TAX CONDUCT POLICY

Suzano S.A. is the world's leading producer of eucalyptus pulp and one of Latin America’s largest paper producers. In addition to having operations in various countries, it also is a key client of countless important suppliers from Brazil. As a globally engaged company, Suzano S.A. contributes to economic growth and development by making strategic investments in the countries and industries in which it operates, while creating thousands of jobs, transferring value added to governments around the world, fostering local economies in a structured sustainable way and generating the collection of taxes from its activities.

The purpose of this policy is to establish guidelines for the tax conduct to be followed by Suzano S.A. and its subsidiaries in all relations involving tax aspects.

The Tax Conduct Policy is based on the provisions of Suzano’s Code of Conduct, is applicable to all employees and guides, and regulates the decisions and behaviors in its relations with the public sector, shareholders, investors, clients, consumers, competitors, suppliers and employees. It also guides the work methods in the exercise of its responsibilities, with a focus on integrity, legality, ethics and transparency.

Moreover, Suzano S.A. bases its Tax Conduct Policy on compliance with the tax regulations in force in all countries where it operates.

The tax strategy adopted by the Company is aligned with the current business and its future plans. In this context, only the tax opportunities pertaining to the Company’s business plan are analyzed. All tax-related decisions stem from the business strategy and as such are additional effects on the results of the commercial and operating activities, with a reduction in the cost and/or tax impact only one of the various factors taken into consideration in investments and business decisions, and not the main factor.

This Tax Conduct Policy is further complemented by Suzano’s Risk Management Standards, which cover definitions of the different roles and responsibilities related to taxation. The Company’s tax strategies are monitored by the Board of Directors and the Statutory Audit Committee if applicable. Any changes to the Tax Conduct Policy must be approved by the Company’s Chief Financial Officer.

Suzano adopts the following principles for its Tax Conduct Policy:

Compliance with governing law:

The business principles of Suzano S.A. and its subsidiaries are based on the duty to rigorously comply with the tax regulations and laws in force, always aligned
with the strategies defined by the Company’s Management to ensure the assessment and payment of taxes due in all jurisdictions where it operates.

The Company’s tax conduct adopts the highest standards of integrity and ethics, under which all employees working in the tax department follow the content herein as a basic framework when performing their duties.

**Transfer prices and related-party transactions:**

Suzano S.A. strives to comply with the regulatory standards related to transfer prices in transactions conducted between related parties at the international level. The tax rules of each country are analyzed jointly with the operational context of each subsidiary. All changes in transfer price procedures have the approval and participation of the Controllership team, which reports directly to the Company’s Financial Department.

The Company’s standard policy is to file, report and disclose the information required and demanded to duly comply with legal requirements and requests from the tax and regulatory agencies (local and international).

Moreover, the companies of the Suzano group acknowledge the importance and strive to document the transfer prices methods applied in each transaction between the companies of the group. The policy adopted by the Company consists of following and applying in all related-party transactions the transfer pricing rules applicable in each country in which it is located, including the guidelines of the OECD, if applicable, to the sales and purchases of goods, services, loans and advances, the use of tangible assets, intangible rights, etc.

**Commercial operational strategy:**

The commercial operations of Suzano S.A., as well as the determination of the establishment of the group’s companies, are guided by a focus on excellence in customer service, offering more efficient logistics and taking into account the clients’ markets.

The activities performed by the Company and its subsidiaries are taxed in accordance with the laws in force and applicable to each jurisdiction where they are domiciled. All information disclosed or submitted to government agencies follows the guidelines described herein.

The Company and its subsidiaries in Brazil are taxed based on the taxable income and presumed income regimes, in accordance with the applicable legislation.
**Taxation transparency:**

All information about the taxes paid by the Company are presented in the financial statements published annually (for more information, refer to public Financial Statements).

Income tax is calculated based on the tax legislation in force on the reporting date. Positions assumed in the declarations of income tax are revalued periodically, in accordance with changes in case law.

The Company adopts as guiding principles the transparency and integrity of its tax information, which can be accessed in the regular reports disclosed by the Company.

**Relations with Tax Authorities:**

To demonstrate the transparency of its operations, Suzano S.A. adopts a commitment to submit all information regarding the applicable tax regime to the Tax Authorities by means of the accessory obligations required by laws in effect. Suzano strives to maintain ethical relations, within the legal precepts, with all Tax Authorities of any hierarchical level and in all spheres, with regulatory agencies and other public sector entities.

**Tax incentives and benefits:**

In cases when the Company or its subsidiaries plan to carry out new projects or transactions with significant impact or there are divergences in the interpretation regarding the application of tax standards, the negotiation of tax incentives, benefits or agreements with the responsible Tax Authorities is adopted as the principle, aiming to safeguard the Company's procedures, with such negotiations always based on ethics, transparency and compliance with legal precepts.

All negotiations with the Tax Authorities seeking the granting of tax incentives, benefits or agreements are based on respect for the law and for good business practices. The Company considers it unacceptable to condone any form of corruption in business, which is why all its employees are oriented not to offer or accept any bribes for the purpose of obtaining benefits, incentives or agreements in taxation or reductions in tax burden.

**Tax, financial and non-financial risk management:**

The conduct of Suzano S.A. with regard to the management of tax risks is established by the Risks and Compliance and Internal Audit Department, always with the support of the risk analyses conducted by the Legal Relations and
Management Office. These areas cover the activities of risk management, corporate governance, internal controls, internal audit and ombudsman with the goal of ensuring that all persons with tax-related responsibilities – or whose activities entail tax impacts – have a single and clear understanding of how tax risks must be identified, assessed, reported and managed.

The goal of the aforementioned areas is to strengthen the Company’s governance. The Internal Audit Department reports to the Company’s Board of Directors. The Risks and Compliance Department reports directly to the Chief Financial Officers and its activities are monitored by the Statutory Audit Committee (advisory body to the Board of Directors). Lastly, the Legal Relations and Management Office, responsible for analyzing the legal effects of identified risks, reports directly to the Company’s Office of the CEO.