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1. PURPOSE

- 1.1. This "Material Act or Fact Disclosure Policy" of **MITRE REALTY EMPREENDIMENTOS E PARTICIPAÇÕES S.A.**, approved at a meeting of the Company's Board of Directors, is intended to govern the internal procedures to be adopted in order to fully comply with the legal provisions and regulations concerning the disclosure of material act or fact, pursuant to CVM Instruction 358 (as defined below).

2. DEFINITIONS

- 2.1. The following related terms and expressions, when used in this Policy, shall have the following meanings:
- 2.1.1. **"Controlling Shareholder"**: a shareholder or group of shareholders bound by a shareholders' agreement or under common control, who exercises the direct or indirect controlling power of the Company, pursuant to Brazilian Corporation Law.
- 2.1.2. **"Material Act or Fact"**: any decision of the Controlling Shareholder, resolution of the Company's shareholders' meeting or of the management bodies, or any other act or fact of a political-administrative, technical, business or economic-financial nature occurred or related to the Company's business, which may have a significant influence on: **(a)** the price of the Securities; **(b)** the decision of investors to buy, sell or hold those Securities; or **(c)** investors' decision to exercise any rights inherent in their ownership of the Securities, which may potentially include, without limitation, the examples of potentially material acts or facts contained in **Exhibit A** to this Policy.
- 2.1.3. **"Company"**: Mitre Realty Empreendimentos e Participações S.A.
- 2.1.4. **"Board of Directors"**: the Company's board of directors.
- 2.1.5. **"CVM"**: the Brazilian Securities Commission.
- 2.1.6. **"Business Day"**: means any day on which commercial banks are open for business in the city of São Paulo, State of São Paulo.
- 2.1.7. **"Investor Relations Officer"**: the Company's officer elected to perform the duties set forth in CVM's instructions and regulations, including the performance, monitoring and supervision of this Policy.
- 2.1.8. **"Market Entities"**: a set of stock exchanges or organized over-the-counter entities in which the Securities are or shall be admitted to trading, as well as equivalent entities in other countries.
- 2.1.9. **"CVM Instruction 358"**: CVM Instruction No. 358 of January 3, 2002, as amended.
- 2.1.10. **"Brazilian Corporation Law"**: Law No. 6.404 of December 15, 1976, as amended.
- 2.1.11. **"Material Trading"**: business or set of business through which the direct or indirect interest: **(i)** of the Controlling Shareholder, either directly or indirectly; and/or **(ii)** of shareholders who elect members of the Board of Directors or of the Fiscal Council; and/or **(iii)** of any individual or legal entity; and/or **(iv)** of the group of people, acting together or representing the same interest, exceeds, up or down, five percent (5%), ten percent (10%), fifteen percent (15%), and so on, of a type or class of shares representing the Company's capital stock.
- 2.1.12. **"Policy"**: this "Material Act or Fact Disclosure Policy of Mitre Realty Empreendimentos e Participações S.A."
- 2.1.13. **"Securities"**: any shares, convertible or non-convertible debentures, real estate receivables certificates, warrants, receipts and warrant rights, promissory notes, call or put options or derivatives of any kind, or any other securities or collective investment contracts issued by the Company or related to them that, by law, are considered "securities".



3. PRINCIPLES

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

- (i) provide complete information to the Company's shareholders and investors;
- (ii) ensure wide and immediate disclosure of Material Act or Fact;
- (iii) provide equitable access to public information about the Company to all shareholders and investors;
- (iv) ensure the secrecy of any Material Act or Fact not disclosed;
- (v) contribute to the stability and development of the Brazilian capital market; and
- (vi) consolidate good corporate governance practices in the Company.

4. DISCLOSURE PROCEDURES

4.1. The Investor Relations Officer is responsible for the disclosure and communication of Material Act or Fact to the CVM and the Market Entities, as well as for the performance of the other procedures provided for in this Policy.

4.1.1. The Material Act or Fact shall be:

- (a) disseminated through a news portal with web page on the world wide web, which makes available, in a section available for free access, the information in its entirety; and
- (b) made available: (i) on the CVM's periodic and occasional information submission system page (Empresas.Net System); and (ii) on the Company's Investor Relations website (<https://ri.mitrerealty.com.br/>), with content at least identical to that sent to the CVM.

