	POLICY	
	Code: POL-00180	Title: GIFTS, PRESENTS AND OTHER COURTESIES POLICY

1 OBJECTIVE

This Policy establishes specific rules and guidelines regarding the offer and receipt of gifts, presents and hospitalities.

These guidelines comprise the Oi Compliance Program and reinforce the company's commitment to the adoption of anti-corruption practices in its corporate operations and emphasize the commitment that all employees shall have regarding transparency, compliance and ethics in interpersonal relations.

The conditions are applicable to the relations between the Company and external people and are not related to what the Company offers to its employees.

2 DEFINITIONS


- **Public Agent** – Any natural person, regardless of public tender procedures, even if temporarily or without remuneration, acting officially or exercising a position, job or public function with a Government Authority; any individual who works for a company that provides services that were hired or associated for the execution of activities that are typical of the Public Administration; or any political party leader, employee or other person acting for, or on behalf of, a political party or candidate for public office.
- **Private Agent** - Any individual not related to the provision of public services and mandatorily related to a private entity.
- **Gifts** - Low value items commonly used for advertising or promotional purposes, whether for a project, event, product, brand, etc.
- **Employee** – Employee who provides services of a non-contingent nature to the Company, at its premises and for a salary. Exceptionally for the purposes of this Policy, the following persons are also considered as employees: (1) the directors, administrators and executive officers, who contribute to the Company's business and activities; and (2) interns, trainees and young apprentices.
- **Courtesies** - For the purposes of this policy is understood as synonymous of gifts, presents or hospitality.
- **N1 Officer** - Executive Officer reporting directly to the Company's President.
- **Protocol event** - Formal events that may occur in the private or public sector.
- **Entertainment** - Activities or events related to leisure such as cultural activities, parties, shows, sports events, reunions and also activities that promote development such as training, workshops, fairs, conventions, congresses, among others.
- **Hospitality** - For the purposes of this policy includes presents, gifts, travels, meals, displacements (air, land and/or sea), lodging, food, entertainment, among others.
- **Presents** - Items that have commercial value given as a courtesy.

The notion of Gifts, Presents, Meals, Travels and Entertainment are further complemented throughout the Policy.

3 CONTENT

3.1. ENFORCEABILITY

This Policy applies to all the Company's employees, regardless of their hierarchical level and function.

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The Company will only afford expenses made by third parties in the shipping/concession of gifts, presents, meals, travels, entertainment or other hospitalities if properly foreseen and authorized in the instrument of their hiring.

3.2. GENERAL RULES

Commercial relationships are often strengthened and stimulated by gift exchanges, however, the Company reinforces its concern with these activities so that there is no improper use for illicit or unethical purposes such as an attempt to influence, undue retribution, legal infraction or even a lawful operation that generates inappropriate appearance or misinterpretation about Oi.

In this sense, **the rules below should be the justification for any decision to offer or receive** courtesies:

In line with the ethical and anti-corruption guidelines it is expressly forbidden to **promise, offer or receive** any gift, present, meal, travel, entertainment or other hospitality to/from public agent and/or private agent in the following situations:


- **Rule 1 - In exchange for any immediate or future favor:** a situation in which there is an undue advantage, an unregulated benefit, a favor not practiced by the market or not foreseen in law. All business/institutional discussions should be based on facts and arguments and should not be guided or influenced by the exclusive exchange of benefits that may configure any undue advantage.
- **Rule 2 - Whose motive or intention is to influence a decision:** a situation in which case the granted benefit goes beyond the intention to foster the business/institutional relationship and is exclusively intended to influence the decision-making process.
- **Rule 3 - When there is expected some kind of retribution:** a situation in which the act of committing, offering or receiving is linked to a retribution, generating a bond of undue retribution.
- **Rule 4 - When it generates a negative impact to the Company's image:** a situation that generates any possibility of unfavorable understanding to the Company's image or in any other circumstance that may generate risk to the Company's image.
- **Rule 5 - As a preceding condition for the realization of some business or commitment for ongoing or potential business:** situation that the benefit offered/received generates an obligation to perform a service or deliver a product, generating a condition of obligation.
- **Rule 6 - When were made in money (cash), bank checks or representative title.**
- **Rule 7 - When the usual character is configured:** although in specific situations the commitment to, offer or receipt of gifts, presents, meals, travel, entertainment or other hospitalities is allowed, the usual character must always be observed. The Company understands that the regularity is related to actions that become frequent to the point of establishing a condition for the maintenance of relations.
- **Rule 8 - When there is divergence regarding the other guidelines described in this policy** such as value limit and specific rules for each type of courtesy (gifts, presents and other hospitalities).

