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These policies are subject to change without notice.

Who applies	All users Local Franchises; Pioneering Franchises; Regional Offices; local Franchises
Policy number	029
Date of this version	07/04/09
Responsible area	Operations
Replaces the version of	07/04/09
Date of original version	07/04/09

Nature of review

07/04/09 - New policy.

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Purpose

This policy aims to instruct franchisees and employees on the criteria for delivery or receipt of gifts or gifts

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Policy

Limpidus employees may only receive gifts, courtesies and/or promotional discounts from suppliers as long as they are part of the supplier's communication strategy or have wide distribution and are usually offered to all who have a relationship with the supplier and, also, as long as such gifts/courtesies have no commercial value.

Limpidus employees may only accept invitations to lunches, dinners or events when this action is admittedly practical due to the supplier's business relationship and, also, upon approval of their immediate superior.

Limpidus employees will only offer suppliers gifts developed as part of Limpidus' communication strategy, made on a large scale; and will only offer lunches, dinners and/or tickets for events that are within reasonable limits covered by the company's business practices.

Any entertainment or gift accepted from a supplier or franchisee shall be modest and for the strict purpose of facilitating the achievement of commercial objectives. For example, if tickets are offered for a sports match or cultural event, the person offering the tickets must also attend the event. In general, entertainment offers, in the form of meals or drinks, may be accepted, provided they are low-cost, infrequent and, as far as possible, reciprocal.

Since these instructions do not cover all possible events, we must exercise good judgment of situations. Say that ? everybody do that? if we face difficulties in deciding whether a particular gift or entertainment can be considered an acceptable business practice, we should ask ourselves the following questions: ?Is it directly related to the conduct of the Company's business? Is its value meaningless, reasonable? Would I be comfortable telling other customers and suppliers that I gave or received this gift? Or other employees? My superior? My family? Would I feel obligated to grant favors in exchange for the gift? I'm sure the gift doesn't violate any Limpidus laws or policies?

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Support documentation

There are no supporting documents for this policy.

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Supplements

There are no supplements to this policy

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Contact information

Questions about this policy and whether or not to accept a particular gift or gift, consult your immediate superior. If you want to send suggestions for improving this policy, send an email to politic@limpidus.com.br

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Background/reasoning

There is no background/reason for this policy.

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I declare that I have read the above policy and am aware of it