



# Code of Business Conduct and Ethics

Viña Concha y Toro S.A. and Subsidiaries

# Code of Business Conduct and Ethics

## Viña Concha y Toro S.A. and Subsidiaries

Viña Concha y Toro S.A. (hereinafter “Viña Concha y Toro”, and together with its subsidiaries, the “Company”), has defined as one of its essential aims for the development of the Company’s activities, that in each stage of the products’ preparation, distribution and sale, every one of the directors, executives and personnel comply with the current rules and regulations of the jurisdiction where they operate. Viña Concha y Toro also requires its directors, executives and personnel to know and commit to the maximum with the Company’s ethical values and integrity in pursuit of excellence and transparency.

In this Code of Business Conduct and Ethics, the Company has summarized the ethical principles and values and minimum conduct in which the actions of the directors, executives and personnel of Viña Concha y Toro and its subsidiary companies, without exception, should be performed.

For the purposes of this Code of Business Conduct and Ethics, the “Subsidiaries” of Viña Concha y Toro are understood to be any company or entity controlled, directly or indirectly, by Viña Concha y Toro.

# 1 THE PERSONNEL OF VIÑA CONCHA Y TORO AND ITS SUBSIDIARIES

The success and development of Viña Concha y Toro in Chile and in the world are essentially due to the professional and human high quality of its people, and the climate of personal respect promoted in the Company. Maintaining this quality and climate is, for the Company, an essential objective for its future actions and development.

## 1.1 Scope of Application

This Code of Business Conduct and Ethics applies to all the operations of Viña Concha y Toro and its Subsidiaries. It also includes all the directors, executives and personnel of Viña Concha y Toro and its Subsidiaries who are expected to take good note of its contents and comply with its requirements.

This Code of Business Conduct and Ethics was not conceived to cover all possible situations, nor is a compendium of all the laws, regulations and policies that might affect the Company. Therefore, by no way it should be understood that this Code replaces or reforms other internal policies and/or procedures; on the contrary it is complemented and/or integrated with them.

## 1.2 Duties of Senior Management and the personnel in general.

### Senior Management:

The senior management of Viña Concha y Toro, including the Chief Executive Officer and other managers, both corporate and of the Subsidiaries, is responsible for:

- a. Conducting their management activities with the maximum of honesty, integrity and ethics.
- b. Complying and ensuring compliance with the applicable laws and regulations in each jurisdiction where it operates.
- c. Guaranteeing that all information contained in reports and documents presented by the Company and all public communications made by the Company are complete, impartial, exact, timely and comprehensive.
- d. Handling all conflicts of interest, whether real or presumed, complying with the procedure established in Section 2.3.
- e. Guaranteeing that the people subject to the application of this Code understand and apply the regulations contained in this Code of Business Conduct and Ethics.
- f. Establishing policies and procedures that ensure that persons subject to the application of this Code are duly trained and carry out their responsibilities in accordance with the policies and regulatory obligations of Viña Concha y Toro.
- g. Setting performance objectives and expectations that are reasonable and that can be achieved without compromising or ceasing to apply the policies and regulatory obligations of Viña Concha y Toro.
- h. Taking timely and suitable measures when informed of breaches, whether real or presumed, of the law or the policies of Viña Concha y Toro.
- i. Guaranteeing the prohibition of acts of vengeance against any person who in good faith informs or makes the Company or any of its executives aware of any breach or possible non-compliance with the law or the policies of Viña Concha y Toro.

## Personnel, in general:

The personnel of Viña Concha y Toro and Subsidiaries, regardless of their hierarchy or position, are responsible for:

- a. Understanding and acting in accordance with the regulations described in this Code and with the policies and procedures applicable in their area of work.
- b. Complying with the laws, rules and regulations applicable to their activity.
- c. Respecting the dignity of people with whom they have to relate, whether workers, contractors, sub-contractors, suppliers, authorities or customers.
- d. Informing their immediate superior, or any pertinent employees, of any non-compliance or possible non-compliance with the law or the policies of Viña Concha y Toro, including any violation of this Code, and providing promptly all the cooperation required with audit procedures to determinate compliance with the regulations applicable to Viña Concha y Toro and/or its Subsidiaries, as well as its policies.

