

<b>Título:</b>	<b>Disciplinary Measures Policy</b>		
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## 1 – PURPOSE

To establish guidelines and define 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 affiliates in Brazil and abroad.

## 3 – REFERENCE DOCUMENTS

- Ombudsman Policy.
- Consolidated Labor Laws (CLT)

## 4 – DEFINITIONS AND ABBREVIATIONS

For the purposes of implementing this Policy, the following principles shall be observed:

### **4.1. Disciplinary measure**

Application of a warning, suspension or dismissal with cause to the employee, due to a conduct that violates the Internal Regulation, the Code of Ethics and/or other written or verbal guidance, provided that it is in accordance with the law and good manners.

### **4.2. Infraction**

Intentionally ignoring and disregarding business guidelines for breach and non-compliance with rules, internal rules, laws, regulations, code of conduct and social behavior.

### **4.3. Conduct**

The way an individual behaves towards the Company and society at large, based on defined laws, beliefs, cultures, moral and ethical values.

#### **4.4. Willful misconduct**

The action or omission of a party with the intention of obtaining improper profit or own or third parties' benefit, with the purpose of harming the other party.

#### **4.5. Causality Principle**

The relationship between cause and effect shall be carefully verified, i.e., if there is an effective relationship between the wrongful act performed by the employee and the consequences arising from that act.

#### **4.6. Currentness principle**

The application of the penalty should occur as soon as the managers become aware of the fact, and the interval between the event and the application of the penalty should be as short as possible, without prejudice to the stages of knowledge of the occurrence, fact-finding and definition of the applicable disciplinary measure.

#### **4.7. Proportionality principle**

The penalty to be applied shall be commensurate with the seriousness of the wrongful act.

#### **4.8. Double punishment prohibition principle**

Each wrongful act shall correspond to a single disciplinary penalty, and two or more penalties for the same act will not be allowed.

## **5 – GUIDELINES**

Among others, the following occurrences are considered disciplinary offenses:

### **5.1. Conduct Incontinence**

Deficiencies that routinely contradict social rules of personal conduct. For example: use of obscene words and gestures, use of inappropriate clothing that may compromise health and

## **5.2. Carelessness**

Customary noncompliance with basic obligations, such as: punctuality, attendance or dedication and attention to service. For example: frequent delays and/or unjustified absences, performing private activities during working hours, frequent errors in the execution of work.

## **5.3. Indiscipline**

Failure to comply with the Company's general rules. For example: leaving the workplace without prior notice to management, smoking in prohibited locations, not carrying an ID badge or not wearing personal protective equipment (PPE) where its use is required and mandatory.

## **5.4. Misbehavior**

Arising from an act that is against ethical-moral manners. For example: articulations and/or comments detrimental to the relationship between employees or areas, omission of information relevant to the achievement of any result.

## **5.5. Common Negotiation**

Common practice without permission of the superior and with prejudice to the service. For example: selling products, goods, or services in the workplace.

## **5.6. Misconduct**

Failure to comply with standards, rules and the Company's Code of Conduct. Such measures may range from verbal warning to dismissal with cause upon opening of criminal and civil proceedings. The cases of misconduct shall be considered by the Ethics and Conduct area, with due investigation by the competent areas, reporting to the Conduct Management Committee, as provided for in the Ombudsman Policy.

## **5.7. Dishonesty Act**

Act practiced by the employee, for his own benefit or that of third parties, damaging the Company's assets. For example: appropriation of goods, misappropriation of Company-owned material, purposely misclassified as to product or material quality/utility/specification.

### **5.8. Criminal conviction**

Suspension or termination of employment agreement. For example: involvement with conviction by public, civil or military agencies, with imprisonment or incarceration.

### **5.9. Breach of Company's secret**

Failure to comply with the obligation of loyalty to the Company. For example: revealing technology in use, revealing research results and strategic plans, or leaking confidential information not disclosed to the Capital Markets.

### **5.10. Job Abandonment**

Unjustified absences above the legal limit of 30 consecutive days without any notice to the Company.

### **5.11. Physical Assault**

Attempted or consummate physical assault, except in self-defense or in defense of others.

### **5.12. Lack of technical qualification**

Loss or lack of qualification or requirements established by the Company or provided by law for the exercise of the profession, as a result of the employee's willful conduct.

### **5.13. Disciplinary Penalties**

As a result of a wrongful act, the employee will suffer the following penalties, which shall always be applied taking into consideration the Proportionality Principle, regardless of the following sequence:

### **5.13.1. Verbal Warning**

Verbal notice to the employee by his/her management regarding a wrongful act.

### **5.13.2. Written Warning**

Formal record of the incident by written warning stating the employee's knowledge and to be filed in his or her records in the Human Resources Area.

### **5.13.3. Suspension**

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

### **5.13.4. Dismissal without cause**

Termination of employment agreement due to the occurrence of wrongful act or wrongful acts, although without cause.

### **5.13.5. Dismissal with cause**

Termination of employment agreement due to the occurrence of wrongful act or wrongful acts, although with cause.

## **5.14. Verification of the wrongful act and determination of the penalty**

**5.14.1.** Any wrongful act, regardless of its classification or severity, shall be immediately reported to the Unit's Human Resources area, which will make basic notes about the occurrence and the collection of historical data.

**5.14.2.** From this information, if applicable, the head of the Unit's Human Resources area will communicate the "Ethics and Ombudsman" Area, as defined in the Ombudsman Policy.

**5.14.3.** In specific investigation, the responsible persons shall verify the occurrence and within the principles defined in this policy, shall analyze, verify the facts and establish any penalties to the employee performing such wrongful act.

**5.14.4.** After verification, the conclusions and recommendation shall be applied by its management with full support of the Human Resources area, which will also be responsible for the functional record of the occurrence and the respective penalty applied.

### **5.15. Ombudsman and Conduct Committee**

The employee may also be subject to the application of one of the disciplinary measures provided for in this policy due to a matter brought to the attention of the Company by the Ombudsman Channel and duly ascertained in item 5.6 hereof.

## **6 - RESPONSIBILITIES**

Responsibilities are included in 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

- Failure to comply with rules and procedures

#### 7.2.3. Authority

- Unclear leadership
- Inadequate authority limits

### **7.3 Operational Risks**

#### 7.3.1. Righteousness/ Ethics

- Unethical management

#### 7.3.2. Human Resources

- Trade Union Pressures

## 8 – ATTACHMENTS

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