

**CODE OF CONDUCT
AND ETHICS**

VIU MANENT





Viu Manent, in a new milestone that falls within the strategic objectives of the organization, has set itself the task of developing and disseminating its Code of Ethics and Conduct to all its stakeholders. This document will clearly state the ethical principles that govern the organization, delivering the guidelines of conduct to its collaborators in the areas established by the BSCI initiative and the OIT's guiding principles. Without further ado, it is expected that this instrument will complement what has been expressed since 2013 in the Internal Hygiene and Safety Regulations, since it exposes other complementary topics.

Preservation and respect for the environment, fair treatment of employees and commitment to the community are a constant at Viu Manent that is applied throughout its production and supply chain.

INTRODUCTION



PHILOSOPHY

What is your own? ... "That which makes us recognize ourselves"

We love roots, family and traditions, we love work understood as the engine to achieve dreams. We believe in transcendence, in getting involved with the heart and doing things well is always the best option.

We are in love with wine, with its lively and sensitive essence, we have strong ties with it. We believe in Chile as a privileged territory for winemaking, in Colchagua as a magical valley where the land, the climate and the grapes seem blessed.

- ✓ Creemos en cuidar los detalles y ser respetuosos con nuestro medio ambiente.
- ✓ We believe in history and tradition as knowledge and experience and in innovation and modernity as a complement to move towards a goal.
- ✓ We believe in teams, in talented, professional and committed people.
- ✓ We believe that our commitment is to transmit this philosophy to our daily mission.

VISION

We aspire to be among the 5 best Chilean wineries in terms of prestige, quality, distribution, service and closeness to customers.

MISION

Produce outstanding wines, be consistent with quality, take care of details and print the seal of concern that the family and a highly professional and committed team put on the quality of Viu Manent wines.

This team achieves, through experience and with an innovative spirit, the maximum expression of Colchagua and Chile in outstanding wines with their own style that satisfy the demands of world consumers, contributing to the prestige of Chilean wine.

CORPORATE MANAGEMENT POLICY

SUSTAINABILITY - QUALITY AND SECURITY FOOD - ENVIRONMENT

Strategic and Philosophical work pillars that ensure the commitment to our community, clients, partners, and the sustainable development of our country.

We are committed to:

1. Developing our activities within the framework of applicable regulations, both principles and agreements signed voluntarily.
2. Developing constantly to continue improving our Management of Quality and Sustainability, with indicators that allow us to evaluate and verify at any moment that our wines meet the specifications of legality, safety, authenticity, and quality.
3. Satisfying the expectations and requirements agreed upon with our clients, of quality, quantity, and opportunity.
4. Complying with the obligation to produce wines under the standards of Food Safety, conforming to the sector's legal requirements as well as meeting the responsibility for our clients.
5. Upholding just labor practices, in a safe and healthy work environment.
6. Encouraging the professional competitiveness of our team, recognizing skills and strengths within job performance, offering training and opportunity for professional growth within our company.
7. Participating in cross-industry alliances to contribute to society, through initiatives for the sharing of knowledge, innovation, social inclusion, environmental education, and the conservation of biodiversity.
8. Acting within the framework of Social Responsibility in a manner consistent with our corporate values, the Principles of the UN Global Pact, international standards, and the best practices of the industry.

JOSE MIGUEL VIU BOTTINI- GENERAL MANAGER

31 January 2019

Viu Manent invites all its stakeholders to review its Code of Ethics and Conduct, which establishes the principles relating to the relationship with its workers, customers, suppliers, governments, the community and the environment. Inviting that, as part of an industry that seeks to differentiate itself, apply the principles set forth here in their own operations.

SCOPE

This Code of Ethics and Conduct applies to all Viu Manent operations, so its collaborators must know it and comply with their obligations.

This Code was not designed to address all possible situations, nor as a compendium of all laws, regulations, and policies that could affect the Organization. Therefore, under no circumstances should this Code be understood as replacing or repealing other internal policies and / or procedures, but rather complements and / or integrates with them.



