

|                   |   |                              |
|-------------------|---|------------------------------|
| INTEGRITY PROGRAM | GIFTS, GIVEAWAYS AND HOSPITALITY POLICY           | PIN_POL. 01_ML.              |
|                   |   | Rev. 01                      |
|                   |   | Date of approval: 12/13/2017 |
|                   | Security Classification: <b>Internal Document</b> | Page No.: 8                  |

## GIFTS, GIVEAWAYS AND HOSPITALITY POLICY

**OBJECTIVE** — Define criteria so that offer and/or receipt of gifts, giveaways and hospitality do not have purposes different from those to which they are concerned.

**COVERAGE** — All employees.

**LIMITS** — Gifts, giveaways and hospitality shall not exceed R\$ 500.00.



**HOW TO ACT** - If gift exceeds the limits defined and is not possible to return it, due to cultural or relationship issues, the item shall be sent to the Integrity Executive Board.

**PENALTIES** — if gifts and/or hospitality offered and/or received are considered irregular, the Integrity Committee will apply reasonable measures, and the violator's termination may initiate, observing the limits laid out by laws.

**DOUBTS** — These may be remedied with the Integrity Officer.

| GIFTS  | GIVEAWAYS   | HOSPITALITIES  |
|--|---|--|
| Any item with saleable value and without promotional characteristic.<br><br>Recurring gifts must be refused.   | Any item without saleable value aiming at promoting a brand, such as: commercial courtesy, containing offeror's logotype. | Hospitalities include, but not limited to accommodation, travel, trips, entertainment, tickets for sports and cultural events, amongst others. |
| <b>ATTENTION:</b><br>The offering of gifts, giveaways and hospitality for public servants and agents of any nature shall be avoided. In the assumption of offering, this only shall be allowed if it agrees with : (i) the limits established by Magazine Luiza and (ii) the rules of the Code of Ethics and Conduct to which public agent/servant is subject. |   |  |

|                          |   |                              |
|--------------------------|---|------------------------------|
| <b>INTEGRITY PROGRAM</b> | <b>GIFTS, GIVEAWAYS AND HOSPITALITY POLICY</b>    | <b>PIN_POL. 01_ML.</b>       |
|                          |   | Rev. 01                      |
|                          |   | Date of approval: 12/13/2017 |
|                          | Security Classification: <b>Internal Document</b> | Page No.: 8                  |

### Control of alterations

| Revision | Date | Place of Revision | Description   |
|----------|------|-------------------|---------------|
| 1        |      | -                 | Initial issue |

### Distribution List

| <b>DUTY</b>                 |
|-----------------------------|
| Board of Directors          |
| Board of Executive Officers |
| Integrity Executive Board   |
| Areas Officers              |
| Integrity Managers          |

### Prepared/Revised by:

Integrity Executive Board

### Approved by:

Board of Directors

|                   |   |                              |
|-------------------|---|------------------------------|
| INTEGRITY PROGRAM | GIFTS, GIVEAWAYS AND HOSPITALITY POLICY           | PIN_POL. 01_ML.              |
|                   |   | Rev. 01                      |
|                   |   | Date of approval: 12/13/2017 |
|                   | Security Classification: <b>Internal Document</b> | Page No.: 8                  |

## 1. OBJECTIVE

Set forth the guidelines for Magazine Luiza's employees referring to the offer and/or receipt of gifts, giveaways and hospitality, so that to ensure they are in conformity with Magazine Luiza rectitude principles.

## 2. TERMS AND DEFINITIONS

- **Gifts** – any item with negotiation saleable value.
- **Giveaways** – any item without saleable value referring to brand promotion.
- **Hospitality** – higher level of comfort or well-being of an individual or group of individuals. Hospitality include, but not limited to accommodation, travel, trip, entertainment, tickets for sports and cultural events, amongst others.

