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1 – PURPOSE

To establish the process and governance guidelines for the Area and Ombudsman Channel's action regarding compliance with applicable legal and regulatory provisions, as well as internal regulations and codes, including the provision of specific whistleblower protection procedures and the confidentiality of information.

2 - SCOPE

The policy covers the directors, officers, administrators, managers, stockholders, employees, outsourced employees, suppliers, customers, persons or entities whom we have a relationship with, and interested parties of Suzano S.A. and its subsidiaries and affiliates.

The Ombudsman Channel may be used by any person inside or outside the company, for the specific reporting of perceived violations in the business environment and related to the guidelines and behaviors set forth in the Code of Conduct, in addition to violations of ethics, laws, regulations to which the company is subject, as well as internal rules and procedures, and may also be used to clarify questions regarding the Code of Conduct or related to situations not provided for in such document.

2.1. Data Protection

This Policy may only be applied by direct or indirect subsidiaries or affiliates located outside Brazil to the extent that they do not conflict with the laws and regulations of their respective countries, especially the Data Protection rules in force in the European Union.

3 – REFERENCE DOCUMENTS

- Corporate Governance Policy;
- Anti-Corruption Policy;
- Related Party Policy;
- Disciplinary Measures Policy;
- Code of Conduct.

4 – DEFINITIONS AND ABBREVIATIONS

4.1. Ethics and Ombudsman

Area responsible for ethics and Ombudsman Channel management.

4.2. Ombudsperson

A member bound or indicated by the Ethics and Ombudsman Area, liable for, among others, the intermediation of real and potential conflicts, and besides an ethical, professional and independent attitude in dealing with issues, a special attention to the principles and rules of behavior that guide the good practices of corporate governance is required for such capacity.

4.3. Code of Conduct

Document made available to all employees and the general public that aims to disseminate the Company's ethical values, guided by Corporate Governance, Integrity, Equality, Transparency, Professional Appreciation and Sustainable Development, which should guide the expected behavior with all those we have a relationship.

4.4. Ombudsman Channel

Outsourced channel dedicated to receiving anonymous or otherwise reports, involving potential violations of conduct, policies, internal procedures, laws and regulations. Contact may be made through the website, telephone numbers and email provided in the Code of Conduct.

4.5. Conduct Committee

Consisting of members of Suzano S.A.'s management to promote ethical behavior, monitor compliance with the principles of the Code of Conduct, analyze and resolve on conflicts and misconduct and apply appropriate penalties in cases of proven violations.

To learn more about the Committee's objectives, composition, duties and responsibilities of its members, as well as its operating guidelines, please refer to the "Conduct Management Committee's Bylaws" available on Suzano S.A's documentation system.

4.6. Complaint

Presenting a situation that is not in accordance with the legal system, policies, internal and external regulations, laws and behaviors defined in the ethical pillars.

4.7. Auster

External company contracted with the responsibility to receive and record the Company's complaints.

4.8. Anonymity

The one without identification, there is no association with name or signature.

4.9. Mobbing

Exposure of employees to repetitive and prolonged humiliating and embarrassing situations during the workday and in the performance of their duties.

4.10. Sexual harassment

Unwanted verbal, nonverbal or physical sexual behavior with the purpose or effect of disturbing or embarrassing a person, affecting his or her dignity, or creating an intimidating, hostile, degrading, humiliating or destabilizing environment.

4.11. Behavioral deviation

Characterized by persistent patterns of socially inappropriate, aggressive or defiant conduct, in violation of social rules or individual rights, which may characterize discomfort or affect image or human rights through gestures, attitudes and comments of discrimination.

4.12. Fraud

Deliberate unlawful and dishonest action to deceive someone for the purpose of securing self or third parties' benefit in order to obtain personal, financial and other advantages.

4.13. Stakeholders

Any person or organization that has a direct or indirect interest or relationship with Suzano S.A. or that may be influenced by its activities, i.e. owners, stockholders, employees, service providers, customers, suppliers, partners, communities, NGOs, associations, creditors, government and society.

5 – GUIDELINES

5.1. Structure

The Ethics and Ombudsman area is linked with the Audit Board, which has a direct bound with the Presidency, Executive Board, Audit Committee and the Board of Directors of Suzano S.A.

The purpose of this structuring is to ensure to Ombudsman impartiality and independence in the analysis and handling of reported occurrences, as well as the preservation of the whistleblower, as required by law for this type of process and also in line with the best practices for corporate governance.