SCOPE

PROHIBITION OF CHILD LABOR

Viu Manent disapproves of all types of child labor and practices that could threaten their dignity, safety and integral development.

Viu Manent will only hire young people over 16 years of age who, complying with their professional practices and under the unrestricted authorization of their parents and the educational entity to which they belong, must comply with this process. In addition, they will be assigned light and daytime tasks, thus worrying about complying with the legal requirements in relation to the employment of young people. Special care will be taken to provide them with the personal support of a tutor, understanding that these workers are just starting out and that they may present greater physical and psychological vulnerability than an adult.

SEXUAL HARASSMENT

Sexual harassment is an illegal conduct, not in accordance with human dignity and contrary to coexistence within any organization. For this reason, Viu Manent rejects and condemns all types of acts of this nature and urges all its staff to avoid compromising conduct and report it in the appropriate instance.

Manent undertakes to accept and investigate any complaint in order to clarify facts and maintain a pleasant work environment among its collaborators. In the same way, it will protect those employees who have been victims of such behavior, providing them with the support they need.

PROHIBITION OF FORCED LABOR AND MANDATORY DISCIPLINARY MEASURES

Any type of non-consensual work constitutes a denigration of the person who is being forced to do it, slavery being the most extreme case. In this sense, Viu Manent will ensure that all its activities are carried out in an environment that respects the basic rights of workers and will not allow abuses or compulsory disciplinary measures of any kind.

WORKING CONDITIONS AND OCCUPATIONAL HEALTH AND SAFETY

Every time a collaborator starts working at Viu Manent, an employment contract will be drawn up, in which the duties and rights of both parties will be clearly established, delivering the corresponding copies so that each of the parties has the support of the agreement.

Viu Manent will deliver remunerations equal to the legal minimum, higher and / or industry standards in terms of salary payment. Each collaborator will be given a receipt of the payments made so that they can review their order and, in case of doubt, consult with the company. Working hours will be established that comply with the working hours stipulated in the law and that do not exceed 45 hours per week + 10 overtime hours. In all aspects, it will seek to avoid overload of workers.

Viu Manent is concerned that all its collaborators remain in the best conditions of physical and mental health. To do this, it will continually strive to establish a culture of self-care, understanding that this technique is the most effective for making its employees aware of the risks associated with each of the tasks they perform. You will have the support of an expert in risk prevention and you will be a member of one of the mutuels that administers accident insurance for workers in compliance with Law No. 16,744.

Viu Manent will deliver all the personal protection elements that result from the risk analysis of each task, promoting through induction talks its use and all those behaviors that allow achieving the objective of minimizing accidents and occupational diseases.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Viu Manent recognizes the value of employees being organized and represented. Supports permanent dialogue to generate bonds of trust and fair relationships. This is how Viu Manent will not oppose the existence of organized groups of workers within its operations; It will provide the necessary facilities for them to meet and attend to their needs and concerns.

In no case will Viu Manent adopt arbitrary or unjustified measures of intimidation, discrimination, harassment towards union leaders, allowing them to freely fulfill the duties of the position for which they were elected.

PROHIBITION OF DISCRIMINATION

Viu Manent will reject any arbitrary discrimination in the workplace. Each of the collaborators will enjoy equal opportunities and treatment, regardless of their ethnic origin, religion, nationality, color, marital status, age, political opinion, sex, physical disability or others.

USE OF ASSETS AND INFORMATION

Viu Manent's assets, facilities and financial resources will be used solely to fulfill its mission. The principles of efficiency, security, rationality and savings will be adopted. All information to which collaborators may have access in the development of their work will always be confidential and may only be used for purposes related to work within the Organization. The use or delivery of the information to unauthorized third parties is prohibited, as well as the use of said information for their own benefit or for the benefit of third parties, in a manner contrary to the provisions of the law or in a way that is detrimental to the interests of the company business or from your customers or suppliers.