## 3. DUTIES AND RESPONSIBILITIES

| Integrity  | People Management   | Area Officer and Executives   | Employee  |
|--|---|---|---|
| Give adequate treatment to the offer or receipt of gifts or hospitality beyond the limits established herein, solve doubts referring to receipt and offer of gifts, giveaways and hospitality, give treatment to any issues related to fraud, bribery or corruption coupled with the offer or receipt of gifts and/or hospitality. | Define the destination of gifts, giveaways and hospitality which cannot be refused and submitted by employees of the benefited areas to be assessed by Integrity Executive Board. | Disseminate and apply this policy in their respective areas, assess the impacts of offering or receiving gifts, giveaways or hospitality, deciding jointly with Integrity Executive Board on the acceptance or refusal. | Report the receipt, refuse or send for assessment of the Integrity Executive Board gifts and/or hospitality received from any third party (individual or legal entity), request previous approval for the offering and/or receipt of gifts and/or hospitality for any third party, comply with and disseminate the guidelines set forth herein. |

|                   |   |                              |
|-------------------|---|------------------------------|
| INTEGRITY PROGRAM | GIFTS, GIVEAWAYS AND HOSPITALITY POLICY           | PIN_POL. 01_ML.              |
|                   |   | Rev. 01                      |
|                   |   | Date of approval: 12/13/2017 |
|                   | Security Classification: <b>Internal Document</b> | Page No.: 8                  |

## 4. GUIDELINES

Gifts, giveaways and hospitality may be offered and/or received only if they observe the following requirements:

- They are in conformity with all laws, regulations and corporate policies;
- They are offered or received: (1) to promote the brand, showcase or explanation on products and services; (2) in protocol events, such as, for instance, meetings with CEOs/senior management of large partners; (3) to comply with proven and relevant tradition for Magazine Luiza; (4) to celebrate special dates provenly relevant for Magazine Luiza; (5) in ceremonies or official corporate events<sup>1</sup>;
- These are offered or received in a transparent, not secret manner, without evidencing impropriety and not causing any constraint in case of public exposure for Magazine Luiza or its employees;
- These are offered and/or received without any expectation of reciprocity, obligation, or favor in return;

Under no circumstance gifts or hospitality may be offered and/or received in cash or like cash, such as gift voucher, loans, payment of daily rates, luxury items or vacation.

### 4.1 Specific Guidelines

#### Gifts involving individual and private entity

| Undue context  | Proper context   |
|--|--|
| Offer/receipt of gifts or hospitality from individuals or related parties is not accepted, such as: close relatives or other individuals, with whom Magazine Luiza maintains relationship. | Gifts and hospitality only may be offered or received on behalf of Magazine Luiza and to the benefit or deriving from legal entity, provided that in agreement with policies of the legal entity involved. |
| <b>Rules</b>   |  |

<sup>1</sup> The "official" characteristic of ceremony or corporate event presupposes the organization's previous understanding of the event, that is to say, at least, the Chairman of the Board, the Chief Executive Officer or an Executive Officer and Integrity Officer shall have previous knowledge on the corporate purpose and details of the event.

|                          |   |                              |
|--------------------------|---|------------------------------|
| <b>INTEGRITY PROGRAM</b> | <b>GIFTS, GIVEAWAYS AND HOSPITALITY POLICY</b>    | <b>PIN_POL. 01_ML.</b>       |
|                          |   | Rev. 01                      |
|                          |   | Date of approval: 12/13/2017 |
|                          | Security Classification: <b>Internal Document</b> | Page No.: 8                  |

|  |
|--|
| 1) Gifts and hospitality cannot exceed the unit amount of [R\$500.00], per legal entity, or legal entities controlled by same entity and shall not be frequent.  |
| 2) These cannot exceed the accumulated amount of [R\$1,000.00], [p.a.], per [legal entity or legal entities controlled by same entity].  |
| 3) Any receipt of gifts and/or hospitality offered or received shall be reported within [two (2)] business days as of receipt to [Integrity Executive Board] by employee who received and/or offered the gifts or hospitality.   |
| 4) If gift and/or hospitality can be refused, the refusal shall be formalized: [Exhibit A] - "Letter of Gifts and Hospitality Refusal".  |
| 5) If gifts and/or hospitality cannot be refused for any reason (ex: commercial or cultural) - the Integrity Executive Officer shall send the gift to the People Management Executive Board so that it can donate or raffle it among employees of Magazine Luiza. In case of hospitality, when it is not possible to apply the rule mentioned above, the Integrity Executive Board shall submit decision to the Chairman or Vice Chairman of the Board of Directors. |