4.1.2. The information contained in the Material Act or Fact shall be presented clearly and precisely, in objective language and accessible to the investors. Whenever a technical concept is used which, at the discretion of the Investor Relations Officer, is considered to be of greater complexity, an explanation of its meaning shall be included in the disclosed information.

4.2. In the event of disclosure of a Material Act or Fact by any means of communication, including information to the press, or at meetings of class entities, investors, analysts or with selected audiences, in Brazil or abroad, the Investor Relations Officer shall simultaneously disclose the respective information to the market, as set forth in this Policy.

4.3. The Controlling Shareholder, the officers, the members of the Board of Directors, of the Fiscal Council and of any bodies with technical or advisory functions, created by provision of the Bylaws, when instated, who have signed the instrument set forth in **Exhibit B**, as well as any Company employee who has access to information on a Material Act or Fact, pursuant to Section 6.3 of this Policy, shall be responsible for communicating to the Investor Relations Officer any Material Act or Fact that may come to their attention and that they know that has not yet come to the attention of the Investor Relations Officer, who shall arrange for its disclosure, pursuant to this Policy.

4.3.1. The persons referred to in Section 4.3 above shall verify that the Investor Relations Officer has taken the steps prescribed in this Policy in relation to the disclosure of the respective information.

4.3.2. Communication to the Investor Relations Officer referred to in Section 4.3 above shall be made by email to: ri@mitrerealty.com.br.

4.3.3. If the persons mentioned in Section 4.3 above note the omission of the Investor Relations Officer in the fulfillment of his/her duty of communication and disclosure, and provided that the confidentiality of the Material



Act or Fact has not been resolved - pursuant to Section 5 of this Policy - such persons shall immediately disclose the Material Act or Fact to the CVM in order to disclaim liability imposed by applicable regulation in the event of non-disclosure.

- 4.4. Whenever the CVM or the Market Entities require from the Investor Relations Officer additional clarifications to the communication and disclosure of a Material Act or Fact, or in case of atypical fluctuation in the quotation, price or traded quantity of the Securities, the Investor Relations Officer should inquire persons with access to Material Acts or Facts, in order to ascertain whether they are aware of information that should be disclosed to the market.
- 4.4.1. Persons inquired pursuant to Section 4.4 above shall respond to the request of the Investor Relations Officer immediately. If they are unable to meet in person or speak by telephone with the Investor Relations Officer on the same day as they become aware of the respective requirement of the CVM or the Market Entities, the persons in question should send an e-mail with the pertinent information to ri@mitrerealty.com.br
- 4.5. The disclosure of a Material Act or Fact shall be made simultaneously to the CVM and the Market Entities, whenever possible one (1) hour before the start or after the close of business in the Market Entities.
- 4.5.1. When the Securities are being traded simultaneously in Brazilian and foreign Market Entities, the disclosure of Material Act or Fact shall be made, whenever possible, one (1) hour before the start or after the close of business in all countries, prevailing, in case of incompatibility, the opening hours of the Brazilian market.
- 4.5.2. If it is imperative that the disclosure of a Material Act or Fact occurs during trading hours, the Investor Relations Officer may, when communicating the Material Act or Fact, request always simultaneously from the Brazilian and foreign Market Entities the suspension of trading of the Securities, for the time necessary for the appropriate dissemination of the respective information.
- 4.6. The Investor Relations Officer shall establish and disclose to the market, in advance in accordance with market standards and in accordance with applicable regulations, the dates on which quarterly, half-yearly or annual results shall be disclosed, duly audited, of the Company.
- 4.7. The Company may adopt the practice to disclose to the market its expectations of future performance (guidance), both short- and long-term, especially as regards the financial and operational aspects of its business, by decision of the Board of Directors.
- 4.7.1. In the event of disclosure of such expectations, the following should be noted:
 - (i) early disclosure of results may be permitted in the case of preliminary, unaudited, clearly presented information for each of the projected items and periods;
 - (ii) such estimates should be reasonable and be accompanied by relevant assumptions, parameters and methodology adopted and identified as hypothetical data not constituting performance promise and reasonable;
 - (iii) the results or information prepared in accordance with foreign accounting standards shall present reconciliation to Brazilian accounting practices, as well as reconciliation with the accounting headings expressed directly in the Company's financial statements and, therefore, obtained by the accounting criteria adopted in Brazil;
 - (iv) if the data submitted is from a third party, the source shall be provided;
 - (v) if the information disclosed involves the preparation of projections, a comparison with the results actually obtained shall be presented upon the disclosure of the Company's Quarterly Information Form (ITR) and Standardized Financial Statements Form (DFP);