Viu Manent undertakes to carry out marketing and advertising of its products always indicating real and verifiable data, avoiding the use of phrases that incite the consumer to error or invite the consumption of its products to a population likely to cause harm, for example, minors, elderly or pregnant women.

CORPORATIVE GIFTS

Viu Manent only accepts gifts for advertising purposes, avoiding compromising the reputation of both parties.

Viu Manent understands that any of its suppliers, within its public relations policy, may make a gift to collaborators, however, it will ensure that it does not agree with any type of commitment and / or affects the relationship of the parties.

When the offer considers technical tours financed by suppliers, Viu Manent will analyze the possible conflicts of interest that may be generated and the real technical value that said instance will generate, deciding whether the collaborator is authorized to participate or not.

It is established that donations, payments or gifts may not be made to people, political parties, institutions, companies, public institutions or any other in order to secure a business or obtain influence in their decisions.

COMPLIANCE WITH THE LEGAL REGULATORY FRAMEWORK

Viu Manent declares its unrestricted adherence to and compliance with all applicable legal regulations in the different areas in which it operates, whether labor, tax, environmental or any other that make up the legal system of the Republic of Chile.

GENERALITIES

In relation to general questions that the collaborators, Viu Manent:

- ✓ It will promote fair internal and external competition as a business value, stimulating the interaction of ideas among its collaborators and respecting the position of its competitors.
- ✓ Encourage teamwork and the formation of internal networks in which everyone contributes their knowledge and experience.
- ✓ You will prioritize the overall results of the organization over individuals and will not sacrifice long-term results for short-term ones.

Just as this Code of Ethics and Conduct constitutes a guide on how the organization will act in multiple situations, it is in your interest to establish what the minimum framework of action will be for your collaborators. This is how Viu Manent collaborators are expected to:

- ✓ Know the Mission of the company and actively contribute to its achievement.
- ✓ Know and comply with the provisions of this Code of Ethics and Conduct.
- ✓ Know, understand and comply with other policies and Regulations (eg Internal Hygiene and Safety Regulations).
- ✓ Respect the guiding principles of human rights and report any possible violation of them.
- ✓ Fully comply with the duties to which they have undertaken, using their talents, sharing their knowledge and experience for the benefit of the company.
- ✓ Use in a good way all the means that have been delivered to your charge, always seeking efficiency and good sense in their use.
- ✓ Make the most of the opportunities that Viu Manent will give you in your personal and professional growth.
- ✓ Practice self-care at all times, evaluating the risks in each task and using the corresponding protection elements.
- ✓ Participate in the growth of the company by communicating detected irregularities and proposing improvements.

RELATIONSHIP WITH CLIENTS

The satisfaction of our clients is one of the principles that illuminate the actions of Viu Manent, therefore all the actions of the collaborators must tend to satisfy their needs.

Viu Manent understands, attends and satisfies the needs of its clients, offering products and services of the highest quality, under competitive conditions. Likewise, the responses to your requests and eventual claims will always be resolved in a timely and efficient manner.

The sale of the Company's products and services must be done honestly, avoiding all kinds of collusion and the use of deceptive or fraudulent strategies. It is never intended to obtain undue advantages from our clients, in order to obtain a temporary benefit. The relationship with our clients must focus on generating long-term relationships based on mutual knowledge and trust. Viu Manent employees will comply with and enforce with diligence and good faith the different contracts that the Company signs with clients, grape growers, wine producers and other suppliers. The exchange of customer information will be accepted only and exclusively when there is reasonable knowledge that it is being received and used within the framework allowed by applicable law and Company policies.

RELATIONSHIP WITH SUPPLIERS

All equipment, raw materials, dry materials, supplies, services and the like will be acquired through selection processes that will consider the search for the best solution to the problem raised. In this process, the confidentiality of commercial information will be respected to the maximum and it will be prohibited to generate undue competition between suppliers, as a result of the undue exchange of data.

Producers, suppliers, sellers, consultants, contractors and subcontractors of grapes and wine shall receive fair and equitable treatment, without arbitrary discrimination.

