

UNDURRAGA

WINE GROUP

CODE

OF ETHICS

BISQUERTT
Family Vineyards

TALAGANTE
INTERNATIONAL
BRANDS
TIB

UNDURRAGA
ESTABLISHED IN 1885

BODEGA
VOLCANES
DE CHILE

VFC
WINES


BOUCHON
FAMILY WINES

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I.- INTRODUCTION

Undurraga Wine Group has developed this Code of Ethics with the aim of establishing our values and ethical principles, applicable to all collaborators, including permanent employees, executives, temporary staff, advisors, contractors, and subcontractors. This code also seeks to guide our relationships with clients, suppliers, public institutions, and the community, always framed within a constant respect for the environment, social responsibility, and human dignity.

The purpose of this code is to promote a work environment based on mutual respect, transparency, and fairness, both within the organization and in our interactions with clients, partners, suppliers, and the community in general. Through its principles and policies, we aim to foster trust, prevent inappropriate behavior, and ensure that our decisions reflect the core values of Undurraga Wine Group.

This Code of Ethics is a key tool for responsible decision-making, guiding our actions and strengthening our commitment to legality, respect for people, and environmental care. All members of Undurraga Wine Group have the responsibility to understand and adhere to these principles, thus contributing to an ethical and sustainable work environment.

II.- FRAMEWORK

Our Code of Ethics is based on seven fundamental principles that must be present in our actions. These principles determine our guidelines and directives, establishing the foundation for protecting our stakeholders. These principles are:

Compliance with Current Regulations

Every collaborator of Undurraga Wine Group must, without exception, ensure compliance with and enforcement of the laws in force in the place where they operate, especially those related to the industry in which we conduct business.

Corporate Vision

Innovation and tradition are the foundations of our strategy. We have the support of 138 years of experience, but we always look toward the future, staying attentive to the latest market trends to meet the evolving needs of consumers. We are not afraid to break conventions and venture into the unknown.

- 1) Sustainability is also one of our strategic pillars. Now more than ever, and with future generations in mind, we reaffirm our commitment to continuing to protect our environment and combat climate change.
- 2) Corporate Mission
- 3) We are a winery dedicated to the production of high-quality wines—distinctive, authentic, and consistent. We aim to express the identity and quality of our vineyards in each of our product lines.
- 4) Our strategic pillars are tradition, innovation, and sustainability, with an increasing awareness of the importance of being more proactive in caring for the environment and engaging with our community.

Our Values

- Responsibility
- Quality
- Passion
- Honesty
- Commitment

Our Corporate Competencies

- a) **Transparent Communication and Relationships:** Maintain excellent interpersonal relationships and foster trust. Be honest and transparent with internal and external stakeholders. Develop and enrich networks with those you interact with, both internally and externally, demonstrating an open and sincere communication style that facilitates agreements and commitments while acting with respect and warmth.
- b) **Trust:** The ability to act appropriately in a given situation, strengthened by consistent actions.
- c) **Passion:** Have an in-depth understanding of the expectations of one's role and fulfill the expected outcomes. Promote and demonstrate behaviors focused on the success of the entire work process. Take pleasure in one's work, continuously fostering reflective and constructive conversations. Avoid settling for surface-level interpretations of events. Encourage and stimulate workplace relationships, maintain self-motivation, and inspire commitment and identification.
- d) **Commitment to Our Clients:** Improve response time and quality, delivering solutions that foster trust and long-term relationships. Get involved in processes and, when faced with recurring needs or requests, proactively anticipate responses or tasks. Listen carefully to task requests, assignments, or product needs.

Human Dignity

Our Code of Ethics is inspired by non-negotiable principles for every collaborator. Above all, we emphasize respect for human dignity. Everyone at Undurruga Wine Group must be treated equally, regardless of ethnic origin, religion, nationality, marital status, age, political views, gender, physical disability, or any other characteristic.

Essential Principles

The collaborators at Undurruga Wine Group are essential; without them, our vision would never come to fruition. It is therefore vital that each one commits to the following:

- Supporting the development of all Undurruga Wine Group collaborators by promoting individual talents and reinforcing their self-esteem.
- Promoting respect among all Undurruga Wine Group collaborators, ensuring that everyone is treated as equals.
- Ensuring dignified and fair treatment for every collaborator, which is essential to Undurruga Wine Group.
- Recognizing and rewarding the efforts made by our collaborators.

III.- CORPORATE CRIMINAL LIABILITY

Undurraga Wine Group fully acknowledges and assumes responsibility for complying with the provisions of Law No. 20.393, which establishes the criminal liability of legal entities in Chile concerning the following offenses: money laundering, financing of terrorism, bribery of national or foreign public officials, receiving stolen goods, improper negotiations, private-sector corruption, embezzlement, unfair administration, contamination of hydrobiological resources, improper coercion of subordinates to violate quarantine or health isolation measures ordered by authorities, fraudulent collection of unemployment insurance benefits, arms trafficking, human trafficking, illegal logging, and economic crimes, among others.



