

CODE OF ETHICS AND CONDUCT EMPRESAS SUTIL S.A. Y FILIALES



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I. OBJECTIVE

The purpose of this Code of Ethics is to establish, define and publicize the values, ethical principles and conduct guidelines that guide the actions, relationships and decisions of Empresas Sutil and its subsidiaries (hereinafter Empresas Sutil) and their collaborators and that they are strictly complied with in the exercise of their functions both within the company's facilities and in the activities that are carried out outside of it.

Empresas Sutil recognizes that the sum of individual and collective ethical conduct contributes to the construction of the image and distinction of Empresas Sutil as a company of integrity and reliability.

This document represents the commitment of Empresas Sutil with ethical behavior in its labor and commercial relations and, in general, in all actions in which any of the companies of the Group and its collaborators intervene, as it recognizes business ethics as a fundamental pillar for its sustainable development in the environments and markets in which it operates.

II. SCOPE

This Code of Ethics is applicable and mandatory for all personnel who carry out permanent or temporary activities at Empresas Sutil S.A. and its subsidiaries, including Coagra S.A., Coagra Agroindustrial S.A., Banagro S.A, Pacific Nut Company Chile S.A., Frutícola Olmué SpA, Champiñones Abrantes S.A., Agrícola Sutil S.A. and subsidiaries, Top Wine Group S.A. and subsidiary and Hotel Viña La Playa (hereinafter, Empresas Sutil); because all the members of the company's Board of Directors, Managers, Headquarters and Workers, as well as any individual or organization acting on behalf of Empresas Sutil and any of its subsidiaries, have the duty to guide their conduct with the standards of this Code.

It is the responsibility of each of them to know and fully comply with the provisions of this document, leaving the signed commitment letter as proof of this. Also, it will be ensured that the clients, producers, suppliers, contractors, advisors and consultants of the organization know and share the ethical principles of this Code.

It tends to always act for the benefit of the organization, complying with all applicable laws, regulations, codes and procedures, characterized by respect in all interactions and transparency in all decisions.

Empresas Sutil is not interested in achieving results through the use of bad practices or at the expense of the integrity of its employees.



III. MISSION, VISION AND VALUES

Our mission:

Contribute to the quality of life of our consumers, clients, producers and collaborators, developing companies of excellence in the agri-food industry, sustainable, that contribute to the growth of the country.

Our vision:

To be Leaders in the sustainable development of Agribusiness.



Our values:

Recognize that success depends on the ability to decide, act and interact in a manner consistent with the values established by Empresas Sutil.

COMMITMENT

We make the objectives of the organization our own.
We work as a team to achieve these goals.
We celebrate our successes together.

RESPONSIBILITY

We do the job well at once, taking care of the details and ensuring results.
We anticipate and assume the consequences of our actions and decisions.
We are aware that we are part of an environment and we consider it in our actions.
We comply with what we must comply with (rules, laws, regulations, policies, procedures).

TRANSPARENCY

We openly and clearly communicate our intentions, ideas and actions.
We share truthful information.

I RESPECT

We value every person with whom we interact.
Cordiality, assertiveness and diligence are a sign of our respect for people.
In our relations, frank and constructive dialogue prevails.



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At Empresas Sutil and its subsidiaries (hereinafter, Empresas Sutil), priority is given to caring for its workers, its image and how its assets are used responsibly, establishing a good place to work, where employees feel dignified, safe and comfortable. As a relevant part of its focus is social responsibility, leading the agri-food operation through a responsible and sustainable relationship with the environment and the local community.

IV. CONDUCT GUIDELINES

A. Work Environment

Empresas Sutil is an employer committed to equal opportunities. Reject any form of illegal work or under hostile conditions. The work environment is characterized by cordiality, respect, fair and inclusive treatment, where we all commit to:



- Promote and maintain a healthy coexistence.
- The right of every collaborator to associate freely is recognized, respecting current legislation and complying with the obligations arising from the position. Likewise, the company agrees with the permanent dialogue, the development of bonds of trust and healthy relations with union organizations.
- Protect the dignity of our co-workers and respect individual, cultural, gender, ethnicity, religion, political ideology, age, opinion or other differences, as well as their privacy.
- Ensure equal employment opportunities both within the company and in the selection of personnel with the ideal skills for the positions, and who share and honor the ethical values of the company.
- Ensure and promote objectivity in the delivery of benefits and recognition to employees; that are based on merit.
- Honor the rights of collaborators and the commitments agreed upon with them at all times.
- Obtain and treat the personal data of collaborators responsibly, ethically and in accordance with applicable privacy laws.



