

LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.
NATIONAL CORPORATE TAXPAYERS' REGISTER OF THE MINISTRY OF FINANCE (CNPJ/MF) under No.
09.041.168/0001-10
NIRE (State Registration Number) 31.300.027.261

Publicly-Held Company

MINUTES OF THE MEETING OF THE BOARD OF DIRECTORS HELD ON NOVEMBER 16, 2018

The Meeting of the Board of Directors of **LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.** ("Company") was held with the attendance of all of its undersigned members, regardless of call. The directors Barry Stuart Sternlicht and Ryan William Hawley attended the meeting by videoconference, pursuant to article 21 of the Company's Bylaws. The meeting, chaired by Mr. **Rubens Menin Teixeira de Souza**, and having as its secretary Mr. **Felipe Enck Gonçalves** was held at 9:00 a.m. hours of November 16, 2018 at the Company's headquarters, at Avenida Professor Mário Werneck, No. 621, 10th floor, set 2, district of Estoril, Belo Horizonte, State of Minas Gerais, Zip Code 30.455-610. According to the Agenda, the following resolutions were taken and approved by unanimous vote: (a) **To approve** the creation of the Company's Audit Committee, except that its operation, composition and budget shall be provided for in the Internal Regulations of the Audit Committee, as approved in resolution "c" below, and the election of its members shall be carried out until the conclusion of the Company's conversion process from "B" category to "A" category before the Brazilian Securities Commission and listing and adhesion by the Company to Novo Mercado segment of B3 SA - Brasil, Bolsa, Balcão ("Conversion and Listing"); (b) **To approve** the creation of the Company's Compliance Committee, except that its operation, composition and budget shall be provided for in the Internal Regulations of the Compliance Committee, as approved in resolution "c" below, and the election of its members shall be carried out until the conclusion of the Conversion and Listing process; (c) **To approve**, subject to the effective approval of the corporate spin-off operation of MRV Engenharia e Participações SA, enrolled with the CNPJ/MF under No. 08.343.492/0001-20 and NIRE 31.300.023.907 ("MRV"), whose spun-off assets shall exclusively comprise MRV's ownership interest in the Company, followed by the merger of the Company's spun-off installment, (1) the termination of the (i) Securities Trading Policy of the Company currently in effect; and (ii) Internal Regulations of the Compliance Committee currently in effect; and (2) the wording and implementation of the following internal policies and regulations of the Company, as set forth in Exhibit I hereto; (i) Policy of Transactions with Related Parties; (ii) Managers Appointment Policy; (iii) Securities Trading Policy; (iv) Risk Management Policy; (v) Managers Compensation Policy; (vi) Internal Regulations of the Board of Directors; (vii) Internal Regulations of the Audit Committee; (viii) Internal Regulations of the Investment Committee; (ix) Internal Regulations of the Finance Committee; (x) Internal Regulations of the Management and Advisory Committee; (xi) Internal Regulations of the Compliance Committee; (xii) Code of Conduct; and (xiii) Compliance Policy; and (d) **To authorize** the Company's management to execute all documents and perform all acts required and convenient for the implementation of the resolutions taken herein. Without further issues to consider, the meeting was closed, of which these minutes were drawn up, which, after being read and approved, were signed by all those in attendance. Belo Horizonte, November 16, 2018. **Rubens Menin Teixeira de Souza**, Chairman; **Felipe Enck Gonçalves**, Secretary. **Rubens Menin Teixeira de Souza**; **Marcos Alberto Cabaleiro Fernandez**; **Leonardo Guimarães Corrêa**, **Marcelo Martins Patrus**, **Ryan William Hawley**, **Barry Stuart Sternlicht** and **Manuel Maria Pulido Garcia Ferrão de Sousa**.

For all legal purposes, it is hereby stated that a true and authentic copy is filed and signed by those in attendance in the proper book.

Checked with the original copy:

Felipe Enck Gonçalves

Secretary of the Meeting

DOCUMENT I - Authentication of the Meeting of the Board of Directors of LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A., held on November 16, 2018.

Felipe Enck Gonçalves

EXHIBIT I
to the minutes of the Meeting of the Board of Directors of LOG Commercial Properties e
Participações S.A., held on November 16, 2018

Policies and Internal Regulations of the Company

POLICY OF TRANSACTIONS WITH RELATED PARTIES OF LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.

1. PURPOSE

1.1. This Policy of Transactions with Related Parties of LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A. ("Company" or "LOG"), approved at a meeting of the Board of Directors held on November 16, 2018 ("Policy"), seeks to set out the guidelines to make sure that all decisions, especially those involving related parties, are made through a transparent process to the interests of LOG and its shareholders, pursuant to Law No. 6404, dated December 15, 1976, as amended, ("Corporations Law"), of the Novo Mercado Regulation of B3 S.A. - Brasil, Bolsa, Balcão, effective as of January 2, 2018, and corporate governance practices.

2. APPLICATION

2.1. This Policy applies to the Company, its joint ventures and special purpose companies ("SPEs"), and must be observed by its (i) shareholders; (ii) employees; and (iii) managers, as well as their respective spouses or partners, children, children of their spouses, partners, and their dependents, or those of respective spouses, partners, as shown in Exhibit I hereto.

2.2. Upon their investiture, the members of the Board of Directors and Executive Board of LOG shall complete and sign the Related Party Identification Form, as per Exhibit I and II.

3. DEFINITIONS

3.1. For the purposes of this Policy, a few terms must be understood as follows:

"Next of Kin" They mean those family members who can be expected to influence or be influenced by the person in the business of those members with the entity, including: (i) the children of the person, spouse or partner; (ii) the children of the spouse of the person or partner; and (iii) dependents of the person, of their spouse or partner.

"Related Party" It means, pursuant to Technical Pronouncement CPC 05(R1), issued by the Accounting Pronouncements Committee, approved by the Brazilian Securities and Exchange Commission ("CVM") through Resolution no. 642 of October 7, 2010 ("Deliberation 642"), the person or entity that is related to the Company.

A person, or Next of Kin, is related to the Company if: (i) they have full or shared control of the Company; (ii) they have significant influence over the Company; or (iii) is a member of the Key Management Personnel of the Company or its parent company.

An entity is related to the Company if any of the following conditions are observed: (i) the entity and the Company are members of the same economic group (which means that the parent company and each subsidiary are interrelated, as well as the entities under common control are interrelated between themselves); (ii) the entity is a joint venture of

another entity (or joint venture of an entity from an economic group of which the other entity is a member); (iii) both entities are joint ventures of a third entity; (iv) an entity is a joint venture of a third entity and the other entity is an affiliate of that third entity; (v) the entity is a post-employment benefit plan, beneficiaries of which are the employees of both entities, the Company and the one related to the Company; if the Company itself is a post-employment benefit plan, the employees contributing to it shall also be considered parties related to the Company; (vi) the entity is fully- or jointly-owned by a person identified in the paragraph above; (vii) a person identified in the paragraph above, item "i" has significant influence over the entity, or is a member of the Key Management Personnel of the entity (or entity's parent company); and (viii) the entity or any group member of which it is a member provides Key Personnel Management services to the Company or its parent company.

It is noteworthy that, for the purposes of this definition, an affiliate comprises the subsidiaries of such affiliate, and a joint venture comprises the subsidiaries of such joint venture.

"Key Management Personnel"

They mean persons who have authority and responsibility for the planning, direction and control of the entity's activities, directly or indirectly, including any manager (executive or otherwise) of such entity.

"Transaction with Related Party"

Means the transfer of resources, services or obligations between Related Parties, regardless of whether a price is charged in return.

3.2. For the purposes of this Policy, the definitions in this item 3 and the provision in the item 3.3. below, shall be automatically updated as a result of any changes to the applicable standards and regulations.

3.3 For the purposes of this Policy, the following parties are not considered Related Parties: (i) two entities simply because they have a manager or other member of the Key Management Personnel in common, or because a member of the Key Management Personnel of the entity exerts significant influence over the other entity; (ii) two investors simply for sharing joint control over a joint venture; (iii)(a) entities that provide credit facilities and investments (financial activities); (b) unions; (c) entities that provide public services; and (d) State departments and agencies that do not fully or jointly control, or exert significant influence over, the entity reporting the information, simply because of their normal business with the entity (even if they may affect the freedom of action of the entity or participate in its decision-making process); and (iv) customer, supplier, franchisor, dealer, distributor or general agent with whom the entity has significant volume of business, merely by virtue of the resulting economic dependence.

4. TRANSACTIONS INVOLVING RELATED PARTIES

4.1. Criteria to be observed: LOG, its joint ventures and their SPEs, may carry out Transactions with Related Parties if they observe the market conditions, that is, the prices and conditions of the services procured must be in accordance with those practiced in the market, following the same trading guidelines carried out by the Company and its subsidiaries with independent parties.

4.1.1. First of all, Related Party Transactions shall take into account the interests of the Company and its joint ventures or SPEs, as the case may be, through a transparent and ethical process, in accordance with the current legislation. In addition, such transactions should be fair and commutative.

4.2. Identification of Related Parties and situation of approval: The Related Party Transactions must be previously identified and assessed by the Company's Audit Committee, which will act in such a way as to make sure that said transactions: (i) are made in writing, specifying their main characteristics, under conditions equivalent to those available in contracts with unrelated parties; (ii) are carried out at usual market prices, terms and rates, or from previous trading representing commutative conditions; and (iii) are clearly reflected in the financial statements.

4.2.1. Once the Company's Audit Committee has identified and assessed the Related Party Transactions, according to item 4.2 above, it shall be incumbent upon the Company's Board of Directors or its shareholders, as the case may be, to assess and approve the transaction, in accordance with its Articles of Incorporation and its shareholders' agreement, if any. In the event the transaction does not exceed the limits set forth in the Articles of Incorporation and in shareholders' agreements, if any, the power to approve the transaction is of the Executive Board.

4.3. Conflict of interests and impediment to vote: This Policy is in line with the requirements of the Corporations Law, particularly with regard to the necessary loyalty of managers to the Company. According to art. 155 of said provision, the manager must be loyal to the Company, making sure that Company's interests always come first, compared to the personal interests of the decision makers. Thus, a conflict of interests is established when the manager or shareholder, as the case may be, can influence the final result of the decision-making process, in order to obtain a particular benefit for themselves, a family member, or third party with which they are involved.

4.3.1. In situations of conflict of interests, even if potential, it is the responsibility of the manager to inform the others, as well as the Board of Directors, of the conflicting situation, thus being prevented from intervening in the operation, and must mention their impediment in the minutes of the Board of Directors, pursuant to the provisions of art. 156 of the Corporations Law.

4.3.2. If any manager, who may have a potential private gain from a decision, fails to express their conflict of interest, any other member of the body to which they belong, who becomes aware of the situation, may do so.

4.4. Disclosure: The Company is bound to disclose Related Party Transactions in accordance with art. 247 of the Corporations Law, CVM Instruction no. 480, dated December 7, 2009, as amended ("CVM Instruction 480"), and Resolution 642.

4.4.1. LOG shall make available on the worldwide computer network information on transactions between the Company and Related Parties, through (i) of its Reference Form; (ii) explanatory notes to the financial statements; (iii) material fact or other instrument that may be required by CVM Instruction 480; or (iv) material fact, as the case may be, in accordance with applicable legislation, in order to ensure the transparency of the process to shareholders, investors and the market.

4.4.2. The value of total assets must be determined, based on the latest financial statements or, when applicable, on the Company's latest consolidated financial statements.

4.5. **Penalties:** Any breach of this Policy shall be submitted to the Company's Board of Directors, and any relevant penalties shall be applied, without prejudice to the penalties provided for in the current legislation.

5. DOUBTS

5.1. Any doubts or clarifications regarding the application of this Policy shall be sent to the Investor Relations Board, at ri@logcp.com.br.

6. GENERAL PROVISIONS

6.1. It shall be incumbent upon the Board of Directors to evaluate the adequacy of this Policy of the Company and make amendments whenever necessary.

6.2. This Policy is available on the Company's website (www.logcp.com.br/ri), as well as on the website of the Securities and Exchange Commission (www.cvm.gov.br).

6.3. This Policy shall enter into force upon its approval by the Board of Directors, and shall remain in force for an indefinite period, pending a decision to the contrary. Any amendments to this Trading Policy shall be approved by the Board of Directors.

* * *

Related Party Identification Form - Exhibit I

	Name	Individual Taxpayer Registry
Member of the Board of Directors or Executive Board		
Spouse or Partner		

PERSON(S) RELATED TO MEMBER OF THE BOARD OF DIRECTORS OR EXECUTIVE BOARD

Besides spouse or partner, will be considered as a related person:

- children of the person;
- children of the spouse or partner;
- dependents of the person, its spouse or partner;

Name(s) of the Related Party(ies)	Degree of Kinship	Individual Taxpayer Registry

Date:

Signature:

Related Party Identification Form - Exhibit II

	Name	Individual Taxpayer Registry
Member of the Board of Directors or Executive Board		

COMPANY(IES) OR LEGAL ENTITY(IES) ASSOCIATED WITH MEMBER OF THE BOARD OF DIRECTORS OR EXECUTIVE BOARD OR TO THE RELATED PARTY(IES)

Identify the entities or companies when the following conditions are met:

- the entity is controlled, either totally or under joint control, by a member of the Board of Directors or Executive Board or person related to LOG, pursuant to Exhibit I;
- a person who holds total control or joint control of LOG has significant influence on the entity or is a member of the key management personnel of the entity (or entity's parent company);
- entity in which the member of the Board of Directors or Executive Board or person related to LOG, pursuant to Exhibit I, individually holds, at least, 10% of the capital stock;

Name(s) of the Related Party(ies)	Name of the Company(ies) or Entity(ies) - Corporate Name and Trade Name	National Registry of Legal Entities	Relation with the company(ies) or entity(ies)

Date:

Signature:

MANAGERS APPOINTMENT POLICY OF LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.

1. PURPOSE

1.1. The purpose of this Managers Appointment Policy of LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A. ("Company"), approved at a meeting of the Board of Directors held on November 16, 2018 ("Policy"), is to identify the rules and guidelines to be observed for the appointment of members of the Executive Board appointed pursuant to the Articles of Incorporation, the Board of Directors, and the Company's advisory committees (committees created to advise the Company's Board of Directors, hereinafter referred to as "Advisory Committees"). The referred to rules and objectives seek to align the process of appointment and election of the Company's management to the best corporate governance practices, as well as to the provisions of the Novo Mercado Regulation of B3 S.A. - Brasil, Bolsa, Balcão ("B3"), effective as of January 2, 2018 ("Novo Mercado Regulation").

2. GOVERNANCE

2.1. The Policy was developed by the Executive Board, which submitted it to the Board of Directors for approval at a meeting convened for that purpose. The Board and the Executive Board shall jointly handle the implementation and observance of the Policy.

2.2. The Executive Board will monitor the changes and updates to the applicable legislation and regulations, as well as the market practices adopted by companies with a similar profile, if necessary, to propose changes to this Policy.

3. APPOINTMENT

3.1. The Board of Directors will be responsible for evaluating candidates for management positions, as well as their resumes and previous experience. Once the candidates have been selected, pursuant to this Policy, Novo Mercado Regulation, and Company's shareholders' agreement, if any, the Board of Directors shall submit to the Shareholders' Meeting or to the Board of Directors, as applicable, the names chosen for voting and election.

3.2. Executive Board appointed pursuant to the Articles of Incorporation

3.2.1. The Company's Executive Board shall be comprised of at least 2 (two) and at most 3 (three) members, shareholders or not, being 1 (one) Officer without specific designation, 1 (one) Chief Operating Officer and 1 (one) Chief Financing and Investor Relations Officer, elected for a term of 2 (two) years, with the possibility of reelection.

3.2.2. Among the recommendations made by the Executive Board, the Board of Directors shall elect the Officers, in compliance with the quorums set forth in the Company's Articles of Incorporation and shareholders' agreements, if any, which may be removed at any time by the Board.

3.2.3. In case of absence or temporary impediment of any Officer, the Board of Directors shall appoint an alternate to perform the functions of the absent or impeded Officer, for the remaining term of office of the replaced Officer, or elect a new Officer to occupy the position of the absent Officer.

3.2.4. For purposes of reelection of Executive Board members, the performance of the Officer during their term of office, as well as the experience and availability shown in the performance of their duties shall be considered.

3.3. The Board of Directors

3.3.1. The Board of Directors shall be comprised of at least 3 (three) and at most 9 (nine) effective members, and at least 1 (one) and at most 9 (nine) alternate members, elected for a unified term of office of 2 (two) years, with the possibility of reelection.

3.3.2. Among the recommendations made by the Board of Directors, the Company's shareholders, met at a Shareholders' Meeting and in compliance with the quorums provided for in the Company's Articles of Incorporation and shareholders' agreements, if any, shall elect the Board members, who may be removable at any time by the shareholders, and shall remain in office in their respective positions, until the investiture of their successors.

3.3.3. The Shareholders' Meeting that decides on the election of the effective members of the Board of Directors shall decide on the number of alternate members of the Board of Directors to be elected, and such number may be changed at any time, at the discretion of the Shareholders' Meeting.

3.3.4. The Board of Directors shall have 1 (one) Chairperson and 1 (one) Vice-Chairperson, who shall be elected by a qualified majority of the votes present, at the first meeting of the Board of Directors held immediately after the investiture of said members, or whenever there is a vacancy of said positions.

3.3.5. Of the members of the Board of Directors, at least 2 (two), or the equivalent to 20% (twenty percent), whichever is greater, shall be independent members, in accordance with the Novo Mercado Regulation.

3.3.6. In the event of fractional number of directors, as a result of observance of the percentage referred to in this paragraph, such fractional number shall be rounded up to the immediately higher whole number.

3.3.7. In the event of absence or temporary impediment of the Chairperson of the Board of Directors, the Vice-Chairperson shall take over the duties of the Chairperson. In the event of absence or temporary impediment of the Vice-Chairperson of the Board of Directors, other member of the Board of Directors chosen by the majority of votes of the members of the Board of Directors shall take over the functions and the Chairperson shall appoint the secretary of the meeting.

3.3.8. In case of vacancy of the position of any member of the Board of Directors, the alternate shall be appointed by the remaining directors and shall serve until the first subsequent Shareholders' Meeting. In case of vacancy of the majority of the positions, a Shareholders' Meeting shall be called so that a new election may be held. For purposes of this article, a vacancy occurs with removal, death, resignation, proven impediment or disability.

3.3.9. The members of the Board of Directors cannot depart from their duties for more than 30 (thirty) consecutive days, under penalty of loss of term of office, except in the case of leave granted by the Board of Directors.

3.3.10. For purposes of reelection of members of the Board of Directors, the performance of the Director during their term of office, as well as the experience and availability shown in the performance of their duties shall be considered.

3.3.11. The member of the Board of Directors must have an unblemished reputation, and it is not possible to be elected, unless waived by the Shareholders' Meeting, the person who (i) occupies positions in companies that may be considered competitors of the Company; or (ii) has or represents an interest that conflicts with those of the Company.

3.3.12. For the Company's Board of Directors, only professionals that are qualified, experienced and are aligned with the Company's values and culture, as well as ethical and behavioral aspects provided for in the Company's Code of Conduct, shall be appointed.

3.4. Committees of the Board of Directors

3.4.1. The Board of Directors, for better performance of its functions, may create Advisory Committees for technical or consulting purposes, with defined objectives and functions.

3.4.2. The Advisory Committees shall be composed of members of the Company's management bodies or not.

3.4.3. The Board of Directors shall elect the members of the Committees, in compliance with the quorums set forth in the Company's Articles of Incorporation and shareholders' agreements, which may be removed at any time by the Board.

3.4.4. For purposes of reelection of members of the Advisory Committees, the performance of the referred to member during their term of office, as well as the experience and availability shown in the performance of their duties shall be considered.

4. Assessment and Appointment Guidelines

4.1. The evaluation of candidates for member of the Executive Board appointed pursuant to the Articles of Incorporation, Board of Directors and Advisory Committees shall be made by the Board of Directors considering the aspects described below:

- a) the number of positions to be filled, and the current composition of each body;
- b) the strategy and objectives of the Company and of each management body; and
- c) the complementarity and diversity of experiences, considering the other members of the body in question, academic formation, availability of time for the performance of the function, ethics, diligence, competence, previous experiences and professional trajectory, knowledge of the corporate governance standards and the fiduciary responsibilities pertaining to management members, unblemished reputation, personal, moral and professional integrity, independence, area of expertise, ability to aggregate and contribute, and corporate experience;

4.2. The elements identified above are examples, not comprehensive in nature, and shall have the same weight and importance in the evaluation of candidates by the Board of Directors.