### 1.3 Generic Principles.

During their activities, the directors, executives and personnel of Viña Concha y Toro and its Subsidiaries shall maintain an irreproachable ethical behavior. This obligation applies to the private lives of the directors, executives and personnel of Viña Concha y Toro and its Subsidiaries, when these affect the prestige or reputation of the Company, or compromises compliance with this Code.

Daily working activities should be carried out with loyalty toward the Company, defending its interests, image and corporate integrity, complying with the applicable laws and regulations, and providing reliable and true information every time this is required by the applicable regulation.

-In compliance with their obligations and responsibilities with the Company, customers, producers, suppliers and authorities-, the directors, executives and personnel of Viña Concha y Toro and its Subsidiaries shall act with honesty, responsibility, diligence, professionalism, objectivity and proactively.

The executives and personnel of Viña Concha y Toro and its Subsidiaries shall treat the level of satisfaction of every customer of the Company as their own.

Reaching excellence in the quality of the products and services must be the result of the daily efforts of each and every one of the executives and personnel of Viña Concha y Toro and its Subsidiaries.

Every one of the executives and personnel of Viña Concha y Toro and its Subsidiaries should fully assume the requirements of being positive leaders of their work teams and, as such, should accept the personal and professional responsibilities this implies.

The directors, executives and personnel of Viña Concha y Toro and its Subsidiaries shall not use, directly or indirectly, for their own benefit or the benefit of third parties other than the Company, the resources under their charge in the development of their activities or as a result of their jobs.

As a general rule of the Company, it is forbidden for the directors, executives and personnel of the Company to offer or give gifts to public and/or private officials, nor receive these from such persons, when such gifts might reasonably be perceived as incentive, when such action represents a breaking of the laws, regulations and policies of the Company, or when such action might embarrass or negatively affect its image and reputation. The Company has businesses in the United States of America, and is subject to the norms and regulations of the Foreign Corrupt Practices Act (FCPA), that prohibits to make corrupt payments to foreign personnel with the objective of obtaining or retaining business. Viña Concha y Toro's operations and activities, and those of its Subsidiaries are subject to FCPA anywhere in the world.

The decisions taken by the directors, executives and personnel of Viña Concha y Toro and its Subsidiaries should always be based on an analysis of the circumstances and the consequences that might result for the Company, giving priority to the success of the Company over their personal interests.

Employees of Viña Concha y Toro and its Subsidiaries work on behalf of Viña Concha y Toro and its Subsidiaries exclusively in those situations for which they have been granted power or authorization, whether by the nature of their job or by express delegation. They should therefore refrain from acting in the name of Viña Concha y Toro and its Subsidiaries when they have not been authorized to do so.

Corporate gifts may be made to customers and suppliers in accordance with the policies and marketing strategies of Viña Concha y Toro S.A., and Subsidiaries on their behalf. These shall represent suitably the corporate image of Viña Concha y Toro and they should be exclusively used for the customers or suppliers.

Care should be exercised in making invitations to dinners or events concerning business matters in order that these do not imply or may be understood to be a commitment, undue influence or, due to their character, nature or frequency, may be interpreted as a deliberate intent to affect the independence, impartiality or judgment of third parties.

In the event of being invited to a dinner, event or journey, care should be taken to ensure that this could not be interpreted as affecting the independence of the person of Viña Concha y Toro and its Subsidiaries.

Viña Concha y Toro and its Subsidiaries declare that they are opposed to influence the will of people outside the Company to obtain some benefit through the use of unethical practices, nor they will allow other people or entities to make use of these practices against its employees.

