

CODE

OF ETHICS

VFC WINES SPA

2020
VERSION 1.0

VFC
WINES

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Introduction

VFC Wines SPA, or VFC, has developed this Code of Ethics which, together with our Sustainability Policy, looks to establish our values and principles as they apply to our work with all of our collaborators, including full-time employees, executives, seasonal employees, consultants, contract workers, and sub-contracted workers, as well as to guide our relationship with relevant parties such as clients, suppliers, authorities, and the community, framed within a permanent respect for the environment.

The Code of Ethics defines ethical behaviors, meaning it defines what we aspire to be collectively as an organization, as well as individuals.

Therefore, all employees and collaborators must act within the framework of our Code of Ethics, actively applying and defending its values, principles, and established rules. All interested parties associated with VFC must also ascribe to this Code.

We must always be on the lookout for failures to comply with the values, principles, or rules, as it is a serious fault that may mean not only legal action, either for individuals or for the winery as a whole, but may also affect the reputation of the company. All of the executives and superiors at VFC must strictly comply and supervise the application of this Code of Ethics.

In order to fully understand this Code of Ethics, all VFC collaborators must:

Fully read,

understand, and apply the values, principles, and norms of this Code of Ethics in their daily activity.

Request immediate assistance

from a superior, or contact the Ethics Committee, if there is the smallest doubt relative to the application of this Code of Ethics.

VFC WINES SPA

2. OUR VALUES

The ethical guidelines found in this Code of Ethics come from our fundamental values, including the following:

RESPECT FOR ALL PEOPLE

INTEGRITY IN OUR COMMERCIAL PRACTICES

ENVIRONMENTAL RESPONSIBILITY

3. OUR PRINCIPALS

3.1 BUSINESS ETHICS

- Legislative Compliance

We comply with all legalities that expressly prohibit the use of corrupt practices (bribery, illegitimate pressure, among others) to obtain unfair commercial advantage, as set in Law 20,393 that establishes criminal liability for the crimes of bribery, money laundering, and financing of terrorism.



Therefore, no VFC collaborator shall:

Offer a public employee any economic benefit for personal gain, or to a third party (bribery).

Conceal or cover the illicit origin of certain goods, knowing where they came from, directly or indirectly related to the illegal movement of narcotics or psychotropic substances, terrorism activities, or arms controls, among others (asset laundering).

Not, by any means, directly or indirectly, solicit, gather, or provide funds with the aim of using them to commission any terrorist act.

- Fair Competition

We believe in free and fair competition, which is why we explicitly promote fair competition as a company value, incorporating policies and rules related to free competition, and committing ourselves to refrain from participating in any acts such as collusion, abusing a dominant position, or “predatory” practices.



Las leyes antimonopolio, también conocidas como leyes de competencia, tienen por objeto garantizar que los mercados competitivos operen. El incumplimiento infractores individuales.

Todos los colaboradores de VFC deben cumplir estrictamente todas estas leyes antimonopolio o de competencia.

We promote **total transparency** in the creation of our commercial documents, and we highlight the advantages of VFC, instead of underscoring the weaknesses of our competitors.

We shall not **denigrate, discredit, or intentionally defame** our competitors, and we shall not commit to offering our wines if we are unable to produce them.

3.2 ETHICAL PRACTICES WITH THE STATE

All VFC employees that interact with government employees must prevent and avoid any action that may infringe any law related to Probity, Bribery, and Transparency, in order to respect the laws and abstain from any activity that might infringe upon these regulations.

All VFC employees must maintain a respectful and honest relationship with government employees, responding in a timely, complete, and transparent manner, to any requests for information that are made.

Additionally, any worker that has knowledge of dishonest actions on the part of the government employee must immediately alert the Ethics Committee. The corresponding inquiries will be made, and the situation will be resolved and channeled to the correct authority.

As a preventative measure, we will be constantly training our workers who interact with public officials in ways to avoid these kinds of crimes and situations.

3.3 SUPPLIER RELATIONS

We look to always maintain a responsible commercial relationship with our providers, so we strictly prohibit any use of unethical sales, undue pressure, tricks, use of influence, or incentives, among other actions, in order to receive a sales advantage.

We monitor the behavior of our personnel responsible for purchases with constant reminders of ethical behavior during the acquisition of goods or services .

We aspire to have our suppliers act in compliance with our Code of Ethics, and we select them through objective criteria, as well as their level of compliance with this Code.

Additionally, we take steps to make sure that our providers understand the standards we expect for our company, with meetings and visits to their business, among other steps, and with this, we've developed a letter that summarizes our expectations when it comes to the ethical practices of our suppliers.

We are committed to having defined criteria for each supplier in terms of payment plans, rights, and other relevant aspects, that ensure a rigorous, transparent, and well-documented relationship. We will place special emphasis on paying all of our suppliers within a 30 day period after the reception of the Bill of Sale.

We will also prioritize working with local suppliers, ensuring cooperation with the communities closest to the company, thereby reducing our carbon footprint, while also within the framework and respecting the actions laid out in this Code.

