

The Manual for Handling Market-  
Relevant Information of  
Viña Concha y Toro S.A. and its  
Subsidiaries

August 2021

## OBJECTIVE

In accordance with the provisions of Article 16 of Law No. 18,045 on the Securities Market, recently amended by Law 21,314, and in compliance with the provisions of General Rule No. 30 and No. 270 of the Superintendence of Securities and Insurance (SVS), hereinafter referred to as the Financial Market Commission (CMF), the Board of Directors of Viña Concha y Toro S.A. at a meeting held on August 26, 2021, has decided to update and disseminate the following Manual for Handling Market-Relevant Information (the Manual), fully replacing the Manual approved at a Board of Directors meeting held on March 25, 2010.

The purpose of this Manual is to establish self-regulation guidelines governing the handling of information that, while not classified as material or essential, is useful for a proper financial analysis of Viña Concha y Toro S.A. and its subsidiaries or the securities issued by them. This concept encompasses all legal, economic, or financial information related to significant aspects of the company's operations or that may have a significant impact on them

In consideration of the aforementioned, the purpose of this Manual is specifically to inform the market about: (a) the type of information that will be made available to investors; (b) the procedures and control mechanisms implemented, as well as the responsibilities assigned by the Company, to ensure the truthful, sufficient, and timely disclosure of any material fact or essential information regarding the

Company and its businesses as soon as it occurs or becomes known; and (c) the procedures, control mechanisms, and responsibilities under which directors, managers, administrators, and key executives, as well as entities directly or indirectly controlled by them, may acquire or dispose of securities issued by the Company or its subsidiaries, or securities whose price or performance depends, in whole or in significant part, on the variation or performance of the price of such securities

In the event of discrepancies or doubts between the provisions of this Manual and the provisions of Law No. 18,045 on the Securities Market and regulations issued by the CMF, the provisions contained in the latter shall prevail

The responsibility for transactions involving publicly offered securities issued by the Company or its subsidiaries is personal. Consequently, the ultimate responsibility for understanding and complying with applicable legal provisions lies with those conducting such transactions, and not with Viña Concha y Toro S.A. or its subsidiaries

## 1. Definitions:

The following terms shall have the meanings ascribed to them, without prejudice to other terms defined elsewhere in this Manual:

- ▶ **Obligated Reporting Administrators:** means the directors, managers, administrators, and senior executives of the Company, as well as entities controlled directly by them or through third parties.
- ▶ **Derivatives of Securities:** Means contracts or securities whose price or outcome depends on or is significantly conditioned, in whole or in a significant part, on the variation or performance of the price of other securities. For the purposes of determining whether the price or outcome of a security or contract depends on or is significantly conditioned by the variation or performance of the price of other securities, the provisions of NCG 269 shall apply, as it may be modified or replaced by the CMF.
- ▶ **Financial Statements:** Means the financial statements of Viña Concha y Toro referring to any quarterly or annual period that it must submit to the CMF and the stock exchanges in the country in accordance with the instructions issued for this purpose by the CMF.
- ▶ **Subsidiary:** A subsidiary of a corporation, referred to as the parent company, is one in which the parent company directly or through another natural or legal person controls more than 50% of its voting capital or capital if it is not a corporation by shares, or can elect or appoint, or cause to be elected or appointed, the majority of its directors or administrators
- ▶ **Confidential Information:** For the purposes of this Manual, it means: (a) Material Nonpublic Information before being communicated to the CMF; (b) Restricted Information; (c) Insider Information; (d) Market-Relevant Information before being disclosed to the market; and (e) information pertaining to the legal, economic, and financial situation of the Company that has not been disclosed to shareholders and the public..
- ▶ **Material Fact or Information:** According to Article 9, Section 2 of the LMV, it is information that a prudent person would consider important for their investment decisions
- ▶ **Market-Relevant Information:** Means all information that, while not qualifying as a Material Fact or Information, is useful for a proper financial analysis of the Company and its Subsidiaries, their securities, or their offering. Within this concept, for example, all legal, economic, and financial information pertaining to significant aspects of the company's operations, or which may have a significant impact on them, shall be included.
- ▶ **Confidential Information:** According to Article 10 of the LMV, it is information that has been designated as such by the approval of at least three-quarters of the directors in office, considering that it cumulatively meets the following conditions:
  - It refers to pending negotiations; and, The disclosure of such information could harm the corporate interest. It should be noted that the fact that
- the awareness of the negotiations potentially affecting the stock price of the company does not constitute sufficient reason to be invoked as detrimental to the corporate interest
- ▶ **LMV:** Stands for Law No. 18,045 on the Securities Market
- ▶ **LSA:** Stands for Law No. 18,046 on Anonymous Companies
- ▶ **Manual:** Significa el presente Manual de Manejo de Información de Interés para el Mercado, más todos sus anexos que estén previamente definidos como tales por el Directorio.
- ▶ **NCG 30:** Refers to General Rule No. 30 issued by the SVS on November 10, 1989, as amended to date, and as it may be modified or replaced by the CMF in the future.
- ▶ **NCG 269:** Refers to General Rule No. 269 issued by the SVS on December 31, 2009, as it may be modified or replaced by the CMF in the future.
- ▶ **NCG 270:** Refers to General Rule No. 270 issued by the SVS on December 31, 2009, as it may be modified or replaced by the CMF in the future.
- ▶ **NCG 277:** Refers to General Rule No. 277 issued by the SVS on December 19, 2009, as it may be modified or replaced by the CMF in the future.
- ▶ **Website:** Refers to the Company's Internet site, [www.vinacyt.com](http://www.vinacyt.com).
- ▶ **Securities Registry:** Refers to the Securities Registry maintained by the CMF.
- ▶ **Company:** Refers to Viña Concha y Toro S.A..
- ▶ **SVS:** Significa la Superintendencia de Valores y Seguros de la República de Chile.
- ▶ **SVS:** Stands for the Superintendency of Securities and Insurance of the Republic of Chile
- ▶ **Transaction:** Refers to the acquisition or disposal of securities issued by Viña Concha y Toro or derivatives of securities issued by Viña Concha y Toro
- ▶ **Securities:** Refers to any class or type of publicly offered securities, as indicated in Article 3 of the LMV.
- ▶ **Viña Concha y Toro:** Refers to the company Viña Concha y Toro S.A. and its Subsidiaries.

## 2. Persons to whom the Manual applies:

The persons within Viña Concha y Toro to whom the Manual applies are the following: i) the managers obliged to report, and ii) persons who by reason of their position, position, activity or relationship with Viña Concha y Toro have access to the information, such as external auditors, banks and lawyers, among others.

## 3. Corporate body in charge of establishing the provisions of the Manual:

The Company's Board of Directors shall be responsible for establishing and approving the contents of the Manual, as well as its eventual modifications, updates and amendments.

## 4. Corporate body or Members of the Administration responsible for enforcing compliance with its contents:

The Chief Executive Officer of the Company shall be responsible for enforcing compliance with the contents of the Manual, either personally or through those expressly delegated that function.

## 5. Securities Transaction Reporting Obligations:

Without prejudice to full compliance with the legal and administrative regulations in force, transactions of publicly traded securities issued by Viña Concha y Toro, carried out by the addressees of this Manual, either directly or through entities controlled by them or through third parties, as well as those transactions carried out by their spouses, if they are married in conjugal partnership, their minor children or those persons under their guardianship, custody or under legal or judicial representation, whether the latter are carried out directly or indirectly, must be reported to the Company's Prosecutor, who shall keep a confidential list of the transactions reported to him/her for this purpose. The information provided must contain at least the data set forth in Annex No. 1 of this instrument.

The addressees of this Manual are also advised that, pursuant to Article 12 of the LMV, certain persons are required to inform the CMF and the stock exchanges of the country where the company has securities registered for trading of any direct or indirect transactions they carry out on shares of companies with which they are related and whose shares are registered in the Securities Registry and, in addition, of any acquisition or disposal they carry out of shares of companies with which they are related and whose shares are registered in the Securities Registry.