The Ethics Committee should be consulted in case of doubt concerning these matters.

## 1.4 Labor relations

There shall not be arbitrary discrimination of any kind in the workplace. Every employee shall enjoy equality of opportunities and treatments regardless of their ethnic origin, religion, nationality, color, marriage status, age, political opinions, gender, physical impediment or others.

Are particularly reprehensible and rejected by the Company the sexual or labor harassments, the behaviors related to child labor or that implies situations of forced or obligatory labor. Every Company employee who considers itself to be a victim of such conduct, or witnesses it, has the right to proceed according to the denouncement procedures contained in this Code, in the labor law and in the respective Company's Internal Regulations for Order, Hygiene and Safety.

Every employee, with the sole exception of the applicable legal restrictions, has the right to freely organize trade unions or associations of workers and join or leave them, with the sole condition of respecting the law and their bylaws. This Code shall consider as reprehensible those actions that go against the employee's freedom to affiliate or unionize.

Where there is no trade union, the Company shall adopt a neutral position and shall not prevent workers from organizing trade unions, by not discriminating either in favor or against such affiliation.

The Company recognizes the right of the personnel, with the exception of the applicable legal restrictions, to decide whether they wish their working conditions to be established within a collective bargaining process or an individual negotiation of the work contract, in accordance with the pertinent rules contained in the Labor Code. This Code shall consider as reprehensible those actions that act against the liberty of negotiating collectively or joining together in negotiating groups for these purposes, in accordance with the applicable law.

The Company, its executives and personnel shall comply with diligence, accuracy and good faith with the obligations deriving from the individual and collective labor contracts, with the regulations that establish social benefits for the personnel, and with the Internal Regulations for Order, Hygiene and Safety, and applicable labor and social-security legislation.

## 1.5 Working environment and conditions

The Company intends to offer its personnel a safe working environment, without risks that could threaten their safety, physical or psychological integrity, and health, providing when necessary protective clothing and suitable equipment to prevent potential risks of accidents or prejudicial health effects. As for the personnel, they commit to support the work-safety programs developed by the Company, adopting and ensuring the adoption of all the necessary measures for safe work, and to use appropriately the safety elements provided for their personal protection by the Company.

In their dealings with the personnel, managers and supervisors shall always maintain an attitude that favors the development of a constructive working environment, including the habitual rules of social comradeship, avoiding any discriminatory behavior or disrespect toward other workers or toward union organizations or associations that legitimately represent them.

Respect is due to the privacy and dignity of the employees, only holding the personal data that is needed for the good functioning of the Company.

## 1.6 Use of assets and information

The Company's goods, installations and financial resources shall be used only for complying with its mission. The principles of efficiency, rationality and savings shall be adopted.

All the information to which employees have access in carrying out their tasks shall always be of a confidential nature and may only be used for purposes related to work within the Company. The use or delivery of information to unauthorized third parties is forbidden, as well as the use of that information for its own benefit or the benefit of others, in a way contrary to that established in law or prejudicial to the interests of the Company or its customers or suppliers.

It is the Company's policy that the Company together with both its Subsidiaries and personnel comply with the laws and internal policies relating to the precision and integrity of the financial accounting books and their updating. The accounting and legal books of Viña Concha y Toro and its Subsidiaries, plus the operative records and any other information, should be reliable and meet internal policies and procedures. Transactions between the Company and its Subsidiaries or with third parties shall be promptly and duly recorded in our accounting books in accordance with current accounting and legal principles, regulations and practices. It is absolutely forbidden, under any circumstance, to falsify information and/or provide inexact or incorrect information.

## 2 CUSTOMERS, GRAPE AND WINE PRODUCERS AND OTHER SUPPLIERS

### 2.1 Customer relations

Satisfaction of our customers is one of the principles that guide the Company's actions and those of its suppliers, therefore all the acts of its directors, executives and personnel should tend to meet their needs.

Our customers' needs should be understood, attended and satisfied, offering products and services of the highest quality, under competitive conditions. As well, responses to their requests and possible complaints should always be promptly and efficiently resolved by the executives and personnel of Viña Concha y Toro and its Subsidiaries. The sale of the Company's products and services should be made honestly, avoiding all kinds of collusion and the use of misleading strategies or fraud. Undue advantages should never be attempted over our customers in order to secure temporary gains. The relationship with our customers should be focused on generating long-term relations based on mutual knowledge and trust.

The executives and personnel of Viña Concha y Toro and its Subsidiaries shall comply and ensure compliance with diligence and good faith with the different contracts signed by the Company with its customers, grapes or wine producers and other suppliers.

The information exchange about customers shall be acceptable only and exclusively when it is reasonably known that it is being received and used within the bounds permitted by the applicable legislation and policies of the Company.

## 2.2. Relations with other producers or wine distributors and other industry competitors

The Company, its directors, executives and personnel shall promote and base their actions on principles of respect for free and fair competition and for other players in the market, regardless of their size or market position. The Company's personnel, in pursuing profits and benefits for it, shall always bear these principles in mind and the final benefit of the customer.

For the purposes of this Code, the following practices are among those considered as against free competition, constituting a gross misconduct under this Code of Business Conduct and Ethics:

- a) Attracting potential customers or keeping current ones by granting benefits not compatible with healthy practices and good market customs;
- b) Offering products, services or combinations of both at prices or rates lower than the costs of such products or services, in order to obtain business to the detriment of a competitor;
- c) Displaying publicity whose content or format does not reflect the instructions given under consumer-protection laws, the instructions of the National Consumer Service and any other regulations applicable to this matter;
- d) Colluding or operating together with other market players in order to restrict the supply or to artificially increase prices, to the detriment of customers and other competitors;
- e) Abusing a dominant position in order to obtain more favorable conditions than those that could be obtained in a fair market intervention, and
- f) Going against free competition regulations in any way

## 2.3 Relations with grape and wine producers and other suppliers

All the equipment, raw materials, materials, supplies, services and similar should be acquired on their own merits.

Grape and wine producers, suppliers, sellers, contractors and sub-contractors of Viña Concha y Toro and its Subsidiaries shall receive from the Company a fair and equitable treatment, without arbitrary discrimination, complying at all times with the contracts and commitments assumed and with applicable legislation.

Financial settlements, reports, controls and invoicing shall reflect correctly and faithfully the transactions with producers and suppliers and compliance with the Company's commitments with them.

The selection and contracting of suppliers shall always be based on technical, professional and ethical criteria and on the needs of the Company, selecting their proposals by objective factors like competence, promptness, price and quality. Selection procedures shall be transparent, established prior to selection and demonstrable to the higher authorities of Viña Concha y Toro and its Subsidiaries. Negotiations should be avoided with companies or persons about which there is some reasonable doubt as for their honesty or ethical principles.

## 2.4 Conflicts of interest

In case of conflicts of interest, whether real or presumed, in dealings with producers, suppliers, customers and other people having business relations with the Company, the directors, executives and personnel affected shall declare them expressly, promptly and transparently so that the Company will be able to make the corresponding decisions as established in the respective regulations.

Conflicts of interest can arise when the Company's directors, executives and/or personnel who occupy positions with discretionary powers, just as their spouses or relations to second-degree relatives, have a significant investment or a director's or management position in that other party with which Viña Concha y Toro and its Subsidiaries have commercial relations.

For these purposes, a conflict of interest can be understood as the incompatibility produced in any act or negotiation between Viña Concha y Toro and/or one of its Subsidiaries and a related party, when there are business relations, kinship or affective relations between whoever evaluates, carries out or decides on such act and/or participates in the management, supervision or control of the processes deriving from it, and the related party, and such relationship leads to presume a lack of independence or impartiality in decision-making, all of which strengthens the possibility of benefiting directly or indirectly the related person and/or employees of the Company participating in decision-making. Similarly, conflict of interest shall be understood as the one defined or established as such in the applicable legislation. In all these aspects, the provisions of current legislation shall be respected.

