



CODE OF ETHICS AND _____ CONDUCT VIÑA VALDIVIESO

The history of Valdivieso goes back to 1879, the year when Mr. Alberto Valdivieso founded Champagne Valdivieso and became the first producer of sparkling wines in Chile and South America. After a century since its foundation, Valdivieso began to commercially produce still wines at the Lontué winery, in the Curicó Valley. Actually Viña Valdivieso has a high quality portfolio of wines and continues searching for the best terroirs in Chile.

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

AREA OF APPLICATION.

This Code of ethics and conduct will be applicable to all persons linked to the operations of Viña Valdivieso, including its Board of Directors, Executives, and Workers, who must be aware of it. The Code of ethics and conduct will be an integral part of the legislation and regulatory framework that govern us in all the limits of our organization.

This Code of ethics and conduct was not designed to cover all possible situations, nor as a compendium of all laws, regulations and policies that affect the Company. Therefore, under no circumstances should it be understood that this Code replaces or repeals other internal policies and / or procedures, but instead it complements and / or integrates with them.

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ABOUT THE WORKERS OF VIÑA VALVIVIESO.

Directors

The directors of Viña Valdivieso, to ensure compliance with the Code of ethics and conduct, are responsible for:

1. Have the commitment to lead and manage responsibly, ensuring the success of the business taking care of the values and ensuring the good performance and care of each worker.
2. Ensure compliance with legislation and company policies as well as procedures in the performance of their duties and leadership.
3. Ensure the safety of its workers, their health and well-being in fulfilling the functions.
4. Take care of relationships with customers and suppliers, ensuring compliance with agreements and documents resulting from business relationships.

Executives and workers

All Executives and Workers of Viña Valdivieso, to ensure proper behavior, must keep in mind their obligations:

1. Observe honorable and irreproachable conduct.
2. Always comply the laws, rules and regulations applicable to the activity and your position.
3. Respect and act in accordance with the dignity of the people with whom you must relate, be these directors, executives, workers, contractors, subcontractors, suppliers, authorities or customers.
4. Perform the work entrusted with the greatest efficiency and diligence, fully fulfilling their obligations, in a spirit of collaboration and improvement and avoiding compromise the health, integrity and safety of itself and other workers.
5. Keep due loyalty to the Employer, in its various aspects, which includes, among others: keep strict reserve of all those matters that come to its attention on the occasion of the provision of services to the Employer and the operations carried out by the Vineyard whose disclosure could cause damage to it, avoid and prevent any action aimed at causing damage to the information kept by the Employer in any medium.

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6. Maintain strict and timely compliance with the instructions, policies, regulations and orders issued by the Employer or any of its representatives, carrying out all those activities that, directly or indirectly, are related to the function it will perform and that are necessary for fulfill the work for which he/she was hired in an adequate, efficient and timely manner.
7. Inform your immediate superior, or any relevant official, of any breach or possible breach of the law or policies, including any violation of this Code. Provide in a timely manner all the cooperation that is required with the audit procedures aimed at determining compliance with the standards applicable to Viña Valdivieso.

General prohibitions

1. Reveal, disseminate or use information, data or background of the Vineyard, or that relate to it, whether for personal or third party benefit, regardless of the way in which they are accessed, even if they have not been commissioned Reserve on them.
2. Cause unauthorized alterations or modifications in the computer systems, load unauthorized software or programs on the equipment, disclose or provide to third parties, or Company personnel not authorized to do so, passwords, keys, programs and any other information contained in the systems and, in general, incur, through action or omission, any adulteration of said systems and their information.
3. Misuse and / or retain documentation, money, checks or trade effects of the Vineyard.
4. Submit to perform their duties while intoxicated, or under the influence of drugs or alcohol.
5. Do not use directly or indirectly, for your own benefit or those of third parties other than the Company, the resources that are within your reach in the development of your activities or as a result of your charges.
6. As a general rule, offer or give gifts to public and / or private officials, when such gifts could be perceived as incentives, when such action represents a breach of the laws, regulations and policies of the Company, or when such action could bother or negatively affect the image and reputation of the Vineyard.