In this context, the company reaffirms its commitment to operating in strict compliance with current regulations, understanding that any illegal act committed by its employees or collaborators not only affects corporate reputation but may also jeopardize the legal standing of the organization. Furthermore, Undurraga Wine Group has implemented a Compliance Manual for the Crime Prevention Model under Law No. 20.393 to ensure compliance with legal obligations and promote a culture of integrity and transparency in all operations.

Accordingly, it is strictly prohibited for any person associated with Undurraga Wine Group to engage in any act related to the following crimes:

Bribery of National and Foreign Public Officials

As established in Articles 250 and 251 of the Chilean Penal Code:

"A person who offers or agrees to give a public official (national or foreign) an economic or other type of benefit, for the advantage of the official or a third party," in order to:

- Perform duties inherent to their position for which they are not entitled to compensation.
- Omit a duty associated with their position.
- Perform an act in violation of their official duties.
- Take action or fail to act to obtain or maintain an improper business or advantage in any international transaction.

No company representative may offer, promise, or grant financial benefits to national or foreign public officials to obtain business advantages or influence official decisions in favor of the company or a third party.

Example: Undurraga Wine Group paying a public official to expedite the processing of a specific permit.

Money Laundering

As defined in Article 27 of Law No. 19.913:

"Any act intended to conceal or disguise the illicit origin of certain assets, knowing that they originate from crimes related to drug trafficking, terrorism, arms trafficking, child prostitution, kidnapping, bribery, and others."

Therefore, the company strictly prohibits any action aimed at concealing or disguising the illicit origin of assets, particularly those derived from illegal drug trafficking, psychotropic substances, terrorist activities, or the illegal control of firearms. Each of our employees and associates must act with complete transparency and honesty in financial transactions and business operations.

Example: Purchasing high-value goods with cash from an unclear or suspicious origin.

Financing of Terrorism

This is prohibited under Article 8 of Law No. 18.314, which states:

"Any natural or legal person who, by any means, solicits, collects, or provides funds with the intent that they be used to committing any terrorist crime, such as hijacking or attacking public transportation services, attacking the head of state or other authorities, or forming illicit associations to commit terrorist acts, among others."

Example: Making donations, payments, or contributions to entities, suppliers, or institutions linked in any way to terrorist organizations.

Receiving Stolen Goods

This offense is established in Article 456 bis A of the Penal Code:

"Anyone who possesses, under any title, stolen or misappropriated goods, transports them, buys, sells, transforms, or commercializes them in any way."

Example: Purchasing goods that have been stolen.

Improper Negotiations

This offense is defined in Articles 240 No. 6 and 240 No. 7 of the Penal Code. It occurs when a director or manager of a corporation directly or indirectly becomes interested in any negotiation, transaction, contract, operation, or management involving the company, violating legal conditions or the rules governing the duties of directors or managers.

This crime also applies when the aforementioned individuals improperly allow third parties associated with them, their relatives, or companies in which they have a stake (greater than 10% in the case of a publicly traded company) to take an interest in such transactions.

Private-Sector Corruption

This offense is established in Articles 287 bis and 287 TER of the Penal Code. It is similar to bribery but without the involvement of public officials. It punishes both the employee or representative who requests or accepts an economic or other type of benefit, for themselves or a third party, to favor or have favored a specific supplier over others in a business transaction.

Example of bribery: A supplier giving money to an Undurraga Wine Group employee to be selected as the exclusive supplier.

Misappropriation

This crime is defined in Article 470 No. 1 of the Penal Code and penalizes those who fail to return assets received under a legal obligation to do so (such as goods received under deposit, commission, administration, loan, lease, among others), thereby obtaining benefits at the expense of another's loss.

Example: A person or company receives a guarantee consisting of assets or money, then breaches the contract and does not return the guarantee.

Unfair Administration

The crime of unfair administration is established in Article 470 No. 11 of the Penal Code and punishes those who are responsible for safeguarding or managing another person's assets, or part of them, and cause harm by either:

- Abusively exercising powers to dispose of the assets or obligate the owner, or
- Performing or omitting any action that is clearly contrary to the interests of the affected asset owner.

Example: A company representative sells company vehicles at a price significantly lower than their real market value.

Contamination of Hydrobiological Resources

This crime is regulated by Law No. 21.132, Article 136, which penalizes anyone who, "without authorization or in violation of conditions or applicable regulations, introduces or orders the introduction of contaminants, whether chemical, biological, or physical, into any body of water (sea, rivers, lakes, or other water sources), causing damage to hydrobiological resources or affecting underground water tables."