When an employee identifies that courtesy causes uncomfortable or refusal on the part of the other party, it should be prevented, if possible, from taking the action or, if it has occurred, from repeating it.

Even if requested or pushed by a hierarchical superior, the employee should not practice any conduct in disagreement with the Policy.

3.2.1 The prevalence of the most restrictive rule

We highlight that in the existence of specific legislation establishing financial limits other than those stipulated by the Company, the lowest value (more restricted) shall be considered in the offer and/or receipt of gifts. Likewise, if the partner or contrary party in the business relationship has different rules from the Company, the employee must be **guided by the most restrictive rule**.

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The activity of offering and receiving courtesies that involve federal, state or municipal **public agents** is very regulated, so it is up to the employees to dedicate special attention to these cases, as well as always to **research the specific rule in force**, generally described in the Code of Ethics and Conduct of the agent's scope of action, in order to comply with a possible requirement or value more restrictive than that practiced by Oi. If you have any questions, please contact the Integrity Department.

3.2.2 Transparency

The receipt or offer of courtesies must be done in a transparent, non-secret way, without the appearance of an improper act and that does not generate risk for the Company.

3.3. GIFTS

An object is characterized as a gift when, at the same time, the following conditions are identified:

- i) The object has no commercial value (resale);
- ii) It is distributed as a courtesy, advertisement, standard promotion or on occasion of events or commemorative dates; and
- iii) It has a general nature, not being directed exclusively to a particular person.

Usually, the gifts have the logo of the offering company as an advertisement and are intended for the office (agendas, calendars, pen drive, pen, etc.)

3.4. PRESENTS

Presents are defined by items or services of **personal use** and that have **commercial value** (resale).

They are not considered gifts and therefore can be accepted:

- i) Bonus, gratification or scholarship granted in recognition of the intellectual work provided or for professional improvement, in accordance with rules 1 to 5;
- ii) Items raffled in contests, congresses and other institutional events, as long as it does not characterize a specific person and whose events are, ideally, open to the general public;
- iii) Items received or sent to foreign authorities in ceremonial events;
- iv) Institutional benefits granted to clients in promotional campaigns promoted by the Company. Note: benefits to B2B Government customers must be analyzed in order to ensure prevention of risks of conflict of interest or illicitity against the public administration.


The financial limit allowed for the granting and receipt of gifts is **R\$200.00** (two hundred reais). In cases where the present is composed of more than one item, the **sum of the values** of each item will be considered. Likewise, when the gift is divided or installment, the limit value must be considered in relation to the sum of all the parts/items that compose the present.

With regard to receipt, gifts in violation of the rules of this Policy shall be refused immediately upon receipt, however, if refusal is not possible, they must be returned to the shipper immediately thereafter.

The return of gifts should be done through a **standard letter** of gratitude and return available at Interativa. In case it is not possible to return the gift, it must be directed to the Compliance Department for the appropriate measures to be adopted by the Ethics Committee.

Any **exclusion** to the criteria established for offering or receiving gifts shall be submitted to the immediate superior, as well as to the Compliance Department for due verification. If applicable, the Ethics Committee shall be considered for evaluation and deliberation.

Note: Under no circumstances are gifts offered to public agents that exceed the financial limit of R\$200.00 (two hundred reais).

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3.5. MEALS

The concept of meal comprises any and all food (food and beverages) expenses, such as lunches, dinners, coffees, etc.

The payment of expenses related to meals are allowed for **business and institutional purposes only**. In addition, they shall have **moderate value** and be compatible with the people involved and with the context of their achievements.

Given the business and institutional purpose as criteria for the payment of meals, it is not allowed to include a **companion**, except when the meal is part of the schedule of an entertainment event in which the companion has been invited and previously approved, as established for entertainment. If any exclusion is necessary, the approval of the N1 Officer and awareness by the Compliance Department will be required.

