Crime Prevention Manual

Viña Concha y Toro and its subsidiaries.

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VIÑA CONCHA Y TORO
— FAMILY OF NEW WORLD WINERIES —

1. Aim

The Board of Directors of Viña Concha y Toro S.A. recognizes that one of the Company's primary missions is for its directors, executives, and employees to act with integrity and ethics. To support this, the current Crime Prevention Manual has been developed in accordance with Law No. 20.393.

The above outlines the core principles and values of the Company, as stated in the Code of Ethics and Conduct of Viña Concha y Toro S.A. and its subsidiaries, both domestic and international. Therefore, the Company emphasizes the correct application and diligent monitoring of these principles.

Our culture of integrity and conduct based on excellence, respect, and collaboration requires everyone at the Company to follow the guidelines for preventing crimes outlined in Chilean Law 20.393. This law relates to the criminal responsibility of legal entities and is based on implementing the Crime Prevention Model (CPM), with ongoing evaluation for continuous improvement. Therefore, through this manual, the Company aims to provide the necessary tools and guidelines to prevent actions that could harm corporate integrity or lead to criminal liability for Viña Concha y Toro S.A. and its domestic and foreign operations subsidiaries.

Specifically, this Manual aims to achieve the following objectives:

- ➔ Prevent crimes within the organization.
- ➔ Foster a culture of ethics and compliance.
- ➔ Establish effective mechanisms to detect and respond ti potencial crimes.
- ➔ Comply with applicable laws and regulations, including Law No. 20,393 on the Criminal Responsibility of Legal Entities and Law No. 21,595 on Economic Crimes.

2. Scope

This Manual is mandatory for Viña Concha y Toro S.A., its domestic and international subsidiaries, its stakeholders, and for:

Third Parties or Advisors: Any individual or legal entity that provides any type of professional service, support, and/or commercial relationship with the Company under public or private law.
Crimes refer to those outlined in Article One of Law 20.393, which are defined and classified in Annex I of this document.

→ The Company's employees;
→ The Company's Suppliers, service providers, contractors, and subcontractors;

→ Top management, which comprises the key executives, directors, external advisors, and individuals responsible for management and oversight activities within the Companies.

3. Related Documents

→ Code of Ethics and Conduct
→ Policy on Interactions with Public Officials and Auditors
→ Corporate Gifts and Invitations Policy
→ Conflicts of Interest Policy

4. Definitiones

Third Parties or Advisors: Any individual or legal entity that provides any type of professional service, support, and/or commercial relationship with the Company under public or private law.

Crimes refer to those outlined in Article One of Law 20.393, which are defined and classified in Annex I of this document.

Principal Responsible Subject (PRS): The individual accountable for implementing, monitoring, and controlling the proper functioning of the Company's CPM to identify and correct potential deficiencies and to update it according to changes in the Company's external and internal environment.

Delegated Responsible Subject (DRS): An employee designated by the Board of Directors, responsible for reporting to the PRS on the implementation of the CPM's proper functioning concerning a specific risk area.

5. Fundamental Principles and Guidelines of the Model

→ The Company shall persistently maintain an effective organizational, management, and supervision system to prevent the crimes outlined in the Law and its amendments, known as the "Company's Crime Prevention Model."

→ This model will promote the prevention of the crimes listed in the first article of the Law, as well as any future offenses that may be added.

→ Considering the above, the Directors, Executives, employees, and third parties connected to the Company—such as suppliers, contractors, advisors, agents, and clients—are explicitly forbidden from engaging in any acts that could constitute a crime or behavior that might result in criminal liability for the Company.

→ The application and enforcement of the standard DRS set by the CPM are the responsibility of a professional known as the Principal Responsible Subject, hereinafter referred to as "PRS." This individual will have the necessary autonomy to carry out their duties and will be appointed by the Company's Board of Directors.

→ The Board of Directors, senior management, and the PRS of the Company share collective responsibility for adopting, implementing, managing, updating, and supervising the CPM.

→ The Board of Directors will grant the PRS the tools and authority needed to develop its functions and activities, including the necessary resources and materials to perform its tasks effectively.

→ The PRS has access to information relevant to its scope of action and the company's management to inform the Board of Directors about the CPM's performance at least twice a year, or whenever the entity's circumstances change necessitate.