- Do not allow, and report all types of discrimination, harassment or physical or emotional aggression, workplace or sexual harassment, inside and outside the workplace.
- Do not allow under any circumstances the work of minors in any of the company's operations.
- Do not allow any discrimination that is not based on personal ability and suitability

B. Safety at Work

Empresas Sutil cares for the safety of its employees and complies with current regulations in all its operations. The company is interested in achieving its results by basing its actions on good practices, caring for the integrity of its collaborators, to whom the responsibility of caring for safety in their work environment and that of their colleagues is extended, to each one of their collaborators, who undertake to:



- Identify and timely alert security risks that may arise in daily activities.
- Know, comply with and enforce the fundamental safety regulations.
- Demand that the required personal protection elements be provided.
- Maintain and execute the risk prevention plans, prepared by the prevention specialists of each subsidiary.
- Carry the required protection elements and follow the indicated procedures.



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- Do not allow a colleague, boss or subordinate to expose their physical integrity.
- Do not take shortcuts in procedures that may expose your physical integrity or that of your colleagues.
- Refrain from carrying out activities for which they are not trained and qualified and that may imply a security risk.

C. Commitment to the Company

Empresas Sutil requires the commitment of its collaborators to execute its mission and achieve its objectives. In the same way that Empresas Sutil honors the commitments acquired with its collaborators, it expects them to fully comply with the duties, obligations and prohibitions established in laws and regulatory norms, in this code of ethics, the internal regulations of order, hygiene and security:



- Execute the functions and responsibilities entrusted fully, making efficient use of service time.
- Make transparent the errors that are committed in the course of work activities, declaring them in a timely manner, through the established means, direct leadership, managers and/or complaint channel platform.
- Be characterized by upright and respectful behavior inside and outside the company where you are acting on its behalf.



- Do not develop any external activity that may affect your capacity and availability with the obligations with the company (for example, alcohol consumption, drugs).
- Do not expose the organization with acts or behavior at odds with good customs and healthy coexistence.

D. Protection of the Company

The protection of the company begins with the self-care of all workers, therefore, each one of the employees of Empresas Sutil who is in their personal charge, has the responsibility of their care and protection, always seeking to comply with it.

Likewise, the personnel who are responsible for the use or administration of different company assets (property, money, information, etc.) have the responsibility to protect these resources against loss, theft, damage, waste or improper use.

The individual behavior of our collaborators contributes to the construction of the image of Empresas Sutil as an integrated and reliable company. This is why behavior consistent with the values that characterize us is expected of each one, in accordance with the responsibilities of their position and safeguarding the good name of the company.

Finally, tending to protect its image and assets, Empresas Sutil does not accept any act or omission that could generate legal or regulatory breaches, any type of sanction or that exposes the good name and reputation of the company. Each of the employees of Empresas Sutil commits to:



- Respect your collaborators in charge, having a fair and equitable treatment and taking care of their personal protection.
- Safeguard confidential or proprietary company information from unauthorized use.
- Protect the company's intellectual property (copyrights, trademarks, patents, design rights, logos, etc.).
- Take care that the reports and records that they generate in their obligations are always a true reflection of reality; those that are owned by the company and therefore the information contained in them must be kept confidential.

Carry out all the entrusted activities in strict compliance with applicable laws and regulations.

- We make responsible use of company resources.



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- Respect compliance with current legal regulations regarding unemployment insurance benefits in exceptional circumstances.
- Respect the health and safety provisions issued by the health authority in the event of an epidemic or pandemic.



- Do not disclose or use photographs or videos of plants, productive tasks, or other aspects that affect both the privacy of our workers and the physical and intellectual property of Empresas Sutil.
- Do not use the name or the resources of Empresas Sutil for personal benefit or that of a family member (cars, money, other assets).
- Do not exceed the powers of signature, money management and password use, outside the purposes for which they were delivered.
- Avoid all contact and refrain from interacting with dishonest people who may harm Empresas Sutil.
- Do not violate the intellectual property of third parties (software, brands, logos, etc.).
- Refrain from making comments (whether at family or social gatherings or on social networks) that are detrimental to Empresas Sutil or those who are part of it.