The Company's financial statements are based on contracts or securities the price or result of which depends or is conditioned, in whole or in significant part, to the variation or evolution of the price of such shares.

The persons required to report in accordance with the above are:

- a) Those who, directly or through other natural or legal persons, hold 10% or more of the capital stock of the respective open stock corporation,
- b) Those who as a result of an acquisition of shares become owners of 10% or more of the shares of such company; and
- c) The directors, liquidators, administrators and managers of such company, regardless of the number of shares they own, directly or through other natural or juridical persons.

Compliance with this obligation is carried out in the manner and within the terms established in NCG 269, which are expressly reproduced in this Manual for all purposes.

## 6. Transaction Policy for Securities issued by Viña Concha y Toro or Derivatives of Securities of Viña Concha y Toro:

The Board of Directors has agreed that the Manual shall contain criteria to guide the conduct of the Directors obliged to report, in the treatment of Information of Interest and in the use of the same in relation to eventual Securities or Securities Derivative Transactions. In such

a) or Derivatives of Viña Concha y Toro's Securities, except for the existence of Lock-up Periods in which such Transactions are prohibited. Such periods are:

### 6.1. Regular Blocking Period:

In order to prevent the use of Privileged Information, there will be a regular blocking period during which the Administrators Obligated to Inform, directly or indirectly, may not carry out transactions of Securities or Derivatives of Viña Concha y Toro Securities within the thirty days prior to the disclosure of the information, quarterly or annual financial statements of the Company, and shall end at 24:00 hours on the stock exchange business day following the day on which the aforementioned financial statements have been disclosed, in accordance with the legal provisions in force. Consequently, as from the end of the regular lock-up period, there will be freedom for the Transaction of these Securities or Securities Derivatives, for the period until the beginning of the immediately following lock-up period.

For the purposes of this point, the Company shall publish on its website, at least 30 days in advance, the date of disclosure of its quarterly or annual financial statements.

## 6.2. Special Lock-Up Period:

There shall be special blocking periods for all the Directors obliged to report, during the period in which negotiations related to takeovers, mergers, acquisitions of Securities and other essential events of similar magnitude, whose results may affect the market price of Securities issued by Viña Concha y Toro, provided that the interested Directors obliged to report are or may be presumed to be aware of such information, in accordance with the applicable legal provisions and the provisions of this Manual.

The special lock-up period will expire at the moment in which such negotiations finally fail, or at the beginning of the first business day following the day in which the positive result of such negotiations is communicated to the public as an Essential Event.

## 6.3 Exception:

The blocking periods indicated in paragraphs 7.1 and 7.2 above are not applicable to any exercise of preemptive subscription rights of Viña Concha y Toro shares exercised by the holder within these periods, whether such rights arise from a single preemptive option period or from two or more successive periods.

## 7. Criteria and Mechanisms Applicable to the Disclosure of the aforementioned Transactions, as well as the Holding of Such Securities.

**7.1** The Directors obliged to report shall faithfully and timely comply with the reporting obligation imposed by Article 17 of the LMV, in accordance with the provisions of NCG 277, and shall communicate compliance with said obligation to the Company's General Counsel, by sending an e-mail to which shall be attached in pdf or similar format, the copy or copies of the communications made to the stock exchanges evidencing the respective compliance. Said e-mail must be sent on the same date on which the communications to the stock exchanges are made.

**7.2** Without prejudice to the foregoing obligation, the Managers Obligated to Report must communicate in writing via e-mail to the Company's Tax Officer, any Transaction they carry out with respect to Viña Concha y Toro Securities, as well as with respect to Derivatives of Viña Concha y Toro Securities. The communication shall be made immediately and at the latest within 1 business day from the date the respective Transaction is entered into.

