related to quality and food safety and to reduce the probability of events that could affect consumer health, operational continuity, or the financial position.

9.3.6 Metrics and targets

[S1.49](#), [S1.50](#), [S1.51](#), [S1.52](#), [S1.53](#)

GRUMA seeks to market products globally that meet its specifications, satisfy customer and consumer needs, and comply with applicable regulations in the countries where it operates and sells its products.

To support the above, GRUMA monitors the quality of its products and services through performance indicators integrated into its Quality and Food Safety Management Systems. The metrics considered include the number of incidents resulting in product recalls, sanctions or regulatory non-compliance related to quality and food safety, as well as the associated costs. During 2025, no significant financial effects associated with the remediation of such incidents were generated.

10. GOVERNANCE RISKS AND OPPORTUNITIES

10.1 Risk 9. Privacy (related to cybersecurity)

S1.29(a)(b)(c)(d)(e), S1.30(a)(b), S1.32(a)(b), S1.33(a), S1.34(a)(b), S1.35(a)(b)(c)(i)(ii)(d)(e), S1.36, S1.41, S1.43(a)(b), S1.45, S1.46(a)(b)(i)(ii), S1.48

The Company is exposed to potential risks related to cybersecurity and data protection, arising from the increasing use of digital systems for business operations, supply chain management, and interaction with customers, suppliers, and other stakeholders. This is considered a potential financial risk within the Company's own operations, since cybersecurity incidents, unauthorized access, information loss, or disruptions to critical systems could affect operational continuity, regulatory compliance, and the trust of third parties.

The protection of confidential information, including data relating to employees, customers, suppliers, and business partners, is relevant to ensure compliance with applicable privacy and information security regulations. Any significant incident could result in legal liabilities, regulatory sanctions, recovery costs, or adverse reputational effects that could influence the Company's financial performance.

10.1.1 Effects on the business model and value chain

The business model is increasingly reliant on digital systems for the management of operations, logistics, procurement, finance, human resources, and commercial processes, making the availability and security of information a relevant factor for business continuity. A cybersecurity incident could result in operational disruptions and information loss, affect compliance with commercial and regulatory commitments, reduce operational and business efficiency, lead to the loss of competitive advantage, affect revenues, increase remediation costs, and negatively influence the confidence of customers and investors.

Likewise, the improper handling of personal data or confidential information could result in non-compliance with data protection laws in the jurisdictions where the Company operates, potentially leading to sanctions, operational restrictions, or additional compliance costs. In 2025, these effects did not result in modifications to the Company's business model or to the structure of its value chain.

10.1.2 Effects on strategy and decision-making

The Company has incorporated cybersecurity and data protection management into its overall risk management system, establishing policies, controls, and procedures aimed at preventing unauthorized access, protecting information, and ensuring system continuity. As part of this approach, investments are made in technology infrastructure, system monitoring, access controls, information backup, training, and audits in order to reduce the probability of incidents and keep operations within acceptable risk levels.

Information technology security risks have increased in recent years due to the growing sophistication and the activity of cyber threat actors. In this context, digital transformation and the increasing integration of systems throughout the value chain require the Company to continue

strengthening its security controls, as well as the oversight mechanisms applicable for third parties with access to critical information or systems.

10.1.3 Effects on the current financial position

During the reporting period, the Company incurred expenses related to the implementation and maintenance of cybersecurity systems, technology infrastructure upgrades, audits, monitoring activities, and compliance with data protection regulations. These expenses form part of the Company's ordinary operations and have been integrated into the income statement under the heading of operating expenses.

These expenses are intended to prevent incidents, maintain operational continuity, and comply with applicable information security and privacy requirements.

10.1.4 Anticipated effects on the financial position

Over the short, medium, and long term, the Company anticipates that continued investments in cybersecurity systems and mechanisms, data protection, technology infrastructure, and internal controls will be necessary, which could increase operating costs or require capital investments in certain periods. In adverse scenarios, a significant incident could generate costs associated with operational disruptions, information recovery, legal advisory services, regulatory sanctions, or third-party claims, as well as reputational effects that could influence relationships with customers, investors, or authorities.

The Company considers that, with the controls currently in place, this risk remains within acceptable levels.

10.1.5 Risk management

S1.44(c)

The Company has established a governance structure to oversee cybersecurity matters; strategy and risk management activities are overseen by the Audit Committee, and the Company has appointed the Chief Technology Officer ("CTO") as the executive responsible for leading the implementation of Information Technology strategies and the execution of cybersecurity measures across all operations. The CTO is responsible for protecting critical systems, overseeing data protection protocols, and ensuring the resilience of the digital infrastructure against emerging threats. To support this function, there is an international policy that establishes and sustains the corporate information security strategy, aligned with the Company's business objectives and applicable regulations. This policy defines specific action plans and sets general guidelines regarding information security.

