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Anticorruption Policy				

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1 OBJECTIVE

The purpose of the Anticorruption Policy (“Policy”) is to combat corruption in the relations of Suzano Pulp and Paper S.A. and its subsidiaries (jointly, “Suzano” or “Company”) with the Government, in accordance with Federal Law 12.846/13, Decree 8.420/15, the Company’s Code of Conduct and its other policies. This Policy orients all Suzano workers, including employees, managers and any third party contracted by Suzano to render services in all and any relationship with clients, suppliers and Government Agents with regard to their compliance with the rules established in the Company’s Code of Conduct, in this Policy and in the Integrity Program. It describes the practices to be carried out to avoid Injurious Acts against the Government, Fraud and Corruption and to mitigate risks and effectively combat them, with a view to ensuring the highest standards of integrity, transparency in the processes and practices of corporate governance and Compliance.

2 SCOPE

The Policy applies to all Suzano workers, including its employees and managers as well as any third party, whether an individual or legal entity (and their employees selected to render the services to the Company), contracted by Suzano to render services in all and any relationship with clients, suppliers and Government Agents.

3 REFERENCE DOCUMENTS

- Suzano Code of Conduct, available at:
<http://www.suzano.com.br/portal/grupo-suzano/governanca-corporativa/codigo-de-conduta.htm>.
- Federal Law 12.846/13 and Decree 8.420/15: also known as the “Anticorruption Law.”
- PPG.50.0002 - Donations, sponsorships and injections.
- Corporate Governance Policy

4 DEFINITIONS

Government agent: refers to any person exercising, even if temporarily or without compensation, by election, appointment, designation, engagement or any other form of investiture or relation, an office, position, job or function in the government, whether Brazilian or foreign.

Corporate Risks Area refers to the corporate risks department of Suzano, which reports to the Executive Board of the Company.

Injurious Act against the Government: refers to the meaning provided for in Article 5 of Federal Law 12.846/13, as in force on the approval date of this Policy.

Internal Audit refers to the internal audit department of Suzano.

Audit Committee refers to the audit committee of Suzano, which supports the Board of Directors, as provided for in the Company's Bylaws.

Compliance: refers to conformity with the law and other applicable rules.

Conduct: refers to: (i) obedience to the law (ii) behaving in accordance with the ethical principles and policies of Suzano, particularly the Code of Conduct, this Policy and the other policies and rules of the Company; and (iii) following the processes established in items (i) and (ii) above.

Board of Directors refers to the Board of Directors of Suzano.

Corruption means the effect or act of corrupting someone with the purpose of obtaining illegal or unlawful benefits.

Executive Board refers to the Executive Board of Suzano, elected in accordance with its Bylaws.

Legal Department refers to the chief legal officer and the other employees forming the Company's legal department.

Fraud refers to the act or effect of purposely deceiving someone with the aim of obtaining a benefit, whether financial or otherwise.

Ombudsman refers to the ombudsman of Suzano, a channel for receiving whistleblowing, anonymous or otherwise, involving potential violations of conduct.

Facilitating Payments for Routine Actions refers to payments of any amount or any other non-financial benefit made or given to Government Agents or persons in the private sector with the aim of guaranteeing, facilitating or accelerating the execution of routine actions, such as: (i) facilitating the processing of government documentation; (ii) issue of licenses or permits; (iii) clearance of goods by customs authorities; or (iv) obtainment of police protection/favored treatment.

Covered Persons refers to all natural or legal Covered Persons by this Policy, in accordance with Chapter 2 of this Policy.

Policy refers to this Anticorruption Policy of Suzano.

Integrity Program: the set of measures established by the Company with a view to ensuring Compliance.

5 RESPONSIBILITIES

The Executive Board, with the support of the Audit Committee, is responsible for making decisions based on the investigations and orientations issued by the Corporate Risk Area and Internal Audit in order to guarantee the

sustainability and governance of the Company's relations. The Board of Directors is responsible for decisions directly involving members of the Executive Board.

The Company's structure for combating corruption and promoting corporate integrity, jointly with all levels of the Company, is formed by the following:

- Corporate Risk Area;
- Legal Department;
- Ombudsman;
- Audit Committee;
- Executive Board; and
- Board of Directors.

6 CORRUPTION PREVENTION RULES

6.1 - POLICY DECLARATION

This Policy aims to obtain from all Covered Persons a commitment to Compliance and to the rules and standards of the upstanding and ethical behavior that guides the Company's business conduct, while also disseminating them among the stakeholders of Suzano.

Covered Persons shall: (i) comply with this Policy and act in Compliance, while avoiding any action that could be interpreted incorrectly and and/or is not consistent with the business activities of the Company. (ii) abstain, in any situation or circumstance, from promising, offering, inducing and/or granting any good of value or benefit, whether financial or otherwise, to a Government Agent or any other person with the intent of influencing decisions that affect the Company's business or that seek to obtain privileged and/or confidential information about business opportunities or market activities, including information about competitors or competitive bid processes.

For cases in which there are no signs or evidence of a violation of this Policy and/or the Code of Conduct or any other aspects of this document, Covered Persons shall communicate the fact through the communication channels established in item 6.10 of this Policy.

The decision-making processes of Suzano shall not include the offering of any kind of favor or benefit, which include gifts, gratuities, entertainment, philanthropic donations, political contributions and hospitality benefits.

6.2 - GIFTS AND GRATUITIES

Covered Persons may accept or offer gifts and gratuities provided that each of the following conditions is cumulatively observed:

- May not be seen or interpreted as a bribe, payment or undue attempt to wield influence or as violation of this Policy and/or the Code of Conduct.
- May not be given in cash or equivalents.
- Are in accordance with common business practices.
- Are reasonably connected with a commercial relationship.
- Are characterized as a "remembrance," promotional gift or a simple courtesy.
- Do not exceed the value of one hundred reais (R\$100.00).
- The Covered Person has not received another gift from the same person, whether natural or legal, in the last six (6) months.
- Do not have the direct or indirect purpose of providing a personal benefit to a Covered Person and/or to the Company's business, even if such advantage is not financial.

The offering or receipt of benefits with a value of over one hundred reais (R\$100.00) requires prior approval from the department Director.

6.3 - ENTERTAINMENT

The giving or receiving of tickets for entertainment venues (such as plays, concerts or sports events), except for those sponsored by Suzano, whose value exceeds one hundred reais (R\$100.00) shall be approved in advance by the department's director, who shall make the decision based on the principles defined in item 6.2 above.

6.4 - FACILITATING PAYMENTS FOR ROUTINE ACTIONS

The Company expressly prohibits the making of Facilitating Payments for Routine Actions.

If any payment is made that may be misconstrued, or that may be construed as a Facilitating Payment for Routine Actions, the Covered Person who approves or makes such payment or who becomes aware of the realization of such payment must immediately notify Suzano's whistleblowing channel, which will then handle the matter in accordance with the conduct violation practices established by Suzano.

6.5 - POLITICAL CONTRIBUTIONS BY SUZANO

Suzano may support parties and/or candidates whose ideas and proposals are consistent with its principles, provided that such support is lawful and compliant. However, its political and partisan involvement/contribution, if any, shall always be conducted in a reputable way and comply with the rules, limits and disclosure requirements established by governing law. Any political involvement, however, shall always be guided by the rules established in Suzano's Code of Conduct and in this Policy.

Any Covered Person is entitled to exercise their democratic political-partisan rights. However, political or partisan initiatives involving the Company and/or carried out in the workplace are prohibited. Therefore, all Covered Persons are prohibited from wearing uniforms or materials with Suzano's logo during the exercise of political or partisan activities.

6.6 - PHILANTHROPIC DONATIONS BY SUZANO

The donations made by Suzano are part of its commitment to society and a means to contribute to causes that the Company believes are relevant and aligned with its ideas and propositions. They reflect the Company's identity within the dimension of social responsibility. Such donations shall be made only to support philanthropic causes without the expectation or acceptance in exchange of any benefit of any kind and always in full compliance with governing law.

Donations may be made in cash or assets, including the delivery of goods and the provision of services. Any charges paid to become members of a social or philanthropic association shall also be considered donations for the purposes of this Policy.

Suzano considers a violation of this Policy and to be Corruption any donation made to finance nonexistent or illegitimate philanthropic organizations to conceal undue or improper payments.

Donations may not be offered, promised or granted by Covered Persons and/or by Suzano if their purpose is to influence the action or omission of any Government Agent or to grant any undue benefit, and may not be granted to individuals, legal entities or for-profit organizations whose objectives are incompatible with the principles of Suzano's Code of Conduct and/or this Policy.

6.7 - SPONSORSHIPS

Suzano considers as Corruption any sponsorship that seeks to obtain an undue benefit. To avoid such situations, the Company follows four fundamental principles when analyzing the sponsorship requests it receives: (i) transparency, (ii) rigor, (iii) consistency with Suzano's business; and (iv) full compliance with governing law, this Policy and the Code of Conduct.

The basic guidelines for evaluating potential sponsorships are: operates in Suzano's areas of influence; promotes innovation, corporate governance and/or social and environmental responsibility; synergies with the Company's business; the projects may be replicated through coordination with existing public policies and the multiplying potential of actions and agents; possibility of using tax incentive mechanisms as a way to complement the funding of projects.

6.8 - INTERMEDIARIES

Public corruption generally occurs when companies use third parties as intermediaries to conduct business with the government or to facilitate a government action. Anticorruption laws do not always distinguish acts performed by the actual companies from those performed on their behalf. For this reason, it is necessary to ensure that the Company only uses intermediaries in interactions with Government Agents or clients in the private sector if they follow the same standards of conduct defended by Suzano and are aware of this Policy.

6.9 - MAINTENANCE OF RECORDS AND ACCURATE ACCOUNTING

Books and records are the terms used in this Policy to describe the internal records of Suzano, which includes accounts, correspondence, memoranda, tapes, discs, papers, books and any other documents involving the business or activities of Suzano. This concept is relevant, since the law in force requires companies to keep accurate and thorough books and records. To combat corruption, it is important that transactions be transparent, fully documented and allocated to accounts that accurately reflect their nature.

Camouflaging a payment shall be considered as serious violation of this Policy, potentially even more severe than the actual payment.

Suzano's books and records shall be accurately recorded to reflect the transactions carried out by the companies comprising Suzano, and may not contain, under any circumstances, false or misleading information. Even though bookkeeping is the responsibility of the accounting department, everyone is responsible for maintaining such information if they participate in the process, either by entering data or by supplying the information for the inputting of such data.

All internal control and approval procedures shall be followed.

The transactions and operations carried out by Suzano shall be duly documented, correctly approved and recorded with a proper description of its expenses, in accordance with governing law.

If any Covered Person has knowledge of or suspects that any person is directly or indirectly involved in the falsification of or the making of inaccurate entries in the corporate books and records, or attempting in any way to camouflage, fraud or falsify payments, such Covered Person must immediately communicate said fact to Suzano's Ombudsman or to the Conduct Management Sub-committee or Committee, as per their preference.

6.10 - SUZANO'S COMMUNICATION CHANNELS

In addition to the Ombudsman, Suzano also maintains a structure comprising the following: Conduct Management Committee, Conduct Management Sub-committee, department managers, Internal Audit

and the “Suzano Responde” channel, which may be contacted for instructions and to communicate any cases of non-compliance with this procedure.

- **Ombudsman for Suzano Pulp and Paper:** 0800 771 4060 or ouvidoriaexterna@austernet.com.br
- **Ombudsman for Suzano Holding:** 0800 770 5678 or gruposuzano@austernet.com.br
- **Suzano Responde:** suzanoresponde@suzano.com.br

6.11 - SUZANO'S POSITION REGARDING CONDUCTS IN BREACH OF THIS POLICY

Suzano will take all applicable measures with regard to breaches of the rules established in this Policy or of any other procedure or rule of the Company and/or governing law. Accordingly, the Company has adopted applicable measures for implementing a solid and consistent internal process for managing situations in which Covered Persons fail to comply with such policies, procedures, rules or laws.

The Conduct Management Committee and Sub-committee shall be responsible, in accordance with their respective competencies, for assessing the infraction committed and recommending a disciplinary sanction for each case, which includes, but is not limited to: (i) informal warning (for minor violations of conduct only); (ii) formal warnings; (iii) transfers to other departments/positions; (iv) termination; and/or (v) termination accompanied by a criminal claim.

6.12 - RESPONSIBILITY FOR UPDATING THIS PROCEDURE

In addition to the legal responsibilities associated with the practices described in this Policy, it is the responsibility of the Corporate Risk Area and the Legal Department to update periodically this Policy, with the approval of the Executive Board and of the Board of Directors.

6.13 - PENALTIES

Under no circumstances shall a Covered Person be allowed to claim no knowledge of this Policy to justify any violations or failures to comply.

All and any case of breaches of this Policy shall be subject to the application of disciplinary sanctions by the Conduct Management Committee and Sub-committee, as provided in item 6.11, in the Code of Conduct, in other applicable internal rules, in the Consolidation of Labor Laws, in the Penal Code or in other applicable laws.

6.14 - FINAL CONSIDERATIONS

Exceptions or cases not specifically addressed in this Policy shall be handled on a case-by-case basis by the Conduct Management Committee, based on the principles established herein and in the Code of Conduct.

6.15 - PROTECTION FOR WHISTLEBLOWERS

Covered Persons may not practice acts of retaliation against anyone who in good faith reports any actual or potential violation of this Policy or of the Code of Conduct. The Company shall safeguard the confidentiality of the information related to the investigation of potential violations of the guidelines of this Policy. Anonymous reports shall be accepted by the whistleblowing channels and the anonymity of the person shall be safeguarded. Disciplinary sanctions shall be applied to managers, employees or any other Covered Persons who verifiably act in bad faith when communicating potential violations of the guidelines of this Policy or knowingly communicate false information.