



LD Celulose
Anti-Harassment and
Anti-Discrimination
Policy





LD Celulose - A sustainable company in all aspects

Sustainability is a core value for LD Celulose and a fundamental aspect of our corporate strategy. It covers three dimensions PEOPLE, PLANET and PROFIT, balancing the needs of society, environment and shareholders. As the sustainability leader in our industry, we proactively strive to improve sustainability performance in all aspects of our business. Our objective is to incorporate the best sustainability practices, aiming to increase the life cycle, collaboration, transparency, respect and partnerships with stakeholders in all our activities and in business decision-making to achieve society's long-term goals. Our approach is creating more positive impacts or benefits with our business practices and products to make the world a better place.

Purpose

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The purpose of this document is to present the guidelines for Combating Harassment and Discrimination in order to ensure full understanding, by LD Celulose employees and contracted and subcontracted companies, including service providers that are part of the Amadeus Project, of the internal and external rules, which prohibit the practice of harassment and discrimination on the company's premises or whenever activities are performed on its behalf. With the establishment of this policy, LD CELULOSE reinforces its commitment to offering a work environment free from discrimination, intimidation and harassment, promoting equal opportunities and ensuring that people are treated with dignity and respect.

Reference Documents

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- ▶ Code of Conduct
- ▶ Code of Conduct for suppliers
- ▶ Investigation Guidelines
- ▶ Whistleblower Guidelines
- ▶ Consequence Management Policy

Assumptions

03

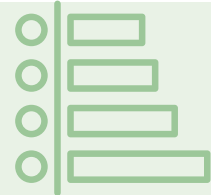
The guidelines of this Policy must be followed in their entirety by everyone, regardless of hierarchical level, as well as by the people who represent the company in any sphere and in the relationship with stakeholders.

This Policy is subject to revision in the event of changes in the applicable regulations and/or legislation, or to reflect changes in LD CELULOSE's internal procedures.

Failure to comply with this Policy may result in the Company being penalized, and, in this way, it aims to ensure that the appropriate consequential actions are applied uniformly, maintaining transparency, a sense of justice and equity in the decisions of managers, in accordance with the provisions and limits provided for in current legislation.

Suppliers, service providers and customers who have a relationship with LD CELULOSE must be informed about this Policy, and must, during the period of their relationship with the Company, follow its guidelines.

Deviations verified in compliance with the guidelines and rules of this policy, or omissions therein, will be submitted to the evaluation of the responsible area, for joint resolution with the Board of Directors of LD CELULOSE, subject to the application of sanctions provided for in the Consequence Management policy and Misconduct Seriousness Classification Table



Definitions

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Moral Harassment: Moral harassment is the exposure of workers to humiliating and embarrassing situations, in a repetitive and prolonged manner, during the working day and in the exercise of their functions. It is an abusive, extreme, purposeful and frequent conduct, which can generate negative consequences for the worker's self-esteem, in addition to hurting their dignity. It can be exercised by a hierarchical relationship or by imitation of a model, when the other person on the team reproduces the harasser's behavior, as a defense and guarantee not to become the next harassed person.

Sexual Harassment: the act of power, sexual coercion exercised by a hierarchical superior or ascendance inherent to the exercise of a job, position or function, between co-workers or directed to third parties (not employees of LD and its representatives), and is characterized by sexual insinuation or proposal unwanted by one of the parties. This sexual proposal can be verbal, nonverbal or physical, in an insistent and inappropriate way, with the aim of obtaining sexual advantage.

Code of Conduct: it is a guide to the professional and personal performance of all LD CELULOSE staff, at different hierarchical levels, as well as serving as a reference for customers and partners, in the activities and businesses developed by it, establishing a standard of ethical, respectful, transparent and socio-environmentally responsible relationship.

Staff: all employees, interns, minor apprentices, members of the Board of Directors, Superintendents, Officers, Managers, Coordinators, executives and service providers of LD CELULOSE.

Ethics and Conduct Committee or Committee: it is responsible for analyzing suspected ethical deviations forwarded by the Compliance Area, determining the investigation of the facts, analyzing and deciding on possible violations committed by a staff member, in addition to submitting opinions and matters deemed significant for examination by the Executive Board. The decisions of the Committee are binding and must be accepted and complied with by all members of LD CELULOSE;

Company: LD Celulose S.A., or LD Celulose;

Compliance: The term compliance originates from the verb to comply, which means to act in accordance with a rule, an internal instruction, a command or a request, that is, to be in "compliance" is to conform with external and internal laws and regulations;

Discrimination: any action taken or practice adopted that makes distinctions between individuals or

groups in a way that disadvantages a person or a group of people and favors others on the basis of an attribute or on illegal or irrelevant characteristics under the situation. Such attributes may include, among others, personal characteristics, skin color, social class, beliefs, sex, sexual orientation, age, disability, temporary or permanent physical limitation, or ethnic, cultural and/or religious characteristics;

Manager: person responsible for developing, managing, monitoring and evaluating the performance of the staff under his management, with a view to achieving the strategic objectives stipulated at LD CELULOSE;

HR: is the Human Resources area of LD CELULOSE, also called Human Resources Department, whose scope of action is defined by the HR Executive area, and by the policies or standards of LD CELULOSE.

The definitions detailed above may be used in the singular or in the plural, and in both cases their meaning is maintained for the purpose of application in this Policy.

Basic Guidelines

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LD CELULOSE respects Human Rights and does not allow any type of discrimination of gender, race, religion, age and people with disabilities (PwD) in any case. Also regarding salary evolution, promotion or training processes, LD CELULOSE has as its guideline to act with transparency, respect and compliance with current labor laws, including its Global Code of Business Conduct, in the execution of processes involving its employees, with a view to ensuring equal opportunities for all.

The ethical principles portrayed herein are provided for in LD CELULOSE's Global Code of Business Conduct.

LD CELULOSE does not tolerate any act of discrimination or harassment, whether moral or sexual, by its staff, including service providers, against other staff members, customers, third parties or any audience.

In particular, the selection processes for admission or dismissal at LD CELULOSE will not be influenced by sex, race, ethnicity, nationality, age, disability, religion, sexual orientation, gender identity or expression.

Discrimination based on a staff member's sex, race, ethnicity, national origin, age, disability, religion, sexual orientation, gender identity or expression, or any other characteristic protected by law will not be tolerated and is prohibited under this Policy.

LD CELULOSE requires that its suppliers, service providers and customers comply with the legislation of the country, that they do not deliberately practice discrimination or harassment (moral and/or sexual), and that they commit to social responsibility practices in their production chain.

Staff must treat other (potential) staff members equitably, act with care and consideration and not discriminate them in the performance of their duties. Any anti-discrimination initiatives must be carefully verified to ensure compliance with the rules of the Code of Ethics and Conduct and with current legislation.

It is of fundamental importance to identify what can in fact be characterized as moral harassment, in order to differentiate it from the exercise of the hierarchical power of control and organization of work, which is the responsibility of the Company's managers.

For conducts to be considered moral harassment, they must be repeated over time, be directed at a specific person or group of people, and have the deliberate objective of harming and/or offending the victim(s).

In this sense, isolated acts, conflicts, discussions even with a high tone of voice, or even the use of foul language do not constitute Moral Harassment, although they can generate moral damage. Demands for productivity and respect for current regulations, stress caused by times of peak work are also not considered moral harassment.

LD CELULOSE undertakes to monitor and inspect ethical conduct at all LD Celulose operations and together with its suppliers, to adopt measures it deems applicable when it perceives unethical attitudes from them.

Specific Guidelines

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The following will not be tolerated or allowed by LD CELULOSE:

- ▶ Throwing insults, making comments or obscene gestures towards staff members, customers or third parties;
- ▶ Making unwelcome sexual advances, unwelcome physical contact of a sexual nature, unwelcome requests for sexual favors and physical, verbal or visual conduct of a sexual nature;
- ▶ Making jokes or comments with sexual connotation about staff members, customers or third parties;
- ▶ Intrusive questions about a person's personal life;
- ▶ Inappropriate comments on social media;
- ▶ Disseminating photographs of a sexual nature through electronic messages (emails), posts on social media, messages via WhatsApp, or on another social communication vehicle;
- ▶ Accessing pornographic material on websites in the work environment;
- ▶ Excessive intimacy, unwanted;
- ▶ Exposing people to embarrassing, intimidating or humiliating situations due to abuse of power by the hierarchical superior;

- ▶ Permitting or condoning with the purposeful deterioration of the employee's working conditions through:
 - ▶ Constant criticism of the person's work, unfairly or exaggeratedly;
 - ▶ Imposition of humiliating tasks;
 - ▶ Attribution of contradictory demands;
 - ▶ Repeated, groundless contestation of the person's decisions;
 - ▶ Omitting material information for performance of the work or misleading the harassed person;
 - ▶ Imposing personalized work conditions and rules, different from those charged, for the same activity, from other team members, more laborious or even useless;
 - ▶ Unavailability of access to the instruments necessary for the performance of the employee's work;
 - ▶ Restricting the staff member's activities, leaving them without any tasks to perform, causing a feeling of uselessness and incompetence;
 - ▶ Spreading rumors about the harassed person;
 - ▶ Making hostile criticism of their professional ability;
 - ▶ Disregarding the person's health problems or physical restrictions;
 - ▶ Disclosing private information about the person's health status or physical restrictions to other team members, except in cases where this is essential or where the person has already made a public communication in this regard;
 - ▶ Insinuating that the person has psychological disorders;
 - ▶ Limiting the number of times and monitoring the time spent in the bathroom;
 - ▶ Disregarding or making ironies in the face of the harassed person's opinions;
 - ▶ Adopting behaviors or gestures that show contempt for the conduct or expressions of opinion of the harassed person;
 - ▶ Conducting recurring discussions using a high tone of voice with the harassed person;
 - ▶ Threat of physical violence;
 - ▶ Listening to telephone calls, reading emails or correspondence, except in the case of investigations for non-compliance with the precepts of the Code of Ethics and Conduct;
 - ▶ Interfering with women's family planning, requiring them not to get pregnant;
 - ▶ Disregarding medical recommendations for pregnant women or people with physical limitations in the distribution of tasks;

- ▶ Preventing professional development, organizational growth or dismissal due to color, race, nationality, culture, age, religion, sex, sexual orientation, disability, gestational status or the exercise of legal leave;
- ▶ Physical or verbal aggression against someone because of their color, race, nationality, culture, age, religion, sex, sexual orientation, disability, gestational status or exercise of legal leave;
- ▶ Prohibiting access to a certain place, under the justification of color, race, nationality, culture, age, religion, sex or sexual orientation;
- ▶ Excluding or discriminating people with disabilities;
- ▶ Discriminating people with diseases, especially incurable ones;
- ▶ Permitting or condoning with the deterioration of working conditions through:
 - ▶ Holding training courses in a discriminatory manner based on color, race, nationality, culture, age, religion, sex, sexual orientation, disability, or gestational status. Coupling any salary changes, promotions or training with any motivation other than the employees' merit, achievements and possibility of growth. Criteria of the Manager's personal preferences, gender discrimination or any characteristic other than that of providing growth for the team as a whole are unacceptable. Conducting interviews related to the admission process of new employees exploring topics considered to be of a personal nature to the interviewee that may embarrass them, for example, social, political, religious orientation. Interview must be conducted with the aim to verify the applicant's qualifications and knowledge of their professional situation. The interview process should be intended to enable knowledge of behavioral characteristics, knowledge of how the professional behaves outside the work environment, what challenges they will face when moving to the place where they will perform their function, family situation and adjustment of the family to the new place of residence (if applicable).



What to do in case of harassment or discrimination

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In case of violation of this Policy, staff must, first and foremost, report the problem directly to their hierarchical superiors or directly to the Compliance department. Communication to the Manager should be the fastest and preferred way and the best way to ensure a positive and open work environment throughout LD CELULOSE. The communication can be made to HR, if the employee prefers.

If the staff member does not feel comfortable reporting the problem as above, they should use the Whistleblower Channel: 0800 800 5252 or the website www.contatoseguro.com.br/ldcelulose. Reports can be anonymous or not, at the discretion of the whistleblower. Anonymity is guaranteed by a protocol number that is offered by both channels and that gives access to verification of the status and resolution of the case.

All reports made through this procedure will be treated with strict confidentiality and full guarantee that there will be no retaliation against any Staff Member who submits a complaint in good faith, as also provided for in LD Celulose Global Code of Conduct.

Reports will be investigated by the Investigation Committee formed by (Officer, Manager and Compliance Specialist) and taken to the Committee formed according to the classification of the report, which will judge these cases and propose the appropriate resolutions/actions. Therefore, it is important that, in the event that the staff member is being subjected to harassment or discrimination, they have available evidence to prove such acts. Thus, it is recommended that situations of harassment or discrimination be noted, with attention to details such as: day, time, place, name(s) of those involved and people present at the time, content of conversations, among others. Gathering evidence of harassment or discrimination is important so that the facts can be ascertained.

If reports related to harassment or discrimination are received by the Ombudsman channel, the Ombudsman will guide the whistleblower to use the correct Reporting Channel.

Consequences

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If discrimination or harassment is proven, corrective actions and/or disciplinary measures will be taken by LD CELULOSE in accordance with the Consequence Management policy and the Misconduct Seriousness Classification Table, as well as those measures provided for in current legislation.

It is noteworthy that the Criminal Code provides, in its art. 216-A, for the crime of sexual harassment, characterized as a constraint intended to obtain sexual advantage or favor, in which the agent uses their hierarchical superior status or ascendance inherent to the exercise of a job, position or function.

Although not subject to a specific legal prohibition, the practice of moral harassment can be classified in provisions of the Criminal Code, such as libel (art. 138), defamation (art. 139) or slander (art. 140), and could also give rise to the filing of an indemnity action in the civil sphere. Finally, the characterization and penalty resulting from discrimination has a law of its own (Law No. 7.716/1989).

Conclusão

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LD Celulose strives to grow and learn, making room for improvements in the writing and implementation of this policy, hoping that its employees, customers and third parties can contribute to a fairer and more respectful culture within LD Celulose work environment.