

| | | | |
|-----------------------|--|------------------|---------------------|
| Issuing Area: | OMBUDSMAN | | |
| Scope: | SUZANO S/A | Code: | POL.00.00029 |
| Document Type: | POLICY | Revision: | 1 |
| Title: | POLICY ON DISCIPLINARY MEASURES | Date: | 10/16/2019 |

Summary

| | |
|--|---|
| 1 – OBJECTIVE | 2 |
| 2 - SCOPE | 2 |
| 3 - REFERENCE DOCUMENTS | 2 |
| 4.1. Disciplinary Measure | 2 |
| 4.2. Infraction..... | 2 |
| 4.3. Conduct | 2 |
| 4.4. Misconduct..... | 2 |
| 4.5. Principle of causality..... | 2 |
| 4.6. Principle of a current situation..... | 3 |
| 5 – GUIDELINES..... | 3 |
| 6 - RESPONSIBILITIES | 6 |
| 7 - ASSOCIATED BUSINESS RISKS | 6 |
| 8 – ATTACHMENTS | 6 |

| | | | |
|-----------------------|--|------------------|---------------------|
| Issuing Area: | OMBUDSMAN | | |
| Scope: | SUZANO S/A | Code: | POL.00.00029 |
| Document Type: | POLICY | Revision: | 1 |
| Title: | POLICY ON DISCIPLINARY MEASURES | Date: | 10/16/2019 |

1 – OBJECTIVE

To establish the guidelines and define the principles, concepts and criteria for applying disciplinary measures to Suzano S.A. employees.

2 - SCOPE

Applicable to all employees of Suzano S.A. and its subsidiaries and affiliated companies, in Brazil and abroad.

3 - REFERENCE DOCUMENTS

- Ombudsman Policy.
- Labor Regulation Laws (CLT)

4 – DEFINITIONS AND ABBREVIATIONS

For the purpose of applying this Policy, the following principles must be observed:

4.1. Disciplinary measure

The application of a warning, suspension or dismissal of an employee for just cause, due to conduct that breaches Internal Regulations, the Code of Ethics and/or other form of written or verbal guidance, provided that is in line with the law and good manners.

4.2. Infraction

Act of intentionally ignoring and disregarding the corporate guidelines related to breach or non-compliance with rules, internal standards, laws, regulations, code of conduct and social behavior.

4.3. Conduct

The way an individual behaves before the company and society in general, taking as baseline the laws, beliefs, cultures, moral and ethical values defined.

4.4. Misconduct

Characterized by the action or omission by a party in order to obtain undue advantage or benefit for him/herself or for third parties, with the aim of harming the other party.

4.5. Principle of causality

The relationship between cause and effect should be investigated thoroughly, to see if there is an actual relationship between the improper act by the employee and the consequences arising from that act.

| | | | |
|-----------------------|--|------------------|---------------------|
| Issuing Area: | OMBUDSMAN | | |
| Scope: | SUZANO S/A | Code: | POL.00.00029 |
| Document Type: | POLICY | Revision: | 1 |
| Title: | POLICY ON DISCIPLINARY MEASURES | Date: | 10/16/2019 |

4.6. Principle of a current situation

The penalty should be applied as soon as the managers become aware of the fact, and the interval between the event and application of the penalty should be as short as possible, notwithstanding the stages of becoming aware of the occurrence, determination of the facts and definition of the applicable disciplinary measure.

4.7. Principle of proportionality

The penalty to be applied should be proportional to the seriousness of the wrongful act.

4.8. Principle of not allowing duplicate punishment

A single disciplinary sanction should apply to each wrongful act, and two or more penalties are not allowed for the same act.

5 – GUIDELINES

Among others, the following occurrences are considered disciplinary offenses:

5.1. Misconduct

Offenses that contrast with customary social norms for personal conduct. For example: use of obscene words and gestures, wearing inappropriate clothing that could jeopardize health and safety, according to established rules.

5.2. Carelessness

Habitual non-fulfillment of basic obligations, such as: punctuality, attendance or dedication and attention to service. For example: frequent delays and/or unjustified absences, engaging in personal activities during working hours, frequent mistakes in work.

5.3. Lack of discipline

Failure to comply with the company's general standards. For example: leaving the workplace without prior communication to management, smoking in unauthorized areas, not wearing an identity badge or personal protective equipment (PPE) when such use is required and mandatory.

5.4. Poor Procedure

Stemming from an act that goes against ethical-moral customs. For example: coordination and/or comments harmful to the relationship between employees or between areas, omission of information relevant to the achievement of some result.

| | | | |
|-----------------------|--|------------------|---------------------|
| Issuing Area: | OMBUDSMAN | | |
| Scope: | SUZANO S/A | Code: | POL.00.00029 |
| Document Type: | POLICY | Revision: | 1 |
| Title: | POLICY ON DISCIPLINARY MEASURES | Date: | 10/16/2019 |

5.5. Habitual Trading

Practiced habitually without permission from the hierarchical superior and in detriment to the service. For example: sale of products, goods or services in the workplace.

5.6. Deviation of Conduct

Failure to comply with the company's standards, rules and Code of Conduct. Such measures may range from a verbal warning to dismissal for just cause with the opening of criminal and civil proceedings. Cases of deviation of conduct must be considered by the Ethics and Conduct area, with due investigation by the competent areas reporting to the Conduct Management Committee, provided for in the Ombudsman Policy.

5.7. Dishonest Act

An act performed by the employee, for his/her own benefit or that of third parties, which is detrimental to the company's assets. For example: appropriation of goods, diverting material owned by the company, purposeful misclassification regarding the quality/utility/specification of a product or material.

5.8. Criminal Conviction

Suspension or termination of the employment agreement. For example: involvement in a conviction by public, civilian or military entities, with detainment or imprisonment.

5.9. Breach of the company's secrets

Noncompliance with the obligation of loyalty to the company. As an example: revealing technology in use, revealing results of research and strategic plans, or even leaking undisclosed confidential information to the Capital Markets.

5.10. Job Abandonment

Unjustified absences above the legal limit of 30 consecutive days, without any notification to the company.

5.11. Physical Offenses

Attempted or actual bodily harm, except in legitimate self-defense or defense of others.

5.12. Lack of Technical Qualification

Loss or non-existence of qualification or requirements established by the company or provided for by law for exercise of the profession, as a result of the employee's misconduct.

| | | | |
|-----------------------|--|------------------|---------------------|
| Issuing Area: | OMBUDSMAN | | |
| Scope: | SUZANO S/A | Code: | POL.00.00029 |
| Document Type: | POLICY | Revision: | 1 |
| Title: | POLICY ON DISCIPLINARY MEASURES | Date: | 10/16/2019 |

5.13. Disciplinary Sanctions

As a result of the practice of any wrongful act, the employee will suffer the following penalties, which must always be applied taking into account the Principle of Proportionality, regardless of the sequence listed below:

5.13.1. Verbal Warning

Verbal notification to the employee from his/her respective management regarding the wrongful act.

5.13.2. Written Warning

Formal registration of the occurrence by means of a written warning, which must include the employee's awareness and which will be filed in his/her employment record in the Human Resources Department.

5.13.3. Suspension

Removal of the employee from his/her activities, without pay. This may vary from 1 (one) day to 29 (twenty-nine) days, which do not precede or follow weekends or days off.

5.13.4. Termination without just cause

Termination of the employment agreement due to the occurrence of a wrongful act or wrongful acts, but without characterizing just cause.

5.13.5. Termination with just cause

Termination of the employment agreement due to the occurrence of a wrongful act or wrongful acts characterizing just cause.

5.14. Investigation of the wrongful act and determination of the sanction

5.14.1. Any wrongful act, regardless of its classification or severity, must be immediately reported to the Unit's Human Resources department, which will take basic notes on the occurrence and gather historical data.

5.14.2. Based on this information, if applicable, the person responsible for the Unit's Human Resources department will inform the "Ethics and Ombudsman" Area, as defined in the Ombudsman Policy.

5.14.3. In a specific investigation, the responsible professionals will verify the occurrence and, according to the principles defined in this policy, will carry out an analysis and verification of the facts and establish the possible penalty for the employee in breach.

| | | | |
|-----------------------|--|------------------|---------------------|
| Issuing Area: | OMBUDSMAN | | |
| Scope: | SUZANO S/A | Code: | POL.00.00029 |
| Document Type: | POLICY | Revision: | 1 |
| Title: | POLICY ON DISCIPLINARY MEASURES | Date: | 10/16/2019 |

5.14.4. After the investigation, the conclusions and recommendation will be applied by the management with the full support from the Human Resources department, which will also be responsible for the functional registration of the occurrence and the respective penalty applied.

5.15. Ombudsman and Conduct Committee

The employee may also be subject to application one of the disciplinary measures provided for in this policy as a result of a matter brought to the attention of the company by the Ombudsman Channel and duly investigated pursuant to item 5.6 of this policy.

6 - RESPONSIBILITIES

The responsibilities are laid out under item "5 – Guidelines".

7 - ASSOCIATED BUSINESS RISKS

7.1. Strategic

7.1.1. Internal

- Communication failures

7.2 Compliance Risks

7.2.1 External

- Legal

7.2.2. Internal

- Non-compliance with standards and procedures

7.2.3. Authority

- Unclear leadership
- Inappropriate limits on authority

7.3 Operational Risks

7.3.1. Correctness / Ethics

- Unethical management

7.3.2. Human Resources

- Pressure from Unions

8 – ATTACHMENTS

Not applicable.