



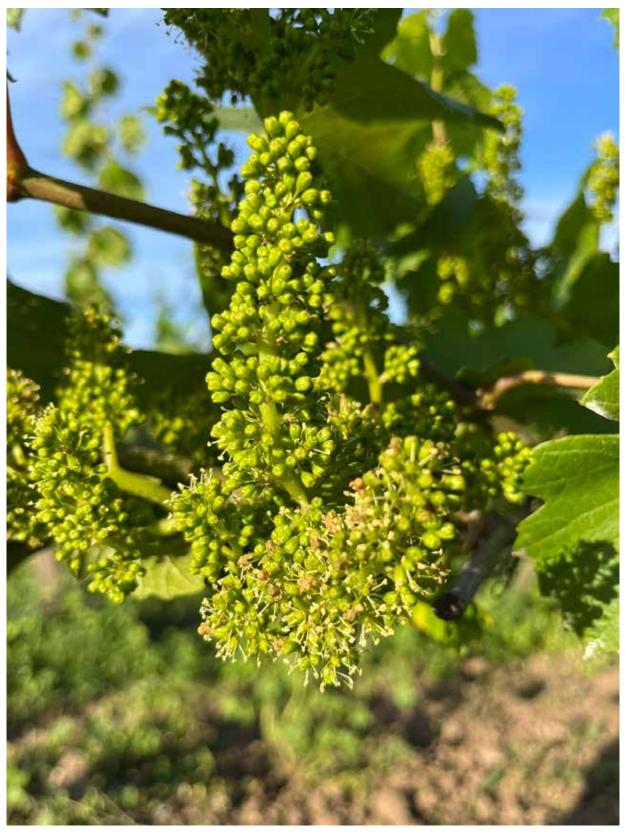
### CODE OF ETHICS

INTEGRATED MANAGEMENT SYSTEM



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Our vineyards blooming

## INTRODUCTION



Ricardo Court Juan-Oliver CEO

Casas del Toqui Winery has developed this Code of Ethics with the purpose of establishing and defining ethical values and guidelines of conduct for directors, managers and employees, and is also applicable to any other person or company that has a direct relationship with us.

Casas del Toqui Winery wants to communicate to all our interested parties its commitment to compliance with national standards and with those countries where we have commercial relations. Additionally, about the importance of respect, responsibility, honesty and sustainability in the development of our processes.

Our Code of Ethics is public, anyone who wishes can download it from our website www.casasdeltoqui.cl



## **OUR VALUES**

### BUSINESS ETHICS

For Casas del Toqui Winery, it is essential to work under ethical principles that align with the integrity of people while caring for the natural environment.

#### Fair Competition

Working under fair and loyal competition will always be the interest of Casas del Toqui Winery, that's why the duty of the company, directors, managers, administrative staff, agricultural and winery employees carry out their work in accordance with this principle, having the client's benefit as its main objective.

Predatory conducts such as competitive pricing, misleading advertising, infringement of consumer rights, etc. is strictly prohibited.

### ETHICAL PRACTICES WITH THE GOVERNMENT

The interest of this Code of Ethics is to establish a guide for the relations between employees of Casas del Toqui Winery and the government. Employees whose duties include contacting and carrying out procedures on behalf of the company with public entities must:

- Carry the company's ethical concepts into practice at all times.
- Be informed in detail of the regulations to which you will be subject by the authority before going to the offices of government employees.
- Relate with respect and seek good attention from government officials.
- Have a friendly approach and be willing to dialogue.
- Show control in the delivery of arguments and/or in the reception of communications from state workers, whether of any nature or scope.
- In case of any type of bribery and/ or dishonest actions by government employees, notify management immediately and then make a formal claim to the relevant entity.

#### Compliance with Laws

Our company will ensure correct compliance with the laws, regulations and other current standards that govern our field.

To ensure these practices, we have formalized the "Evaluation and Identification of Legal and Other Requirements" procedure, which aims to establish the methodology to identify, record and verify compliance with legal requirements and other regulatory requirements applicable to the operation of the company and to aspects related to Quality, Safety and Sustainability.

#### RELATIONSHIP WITH SUPPLIERS

The companies that will be in charge of supplying the inputs, materials and services required to process our operations will be carefully chosen, since the quality of these depends in part on the ability to fulfill the commitments made with our clients and finally on the competitiveness of the company in the market. Therefore, suppliers with a high level of commitment, professionalism, honesty and socially responsible will be privileged, also considering the needs of the company and carrying out technical and objective evaluations such as opportunity, price, quality, market

competition and existence of local offers. The selection procedures will always be transparent, based on the mentioned criteria and previously established.

If any violations of the provisions of this code of ethics are detected by our suppliers, the case will be analyzed and the corresponding actions will be taken, including canceling operations with said company.

#### **HUMAN RIGHTS**

#### Child Labour

For us, the rights of children must be fully fulfilled, which is why Casas del Toqui Winery does not hire minors. This is with the exception of students from technical-professional education centers, since this contributes to the students' learning and job training. When this happens we will request notarized authorization from their parents and we will ensure that the young people carry out functions that do not harm their integrity. This guideline is also applicable to companies under the subcontracting regime.

#### Forced Labour

At Casas del Toqui Winery we value and respect the personal dignity and rights of all those who work and relate to the company. The use of physical force or hostile and offensive behavior that may be interpreted as threats to the physical or moral integrity of a worker or a third party related to the organization is strictly prohibited.

We do not accept any form of forced labor or exploitation because we believe



Harvest

above all in respect for the dignity of the human being and we consider it unacceptable to keep any person under threat to carry out activities against their will.

#### Discrimination

Our company protects the rights of its workers, offering fair and equal working conditions. Likewise, no member of Casas del Toqui Winery should be discriminated against among other reasons due to their race, color, sex, sexual orientation, marital status, pregnancy, religion, nationality, ethnic and social origin, disability, age or political opinion.

#### Harassment

We promote that all our collaborators feel respected and valued, so no one of them should be subject to workplace harassment, such as being a victim of harassment, humiliating treatment, isolation from their environment, etc. We also categorically reject sexual harassment at work, so any type of inappropriate sexual conduct is prohibited. Sexual harassment understood to be when a person improperly makes, by any means, requests of a sexual nature, not consented to by the person receiving them and that threaten or harm their employment situation or employment opportunities.



Employees in the production plant

#### **OUALITY OF WORK LIFE**

Working Environment

For us it is very important to have a positive work environment within our company. For this and to evaluate the opinion that our workers have, we conduct an annual survey of all our collaborators, which measures topics related to the company, possibilities for creativity and initiative, co-workers, boss and superiors, job position, remuneration, recognition and communication. Based on the results obtained, action plans are made in order to continually improve in different aspects.

#### Equal Opportunities

We provide the opportunity for employees to be promoted to a position of greater responsibility and remuneration, within an objective and evaluative framework of capabilities and performance.

We will take care to maintain established position profiles and salaries, always seeking to make equitable payments for work of equal value.

### PARTICIPATION OF THE EMPLOYEES

We consider that our main asset is our collaborators, so it is essential to involve them and incorporate their suggestions, ideas, opinions, disclaimers, etc., in order to improve the management of the company and for the benefit of all of us who are part of it.

To facilitate the participation of employees, we have communication channels enabled in the Winery, Vineyards and central offices, such as suggestion boxes, intranet, web system, forms, 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 discuss mutual beneficial issues related to management, as well as incentives, achievement of results, goals and work environment.

#### FREEDOM OF ASSOCIATION

For us, freedom of expression is fundamental, for this reason our collaborators have the right to freely form a workers' association, as a company we maintain a neutral position, not preventing workers from organizing. There is no discrimination or retaliation against those who wish to join or disaffiliate. As the only condition, we only ask that you act and adhere to what the law indicates and their statutes.

#### LABOR LEGISLATION

When requiring the incorporation of new hired or subcontracted personnel, Casas del Toqui Winery complies with current labor legislation applicable to its productive activity.

In virtue of this, all our collaborators:

- Have their employment contract, receiving the corresponding remuneration.
- The corresponding legal discounts are made and paid.
- The working hours are respected and when these are exceeded, payments are made for overtime generated.

• They will have the same working and training conditions offered to the company's workers, without making differences or discrimination towards subcontracted personnel.

We will ensure that the selected contractor company complies with current labor laws applicable to the activity and with the provisions of the Regulation for Contractor Companies and Subcontractors, which establishes, among other requirements and obligations, the risk prevention requirements to be met during the execution of the works. activities and/or services subcontracted by the company.

#### Termination of the Labor Relationship

When disengaging any employee from Casas del Toqui Winery, all assets must be returned, this includes documents and in general any media that contains company information. Use and disclosure of such information is prohibited unless it is in the public domain.

#### OCCUPATIONAL HEALTH AND SAFETY

Our employees are an important part of the company's operation, which is why we constantly evaluate and prevent any risk that affects their life and health.

To do this, we have the support of a Risk Prevention advisor, and are periodically supported by institutions that administer work accident insurance in compliance with Law No. 16,744.

In addition, the company provides its collaborators with all personal protection and safety implements and equipment according to each task carried out, in order to avoid accidents and effects that may be harmful to the health of plant workers, contractors and subcontractors.

In the same way, the company promotes compliance with the order, hygiene and safety regulations among its workers.

#### **HEALTHY LIFE**

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

#### ALCOHOL AND DRUG ABUSE

Aware that we are a company that supplies alcoholic beverages, we are very committed to raising awareness among our employees and their families about the risks of abuse and inappropriate use of wine.

As a company we also strongly reject the use of drugs or illicit substances in the workplace, which is why we carry out training on the prevention and support of drug use.

#### COMMUNITY

For Casas del Toqui Winery it is important to maintain and continue implementing good working conditions for its entire working community. Furthermore, given the place where its industrial activity is focused, it creates the ideal scenario for the economic and social development of the Totihue community.

Beyond compliance with current applicable laws and regulations, Casas del Toqui Winery identifies its communities where it has influence, evaluates the impacts produced on it due to its productive activities, creating an action plan to minimize or enhance the negative or positive effects respectively.

We are a company open to the community, and, according to our possibilities, we provide our facilities or make arrangements for the use of third-party facilities, which allow the development of activities that help the community.

As part of our effort to cooperate in the development of the community close to the company, we favor the hiring of suppliers and services offered by the nearby community, as long as they are available and meet the requirements sought by the company.

#### MARKETING

We support our communication policies and marketing campaigns with our values and ethical principles, communicating internally and externally, in a transparent and truthful manner, our actions in any area. We use truthful content in our marketing campaigns, without misleading or inciting inappropriate behavior.

We respect fair competition, without plagiarizing concepts used by other competitors in the market or incorporating aggressive messages against them.

We reject any propaganda or advertising campaign that uses people, especially children, adolescents or minorities in immoral, risky or harmful situations, as well as campaigns that denigrate or belittle people or groups, especially for racial, political, ethnic, religious or cultural reasons, their sex or sexual orientation.

#### Relationship with Customers

Having a relationship with clients based on respect, honesty, trust and that lasts over time is the main interest of Casas del Toqui Winery. By virtue of this, we work hard to provide the best service to our clients.

The company will transmit this Code of Ethics and Conduct to all its clients and will encourage them to adopt the practices they consider relevant to their operations.



If any breach of ethical standards is detected on the part of its clients, an analysis of the case will be carried out and, if it is considered pertinent, attention to it will be cancelled. Special attention will be paid to sales that are made through ethically questionable means.

#### ETHICAL SELLING

Casas del Toqui Winery will not make sales using unethical practices, nor pressure actions such as deception, undue influence, extra payments or others and will marginalize any client who uses this type of practices, demonstrating free competition.

We handle our clients' information

respectfully, without compromising their privacy. Therefore, the information of our clients, to which we have access, will always be confidential.

We implement safeguards to fulfill this purpose, such as staff training, information access codes, among others.

#### **CONFLICTS OF INTEREST**

Commercial decisions must always be based on objective reasons and criteria, so all Casas del Toqui Winery employees must be aware that, in the face of a conflict of interest, which occurs when personal interests, family members or related people, are greater or differ from the interests of Casas del Toqui Winery. Some common conflicts that we should recognize and avoid include:

- Have a personal or work relationship with a supplier company, client, competitor or subcontractor.
- Have an investment or interest in any supplier company, customer, competitor, subcontractor or other company.
- Personal or family relationships that overlap with your professional life, for example, when you have a family member who works for a competitor of the Vineyard or become a Vineyard manager with direct supervision over a close friend.

Likewise, business conduct and decisions are based on the interests of the organization and its benefit.



Our vineyards

#### **ENVIRONMENT**

The production of grapes and wine at Casas del Toqui Winery has been the driving force of this family business. That is why we have learned to work taking care of the natural environment, seeking the effective and responsible use of natural resources, as well as correctly managing the waste generated in the production process. We diagnose the main positive and negative impacts that our activities cause on the environment, and we implement controls to mitigate negative impacts.

### ETHICS AND COMPLAINTS COMMITTEE

To manage this document, an Ethics Committee will be established, which will be responsible for the following actions:

• Be a promoter of the company's ethical concepts and standards.

- Respond to staff queries and analyze reported cases.
- Investigate and document cases.
- Generate sanctions.
- · Maintain statistics and reports.

The Ethics Committee will be made up of representatives from different areas of the Company who are recognized for their exemplary behavior, and will be appointed by the Board of Directors or by the Vineyard Management.

This Committee will be composed of:

- · General manager
- COO
- Head of Quality and Sustainability

If required, the Committee may invite specific Area Heads or Management to its meetings, when it needs to better investigate a complaint situation. Finally, if there is no agreement regarding the type of sanction to be applied, the background of the case will be submitted to the Presidency, who will be able to decide and indicate the action to be taken.

Any breach of the Code of Ethics detected by any employee of Casas del Toqui Winery

Managers and Area Heads are responsible for selecting and negotiating with suppliers on behalf of the company, providing equal opportunities to current and potential suppliers, as established in the company's purchasing procedure.

According to the policies and marketing strategies of Casas del Toqui Winery, corporate gifts can be delivered to its clients and suppliers on its behalf. These must adequately represent the corporate image of Casas del Toqui Winery and their destination must correspond exclusively to clients or suppliers.

Gifts, benefits and invitations to third parties, that can be interpreted as bribes, incentives, illicit benefits that violate business ethics, must be communicated and act in accordance with the provisions of our Code of Ethics and Conduct.



must be reported to their direct boss or to the Human Resources office. Any of them who receives this information must inform the Ethics Committee to analyze the case and determine the sanctions. respective if applicable.

The identity of any employee who reports a violation of this code will be kept confidential, if expressly required or requested. Finally, we encourage all employees to raise issues and seek guidance on ethical issues, as well as safety, quality and the environment.

In those cases in which unethical attitudes are demonstrated, sanctions will be applied, ranging from verbal reprimands to dismissal of the employee and/or supplier.

#### VALIDITY

The updated and controlled version of the Code of Ethics will be exclusively the one available on the Casas del Toqui Winery website. This document is public and can be downloaded and printed by anyone who requires it.