3.4 HUMAN RIGHTS

Child Labor

We do not accept the hiring of any minor under 15 years old, while respecting any current national legislation, and we actively reject child labor, respecting all International Labor Organization conventions and those of the United Nations.



We control our hiring by checking identification and the age of every worker, in compliance with the current labor legislation.

- Forced Labor

We do not accept any form of forced labor or exploitation, as we believe above all else in the respect and dignity of all individuals, and we consider it unacceptable to maintain any person performing a task against their will and under threat.

- Discrimination

We do not discriminate nor support discrimination at any point in our management chain, with regards to: gender; sexual orientation; age; race; religious creed; political beliefs; nationality; or people with different capabilities, or for any motive unrelated to the task that must be performed or the job or profile in question. In this way, we ensure that we support and respect that specified by the State and the public organisms related to workplace inclusion.

- Harrassment

We support the idea that all of our collaborators feel respected and valued, which is why none should be the object of workplace harassment, be victim of unfair treatment, or be isolated in their environment, etc.

We also categorically reject sexual harassment in the workplace, and as such, any type of inappropriate sexual behavior is strictly prohibited. Sexual harassment is understood when one person, by any means, acts improperly, in a sexual nature, and without consent by those that receive it, or if someone is threatened or impaired in any workplace situation or opportunity.

If any VFC employee is proven to have engaged in sexual harassment of any kind, that person will be terminated immediately without the right to compensation.

VFC encourages all of its workers to report any situation related to this, and to report it to their direct superior or the Ethics Committee.

We also prohibit the use of corporal punishment, coercion, verbal or physical, as a means of punishment, verbal abuse, or inhumane treatment of our workers and any other related person.

- Foreign Workers

When hiring foreign workers, we will ensure that we are complying with all current legislation. Among other aspects, a foreign worker's contract must be signed in Chile, witnessed by a Notary Public, and contain the minimal stipulations as stated in Article 10 of the Work Code. Additionally, we must respect the maximum percentage of foreign workers that may be hired by an employer.

- Collaborators with Disabilities

VFC must facilitate the workplace inclusion of personnel with disabilities, without having this affect our production processes. The type of work assigned must not present a potential danger for the personnel hired or for their coworkers. When discussing disabilities, we are referring to the concept as defined by the International Convention on the Rights of Persons with Disabilities, which states that it is a long term physical, intellectual, or sensorial disability that, when confronted with certain barriers, may impede that person's full and effective participation in society, when all other conditions are equal.

3.5 QUALITY OF WORKING LIFE



- Equal Opportunities

We provide equal opportunity to positions, in order to move toward the elimination of the gender wage gap, not considering arbitrary objective differences in salaries when justified, among other reasons, for skills, qualifications, suitability, responsibility, and productivity.

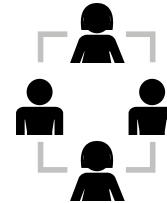
We concern ourselves with maintaining job descriptions and salaries on the market scale, and always look to provide equal pay for a job of equal value.

- Gender Equality

We are committed to gender equality, where no arbitrary differences exist in the treatment, conditions, and salaries of our employees because of gender.

3.6 WORKER PARTICIPATION

We consider our collaborators to be our principal asset, so it is fundamental to include their participation and incorporate their suggestions, ideas, opinions, complaints, etc., in order to improve the management of the company and in benefit to all of us who form part of the company.



In order to facilitate worker participation, we have communication channels open in the Cellar, Vineyards, and central office, like suggestion boxes, intranet, a web system, and forms, among others. All ideas and suggestions are reviewed and evaluated for implementation.

We also encourage communication between executives and employees, in order to discuss mutually beneficial ideas related to management, also incentives, results, goals, and the workplace environment.

3.7 FREEDOM OF ASSOCIATION

VFC does not place obstacles for workers to unionize, or for their right to collective negotiation within the Company with organized groups of workers.

Workers may freely choose their representatives and leaders. No type of discrimination, harassment, intimidation, or reprisals are permitted, for those who form part of the syndicates, associations, or other type of worker organization.

3.8 LABOR LEGISLATION

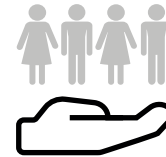
As a basic principle we comply with the current labor laws, meaning that our personnel all have a valid work contract, receive salaries that meet at least the minimum required in the labor laws, the legally corresponding discounts are paid, and we meet the legal requirements for the workday schedule.

As it may apply, we demand that any subcontracted company also guarantees that they meet all labor laws.

We do not discriminate against any subcontracted personnel, and guarantee similar working conditions and training to direct hires of the company, when they perform the same job.

3.9 HEALTH AND SAFETY

The health and safety of our workers at VFC is a constant preoccupation on our part, and we guarantee it through the application of protocols that include safety norms, prevention, health checks, emergencies, etc.



We have a Safety and Occupational Health Policy, which is an active and permanent commitment in the entire organization, allowing for a workplace free of occupational accidents and diseases, in line with the principles of Corporate Social Responsibility.

3.10 HEALTHY LIFESTYLE

We encourage a healthy lifestyle among our workers, and we urge them to replicate it with their families and loved ones.

