

	"CA" POLICY		Code KLA-PCA-GIN-0001-EN	
	PCA - SUPPLIER CODE OF CONDUCT		Review 00	Date 10/29/2024

INTRODUCTION

The Supplier Code of Conduct explains the conduct expected of our suppliers, in line with high standards of governance, to establish transparent, ethical relationships and business continuity.

This document is based on Klabin's Code of Conduct and policies, and applicable laws and regulations. It guides socially and environmentally responsible action and the practice of a sustainable economy, always seeking to improve the value chain.

Klabin requires its suppliers to adopt management focused on legality, integrity, and ethics, and encourages them to follow international principles, such as the United Nations (UN) Universal Declaration of Human Rights; the United Nations (UN) Global Compact; and the international labor standards set out by the International Labor Organization (ILO).

We believe that working with our suppliers positively impacts the production chain and generates value for society as a whole, in line with Klabin's Sustainable Development Goals (KSDGs), which seek to strengthen the UN Sustainable Development Goals (SDGs).

Suppliers must practice and monitor the principles contained in this document throughout their supply chain, per current legislation and contractual provisions entered into between the parties.

SCOPE

The Supplier Code of Conduct applies to suppliers and their employees, third parties, and service providers, throughout their production chains, including subcontractors, temporary workers, and any professionals involved, directly or indirectly, in the provision of services or supply to Klabin.

This Code applies to Klabin and to companies in which Klabin holds, directly or indirectly, a 100% stake in Brazil or abroad. This Code must be reproduced in the companies controlled in Brazil or abroad, directly or indirectly, by Klabin, in compliance with applicable laws and regulations, and their respective articles of incorporation. The application of this Code is recommended in other companies, in Brazil or abroad, in which Klabin holds a relevant equity stake.

Any exception to the guidelines set out in this Code must be approved by the Chief Executive Officer with a favorable recommendation from the Head of Legal, Compliance, Risk, Internal Controls, Communications and Institutional Affairs.

ADHESION

A supply or service provision relationship involves adherence to this Code of Conduct according to the Adhesion and Commitment Document available at the end of this material.

GUIDELINES

Klabin is a signatory to the United Nations (UN) Global Compact and, by aligning its operations and strategies with the universal principles of Human Rights, Labor,

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Environment and Anti-Corruption, expects its suppliers to be exemplary in each of these pillars.

1. Human Rights

Klabin recognizes that human rights and fundamental freedoms must be applied to everyone and requires its suppliers to ensure these rights throughout their supply chain, treating their employees with respect and dignity, following the United Nations Guiding Principles on Business and Human Rights.

Klabin expects its suppliers to:

- Respect internationally recognized human rights and combat violations of these rights.
- Not tolerate any form of moral or sexual harassment, sexual assault, prejudice, discrimination, political or religious intolerance, among other abusive practices.
- Offer working conditions that foster diversity, respecting gender, sexual orientation, marital status, religious beliefs, political, partisan, or ideological position, ethnicity, age, origin, social class, or any type of disability or physical characteristics, among others.
- Promote an inclusive, safe, healthy, and fair work environment, with equal opportunities and development for minority groups, such as female people, black people, members of the LGBTQI+ group, people with disabilities, and those aged 50 and over.
- Adopt mechanisms to prevent, mitigate, detect, and remedy potential human rights violations.

Klabin's suppliers: (i) must not tolerate and must combat any illegal labor practice, degrading working conditions, forced or compulsory labor (including, but not limited to, the retention of personal documents, confinement, physical punishment, the threat of violence and withholding of payment), work in conditions analogous to slavery, child labor, sexual exploitation of children and adolescents, human trafficking, among other violations; and (ii) they must not allow exhausting working hours, and any additional hours must be performed within the limits provided for by law.

2. Labor Relations

Klabin expects its suppliers to ensure fundamental rights in labor relations, acting correctly and transparently, investing in the development, safety, and quality of life of its employees, in line with Klabin's Fundamental Rights Policy in Labor Relations.

Klabin expects its suppliers to:

- Fully comply with current labor legislation and any collective bargaining agreements.
- Recognize the freedom of their employees to join unions and representative entities, and the right to collective bargaining.
- Hire professionals of at least 16 years old, except for apprentices, per the corresponding legislation.

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- Restrict unhealthy, dangerous, and night work to those over 18 years of age, in compliance with labor legislation.
- Comply with the provisions of legislation, collective agreements, and collective conventions concerning remuneration, providing a decent standard of living to their employees, and comply with labor, social security, and tax obligations.