E. Conflicts of Interest

Empresas Sutil is a transparent company. The decisions of its collaborators obey objective criteria and not personal or third-party interests, avoiding any activity or interest that could threaten our own personal integrity or the good name of the company.

Conflicts of interest occur to those who, having an obligation to Empresas Sutil, have a relationship with any person or organization that competes or does business with the company, or participates in activities that may affect their judgment in the fulfillment of their responsibilities or hinder their decisions. for their own benefit or that of third parties such as family or friends.

The Conflicts of Interest Policy details specific situations of conflicts of interest that may arise in practice, as well as how to proceed with them. Notwithstanding this, below are some illustrative examples:



- The acceptance of money or payments from third parties, within the framework of the performance of the functions of the collaborator.
- The acceptance of gifts that are not authorized in accordance with the Gift policy.
- Have a job or be employed by another public or private institution or company, which may influence or generate conflict with the responsibilities of the collaborator or with the interests of Empresas Sutil. Hiring direct relatives, close friends or people with whom you have a significant relationship of affection.
- Having a personal interest or benefit outside the welfare of the business, with the business of a supplier, consultant, competitor or client.
- Act as a partner, advisor, employee, executive or director of a supplier, competitor, institution or public body, or client that is related to Empresas Sutil.
- Act on behalf of the company in any transaction or contract with related persons.

There may also be conflicts of interest due to kinship or close friendship between two collaborators or between an applicant for Empresas Sutil and a collaborator, in the following cases:

- When there is direct supervision or in the same line, of a relative or close friend with respect to the other.
- When, due to the characteristics of a person's position, they handle sensitive or confidential information that affects the management of their relative or close friend.



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- When a person's decisions must be received, processed or approved by their relative or close friend.
- When one of the people works in an area that is responsible for auditing the management of the area of their relative or close friend.
- In general, when the objective judgment of one or both is or may be affected by the relationship of family or friendship at the time of making a decision or resolving a matter in the best interest of the company and not in their own or that of others. your relative or close friend.

In this matter, all the employees of Empresas Sutil undertake to:



- Identify and refrain from situations where personal interests or those of a family member or third party may reduce objectivity in the fulfillment of their responsibilities.
- Promptly report conflicts of interest so that the necessary precautions are taken.



- Refrain from making decisions on behalf of the company when in the presence of a potential conflict of interest.
- Refrain from getting involved in activities such as investments, jobs or other relationships that may create a conflict of interest with your responsibilities with Empresas Sutil.
- Do not disclose or use for personal benefit or that of a third party, information related to processes, methods, strategies, plans, projects, technical, market or any other type of data.

However, the communication of this situation must be done through the Annual Declaration of Conflict of Interest, a survey applied by the companies at least once a year, or through the means provided for such purposes.

F. Relationship with the Community and the Environment

Through its operations, Empresas Sutil seeks to: (i) sustainably develop its raw materials with traceability and product quality in accordance with maximum food safety and sustainability standards; (ii) exercise good agricultural practices in their own fruit production, being responsible with the environment, water resources, and the collaborators who carry out agricultural work; (iii) management of agro-industrial plants with continuous improvement of the sustainable footprint per kilo produced; and (iv) a duty of responsibility towards the local community that has a direct impact on business work. In this sense, its collaborators undertake in the exercise of their functions to:



- Comply at all times with applicable environmental laws and regulations.
- Use natural resources responsibly and economically.
- Identify and timely solve situations that are causing damage to the environment or harm to the community, maintaining a relationship of dialogue and respect with the community at all times.



- Never make an investment, management or change decision without taking the social and environmental considerations that ensure that the impacts of our company are positive for the ecosystem and society.

V. FREE COMPETITION PRACTICES

A. Relations with the Competition

Empresas Sutil competes in the market honestly with respect and responsibility, observing compliance with laws, regulations, codes and procedures.



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According to DL 211, any fact, act or convention that prevents, restricts or hinders free competition, or that tends to produce such effects, is considered an attack against free competition.

Attacks against free competition can be broadly divided into two categories: agreements between agents in the market (horizontal agreements between competitors and vertical agreements between, for example, suppliers and distributors) and unilateral acts (abuse of a dominant position and unfair competition).