5. General Provisions

5.1. **Shareholders' Agreements:** This Policy shall comply with the provisions contained in the shareholders' agreements filed at Company's headquarters, if any.

5.2. **Amendment:** Any amendment to this Policy must be informed to the Brazilian Securities and Exchange Commission ("CVM") and to B3.

5.3. Adhesion: The members of the Executive Board appointed pursuant to the Articles of Incorporation, the Board of Directors and Advisory Committees elected under this Policy shall adhere to this Policy by signing the Instrument of Adhesion, as per the template in Exhibit I hereto.

5.4. Term of Effectiveness: This Policy shall enter into force upon its approval by the Board of Directors, and shall remain in force for an indefinite period, pending a decision to the contrary by the Board of Directors.

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EXHIBIT I - INSTRUMENT OF ADHESION TO THE APPOINTMENT POLICY

INSTRUMENT OF ADHESION TO THE APPOINTMENT POLICY OF
LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.

By this private instrument, [NAME], [nationality, marital status, profession], bearer of Identity Card (RG) no. [•], enrolled with the CPF/MF under no. [•], resident and domiciled in the City [•], State [•], with office at [full address], in the capacity of [position] [of the Executive Board / of the Board of Directors / of the Committee [committee name]] of **LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.**, a company with registered office in the City of Minas Gerais, State of Belo Horizonte, at Avenida Professor Mario Werneck, no. 621, CEP 30455-610, enrolled with the CNPJ/MF under no. 09.041.168/0001-10 ("Company"), hereby under this Instrument of Adhesion states to have become aware of the Appointment Policy, approved at the meeting of the Board of Directors held on [•] [•], 2018, pursuant to the Novo Mercado Regulation of B3 S.A. - Brasil, Bolsa, Balcão, in effect as of January 02, 2018, and undertakes to observe the standards and procedures provided for in such document and based his/her actions in relation to the Company always in compliance with such provisions.

[City, date]

[NAME]

**SECURITIES TRADING POLICY ISSUED BY
LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.**

**CHAPTER I
PURPOSE AND SCOPE**

Article 1 The purpose of this Trading Policy, approved at a meeting of the Board of Directors held on November 16, 2018 ("Policy"), is to set the rules and procedures to be observed by **LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.** ("Company") and the persons referred to in Article 2 below, in the trading (purchase/sale of shares, share rentals, donations of shares, and purchase/sale of stock options) with securities issued by the Company, or referenced to them, in order to preserve the transparency of the trading.

Article 2 The following parties must adhere to this Trading Policy, upon signature of specific Instrument of Adhesion (as per template contained in Exhibit I), namely: the controlling shareholder, managers, members of the Fiscal Council, when installed, and members of technical and advisory bodies, which may be created under the provisions of the Articles of Incorporation, or any employees holding Company shares and hired third parties that, by virtue of the title and position they hold at the Company, its subsidiaries or affiliates, have or may have access to relevant information ("Bound Parties").

**CHAPTER II
MANAGING THE POLICY**

Article 3 The Company appoints the Chief Investor Relations Officer ("DRI") as the officer responsible for the performance, monitoring and general management of the Trading Policy, and for all communication between the Company and the Brazilian Securities and Exchange Commission ("CVM") and Stock Exchanges, as well as between the Company and the market, investors and analysts.

Article 4 Doubts related to this Trading Policy, interpretation of applicable standards and/or the possibility (or not) of conducting certain transactions with securities issued by the Company and not provided for herein shall be clarified with the DRI.

**CHAPTER III
RESTRICTIONS ON TRADING**

Article 5 The Company and Bound Parties cannot trade, directly or indirectly, securities issued by the Company:

- (a) in the period between the date on which they become aware of relevant information and the date of its disclosure to the market of a relevant act or fact related to the completion of the negotiation or transaction to which referred relevant information was related. Relevant information means any and all information that may generate an economic impact on the Company or on the value of its shares;
- (b) when the transfer of corporate control, merger, total or partial spin-off, consolidation, corporate conversion or reorganization is intended;
- (c) in the period comprised between the decision made by the competent corporate body, to increase the capital stock, distribute dividends and pay interest on shareholders'

equity, stock bonus or its derivatives or approve a split, and of referral to the CVM and publication of the respective notices or bulletins; and

- (d) within the period from 15 (fifteen) days prior to the disclosure of the Company's quarterly (ITR) and standardized financial statements (DFP) of the Company

§ 1 The restrictions set forth in letters "a" and "b" of this article shall cease to exist as soon as the Company discloses the material fact to the market, unless the trading with the shares may interfere with the conditions of said business, to the detriment of the Company's shareholders or the Company itself.

§ 2 The restrictions set forth in letters "a" and "b" of this article do not apply to the acquisition of shares held in treasury, through private negotiation, arising from the exercise of a call option under the call option plan approved at a shareholders' meeting, and do not apply to trading conducted on the basis of an Individual Trading Plan, pursuant to the provisions of Chapter IV of this Policy and in Exhibit II.

§ 3 The execution by the Company of purchases subject to a share buyback program for sale, cancellation or maintenance in treasury does not prevent the trading, directly or indirectly, of securities issued by the Company itself and by Bound Parties.

§ 4 For the purposes of the provisions of article 5 above, indirect trading means any trading in which the Company or Bound Parties, as the case may be, although not conducting them on its/their behalf, have control and decision-making power over the trading.

§ 5 For purposes of the provisions of article 5 above and article 20 of CVM Instruction 358/02, indirect trading operations are not trading conducted by investment funds of which the Bound Parties and other persons mentioned in this Policy are shareholders, provided they are not exclusive investment funds and the trading decisions of the manager of the investment fund cannot be influenced by the shareholders.

§ 6 The trading of securities issued by the Company by Bound Parties during non-trading periods, or in the event of non-trading cases, as provided for in this Trading Policy, may exceptionally be authorized by the Company's Executive Board, upon request submitted in writing containing the rationale of the need for trading.

§ 7 The restrictions provided for in this Policy apply to securities lending transactions carried out by Bound Parties.

Article 6 The same restriction to trading with securities issued by the Company applies to the following, provided they have knowledge of a material act or fact not yet disclosed:

- (a) those who have any commercial, professional or confidence relationship with the Company, such as independent auditors, analysts of securities, consultants and institutions integrating the distribution system, who are responsible for checking the disclosure of information before trading the securities issued by the Company or referring to them. and
- (b) managers who withdraw from the Company's management prior to public disclosure of a business or fact started during their term of office, up to 6 (six) months after their removal or until the material fact is disclosed to the market, whichever occurs first.

Article 7 The following persons are equally prevented from trading:

- (a) managers of portfolios and investment funds, companies or other institutions or entities of which the Bound Parties are the sole shareholders or shareholders, or in which they may influence the trading decisions;
- (b) any legal entity controlled directly or indirectly by Bound Parties; and
- (c) any person who has had access to information relating to a material act or fact through any of the Bound Parties and persons barred from trading, such as, but not limited to, their spouses, partners and descendants.

§ 1 For the purposes of the provisions set forth in item (c) above, the Bound Parties undertake to make their spouses, partners and descendants aware of this Policy.

§ 2 In order to ensure the foregoing, the Bound Parties shall inform the Company's DRI of those that have had access to information regarding the Company's material fact not yet disclosed, and shall use their best efforts so that they can sign an instrument of adhesion to the Company's Trading Policy.

Article 8 It is forbidden to the Board of Directors to decide on the acquisition or disposal of shares issued by the Company, as long as information relating to the following is not made public by means of publication of material fact:

- (a) entering into any contract or agreement for the transfer of shareholding control of the Company;
- (b) granting of option or proxy for the purpose of transferring shareholding control of the Company; or
- (c) when the merger, total or partial spin-off, consolidation, corporate conversion or reorganization is intended.

Sole Paragraph If, after Company's approval of a share buyback program, any of the events referred to in this article 8 occur, the Company shall suspend operations with shares issued by the Company, until the respective material fact is disclosed.

CHAPTER IV OPTIONAL INDIVIDUAL TRADING PLAN

Article 9 Individual Trading Plan is understood as the individual plans for the trading of securities issued by the Company, which may be prepared in writing by any of the Bound Parties, and through which such parties show their intention to invest with their own resources or disinvest, in the long term, in securities issued by the Company.

Article 10 Subject to the restrictions set forth in letters "c" and "d" of article 5, the Bound Parties are allowed to trade securities issued by the Company, provided the trading is carried out based on an Individual Trading Plan, previously filed at Company's headquarters, with DRI. For this purpose, the Individual Trading Plan must be filed in the company for more than 6 (six) months, including any amendments.

§ 1 The Individual Trading Plan cannot be filed or amended pending a material act or fact of which the interested party is aware.

§ 2 The DRI may refuse to file with the Company the Individual Trading Plan that is in disagreement with this Policy, with the applicable legislation or with the provisions of the Company's shareholders' agreements, if any.

Article 11 The Individual Trading Plan must indicate whether they are an investment or divestment plan, and the approximate volume of funds that the investor intends to invest, or the approximate number of securities to be traded, within the term of validity established in the Individual Trading Plan, which cannot be less than 12 (twelve) months, and at the end of which the interested party must submit a brief report on the respective development.

Sole Paragraph Securities acquired under the Individual Trading Plan cannot be sold before 60 (sixty) days from the date of their acquisition, it is understood that during the period of 60 (sixty) days the shareholding position cannot be lower than the amount acquired under the Individual Trading Plan, counted from the referred to acquisition.

CHAPTER V
OBLIGATION TO INDEMNIFY

Article 12 The Bound Parties responsible for non-compliance with any provision of this Trading Policy undertake to fully indemnify the Company and/or other Bound Parties for any losses they might incur, arising directly or indirectly from such non-compliance.

CHAPTER VI
GENERAL PROVISIONS

Article 13 This Trading Policy shall enter into force upon its approval by the Board of Directors, and shall remain in force for an indefinite period, pending a decision to the contrary. Any changes to this Trading Policy must be approved by the Board of Directors, and sent to CVM and Stock Exchanges.

Article 14 This Policy may not be amended, pending the disclosure of a material act or fact.

Article 15 This Trading Policy binds all of its signatories.

Article 16 The list of persons that have adhered to this Trading Policy shall be maintained at the Company and at the disposal of the CVM.

Article 17 All persons who have adhered to this Trading Policy commit themselves to the Company to update their registration information with the Human Resources Department, within a maximum period of 30 (thirty) business days, counted from the event giving rise to such update.

* * *

EXHIBIT I - INSTRUMENT OF ADHESION TO THE SECURITIES TRADING POLICY ISSUED BY LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.

I, _____, [nationality], [profession]. [marital status], bearer of identity card (RG) no. [•] and enrolled with the National Corporate Taxpayers' Register (CNPJ/MF) under no. [•], resident and domiciled at [•], in the capacity of [position] of **LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.**, a publicly-held company with registered office at Avenida Professor Mario Werneck, no. 621 - Belo Horizonte - MG - Postal Code (CEP) 30455-610, enrolled with the CNPJ under no. 09.041.168/0001-10, by this instrument and in accordance with the law, I DECLARE to have received, on this date, a full copy of the Securities Trading Policy issued by Log Commercial Properties e Participações S.A., and undertake to fully comply with the rules and procedures set forth in said Trading Policy.

The declarant executes this Instrument of Adhesion in 02 counterparts of equal content and form.

Belo Horizonte, [month] [day], 201[•]

[Name and signature]

EXHIBIT II - INDIVIDUAL PLAN FOR TRADING OF SECURITIES ISSUED BY LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.

1. INFORMATION OF THE DECLARANTS

Name:			
Position held in Log Commercial Properties e Participações S.A.:			
Marital Status:	Nationality:	Profession:	CPF/MF:
Identity Card:	Issued by:	Issuance Date:	
Address:			

2. QUANTITY/VALUE AND CHARACTERISTICS OF THE SECURITIES THAT THE DECLARANT INTENDS TO ACQUIRE/SELL DURING THE VALIDITY OF THIS PLAN, DIRECTLY OR INDIRECTLY

Quantity/Value	Type*	Kind**	Acquisition/Divestiture	Holder***

*Type: inform the type of securities to be acquired/divested (shares, bonuses, etc.)

**Kind: inform if they are common or preferred shares; series of bonus, etc.

***Holder: if it is the declarant, their spouse or dependent.

3. FORM OF ACQUISITION / DIVESTITURE

If trading will be conducted through a brokerage firm, inform the broker's name.

4. PERIODS IN WHICH THE DECLARANT PLANS TO TRADE

- On a monthly basis
- Every two months
- Every three months
- Every six months
- Once a year
- In the months of _____
- _____

5. ADDITIONAL INFORMATION (rationales, conditions and restrictions)

6. OTHER STATEMENTS

By this instrument, I undertake to:

- (i) comply with the set forth in this Individual Trading Plan;
- (ii) justify to the Company the cases of noncompliance;
- (iii) observe the periods of restriction on trading provided for in the Company's Trading Policy;
- (iv) not to trade securities acquired under this plan, for a minimum period of 60 (sixty) days from their acquisition; and
- (v) observe the validity of this plan and inform the Company, in writing, of any changes, amendments or termination thereof.

_____,
[Place and date]

[Signature]

To
Log Commercial Properties e Participações S.A.
Attn.: Chief Investor Relations Officer
Belo Horizonte, [month] [day], 201[•]

Ref. Individual Trading Plan

Considering the provisions in Chapter IV of the Securities Trading Policy issued by Log Commercial Properties e Participações S.A., dated [month] [day], 201[•] and considering my adhesion to said Policy, I hereby inform that I intend to invest, in the next 12 (twelve) months, around R\$ [•] ([•] reais) in shares issued by this Company, pursuant to the Individual Plan attached hereto.

Yours faithfully,

Name:
ID Card (RG):
CPF/MF:
Title:

RISK MANAGEMENT POLICY OF LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.

1. PURPOSE

1.1. This Risk Management Policy of LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A. ("Company" or "LOG"), approved at a meeting of the Board of Directors held on November 16, 2018 ("Policy"), seeks to set out the guidelines to make sure that all decisions, particularly those involving the management of risks inherent to the Company's business activities are made through a transparent process, in order to reduce the levels of exposure to losses by the Company.

2. APPLICATION

2.1. This Policy is applicable to all organizational levels of the Company that make up its risk management process, directly or indirectly.

2.2. All the professionals (including, but not limited to, employees and managers) that are part of the Company, which fail to comply with the rules set forth in this Policy are subject to a liability proceeding, subject to the provisions of item 9 of this Policy.

3. GUIDELINES AND PRINCIPLES

3.1. The Company is committed to a risk management dynamics, which helps preserve and develop the Company's values, assets and reputation, while keeping risks at acceptable levels. LOG's approach is to integrate risk management into your day-to-day business activities, by adopting the following precepts:

- Aligning the risk management process with the Company's strategy, corroborating the effort to build sustainable pillars for your business;
- Adopting assumptions set in good market practices, expressed in Brazilian and international regulations;
- To implement a structured risk management process, to ensure that risks and their impacts are taken into account in the decision-making process;
- To manage in an proactive and comprehensive manner the risks associated to business, management and support processes, keeping them at an exposure level in line with the Company's risk profile;
- To align corporate risk management actions among all areas and corporate bodies of the Company, covering all managers and professionals;
- To ensure autonomy in the risk management process and segregation of functions among risk takers, those responsible for the implementation of risk mitigation controls and those responsible for their monitoring; and
- To value transparency and accountability to all LOG stakeholders, on key risks and their initiatives to address them.

3.2. **Definition of risk:** Risk is an effect of uncertainty that can affect the achievement of objectives, which may lead to a positive deviation from the expected, representing an opportunity, or a negative deviation, representing a threat. Risks may represent uncertainties regarding the

achievement of business objectives at different levels of the Company, whether at strategic or operational level.

3.3. Types of risk: Company risks identified so far are classified as follows:

- **Strategic Risks:** Comprehensive risks that affect the Company in a systemic manner, and its occurrence can drastically affect its performance before the market and shareholders. Those risks are divided into the following categories:
 - *Conjuncture:* Risk arising from losses and changes in the political, cultural, social and economic or financial conditions in Brazil;
 - *Liquidity:* Risk of lack of resources to honor commitments taken due to the mismatch between assets and liabilities, which may result in loss due to the inability to perform a transaction within a reasonable time (cash);
 - *Interest rate:* Risk of fluctuations in the market interest rate may affect the value of the Company's liabilities, affecting its results and impacting its overall liquidity;
 - *Market:* Risk arising from the possibility of pressure for changes in the prices of LOG products and costs of consumables for the operation;
 - *Credit:* Risk of loss resulting from the uncertainty with regard to receipt by customers, financial institutions and guarantees of financial investments;
 - *Image:* Risk of loss resulting from the LOG brand being "worn out" in the market and/or the authorities, due to possible negative publicity, true or not;
 - *Legal:* Risk of loss resulting from fines, penalties or indemnities resulting from actions of supervisory and control bodies, as well as losses arising from unfavorable decision in legal or administrative proceedings;
 - *Operational:* Risk of loss due to failure, deficiency or ineffectiveness of internal processes, people and systems, or external events (ex.: weather factors).
- **Inherent Risks:** Risks related to the Company's core activity, including construction, leasing, sale and real estate development;
- **Operational Risks:** Less comprehensive risks, typically isolated in a department and/or process, not affecting LOG's performance before the market and shareholders.
- **Compliance Risks:** Risks related to the integrity of the Company and that may generate negative effects on its reputation, as well as affect compliance with external and / or internal laws and regulations to which the Company is subject. The degree of impact and probability may vary according to the risk. Compliance risks can also be classified as strategic or operational risks, depending on the case.

3.4. Risk management process: The Company is formally implementing risk matrix comprising its main corporate and compliance risks, based on their probability of occurrence and the magnitude of their impact on the Company's business, for which risk and performance indicators were selected for monitoring thereof. These indicators will be periodically evaluated by the Audit Committee and reported to the Board of Directors whenever they show signs of a threat to LOG's strategy and business. This risk matrix will be reviewed at least once a year by the Company, or at any time, considering the circumstances and the change in its magnitude of impact.

4. RESPONSIBILITIES

The Company's risk management structure has the structure described below:

4.1. The Board of Directors

- Sets forth the risk guidelines for the Company;
- Approves the Company's Risk Management Policy and its future revisions;
- Expresses its opinion on suggestions for change(s) to the operational structure of risk management, and approves any suggestions for changes, if deemed necessary;
- Supervises the Company's risk management and compliance activities;
- Operates and interacts with the Audit Committee, in order to ensure compliance with the set risk guidelines; and
- Periodically approves the risk matrix and its indicators.

4.2. The Executive Board

- Supports the decisions of the Board of Directors and of the Audit Committee with regard to risk mitigation;
- Implements the strategies and guidelines of the Company, approved by the Board of Directors, observing and making all other professionals observe their definitions;
- Provides resources for the implementation of effective internal controls and risk mitigation strategies;
- Assures a periodic schedule of training on conduct and ethics for Company's management and employees, together with the compliance area; and
- Maintains an environment of effective internal controls and compliance.

4.3. The Audit Committee

- Evaluates and monitors the Company's risk exposures;
- Monitors, requires and assures faithful fulfillment of: (i) laws and regulations applicable to Company's business and activities; (ii) the Code of Conduct; and (iii) internal rules, regulations, policies and manuals;
- Ensures the adequacy, strengthening and operation of the Company's internal control systems;
- Safeguards and disseminates the Company's commitment to management based on the pillars of corporate governance, sustainability and business ethics;
- Fights all forms of corruption;
- Issues recommendations regarding situations of potential conflict of interest between related parties of the Company;

- Identifies, evaluates, communicates, monitors and addresses the strategic, inherent and operational and compliance risks;
- Reports to the Board of Directors the results of the risk assessments; and
- Investigates complaints originating or not from the Confidential Channel, in an exempt manner, respecting the integrity of the complainant and of the subject of the complaint, pursuant to the Compliance Policy of the Company.

4.4. Finance Committee

- Evaluates and defines the financial strategies of the Company related to loans and funding, identifying possible financial risks to which the Company may be exposed; and
- Reports to the Board of Directors the results of the risk assessments.

4.5. Investments Committee

- Evaluates and defines the investments' strategies related to properties and other asset acquisitions, identifying any risks that can be related to potential investments of the Company, and
- Reports to the Board of Directors the results of the risk assessments.