→ EThe PRS will distribute and communicate to all employees the Company's CPM, including the roles and responsibilities that stem from it, as well as the penalties for non-compliance.

→ The Company will ensure compliance with all applicable laws, regulations, and procedures related to the offenses indicated in the Law and its amending laws.

→ The CPM will be revised whenever there are significant changes in business conditions or legal updates, with the PRS overseeing these updates.

6. Responsibilities and Functions

6.1. Board of Directors

The Board of Directors primarily oversees the proper implementation and efficient operation of the CPM. It also holds the responsibility for appointing the PRS, ratifying and extending their term, and establishing their means and powers to fulfill their duties.

The Board of Directors must receive the PRS report at least twice a year.

6.2. Management

The Company's various management teams play a crucial role in supporting and assisting the PRS with implementing the CPM and ensuring it operates effectively.

6.3.Principal Responsible Subject (PRS)

The official appointed by the Company's Board of Directors to manage, supervise, and execute this CPM.

The PRS's mission is to reflect the Company's values through its actions.

To accomplish this mission, the individual in this role must possess impeccable character and a thorough understanding of the responsibilities and functions within each department.

Similarly, the individual should be knowledgeable about the applicable legislation and regulations issued by the regulatory authorities, as well as the Internal Rules of Order, Health and Safety protocols, the Crime Prevention Model, and all internal policies, protocols, and procedures of the Company.

The PRS must operate with sufficient independence while carrying out their duties, possessing effective management and supervision powers, and having direct access to the Company's administration. They are required to report their actions to the Board of Directors at least twice a year.

6.4. Delegated Responsible Subject (DRS)

The DRS is the employee appointed by the Board to report to the PRS on how well the CPM functions for a specific risk area.

6.5. Compliance Committee

The Compliance Committee is responsible for overseeing adherence to regulations and internal policies designed to prevent crime and ensure compliance with these policies.

It functions as a monitoring, oversight, and consulting body, providing strategic guidance for compliance management and ensuring that the Company's practices align with applicable laws and regulations.

This Committee, composed of the DRS and chaired by the PRS, ensures representation from all key areas of the company to facilitate proper implementation of the CPM.

6.6. Support areas for the Crime Prevention Model.

The support areas for the CPM include, but are not limited to, the following:

- → Legal Advisors;
- → Finance;
- → Internal Audit;
- → Internal Control;
- → Human Resources Management

6.7. Employees and Third Parties

→ They must comply with the provisions of this CPM, the Code of Ethics and Conduct, and the Company's Internal Regulations on Health, Order, and Safety.

→ Report any situations that may conflict with the guidelines of this CPM using the designated channels.

7. Model Activities

The CPM shall be developed through a series of activities intended to support its operation and execution. These activities are the responsibility of the PRS and are classified as follows:

7.1. Prevention activities.

Effective prevention strategies aim to stop inappropriate behaviors or omissions early on. The goal of these preventive measures is to prevent violations of the CPM and to deter the commission of crimes specified in the Law.

→ Internal Regulations of Order, Health, and Safety. In accordance with Article 4 of the Law, the Company's Internal Regulations on Order, Health, and Safety must include internal obligations, prohibitions, and sanctions related to the offenses outlined within the referenced legislation.

→ Corporate Policies.
The Company will develop guidelines and procedures within its policies to achieve the objectives of adopting the CPM. These policies will be binding for all employees and, where possible and legally enforceable, also extend to third parties interacting with the Company.

→ Contract clauses.
In accordance with Article 4 of the Law, these provisions will be incorporated into the employment contracts between the Company and its employees. They will also apply to all agreements the Company

enters into with contractors, service providers, or similar entities, and will include obligations, prohibitions, and sanctions specified in the Law, hereafter called 'Compliance Clauses."

→ Communication and training.
All company employees should be informed about the scope of the law; therefore, the PRS must ensure that they have a clear understanding of this.

• Communicate CPM policies and procedures effectively across all levels of the organization, including top administrative authorities and senior management. Keep a record of attendees at training sessions and include this information in reports.

• The inclusion of CPM subjects and their related crimes in the Company's induction programs and training plan.

