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Internal Controls Policy – Corporate Risks				

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1. OBJECTIVE

The objective of this Internal Controls Policy ("Policy") is to establish the principles and responsibilities to be observed to support the strengthening and functioning of the internal controls systems of Suzano Papel e Celulose S.A. and its subsidiaries ("Suzano" or "Company") in order to mitigate risks in accordance with the complexity of its business and to disseminate the culture of controls to guarantee compliance with the law, regulations and other rules established by regulatory bodies or by Suzano itself.

2. PRINCIPLES

Internal Controls consist of a process developed to guarantee with reasonable certainty the achievement of the Company's objectives in the following dimensions:

- Operating efficiency and effectiveness;
- Reliable recording of data and information;
- Compliance; and
- Risk-based approach.

The Company's Internal Controls must enable Management to monitor the operating and financial processes as well as the risks of non-compliance and discontinuity, in accordance with the policies and limits established by the Board of Directors, in order to improve the sustainability and perpetuity of the Company's business.

Note that all control activities must be constantly assessed based on the best practice of corporate governance established by the standards and structure of the Committee of Sponsoring Organizations of the Treadway Commission (COSO) and of the Control Objectives for Information and Related Technology (CobiT).

3. SCOPE

This policy applies to all areas and departments of Suzano.

4. DEFINITIONS

- **Corporate Risk Area** refers to the corporate risks department of Suzano, which reports to the Executive Board of the Company.
- **Internal Audit** refers to the internal audit department of Suzano.
- **Company** refers to Suzano Papel e Celulose S.A., jointly with its subsidiaries.
- **Compliance** refers to conformity with the law and other applicable rules.
- **Board of Directors** refers to the Board of Directors of Suzano.
- **Compensatory Controls** refers to the controls whose purpose is to mitigate Risks when a certain control activity proves to be deficient in achieving the established business objectives. Compensatory controls do not substitute the control activities addressed in the business processes, but rather aim to minimize the occurrence of errors, fraud or losses.
- **Internal Controls** refers to the set of policies, procedures, methodologies and rules, as well as monitoring activities, automated or otherwise, that aim to reduce the level of exposure to Risk, support the achievement

of the objectives established by the Company, guarantee compliance with laws and regulations and enhance the reliability of managerial reports.

- **Executive Board** refers to the Executive Board of Suzano, whose members are elected in accordance with its Bylaws.
- **Policy** refers to this Internal Controls Policy of Suzano, as amended from time to time.
- **Risks** refers to uncertain factors or events that can cause negative impacts and make it difficult or impossible for the Company to meet its objectives;
- **Business risks** refers to the risks associated with the Company's strategy (political and social environment, market, competitors, mergers and acquisitions, availability of raw materials), with its finances (economic environment, cash generation, indebtedness, investment and funding of financial resources, capital markets, exchange variation), with its compliance (conformity with laws and regulations), with its image and reputation, and with its operations (technologies, management model, corporate culture, training and human resource succession);
- **Operating Risks** refers to the risks arising from the inadequacy or failure of internal processes, people or the technological environment that could make it difficult or impossible for the company to achieve its objectives. These risks are associated with industrial process and with the management of administrative departments, such as marketing and sales, supply, logistics, workplace health and safety, environmental, information technology, people management and labor relations;
- **Suzano** refers to Suzano Papel e Celulose S.A., jointly with its subsidiaries.
- **Tolerance to risk exposure** means the level of risk the Company is willing to accept in its pursuit of value creation. The appetite for risk reflects its entire administrative philosophy and consequently influences its culture and operating style, and must be defined by the Risk Owner, approved formally by the Risk Committee and ratified by the Board of Directors;
- **Risk Owner** refers to the person responsible for managing and monitoring a particular risk;
- **SAP GRC Access Control** refers to the system with a set of resources that monitor, test and apply controls and rules for access and authorization in order to prevent access violations.

5. DEPARTMENT STRUCTURE

The Corporate Risk Area is responsible for the internal controls and subordinate to the Financial Department and interacts with other areas of the Company. The Corporate Risk Area is subdivided into the Corporate Governance, Integrated Risk Management and Access and Process Internal Controls teams.

The main activities of the Access Internal Controls area include granting accesses, reviewing access profiles, analyzing the segregation of functions through the GRC tool. For more information about accesses, please refer to document PPG.00.726.

Meanwhile, the main activities of the Internal Process Controls area include: (i) mapping processes (flowcharts of activities, process narrative, risk matrix, controls matrix and action plan); (ii) reviewing the Company's processes; (iii) testing controls; (iv) analyzing faults, among others.

6. GUIDELINES

This Policy has the following guidelines:

- Disseminating to all Suzano employees a culture centered on the importance of Internal Controls;
- Ensuring compliance with rules and regulations and observing the other policies and internal procedures of Suzano;
- Aligning the internal controls structure with the risks and objectives of the business;
- Ensuring the existence of accountability and the delegation of authority, in accordance with Suzano's hierarchical structure, to ensure the proper segregation of functions and eliminate conflicting responsibilities;
- The Risks are identified and assessed in accordance with the probability of their occurrence and with their impact on the business, including on the Company's image. Each decision takes into account the benefits, negative aspects and associated risks, with the measurement of the impact-mitigation tradeoff.

7. RESPONSIBILITIES

7.1. BOARD OF DIRECTORS

- Approving the Internal Controls Policy – Corporate Risks and its revisions;
- Monitoring the results of the management activities involving Operating Risks and Business Risks;
- Deciding on the strategic aspects of management processes involving Operating Risks and Business Risks, such as the Company's level of Risk tolerance.

7.2. EXECUTIVE BOARD

- Managing the business, operations and development of strategic projects, which are subject to approval by the Board of Directors.

7.3. INTERNAL CONTROLS

- Continually disseminate the culture of managing the Risks and Internal Controls (corporate governance) in the Company;
- Updating the Company's overall Risk analysis;
- Supporting the identification, assessment, mitigation, monitoring and reporting of the Business Risks and Operating Risks inherent to the Company's activities;
- Monitoring the Business Risks and Operating Risks in partnership with the business and operations areas;
- Establishing an annual schedule for reviewing the business processes, jointly with the Internal Audit area;
- Validating the scope of the risk management work with the Executive Board and the Board of Directors;
- Documenting the risks and internal controls of business processes;
- Conducting walkthroughs of business processes and controls prior to making the documentation available to the Internal Audit area;
- Analyzing the requests to create profiles for accessing the Company's systems;
- Reviewing the access profiles and ensuring there are no conflicts in the Segregation of Functions in the systems used by the Company;
- Monitoring compliance with the Company's policies and procedures;

- Monitoring the results of the risk indicators under the responsibility of the business and operations areas.

7.4. RISK OWNER

- Informing in a timely manner the Internal Controls area of any unmapped risks, whether new or not previously identified;
- Monitoring the Risks under their responsibility;
- Supporting the definition and implementation of the action plans required to repair and/or mitigate Risks.

7.5. BUSINESS AND OPERATIONS AREAS

- Updating the documentation for business processes;
- Formulating action plans and implementing them in order to mitigate any relevant vulnerability identified in its operations;
- Conducting thorough and adequate self-evaluations of controls.

7.6. AUDIT COMMITTEE

- Overseeing the activities of the Internal Controls department;
- Monitoring the quality and integrity of the mechanisms responsible for the Company's internal controls and making recommendations to improve policies, practices and procedures when deemed necessary;
- Evaluating the effectiveness of the Internal Controls system, encompassing strategic, financial, operating and compliance risks;
- Expressing opinions to the Board of Directors regarding the indicators and reports on the Company's Internal Controls system.