

**POLICY OF GIVING  
AND RECEIVING  
GIFTS, TRIPS AND  
ENTERTAINMENT**



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<b>SUBJECT:</b>	GIVING AND RECEIVING GIFTS, TRIPS AND ENTERTAINMENT
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<b>REVISED IN:</b>		<b>AREA OF APPLICATION:</b>	ALL THE AREAS
<b>MANAGER:</b>	Gilberto de Toledo	<b>APPROVAL:</b>	Antonio Jose L. Pargana

EDITION	VERSION	DATE	TOPICS	TYPE (I / E / A / N)	SUMMARY OF CHANGE
2016	01	01/10/2016	N/A	N	-

### LEGEND OF THE REVIEW HISTORY - TYPE OF CHANGE

ABBREVIATION	DESCRIPTION
I	Inclusion: Inclusion of information that does not exist in the previous version.
E	Exclusion: Exclusion of existing information in the previous version.
A	Change or adjust existing information in the previous version.
N	New: Indicates the date the policy was created, which corresponds to the first version of the document.

## 1. OBJECT

The purpose of this Policy is to establish guidelines, criteria, responsibilities and procedures to be observed in giving and receiving something of value or actions that could indicate offer of undue advantage, bribes or intention of getting special treatment or that can possibly generate conflicts of interests.

## 2. INTRODUCTION

There are a myriad of ways to promote the name of the company, cultivate business relationships with customers, partners and service providers and encourage the growth of Cisa Trading before strategic allies. Offers can be a very useful tool in business, often part of the relationship protocol.

On the other hand, accepting or offering Value Things to a third party may feature undue advantage or even bribery if offered with the intent to circumvent the law or unduly influence who receives the courtesy. Giving or accepting Things of Value can create conflicts between personal interests and professional responsibility. The biggest problem is the abusive use of these mechanisms, which can bring disruption, or even damage to the image and reputation of Cisa Trading.

Based on ethical, transparent and legal behavior, Cisa Trading publishes this Policy of Giving and Receiving Gifts, Trips and Entertainment, which aims to clarify to all Employees and Third Parties about situations that should be avoided and to clearly establish the guidelines from the company.

## 3. SCOPE

The Policy of Giving and Receiving Gifts, Trips and Entertainment extends to all members of the management, employees, trainees and service providers who work at Cisa Trading and its companies.

## 4. REGULATION

The main laws guiding the Policy of Giving and Receiving Gifts, Trips and Entertainment are:

- North-American law FCPA (Foreign Corrupt Practices Act)
- British law UKBA (United Kingdom Bribery Act)

- Brazil national law Anti-Corruption (12.846/2013)
- Criminal Code (Decree Law 2848)

## 5. DEFINITIONS AND REFERENCE

In order to facilitate the understanding the Policy of Giving and Receiving Gifts, Trips and Entertainment, it is imperative that all employees of the company are familiar with the following definitions:

### GIVEAWAYS

Souvenir distributed as a courtesy, advertising, publicity, or in the case of promotion, event or commemorative date. It is the distribution of souvenirs in a generalized and impersonal way; i.e., it is not destined to one particular person or small group.

### GIFTS

something valuable, usually more valuable than giveaways, selected to please the recipient. Unlike giveaways, they are addressed to one or a few people in particular and are offered as a result of personal or business relationship with the recipient.

### ENTERTAINING

Activities or events for leisure, recreation or entertainment, such as artistic concerts, theatrical plays, operas, dance spectacles, music concerts, sporting events, etc.

### TRIPS

Trips offered with legitimate and justifiable means to promote company business. This includes fares, accommodation, transfer, taxi, meals, and other costs incurred in a business trip.

### HOSPITALITY

Involves trips, meals and entertainment.

### DONATIONS AND SPONSORSHIP

Any benefit granted to charities must be in accordance with the Anti-Corruption Policy, and must be requested the Department of Marketing via Service Desk (**PÁGINA INICIAL > MARKETING > PATROCÍNIO E DOAÇÃO > SOLICITAR SERVIÇO**),

according to the rules established in the Anti-Corruption Policy and in line with the Compliance Policy.