4.6. Compliance Committee

- Evaluates issues of ethical dilemmas that may arise within LOG;
- Accompany, demand and monitor, together with the Audit Committee, for the faithful greeting: (i) laws and regulations applicable to the business and activities of LOG; (ii) of the Code of Conduct; and (iii) of the rules, regiments, policies and internal manuals;
- Combat all forms of corruption and/or favoring, together with the Audit Committee;
- Issues recommendations on situations of potential conflict of interest that could create a risk of compliance; and
- Analyzes, together with the compliance area, deviations of conduct and noncompliance with the internal regulations that may be identified/reported, either by the monitoring activities or by reporting from the Confidential Channel, reporting to the Audit Committee.

4.7. Advisory and Management

- It is incumbent upon the managers of Company's areas to ensure the operation of risk management, implementing preventive and corrective actions for the risks identified;
- To be proactive in identifying risks by always communicating them to the Audit Committee;
- They must contribute by providing information that supports the investigations carried out by the Audit Committee; and

- They develop processes and procedures, training and forms of communication that allow the consistent dissemination of risk management in the Company.

5. IDENTIFICATION OF RISKS

5.1. The strategic risks are identified through rounds of discussions with the Audit Committee and designees, as well as a benchmark with companies of similar size and market.

5.2. The operational and inherent risks are identified through the execution of audits in the processes, and the assessment of complaints with identification of fraud.

5.3. Compliance risks are identified through rounds of discussions with the Audit Committee and the Compliance Committee, as well as administrators in the business areas.

6. RISK ASSESSMENT

6.1. Risks are assessed according to the Audit Committee's own methodology. Once assessed, the risks are cataloged and classified according to their type of risk and degree of exposure. Operational risks are classified by degree: high, medium and low, considering two variables: **(i)** whether or not the risk is inherent; and **(ii)** whether or not there are deficiencies in controls that expose the Company to risk. Strategic risks are classified into a vulnerability scale ranging from 1 to 7, from the least to the most vulnerable.

6.2. Once assessed, the risks are cataloged and classified according to their type of risk and degree of exposure. Compliance risks are classified as high, medium and low considering two variables: **(i)** impact; and **(ii)** probability. A matrix of compliance risks and an action plan were developed with recommendations that should be revisited periodically.

7. TREATMENT OF RISKS

7.1. Risks may be accepted, as determined by the Board of Directors, not entailing the need to adapt processes and controls. When the risks are not accepted, it is necessary to adjust processes and controls for mitigation of risks.

7.2. For each strategic risk contingency processes are defined, so as to guarantee the continuity of the Company's business in case of exposure, minimizing any damages.

8. RISK REASSESSMENT

8.1. The assessed operational and compliance risks are reassessed, according to their degree classification. High risks are reassessed every 3 (three) months, medium every 6 (six) months, and low every 12 (twelve) months.

8.2. The strategic and inherent risks are reassessed every 6 (six) months, regardless of the vulnerability classification.

9. PENALTIES

9.1. Any breach of this Policy shall be submitted to the Company's Board of Directors, and any relevant penalties shall be applied, without prejudice to the penalties provided for in the current legislation.

10. DOUBTS

10.1. Any doubts or clarifications regarding the application of this Policy shall be sent to the Compliance area, by e-mail compliance@logcp.com.br, or telephone (31) 3615-8341.

11. GENERAL PROVISIONS

11.1. It shall be incumbent upon the Board of Directors to evaluate the adequacy of this Policy and make amendments whenever necessary.

11.2. This Policy is available on the Company's website (www.logcp.com.br/ri), as well as on the website of the Securities and Exchange Commission (www.cvm.gov.br).

11.3. This Policy shall enter into force upon its approval by the Board of Directors, and shall remain in force for an indefinite period, pending a decision to the contrary. Any amendments to this Risk Management Policy shall be approved by the Board of Directors.

* * *

MANAGERS COMPENSATION POLICY OF LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.

1. PURPOSE

1.1. This Managers Compensation Policy of LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A. ("Company"), approved at a Board of Directors meeting held on November 16, 2018 ("Compensation Policy") sets out the guidelines for determination of the compensation and benefits granted to statutory and non-statutory Officers, to the members of the Board of Directors, members of the Fiscal Council and to the members of the statutory and non-statutory Committees established by the Company, collectively referred to as ("Managers").

1.2. The Company's Compensation Policy considers three interrelated perspectives: (i) perspective of the employer: fostering the knowledge, skills and behaviors required for business success; (ii) perspective of the employee: compensation is an integral part of an attractive proposal of value that they understand and support; and (iii) perspective of costs: compensation costs are sustainable and do not compromise other investments.

2. COMPENSATION

2.1. **General Conditions:** The compensation of the Company's Managers may be composed as follows:

2.1.1. The Board of Directors

The members of the Board of Directors are not paid for the performance of their duties.

2.1.2. Executive Board appointed pursuant to the Articles of Incorporation

The compensation of the Company's Board of Officers is defined by the Shareholders' Meeting, and the Board of Directors is responsible for establishing its distribution, according to the functions and responsibilities and observing the provisions of the Company's Bylaws and its shareholders' agreements. The remuneration of the statutory Board of Officers of the Company considers the remuneration of other executives of the commercial property industry, and the collective performance of the executive management team to achieve the Company's objective of increasing the value of its shares.

Statutory Officers, in addition to the fixed monthly compensation paid as *pro labore*, receive a variable compensation linked to their performance and conditioned to the fulfillment of certain goals in their area. It was also granted stock options to be exercised within the terms and conditions set forth in the Company's Stock Option Plan, approved at the Special Shareholders' Meeting held on November 17, 2010 ("Stock Option Plan").

Therefore, the compensation of the Executive Board comprises the following: (i) base compensation and variable compensation, related to goals according to the position and area of the manager; (ii) an indirect compensation, represented by the benefits; and (iii) stock-based compensation, arising from the options granted under the Stock Option Plan.

This policy reconciles short-, medium- and long-term goals.

2.1.3. Executive Board not appointed pursuant to the Articles of Incorporation

The compensation practice seeks to hire and retain highly-qualified professionals in the company's management. The compensation policy of the Executive Board non-statutory is established according to the applicable legislation. All professionals are hired under the Consolidation of Labor Laws (CLT), focused on the search for results in the determination of the compensation of each Officer. In addition, the members of the Executive Board have stock-based compensation, conferred under the Company's Stock Option Plan.

Therefore, the compensation of the Executive Board not appointed pursuant to the Articles of Incorporation comprises the following: **(i)** base compensation and variable compensation, related to goals according to the position and area of the manager; and **(ii)** an indirect compensation, represented by the benefits; **(iii)** stock-based compensation, arising from the options granted under the Stock Option Plan.

2.1.4. Committees

The position of member of any of the Company's Committees is not paid.

2.1.5. Fiscal Council

The remuneration of the members of the Fiscal Council shall be attributed by the Shareholders' Meeting that appoints them, in accordance with the applicable legislation.

2.2. Compensation Breakdown: Please find below the description of the elements that make up the compensation and its objectives:

2.2.1. Base compensation

Corresponds to the base salary and aims at recognizing and reflecting the value of the position internally (Company) and externally (market).

2.2.2. Variable compensation

Corresponds to the profit sharing and aims at rewarding employees for achieving and exceeding the goals of the Company, areas and individual goals, aligned with the budget, strategic planning and competition.

2.2.3. Benefits

Corresponds to the life insurance, medical care and private pension plan, and aims at complementing welfare benefits.

2.2.4. Long-term incentives

Corresponds to the Stock Option Plan and aims at reinforcing employee retention and aligning interests with shareholders in the addition of value to the business in a sustainable and long-term manner.

2.3. The overall compensation of the members of the Executive Board and of the Board of Directors shall, in any case, observe the limits set out by the Shareholders' Meeting of the Company, pursuant to article 152 of Law No. 6,404, dated December 15, 1976, as amended.

3. APPRAISAL OF THE POLICY

3.1. It shall be incumbent upon the Board of Directors to evaluate the adequacy of this Company's Compensation Policy and make amendments whenever necessary. These evaluations are made through market surveys conducted with companies of the same size, from different segments and operating in Brazil.

4. GENERAL PROVISIONS

4.1. This Compensation Policy is available on the Company's website (www.logcp.com.br/ri), as well as on the website of the Securities and Exchange Commission (www.cvm.gov.br).

4.2. This Compensation Policy shall enter into force upon its approval by the Board of Directors, and shall remain in force for an indefinite period, pending a decision to the contrary.

* * *

INTERNAL REGULATIONS OF THE BOARD OF DIRECTORS OF LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.

INTERNAL REGULATIONS

Article 1 - These Internal Regulations, approved at a meeting of the Board of Directors held in November 16, 2018 ("Internal Regulations") regulate the operation, responsibilities, powers and attributions of the Board of Directors ("Board") of LOG Commercial Properties e Participações S.A. ("Company").

PRINCIPLES

Article 2 - In the exercise of its functions, the Board shall act in strict accordance with the Company's mission and values and conduct its work in accordance with the best corporate governance practices, the provisions of Law No. 6404 of December 15, 1976, ("Corporations Law"), the regulations issued by the Brazilian Securities and Exchange Commission ("CVM"), the Novo Mercado Regulation of B3 S.A. - Brasil, Bolsa, Balcão ("B3"), in effect as of January 2, 2018 ("Novo Mercado Regulation"), the Articles of Incorporation and shareholders' agreement of the Company.

POWERS

Article 3 - The Board is an administrative and joint decision-making body, which is primarily responsible for setting the general direction of the Company's business, as well as controlling and supervising its performance. The operation of the Board must be governed by the following guidelines:

- (i) making sure the Company's corporate purpose is achieved and assuring compliance with its limits
- (ii) safeguarding Company's values and purposes, and defining its strategic guidelines, including strategic planning and annual budget;
- (iii) making sure that the strategies and guidelines are effectively implemented by the Executive Board, continuously supporting and supervising the management of Company's business, including risks and persons, without interfering with operational matters;
- (iv) safeguarding the interests of the shareholders, taking into account the interests of other stakeholders, monitoring their relationship with them;
- (v) assurance of Company's longevity, within a sustainability perspective, which incorporates economic, social, environmental and good corporate governance considerations in the definition of business and operations;
- (vi) making sure that the Company's Executive Board adopts an agile management structure, consisting of qualified and reputable professionals, compatible with the Company's business segments; and
- (vii) making sure that the Executive Board adopts processes for prevention and management of situations of conflict of interest or divergence of opinions, so that the interests of the Company always prevail.

Article 4 - The Board shall approve the Company's Policies, including those determined by law and the applicable regulations, which shall be of a public nature, unless they place the Company's legitimate interest at risk.

Sole Paragraph - The Board shall establish the review and update cycles of each Policy it approves.

Article 5 - In the exercise of the powers provided for in article 23 of the Company's Articles of Incorporation, and without prejudice to provisions arising from shareholders' agreements of the Company, if any, the following is incumbent upon the Board:

- (i) approval of and/or any change to the Company's Business Plan;
- (ii) approval of annual operational and investment budgets and checking of compliance therewith;
- (iii) appointment and removal of the Executive Board members and determination of their powers, functions and compensation;
- (iv) control of the Officers' management, checking, at any time, of the Company's books and documents, request for information on contracts entered into or to be executed, and any other matters related to the Officers' management;
- (v) call for the Shareholders' Meeting when deemed convenient;
- (vi) statement about the management report and the accounts of the Executive Board, and submittal of the Financial Statements of the Company for approval at the Shareholders' Meeting;
- (vii) evaluation and approval of any transactions conducted directly or indirectly with related parties ;
- (viii) acquisition, divestiture and/or encumbrance of any interest in the capital stock, except for the organization of legal entities controlled by the Company, which have been organized in the form of a special purpose company for the implementation of one or more real property projects of the Company;
- (ix) any divestiture or encumbrance of the Company's real estate, the value of which the transaction exceeds R\$ 50,000,000.00 (fifty million reais);
- (x) any divestiture or encumbrance of other assets of the Company, the value of which exceeds, in one or more operations of the same type, within the period of 12 (twelve) months, the amount of R\$ 50,000,000.00 (fifty million reais);
- (xi) retaining of service providers whose annual compensation exceeds the amount of R\$ 15,000,000.00 (fifteen million reais), unless the retaining thereof has already been approved in the Annual Budget;
- (xii) granting and obtaining loans, financing and/or discounts of trade notes or securitization of receivables, value of which exceeds the amount of R\$ 50,000,000.00 (fifty million reais);
- (xiii) practice of any other acts and signature of any documents that bind the Company and/or release third parties from their responsibilities to the Company, involving amounts exceeding, in one or more transactions, within any period of 12 (twelve) months, the amount of R\$ 10,000,000.00 (ten million reais), except for the acquisition of land by the Company;
- (xiv) appointment and removal of independent auditors, which must be registered with the

- CVM and conduct an annual audit with a quarterly review of the Company;
- (xv) resolution on the acquisition of shares issued by the Company, for purposes of cancellation or holding in treasury, as well as on resale or new placement in the market, subject to the rules issued by the CVM and all other applicable legal and regulatory provisions;
 - (xvi) resolution on the issuance of debt securities in the international market for public or private distribution, and decision on the terms and conditions of the issue;
 - (xvii) resolution on the issuance of commercial papers for public distribution in Brazil or abroad, and decision on the terms and conditions of the issue;
 - (xviii) resolution on the issuance of debentures, including convertible debentures, for public or private distribution, and decision on the terms and conditions of the issue, pursuant to article 59, §§ 1 and 2 of the Corporations Law, and article 6, § 2 of the Articles of Incorporation;
 - (xix) proposing to the Shareholders' Meeting the statement of interim dividends, as well as interest on shareholders' equity, pursuant to the Corporations Law and other applicable laws;
 - (xx) approval of the granting by the Company of sureties, bonds, endorsements and other forms of guarantee in favor of third parties, except for those whose purpose is to guarantee obligations taken by the Company or its affiliates, subsidiaries and related to the fulfillment of the Company's corporate purpose; and
 - (xxi) the manifestation, favorable or otherwise, of any public tender offer ("IPO") for the shares issued by the Company, by means of a prior informed opinion, disclosed within fifteen (15) days of the publication of the public tender offer, which should address at least: (i) the convenience and timing of the OPA regarding the interest of all shareholders and the liquidity of the securities held by them; (ii) the repercussions of the OPA on the Company's interests; (iii) the strategic plans disclosed by the offeror in relation to the Company; and (iv) other points that the Board of Directors considers pertinent, as well as the information required by the applicable rules established by the CVM.

COMPOSITION, TERM OF OFFICE AND INVESTITURE

Article 6 - The Board of Directors shall be composed of at least 03 (three) and at most 09 (nine) effective members and for at least 01 (one) and at most 09 (nine) alternate members, elected by the Shareholders' Meeting, whose terms of office shall be unified and last for 02 (two) years, counted from the date of election, and with the possibility of reelection.

Article 7 - Of the members of the Board of Directors, at least 02 (two) or 20% (twenty percent), whichever is greater, shall be Independent Directors, as defined in the Novo Mercado Regulation, and the characterization of those appointed to the Board as Independent Directors shall be decided at the Shareholders' Meeting that elects them.

§ 1 - When, as a result of the calculation of the percentage referred to in the paragraph above, the result generates a fractional number of Directors, the Company shall proceed to the rounding up to the next higher whole number.

§ 2 - It shall be included in the management's proposal regarding the Shareholders' Meeting that elect the Board members, its opinion with regard to (i) the adhesion of each candidate to the position of Board member to the Company's Managers Appointment Policy; and (ii) the reasons, in light of the

provisions of the Novo Mercado Regulations and the statement provided for in article 17, which establishes the qualification of each candidate as Independent Director.

Article 8 - The Board members shall be invested in their respective positions by signing an Instrument of Investiture, which shall be available to the Directors immediately after their election and which shall include their subjection to the arbitration clause of the Articles of Incorporation and shall comply with the rules set out in the Novo Mercado Regulation, the Articles of Incorporation and Internal Regulations, Policies and Code of Conduct of the Company. The Directors must also provide a statement of qualification for the exercise of the position, pursuant to the Corporations Law, which may be made in their own instrument or in conjunction with the Instrument of Investiture, which shall be filed at Company's headquarters.

§ 1 - Notwithstanding the provisions set forth in the head provision of this article 8, the Directors hereby undertake to execute any other documents necessary for their investiture, in accordance with the applicable legislation and the Company's internal standards.

Article 9 - The appointment of members of the Company's Board of Directors, including independent members, shall consider the following criteria, in addition to the legal and regulatory requirements, and those expressed in the Company's Articles of Incorporation, the Managers Appointment Policy, Company's Conduct Code and Novo Mercado Regulation:

- (i) The number of positions to be filled, and the current composition of the Board;
- (ii) The strategy and objectives of the Company and the Board;
- (iii) The complementarity and diversity of experiences, considering the other Board members, academic formation, availability of time for the performance of the function, ethics, diligence, competence, previous experiences and professional trajectory, knowledge of the corporate governance standards and the fiduciary responsibilities pertaining to management members, unblemished reputation, personal, moral and professional integrity, independence, area of expertise, ability to aggregate and contribute, and corporate experience; and
- (iv) Availability of time to perform the duties as a member of the Board of Directors and appropriately dedicate themselves to the position and responsibility taken.

Article 10 - In case of vacancy of the position of any Board member, the alternate shall be appointed by the remaining Directors and shall serve until the first subsequent Shareholders' Meeting. In case of vacancy of the majority of the positions, a Shareholders' Meeting shall be called so that a new election may be held. For purposes of this article, a vacancy occurs with removal, death, resignation, proven impediment or disability. In case of absence or temporary impediment of any member of the Board of Directors, the respective alternate shall take over the functions during the absence or temporary impediment.

RIGHTS AND OBLIGATIONS

Article 11 - The Directors shall have access to all documents and information deemed necessary for the performance of their duties, except for questions of conflict of interest. Requests for documents or information should preferably be made in writing, addressed to the Chief Executive Officer or to the Investors' Relation Officer, which shall be responsible, where appropriate, for disclosing the same information to the other Directors.

Sole Paragraph - If a conflict of interests is identified in relation to a specific resolution, the Board member involved shall not receive any document or information on said matter, and shall withdraw from the discussions, without neglecting their legal duties.

Article 12- The Directors may, when they deem it necessary, propose the hiring by the Board of external experts, to assist them in specific decisions, in observance of the powers attributed to them by the Company's Articles of Incorporation.

Article 13- It is the obligation of all Directors, in addition to those provided for in the Corporations Law, the applicable regulation, Company's Conduct Code and the Articles of Incorporation:

- (i) acting in the Board seeking to add value to the Company and in defense of the shareholders' long-term interests;
- (ii) attending meetings of the Board and of the Committees to which they are a party, duly prepared, by examining the documents made available, actively and diligently participating in them;
- (iii) maintaining the confidentiality of Company's information to which they have access due to the exercise of the position, and requiring the same confidential treatment of the professionals who advise him, using said information only for the exercise of their functions as advisor, under penalty of answering for the act that contributed to its undue disclosure;
- (iv) declaring, prior to the resolution that, for any reason, they have a particular interest conflicting with that of the Company in relation to a certain matter submitted for their review, refraining from its discussion and vote;
- (v) assuring the adoption of and compliance with good corporate governance practices by the Company.
- (vi) informing, upon taking up the position and on a monthly basis to the Chief Investor Relations Officer of the Company, the quantity, characteristics and trading of securities issued by the Company of which they are the holder, or those of their spouse, partner and of the dependents included in the annual income tax return, and of companies directly or indirectly controlled by them, and they must inform the stock movement, if any, within 5 (five) days from the trading, mentioning the date, quantity, characteristics, and form and price of purchase and/or sale of shares, being certain that such information shall be provided to the CVM, pursuant to CVM Instruction no. 358/2002 and its amendments;
- (vii) refraining from any kind of direct or indirect advantage because of the position they occupy;
- (viii) making sure that the Board's relationship with the Committees, the Executive Board, the independent auditors and the shareholders occurs in an efficient and transparent manner; and
- (ix) communicate the Company of their participation in the Board of Directors, Committees or other corporate bodies of other companies, at the time of their election or resignation/removal.

MEETINGS OF THE BOARD OF DIRECTORS

Article 14 - The Board of Directors shall meet ordinarily every 03 (three) months and, extraordinarily, whenever convened by its Chairperson or by any of its members, by means of a written notice delivered at least 10 (ten) business days in advance, which shall include the agenda.

§ 1 - Meetings shall be admitted by means of teleconferencing or videoconferencing, with recording and transcription thereof allowed. Such participation shall be deemed a personal presence at said meeting. In that case, members of the Board of Directors who participate remotely in the Board meeting may cast their votes, on the date of the meeting, by means of a letter or facsimile or digitally certified e-mail.

§ 2 - As a matter of urgency, the meetings of the Board of Directors may be called by its Chairperson without observing the aforementioned period, provided that all other Board members are unequivocally aware of it. The calls may be made by letter, return receipt requested, fax or by any other means, electronic or not, which allows proof of receipt.

§ 3 - Irrespective of the formalities provided for in this article, a meeting of the Board of Directors shall be considered regular if all the Directors are in attendance.

Article 15 - The meetings of the Board of Directors shall be installed on first call with the presence of the majority of its members, and on second call with any number. The resolutions of the Board of Directors listed in article 5 above shall be taken by a favorable vote of the majority of the members in attendance, or who have cast their vote in the manner set forth in the Company's Articles of Incorporation, subject to any qualified quorums set forth in a shareholders' agreement filed at Company's headquarters.

Sole Paragraph - The Chairperson shall preside over the meetings of the Board of Directors and shall appoint the secretary. In the event of temporary absence or impediment of the Chairperson of the Board of Directors, the Vice-Chairperson shall preside these meetings or, if also temporary absent or impediment, other member of the Board of Directors appointed by the Chairperson shall preside these meetings.

COMMITTEES OF THE BOARD OF DIRECTORS

Article 16 - For better performance of its obligations, the Board of Directors may arrange for the creation of technical and advisory committees, with defined objectives and functions, consisting of members of the Company's management bodies or not.

Sole Paragraph - It shall be incumbent upon the Board of Directors to set the rules applicable to the committees, including rules on their composition, term of office, compensation and operation.

CHAIRPERSON AND VICE-CHAIRPERSON OF THE BOARD OF DIRECTORS

Article 17 - The Board of Directors shall have 1 (one) Chairperson and 1 (one) Vice-Chairperson, who shall be elected by a qualified majority of votes of the Directors in attendance, at the first meeting of the Board of Directors held immediately after the investiture of said members, or whenever there is any vacancy of said positions.

Sole Paragraph - The Vice-Chairperson shall exercise the functions of the Chairperson during his absences and temporary impediments, regardless of any formality. In case the Vice-Chairperson is absent or temporarily impeded, the role of the Chairperson shall be carried out by another Board

member appointed by the majority of votes of the other members of the Board of Directors and the Chairperson shall appoint the secretary of the meeting.

Article 18 -The Board Chairperson shall have the following attributions:

- (i) to convene, call to order and chair the Board meetings;
- (ii) to install and chair the Shareholders' Meeting;
- (iii) as Chairperson of the Shareholders' Meeting, to appoint a shareholder to act as Secretary, to assist them during the Shareholders' Meeting;
- (iv) to comply and cause compliance with these Internal Regulations;
- (v) to organize and coordinate the agenda of the meetings, if necessary, the other Directors, the Chief Executive Officer and other Officers of the Company;
- (vi) to coordinate the Board activities, with a view to ensuring the effectiveness and good performance of the Board and of each of its members, serving as a link between the Board and the Chief Executive Officer;
- (vii) to lead a structured and formal process of evaluation of the Board and its Committees - as joint committees - of the Board Chairperson, and the individual Directors, and the results of the Board's evaluation shall be disclosed to all Directors;
- (viii) to inform the Company's Chief Investor Relations Officer of the process of evaluation of the Board and its Committees, including information on the methodology used, in order to allow such information to be disclosed in a timely manner in the Company's Reference Form, in compliance with the provisions of the Novo Mercado Regulation;
- (ix) to reconcile the activities of the Board with the interests of the Company, its shareholders and other stakeholders;
- (x) to arrange for the call for Board meetings, informing the Directors and possible participants of the place, date, time and agenda; and to convene, whenever necessary, Company's Officers and/or employees to attend the meetings and provide clarifications or information on the matters under consideration;
- (xi) to make sure that the Directors receive full and timely information on the items on the agenda of the meetings;
- (xii) proposing to the Board the annual corporate calendar, which shall contain at least the dates of the events listed below:
 - a. Disclosure of the complete annual financial statements and standardized financial statements (DFP);
 - b. Disclosure of the quarterly information (ITR);
 - c. Holding of the Annual Shareholders' Meeting; and
 - d. Disclosure of the Reference Form.
- (xiii) to organize and coordinate, together with the Chief Executive Officer, upon the election of a new Board member, a program for induction and training of the new director, allowing them to get familiar with the activities and obtain information on the Company; and
- (xiv) to ensure that the Board resolutions are duly implemented by the Executive Board, and that the Company provides the information requested by the Directors, maintaining regular

control of relevant pending issues.

GENERAL PROVISIONS

Article 19 - The omissions of these Internal Regulations, doubts of interpretation and possible amendments to their provisions shall be decided at a Board meeting, as provided for in the Articles of Incorporation and these Internal Regulations.

Article 20 - These Internal Regulations shall enter into force on the date of their approval by the Board, and shall be filed at Company's headquarters.

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INTERNAL REGULATIONS OF THE AUDIT COMMITTEE OF LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.

INTERNAL REGULATIONS

Article 1º - These Internal Regulations, approved at a meeting of the Board of Directors held on November 16, 2018 ("Internal Regulations") govern the operation, responsibilities, powers and attributions of the Audit Committee not appointed pursuant to the Articles of Incorporation (non-statutory) of LOG Commercial Properties e Participações S.A. ("Company" and "Committee", respectively).

PRINCIPLES

Article 2 - The Committee, in the exercise of its functions, shall act in strict compliance with the Company's mission and values, and conduct its work in accordance with the best corporate governance practices, of the provisions of Law No. 6,404, dated December 15, as amended ("Corporations Law"), the regulations issued by the Brazilian Securities and Exchange Commission ("CVM"), the Novo Mercado Regulation of B3 S.A. - Brasil, Bolsa, Balcão ("B3"), in force as of January 2, 2018 ("Novo Mercado Regulation"), of the Articles of Incorporation and shareholders' agreement of the Company.

POWERS

Article 3 - The Committee is an advisory body linked to the Company's Board of Directors, upon which it is incumbent to:

- (i) recommend to the Board of Directors the hiring or dismissal of the Company's independent auditors for the preparation of an independent external audit or for any other service;
- (ii) manage and control the *Compliance* risks, supervise the activities of the (a) independent auditors, to assess: (1) their independence; (2) the quality of the services provided; and (3) their adequacy to Company's needs;
- (iii) supervise the areas (a) of internal controls; (b) internal audit; and (c) the preparation of the Company's financial statements, monitoring the effectiveness and adequacy of its structures and the integrity of the processes adopted, proposing recommendations for improvements to the Board of Directors, should it deem necessary;
- (iv) monitor and evaluate the quality and integrity of the (a) internal control mechanisms; (b) quarterly financial information, interim financial statements and the annual financial statements of the Company; (c) information and measurements disclosed on the basis of accounting and non-accounting data, which add elements not foreseen in the structure of the usual reports of the financial statements, proposing recommendations, if deemed necessary;
- (v) evaluate and monitor the risk exposures incurred by the Company, with powers to request detailed information on policies and procedures related to: (a) the compensation of the management; (b) the use of Company's assets; and (c) the expenses incurred on behalf of the Company;
- (vi) evaluate and monitor, in conjunction with management and the internal audit area, the adequacy of the transactions with related parties conducted by the Company and their respective evidence, pursuant to the Company's Policy of Transactions with Related Parties;

- (vii) prepare a brief annual report, to be submitted together with the Company's financial statements, containing the description (a) of the meetings held and the main matters discussed; (b) the activities, results and conclusions reached by the Committee, as well as its recommendations; and (c) any situations in which there is significant divergence among the management of the Company, the independent auditors and the Committee in relation to the Company's financial statements;
- (viii) evaluate, monitor, and recommend to the Company's Board of Directors the correction or improvement of the Company's internal policies;
- (ix) to interact with the Compliance Committee and the Company's Compliance area, whenever necessary, in accordance with the Compliance Policy and the Internal Regulations of the Compliance Committee of the Company; and
- (x) perform the other activities and functions assigned to the Committee by the Company's policies, internal regulations, manuals and codes.

Article 4 - It is incumbent upon each Committee member to:

- (i) Attend the meetings, when convened;
- (ii) Propose topics to be addressed by the Committee, within its scope;
- (iii) attend the Committee meetings duly prepared, having knowledge of all the topics and documents made available;
- (iv) have a conduct governed by high ethical standards, observe and encourage good corporate and compliance governance practices in the Company, and keep confidential any and all information to which they have access due to the exercise of their position, using it only for the performance of their obligations, under penalty of answering for any act that contributes to its undue disclosure;
- (v) declare, prior to the resolution, when, for any reason, they have a private or professional interest conflicting with those of the Company, in relation to a certain matter submitted for their consideration, refraining from discussing about and/or voting with regard to it; and
- (vi) maintain an impartial and ethical behavior in the performance of their activities.

Article 5 - In case the Fiscal Council is installed under the Corporations Law, the Committee shall retain its functions, in compliance with the powers granted by law and by the Company's Articles of Incorporation to the Fiscal Council.

COMPOSITION, TERM OF OFFICE AND INVESTITURE

Article 6 - The Committee shall be composed of at least 03 (three) members, appointed by the Board of Directors, whose terms of office shall be last for 01 (one) year, counted from the date of election, with possibility of reelection for successive terms, in observance of the maximum term of 10 (ten) years.

Sole Paragraph - The election of its members shall take place, preferably, at the meeting of the Board of Directors at which the Company's Executive Board is elected.

Article 7 - Among the members of the Committee, at least 01 (one) must be an independent member of the Board of Directors of the Company, as defined in the Novo Mercado Regulation, who does not participate in the Executive Board, and the majority of the members must be independent members.

The independent member of the Board of Directors may accumulate the characteristic of recognized experience in corporate accounting matters, pursuant to § 1 below.

§ 1 - Notwithstanding the provisions of the Novo Mercado Regulation, in order to comply with the independence criterion addressed in the head provision of this article, the Committee member (i) cannot be, or have been, in the last 05 (five) years (a) officer or employee of the Company, its parent company, subsidiary, affiliate or joint venture, direct or indirect; or (b) technical person in charge for the team involved in the Company's audit work; and (ii) cannot be a spouse, direct relative or next of kin up to the third degree, and relative by affinity, up to the second degree, of the persons referred to in item "i" of this paragraph.

§ 2 - At least 01 (one) of the members of the Committee must have recognized experience in corporate accounting matters, pursuant to the regulations issued by the CVM and the Novo Mercado Regulation, and must have (i) knowledge of generally accepted accounting principles and financial statements; (ii) ability to evaluate the application of those principles in relation to the main accounting estimates; (iii) experience in the preparation, audit, analysis or evaluation of financial statements that have a level of comprehensiveness and complexity comparable to those of the Company; (iv) educational formation compatible with the corporate accounting knowledge required for the activities of the Committee; and (v) knowledge of internal controls and corporate accounting procedures.

§ 3 - The term of office of Committee members, who are also members of the Company's Board of Directors shall automatically end upon termination of their respective term of office as a member of the Board of Directors.

§ 4 - It cannot be members of the Committee, the members of the Executive Board (i) of the Company; (ii) of its subsidiaries; (iii) of its controlling shareholders; (iv) of its affiliates; or (v) of companies under the same control, direct or indirect.

Article 8 - The Committee members perform a non-delegable function, which must be performed in observance of the principles of diligence and loyalty, as well as the obligations and responsibilities attributed to the Company's managers, pursuant to articles 153 to 159 of the Corporations Law, as provided for in article 160 of the same legal provision.

Sole Paragraph - Moreover, once a conflict of interest or private interest of any of the members of the Committee in relation to a certain matter on the agenda is identified, as set forth in article 4, item V above, such member shall inform the Coordinator of such fact, and if such member fails to do so, anyone present at the meeting who is aware of the fact shall do so. As soon as the conflict of interest or private interest has been identified, the Committee member cannot have access to information, pursuant to article 21 below, attend Committee meetings, cast a vote or otherwise intervene in matters with regard to which they have, directly or indirectly, a conflicting interest, until the conflict of interest ceases.

Article 9 - The members of the Committee shall maintain an impartial and skeptical attitude in the performance of their activities, and especially in relation to the estimates found in the financial statements, and to the Company's management.

Article 10 - The members of the Committee shall be vested in their respective positions upon signature of an Instrument of Investiture, in which the requirements to occupy the position, including their compliance with the requirements set forth in article 147 of the Corporations Law, shall be clearly informed. The Instruments of Investiture shall be filed at Company's headquarters and shall be at the disposal of the CVM for a period of 5 (five) years, counted from the last day of the Committee member's term of office.

Sole Paragraph - Notwithstanding the provisions set forth in the head provision of this article, the Committee members hereby undertake to execute any other documents necessary for their investiture, in accordance with the applicable legislation and the Company's internal standards.

Article 11 - Once the term of office of a member of the Committee has ended, regardless of the period served, the member may be appointed again to the position of member of said body only at least 3 (three) years from the end of their term of office.

Article 12 - Among the members of the Committee, the Board of Directors shall appoint a Coordinator, who shall represent the Committee, organize and coordinate its activities.

Sole Paragraph - The Coordinator of the Committee, accompanied by other members of said body, when necessary or convenient, shall (i) meet with the Board of Directors at least on a quarterly basis; and (ii) attend the Company's Annual Shareholders' Meeting.

Article 13 - In the event of vacancy, absence or temporary impediment of any Committee member, the Board of Directors shall meet within 30 (thirty) days, to appoint a replacement to perform the duties of the absent or impeded member, for the remaining term of office thereof, or elect a new member to fill in the position. The appointment of a new member shall not be necessary, if the number of remaining members in the Committee is equal to or greater than 03 (three) members.

Article 14 - The appointment of members of the Company's Committee, including independent members, shall consider the following criteria, in addition to the legal and regulatory requirements, and those expressed in the Company's Articles of Incorporation, the Managers Appointment Policy and the Novo Mercado Regulation:

- (i) The number of positions to be filled, and the current composition of the Committee;
- (ii) The strategy and objectives of the Company and of the Committee;
- (iii) The complementarity and diversity of experiences, considering the other Committee members, academic formation, availability of time for the performance of the function, ethics, diligence, competence, previous experiences and professional trajectory, knowledge of the corporate governance standards and the fiduciary responsibilities pertaining to management members, unblemished reputation, personal, moral and professional integrity, independence, area of expertise, ability to aggregate and contribute, and corporate experience; and
- (iv) Availability of time to perform the duties as a Committee member, and appropriately dedicate themselves to the position and responsibility taken as a result thereof.

Article 15 - In order to perform its functions effectively, the Committee shall have operational autonomy and annual or project budget allocation, within the limits approved by the Board of Directors, to conduct or determine the conduct of inquiries, evaluations and investigations within the scope of its activities. For this purpose, the Committee may also retain and use independent external experts.

COMMITTEE MEETINGS

Article 16- The Committee shall meet ordinarily every 02 (two) months, in such a way that the Company's accounting information is always evaluated before its disclosure, and extraordinarily whenever convened by the Coordinator or by any of its members, whenever necessary and by written notification, delivered at least 05 (five) days in advance, which shall include the agenda. The Committee meetings shall be held at Company's headquarters, and its members may participate, when necessary, via teleconference or videoconference.

§ 1 - The Committee may have an annual calendar of meetings, established at the first annual meeting of the Committee.

§ 2 - The Committee meetings shall be recorded in minutes.

§ 3 - The Committee meetings shall be chaired by the Coordinator and the secretary of the meetings shall be whomsoever the Coordinator may appoint. In the event of temporary absence of the Coordinator, the meetings shall be chaired by a Committee member chosen by a majority of the votes of the other members of said body, and the chairperson of the meeting shall appoint the secretary.

Article 17 - The Committee meetings shall be installed on first call with the presence of the majority of its members, and on second call with any number. The resolutions of the Committee shall be taken by a favorable vote of the simple majority of the members in attendance.

§ 1 - It shall be considered a member present at the meeting, the person that at the time: **(i)** is present physically at the place and date of the meeting; **(ii)** is duly represented by an attorney in fact duly empowered to participate in the meeting; **(iii)** participates in the meeting by teleconference or videoconference or by any other means that allows the other members to hear or see them; or **(iv)** has sent his/her vote in writing.

§ 2 - Irrespective of the formalities provided for in this article, a Committee meeting shall be considered regular if all the Committee members are in attendance.

PERIODIC REPORT TO THE BOARD OF DIRECTORS

Article 18 - The Committee has the obligation to report on a quarterly basis to the Board of Directors on the work and activities carried out in the period, and shall communicate any material facts and/or topics discussed.

Article 19 - The Committee will define the dates to report on its work to the Board of Directors, notwithstanding the obligation to report when and whenever requested by the Board of Directors.

CHANNEL OF COMPLAINTS

Article 20 - The Committee shall be the Company's body responsible for receiving and evaluating complaints and claims, including of a confidential nature, internal and external to the Company, filed through the Company's Confidential Channel, operated by a specialized company and whose contact information is available in the Company's Code of Conduct and Compliance Policy. The referred to Confidential Channel is totally secure and confidential, preserving the identity of the user and assuring their anonymity, avoiding any type of reprisal or punishment as a result of the use of the Confidential Channel. The Company currently shares the Confidential Channel with its controlling company, MRV Engenharia e Participações S.A., but is already taking all necessary steps to implement its own channel.

§ 1 - The Committee shall be responsible for determining the necessary and appropriate measures for investigation of the facts and information subject to the complaint, in an exempt manner, respecting the integrity of the complainant and the respondent.

§ 2 - The Compliance Committee analyzes, together with the Compliance area, deviations of conduct and noncompliance with the internal regulations that may be identified/reported, either by the monitoring activities or by reporting from the Confidential Channel, reporting to the Audit Committee.

§ 3 - The conclusions and recommendations of the Committee arising from the investigation of the complaints must be reported by the Coordinator to the Board of Directors.

ACCESS TO INFORMATION

Article 21 - The Committee members shall have access to all documents and information deemed necessary for the performance of their duties, except for issues of conflict of interest.

Sole Paragraph - If a conflict of interests is identified, the Committee member involved shall not receive any document or information on said matter, and shall withdraw from the discussions, without neglecting their legal duties.

GENERAL PROVISIONS

Article 22 - These Internal Regulations shall comply with the provisions contained in the shareholders' agreements filed at Company's headquarters.

Article 23 - These Internal Regulations may be reviewed whenever the majority of the members of the Committee and/or Board of Directors deem relevant, and the resulting amendment thereto shall be submitted to the Board of Directors for approval.

Article 24 - Any omissions in these Internal Regulations and doubts regarding the interpretation of their provisions shall be subject to analysis and decision by the Board of Directors.

Article 25 - These Internal Regulations shall enter into force on the date of their approval by the Board of Directors and shall be filed at Company's headquarters, and shall remain in force for an indefinite period, until such time as the Board of Directors decides otherwise.

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**INTERNAL REGULATIONS OF THE INVESTMENT COMMITTEE OF
LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.**

INTERNAL REGULATIONS

Article 1 - These Internal Regulations, approved at a meeting of the Board of Directors held on November 16, 2018 (“Internal Regulations”) governs the operation, responsibilities, powers and attributions of the Investment Committee (“Committee”), as an advisory and permanent body for advisory of the Board of Directors and the Executive Board of LOG Commercial Properties e Participações S.A. (“Company”).

PRINCIPLES

Article 2 - The Committee, in the exercise of its functions, shall act in strict compliance with the Company’s mission and values, and conduct its work in accordance with the best corporate governance practices, of the provisions of Law No. 6,404, dated December 15, as amended (“Brazilian Corporations Law”), the regulations issued by the Brazilian Securities and Exchange Commission (“CVM”), the Novo Mercado Regulation of B3 S.A. - Brasil, Bolsa, Balcão (“B3”), in force as of January 2, 2018 (“Novo Mercado Regulation”), of the Articles of Incorporation and shareholders’ agreement of the Company.

POWERS

Article 3 - The Committee is a joint body for advisory and guidance of the Board of Directors and the Executive Board of the Company, upon which the following is incumbent:

- (i) To monitor the execution of the Company’s annual budget, which contemplates the new investments projected, and propose changes and/or adjustments to the Board of Directors, when necessary;
- (ii) To propose to the Board of Directors the strategy for the development of new real estate investments of the Company, when requested;
- (iii) To request, if deemed necessary, the advisory of a professional or specialized company for securities or real estate matters, without prejudice to the independent audit; and
- (iv) To report periodically to the Board of Directors and to the Executive Board and submit its recommendations on matters under its charge.

COMPOSITION

Article 4 - The Committee shall be composed of at least 4 (four) and at most 6 (six) effective members, members of the Company’s management bodies or not, elected by the Board of Directors.

§ 1 - The election of its members shall take place, preferably at the meeting of the Board of Directors at which the Company’s Executive Board is elected, and their respective terms of office shall be of 1 (one) year, with the possibility of reelections.

§ 2 - It shall be incumbent upon the Chairperson of the Board of Directors of the Company to appoint a member, including himself/herself, to preside over the activities of the Committee.

§ 3 - The Committee members cannot delegate their functions. The members of the Committee shall perform their duties, in observance of the same duties and responsibilities attributed to the Company's managers, pursuant to articles 153 to 159 of Law No. 6,404/76, as amended ("Corporations Law"), as provided for in article 160 of the same legal provision. Furthermore, the members of the Committee shall refrain from acting in a situation of conflict of interest with the interests of the Company, without neglecting their legal duties, and which place the interests of the Company and of its shareholders ahead of their own.

§ 4 - In the event of vacancy, absence or temporary impediment of any Committee member, the Board of Directors shall meet within 30 (thirty) days, to appoint a replacement to perform the duties of the absent or impeded member, for the remaining term of office thereof, or elect a new member to fill in the position. The appointment of a new member shall not be necessary, if the number of remaining members in the Committee is equal to or greater than the minimum required in article 4 of these Internal Regulations.

§ 5 - The elected Committee members are prohibited from receiving, directly or indirectly, any type of compensation from the Company for the rendering of their services.

Article 5 - It is incumbent upon each Committee member to:

- (i) Attend the meetings, when convened;
- (ii) Propose topics to be addressed by the Committee, within its scope;
- (iii) Attend the Committee meetings duly prepared, having knowledge of all the topics and documents made available;
- (iv) Have a conduct governed by high ethical standards, observe and encourage good corporate governance practices in the Company, and keep confidential any and all information to which they have access due to the exercise of their position, using it only for the performance of their obligations, under penalty of answering for any act that contributes to its undue disclosure;
- (v) Declare, prior to the resolution, when, for any reason, they have a private or professional interest conflicting with those of the Company, in relation to a certain matter submitted for their consideration, refraining from discussing about and/or voting with regard to it; and
- (vi) maintain an impartial and ethical behavior in the performance of their activities.

OPERATION E CALL NOTICES

Article 6 - The Committee shall meet upon the call of its Secretary, and whenever necessary upon informed call of any of its members.

Article 7 - The Committee may have an annual calendar of meetings, established at the first annual meeting of the Committee.

Article 8 - The Committee meetings shall be held at Company's headquarters, and its members may participate, when necessary, via teleconference or videoconference.

Article 9 - The agenda of the meetings and the respective material shall be sent to the members of the Committee by the Secretary (as defined below) at least 5 (five) days prior to the meeting, and may be sent by e-mail.

Article 10- Any member of the Committee may call managers or employees of the Company to participate in the meetings for the purpose of providing clarifications.

INSTALLATION E RESOLUTIONS

Article 11 - In order for the meetings of the Committee to be installed and validly decide on the matters on the agenda, a simple majority of Committee members must attend the meeting, being considered in attendance the person that at the time: (i) is present physically at the place and date of the meeting; (ii) is duly represented by an attorney in fact duly empowered to participate in the meeting; (iii) participates in the meeting by teleconference or videoconference or by any other means that allows the other members to hear or see them; or (iv) has sent his/her vote in writing.

Sole Paragraph - Irrespective of the formalities provided for in this article, a Committee meeting shall be considered regular if all the Committee members are in attendance.

Article 12 - All resolutions of the Committee will be taken by a simple majority of its members and recorded on minutes, copies of which shall be sent to its members and to the Board of Directors.

COMMITTEE SECRETARY

Article 13 - The Board of Directors shall appoint a secretary for the Committee among the elected members (“Secretary”).

Article 14 - It shall be incumbent upon the Secretary, in addition to other attributions provided for in these Internal Regulations:

- (i) to organize the work program and the agenda of the Committee, ensuring the good performance of the Committee and each of its members;
- (ii) to prepare the agenda of the Committee meetings and call such meetings;
- (iii) to set methods and systems for monitoring the work related to the policies and recommendations defined by the Committee;
- (iv) to comply and cause compliance with the Internal Regulations;
- (v) to act as secretary of the meetings, prepare and draw up the respective minutes and collect, in an attendance list, the signatures of all the members of the Committee that participated in it, and record the attendance of any guests; and
- (vi) to file minutes and documents referring to the meetings.

PERIODIC REPORT TO THE BOARD OF DIRECTORS

Article 15 - The Committee shall periodically report to the Board of Directors on the work performed in the period, and inform any material facts and/or topics discussed.

Article 16 - The Committee will define the dates to report on its work to the Board of Directors, notwithstanding the obligation to report when and whenever requested by the Board of Directors.

CONFLICTS OF INTEREST

Article 17 - Moreover, once a conflict of interest or private interest of any of the members of the Committee in relation to a certain matter on the agenda is identified, as set forth in article 5, item V above, such member shall inform the Secretary of such fact, and if such member fails to do so, anyone present at the meeting who is aware of the fact shall do so. As soon as the conflict of interest or private interest has been identified, the Committee member cannot have access to information, attend Committee meetings, cast a vote or otherwise intervene in matters with regard to which they have, directly or indirectly, a conflicting interest, until the conflict of interest ceases.

BUDGET OF THE COMMITTEE

Article 18 - The Committee will not have its own budget. Any procurement of advisory services or others, as required in the performance of its duties, shall be approved by the Board of Directors.

FINAL PROVISIONS

Article 19 - These Internal Regulations shall comply with the provisions contained in the shareholders' agreements filed at Company's headquarters, if any.

Article 20 - These Internal Regulations may be reviewed whenever the majority of the members of the Committee and/or Board of Directors deem relevant, and the resulting amendment thereto shall be submitted for approval by the Board of Directors.

Article 21 - Any omissions in these Internal Regulations and doubts regarding the interpretation of their provisions shall be subject to analysis and decision by the Board of Directors.

Article 22 - These Internal Regulations shall enter into force on the date of their approval by the Board of Directors and shall be filed at Company's headquarters, and shall remain in force for an indefinite period, until such time as the Board of Directors decides otherwise.

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INTERNAL REGULATIONS OF THE FINANCE COMMITTEE OF LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.

INTERNAL REGULATIONS

Article 1 - These Internal Regulations, approved at a meeting of the Board of Directors held on November 16, 2018 ("Internal Regulations") governs the operation, responsibilities, powers and attributions of the Finance Committee ("Committee"), as an advisory and permanent body for advisory of the Board of Directors and the Executive Board of LOG Commercial Properties e Participações S.A. ("Company").

PRINCIPLES

Article 2 - The Committee, in the exercise of its functions, shall act in strict compliance with the Company's mission and values, and conduct its work in accordance with the best corporate governance practices, of the provisions of Law No. 6,404, dated December 15, as amended ("Brazilian Corporations Law"), the regulations issued by the Brazilian Securities and Exchange Commission ("CVM"), the Novo Mercado Regulation of B3 S.A. - Brasil, Bolsa, Balcão ("B3"), in force as of January 2, 2018 ("Novo Mercado Regulation"), of the Articles of Incorporation and shareholders' agreement of the Company.

POWERS

Article 3 - The Committee is a joint body for advisory and guidance of the Board of Directors and the Executive Board of the Company, upon which the following is incumbent:

- (i) To evaluate and define the Company's financial strategies related to loans and financing;
- (ii) To request, if deemed necessary, the advisory of a professional or specialized company for financial matters, without prejudice to the independent audit; and
- (iii) To report periodically to the Board of Directors and to the Executive Board and submit its recommendations on matters under its charge.

COMPOSITION

Article 4 - The Committee shall be composed of at least 3 (three) and at most 6 (six) effective members, members of the Company's management bodies or not, elected by the Board of Directors.

§ 1 - The election of its members shall take place, preferably at the meeting of the Board of Directors at which the Company's Executive Board is elected, and their respective terms of office shall be of 1 (one) year, with the possibility of reelections.

§ 2 - It shall be incumbent upon the Chairperson of the Board of Directors of the Company to appoint a member, including himself/herself, to preside over the activities of the Committee.

§ 3 - The Committee members cannot delegate their functions. The members of the Committee shall perform their duties, in observance of the same duties and responsibilities attributed to the Company's managers, pursuant to articles 153 to 159 of Law No. 6,404/76, as amended ("Corporations Law"), as provided for in article 160 of the same legal provision. Furthermore, the members of the Committee shall refrain from acting in a situation of conflict of interest with the interests of the

Company, without neglecting their legal duties, and which place the interests of the Company and of its shareholders ahead of their own.

§ 4 - In the event of vacancy, absence or temporary impediment of any Committee member, the Board of Directors shall meet within 30 (thirty) days, to appoint a replacement to perform the duties of the absent or impeded member, for the remaining term of office thereof, or elect a new member to fill in the position. The appointment of a new member shall not be necessary, if the number of remaining members in the Committee is equal to or greater than the minimum required in article 4 of these Internal Regulations.

§ 5 - The elected Committee members are prohibited from receiving, directly or indirectly, any type of compensation from the Company for the rendering of their services.

Article 5 - It is incumbent upon each Committee member to:

- (i) Attend the meetings, when convened;
- (ii) Propose topics to be addressed by the Committee, within its scope;
- (iii) Attend the Committee meetings duly prepared, having knowledge of all the topics and documents made available;
- (iv) Have a conduct governed by high ethical standards, observe and encourage good corporate governance practices in the Company, and keep confidential any and all information to which they have access due to the exercise of their position, using it only for the performance of their obligations, under penalty of answering for any act that contributes to its undue disclosure;
- (v) Declare, prior to the resolution, when, for any reason, they have a private or professional interest conflicting with those of the Company, in relation to a certain matter submitted for their consideration, refraining from discussing about and/or voting with regard to it; and
- (vi) Maintain an impartial and ethical behavior in the performance of their activities.

OPERATION E CALL NOTICES

Article 6 - The Committee shall meet upon the call of its Secretary, and whenever necessary upon informed call of any of its members.

Article 7 - The Committee may have an annual calendar of meetings, established at the first annual meeting of the Committee.

Article 8 - The Committee meetings shall be held at Company's headquarters, and its members may participate, when necessary, via teleconference or videoconference.

Article 9 - The agenda of the meetings and the respective material shall be sent to the members of the Committee by the Secretary (as defined below) at least 5 (five) days prior to the meeting, and may be sent by e-mail.

Article 10 - Any member of the Committee may call managers or employees of the Company to participate in the meetings for the purpose of providing clarifications.

INSTALLATION E RESOLUTIONS

Article 11 - In order for the meetings of the Committee to be installed and validly decide on the matters on the agenda, a simple majority of Committee members must attend the meeting, being considered in attendance the person that at the time: (i) is present physically at the place and date of the meeting; (ii) is duly represented by an attorney in fact duly empowered to participate in the meeting; (iii) participates in the meeting by teleconference or videoconference or by any other means that allows the other members to hear or see them; or (iv) has sent his/her vote in writing.

Sole Paragraph - Irrespective of the formalities provided for in this article, a Committee meeting shall be considered regular if all the Committee members are in attendance.

Article 12 - All resolutions of the Committee shall be taken by a simple majority of its members and recorded on minutes, copies of which shall be sent to its members and to the Board of Directors.

COMMITTEE SECRETARY

Article 13 - The Board of Directors shall appoint a secretary for the Committee among the elected members (“Secretary”).

Article 14 - It shall be incumbent upon the Secretary, in addition to other attributions provided for in these Internal Regulations:

- (i) to organize the work program and the agenda of the Committee, ensuring the good performance of the Committee and each of its members;
- (ii) to prepare the agenda of the Committee meetings and call such meetings;
- (iii) to set methods and systems for monitoring the work related to the policies and recommendations defined by the Committee;
- (iv) to comply and cause compliance with the Internal Regulations;
- (v) to act as secretary of the meetings, prepare and draw up the respective minutes and collect, in an attendance list, the signatures of all the members of the Committee that participated in it, and record the attendance of any guests; and
- (vi) to file minutes and documents referring to the meetings.

PERIODIC REPORT TO THE BOARD OF DIRECTORS

Article 15 - The Committee shall periodically report to the Board of Directors on the work performed in the period, and inform any material facts and/or topics discussed.

Article 16 - The Committee will define the dates to report on its work to the Board of Directors, notwithstanding the obligation to report when and whenever requested by the Board of Directors.

CONFLICTS OF INTEREST

Article 17 - Moreover, once a conflict of interest or private interest of any of the members of the Committee in relation to a certain matter on the agenda is identified, as set forth in article 5, item V above, such member shall inform the Secretary of such fact, and if such member fails to do so, anyone present at the meeting who is aware of the fact shall do so. As soon as the conflict of interest or private interest has been identified, the Committee member cannot have access to information,

attend Committee meetings, cast a vote or otherwise intervene in matters with regard to which they have, directly or indirectly, a conflicting interest, until the conflict of interest ceases.

BUDGET OF THE COMMITTEE

Article 18 - The Committee will not have its own budget. Any procurement of advisory services or others, as required in the performance of its duties, shall be approved by the Board of Directors.

FINAL PROVISIONS

Article 19 - These Internal Regulations shall comply with the provisions contained in the shareholders' agreements filed at Company's headquarters, if any.

Article 20 - These Internal Regulations may be reviewed whenever the majority of the members of the Committee and/or Board of Directors deem relevant, and the resulting amendment thereto shall be submitted for approval by the Board of Directors.

Article 21 - Any omissions in these Internal Regulations and doubts regarding the interpretation of their provisions shall be subject to analysis and decision by the Board of Directors.

Article 22 - These Internal Regulations shall enter into force on the date of their approval by the Board of Directors and shall be filed at Company's headquarters, and shall remain in force for an indefinite period, until such time as the Board of Directors decides otherwise.

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INTERNAL REGULATIONS OF THE MANAGEMENT AND ADVISORY COMMITTEE OF LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.

INTERNAL REGULATIONS

Article 1 - These Internal Regulations, approved at a meeting of the Board of Directors held on November 16, 2018 ("Internal Regulations") governs the operation, responsibilities, powers and attributions of the Management and Advisory Committee ("Committee"), as an advisory and permanent body for advisory of the Board of Directors and the Executive Board of LOG Commercial Properties e Participações S.A. ("Company").

PRINCIPLES

Article 2 - The Committee, in the exercise of its functions, shall act in strict compliance with the Company's mission and values, and conduct its work in accordance with the best corporate governance practices, of the provisions of Law No. 6,404, dated December 15, as amended ("Brazilian Corporations Law"), the regulations issued by the Brazilian Securities and Exchange Commission ("CVM"), the Novo Mercado Regulation of B3 S.A. - Brasil, Bolsa, Balcão ("B3"), in force as of January 2, 2018 ("Novo Mercado Regulation"), of the Articles of Incorporation and shareholders' agreement of the Company.

POWERS

Article 3 - The Committee is a joint body for advisory and guidance of the Board of Directors and the Executive Board of the Company, upon which the following is incumbent:

- (i) To assist in project approval processes with government agencies;
- (ii) To identify opportunities for new projects;
- (iii) Assist the constructive process; and
- (iv) To report periodically to the Board of Directors and to the Executive Board and submit its recommendations on matters under its charge.

COMPOSITION

Article 4 - The Committee shall be composed of at least 5 (five) and at most 6 (six) effective members, members of the Company's management bodies or not, elected by the Board of Directors.

§ 1 - The election of its members shall take place, preferably at the meeting of the Board of Directors at which the Company's Executive Board is elected, and their respective terms of office shall be of 1 (one) year, with the possibility of reelections.

§ 2 - It shall be incumbent upon the Chairperson of the Board of Directors of the Company to appoint a member, including himself/herself, to preside over the activities of the Committee.

§ 3 - The Committee members cannot delegate their functions. The members of the Committee shall perform their duties, in observance of the same duties and responsibilities attributed to the Company's managers, pursuant to articles 153 to 159 of Law No. 6,404/76, as amended ("Corporations Law"), as provided for in article 160 of the same legal provision. Furthermore, the members of the Committee shall refrain from acting in a situation of conflict of interest with the interests of the

Company, without neglecting their legal duties, and which place the interests of the Company and of its shareholders ahead of their own.

§ 4 - In the event of vacancy, absence or temporary impediment of any Committee member, the Board of Directors shall meet within 30 (thirty) days, to appoint a replacement to perform the duties of the absent or impeded member, for the remaining term of office thereof, or elect a new member to fill in the position. The appointment of a new member shall not be necessary, if the number of remaining members in the Committee is equal to or greater than the minimum required in article 4 of these Internal Regulations.

§ 5 - The elected Committee members are prohibited from receiving, directly or indirectly, any type of compensation from the Company for the rendering of their services.

Article 5 - It is incumbent upon each Committee member to:

- (i) Attend the meetings, when convened;
- (ii) Propose topics to be addressed by the Committee, within its scope;
- (iii) Attend the Committee meetings duly prepared, having knowledge of all the topics and documents made available;
- (iv) Have a conduct governed by high ethical standards, observe and encourage good corporate governance practices in the Company, and keep confidential any and all information to which they have access due to the exercise of their position, using it only for the performance of their obligations, under penalty of answering for any act that contributes to its undue disclosure;
- (v) Declare, prior to the resolution, when, for any reason, they have a private or professional interest conflicting with those of the Company, in relation to a certain matter submitted for their consideration, refraining from discussing about and/or voting with regard to it; and
- (vi) maintain an impartial and ethical behavior in the performance of their activities.

OPERATION E CALL NOTICES

Article 6 - The Committee shall meet upon the call of its Secretary, and whenever necessary upon informed call of any of its members.

Article 7 - The Committee may have an annual calendar of meetings, established at the first annual meeting of the Committee.

Article 8 - The Committee meetings shall be held at Company's headquarters, and its members may participate, when necessary, via teleconference or videoconference.

Article 9 - The agenda of the meetings and the respective material shall be sent to the members of the Committee by the Secretary (as defined below) at least 5 (five) days prior to the meeting, and may be sent by e-mail.

Article 10- Any member of the Committee may call managers or employees of the Company to participate in the meetings for the purpose of providing clarifications.

INSTALLATION E RESOLUTIONS

Article 11 - In order for the meetings of the Committee to be installed and validly decide on the matters on the agenda, a simple majority of Committee members must attend the meeting, being considered in attendance the person that at the time: (i) is present physically at the place and date of the meeting; (ii) is duly represented by an attorney in fact duly empowered to participate in the meeting; (iii) participates in the meeting by teleconference or videoconference or by any other means that allows the other members to hear or see them; or (iv) has sent his/her vote in writing.

Sole Paragraph - Irrespective of the formalities provided for in this article, a Committee meeting shall be considered regular if all the Committee members are in attendance.

Article 12 - All resolutions of the Committee shall be taken by a simple majority of its members and recorded on minutes, copies of which shall be sent to its members and to the Board of Directors.

COMMITTEE SECRETARY

Article 13 - The Board of Directors shall appoint a secretary for the Committee among the elected members (“Secretary”).

Article 14 - It shall be incumbent upon the Secretary, in addition to other attributions provided for in these Internal Regulations:

- (i) to organize the work program and the agenda of the Committee, ensuring the good performance of the Committee and each of its members;
- (ii) to prepare the agenda of the Committee meetings and call such meetings;
- (iii) to set methods and systems for monitoring the work related to the policies and recommendations defined by the Committee;
- (iv) to comply and cause compliance with the Internal Regulations;
- (v) to act as secretary of the meetings, prepare and draw up the respective minutes and collect, in an attendance list, the signatures of all the members of the Committee that participated in it, and record the attendance of any guests; and
- (vi) to file minutes and documents referring to the meetings.

PERIODIC REPORT TO THE BOARD OF DIRECTORS

Article 15 - The Committee shall periodically report to the Board of Directors on the work performed in the period, and inform any material facts and/or topics discussed.

