

<b>Title:</b>	<b>Anti-Corruption Policy</b>		
<b>Area:</b>	<b>00.Políticas Corporativas</b>	<b>Date:</b>	<b>Dec 29, 2023</b>
<b>Code:</b>	<b>PC.00.0005</b>	<b>Revision:</b>	<b>2</b>

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## 1 - OBJECTIVE

This Policy establishes the guidelines and criteria for fighting acts of Corruption and Bribery against the Brazilian and international governments, as well as against private entities, their employees, managers, representatives or related Third Parties.

### 1.1 - SCOPE

This Policy applies to Suzano, its subsidiaries, associated companies, directors, executive officers, managers, shareholders, administrators, representatives, Employees, and contractors, regardless of their position or function performed, as well as any Third Parties representing Suzano, in any capacity, in Brazil or abroad, always respecting the documents of incorporation and the applicable jurisdiction.

## 2 – REFERENCE DOCUMENTS

### External references:

- BACEN Resolution 3,978/2020;
- Brazilian Anti-Corruption Law (Law 12,846/2013) and Decree 11,129/2022;
- Brazilian Criminal Code (Decree-Law 2,848/1940);
- COAF Resolution 40/2021;
- Money Laundering Law (Law 9,613/1998);
- OECD Anti-Bribery Convention;
- UK Bribery Act; and
- U.S. Foreign Corrupt Practices Act (FCPA).

### Internal references:

- Code of Ethics and Conduct;
- Conflict of Interests Policy;

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- Disciplinary Measures Policy;
- Gifts, Entertainment and Hospitality Policy;
- Guide for Relations with Government Officials;
- Social and Environmental Investment and Donations Policy; and
- Supplier Code of Conduct.

### 3 – TERMS, DEFINITIONS AND ABBREVIATIONS

For the purposes of this Policy, the terms used herein will have the following meanings:

**Acts against Public Administration:** for the purposes of this Policy, the term has the meaning attributed by article 5 of Law 12,846/2012 (Brazilian Anti-Corruption Law).

**Applicable Anti-Corruption Laws:** all Brazilian and international anti-corruption laws and regulations in force in all the locations where Suzano operates, including, but not limited to, the Brazilian Anti-Corruption Law (Law 12,846/2013), the Brazilian Criminal Code (Decree-Law 2,848/1940), the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

**Bribery:** the act of offering, giving, requesting or receiving money, present or another advantage, directly or indirectly, to induce any action, inaction, improper influence or advantage, dishonest or illegal act or breach of confidence in the performance of functions. Offering anything, including favors, jobs, internships, conveniences, donations or favorable opportunities to people, directly or indirectly, that may unduly benefit Suzano’s businesses may be deemed a form of bribery. This definition applies to unfulfilled promises as well.

**Corruption:** (i) giving or receiving, promising or offering, directly or indirectly, money or Improper Advantage to national or foreign Government Officials (e.g.: obtaining, retaining or directing business, ensuring, facilitating or accelerating the execution of services); (ii) financing, in any manner, illegal acts against Government, directly or indirectly; (iii) using an

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individual or legal entity intermediary to conceal or disguise one’s interests or identity of the beneficiaries of wrongful acts; (iv) manipulating, thwarting, preventing, defrauding or obtaining Improper Advantage in bidding processes and agreements with the Government; and (v) hindering investigations or inspections by Government bodies or Officials or obstructing or interfering in their activities.

**Due Diligence or Background Check:** organized and extensive research conducted to identify potential risks associated with the formalization of any type of relationship.

**Employee:** all and any individual who works directly at Suzano S.A., including its executive officers, employees, interns, and trainees.

**Entertainment:** tickets to concerts, plays, sports games, and invitation to events, among others.

**Facilitation Payments:** payment of any amount or grant of any Improper Advantage to Government Officials in order to ensure, facilitate or accelerate the execution of a routine procedure or service (e.g.: processing of documents, issue of visas, licenses or authorizations).

**Fraud:** means obtaining for oneself or others, illegal advantage to the detriment of others, inducing error or misleading someone by using ruse, trick or any other fraudulent means.

**Gifts:** items **without any commercial value**, distributed as **promotional item** by entities of any nature as a souvenir, advertisement, publicity or during events or commemorative dates. Also, items **with commercial value not deemed Hospitality and not promotional** in nature, such as products, equipment, services and discounts for events are considered Gifts.