10.1.6 Metrics and targets

Given the evolving landscape of communication technologies and artificial intelligence tools, the Company aims to continue investing strategically and progressively in assurance mechanisms to mitigate these risks and strengthen its cybersecurity systems. During 2025, the Company allocated U.S. \$2.11 million to cybersecurity-related initiatives. Additionally, expenses associated with

incident remediation measures amounted to U.S. \$0.004 million, while the premium for the cybersecurity insurance policy totaled U.S. \$0.602 million.

10.2 Risk 12. and Opportunity 4.

Risk 12. Prevention and detection of corruption and bribery

Opportunity 4. Internal corporate ethical culture

S1.29(a)(b)(c)(d)(e), S1.30(a)(b), S1.32(a)(b), S1.33(a), S1.34(a)(b), S1.35(a)(b)(c)(i)(ii)(d)(e), S1.36, S1.41, S1.43(a)(b), S1.45, S1.46(a)(b)(i)(ii), S1.48

The Company is exposed to potential risks related to acts of corruption, bribery, or regulatory non-compliance within both, its own operations and its supply chain, arising from interaction with suppliers, intermediaries, contractors, and authorities in various jurisdictions. The absence of adequate due diligence, oversight, or compliance controls could allow improper practices to occur, including unauthorized payments, conflicts of interest, or regulatory non-compliance, which could result in sanctions, legal liabilities, or adverse reputational effects.

Simultaneously, the Company identifies a financial opportunity associated with strengthening its corporate ethical culture with adherence to regulatory compliance, which contributes to improving the internal control environment, reducing operational risks, and strengthening financial stability. The consolidation of integrity and transparency practices helps reduce the probability of fraud, poor practices that could give rise to operational problems, or regulatory non-compliance, and favors more stable commercial relationships with customers, suppliers, and financial institutions.

10.2.1 Effects on the business model and value chain

This risk arises primarily within the Company's own operations and throughout its supply chain, where the procurement of services, the sourcing of raw materials, and interaction with third parties may involve exposure to improper practices in the absence of adequate controls. The occurrence of acts of corruption or non-compliance could result in investigations, sanctions, or restrictions on operating in certain markets, which would affect business continuity, relationships with business partners, or access to financing.

Conversely, strengthening a corporate ethical culture helps improve the reliability of information, operational discipline, and the quality of decision-making, which supports value chain stability and reduces risks associated with errors, fraud, or contractual disputes. In 2025, these effects did not result in changes to the Company's business model or the structure of its value chain.

10.2.2 Effects on strategy and decision-making

The Company maintains policies, codes of conduct, training programs, and due diligence processes aimed at preventing and detecting improper practices, which are a part of its overall risk management system and internal control framework. As part of this approach, periodic assessments, audits, compliance monitoring activities, and ethics training are conducted for employees and/or third parties. These actions are intended to reduce the probability of incidents,

enhance operational transparency, and ensure compliance with applicable regulations in all jurisdictions where the Company operates.

Likewise, strengthening the Company's ethical culture is considered an important element of corporate strategy, as it contributes to greater organizational alignment, talent retention, investor confidence, and the ability to adapt to regulatory or market changes.

10.2.3 Effects on the current financial position

During the reporting period, the Company incurred expenses related to compliance programs, training, audits, and internal controls aimed at preventing sanctions, litigation, or operational losses, and contributing to maintaining eligibility to operate in markets that require high standards of compliance and corporate governance. These expenses form part of the Company's ordinary operations and have been integrated into the income statement under the heading of operating expenses.

10.2.4 Anticipated effects on the financial position

Over the short, medium, and long term, the Company anticipates that it will be necessary to continue strengthening its compliance and ethical culture programs, which may result in increased operating expenses related to oversight, auditing, training, and legal advisory services.

However, the consolidation of a solid internal control environment can reduce the probability of losses from fraud, regulatory sanctions, or contractual disputes, as well as improve access to financing and the risk perception of investors and creditors. This could translate into greater cash flow stability, lower operational volatility, and better financing conditions over the long term.

The Company considers the strengthening of its corporate ethical culture to be strategic to the resilience of its business model and financial prospects and contributes to maintaining risk within acceptable levels.

10.2.5 Risk and opportunity management

S1.44(c)

The Company maintains an integrity and compliance framework designed to prevent, detect, and address acts of corruption, bribery, or misconduct across its operations and in the supply chain. This framework includes the Code of Ethics, the Integrity Policy, the Reporting System, and various corporate procedures that set out mandatory guidelines for employees, executives, and third parties acting on behalf of GRUMA.