5.2. Misconduct

Actions, decisions and behaviors that are in disagreement with the principles set forth in the Company's Code of Conduct, values, management beliefs, policies and procedures, as well as laws and agreements (voluntary or mandatory) executed by Suzano S.A. are considered as misconduct and, as such, deserve disciplinary measures proportionate to the situation found.

5.3. Whistleblower Channel

Whistleblower Channel which deals with matters in a confidential and independent manner with respect to the whistleblower, ensures anonymity, and is offered to employees and the general public for the forwarding of reports and complaints about issues that may be violating the business ethics.

Data for access and contact information is available in the Code of Conduct, containing website information, telephone numbers and email for incident records.

5.4. Registration and Protocol

The cases received are registered in a third party computerized system, which is located in an autonomous environment of Auster, engaged to ensure the integrity and confidentiality, which is responsible for receiving and recording the information directed to the treatment of Suzano S.A., and the other way of receipt is by direct contact with Internal Audit, which ensures the same conditions of anonymity to protect the whistleblower.

All services generate a protocol to the whistleblower who, through this code, may return to Ombudsman to follow up the response to his or her statement or even add new information on the

subject under consideration or answer any questions posted by the Ombudsman team in the system to enrich investigations.

5.5. Treatments

In case of reporting, Ombudsman needs a detailed report of the fact, with the maximum available information about the reported situation (dates, place, names of the involved persons, addresses, among other data), as well as sending, whenever possible, documents proving the irregular or unlawful act and enabling the objective investigation of the facts. Otherwise, the Ombudsman will request the necessary information from the whistleblower to continue the analysis and, if it does not receive the appropriate clarifications, it may file the demand for lack of evidence, which will be reported to the whistleblower.

The ombudsperson will distribute the complaints received to the responsible areas, which shall raise and analyze the situations as follows:

- Legal
General legal issues or contract matters;
- Human Resources
Mobbing/sexual harassment, discrimination, inappropriate behavior and general labor issues;
- Internal Audit
Fraud, embezzlement, conflict of interest, misuse of resources, receipt of bribes, forgery, leakage of information and others;
- Third Party Contract Management
Matters involving labor issues of third party companies.

Upon receipt of the complaint and the distributed case, the gathering of information and evidence to ascertain the facts and evaluation of the result begins, which result is classified in three ways: well founded, unfounded or inconclusive. Complaints shall be ascertained within 30 days (extendable upon formal request) and after its expiration they are first submitted to the Conduct Subcommittee, which evaluates the application of consequences and action plans for subsequent validation and final decision by the Conduct Committee. In case of jurisprudence on certain occurrences, and in common agreement with the respective manager, the measures will be applied directly and only reported to the Conduct Committee for proper knowledge.

Unforeseen situations, controversies or even ethical dilemmas not addressed by Suzano S.A. in the Code of Conduct will be dealt with through specific investigation and submitted to the extraordinary meeting of the Conduct Committee for consideration and definition of the negotiations.

Cases of unfair competition and cases of corruption in the public-private sphere will be referred by the Ombudsman for analysis and handling of the Legal Area with the proper support of the Internal Audit Area.

5.6. Reply to Complaint

Following the evaluations by the Conduct Subcommittee and Committee, the results of the treatments of complaints are recorded in the system of the outsourced company, Auster. Thus, it is noteworthy that the status of investigation of complaints are available for consultation according to the registration number provided in the first service.

6 - RESPONSIBILITIES

6.1. Ombudsman Area

Ombudsman shall be liable for:

- Receiving cases received through the communication channels with the Ombudsman, which are made available by the company, ensuring the secrecy and confidentiality of the information and people involved.
- Sorting through the reports received, and when appropriate, directing them for investigation and treatment by the areas or managers responsible for the topic.
- Critically analyzing the data, evidence, clarifications and action plans received from the areas upon the conclusion of the process negotiations, issuing recommendations for improvements in order to reformulate the decisions with the internal areas and instances, when appropriate.
- Returning the appropriate information to the whistleblower when the cases opened in the Ombudsman are concluded.
- Submitting reports and periodic records to Suzano S.A.'s governance bodies.
- Clarifying any doubts regarding the operation of the Ombudsman and its processes.

The cases will be referred for investigation according to the topic, and distributed to the responsible areas (Legal, Human Resources, Internal Audit and Third Party Contract Management).

Note: Complaints about the Ombudsman and Internal Audit

The cases received will be directed for evaluation by the Coordinator of the Conduct Management Committee who will take appropriate measures to conduct the investigation independently.

6.1.1. Legal

The Company's legal department is liable for investigating all complaints under its management, gathering the necessary information, documentation and opinions, then analyzing the evidence and completing the investigation. Upon completion, the final report should be forwarded to the Ombudsman for due consideration.

6.1.2. Human Resources

The Company's Human Resources area is liable for investigating all complaints under its management, gathering the necessary information and documentation, conducting interviews, evaluating the performance of the accused and verifying the "climate" of the area, then analyzing the evidence and concluding the investigation. Upon completion, the final report should be forwarded to the Ombudsman for due consideration.

6.1.3. Internal Audit

The Company's Internal Audit is liable for investigating all complaints under its management, gathering the necessary information and documentation, conducting interviews and relationship surveys, then analyzing the evidence and completing the investigation. Upon completion, the final report should be forwarded to the Ombudsman for due consideration.

6.1.4. Third Party Contract Management

The Company's Contract Management Area is liable for investigating all complaints related to non-compliance with labor obligations involving service contracts, gathering the necessary information and documentation to then analyze the evidence and conclude the investigation. Upon completion, the final report should be forwarded to the Ombudsman for due consideration.

6.1.5. Other areas

The other areas are liable for treating matters received with dedication, ethics, respect, responsibility and confidentiality, as well as formally reporting to the Ombudsman the conclusion of the processes in a transparent and integral manner.

6.2. Conduct Management Committee

It is liable for:

- Strengthening the application of the Code by proposing actions for update, dissemination and compliance herewith.
- Establishing criteria for dealing with situations not provided for in the Code.
- Settling controversial situations.
- Equating ethical dilemmas.
- Ensuring uniformity of the criteria used in the resolution of similar cases.
- Defining and applying fair disciplinary measures.

6.3. Whistleblower

To report any suspicion and/or situation that is not in accordance with the Code of Conduct, current laws or internal policies/procedures, with complete and objective information, aiming to answer the following questions: what? who? when? where? why? and how?, when contacting the Ombudsman through the communication channel.

It is at the whistleblower's discretion to be identified or to remain anonymous. In addition, he or she may also follow the process through the code of registration of the complaint received, with return within 30 days.

Suzano S.A. will take the necessary measures to protect the whistleblower who, in good faith, make complaints with the purpose of preserving the company's ethical principles, ensuring non-retaliation.

6.4. External Ombudsman (Auster)

Auster, an outsourced company, is responsible for recording all reports received and directing them to Suzano SA's handling. In addition, Auster is responsible for providing/managing the response for whistleblower's query through the registration number provided in the first contact.

6.5. Tracking and Report

The Ethics and Ombudsman Area reports quarterly data and follow-up information from the Ombudsman Channel, involving the consolidated numbers, occurrences, indicators, disciplinary measures and others to the Conduct Committee, through a previously scheduled meeting.

When requested, the Ethics and Ombudsman Area will report data and follow-up information from the Ombudsman Channel, involving the consolidated numbers, occurrences, indicators, disciplinary measures and others to the Audit Committee and Board of Directors.

Regardless of the periodic minimum meetings already provided for in the Ombudsman's calendar with the aforementioned instances, it may at any time call or meet with such bodies on a timely basis when it becomes aware of matters or situations deemed critical.

6.6. Secrecy and confidentiality

We treat confidentially all information related to the complaints and their findings, and all members of the Conduct Committee and Subcommittee, and their persons related to the management of ethics, shall sign a secrecy and confidentiality agreement whereby they undertake to be diligent in dealing with and retaining information to which they have access due to the functions performed before the Ombudsman.

6.7. Approval

This Policy came into force in 2019 and was reviewed and approved by the Board of Directors at the meeting held on xx/xx/2019.

6.8. References

- SARBANES & OXLEY LAW (of June 30, 2002) - SOX;
- LAW 12,846 (of August 1, 2013) – Brazilian Anticorruption Law.

7 - ASSOCIATED BUSINESS RISKS

7.1. Compliance risks

7.1.1. Internal

- Not compliance with rules and procedures.

7.2. Operational risks

7.2.1. Processes

- Inefficiency.
- Misuse of assets

7.2.2. Technology and information processing

- Undue access.

7.2.3. Righteousness / Ethics

- Unlawfulness.
- Frauds.
- Unauthorized use.
- Unethical management.

8 - ATTACHMENTS
