

Corporate Policy for Disclosure of Material Act or Fact

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1. PURPOSE

1.1. This Corporate Policy for Disclosure of Material Act or Fact of Votorantim Cimentos S.A. ("VCSA" or "Company") ("Policy") was prepared in accordance with the applicable legislation, in particular Law nº 6.404, dated as of December 15th, 1976, as amended ("Brazilian Corporation Law") and Resolution of the Brazilian Securities and Exchange Commission ("CVM") nº 44, dated as of August 23rd, 2021, as amended ("CVM Resolution 44").

1.2. This Policy aims to establish the rules and procedures to contribute to compliance with laws and rules that prohibit the practice of misuse of Inside Information (as defined below). The rules and procedures must be observed and applied by the Related Persons (as defined below) in the disclosure of a Material Act or Fact (as defined below), aiming at the following basic principles: (i) transparency, breadth and symmetry of information, fairness of treatment and respect for investor rights; (ii) adherence to best global investor relations practices; (iii) good faith, loyalty and truthfulness; (iv) use of means to prevent the misuse of Inside Information (as defined below); and (v) compliance with the specific legislation of Brazil, including, but not limited to, CVM regulations, and the rules of Market Entities (as defined below).

1.3. Any doubts about the provisions of the Policy, the applicable regulations issued by CVM and/or regarding the need to disclose or not certain information to the public must be clarified with the IRO (as defined below).

2. SCOPE

2.1. The rules and procedures established in this Policy must be observed by Related Persons (as defined below), who must assume the obligation to comply with them and ensure that they are complied with by their subordinates, third parties of their trust, as well as by Affiliated Persons (as defined below) who have access to relevant information not yet disclosed or to inside information. Also, this Policy also applies to any Related Person that may be dismissed before the public disclosure of a business or fact initiated during its management period and shall extend until the Inside Information is disclosed to the market and to the competent bodies.

2.2. Individuals subject to this Policy shall guide their conduct in accordance with the basic principles mentioned in item 1.2 above, as well as the rules established (i) in this Policy; (ii) in the corporate governance guidelines of the Company's Articles of Incorporation; (iii) in the Company's Code of Conduct; and (iv) when applicable, in the Novo Mercado (New Market) Regulation.

3. DEFINITIONS

3.1. In addition to the terms defined above, capitalized terms used in this Policy have the meaning assigned to them below:

"Controlling Shareholders" or "Controlling Company": means the shareholder or group of shareholders related by a shareholders' agreement or under common control that (i) holds the ownership of shareholder/partner rights that permanently ensure preponderance in corporate resolutions and the power to elect the majority of directors; and (ii) effectively exercise the power of control and direction of the corporate activities, guiding the operation of the bodies of the company or entity, under the terms of the Brazilian Corporation Law.

"Management": means the VCSA' statutory officers, members of the Board of Directors, members of the Fiscal Council and any bodies with technical or advisory functions, created by the Board of Directors or to be created by statutory provision (including alternates), as applicable, of a company or entity.

"Material Act or Fact" or "Material Acts or Facts": means any decision of Controlling Shareholders, resolution of the general meeting or the Company's management bodies or its subsidiaries, or any other act or fact of a political-administrative, technical, business or economic-financial nature, occurred or related to the Company's business and subsidiaries, which may significantly influence: (i) in the quotation of the Securities; (ii) in the decision of investors to buy, sell or hold the Securities; or (iii) in the decision of investors to exercise any rights inherent to the condition of holder of Securities.

"Board of Directors" means the Company's board of directors.

"Fiscal Council": means the Company's fiscal council.

"Officers": means the statutory officers of the Company.

"Board of Officers": means the Company's statutory executive board.

"IRO": means the Investor Relations Officer or the Company's executive officer who performs this function.

"Market Entities": means all stock exchanges or organized over-the-counter market entities in which Securities are or will be admitted to trading, as well as equivalent entities in other countries.

"Employees and Associates": means the Company's employees and executives, as well as any persons who, by virtue of their position or title in the Company, or in its subsidiaries and affiliates, have access to any Inside Information.

"Inside Information": means the Material Acts or Facts not yet disclosed to CVM, to the Market Entities, and, simultaneously, to the market in general.

"Quiet Period": meaning defined in item 4.6.1 below.

"Affiliated Persons": means persons who maintain the following links with Related Persons, as applicable: (i) the spouse, from whom is not legally separated; (ii) the partner; (iii) any dependent included in the annual income tax form; or (iv) companies controlled, directly or indirectly, by Related Persons or other Affiliated Persons.

"Related Persons": means (i) the Company; (ii) the Management and Shareholders (direct or indirect); (iii) the Employees and Associates; (iv) the members of bodies with technical or advisory functions of the Company, created by statutory provisions or by resolution of the Board of Directors; and (v) anyone who, by virtue of their position, function or title in the Company, in the Controlling Company and in the Subsidiaries, is aware of information that may constitute a Material Act or Fact on the Company and its subsidiaries.

"Term of Adhesion": means the term of adhesion to this Policy, to be signed according to the model contained in Attachment I of this Policy, pursuant to article 17, paragraph 1 of CVM Resolution 44.

"Securities": means any shares, debentures, subscription warrants, receipts and subscription rights, promissory notes, call or put options, indices and derivatives of any kind or any other securities or collective investment contracts issued by the Company, or referenced thereto, including, but not limited to receivables certificates, and any securities convertible into shares and certificates of deposits of shares issued in the country and abroad.

4. DISCLOSURE OF INFORMATION

4.1. Material Acts or Facts

4.1.1. The events to be considered as a Material Act or Fact must have their materiality analyzed in the context of (i) the development of the Company's economic activities; (ii) the dimension, economic size and revenue of the Company; (iii) the sector specificity, concreteness or strategic importance; and (iv) the information previously disclosed by the Company, in order to avoid the trivialization of the disclosures of Material Acts or Facts to the detriment of the quality of analysis, by the market and public in general, of the Company's prospects.

4.1.2. Article 2 of CVM Resolution 44 contains a list of examples of situations that may constitute a Material Act or Fact, and the IRO is liable for analyzing such a situation based on the criteria established in item 4.1 above.

4.1.3. Examples of facts that potentially can be considered as a Material Act or Fact, according to article 2 of CVM Resolution 44: (i) signing of an agreement or contract to transfer the Company's shareholding control, even if under suspensive or resolute condition; (ii) change in the Company's control, including through the execution, amendment or termination of a shareholders' agreement; (iii) execution, amendment or termination of a shareholders' agreement to which the Company is a party or intervening party, or which has been recorded in the Company's own book; (iv) entry or exit of a member who maintains, with the Company, an operational, financial, technological or administrative contract or collaboration; (v) authorization to trade the Securities; (vi) decision to cancel the Company's registration as a publicly-held company; (vii) incorporation, merger or spin-off involving the Company or related companies; (viii) transformation or dissolution of the Company; (ix) change in the composition of the Company's equity; (x) change in accounting criteria; (xi) debt renegotiation; (xii) approval of the Company's stock option grant plan; (xiii) change in the rights and advantages of the Securities; (xiv) splitting or grouping of shares or attribution of bonus of the Company; (xv) acquisition of Securities for permanence in treasury or cancellation and disposal of Securities thus acquired; (xvi) profit or loss of the Company and the attribution of cash proceeds; (xvii) execution or termination of a contract, or failure to perform it, when the expectation of materialization is public knowledge; (xviii) approval, change or withdrawal of a project or delay in its implementation; (xix) start, resumption or stoppage of the manufacture or commercialization of a product or the provision of a service; (xx) discovery, change or development of technology or resources of the Company; (xxi) modification of projections disclosed by the Company; and (xxii) request for judicial or extrajudicial reorganization, bankruptcy application or filing of a lawsuit, administrative or arbitration proceeding that may affect the Company's economic and financial situation.

4.1.4. It shall not constitute a Material Act or Fact, for the purposes of this Policy, the mere prospection of investment or business opportunities by the Company or its subsidiaries, even if they involve the conclusion of confidentiality agreements, which must be kept under strict secrecy by the Related Persons.

4.1.5. If the Company deems that certain information or event does not fit, conceptually, as a

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Material Act or Fact, but is of interest to shareholders or the market in general, it shall be disclosed through a notice to the market or other forms of communication to investors and the market in general.

4.2. Restriction of Access to Information Related to a Material Act or Fact.

4.2.1. Access to information on Material Act or Fact, prior to its public disclosure, is limited to professionals directly involved with the matter at hand. These professionals must properly hold this information, keep it confidential until its public disclosure and ensure that their subordinates and trusted third parties also do so, responding jointly with them in the event of non-compliance. The aforementioned professionals are also subject to non-disclosure commitments with the Company.

4.3. Exception to Immediate Disclosure

4.3.1. The Material Acts or Facts may exceptionally not be disclosed to the market when the Controlling Shareholders or the Management, as the case, understand that their disclosure shall jeopardize the Company's legitimate interests.

4.3.2. The Company may submit to CVM its decision to, exceptionally, keep confidential Material Acts or Facts whose disclosure it deems to represent a risk to the Company's legitimate interests.

4.3.3. The Controlling Shareholders or the Management, through the IRO, as the case, are obliged to immediately disclose to the market the Material Act or Fact if the information goes beyond control or if there is an unusual fluctuation in the quotation, price or traded quantity of the Securities.

4.4. Disclosure Procedure

4.4.1. The disclosure of a Material Act or Fact shall be made (i) to CVM, through the electronic system available on CVM's website on the world wide web; (ii) electronically to Market Entities, if applicable; and (iii) to the general market (a) through the Company's world wide web page (<https://ri.votorantimcimentos.com.br>); and (b) by one of the following communication channels: (b.1) mass-circulation newspaper commonly used by the Company; or (b.2) news portal with a page on the world wide web which makes available, in a section available for free access, the information in its entirety. The disclosures referred to in this Policy shall be made in Portuguese and English languages.

4.4.2. The disclosure of Material Acts or Facts shall occur, whenever possible, prior to the commencement or after the closing of trading session in the Market Entities.

4.4.3. If disclosure is necessary before the opening of the trading session, it must be observed, whenever possible, at least 30 (thirty) minutes in advance, in order to avoid delays in the beginning of negotiations and allow the dissemination of the information provided.

4.4.4. If it is imperative that the disclosure of a Material Act or Fact occurs during trading hours, the IRO must communicate the Material Act or Fact to the CVM and the Market Entities, as applicable and, if necessary, request, always simultaneously, the Market Entities to suspend the trading of the Securities, for the time necessary for their proper dissemination.

4.4.5. If the Controlling Shareholders and/or the Management have personal knowledge of relevant information and verify the omission of the IRO in the fulfillment of their duty of communication and disclosure, under the terms of this Policy, they must notify it in writing so that disclosure can be made. Such Controlling Shareholders and/or the Management are only exempt from liability if they immediately communicate the Material Act or Fact to CVM.

4.4.6. The disclosure and communication to the market of Material Acts or Facts must be carried out in a clear, precise, objective, reliable, and timely manner, with quality, transparency, veracity, completeness and consistency, in language accessible to the investing public.

4.4.7. Any change in the communication channel used by the Company indicated in item 4.4.1 above must be preceded by: (i) updating of this Policy, pursuant to CVM Resolution 44; (ii) updating the Company's Registration Form; and (iii) disclosure of the change implemented, as previously used for disclosure of Material Acts or Facts.

4.5. Quarterly and Annual Results Disclosure

4.5.1. The Related Persons and other professionals involved in the preparation and approval of the financial statements by the Executive Board and Board of Directors, in the period prior to the delivery of such information to CVM and Market Entities must keep confidential about the inside information until its public disclosure.

4.5.2. Prior to its public disclosure, the access to any Inside Information is limited to professionals directly involved with the subject at hand. These professionals must properly store this information, keep it confidential until its public disclosure and ensure that their subordinates and trusted third parties also do so.

4.6. Quiet Period

4.6.1. In accordance with current legislation and regulations, the Company shall refrain from internally or publicly disclosing information about its results to those other than professionals involved in the preparation, analysis and approval of such financial statements by the Board of Officers and Board of Directors in the period prior to the delivery of this information to CVM and Market Entities ("Quiet Period").

4.6.2. The Company adopts, in accordance with best market practices, the Quiet Period from the 15th (fifteenth) day prior to the disclosure of the annual financial statements and quarterly statements, in order to ensure the fairness of treatment of information to the investing public.

4.6.3. In addition, as provided for in the applicable legislation, the Company shall internally declare a Quiet Period for Related Persons during periods in which public offerings of distribution of Securities are in progress, with such Related Persons refraining from commenting on said operations at public meetings, conferences and press interviews during the Quiet Period.

4.7. Public Offering

4.7.1. In the event of a public offering for the distribution of Securities, decided or projected, the Related Persons must comply with the rules for disclosure of information provided for in CVM Resolution nº 160, dated as of July 13th, 2022 and CVM Resolution 44.

4.7.2. The Related Persons shall also observe rules of foreign law relating to prohibitions and other limitations on disclosure of information in the context of a public offering for the distribution of Securities, according to guidelines of legal counsel in foreign law, whenever applicable.

4.8. Conference Calls/Simultaneous Broadcasts and Meetings with Analysts and Investors

4.8.1. The attendance to investors and investment analysts shall always be made by the IRO and/or by a representative of the Company's Investor Relations area, who may invite other Directors and Company's executives to accompany them.

4.8.2. Conference calls or simultaneous broadcasts may be held after the disclosure of results or whenever necessary, at the discretion of the IRO. The realization of these events shall be previously announced to the market with indication of date, time and data for connection and shall be recorded and made available on the Company's world wide web page (<https://ri.votorantimcimentos.com.br/en/>).

4.8.3. The Company may also hold public presentations, in Brazil or abroad, conferences, roadshows or events promoted by capital market entities, by financial institutions or by its Directors' own decision, regardless of whether or not there is an issue of Securities in progress.

4.8.4. The presentations prepared by the Company for use in the context of the events mentioned in item 4.8.3 above shall be forwarded to CVM and Market Entities and made available on the Company's world wide web page (<https://ri.votorantimcimentos.com.br/en/>).

4.9. Projections

4.9.1. The disclosure of projections is information of a relevant nature, subject to the provisions of CVM Resolution 44. The disclosure of projections and estimates is optional and, when the Company decides to disclose them, they must be: (i) included in the reference form; (ii) identified as hypothetical data that does not constitute performance promise, (iii) reasonable; and (iv) follow by the relevant assumptions, parameters and methodology adopted.

4.9.2. It is not Company's policy to disclose comments on the results' projections and reports prepared by investment analysts. However, the IRO may provide investment analysts and the market in general with information it deems relevant to enable the preparation of an adequate valuation of the Securities, and may, for this purpose, comment on the facts and assumptions followed in the models taken by such analysts. The conclusions reached by such analysts in their reports shall not be subject to comment. The Company shall not circulate to any interested party or endorse any report that has been prepared by investment analysts.

4.10. Disclosure on Acquisition or Disposal of Material Equity Interest

4.10.1. The Controlling Shareholders, direct or indirect, and the shareholders who elect members of the Board of Directors or the Fiscal Council, when installed, as well as any individual or legal entity, or group of persons, acting jointly or representing the same interest, who carry out relevant negotiations, pursuant to CVM Resolution 44, must send to the Company, immediately after said negotiation, a communication with the information established in article 12 of CVM Resolution 44, observing that such obligation also extends (i) to the acquisition of any rights over the shares and other securities mentioned therein; and (ii) to the execution of any derivative financial instruments referenced in shares referred to herein, even if without provision for physical settlement.

4.10.2. In cases where the acquisition results or has been carried out with the purpose of changing the Company's control composition or the administrative structure, as well as in cases in which the acquisition generates the obligation to carry out a public offer for the acquisition of shares, under the terms of the applicable regulations, the acquirer must also promote the disclosure, at least through the same communication channels provided for in item 4.4 above, of a notice containing the information provided for in article 12 of CVM Resolution 44.

4.10.3. The IRO is the person liable for transmitting the information, through the Company's Investor Relations area, as soon as it is received by the Company, to CVM and, when necessary, to the Market Entities.

5. PROCEDURES TO PRESERVE CONFIDENTIALITY

5.1. The IRO and/or the Investor Relations area must always be informed of any Material Act or Fact kept confidential, being the responsibility of the IRO to ensure the adoption of appropriate procedures for maintaining confidentiality, together with other people who are aware of such information.

5.2. The Related Persons shall preserve the confidentiality of Inside Information pertinent to Material Acts or Facts to which they have privileged access not using such information to obtain an advantage for themselves or others, always respecting the procedures established in this section of the Policy, until its effective disclosure to the market, as well as ensuring that subordinates and third parties of their trust also do so, being jointly and severally liable with them in the event of non-compliance.

5.3. The individual subject to the duty of confidentiality who dismiss from the Company, or who ceases to participate in the business or project to which the Material Acts or Facts refer, shall continue to be subject to secrecy until the Inside Information is disclosed to the market and to the competent bodies.

5.4. For the purpose of preserving the secrecy referred to in this section of the Policy, the persons mentioned therein must observe and ensure compliance with the following procedures, without prejudice to the adoption of other measures that are appropriate in the face of each concrete situation:

- (i) disclose the Inside Information strictly to those people who absolutely need to know it;
- (ii) not discuss the Inside Information in the presence of third parties who are not aware of it, even if it can be expected that said third party cannot intuit the meaning of the conversation;
- (iii) not discuss the Inside Information in conference calls open to the general investing public;
- (iv) keep documents of any kind referring to the Inside Information (including handwritten personal notes) in a place to which only persons authorized to know the information have access; and
- (v) without prejudice to the responsibility of the one who is transmitting the Inside Information, require a third party external to the Company that needs to have access to the information to sign a confidentiality agreement, in which the nature of the information must be specified and include the statement that the third party recognizes its confidential nature, undertaking not to disclose it to any other person and not to trade with Securities before the disclosure of the information to the market.

5.5. When the Inside Information needs to be disclosed to a third party that has a business, professional or trust relationship with the Company, as well as to Employees and Associates or to any another person who holds a position, function or title or has an employment contract with the Company, its controllers, subsidiaries or affiliates, the person receiving it shall need to declare that they are aware of this Policy.

5.6. The Related Persons must also:

- (i) not use Inside Information to obtain, directly or indirectly, for itself or third parties, any pecuniary advantages, including through the purchase or sale of Securities, or referenced thereto; and
- (ii) ensure that the violation of the provisions of the item above cannot occur through direct subordinate or third parties of its trust, responding jointly with them in the event of non-compliance.

5.7. Related Persons who, inadvertently or without authorization, communicate Inside Information to anyone who is not a Related Person before its disclosure to the market (including if the communication is made by third parties), must immediately inform the IRO of such act so that it takes the appropriate measures.

6. MAIN RESPONSIBILITIES

6.1. From IRO:

- (iii) main responsible for the disclosure of information regarding Material Acts or Facts and for the execution and monitoring of this Policy, as well as to resolve any doubts of Related Persons as regards the provisions of this Policy, the applicable regulations and/or the need to disclose or not certain information to the public;
- (iv) disclose and communicate to CVM and Market Entities, any Material Act or Fact occurred or related to the Company's business, or its subsidiaries and affiliates, immediately after its occurrence; ensuring its wide and immediate dissemination, simultaneously in all markets in which the Securities are admitted for trading;
- (v) provide any requested information, in case CVM or the Market Entities may require additional clarifications to the communication and disclosure of a Material Act or Fact;
- (vi) rigorously analyze the concrete situations that may arise in the course of the Company's operations, always considering their materiality, sector specificity, concreteness or strategic importance, in order to verify whether or not such situations constitute a Material Act or Fact;
- (vii) if there is a leak of Inside Information or the publication of news that adds a new fact about an information already disclosed, analyze the potential impact of the news on the negotiations and, if applicable, immediately manifest itself regarding said news, through the electronic system available on CVM web page on the world wide web and, if this is the case, communicate to the Market Entities;
- (viii) if there is an atypical fluctuation in the quotation, price or traded quantity of the Securities, inquire individuals with access to a Material Act or Fact to verify if they are aware of information that must be disclosed to the market and, if so, ensure that the information is immediately disclosed to the market according to this Policy, and must keep a record of this procedure;

- (ix) assess the need to request, always simultaneously to the Market Entities, the suspension of the Securities' trading, for the time necessary for the proper dissemination of the Material Act or Fact;
- (x) transmit the information on relevant shareholding negotiations, as soon as they are received by the Company, to CVM and B3, as well as update the corresponding section of the Reference Form within a maximum of 7 (seven) business days;
- (xi) transmit to CVM the information received on negotiations carried out by the members of the Board of Directors and its advisory committees, individually and consolidated, as the case may be, within 10 (ten) days after the end of the month in which the negotiation occurs, or of the month in which the investiture occurs in the position, being certain that the consolidated form will be available on the Company's Investor Relations website; and
- (xii) transmit to CVM the information on the securities traded by the Company itself or its subsidiaries and affiliates, within 10 (ten) days after the end of the month in which the trading occurs, being certain that such information will be available on the Company's Investor Relations website.

7. FINAL PROVISIONS

7.1. The Company shall take all measures to obtain the formal adhesion of the persons who must comply with this Policy, in the form of the Term of Adhesion.

7.2. The IRO is the person liable for the execution and monitoring of this Policy. Any doubts about the provisions of this Policy must be clarified with the IRO and/or with the Company's Investor Relations area.

7.3. The violation of the provisions set forth in this Policy shall constitute a serious infraction, for the purposes set forth in Law nº 6.385, dated as of December 7th, 1976, as amended, and the offender shall be subject to the penalties that may be applied by CVM, without prejudice to the disciplinary and legal sanctions that may be applied by the Company itself.

7.4. This Policy shall enter into force on the date of its approval by the Board of Directors.

8. ATTACHMENT

Attachment I – Term of Adhesion

ATTACHMENT I**TERM OF ADHESION TO THE CORPORATE POLICY FOR DISCLOSURE OF MATERIAL ACT OR FACT**

By this instrument, for the purposes and effects of CVM Resolution nº 44, dated as of August 23rd, 2021, as amended ("CVM Resolution 44"), [insert name and qualification], resident and domiciled at [full address], registered in the [Individual Taxpayer's Registration of the Ministry of Finance] under nº [•] and bearer of the Identity Card [please, determine whether it is Identity Card Number or RNE (Foreigner Registration Card)] under nº [insert number and issuing agency], in the capacity of [indicate the position, function or relationship with the Company] of [company], a corporation headquartered at [insert address], enrolled in the National Registry of Legal Entities of the Ministry of Finance under nº [insert CNPJ], hereby declares: (i) to be fully aware of the rules established by the Corporate Policy for Disclosure of Material Act or Fact of Votorantim Cimentos S.A. ("VCSA" or "Company") ("Policy"), a copy of which was received; (ii) expressly assume the obligation to faithfully observe such rules while maintaining its bond with the Company and for 6 (six) months after its termination, to observe and guide its actions in accordance with the provisions contained in said Policy, as well as in CVM Resolution 44/2021; and (iii) be aware that the violation of the provisions set forth in this Policy shall subject the offender to the penalties that may be applied by CVM, without prejudice to the disciplinary and legal sanctions that may be applied by the Company itself.

It also declares to be fully aware that any change in its registration data, as well as the securities issued by VCSA or its publicly-held subsidiaries, or referred to them, must be communicated, in writing and within the deadlines provided for in the Policy, without prejudice to communication to the other competent bodies.

The Declarant signs this Term in 3 (three) copies of equal content and form, in the presence of 2 (two) undersigned witnesses.

This term may be signed electronically with the use of a certification process made available by the Brazilian Public Key Infrastructure – ICP-Brasil and shall produce all its effects in relation to the signatory, according to paragraph 1 of article 10 of Provisional Measure n.º 2.200-2, dated as of 08/24/2001, of which the signatory declares to have full knowledge.

[insert the place and date of the signing]

[insert declarant's name]

Witnesses:

Name:

ID (Identity Card):

Name:

ID (Identity Card):