



Policy Regarding Disclosure of Relevant Fact or Act	Version: 1.0
Approver: Board of Directors	Date of approval: 02/17/2020

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1. PURPOSE

- 1.1. The purpose of this "*Policy Regarding Disclosure of Relevant Fact or Act*" created by **AMBIPAR PARTICIPAÇÕES E EMPREENDIMENTOS S.A.**, approved at a meeting of the Company's Board of Directors, is to govern the internal procedures to be adopted in order to fully meet the legal and regulatory provisions on the disclosure of a relevant fact or act, as per Brazilian Securities and Exchange Commission (CVM) Instruction 358 (as defined below).

2. DEFINITIONS

- 2.1. The terms and expressions below, when used herein, will have the following meanings:
- 2.1.1. "**Controlling Shareholder**": the shareholder or group of shareholders, bound by a shareholders' agreement or under shared control, who exercise the direct or indirect controlling power over the Company, as per the Joint-Stock Companies Act.
- 2.1.2. "**Relevant Fact or Act**": any decision made by the Controlling Shareholder, resolution of the shareholders' meeting or company's management bodies, or any other political, administrative, technical, trade, economic or financial act or fact that has happened or is related to the Company's business, which may have a considerable influence on: **(a)** the quotation of Securities; **(b)** the investors' decision to purchase, sell, or keep said Securities; or **(c)** the investors' decision to exercise any rights inherent to the condition of holder of Securities, which may include, as per the CVM Instruction 358, potentially, but not limited to, the potentially relevant acts or facts mentioned in **Annex A** of this Policy.
- 2.1.3. "**Company**": Ambipar Participações e Empreendimentos S.A.
- 2.1.4. "**Board of Directors**": the Board of Directors of the Company.
- 2.1.5. "**CVM**": the Brazilian Securities and Exchange Commission.
- 2.1.6. "**Business Day**": any day commercial banks operate in the city of São Paulo, state of São Paulo.
- 2.1.7. "**Investor Relations Officer**": the Company's officer elected to perform the tasks set forth in CVM's instructions and regulations, including the execution, monitoring, and enforcement of this Policy.
- 2.1.8. "**Market Entities**": the set of stock exchanges or entities of the over-the-counter market in which the Securities are or may be admitted for trading, as well as the equivalent entities in other countries.
- 2.1.9. "**CVM Instruction 358**": CVM Instruction 358, of January 3, 2002, as amended.
- 2.1.10. "**Joint-Stock Act**": Law 6,404, of December 15, 1976, as amended.
- 2.1.11. "**Relevant Negotiation**": business or set of businesses through which the direct or indirect shareholding: **(i)** of the direct or indirect Controlling Shareholder; and/or **(ii)** of the shareholders that elect the members of the Board of Directors or Audit Committee; and/or **(iii)** any natural person or legal entity; and/or **(iv)** group of people, acting jointly or representing the same interest, exceeds or



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is lower than five percent (5%), ten percent (10%), fifteen percent (15%), and thus successively, of a type or class of shares representing the Company's capital.

2.1.12. **"Policy"**: this *Policy Regarding Disclosure of Relevant Fact or Act of Ambipar Participações e Empreendimentos S.A.*"

2.1.13. **"Securities"**: any shares, debentures (whether convertible or not), real estate receivables certificates, subscription warrants, subscription rights and receipts, promissory notes, stock options, or derivatives of any kind, or also any other bonds or collective investment agreements issued by the Company or related to them that, by legal definition, are considered to be "securities".

3. PRINCIPLES

3.1. This Policy is based on the following principles and goals:

- (i) Providing full information to the Company's shareholders and investors.
- (ii) Ensuring broad and immediate disclosure of a relevant fact or act.
- (iii) Enabling equal access to public information about the Company to every shareholder and investor.
- (iv) Protecting the confidentiality of non-disclosed Relevant Fact or Act.
- (v) Cooperating with the stability and development of the Brazilian stock market.
- (vi) Consolidating good corporate governance practices at the Company.

4. DISCLOSURE PROCEDURES

4.1. The Investor Relations Officer is responsible for the disclosure and communication of the Relevant Fact or Act to the CVM and to the Market Entities, as well as for the execution of the other procedures set forth herein.