The choice and contracting of suppliers must always be based on technical, professional, ethical criteria and the needs of the company, choosing their proposals through objective factors, such as competition, opportunity, price and quality. Viu Manent refuses to negotiate with companies or people about whom there is a reasonable doubt about their probity or ethical principles.

CONFLICTS OF INTEREST

In case of conflicts of interest, real or presumed, in dealing with producers, suppliers, clients and other persons who have commercial relations with the Company, the directors, executives and affected collaborators must declare them expressly and in a timely manner. and transparent, so that Viu Manent can make the corresponding decisions.

Conflicts of interest may arise when Company employees who hold decision-making positions, as well as their spouses or family members, have a significant investment or a directive or managerial position with which Viu Manent maintains business relationships. For these purposes, a conflict of interest will be understood to be the incompatibility that occurs in any act or negotiation between Viu Manent and a related person, when there are business relationships, kinship or affection between whoever evaluates, performs or decides said act and / or participates in the administration, supervision or control of the processes derived from it, and of the related party, and this relationship implies a lack of independence or impartiality in decision-making, all of which increases the possibility of directly or indirectly benefiting the related person and / or the Company's collaborators who participate in decision-making. In the same way, it will be understood that it is a conflict of interest, defined or established as such in the applicable legislation. In all these aspects, the provisions of current legislation will be followed.

Viu Manent is committed to caring for the environment and pursues as the central axis of management throughout its entire production chain, always seeking to comply with the regulations that govern in this area. It will pay special attention to Law No. 19,300 on General Bases of the Environment, from which it will adopt its basic premises and make them its own in environmental matters, taking care of working for:

- ✓ The right to live in a pollution-free environment
- ✓ Environmental protection
- ✓ The preservation of nature
- ✓ Conservation of environmental heritage

Consequently, all collaborators undertake to carry out their operations and provide their services, taking care to minimize, whenever possible, their impact on the environment and, in any case, to comply with the requirements of current legislation.

Viu Manent will urge employees to inform their direct management of situations that go against this guideline to find the best solution in the shortest time and reduce possible environmental damage.

Viu Manent environmental management will be addressed as a comprehensive work policy and its main guidelines will address:

- ✓ Continuous improvement of environmental performance, reducing the environmental impact of its production and marketing processes, with an emphasis on reducing the consumption of water, electricity and fuels, as well as reducing the emission of greenhouse gases (GHG).
- ✓ Efficiency in the use of dry materials and supplies, as well as the incorporation of practices and technologies that generate a relative reduction of all their consumption.
- ✓ The implementation of the energy efficiency concept in its agricultural and operational processes.
- ✓ A water resources management plan, in order to minimize the use of water in the different processes.
- ✓ Conserve the biodiversity of the fields, adopting measures to protect the fauna, flora and soil.
- ✓ The treatment of all the liquid industrial waste generated and the search to reduce the amount of solid waste.
- ✓ Spread the concept of caring for the environment to the largest number of employees.

Viu Manent supports operations in the Colchagua Valley and watches over at all times so that any impact generated in the area is always positive, trying to offer quality jobs to the inhabitants of the sector and always ready to dialogue in search of actions that improve their quality of life.

RELATIONSHIPS WITH THE COMMUNITY

Viu Manent's strategic line is to contribute to the development of the surrounding communities through the hiring of labor from the sector and the selection of suppliers of local goods and services. The company will always maintain an attitude of care and constant dialogue to develop activities in conjunction with the communities.

Viu Manent will support, whenever it is within its reach, the integral development of the communities in its radius of action, seeking to establish itself as a support, but making it clear that this participation will not translate into a dependency of the community towards the company. The company will promote a healthy life and the prevention of the excessive consumption of drugs and alcohol in its operations, a situation that will be extended to the community by involving the families of the company's workers.

COMMUNITY

In accordance with Law No. 20,393, which establishes the criminal liability of legal persons for the crimes of money laundering, financing of terrorism and bribery of national or foreign public officials, the company may be responsible for the commission of the aforementioned crimes in the previous. Law, by workers and dependents in the scope of their functions.

