

# ANTI-CORRUPTION MANUAL



Klabin

## THE CODE OF CONDUCT OF KLABIN MENTIONS THE FOLLOWING VALUES:

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## INTRODUCTION

To underline the concepts laid out in its Code of Conduct and reaffirm its commitment to sound business practices, Klabin has implemented the Program to Combat Corruption, whose tools include this Manual.

In this regard, and in line with Federal Law 12,864, also known as Brazil's Anti-Corruption Law, which came into force on January 29, 2014, this Manual has been designed to clarify which practices should be completely avoided in the corporate environment, in society, and in direct and/or indirect relations with Brazilian and foreign public and private entities.

This Manual is intended for top management, employees, suppliers, customers and associates and subsidiaries, both in Brazil and abroad.



## HISTORY

On January 29, 2014, Federal Law 12,846, also known as the Anti-Corruption Law, was enacted, which establishes punishment for acts of corruption against Brazilian and foreign public administrations.

This law is the result of international commitments undertaken by Brazil, particularly at the convention of the Organization for Economic Cooperation and Development (OECD), and the United Nations Convention against Corruption (UNCAC).

This guide was prepared to further strengthen Klabin's understanding of good conduct practices and compliance with the Anti-Corruption Law.



## THE CODE OF CONDUCT OF KLABIN MENTIONS THE FOLLOWING VALUES:

"Since its establishment in 1899, Klabin has always pursued development in order to provide its employees, customers, suppliers and society in general with a relationship that is sustained by ethical conduct and socially recognized principles.

The high standards followed by Klabin, both in the past and the present, are fundamental to our growth.

The Code of Conduct already establishes that "Klabin discourages granting any advantage or privilege to public agents, is careful to comply with policies, norms and prevention controls and is against money laundering and illicit acts of any kind in strict compliance with the applicable laws and in conformity with the best national and international practices."



## WHY AN ANTI-CORRUPTION MANUAL WHEN THERE IS ALREADY A CODE OF CONDUCT?

To further bolster the concepts laid out in the Code of Conduct, this Manual was prepared to detail the anti-corruption procedures implemented by Klabin and to help understand which acts could be associated with corruption practices or acts that are harmful to Brazilian or foreign public administrations.

This Manual is intended for all those who are directly or indirectly related to Klabin, as shareholders, managers, employees or service providers. It

is the responsibility of everyone, without exceptions, to become familiar with and apply the concepts and the law in force, in any country where Klabin has subsidiaries, offices or does business.

Este Manual se destina a todos que direta ou indiretamente estão ligados à Klabin, quer sejam como acionistas, dirigentes, colaboradores ou prestadores de serviço. É responsabilidade de todos, sem exceção, conhecer e aplicar os conceitos e a legislação em vigor, em qualquer País nos quais a Klabin possua subsidiárias, escritórios ou faça negócios.

## CONCEPTS AND CLARIFICATIONS



### WHAT IS CORRUPTION?

It is the act of paying, promising to give or offering something to someone or using influence to obtain any benefit for oneself or for an organization to which the person belongs, even if the offer was not accepted. The most widely known form of corruption is bribery, although it may also take the form of gifts, travels, entertainment, etc.

This Manual specifically deals with corruption or harmful acts involving public agencies, but the concept is applicable to corruption involving any entity - public or private.

The distinction is because of the law enacted, which specifically refers to public agencies and officials, Brazilian or foreign.

## PRACTICES THAT COULD BE CHARACTERIZED AS CORRUPTION

The following are examples of acts, directed at government entities, labor unions, political parties, public servants, Brazilian or foreign government agencies, including spouses, children of employees and other relatives by consanguinity or kinship.

- Giving, promising or offering bribery;
- Giving, promising or offering gifts, payment of expenses and souvenirs, except institutional souvenirs such as notebooks, calendars, etc.;
- Paying, promising or offering to pay for travel and accommodation;
- Paying, promising or offering meals whose values exceed the limit established in the Internal Policies of Klabin;
- Paying, promising or offering to pay entertainment expenses, such as sports events and concerts.

## DOES CORRUPTION COVER OTHER ACTIONS?

If you are in doubt, consult the Klabin Ombudsman before taking any decision or action that, even if not listed above, could be considered an act of corruption.

Note that the direct or indirect employees of Klabin are not authorized to adopt any procedure that is contrary to those set forth in the Code of

Conduct and/or the Anti-Corruption Manual, i.e. no action, regardless of the position held, that could harm the image of Klabin regarding ethical conduct will be tolerated. Also note that everyone is responsible for helping to disseminate these rules and concepts.

## HARMFUL ACTS

In addition to acts of corruption, the law deals with other aspects considered harmful to Brazilian or foreign public administrations, which include:

- Demonstrably financing, defraying, sponsoring, or somehow subsidizing the practice of unlawful acts envisaged in this Law;
- Demonstrably using a natural or legal person as intermediary to conceal or disguise one's real interests or the identity of beneficiaries of such acts;
- a) Thwarting or defrauding, through adjustments, agreements or any other means, the competitive nature of a public bidding process;
- b) Impeding, disturbing or defrauding any act in a public bidding process;
- c) Removing or trying to remove a bidder through fraudulent means or by offering benefits of any type;
- d) Defrauding a public bidding process or the resulting contract;
- e) Creating, in a fraudulent or irregular manner, a legal entity

to participate in a public bidding process or entering into an administrative contract;

- f) Obtaining undue advantage or benefit through fraud, alterations or extensions of agreements entered into with public authorities, without authorization from law, during the call for public bidding process or in the respective agreements;
- g) Manipulating or committing fraud against the economic and financial balance of the agreements entered into with public authorities;
- Hampering investigations or inspection by public agencies, entities or agents, or interfering in their activities, including within the scope of regulatory agencies and inspection authorities of Brazil's financial system.

## WHAT ARE THE CATEGORIES OF PUBLIC EMPLOYEES?

- Employees of state-owned companies, such as the Central Bank of Brazil, the Federal Revenue Service, the Social Security Institute (INSS), consulates, notary publics;
- State and federal representatives, councilmen, political candidates, employees of the legislative, judiciary and executive branches;
- Military and police personnel;

- Employees of inspection agencies, such as IBAMA, ANATEL, including foreign agencies;
- Service providers working for public agencies.

### DO DONATIONS QUALIFY AS CORRUPTION?

Donations may be qualified as acts of corruption. Certain rules must be observed. However, when in doubt, consult the Ombudsman to help you in taking the right decision. Following are a few criteria to help you better understand these cases:

- Avoid cash donations;
- Donations to public institutions, such as hospitals, the fire department, military police and schools will only be authorized after due analyses and approval by the Board of Executive Officers, and must comply with the internal rules of Klabin;
- Donations that do not serve the interests of communities where Klabin operates should not be authorized and under no circumstance can donations be made to individuals;
- Donations to political parties must comply with the law and Klabin's guidelines.

### WHAT TO DO IN CASE OF ENTICEMENT?

If I am induced to give bribe or any other event, as envisaged in this Manual, in order to speed up the release of documents or processes in any public organization, which would benefit the company, how should I act?

No person, whether directly or indirectly connected to Klabin, whether shareholder, employee or service provider, should negotiate, consent to or create expectations in the other party, but must contact the Ombudsman and their immediate superior.



### WHAT IS THE PUNISHMENT FOR CASES OF CORRUPTION?

#### a) For direct and indirect employees

The employee's work agreement will be terminated and, depending on the seriousness of the act, he will face legal action.

In case of service providers, the agreement will be terminated and the provider will face legal action, if the act was related to Klabin.

#### b) For the company

Following are a few of the items envisaged in law:

- The law stipulates a fine ranging from zero point one percent (0.1%) to twenty percent (20%) of the gross revenue of the fiscal year prior to

the filing of the administrative proceeding, excluding taxes, which shall never be lower than the benefit calculated, when such calculation is possible;

- If the criterion of gross revenue of the legal entity cannot be used, the fine will range from six thousand reais (R\$6,000.00) to sixty million reais (R\$60,000,000.00);
- Announcement of the decision in a mass communication channel.

#### WHAT ACTIONS ARE TAKEN BY THE COMPANY TO AVOID ANY ACT THAT COULD BE CONSTRUED AS CORRUPTION?



- Klabin distributes to all its direct and indirect employees, this Anti-Corruption Manual and the Code of Conduct, so that they may learn and apply the values upheld and practiced by the company;
- Klabin provides a channel for direct communication, through the Ombudsman, to clarify doubts, receive reports of breach and suggestions;
- In addition to its daily routine, the Internal Audit has the additional mission of monitoring and overseeing compliance with the Anti-Corruption Manual and, if necessary, extending such inspection to cover third parties;
- All the agreements entered into between Klabin and any other company for contracting services, purchasing equipment or any other

product, should include a clause against corruption and harmful acts against Brazilian and foreign public administrations;

- Klabin does not accept expenses from employees or third parties that could be considered acts of corruption;
- Klabin will not record documents related to expenses that could be considered acts of corruption;
- Klabin does not accept documents of any nature other than those of expenses incurred and related exclusively to work;
- Klabin does not authorize expenses or events involving government employees, other than those deemed usual;
- Klabin adopts ethical criteria while selecting its suppliers, which includes verification of the credit standing of companies.



### WHISTLEBLOWING AND COMPLAINTS

If you suspect or witness any practice that violates the guidelines of this Manual, do report it to the Ombudsman. You can either access the website [klabin.com.br/ouvidoria](http://klabin.com.br/ouvidoria) or call the toll free number 0800 718 7814.

These channels guarantee the confidentiality of your contact.

### APPROVAL AND VALIDITY

This Manual was revised and approved by the Board of Directors in a meeting held on June 5, 2014 and comes into effect immediately. All other rules and regulations issued by the Company also remain valid.

### LETTER OF COMMITMENT

I hereby declare that I have received a copy of the Klabin Anti-Corruption Manual and undertake to comply with and strive for full and permanent compliance with the guidelines and moral principles that guide our internal and external relations.

Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Department: \_\_\_\_\_

Place: \_\_\_\_\_

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Signature: \_\_\_\_\_





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