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Conflicts of Interests

In order to ensure a transparent, secure and stable business relationship over time, Executives and workers should keep in mind the following:

1. Refrain from providing services, permanent or sporadic, to other companies or individuals, within the time that must provide services to the Company and, in no case, to entities that have the same or similar business or are the responsibility of the Vineyard.
2. Not to carry out, on their own or third party, any negotiation that is of the business of the Employer's own business. Any operation, business or work of the worker that involves acting in the same sphere of business activities of the Employer will be considered as negotiation of the business.
3. Not be affected independence, impartiality or personal gain on the occasion of business relations of the company.
4. Refrain from receiving gifts, invitations to travel and other manifestations offered by customers and / or suppliers that jeopardize independence, objectivity and transparency in business relationships.
5. Ensure that the choice and contracting of suppliers is based on formal, professional and technical criteria with the focus on the benefit to the Vineyard, in a fair and transparent choice respecting the internal procedures defined for these operations.

LABOR RIGHTS.

In order to ensure due adherence to worker's rights, Viña Valdivieso is responsible for:

1. Respect and ensure compliance with labor legislation in all its aspects and all those regulations that are the regulatory framework of our management.
2. Protect the workers right, taking care of working conditions, compensation paid for the work/ function that develops and promotes job stability.
3. Respect the labor legislation (Art. 13 of the Labor Code), regarding child labor and does not promote the work of minors.
4. Prohibit discrimination in the workplace. Each worker will enjoy equal opportunities and treatment, regardless of ethnicity, religion, nationality, color, marital status, age, political opinion, sex, physical or other disability.

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5. Prohibit and reject sexual or labor harassment behaviors, or those involving situations of forced or compulsory labor, or those that may result in a violation of the fundamental rights of workers.

RELATIONSHIP WITH CUSTOMERS, SUPPLIES AND COMPETITORS.

Clients and suppliers:

The Company will ensure the relationship with the suppliers of goods and services in an ethical and lawful manner.

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

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

The Company guarantees its products (Sparkling wine and still-wines), looking for excellence in quality and makes available to its customers and consumers the opportunity to respond to the possible claims of them in a fast and effective way in order to seek the full satisfaction of our customers and consumers in the long term.

Competitors:

The Company will ensure fair competition with other companies in the field, always framed in mutual respect, refraining from unfair practices, such as collusive agreements, abuse of dominant position and predatory practices.

CRIMINAL RESPONSIBILITY OF COMPANIES

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

- a. Money laundering offense (Article 27 of Law No. 19,913)
- b. Terrorist financing offense, (Article 8 of Law No. 18.314) and
- c. Bribery crimes to national public officials and bribery to foreign public officials (articles 250 and 250 bis A of the Criminal Code)

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In consideration of the foregoing, the Company expressly prohibits any conduct that may give rise to the criminal imputation of the company under Law No. 20,393 for the acts committed by the Owners, Controllers, Directors, Managers and Executives.

Also, Principals, Representatives, those who carry out administration or supervision activities and any collaborator of the Company or external representative of the Company.

Likewise, natural persons that are under the direction and direct supervision of any of the aforementioned subjects and in general every worker of the Company are included.

SUSTAINABILITY.

Viña Valdivieso is committed to caring for the environment. Consequently, each executive and worker undertakes to carry out their operations and provide their services taking care to minimize, as far as is reasonable and possible, their impact on the environment and, in any case, always comply with the requirements of the current legislation in this regard.

All those who are part of the company must incorporate this concept in the execution of their daily tasks, as well as each contribute to the care of energy resources, avoiding the overconsumption of water, fuels, electricity and other sources of energy.

In the same way, people who become aware of any event or activity related to the Company, that has a polluting effect or that has a detrimental effect on the environment or imply a possible breach of the applicable regulation, will report this situation as soon as possible, to the competent administrative instances of the Company.

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

SOCIAL RESPONSIBILITY.

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

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



PROOF.

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

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

Name:

ID:

Position :

Date :

Signature :