



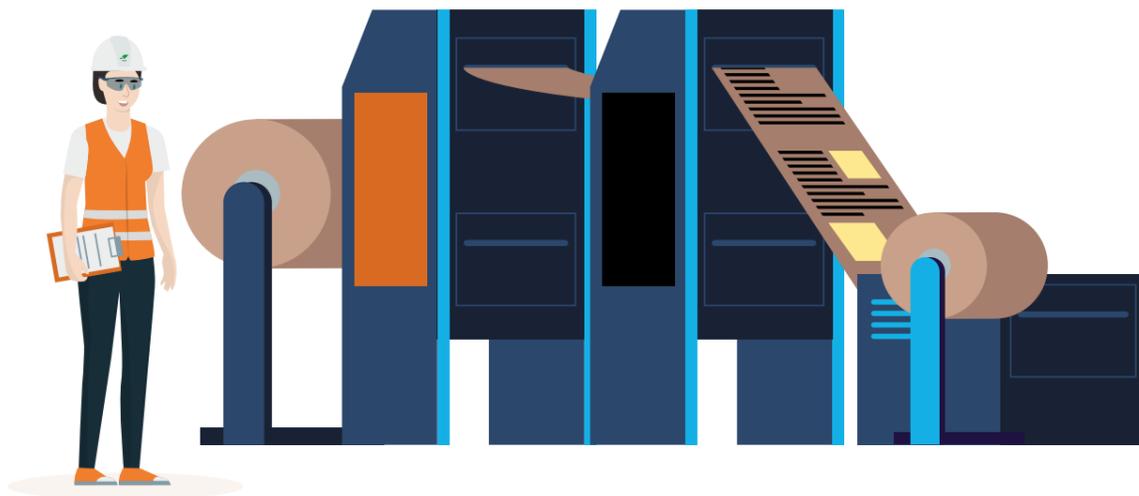
# CODE OF CONDUCT



# SUMMARY

## 1. WHAT GUIDES US

**Page 6** Klabin Attitude, Klabin Agenda of Sustainable Development and public corporate commitments are the sources of inspiration on which our relations are based.



## 2. INTEGRITY AND OUR STAKEHOLDERS

**Page 8** In our interactions, we never forgo showing respect, complying with the legislation, repudiating illicit acts and combating corruption.



## 6. GOVERNANCE

**Page 23** The management of the Code of Conduct is the responsibility of the Integrity area. However, we are all responsible for applying and defending the principles and practices enshrined herein.

## 3. OUR CONDUCT IN THE DAILY ROUTINE

**Page 12** In our activity, some themes are very important for us: sustainable development, human rights, eradication of discrimination and respect for life.



## 4. MANAGEMENT OF CONFLICTS

**Page 20** If in doubt, reflect whether the conduct is in accordance with the law, with the principles and values of the Company and your own.



## 5. MANAGEMENT OF CONSEQUENCES

**Page 22** Failure to comply with the guidelines of this Code may be considered a violation, principally when it results in undue personal advantage, to third parties or incurs losses for Klabin.



## 7. COMPLAINTS CHANNEL

**Page 23** Whenever any violation of Klabin's Code of Conduct is witnessed or suspected, you should report a complaint. Our Complaints Channel is available to all, confidentiality guaranteed.



# MESSAGE FROM THE MANAGEMENT

**AT KLABIN, EACH EMPLOYEE CARRIES WITH THEM A PART OF THE COMPANY'S TRACK RECORD, VALUES, LEARNING AND ACHIEVEMENTS.**

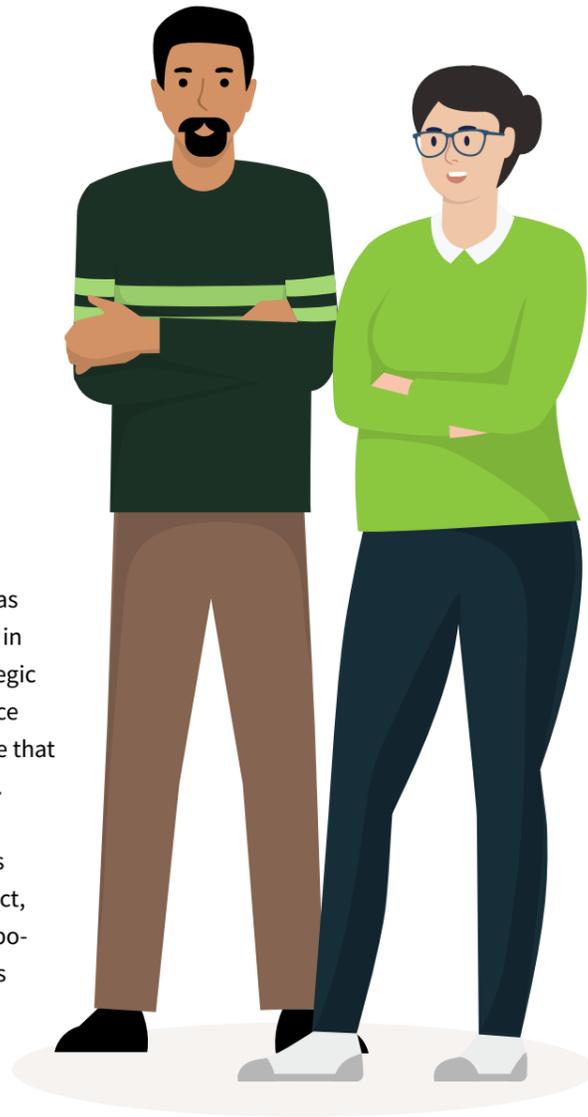
We are a component part of the history of growth and economic and sustainable development of Brazil. In our Company's centenarian trajectory, there have always been challenging moments. However, it gives us great satisfaction to say that we always knew how to overcome them, respecting our ethical essence and our way of being. And if we are today an inclusive, potent, and transformational Company, it is because we were always bound by the best principles, reflected first and foremost in our day-to-day conduct.

We are all jointly responsible for the construction and the maintenance of ethical, fair, and integral relationships. The organization's reputation and integration as well as the sustainability of the businesses depend on this and are committed

ments which we do not accept as negotiable. They are expressed in our policies, integrate our strategic agenda, and are put into practice every day at our units by people that are a part of the team at Klabin.

Our commitment to continuous improvement, to correct conduct, to the strengthening of our corporate governance and to rigorous compliance with the laws and regulations is recorded in the following pages. Besides this, we hope readers of this document will find herein a faithful reflection of our enthusiasm and recognition of excellence.

We believe the journey of ethics is a pact, a continuous process of improvement in our practices, a path along which there is no turning back.



