



Code of Conduct





To all employees, business partners, and other stakeholders

Ethics is an integral part of CENIBRA's and its subsidiaries' essence. Since our founding, diligence and commitment to results, excellence and, above all, ethics and transparency have always been in focus. This is a key factor behind the sustainability of our businesses.

Our long journey included successive capacity expansions and many changes since the Company was established. What has not changed is our commitment to the strictest standards of quality, integrity, and compliance with legal and regulatory requirements in all countries in which we operate.

By preparing, revising, and disclosing this Code of Conduct, CENIBRA and its subsidiaries reaffirm their Principles and Values in all relationships and expect their directors, managers, employees, outsourced personnel, suppliers, and other stakeholders are equally committed.

Knowing and applying our Code of Conduct in our day-to-day life is of utmost importance to everyone. It demonstrates CENIBRA's way of doing business.

We are all in charge of building the Company we aim to create. Applying this Code in full is the way we will achieve ever higher moral standards and business excellence in a sustainable manner, aligned with best corporate governance practices. However, excellence is only achievable through a collaborative process among our colleagues, customers, suppliers, communities, and other stakeholders.

Preserving and strengthening CENIBRA's reputation and image is everyone's duty. Let's continue the history of our Company together!

The Executive Management

Belo Oriente, November 21, 2024

Approved at the Executive Management meeting RDC 1583





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CENIBRA's identity

A company's institutional identity is the combination of its purpose (reason for being), mission (why we are here), vision (what we want to be), and values and principles (what we believe in).

Aiming for a better understanding and application of this Code of Conduct, it is of fundamental importance that all employees be responsible for preserving CENIBRA's Identity as set out below.





Mission

Provide society with valuable products and solutions from sustainable forests.



Vision

Be an ever-changing company with a focus on sustainable practices.



Principles and Values

Diversity and inclusion: value diversity and be inclusive.

Ethics: be respectful, transparent, and truthful in all relationships.

People: genuine care for people, founded on respect for Human Rights.

Innovation: be innovative and committed to the continuous improvement of its value chain.

Excellence: strive for quality, safety, reliability, and competitiveness.

Care for the planet: consider natural resources, biodiversity, and society as key elements of business sustainability strategies.



Introduction

CENIBRA's Code of Conduct reflects its ethical principles and values. Building a company that is righteous and coherent with its identity requires attitudes that demonstrate a vision of corporate responsibility that goes far beyond combating corruption and complying with applicable legal and regulatory requirements.

Ethics is a set of principles, virtues, and values created to foster the good. It is the most advanced stage of development of human consciousness. Rules are derived from such conduct-guiding principles.

CENIBRA values the practice of ethical principles in its work and business relationships and the respect for and compliance with laws and regulations applicable to its business.

The Company's culture stems from the joint action of its employees' and business partners' behavior, through the practice of fundamental values.

In this context, we expect our employees, business partners, and other stakeholders take responsible attitudes and be committed to sustainable development and our Code of Conduct's values and pillars, as outlined below:

- Truth
- Transparency
- Justice
- Loyalty
- Appreciation

- Responsibility
- Integrity
- Cooperation
- Diversity
- Inclusion

- Solidarity
- Empathy
- Equity

CENIBRA's sustainable growth and continued existence rely on the preservation and promotion of its ethical principles. Our employees, business partners, and other stakeholders must be aware that misconduct, whether by action, omission, or complacency, can harm society, breach laws, and destroy the Company's image and reputation.

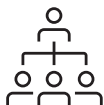
If you have questions on how to act and reading this Code does not provide the necessary clarification, please submit your questions for appreciation and evaluation by the Ethics Committee through the communication channels indicated in the end hereof.



Objectives

Our Code of Conduct was set out with the following objectives in mind:

- ✔ Be a formal and institutional benchmark to guide employees' and business partners' actions in terms of the coherence of their personal and professional conduct, both inside and outside the Company.
- ✔ Make clear and public what the Company understands by ethical conduct and assist in setting up conduct parameters.
- ✔ Enable ethical behavior based on fair, relevant values adopted by everyone.
- ✔ Reduce the subjectivity of personal interpretations of moral and ethical principles.



Application and compliance

This Code applies to all CENIBRA's and its subsidiaries' employees, regardless of position, job, and professional relationship arrangement, as well as business partners and other stakeholders who have direct or indirect relationships with us. Complying with ethical guidelines in every activity and relationship is absolutely everyone's duty.

Any employee or business partner that becomes aware of any practice that goes against this Code must report the fact to the Ombudsman Channel, which shall take the necessary measures to deal with the situation in line with specific regulations or provide guidance thereon.

Employees must sign the Statement of Commitment shown at end of this Code of Conduct to formalize their agreement to comply with the principles and guidelines set forth herein. Such signed Statement of Commitment is part of the Employment Contract and it must be formally renewed on a yearly basis.





Rules, laws, and regulations

CENIBRA values respect for and compliance with applicable rules, laws, and regulations in all its labor relationships, whether in Brazil or abroad, in particular Federal Act No. 12846 of August 1, 2013 (Anticorruption Act) and international laws on the prevention and combat of all forms of corruption and/or any type of fraud and other illicit or criminal acts. Failure to comply with anti-corruption and other applicable laws may result in severe legal penalties for the Company, in addition to criminal liability for the individual involved.

Securing or maintaining business relationships based on unethical situations under any circumstances, such as fraud, bribes, kickbacks, or other illegal payments, is not allowed, regardless of any local custom. Specific guidelines and practices on this matter are set out in Procedure “Fighting Bribery and Corruption”, which must also be known and followed.

Everyone must be committed to knowing and complying with laws and regulations applicable to CENIBRA’s activities, both nationally and internationally.

Access regulation and policy documents on the intranet or request a hardcopy from your immediate superior.



Workplace environment

Relationships in the workplace should be based on courtesy and dialogue, regardless of position or job, while fully respecting fundamental rights. No form of human right violation with respect to any person directly or indirectly involved in the Company's activities and businesses is allowed.

We expect all employees to behave with a proactive attitude and sense of ownership of the business, as well as enthusiasm in promoting CENIBRA's mission, vision, principles, and values.

The Company employs a diverse, inclusive workforce and recognizes that a combination of diverse backgrounds, skills, and experiences maximizes its capability of achieving goals and represents a sustainable competitive edge.

Transparency is another important principle that must always be incorporated into the work relations and environment. It implies acting constantly with objectivity, clarity, and openness.

Human Rights

Abuse of power, sexual or moral harassment, discrimination, prejudice, disqualification, intimidation, and embarrassment are unacceptable attitudes. At CENIBRA, valuing people is a fundamental principle.

We support and respect international standards such as the United Nations (UN) Universal Declaration of Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

The Company always endeavors to identify, prevent, minimize, resolve, and/or remedy negative effects on human rights caused or intensified by its business activities, as well as negative effects directly related to its commercial relationships. In this context, we must foster actions and behaviors that protect and respect fundamental rights in any work relationship, including:

☑ **Combat of involuntary, forced, slave, and child labor:**

The Company does not accept involuntary, forced, child, slave-like, or similar labor practices among its own personnel and those of its business partners. Workers have the right to choose their job, and any and all forms of constraint and/or coercion are intolerable, including those aimed at forcing workers to carry out activities under serious, imminent risk to life and involving exhausting working hours.

Should a minor be hired as an apprentice, the applicable laws in force in the country shall be complied with and the Company must make sure such apprenticeship will not prevent the minor from continuing his or her studies.

☑ **Promotion of diversity and inclusion, while ensuring equal, fair opportunities in a work environment free of harassment, bullying, prejudice, and discrimination:**

CENIBRA and its business partners must provide a work environment in which everyone is treated with dignity, equality, and respect, while ensuring a non-discriminatory, equitable coexistence and promoting diversity and equal opportunities for all applicants and employees, without any kind of prejudice or discrimination, including in the fields of hiring, compensation, and training.

Any and all measures that may humiliate, intimidate, and expose anyone in our work environment to ridicule, hostility, and embarrassment are prohibited, whether based on race, social status, nationality, religion, age, disability, gender, marital status, sexual orientation, health condition, pregnancy, union membership, political affiliation, or other aspects protected by law.