## THINGS OF VALUE

Things of value include money, gifts, travel, entertainment, job offers and meals to work. Any item of value may also include sponsorship of events, scholarships, research support, and solicited charitable contributions or for the benefit of a government official or family member, even if for the benefit of a legitimate charitable organization.

### 5.1. REFERENCE DOCUMENTS

- Code of Ethics Cisa Trading
- Anti-corruption Policy
- Policy of Compliance

### 5.2. DOCUMENTS INVOLVED

Does not apply.

## 6. GUIDELINE

### 6.1. GUIDELINES FOR OFFERING AND RECEIVING THINGS OF VALUE

- **General rules for offering things of value:** it is forbidden to offer things of value with the intention of obtaining undue advantage, violating the law or to influence business decisions in an unethical way.
- **General rules for receiving things of value:** It is forbidden to accept Something of Value in exchange for undue advantage from a third party or to obtain business, and it is likewise forbidden to request from or imply to third parties the willingness to be offered giveaways, gifts, gratuities, presents or benefits for personal advantage of Collaborators of Cisa or third parties on behalf of Cisa.

### 6.1.1. GUIDELINES FOR OFFERING THINGS OF VALUE

- **Giveaways and gifts:** The employees must follow the rules below when offering Things of Value to Third Parties. The offers must always be previously approved by the Director who, in case of doubt, will consult the Compliance.

Something of value to third parties can only be offered with legitimate business purposes, aiming to strengthen business relationships, as long as:

- The offer does not have potential to cause awkwardness to Cisa Trading or the recipient, if it goes public;
  - Cash or cash equivalent is not offered;
  - It does not characterize undue advantage like bribery or gratuity;
  - It is not forbidden by law;
  - It is not forbidden by the organization to which the recipient belongs (information should be obtained);
  - It is not offered in disguise of services or other benefits, through third parties;
  - It is not offered to Public Agents.
- **Entertainment:** Concerning Entertainment, the same rules for giveaways and gifts apply, but the offer of Entertainment to the same individual can not be frequent.

Entertainment must be reasonably related to a legitimate business purpose and must take place in appropriate venues and does not constitute "adult" entertainment or similar, or gambling.

In order to characterize Entertainment, the host or the person who is making the invitation must join the guest and be present. Tickets for cultural or sporting events must be previously approved by the Director and by the General Counsel..

- **Trips:** Exceptionally, it might be justifiable that Cisa Trading should pay for third party travel expenses. Since this is an exception, every offer of funding trips and/or expenses of third parties must necessarily be communicated in writing and approved by the Director and by the President.

The criteria used for the approval of a trip are (i) budget availability; (ii) the purpose of the trip being primarily business (iii) that the flight class (cabin) is consistent with the policy of both organizations, Cisa Trading and the Third Party; (iv) the proposal of daily expenses for funding be reasonable and fits the nature of the trip.

### 6.1.2. GUIDELINES FOR RECEIVING THINGS OF VALUE

- **Giveaways and gifts:** The employees must follow the rules below when receiving Things of Value of Third Parties.

The employees may accept Things of Value as long as:

- The value does not exceed R\$200,00 (two hundred reais) in case of Giveaways or Gifts (even if of promotional nature). Anything that exceeds these amounts should be authorized by the Director;
  - It is not cash or equivalent (such as gift voucher or gift card);
  - It does not give the impression, or any implicit obligation, that the one who is offering the giveaway or gift will be entitled to special treatment, to win a contract, better prices or conditions;
  - It does not cause awkwardness to Cisa Trading or the offerer, in case it goes public;
  - It is not forbidden by law;
  - It is not forbidden by the organization who gives the gift (information should be obtained);
  - It is not offered as a bribe, reward, commission or "gratuities", to win a business or gain undue advantages;
  - It is not offered for services or other non-monetary or tangible benefits (e.g., the promise or getting a job for a relative).
- **Entertainment:** In the case of Entertainment, the value does not exceed R\$800,00 (eight hundred reais). The offer of Entertainment from the same Third Party should not be frequent. If the Collaborator receives a second offer for Entertainment from the same Third Party less than 12 (twelve) months from the previous offer, the fact must be reported to the Director or Compliance before it is accepted.