All employees and relevant third parties have access to confidential channels for reporting possible irregularities in good faith, without fear of retaliation, in accordance with the Corporate Reporting System Procedure. Reports received are managed through formal protocols for investigation, documentation, follow-up, and resolution.

The Code of Ethics is mandatory for all personnel. This document establishes standards of conduct based on values such as integrity, honesty, trust, loyalty, impartiality, respect, tolerance, freedom,

responsibility, and legality, and expressly prohibits any form of corruption, conflicts of interest, or discrimination. The Integrity Policy complements this framework by establishing a zero-tolerance stance toward bribery, improper payments, influence peddling, or any practices contrary to applicable law and the Company's values.

Compliance is managed through internal audits, control monitoring, and reporting to Senior Management and the relevant committees, in order to keep it aligned with current regulations and with applicable international standards in the jurisdictions where the Company operates.

This control framework helps reduce the probability of non-compliance, strengthen operational transparency, and keeping the risk associated with improper practices within acceptable levels.

10.2.6 Metrics and targets

[S1.49](#), [S1.50](#), [S1.51](#), [S1.52](#), [S1.53](#)

The Company continues to strengthen its corporate culture based on the principles of ethics, integrity, and anti-corruption. In 2025, the Company's EthicsPoint Reporting System received 538 reports related to the Code of Ethics, covering various matters, including anti-corruption, of which 458 were addressed. During the reporting period, no sanctions or remediation costs associated with these incidents were recorded.

10.3 Risk 13. Supply chain management - Fair business practices

[S1.29\(a\)\(b\)\(c\)\(d\)\(e\)](#), [S1.30\(a\)\(b\)](#), [S1.32\(a\)\(b\)](#), [S1.33\(a\)](#), [S1.34\(a\)\(b\)](#), [S1.35\(a\)\(b\)\(c\)\(i\)\(ii\)\(d\)\(e\)](#), [S1.36](#), [S1.41](#), [S1.43\(a\)\(b\)](#), [S1.45](#), [S1.46\(a\)\(b\)\(i\)\(ii\)](#), [S1.48](#)

The Company is exposed to potential risks related to supply chain management and the implementation of fair business practices with suppliers and farmers, since contractual conditions, payment terms, or inadequate commercial practices could affect the stability of critical raw material supply. This risk is heightened by the concentration of a significant portion of suppliers in Mexico that cover the needs of operations in that country, where the agricultural sector faces structural constraints, including grain price volatility, increases in production costs, and limited access to financing for producers.

In this context, the relationship with this segment of the supply chain can directly influence operational continuity, cost predictability, and the Company's ability to maintain competitive sourcing conditions. Inadequate management of commercial terms or contractual compliance could result in supply disruptions, legal disputes, or the need to replace suppliers under less favorable conditions, with possible effects on cost of sales and operating margins.

10.3.1 Effects on the business model and value chain

The Company's business model depends on its supply chain for the procurement of agricultural raw materials and other key inputs, making continuity of commercial relationships with suppliers an important element for operational efficiency and the stability of cost of sales.

Inequitable commercial practices or non-compliance with contractual terms could affect the availability of inputs, increase prices, reduce access to strategic suppliers, or lead to legal disputes, which could influence operational continuity and the ability to meet demand in certain markets.

In addition, in markets with greater regulatory or customer requirements regarding responsible supply chain practices, inadequate controls could lead to reputational risks or limit participation in contracts that require specific compliance standards. In 2025, these effects did not result in changes to the Company's business model or the structure of its value chain.

10.3.2 Effects on strategy and decision-making

To mitigate this risk, the Company maintains policies and procedures for supplier selection, assessment, and monitoring, as well as contractual guidelines designed to ensure transparent commercial relationships consistent with applicable regulations.

As part of this approach, the Company promotes compliance with clear contractual terms, supplier approval processes, periodic reviews, and oversight mechanisms that make it possible to identify supply chain risks and take timely corrective actions.

Likewise, the Company considers supply chain stability to be a relevant element of its strategic planning, evaluating supplier diversification, contract formalization, and the strengthening of long-term relationships with key business partners.

10.3.3 Effects on the current financial position

During the reporting period, the Company did not identify significant effects resulting from inadequate commercial practices; however, expenses were incurred in connection with supplier assessment processes, audits, contract administration, and compliance monitoring. These activities are intended to reduce the probability of supply disruptions, contractual disputes, or unexpected increases in procurement costs.

These expenses form part of the Company's ordinary operations and have been integrated into the income statement under the heading of operating expenses.