☑ **Promotion of decent and safe work conditions, including physical and emotional/psychological safety:**

CENIBRA and its business partners must promote a safe, healthy work environment for everyone, with utmost priority to safety in all processes, and make sure all employees can exercise their Right of Refusal to Work should any activity pose severe, imminent risk to their safety and health.

The Right of Refusal to Work also applies to the performance of noncompliant acts in disagreement with the internal Policies and Rules and applicable regulations and laws.

All employees must follow occupational health and safety rules and procedures and report situations that could place their physical or mental integrity at risk.

Leadership Behavior

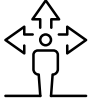
Leaders have the mission and duty of leading by example and committing themselves to rigorously complying with ethical principles. Leaders are also responsible for continuously fostering respect for CENIBRA's values and the provisions hereof, contributing to the betterment of internal practices and promoting a culture of integrity.

We expect all the leaders to act as true representatives and promoters of CENIBRA's institutional identity, working in a diligent, proactive, consistent, and sensible manner.

Accepting criticism, clarifying doubts, and eliminating personal and emotional preferences in decision-making are fundamental requirements for leadership. Furthermore, leaders must know and properly apply disciplinary and penalty mechanisms, as well as those of merit and recognition.







Conflicts of interest

Conflicts of interest may occur in any and all situations in which private interests or interests other than CENIBRA's inappropriately influence the value judgment, decision-making, and conduct of the Company's business. That is, any action or omission in which private interests prevail over those of the Company.

An actual or apparent conflict of interest may arise when an employee's personal, family, social, or political activities and relationships interfere or have the potential to interfere with his/her responsibilities and duties towards CENIBRA.

All employees should take a preventive approach and not expose themselves to potential situations of conflict of interest. Protecting their own image, integrity, and transparency is part of their role. Employees' activities outside the Company and their professional duties must be perfectly harmonized.

CENIBRA does not oppose its employees' participation in civic, religious, philosophical, political, labor, and social organizations, as long as it does not affect their responsibilities towards the Company and/or generates any conflict of interest, however potential.

Employees' right of getting involved in civic affairs and participating as citizens in political processes shall be respected. However, such participation should take place outside working hours and it must be made clear that employees' political positions are personal and not the Company's.



The following situations involving the Company employees characterize a conflict of interest and are forbidden:

- ⊗ Participating in persuasion campaigns of a political or any other nature and gathering and/or mobilizing colleagues at the Company's premises for unauthorized private purposes not provided for by law or in disagreement with CENIBRA's corporate interests.
- ⊗ Contributing money, goods, or services to campaigns or political causes on behalf of CENIBRA.
- ⊗ Taking advantage of the position in the Company to secure personal advantages now or in the future and influencing decisions that may favor their own, customers', suppliers', or third parties' interests to the detriment of the Company's interests or affect its profit.
- ⊗ Carrying out external activities during working hours, such as providing consultancy services or holding a position in organizations that have conflicting interests and do or wish to do business with CENIBRA.
- ⊗ Carrying out internal or external recruitment or promotion of employees that are ancestors (parents and grandparents), descendants (children and grandchildren), or collateral relatives (spouse, siblings, uncles, aunts, nephews, and nieces) in functions in which a direct subordination between relatives may exist.
- ⊗ Selling products of any kind in the Company.

Without prejudice of the provisions set forth in this Item and subject to criteria set out in Procedure DIR-43/18 Forestation Incentive Program and Wood Procurement, any employee or his/her dependents may carry out activities under the Forestation Incentive Program whose purpose is to create a new alternative for supplying part of the industrial plant's demand for wood.





Corporate resources and intellectual property

Corporate resources refer to tangible or intangible assets belonging to the Company, such as: facilities, vehicles, equipment, values, brands, patents, machinery, technologies, concepts, methods, know-how, office materials, furniture, marketing strategies business, research, systems, and inventions.

All corporate resources and intellectual property must be treated and used with care and for the purposes for which they are intended in the Company. In case of their use for other purposes, if applicable, discernment and prior and formal authorization is required from the person responsible for the resource.





Records and confidential/insider information

Information related to the Company's business is also considered a valuable asset and, as such, must be protected and treated confidentially, as applicable. Company affairs must be conducted with discretion by employees and business partners. The data and information recording must be accurate and truthful.