Article 16 - The Committee will define the dates to report on its work to the Board of Directors, notwithstanding the obligation to report when and whenever requested by the Board of Directors.

CONFLICTS OF INTEREST

Article 17 - Moreover, once a conflict of interest or private interest of any of the members of the Committee in relation to a certain matter on the agenda is identified, as set forth in article 5, item V above, such member shall inform the Secretary of such fact, and if such member fails to do so, anyone present at the meeting who is aware of the fact shall do so. As soon as the conflict of interest or private interest has been identified, the Committee member cannot have access to information,

attend Committee meetings, cast a vote or otherwise intervene in matters with regard to which they have, directly or indirectly, a conflicting interest, until the conflict of interest ceases.

BUDGET OF THE COMMITTEE

Article 18 - The Committee will not have its own budget. Any procurement of advisory services or others, as required in the performance of its duties, shall be approved by the Board of Directors.

FINAL PROVISIONS

Article 19 - These Internal Regulations shall comply with the provisions contained in the shareholders' agreements, if any, filed at Company's headquarters.

Article 20 - These Internal Regulations may be reviewed whenever the majority of the members of the Committee and/or Board of Directors deem relevant, and the resulting amendment thereto shall be submitted for approval by the Board of Directors.

Article 21 - Any omissions in these Internal Regulations and doubts regarding the interpretation of their provisions shall be subject to analysis and decision by the Board of Directors.

Article 22 - These Internal Regulations shall enter into force on the date of their approval by the Board of Directors and shall be filed at Company's headquarters, and shall remain in force for an indefinite period, until such time as the Board of Directors decides otherwise.

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INTERNAL REGULATIONS OF THE COMPLIANCE COMMITTEE OF LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.

INTRODUCTION

Article 1 - LOG Commercial Properties e Participações S.A. ("LOG") is based on the premise that the performance of all its employees is guided by ethical and transparent actions, and for that reason has created a Compliance Structure and Compliance Program, to promote an ethical culture and establish safer businesses from a legal and operational perspective, in addition to complying with the applicable regulations.

First Paragraph - This Regulation, approved at a Board of Directors' meeting held on November 16, 2018 ("Regulation"), aims to present the performance of LOG's Compliance Committee ("Committee"), which is part of the Compliance structure, and to establish its responsibilities and scope of action.

Second Paragraph - The Committee, in the exercise of its functions, shall act in strict accordance with the mission and values of LOG and conduct its work in accordance with the best practices of corporate governance, of the provisions of Law 6404, dated December 15, 1976, as amended ("Corporation Law"), regulation issued by the Brazilian Securities and Exchange Commission ("CVM"), of the New Market Regulation of B3 SA - Brasil, Bolsa, Balcão ("B3"), effective January 2, 2018 ("Novo Mercado Regulation") , of the Bylaws and of the Company's shareholders' agreement.

NATURE AND PURPOSE OF THE COMMITTEE

Article 2 - LOG's Committee is an advisory and deliberative body that seeks to ensure the observance and compliance of the performance guidelines in view of the ethics and compliance management and risk management.

Article 3 - The Committee's purpose is to ensure compliance with the standards of conduct set forth in LOG's Code of Ethics and Conduct, Compliance Policy, Anti-Corruption Policy and other internal and external regulations.

Sole Paragraph - The report of the Committee is made directly to LOG's Board of Directors of LOG.

COMPOSITION OF THE COMMITTEE

Article 4 - The Committee shall be composed of at least three (3) members, elected by the Board of Directors, whose terms of office will last for one (1) year, as from the date of election, and they may be reelected for successive terms, for a maximum term of ten (10) years.

First Paragraph - The election of its members will take place, preferably, at the Board of Directors' Meeting which elects the LOG's Executive Board.

Second Paragraph - The Committee shall be permanent and shall consist of at least three members with voting rights: (i) the Chief Executive Officer, (ii) the Chief Financial and Investor Relations Officer, and (iii) the Chief Executive Officer without specific designation; and one non-voting participant member: (i) the Compliance Manager.

Third Paragraph - The Chief Financial Officer and Investor Relations Officer of LOG shall serve as the Committee Officer, while the Compliance Officer shall serve as the Committee Coordinator, both with

specific responsibilities under these Rules. When a Committee member is unable to attend a meeting, he or she shall notify the Coordinator in advance so that a new meeting date or format is defined.

Article 5 - The composition of the Committee will be reviewed every 2 (two) years by the Board of Directors, which has the authority to modify such structure at each term of office. It will be the responsibility of the Committee to convene the meeting with the Administrative Council to resolve on the renewal or not of the terms of office.

Article 6 - The members of the Committee will be invested in their respective positions by signing a Term of Investiture, which will state the requirements for filling the position, including their compliance with the requirements set forth in Article 147 of the Brazilian Corporations Law. The Terms of Investiture will be held at LOG's headquarters and may be accessed by the CVM for a term of five (5) years as of the last day of the term of office of the Committee member.

Sole Paragraph - All members of the Committee will sign the Confidentiality Agreement at the investiture in office (Exhibit B). Those invited for specific meetings should sign the same Confidentiality Agreement at each meeting. Such confidentiality terms will be filed by the Committee Coordinator.

Article 7 - Employees or representatives of LOG's other areas such as: Legal, Financial, Human Development, among others, and as required, may be called on an extraordinary basis, to provide information or clarifications needed for the situation under analysis.

Sole Paragraph - Members who act as invited members at the Committee's meeting do not have the right to vote.

Article 8 - The function of member of the LOG Committee is not delegable. The members of the Committee shall perform their duties respecting the same duties and responsibilities attributed to the directors of LOG, pursuant to Articles 153 to 159 of the Corporation Law, as provided in article 160 of the same legal provision. Furthermore, the members of the Committee must refrain from acting in a conflict of interest with the interests of the LOG, without neglecting their legal duties, and that they put the interests of LOG and the shareholders ahead of their own.

Article 9 - In the event of vacancy, absence or temporary impediment of any member of the Committee, the Board of Directors will meet within thirty (30) days to appoint a substitute to perform the duties of the absent or impeded member for the remaining term of office or elect a new member to fill the vacancy. There will not be the need to appoint a new member if it is confirmed that the number of remaining members of the Committee is equal to or greater than three (3) members.

Article 10 - The appointment of LOG Committee members will consider the following criteria, in addition to the legal and regulatory requirements and those expressed in LOG's Articles of Incorporation, the Administrators' Appointment Policy and the *Novo Mercado* Regulation:

- (i) The number of positions to be filled, as well as the current composition of the Committee;
- (ii) LOG's and the Committee's strategy and goals;
- (iii) The complementarity and diversity of experiences, considering the other members of the Committee, academic background, availability of time for the performance of the function, ethics, diligence, competence, previous experiences and professional career, knowledge of corporate governance norms and fiduciary duties required from management members, unblemished reputation, personal, moral and professional integrity, independence, area of expertise, ability to aggregate and contribute, and corporate experience; and

- (iv) Availability of time for performance of the duties as a member of the Committee and proper dedication to the function and responsibility assumed.

RESPONSIBILITIES OF THE COMMITTEE

Article 11 - In addition to proposing improvements in LOG's corporate governance system, the Committee has the following responsibilities:

- (i) Informing the Board of Directors on resolutions and decisions in view of the ethics, compliance and risk management;
- (ii) Evaluating ethics situations that may occur in LOG;
- (iii) To monitor, demand and supervise, together with the Audit Committee, for the faithful compliance with: (i) the laws and regulations applicable to LOG's business and activities; (ii) of the Code of Conduct; and (iii) internal rules, regiments, policies and manuals;
- (iv) Combat all forms of corruption and / or favoring, together with the Audit Committee;
- (v) Issue recommendations on situations of potential conflict of interest that could generate a risk of compliance;
- (vi) Analyze, together with the compliance area, deviations from conduct and noncompliance with internal regulations that may be identified/reported, either by the monitoring activities or by reporting from the Confidential Channel, reporting to the Audit Committee;
- (vii) Analyzing cases not foreseen in the Code of Conduct, the Compliance Policy and other internal and external regulations related to the Compliance Program;
- (viii) Managing the Code of Conduct in specific situations involving the Compliance area;
- (ix) Defining and monitoring the assessment flow of violations of the ethics and compliance management provisions;
- (x) Keeping the management report(s) of the Committee's activities updated to ensure effective follow-up of ongoing actions, recommendations and decisions;
- (xi) Clarifying doubts regarding the interpretation of ethics and compliance management standards;
- (xii) Participating, together with the compliance area, in the revision the Code of Conduct in annually basis and to suggest its updating to the Board of Directors whenever necessary;
- (xiii) Sugesting to the committes and responsables areas the amendment and updating of LOG's internal normatives such as their procedures; and
- (xiv) Enabling activities to strengthen ethical culture and compliance, when necessary.

Article 12 -The Committee Officer's main responsibilities are:

- (i) Ensuring that the functions of the Committee are met;
- (ii) Representing the Committee;
- (iii) Convening the Committee's meetings whenever necessary;

- (iv) Organizing and managing remote decisions;
- (v) Preparing the necessary reports to the Board of Directors regarding the activities of the ethics and compliance management, on a quarterly basis or whenever necessary/requested by the Board of Directors, and
- (vi) Preparing quarterly reports to the Audit Committee on conclusions and recommendations of the Committee resulting from the assessment of the complaints received.

Article 13 - The Committee Coordinator has the following main responsibilities:

- (i) Providing the Committee with the appropriate reports on the assessments and investigations of the complaints resulting from the Report Channel or from any other source that have been directed to the Committee;
- (ii) Managing the inquiries received by the Committee;
- (iii) Updating the management report(s) of the Committee's activities to ensure effective compliance with the actions, recommendations and decisions defined;
- (iv) Providing administrative support to the Committee and performing tasks established by the other members;
- (v) Managing the meeting schedule and convening regular and special meetings;
- (vi) Supporting the preparation and disclosure of the minutes among all participants;
- (vii) Distributing the necessary agenda and materials in password-protected files, for use in meetings, to the Committee's members, for analysis and prior reading;
- (viii) Controlling deadlines and conducting actions recommended by the Board of Directors or Committee and reporting to the Coordinator; and
- (ix) Performing the management of records, documents, databases and other papers related to the Compliance Committee, taking into account the confidentiality of the information.

Article 14 - The Committee coordinator will not have the right to vote within the Compliance Committee.

Article 15 - Members and invited members are responsible for:

- (i) Informing the Committee Coordinator of the impossibility of attending the meetings; and
- (ii) Complementing the agenda sent from the meeting with the respective suggestion of subjects and sending it to the Committee Coordinator.

OPERATION

Article 16 - The Committee's formal meetings will take place on a quarterly basis as of the launch of the Committee and the Compliance Program. Special meetings may be convened whenever necessary.

First Paragraph - The meetings will take place with the attendance of all participants. They may attend formal meetings through conference call, videoconference or any other electronic means of communication if it is not possible to attend in person.

Second Paragraph - In the case of remote operation, via the telephone or video conference, it is essential to ensure that the structure used guarantees the confidentiality of the information.

Third Paragraph - In submitting the most critical cases of noncompliance to the Board of Directors for resolution, the Committee will recommend the appropriate treatment of the situation. The recommendation of the Committee will be defined by means of a vote among its members.

Article 17 - Specific agendas for the Compliance Committee meetings should be established. They should cover topics related to risks such as: the monitoring of programs, projects and situations that may generate a high impact for LOG, identified through mappings, events, indicators, changes of the external and internal environment, reports through the Ethics Channel or even pointed out by the business areas.

First Paragraph - In addition, the Committee will establish agendas related to Compliance topics to be prepared based on reports of misconducts reported by the communication means, specific situations arising from the activities performed by the Compliance Area, or the monitoring of relevant actions, assessments or pertinent topics, as well as matters suggested by the members of the Committee.

Second Paragraph - The Committee Coordinator will send the agenda and other necessary materials to the Committee members and invited members (if any) in advance and receive suggestions of topics up to 2 days in advance of the meeting.

Third Paragraph - The following schedule for the execution of the Committee's meetings is suggested:

- (i) Opening;
- (ii) Reading of the pending matters pointed out in the previous minutes;
- (iii) Presentation of the agenda of the day;
- (iv) Presentation of plans of action or actions already taken with the intention of resolving pending matters, as well as the discussing of whether the actions indicated are satisfactory;
- (v) Analysis of noncompliance situations reported by the Compliance Area that require the involvement of the Committee;
- (vi) Analysis of risk situations and the progress of programs in view of Risk Management;
- (vii) Resolution on the recommendations for the treatment of cases;
- (viii) Time for exposure of the invited members, if any, and;
- (ix) Closing.

Article 18 - It is the responsibility of the Coordinator to prepare, manage and circulate the minutes among the participants, as well as to update all the respective action plans, as well as to make the minutes available to the meeting's participants within 5 days after the meeting.

First Paragraph - The minutes will be approved at the next meeting.

Second Paragraph - The minutes will be filed by the Compliance Committee Officer, with restricted access to the members of the Committee and Board of Directors.

Article 19 - In order to expedite recommendations and decision-making, issues of less complexity or requiring immediate solution can be addressed remotely, via e-mail.

First Paragraph - In such cases, all Committee members will be involved and actively participate in the discussion so that ultimately a decision is made by the formal quorum of absolute majority.

Second Paragraph - The Committee Officer will be responsible for organizing the discussion and formalizing the decision among all the members, regardless of their participation in the matter.

Third Paragraph - Such remote decisions will be recorded in the respective internal documents of the Committee, and presented at the beginning of the next formal meeting.

ETHICS AND COMPLIANCE MANAGEMENT TOOLS

Article 20 - The Ethics and Compliance Management Structure relies on the Ethics Channel, which is a tool for capturing noncompliance with the Code of Ethics, internal regulations and legal provisions applicable to LOG's business.

Article 21 - Currently, the *Canal Confidencial* (Confidentiality Channel) used by the Corporation is provided by the MRV Group, as shown below.

Canal Confidencial:
www.canalconfidencial.com.br/mrv
canalconfidencialmrv@br.ictsglobal.com
0800 888 2833

First Paragraph - A *Canal Confidencial* exclusive to LOG is under implementation, whose contacts will be widely disclosed.

Second Paragraph - There is guarantee of the confidentiality of all those who participate in all instances in which the Committee is involved. The Line of Conduct was created to provide employees, partners and suppliers with a confidential and secure means of communication for the reporting of conduct considered to be unethical or in breach of the current legislation.

Third Paragraph - LOG strictly prohibits any retaliation against any employee or any other person who reports a business conduct issue or cooperates with Corporation investigations.

SPECIFIC OPERATION

Article 22 - When there is a report of ethical misconduct or risk to compliance that involves the Compliance Area or any member of the Compliance Committee, the pipeline to receive the report should be changed, since those involved in possible misconduct should not have access to the report prepared. In these cases, any reports of noncompliance involving members of the Committee will be sent to the Board of Directors for due treatment and deliberation.

Sole Paragraph - In all the above cases, if the Committee needs to be involved, it cannot operate in its traditional format. Therefore, the Board of Directors must be involved on an extraordinary basis and must be composed of at least 3 members. The members of the Committee who have not been cited in such reports may be called upon, at the discretion of the Board of Directors.

CONFLICT OF INTERESTS

Article 23 - Should a member of the Compliance Committee have any potential conflict of interest to make a decision on a Compliance issue that will be discussed in the Committee, they should immediately inform the Compliance Officer and Coordinator. In such cases, the member with such

conflict of interest will not participate in the Committee and a member of the Board of Directors will replace such member and be included in the minutes.

Article 24 - If the conflicted member does not make a statement, anyone attending the meeting and who is aware of the fact will do so. As soon as the conflict of interest or private interest has been identified, the member of the Committee may not have access to information, participate in Committee meetings, exercise a vote or otherwise intervene in matters in which such member is directly or indirectly in conflict until such conflict of interest comes to an end.

SUPPORTING DOCUMENTS

Article 25 - Documents that support LOG's Ethics and Compliance Management structure:

- LOG's Business Code of Ethics and Conduct;
- Map of situations presented in the "Consent and Validation Form" of situations that may suggest conflicts of interests;
- Internal Regulations of the Audit Committee;
- Internal Policies, Rules, Procedures and Regulations;
- CLT (Consolidation of Labor Laws);
- *Novo Mercado B3* Regulation;
- Brazilian Corporation Law;
- Law 12,846 - "anti-corruption law";
- Other laws applicable to the business, and;
- Guidelines, Normative Instructions, among others, applicable to LOG.

ACCESS TO INFORMATION

Article 26 - The members of the Committee will have access to all documents and information they deem necessary for the exercise of their functions, with the exception of questions of conflict of interests.

Article 27 - If a conflict of interests is identified, the member of the Committee involved will not receive any document or information on said matter, and will withdraw from the discussions, without neglecting their legal duties.

MISCELLANEOUS

Article 28 - The activities of the Committee are confidential. Therefore, the members and invited members are to maintain full secrecy on the topics discussed at the meetings until their publication, and cannot, in any event, publicly and individually express their opinion on issues that have not been discussed and approved in the Committee.

Article 29 - The performance in the Committee does not imply any additional compensation to its members.

Article 30 - These Regulations will enter into force on the date of their approval by the Board of Directors, and will be filed at LOG's headquarters, remaining in force for an indefinite period, pending a decision to the contrary by the Board of Directors.

* * *

EXHIBIT A - EXAMPLES OF TOPICS THAT REQUIRE DIRECT ACTION BY THE BOARD OF DIRECTORS

The Board of Directors must be activated whenever there are high-risk situations and/ or complaints that represent a critical risk to the organization, such as:

Financial - situations involving high financial volume or information manipulation;

Strategic - situations involving large or strategic business partners;

Management - Executive Officers/Top Management involved in suspicious situations;

Image - situations arising from unethical and/or illegal attitudes that may be explored publicly or in a competition;

Supplier involved with slave and/or child labor;

Executive Officer involved in sexual harassment/prostitution cases inside or outside the company;

Recurrent reports of moral and/or sexual harassment by members of the Executive Board;

Business partner related to cases of internal or external corruption, and

Manipulation of accounting results covered by executive officers, identified by external audit or not;

Crisis situations that lead to: regulatory assessments with great financial impact; widespread stoppage of operations with high revenue impact; major environmental disasters;

Reports or suspicions involving members of the Compliance Committee;

Conflict of Interest of one or more members of the Compliance Committee in specific situations.

EXHIBIT B - CONFIDENTIALITY AGREEMENT

[NAME], [nationality], [marital status], [profession], bearer of identity card RG No. xxx-SSP/SP, enrolled with the Individual Taxpayer's Register (CPF/MF) under No. xxx, residing and domiciled in the city of [], business address at [address] [city], [state], [company] expressly represents to LOG's Compliance Committee:

1. to be aware that they may have access to confidential data and/or information (including, for example, financial, operational, economic, technical, personal and/or commercial information of employees, customers, suppliers or partners, as well as other commercial information or know-how) revealed during the meetings with LOG's Compliance Committee;
2. that they will not modify, eliminate or disclose to third parties, except in the case of an external investigation, such information and other information arising from the assessment and investigation process in which they are participating;
3. that they will not disclose and/or share the information, matters and progress of assessments and investigations in which they are participating or which they are conducting, with third parties that are not part of the Committee without the formal and written approval of LOG's Compliance Committee;
4. that they will immediately notify LOG's Compliance Committee, by means of communication to the Coordinator and Responsible Person for this Committee, of any violation or threatened violation of the confidentiality agreement of which it is aware;
5. that they are aware that LOG's Compliance Committee considers the partial or total breach of the confidentiality obligations set forth herein, breach of the relationship of trust, subject to the provisions of the applicable law, including labor law, without prejudice to any civil or criminal sanction and other applicable measures;
6. that they are aware that the confidentiality obligations set forth herein will survive for a period of five (5) years from the date on which it ceases to participate in the event assessment process of LOG's Compliance Committee;

Belo Horizonte, XXXXXXXX XX , 20XX.

Witnesses:

1. _____

2. _____

CODE OF CONDUCT OF LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.

INTRODUCTION

LOG Commercial Properties e Participações S.A. ("Company" or "LOG") is recognized mainly for the ethics and transparency in the conduct of its business. This conduct adopted by the Company and its employees contributes strongly to its credibility in society and in the market in general.

All guidelines contained in the Company's Code of Conduct, approved at a meeting of the Board of Directors held on November 16, 2018 ("Code") shall be strictly observed, with this document serving as reference to guide our conduct, actions and decisions, so that the credibility of our company is always preserved.

