

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 Annex I here to.

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 Annex 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.

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Related Party Identification Form – Annex 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 DIRECTIORS 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 – Annex 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 Annex 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: