



"DE" POLICY

Klabin

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<i>Title</i> PDE - PROTECTION OF LIFE	<i>Business</i> Corporate
	<i>Unit</i> KLA - Klabin SA
<i>Department Responsible for the Document</i> GST - Gerência Segurança do Trabalho Corp	<i>Information Classification</i> Internal
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Last change summary

Inclusion of terms that demonstrate the company's prioritizing of risk management action plans.

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1. OBJECTIVE

To ensure the physical safety of employees and outsourced workers through risk management, the recognition of safe attitudes, and management of administrative sanctions, strengthening management for safe behaviors through a safety education process.

2. SCOPE

This policy applies to Klabin and companies in which Klabin holds a direct or indirect 100% stake in Brazil or abroad. This policy must be reproduced in companies controlled in Brazil or abroad, directly or indirectly, by Klabin in compliance with applicable legislation and regulations, as well as their respective constituent documents. The application of this policy is recommended in other companies, in Brazil or abroad, in which Klabin holds a relevant stake.

3. DEFINITIONS AND TERMINOLOGY

- **Recognition**

Existing practice in the Unit to strengthen examples of safety behaviors, whether individual and/or team, considering criteria that strengthen the Occupational Health and Safety Management System Guidelines.

- **Violation:**

Action that deviates from rules and/or procedures formally established by the organization. Someone commits a violation when, while carrying out a task and of their own free will, they practice Unsafe Conduct and/or fail to comply with an Attitude for Life.

- **Error:**

That which results from a misunderstanding or lack of knowledge of formally established rules and/or procedures.

- **"5 Star Attitudes" Program:**

This is a program that recognizes actions and attitudes that achieve results above those established in goals or performances defined by the Unit.

- **Administrative Sanction for Unsafe Conduct and Attitudes for Life:**

Application of administrative sanctions on employees and/or service providers who expose themselves to risk situations by failing to comply with Occupational Health and Safety practices established at Klabin, which can be applied according to criticality.

- **Unsafe Conduct:**

Deviation from existing Occupational Health and Safety practices at Klabin. Examples of Unsafe Conduct:

- a) Failure to comply with directions on signposts in the sector.
- b) Failure to comply with area security procedures.
- c) Failure to use mandatory PPE.
- d) Disrespect of isolation, entering risk areas.
- e) Wearing jewelry during operations (earrings, chains, watches, rings, etc.).
- f) Using phones while handling tools or operating machinery and equipment, while driving company vehicles and while walking, going up or down stairs.

- **Attitudes for life:**

Non-negotiable attitudes, connected to Critical Activity Requirements (CARs). These are essential and non-negotiable values that serve to protect lives in our work.

- **Safe Decision:**

Situation in which the employee's activity is paused due to a risk situation or lack of knowledge, skills or correct tools to carry out the work. For example: not making a cut in a pipe before checking the product passing through the line and checking whether the area was cleaned and drained.

- **Critical Activity Requirements (CARs):**

These are minimum guidelines related to occupational health and safety requirements that ensure physical safety, health protection, and the preservation of people's lives when carrying out critical activities, as described in procedure COR-PRO-SSO-0019 - Critical Activity Requirements. The requirements are addressed from the following aspects: people, facilities, equipment, tools, and management procedures.

- **Unit Life Protection Management Committee:**

A group that may be created and will be made up of Unit managers who will be responsible for analyzing situations identified as subject to the application of disciplinary measures. If no such committee is set up, the decision must be made by the People and Management, Occupational Safety and Unit Manager team or their immediate substitute.

- **Safety Culture Hearts and Minds Method:**

Methodology created by Shell after research in the 1980s, 1990s and 2000s – and that continues to this day. A partnership between the Shell Group and the Energy Institute. The methodology reinforces that safe working environments are where accident rates are reduced, where the higher the engagement in safety, the lower the reactive indicators are, and vice versa. Hearts and Minds uses a culture scale to simplify and categorize these levels. This divides safety culture into five categories: 1) Pathological; 2) Reactive; 3) Calculative; 4) Proactive; 5) Generative.

- **Occupational Health and Safety Management System:**

The procedures, methodologies and health and safety objectives adopted by Klabin to protect people's health and safety.

- **Danger:**

Potential source of damage and/or injury.