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- (vi) projections and estimates disclosed shall be included in the Company’s reference form; and
- (vii) if the disclosed projections are discontinued, this fact shall be informed, together with the reasons that led to the loss of validity, in the form of a Material Act or Fact.

5. EXCEPTION TO DISCLOSURE

- 5.1. Material Acts or Facts may exceptionally cease to be disclosed if the Controlling Shareholder or the Company’s management believes that their disclosure would endanger the Company’s legitimate interest, and the procedures set forth in this Policy must be adopted to ensure the confidentiality of such information.
- 5.2. Notwithstanding Section 5.1 above, the Investor Relations Officer shall immediately disclose the Material Act or Fact kept confidential if the relevant information becomes known, in whole or in part, or if an unusual fluctuation occurs in the quotation, price or quantity traded of securities issued by the Company or referenced to them or, in the event that the CVM or Market Entities decide to disclose.
- 5.3. The Controlling Shareholder or the Board of Directors, through its Chairman, shall request the Investor Relations Officer to immediately disclose the Material Act or Fact kept confidential, in any of the situations mentioned in Section 5.2 above.
 - 5.3.1. If the Investor Relations Officer does not take the necessary measures for the immediate disclosure referred to in Section 5.3 above, it shall be, as applicable, the responsibility of the Controlling Shareholder or the Board of Directors, through its Chairman, the adoption of these measures.
- 5.4. The Investor Relations Officer shall always be informed of any Material Act or Fact kept under confidentiality, being responsible, together with other persons who are aware of such information, for ensuring that appropriate procedures are in place for maintaining confidentiality.
- 5.5. Whenever there is doubt, by those who are aware of a Material Act or Fact kept confidential, of the legitimacy of not disclosing the information, the matter should be submitted to CVM, as provided for in the applicable regulations.

6. PROCEDURES FOR PRESERVATION OF CONFIDENTIALITY

- 6.1. The Controlling Shareholder, the officers, the members of the Board of Directors, the Fiscal Council and any bodies with technical or advisory functions, created by provision under the Bylaws, when instated, in addition to the other employees and agents of the Company, shall preserve the confidentiality of the confidential information pertaining to Material Acts or Facts to which they have privileged access by virtue of the position or office they hold, not using such information to gain advantage for themselves or others, always in accordance with the procedures set forth in this Section 6, until their effective disclosure to the market, as well as ensuring that subordinates and third parties trusted by them also do so, being jointly and severally liable with them in the event of non-compliance.
 - 6.1.1. For purposes of this Policy, the third parties referred to in Section 6.1 above include any persons who may be aware of information regarding Material Acts or Facts, such as consultants, independent auditors and advisors.
 - 6.1.2. A person subject to the duty of confidentiality who leaves the Company, or who ceases to participate in the business or project referred to in the Material Acts or Facts, shall remain subject to confidentiality until such information is disclosed to the market and to the appropriate agencies.
- 6.2. For the purpose of preserving the confidentiality referred to in Section 6.1 above, the persons mentioned therein shall observe and ensure compliance with the following procedures, without prejudice to the adoption of other appropriate measures in view of each specific situation:
 - (i) disclose confidential information strictly to those who need to know it;



