

VENTOLINI CODE OF ETHICS

ETHICS OF THE COMPANY TOWARDS EMPLOYEES, OF EMPLOYEES TOWARDS THE COMPANY, AND OF SUPPLIERS TOWARDS THE COMPANY

1. Ethical Principles

We guarantee the dignity of all individuals who are part of our organization, respect their freedom of expression, and establish appropriate communication channels. Likewise, our actions are framed within our corporate values.

Corporate Values

- **Commitment:** Maximizing our capabilities to adapt and respond around the customer.
I invest time and energy to fulfill my commitments.
- **Customer Orientation:** A permanent, focused attitude toward providing excellent service, actively listening to customers to identify their needs and prioritizing their satisfaction.
The customer is my priority.
- **Social Responsibility:** We work diligently to positively impact our environment and the communities around us.
A social-capital-driven company.
- **Quality:** We create products and experiences that exceed customer expectations and remain positively memorable.
I deliver what I promise.
- **Respect:** We recognize equality and promote transparency in all internal relationships and in those with suppliers and customers.
We are all equal.

2. Principle of Autonomy and Equality

We guarantee equal opportunities in all employment relationships, from recruitment through the termination of employment, ensuring non-discrimination based on gender, age, sex, or race.

All employees are entitled to fair and equitable treatment, opportunities for comprehensive personal and professional development, and economic and personal stability through policies and procedures that provide fair compensation, motivation, development, social security, well-being, and occupational health, aligned with the company's objectives, values, and goals, within a climate of mutual respect and commitment.

Employees are expected to act with loyalty and integrity, dedicate their working time responsibly, perform their duties with quality, maintain a collaborative attitude, strengthen teamwork, uphold company values, and fully commit to achieving corporate objectives.

These objectives include:

- **Prohibition of child labor:** Compliance with applicable laws regarding minimum working age.
- **Prohibition of forced labor:** Any form of forced labor or physical abuse is strictly prohibited.
- **Elimination of discrimination:** Employment decisions are based solely on skills, performance, and experience.
- **Working hours and compensation:** Full compliance with applicable wage, working hours, and benefits legislation, while offering opportunities for professional development.
- **Occupational health and safety:** Providing a safe and healthy workplace, reducing the risk of accidents, injuries, and health hazards.
- **Environmental care:** Compliance with environmental regulations and promotion of continuous improvement toward global sustainability.

3. Ethical Standards

All employees must adhere to ethical conduct that ensures respectful, equal, and honest relationships:

- Proper use of company tools strictly for work-related purposes.
- Confidential handling of company and product information, formalized through contractual clauses.
- Accuracy and truthfulness in information regarding products and services.
- Prohibition of personal or family benefits derived from relationships with suppliers or contractors, including gifts or invitations that compromise independence.
- Immediate termination of employment in cases of fraud or sabotage.
- Employees are not allowed to participate in customer-only promotional campaigns.
- Travel expenses and advances must comply with company policies and legal requirements.

Any employee who suspects illegal or unethical activities must report them to:
lineaetica@ventolini.com

All employees must be fully familiar with this Code of Ethics and the communication channels established therein.

4. Ethics of Employees Towards Customers and Consumers

Relationship with Customers

Customers are key allies in business success. Employees must provide outstanding service in quality, timeliness, respect, and transactional security, complying with all sales, credit, billing, and customer service policies.

Commercial Management

- Orders must reflect exactly the products and quantities requested by customers.
- Orders must be taken directly by the assigned sales representative.
- Discounts and bonuses may only be offered with prior approval from General Management.
- Franchise customers must sign responsibility agreements for company-owned equipment.
- Deliveries must be made only to registered addresses.
- Complete customer registration documentation is mandatory.
- Intermediation between customers, personal loans, or product exchanges are prohibited.
- Delivery personnel must handle and deliver products in optimal condition.

Relationship with Consumers

We maintain respectful relationships with consumers, offering products that meet expectations and comply with regulations. Employees must not make statements admitting product non-compliance without proper investigation through authorized channels. Consumer complaints must be referred to the Marketing Manager and/or Sales Channel Manager.

5. Communications and Responsible Marketing

Ventolini / Don Jacobo is committed to responsible marketing. All communications must be truthful, ethical, and aligned with our values, covering labeling, advertising, promotions, digital media, privacy protection, and e-commerce.

Marketing principles include:

- High-quality food offerings
- Responsible, transparent communication

- Compliance with Colombian labeling regulations
- Promotion of healthy, balanced lifestyles
- No marketing targeted at children under 12 years of age
- Ethical promotions and advertising free from violence, discrimination, unethical values, or excessive consumption

6. Ethics for Senior Management

Senior executives must demonstrate the highest standards of honesty and ethical conduct, manage conflicts of interest transparently, ensure accurate and timely disclosure of information, and comply strictly with all applicable laws and regulations.

Conflicts of interest, improper personal benefits, confidentiality breaches, misuse of company assets, unfair negotiations, insider information misuse, and unethical relationships with competitors, suppliers, or public officials are strictly prohibited.

Senior management must report any suspected violations to the Ethics Committee and cooperate fully with investigations. No retaliation will occur for reports made in good faith.

7. Ethics of Suppliers, Contractors, Third Parties, and Government Entities

Ventolini works with partners who share our values, uphold human rights, labor standards, environmental responsibility, and anti-corruption principles.

- No bribery, improper payments, or facilitation payments are allowed.
- Transactions with entities involved in illegal activities are prohibited.
- All interactions with government entities must meet the highest ethical and transparency standards.

Final Provision

This Code of Ethics is binding for all employees, executives, suppliers, and third parties acting on behalf of Ventolini.