HORIZONTAL AGREEMENTS: Horizontal agreements or concerted practices are behaviors developed jointly or coordinated between competitors that fall on any relevant competitive variable, reducing the competitive tension that should exist between them, by way of replacing the uncertainty of competition, by the greater certainty that collaboration gives. Examples of such behaviors are agreements between competitors whose purpose is to fix sale or purchase prices, limit production or allocate areas or market shares.

VERTICAL AGREEMENTS AND UNILATERAL CONDUCT: Agreements or practices between Empresas Sutil S.A. and Subsidiaries and a customer or supplier (vertical practices) may restrict competition if they have a significant effect on the competitive position of other competitors or suppliers.

Abuses of dominant position are behaviors developed unilaterally by a company with a certain predominant market position, which imply harm to its suppliers, competitors, customers and/or consumers (directly or indirectly). Abuses of dominant position can also be carried out jointly by competitors in a market.

UNFAIR COMPETITION: Acts of unfair competition are also prohibited in the rules of free competition, to the extent that such acts are executed with the aim of achieving, maintaining or increasing a dominant position. In general terms, any behavior contrary to honest uses in industrial or commercial matters constitutes an act of unfair competition. The following are deemed illegal, among others:



- Acts capable of creating confusion in the client, by any means, regarding the company itself, the ownership of its products, the products offered by the company, or the industrial or commercial activity of a competitor;
- false statements, in the course of business, capable of discrediting the products or the industrial or commercial activity of a competitor; and
- The indications or assertions whose use, in the exercise of commerce, could mislead the public about the nature, the manufacturing method, the characteristics, or the suitability of a competitor.

In particular, within the matters regulated by the rules of unfair competition are, among others, those of misleading advertising; general acts of deception; malicious discrediting of competitors; interference in third party contracts; exploitation of another's reputation; registration and malicious use of trademarks in order to hinder the entry of competitors; and, abusive interposition of jurisdictional actions.

All our collaborators commit to:



- Compete in a fair, honest and appropriate manner, refraining from improperly obtaining information from the competition.
- Limit interaction with competitors to scenarios such as forums and trade union meetings that are open and public and where issues that could generate risks for the company of non-compliance with free competition laws are not discussed.



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- Do not carry out exchanges of competitively sensitive information between competitors.
- Not participate in any price agreement, divide markets or customers, agree to participate in tenders, make exclusivity agreements with customers, suppliers or distributors or impose predatory prices in the market or any conduct that may limit the free play of the forces of markets in which Empresas Sutil operates.

B. Customer Relations

The relationships of Empresas Sutil with its clients are based on good attention, the delivery of quality products and services and with the required opportunity. We do business with clear and transparent rules; We use our customers' information responsibly and do not give or receive illegitimate benefits in exchange for achieving business goals. All our collaborators commit to:



- Serve customers by offering them a professional, transparent, fair and honest treatment in each transaction.
- Deliver products that meet hygiene, safety and quality assurance standards, including proper packaging and distribution.
- Pay attention and efficient solution to the problems, doubts or complaints that customers may make for the products that are delivered.
- Treat all the information of current clients, as well as those who have ceased to be, in a confidential manner.
- Be attentive to alert signs of suspicious activities that can hide or simulate a crime in the commercial relationship, such as: clients who carry out transactions of a high amount and do not have consistent activities that justify it, clients who in a short period of time appear as major new business owners.



- Do not make false or misleading comparisons with products or services equivalent to those offered by competitors.
- Do not unduly favor customers with direct or indirect economic benefits (unauthorized discounts, gifts, dinners), in order to expect to be favored in contracts or sales of any kind.
- Do not accept being favored with direct or indirect economic benefits from customers, in order to favor them in contracts or sales of any kind.
- Not receive personal gifts from any of our clients, be they objects, trips or acts of hospitality, which may influence their sanity and reduce the objectivity of the business relationship.
- Refrain from doing business with clients who could be involved in money laundering or terrorist financing crimes and promptly report the situation to superiors.
- Not carry out negotiations, actions, contracts, operations or management involving the company or any of its subsidiaries, when their interests may be affected (incompatible negotiations).

C. Relations with Suppliers, Producers and Other Third Parties

Empresas Sutil does business with suppliers, producers and other third parties (banks, customs agents, etc.) based on criteria of quality and timeliness of service. Relations are based on respect, transparency and equal opportunities. All our collaborators commit to:



- Demand and ensure quality and full compliance with the conditions and technical specifications agreed with suppliers, producers and other third parties. In the design of agreements or contracts with its suppliers, • Empresas Sutil S.A. and its Subsidiaries, always respects the rules of free competition and avoids any negotiation or clause that deviates from acceptable commercial uses.
- Make sure of the lawful origin of the products and services supplied.
- Select suppliers impartially, based on criteria of quality, experience, profitability and service.



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- Provide suppliers and producers with relevant information on contracts in a clear, truthful, equal and timely manner.
- Respect the commitments made with suppliers, producers or third parties.
- Treat all the information of the current suppliers, as well as those that have ceased to be, in a confidential manner.



- Not receive personal gifts from any of the suppliers, be they objects, trips or acts of hospitality, which may influence their sanity and reduce the objectivity of their selection.
- Do not select or exclude suppliers, producers or third parties, based on prejudice or personal benefit or that of a third party.
- Do not do business with suppliers, producers or third parties with business practices that go against the ethical values promoted by Empresas Sutil, or that could be involved in crimes such as money laundering or financing of terrorism, corruption between individuals (bribery associated with hiring). or others, reporting the situation immediately.
- Do not discuss with a supplier or with people outside the company, the problems or weaknesses observed in another supplier.

VI. COMPANY CRIME PREVENTION PRACTICES

A. Relations with Authorities and Public Officials

Empresas Sutil undertakes that, in all instances of interaction with authorities or public officials, respect, transparency and probity prevail. The company emphatically rejects any form of bribery or incitement to public officials or authorities to obtain any authorization or benefit in the course of its business activities, offering an economic or other benefit. The employees of Empresas Sutil commit to:



- Limit contact with public officials and authorities to what is strictly required, in normal and public places where they perform their duties.
- Collaborate at all times with the competent authorities in the exercise of their functions, offer friendly and respectful treatment and respond promptly to their requirements and observations, within the powers granted by laws or regulations.



- Do not attempt to streamline procedures or obtain authorizations illegitimately.
- Do not take advantage of instances with authorities or public officials to obtain privileged or unfair conditions.
- In no case by himself or through an intermediary may he offer, promise, grant or agree to give objects of value, benefits or money to a public official in Chile or abroad.

B. Money Laundering, Financing of Terrorism and Reception.

Empresas Sutil undertakes that each transaction held with its suppliers and customers will always take care of the origin of the money involved in the business obtained. Therefore, in the exercise of their functions, our workers undertake to:



- Take care that the money or assets of the company or the execution of contracts, in no case are used for money laundering, financing of terrorism or other illegal purposes and/or constituting crimes.
- Report any suspicious situation in this matter, through the channels that Empresas Sutil and its subsidiaries have designated for these purposes.



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C. Negotiations and influence peddling

As with conflicts of interest, Empresas Sutil declares that it is a transparent company, where business decisions are taken into account based on objective criteria and not on personal or third-party interests, avoiding any activity or interest that could harm of their personal integrity or the good name of the company, including the abuse of the functions attributed to their positions.

In this matter, all the employees of Empresas Sutil undertake to:

-  • Identify and refrain from situations where personal interests or those of a family member or third party may reduce objectivity in the fulfillment of their responsibilities.
- Promptly report conflicts of interest so that the necessary precautions are taken.
-  • Refrain from making decisions on behalf of the company when in the presence of a potential conflict of interest.
- Refrain from getting involved in activities such as investments, jobs or other relationships that may create a conflict of interest with your responsibilities with Empresas Sutil.
- Do not disclose or use for personal benefit or that of a third party, information related to processes, methods, strategies, plans, projects, technical, market or any other type of data.

D. Protection of the Company's Patrimony.

The Executives and Representatives of Empresas Sutil declare themselves responsible for managing, protecting and safeguarding the assets of Empresas Sutil S.A. and its Subsidiaries, in accordance with the ethical and value guidelines provided by this code. Therefore, they individually commit to:

-  • Refrain from entering into contracts on behalf of the company with excessive prices that could in the long run damage its assets, obtaining in exchange a personal benefit from said transaction.
- No self-loans, whatever the purpose of said transaction.
- Refrain from using company funds for personal purposes, with the intention of returning them.
- Refrain from carrying out actions or omissions contrary to the assets of the company.
- Refrain from committing fraud in the use of unemployment insurance benefits, in exceptional circumstances.
- Refrain from instructing or forcing our workers to violate the measures issued by the health authority in the event of an epidemic or pandemic.