**7.3** Persons acquiring the status of Administrators Obligated to Report as of the date of vi- **7.4 Persons** acquiring the status of Administrators Obligated to Report as of the date of vii.

In accordance with this Manual, they must inform the Company's Chief Executive Officer of their direct and indirect position in both Viña Concha y Toro Securities and in Derivatives of Viña Concha y Toro Securities, no later than the third business day following the date on which they acquire the status of Administrators Obligated to Report. This obligation is without prejudice to compliance with the obligations referred to in item 1 of this number 8.

The communications referred to in items 7.1 and 7.2 above shall be kept confidential by the Company's management.

## 8. Mechanisms for the Continuous Dissemination of Information of Interest:

### 8.1. Essential Information and Reserved Information.

(a) **Obligation:** The Company undertakes to truthfully, sufficiently and timely disclose any Material Information or Material Fact regarding itself, its business and the Securities it offers, at the time it occurs or comes to its knowledge.

(b) **Responsibility and Mechanism to Ensure Compliance**  
The Board of Directors is primarily responsible for ensuring compliance with this obligation. In line with the above and in order to ensure timely compliance with this obligation, the Board of Directors agreed at its meeting held on February 25, 2010 to authorize

to the Chief Executive Officer and the President of the Company so that any of them, acting individually, may qualify and report that a certain event is an Essential Event.

(c) **Procedure:** Any Essential Information or Fact must be reported to the CMF in accordance with the provisions of NCG 30, through the SEIL platform.

(d) **Reserved Information:** In the event that the Board of Directors has agreed to grant the reserved nature to certain information, the Company must communicate such circumstance to the CMF and comply with the rules and procedures for communication and updating of the Reserved Information contained in the NCG.  
30. Likewise, as soon as the reasons that motivated the withholding of information cease to exist, it shall inform the CMF of such circumstance, and in the event that the negotiations have been successful, communicate the respective Essential Event to the market.

### 8.2. Continuous Information.

The Company is obliged to provide the CMF and the public in general with financial, legal and commercial information on an ongoing basis, with the frequency and in the form determined by the CMF through generally applicable rules. The Company has the human and technological resources to faithfully comply with its obligation of continuous information.

### 8.3. Information of Interest.

All information related to Viña Concha y Toro that is not classified and disclosed to the market and/or the CMF as Essential Information or Fact or as Reserved Information, in accordance with the provisions of the LMV and NCG 30, and that meets the requirements established in the Manual to be considered Information of Interest, will be disclosed to the market according to the criteria set forth below:

Whenever any of the Directors Obligated to Inform delivers Information of Interest to the market or to a specific sector thereof, it shall be disseminated simultaneously or, if this is not possible, within the following 24 hours, to the general public through its publication on the Web Page, which shall be kept duly updated.

The obligation described above shall not apply if the Information of Interest is given to a third party in order to comply with any legal regulation or a contractual relationship in force with Viña Concha y Toro, provided that the recipient of the Information of Interest is legally or contractually obliged to keep the information received confidential.

### 9. Mechanisms for safeguarding confidential information:

Notwithstanding, the obligations with respect to Confidential Information and the penalties for non-compliance that may be imposed by the law, the

mentioned below, the Manual contemplates the existence of various mechanisms to ensure that the information that by law or these rules must be trusted by the public authorities is not disclosed to third parties. The mechanisms are as follows. These mechanisms are the following:

#### 9.1. List of Persons with Access to Confidential Information:

It is presumed in fact that those persons of Viña Concha y Toro who according to the LMV are subject to the obligations regarding Inside Information, are the persons who with respect to Viña Concha y Toro have access to Confidential Information.