### Gifts and hospitality involving public agents/servants and government entities

| <b>Undue context</b>   | <b>Proper context</b>   |
|--|---|
| The receipt/offer of gifts and hospitality from public servants is not allowed.<br>These shall be immediately rejected using the form [Exhibit A] - "Letter of Gifts and Hospitality Refusal".   | The offering of gifts, giveaways and hospitality to government entities shall only occur in protocol events and/or special and commemorative dates relevant for the culture of the country and/or Magazine Luiza, observing the limits set forth by laws to which the government entity is subject. |
| <b>Rules</b>   |   |
| 1) The offering of gifts, giveaways and hospitality to public servants/agents or parties related thereto (such as close relatives or related persons) shall be avoided. In protocol and festivity events may occur only in the assumption of being in accordance with the limits defined in the Code of Ethics and Conduct to which the public servant/agent is subject. |   |
| 2) Any offering of gifts, giveaways and hospitality by Magazine Luiza and/or its employees to public servants/agents and government entities shall be transparent to mischaracterize any aspect of undue or improper action.   |   |
| 3) Under no circumstance, gift and hospitality may be offered to public agents/servants with the duty of ruling, inspecting and/or render jurisdiction under Magazine Luiza activities.  |   |

|                          |   |                              |
|--------------------------|---|------------------------------|
| <b>INTEGRITY PROGRAM</b> | <b>GIFTS, GIVEAWAYS AND HOSPITALITY POLICY</b>    | <b>PIN_POL. 01_ML.</b>       |
|                          |   | Rev. 01                      |
|                          |   | Date of approval: 12/13/2017 |
|                          | Security Classification: <b>Internal Document</b> | Page No.: 8                  |

- 4) It is forbidden and Magazine Luiza will not accept that any employee promises and/or offers gifts and hospitality to public agents/servant with the expectation and/or promise to obtain any type of favor and/or undue advantage.

## 5. MISCELLANEOUS

This policy is effective from the date of its publication and shall be updated whenever necessary and shall be approved by the Board of Directors.

The failure to comply with this policy, or in cases in which gifts, giveaways and/or hospitality offered and/or received are considered irregular based on this and/or other corporate policies, the Integrity Committee will apply the reasonable measures, and in the end may negotiate the voluntary withdrawal of employees or initiate the termination for cause, observing the limits set forth by laws.