10.3.4 Anticipated effects on the financial position

Over the short, medium, and long term, the Company anticipates that it will be necessary to continue strengthening supply chain management processes including contractual controls, compliance reviews, and monitoring mechanisms, which could result in increases in operating expenses related to oversight, auditing, or supplier administration. In adverse scenarios, a risk of this nature could lead to supply disruptions, supplier replacement under less favorable conditions, increases in cost of sales, contractual litigation, or reputational effects, which could influence operating margins and the stability of cash flows.

The Company considers that, with the controls currently in place, this risk remains within acceptable risk levels.

10.3.5 Risk Management

S1.44(c)

The Company maintains policies and procedures aimed at ensuring fair commercial practices with suppliers and business partners, including compliance with contractual terms, timely payments, and transparent communication. These guidelines are approved by Senior Management and are embedded within the internal control framework for supply chain management.

Payment terms are applied consistently across regions and supplier categories. In Mexico, most suppliers operate under standard terms of approximately 30 days, while certain strategic suppliers, such as farmers, logistics service providers, employees, and essential service providers, are settled on shorter cycles. In the United States of America, similar practices are applied, with accelerated payments for critical services.

At the end of the reporting period, the Company was not involved in any material legal proceedings related to late payments and continuously monitors the Days Payable Outstanding (“DPO”) indicator to assess compliance with its obligations. Observed levels remain within consistent ranges, reflecting financial discipline and contributing to supply chain stability, reducing the risk of operational disruptions or contractual disputes.

10.3.6 Metrics and targets

S1.49, S1.50, S1.51, S1.52, S1.53

At the end of the reporting period, no legal proceedings related to late payments to suppliers were filed.

10.4 Opportunity 2. Access to products and services (for end consumers)

S1.29(a)(b)(c)(d)(e), S1.30(a)(b), S1.32(a)(b), S1.33(a), S1.34(a)(b), S1.35(a)(b)(c)(i)(ii)(d)(e), S1.36, S1.40(a)(b), S1.41, S1.43(a)(b), S1.45, S1.48

The Company identifies a current financial opportunity associated with the provision of staple food products that have a high level of penetration across different market segments, which contributes to the resilience of the business model and to revenue stability. The essential nature of the products, as well as their cultural and nutritional relevance in various regions, supports consistent demand even in adverse economic environments.

The Company’s ability to supply both large retail chains and small retailers and local distributors enables broader access to staple products for different consumer groups, strengthening its market position and generating shared value in the communities where it operates.

10.4.1 Effects on the business model and value chain

The business model is supported by a production and distribution network that makes it possible to serve multiple commercial channels, including retailers, foodservice operators, independent

distributors, and small retailers. This diversification reduces dependence on a single channel or region and supports operational continuity in the face of changes in economic or market conditions.

The Company's participation in the staple consumer products sector helps maintain stable demand levels, supporting sales volume predictability and enabling more efficient planning of production, logistics, and raw material sourcing. In 2025, these effects did not result in changes to the Company's business model or to the structure of its value chain.

10.4.2 Effects on strategy and decision-making

The Company considers its participation in the staple products sector to be a relevant element of its growth and market consolidation strategy, promoting the expansion of distribution channels, the development of product formats tailored to different consumer segments, and the strengthening of its presence in local and international markets.

Likewise, the Company seeks to maintain an accessible and competitive product offer that serves consumers across different income levels, which helps sustain demand throughout different economic cycles and reduces revenue volatility.

10.4.3 Effects on the current financial position

During the reporting period, stable demand for staple products helped maintain consistent revenue and operating margin levels, even amid environments of economic volatility. The diversification of sales channels and product formats enabled the optimization of gross margins and improved the use of installed capacity.

These conditions have favored cash flow stability and helped maintain a solid financial profile, with no material adverse effects associated with this matter.

10.4.4 Anticipated effects on the financial position

In the short and medium term, the Company expects that demand for staple products will continue to provide revenue stability and resilience to the business model. The expansion of distribution channels, the strengthening of its presence in international markets, and the adaptation of products to different consumer segments could generate growth opportunities and improve operational efficiency, contributing to margin stability and sustained cash flow generation.

Nevertheless, the Company will continue monitoring market conditions and changes in consumer habits to ensure that the business model remains competitive over the short, medium, and long term.

10.4.5 Risk management

S1.44(c)

Through established processes and policies for new product development, the Company defines governance mechanisms for monitoring and oversight, ensuring consistency, control, and strategic

alignment throughout the innovation cycle. Within this framework, internal new product development committees oversee the creation and market launch of products, whether through the development of entirely new products or products that match or exceed successful proposals in target markets. Likewise, improvements and innovations within each Business Unit's existing portfolio are governed by these same policies, under a structured and competitive approach.