• Conducting regular training on:
- The CPM and its main components.
- Law No. 20.393 on the Criminal Responsibility of Legal Entities.
- Reporting channels.

7.2. Detection activities

The purpose of these activities is to detect any violations of the CPM and any crimes outlined by this law. Detection efforts related to the CPM include, among other things, the following:

→ Risk and Audit Matrix.
The PRS, along with specialized units, is responsible for identifying and analyzing the risks of committing crimes. This process should be conducted annually or whenever there are significant changes in the Company's operational conditions.
To perform this activity, the Company is required to:
1) Identify and evaluate risk.
2) Identify and evaluate controls.
3) Establish mitigation measures in case of non-compliance.

The Company's Crime Risk Matrices will document the process of identification and risk analysis.

→ Continuous Monitoring
A semiannual review of the existing CPM controls will be conducted, with particular attention to the priority processes that carry the highest exposure or risk to reputation.

→ Whistleblowing channels
The Company has confidential and anonymous whistleblowing and complaints channels that enable anyone with information about an act or fact that violates the law, its amendments, or deviates from the principles in the Company's Code of Ethics and Conduct—whether committed by personnel or related entities—to report directly to the appropriate authorities PRS.

The whistleblowing channels are confidential, allowing clients, employees, suppliers, service providers, contractors, and interested third parties to communicate or report violations of the CPM, the Code of Ethics and Conduct, and current legislation.

The Whistleblowing channels are as follows:•
Whistleblowing channel:
http://vinacyt.com/informacion-legal.
• Mailboxes in the farms and warehouses.

- Corporate email:
denuncias@conchaytoro.cl
- By messaging or courier to:
Av. Nueva Tajamar 481, Torre Norte, Piso 15, Las Condes, Santiago - Chile.

Employees and third parties who suspect or have indications of any criminal activity or violations of the behaviors outlined in the CPM, Policies, and/or the Company's internal Procedures must report it to the PRS using one of the previously specified methods.

In any case, if a verbal or written complaint is made directly to the supervisor, the supervisor will forward the complaint to the PRS.

7.3. Response activities

Response activities aim to create corrective actions, resolutions, disciplinary measures, and/or sanctions for those who breach the CPM or are found to have committed a crime as defined by law. Part of these activities includes reviewing the control measures that were violated, with the goal of strengthening them or replacing them with new, more effective controls.

The CPM response activities include, among others:
→ EEvaluation, investigation, and resolution of complaints.
→ Sanctions and disciplinary measures.
→ Reports to the justice system, as appropriate.
→ Create containment strategies for scenarios that might include legal non-compliance.

7.4. Supervision, training, and monitoring activities of the Model.

A The PRS or their designee must regularly verify, through monitoring or compliance audits, that the CPM controls are operating as intended.

→ The PRS must oversee and audit the correct implementation of detection, prevention, and related procedural activities.

→ If any non-compliance is identified, it should be reviewed and analyzed to understand how the described violations occurred, assess whether adequate and/or effective controls were in place, and determine which controls failed within the process.

→ The PRS must consult the complaints and investigations register where signs of violations or infractions connected to the crimes specified in the Law have been identified.

According to its mandate, the PRS can seek assistance from support departments within the organization to conduct surveillance, provided those departments are not part of the activity under investigation.

7.5. Whistleblowing and Investigations

Under the law, the PRS must coordinate and oversee investigations arising from complaints that affect the CPM or involve suspicion of a crime.

It must describe the activity that leads to the procedure in a step-by-step manner, considering who is involved, their actions, how the activity is performed, when it occurs, and where it takes place.

The Company expects its members to take responsible measures to prevent non-compliance with the CPM, seeking guidance and promptly addressing any issues that may arise.

To achieve this, the general principle is that if there are doubts or suspicions about potential violations of the CPM, internal Company rules, or other regulations affecting its activities, all employees, including third parties, are encouraged to submit a report through the established Whistleblowing system Channels.

However, whistleblowing channel users must use them responsibly and in good faith.

7.6. Complaints before the justice system

If an incident with potential criminal implications is identified, the PRS must assess, in consultation with the company's senior management, the possibility of initiating legal action before the courts, the public prosecutor's office, or the police. This step acts as a mitigating factor regarding the legal entity's possible criminal liability, as described in Article 6 of the Law, which states that:

"The legal entity will be considered to have substantially collaborated if its representatives report criminal conduct to the authorities or provide information to clarify the facts at any point during the investigation or judicial process, even before the entity is aware that the proceeding is directed at it."

8. Sanctions

Employees or members of the Company who fail to comply with this Manual and the Company's Policies may face sanctions as outlined in the Company's internal rules or in accordance with current legal regulations.

For advisors, contractors, or suppliers, failing to meet the terms or conditions set in the CPM can result in the immediate termination of the relationship. Employees of the Company should be aware that they may be subject to internal investigations if there is any indication or complaint regarding a violation of any law or internal organizational regulation, in accordance with applicable legal and relevant standards.

Employees must fully cooperate with internal investigation procedures conducted within the framework of the CPM. The policies and procedures outlined in this document are mandatory and are part of the duties and responsibilities assigned to each worker.

9. Annexes

Annex I. Groups of economic crimes, Law 20.393.

1. Crimes Against the Economic Public Order.
This set of crimes poses a threat to the functioning of the market and the overall economic system. In this context, severe anti-competitive behaviors such as collusion or price fixing are subject to penalties.

2. Bankruptcy-related Crimes.
This group of crimes erodes trust in contractual relationships and primarily harms the debtor's assets. Consequently, the creditor's attempts to recover their debt through fraudulent means are obstructed, especially if the debtor is in liquidation or was aware of the company's poor condition beforehand.

3. Crimes against Public Faith.
Crimes against public faith involve attacking the truthfulness of information, including the falsification of private or public documents. These crimes weaken one or more functions of documents in legal transactions, such as preservation, authentication, and other evidentiary purposes.

4. Crimes in Banking and Insurance Activities.
Engaging in the banking and insurance sectors is forbidden without the necessary registrations and permits. This module also covers a series of illegal acts that undermine trust and the proper functioning of the financial and insurance systems. It includes crimes such as providing false information to the Central Bank of Chile, as well as submitting incorrect data related to international exchange operations. It addresses the forgery of letters of credit, which damages their authenticity and trustworthiness. Maliciously obtaining credit by securing financing through deceptive or fraudulent means is also part of this module. Additionally, it covers the fraudulent issuance of checks, where there is an intent to commit fraud by issuing checks without funds or with false information.

5. Crimes against Property.
Crimes against property endanger the integrity of equity and harm the victim. They include acts like fraud through deception or abuse of trust.

6. Crimes against the Environment.
Crimes against the environment can be classified into:

→ General Environmental Crimes are violations that endanger the environment's health and people's right to live in a pollution-free world. They include pollution that causes serious damage to the sea, air, or land. Such crimes can also happen through negligent discharge or release of harmful substances.
→ Crimes against environmental institutionalism, for example, when maliciously false information is provided to regulatory authorities or when any attempt is made to prevent such oversight in any way.
→ DSectoral environmental crimes are defined in specific laws, such as the Forest Law, Fishing Law, REP Law, National Monuments Law, Hunting Law, and the International Trade of Threatened Species of Flora and Fauna Law, among others.

7. Crimes against Public Administration.

These crimes relate to public administration and mainly involve public officials. The primary criminal offense is bribery of a public official, whether domestically or internationally. Bribery consists of offering or accepting benefits in exchange for an improper act by a public official.

A Public Official is anyone holding a public office or role, whether in the central government, semi-autonomous institutions, companies, municipal, autonomous entities, or organizations created or controlled by the State. This includes individuals who are not appointed by the Head of State or who do not receive a salary from the State. Even if the position is filled through an election by popular vote, it still falls under this definition.

8. Crimes against Intellectual and Industrial Property.

Crimes against intellectual and industrial property protect individual property interests by safeguarding rights that arise from certain creations or innovations. These offenses typically involve the unauthorized exploitation of such property. Examples include the misuse of trademarks or distinctive signs to exploit their prestige and reputation.

9. Tax and Customs Crimes.

These refer to malicious violations of tax laws, specifically designed to evade taxes and penalties. Such violations include intentionally omitting information in submitted declarations that are used for tax assessment. Examples of behaviors that fall into this category include deliberately providing false or incomplete declarations to reduce the calculated taxes, increasing tax credits through withholding taxes, creating false scenarios to obtain fraudulent refunds, submitting false information to tax authorities, and other conduct that breaches tax regulations.

10. Cybercrime.

Cybercrimes endanger the integrity of computer systems. Actions aimed at accessing, manipulating, altering, or deliberately destroying these systems and the data within them are punishable offenses. Receiving computer data obtained from any conduct sanctioned by Law No. 21,459 will also be penalized.

11. Crimes against Social Security and Personal Integrity.

Labor violations aim to protect workers' rights through criminal prosecution and enforcement. This category encompasses crimes related to social security contributions, wages, and the physical and mental well-being of workers. Some of these offences include the following:

→ Payment and withholding contributions

Employers are penalized if, without the worker's consent, they fail to withhold or pay the worker's social security contributions or report a taxable or gross income that is less than the actual amount, thereby reducing the contribution amount. This offense is also established if the department responsible for workers' wages diverts part of the collected social security contributions, harming the workers' benefits.

→ Individual safety of people

It includes threats that a worker might face, which are crimes against persons caused by reckless negligence without intentional harm, such as severe injuries.

→ Workers' salaries

Paying excessively low wages that are also below standard is heavily penalized when it takes advantage of an employee's need, inexperience, or inability to recognize the unfairness. In this context, if a company employing foreign workers who do not speak Spanish pays them less than the legal minimum, and this pay is significantly lower than what Chilean workers doing the same work earn, it would be considered unlawful conduct.

→ Negligence against people

Crimes committed through reckless or culpable negligence—such as by doctors and pharmacists—will be penalized. This includes offenses like homicide, mutilations, castrations, and both serious and minor injuries.

12. Crimes against Public Health.

This group aims to protect the health, physical integrity, and property of the general population.

13. Regulatory Crimes

This module also covers other offenses related to regulatory violations, such as telecommunications crimes or breaches of the General Urban Planning Law.

14. Corporate Crimes.

These crimes endanger the social interests of corporations and their shareholders. The punishable actions are those that intentionally harm these interests and occur within the company's management. This group includes offenses such as providing or approving false information about the corporation's key financial, patrimonial, or legal details, as well as abusive agreements that damage minority shareholders.

15. Crimes against the Securities Market and other financial crimes.

Crimes against the Securities Market undermine the proper functioning of the market where publicly offered securities are traded. The key factor related to these crimes is the availability of information. Multiple offenses aim to punish or suppress conduct involving the misuse of information about these securities, their issuers, or transactions involving these securities, including the cancellation or modification of orders related to these instruments. Additionally, acts that seek to evade the oversight of the Securities Market Commission are also subject to penalties.

16. Crimes related to money laundering, receiving illicit funds, and other specific offenses.

These are specific figures that operate after a crime is committed; they tend to complete the act.

The crime of money laundering, as defined in Article 27 of Law No. 19,913, is committed by individuals who: a) hide or disguise the illegal origin of certain assets in any way, knowing they come, directly or indirectly, from criminal activities; b) directly conceal those assets; or c) use them for profit. In all cases, the individuals involved know or should have known about the unlawful origin of such money or assets.

The facts that constitute crimes potentially linked to assets whose origins are being concealed or laundered include illegal drug trafficking, terrorism, arms trafficking, financial statement fraud, obtaining bank loans through false records, embezzlement of public funds, tax evasion, crimes against intellectual property, child abduction, child pornography, human trafficking, and migrant smuggling, among other illegal activities.

Terrorism financing, as defined in Article 8 of Law No. 18,314, involves acts by a person who intentionally provides or collects funds through any means, directly or indirectly, with the illicit goal that these funds be used, or known to be used, wholly or partly, to commit one or more acts of terrorism by a terrorist organization or terrorist.

The crime of receiving illegal gains penalizes individuals who, with knowledge or reasonable suspicion of the source, possess items that are stolen, robbed, or acquired through cattle rustling, as well as items obtained through reception or misappropriation. They then transport, purchase, sell, alter, or commercialize these items in any manner, regardless of the prior context of their disposal.

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