

CODE OF CONDUCT FOR CONTRACTED THIRD PARTIES



oi

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1. OVERVIEW AND RESPONSIBILITIES

This manual aims to guide actions and define the main guidelines that drive the relationship between Oi and all forms of Contractors [including but not limited to Suppliers and Business Partners]. We hope that this manual will help to reduce the difficulties and personal interpretations of principles and values that must be respected throughout our value chain.

It is the Contractor's duty to preserve the image and reputation of Oi, following the ethical standards set forth in this document, in their relationship with Oi, its customers, suppliers, competitors, partners and other stakeholders.

Contractors are expected to establish appropriate training measures to transfer to their managers and employees, knowledge of this Manual, generally recognized laws and regulations, and standards.

2. COMPLIANCE WITHIN OI

Oi establishes the adoption of compliance standards to comply with rules, internal and external regulations and best business practices, promoting process efficiency and strengthening an ethical culture of integrity, sustainability and risk management, aiming at preserving the Company's image, reputation and sustainable continuity. In this sense, Oi, represented by its contract managers, promotes the permanent search for the effective full contract compliance by both parties.

3. INTEGRITY IN COMMERCIAL NEGOTIATIONS

All Contractors must act with integrity and impartiality in their relationship with Oi and our customers. Thus, any form of corruption [Passive or Active], extortion or fraud is strictly prohibited, such as:

- Requesting or accepting money or any undue benefits from or to Oi employees;
- Falsifying documents;
- Using or offering products of illegal origin.

A. CONFLICT OF INTEREST

Any type of private relationship between the Contractor and Oi employees must be formally communicated to the Supply Department, such as family relationships between employees or representatives of the Contractor and employees of Oi.

Operations involving employees and managers in a private or personal business that interfere with the Company's interests or result from the use of confidential information obtained by virtue of the exercise of the position or function they occupy in the Company are prohibited.

The Contractor may not have in its staff a professional in service of Oi who is also in service of Oi by another Contractor.

B. GIFTS, PRESENTS AND OTHER HOSPITALITIES

Oi, its subsidiaries and affiliates have a Policy of Gifts, Presents and Other Hospitalities that aims to define specific rules and guidelines for the offer and acceptance of gifts, offerings, meals, travel, entertainment and other courtesies.

Through this Policy, the Company reinforces its commitment to transparency, compliance and ethics in the interpersonal relationships governed by its employees. We expect our Contractors to understand these rules and to respect them.

Therefore, we do not consent to the acceptance of gifts and any offerings in exchange for any undue advantage, that is, any favoring not provided for by law. Oi establishes the threshold amount of R\$ 200.00 [two hundred reais] related to the acceptance or offering of gifts. If the Contractors have a lower limit than the one defined by Oi, the one with the lowest value shall prevail. We emphasize that the amount cannot be evidenced in cash, check or representative title.

However, Oi repudiates the configuration of a habitual aspect, that is, when the act of offering and/or receiving any of these items frequently happen to the point of establishing a condition for the maintenance of the relationship.

We believe that gifts are part of business relationships and can be offered and received, as long as its distribution occurs as a courtesy and has a general character, and is not directed exclusively to a particular person. We consider that, generally, the gifts bear the logo of the offering company thus validating its advertising characteristic.

4. RULES OF CONDUCT

A. EXPECTED CONDUCT IN RELATION TO PRIVACY

Contractors must use information classified as confidential exclusively for professional purposes and within the activities and services established in the commercial contracts, and it is forbidden to use them for one's own benefit or for the benefit of third parties.

The use of the credentials made available by Oi (IDs, passwords and badges) to employees of the Contractors at the service of Oi is individual and non-transferable, and their sharing is prohibited at any level.

B. EXPECTED CONDUCT IN RELATION TO SOCIETY

Diversity is the source of our culture. Therefore, any manifestation of discrimination and prejudice regarding race, origin, gender, age, religion, sexual orientation, physical and mental disability, among others, is unacceptable. Conversations and attitudes involving

physical or verbal abuse, moral or sexual harassment are not allowed.