3. Health and Safety

Klabin expects suppliers to ensure the physical safety of their employees and all those with whom they interact, strengthening management focused on safe behavior, through a safety education process, in compliance with Klabin's Life Protection Policy.

Klabin expects its suppliers to:

- Promote a safety culture in which all your employees perform their activities safely.
- Not to condone any negligent attitude towards life.
- Comply with the safety standards established by Klabin, as well as the Occupational Health and Safety Management System (OHSMS).
- Ensure health and safety conditions in the workplace by providing training and individual and collective protective equipment.
- Prohibit their employees from using, selling, or carrying firearms, alcoholic beverages, or illicit substances at Klabin's units or when at Klabin's service.
- Ensure that their employees do not remain on Klabin's premises if they are under the influence of substances that alter their behavior.
- Provide the technical conditions necessary for the exercise of the functions of their employees, as well as adequate and healthy working conditions: ergonomics, access to drinking water, electrical installations, cleaning, bathrooms, meals, places for food or food preparation, accommodations for housing when applicable, among others.
- Have the licenses and promote the necessary training and certifications for full compliance with regulatory standards, and keep all documents updated related to the health and safety of their employees.
- Have the structure, material, and human resources necessary to identify and prevent accidents and emergencies.
- Ensure the registration and reporting of work accidents, including traffic accidents, promptly, and immediately report any occurrences related to Klabin.
- Maintain a crisis management plan in their activities and adopt preventive and work continuity measures.
- Ensure that its employees take care of Klabin's facilities, resources, equipment, and materials.

4. Community Relations

Klabin maintains an economic, social, and environmental agenda in the communities it operates in, with guidelines to minimize any impacts linked to its operations, as well as projects and initiatives focused on local development, citizenship, environmental education, and culture.

Klabin expects its suppliers to:

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- Respect the communities with which they relate in the execution of activities by Klabin, including, but not limited to, quality and way of life.
- Value the dynamics of communities in the social, environmental, and economic spheres, in line with the generation of shared value.
- Apply methods to identify, monitor, and mitigate potential impacts they may generate on communities, and it is recommended to carry out periodic human rights assessments in their supply chain.

5. The Environment

Klabin endeavors to maintain a solid, resilient value chain based on good practices throughout the production life cycle; it is committed to sustainable development; it pursues the best Environmental, Social, and Governance (ESG) practices, and its performance and growth strategy focus on economic development, sustainability, environmental protection, and social justice.

All of Klabin's suppliers must comply with applicable environmental laws and regulations and obtain all the environmental permits and permits necessary for their operations, products, and/or services.

Klabin expects its suppliers to:

- Maintain an environmental management system and pursue eco-efficient standards throughout the production process, including the efficient use of natural resources, waste management and preventive measures for any type of pollution associated with their activities.
- Adopt measures to prevent and mitigate damage to biodiversity and act for its conservation.
- Follow a zero-deforestation policy (no conversion of native areas to productive areas or other land use), biodiversity conservation, mitigation, and adaptation to climate change (reduction of greenhouse gas emissions – GHG – and energy consumption).
- Ensure the timely recording and reporting of environmental events and immediately report any occurrences to Klabin.
- Make commitments in favor of sustainable development, including in their supply chain, comply with and demand adherence to all environmental standards applicable to their products and services, such as those established by the National Environmental Policy (Law No. 6,938/81) and the Environmental Crimes Law (Law No. 9,605/98).
- Implement programs to manage the environmental impacts of their activities with reduction or mitigation initiatives.

6. Product Quality and Safety

Klabin is committed to anticipating and satisfying the needs of its customers, exceeding expectations in terms of quality, innovation, and agility.

Klabin expects its suppliers to:

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- Ensure technical and operational conditions to maintain standards of quality, efficiency, and good practices throughout the process of supplying products and/or services to Klabin.
- Make deliveries respecting the conditions established in the contract, including criteria, specifications, and deadlines, and not limited to these.
- Adopt procedures for identifying chemical substances, training their employees, and managing risks at all stages of the process, from transportation to storage and disposal.
- Comply with safety standards throughout the production process.

7. Ethics and Integrity in Relationships

Klabin has a history of business conduct focused on legality and integrity and believes that the construction of sustainable and lasting businesses, ethical and transparent relationships, as well as a fairer society is the main legacy it has built over more than 100 years of existence, generating shared value for all.

7.1. Legal Compliance and Transparency

All of Klabin's suppliers must act in strict compliance with current and applicable laws and comply with the standards, policies, and procedures established throughout the production chain.

Klabin expects its suppliers to:

- Implement instruments to strengthen good practices, consolidate a culture of integrity, and engage their employees in guidelines related to ethics and legality.
- Act in good faith and provide Klabin with true and suitable information, as well as report any ethical deviation or legal non-compliance that may impact Klabin's business relationship or reputation.
- Endeavor to continuously improve their processes and align with good market practices.
- Maintain management reports and accurate accounting and business records.

7.2. Confidentiality and Insider Trading

Klabin expects its suppliers to:

- Ensure the confidentiality of information they have access to about Klabin, such as financial, operations, accounts, statistics, budgets, indicators, commercial, or technical information, among others.

In addition to the obligation of confidentiality, Klabin's suppliers who may have access to Klabin's privileged information must refrain from trading Klabin's securities, in compliance with applicable laws and regulations.

7.3. Privacy and Protection of Personal Data

Klabin expects its suppliers to:

- Respect the right of the holders to the privacy of personal data.

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- Process the personal data to which they have access exclusively for the fulfillment of the purpose agreed between the parties and per the General Data Protection Law (Law No. 13,709/2018).
- Maintain mechanisms that safeguard personal data and limit access to people directly involved in the execution of the activity, avoiding improper processing and leaks.
- Train employees on the topic of Privacy and Personal Data Protection and Information Security.
- Implement defense mechanisms against cyberattacks.
- Immediately report to Klabin any suspected or occurrence of incidents involving improper processing of personal data or information security, as well as potential cyber threats.
- Eliminate, at the end of the business relationship, all confidential or intellectual property information of Klabin to which they had access during the period of supply or provision of services unless otherwise stipulated in the contract.
- Maintain an adequate data governance program, per applicable laws and regulations, and prove, whenever requested by Klabin, that they maintain the program active.
- Promptly assist Klabin and provide the pertinent information in the event of a personal data incident or to verify its occurrence.

7.4. Communications, Trademarks, and Intellectual Property

Klabin expects its suppliers to:

- Preserve all of Klabin's intellectual property rights and have procedures in place to identify potential violations.
- Not use Klabin's name, logo, visual identity, industrial designs, and patents without prior written authorization.
- Not comment on behalf of Klabin in any communications medium, network, or social media channel without prior authorization.
- Not to disclose confidential data and internal or strategic information of Klabin.
- Not make donations, enter sponsorship, make political contributions, or obtain undue advantages on behalf of Klabin.

7.5. Anticorruption

Klabin does not tolerate any act of corruption and has an Anti-Corruption Policy that must be observed by all its suppliers.

All of Klabin's suppliers must comply with all applicable local and international anti-corruption laws and regulations, including, without limitation, Anti-Corruption Law No. 12,846/2013 and Decree No. 11,129/2022. The violations exemplified below can be characterized as corruption or acts harmful to the public administration:

- Giving, paying, promising, or offering bribes, gifts, subsistence allowances, gifts, travel and lodging, meals, entertainment expenses, or events, among others, to public agencies or officials to obtain an undue advantage.

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- Financing, funding, sponsoring, or, in any way, subsidizing the practice of illegal acts.
- Using an intermediary individual or legal entity to practice acts of corruption or fraud to conceal the true interests or identity of the beneficiaries of the acts practiced.
- Frustrating or defrauding any public tender or contract, as well as defrauding any process of obtaining public licenses or authorizations.
- Hindering investigations or inspections by public bodies, entities, or agents.

In this regard, Klablin expects its suppliers to:

- Not tolerate any type of act of corruption, bribery, extortion, kickback, facilitation payment, personal favoritism, fraud, or other forms of illicit or criminal acts in their production chains.
- Not use their influence to obtain advantage for their own benefit, for the organization to which they belong, or for the benefit of third parties, including Klablin.
- Not condone or practice any act of corruption or grant undue advantages, directly or indirectly, in interactions with public bodies and officials or private entities.
- Maintain mechanisms to prevent money laundering and not participate in or facilitate actions that aim to give the appearance of legality to funds from illicit activities, such as drug trafficking, illegal trade, corruption, or corporate fraud.
- Implement practices to prevent and combat corruption in line with the applicable legislation and/or regulations, in particular the Integrity Program required by Federal Decree No. 11,129/2022.

7.6. Competition Defense

All of Klablin's suppliers must comply with local and/or international laws and regulations applicable to the defense of competition and not tolerate acts that violate these rules, in particular Brazil's Competition Law No. 12,529/2011.

In this sense, Klablin expects its suppliers to:

- Not carry out bids in collusion, fix prices or sales conditions, or entering into agreements that favor the formation of cartels.
- Not hinder the access of competitors to the market, not practice predatory prices, or adopt conduct that constitutes abuse of any dominant position, economic or market power (dumping).
- Not practice tie-in selling.
- Have monitoring mechanisms to ensure compliance with the corresponding legislation.

7.7. Conflict of Interest

Klablin expects its suppliers to:

- Formally declare, before starting the negotiation process or before any commercial stage, situations that may constitute a conflict of interest or have the appearance of a conflict of interest, such as family ties or affinity with Klablin's controllers,

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managers, employees, former employees, suppliers or competitors and ties with Public Officials or Politically Exposed Persons (PEP).

- Report any conflict of interest that has arisen after the beginning of the business relationship.

7.8. Gifts & Hospitality

Klabin expects its suppliers to:

- Follow the provisions of Klabin's Code of Conduct and do not offer or receive gifts, invitations, trips and accommodations, meals, among others, from the managers and/or Klabin employees. The exceptions are institutional gifts, with a logo and of no commercial value.
- Not to promise, offer, or receive gifts, invitations, trips, and hospitality, among others, from public agencies or officials to obtain an undue advantage.
- Not to offer or receive, on behalf of Klabin, gifts, invitations, trips, and hospitality, among others, from third parties in exchange for personal favors or in favor of a third party, to influence decisions.

8. Monitoring and Evaluation

Klabin is committed to continuous improvement and periodic monitoring of processes, which are fundamental foundations for identifying the main risks, evaluating the effectiveness of the controls applied, detecting deviations, and implementing the necessary corrections.

Klabin expects its suppliers to:

- Ensure that the conduct of their employees is aligned with the guidelines in this document throughout the supply chain.
- Assist Klabin's teams with diligence and periodic monitoring, including in loco, provide the requested supporting documentation, and commit to implementing any action plans resulting from this monitoring.
- Provide their employees with a mechanism for receiving and dealing with complaints of ethical deviations, as well as complaints about administrative and operational issues.
- Ensure anonymity and non-retaliation to the whistleblower in good faith.
- Have a confidential and impartial process for investigating complaints, as well as implementing subsequent actions and reporting the results to Klabin when requested.

9. Consequence Management

In the event of non-compliance with the applicable legislation or regulation, the guidelines of this Code, Klabin's policies, or contractual provisions, Klabin will adopt appropriate measures, including educational actions to guide the improvement of its suppliers' procedures and controls, suspension or termination of the business relationship, and/or legal measures.

Ethics are the basis of Klabin's performance and our suppliers are selected taking into account their relationship history with Klabin and restrictive indications in publicly

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accessible databases, such as CEIS – Registry of Disreputable and Suspended Companies (Federal Court of Accounts) available at <https://portaldatransparencia.gov.br/sancoes/ceis>; CEPIM – Registry of Impeded Private Non-Profit Entities (Federal Court of Accounts) available at <https://portaldatransparencia.gov.br/sancoes/cepim>; Register of Employers who have subjected workers to conditions analogous to slavery (Ministry of Labor and Employment) available at <https://www.gov.br/trabalho-e-emprego>. Klabin reserves the right not to select suppliers that are in a critical situation of default in the market, as indicated by risk agencies such as Serasa Experian, S&P Global Ratings, among others.

Suspected violations can be reported to Klabin's Integrity Channel and Ombudsman, available 24 hours a day, 7 days a week.

Integrity Channel and Ombudsman

www.canalintegridadeeouvidoria.com.br/klabin

0800 718 7814 – Brazil

0800 222 0545 – Argentina

Reports can be filed anonymously or with identification. Confidentiality is guaranteed, as is non-retaliation against whistleblowers in good faith.

10. Multiplier Effect

Klabin believes that to expand the reach and multiplier effect of its culture focused on legality and integrity, suppliers must disseminate and consolidate the guidelines in this Code in their supply chain. In addition, Klabin encourages them to structure their own code of conduct, collaborating with the generation of shared value for society. To this end, Klabin will also make efforts to promote educational actions and initiatives to foster the development of its suppliers.

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Adhesion and Commitment Terms

I declare that I have received Klabin's Supplier Code of Conduct and undertake to fully comply with the rules and principles set forth therein and to multiply the content for my employees, throughout the production chain, including subcontractors, temporary workers, or any professionals directly or indirectly involved in the provision of services or supply to Klabin. I assume the responsibility and commitment to report to Klabin, immediately, any potential violations of this Code.

Corporate Name: _____
Tax number: _____
Name of authorized signatory: _____
Authorized Signer's Position: _____
Location: _____
Date: _____
Signature: _____

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