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Issuing area:	Compliance	Approval:	Dec 16, 2025

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1 – OBJECTIVE

This Policy establishes guidelines and criteria for combating acts of corruption and bribery against national and foreign public administrations, as well as against private entities, their employees, administrators, representatives, or related third parties.

1.1 – Scope

This Policy applies to Suzano, its subsidiaries, affiliates, advisors, directors, managers, shareholders, administrators, representatives, employees, and outsourced employees, regardless of their position or function, as well as any third parties who represent Suzano in any way, in Brazil or abroad, always respecting the articles of incorporation and applicable jurisdiction.

2 – REFERENCE DOCUMENTS

External references:

- BACEN Circular No. 3,978/2020);
- Brazilian Penal Code (Decree-Law No. 2,848/1940);
- Anti-Corruption Convention of the Organization for Economic Cooperation and Development (OECD);
- Brazilian Anti-Corruption Law (Law No. 12,846/2013) and Regulatory Decree (Decree No. 11,129/2022);
- Money Laundering Law (Law No. 9,613/1998);
- *US Foreign Corrupt Practices Act*;
- *UK Bribery Act*; and
- COAF Resolution No. 40/2021.

Internal references:

- Code of Ethics and Conduct;
- Supplier Code of Conduct;
- Gifts, Entertainment, and Hospitality Policy;

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- Conflict of Interest Policy;
- Social and Environmental Investment and Donations Policy;
- Disciplinary Measures Policy; and
- Manual on Relations with Public Officials.

3 – TERMS, DEFINITIONS AND ABBREVIATIONS

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

Public Official: (i) any individual who, by virtue of election, appointment, designation, hiring, or any other form of investiture or connection, holds a mandate, position, job, or function in a legal entity that is part of the Public Administration, directly or indirectly, at all levels; (ii) any official, authority, or employee of a political party; (iii) any candidate for public office; and (iv) former public officials who have not completed the period of leave required in the sector in which they worked when they were civil servants or public employees.

¹**Public Administration:** any agency, department, or entity of the Public Administration, whether direct or indirect, of any of the branches of the Federal Government, the States, the Federal District, and the Municipalities, public companies and mixed-capital companies, as well as any legal entity incorporated into the public patrimony, in addition to agencies, state entities, or diplomatic representations of foreign countries, or any legal entity controlled, directly or indirectly, by the public authorities of foreign countries or international public organizations.

Harmful Act to Public Administration: for the purposes of this Policy, it has the meaning attributed to it by Article 5 of Law No. 12,846/2013 (Brazilian Anti-Corruption Law).

Promotional items: items that **have no commercial value**, distributed by entities of any nature as souvenirs, advertising, routine publicity, or on the occasion of events or commemorative dates.

¹ Except for public companies incorporated under the laws of the People's Republic of China.

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

Corruption: (i) giving or receiving, promising or offering, directly or indirectly, money or undue advantage to national or foreign public officials (e.g., obtaining, retaining or directing business, guaranteeing, facilitating or accelerating the performance of services); (ii) financing, in any way, the practice of illegal acts harmful to the Public Administration, directly or indirectly; (iii) using an intermediary individual or legal entity to conceal or disguise their interests or the identity of the beneficiaries of illegal acts; (iv) manipulating, frustrating, impeding, defrauding, or obtaining undue advantage in bids and contracts with the public administration; and (v) hindering the investigation or inspection of public agencies or agents, or hindering or interfering with their activities.

Private corruption: acts of giving or receiving, promising or offering, directly or indirectly, money or undue advantage to persons who are part of private entities, such as their employees, administrators, or representatives, but also to their related third parties.

Due Diligence or Background Check: also called preliminary diligence, this is an organized and extensive investigation carried out to identify potential risk alerts linked to the formalization of any type of relationship.

Entertainment: tickets to shows, plays, sporting events, invitations to events, among others.

Fraud: means obtaining, for oneself or for others, an illicit advantage, to the detriment of others, by inducing or maintaining someone in error, through artifice, trickery, or any other fraudulent means.

Hospitality: expenses related to goods and services related to transportation – which may be land, air, road, or waterway – travel, accommodation, food, invitations to seminars, lectures, conferences, meetings, workshops, among other events associated with Suzano's activities or its segment of operation.

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Money Laundering: the act of concealing or disguising the nature, origin, location, disposition, movement, or ownership of assets, rights, or values derived, directly or indirectly, from illegal acts or conduct classified as a crime.

Applicable Anti-Corruption Laws: means all national and international anti-corruption laws and regulations in force in all locations where Suzano operates, including, but not limited to, the Brazilian Anti-Corruption Law (Law No. 12,846/2013), the Brazilian Penal Code (Decree-Law No. 2,848/1940), the United States Foreign *Corrupt Practices Act*, and the United Kingdom Bribery Act.

Facilitation Payments: means the payment of any amount or the granting of an Undue Advantage to Public Officials for the purpose of securing, facilitating, or expediting the performance of a routine act or service (e.g., processing documents, issuing visas, licenses, or permits).

²Politically Exposed Person (PEP): a person who, in the last five (5) years, has held or holds a prominent public office or has held or holds a senior position in the public administration.

2 Art. 1 Persons subject to supervision by the Financial Activities Control Council - Coaf pursuant to Articles 9 and 14, § 1, of Law No. 9,613, of March 3, 1998, shall adopt the measures provided for in this Resolution for the monitoring of transactions or proposed transactions involving politically exposed persons.

§ 1 For the purposes of this Resolution, politically exposed persons are considered to be:

I - holders of elective office in the Executive and Legislative Branches of the Federal Government;

II - those holding positions in the Executive Branch of the Union as: a) Minister of State or equivalent; b) Special Nature or equivalent; c) President, Vice President, and Director, or equivalents, of indirect public administration entities; and d) Senior Management and Advisory - DAS level 6 or equivalent; III - members of the National Council of Justice, the Federal Supreme Court, the Superior Courts, the Federal Regional Courts, the Regional Labor Courts, the Regional Electoral Courts, the Superior Council of Labor Justice, and the Federal Justice Council; IV - members of the National Council of the Public Prosecutor's Office, the Attorney General, the Deputy Attorney General, the Attorney General for Labor, the Attorney General for Military Justice, the Deputy Attorneys General, and the Attorneys General of the States and the Federal District;

V - members of the Federal Court of Accounts, the Attorney General and Deputy Attorneys General of the Public Prosecutor's Office attached to the Federal Court of Accounts;

VI - the national presidents and treasurers, or equivalents, of political parties; VII - the governors and secretaries of state and of the Federal District, state and district deputies, presidents, or equivalents, of state and district indirect public administration entities, and presidents of courts of justice, military courts, courts of auditors, or equivalents of the states and the Federal District; VIII - Mayors, Councilors, Municipal Secretaries, Presidents, or equivalents, of municipal indirect public administration entities and Presidents of Municipal Courts of Accounts or equivalents.

§ 2 For the purposes of this Resolution, politically exposed persons are also considered to be those who, abroad, are: I - heads of state or government; II - senior politicians; III - holders of senior government positions; IV - general officers and senior members of the judiciary;

V - senior executives of public companies; VI - leaders of political parties.

§ 3 For the purposes of this Resolution, senior leaders of public or private international law entities are also considered politically exposed persons.

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Gifts: items **of commercial value** that are not considered Freebies or Hospitality and are not promotional in nature, such as products, equipment, services, and discounts for events.

Bribery: means the act of offering, giving, soliciting, or receiving money, gifts, or other advantages, directly or indirectly, as a means of inducing the practice of any action, omission, undue influence or advantage, or dishonest, illegal act, or breach of trust in the performance of one's duties. The offering of anything, including favors, jobs, internships, conveniences, donations, or favorable opportunities provided directly or indirectly to persons who may unduly benefit Suzano's business, may be considered a form of bribery. This definition includes any promises that are not fulfilled.

Third parties: individuals or legal entities that act on behalf of, in the interest of, or for the benefit of Suzano, including those that have business relationships with the Company (e.g., customers, suppliers, service providers , etc.). Third-Party Intermediaries or “TPIs” are individuals or companies that act as Suzano’s agents, on its behalf or in its representation, before local or foreign Public Officials (e.g.: agents, consultants, commercial representatives, lawyers, brokers, among others).

Undue 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 omission by a particular person, whether a Public Official or not. This item may include gifts, promotional items, hospitality, and entertainment, as well as donations or sponsorships that are intended to unduly influence someone.

4 - GUIDELINES

4.1 – Prevention of Corruption and Bribery

Suzano declares that it has **zero tolerance for corruption** and that it acts in accordance with Applicable Anti-Corruption Laws, especially, but not limited to, the Brazilian Anti-Corruption Law (Law No. 12,846/2013) and its regulatory decree (Decree No. 11,129/2022), the United States *Foreign Corrupt Practices Act*, and the United Kingdom *Bribery Act*, always observing the most restrictive legislation and standards in each jurisdiction in which it operates.

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Therefore, the audiences covered by this Policy **are not authorized** to take any action that constitutes an act of **Corruption** and **Bribery, Private Corruption, Harmful Act to Public Administration**, or illegal act in their relationship with Public Officials, Public Administration entities, or private entities.

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

4.2 – Interactions with Public Administration and Public Officials

Interactions with Public Administration entities and Public Officials are fundamental to the execution and development of Suzano's business, but must be carried out by its Employees and Third Parties in an honest and transparent manner, respecting the procedures and rules applicable to the respective interactions, such as the guidelines of this Policy and the Manual for Relations with Public Officials.

Interactions may occur for a variety of reasons. These interactions may be operational (without relevant decision-making by employees or third parties) or strategic (when they involve decision-making and influence).

All types of interaction require attention, specific care, and compliance with the **Manual for Relations with Public Officials**. For detailed guidance on the guidelines, consult the **Manual**.

4.3 - Gifts, Promotional Items, Entertainment, and Hospitality

Suzano understands that offering and receiving Gifts, Promotional Items, Entertainment, and Hospitality are relevant to business and accepted in various cultures, but they can also be considered a form of Corruption and Bribery and Harmful Acts to Public Administration, especially if directed to/received from Public Officials.

No act of offering or receiving Gifts, Promotional Items, Entertainment, and Hospitality should be intended to influence decision-making, obtain any Undue Advantage, or cause embarrassment and exposure to the Company, its Employees, Public Officials, and Third Parties.

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For further guidance, please refer to the **Policy on Gifts, Entertainment, and Hospitality**.

4.4 - Political Contributions

Any type of support, contribution, donation, sponsorship, or contribution on behalf of Suzano to institutions, parties, and/or candidates associated with the political scene and with political-partisan characteristics in any location where it operates is **strictly prohibited**.

Suzano respects its Employees' participation in political activities, provided that they are always of a personal nature, outside working hours and the workplace, and do not appear to be any initiative on behalf of Suzano.

For more information, see the **Manual on Relations with Public Officials**.

4.5 – Donations and Sponsorships

Cooperation, donations, socio-environmental investments, and sponsorships must be carried out with impartiality, transparency, and in accordance with the eligibility criteria established in **the Socio-Environmental Investment and Donations Policy**.

To ensure compliance with this Policy, cooperation agreements, donations, socio-environmental investments, and sponsorships must comply with applicable legislation and its procedural ramifications and must undergo all stages of Suzano's internal evaluation (e.g., evaluation of demands by the corresponding committees and inclusion in the stakeholder system, among others).

All requests for donations, sponsorships, investments social-environmental, and cooperation must be preceded by a counterparty check, to be conducted by the Compliance Area, upon request.

Initiatives that: (i) create the expectation of an exchange of favors or undue advantage; (ii) characterize a conflict of interest; or (iii) damage Suzano's reputation are **strictly prohibited**.

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4.6 - Mergers and Acquisitions

Suzano shall ensure that corporate Mergers and Acquisitions are preceded by a robust, impartial, and unbiased assessment aimed at identifying possible acts that may result in the succession of any liability subject to Applicable Anti-Corruption Laws.

Once any transaction is completed, Suzano shall conduct a thorough assessment of compliance with the Applicable Anti-Corruption Laws, and all necessary measures shall be implemented immediately to ensure compliance.

4.7 – Prevention of Money Laundering and Terrorist Financing

Suzano repudiates any initiative related to money laundering and other illegal forms of concealing or legitimizing illicit financial resources, as well as the financing of terrorist acts.

The Company has control and prevention mechanisms in place to combat money laundering and ensures that its financial resources are not and will not be used for this purpose.

4.8 – Accounting Books and Records

Suzano's accounting and financial records must accurately, clearly, completely, and in sufficient detail reflect all business transactions and operations, ensuring a robust accounting control system and that all assets are properly controlled and accounted for.

False, misleading, or incomplete entries in the accounting control system or other Suzano documents are strictly prohibited. Therefore, any simulation and/or tampering with an operation will be considered a serious violation of this Policy, subject to disciplinary action and applicable sanctions.

4.9 - Facilitation Payments

Even if permitted by local laws in countries where the Company operates or in countries where Suzano does business, under no circumstances are **Facilitation Payments** by Employees and/or Third Parties permitted.

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4.10 – Politically Exposed Persons (PEPs)

As defined in this Policy, **Politically Exposed Persons (PEPs)** are those who, in the last five (5) years, have held or currently hold a prominent public office or have held or currently hold a high-level position in public administration.

Politically Exposed Persons (PEPs), due to their role and position, are more exposed to acts of **Corruption** and **Bribery** and **Harmful Acts against the Public Administration**. Therefore, any relationship with such persons, as well as with their family members, close associates, and companies in which they participate, must be treated with great caution and diligence.

Therefore, all initiatives involving Politically Exposed Persons (PEPs) — including their family members, close associates, representatives, or related persons — must be submitted in advance to the Compliance area for careful evaluation.

4.11 - Third Parties

Third parties or persons related to them acting on behalf of Suzano are not authorized to take any action that constitutes an act of **Corruption** and **Bribery**, **Private Corruption**, **Harmful Act against Public Administration**, or illegal act in their relationship with Public Officials, Public Administration entities, or private entities, including **Facilitation Payments**.

Suzano will only conduct business with Third Parties that operate in accordance with its standards of ethics, integrity, and transparency. Depending on the risk level the Third Party category, as defined in a specific policy, the hiring, maintenance, or formalization of partnerships—including with Third Party Intermediaries—is of subject to prior assessment and risk analysis and reputational analysis (*Due Diligence* or *Background Check*) and, if necessary, the assessment of the integrity and anti-corruption mechanisms and tools implemented by Third Parties.

For the purposes of the effectiveness of this Policy with regard to Third Parties, contracts entered into by Suzano shall contain specific clauses relating to compliance with Applicable Anti-Corruption Laws and the Company's standards of conduct.

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4.12 – MANDATORY TRAINING

Upon admission, all employees must complete the mandatory online compliance training available on Suzano's Learning platform, namely: Code of Conduct and Anti-Corruption ("Mandatory Training").

Depending on the activities performed by the employee, they will be classified as a “risk audience” and will be assigned specific training courses aimed at deepening the content of the Mandatory Training. Employees who do not complete the Mandatory Training within the specified time frame and in accordance with the established parameters will be included in a list to be shared with Suzano's leadership and may be subject to the Policy on Consequences and Disciplinary Measures.

4.13 – COMMUNICATION CHANNELS

If you have any questions regarding the interpretation of this Policy and/or guidance on situations that may arise on a daily basis, always consult the Compliance area.

Email: compliance@suzano.com.br.

In addition, it should be clarified that in cases reported involving suspected **Corruption, Bribery, and Harmful Acts against Public Administration**, as well as any non-compliance with applicable laws, Suzano may report the incident to the competent authorities, providing details of the progress and negotiations, if necessary, as well as collaborating with possible external investigations by authorities.

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

- **Phone:** 0800 771 4060
- **Website:** www.suzano.com.br -> ombudsman.

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Suzano will preserve the confidentiality of information related to investigations of possible violations of the guidelines described here, and it is strictly prohibited to engage in acts of retaliation against anyone who reports an actual or potential violation of this Policy.

5 - RESPONSIBILITIES

The Compliance area is the area of Suzano that has exclusive authority to amend this Policy in any circumstances. Any amendment to this Policy must be communicated by the Compliance area to the relevant interested parties.

6 – APPROVAL OF THE POLICY

For the continuous improvement of the Company's integrity mechanisms, as well as the guidelines set forth in this Policy, periodic risk assessments are conducted in accordance with the characteristics of the business, locations of operation, and Applicable Laws to Suzano. In addition, through oversight by senior management, the effective implementation of such mechanisms and their improvement initiatives is verified.

This Policy was approved by the Board of Directors in December 2025 and enters into force on the date of its approval, in accordance with the authority level determined by the Company, and shall be reviewed at a **minimum every two (2) years**.

The **Compliance area** is the Suzano function with exclusive authority, under any circumstances, to amend this Policy. Any amendment to this Policy must be communicated by the Compliance area to the relevant stakeholders.

7 – VIOLATION OF THE POLICY

At no time will any person covered by this Policy be allowed to invoke ignorance to justify violations or failure to comply. Suzano will take appropriate measures in relation to violations of the rules set forth in this Policy and current legislation.

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In addition to internal measures, violations of the rules set forth in the Applicable Anti-Corruption Laws and/or this Policy are subject to applicable sanctions and legal measures, in accordance with applicable law and jurisdiction.

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8 - MISCELLANEOUS

Exceptions or situations not covered by this Policy shall be evaluated by the Compliance area .

9 -APPENDICES

Not applicable.

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