Any unauthorized disclosure of CENIBRA's confidential information, whether intentional or not, must be promptly reported to the employee's immediate superior or through the communication channels indicated at the end of this Code. Should any employee hold or know any improper information, he or she should report to the corresponding area or person responsible for such information.

The dissemination of rumors and provision and spreading of fake information or misinformation, as well as the engagement in dealings with other companies based on insider information or taking actions that may lead to suspicions of insider information, are inadmissible.

Any CENIBRA information or document may only be used or disclosed by any means, including through the press, by an authorized employee, bearing in mind that in-company proprietary data require confidential treatment and shall be restricted to the respective areas involved. Detailed guidelines on this matter are provided in the "Corporate Communication Manual", which must be known and complied with by everyone.

Any information stored in databases should only be accessed by authorized persons. Any access to and/or treatment of personal data must be made in compliance with the "Personal Data Protection and Privacy Policy" and Procedure DIR-51/21 "Personal Data Management and Treatment".

Dependable, accurate recording of data and information is critical to reliable accounting reports, suitable decision-making, and proper compliance with laws, regulations, and CENIBRA's internal guidelines.





Image and social media

In order to protect and strengthen CENIBRA's image, the actions of its employees when performing their jobs inside and outside the Company must be permanently aligned with and based on its principles and values.

As a CENIBRA's employee, you represent the Company and, in this sense, we expect you will permanently contribute to building the Company's image and our brand's reputation.

The publication of Company documents and proprietary information on social media or any other external means of communication is prohibited. CENIBRA's official publications in social media are the responsibility of the Corporate Communication department and, in the case of other means of communication, they may also be made by duly authorized areas that may occasionally need to publish. Furthermore, respect for the Company's values and image must always be taken into account when sharing workplace photos or videos, operating details such as equipment or accidents, while bearing in mind information security and confidentiality, including personal data and corporate image.

Publishing any content about CENIBRA on any social media platforms without prior authorization by and guidance from your superior or the Corporate Communication area is also prohibited, except if the publication is inherent to your job or if it has been prepared and disclosed officially by the Corporate Communications area.

When publishing any content on your own social networks, you must make it clear you are not speaking on behalf of the Company.

We also recommend and expect that all employees always act with discretion and exercise the appropriate critical sense when using social media, while interacting and positioning themselves in a legal and respectful manner.

Detailed guidelines on this matter are set out in the Company's "Corporate Communication Manual".



Risk management and information security

Aiming at ensuring continuation of its business, CENIBRA monitors and defines control measures relative to risks that may threaten the Company's activities and people's lives. It adopts information management risk and security practices based on the guidelines of Procedure DIR-34/15 "Corporate Risk Management" and other regulations referred to in that Procedure.

Information received and generated at the Company is an asset that requires special protection and every user is responsible for complying with the guidelines set out in the Telecommunication and Information Technology Policy.





Relationship with customers and suppliers

All customers must be treated with courtesy and efficiency and provided with accurate, clear, transparent information. Agreements with customers must always be respected, while seeking to continuously improve the product and service quality in line with the latest market trends, identifying and implementing technological improvements, and adopting appropriate procedures and standards. Customer complaints should be recorded in the Integrated Management System and dealt with according to specific internal procedures.

Similarly, the selection of suppliers and service providers should be guided by a spirit of partnership and based on clear, straightforward engagement processes, favoring the business partner's ethics and technical skills, and considering strictly professional criteria as set out in specific internal procedures and regulation.

Negotiations with suppliers and customers must be based on honesty and fairness, with a focus on the Company's interests.

Service measurements and payments to suppliers in disagreement with agreed contractual conditions are inadmissible and characterize negligence by the employee in fulfilling his or her obligations as provided for in the corresponding employment agreement.

International trade treaties, laws, and regulations, as well as rules applicable to raw material procurement and import and export transactions, must be duly complied with.

Except for promotional gifts, the receipt or granting of gifts, payments, favors, services, special considerations, discounts, and entertainment, among other items directly or indirectly offered to employees or third parties, shall only be allowed if they are in line with the guidelines set forth in Procedure "Fighting Bribery and Corruption".



Relationship with shareholders/partners

The relationship between employees and shareholders/partners must be egalitarian, without privileges, respecting applicable statutory and legal instruments, and always based on transparency and commitment, with an aim to constantly enhance the Company's competitiveness and profitability.