- **Risk:**

Combination of the probability of damage occurring and its severity.

- **Action plan:**

Measures necessary to reduce the significance of the risk.

4. REFERENCES

- Klabin Code of Conduct
- Consolidation of Labor Laws – CLL
- COR-PRO-SSO-0001 – Classification of Accident Occurrences, Work Incidents and Occupational Illness
- COR-PRO-SSO-0005 – Daily Safety Dialogue (DSD)
- COR-PRO-SSO-0007 – Safety in Focus
- COR-PRO-SSO-0018 – Safety Report
- COR-PRO-SSO-0019 – Critical Activity Requirements
- COR-PRO-SSO-0034 – Occupational Health and Safety Management System Requirements
- COR-PRO-SSO-0065 – Recognition of Safe Activities and Risk Alert Dialog – RADAR
- COR-PRO-SSO-0067 – Guidelines and Governance for Occupational Health and Safety Culture
- COR-PRO-SSO-0083 - 5 Star Attitude Recognition Program
- COR-PRO-SSO-0084 - Registration and Communication of Breaks in Attitudes for Life
- Hearts and Minds Safety Culture – Energy Institute / Shell
- ISO 45001
- Law 6514/77 – Ordinance 3214/78 – Regulatory Standards – NR.

5. RESPONSIBILITIES

- **Executive Board**

- Approve DE Policies.

- **Designated Board**

- Submit to the DE proposals for DE Policies and Procedures and Technical Standards in compliance with the recommendations of the CA and DE, as applicable;
- Develop and propose the creation, amendment or revocation of DE Policies, Procedures and Technical Standards;
Disseminate and train target audiences in relation to DE Policies, Procedures and Technical Standards.

- **Corporate Management and Occupational Safety**
 - Define, make available, and periodically review this policy;
 - Disclose this document to all Units;
 - Ensure that the Units minimally follow the recommendations indicated in this document.

- **Purchasing Management**
 - Be aware of this policy and attach it to contracts signed with service providers, so that it is part of the contracted company's obligations.

- **Corporate Legal Management**
 - Be aware of this policy;
 - Support in the construction of the Policy and its application, mitigating risk for the company.

- **Integrity Management**
 - Be aware of this policy;
 - Provide guidance on any complaints or information relating to this topic.

- **People and Management**
 - Be aware of this policy;
 - Assist in the dissemination of this Life Protection in Occupational Health and Safety (OHS) Policy;
 - Integrate the Life Protection Management Committee in decision-making;
 - Manage evidence arising from Unsafe Conduct and Attitudes for Life.

- **Klabin Managers**
 - Provide resources for this policy to be implemented;
 - Encourage educational learning with your team leadership. Through the practice of the actions established in this policy.

- **Area Coordinators / Supervisors and other Leadership**
 - Communicate the Policy to all employees;
 - Formally recognize employees, individually or in groups, according to criteria established in the unit's 5-Star Attitudes Recognition Program;
 - Apply Administrative Sanctions to those led, when there is non-compliance with Occupational Health and Safety practices established at Klabin;
 - Share Policy data and periodically generate learning with those you lead.

- **Local OHS Manager**
 - Report the progress and performance of this policy to the Corporate OHS, serving as a comparison of best practices in the company;
 - Periodically analyze preventive indicators of employee behavior in the Unit and present those considered at risk and repeat offenders to Management.

- **Employees and Outsourced Workers**
 - Be aware of this policy by formalizing receipt and reading it through a duly signed document;
 - Follow the Safe Work Procedure for the Valuing Life: a gesture of care culture;

- Identify deviations that may occur in relation to the company's OH&S rules, proposing improvements;
 - Actively participate in the Unit's OH&S program.
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 - Develop and propose the creation, amendment or revocation of DE Policies, Procedures and Technical Standards;
 - Disseminate and train target audiences in relation to DE Policies, Procedures and Technical Standards.
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6. PREMISES

The Life Protection Policy seeks to identify, evaluate, control, prevent and minimize the dangers and risks in processes and activities, analyzing the consequences for people's health and safety, considering the safety of facilities and the organization's image, in accordance with the procedures that make up the Occupational Health and Safety Management System. Furthermore, it aims to direct investments on the topic according to the degree of importance and prioritization of the identified risks.

This Policy also provides educational content for all Employees and Outsourced workers in Klabın and defines the practice of Recognition of safe behaviors and the process that leads to Administrative Sanctions for Unsafe Conduct and Non-compliance with an Attitudes for Life.

To achieve the objective of this policy, risks in work environments are assessed and control measures are defined according to risk priority, establishing action plans for their elimination or mitigation.

7. SECURITY REQUIREMENTS

Not Applicable.

8. SOCIAL AND ENVIRONMENTAL RECOMMENDATIONS

Not Applicable.

9. GUIDELINES

9.1. Implementation of the Recognition Program

The 5 Star Attitude Recognition Program is standardized according to the COR-PRO-SSO-0083 procedure - 5 Star Attitude Recognition Program, and its purpose is to encourage collaboration, the appreciation of people and the improvement of work environments, enhancing safe practices and tools of the Occupational Health and Safety Management System (SGSSO).

9.2. Administrative Sanctions

This deviation management practice aims to educate own and contracted employees in the Company's values.

Any deviation in relation to Safety may result in the application of an administrative sanction, which may be classified as Unsafe Conduct or non-compliance with Attitudes for Life.

The Unit will consider Annex I – Deviation Analysis Flow, to then recommend the level of application of the administrative sanction.

Administrative Sanctions for Unsafe Conduct and Attitudes for Life					
Criticality	Potential	Sequence	Employee *¹	Outsourced Employee	In charge
Unsafe Conduct	Light	1 st time	Verbal warning + guidance	Formal notification to the company + evidence of guidance to those involved	Leadership, Area Coordinator --- Technical Manager, for in outsourced employees
		Repeat	Written warning + guidance	Formal notification to the company + Fine provided for in contract	
	Serious	1 st time	Written warning + guidance	Formal notification to the company + Fine provided for in contract	
		Repeat	7 day suspension + retraining	Blocking physical access for the Contractor's Employee to Klabin units for 7 days + Fine provided for in the contract	
Attitudes for Life	Very serious	1 st time	7-day suspension + retraining or immediate dismissal	Blocking physical access for the Contractor's Employee to Klabin units for 7 days + Fine provided for in the contract	Unit's Life Protection Management Committee will discuss the sanction* ³
		Repeat	Immediate dismissal* ²	Blocking physical access for the Contractor's Employee to Klabin units for 24 months + Fine provided for in the contract	

*¹ - depending on the employee's history, disciplinary sanction greater than that provided for in the table above may be applied.

*² - depending on the analysis carried out, validated by the Legal and People & Management areas, dismissal may be a possibility.

*³- Life Protection Management Committee: Committees that can be created in the units.

- **Unsafe Conduct:**

The sanction must be applied in sequence, depending on the nature of the deviation. If the employee is a repeat offender, the administrative sanction must be progressive, that is, greater than the previous one, except for cases of non-compliance with Attitudes for Life, in which Termination of the Employment Contract may be directly applied.

1. **Verbal Warning:** The immediate leader must discuss the deviation, emphasize why the Safety Instructions are important, and get the employee's commitment to their safety, in addition to that of their colleagues. Complete Appendix II. The immediate leader of the employee warned must send evidence of the Verbal Warning to be filed with the employee's documentation in the People and Management area.
2. **Written Warning:** The immediate leader must review the facts with the employee warned. The occurrence/absence or deviation must be documented, succinctly writing the facts that led to the sanction, so that the employee knows they are being warned. Complete Appendix II and collect the signature of the employee warned. The immediate leader of the employee warned must send evidence of the Written Warning to be filed with the employee's documentation in the People and Management area.
3. **Suspension:** The immediate leader of the suspended employee must, after alignment with the People and Management Area, review the facts with the suspended employee. Document the occurrence/absence or deviation, succinctly writing the facts that led to the suspension and determining the number of days of unpaid absence. Complete Appendix III and collect the signature of the suspended employee. The immediate leader of the suspended employee must send evidence of the Administrative Sanction Term to be filed with the employee's documentation in the People and Management area.
4. **Dismissal:** A repeat offender, or one who committed a mistake/deviation that put his or her life or the lives of third parties at risk, or even one who failed to comply with an Attitude for Life, may have their employment contract terminated.

Note 1: Depending on the occurrence and conduct evaluated by the unit's Life Protection Management Committee, dismissal for just cause may be carried out upon prior approval with the legal and People and Management team.

The principle of immediacy of the sanction must be applied, except when the investigation of the facts requires longer investigation.

Every warning, whether verbal or written, must be signed by the person being warned, or when the person refuses, it must be signed by two witnesses who are aware of the unsafe conduct, in addition to their immediate superior.

For Unsafe Conduct, the immediate manager will be responsible for evaluating and applying the Administrative Sanction, with the support of their Manager.

- **Attitudes for Life**

In the event of deviations from Attitudes for Life, the Life Protection Management Committee will ensure confidentiality for those involved, continue with the process, and support decision-making. This decision shall be formalized by a representative of the Committee to the area manager for the application of disciplinary measures.

Appendix I – Analysis of Deviation Flow will lead to the recommendation for treatment.

Below are the 5 Klabin LIFE Attitudes, derived from the Klabin Critical Activity Requirements (CARs):

- **RAC – Power Shut-off**

Comply with the power shut-off (shut-off, zero power test, and subsequent switching back on) whenever intervening with machines, equipment, and installations, except when there is a standard that allows the activity with the machine / equipment still switched on.

Attitude for Life description: "Shut off the power whenever you need to intervene in machines, equipment, and facilities."

➤ **CAR – Cargo Lifting**

Mark the location where the load will be lifted.
Never move or work on or under a suspended load.
Only operate an Overhead Crane if you are duly qualified with the Klabin seal on your badge.

Attitude for Life description: "Always indicate the location where the load will be suspended. It is prohibited to move or work on or under suspended loads."

➤ **CAR – Confined Spaces**

Access a confined space only if you have a Work Permit to do so and the respective up-to-date training.

Attitude for Life description: "When accessing a confined space, you must have a Work Permit and the respective up-to-date training."

➤ **CAR – Machine Movement**

Operate equipment only with appropriate qualifications and training.
Always operate a forklift in reverse when transporting any material that impedes visibility.

Attitude for Life description: "Operate equipment only if you are trained or have adequate qualifications. And always operate a forklift in reverse when transporting any material that impedes your visibility."

➤ **CAR – Working at Height**

Be duly qualified and use a safety belt with lanyards properly secured when working above 2 meters in height.

Attitude for Life description: "Be qualified and use a harness which must be securely anchored when working above two meters in height."

9.3. Life Protection Policy monitoring

The Life Protection Policy applied at Klabin must be evaluated whenever organizational changes occur that may influence its application. Based on this assessment, the occupational safety area should propose adjustments if necessary and improvements in the application of the policy.

9.4. Validity of Administrative Sanctions

For the purposes of evaluating recurrence, disciplinary measures applied as a result of deviations related to Attitudes for Life will expire within 2 years, counting from the date of registration of the last occurrence.

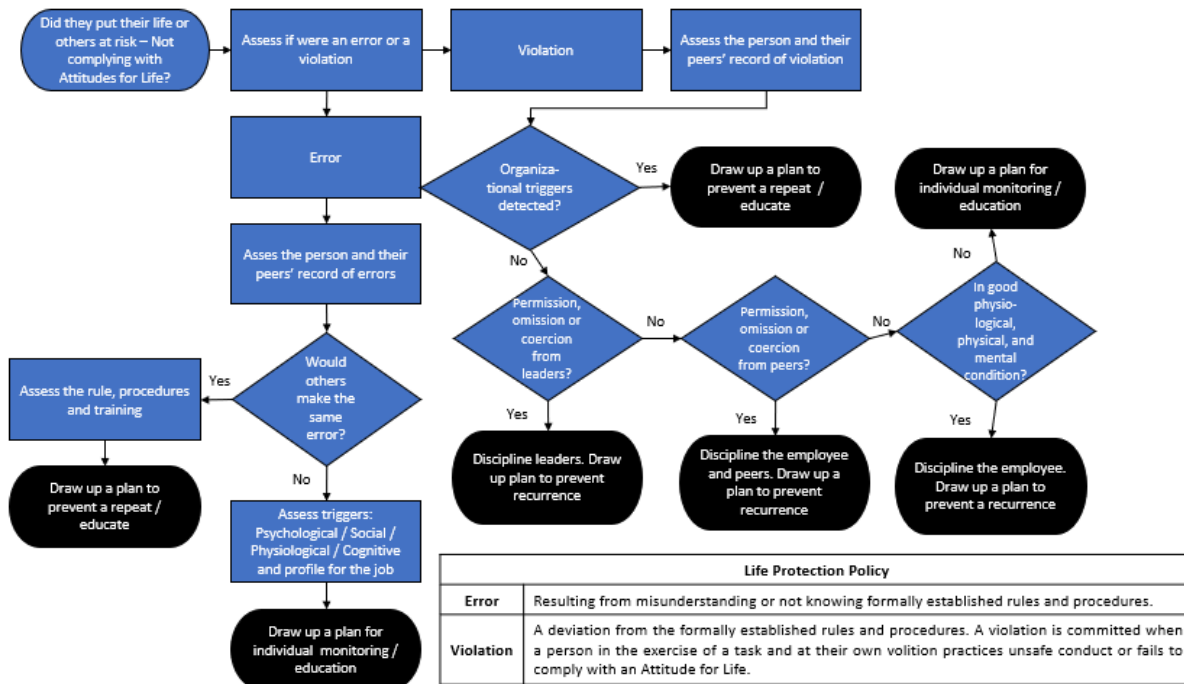
10. RECORDS CONTROL

The record regarding Attitudes for Life is carried out in the Klabin Occupational Health and Safety Information System and the indicators are managed in Power BI, as described in Procedure COR-PRO-SSO-0084 - Registration and Communication of Breaks in Attitudes for Life.

Registration and monitoring of the recognition program must be carried out as described in procedure COR-PRO-SSO-0083 - 5-Star Attitude Recognition Program.

11. ANNEXES

11.1 - Appendix I – Analysis of Deviations Flow.



Life Protection Policy	
Error	Resulting from misunderstanding or not knowing formally established rules and procedures.
Violation	A deviation from the formally established rules and procedures. A violation is committed when a person in the exercise of a task and at their own volition practices unsafe conduct or fails to comply with an Attitude for Life.

11.2 – Appendix II – Warning form model.

WARNING

From:

(Responsible for presenting the warning)

To:

(Name of employee warned)

Warned Employee Registration: _____

Verbal warning

Written warning

You have received a disciplinary sanction as indicated above because your conduct was not consistent with the policies and standards in the Occupational Health and Safety Management System, which is mandatory for all Klabin employees, as below:

As a result, you are hereby warned that the attitudes described above are not permitted at Klabin and that, if a repeat offense occurs, this may result in the termination of your employment contract.

Location, Date

_____, _____

(Name and Signature of the person responsible for presenting the warning)

(Name and Signature of the Employee Warned)

Witness 1:

Witness 2:

11.3 – Appendix III – Suspension model form.

SUSPENSION

From:

(Responsible for presenting the suspension)

To:

(Name of suspended employee)

Suspended Employee Registration: _____

Occurrence: After the investigation and investigation of the occurrence on the date of ____/____/____ at the time of ____: ____, it was evident that you

Disciplinary sanction: Considering that the occurrence described above constitutes serious misconduct on the part of the EMPLOYEE, the EMPLOYER, based on art. 482 of the Labor Act (CLT), hereby resolves by this instrument, to SUSPEND the person concerned for _____ days. This disciplinary measure, in the event of a repeat of this behavior, or another type of serious misconduct, does not preclude the application of other disciplinary measures.

Location, Date

_____, _____ from _____ from _____

(Name and Signature of the Person Responsible for presenting the Suspension)

(Name and Signature of Suspended Employee)

Witness 1:

Witness 2:

12. APPROVAL OF THE DOCUMENT

Authorship/Review: Flavio Henrique Furtado

Preparation/Edition: Daiana Martins Moraes - 16/07/2024 - 16:22:36

Consensus: Paulo Licciardi - 17/07/2024 - 07:07:20; Nei Vilha Dias - 17/07/2024 - 10:24:45

Approval: Flavio Henrique Furtado - 17/07/2024 - 16:44:57; Nei Vilha Dias - 18/07/2024 - 11:04:31; Ana Cristina Barcellos Rodrigues - 18/07/2024 - 14:10:16