Fraudulent Collection of Unemployment Insurance Benefits

Contained in Article 14 of Law No. 21.227, this crime punishes individuals who obtain unemployment benefits or supplementary payments granted under Law No. 21.227 without being entitled to them, or in a higher amount than they are legally due.

Examples:

- An employee or group of employees continues working for the company while receiving unemployment benefits.
- Employees receive their full or partial salary while also collecting unemployment benefits intended for cases of suspended employment contracts.
- Employees receive supplemental payments for temporary work-hour reductions.

The law also explicitly states:

"Employers that are legal entities will be held responsible for the crimes described in the previous section when they are committed directly and immediately in their interest or for their benefit by their owners, controllers, responsible parties, key executives, representatives, or individuals performing administrative and supervisory duties, provided that the commission of such crimes results from the company's failure to fulfill its management and supervision duties. These companies will be sanctioned with a fine equal to double the amount of the unlawfully obtained benefit and will be prohibited from entering into contracts with the State for two years."

"Under the same conditions, employers that are legal entities will also be held responsible when such crimes are committed by individuals under the direct management or supervision of the subjects mentioned above."

Forcing a Subordinate to Violate Quarantine or Mandatory Health Isolation Ordered by Authorities

As outlined in Article 318 TER of the Penal Code, this rule penalizes employers who, knowingly and having the authority to direct the work of a subordinate, order them to report to their workplace when it is different from their home or residence, and the worker is under mandatory quarantine or health isolation decreed by the health authority.

Arms Trafficking

Regulated by Law No. 17.798, this crime penalizes the possession, carrying, sale, and commercialization of firearms, as well as those who manufacture, import, bring into the country, export, transport, store, distribute, or engage in legal transactions involving firearms without proper authorization. The possession of prohibited or controlled ammunition and related items is also penalized.

Human Trafficking

This crime is established in Article 411 QUARTER of the Penal Code and involves recruiting, transporting, harboring, or receiving individuals for the purpose of exploitation, through means such as violence, intimidation, coercion, deception, abuse of power, exploitation of vulnerability or dependency, or by offering or receiving payments or other benefits to obtain consent from a person with authority over another.

Forms of exploitation include:

- Sexual exploitation (including pornography)
- Forced labor or services
- Servitude
- Slavery or practices similar to slavery
- Organ trafficking

Crime of Timber Theft

This crime is defined in Articles 448 SEPTIES and OCTIES of the Penal Code and involves the theft or unlawful appropriation of logs or timber, being present on another's property without the owner's consent or without legal authorization for logging, as well as forging or using false documents to obtain permits or forms for the illicit transportation or commercialization of timber.

Economic Crimes

The offenses referenced in Law No. 20.393 include those prescribed in Articles 1, 2, 3, and 4 of the Economic Crimes Law, regardless of whether they are explicitly classified as economic crimes under that law.

The following actions are penalized:

- Providing or inducing other employees, external auditors, or risk assessors to submit irregular financial statements, present false information, or conceal data.
- Presenting irregular accounts, false information, or concealing relevant data from the Board of Directors or shareholders.
- Conducting transactions using insider information, including acquiring or selling securities—directly or indirectly, for oneself or others—based on privileged information, or canceling or modifying orders related to such securities. This also includes unlawfully disclosing insider information or advising others to engage in transactions based on such knowledge.
- Acquiring shares without making a public tender offer when legally required.
- Using, for personal or third-party benefit, securities entrusted for safekeeping or their proceeds.
- Acting or using the title of a stockbroker, securities agent, external auditing firm, or risk rating agency without proper authorization.
- Deleting, altering, modifying, concealing, or destroying records, documents, technological supports, or any relevant data, thereby hindering or obstructing oversight by the Financial Market Commission.
- Preventing or obstructing investigations aimed at determining personal liability or that of other employees.

General Prohibition

It is strictly forbidden to engage in any act that could constitute any of the crimes currently or in the future established in Law No. 20.393, which regulates Corporate Criminal Liability.

IV. SPECIFIC ETHICAL STANDARDS FOR COLLABORATORS

Confidentiality of Information

Information is a fundamental asset for business continuity, and must therefore be treated in a timely, truthful, and confidential manner.

Only information that has been expressly authorized by higher management for publication, whether orally, through electronic media, or in writing, will be considered public.

Intellectual property created or acquired by Undurraga Wine Group, such as software, databases and files, among others, is entirely confidential, and it is considered a serious offense to use this intellectual property for purposes other than those for which it was created.

Honesty is fundamental among Undurraga Wine Group collaborators, and for this reason, the assets of collaborators, clients, and the entire company are carefully safeguarded and protected.

Use of Insider Information

Insider information is understood to be any information related to the company or its business that has not been disclosed to the market and whose knowledge, by its nature, can influence the value of its assets. Additionally, any information that Undurraga Wine Group designates as such will also be considered insider information.