In addition, with respect to these persons, or others as determined by the Chief Executive Officer, a confidentiality clause is understood to be included in their contractual relationship with Viña Concha y Toro, in the following terms:

*"Confidentiality of Information: There shall be an express obligation to keep confidential all Viña Concha y Toro Information classified as Confidential that it receives in the performance of its duties, in such a way that it may not disclose such information, without incurring in a violation with respect to the Manual for Handling Information of Interest to the Market, unless the recipient is aware of it, or its disclosure has been authorized or required by bodies exercising jurisdiction, within their competence."*

#### 9.2. Internal communication and storage mechanisms

All information that has the character of Confidential Information of Viña Concha y Toro S.A. will be communicated through electronic means, to the recipients of the same, expressly mentioning such confidential nature, so that it is clear to the recipient that due to the nature of the information he/she is receiving, he/she is subject to the provisions and restrictions of the LMV and this Manual with respect to it. Both those who disclose confidential information and those who receive it must strictly comply with the rules and requirements contained in the Corporate Information Security and Cybersecurity Policy<sup>2</sup>.

In addition, with respect to the storage of such information, the necessary measures will be taken to protect such data.

#### 10. Spokespersons or Official Representatives:

Whenever the Chairman of the Board, the Chief Executive Officer or the Corporate Manager of Finance and Corporate Affairs of Viña Concha y Toro S.A. address the media, the market in general or a specific sector of it, it shall be understood that the information they provide on that occasion is being made known to the market and the public in general by a formal means of Viña Concha y Toro S.A.

The foregoing, unless in such intervention the person in question makes a prior and express warning that he/she is not representing Viña Concha y Toro in the information he/she will provide at that time.

In the event that any relevant information appears in the media regarding Viña Concha y Toro, which does not come from the above-mentioned official sources, the company will be able to make an official statement or not regarding its veracity. The foregoing, unless it is required by the authority to do so, in which case the company may adopt any of the information methods contained in current legislation.

### 11. Dissemination of the Manual:

The Manual will be disseminated according to the following terms:

- a. A copy of the Manual shall be sent to the CPM, within 48 hours of its implementation or modification, when applicable.
- b. A copy of the same shall be sent to the Stock Exchanges of the country.
- c. The full text of the Manual shall be available to the general public at the Company's offices and shall also be published on the Web Page. Any updates to the Manual shall be disseminated in the manner indicated within 48 hours of approval by the Board of Directors.

<sup>2</sup> Internal record of the Corporate Information Security and Cybersecurity Policy (PG-TI-SI-01).

d. A physical copy of the Manual shall be delivered to each of the Reporting Administrators, informing them of its terms. It shall be the obligation of the Reporting Administrators to communicate the provisions of the Manual to their related third parties.

## Penalties:

### 12.1. Penalties imposed by the Company.

Violations against the provisions of the Manual will be considered as breaches of the obligation of loyalty that the persons bound by this Manual owe to Viña Concha y Toro.

If there is a contractual relationship between the offender and Viña Concha y Toro, violations will be reported to the General Manager, who will analyze them with a view to the possible adoption of sanctions. Such sanctions may include reprimand, recording of the facts for consideration in the future professional development of the offender within Viña Concha y Toro, termination of the contract in question and the possible reporting of the facts to the respective authorities. All of the above, according to the nature and seriousness of the facts and their consequences for Viña Concha y Toro, its shareholders and the market in general.

### 12.2. Administrative or criminal penalties.

The legislation penalizes non-compliance with the LMV as administrative misdemeanors or crimes.

Any non-compliance with the LMV that does not have a special sanction may be administratively sanctioned by the CMF, either through censure or fines. Such sanctions may also be imposed for non-compliance with the rules issued by the CMF in the use of its powers.

Notwithstanding the foregoing, certain conduct, including certain conduct related to Inside Information. The following are criminal offenses and are punishable by fines, imprisonment and disqualification from holding the position of director, administrator, manager or liquidator of a publicly traded corporation or any other company or entity issuing publicly traded securities or subject to the supervision of the Superintendency of Banks and Financial Institutions or the Superintendency of Pension Fund Administrators. Said criminal conducts are the following:

- a) The use of Inside Information to carry out an act, by oneself or through other persons, with the purpose of obtaining a pecuniary benefit or avoiding a loss, either for oneself or for third parties, through any type of operations or transactions with publicly offered securities; and
- b) Disclosing Inside Information in order to obtain a pecuniary benefit or avoid a loss, either for oneself or for third parties, in operations or transactions with publicly offered securities.