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- (ii) not discuss confidential information in the presence of third parties who are unaware of it, even though it may be expected that such third party should not be able to understand the meaning of the conversation;
- (iii) not discuss confidential information at conference calls open to investors at large;
- (iv) keep documents of any kind regarding confidential information, including handwritten personal notes, in a place to which only persons authorized to know the information have access;
- (v) generate electronic documents and files regarding confidential information always protected by password systems;
- (vi) not circulate internally documents containing confidential information, which should always be delivered directly to the addressee;
- (vii) not send documents with confidential information by facsimile unless it is certain that only a person authorized to become aware of the information shall have access to the receiving device; and
- (viii) without prejudice to the liability of the person transmitting the confidential information, require from a third party outside the Company who needs to have access to the information the signing of a confidentiality agreement, which shall specify the nature of the information and include the statement that the third party acknowledges its confidentiality and undertakes not to disclose it to anyone else and not to trade in Securities prior to disclosure of the information to the market.

6.3. When confidential information needs to be disclosed to the Company’s employee or agent or to another person holding a position, role or office in the Company, its controlling shareholders, subsidiaries or affiliates, other than an officer, member of the Company’s Board of Directors or Fiscal Council, the person responsible for transmitting the information should make sure that the person receiving the information is aware of this Policy and require that they sign the instrument set out in **Exhibit B** before giving them access to the information.

7. FOLLOW-UP TO DISCLOSURE POLICY

- 7.1. It is incumbent upon the Investor Relations Officer President to verify, in the event of a Material Act or Fact, the proper compliance with this Policy, immediately informing any irregularity to the Board of Directors.
- 7.2. In the event of any of the events set forth in Section 5.2 above, which entail the need to disclose a Material Act or Fact kept confidential, or a breach of the confidentiality of a Material Act or Fact prior to its disclosure to the market, the Investor Relations Officer shall conduct internal investigations and due diligence at the Company, inquiring the persons involved, who should always respond to their requests for information, in order to verify the reason for the possible breach of the confidentiality of the information.
 - 7.2.1. The conclusions of the Investor Relations Officer shall be forwarded to the Board of Directors, for appropriate actions, accompanied by any recommendations and suggestions for changes to this Policy, which may in the future prevent breach of confidentiality of confidential information.
- 7.3. The Investor Relations Officer shall monitor the trading of Securities, adopting procedures to be informed of the trading that occurs in periods prior to the disclosure to the market of a Material Act or Fact, with the purpose of identifying any trading prohibited by current legislation by persons who were aware of such Material Act or Fact, reporting any irregularities to the Board of Directors and the CVM.

8. CHANGE TO DISCLOSURE POLICY

- 8.1. By resolution of the Board of Directors, this Policy may be amended in case of:
 - (i) determination expressed accordingly by the CVM;



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- (ii) modification of applicable legal and regulatory regulations to implement any necessary adaptations; or
- (iii) verification of the need for its amendment by the Board of Directors in the process of evaluating the effectiveness of the procedures adopted.

8.2. Any amendment to this Policy shall be communicated to the CVM and the Market Entities by the Investor Relations Officer as required by applicable regulations, as well as to persons listed in Section 12.1.3 below.

9. PROCEDURES FOR REPORTING INFORMATION ON MANAGEMENT TRADING

9.1. The officers, the members of the Board of Directors, the Fiscal Council and any bodies with technical or advisory roles in the Company created by provision under the Bylaws must inform the Company of the ownership and the trading of Securities issued by the Company itself, by its parent or controlled companies, in the latter two cases, provided that they are publicly-held companies.

9.1.1. The communication referred to in Section 9.1 above shall cover trading with derivatives or any other securities referenced in the Securities issued by the Company or issued by its parent or controlled companies, in the latter two cases, provided that they are publicly-held companies.

9.1.2. The individuals mentioned in Section 9.1 above shall also indicate the Securities that are owned by a spouse from whom they are not judicially or extrajudicially separated, by a partner, any dependent included in their annual income tax returns and companies directly or indirectly controlled by them.

9.1.3. The communication shall be sent to the Investor Relations Officer, who shall inform the CVM and the Market Entities, according to the model form in **Exhibit C** of this Policy.

9.1.4. The communication to the Investor Relations Officer shall be made: (i) within five (5) days after each deal is closed; (ii) on the first Business Day after the investiture in the office, in this case both for title purposes and for trading in Securities issued by the Company and its parent or controlled companies, provided that it is a publicly-held company; or (iii) within fifteen (15) days from the respective amendment, when the list containing the name and registration number in the National Corporate Taxpayers Register or in the Individual Taxpayers Register of the persons mentioned in Section 9.1.2. above is changed.