In consideration of the foregoing, Viu Manent expressly prohibits any conduct that may give rise to criminal prosecution of the company under Law No. 20,393 for acts committed by the Owners, Controllers, Directors, Managers, Senior Executives, Representatives, who carry out administration or supervision activities and any collaborator of the company or external that represents the same.

Likewise, it includes natural persons who are under the direct direction and supervision of any of the aforementioned subjects and, in general, all employees of the company.

The values and principles disseminated by the company are aligned in order to avoid any activity that violates its values and principles.

CRIMES

Manent expressly prohibits its internal and external collaborators from carrying out any act that may constitute the following crimes:

- ✓ Money Laundering: As established in Article 27 of Law No. 19,913. "Any act tending to hide or disguise the illicit origin of certain goods, knowing that they come from the commission of crimes related to illicit drug trafficking, terrorism, arms trafficking, promotion of child prostitution, kidnapping, bribery and others".
- ✓ Financing of Terrorism: As established in Article 8 of Law N°18,314. "Natural or legal person, who by any means requests, collects or contributes funds in order to be used in the commission of any terrorist crime, such as seizure or attack on a means of public transport in service, attack against the head of state and other authorities, illicit association with the purpose of committing terrorist crimes, among others".
- ✓ Bribery of a national public official: As established in article 250 of the Penal Code. "It is said that it offers or undertakes to give a public employee an economic or other benefit, for the benefit of him or a third party":
 - Perform acts of their position for which no rights are indicated.
 - For having omitted an act of his office.
 - For having carried out an act in violation of the duties of his office.

- ✓ Bribery of a foreign public official: As established in article 251 of the Penal Code. "It is said of the one who offers, promises or delivers to a foreign public official an economic or other benefit, for the benefit of him or a third party":
 - Take an action or incur an omission with a view to obtaining or maintaining any undue business or advantage in the field of any international transaction.

The Government of Chile, as well as those of the countries of destination of the company, are important entities in the actions of Viu Manent. They, through their multiple divisions, provide regulatory frameworks for production and marketing. By virtue of this, the company will always study and apply the best solutions, understanding that working within the established will result in the common good.

RELATIONS WITH THE GOVERNMENT

The focus of attention in the Government-Company relationship is related to the legal framework. In this sense, Viu Manent will comply with and promote all its stakeholders so that they comply with all laws, regulations and other legal bodies that apply to its activities.

Viu Manent will maintain special care in international commercial exchange operations, in which it will comply with Chilean legislation as well as that of destination countries.

RELATIONSHIP WITH GOVERNMENT OFFICIALS

Workers who have within their functions contact and carry out procedures on behalf of the company with public entities must:

- ✓ Implement the ethical guidelines of the company at all times.
- ✓ Relate with respect and seek good care.
- ✓ Always be friendly and open to dialogue.
- ✓ Show moderation and control in the delivery of arguments and / or in the reception of government communications, whether of any nature or scope.

The Ethics Committee is responsible for ensuring the proper dissemination and application of this Code of Ethics and Conduct, so it must:

- ✓ Promote the values and behaviors that are promoted in the Code of Ethics and Conduct.
- ✓ Be an advisory body.
- ✓ Facilitate the resolution of conflicts related to the application of the Code of Ethics and Conduct, arbitrating between the parties.
- ✓ Know and resolve complaints in accordance with what is stated in this Code, respecting the rights of employees, especially the right to be heard, to defense and that the resolutions issued against them are duly founded.
- ✓ Channel special cases to the appropriate instance.
- ✓ Propose updates and modifications to the Code of Ethics and Conduct.
- ✓ Review requests for clarification of specific situations raised by a collaborator.

To comply with this code, Viu Manent has appointed as members the:

- ✓ General Manager
- ✓ Corporate Director of Administration and Finance
- ✓ Administration and Finance Manager
- ✓ Head of Administration and Accounting
- ✓ Head of Quality and Sustainability