It is also important to emphasize that the reporting of information on the

The Company's financial statements, as well as false declarations before the CMF, as well as falsely misrepresenting publicly offered securities, are also criminal offenses.

### 12.3. Civil penalties (compensation for damages).

Violations of the LMV may give rise to civil liability on the part of the violator. Such civil liability translates into the obligation to indemnify the damages of whoever may have been affected by the infraction. Typically, such affected parties may be the company issuing the publicly offered securities, its directors and main executives, its shareholders and the contractual counterparties of the infringer in the act constituting the infringement.

## 13. Dispute Resolution in relation to this Manual.

Any doubt or difficulty regarding the application, interpretation and/or compliance with the Manual shall be brought to the attention of the Chief Executive Officer, who shall raise it with the Board of Directors of Viña Concha y Toro S.A. for a decision to be made at the next ordinary meeting.

## 14. Validity:

The present version of the Manual replaces in all its parts the previous Manual, approved at a direct session of the Board of Directors.

The Manual shall become effective as of September 1, 2021. As of said date, this Manual shall be understood to be known by all those to whom its contents may be applicable. The validity of the Manual shall be indefinite and its content may only be modified or terminated by agreement of the Board of Directors.

## Annex N°1

### Required Information on Securities Transactions

Name of Reporting Person: [\_\_\_\_\_] RUT of  
the Reporting Person: [\_\_\_\_\_]

#### 1. Identification of the person who carried out the operation.

1.1 RUT:  
[\_\_\_\_\_] (it is necessary to indicate the RUT of the  
person including its verification digit).

1.2 Name and Surname or Company Name:  
[\_\_\_\_\_] (must indicate the full name of the  
subject in the case of a natural person or the company  
name in the case of a legal entity).

1.3 Relationship with Viña Concha y Toro S.A.:  
[\_\_\_\_\_] (must inform the relationship of the  
subject that carried out the operation with Viña Concha  
y Toro S.A.).

#### 2. Transaction data.

2.1 Date of the transaction:  
[\_\_\_\_\_] (must inform the day, month and year  
in which the transaction took place).

2.2 Date of communication of the transaction:  
[\_\_\_\_\_] (the day, month and year in which the  
transaction was informed to Viña Concha y Toro S.A.  
must be indicated).

2.3 Type of transaction:  
[\_\_\_\_\_] (must inform the type of transaction  
carried out, such as, purchase and sale of securities,  
subscription of shares of a new issue, acquisition or  
disposal of securities by dation in payment, donation or  
any other act by means of which the ownership of  
securities is acquired or transferred).

2.4 Type of value:  
[\_\_\_\_\_] (the type of security traded must be  
indicated).

2.5 Transaction carried out on shares of the open  
stock corporation that gives rise to the obligation  
to form:  
[\_\_\_\_\_] (must indicate whether the transaction  
was carried out on shares of the company or is a  
transaction on another security).

2.6 Instrument identification:  
[\_\_\_\_\_] (in case the security is listed on stock  
exchanges or has a mnemonic or other code that allows  
its identification).

a) Series:  
[\_\_\_\_\_] (must indicate the series of the  
instrument subject of the transaction, if applicable).

b) Number of units traded:  
[\_\_\_\_\_] (must report the number of nominal  
units traded).

c) Unit price:  
[\_\_\_\_\_] (it corresponds to indicate the unit price  
or rate, weighted average, at which the transaction was  
made).

d) Total amount of the transaction:  
[\_\_\_\_\_] (you must report the total amount in  
pesos of the transaction).

2.7 Final percentage obtained after the operation:  
[\_\_\_\_\_] (it corresponds to inform the approximate  
percentage that represents the participation of the person  
who carried out the transaction in the capital of the  
company or entity, in the case of transactions on shares or  
capital instruments).



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