Oi does not agree with child, slave, forced or compulsory labor. Suppliers must address these causes, as well as the sexual exploitation of children and adolescents.

C. EXPECTED CONDUCT IN RELATION TO OCCUPATIONAL HEALTH AND SAFETY

Contractors shall ensure the health, safety and well-being of their employees through internal actions, in addition to following the Norms and regulations of Occupational Hygiene, Safety and Medicine, according to the Law and its supplements. Contractors will also deliver appropriate and sufficient Personal Protective Equipment (PPE) and submit documents demonstrating their management of environmental risks.

D. EXPECTED CONDUCT IN RELATION TO THE ENVIRONMENT

Oi believes that its Contractors should value sustainability and the appropriate management of natural resources, such as the responsible use of water and energy in conjunction with the reduction of greenhouse gas emissions as well as efficient waste management.

We encourage the search for new technologies capable of minimizing the environmental impacts and improving life in the communities in which we are inserted.

Just as the Company is subject to environmental legislation, it understands that third parties should cooperate with this commitment and follow the regulations in force in the country.

E. EXPECTED CONDUCT IN RELATION TO PUBLIC AUTHORITIES

Contractors' relationship is based on professional and correct attitudes.

It is prohibited to provide, offer, promise or receive any form of "bribery" or gratuity or to commit any act of corruption with the purpose of exerting influence over any authorities, public servants, executives and public officials or national or foreign public entity.

Therefore, any type of behavior that is unethical or contrary to national or international anti-bribery or anti-corruption laws applicable to Oi is prohibited, including, as appropriate, the US Foreign Corrupt Practices Act, provided that Oi issues Securities in the United States.

5. "DUE DILIGENCE" - DILIGENCE ON SUPPLIERS

In the pursuance of complying with the Brazilian anti-corruption legislation in force as well as the maturing of supplier and third-party evaluation processes, Oi implemented its Compliance Program through risk assessment. On that account, the relationship with the Contractors will be analyzed and preceded by adequate diligence and verification in order to identify possible restrictions that may prevent the beginning or maintenance of relationships with Oi.

When requested, contractors shall provide true and accurate information for this evaluation. Contractors authorize the verification and confirmation of the information and undertake to notify Oi in case of any changes in this information.

Diligences will be carried out by a specialized team according to the planning and criticality established by Oi and shall be communicated formally before the beginning of the work.

6. SUPPLIER PERFORMANCE MONITORING AND ACTION PLAN

Contractors may be submitted to a Due Diligence questionnaire [Audit] to be evaluated for ethics and integrity in their respective company. They shall be monitored annually and Due diligence may be requested in loco. If there is a change in the questionnaire model carried out by Oi, the Contractors shall respond to this new request and meet the requirements.

In the case of identifying opportunities and improvements, the Compliance Department will develop an Action Plan with the supplier and report the risks to the Supply Department.

7. WHISTLEBLOWING CHANNEL

Oi provides its Contractors with an exclusive channel to receive complaints related to noncompliance with this manual, the Code of Ethics and any rules or guidelines of the Company, including improper and illegal conduct.

The Company's Whistleblowing Channel is independent and outsourced, guaranteeing the confidentiality of all data. After it has been screened, the complaint is sent to the Oi Forensic Audit, where it is examined and investigated. The Ethics Committee decides what measures will be applied.

We ensure the protection of anonymity and the confidentiality of information, and any kind of retaliation against the complainant is prohibited.

The complaint can be made online at www.canalconfidencial.com.br/oi or by telephone [0800 282 2088]. When reporting, state the reason for your complaint and the situation where the improper conduct occurred. It is important to make a thorough and detailed description.

It is up to the Contractors to disclose the Company's Whistleblowing Channel to their employees at Oi's service.

8. EFFECTIVENESS

This Manual of Conduct shall become effective as of its publication. Contractors must sign the required Term of Responsibility before their contracting.