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**Government:** any direct or indirect government body, department, or entity of any branch of the Federal Government, the Federal States, Federal District and Municipalities, government and state-controlled companies<sup>1</sup>, any legal entity that is part of public property, state bodies or entities or diplomatic representations of foreign countries or any legal entity directly or indirectly controlled by the government of foreign countries or international public organizations.

**Government Official:** (i) all and any individual who, by virtue of election, nomination, designation, contract or any other form of investiture or association, holds office, position, job or function at a legal entity that is part of the government, directly or indirectly, at any level; (ii) any employee, authority or worker of a political party; (iii) any candidate for public office; and (iv) any former government official who has not completed the cooling off period established for the sector where they worked as government official.

**Hospitality:** expenses with goods and services related to road, air or water transportation, travel, lodging, meals, invitations to seminars, lectures, congresses, meetings, workshops or other events associated with Suzano’s activities or its field of activity.

**Money Laundering:** the act of hiding or dissimulating the nature, origin, location, disposition, movement or ownership of goods, rights or values arising, directly or indirectly, from illicit acts or conduct classified as a crime.

**Politically Exposed Person (PEP):** a person who, in the last five years, has been performing / performed a prominent public function or has been holding / held a high-ranking<sup>2</sup> position in the Government.

<sup>1</sup> Except of public companies established under the People's Republic of China law.

<sup>2</sup> Article 1 Persons subject to the oversight of the Council for Control of Financial Activities (COAF), pursuant to articles 9 and 14, paragraph 1 of Law 9,613, of March 3, 1998, must take the measures envisaged in this Resolution to monitor the operations or proposals for operations involving politically exposed persons.

Paragraph 1: For the purposes of this Resolution, the following are considered politically exposed persons:

I - persons elected to office in the Executive and Legislative Branches of the Federal Government;

II - persons holding the following positions in the Executive Branch of the Federal Government: a) Minister of State or equivalent; b) of Special Nature or equivalent; c) President, Vice President and Director, or equivalent, of independent government entities; and d) Senior Management and Advisory (DAS) of level 6 or equivalent; III – members of the National Justice Council, Supreme Court, Superior Courts, Federal Regional Courts, Regional Labor Courts, Regional Electoral Courts, Superior Council of Labor Courts and the Federal Justice Council; IV – the members of the National Council of the Public Prosecution Office, the Attorney General, Deputy Attorney General, Federal Labor Prosecutor, Federal Military Prosecutor, Deputy Federal Attorneys General and State and Federal District Attorneys General;

V - members of the Federal Accounting Court, Federal Attorney General and Deputy Attorneys General of the Prosecution Office at the Federal Accounting Court;

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**Private Corruption:** giving or receiving, promising or offering, directly or indirectly, money or Improper Advantage to people who are employed by private entities, such as employees, administrators, representatives and related Third Parties.

**Third Parties:** individuals or legal entities acting on behalf, in the interest or for the benefit of Suzano, including those that have commercial relations with the Company (e.g.: clients, suppliers, service providers, etc.). Third-Party Intermediaries (TPI) are individuals or companies acting as agents of Suzano, on its behalf or representing it before local or foreign Government Officials (e.g.: agents, consultants, commercial representatives, lawyers, forwarding agents, among others).

**Improper Advantage:** any tangible or intangible asset offered, promised or delivered directly or indirectly for the purpose of unduly influencing or rewarding any act, decision or inaction by a person, whether or not a Government Official. It includes Gifts, Hospitality and Entertainment, as well as donations or sponsorships aimed at unduly influencing someone.

## 4 – GUIDELINES

### 4.1 – Prevention of Corruption and Bribery

Suzano declares it has **zero tolerance to corruption** and that it operates in compliance with Applicable Anti-Corruption Laws, especially, but not limited to, the Brazilian Anti-Corruption Law (Law 12,846/2013) and the decree regulating it (Decree 11,129/2022), the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act, always paying attention to the most restrictive guidelines.

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VI - National presidents and treasurers, or equivalent, of political parties; VII – State and Federal District Governors and Secretaries of State, State and District Deputies, Presidents (or equivalent) of independent state and district government entities and Chief Justices of the Courts of Justice, Military Courts, Accounting Courts or equivalent at the States and Federal District; VIII – Mayors, Councilors, Municipal Secretaries, Presidents (or equivalent) of independent municipal government entities and Chief Justices of Municipal Accounting Courts or equivalent. Paragraph 2: For the purposes of this Resolution, the following persons in other countries are also considered politically exposed persons: I – heads of state or heads of government; II – high-ranking politicians; III – persons holding high-ranking positions in the government; IV – general officers and high-ranking members of the Judiciary; V - high-ranking executives in government companies; VI – leaders of political parties.

Paragraph 3: For the purposes of this Resolution, high-ranking leaders of entities governed by public or private international law are also considered politically exposed persons.

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Hence, the stakeholders covered by this Policy **are not authorized** to carry out any action characterized as an act of **Corruption, Bribery, Private Corruption, Acts against Public Administration**, or wrongdoing in relations with Government Officials or Government or private entities.

Also, Employees and Third Parties must always be alert and not ignore any warning signs of possible violations of this Policy.

#### **4.2 – Relations with Government and Government Officials**

Relations with Government entities and Government Officials are key for the execution and development of Suzano’s businesses, but must be carried out, by its Employees and Third Parties, with integrity and transparency, observing the procedures and rules applicable to respective interactions, such as the guidelines of this Policy and the Guide for Relations with Government Officials.

Such interactions may occur due to diverse needs, and can be administrative interactions, which do not require decisions to be taken by Employees or Third Parties, or strategic, which require them to take decisions.

All kinds of interaction require attention and specific care. Hence, for the detailed guidelines on interacting with Government entities and Government Officials, read the **Guide for Relations with Government Officials**.

#### **4.3 – Gifts, Entertainment and Hospitality**

Suzano understands that offering and receiving Gifts, Entertainment and Hospitality are relevant for the business and accepted in diverse cultures. However, they may also be deemed as a way to carry out acts of Corruption, Bribery and Acts against Public Administration, especially if offered to/received from Government Officials.



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No act of offering or receiving Gifts, Entertainment and Hospitality may be intended to influence decisions, obtain any Improper Advantage or cause embarrassment and exposure of the Company, its Employees, Government Officials and Third Parties.

For other instructions, read the **Gifts, Entertainment and Hospitality Policy**.

#### **4.4 - Political Contributions**

Any type of support, contribution, donation, sponsorship or investment on behalf of Suzano to institutions, parties and/or candidates associated with the political scenario and of a political / partisan nature in any location where Suzano operates is **strictly forbidden**.

Suzano respects the participation of its Employees in political activities, provided these are personal, outside working hours and the workplace, and do not give the appearance of an initiative on behalf of Suzano.

For more information, read the **Guide for Relations with Government Officials**.

#### **4.5 - Donations and Sponsorships**

Cooperation, donations, social and environmental investments, and sponsorships must be carried out with impartiality, transparency and in accordance with the admissibility criteria established in the **Social and Environmental Investments and Donations Policy**.

To ensure compliance with this Policy, all cooperation, donations, social and environmental investments, and sponsorships must comply with applicable laws and its procedural developments and must pass through all stages of Suzano's internal assessments. (e.g.: evaluation of demands in the corresponding committees and insertion in the interested party system, among others).

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The following initiatives are **strictly forbidden**: (i) those that create the expectation of an exchange of favors or Improper Advantage; (ii) that are characterized as conflict of interests; or (iii) that adversely affect Suzano's reputation.

#### 4.6 - Mergers and Acquisitions

Suzano must ensure that corporate Mergers and Acquisitions are preceded by a thorough, impartial, and unbiased assessment to identify any actions that could possibly result in the succession of any liabilities covered by Applicable Anti-Corruption Laws.

Once an operation is concluded, Suzano must conduct Due Diligence of compliance with Applicable Anti-Corruption Laws and take all the necessary measures immediately to ensure compliance.

#### 4.7 - Money Laundering

Suzano condemns any initiative related to money laundering and other illegal forms of concealing or legitimizing illegal financial resources, as well as financing of terrorism.

The Company has control and prevention mechanisms to fight money laundering and makes sure that its financial resources are not and will not be used for such purposes.

#### 4.8 – Books and Records

Suzano's accounting and financial records must reflect accurately, clearly, thoroughly and in adequate detail, all businesses and operations carried out, and must ensure a robust system of accounting controls and that all assets are duly controlled and accounted for.

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False, misleading, or incomplete entries in the system of accounting controls or other documents of Suzano are strictly forbidden. As such, any simulation and/or tampering with an operation will be deemed a serious violation of this Policy, subject to disciplinary measures and applicable sanctions.

#### 4.9 - Facilitation Payments

Though permitted by local laws in countries where Suzano operates or does business, **Facilitation Payments** by Employees and/or Third Parties is not permitted under any circumstances.

#### 4.10 - Politically Exposed Persons (PEP):

As defined in this Policy, **Politically Exposed Persons (PEP)** are those who, in the last five years, have been performing / performed a prominent public function or have been holding / held a high-ranking position in the Government.

Due to their position and function, PEP have higher exposure to acts of **Corruption and Bribery** and **Acts against Public Administration**. As such, any relationship with such persons, as well as their family members, close employees and companies in which they hold any interest must be treated with tremendous caution and diligence.

Hence, all initiatives involving PEP, their family members, close collaborators, representatives and others must be preceded by Due Diligence by the **Compliance area**.

#### 4.11 – Third Parties

Third Parties or persons related to them acting on behalf of Suzano are not authorized to carry out any action characterized as an act of **Corruption, Bribery, Private Corruption, Acts against Public Administration** or wrongdoing in relations with Government Officials or Government or private entities, including **Facilitation Payments**.

Suzano will only do business with Third Parties that comply with its ethical, integrity and transparency standards. Contracts and/or partnerships with Third Parties, including Third-Party Intermediaries, as well as the maintenance of

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such relations, can occur only after Due Diligence or Background Check is conducted and, if necessary, an assessment of the integrity and anticorruption mechanisms and tools implemented by the Third Parties.

For the purpose of application of this Policy to Third Parties, contracts signed by Suzano must contain specific clauses on compliance with Applicable Anticorruption Laws and the Company's standards of conduct.

#### **4.12 - COMMUNICATION CHANNELS**

In case of doubts about the interpretation of this Policy and/or guidance on situations that may occur in the daily routine, always consult the Compliance area.

**Email:** [compliance@suzano.com.br](mailto:compliance@suzano.com.br)

Also, note for that reported cases involving suspected **Corruption, Bribery, Acts against Public Administration** and any noncompliance with applicable laws, Suzano may report them to competent authorities, providing details of the process and measures taken, if necessary, besides collaborating with external investigations conducted by authorities.

If you are aware of any violation or suspected violation of this or any other Policy of Suzano, report it to the **Ombudsman** Channel through any of the following means, confidentially and, if you wish, anonymously:

- **Website:** [www.suzano.com.br](http://www.suzano.com.br) -> Ombudsman

Suzano will safeguard the confidentiality of information related to investigations on potential violations of the guidelines herein, and any reprisals for reporting actual or potential violations of this Policy are strictly forbidden.

#### **5- RESPONSIBILITIES**

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The Compliance area is the area of Suzano that has exclusive competence to change, in any hypothesis, this Policy. Any change to this Policy must be communicated by the Compliance area to the relevant interested parties.

## 6 – APPROVAL OF THE POLICY

To constantly improve the integrity mechanisms of the Company and the guidelines of this Policy, risk assessments are carried out periodically according to the characteristics of the business, places of operation and Laws Applicable to Suzano. In addition, the senior management verifies the effective implementation of such mechanisms and the initiatives to improve them.

This Policy comes into force on the date of its approval as per the approval powers defined by Suzano and will be revised **at least every two (2) years**.

The **Compliance area** has exclusive powers to amend, in any circumstance, this Policy. Any amendments to this Policy must be informed by the Compliance area to the relevant stakeholders.

## 7 - VIOLATION OF THE POLICY

Under no circumstances will a person covered by this Policy be allowed to claim no knowledge of it to justify any violation or noncompliance. Suzano will take the applicable measures in relation to violations of the rules established in this Policy and the legislation in force.

In addition to internal measures, any violation of the rules established in Applicable Anti-Corruption Laws and/or this Policy is subject to applicable sanctions and legal measures, in accordance with applicable laws and jurisdiction.



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**8 – MISCELLANEOUS**

Exceptions or situations not specifically addressed in this Policy will be analyzed individually by the Compliance area.

**9 – APPENDICES**

Not Applicable

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