

# VIÑA VALDIVIESO

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## CODE OF ETHICS AND CONDUCT

The history of Valdivieso dates back to 1879, the year in which Mr. Alberto Valdivieso founded Champagne Valdivieso, the first sparkling wine producer in Chile and South America. After a century since its foundation, the commercial production of wines begins in the Lontué winery, in the Curicó Valley. Today Viña Valdivieso has a portfolio of high quality wines and continues in the search for the best terroirs within Chile.

Viña Valdivieso, in its constant concern to maintain its values, its tradition, and care for its people, has embodied in this code of ethics and conduct principles and minimum ethical and conduct values in which the actions of the directors, executives and workers of Viña Valdivieso must be framed, who will guide us and allow us to continue with our legacy.

### IMPLEMENTATION FRAMEWORKS

The Code of Ethics and Conduct will be applicable to every person linked to Viña Valdivieso's operations, including its Board of Directors, Executives and Employees, who must be informed about it. The Code will be an integral part of the legislation and regulatory framework that govern us in all areas of our organizational work.

This Code of Ethics and Conduct was not conceived to cover all possible situations, nor as a compendium of all the laws, regulations and policies that could affect the Company. Therefore, under no circumstances should this Code be understood to replace or repeal other internal policies and / or procedures, but on the contrary, it complements and / or integrates with them.

### EMPLOYEES OF VIÑA VALDIVIESO

#### Board of Directors

To guarantee compliance with the Code of Ethics and Conduct, the Board of Directors is responsible for:

1. Leading and managing responsibly, ensuring the success of the business, taking care of the values and ensuring the good performance and care of each worker.
2. Ensuring compliance with legislation, company policies and procedures in the performance of their duties and leadership.
3. Ensuring the safety of its workers, their health and well-being in the performance of their duties.
4. Taking care of relationships with customers and suppliers, ensuring compliance with the agreements and documents resulting from business relationships.

#### Executives and Workers

To ensure proper behavior, Executives and Workers have the following obligations:

1. Observe an honorable and irreproachable conduct.

2. Comply with and enforce the laws, rules, and regulations applicable to their activity and role in the company.
3. Respect and act in accordance with the dignity of the people with whom it relates, as directors, executives, workers, contractors, subcontractors, suppliers, authorities or clients.
4. Carry out the work efficiently and diligently, fulfilling their obligations in a spirit of collaboration and improvement, and avoiding compromising their health, integrity, and safety and that of others.
5. Maintain due loyalty to the Employer, in its various aspects, which includes, among others: maintaining strict confidentiality of all matters that come to its knowledge due to the provision of services to the Employer and the operations carried out by the Winery, for it could cause damage to it, as well as avoid and prevent any action aimed at causing damage to the information kept by the Employer in any medium.
6. Maintain strict and timely compliance with the instructions, policies, regulations and orders of the Employer or its representatives, carrying out the activities (direct and indirect) that are related to the function that they will perform and that are necessary to fulfill adequately, efficiently, and timely the work for which he was hired.
7. Immediately inform your superior, or the pertinent official, of any non-compliance or possible non-compliance with the law or the policies, including this Code. Provide the cooperation required by the audit procedures that determine compliance with the standards suited to Viña Valdivieso.

## General Prohibitions

1. Reveal, disclose or use information, data or precedents of the Winery or that are related to it, for personal benefit or that of third parties, whatever the way they are accessed, even when they have not been assigned to be kept from themselves.
2. Cause unauthorized alteration or modification in computer systems, load unauthorized software, reveal, or provide third parties or unauthorized Company personnel, passwords or information contained in the systems and incur in adulteration of systems and information.
3. Misuse and / or withhold documentation, money, checks or business papers from the Vineyard.
4. Appear to fulfill their duties while intoxicated, or under the influence of narcotics or drugs.
5. Not to use directly or indirectly, for their own benefit or that of third parties, resources that are within their reach in the development of their activities or because of their positions.
6. It is prohibited to offer or give gifts to public and / or private officials, when these could be perceived as an incentive and represent a breach of laws, regulations and policies, or when they inconveniently or negatively affect the image and reputation of the Winery.

## Conflict of Interests

In order to ensure a transparent, secure and stable business relationship over time, Executives and Workers must:

1. Refrain from providing services, permanent or sporadic, to other companies or natural persons, within the time that must provide services to the Company and, in no case, to entities that have the same or similar business, or are the responsibility of the Vineyard .

2. Not to carry out, on their own account or for third parties, any negotiation related to the Employer's own business. Any operation, business or work of the worker that implies acting in the same sphere of commercial activities of the Employer shall be considered as such.
3. Not be affected the independence, impartiality or personal gain, on the occasion of business relationships of the Company.
4. Refrain from receiving gifts, invitations to travel and other statements offered by clients and / or suppliers that jeopardize independence, objectivity and transparency in business relationships.
5. Ensure that the selection and contracting of suppliers is based on formal, professional and technical criteria with a focus on the benefit for the Winery, in a fair and transparent choice, respecting the internal procedures for these operations.