3.11 DRUG AND ALCOHOL ABUSE

Aware of the fact that we are a company that produces alcoholic beverages, we are committed to making our workers and their families aware of the risks of alcohol abuse and the misuse of wine.

As a company we categorically reject the consumption of drugs or other illegal substances at the workplace.

3.12 COMMUNITIES

Beyond complying with the laws and applicable laws, VFC has identified the communities where we have an influence, and we evaluate our impact on these communities due to our production activities, creating an **action plan to minimize or enhance the negative or positive effects**, respectively.

We have established permanent **communication channels** with the community and with local authorities that allow us to be involved. Through these channels we are informed of the expectations and interests of the community for the company, with the goal of working together to develop concrete projects and to improve the quality of life of the local community.

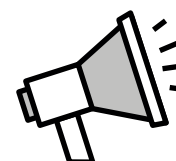
Our company is **open to the community** and, within our capacity, we keep our doors open to them, while making efforts to allow for the use of the installations by third parties, allowing them to be used for activities that help the community.

We encourage the participation of our workers and collaborators in social projects carried out in the local community. To do that, we make it easier for the workers to carry out their jobs and get involved in some of these initiatives through the coordination of the activities related to the institution.

As a part of our efforts to assist in the local community's development, we prioritize hiring suppliers and services from the local community, always and when they are available and meet with the requirements the company is looking for.

3.13 MARKETING

Our communications policies and marketing campaigns maintain our values and ethical principles, including both internal and external communications, with **transparency and truthfulness** in our actions in any arena. We use true content in our marketing campaigns, free of tricks or incitement to inappropriate behavior.



We respect fair competition, and will not plagiarize any concept used by our competitors in the market or incorporate aggressive messages directed at them.

We reject any propaganda or publicity campaign that uses people, particularly children, adolescents, or at-risk individuals in immoral, risky, or dangerous situations, or campaigns that denigrate or disparage people or groups, especially for racial, political, ethnic, religious motives, or for gender or sexual orientation.

3.14 ETHICAL SALES

We formally and explicitly prohibit non-ethical sales that include means of pressure, cheating, undue influence, extra payments, etc. This principle is the base for developing our commercial activities and sales, and is known by the commercial area.

We respectfully maintain the information of our clients, without compromising their privacy, and therefore any information of theirs to which we have access, will always be confidential.

We have implemented measures to comply with these principles, such as training our personnel and requiring passcodes for information, among others.

3.15 CONFLICTS OF INTEREST

Commercial decisions should always be made based on objective reasons and criteria, which means that all VFC employees must be aware of any conflict of interest that could be produced when a personal, family, or relations' interest differs from those of the company.

Some common conflicts that we must be aware of and recognize are:

Having a personal and professional relationship with a supplying company, client, competitor, or subcontractor.

Having an investment or participation of any kind in a supplying company, client, competitor, subcontractor, or other company.

Having a personal or family relationship that comes into conflict with professional life, such as having a family member who works for one of the Winery's competitors, or becoming an administrator in the winery with the direct supervision of a close friend.

Therefore, if any member of VFC finds themselves in a situation or activity that could become a conflict of interest, it must be revealed to a direct boss or to the Ethics Committee, to be approved in writing prior to continuing.

We regulate these situations that may generate conflicts, and this includes prohibiting in certain cases and previously proven situations, and notifications and authorizations in others.

3.16 ENVIRONMENT

VFC is **committed to respecting and caring for the environment**, both in complying with environmental laws and regulations, and including those in Chile and in the countries where we have a presence.



We identify the principal impacts, both positive and negative, of our activities on the environment, and take steps to mitigate the negative impacts, including:

Prioritizing low-impact pesticides in the vineyards, while respecting the requisites stipulated in the green area of the Code of Sustainability, in terms of dosing, monitoring, and alternating, among others.

Maintaining a waste-water plant that meets all current regulations, maintaining a constant control of the residual liquids and avoiding any water contamination or smells.

We control our water, electricity, and fuel use, maintaining monthly consumption records in order to meet established goals and make our use of these resources as efficient and responsible as possible.

We have developed a management plan for all waste, so that it is classified, stored, and disposed of in authorized locations.

4. ETHICS COMMITTEE AND COMPLAINTS

The Ethics Committee is the entity that decides whether an action is an infringement or violation of any of the principles of this Code of Ethics, and among their functions are:

To promote the concepts and ethical standards of the company

Respond to queries from personnel and analyze any complaints

Investigate and document cases

Apply sanctions/penalties

Maintain statistics and reports

The Ethics Committee shall be comprised of representatives from distinct areas of the company, and who have been recognized for their exemplary behavior, and shall be appointed by Management or Executives.

Any non-compliance of the Code of Ethics detected by an employee of VFC should be communicated to a direct superior, who must then inform the Ethics Committee, who must analyze the case and determine the respective penalty, if applicable.

The identity of any worker that makes a claim shall remain anonymous, if this person requires of requests it specifically.

Finally, we would like to encourage all of the employees to bring up problems and request assistance about any ethical quandary, such as security, quality, or the environment.

5. VALIDITY

The current and valid version of the Code of Ethics will be that found on the VFC website. This document is public in nature, and is available for download or printing, for those that require it.

