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1. Purpose

- 1.1 To establish guidelines for orientating the management practices of Klabin and the relationship with its stakeholders.
- 1.2 To orientate the employees so that engagement practices are adopted in the relationships with the different stakeholders.
- 1.3 To create, maintain and strengthen inclusive, ethical, and mutually beneficial bonds with its stakeholders.

2. Scope

All Klabin's employees, whether direct or indirect as well as other partners must comply with the guidelines in this Policy, the areas which relate to the aforementioned stakeholders being directly responsible for compliance, and the Sustainability Management Unit, for their promotion.

3. General Guidelines

Klabin values the constant, transparent, ethical, and respectful relationship it enjoys with the various audiences with which it relates, its so-called stakeholders. They are:



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Klabin believes that the relationship with its stakeholders is one of the differentiating advantages driving the growth of its businesses. By taking this position, the company seeks to promote positive results throughout its entire sphere of influence, through the adoption of ethical, transparent and respectful conduct in line with its guidelines for socio-environmental promotion and preservation as elements continually part of its dialog.

Hence, Klabin adopts the following guidelines in all interactions and engagement initiatives with its stakeholders:

1. To comply with Klabin's Code of Conduct in order to strengthen the established principles and values;
2. To comply with Klabin's Sustainability Policy in order to strengthen the principles already expressed;
3. To prioritize transparency in its decisions and activities;
4. To provide communication channels that stimulate the exchange of information and opinions, which measure the degree of satisfaction of the various relationships and provide answers to relevant questions with instruments adapted to the different characteristics of each stakeholder group, and a special focus on the local context;
5. To disclose the www.klabin.com.br, website for accessing and downloading financial and sustainability reports, bulletins and journalistic items in addition to corporate information such as descriptions of socio-environmental programs, awards and certifications, manufactured products, among other items;
6. To disclose the Ombudsman's channel for receiving complaints, allegations and suggestions from all internal and external stakeholders that relate with the company;
7. To hold consultations with its leading stakeholders for establishing material themes for guiding Klabin's management and consequently establishing objectives, goals, actions, and indicators;
8. To increase the understanding of the effects of Klabin's decisions and activities with specific stakeholders, seeking to maximize the beneficial impacts as well as minimize the negative ones;
9. To monitor the efficacy of the measures applied in the prevention and control of risks related to the business;

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10. To reconcile conflicts of interest involving Klabin and its stakeholders in the light of the expectations involved in the different contexts and situations;
11. To engage the stakeholders in the commitment to sustainable development, seeking cooperation on socio-environmental issues;
12. To encourage and promote the construction of resolutions with a focus on formats which benefit co-creation originating out of different points of view, based on relations where there are mutual benefits for Klabin and its stakeholder;
13. To offer visiting programs to industrial and forestry units, supplying up-to-date information on the company, the objective being to ensure the propagation of its position as company leader and innovator and one close to the community, focused on sustainability. The level of satisfaction and understanding of the visits should be measured;
14. To respect and support free labor union association and the right of collective bargaining;
15. To adhere to the Guiding Principles on Business and Human Rights, prepared by the United Nations Human Rights Council and the Sustainable Development Goals, established under the UN's Agenda 2030; and
16. To combat sexual exploitation, practices of discrimination, moral and sexual harassment, child and forced labor and to support the practices promoting diversity along the entire value chain.

4. Specific Guidelines

To meet the specific expectations of its stakeholders, Klabin conducts relationship initiatives and has direct communication channels with its principal audiences with which it must maintain permanent contact, create, and strengthen ties and engage as shown below.

4.1 Investors, shareholders, and financial institutions:

- a) Website (www.klabin.com.br/ri) with economic-financial results, notice board to shareholders, events agenda, information on governance, as well as publication of the sustainability report;

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- b) E-mail (invest@klabin.com.br) and (<http://ri.klabin.com.br/static/ptb/fale-ri.asp?idioma=ptb>) link in the website for communication with the investor relations area for accountability, feedback, doubts and negotiations; and
- c) Participation in conferences and in meetings of the Association of Investment Analysts and Professionals of the Capital Markets (Apimec), and holding of the company's road show events.

4.2 Direct and indirect employees:

- a) Provision of exclusive information channels for the employees with current information on Klabin's performance, programs and projects in development, indicators, and goals;
- b) Running of employee satisfaction climate surveys at all Klabin's managerial units for identification of positive aspects and points requiring attention, and creation of action plans for maximizing opportunities for improvement;
- c) Use of performance analysis processes for the development of skills and receiving feedback.

4.3 Clients:

- a) Promotion of periodic events directed at client engagement and enhancing knowledge of Klabin's products, principally when there are changes and/or new products, as well as matters related to the pulp and paper market as a whole;
- b) Transparent disclosure of Klabin's products, prioritizing information which relates to innovation and sustainability, which are the company's main competitive advantages;
- c) Running satisfaction surveys;
- d) Open dialog for identification of possible demands providing the basis for the improvement in practices and products; and
- e) Constant dialog through a dedicated instrument for personalized attendance (Klabin On-Line).

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4.4 Communities and Society:

- a) Constant striving to understand, contextualize and prioritize the impact caused by the operation and transparent efforts and actions for its mitigation and/or compensation;
- b) Respect for the cultures, customs, and values of the local communities;
- c) Commitment to local development through engagement of the community in:
 - Initiatives for income generation or diversification which drives the local economy and reduces the economic dependence of the community on the company;
 - Youth professionalization programs;
 - Environmental awareness and education programs;
 - Socio-educational and cultural programs which are complementary to formal education to contribute to the preservation and formation of local values;
- d) Participation in community events with the aim of reinforcing the personality of the trademark: innovation, tradition, sustainability, leadership, and proximity;
- e) Commitment to the proactive and transparent disclosure of pertinent questions connected to the company's operation and the impact on the local social dynamic;
- f) Running socio-environmental programs with the aim of sharing Klabin's values and disseminating best practices with a focus on education for sustainability;
- g) Promotion of periodic meetings and maintenance of specific tools for dialog and accessible to the communities such as suggestion boxes distributed in public places with telephone for attending the community; and
- h) Management of community suggestions and complaints, guaranteeing their investigation and clear replies to the community.

4.5 Suppliers:

- a) Adoption of socio-environmental criteria for qualification, contracting and retention of suppliers;

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- b) Onsite training for integrating the suppliers with the values and guidelines required by Klabin of its business partners;
- c) Undertaking audits on suppliers deemed to be critical or in cases where there is suspicion of non-compliance in relation to the adoption of socio-environmental criteria, such as the principles contained in the Code of Conduct, the Sustainability Policy, in the Contractual Clauses on Human Rights or in the Social Responsibility Policy – Contracting Suppliers;
- d) Compliance with the legal obligations; and
- e) Provision of a link in the Klabin website (<http://www.klabin.com.br/pt-br/a-klabin/fornecedores/>) for registering new suppliers to be evaluated and screened by the company.

4.6 Government:

- a) Collaboration with respect to current laws, legitimate supply of data and compliance with contractual obligations;
- b) Participation in forums and sectorial committees which defend the interests of the pulp and paper sector as well as in the promotion of the socio-environmental and economic development of the country; and
- c) Involvement in the formulation of public policies which help governments in the fostering and maintenance of social wellbeing.

4.7 Press:

Klabin should maintain a permanent and transparent relationship with the press, contributing to the preservation of the company's interests and image and, at the same time, helping provide information to the other stakeholders.

5. Materiality


Klabin believes that to prioritize its business strategies considering the expectations of its stakeholders is critical to the construction of a long-term, responsible, and harmonious future.

Thus, every two years, or whenever there are significant changes in the company's operations – such as expansion or reduction in operations –, a consultation with stakeholders must be held with the following objectives:

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- a) To establish the relevant themes in the perception of internal and external strategic stakeholders for the chosen locations;
- b) To establish guidelines for decision making and for the sustainability projects executed by Klabin; and
- c) To define sustainability indicators appropriate to the specifics and local reality of each priority stakeholder.

At the end of each cycle, the results and details of this materiality matrix should be disclosed to the stakeholders and other audiences.

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