To safeguard this type of information, Undurraga Wine Group may request a written confidentiality agreement that must be complied with.

None of our collaborators may use such information, or any other type of information, to obtain benefits for themselves or for third parties.

Conflicts of Interest

At Undurraga Wine Group, honesty is a core value, and all collaborators must identify and avoid situations where their personal interests conflict with those of the company. However, our Group also recognizes the legitimate right of collaborators to engage in activities unrelated to the company, provided these activities do not affect their work at Undurraga Wine Group.

In situations where a collaborator's personal interest may interfere with that of Undurraga Wine Group, the company will take the necessary steps to determine whether the collaborator is disqualified from making a decision regarding the specific process (see Ethics Committee section).

Corruption

Our Group rejects any act of corruption, bribery, money laundering, terrorist activities, fraud, abuse of power, among others. Any evidence of such activities must be promptly communicated to the Ethics Committee, which will file reports with the courts when necessary.

Illicit Drugs and Alcohol

The characteristics of the company require us to have a responsibility towards our customers and our collaborators. For this reason, the consumption of drugs and alcohol is prohibited in all our facilities, with a greater emphasis on our Talagante Winery and the surrounding community. We aim to guide the company towards a culture aware of alcohol and drug consumption, through the

following procedures, thus influencing the reduction of risk factors and problems associated with consumption.

Therefore, it is important that any collaborator voluntarily approaches their superior or any internal entity within the company if they need a support system or guidance. Any collaborator who seeks help due to drug and/or alcohol consumption will not risk their job position. However, they will not be exempt from their work obligations or from legal or criminal actions related to the consumption of drugs and/or alcohol.

Invitations and Gifts

Many of our collaborators may be exposed to receiving gifts or invitations from suppliers or potential suppliers, which in some way, and perhaps unintentionally, may influence a decision, putting them in an uncomfortable situation that may contradict the provisions stated in this Code.

For this reason, Undurraga Wine Group has decided that no collaborator should accept or receive gifts or invitations valued at more than 3 UF.

However, we understand that in exceptional cases, such gifts or invitations may be considered acceptable based on their nature. In these cases, explicit authorization from the General Manager or, in their absence, from the Ethics Committee, must be obtained, and they will decide the final destination of the gift or invitation.

V. SPECIFIC STANDARDS IN RELATION TO SHAREHOLDERS

At Undurraga Wine Group, we strive to offer maximum profitability for our shareholders. For this reason, we will act according to their interests in line with the guidelines provided by our board of directors.

We will provide clear, transparent, truthful, and timely information and will strive to maintain the financial security of the company. To achieve this, as collaborators, we must be prudent in the use of resources, both financial and material, allocated for our work.

VI. SPECIFIC STANDARDS IN RELATION TO SUPPLIERS

Undurraga Wine Group develops a relationship of respect and transparency with its suppliers and contractors. Our suppliers have been with us over the years and are familiar with our evolution, having a strong commitment to our business.

We ensure fair and equal treatment, as we believe that good relationships lead to good results, making them strategic partners for our business.

In the same way, we will ensure that our suppliers comply with all current regulations and meet the required quality standards.

We will prioritize, as much as possible, suppliers who promote sustainable practices.

VII. SPECIFIC STANDARDS IN RELATION TO COMPETITORS

Fair Competition

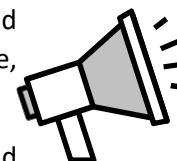
As a Group, we are committed to free and open competition.



We respect fair competition, without plagiarizing concepts used by other competitors in the market or incorporating aggressive messages against them. We promote loyalty, as we believe it is a fundamental aspect for the development of the industry and directly benefits our consumers.

Marketing

We also promote loyalty and truthfulness in our marketing campaigns and promotional strategies by developing our own innovative concepts that, in no case, will be aggressive or damage the image of competitors in the public's opinion.



We base our communication policies and marketing campaigns on our values and ethical principles. We use truthful content in our marketing campaigns, without misleading or encouraging inappropriate behavior.

We reject any advertising or promotional campaign that uses people, especially children, adolescents, or minorities, in immoral, risky, or harmful situations, as well as campaigns that denigrate or belittle individuals or groups, especially based on racial, political, ethnic, religious reasons, or their gender or sexual orientation.

Sales Ethics

We formally and explicitly prohibit unethical sales practices. This principle is the foundation for the development of our commercial activities and sales, and it is well known by the commercial department.

We handle our customers' information respectfully, without compromising their privacy. Therefore, the information we have access to regarding our customers will always be treated as confidential.

We implement safeguards to achieve this objective, such as staff training, access keys to information, and others.

VIII. SPECIFIC STANDARDS IN RELATION TO THE COMMUNITY

Our commitment is to conduct business in accordance with the laws and ethical standards respecting the rights and interests of those outside the company. According to our capabilities, we will contribute to enhancing the social, cultural, and economic heritage of the society in which we operate.

Undurraga Wine Group identifies the communities where it has an influence, evaluates the impacts generated by its productive activities, and develops an action plan to minimize or enhance the negative or positive effects, respectively.

We establish communication channels with the community and its local authorities, which allow us to engage with them. Through these channels, we gather information on the community's

expectations and interests regarding the company, with the aim of working together to develop concrete projects that improve the quality of life of its inhabitants.

We are an open company to the community, and, according to our capabilities, we facilitate the use of our facilities or assist in securing third-party facilities for activities that help the community.

We encourage our collaborators to participate in social projects with the local community. To facilitate this, we provide opportunities for collaborators to engage in this work and participate in these initiatives through the coordination of activities aligned with the institutional goals.

As part of our efforts to cooperate in the development of the community near the company, we prioritize the hiring of suppliers and services offered by the local community, as long as they are available and meet the requirements sought by the company.

IX. HUMAN RIGHTS

Child Labor

As a company, we strongly reject child exploitation and forced labor in all our operations and throughout our entire value chain. For this reason, Undurraga Wine Group does not hire individuals under 18 years of age. This compliance is ensured by verifying the identity and age of each collaborator, in accordance with the applicable legislation.



Forced Labor

We do not accept any form of forced labor or exploitation, as we believe in the fundamental respect for human dignity and consider it unacceptable to force anyone to perform activities against their will.

Discrimination

We do not discriminate, nor do we support discrimination, in any part of our supply chain based on: gender, sexual orientation, age, race, religious belief, political opinions, nationality, individuals with disabilities, or for any other reason unrelated to the tasks to be performed in the position as stipulated by the State and public bodies concerning the labor inclusion of more vulnerable groups.

Harassment

We promote an environment where all our collaborators feel respected and valued, and therefore, none of them should be subjected to workplace harassment, such as bullying, humiliating treatment, social isolation, etc.

We also categorically reject sexual harassment in the workplace, and therefore, any form of inappropriate sexual behavior is prohibited. Sexual harassment is defined as when a person makes unsolicited sexual demands, by any means, that are not consented to by the recipient and that threaten or harm their employment situation or career opportunities.

A worker who is a victim of or becomes aware of a situation of sexual or workplace harassment must file a complaint through the established channels and in accordance with the procedures for investigating and penalizing sexual harassment as defined in the Internal Regulations of Order, Hygiene, and Safety at Undurraga Wine Group.

Furthermore, we prohibit the use of corporal punishment, mental or physical coercion as disciplinary measures, verbal abuse, and inhumane treatment of our collaborators and the people with whom they interact.

Migrants

When Undurraga Wine Group hires foreign individuals, we ensure compliance with current labor legislation. Among other aspects, the employment contract for foreign workers must be signed in Chile before a notary public and must include the minimum provisions of Article 10 of the Labor Code. Additionally, we respect the maximum percentage of foreign workers that an employer can hire.

Employees with Disabilities

Undurraga Wine Group must facilitate the inclusion of employees with disabilities in the workplace, without affecting production processes. The type of work assigned must not represent a potential danger to the hired employee or to their colleagues. Disability is understood as the concept defined by the International Convention on the Rights of Persons with Disabilities, which states that it is a long-term physical, intellectual, or sensory impairment that, when interacting with various barriers, may prevent full and effective participation in society on an equal basis with others.

X. WORKING CONDITIONS AND QUALITY OF LIFE

Equal Opportunities

We provide equal access to positions to eliminate gender wage gaps. Differences in salaries that are objectively justified—such as those based on skills, qualifications, suitability, responsibility, or productivity—are not considered arbitrary. We maintain established job profiles and salaries, seeking to make equitable payments for work of equal value.



Gender Parity

We are committed to gender equality, ensuring there are no arbitrary differences in treatment, conditions, or salaries for our collaborators based on gender.

Healthy Lifestyle

We encourage a healthy lifestyle among our employees and motivate them to replicate it within their families and close circles.

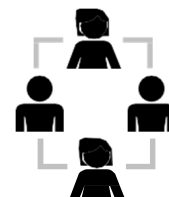
Selection and Development of Our Employees

At Undurraga Wine Group, it is essential that our employees develop both in their current roles and in other areas of their interest, sharing their ideas and concerns.

It is a priority for the Group that each employee, based on their merits and personal motivation, has the space to grow and develop their individual talents.

XI. EMPLOYEE PARTICIPATION

We consider that our main asset is our employees, which is why it is essential to involve them and incorporate their suggestions, ideas, opinions, feedback, etc., in order to improve the management of the company and benefit everyone who is part of it.



To facilitate employee participation, we have communication channels available at the winery and fields, such as suggestion boxes, the whistleblower channel (denuncias@uwinegroup.cl), and the comprehensive personnel management system, among others. All ideas and suggestions are analyzed, and their implementation is evaluated.

On the other hand, we encourage communication between company executives and employees to address topics of mutual benefit, related to management, achieving results, goals, and the work environment.

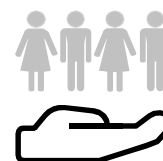
XII. FREEDOM OF ASSOCIATION

Employees of Undurraga Wine Group have the right to freely associate or form unions and to join or leave them, in accordance with the law or their status.

Employees can freely choose their representatives and leaders. No form of discrimination, harassment, intimidation, or retaliation is allowed against those who are part of unions, associations, or other types of employee organizations.

XIII. HEALTH AND SAFETY AT WORK

Having a safe and risk-free environment is a top priority for Undurraga Wine Group. Therefore, to comply with Law 16.744 of the Ministry of Labor, we implement programs that include safety standards, risk prevention, safety talks, health care, emergencies, and others to reduce accident rates. Additionally, we have an Occupational Health and Safety Policy, so that an active and ongoing commitment from the entire organization to this policy enables us to achieve a work environment free of accidents and occupational diseases. To do so, all employees are encouraged to cooperate, assuming responsibility for personal safety and that of their colleagues in order to achieve optimal working conditions in the workplace, with active participation in joint committees to generate a culture of prevention and encourage self-care.



XIV. ENVIRONMENT

At Undurraga Wine Group, we are committed to environmental protection, as well as complying with environmental laws and regulations, both in Chile and in the countries where we operate.



Our commitment focuses on optimizing the use of resources such as water, soil, and energy sources, ensuring efficient practices that reduce environmental impact. We also promote the implementation of strategies that prioritize recycling and reuse, with the firm goal of advancing toward a circular economy model, where waste generation is minimal and aligned with sustainability principles.

We diagnose the main positive and negative impacts that our activities have on the environment, and implement controls to mitigate the negative impacts, including but not limited to:

In the vineyards, we prioritize low environmental impact pesticides, while also respecting the requirements set by the green section of the Sustainability Code, regarding dosage, monitoring, alternation, among others.

We have a wastewater treatment plant that complies with current regulations, maintaining continuous control of liquid waste to prevent water contamination and odors

We manage the consumption of water, electricity, and fuels, maintaining monthly consumption records to achieve established goals and ensuring the efficient and responsible use of these resources.

We have developed a waste management plan, where waste is classified, stored, and disposed of in authorized locations.

XV. APPLICABILITY OF THE CODE OF ETHICS

All the rules contained in this Code of Ethics are mandatory for all employees of Undurraga Wine Group and directly reflect the way of acting that the Company seeks through its corporate culture, as reflected in our Vision, Mission, and Values.

Any violation of the Undurraga Wine Group Code of Ethics is considered an infringement and must be reported to the Ethics Committee as soon as possible. Any information provided by an employee will be kept confidential, and their identity will be protected.

All employees must be aware that it is their duty to report illicit, illegal, or fraudulent conduct that comes to their knowledge. In this way, Undurraga Wine Group will protect, using all available means, the employee who reports such infractions and will not hesitate to sanction those who, out of negligence, convenience, or false loyalty, refrain from reporting such situations.

Every effort will be made to maintain the strict confidentiality of the identity of any employee who reports a violation of the provisions of this Code, to prevent any retaliation against them.

XVI. ETHICS COMMITTEE

Objectives

To establish the company's general policies, define the principles and basic behaviors that must guide our actions during our work. This ensures that we have the peace of mind and confidence that we are acting appropriately and consistently with the Ethical culture of Undurraga Wine Group.

Members

The Ethics Committee will be composed of the General Manager, the Quality Assurance and Environment Submanager, the Head of Remuneration, the Head of Wellbeing, a Board Member, and one member chosen by the General Manager from the management area to which the whistleblower belongs.

Operation

The Ethics Committee will meet regularly once a month, as long as complaints have been received in the previous month that require analysis and resolution.

The Ethics Committee will be responsible for ensuring compliance with the stipulations in this Code. It will also be responsible for studying and proposing solutions to the Board regarding complaints and conflicts arising from alleged violations of the Code and, if necessary, proposing actions or measures to correct such matters, which in extreme cases may involve the removal of the employee from their position.

This committee will also play a consultative role, allowing employees to clarify ethical doubts and ask questions whenever they deem appropriate.

Any employee may, through any of the members of the Ethics Committee, via email, letters, or in person, make inquiries or provide information regarding non-compliance with this Code, which will in all cases be handled with absolute confidentiality and discretion.

The Ethics Committee is responsible for ensuring the proper dissemination and implementation of this Code of Ethics and Conduct, which must:

1. Provide the Code to all employees of Undurraga Wine Group, and each must sign the commitment letter for the Code of Ethics and Conduct, declaring knowledge of every part of its content.
2. Promote the values and behaviors outlined in the Code of Ethics and Conduct.
3. Resolve issues within the organization and channel these issues accordingly.
4. Be aware of employees' rights and establish clear and coherent internal policies (See annex of Internal Policies).
5. Review requests for clarification on specific situations of individuals within Undurraga Wine Group.
6. Review and resolve complaints according to the guidelines in this Code, respecting the rights of employees, especially the right to be heard, to defend themselves, and to ensure that any resolutions made against them are duly substantiated.
7. Issue circulars and instructions necessary for the development and enforcement of the provisions in the Code of Ethics and Conduct.

XVII. ANNEX INTERNAL POLICIES UNDURRAGA WINE GROUP

Sustainability Policy

We aim to be a sustainable company that develops its activities achieving a balance in the social, environmental, and economic realms, with a primary focus on caring for the natural environment in which we live and the efficiency in the use of energy resources.

To achieve this, Undurraga Wine Group is committed to:

1. Complying with environmental legislation and regulations that it voluntarily adopts with an environmental commitment, applicable to its activities, products, and services.
2. Preventing the deterioration or degradation of the environment in all company activities and production processes.
3. Ensuring that the development of the community and our employees evolves towards continuous improvement. We believe that if our human capital grows in knowledge and in the improvement of its quality of life, Undurraga Wine Group will also improve in all its areas.
4. Continuously improving the company's environmental management with the goal of progressively reducing the environmental impacts of the production process, by using the most appropriate available technologies, incorporating eco-design, higher-efficiency equipment, and recycled products or packaging, enabling the reuse of these.
5. Actively encouraging contractors and suppliers of the company to have environmental concern, awareness, and performance.
6. Promoting environmental awareness among all employees, fostering the use of environmental practices that allow sustainable development, respecting and protecting flora and fauna.
7. Natural land resources (soil, water, flora, and fauna) will not be intervened with or used unless in a way that ensures the sustained achievement of their usage capabilities, so as not to compromise their balance or integrity.

Sustainability Policy for Wine Tourism

In the Tourism and Events Area of Undurraga Wine Group, we are committed to sustainability and environmental care. Our commitment is to ensure that the activities we carry out are responsible and sustainable, complying with current environmental and social legislation, committed to our value chain, working closely with stakeholders, and ensuring customer satisfaction.

We strive to minimize the environmental impact of our activities by implementing sustainable practices in operations, including the optimization of water and energy resources, responsible waste management, and promoting ethical and fair business practices within the value chain. We also work with suppliers and contractors who share our vision and commitment to sustainability.

Regarding customer satisfaction, we are dedicated to offering high-quality products and services and ensuring a unique and memorable wine tourism experience while caring for the environment. We aim to maintain effective communication with customers, actively involving them in promoting sustainable practices to understand and simultaneously encourage environmental education and awareness.

This sustainability policy is based on the belief that we can be a profitable company while respecting the environment, being socially responsible, and being committed to our stakeholders. We are committed to continually improving our processes to comply with this policy, measuring and reporting our environmental and social practices in a transparent and responsible manner.

Quality Policy

Undurraga Wine Group, a company dedicated to the production and commercialization of wines, maintains the unique characteristics of the vine through its processes, striving for excellence in its operations and product quality.

Undurraga Wine Group directs its actions toward customer satisfaction through the maintenance of our existing brands, timely and satisfactorily meeting their requirements, and delivering quality and safe products, complying with applicable legislation in a continuous improvement environment.

Undurraga Wine Group is committed to preventing environmental pollution and properly managing our waste.

To achieve this:

- We will promote long-term responsibility-based relationships with our customers, providing products that meet their requirements and expectations.
- We will develop and maintain a human resource management system that allows us to achieve and maintain a high level of productivity, ensuring the quality of our products and the motivation of our employees.

Communications Policy

Considering that communication is a fundamental pillar in our business, that the organization's objectives belong to all our employees, and that we work for the common good of being a sustainable company, Undurraga Wine is committed to:

1. Supporting decisions and the achievement of organizational objectives by fulfilling the commitments made.
2. Acting with integrity in everything we do, always complying with current laws for the benefit of individuals and the community.
3. Respecting others legitimately, accepting people despite differences, without any form of discrimination, and always showing consideration for the individual conditions of others.
4. Achieving transparency and accuracy in communications, generating trust, honesty, and a constructive mindset, developing and enriching networks with people interacting internally and externally, reaching agreements and commitments, and maintaining active participation in wine industry activities, both nationally and internationally.
5. Maintaining formality, seriousness, and transparency in commercial relationships, as well as in sales campaigns and sponsorships. Additionally, all developed material should be created with our communication policies and organizational guidelines in mind.
6. Providing responses to internal and external customers in optimal time and quality, delivering solutions that foster long-term, trust-based relationships.
7. Keeping our stakeholders informed, as well as the final consumer, through reports, press releases, and general communications, permanently building customer and intermediary loyalty.
8. Being friendly and maintaining good interpersonal relationships with suppliers, intermediaries, and various sales channels.
9. Acting responsibly regarding alcohol consumption, ensuring that communications and campaigns do not directly promote its consumption and informing about health precautions according to national and international standards to all our employees, customers, community, and others.

