

<b>Title:</b>	<b>Internal Auditing Policy</b>		
<b>Issuing area:</b>	<b>00.Corporate Policy</b>	<b>Date:</b>	<b>05/18/2021</b>
<b>Code:</b>	<b>PC.00.0025</b>	<b>Review:</b>	<b>1</b>

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## **1 – OBJECTIVE**

This Policy describes the principles and initiatives related to Suzano S.A.'s internal auditing process, with the intent of minimizing business risks and contributing to reaching its results.

## **2 – REFERENCE DOCUMENTS**

- International Standards for the Professional Practice of Internal Auditing – IIA (Institute of Internal Auditors)
- Code of Ethics – IIA
- Internal regulation of the Statutory Auditing Committee
- POL.00.00006 – Ombudsman's Office Policy
- POL.00.00029 – Disciplinary Measures Policy
- MAN.00.00002 - Code of Conduct

## **3 – TERMS, DEFINITIONS AND ABBREVIATIONS**

### **3.1 COSO**

Committee of Sponsoring Organizations of the Treadway Commission

### **3.2 IIA**

Institute of Internal Auditors

### **3.3 SOx**

The United States Sarbanes-Oxley Act, passed on July 30<sup>th</sup>, 2002.

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## 4 – GUIDELINES

### 4.1 PRINCIPLES

The three pillars of auditing are:



#### 4.1.1 Commitment

Suzano reinforces its commitment to keep the impartiality and independence in its internal auditing processes through a systematic and disciplined approach to the assessment and improvement of the efficacy of risk management, control and governance processes, as well as act as the 3<sup>rd</sup> defense line for assessment and consulting, developed to add value and improve corporate operations.

#### 4.1.2 WHAT WE DO

Internal Auditing is the area in charge of reviewing, at least every four years, all current operations of the organization in order to assess the effectiveness of policies and procedures set out by high management, as well as the efficiency and efficacy of internal controls set, ensuring fulfillment of ethical and integral requirements and avoiding possible deviations related to compliance in the Company's business and activities.

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Such work intends to assist the Company's leaderships in the effective performance of their roles and responsibilities, providing them with critical analysis related to managerial processes audited, as well as recommendations of preventive and corrective nature directed to continuous improvement of Suzano's business control structures.

#### 4.1.3 HOW WE DO IT

In order to ensure continuous improvement and transparency of our Internal Auditing processes, it administratively reports to Suzano's CEO and operationally to the Auditing Committee and the Administrative Board.

The Auditing Committee meets every quarter and is responsible for assessing and approving the annual audit plan, as well as for analyzing indicators and corrective or improvement actions observed during the audits, and also the highlights related to SOx Audit, Indicators of Always-On Audit, investigation cases and Ombudsman Office's indicators.

The Audit Board is organized in the following 5 areas:

- **Process Auditing** – In charge of assessing the effectiveness and efficiency of governance, risk management and control processes in order to help the organization reach its strategic, operational, financial and compliance goals through the annual audit plan, as well as offering assessment and consulting objective and independent services developed to add value and improve Suzano S.A.'s operations.
- **Always-On Audit** – In charge of process risk, SOx and fraud continuous monitoring, and acting on process, control and impact reduction improvement.
- **Investigative Audit** – In charge of investigating the report of accusations related to fraud and providing support in harassment cases. Correction of vulnerabilities found.
- **SOx Audit** – In charge of independent assessment of the internal control environment and the effectiveness of SOx controls, as well as the anticipation of process deficiencies, with the goal of providing the Company, and internal and external stakeholders, with reasonable transparency and security under the control environment. Besides the SOx

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Audit, internal controls efficacy undergoes assessment of an independent public accounting firm.

- **Ethics and Ombudsman's Office** – In charge of managing the ethical pillars and the ombudsman channel, which includes both updating and maintaining the Code of Conduct, which has the goal of maintaining the ethical principles that guide our business conduct, in addition to spreading them throughout our networking, and the commitment to corporate transparency, equality, accountability and responsibility, as well as ensuring human rights within our operations, and also regarding the receipt of reported accusations and the due forwarding for assessment and return with a response to the whistleblower, applying disciplinary measures when applicable.

## **5 – RESPONSIBILITIES**

The Audit Board is responsible for developing content, reviewing, implementing and spreading this Policy.

## **6 – POLICY APPROVAL**

This Policy comes into effect for an indefinite time on the date of its approval by Suzano's Audit Board.

Suzano S.A.'s Audit Board has exclusive power to change this Policy.

**Note 1: If required, copies of the deliberation on the change or review of the Policy can be submitted to the stakeholders.**

## **7 – POLICY BREACH**

Any breach of this Policy should be reported through the Ombudsman confidential channel and should be dealt with according to Suzano S.A.'s Code of Conduct.

- Phone Number in Brazil: 0800 771 4060
- Phone Number Abroad: Find specific number in the website
- E-mail: [ouvidoriaexterna@austernet.com.br](mailto:ouvidoriaexterna@austernet.com.br)

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- Site: [www.suzano.com.br](http://www.suzano.com.br), link “Ouvidoria” (Ombudsman’s Office)

## **8 – FINAL CONSIDERATIONS**

This Policy was developed observing the roles and responsibilities of each area of Suzano S.A.’s Internal Auditing based on the ethical principles for the work and practice of Internal Auditing.

## **9 – APPENDIXES**