THE LOG'S CODE OF CONDUCT IS APPLICABLE IN ITS ENTIRETY:

- to all LOG personnel, regardless of hierarchical level, including, but not limited to, its employees and managers;
- to the relationship groups referenced herein, such as partners and suppliers, according to guidelines detailed in the respective chapters and rules pertaining to the performance of those groups with the companies from the Company's group.

THE LOG'S CODE OF CONDUCT IS VALID FOR AN INDEFINITE TERM. NO EMPLOYEE, PARTNER OR SUPPLIER MAY, IN ANY CIRCUMSTANCE WHATSOEVER, CLAIM TO HAVE NO KNOWLEDGE OF THE GUIDELINES AND OBLIGATIONS CONTAINED THEREIN.

COMPANY VALUES AND PRINCIPLES

- *Ethics and transparency:* To be honest in day-to-day actions, ensuring trust and credibility among our customers, employees, shareholders and suppliers.
- *Add value to the shareholder:* We look for differentiated results and we like to be recognized for it. We strictly control our costs, in order to add greater value to our shareholders. We focus on the long-term and on the perpetuation of the company.
- *Team committed:* Our results are obtained with great dedication. We all come together as a team and act as "owners", to achieve our success.
- *Sustainability:* We contribute to a better world from a social, environmental and financial point of view. Through sustainable work relationships, we ensure solid results, develop people and society as a whole.

ABOUT THE LOG'S CODE OF CONDUCT

Each employee shall have access to our Code, either through the printed document or through the virtual document, and must evaluate and understand it in its entirety. Any doubt concerning its provisions and applicability must be clarified with our direct superiors and members of the Executive

Board, always in an open and sincere manner. No internal policy may overlap with the LOG's Code of Conduct. In turn, the Code shall always be in line with current Brazilian laws.

IMPLEMENTATION OF THE LOG'S CODE OF CONDUCT

It shall always be incumbent upon the Internal Audit and *Compliance* to supervise the applicability of this Code, analyzing the information received and providing clarifications of doubts forwarded to it.

LOG ENVIRONMENT

We believe in the importance of a **pleasant** and **trustworthy** working environment and, therefore, we value the **harmony** among employees, **commitment** to business, **transparency** in relationships, collective **entrepreneurship** and continuous **improvement**. Furthermore, we seek to offer conditions that encourage meritocracy, so that our employees feel valued and proud to be part of our team.

THUS, WE MUST:

- observe the applicable laws, policies and internal regulations;
- be committed to the optimization of resources and reduction of costs and expenses in all LOG activities, understanding its importance, always maintaining the quality of products and services offered;
- preserve the environment and interact responsibly with the community, in order to provide an environment consistent with the best practices in respect of human rights;
- report any unlawful, unethical or inappropriate behavior or attempted behavior of which we are aware; and
- practice LOG's principles and values at all facilities and units, worksites and also in public places, training or events, before authorities and/or public agencies, society and the market in general.

WE MUST NOT:

- discriminate, prevent or retaliate against any employee interested in participating in internal recruitment processes as a natural alternative of career development;
- accept a title or position at LOG to obtain personal favors or benefits;
- wear sports team t-shirts, t-shirts with inappropriate and/or offensive wording and/or prints, short skirts and dresses, shorts, necklines, open sandals or flip-flops, and other garments that do not fit the corporate environment; and
- trade or exchange goods of particular interest, except at the places and times previously authorized.

AND, FOR HAVING ETHICS AS ONE OF OUR MAIN VALUES, IT IS FORBIDDEN TO:

- practice any form of discrimination, whether by religion, philosophical or political conviction, nationality, social or economic status, gender, race, disability, age, pregnancy, sexual preference, soccer team preference, among others;
- allow for inappropriate working conditions, which may be considered degrading and/or unhealthy;
- use of forced or child labor by any of our partners or suppliers;
- intimidate or make threats to others, show abusive attitudes, be it through gestures, words or behaviors against the moral and physical integrity of any person; and
- take actions or say words that can be characterized as moral or sexual harassment.

OCCUPATIONAL HEALTH AND SAFETY

In addition to being enjoyable and reliable, LOG's work environment is also healthy and safe. And commitment to health and safety is a responsibility of all LOG's employees, partners and suppliers.

THUS, WE MUST:

- always act in accordance with the Occupational Health and Safety standards and procedures;
- use PPE (Personal Protective Equipment) whenever the activity performed by the employee, partner or supplier requires;
- ensure cleanliness, organization and security at all our facilities; and
- inform the direct management of submission to medical treatment or taking of medication, which may interfere with reflexes and, as a result, safety during work activities.

IT IS FORBIDDEN TO:

- take, carry or be under the influence of alcoholic beverage or any type of drug during the professional activities and working hours; and
- carry any type of weapon on the premises or in work-related activities.

EMPLOYEES WHO EVENTUALLY USE WEAPONS AS A WORK TOOL SHALL BE DULY AUTHORIZED, IDENTIFIED, AND TECHNICALLY QUALIFIED FOR THAT.

ALL EMPLOYEES ARE RESPONSIBLE FOR PRESERVING THE COMPANY'S ASSETS AND RESOURCES.

THUS, WE MUST:

- respect the LOG name and brand, in addition to knowing and following all the guidelines contained in the Brand Manual, available on the site of intranet;

- respect copyrights guidelines and laws, and not copy, reproduce, convey, distribute or use documents, files, models, methodologies, formulas, researches, designs, projections, analyses and reports produced in the performance of LOG activities; and
- use the professional e-mail properly and only for LOG activities; comply with all policies for proper use of LOG assets and resources.

IT IS FORBIDDEN TO:

- use, take for themselves or for third parties any LOG resources for private purposes, be they office resources, resources from worksites or from points of sale;
- share credentials (IDs, passwords and badges) of individual and non-transferable use; and
- install and use in LOG's equipment illegal copies of software or copies owned by itself or by third parties, and transmit unlicensed software by the company's systems.

IN THE EXERCISE OF ITS FUNCTIONS, EMPLOYEES HAVE ACCESS TO A SERIES OF STRATEGIC AND/OR CONFIDENTIAL INFORMATION OF THE COMPANY. STRATEGIC OR CONFIDENTIAL INFORMATION IS NOT KNOWN TO THE MARKET, CURRENTLY OR IN THE FUTURE, AND ITS DISCLOSURE MAY AFFECT LOG ACTIVITIES.

The following are examples of this information: financial results, acquisitions or sales, trade secret, investments and related matters.

THUS, IT IS FORBIDDEN TO:

- share information with other employees or third parties who do not need it for their work, regardless of the medium of transmission (hard copy, electronic or oral);
- allow for undue access to information through documents and material left on desks, drawers and cabinets, and hold meetings and talk on the telephone in public places (restaurant, airport, elevator, etc.) on LOG affairs;
- breach the "Policy of Disclosure of Material Act or Fact" and the "LOG Confidentiality Agreement", which are part of the Employment Agreement;
- disclose confidential information even after the termination of the employment bond with LOG;
- use LOG information in lectures and academic papers without formal approval from the area officer; and
- convey or access inappropriate content, such as customer personal data and financial information not yet disclosed to the market, land bank, commercial databases, sales charts, wage tables, contract banks, and other LOG document templates.

USE OF SOCIAL MEDIA

LOG IS PRESENT IN THE MAIN SOCIAL MEDIA AND HAS EMPLOYEES RESPONSIBLE FOR MANAGING CONTENT AND RELATIONSHIP WITH THE MARKET AND SOCIETY IN GENERAL. HOWEVER, IT IS IMPORTANT TO REMEMBER THAT PROTECTING LOG'S IMAGE IS EVERYONE'S RESPONSIBILITY.

THUS, WE MUST:

- direct any customer complaint posted on social media to the commercial/marketing area, so that appropriate treatment is given in each case;
- not disclose LOG's and its customers' information and comments on social media, either in its own or third-party profile;
- understand that information confidentiality guidelines also apply to social media;
- understand that the disclosed information is the employee's responsibility, not LOG's; and
- not associate personal activities to LOG's name and/or brand.

The use of the Internet is only allowed for employees who need this resource to carry out their professional activities.

The use of the Internet through personal mobile devices in LOG environment should occur only at work intervals, and in a moderate manner.

It is important to understand that Internet overuse compromises productivity at work, so it is important to always use common sense.

CONFLICT OF INTERESTS

SOME SITUATIONS MAY CAUSE, FAVOR OR SUGGEST CONFLICTS BETWEEN OUR PERSONAL INTERESTS AND LOG'S INTERESTS.

THUS, IT IS FORBIDDEN TO:

- have an economic or financial interest in competitors, customers, distributors or suppliers, as such interest may interfere with their actions on behalf of LOG;
- perform in the environment and at working hours any professional activity that is not related to LOG activities;
- obtain direct or indirect financial advantage from institutions that maintain commercial relations with LOG;
- accept, directly or indirectly, money or valuables from any person or entity interested in establishing business relations with LOG;
- benefit from privileged information for the sale or purchase of LOG shares, directly or indirectly;
- maintain side activities or be a partner, directly or indirectly, of a company that is competing and/or conflicting with LOG's business;

- hire a professional to perform activity with direct subordination, which has any degree of kinship; and
- conceal from the Internal Audit the existence of family members at the Company or in partners and suppliers.

It is allowed the participation of relatives (appointed or not by the employee) in our selection and hiring processes.

THUS, WE MUST:

- make sure that the candidate is submitted to all stages of the selection process, without exception; and
- make sure that there is no favor or privilege, regardless of the degree of kinship with the LOG employee.

SOUVENIRS AND GIFTS

IT IS IMPORTANT TO AVOID SITUATIONS THAT MAY INTERFERE WITH DECISIONS OR CAUSE ANY DISCREDIT TO THE EMPLOYEE OR LOG.

THUS, WE MAY:

- accept institutional gifts with no commercial value, such as office supplies, calendar, pen, cap, book, chocolate, etc.;
- accept souvenirs and gifts other than the category above, provided that they are declared on the Intranet for a draw among all employees; and
- present customers, suppliers, partners or any third party with gifts developed as part of LOG's institutional communication strategy, provided they are approved by the Executive Board in charge.

THUS, IT IS FORBIDDEN TO:

- market internally or externally the gifts that were drawn;
- accept and/or request any type of souvenir or gift in the form of favor, money or valuable; and
- participate in events sponsored or promoted by partners, suppliers or representatives of our relationship group without formal approval from the Executive Board in charge.

We work to preserve the interests and safeguard the rights of our shareholders, investors and stakeholders, always in line with the best corporate governance practices, with the standards and regulations of the Brazilian Securities and Exchange Commission (Comissão de Valores Mobiliários) and the B3 Novo Mercado Regulation (Stock Exchange of the State of São Paulo). We adopt transparent practices, always providing information that is accurate, reliable, clear and objective to our shareholders, investors and stakeholders.

THUS, WE MUST:

- ensure that all of our institutional, financial and other information is widely disclosed to the market under the applicable laws;
- make sure that transactions involving LOG companies are properly disclosed on our website: www.logcp.com.br/relacoes-com-investidores, according to our Policy of Transactions with Related Parties; and
- maintain good relations with all shareholders, regardless of the number of shares held by them.

The Investor Relations area is responsible for contacting our investors and shareholders. Any request from shareholders and/or investors made directly to employees should be immediately directed to the Investor Relations area, so that it can be properly addressed, by the email ri@logcp.com.br or telephone (31) 3615-8400.

WE EMPHASIZE TO OUR EMPLOYEES THE IMPORTANCE OF COMPLIANCE WITH THE CVM (BRAZILIAN SECURITIES AND EXCHANGE COMMISSION) STANDARDS.

THUS, IT IS FORBIDDEN TO:

- trade shares during the periods of restriction on trading, provided for in our "Securities Trading Policy";
- use LOG privileged information to benefit directly or indirectly from the sale or purchase of shares, or transfer information so that third parties benefit from it (misuse of this information is illegal and may result in administrative, civil, and criminal penalties); and
- disclose material information, acts, events or facts to which they have access due to their position, in disagreement with our "Material Act or Fact Disclosure Policy".

PARTNER RELATIONS

WE CONSIDER AS OUR PARTNERS, COMPANIES COMMITTED TO LOG, WHICH SUPPORT US IN THE FINANCING AND DISCLOSURE OF OUR ACTIVITIES, IN CLOSE COLLABORATION TO THE DEVELOPMENT OF OUR PRODUCTS. WE SEEK SUSTAINABLE PARTNERSHIPS, COMMITTED TO ETHICS AND TRANSPARENCY.

THUS, WE MUST:

- inform our partner companies of the content of this Code.

CUSTOMER RELATIONS

OUR EFFORTS WILL ALWAYS BE TO OFFER QUALITY PRODUCTS AND SERVICES AND WITH THE BEST COST/BENEFIT RATIO.

THUS, WE MUST:

- establish with our customers a relationship of mutual trust;
- provide services to our customers with the highest quality;
- adopt a clear and transparent communication strategy on our products and services;
- promise only what we are able to meet, including reservations, discounts, prices and terms;
- act with promptness and transparency, informing our clients of situations that are beyond LOG's control and that may compromise the term of delivery or regular functioning of our projects;
- provide service to our customers with dexterity and efficiency; and
- treat our customers' information with confidentiality and caution.

RELATIONS WITH MANAGERS AND ACCREDITED PROFESSIONALS ARE IMPORTANT FOR THE DEVELOPMENT OF OUR BUSINESS.

THUS, WE MUST:

- enter into contracts and make accreditations with a long-term vision, establishing a relationship of mutual respect and trust;
- conduct with clarity and professionalism the activities developed with brokers and accredited professionals, defining by mutual agreement the rights and obligations of each party;
- require compliance with laws and obligations by brokerage firms, managers and accredited professionals;
- require brokerage firms, managers and accredited professionals to operate in accordance with the set guidelines for good service to LOG customers;
- protect the LOG brand, setting the conditions under which it can be used by real estate companies and accredited professionals; and
- give notice of the contents of this Code of Conduct to the brokers, managers and accredited professionals.

RELATIONS WITH THE PRESS

WE VALUE GOOD RELATIONS WITH THE PRESS, THUS WE WORK WITH OBJECTIVE AND TRANSPARENT COMMUNICATION. WE UNDERSTAND OUR ROLE OF OPINION MAKERS, GIVEN THE RELEVANCE OF LOG IN THE NATIONAL SCENARIO.

THUS, WE MUST:

- safeguard LOG's image and reputation;

- forward all requests received from the press to the Executive Board and to the area responsible for the Company's press office; and
- express opinions, give interviews, participate in debates or discussions only when formally authorized by the Executive Board.

COMMUNITY RELATIONS

WE BELIEVE IN THE NEED TO CONTRIBUTE TO THE SOCIAL DEVELOPMENT OF THE POPULATION IN THE LOCATIONS WHERE WE OPERATE, AND FOR THIS REASON WE VALUE RELATIONS OF RESPECT AND COOPERATION WITH THE COMMUNITY.

THUS, WE MUST:

- participate in the local community actions, such as educational initiatives, recovery of social interaction areas, environmental actions, among others;
- contribute to the improvement of the quality of life of the communities in which we are inserted; and
- take preventive actions, to minimize the impact on the communities in which we perform our works.

CONTRACTOR RELATIONS

OUR CONTRACTORS PLAY A CRUCIAL ROLE IN OUR BUSINESS, FOR THEY PROVIDE THE NECESSARY WORKFORCE FOR THE CONSTRUCTION OF OUR ASSETS. THEREFORE, IT IS ESSENTIAL FOR THEIR OPERATION TO BE ALIGNED WITH OUR PRINCIPLES, VALUES, INTERNAL POLICIES AND APPLICABLE LEGISLATION.

THUS, WE MUST:

- require compliance with all clauses of the Service Agreement entered into with LOG;
- require compliance with labor and social security legislation;
- require communication that accommodations are in place for their employees to LOG;
- require that the conditions of any accommodations in place or of the worksites are appropriate to the health and well-being of their employees;
- require the use of all PPE - Personal Protective Equipment by their employees;
- require the timely payment of wages, charges and benefits of their employees;
- require actions that preserve the environment;
- prohibit the disclosure of the conditions of services provided to LOG, or of manifestation as source of information of LOG; and
- comply with the rules for receiving and sending souvenirs, gifts and business meals made formal under this LOG's Code of Conduct.

SUPPLIER RELATIONS

OUR RELATIONS WITH SUPPLIERS ARE BASED ON ETHICS AND ALWAYS ESTABLISHED ACCORDING TO MARKET CONDITIONS

THUS, WE MUST:

- select and retain suppliers considering technical-financial criteria (quality, price, term of delivery, and service), using a clear and objective competition process;
- require from our suppliers confidentiality of the information to which they have had access before or after selection and hiring;
- acquire goods and services with the best cost/benefit ratio;
- require our suppliers to comply with the applicable legislation, including applicable anticorruption laws; and
- require our suppliers to comply with the rules on sending of souvenirs, gifts and business meals set forth in this Code.

THUS, IT IS FORBIDDEN TO:

- procure services from any supplier with a lawsuit in progress against it, and the continuation of service rendering depends on the discontinuance of the action, formally and irreversibly.

RELATIONSHIP WITH THE ENVIRONMENT

PRESERVATION OF THE ENVIRONMENT AND PROMOTION OF ENVIRONMENTALLY SUSTAINABLE ATTITUDES IS A PRIORITY FOR US. FROM THE BEGINNING, IN THE CHOICE OF THE LAND, AND DURING ALL THE STAGES OF CONSTRUCTION, WE COMPLY WITH OUR COMMITMENT.

THUS, WE MUST:

- operate according to the applicable environmental legislation;
- manage our resources and waste used on worksites;
- minimize the amount of natural resources, mainly water and energy, used at LOG facilities; and
- act so that our works become increasingly sustainable, including all stages of the construction process.

To learn more about our programs, visit our website: www.logcp.com.br/sustentabilidade/

PUBLIC ENTITY RELATIONS

WE MAINTAIN GOOD RELATIONS WITH ALL MUNICIPAL, STATE AND NATIONAL ENTITIES, SUCH AS: CITY HALLS, URBAN AND ENVIRONMENTAL LICENSING BODIES, NOTARY OFFICES, REGULATORY AGENCIES AND AUTHORITIES.

LOG is committed to the applicable standards and guidelines that have been defined by anticorruption laws, in particular the US Foreign Corrupt Practices Act of 1977 (FCPA) and the Brazilian Anticorruption Laws, namely: Law No. 12,846 of August 1, 2013, as amended, Law No. 9,613 of March 3, 1998, as amended, and Decree no. 8,420 of March 18, 2015.

THUS, IT IS FORBIDDEN TO:

- make an offer, payment, promise of payment or authorization for payment of any amount of money, gifts or valuables to any public official or authority;
- negotiate undue advantages for the obtaining and/or reduction of deadlines for licenses, authorizations, permits, decisions, among others;
- influence any act or decision of public official or authority; and
- induce public official or authority to commit any act in violation of their legal obligations.

FURTHERMORE, LOG DOES NOT ALLOW ANY CONDUCT CONNECTED TO CORRUPTION IN THE PRIVATE SECTOR.

In case the employees receive requests for or offers of "facilitating payments", they must report immediately to the Executive Board. Failure to comply with Brazilian and foreign anticorruption laws may result in serious penalties to LOG and/or its personnel, including criminal liability for the individual involved in fraudulent payments. Moreover, disciplinary measures may be taken in case of proven guilty of personnel, including dismissal with cause.

COMPETITOR RELATIONS

WE BELIEVE IN FAIR COMPETITION AND KEEP A PROFESSIONAL RELATION OF RESPECT AND CORDIALITY WITH OUR COMPETITORS.

WE MUST:

- avoid actions that may be seen as anticompetitive, monopolistic or, in any way, contrary to international, national or local laws that control competitive market practices; and
- exchange information only to achieve common goals, ensuring the confidentiality of this information.

ANY REQUEST FOR INFORMATION AND/OR REQUEST FOR A VISIT BY OUR COMPETITORS CAN ONLY BE FULFILLED AFTER APPROVAL FROM THE EXECUTIVE BOARD.

UNION RELATIONS

We value good relations with trade unions and we respect the employees' free association and the entire collective bargaining process, recognizing the fulfillment of collective agreements.

COMMUNICATION CHANNELS

LOG PROVIDES TOOLS TO ITS EMPLOYEES, PARTNERS, SUPPLIERS, AND OTHER PERSONS WITHIN ITS RELATIONS, SO THAT ALL CAN CONTRIBUTE TO COMPLIANCE WITH THIS CODE, ITS INTERNAL POLICIES AND THE LEGISLATION AND REGULATION APPLICABLE TO THE COMPANY.

We have a Confidential Channel that allows the receipt of internal and external complaints, operated by a specialized company, assuring even more confidentiality and security, thus avoiding any kind of reprisal or punishment due to the use of the Confidential Channel. It is not necessary to identify yourself when using the Confidential Channel, thus the anonymity of the person using it is assured, but it is essential to act on a responsible manner when reporting, which must be consistent, detailed and truthful. The email compliance@logcp.com.br is also available for clarification of doubts with regard to this Code and ethical dilemmas, in addition to suggestions for management of ethics at LOG.

The Company's internal audit area receives the complaints and evaluates them, in order to take the necessary measures to address them.

Currently, the Confidential Channel used by the Company is from the MRV Group, as described below.

Confidential Channel:
www.canalconfidencial.com.br/mrv
canalconfidencialmrv@br.ictsglobal.com
0800 888 2833

An exclusive Confidential Channel for LOG is in phase of implementation, which contact information will be widely disclosed.

TRAINING

Employees of the Company must participate in periodic training on the provisions of this Code and, when necessary, other LOG policies.

DISCIPLINARY MEASURES

Failure to comply with the standards contained herein is not allowed and is punishable.

POSSIBLE PENALTIES:

- Written warning;
- Suspension;
- Dismissal without cause;
- Dismissal with cause;

- Exclusion of LOG supplier, partner or contractor;
- Filing of applicable legal actions.

* * *

INSTRUMENT OF AWARENESS AND COMMITMENT

I hereby declare for all legal purposes that I have received, read and understood in its entirety the Code of Conduct of LOG Commercial Properties and Participações S.A. ("Company"), and that I am aware of and in full agreement with the established criteria and guidelines and their relevance to me and to the Company, committing myself to comply with and assure full and permanent observance of their content.

I undertake to comply fully with it, under penalty of subjecting myself to punitive administrative measures and measures for termination of my employment agreement and applicable legislation, respectively.

However, I represent that all doubts raised during the reading of the Code of Conduct of the Company have been properly clarified, leaving no doubt as to its entire content, and I am able to fully comply with the code.

Full name:

Area:

Title:

Signature:

Date:

COMPLIANCE POLICY OF LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A.

1. PURPOSE

1.1. This Compliance Policy of LOG COMMERCIAL PROPERTIES E PARTICIPAÇÕES S.A. (“Company” or “LOG”), approved on meeting of the Board of Directors held on November 16, 2018 (“Policy”), has the objective of defining the fundamental guidelines for the development and implementation of Compliance practices in LOG, as well as describing the Compliance structure of LOG and identifying those involved in the execution of the Compliance Program, as defined below. Possesses, also, the function of promoting all of its collaborators (including, but not limited to, its employees and administrators), customers and suppliers, for all the Company’s hierarchy levels, to act in accordance to its values, complying with the rules established in the Company’s Code of Conduct, in the internal policies approved by the Company, regulations and internal regiments, in Law No. 12,846, dated August 01, 2013, as amended (“Law 12.846”), in Law 9,613, dated March 3, 1998, as amended (“Law 9,613”), in Decree No. 8,420, dated March 18, 2015 (“Decree 8,420”, when considered jointly with Law 12,846 and Law 9,613, the “Anti-Corruption Laws”) and applicable legislation.

1.2. This Policy extends to all sectors of the company and all collaborators, customers and suppliers mentioned above. Compliance with the guidelines of this Policy strengthens the ethics, the Compliance, governance and efficiency of LOG, in addition to preserving the Company’s reputation.

2. CONTEXT

2.1. The practice of integrity-based business and ethical principles is an essential factor for companies to ensure the continuity necessary to survive in an increasingly competitive world.

2.2. Lack of ethics and non-compliance with specific laws, such as the Anti-Corruption Laws, besides deteriorating the atmosphere and working relationships, have exposed companies to penalties ranging from fines to the dissolution of the company itself.

2.3. In this sense, LOG has created an internal Compliance structure and a Compliance Program, which aim to disseminate an ethical culture and establish safer business from a legal and operational perspective, in addition to complying with applicable regulations.

3. EXPECTED BENEFITS

3.1. The adoption and compliance of this Policy by the Company intends to:

- (i) Implement a culture that encourages ethical conduct and adherence of the Company to applicable legislation, internal regulations, recommendations of management bodies, recommendations of ethics and conduct of the Company and to the Anti-Corruption Laws;
- (ii) Assist in the informing and training of all employees, customers and suppliers in matters related to this Policy;
- (iii) Improve the quality and speed in regulatory interpretations, as well as in corresponding policies and procedures;
- (iv) Improve the internal communication and flow of information between the Company’s bodies, as well as the synergy between them, aiding in the identification and mitigation of risks; and

- (v) Assist in the follow-up of actions for improvements in the process and correction of weaknesses.

4. THE COMPLIANCE PROGRAM

4.1. The Compliance Program aims to permeate throughout the Company a culture of ethics, integrity and transparency and ensure that LOG's business are not vulnerable to risks in relation to non-compliance with applicable rules or legislation, among them, the Anti-Corruption Laws ("Compliance Program" or "Program").

4.2. In this sense, the Program is composed of periodic evaluations (i) of the Company's risks, in compliance with its Risk Management Policy; (ii) internal regulations; (iii) training actions for its employees, customers and suppliers; (iv) the communication plan of the policies and regulations in force; (v) the evaluation process given to third parties in order to gather information about their reputation; and (vi) the Confidential Channel, which constitutes LOG's channel of denunciations, among other elements that allow the Company to comply with applicable laws and regulations.

4.3. All employees are Compliance officers and, therefore, must act in accordance with the laws and regulations applicable to the scope of their duties, taking care of the values and principles of the Company contained in its Code of Conduct and this Policy.

4.3.1. Under the terms of item 4.3 above, all areas of LOG are responsible for the effectiveness of Compliance functions and must report any suspicion of irregularity in compliance with applicable internal regulations and legal provisions, such as evidence of fraud, corruption, ethical deviations and conflicts of interests.

5. DEFINITIONS

5.1. **Compliance:** For the purposes of this Policy, the expression "Compliance" derives from the English verb "*to comply*", which means duty to comply, be in accordance with and enforce laws, decrees, regulations, Anti-Corruption Laws and instructions applicable to LOG's activities, as well as internal and external rules of the Company, whose non-compliance may result in the application of sanctions, financial losses, damages to reputation and image.

6. FUNCTIONS OF THE COMPLIANCE STRUCTURE

6.1. The Program and this Policy will be supervised, managed and reviewed by the Company's Compliance area, which may, at any time, suggest changes as it deems necessary to the Audit Committee, which will evaluate said suggestion and recommend it to the Board of Directors. The Compliance area will be assisted by the legal department to ensure the implementation and execution of the Program and this Policy, taking all necessary steps to comply with the guidelines established therein.

6.2. The Compliance Committee, the Compliance area and the legal department, in relation to the Program and this Policy, must report to the Audit Committee, which is responsible for managing and monitoring Compliance risks, as well as detecting deviations, fraud, irregularities and unlawful acts against the public administration, national or foreign, following the guidelines presented in this Policy, in the Risk Management Policy and in the Internal Rules of the Audit Committee. Once identified such risks, deviations, fraud, irregularities and illicit, the Board of Directors is responsible for adopting mitigation and sanitation procedures. Decisions related to risk mitigation deliberated by

the Board of Directors and by the Audit Committee will be supported by the Company's Executive Board, which, in turn, assists the Compliance area in maintaining internal Compliance controls.

6.3. This model of structure and reporting mechanics were defined and based on the best market and corporate governance practices, aiming to guarantee the independent and segregated performance of the Compliance area.

6.3.1. The Audit Committee maintains independence in the conduct of actions with all areas of the Company, in order to guarantee impartiality in all its operations and controls, reporting directly to the Board of Directors.

6.4. **Normative function:** The Compliance area is responsible for creating, reviewing and updating the documents related to ethics and Compliance, which aim to provide the guidelines of conduct expected of all employees in face of the Company's daily situations. With respect to this Policy, the Compliance area is responsible for suggesting the updates to the Audit Committee, which will recommend them to the Board of Directors.

6.4.1. In addition to this Policy, the following are examples of such documents: (i) the Code of Conduct, which establishes guidelines for the Company's employees to perform their duties and activities, as well as any possible conflicts of interest that may arise; (ii) the Anti-Corruption Policy, which provides guidelines for the relationship with public agents, in order to guarantee the transparency of the business conducted with the national and international public sector; (iii) the Regiment of the Compliance Committee, which governs the performance of said Committee, defining its scope of action, composition, responsibilities of its members and operating dynamics; and (iv) the Due Diligence Policy of Third Parties, which describes the due diligence process of third parties to carry out the third-party reputation checks with which the Company intends to contract, which is still in process of approval.

6.5. **Educational function:** The Compliance area is responsible for ensuring the disclosure, communication and knowledge of compliance policies, procedures and guidelines by all employees, as well as for training them through periodic training. For this, it is fundamental that the Compliance culture is disseminated based on the content and provisions established by the respective regulations, through (i) communication plan on the existence and importance of the Compliance Program and the existing rules/regulations; and (ii) a plan for periodic training on ethics and compliance issues, including, among others, the provisions contained in the Code of Conduct and in the Anti-Corruption Laws.

6.6. **Advisory function:** The Compliance area should clarify doubts and support LOG's areas that seek compliance with any regulations and issues related to Compliance, as well as assist in the application of the Code of Conduct, internal policies and other regulations, advising on the creation and/or review of processes, policies and procedures.

6.6.1. The Compliance area and the Compliance Committee should clarify interpretation doubts about situations not foreseen in the Compliance regulations, advised, when necessary, by the legal department.

6.6.2. Questions can be sent to the email compliance@logcp.com.br.

6.7. **Deliberative function:** The Compliance area must analyze violations, irregularities or indications of corruption reported and assist the Compliance Committee in the definition of administrative and/or legal penalties, whenever there is evidence of non-compliance with regulations and/or internal rules. In addition, whenever requested, it must trigger other areas of the Company that are necessary for the discussion regarding the applicable penalty.

6.8. **Preventive function:** The Compliance area must identify, evaluate and respond to risks and combat situations of evidence of irregular conduct and corruption that may cause material and reputational damages to the Company.

6.9. **Monitoring and control function:** The Compliance area must guarantee and improve the internal control structure of the main integrity risks to ensure its effective management, as well as to analyze and handle conflict of interests statements and receipt of gifts, gifts and hospitality, under the terms of the Code of Conduct of the Company.

6.10. In order to perform their duties, the Compliance area, the legal department, the Compliance Committee, the Audit Committee and the Board of Directors may request the sharing of reports, documents, e-mails and other information necessary for the exercise of activities.

7. ATTRIBUTIONS OF THE COMPLIANCE STRUCTURE

7.1. Board of Directors:

- Establishes the risk guidelines for the Company, under the terms of the Risk Management Policy;
- Approves this Policy and its future revisions;
- Supervises the Company's risk management activities and Compliance; and
- Acts and interacts with the Audit Committee in order to ensure compliance with the established risk guidelines.

7.2. Executive Board:

- Supports the decisions of the Board of Directors and of the Audit Committee with regard to risk mitigation;
- Subsidies resources for the implementation of effective internal controls and risk mitigation strategies;
- Guarantees a regular schedule of training on conduct and ethics for the management and employees of the Company, jointly with the Compliance area; and
- Maintains an environment of effective internal controls and Compliance;

7.3. Audit Committee:

- Evaluates and monitors the Company's exposures to risk;
- Accompanies, demands and ensures compliance with: (i) the laws and regulations applicable to the Company's business and activities; (ii) the Code of Conduct; and (iii) internal rules, regiments, policies and manuals;
- Ensures the adequacy, strengthening and operation of the Company's internal control systems;
- Looks after and disseminates the Company's commitment to management based on the pillars of corporate governance, sustainability and corporate ethics;

- Fights against all forms of corruption;
- Reports to the Board of Directors the results of the risk assessments;
- Investigates complaints, whether or not it comes from the Confidential Channel, in an exempt manner, respecting the integrity of the complainant and the defendant, with the assistance of the Compliance Committee;
- Responds to the requirements of regulatory bodies regarding legal compliance with specific issues such as: CVM regulations, anti-corruption, fraud prevention and money laundering, competition protection laws and other pertinent legal matters that may be addressed to the Compliance structure;
- Defines the priorities and strategies of the Compliance area and of the Compliance Committee;
- Guarantees the allocation of personnel in the Compliance area in sufficient quantity and with the appropriate qualification to exercise the activities related to the Compliance Program;
- Receives suggestions from the Compliance area for altering and updating this Policy and communicates them to the Board of Directors;
- Creates the necessary mechanisms for the evolution of the Compliance Program's maturity, and its respective scope of action; and
- Performs the periodic report on the Compliance Program to the Board of Directors of LOG.

7.4. Compliance Committee:

- Evaluates issues of ethical dilemmas that may arise within LOG;
- Accompanies, demands and monitors, together with the Audit Committee, the faithful compliance with: (i) the laws and regulations applicable to LOG's business and activities; (ii) of the Code of Conduct; and (iii) internal rules, regiments, policies and manuals;
- Combats all forms of corruption and/or favoring, together with the Audit Committee;
- Issues recommendations on situations of potential conflict of interests that could generate a risk of Compliance; and
- Analyzes, together with the Compliance area, deviations of conduct and noncompliance with the internal regulations that may be identified/reported, either by the monitoring activities or by reporting from the Confidential Channel, reporting to the Audit Committee.

7.5. Compliance area:

- Prepares the communication and training plan, with support from the area of internal communication and human resources, which intends to disclose the internal policies regarding compliance with applicable rules, regulations and laws;
- Ensures the execution of the communication and training plan of the Compliance Program;
- Monitors the compliance with activities related to this Policy and to the Compliance Program based on defined strategies;

- Disseminates standards of integrity and ethical conduct as part of LOG's culture;
- Oversees the applicability of the Code of Conduct of the Company, together with the internal audit area, analyzing the information received and providing clarifications of doubts that are forwarded to it;
- Assists and clarifies doubts from all areas of LOG regarding policies, processes and other regulations related to ethics and compliance, advised, when necessary, by the legal department;
- Monitors situations involving compliance risks and reports to the Audit Committee;
- Develops training aimed at raising awareness and reinforcing the ethical culture, as well as other Compliance topics that are relevant, with the support of the human resources area;
- Develops the necessary logistics for the implementation of Compliance training, communicating the target audience regarding the training, firing the calls, preparing the attendance list, as well as taking any other necessary action, together with the Executive Board of the Company;
- Conducts and/or accompanies the investigation of possible violations of internal regulations and legal mechanisms that may imply risk to Compliance, including any irregularity or indication of corruption, in conjunction with the Compliance Committee;
- Directs and promotes preventive actions to mitigate situations of Compliance risks and ensures that corrective measures are taken when Compliance failures are identified;
- Reviews Compliance policies and procedures, keeping them updated and, in relation to this Policy, suggests updates to the Audit Committee, which recommends them to the Board of Directors;
- Controls the Terms of Acceptance and Commitment, Clarification and Validation of Conflicts of Interest and other forms of control that are relevant to the Compliance Program;
- Periodically develops and reviews the criteria and mechanisms used to conduct due diligence in relation to third parties, in order to gather information regarding the reputation of the third parties with whom the Company intends to relate;
- Manages and implements third party due diligence processes;
- Performs and approves third party due diligence as defined in the LOG Due Diligence Policy;
- Signals to the other areas the need to develop or review processes/procedures in order to minimize any vulnerability of Compliance that may exist;
- Acts, together with the control area, in the development of controls directed to the risks of Compliance faced by the different areas of the Company, in compliance with the Risk Management Policy;
- Prepares, as requested by the Audit Committee and by the Board of Directors, follow-up reports that allow assessing the effectiveness of actions related to the Compliance Program, giving visibility to situations that are sensitive from the point of view of Compliance, such as: non-compliance with regulations, analysis of financial transactions

suspected of money laundering, sensitive relationships not reported by employees, among others; and

- Elaborates report to be sent to the Audit Committee and to the Board of Directors, at least quarterly, containing a summary of the results of activities related to the Compliance Program, conclusions, recommendations and measures taken to remedy situations of non-compliance with internal or external standards.

8. INTERFACES OF THE COMPLIANCE STRUCTURE WITH THE OTHER AREAS OF LOG

8.1. Human development:

- Assists in the identification of training necessary for the training of employees of the Compliance structure, as well as in the preparation of the Compliance Program training plan;
- Reports on changes in positions, functions and other hierarchical movements that impact the activities of the Compliance area;
- Assists in the processes of investigating irregularities in connection with human resources matters, whether in the calculation itself or through the provision of requested information, as long as they comply with the internal norms and laws and current and applicable laws;
- Acts in conjunction with the Compliance area and, when requested, in the analysis of deviations verified, as well as contributes to the decision of the disciplinary measures to be applied; and
- Shares with the Compliance area the relevant information derived from the climate research conducted by the human development area to verify the opinion of the Company's employees regarding the organizational environment in which they operate, interviews with employees, evaluation cycles, among others.

8.2. Internal communication:

- Assists in the elaboration of the communication strategy, such as the communication plan of the Compliance Program; and
- Assures and supervises the execution of the Compliance Program communication plan in conjunction with the Compliance area.

8.3. Marketing:

- Validates and aligns, along with the Compliance area, the external disclosure of any content regarding the corporate positioning adopted by the Company with respect to Compliance matters, as well as any content that may impact the Company in any way.

8.4. Legal:

- Assists and clarifies doubts regarding the laws applicable to LOG's business, especially regarding corruption, antitrust, cartel formation, money laundering, competition laws, bidding and conflict of interest;
- Ensures that contractings made by the Company are carried out in a manner that respects the guidelines, principles and provisions of the Code of Ethics, this Policy and the Company's Anti-Corruption Policy; and
- Assists in investigations, where necessary, regarding misconduct, providing the requested information and providing the necessary legal support, including what disciplinary measures may be applied.

8.5. Supplies:

- Conducts the due diligences of third parties whenever necessary and requested by the Compliance area, subject to the guidelines in LOG's Due Diligence Policy.

8.6. Financial:

- Performs financial records in accordance with the law, presenting reliable financial data, which reflects the reality of transactions, ensuring the preservation of original documents such as receipts, invoices and expense reports for audit purposes in accordance with deadlines and other requirements stipulated in law.

8.7. Investor relations:

- Works in conjunction with the Compliance area in connection with the provision of information on this Policy and the Compliance Program to the shareholders, investors and regulatory bodies. All information that will be disclosed to investors and the market about the execution and evolution of this Policy and the Program shall be previously aligned with the Compliance area and approved by the Audit Committee, Investor Relations Officer and by the Board of Directors, in that which is applicable within the respective assignments.

9. COMMUNICATION TOOLS

9.1. In order to ensure the effectiveness and compliance with this Policy and the Compliance Program, the Company has made available some communication tools to clarify doubts and make complaints.

9.2. Feedback and Suggestions Channel:

9.2.1. The Company is implementing a Doubts and Suggestions Channel that will be managed by the Compliance area, assisted, when necessary, by the legal department, which will seek to clarify doubts regarding the interpretation of the regulations or to take action against possible ethical dilemmas that employees may come to face.

9.3. Confidential Channel:

www.canalconfidencial.com.br/mrv
canalconfidencialmrv@br.ictsglobal.com
+55 0800 888 2833

9.3.1. The Confidential Channel is a tool that allows the identification and combat of abuses, behavioral deviations, harassment and fraud so that situations are investigated and addressed. This Channel is operated by ICTS Protiviti, a specialized, outsourced and independent company, being totally safe and confidential, preserving the identity of the user and guaranteeing their anonymity, in order to avoid any type of reprisal or punishment due to the use of the Confidential Channel. It is essential to act responsibly when reporting, which must be consistent and truthful. The Company currently shares the Confidential Channel with its parent company, MRV Engenharia e Participações S.A., but is already taking all necessary steps to implement its own channel.

10. GENERAL PROVISIONS

10.1. The Board of Directors shall evaluate the adequacy of this Company's Policy and make changes whenever necessary.

10.2. This Policy shall enter into force upon its approval by the Board of Directors, and shall remain in force for an indefinite period, pending a decision to the contrary. Any changes to this Policy shall be approved by the Board of Directors.

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