10. REPORTING AND DISCLOSURE PROCEDURES ON RELEVANT TRADING

10.1. The Controlling Shareholder, the shareholders who elect members of the Company’s Board of Directors or Fiscal Council, as well as any person or group of individuals or legal entities, acting jointly or representing the same interest, shall inform the Company of any Relevant Trading, including the information in the model form in **Exhibit D** to this Policy.

10.1.1. Communication about the performance of Relevant Trading should be sent to the Investor Relations Officer immediately after the mentioned participations in the definition are reached.

10.2. The Investor Relations Officer shall be responsible for transmitting the information as soon as it is received by the Company, to the CVM and the Market Entities, if applicable, as per section 9 above.

10.3. In cases where the acquisition mentioned in Section 10.1.1 above results in the alteration of, or has been made with the purpose of altering, the composition of the control or the administrative structure of the Company, as well as in cases where said acquisition generates obligation for public offering, pursuant to the applicable regulations, the buyer shall also arrange for the publication of a notice containing the information set forth in **Exhibit D** of this Policy, at least through the same communication channels adopted by the Company, as described herein.



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11. INFRINGEMENTS AND SANCTIONS

- 11.1. Without prejudice to the applicable sanctions under applicable law, to be applied by the appropriate authorities, in the event of breach of the terms and procedures set forth in this Policy, the Board of Directors shall take the disciplinary measures that may be applicable within the Company, including the removal from office or dismissal of the infringer in the event of serious infringement, as provided for by Law No. 6.385 of December 7, 1976, as amended.
- 11.2. If the infringement is committed by third parties, it shall be a breach of contract, and the Company may, without charge, terminate the respective contract and demand the payment of the fine established therein, without prejudice to losses and damages.
- 11.3. If the appropriate measure falls within the legal or statutory jurisdiction of the shareholders' meeting, the Board of Directors shall call it to resolve on the subject.

12. MISCELLANEOUS

- 12.1. The Company shall send, by registered correspondence or email with return receipt requested, to the Controlling Shareholder, officers, members of the Board of Directors and Fiscal Council, when instated, as well as to whom, by virtue of their position, their duties or office in the Company, its controlling shareholders, subsidiaries or affiliates, may become aware of information related to a Material Act or Fact, a copy of this Policy, requesting the return to the Company of the adhesion instrument duly signed in accordance with **Exhibit B** to this Policy, which shall be filed at the Company's headquarters.
 - 12.1.1. On signing the instrument of investiture of new directors of the Company, the signing of the instrument included in **Exhibit B** shall be required, notifying them of this Policy.
 - 12.1.2. Communication of this Policy, as well as the requirement to sign the instrument set out in **Exhibit B** to the persons referred to in Section 12.1 above, shall be made before such persons become aware of a Material Act or Fact, pursuant to Section 6.3 above.
 - 12.1.3. The term set out in **Exhibit B** shall be filed at the Company's headquarters while the persons referred to in Section 12.1 above should be bound to it, and for a minimum of five years after their termination.
 - 12.1.4. The Company shall maintain at its headquarters, at the disposal of the CVM, the list of persons contemplated in Section 12.1 above and their identification, indicating position or role, address and registration number in the National Corporate Taxpayers Register of the Ministry of Finance or the or in the Individual Taxpayers Register of the Ministry of Finance, updating it immediately whenever there is a change.
- 12.2. Any questions about the provisions of this Policy should be addressed to the Investor Relations Officer.

13. DURATION

- 13.1. This Policy is effective from the date of its approval and may only be amended by resolution of the Company's Board of Directors and may be consulted at <https://ri.mitrerealty.com.br>.