The Company management shall be based on transparency, disclosing its corporate information regarding economic, social, governance, and environmental issues in time through suitable channels and by appropriate officers.



Relationship with competitors

Competition and competitiveness must be based on respect, ethical values, and the principle of loyalty, which shall always govern the relationship between competing companies.

Current competition protection regulations must be fully met. Formation of monopolies and cartels, unfair commercial practices, bid frauds, and corporate espionage are inadmissible.

Procedure DIR-39/16 "Compliance by Visitors" shall apply when competitors are visiting CENIBRA.



Relationship with communities

CENIBRA shall prioritize respect and appreciation in its relationship with communities in areas in which it operates. It shall establish partnerships focused on improving the community's quality of life, while seeking to develop and preserve the local culture and minimize impacts from its activities.

Benefit grants to and partnerships with communities in areas in which the Company operates shall comply with the guidelines set forth in Procedure DIR-23/11 "Donations, Contributions, Sponsorships, and Others".





Relationship with public and private organizations

The Company shall continually seek to maintain a good, healthy, transparent, and arms-length relationship with public agencies, their officials and officials' family members, regardless of the agency and/or position involved, and also with private entities, whether in Brazil or elsewhere. In this sense, it is strictly prohibited to:

- ✔ Satisfy private or personal interests to the detriment of the common good or contribute to misappropriation of public resources, harming the parties' interests in general and putting the Company's reputation at risk.
- ✔ Receive bribes from or paid to any person with an aim to circumvent irregularities that may have been committed by the Company.
- ✔ Entice authorities, public officials, or third parties authorized to perform public services by offering and/or providing gifts or undue advantages whether to facilitate and defraud business, comply with their inherent legal obligations, or speed up routine steps.
- ✔ Offer or receive, directly or indirectly, illegal contributions sponsorships, or donations, commissions, or benefits to governmental or non-governmental authorities with an aim to influence decisions or obtain advantages.
- ✔ Perform any acts deemed harmful to the Brazilian or foreign public administration.

In order to comply with the guidelines set forth in this Item, it is necessary to be familiar with and meet the criteria set out in Regulation DIR-57/22 "Relationship with Public Officials" in the context of relationships with public agencies and their officials.



Environment and society

The Company contributes to environmental preservation and develops environmental awareness in line with applicable legal provisions.

Understanding the importance of such matters, the Company, through its values and commitments, seeks to promote innovation and development of materials, products, and services to the benefit of society and communities within its area of operation. In this respect, it operates based on the sustainable growth concept and in line with applicable certification principles and requirements.





Duties and responsibilities

Director, Manager, Advisor, Coordinator, Facilitator, and Supervisor should:

- ✔ Be a benchmark in terms of ethical conduct.
- ✔ Disseminate, guide, and ensure that the content of the Code of Conduct is understood and followed by employees.
- ✔ Take over the CENIBRA organizational units' official positions both inside and outside the Company.
- ✔ Express personal positions that are different or contrary to Company decisions only in the appropriate circumstances.
- ✔ Report any violation of the Code of Conduct to the Ethics Committee's coordinator.
- ✔ Apply penalties recommended by the Ethics Committee upon approval by the person in charge of the area (holding at least a position as manager/ advisor). In case of disagreement with respect to the Committee's recommendation, such person must present a formal, well-founded justification for deliberation by Executive Management.

All Employees should:

- ✔ Understand and adopt a righteous conduct consistent with the values and principles set forth in the Code of Conduct.
- ✔ Honestly acknowledge any mistakes that may have been made and immediately report to the manager or coordinator in charge.
- ✔ Report any illegal, doubtful, or unethical conduct they become aware of to the immediate manager/advisor of the respective area and/or through the Communication Channels (Ombudsman Service), in which case omission of facts, participation, or collusion are inadmissible.

- ☑ Evaluate any doubtful ethical issues in conjunction with his or her immediate manager, advisor, or coordinator and the Ethics Committee or the Legal Department.

Ethics Committee

The Code of Conduct and the Ethics Committee were set up by the Executive Management's Decision DIR-16/03 in 2003 with the purpose of monitoring, treating, evaluating, and recommending penalties in connection with complaints and events related to ethical issues submitted to it. The committee must have independence and autonomy. It must be made up of 9 (nine) full members with different skills, and complementary experiences and abilities, as follows:

- ☑ Two members from the Legal Area:
 - Committee Coordinator (Legal Advisor).
 - Committee Secretary (Legal Analyst).
- ☑ Three members from the Technical, Industrial, and Forestry Board, holding at least the position of Coordinator:
 - Forestry Department.
 - Forest Research, Control and Planning Department or Harvesting Department, with alternating representatives to be appointed every two years.
 - Manufacturing Department or Technical and Maintenance Department, with alternating representatives to be appointed every two years.
- ☑ One member from the Human Resources area, holding at least the position of coordinator.
- ☑ One member from the Sustainability area, holding at least the position of coordinator.
- ☑ One member from the CENIBRA Logística, holding at least the position of manager, to be appointed every two years.
- ☑ One member representing the employee involved in the event, holding at least the position of manager or advisor.

The Ethics Committee has the following main duties:

- ✔ Analyze and deal with the reported events in accordance with the Code of Conduct and other related instruments, covering occurrences involving employees of CENIBRA, its subsidiaries, and entities belonging to the Group.
- ✔ Recommend the appropriate penalties as provided for in the Code of Conduct while ensuring equality in sanction application.
- ✔ Recommend the filing and conduct of lawsuits, as applicable.
- ✔ Take measures aimed at raising the level of internal and external trust and Company's image and reputation.
- ✔ Protect the Company's physical and intellectual assets.
- ✔ Manage possible conflicts of interest that may be identified.
- ✔ Identify and recommend process improvements to minimize possible risks.
- ✔ Submit to the Executive Management an annual statistical report of events and penalties applied during the period relative to CENIBRA, its subsidiaries, and entities belonging to the Group.

The Legal Department should:

- ✔ Coordinate, along with the Corporate Governance area, the preparation, revision, and dissemination of the Code of Conduct.
- ✔ Make sure that all reported information is treated with confidentiality.
- ✔ Issue an opinion on violations of the Code of Conduct.
- ✔ Refer to the Ethics Committee any occurrence whose treatment is not defined in a procedure.
- ✔ File civil or criminal proceedings as recommended by the Ethics Committee, subject to previous approval as provided for in Procedure DIR-29/14 "Competencies between CENIBRA and Shareholders".

Internal Auditing

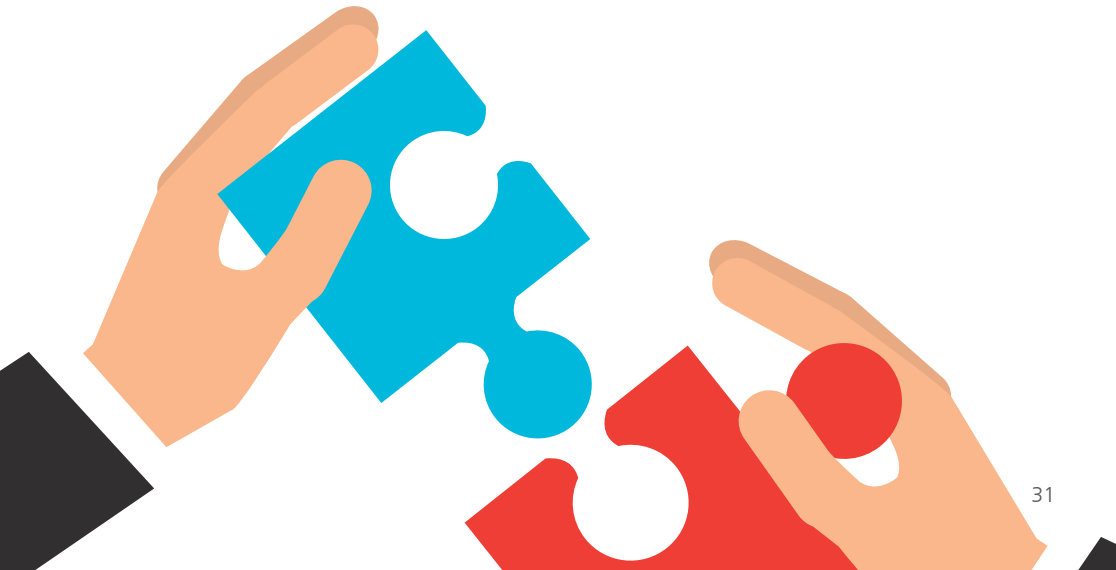
- ✔ Carry out investigations on suspected fraud and provide support to the Ethics Committee's requests in cases of noncompliance, in accordance with Procedure DIR-38/15 "Whistleblowing Management".

Human Resources Department

- ✔ Issue and record the penalty applied in line with the Ethics Committee's recommendation and formal approval by the person in charge of the area (holding at least a position as manager/advisor), and approval by Executive Management, if applicable.
- ✔ Make adequate resources available to the Ethics Committee so that it can give the necessary training.
- ✔ Support the Ethics Committee in the review of incidents involving labor issues.

Executive Management

- ✔ Approve the preparation, revisions, and disclosure of the Code of Conduct.





Training

The Development and Diversity area, along with the area responsible for the Code of Conduct, is in charge of providing employees with training courses with an aim to consolidate the understanding of the Code of Conduct's main guidelines and reinforce the need for adopting ethical attitudes in line with current internal and external standards.



Managing the consequences

Breaches to or deviations from the guidelines set forth in this Code of Conduct are subject to the application of disciplinary measures or penalties to be defined and recommended by CENIBRA's Ethics Committee.

To ensure proportionality and coherence when applying disciplinary measures or penalties to any specific case, the Ethics Committee must take as a basis the deviation type and severity/characteristic and its impacts and risks, including reputational risk as perceived by CENIBRA and the breaching party's intention and recidivism. Details are given in the following table:

Category	Noncompliant Actions and Impacts	Penalty/Measure
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Minor	<ul style="list-style-type: none"> Occasional and involuntary actions and/or omissions, which, despite not complying with policies, rules, internal procedures, and applicable law or regulations in force, did not cause damage or generated only minimal loss or even caused damage that was totally remediable. No recurrence within the "Minor" category. 	<ul style="list-style-type: none"> Verbal warning; Written warning; Consider the need for a refresher training.
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Moderate	<ul style="list-style-type: none"> Actions or omissions that, although involuntary, have caused partially remediable damage, without impact on health, life, environment, or the company's reputation and have not characterized culpable criminal activity. No recurrence in the "Moderate" category or with recurrence in the "Minor" category. 	<ul style="list-style-type: none"> 1 - to 5-day suspension; and Consider the need for a refresher training.
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Serious	<ul style="list-style-type: none"> Actions or omissions that, although involuntary, have caused recurrent and/or nonrecoverable damage, even if indemnifiable, with no impact on life. Recurring "Moderate" category conduct. Conduct that characterizes culpable criminal activity (without intent). 	<ul style="list-style-type: none"> Dismissal; Suspension of payable variable compensation, should the employee be entitled to such benefit.
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Extremely Serious	<ul style="list-style-type: none"> Extremely serious conduct with an impact on life. Conduct that characterizes intentional criminal activity (with intent). 	<ul style="list-style-type: none"> Dismissal or fair dismissal; and Possible civil or criminal lawsuit.
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Communication channels for criticism, suggestions, and whistleblowing

CENIBRA will accept criticism, suggestions, and complaints as reported through the following channels:

Through the “Ombudsman” and “Talk to Us” service channels available on CENIBRA website.

By telephone, through the number 0800 283 5199.

Through the emails etica@cenibra.com.br and denuncia@cenibra.com.br.

By letter addressed to the Ombudsman Service.

Personally, through the Ombudsman Service.





Guarantees to whistleblowers

CENIBRA continuously seeks to establish an environment of trust between the parties and provides its employees and business partners with full support to question and report incidents involving unethical issues, allegations of misconduct, or signs of inappropriate behavior. In this respect, it is important to promptly report any identified events or suspicions of breach of law, regulation, or rule to the competent channels.

CENIBRA adopts the following assumptions in any investigation of trustful, responsible reporting with an aim to ensure proper protection to good-faith whistleblowers, even if the event is not finally deemed a proven deviation once the investigation is completed:

- ✔ The completeness, confidentiality, and secrecy of the report and investigation are key factors.
- ✔ The whistleblower's anonymity must be ensured, if he or she so wishes.
- ✔ The investigation is conducted under entirely impartial and arms-length conditions.
- ✔ Disciplinary sanctions shall be applied against any attempt to retaliate.
- ✔ Complaints or accusations without consistent grounds shall be disregarded.

Denunciations or accusations in bad faith with the intention of harming people will result in penalties to the whistleblower.

Reports and whistleblowing by employees, customers, suppliers, service providers, and other stakeholders through the "Talk to Us" channel shall be received and dealt with in accordance with the guidelines and competencies defined in Procedure DIR-38/15 "Whistleblowing Management".



Cessation of irregularities

When signing contracts, establishing partnerships, making donations, and promoting sponsorships, among other processes considered to be of greater risk to the Company, standard contractual clauses on the following aspects should be considered:

- ☑ Employees, suppliers, service providers, business partners, and other intermediary collaborators must refrain from the practice of illicit acts.
- ☑ The need to adopt practices aimed at preventing and combating corruption.
- ☑ Possibility of suspending or interrupting a service, supply, or partnership.
- ☑ Possibility of contract termination.
- ☑ Possibility of applying.

In case of intentional violations of the Code of Conduct, Policies, Rules, Internal Procedures, and any applicable law or regulation in force, identified through complaints, compliance reports, internal or external audits, and monitoring actions, CENIBRA shall conduct appropriate investigations and make sure such irregularities or infractions cease immediately.

Once a violation is identified, appropriate corrective measures must be taken to ensure activities return to be carried out under normal conditions, repair possible damage that may have occurred in a timely manner, and apply appropriate penalties/disciplinary measures regardless of the employee's position and seniority in the Company and signed contracts or partnership agreements.



Reporting to competent authorities

Events submitted to the Ethics Committee for evaluation and recommendation or grievances reported through the Ombudsman Communication Channel and treated in accordance with the guidelines and competencies defined in Procedure DIR-38/15 “Whistleblowing management” must be analyzed from the standpoint of possible reporting of investigation findings to competent public authorities, provided:

- ✓ The occurrence of fraud, administrative misconduct, corruption, and bribery, among other crimes of a serious or very serious nature has been identified.
- ✓ There is sufficiently valid evidence confirming the occurrence of unlawful acts.
- ✓ There are integrity and reputational risks to CENIBRA.

In such cases, the reporting and submission to the competent authorities must be considered and defined by the Legal area based on the Ethics Committee's recommendations, and evaluated and finally and formally decided by Executive Management.



Unforeseen situations

Situations not provided for in this Code of Conduct shall be submitted to the Ethics Committee, which is responsible for judging and recommending appropriate actions and penalties.



General provisions

This consolidated Code of Conduct applies to CENIBRA and CENIBRA Logística.

CENIBRA's Code of Conduct was created on July 18, 2003, and CENIBRA Logística's on April 8, 2005. This document is deemed the zero version due to the new configuration of the Company's normative hierarchy implemented in 2024.

It must be reviewed periodically (at least once every three years) or on demand.



Nature of Changes

This Code of Conduct complies with the requirements of the Company's normative hierarchy implemented in 2024.



Statement of Commitment

I hereby declare that I have received and read CENIBRA's Code of Conduct, and understood the principles of ethical conduct and integrity governing labor relations. As an employee, I agree to carry out my activities in line with such principles and other internal guidelines.

I also agree to comply with the applicable legislation and refrain from practicing any corruption and unlawful acts.

In the event of suspicion, identification of violation, or conflict with the Company's interests and values, I also agree to report the fact through the available communication channels.

Place and date

Signature

Full name

Individual Taxpayers' Registry Number (CPF)

CENIBRA CNBLog Business partner: _____





Notes

A series of horizontal dotted lines for writing notes, spanning the width of the page.





0800 283 1291

In case of forest fires

31 97354-3333


WhatsApp


0800 283 3829


Other information


0800 283 5199


Ombudsman

 www.cenibra.com.br

 www.facebook.com/cenibra

 www.instagram.com/cenibra_celulose

 www.linkedin.com/company/cenibra-celulose

 www.youtube.com/c/CENIBRACelulose



**TALK TO
CENIBRA**