The people involved in conflicts of interest, whether real or presumed, shall consider the following principles:

- » **Independence:** They shall act at all times with loyalty to the Company and its shareholders, regardless of their personal or third-party benefit.
- » **Information:** They shall report immediately the knowledge of the conflict of interest to the executive or immediate superior, or to the authority the law determines, about the existence of the conflict of interest and the circumstances motivating it.
- » **Abstention:** The directors, executives and personnel shall refrain from taking part or influencing the decisions-making that might affect persons or entities with which there is a conflict. They shall especially comply fully with that established in relation to this matter in current legislation.
- » **Confidentiality:** Any person in a situation of conflict of interest shall refrain from accessing information classified as confidential which is related to this conflict.

## 3 THE ENVIRONMENT AND SOCIETY

The Company is committed to care for the environment. Every executive and employee therefore is committed to carry out their operations and provide their services, taking care to minimize, as far as is reasonably possible, their impact on the environment and in every case complying with the requirements of the respective current legislation.

Similarly, persons subject to this Code who are aware of any event or activity related to the Company that has a contaminating effect or has a prejudicial effect on the environment or implies a potential breach of applicable regulations, shall report this situation as soon as possible to the Company's competent management authorities.

When legally advisable, or it is believed necessary or correct, the Company shall report this situation to the shareholders, the regulatory bodies and the public in general, in a complete and true manner, in this way complying with that established by law in this matter.

## 4 FINANCIAL ASPECTS AND SECURITIES MARKET

### 4.1 Privileged Information

As foreseen in the applicable legislation, any information referring to Viña Concha y Toro, its businesses or to one or various securities issued by the Company, that has not been divulged to the market and whose knowledge is by its nature capable of influencing the quotation of the securities issued, has to be considered as "privileged information".

In order to protect the transparency that should prevail in the market, it is the Company's policy that the privileged information (as defined in the preceding paragraph) held in exercising functions in the Company, should not be used, directly or indirectly, for own benefit, nor be divulged to third parties or used to induce third parties to trade Company's securities whose price may be influenced by such information, in accordance with that established in applicable law and regulations.

For these purposes, persons who have, due to their job, position, activity or relationship with the Company, some kind of privileged information are forbidden and shall refrain from carrying out on its own behalf or on behalf of a third party, directly or indirectly, any of the following activities:

- Preparing or carrying out any kind of operation as regards the securities affected that the information refers to.
- Spreading or communicating such information to third parties unless indispensable and necessary within the normal course of their work, job or profession.

- Recommending or advising a third party to acquire or sell negotiable or financial instruments of the Company based on such information.
- Performing any other activity with respect to such information that is expressly forbidden under applicable legislation.

## 4.2 Incompatibility

In order to protect independence of opinion, the Company's leading executives may not have been executives or employees of the external auditing firm contracted to perform the audit of the financial statements of Viña Concha y Toro and/or its Subsidiaries, at least during the year prior to the start of the new financial statements' revision.

## 4.3 Comuncacions and Certifications

During the study and negotiation phase of any legal or financial operation that might appreciably influence the quotation of the affected securities or instruments, the executives responsible shall consider:

- Keeping a documental record of every confidential operation, which includes the names of the people taking part in these transactions.
- Expressly warning the people taking part in the confidential operation of the confidential nature of the information and the prohibition on its use as regards such transaction. Similarly, the disclosure of the information shall be limited strictly to those persons internal or external to the organization who need to have access; security measure shall be taken for the custody, filing, access, reproduction and distribution of such information.

Investors, the market, government bodies, other authorized institutions and the public in general shall be provided with true, clear, just, exact, complete, comprehensible and timely information, acting in accordance with applicable laws, rules and regulations.

The General Manager and the Manager Administration and Finance of Viña Concha y Toro shall certify, with respect to each annual report of the financial statements that (i) they have read the report which is faithful, reflects the Company's position and contains no omissions of material information, to the best of their knowledge, (ii) they are responsible for establishing and maintaining internal controls and they certify the communication of the financial information, as they have evaluated the effectiveness of such controls from the date of the previous annual report and as the conclusions are included in the report of the financial statements as regards such effectiveness, (iii) they have disclosed to both the external auditors and to the Directors' Committee all the significant deficiencies in the design or operation of the internal controls that may affect the ability to file, process, summarize and report financial data; any fraud, material or not, that involves executives or personnel that would affect the internal controls, and whether there are significant changes in the internal controls as indicated in the report. The same rules apply to the Subsidiaries of Viña Concha y Toro.

## 5 RESPONSIBILITY OF THE EMPLOYEES

All employees of Viña Concha y Toro and its Subsidiaries have the obligation to comply and ensure compliance with this Code of Business Conduct and Ethics, the policies regulating it, the individual and collective labor contracts affecting them, the Company's internal rules and regulations, the fundamental agreements of the ILO and current labor legislation.

Non-compliance with the terms of this Code shall be considered, when legally appropriate, as a labor infringement and a breach of their obligations toward the Company, regardless of any decision taken by the Courts of Justice and notwithstanding the civil or penal liability under current laws as a result of such breach.

There shall be no complacency about incorrect conduct with respect to this Code. All employees are obliged to report to their supervisors, heads or the general management, the real or presumed violations of the provisions of this Code of which they are aware.

The Company will support any employee who denounces any of these negligent activities seriously and responsibly. Any kind of internal administrative reprisal is forbidden against such employees.

## 6 EFFECTIVENESS AND INTERPRETATION

This Code shall come into effect once published on the Company's web site, which shall be within thirty days of its approval by the Board. A copy of it or an abstract will be handed to every employee and shall be presumed to be known once it is received and thus its compliance may be demanded of the employees of Viña Concha y Toro and its Subsidiaries.

Notwithstanding, the Company shall hand and/or make available to each director, executive and employee a copy of the Code of Business Conduct and Ethics at the time of their contracting.

Any consultation or doubt about the interpretation or scope of this Code of Ethics and Conduct should be addressed to the Company's Legal Counsel who, together with the General Management, shall be responsible for determining the sense and scope of the provisions contained in it. The Legal Counsel, with the agreement of the General Management, shall also be responsible for evaluating any eventual regulatory change that requires amendments to this Code and propose to the Board the amendments to its text.

### Personal responsibility of the employees and their hierarchical superiors

In the terms established in the previous paragraphs, the employees shall respond personally and officially for their behavior and eventual violations of this Code of Business Conduct and Ethics. This notwithstanding the responsibilities that might apply to their hierarchical superiors who have been aware, or with a minimum of diligence could have known, of the behavior of the employees under their responsibility.

## 7 CRIMINAL LIABILITY OF THE COMPANY

In accordance with Law 20.393, which establishes the criminal liability of legal entities for the crimes of asset laundering, the financing of terrorism and the bribery of national or foreign public officials, the Company may be responsible for the committing of the crimes stated in that law by the personnel and dependents within the ambit of their functions.

The Company therefore expressly forbids any conduct that might lead to the criminal charge of the Company under Law 20.393 for acts committed by the owners, controllers, directors, responsible persons, leading executives and representatives who perform management or supervisory activities and any employee of the Company or external on behalf of the Company.

Also included are individuals under the direction and direct supervision of any of the persons mentioned above and in general any employee of the Company.

In other words, the values and principles published by the Company are aligned as detailed in the policy and Crime Prevention Model of Viña Concha y Toro S.A. and Subsidiaries, in order to avoid any activity that goes against the values and principles provided by the Company.

## 8 CRIMINAL LIABILITY OF THE COMPANY

The personnel of Viña Concha y Toro S.A. and Subsidiaries and the external workers, including the contractors, suppliers, advisers, agents, etc., are expressly forbidden from carrying out any act that might constitute the following crimes of:

- **Assets Laundering:**

As established in article 27 of Law 19.913, “any act tending to hide or dissimulate the illicit origin of certain assets, knowing that they come from the perpetration of crimes related to the trafficking of drugs, terrorism, arms trafficking, the promotion of child prostitution, kidnapping, bribery and others”.

- **Financing of Terrorism:**

As established in article 8 of Law 18.314, “individuals or legal entities who by any means request, collect or provide funds whose purpose is to commit any terrorist crime, like taking over or attacking a public means of conveyance in service, attacking the head of State and other officials, illicit association in order to commit terrorist crimes, etc”.

- **Bribery of a national public official:**

As established in article 250 of the Penal Code, “the offering or consenting to give to a public official an economic or other kind of benefit, to take advantage of the official or third party”, for:

- Carrying out acts related to their position for which they have no rights.
- Having omitted a due act of their position.
- Having carried out an act in infringement of the duties of their position

- **Bribery of a foreign public official:**

As established in article 250 of the Penal Code, “the offering, promising or giving to a foreign public official an economic or other kind of benefit, to take advantage of the official or third party”, for:

- Performing an action or incurring in an omission with the object of obtaining or maintaining any business or undue advantage in the area of any international transaction.

## 9 ETHICS COMMITTEE

The Ethics Committee is responsible for ensuring the due diffusion and application of this Ethics Code, which means that it shall:

- Promote the values and conducts developed in the Code of Business Conduct and Ethics.
- Facilitate and assist the Crime Prevention Officer in the development, implementation and effective operation of the Crime Prevention Model.
- Be a consultative organ.
- Facilitate the resolution of conflicts related to the application of the Code of Business Conduct and Ethics, mediating between the parties.
- Know and resolve complaints as indicated in this Code, respecting the rights of the workers or employees, especially the right to be heard and defend themselves, and that resolutions dictated against them are duly founded.
- Direct special cases to the appropriate authority.
- Propose updates and modifications to the Code of Business Conduct and Ethics.
- Revise the requests for clarification of specific situations of personnel of Viña Concha y Toro S.A. and Subsidiaries.
- Issue the necessary circulars and instructions for the development and compliance with the provisions of the Code of Business Conduct and Ethics.

The Board of Viña Concha y Toro S.A. and Subsidiaries shall appoint the persons to be members of the Ethics Committee, which appointments shall be announced to all the personnel of Viña Concha y Toro S.A. and Subsidiaries.

Every employee may, through any of the members of the Ethics Committee, via electronic mail, letter or personally, consult or provide information with regard to the non-compliance with this Code, which in all cases shall be treated with absolute confidentiality and reserve.

Every employee of Viña Concha y Toro S.A. and Subsidiaries shall agree to know this Code of Business Conduct and Ethics by signing the Ethics and Conduct Code Letter of Commitment.

## CODE OF ETHICS AND CONDUCT LETTER OF COMMITMENT

"I confirm that I have read the Ethics Code of Viña Concha y Toro S.A. and Subsidiaries and that I understand the importance and context of the rules set out herein. I understand that its compliance is obligatory for all the personnel of Viña Concha y Toro S.A. and Subsidiaries and that by complying with the Ethics Code I am contributing to create a better working environment in which we can feel proud and grow up as persons and professionals.

I state that I am complying with the standards of conduct established herein and in any event, in the case of any doubt, I promise to consult the Ethics Committee with respect to the interpretation and application of the rules and policies set out in this Code."

Place and date: \_\_\_\_\_

Signature: \_\_\_\_\_

Complete name: \_\_\_\_\_