**A document compiled with many hands, Klabin's Code of Conduct reflects our nature and our essence.**

*Statutory Board and Board of Directors of Klabin*



## TO WHOM THIS IS INTENDED

The guidelines of this Code apply to all directors, fiscal councilors, officers, and employees at Klabin and its affiliates and wholly-owned subsidiaries. It is also intended for suppliers, clients, shareholders, service providers, competitors, commercial representatives, government entities and organs, financial institutions, the press, communities, and other audiences enjoying some form of relationship with the Company.

**It is the responsibility of all recipients of this Code of Conduct to be aware and apply the guidelines presented herein in full, strengthening the principles and values of the Company.**

**FAILURE TO COMPLY WITH THE GUIDELINES DESCRIBED IN THIS CODE IS SUBJECT TO THE IMPOSITION OF LEGAL AND DISCIPLINARY SANCTIONS.**



# WHAT GUIDES US

We have as a principle ethical conduct and respect for people, the environment and compliance with the law, thus strengthening values such as justice, equality, transparency, liberty, and dignity. The ethical principles form the basis to the negotiation of contracts, agreements, proposals for alteration of the corporate bylaws and policies which guide our activity.

We base our relations with employees, shareholders, suppliers, clients, competitors, government entities and organs, the biodiversity, and communities, among others, on best practices, on public corporate commitments – as well as the United Nations Guiding Principles on Business and Human Rights (UNGP) – and a set of guidelines expressed in the following sources of inspiration:

## OUR ASPIRATION

To be a Company which is an international bellwether in responsible and innovative solutions attending the constant transformations of society with multiple use, renewable, recyclable, and biodegradable forestry-based products.

With the purpose of contributing to the construction of a sustainable economy and inspiring the choices of the end consumer, we have made the prosperity of the planet our priority, generating value for our investors, senior managers, employees, business partners and society.



## KLABIN ATTITUDE

**A SET OF CAPABILITIES COMBINING BEHAVIOR AND ATTITUDES DEEMED ESSENTIAL FOR THE COMPANY, AIMED AT ENGAGING PEOPLE, DELIVERING RESULTS, AND BUILDING THE FUTURE, THUS ENSURING THE PRESERVATION OF THE ETHICAL PRINCIPLES AND VALUES WHICH KLABIN DEFENDS.**

## KLABIN'S SUSTAINABLE DEVELOPMENT GOALS (KODS)

We have our own Sustainability agenda, which organizes and guides the Company's priority Environmental, Social and Governance (ESG) benchmarks, establishing short-, medium- and long-term initiatives, in the context of the Sustainable Development Goals (SDGs) as defined by the United Nations Organization (UNO).

One of the goals of this agenda is Ethical Conduct, which also permeates all other items, and whose value proposal is: "Rectitude and transparency

in the Company's relationships, protecting fundamental freedoms and in conformity with the domestic legislation and international agreements."



## COMPLIANCE WITH THE LEGISLATION

Compliance with the law is one of Klabin's principles. For this reason, it is critical that our directors, officers, partners, employees and third parties act so as to adhere to the Company's guidelines, seeking to comply with good national and international practices. In this context, we vigorously repudiate conduct and doctrines which promote terrorism, money laundering, crimes

against the tax system, crimes against the government or any other illicit act.

The guidelines contained in this Code of Conduct are grounded in ethical principles and the Federal Constitution or applicable Law in the other countries in which the Company operates and especially those applicable to the following themes:

- Anti-corruption
- Federal Constitution
- Money Laundering
- Anti-Trust Laws
- Penal Code
- Consolidation of the Labor Laws
- Statute of the Child and the Adolescent
- Data Protection
- Environment

# INTEGRITY AND OUR STAKEHOLDERS

All our interactions, internal and external, are based on ethical and legal principles. The following topics provide guidance on the conduct which we must adopt in our relationships with the different stakeholders.



## EMPLOYEES

Our commitment is to maintain a respectful, inclusive, and motivating organizational climate in our operations. In this context, we have a structured set of programs, initiatives, and internal rules for the development of employees, promotion of quality of life and diversity and preservation of health, life, and the physical integrity of people in the exercising of their professional activities.

We comply with the current legislation, contracts, agreements, and collective bargaining conventions, also including the guarantee of freedom of association. We endeavor to maintain an agenda of open and constant dialog with entities representing the professions that goes beyond collective bargaining and changes to the legislation.

We expect our employees to exercise their activities with diligence, commitment, respect for all people, strictly observing the guidelines of this Code and other policies of the Company.

We consider technical preparedness, professional experience, the ability to work in a team and alignment with the organizational culture as fair criteria for admission and promotion of employees. We will not tolerate

any type of prejudice or discrimination as shown in more detail below under the heading **Labor Relations**.

Our employees may not contract or exercise influence in the engagement of family members whatever their degree of kinship, whether related by blood such as parents, siblings, brothers/sisters, uncles/aunts, cousins, and nephews/nieces, or by affinity, such as spouses, parents-in-law, daughters-/sons-in-law and

brothers-/sisters-in-law, to work in direct or indirect subordination within the same hierarchical line. In the same way, there should be no kind of influence in hiring, including any exchange of benefits or advantages.

We shall not permit Klabin's name to be used for obtaining self-benefits or benefits in favor of other employees, third parties and/or family members or additionally, activities that cause harm to the Company.

## SHAREHOLDERS

We operate in order to deliver an adequate return to our shareholders and investors both in terms of dividends as well as the valorization of the shares, maintaining our commitment with ethics and sustainable development.

Our relationship with shareholders, investors and market analysts is guided by the rules of Corporate Governance according to the definitions itemized under the heading, **Trading in Klabin's Shares**.

For this purpose, we adopt a style of communication which is objective and transparent and executed by specially designated employees, respecting the access to material information, in a timely manner.

## CLIENTS

We have as a permanent commitment to anticipate and satisfy the needs of our clients, exceeding expectations in terms of confidentiality of information, quality, innovation, and agility.

The relationship with our clients should be guided by the current legislation in the countries where we operate, by best commercial practices and by an ethical and respectful attitude. Information as to deadlines, conditions, and specifications of Klabin's products and services must be provided clearly and with agility

in order to eliminate any doubts that may frustrate client expectations.

We reserve the right to reject or terminate any commercial relationship should it represent a legal, social, environmental, or reputational risk due to situations which are contrary to the Company's guidelines on integrity.

It is forbidden to receive or offer any monetary amount, goods or service to clients or their intermediaries with the purpose of favoring or wrongfully executing a commercial relationship

even when this may represent loss of business opportunities. We also do not allow the offering or receiving of gifts with the exception of those of an institutional nature (see more under the heading **Gifts, presents, invitations, travel, and courtesies**).

We operate in accordance with the customs legislation, complying with the regulations related to foreign trade processes. We adhere to all importing and exporting restrictions imposed by the countries where we operate and with which we have commercial relations.

## SECTOR ASSOCIATIONS AND COMPETITORS

Our relations with competitors are based on the principle of free competition, on the prevailing legislation and on best commercial practices.

All information on the market, products and competitors must be raised through legal and/or public means.

**In this context, the realization of agreements with competitors to determine or collude on market selling prices, the sharing of markets or territories are not permitted. We will also not tolerate any attitude which harms the image of sector associations and/or competitors.**



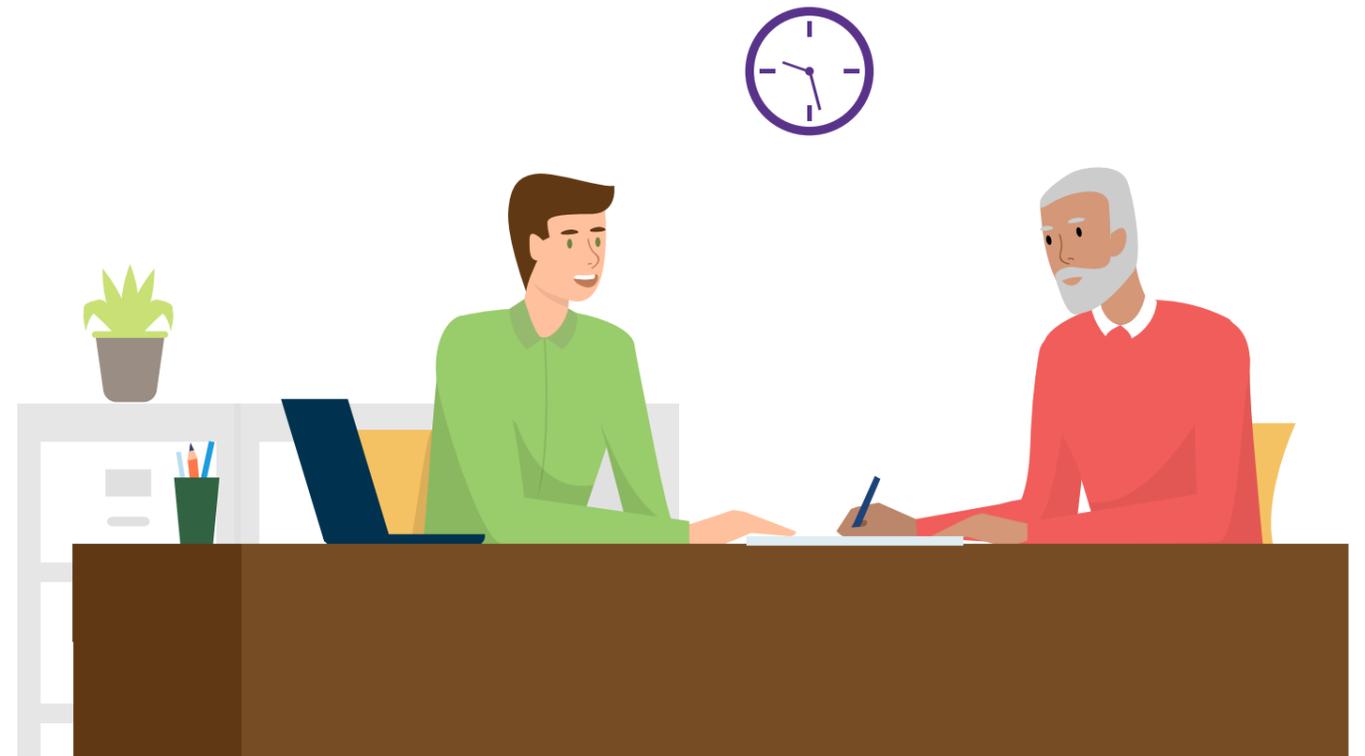
## SUPPLIERS AND SERVICE PROVIDERS

We consider it fundamental to our success to select our partners using fair competitive methods, based on technical factors of cost and quality. With acquisition of goods and services, compliance with all laws and Klabin's ethical, anti-corruption and sustainability guidelines

is obligatory so that these aspects are contemplated along the value chain (see **Child Labor and/or Labor Analogous to Slavery**).

All contracting for the acquisition of goods or services is subject to a reputational evaluation.

**We do not allow our senior managers, employees, and representatives to receive from a supplier/service provider or potential supplier/potential service provider presents, payments, donations, gratifications, leisure options, sponsorships or proposal of any other advantage or illicit benefit.**



## GOVERNMENT AND REGULATORY ORGANS AND ENTITIES

The granting of advantages, privileges, payments in the form of gratifications, presents and courtesies to government and private agents in exchange for any improper benefits for Klabin is not permitted.

We adhere to the internal protocols for attending regulatory organs in order to guarantee compliance with legal procedures and to ensure that information rendered is precise and sufficient.

Klabin's relationship with government is conducted exclusively by authorized employees with powers designated by senior management or due to the responsibilities of the position. All employees involved directly or indirectly with government and regulatory entities most comply with Klabin's Anti-Corruption and Relationship with Government Entities' guidelines.

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**WE ENSURE COMPLIANCE WITH THE LAWS AND ESTABLISHED POLICIES, RULES AND CONTROLS TO PREVENT AND COMBAT MONEY LAUNDERING AND ILLICIT ACTS OF ANY KIND.**

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# OUR DAILY CONDUCT

## SUSTAINABLE DEVELOPMENT



**“SUSTAINABLE DEVELOPMENT IS DEVELOPMENT TO MEET THE NEEDS OF THE PRESENT WITHOUT COMPROMISING THE CAPACITY OF FUTURE GENERATIONS TO MEET THEIR OWN NEEDS.”**  
(BRUNDTLAND REPORT, 1987)

**Our commitment to sustainable development means that we consider best Environmental, Social and Governance (ESG) practices in all our decisions, establishing values which we must deliver to society.**

In practice, this is reflected in our operations and growth strategy with a focus on economic development, environmental sustainability, and social justice. In this context we consider the dimensions of sustainability in an all-encompassing form: leadership and governance, environment (considering the evaluation of risks and the positive and negative impacts both of and also

in the operations of the Company), human capital, social capital (which includes aspects of human rights, fundamental in all our relations), business model and innovation.

We expect the adoption of similar commitments by our business partners and suppliers to promote sustainable development along the value chain.

## ANTI-CORRUPTION

**Our commitment to ethical conduct in relations with our stakeholders is not negotiable.**

We do not condone or practice any act of corruption or grant improper advantages in interactions with government or private entities. Our employees are instructed and receive training in anti-corruption conduct, thus stimulating and promoting an integral business environment.

It is the responsibility of all – shareholders, senior managers, employees, and service providers – to apply, and be aware of the concepts described in our internal guidelines as well as the legislation in force in any country in which Klabin has subsidiaries, offices or does business.

For any acquisition of goods and services, compliance with anti-corruption laws and guidelines by our partners is obligatory (see **Labor Relations**).

Before any decision or action can be construed as acts of any form of corruption involving the Company’s activities and those of the controlled companies in Brazil and abroad, guidance should be sought from management and the Integrity and Legal areas. In the event of suspicion or if incidents have been identified, then this should be reported to Klabin’s Complaints Channel.

## THE PRESS, ADVERTISING MARKET AND SOCIAL MEDIA

All information disclosed to the press must be both precise and transparent in accordance with the principles grounded in truth and respect for press freedom and should comply with the prevailing legislation.

Contacts with the press must be made only by the Company’s specially designated employees in such a way as to maintain a relationship of trust with the media and the image which it is desired to project with public opinion. No employee may make contact with the press or give interviews in the name of Klabin without authorization.

Every employee who is approached by a representative of the press soliciting information on Klabin should contact the Communications area,

which will then assess the approach and align the messages to be published. This guidance should also apply to those employees already designated for contact with the press.

The relationship with the press as well as with the advertising market should be strictly professional and without payments or favors in exchange for information or benefits.

We expect the posture of our employees in the social media to respect the values and guidelines expressed in this Code of Conduct. We shall not allow disclosure of any content (corporate images, videos, data, and information), the property of Klabin and still not published, or in the form of confidential infor-

mation or technical and financial data on clients or businesses.

We also do not authorize the capture or transmission of photographs or videos taken inside our installations. For more information or questions, please see internal guidelines on the conduct to be adopted in the social media.

We repudiate any infringement of copyright and the storage or sharing of pirated content, pornography, pedophilia, material of a discriminatory nature or expressing prejudiced views, or any other illicit matter. Should eventual occurrences arise, we shall always collaborate with the authorities and when justified, impose the corresponding disciplinary sanctions.

## COMPETITIVE PRACTICES

We believe in free competition and will not tolerate acts and practices which can be deemed as contrary to the anti-trust legislation. To ensure compliance with this commitment, we have implemented practices and conduct to be followed in the Company such as training and managerial guidance.

## LABOR RELATIONS

### CHILD LABOR AND/OR LABOR ANALOGOUS TO SLAVERY

We have no relationships with and do not tolerate the hiring of suppliers and service providers or association with companies or entities that may have any kind of connection with the exploitation of child labor and/or labor analogous to slavery, even when a component of the Company's value chain.

We repudiate labor practices which are incompatible with human dignity and with the basic rights of the worker\*. We are committed to ensuring that our suppliers and service providers comply with the guidelines of conduct contained in this Code, in particular those related to child labor and/or labor analogous to slavery.

The engagement of young apprentices will only be permitted pursuant to the terms of the law and as long as this does not compromise their formation and educational development.

### PREJUDICE AND DISCRIMINATION

At Klabin, we value and cultivate an environment of respect for dignity, diversity and for human rights. We adopt practices which contribute actively to the prevention, combat and eradication of discrimination, harassment, disrespect, exploitation, and prejudice of any kind, be it based on race, gender, skin color, religion, age group, sex, political convictions, nationality, marital status, sexual preferences, social status, labor union participation, political allegiances, or disability, among others. Among such practices are training, affinity groups and campaigns.

We provide working conditions that allow all employees, without distinction to exercise their activities, to grow and be recognized for good professional performance.

### HARASSMENT AND ABUSE OF AUTHORITY

We do not tolerate sexual or moral harassment, abuse of authority or any behavior of a similar nature which translates into disrespect, intimidation, humiliation, or threats. This guideline should be followed by all those connected directly or indirectly to the Company, irrespective of their position in the hierarchy.

We recommend that any person believing they have been the target of discrimination, humiliation or prejudice and abusive practices or in a situation of disrespect at Klabin, should communicate the fact immediately to their immediate superior or to the People & Management area of their unit or also report the matter to the Complaints Channel.

We reserve the right of contractual rescission in cases of proven violence against women, including violence committed outside the confines of the Company.

In case of proven abuse or harassment be it of a sexual or moral nature, appropriate disciplinary measures shall be taken.

\*Since 2003, we assumed a public commitment with fundamental values related to human rights on becoming signatories to the Global Compact.

## OCCUPATIONAL SAFETY

We do not tolerate any attitude of negligence in relation to life. Our Occupational Health and Safety Management System (SGSSO) covers all operations, permanent and temporary employees as well as service providers and visitors. The Company's results only have meaning when all perform their activities in a safe manner.

We seek high levels of excellence for the operational process with a view to valorizing life and the protagonism of all employees in the construction of a safe environment.

Our philosophy – “Valorize life: a caring gesture” – reinforces in-house initiatives of a generative culture in which all have the re-

sponsibility of caring for themselves, for others and not allowing themselves to be cared for.

The target of our operations is to seek continuous improvement and to upgrade safety in processes and for people through a permanent process of auditing based on the commitments of Occupational Safety and Health.

## ALCOHOL, NARCOTICS AND BEARING OF ARMS

The bearing and use of firearms are not permitted.

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The imbibing of alcoholic beverages, except in the case of festive events authorized by the Company's Statutory Board and the use, sale and carrying of narcotics are forbidden in the confines of Klabin as well as the exercising of professional duties when in a state altered by the use of such substances.

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## POLITICAL ACTIVITIES

We do not oppose the candidacy of our employees to public office. However, prior notification of this intention must be made in the period which precedes the election to the employee's manager or to the local People & Management area.

**Electoral campaigning on the premises of Klabin is not permitted as well as making use of the position or using the name of the Company for political promotion.**

The hiring of politically exposed people is subject to prior evaluation by the People & Corporate Services and Legal, Integrity, Risk Management & Internal divisions, taking into account the Company's internal requirements for contracting.

# EQUITY PROTECTION

Our equity comprises the Klabin brand name as well as resources with which we run our businesses. Incorporating Klabin's equity are:

**MATERIAL ASSET VALUES:** buildings, equipment, and inventory, among others.

**INTELLECTUAL PROPERTY AND INTANGIBLE VALUES:** confidential information, business plans and strategic data registered in informatized systems or in any types of electronic media, pertaining to Klabin and to our clients, suppliers, and service providers (see Intellectual Property below).

All property and equipment that we provide to our employees are for professional use in accordance with Klabin's internal guidelines and policies. The inappropriate or illegal use of the Company's resources or, furthermore, for personal benefit or that of third parties, is prohibited.

It is obligatory on the part of employees to take care of the equipment entrusted to them by Klabin.

It is the user's responsibility to avoid submitting equipment to risky or reckless use which may result in physical damage and harm Klabin's informatized system.

Klabin's information technology and communication resources are subject to a process of collection and verification. This will be executed by designated areas in line with internal rules and always in accordance with

principles of proportionality, reasonability and the privacy of owners or holders of these resources.

The use of Klabin's logomark and visual identity on the Company's disclosures or those of its partners is only permitted following prior orientation by the Communication area and according to internal guidelines.

## INTELLECTUAL PROPERTY

Involving all the work developed by the Company, intellectual property is a component part of Klabin's equity. Ensuring its protection is the duty of all in the Company. Information, research, market negotiations, data and materials which have still not been published may only be shared according to the prevailing governance rules which establish levels of authorization for such disclosure.

Included in this category are all computers, mobile devices, environments, and digital platforms and data transmitted via e-mail under the Klabin domain or data that interact in some way in the Company's digital environments. We do not allow the storage of information in local disk and removable media. It is incumbent on the employee in possession of such data to be responsible for handling and saving files exclusively in the corporate network and/or space in cloud (in the Company's existing platform).

Employees are not permitted to install or use technological tools, software, applicative, hardware and any digital technological platform as well as services applied to these technologies, not approved by Klabin, according to the internal guidelines for cybernetic and data security. The same rules apply to third parties that use the informatized systems and the corporate domain on the Company's premises.

## RESPECT FOR PRIVACY, CONFIDENTIALITY AND USE OF INFORMATION

We are committed to the privacy, confidentiality and safekeeping of personal information collected from our investors, clients, suppliers, employees, and any other stakeholders with which we relate.

We handle this information in an ethical and confidential manner according to the internal rules and guidelines of domestic and international legislation on Personal Data Protection. Under no circumstances will this data be made available or used without prior authorization.

Employees with access to personal information must ensure the security in the way it is used as well as safekeeping, employing it appropriately and only for the purposes for which it was collected and accessed. Measures must also be taken to prevent the wrongful use and improper exposure of this information.

Personal data when no longer in use must be preserved or destroyed, including at the behest of the owner or again in such a way as not to allow its use or the partial recovery of data by other people. We underscore the importance of care with information, especially that of a sensitive and confidential nature in shared locations on the company's premises such as desks, meeting rooms and printers.

Matters internal to Klabin should not be discussed in public places or in the presence of other employees not involved in the matter as for example in elevators, during coffee breaks, in taxis and airports, etc.

Access to data of informatized systems containing confidential data shall be approved according to the internal guidelines for access. We do not allow the sharing of usernames, passwords, and accesses. Each employee or third party must have their own exclusive identification, which is personal and not transferable, characterizing them as responsible for actions executed.

Klabin's data traffic must adhere to internal guidelines to ensure that it is accessed only by the addressee(s) and to preserve the integrity of its content.

The capture of images (photography or filming) in Klabin's installations as well as their disclosure, is only permitted against prior authorization by the Communication area, otherwise risking leakage of industrial secrets and/or information of a confidential nature.

Should you become aware of any breach of data security, you should report it immediately to your manager or to the **Complaints Channel**.

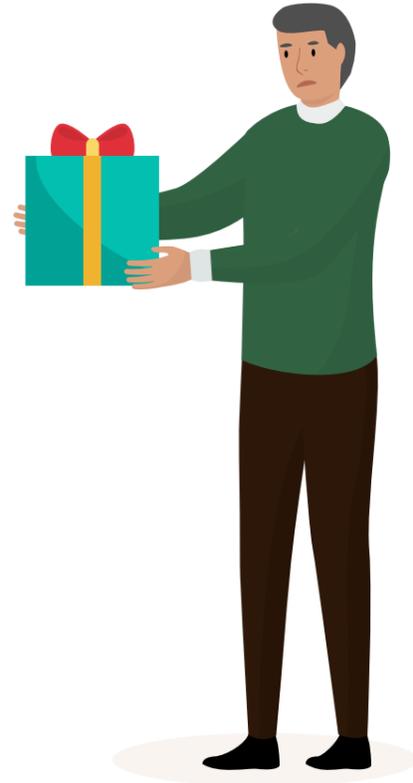
**WE SHALL CONSIDER LEAVING UNATTENDED IN A PHYSICAL OR ELECTRONIC MEDIUM, CONFIDENTIAL INFORMATION UNRELATED TO THE ACTIVITY OF THE EMPLOYEE IN THE EXERCISING OF THEIR FUNCTION AS WELL AS ITS DISCLOSURE, AS A SERIOUS CASE OF MISCONDUCT.**



## ACCOUNT REGISTERS

In their activities, all employees are responsible for the quality of information and for evaluating and giving prior notification to the Financial Control area of impacts caused by eventual changes or new processes in the businesses executed by the Company.

**We respect commitments and handle prudently the disclosure of information which adds value to the market, to the shareholders and other stakeholders, respecting accounting and corporate norms and the pertinent legislation.**



## GIFTS, PRESENTS, INVITATIONS, TRAVEL, AND COURTESIES

**We instruct our employees to refuse the offer of gifts and presents, invitations, travel, and courtesies.**

The exceptions to this rule are gifts identified as free distribution (with no commercial value, for exhibiting a brand name or advertisement and characterized as institutional), which may be given and accepted or if an employee finds himself in a situation where rejection would be interpreted as offensive to the culture of the offeror. In this case, the situation should be reported immediately to the Integrity area.

Where it is impossible to refuse or return the gift, the Integrity area must be informed for a decision on final disposal.

The receiving of monetary values, gifts (other than those of an institutional nature), presents, invitations, travel, courtesies, or other advantages in the acquisition and selling of material and services or subsequently to the managers and those involved in acquisitions/contracting, will not be tolerated. Such situations may be characterized as conflicts of interest translating into a loss of image for Klabin. In case of doubt, the Integrity area should be consulted.

Payment of meal, transportation, and accommodation expenses as part of the commercial relationship with clients is permitted conditional on adhering to the prevailing organizational policies. However, Klabin's employees shall not allow these expenses to be borne by clients, suppliers, or commercial partners,

other than in the case of costs in transit during trips for commercial ends outside the country. Should accommodation and/or transit facilities be offered as part of the program of events organized by the client, then the employee should consult the Integrity area before accepting. In the same way, the offer of presents to clients is not permitted other than those classified as institutional gifts.

All those third parties travelling at the service of Klabin must comply with the rules established in the internal guidelines for trips.

If in doubt as to any situation, see under the heading **What to do?** or consult the Integrity area.

Exceptions must be assessed by the Integrity area.

## DONATIONS AND SPONSORSHIPS

We support and encourage projects involving individuals of proven merit and corporate entities committed to social responsibility, sustainability, and the other pillars of Klabin's outreach activities.

The criteria for selecting projects are aligned to those established in Klabin's social investment platform and according to internal guidelines.

We reserve the right to submit recommendations for donations for reputational evaluation by the Integrity area in order to identify conflicts of interest which may prove an impediment for implementation.

We do not make contributions or donations to political parties, political campaigns and/or candidates to public office according to the respective legislation.

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**THESE PROJECTS MUST BE ALIGNED TO OUR INSTITUTIONAL AND MARKETING COMMITMENTS, INTERESTS, AND GUIDELINES WITH THE POTENTIAL NOT ONLY TO REINFORCE THE GOOD IMAGE OF THE COMPANY BUT ALSO THAT AIM TO HELP OTHERS.**

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## TRADING IN KLABIN'S SHARES

**Effective members and alternates with seats on Klabin's Board of Directors and Fiscal Council, external auditors, service providers, shareholders, officers, managers, and all remaining employees under their leadership as well as trusted third parties, have the responsibility of protecting and maintaining confidentiality of the Company's material information, as yet not released to the market and potentially influencing the price of securities.**

Any such material information may not be disclosed or used for personal benefit or the benefit of others pursuant to the policies of the company and the norms and sanctions published by the Brazilian Securities and Exchange Commission (CVM).

Senior managers, shareholders, and other employees with access to privileged information shall not trade (buy or sell) Klabin's shares during blackout periods in order to preserve the legitimate interests of the Company pursuant to internal policies.

On termination of the period of confidentiality, we have the duty to inform the market on any material transactions in a detailed and transparent manner in accordance with the requirements of the CVM.

# MANAGEMENT OF CONFLICTS

## WHAT REPRESENTS A CONFLICT OF INTERESTS?

A conflict of interests arises when there is confrontation between collective and individual interests of the Company and the interests of an employee or group of employees in such a way as to compromise the interests of the Company or influence the performance of the functions of that employee or group of employees in an improper manner.

Dedication to work, efforts directed towards the interests of the Company, integrity in the conducting of business and secrecy in handling facts and information of a confidential nature are attitudes we expect from senior managers, employees, and service providers.



## WHAT TO DO?

Should you detect or find yourself in a situation of conflict of interests, whether in the environment of a meeting, conversation or any other situation which may influence a decision which involves Klabin, abstain from practicing the conduct and report the situation to your immediate manager or to the Integrity and People & Management areas. If you prefer, use the Complaints Channel.

## WHAT DOES CONFLICT OF INTERESTS MEAN IN PRACTICE?

Some examples of unacceptable behavior which may lead to termination of the labor or services contract:

- Undertaking parallel activities which compromise working hours or professional performance.
- Using Klabin's resources for own benefit or that of others.
- Hiring or exercising influence in the hiring of family relations for working in direct or indirect subordination within the same hierarchical line.
- Employees with influence in procurement decisions may not hire either for themselves or others, employees or service providers which serve Klabin or, again, participate as owners, partners or managers of companies that maintain a commercial relationship with the Company.
- Soliciting sponsorships from suppliers for improvements to recreational centers, sporting events and parties, with the exception of special events and conditions receiving prior approval from the Statutory Board.
- Using the prestige of the position and/or Klabin's privileged information to an employee's own benefit or that of others.
- Disclosing unauthorized information.
- Receiving presents, gifts, invitations for entertainment, leisure travel or benefits from suppliers and service providers or clients with the exception of institutional gifts.
- Granting loans and guarantees to controllers, senior managers, and other stakeholders.
- Using equipment and resources for accessing information, electronic mail, and internet for unauthorized ends.
- Running unratified software in Klabin's equipment.
- Through the medium of commercial activities which are permitted on the premises of Klabin under internal guidelines, promoting the disclosure of products which are not permitted, or are illicit and of unknown origin, which may in some way result in loss/harm including to the health and/or the integrity of people.

## HOW TO PROCEED IN CASE OF DOUBT?

Should you have any questions on how to act in certain circumstances or take decisions within Klabin's corporate environment, please reflect:

**IS THIS CONDUCT IN ACCORDANCE WITH THE COMPANY'S PRINCIPLES AND VALUES?**

If the reply to any one of these questions is "no", it means that the conduct can be classified as anti-ethical, inappropriate or, additionally, may have negative consequences for the Company, for other people, or for you.

If in doubt, notify your manager, the Integrity or People & Management areas.

**IS THIS CONDUCT LEGAL?**

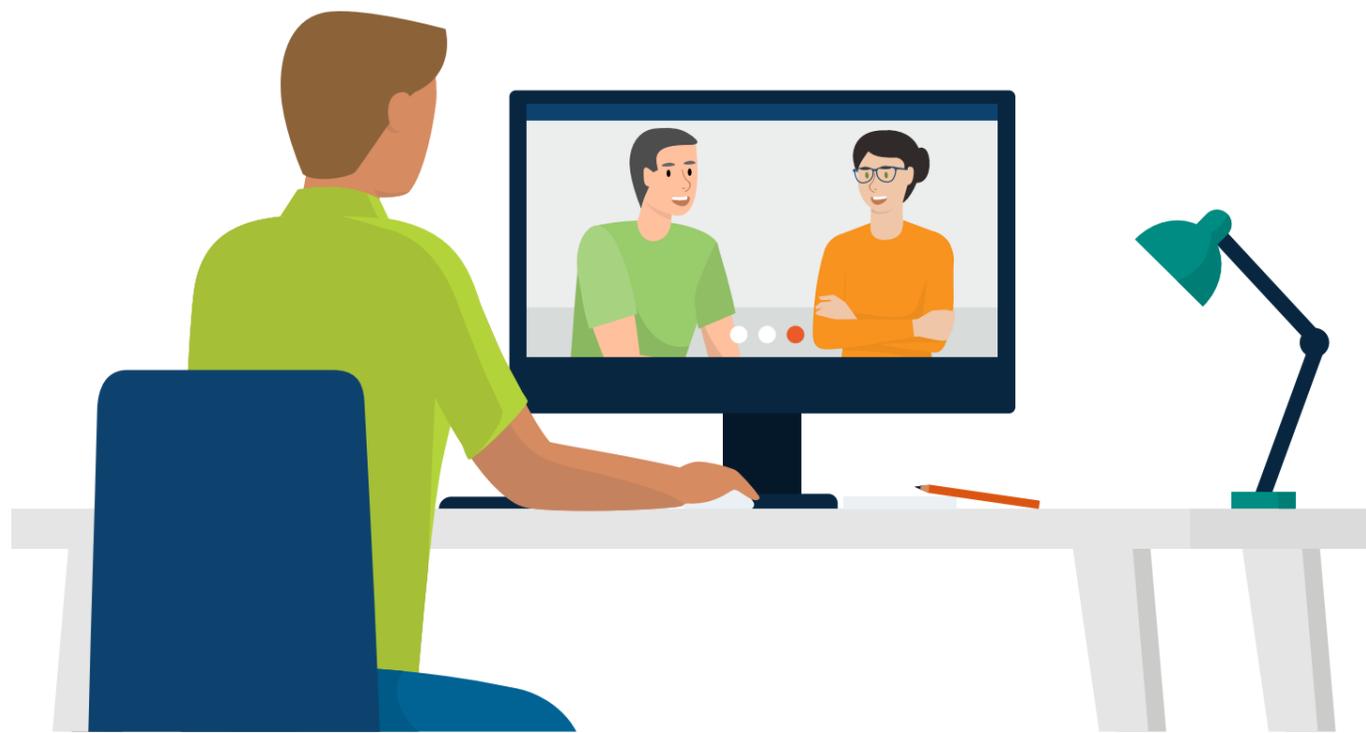
**WOULD I BE COMFORTABLE IF MY FAMILY RELATIONS AND COWORKERS WERE TO KNOW?**

# MANAGEMENT OF CONSEQUENCES

Any decision on matters that may eventually not be covered by specific policies must be based on the principles of this Code, on the prior evaluation of the facts and the formal agreement of your immediate manager.

Failure to adhere to the guidelines described in this Code and the other corporate standards shall be considered a violation, principally if it results in personal benefits or benefits to third parties or in a loss to Klabin. The perpetrator shall be subject to internal disciplinary measures which may lead to a termination of the labor contract and legal sanctions.

The imposition of measures of consequence takes into account the seriousness of the conduct and may be referred to the appropriate instance for sanctions.



# GOVERNANCE

## MANAGEMENT OF THE CODE OF CONDUCT

The management of the Code of Conduct is the responsibility of the Integrity area, together with its disclosure and its updates, the latter of which shall be approved by Klabin's Board of Directors.

On identifying situations which may bring changes to the content of this Code, be it because of laws or the updating of the Company's guidelines, all areas of Klabin should inform the Integrity area.

It is the responsibility of all that relate to Klabin, especially our senior managers and employees as a whole, to be aware and apply the guidelines of this Code.

### THIS CODE IS FOR ALL

**WE ARE ALL RESPONSIBLE FOR APPLYING AND DEFENDING THE PRINCIPLES AND PRACTICES IN THIS CODE. IF YOU SHOULD HAVE SUGGESTIONS OR ANY QUESTIONS ON ITS CONTENT, PLEASE CONTACT YOUR MANAGER OR THE INTEGRITY AREA.**

## COMPLAINTS CHANNEL

Our **Complaints Channel** is available to both internal and external audiences and is managed by an outsourced company. Reports may be submitted with the identification of the author or anonymously by telephone or accessing the internet in Portuguese, Spanish, and English.

We guarantee the confidentiality of information, identity, and non-retaliation against complainants.

Whenever you witness or suspect any infringement of Klabin's Code of Conduct, you should report a complaint.

In the event of questions or suggestions, please contact the Integrity area.



## UNFORESEEN CASES

Matters eventually not foreseen in this Code of Conduct or issues about which there are doubts, should be submitted to the

Integrity area, responsible for the evaluation and handling of matters related to integrity guidelines.

This Code has been revised by the Board of Directors at its meeting of May 28, 2021 and comes into effect immediately.

# GLOSSARY

**ABUSE OF POWER:** the act or effect of imposing the will of a hierarchical manager on a subordinate by exercising the power which is bestowed on him in the light of the position he exercises in the organization.

**COMPETITOR:** a natural or legal person that offers services or products equal or similar to those offered by Klabin. These are those equal or similar products or services which can be considered interchangeable for the uses to which they can be put.

**CONFIDENTIAL INFORMATION:** all and any information, which if disclosed either internally or externally, has the potential to result in major financial loss or harm to the corporate image.

**COURTESIES:** meals, receptions, accommodation, travel expenses, tickets, or transportation of any kind, among others, which may for example be necessary for realizing the presentation of products or of the Company's premises, invitations to take part in corporate events and festivities promoted by Klabin.

**EGM:** priority Environmental, Social and Governance aspects for Klabin, adherents to its growth plan and which establish values which the Company should deliver to society.

**EMPLOYEES:** managers, supervisors and other employees, interns (under the Internship Law) and young apprentices (when applicable in the

country of the Unit) of Klabin, its controlled companies and affiliates.

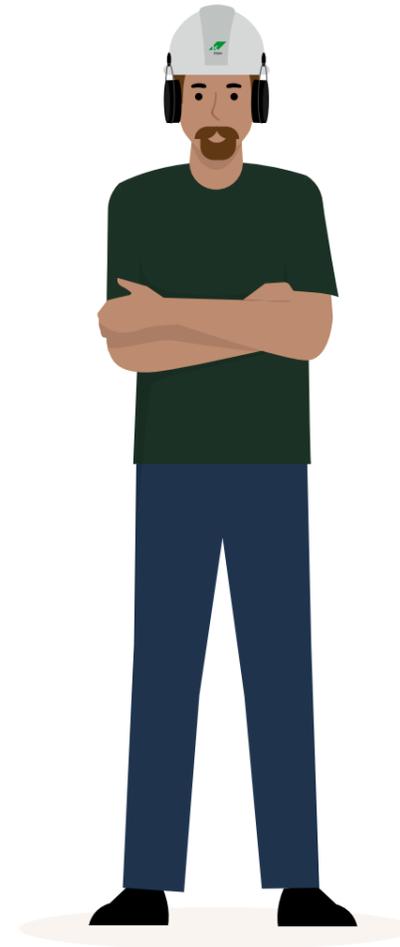
**ETHICS:** a set of rules and principles applied to the daily routine and used continually by the citizen. These rules guide the individual, orientating their actions and their judgments as to what is moral or immoral, right or wrong, good or bad.

**FAMILY RELATIONSHIP WITH DIRECT SUBORDINATION:** a workplace relationship in which managers and subordinates have a degree of kinship by blood or affinity.

**FAMILY RELATIONSHIP WITH INDIRECT SUBORDINATION:** a workplace relationship in which the manager is in a position of leadership to the manager of his family relation by blood or affinity.

**GIFT:** any item of modest cost and without commercial value with the purpose of attending strategic functions of brand recall and which may be distributed in promotional campaigns such as pens, notebooks, calendars, and diaries with the logomark of the Company.

**GOVERNMENT AGENT:** employee, civil servant and public sector



employee pertaining to Government Administration, whether direct or indirect, of any one of the Branches of the Federal Government, the States, the Federal District, and the Municipalities. Included in the category of public agents are employees (even when exercising an unpaid position or function on a transitory basis) of a company incorporated into public assets or an entity which has been set up or funded with financial resources representing more than 50% of equity or annual revenue.

**IMPROPER ADVANTAGE:** offer of something to a government or pri-

vate agent or their family members such as cash, entertainment, travel, presents and donations with the aim of obtaining benefits or privileges to the detriment of others.

**INFORMATION TECHNOLOGY AND COMMUNICATION RESOURCES:** e-mail, cell phone, notebook, and systems, among others.

**MORAL HARASSMENT:** exposure of someone to situations of humiliation, disrespect, and embarrassment.

**PARTNERS:** clients, distributors, suppliers, service providers (except those service providers already contemplated in the definition of Third Parties), startups, universities, and accelerators and all those that have a commercial or professional relationship or a relationship of trust with Klabin.

**POLITICALLY EXPOSED PERSON:** pursuant to Instruction 301 of the Brazilian Securities and Exchange Commission (CVM) is one who holds, or in the last five years, has held relevant positions, employment, or public office in Brazil or in other foreign countries, territories, and dependencies together with their representatives, family members and other persons with

whom they enjoy close relations. In the case of the other countries where the Company has operations, local practices shall apply.

**PRESENT:** any item of value which is given or received in a commercial relationship and for which the recipient does not pay a fair market value.

**SENIOR MANAGERS:** members of the Board of Directors and officers of Klabin and its controlled companies.

**SEXUAL HARASSMENT:** exposure of someone to situations of embarrassment with a view to obtaining advantages and/or sexual favors.

**SHAREHOLDER:** holder of the Company's shares.

**THIRD PARTY:** natural or legal person representing the interests of Klabin or that manifests on behalf of Klabin, irrespective of the existence of a power of attorney or contractual formalization, including, but not limited to advisers, consultants, accountants, intermediaries, lawyers and despachantes.

**WORK ANALOGOUS TO SLAVERY:** exploitation of adult labor a set forth in the Penal Code.



# COMMITMENT INSTRUMENT

I declare to have read, to have been informed of the content in training and/or in a meeting with my immediate manager, and to have received a copy of Klabin's Code of Conduct. I undertake to fulfill and ensure full and permanent compliance with the guidelines and moral principles which orientate our internal and external relationships.

**NAME** \_\_\_\_\_

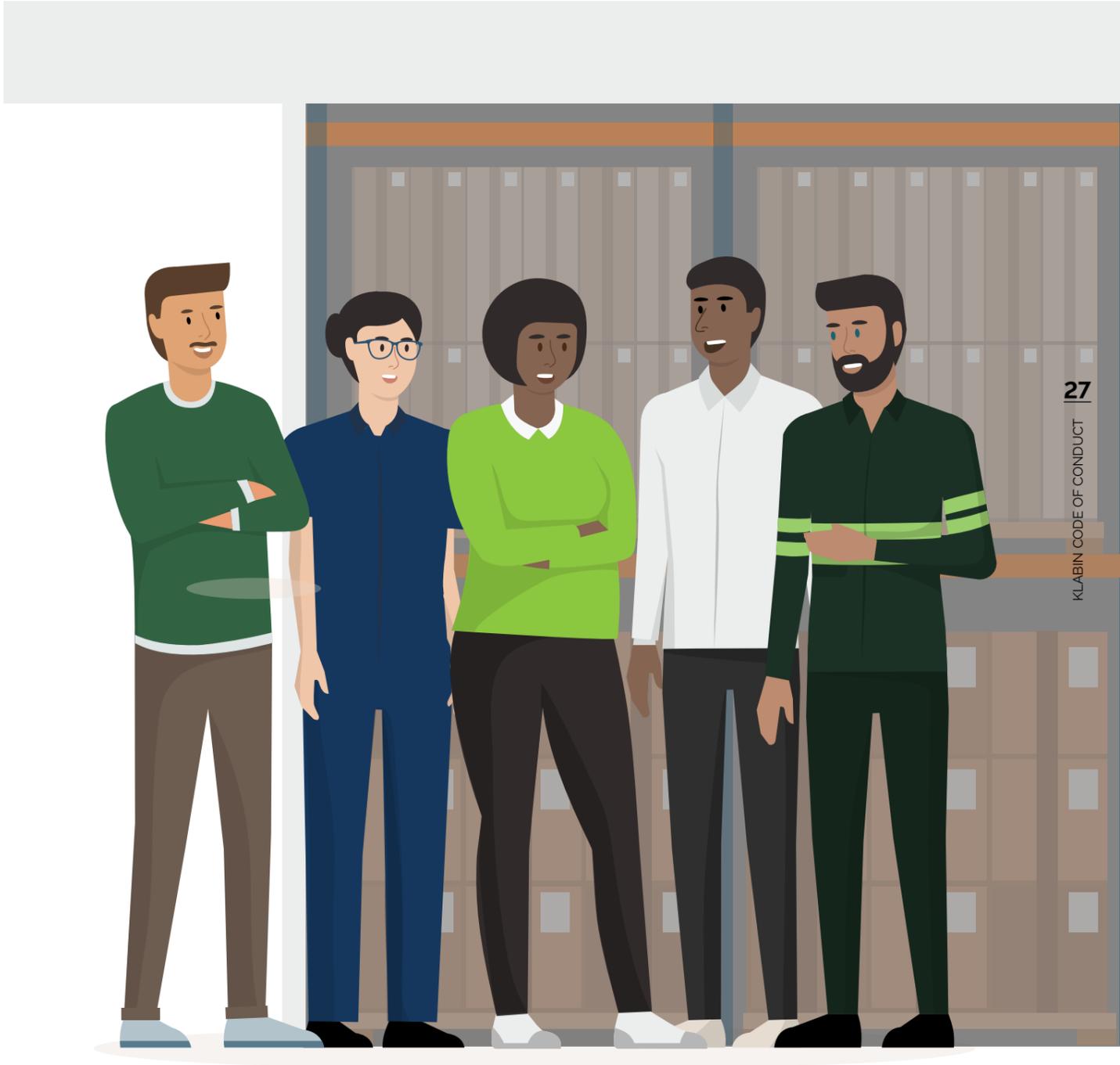
**POSITION** \_\_\_\_\_

**DEPARTMENT** \_\_\_\_\_

**LOCATION** \_\_\_\_\_

**DATE** \_\_\_\_ / \_\_\_\_ / \_\_\_\_

\_\_\_\_\_  
**SIGNATURE**





Klabin

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