EXHIBIT A

1. Signing of an agreement or contract to transfer the Company’s controlling interest, even if under condition precedent or resolute condition.
2. Change of control of the Company, including through the execution of, amendment to or termination of the shareholders’ agreement.
3. Signing, amending or terminating a shareholders’ agreement to which the Company is a party or intervening party, or which has been entered in the Company’s records.
4. Entry or departure of a member who has an operating, financial, technological or administrative contract or collaboration with the Company.
5. Authorization to trade securities issued by the Company in any domestic or foreign market.
6. Decision to arrange for deregistration of the company 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 composition of the Company’s equity.
10. Change of accounting criteria.
11. Debt renegotiation.
12. Approval of stock option plan.
13. Change in the rights and advantages of securities issued by the Company.
14. Stock split or reverse split or bonus award.
15. Acquisition of Company shares to be held in treasury or for cancellation, and sale of shares thus acquired.
16. Company profit or loss and the allocation of cash earnings.
17. Conclusion or termination of the contract, or failure to perform it, when the expectation of execution is public knowledge.
18. Approval, change or withdrawal of project or delay in its implementation.
19. Beginning, resuming or stopping the manufacture or marketing of the product or the rendering of services.
20. Discovery, change, or development of the Company’s technology or resources.
21. Modification of projections disclosed by the Company.
22. Application for court-supervised or out-of-court reorganization, filing for bankruptcy or filing a lawsuit, administrative or arbitration proceeding that may affect the Company’s economic and financial situation.



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EXHIBIT B

ADHESION INSTRUMENT TO THE MATERIAL ACT OR FACT DISCLOSURE POLICY OF MITRE REALTY EMPREENDIMENTOS E PARTICIPAÇÕES S.A.

[INSERT NAME OR TRADE NAME], [INSERT IDENTIFICATION - NATIONALITY, MARITAL STATUS, PROFESSION, RG/RNE, IF AN INDIVIDUAL; IDENTIFY CORPORATE TYPE, IF A LEGAL ENTITY], with address at [INSERT ADDRESS], registered with [CPF/MF - CNPJ/MF] under No. [INSERT NUMBER], as [INDICATE POSITION HELD OR "CONTROLLING SHAREHOLDER"] of **MITRE REALTY EMPREENDIMENTOS E PARTICIPAÇÕES S.A.**, a corporation, headquartered in the City of São Paulo, State of São Paulo, at Alameda Santos, 700, 5º Andar, Jardim Paulista, CEP 01418-002, registered with the National Corporate Taxpayers Register of the Ministry of Economy under No. 07.882.930/0001-65 ("Company"), hereinafter referred to simply as Company, hereby, under this Adhesion Instrument, represents to have learned of the "Material Act or Fact Disclosure Policy of the Company", approved by the Board of Directors on [•] [•], 2019, in accordance with CVM Instruction No. 358, of January 3, 2002, as amended, and make a commitment to observe the rules and procedures provided for in such a document and support its actions in relation to the Company always in accordance with such provisions.

[LOCATION], [•] [•], [•].

Name:

Title:



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EXHIBIT C

**TRADING IN SECURITIES ISSUED BY THE COMPANY AND ITS SUBSIDIARIES AND/OR CONTROLLING SHAREHOLDERS THAT ARE PUBLICLY-HELD COMPANIES
(ARTICLE 11 OF CVM INSTRUCTION 358)**

Period: *[month/year]*

Buyer's or Seller's Name:

Identification:

CNPJ/CPF:

Business Date:

Issuing Company:

Business Type:

Securities Type:

Total Amount:

Quantity by Type and Class:

Balance of position held prior to trading (direct or indirect):

Balance of position held after trading (direct or indirect):

Acquisition / disposal method:

Price:

Broker Used:

Other Relevant Information:



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EXHIBIT D

RELEVANT TRADING

(ARTICLE 12 OF CVM INSTRUCTION 358)

Period: *[month/year]*

Buyer/Seller Name:

Identification:

CNPJ/CPF:

Business Date:

Business Type:

Securities Type:

Purpose of interest:

Target Quantity:

If applicable, statement by the buyer that their purchases are not intended to change the composition of the control or the administrative structure of the Company:

Number of shares and other securities and derivative financial instruments referenced in such shares (number, class and type):

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

Shareholder resident or domiciled abroad:

Name/Trade Name of Authorized Representative/Legal Representative:

CNPJ/CPF:

Other Relevant Information: