

Patricio Butrón Vineyards



CODE OF ETHICS

YEAR 2024

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VERSION

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1. INTRODUCTION

The Code of Ethics of Viñedos Patricio Butrón along with the Sustainability Policy, frame the scope in which its permanent and temporary employees, executives, advisors, contractors, subcontractors and suppliers must act, as well as guide our relationship with customers, suppliers, public agencies and the community regarding our environment and complying with current legislation.

Viñedos Patricio Butrón is a family business dedicated to the production of wines established in 2002, this document defines our ethical behavior, what we collectively as a company, based on obtaining a positive result both in terms of sustainability and society.

This Code defines what ethical behavior is for us. In other words, we define what we collectively aspire to be as a company and what we expect of ourselves as individuals.

Therefore, all employees and collaborators of Viñedos Patricio Butrón must act in accordance with our Code of Ethics, actively applying and defending its values, principles and rules. Likewise, all interested parties that are related to Viñedos Patricio Butrón, must abide by our Code of Ethics.

We must always bear in mind that a breach of the values, principles or rules of our Code of Ethics is a serious fault that can lead not only to legal responsibilities, either individually or for Viñedos Patricio Butrón as a whole, but can also affect the reputation of the company.

All executives and managers of Viñedos Patricio Butrón must also strictly apply and comply with this Code of Ethics.

In order to fully understand this Code of Ethics, all employees of Viñedos Patricio Butrón must:

Carefully read, understand and apply the values, principles and rules of the Code of Ethics in their daily activity.

- Seek immediate support from their superior or contact the Ethics Committee, when they have the slightest doubt or concern regarding the application of this Code.

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General Manager
PATRICIO BUTRON ABDALA

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2. OUR VALUES

The ethical guidelines that are generated from this Code are born from our fundamental values, which are:

1. RESPECT FOR ALL PEOPLE
2. INTEGRITY OF OUR BUSINESS PRACTICES
3. ENVIRONMENTAL RESPONSIBILITY

3. OUR PRINCIPLES

3.1. BUSINESS ETHICS

◆ Ethical Conduct.

The use of corrupt practices such as bribes, bribery, illegitimate pressure, bribery to obtain commercial advantages is expressly prohibited. We implement safeguards to fulfill this purpose, such as training of our personnel.

◆ Fair Competition

We believe in free and open competition, which is why we explicitly promote fair competition as a business value, incorporating policies and regulations relating to free competition and committing not to engage in acts such as collusive agreements, abuse of dominant position or "predatory" practices.

Antitrust laws, also known as competition laws, are intended to ensure that competitive markets operate. Failure to comply with them can mean significant penalties, both to our company and to individual offenders.

All employees and collaborators of Viñedos Patricio Butrón must strictly comply with all these antitrust or competition laws.

We promote full transparency in the drafting of our business documents and highlight the advantages of Viñedos Patricio Butrón, instead of underlining the weaknesses of our

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competitors.

We do not intentionally denigrate, discredit or defame our competitors and we do not commit to offering our wines if we are unable to produce them.

3.2. ETHICAL PRACTICES WITH THE STATE

All workers of Viñedos Patricio Butrón who interact with State officials must prevent or avoid practices that violate the laws of the State related to Probity, Bribery and Transparency, in order to respect the legal system and refrain from carrying out any activity that is outside of these legal regulations.

All workers of Viñedos Patricio Butrón must maintain a respectful and honest relationship with public officials, responding efficiently, integrally and transparently to the information they request.

On the other hand, any worker who becomes aware of dishonest actions by public officials must immediately notify their direct superior. In this instance, the respective verifications will be carried out, the complaint will be resolved and channeled to the relevant authority.

3.3. RELATIONSHIP WITH SUPPLIERS.

Our goal is always to maintain a cordial and mutually respectful relationship with suppliers, establishing a mutually beneficial and long-term relationship. Bad practices such as accepting commissions, undue pressure, etc., are absolutely prohibited. The company will frequently control the purchasing process of supplies or services by the workers; if any bad practice is detected, both parties will be placed at the disposal of the civil justice.

We aspire that our suppliers act in accordance with our code, selecting them through objective criteria, as well as their level of compliance with our Code.

We also **take steps** to ensure that our suppliers understand the standards we apply in our company, through meetings, visits to their facilities, among others, and in conjunction with this, we have developed a **Charter for Suppliers**, in order to bring together in a single document the expectations we have regarding the ethical practices of our suppliers.

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3.4. HUMAN RIGHTS

◆ Child Labor Under 15 Years of Age

We do not accept the recruitment of staff under 15 years of age, always respecting the requirements of the national legislation in force, because we strongly reject child labour, respecting the provisions of the ILO Conventions and the United Nations Conventions.

◆ Child Labor Children Under 15 and 17 Years of Age

Labor contracts may be entered into with minors under eighteen years of age and over fifteen only to perform light work that does not harm their health and development, provided that they have the express authorization of their father or mother; in the absence of them, the paternal or maternal grandfather or grandmother; or in the absence of these, of the guardians, persons or persons institutions that have taken responsibility of the minor, or in the absence of all of the above, of the Inspector of the respective labor service. Employment contracts must be registered in the respective Labor Department, in accordance with Art. 13 of the Labor Code and Art. sole No. 1 Law No. 20,189.

◆ Forced Labor

We do not accept any form of forced labour or exploitation, as we believe first and foremost in respect of the dignity of people, and we consider it unacceptable to keep any person under threat in order to carry out activities against their will.

◆ Discrimination

We do not discriminate against or support discrimination throughout our supply chain on the basis of: gender, sexual orientation, age, race, religious belief, political opinions, nationality or immigrant status, disability, social origin, or for any other reason unrelated to the duties to be

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performed in the position or profile in question. In this way, we ensure that we support and respect what the State has proposed, regarding the labor inclusion of the most vulnerable groups.

◆ Harassment

We promote that all our employees feel respected and valued, so none 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; thus, any type of sexual misconduct is prohibited. Sexual harassment is understood as when a person improperly makes, by any means, requests of a sexual nature, not consented by the recipient and that threaten or harm their employment situation or their employment opportunities.

If it has been proved that a worker from Viñedos Patricio Butrón has exercised harassment of any kind and he/she has been legally sanctioned, they will be immediately dismissed without the right to compensation.

Do not interfere in the worker's union activities.

Not to harm a worker in any way, due to his or her lawful union or union work activities

Viñedos Patricio Butrón encourages its employees to report any abnormal situation related to this aspect, which must be reported to their direct supervisor or to the Ethics Committee.

We also prohibit forced labour, the use of physical punishment, mental or physical coercion, verbal abuse and inhumane treatment from our workers.

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3.5. QUALITY OF WORK LIFE

◆ Equal Opportunities

We provide equal opportunity access to all positions, aiming for the elimination of gender wage gaps, and we will not consider arbitrary any objective difference in remuneration that is justified, among other reasons, by abilities, qualifications, suitability, responsibility or productivity.

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

3.6. EMPLOYEE PARTICIPATION

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

To facilitate the participation of workers, 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 in each case.

On the other hand, we encourage communication between company executives and workers, to address issues of mutual benefit, related to management, as well as incentives, achievement of results, goals and work environment.

3.7. FREEDOM OF ASSOCIATION

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Viñedos Patricio Butrón does not hinder freedom of association and the right to union bargaining within the company, and this is something that is well known by its workers.

Workers are free to elect their representatives and leaders. No discrimination, harassment, intimidation or retaliation of any kind is permitted against those who are part of trade unions, associations or other types of workers' organizations.

3.8. LABOR LEGISLATION

As a basic principle, we are governed by a strict control of current labor laws, so that all our staff, hired and subcontracted, have a current employment contract, receive a remuneration that complies with the stipulations of labor law, the corresponding legal discounts are made and paid, and the legal requirements for working hours are respected.

We work for and demand that subcontractor companies guarantee compliance with labor laws.

In addition, we do not differentiate or discriminate against subcontracted personnel by providing the same working conditions and training with respect to those offered to the company's personnel, when they perform the same type of work.

3.9. HEALTH AND SAFETY

The health and safety of Viñedos Patricio Butrón's employees is a constant concern that we guarantee through the application of programs that consider safety, prevention, health care, and emergency standards, among others.

3.10. HEALTHY LIVING

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

3.11. ALCOHOL AND DRUG ABUSE

We are aware that we are a supplier of alcoholic beverages, therefore we are very committed to

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raising awareness among our workers and their families about the risks of abuse and inappropriate use of wine.

As a company we also categorically reject the use of drugs or illicit substances in the workplace, which is why we develop prevention and treatment programs for drug addiction.

3.12. COMMUNITIES

Beyond compliance with the applicable laws and regulations in force, Viñedos Patricio Butrón identifies its communities where it has influence, evaluates the impacts produced on them due to its productive activities, originating an action plan to minimize or enhance the negative or positive effects respectively.

We establish permanent communication channels with the community and its local authorities that allow us to get involved in it. Through these channels we are informed of the expectations and interests of the community with the company, in order to work together for the development of specific projects that improve the quality of life of its inhabitants.

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

We encourage the participation of workers and collaborators in social projects with the local community. To this end, we make it easier for workers to carry out this work and get involved in some of these initiatives through the coordination of activities related to institutional purposes.

As part of our effort to cooperate in the development of the community surrounding the company, we privilege 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.

3.13. MARKETING

We support our communication policies and marketing campaigns with our values and ethical principles, communicating internally and externally, transparently and truthfully our actions in any

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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 situations, of risk or harm, as well as campaigns that denigrate or belittle people or groups, especially on racial, political, ethnic, religious grounds or because of their sex or sexual orientation.

3.14. ETHICAL SALES

We formally and explicitly prohibit unethical sales practices such as pressure, deception, undue influence, extra payments, etc. This principle is the basis for the development of our commercial and sales activities and is known by the commercial area.

We handle our customers' information respectfully, without harming their privacy. Therefore, the information of our customers, to which we have access, will always be treated confidentially.

We implement safeguards to fulfill this purpose, such as training for personnel, passwords for access to information, among others.

3.15. CONFLICTS OF INTEREST

Commercial decisions must always be based on objective reasons and criteria, so all employees of Viñedos Patricio Butrón must be aware that in the face of a conflict of interest, which occurs when personal interests, those of family members or related persons, are greater or differ from the interests of Viñedos Patricio Butrón.

Some common conflicts that we need to recognize and avoid include:

- Have a personal or work relationship with a supplier company, customer, competitor or subcontractor.
- Have an investment or share in any supplier company, customer, competitor, subcontractor, or other company.

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- 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.

Therefore, if any member of Viñedos Patricio Butrón is in a relationship or activity that may involve a conflict of interest, they must disclose to their direct supervisor or the Ethics Committee and obtain written approval before continuing.

3.16. ENVIRONMENT

At Viñedos Patricio Butrón we are committed to respecting and caring for the environment, as well as complying with environmental laws and regulations, both in Chile and in the countries where we are present.

We diagnose the main positive and negative impacts that our activities cause to the environment, and we implement controls to mitigate the negative impacts, mentioning among them:

- In the vineyards, we prioritize pesticides with low environmental impact, also respecting the requirements stipulated by the green area of the Sustainability Code, in terms of doses, monitoring, alternation, among others.
- We have an Industrial Liquid Residues plant that complies with current regulations, maintaining permanent control of liquid waste, avoiding water and odor contamination.
- We maintain close control of the management of water, electricity and fuels, keeping records of monthly consumption to achieve established goals and making efficient and responsible use of these resources.
- We develop a waste management plan, where they are classified, stored and disposed in authorized places.

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4. ETHICS AND WHISTLEBLOWING COMMITTEE.

The Ethics Committee is the entity that sanctions if an action corresponds to a violation or failure to comply with any of the principles of this Code and its duties include:

- Be a supporter to the company's ethical concepts and standards.
- Attend to staff queries and analyze the reported cases.
- Investigate and document the cases.
- Generate sanctions.
- Maintain statistics and reports.
- Mailbox

The Ethics Committee will be composed 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 Management of the Winery.

Any breach of the Code of Ethics detected by any employee of Viñedos Patricio Butrón, must be reported to their direct supervisor or to the Human Resources office, any of them who receive this information must inform the Ethics Committee to analyze the case and determine the respective sanctions if applicable.

The identity of the worker who reports a violation of this code will be kept confidential, if it is expressly requested by him/her.

Finally, we encourage all employees to raise issues and seek guidance on ethical issues, as well as safety, quality, and the environment.

5. VALIDITY

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

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