4.1.1. The Relevant Fact or Act shall be:

- (a) Disclosed through a news portal with an online page that contains a section available for free access to the full information, and
- (b) made available: (i) on the page of the CVM's periodic and occasional information system (Empresas.net System); and (ii) on the Company's Investor Relations website (www.ambipar.com/ri), with a content that is at least identical to that sent to the CVM.

4.1.2. The information contained in the Relevant Fact or Act shall be presented in a clear and accurate manner, in an objective language that is accessible for the investors. Whenever a technical concept is used which, to the Investor Relations Officer's discretion, is considered more complex, the information disclosed must contain an explanation of its meaning.

4.2. If the Relevant Fact or Act is published by any media, including press release, or at meetings of trade associations, investors, analysts, or with a selected audience, in Brazil or abroad, the Investor Relations Officer shall simultaneously disclose the information to the market, as established herein.



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- 4.3. The Controlling Shareholder, officers, members of the Board of Directors, members of the Audit Committee, and members of any technical or consulting bodies created by the bylaws, when established, which signed the instrument contained in **Annex B**, as well as any employee of the Company who has access to information about the Relevant Fact or Act, as per Clause 6.3 of this Policy, will be responsible for reporting to the Investor Relations Officer any and all Relevant Facts or Acts they may be aware of and which they know the Investor Relations Officer is not aware of yet, who will disclose it, as per this Policy.
- 4.3.1. The people mentioned in Clause 4.3 above must verify if the Investor Relations Officer took the measures provided for in this Policy regarding the disclosure of the information.
- 4.3.2. The communication to the Investor Relations Officer, mentioned in Clause 4.3 above, must be sent electronically to the address: ri@ambipar.com.
- 4.3.3. If the people mentioned in Clause 4.3 above find an omission of the Investor Relations Officer in the performance of their duty to communicate and disclose Relevant Fact or Act, and provided there has been no resolution on the confidentiality of information, as per Section 5 of this Policy, these people shall immediately report the Relevant Fact or Act to the CVM to be exempt from the responsibility imposed by the applicable regulations in the event of non-disclosure.
- 4.4. Whenever the CVM or the Market Entities require additional clarifications regarding the report and disclosure of a Relevant Fact or Act from the Investor Relations Officer, or in case of an atypical oscillation in the quotation, price or volume of trade of Securities, the Investor Relations Officer shall talk to the persons who have access to the Relevant Fact or Act in order to check if these persons are aware of information that must be disclosed to the market.
- 4.4.1. The persons mentioned in Clause 4.4 above must respond to the Investor Relations Officer's request immediately. If they cannot meet in person or have a phone call with the Investor Relations Officer on the same day the Investor Relations Officer became aware of the CVM or Market Entities' request, the persons in question must send an e-mail with the relevant information to ri@ambipar.com.
- 4.5. The Relevant Fact or Act shall be disclosed simultaneously to the CVM and Market Entities disclose, one (1) hour before the beginning or after the end of business of the Market Entities, whenever possible.
- 4.5.1. When the Securities are being simultaneously traded at Brazilian and foreign Market Entities, the Relevant Fact or Act shall be disclosed one (1) hour before the beginning or after the end of business in all countries, whenever possible, and, in case of incompatibility, the Brazilian market's working hours will prevail.
- 4.5.2. If it is imperative to disclose the Relevant Fact or Act during the trading hours, the Investor Relations Officer, when reporting the Relevant Fact or Act, shall always simultaneously request that the Brazilian and foreign Market Entities suspend the trade of Securities for as long as may be necessary to properly disseminate the information, as per the applicable regulations.



