

INTEGRITY PROGRAM	TREATMENT OF INFORMATION POLICY	PIN_PTI_ML.
		Rev. 01
		Date of approval: 08/30/2017
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TREATMENT OF INFORMATION POLICY

3 MAIN POINTS

1º

OBJECTIVE: Ensure security, authenticity, availability, integrity and relevance of Magazine Luiza information which shall be classified as Secret, Confidential and for Internal Use, when necessary

COVERAGE: Managers, employees, shareholders and partners of Magazine Luiza.

COMMITMENT: Executive officers, functional area officers and managers shall sign the Commitment Statement of Confidentiality and Secrecy available at the Luiza Portal.

2º

GUIDELINES ON CAUTIOUS ABOUT INFORMATION

WORKPLACE AND SOCIAL NETWORKS

Restrict information only to the persons and areas requiring this information to perform their activities. Magazine Luiza (ML)'s **data only shall be shared by the areas in charge thereof.**

EXTERNAL ENVIRONMENT

ML information only can be published after authorization of the **Chief Executive Officer** and, after assessment of the Reputation Management. **ML information shall never be shared with relatives and friends.**

EXTERNAL EVENTS AND PUBLICATIONS

When representing Magazine Luiza in events, lectures, in any external environment and/or when preparing works, **not mention ML information without previous authorization.**

RELEVANT INFORMATION TO THE MARKET

Not trade Magazine Luiza's securities or of company involved with ML while possessing essential information not yet publicly disclosed to the market. **ML data cannot be used to own benefit or of third parties.**

3º

INFRINGEMENTS AND PENALTIES

- The **leakage of information**, even if unintentional, **is a serious fault.**
- **Punishments:** from verbal warning to **termination for cause;** where applicable, adoption of legal process, **civil and/or criminal proceedings**, with request for **remedy of damages.**
- In case of breach of law, **Magazine Luiza will fully cooperate with appropriate authorities, to ensure that violators are punished.**

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1 – Control of changes

Revision	Date	Place of Revision	Description
0		-	Initial issue

Distribution List

Duty
Managers and employees of Magazine Luiza

Training List

Duty
Managers and employees of Magazine Luiza

Prepared/Revised by:

Integrity Executive Board

Approved by:

Chief Executive Officer

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1. OBJECTIVE

Set forth criteria for the treatment and use of information/data produced, shared and stored by employees and partners of Magazine Luiza.

2. TERMS AND DEFINITIONS

- **Authenticity:** quality of information which has been produced or altered;
- **Availability:** quality of information which may be known and used;
- **Document:** unit of record of information;
- **Information:** data, processed or not, which may be used for production and conveyance of knowledge;
- **Relevant/Essential Information:** that information considered relevant by investors and other market agents, in the decision-making process to buy or sell the Company's shares.
- **Personal information:** that information referring to the person identified or identifiable;
- **Integrity:** quality of non-modified information;
- **Relevance:** quality of information collected in the source, with maximum detail as possible, without changes.

3. DUTIES AND RESPONSIBILITIES

CEO	Investor Relations Officer	Executive Board and Areas Executive Boards	Reputation Corporate Management	Managers and other leaders	Analysts and other employees
Define and approve the strategy of disclosing sensitive information, set forth guidelines to classify confidential information and authorize the disclosure of Magazine Luiza information.	Disclose essential and relevant information to the market pursuant to Articles 3 and 6, Sole Paragraph of Normative Instruction No. 385/2002 of CVM.	Make employees and leaders aware of proper care necessary when dealing with information in accordance with this policy.	Assess the authenticity, the integrity, the reputational impacts of disclosure of information, advise and align with CEO the information which may be publicly known.	Assess and classify the confidential or essential information, and treat it likewise when communicating with subordinates, the Executive Board, making subordinates to observe this policy criteria.	Assess and classify the confidential or essential information, and treat it likewise when communicating with peers, leaders, and observe the criteria set forth herein.

Note 1: Where applicable, refer any confidential or essential information for assessment of the Reputation Corporate Management.

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4. GUIDELINES ON CAUTIOUS ABOUT INFORMATION

The information produced, shared and/or stored by Magazine Luiza is a valuable asset and each employee's conduct is essential for its protection. Information may be present in several forms, such as information systems, databank, press media, electronic devices, portable device, handwritten notes and even by means of verbal communication.

4.1 Classification of Information

- I. **Internal Use:** all the information produced by Magazine Luiza aiming at guiding and/or subsidizing the conduction of businesses and activities of the Company;
- II. **Confidential:** All information on financial, accounting or managerial data referring to Magazine Luiza's performance and results (before its official publication), technical reports, agreements and other information related to Magazine Luiza, business partners and suppliers with restricted access due to legal, contractual order, commercial agreement, technical cooperation agreement, amongst others.
- III. **Secret:** All the information about strategic plans, development of products and/or services, advertising campaigns, market trades, merger, acquisition, incorporations. The access, disclosure, and treatment of confidential information will be restricted to the persons needing to be aware thereof, always connected with the commitment to maintain its confidentiality, pursuant to the Statement of Confidentiality and Secrecy of Information of Magazine Luiza, Exhibit I.

Note 1: The classification shall be made when information and data are generated, or, subsequently, whenever necessary.

Note 2: If the document contains information classified into different types, the confidential treatment shall be given to the document, ensuring access only after CEO's approval.

4.2 Guidelines on Cautious about Information:

- I. Magazine Luiza's proprietary information shall be protected from risks and threats that may compromise the confidentiality, secrecy, integrity or availability thereof.
- II. Sharing of information, even if within the scope of Magazine Luiza, shall occur only with those who need to be aware thereof.
- III. Managers and employees shall neither manipulate nor use data on Magazine Luiza's activities which may influence decisions to their own benefit or prejudice of third parties, under the penalty of civil or criminal liability.
- IV. Information classified as strategic shall receive confidential treatment, which only can be disclosed with the authorization of the chief executive officer or in case of a legal requirement or court decision.
- V. Employees, even if no longer working at Magazine Luiza, cannot use for private purposes, nor convey to third parties, any information pertaining to Magazine Luiza, even if obtained or developed by themselves, being subject to reasonable penalties.

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4.3 Workplace, Internet, and social networks

It is necessary to observe the workplace before speaking/dealing with relevant issues and/or information sensitive to the Company, being important to:

- avoid disclosure of sensitive information in open environments, only the area in charge of production of information or with attribution to deal with the matter may disclose and discuss it internally;
- observe in electronic, printed documents, cautious when sharing (email addresses and safekeeping of printed documents);
- protect passwords and accesses to Magazine Luiza's electronic systems, its shared use is strongly forbidden.
- the use of IT resources shall be restricted to work-related issues, and at any time, may be audited by Magazine Luiza.
- in social networks the issue of opinions on behalf of Magazine Luiza, the sharing of sensitive information shall not occur, as well as offensive language to our brands, we recommend the same criteria for business partners and work staff

4.4 External Environment

In public sites, such as restaurants, airports, lifts and taxis, personal residence or with relatives/friends, employees shall avoid discussing issues related to Magazine Luiza, when unavoidable, keep voice down, omit figures and other relevant data. Bear in mind that:

- only the area which has the duty of dealing with the matter purpose of information may disclose data, issue notices, express opinion on this information.
- information and data of Magazine Luiza only may be disclosed/published after previous authorization of the Chief Executive Officer and after assessment of the Reputation Corporate Management.

4.5 Participation in events and external studies

When representing Magazine Luiza in events, lectures, work groups, and/or external studies, in private and/or public institutions, and other environments, employees shall not mention Magazine Luiza's information, without the previous authorization of the Chief Executive Officer. The following issues shall be observed:

- never disclose strategies and/or information on the Company's business nor issue opinions on matters not pertaining to their area of activity, restricting their competencies and duties inside the organization.
- Under no circumstance, employees may use examples or mention situations, which directly or indirectly expose Magazine Luiza or reveal risks, results or strategy on a certain matter.

4.6 Relevant Information to the Market

Magazine Luiza complies with prevailing laws and has internal policies which determine the guidelines referring to the disclosure of essential information which has not been

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publicly disclosed yet. The information is considered essential when an investor considers it relevant to his decision to buy or sell the Company's shares, with a substantial revision up or down in profit forecasts; a significant restructuring at the Company; a relevant change in Management; an important acquisition or withdrawal of investments; the opening of new points-of-sale or the renewal of current points-of-sale, among others provided for in prevailing laws.

Managers and employees cannot:

- trade Magazine Luiza's securities nor securities of any company involved with Magazine Luiza while they possess essential information and not yet publicly disclosed about Magazine Luiza and referred company.
- disclose essential information and not yet publicly disclosed on Magazine Luiza or another company to nobody out of the Company, including relatives.

5. GENERAL GUIDELINES

5.1 Applicability

This Policy shall unrestrictedly apply to all managers, employees, shareholders, and partners of Magazine Luiza.

5.2 Commitment to Confidentiality and Secrecy

All managers and employees shall read and understand the guidelines and rules set forth herein. The Company's executive officers, functional area officers, and managers shall sign the "Commitment Statement of Confidentiality and Secrecy" (Exhibit I) available at the Luiza Portal.

5.3 Effectiveness and Approval

This Policy shall be effective as of the date of its approval and disclosure and may be revised whenever necessary.

5. Consequences of Breaches Policy

The leakage of information, even if unintentional, is a serious fault. In the event of leakage of information, Magazine Luiza will adopt disciplinary measures, which may be from a verbal warning to termination for cause, not excluding, when reasonable, the adoption of legal process, by means of civil and/or criminal proceedings.

Infringements	Penalties*
Unintentional leakage of information/data of internal use	Verbal warning (recidivism – formal)

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Intentional leakage of information/data of internal use	Formal warning (recidivism – termination)
Unintentional leakage of information/confidential data, due to contractual requirement.	Formal warning and remedy of any damage caused.
Intentional leakage of information/confidential data, due to contractual requirement.	Dismissal and remedy of any damage caused.
Unintentional leakage of information/confidential data, due to legal requirement.	Dismissal, adoption of reasonable legal process and remedy of eventual damage.
Intentional leakage of information/confidential data, due to legal requirement.	Termination for cause, adoption of reasonable legal process and remedy of eventual damage.
Unintentional leakage of information/confidential data	Dismissal and remedy of eventual damage. Criminal lawsuit: infringement of Paragraph 1, Article 153, Decree Law No. 2.848/40).
Intentional leakage of information/confidential data.	Termination for cause and remedy of eventual damage. (Criminal lawsuit: infringement of Paragraph 1, Article 153, Decree Law No. 2.848/40).
Improper use of insider information.	Termination for cause, adoption of criminal lawsuit: infringement of Article 27-D of Law No. 6.385/76, introduced by Law No. 10.303/2001.
O ML will notify CVM as soon as it is aware of the fact.	

***Note: The consequences measures adopted by ML, whether internally or by means of the adoption of reasonable legal process shall apply after assessment of the seriousness of concrete case and the impacts caused by infringement.**

It shall be incumbent upon the Integrity area to verify the cases reported and submit them to the Integrity Committee, which in serious cases, shall ratify its decision at the Board of Directors.

6. REFERENCE

- Code of Ethics and Conduct; Anti-Corruption Manual; Integrity Manual, Policy of Disclosure and Trading of Securities (internal documents);
- Federal Law No. 6.385/76 providing for the securities market and creates the Brazilian Securities and Exchange Commission.
- Federal Law No. 6.404/76 providing for the corporations.

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- Normative Instruction of CVM No. 358/2002

7. EXHIBITS

Exhibit I – Commitment Statement of Confidentiality and Secrecy.

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7.1 COMMITMENT STATEMENT OF CONFIDENTIALITY AND SECRECY

I, (Name), (title) Exclude if electronic acceptance, declare I have read and understood the criteria defined in Magazine Luiza Treatment of Information Policy, and undertakes to:

- I. Protect from risks and threats all the information to which I have access due to the performance of my duties at Magazine Luiza which may compromise the company;
- II. Neither manipulate nor use data on Magazine Luiza's activities which may influence decisions on my behalf or trigger benefit or prejudice to third parties, under the penalty of civil and criminal liability;
- III. Treat all information classified as confidential, secret and essential/relevant with diligence to ensure that this information is maintained restricted to authorized persons;
- IV. Never comment on eventual leakage of confidential, essential/relevant and/or secret information, except if authorized by Chief Executive Officer in case of a legal requirement or court decision.
- V. Even after no longer working at Magazine Luiza, neither use for private purposes nor transfer to third parties, technologies, brands, methodologies and any information pertaining to Magazine Luiza, even if obtained or developed by myself and/or under my guidance, keeping total and absolute secrecy of all methods and operational routines, as well as commercial and tax procedures.

I also declare that I am aware that the leakage of this information may represent serious fault, subject to disciplinary measures, and even, legal process, whether at the civil and/or criminal level, and where applicable, the remedy of damages.