For **public agents**, the amount established per person is R\$200.00 (two hundred reais), except for the possibility that, if indicated by the public agent, the limit established and other rules provided by the agent's sphere of action must be respected.

For other **exclusions**, the Compliance Department must be consulted to analyze the complexity and issue an opinion and, depending on the case, the Ethics Committee may be convened to deliberate.

3.6. TRAVELS

It includes all expenses incurred with travel, such as transportation/transfer, lodging, car rental, among others that are directly related to the purpose of the travel. The Company considers that the travel-related expenses should be used in a reasonable manner, always considering the lowest cost and the best commercial service.

The company will only afford travel costs if duly justified, provided that the purpose is to promote **legal business and institutional discussions** that generate benefits for Oi. Accordingly, is not allowed offering or accepting travel that only aims at leisure situations to its beneficiaries.

For the offer or receipt of travel, prior approval of the following sphere is required:

- **National Airline Tickets:** Approval by N1 Officer (REG-194) and awareness by the Compliance Department.
Note: when the beneficiary is the N1 officer himself, he will need the President's approval.
- **International Airline Tickets:** Approval by the President (REG-682) and awareness by the Compliance Department.

The acceptance of an airline ticket by a third party may only occur on an exceptional basis.


If necessary, 1 (one) **companion** will be allowed, in situations of offer or receipt, as long as the above instances approve in advance.

Noteworthy: It is not allowed to offer or receive travels, whether national or international, involving **public agent** and companion.

It is worth noting that all travels offered and received must comply with the Travel Management Process (Cod. G.FNA-02.012) and its Regulations REG-194 - National Corporate Travel and REG-682 - International Corporate Travel.

3.7. ENTERTAINMENTS

Entertainment are events or activities that promote leisure or development, such as: cultural and sports activities, reunions, parties, trainings, workshops, fairs, conventions, congresses, among others.

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3.7.1 Entertainment with third parties and partners

Entertainments that have corporate and institutional nature may be offered or received from third parties when is configured the Company's interest in providing **business and institutional opportunities** or in leisure situations. Having observed the general rules defined in item 3.2, this type of action does not require any additional approval.

Entertainment involving **public agents or companions** that have no corporate nature, meaning that they only promote leisure activities to their participants, must be informed to the knowledge of the Compliance Department and **approved in advance by the President**. In addition, we emphasize the importance of investigating whether the rule applicable to the scope of the public agent allows the receipt of the invitation, according to item 3.2.1.

3.7.2 Entertainment with employees.

Entertainments of a corporate nature or not, promoted or sponsored by Oi, may be distributed to its employees respecting the general rules and ethical guidelines, observing the correct distribution and equal conditions. Any situations that require the distribution of invitations involving entertainment shall be directed to the Corporate Communication Office and/or the People and Management Officer.

The corporate events promoted by Oi to its employees to disseminate technical or scientific information, improve knowledge or stimulate commercial issues may be **sponsored by business partners and/or suppliers**, as long as they do not configure any unusual type of counterpart or preference in relation to the normal course of business. The event project, including its expenses, purpose, participants and the whole contracted structure, must be previously reported to the Compliance Department.

3.8. OTHER HOSPITALITIES

Any other hospitality, which is not provided for in this Policy, may only be given or received after evaluation by the Compliance Department and, if applicable, approval by the Ethics Committee.

3.9. QUESTIONS AND COMPLAINTS

The Company believes that common sense and reasonableness should always be used with expenses for the offer and receipt of gifts, presents, meals, travel, entertainment and other hospitalities.

Any questions, exceptions, approvals or cases not foreseen in this Policy should be addressed to the Compliance Department (ld-compliance@oi.net.br).

All employees have a duty to report through the Whistleblowing Channel any suspicion or knowledge of any breach of the rules set forth in this Policy.

3.10. PENALTIES

The Company emphasize that employees who violate or attempt to violate any disciplined rule in this Policy will be punished with disciplinary measures, following the Company's disciplinary system described in Regulation REG-01020 - DISCIPLINARY SYSTEM and applicable legislation. Such measures may be executed by means of verbal warning, suspension or termination of employment contract, regardless of the possible opening of legal proceedings.

THIS DOCUMENT ANNUL PREVIOUS VERSIONS