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- 4.6. The Investor Relations Officer shall establish and disclose to the market, in advance as per the market standards and the applicable regulations, the dates when the duly audited quarterly, semiannual, or annual results of the Company will be disclosed.
- 4.7. The Company may adopt the practice of disclosing its short- and long-term future performance expectations (guidance) to the market, especially regarding financial and operating aspects of its business, upon decision of the Board of Directors.
- 4.7.1. In the event of disclosure of these expectations, the following applies:
- (i) The early disclosure of results may be admitted in case of unaudited preliminary information presented clearly for each of the planned items and periods.
 - (ii) These estimates must be reasonable and accompanied by relevant premises, parameters and methodology adopted, and considered reasonable hypothetical data that do not constitute a performance promise.
 - (iii) The results of informational documents prepared in accordance with foreign accounting standards must present the conciliation with the Brazilian accounting practices, as well as with the accounting items expressed directly in the Company's financial statements and, therefore, obtained using the accounting criteria adopted in Brazil.
 - (iv) If the data presented refer to a third party, the respective source must be presented.
 - (v) If the information disclosed involve the development of projections, the comparison with the actual results must be presented upon the disclosure of the Quarterly Information (ITR) Form and the Standard Financial Statements (DFP) Form of the Company.
 - (vi) The projections and estimates disclosed must be included in the Company's reference form.
 - (vii) If the projections disclosed are discontinued, this fact must be reported, together with the reasons that lead it to lose its validity, in the form of a Relevant Fact or Act.

5. DISCLOSURE EXCEPTION

- 5.1. Exceptionally, the Relevant Facts or Acts may not be disclosed if the Controlling Shareholder or the Company's management understands that its disclosure would endanger a rightful interest of the Company, and the procedures established herein must necessarily be adopted to protect the confidentiality of such information.
- 5.2. Notwithstanding the provisions of Clause 5.1 above, the Investor Relations Officer will immediately disclose the confidential Relevant Fact or Act if the relevant information becomes totally or partly known, or in the event of an atypical oscillation in the quotation, price, or traded volume of securities issued by the Company or with reference to them, and also in the event the CVM or the Market Entities decide for the disclosure.
- 5.3. The Controlling Shareholder or the Board of Directors, through its Chair, must request that the Investor Relations Officer immediately disclose the Relevant Fact or Act kept confidential in any of the events mentioned in Clause 5.2 above.



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5.3.1. If the Investor Relations Officer fails to take the necessary actions for the immediate disclosure mentioned in Clause 5.3 above, it will be incumbent, as applicable, upon the Controlling Shareholder or the Chair of the Board of Directors to take said actions.

5.4. The Investor Relations Officer must always be informed of a Relevant Fact or Act kept confidential, being responsible, jointly with the people who are aware of the information, for ensuring the adoption of proper procedures to protect the confidentiality.

5.5. Whenever those who are aware of a Relevant Fact or Act that is kept confidential have doubts regarding the lawfulness of the non-disclosure of information, the matter must be submitted to the CVM as provided for in the applicable rules.

6. CONFIDENTIALITY PROTECTION PROCEDURES

6.1. The Controlling Shareholder, officers, members of the Board of Directors and of the Audit Committee, as well as members of any technical or consulting bodies created by the Bylaws, when established, in addition to the other employees and agents of the Company, shall protect the confidentiality of the confidential information pertaining to the Relevant Facts or Acts to which they have privileged access due to their role or position, refraining from using this information to take advantages for themselves or third parties, always following the procedures set forth in this Section 6, until it is actually disclosed to the market, and they shall also cause their subordinates and entrusted third parties to do so, being jointly and severally liable with them for any violation.

6.1.1. For the purposes of this Policy, among the third parties mentioned in Clause 6.1 above are people who may be aware of information relating to Relevant Facts or Acts, such as consultants, independent auditors, and advisors.

6.1.2. The person subject to the duty of confidentiality that leaves the Company or stops participating in the business or project to which the Relevant Facts or Acts refers to will continue to be subject to the confidentiality until the information is disclosed to the market and to the relevant authorities.

6.2. For the purpose of protecting the confidentiality as mentioned in Clause 6.1 above, the people mentioned therein must observe and cause others to observe the following procedures, without prejudice to the adoption of other measures that may be appropriate in each situation:

- (i) Disclosing confidential information strictly to the people for whom the information is indispensable.
- (ii) Not discussing the confidential information in the presence of third parties that are not aware of it, even if these third parties are not expected to understand the meaning of the conversation.
- (iii) Not discussing the confidential information on conference calls open to the investors in general.
- (iv) Storing the documents of any kind referring to the confidential information, including personal handwritten notes, at locations that are only accessible to people who are authorized to know the information.