## 6. INTERNAL REFERENCE

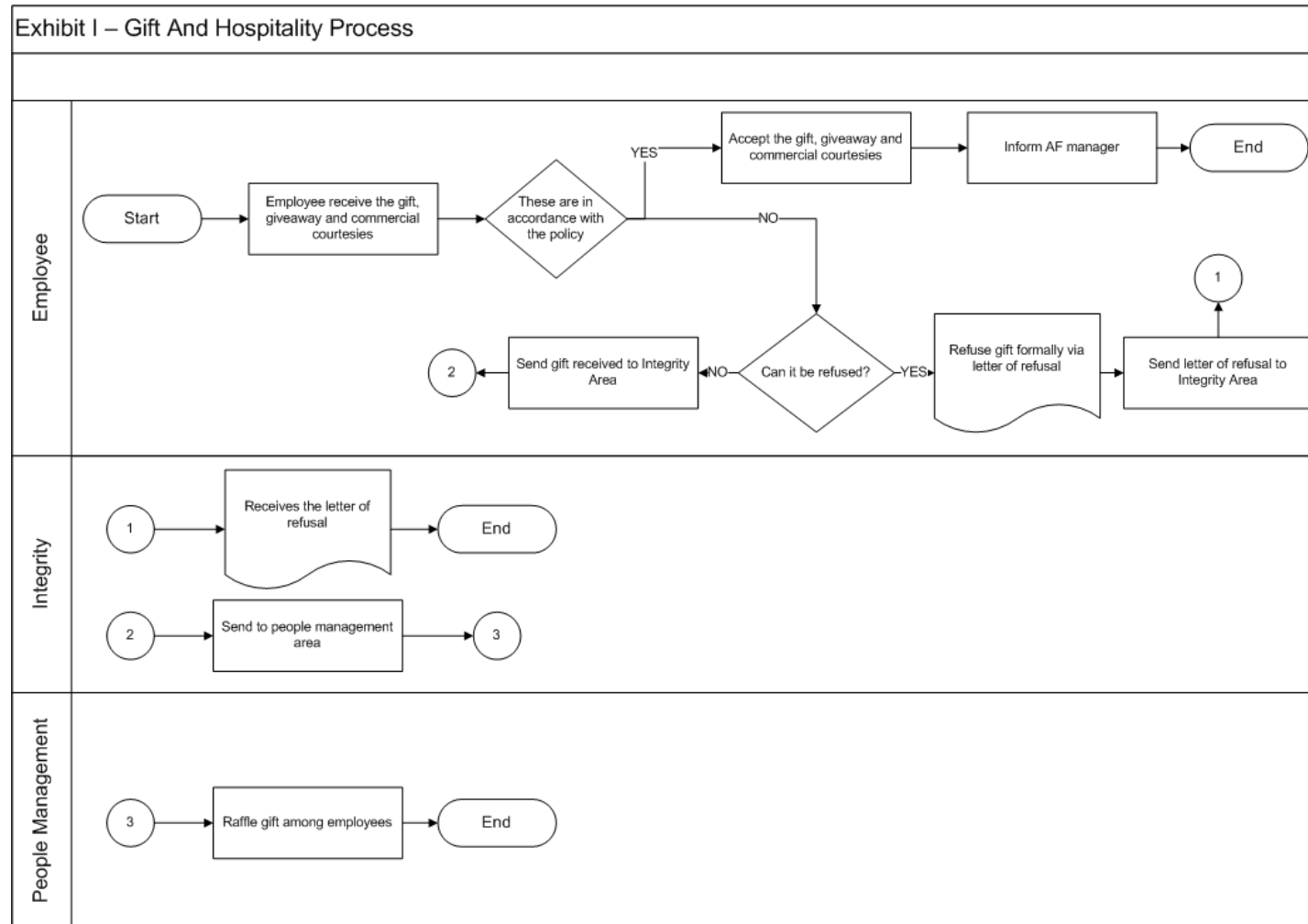
- Code of Ethics and Conduct
- Anti-Corruption Manual
- Third Party Contract Policy
- Donations and Contributions Policy

## 7. EXHIBITS

Exhibit A – Flow of Gifts, Giveaways and Hospitality

Exhibit B – Letter of Gifts and Hospitality Refusal

|                   |   |                              |
|-------------------|---|------------------------------|
| INTEGRITY PROGRAM | GIFTS, GIVEAWAYS AND HOSPITALITY POLICY           | PIN_POL. 01_ML.              |
|                   |   | Rev. 01                      |
|                   |   | Date of approval: 12/13/2017 |
|                   | Security Classification: <b>Internal Document</b> | Page No.: 8                  |



|                      |   |                              |
|----------------------|---|------------------------------|
| INTEGRITY<br>PROGRAM | GIFTS, GIVEAWAYS AND<br>HOSPITALITY POLICY        | PIN_POL. 01_ML.              |
|                      |   | Rev. 01                      |
|                      |   | Date of approval: 12/13/2017 |
|                      | Security Classification: <b>Internal Document</b> | Page No.: 8                  |

## Exhibit II – Letter of Gifts and Hospitality Refusal

XXXXX, MM DD, YYYY

### Letter of Gift and Hospitality Refusal

Dear [Addresser's Name],

I, [Employee's Name], while [employee's position] of Magazine Luiza, very much appreciate the gift [discrimination of item] received on MM/DD/YYYY.

However, this gift disagrees with internal policies of Magazine Luiza. Thus, for us to maintain a good business relationship and comply with internal policies of Magazine Luiza, I am returning the gift mentioned above.

Thank you for your understanding.

Sincerely yours,

\_\_\_\_\_  
[Employee]

\_\_\_\_\_  
[Addresser]