Corporate Social Responsibility Policy

Undurraga Wine Group has developed a commitment to its various stakeholders, aiming to demonstrate high economic, social, and environmental performance.

The transparency of our activities is a fundamental trust asset in today's world and in business relations with the different markets in which we operate.

Thus, our Corporate Social Responsibility Policy is built from:

- Our Corporate Policies.
- The Universal Declaration of Human Rights.
- The BSCI Principles (Business Social Compliance Initiative).
- The OECD Guidelines for Multinational Enterprises.
- The quality standards of our operations.

The commitments made with our main Stakeholder Groups are:

- Respecting and caring for the environment in all our operations.
- Maintaining continuous communication with our neighboring communities.
- Ensuring an environment that safeguards the health, safety, and quality of life of our employees.
- Being an excellent corporate citizen by respecting national and international legislation.
- Continuously improving all our social and environmental processes.
- Complying with guidelines regarding acts of corruption and bribery according to the OECD guidelines for multinational companies.

This policy extends to all company operations and to our suppliers and contractors.

Human Resources Policy

For Undurraga Wine Group, one of the pillars of success is having high-performance internal collaborators who meet the challenges and demands of the markets in which we operate.

The following policy stems from the strict compliance with:

- Our principles and corporate culture.
- National and international labor legislation (ILO conventions ratified by the country).
- The Universal Declaration of Human Rights.
- The Code of Ethics.

The commitments of Undurraga Wine Group to our employees are expressed through:

- Competency-based selection processes.
- High occupational health and safety standards.
- Development of the skills and capabilities of our employees.
- Respect for the representative organizations of our employees.
- Zero tolerance for child labor in our operations and those of our suppliers and contractors.
- Maintaining a healthy environment that provides quality of life for our employees.
- Fostering an appropriate work environment that allows the achievement of business objectives.

This policy applies to all employees of Undurraga Wine Group and must be part of the compliance of external companies working on the company's premises.

Undurraga Wine Group has communication channels and procedures in place to ensure the compliance with this policy.

Diversity and Inclusion Policy

For Undurraga Wine Group, diversity, inclusion, and non-discrimination mean providing everyone with the opportunity to contribute to society on equal terms based on their competencies, skills, and abilities, without environmental barriers that prevent their development.

We understand that the inclusion of diversity involves acquiring different perceptions, consequently providing added value to the company by promoting new visions, which in turn improves the quality of the products we create and deliver to the customer.

Undurraga Wine Group promotes dignified treatment and a respectful environment for all individuals associated with the organization, its subsidiaries, and visitors, rejecting all forms of discrimination based on race or ethnicity, nationality, socioeconomic status, language, political ideology or opinion, religion or belief, union membership or participation in professional organizations, or the lack thereof, gender, sexual orientation, gender identity, marital status, age, affiliation, personal appearance, illness, or disability.

Occupational Health and Safety Policy

Undurraga Wine Group expresses its intention to maintain a Health and Safety Management System that protects the life and health of employees. To achieve this, we have formulated our Occupational Health and Safety Policy, which aims to protect the health and well-being of our personnel, achieve high levels of quality and efficiency in work, and maintain a continuous improvement process that will be systematically evaluated to verify its compliance and development.

Undurraga Wine Group states that its Health and Safety Management System:

- Is the responsibility of each management and supervisory level. They are accountable for safeguarding individuals, as well as maintaining equipment and the work environment.
- It is the obligation of all employees to practice self-care, safeguarding their health and that of their coworkers. All individuals must ensure that safety regulations, procedures, and standards are followed.
- All actions carried out in our company, including at the Talagante Plant and our agricultural estates, aimed at identifying hazards, evaluating, and controlling operational risks, are mandatory for the staff of Undurraga Wine Group, contractors, and subcontractors, who must be committed to our Occupational Health and Safety Policy.

Undurraga Wine Group believes that the Health and Safety Management System will only be effective if:

- Compliance with current legislation on workplace accidents and occupational diseases is ensured, environmental protection is respected, and operational efficiency is improved.
- The action plans stipulated in our Health and Safety Management System are followed by each level of the organization.
- There is full commitment and conviction from all company personnel, contractors, and subcontractors, without exception. To achieve the objectives set out in our Occupational Health and Safety Policy, teamwork and close cooperation from all participants in our company are essential.