VII. ADMINISTRATION OF THE CODE OF ETHICS AND CONDUCT

The company's Board of Directors has delegated to the Audit Committee the task of ensuring compliance with this code, including the responsibilities of:

- Together with management, promote the values and behaviors defined in this Code and establish the necessary procedures for the promotion, dissemination and compliance with ethical conduct.
- Being a consultative and supervisory body regarding compliance with this Code, addressing, if any, doubts regarding a specific situation or conduct.
- Resolve and sanction, if applicable, situations of non-compliance with this code, as well as with laws, regulations, policies, procedures and other internal and external rules applicable to Empresas Sutil.
- Resolve the conflicts that the application of the Code could raise
- Update and suggest modifications to the Code of Ethics and Conduct.



VIII. COMPLAINTS CHANNEL

Empresas Sutil makes available to any collaborator or external person related to the Company a complaint channel platform, in which with all comfort and absolute reservation they can make their complaints regarding any irregular or illegal activity or act, which implies a violation to our values, ethical conduct, conflict of interest, and any breach of current laws, regulations or regulations, as well as internal rules and policies.

People who become aware of the existence of an irregular situation must report it through the following means:

Web:

<https://empresassutil.eticaenlinea.cl/>

The complainant may choose to remain anonymous at the time of filing their complaint. In any case, all situations brought to our attention will be treated with complete confidentiality and the protection of the complainant will be guaranteed at all times.

For more information, consult the Sutil Companies Complaints Procedure

IX. GIFTS POLICY

Empresas Sutil believes that any act of giving or receiving gifts, hospitality, invitations to entertainment, meals or other similar things can cause and expose our collaborators to an eventual conflict of interest, which is why the Gift Policy for delivery and reception is established. of gifts or other types of royalties or gifts, directly or indirectly for the purpose of regulating possible cases, situations, practices or questionable behaviors that do not comply with the provisions of this code of ethics and conduct, regulations, policies, procedures and internal regulations, or applicable external laws, codes and regulations, that expose the companies to public questioning or that affect their independence.

Gifts may be received, provided that they do not exceed a commercial value of two Unidades de Fomento (2 UF) and are exclusively of an advertising nature (meaning those that have printed corporate advertising). Under no circumstances may these be in cash or its equivalent.

Illegitimate actions are exposed to being sanctioned within the company, as well as to being reported to the competent authorities where they can be sanctioned under the regulations contemplated in the legal framework.

In the cases in which you observe that a collaborator, manager, director fails to comply with this policy, you have the duty and responsibility to report it, for which the company has made a reporting channel available to you. In the same way, in cases of doubt, you can use this same means or approach the general manager of your organization.

X. DISCIPLINARY MEASURES

Failure to comply with this Code may cause detriment and serious consequences for Empresas Sutil. Reason for which, any action that means an infraction, will be duly analyzed with impartiality and transparency by the Audit Committee, an entity that may impose any of the following sanctions:



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- a) Verbal Warning
- b) Written Warning
- c) Penalty
- d) Termination of the employment relationship
- e) Exercise of civil and criminal actions against the offender.

In the event that the breach represents the commission of a crime punishable by the Public Ministry or other competent administrative or judicial authorities, Empresas Sutil will provide all the necessary collaboration required to prosecute and punish the crimes committed.

XI. VALIDITY AND MODIFICATIONS

The Code of Ethics and Conduct of Empresas Sutil has been modified, according to the following detail:

DATE	REASON/SUPPORT	RESPONSIBLE
22/08/2016	Approval of Board of Directors	Directory of Empresas Sutil
01/09/2016	Entry into force	Comptroller Manager
30/05/2019	Incorporation of crimes, according to Law 21.121 – Law 21.132	Audit Manager
30/06/2020	Incorporation of crimes, according to Law 21.127 – Law 21.240	Audit Manager
01/12/2020	Incorporation of Sustainability considerations	Audit Manager
12/05/2021	Incorporation of vineyard La Playa Hotel Subsidiary	Audit Manager