Entertainment offered to Collaborators should also be reasonably related to a legitimate business purpose and must take place in appropriate venues and does not constitute "adult" entertainment or similar, or gambling.



In order to characterize Entertainment, the host or inviting individual must join the Collaborator and be present. Tickets for cultural or sporting events offered to the Collaborator without the presence of the host must be treated as Gifts and requires previous approval of the Director in order to be used.

- **Trips:** Exceptionally, it might be justifiable that Third Parties should pay for the travel expenses of our Collaborators. Since this is a rare situation, every offer of funding trips and/or expenses of Collaborators must be communicated in writing and approved by the Director of the travelling Collaborator.

The criteria used for the approval of a trip are (i) the purpose of the trip being primarily business (ii) that the flight class (cabin) is consistent with the policy of both organizations, Cisa Trading and the Third Party; (iii) the proposal of funding travel expenses be reasonable and fits the nature of the trip.

**Remember: any offer and receive of giveaways, gift, hospitality, trips, entertainment or any advantage of relevant value must comply with the rules established by the organization to which the person belongs, as well as the local rules and cultures and legislations that deal with the theme.**

**You should never solicit or insinuate Third Parties who offer giveaways or gifts, cash, gratuities or benefits at your own advantage, whatever the value.**

## 7. STANDARDS

The Policy of giving and receiving gifts, trips and entertainment is guided and / or guided by the following internal standards:

- Policy of Anti-Corruption
- Policy of Compliance
- Regulation of Corporate Compliance
- Regulation of Corporate Audit
- Regulation of Supplier Approvals
- Regulation of Service Provider Management
- Regulation of Credit Granting

- Regulation of Prospecting and Capturing Customer
- Regulation of Import
- Regulation of Complaint

## **8. RESPONSABILITY**

### **8.1. PRESIDENCY**

It is the responsibility of the Presidency to ensure in a corporate manner that employees of the company and approved service providers working with Cisa act in compliance with the guidelines of the Policy of giving and receiving gifts, trips and entertainment.

### **8.2. LEGAL**

It is under its responsibility with regard to the scope of the Policy of giving and receiving gifts, trips and entertainment:

- The clarification of any doubts about the application of the Laws that guideline this policy.
- Support in investigations of complaints.

### **8.3. GOVERNANCE, RISK AND COMPLIANCE**

It is under its responsibility with regard to the scope of the Policy of giving and receiving gifts, trips and entertainment:

- Creation of monitoring routines to ensure that Cisa's main reputational risk points are covered.
- Continuous training and development of a preventive and corrective communication plan on the subject.
- Development and continuous updating of the company's policies, regulations and operational procedures in compliance with the Policy of giving and receiving gifts, trips and entertainment.

### **8.4. BOARD OF DIRECTORS**

It is under its responsibility with regard to the scope of the Policy of giving and receiving gifts, trips and entertainment:

- The clarification of any doubts about the application of this Policy with its employees.
- Approval of receipt and offer of things of value that are sent by its employees according to the scope mentioned in the guidelines.
- Approval of third party travel costs payment by Cisa that are executed within its scope of work.
- Approval of permission for employees to offer and/or receive entertainment invitations.

## 8.5. EMPLOYEES

The obligations of a Cisa Trading Collaborator are:

- To avoid situations that can cause awkwardness to Cisa Trading or any business collaborator;
- To not allow the offering and receiving of Things of Value with the intention of getting undue advantage;
- To explain Cisa Trading's policies to business collaborators and to Third Parties;
- If manager or director, to instruct your team and make sure everyone is aware of and abides by this Policy;
- To discourage third parties who seek to influence your decisions by offering Thing of Value;
- To communicate your Director about any offer or Things of Value that receive, which exceeds the limits established in this Policy;
- In case of doubts, ask your Director or Compliance.

## 9. ATTACHED

Does not apply.