## LABOR RIGHTS

In order to ensure due adherence to the rights of workers, Viña Valdivieso is responsible for:

1. Respecting and ensuring compliance with labor legislation and regulations that are the regulatory framework for our management..
2. Protecting the right of its workers, taking care of working conditions, remunerated compensation for the work / function that it develops and promoting job stability.
3. Respecting the labor legislation (Art. 13 Labor Code), regarding child labor and not promote the work of minors.
4. Prohibiting discrimination in the workplace. Each worker will enjoy equal opportunities and treatment, regardless of their ethnic origin, religion, nationality, color, marital status, age, political opinion, sex, physical handicap or other.
5. Prohibiting and rejecting behaviors of sexual or labor harassment, or those that involve situations of forced or compulsory labor, or those that derive from the violation of workers' rights.

## RELATIONSHIP WITH CUSTOMERS, SUPPLIERS AND COMPETITORS

### Clients And Suppliers:

The Company will ensure that it interacts with suppliers of goods and services in an ethical and lawful manner.

The Company will promote work with suppliers whose business practices respect people, workers and comply with the laws in force that regulate them.

The Company will select suppliers based on the suitability of their products or services, as well as their price, delivery conditions and quality, not accepting or offering gifts or commissions, which may alter the rules of free competition in production and distribution of goods and services.

The Company guarantees its products (Sparkling Wine and Wine), seeking excellence in quality and makes available to its customers and consumers the opportunity to attend to their possible claims in a fast and efficient way, to seek the satisfaction of our customers and consumers. in the long run.

The Company promises to ensure the confidentiality of the information of its customers and suppliers to avoid its misuse.

## Competitors:

The Company will compete loyally with other companies in the field, always within the framework of mutual respect, refraining from unfair practices such as collusive agreements, abuse of a dominant position and predatory practices.

## RELATIONSHIP WITH PUBLIC ORGANIZATIONS

Viña Valdivieso will ensure that it interacts with public bodies in an ethical and lawful manner.

The Company is committed to maintaining relationships of respect, collaboration, and trust with public or state organizations, such as the Agricultural and Livestock Service, the Internal Revenue Service, the Labor Directorate, Municipalities, among others.

## CORPORATE CRIMINAL LIABILITY

In accordance with Law No. 20,393, which establishes the criminal liability of legal individuals, the scope of liability applies to the following crimes:

- a.* Money laundering offense (Article 27 of Law No. 19,913)
- b.* Offense of financing of terrorism, (Article 8 of Law No. 18,314) and
- c.* Crimes of bribery of a national public official and of bribery of a foreign public official (articles 250 and 250 bis A of the Penal Code)

In consideration of the foregoing, the Company expressly prohibits any conduct that may give rise to the criminal prosecution of the Company under Law No. 20,393 for acts committed by Owners, Controllers, Directors, Managers, Executives, Representatives, who carry out activities of administration or supervision and any collaborator of the Company or external that represents the Company. Likewise, natural individuals who are under the direct direction and supervision of any of the aforementioned subjects and, in general, all employees of the Company are included.

## PREVENTIVE LABOUR STANDARDS

Viña Valdivieso is committed to ensuring compliance and control of crimes through its "Control Policy Law No. 20,393", which defines crime prevention measures, administration procedures and auditing of financial resources, the associated controls to verify the validity of the prevention measures and the respective reporting channels.

## SUSTAINABILITY

Viña Valdivieso is committed to caring for the environment. Consequently, Executives and Workers undertake to carry out their operations and provide their services, taking care to minimize, as far as is reasonable and possible, their impact on the environment and to comply with the requirements of current legislation in this regard.

The entire Company must incorporate this concept in the execution of its tasks, contributing to the care of resources, avoiding overconsumption of water, fuel, electricity and other energy sources.

Similarly, those who become aware of events or activities related to the Company, which have a polluting or damaging effect on the environment or imply a breach of the applicable regulation, will immediately report this situation to the competent administrative authorities.

When legally appropriate or deemed necessary or correct, the Company will report this situation to shareholders, regulatory entities and the general public, in a complete and truthful manner, thus complying with the provisions of the law regarding this matter.

## SOCIAL RESPONSIBILITY

Viña Valdivieso is committed to the contribution and sustainable human development of its workers, their families and the community through the commitment, respect and support of the Company in the personal and social issues that affect them.

The company will always be willing to contribute to the development of the surrounding communities and, therefore, privilege the hiring of labor from the sector and, as far as possible, the selection of suppliers of goods and services.

## DECLARATION

I certify that I have read the Code of Ethics and that I understand that it is part of the conditions and practices that Viña Valdivieso has for the development of activities and that I commit to respect.

I understand the importance of this document and I agree to consult all those situations, conditions, doubts that may arise from situations not contained in this document and that may be considered as part of "ethical issues" of the Company.

Name:

RUT:

Company position:

Date:

Signature: