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1. PURPOSE

This Human Rights Policy formalizes Bracell’s commitment to sustainable development and best practices that positively impact people and communities. Bracell’s vision of shared value creation follows its Group founder’s 5Cs philosophy, where “all our actions must be good for the Climate, Communities, Customers and Country, and only then will they be good for the Company”. These values are incorporated in and emphasized in its Code of Conduct and Sustainability Policy.

2. SCOPE

This Human Rights Policy applies to all Bracell operations—including all business units and legal entities—and to Bracell’s relationships with all stakeholders, including contractors and subcontractors, local communities, business partners — including from the Forestry Partnership Program, customers, financial institutions, government organizations, trade associations, suppliers, and other priority stakeholders. The principles outlined in this policy are also disseminated throughout Bracell’s value chain.

3. DEFINITIONS

- Bracell Code of Conduct: establishes guidelines on ethical conduct and incorporates Bracell’s commitment to upholding globally recognized business standards in its daily processes and practices. The document is available at: <https://www.bracell.com/wp-content/uploads/2022/10/Codigo-de-Conducta-Bracell.pdf>
- UN International Bill of Human Rights: consists of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights. Can be found at:
 - <https://www.un.org/en/about-us/universal-declaration-of-human-rights>
 - <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights>
 - <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights>
- UN Guiding Principles on Business and Human Rights: in June 2011, the UN Human Rights Council approved the Guiding Principles on Business and Human Rights, which prescribe not only what should be done by government and business to manage better the risks against human rights, but also indicate how to do it. They are structured around three pillars: protect, respect and repair. The document can be found at:
 - https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf
- Declaration of the International Labor Organization (ILO) on Fundamental Principles and Rights at Work: in 1998, the ILO Declaration on Fundamental Principles and Rights at Work was adopted. The document is a universal reaffirmation of the commitment of member states, and the international community in general, to respect, promote and apply in good faith fundamental principles and rights at work. Find it at:
 - https://www.ilo.org/brasil/publicacoes/WCMS_230648/lang--pt/index.htm

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- United Nations Declaration on the Rights of Indigenous Peoples: resolution approved by the United Nations in 2007, which outlines and defines the individual and collective rights of indigenous peoples. Find it at:
 - https://www.acnur.org/fileadmin/Documentos/portugues/BDL/Declaracao_das_Nacoes_Unidas_sobre_os_Direitos_dos_Povos_Indigenas.pdf

4. GUIDELINES

Bracell respects the dignity and human rights of its employees, contractors, and subcontractors, as well as the rights of indigenous peoples and local and traditional communities. Bracell takes a no-tolerance stance on any use of violence or any form of intimidation, threat, or coercion. Recognizing its role as a catalyst for economic and social development, the Company acknowledges the transformational impact its business has on local communities. Consequently, Bracell is committed to promoting and strengthening initiatives for regional and local territorial development through Bracell Social, its private social investment program. As part of this commitment, works to strengthen and develop enabling social programs that deliver consistent and enduring benefits for local communities. Bracell achieves this through shared decision-making with a focus on the Sustainable Development Goals and the three core pillars of Bracell Social: Education, Empowerment, and Enhancement.

To meet these goals, Bracell will:

- Act in accordance with the following internationally recognized human rights conventions and standards:
 - UN International Bill of Human Rights;
 - UN Guiding Principles on Business and Human Rights;
 - International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work;
 - UN Declaration on the Rights of Indigenous Peoples.
- Comply with local and national laws, including all relevant international treaties ratified by the Government of the Federative Republic of Brazil;
- Respect the right to Free, Prior and Informed Consent (FPIC) as one of the fundamental principles of international human-rights law, in order to safeguard the well-being of indigenous peoples and traditional communities;
- Recognize and uphold both legal and customary land tenure rights;
- Respect the dignity and rights of traditional communities, and promote initiatives to preserve and celebrate their unique cultures;
- Refer to international standards and voluntary initiatives that can help address any unique set of human rights challenges;
- Maintain transparent procedures and policies on relations with communities surrounding its forestry areas and mills, fostering continuous communication and engagement and providing timely and transparent information on the identification, assessment, and monitoring of social aspects and impacts, as well as implementing measures to control and mitigate any adverse impacts;
- Maintain continuous dialog with stakeholders, especially local communities, ensuring they are informed and consulted regarding any activities that could impact them;
- Gain an understanding of the local context and engage stakeholders before initiating any social programs, in order to achieve more participatory and effective results;

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- Recognize and invest in education as a vital tool for enhancing quality of life and promoting environmental preservation in communities;
- Support the social and economic development of communities in the regions where the Company operates by strengthening local productive arrangements;
- Track social indicators for its projects and operations;
- Establish partnerships whenever possible to optimize the impact of social programs;
- Preferably invest in enabling programs rather than charitable ones, aiming to deliver sustained and enduring benefits for local communities;
- Through Bracell Social, support traditional communities by upholding their rights and encouraging initiatives that preserve their unique culture and livelihoods;
- Through Bracell Social, prioritize communities residing near its operations.

4.1.1 LABOR PRACTICES AND DECENT WORK

Bracell actively works to ensure respect for, the development of, and engagement with people within its operations. The Company is committed to providing a safe, healthy and productive work environment for all employees, contractors and subcontractors working in its operations.

Bracell also seeks to mirror the diversity of its communities within operations and to create a workplace environment that is welcoming, inclusive, and psychologically safe, where people can feel free to be themselves and be their best to achieve optimal business results.

Specifically, Bracell commits to:

- Eliminate any situations that jeopardize workers’ life, freedom, physical and psychological integrity, fair compensation, freedom from forced labor, bonded labor or mental coercion, or personal safety;
- Not tolerate any form of discrimination, threats, harassment, or abuse. Treat everyone with respect and equity. Respect diversity of gender, race, sexual orientation, social status, marital status, ethnicity, religion, education, age, abilities, skills, culture, life experience, and other forms of diversity;
- Promote career management and training initiatives;
- Promote equal opportunity and diversity in the workplace, including equal opportunity and participation for women, and implement organizational policies to eliminate all forms of discrimination, violence, and sexual and workplace harassment, and combat any forms of physical or psychological harassment, intimidation, abuse, or threats;
- Strive for continuous improvement in working conditions, health, and safety. Provide a safe, clean, and well-equipped work environment, ensuring the availability of personal protective equipment and providing ongoing training on occupational health and safety to employees, contractors, and subcontractors;
- Respect the rights of all workers to collective bargaining and union representation, and ensure that they can exercise those rights without fear of retaliation or discrimination;
- Ensure that all employees have employment contracts or terms and conditions as required by law, and prioritize hiring skilled labor from the regions where Bracell operates;
- Take a zero-tolerance stance on any form of forced labor, modern slavery, human trafficking, physical and/or psychological violence or other abuse, ensuring workers are free to leave work or terminate their employment upon notice in line with labor regulations;

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- Provide fair wages, working hours and benefits that meet legal or industry standards while engaging with the relevant experts and local stakeholders, such as labor unions;
- Have zero tolerance for child labor;
- Cultivate and strengthen a culture of sustainability and ethics among employees, addressing topics such as energy efficiency, initiatives to reduce greenhouse gas emissions, and social responsibility;
- Cover recruitment fees (for obtaining or retaining employment), including all fees, charges, costs, assessments, or other financial obligations associated with the employee recruitment process.

4.1.2 MANAGING HUMAN RIGHTS IMPACTS

Bracell will strive to prevent and mitigate Human Rights risks in its operations and supply chain through existing management measures.

Bracell respects the fundamental rights of local and traditional communities, as well as the rights of vulnerable groups such as indigenous peoples, diversity groups (including women, Black people, and LGBTQIA+ people), and migrant, refugee, and temporary workers. In line with this commitment, Bracell actively works to mitigate climate-change risks and strives to create positive environmental value while contributing to the well-being, health, and safety of local communities.

Bracell commits to:

- Develop and apply a Human Rights Due Diligence framework to identify potential and actual Human Rights risks and impacts of its operations;
- Prevent or mitigate any identified or potential adverse Human Rights impacts related to its operations on local communities, indigenous peoples and traditional communities;
- In case of any identified Human Rights impacts, cooperate in the remediation through processes, dialogue and the engagement of the parties affected;
- Collaborate with suppliers to establish robust management and monitoring mechanisms to ensure respect for and protection of Human Rights in their operations.

4.1.3 STAKEHOLDER ENGAGEMENT

Bracell is committed to identifying and preventing risks of human-rights violations involving its stakeholders and/or their representatives, and to implementing relationship-building initiatives to:

- Inform neighboring communities about upcoming forestry operations in their vicinity, including potential risks and both positive and negative impacts from these operations;
- Strengthen its relations with communities and neighbors;
- Enhance communication with communities and neighbors;
- Identify, prevent, and minimize potential impacts from its operations on these communities and neighbors (through processes to assess economic, social, and environmental impacts);
- Mitigate the risk of potential community issues that could affect its operations;
- Address inquiries and concerns regarding operational aspects and the company as a whole.

Bracell commits to:

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- Engage with relevant stakeholders and/or their legitimate representatives, through transparent dialog;
- Recognize the importance of diversity and cultural heritage in its communities, and understand the differing needs of groups within its communities;
- Collaborate with suppliers and customers in their Human Rights management practices, specifically regarding the mitigation of risks and/or negative social impacts, and establish procedures and control mechanisms to formalize suppliers' commitment to adhering to Bracell's Procurement Code of Ethics (COPE) and Code of Conduct;
- Support the development of local communities by linking social inclusion and sustainability so that people can hone their skills and access opportunities for a better life.

4.1.4 GRIEVANCE MECHANISMS

Bracell has in place, and actively disseminates, formal channels for communication with stakeholders. These channels can be used to submit requests for information, inquiries, complaints, concerns, and reports on misconduct and non-compliance with laws and regulations, Bracell's Code of Conduct, and regulatory standards. All information communicated through these channels is kept anonymous and confidential. These channels include:

- **Bracell Escuta:** for reporting cases of misconduct and non-compliance with laws and regulations or Bracell's Code of Conduct and other policies. Reports can be submitted by email at bracell_escuta@bracell.com or by calling 0800-006-6012 (Bahia and Sergipe) or 0800-033-3384 (São Paulo and Mato Grosso do Sul).
- **Contact Us:** a channel for submitting questions, suggestions, compliments, and complaints. Stakeholders can contact the channel by calling 0800-284-4747 or writing to faleconosco@bracell.com (for Bahia and Sergipe) or by calling 0800-709-1490 or writing to faleconoscorp@bracell.com (for São Paulo and Mato Grosso do Sul).

In addition, Bracell employees have the option to lodge complaints and grievances in person through their managers, the Human Resources team, and the Internal Audit department.

Bracell also commits to:

- Ensure that no one will be penalized for raising with management any suspected violations of Bracell's Policies, or any legal or ethical concerns;
- Regularly monitor the effectiveness of its grievance resolution mechanisms.

4.1.5 GOVERNANCE AND REPORTING

Respect for Human Rights is an integral part of Bracell's overall management approach and sustainability commitments.

Bracell's top management is responsible for strategic decision-making, evaluating potential investments, tracking the Company's social and environmental performance, and ensuring the implementation of a robust sustainability governance, including Human Rights, at Bracell.

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The Company will regularly review and report on progress made in identifying, mitigating and remedying any Human Rights violations. This will be done through Bracell’s Annual Sustainability Report, as well as on Bracell’s Disclosures Hub.

5. RESPONSIBILITIES

All employees are responsible for putting into practice and disseminating the guidelines in this Policy.

6. UPSTREAM DOCUMENT

- Bracell Sustainability Policy

7. FINAL CONSIDERATIONS

- This Policy will be subject to regular monitoring and periodic review, aligned with Bracell’s overall continuous business improvement. Bracell is committed to raising awareness, training and engaging stakeholders — including direct employees, contractors, subcontractors, business partners and suppliers — on the guidelines in this policy.

8. ISSUANCE AND APPROVAL

This policy has been issued under the responsibility of the Sustainability department.