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- (v) Generating electronic documents and files, regarding the confidential information, always password protected.
- (vi) Not disclosing internally the documents containing confidential information, which must always be delivered directly to the recipient.
- (vii) Not sending documents containing confidential information via fac-simile, unless it is certain that only the person authorized to know the information will have access to the receiving device.
- (viii) Without prejudice to the responsibility of whoever is sharing the confidential information, demanding that a third party that is external to the Company and that needs to have access to confidential information to sign a non-disclosure agreement, in which must be specified the nature of the information and contain a statement in which the third party acknowledges its confidential nature, undertaking not to disclose it to other people and not to trade the Securities before the information is disclosed to the market.

6.3. When the confidential information must be disclosed to an employee or agent of the Company or to another person with a role, function or position at the Company, its controlling companies, controlled companies, or affiliates, other than an officer, member of the Board of Directors or of the Audit Committee of the Company, the persons responsible for sending the information must make sure that the person receiving it is aware of this Policy, also demanding the execution of the instrument contained in **Annex B** before granting access to the information.

7. MONITORING THE DISCLOSURE POLICY

- 7.1. The Investor Relations Officer is responsible for checking, in light of a Relevant Fact or Act, the proper compliance with this Policy, immediately reporting any irregularity to the Board of Directors.
- 7.2. In any of the events mentioned in Clause 5.2 above that lead to the need to disclose a Relevant Fact or Act kept confidential, or in the case of breach of confidentiality of the Relevant Fact or Act before its disclosure to the market, the Investor Relations Officer shall investigate and take internal measures in the Company, talking to the people involved, who must always respond to the information requests, in order to verify what caused the breach of the information's confidentiality.
 - 7.2.1. The findings of the Investor Relations Officer must be sent to the Board of Directors for the applicable measures, including recommendations and suggestions of amendments to this Policy that may, in the future, prevent the breach of confidential information.
- 7.3. The Investor Relations Officer shall monitor the trade of Securities, adopting procedures so that the negotiations that occur before the disclosure of Relevant Fact or Act to the market are reported to him/her, with the purpose of identifying trades banned by the legislation in force or involving people who are aware of such Relevant Fact or Act, reporting any irregularities to the Board of Directors and to the CVM.

8. AMENDMENT TO THE DISCLOSURE POLICY



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- 8.1. By means of a Board of Directors' resolution, this Policy may be amended in the following events:
- (i) When CVM expressly orders so.
 - (ii) If there are amendments to the applicable legal and regulatory rules, so as to implement the adaptations that may be necessary.
 - (iii) When the Board of Directors identifies that the amendment is necessary, in the process of assessment of the procedures adopted.
- 8.2. Amendments to this Policy must be reported to the CVM and Market Entities by the Investor Relations Officer, as required by the applicable regulations, as well as to the people listed in Clause 12.1.3 below.

9. PROCEDURES TO REPORT INFORMATION ON MANAGERS' NEGOTIATIONS

- 9.1. The officers, members of the Board of Directors and of the Audit Committee, as well as members of any technical or consulting bodies of the Company created by the Bylaws, shall mandatorily inform the Company of the ownership of Securities, as well as trades carried out with Securities issued by the Company, its controlling or controlled companies, provided those, in these last two cases, are publicly held companies.
- 9.1.1. The notification mentioned in Clause 9.1 above must encompass the negotiations with derivatives or any other securities referred to in the Securities issued by the Company or its controlling or controlled companies, provided those, in these last two cases, are publicly held companies.
- 9.1.2. The natural persons mentioned in Clause 9.1 above will also indicate the Securities owned by a spouse (not judicially or extrajudicially separated), a partner or any dependent included in their annual tax return, and by companies they directly or indirectly control.
- 9.1.3. The notification is to be sent to the Investor Relations Officer, who will report it to the CVM and Market Entities, as per the template form contained in **Annex C** of this Policy.
- 9.1.4. The notification to the Investor Relations Officer must be sent (i) in five (5) days after each deal; (ii) on the first Business Day after taking office, in this case, both for the purpose of ownership and for negotiations with Securities issued by the Company, its controlling and controlled companies, provided they are publicly held companies; or (iii) in up to fifteen (15) days counted from the respective amendment, when the list containing the name and number of the National Register of Legal Entities (CNPJ) or Individual Taxpayers' Register (CPF) of the people mentioned in Clause 9.1.2 above is amended.

10. NOTIFICATION AND DISCLOSURE PROCEDURES FOR RELEVANT NEGOTIATIONS

- 10.1. The Controlling Shareholder, the shareholders who elect the members of the Board of Directors or of the Audit Committee of the Company, as well as any person or group of natural persons or legal entities, acting



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jointly or representing the same interest, shall report Relevant Negotiations to the Company, including the information mentioned in the template form contained in **Annex D** of this Policy.

10.1.1. The notification about Relevant Negotiations must be sent to the Investor Relations Officer immediately after the shareholdings mentioned in the definition are achieved.

10.2. The Investor Relations Officer will be responsible for submitting the information, as soon as the Company receives it, to the CVM and Market Entities, if applicable, as per Clause 9 above.

10.3. In cases the purchase mentioned in Clause 10.1.1 above leads to or has been made with the purpose of changing the control or administrative structure of the Company, as well as in cases the referred purchase creates the obligation to make a public offer, in accordance with the applicable regulations, the purchaser shall also publish a warning containing the information set forth in **Annex D** of this Policy, using at least the same communication channels used by the Company, as described herein.

11. VIOLATIONS AND PENALTIES

11.1. Without prejudice to the applicable sanctions, as per the legislation in force, to be imposed by the relevant authorities, in the case of violation of the terms and procedures set forth herein, the Board of Directors shall take the applicable disciplinary measures within the Company, including removing or dismissing the infringer in case of a serious violation, as per Law 6,385, of December 7, 1976, as amended.

11.2. If the infringer is a third party, this will characterize a contractual breach, and the Company may, at no charge, terminate the respective agreement and demand the payment of a fine set forth therein, without prejudice and damages.

11.3. If the applicable measure is under the authority of the general meeting by virtue of the law or Bylaws, the Board of Directors must call a general meeting to resolve on the matter.

12. GENERAL PROVISIONS

12.1. The Company must send a copy of this Policy, by registered letter or email with return receipt requested, to the Controlling Shareholder, officers, members of the Board of Directors, and members of the Audit Committee, when established, as well as to anyone who, by virtue of their role or position at the Company, its controlling, controlled, or affiliated companies, may know the information about the Relevant Fact or Act, requesting that they send to the Company a duly signed instrument of adherence, as per **Annex B** of this Policy, which will be filed at the Company's head office.

12.1.1. Upon execution of the instrument of investiture of the new managers of the Company, they must be required to sign the instrument contained in **Annex B**, and they must be informed of this Policy.

12.1.2. The notification of this Policy and the requirement of execution of the instrument contained in **Annex B**, regarding the people mentioned in Clause 12.1 above, shall happen before these people become aware of a Relevant Fact or Act, as per Clause 6.3 above.



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12.1.3. The instrument contained in **Annex B** must be filed at the Company's head office for as long as the people mentioned in Clause 12.1 above maintain their connection to it, and for at least five years after the termination of their contracts.

12.1.4. The Company will keep at its head office, available for the CVM, the list of people covered by Clause 12.1 above and their respective qualifications, indicating their role or position, address, number of the National Register of Legal Entities (CNPJ) or Individual Taxpayers' Register (CPF), updating it immediately whenever there are changes.

12.2. Any questions about this Policy's provisions must be clarified with the Investor Relations Officer.

13. POLICY TERM

13.1. This Policy will enter in force on the date it is approved and may only be amended upon resolution by the Company's Board of Directors, and it may be found at www.ambipar.com/ri.



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ANNEX A

1. Execution of the Company's controlling interest transfer agreement or contract, even if under a suspensive or resolutive condition.
2. Change in the Company's control, including through the execution, amendment to, or termination of a shareholders' agreement.
3. Execution, amendment to, or termination of a shareholders' agreement to which the Company is part of or an intervening party, or that has been entered into the Company's book.
4. Admission or withdrawal of a shareholder that has an agreement or operational, financial, technological, or administrative cooperation with the Company.
5. Authorization to trade securities issued by the Company in any national or foreign market.
6. Decision to cancel the registration as a publicly held company.
7. Merger, consolidation, or spin-off involving the Company or related companies.
8. Conversion or dissolution of the Company.
9. Change in the structure of the Company's assets.
10. Change in accounting criteria.
11. Renegotiation of debts.
12. Approval of a call options plan.
13. Amendment to the rights and advantages of securities issued by the Company.
14. Stock split or grouping, or assignment of a bonus.
15. Purchase of Company's shares to keep them in treasury, or cancelation and transfer of ownership of shares purchased this way.
16. Company's profit or loss and cash remuneration.
17. Execution or termination of an agreement, or failure to execute an agreement when it is publicly expected to be executed.
18. Approval, amendment to, or withdrawal from a project, or delay in its implementation.
19. Beginning, resumption, or interruption of the production or sale of a product or provision of a service.
20. Discovery, change, or development of Company's technology or resources.
21. Change in projections disclosed by the Company.
22. Filing for judicial or extrajudicial reorganization, filing for bankruptcy, or filing a lawsuit, administrative or arbitration proceedings that may affect the economic and financial situation of the Company.



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ANNEX B

INSTRUMENT OF ADHERENCE TO THE POLICY REGARDING DISCLOSURE OF RELEVANT FACT OR ACT OF AMBIPAR PARTICIPAÇÕES E EMPREENDIMENTOS S.A.

By this instrument, [NAME OR TRADE NAME], [QUALIFICATION - NATIONALITY, MARITAL STATUS, PROFESSION, ID CARD/ID CARD FOR FOREIGNERS (RNE), IF A NATURAL PERSON; CORPORATE TYPE, IF A LEGAL ENTITY], with address at [ADDRESS], enrolled on [Individual Taxpayers' Register (CPF) or Corporate Taxpayers' Register (CNPJ)] under No. [NUMBER], as [POSITION HELD OR "CONTROLLING SHAREHOLDER"] at **AMBIPAR PARTICIPAÇÕES E EMPREENDIMENTOS S.A.**, a joint-stock company with its headquarters in the city of São Paulo, state of São Paulo, at Avenida Pacaembu, No. 1088, Zip Code 01234-000, Pacaembu, enrolled on Corporate Taxpayers' Register (CNPJ/ME) under No. 12.648.266/0001-24 ("Company"), hereby declares to be aware of the "*Company's Policy Regarding Disclosure of Relevant Fact or Act*", approved by the Board of Directors on [•] [•], 2020, as per CVM Instruction 358, of January 3, 2002, as amended, undertaking to comply with the standards and procedures provided for in such document and guide its actions related to the Company always in accordance with such provisions.

[PLACE], [•] [•], [•].

Name:

Position:



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ANNEX C

NEGOTIATIONS WITH SECURITIES ISSUED BY THE COMPANY AND ITS CONTROLLED AND/OR CONTROLLING COMPANIES THAT ARE PUBLICLY HELD COMPANIES

(ARTICLE 11 OF CVM INSTRUCTION 358)

Period: <i>[month/year]</i>	
Name of Purchaser or Seller:	
Qualification:	CNPJ/CPF:
Transaction date:	
Issuer:	
Type of transaction:	
Type of Security:	
Total number:	
Number per type and class:	
Balance of the shareholding before the transaction (direct or indirect):	
Balance of the shareholding after the transaction (direct or indirect):	
Form of purchase/disposal:	
Price:	
Broker:	
Other relevant information:	



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ANNEX D

RELEVANT NEGOTIATION

(ARTICLE 12 OF CVM INSTRUCTION 358)

Period: *[month/year]*

Name of Purchaser or Seller:

Qualification:

CNPJ/CPF:

Transaction date:

Type of transaction:

Type of Security:

Purpose of the shareholding:

Target number:

If applicable, a statement from the purchaser that his/her purchases are not aimed at changing the control or administrative structure of the Company:

Number of shares and other securities and derivatives referred to in such shares (number, class, and type):

Agreement or contract governing the exercise of the voting rights, or the purchase and sale of securities issued by the Company:

Shareholder who resides or is domiciled abroad:

Name/Agent's Corporate Name/Legal Representative:

CNPJ/CPF:

Other relevant information: