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	<b>PROTECTION OF LIFE</b>	April 2022 Page 1/12

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## **1. OBJECTIVE**

To ensure the physical integrity of the Direct and Indirect Employees, through the underscoring of Recognition of safe attitudes and management of administrative sanctions, thus strengthening the management for safe behaviors through a process of education in safety.

To establish the minimum criteria for the preparation and implementation of Klabin's Protection of Life Policy.

## **2. COVERAGE**

This policy applies to all direct and indirect employees of Klabin S.A., its subsidiaries and affiliates.

## **3. DEFINITIONS**

- **Recognition:**

An existing practice in the Unit for strengthening examples of safe behavior, whether as an individual and/or a team, considering criteria which enhances the Occupational Health and Safety Management System.

- **Violation:**

An action which deviates from the rules and/or procedures formally established by the organization. Someone who commits a violation when in the exercise of a task and of their own free will, practices Unsafe Conduct and/or fails to comply with an Attitude for Life.

- **Error:**

That which results from a mistaken understanding or ignorance of the formally established rules and/or procedures.

- **"5 Stars Attitudes" Program:**

The 5 Stars Attitudes recognition program considers actions and attitudes subject to recognition, those that conduct a result above that established in goals or performance set by the Unit.


- **Administrative Sanction for Unsafe Conduct and Attitudes to life:**

Imposition of an administrative sanction on the employee and/or service provider that exposes themselves to risk situations thereby infringing the Occupational Health and Safety practices established by Klabin, to be imposed in accordance with the degree of criticality.

- **Unsafe Conduct:**

Infringement of the Occupational Health and Safety practices adopted by Klabin. Examples of Unsafe Conduct:

- a) Failure to observe guidance signage in the sectors.
- b) Failure to comply with safety procedures of the area.
- c) Failure to use mandatory PPE.
- d) Disrespect of restricted access, entering areas of risk.

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- e) Use of personal adornments (earrings, necklaces, watches, rings, etc.).
- f) Use of mobile phones while handling tools or operating machines and equipment, while driving company vehicles and while climbing or descending ladders.

- **Attitudes to life:**

A set of non-negotiable Attitudes, connected to Critical Activity Requirements - CARs. These are essential and non-negotiable values which serve to protect lives in our working environment.

- **Safe Decision:**

Situation in which the employee's activity is paused due to a risk situation or lack of knowledge, skill, or correct tools for undertaking the work. Example: not executing the cutting of piping before verifying what product passes along the line and checking that cleaning and drainage has been completed at the particular location.

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

These are minimum guidelines related to the requirements of occupational health and safety which assure the physical integrity, protection of health and preservation of life of the people in the execution of critical activities as described in the COR-PRO-SSO-0019 –Critical Activity Requirements procedures. The requirements cover the following aspects: people, installations, equipment, management tools and procedures.

- **Protection of Life Management Committee:**


A Group which may be created in the future and constituted by managers from the Unit and responsible for analyzing situations identified as subject to eventual disciplinary measures. Should it be decided not to set up the committee, the decision shall be taken by the People and Management team, Occupational Safety and Manager of the unit or their immediate substitute.

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

Methodology originated in Shell based on research carried out in the 1980s, 1990s and 2000s – and which is still going on today via a partnership between the Shell Group and the Energy Institute. The methodology reinforces the idea that the safest workplace environments are those that operate pari passu with reducing accident rates, whereby the greater the engagement of all in safety the less the reactive indicators will be and vice versa. Hearts and Minds uses a culture scale for simplifying and categorizing these levels of engagement, dividing the safety culture in five categories: 1) Pathological; 2) Reactive 3) Calculative; 4) Proactive; 5) Generative.

#### **4. REFERENCES**


- Klabin Code of Conduct;
- Consolidated Labor Laws – CLT;
- COR-PRO-SSO-0001 – Classification of Occurrences of Accidents, Work-Related Incidents and Occupational Illness;
- COR-PRO-SSO-0005 – Daily Safety Dialog DDS;
- COR-PRO-SSO-0007 – Safety in Focus;
- COR-PRO-SSO-0018 – Safety Report;
- COR-PRO-SSO-0019 – Critical Activity Requirements;
- COR-PRO-SSO-0034 – Requirements of the Occupational Health and Safety Management System;

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- 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;
- Hearts and Minds Safety Culture – Energy Institute / ShellG
- ISO 45001;
- Law 6514/77 – Ordinance 3214/78 – Regulatory Norms – NR.

## **5. RESPONSIBILITIES**

- **Corporate and Occupational Safety Unit**
  - Decide, publish, and revise this policy periodically;
  - Disseminate this document to all Units;
  - Ensure that the units follow at least to the letter the recommendations in this document.
- **Klabin's Management**
  - Take cognizance, evaluate, and request revisions;
  - Approve this policy in a management meeting.
- **Procurement Unit**
  - Take cognizance of this policy;
  - Attach the policy to the agreements with service providing companies, so that it is part of the contracted company's obligations.
- **Legal Unit**
  - Take cognizance of this policy;
  - Support the construction of the policy and its application, mitigating risk for the company.
- **Integrity Unit**
  - Take cognizance of this policy;
  - Ensure that eventual complaints or information on this theme are sent to the appropriate addressees.
- **People and Management**
  - Take cognizance of this policy;
  - Assist with the disclosure of this Protection of Life Policy in Occupational Health and Safety (OHS);
  - Integrate the Protection of Life Management Committee in the decision-making process;
  - Manage the evidence arising from Unsafe Conduct and Attitudes to Life.
- **Klabin's Managers**
  - Provide the sources so that this policy can be implemented;
  - Encourage educative learning putting this tool into practice with your leadership team;
- **Area Coordinators/Supervisors and other Leadership Personnel**
  - Disclose the Policy to all your leadership personnel;
  - Formally recognize your staff individually or in a group for their performance, according to the criteria established by the unit's 5-Stars Recognition Attitudes Program;

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- Impose Administrative Sanctions on the employees in your team;
- Manage actions with your team involving statistical data on recurring infringements analyzed using the preventive tools of your area;
- Periodically raise the awareness of employees in your team.

- **Responsible for local OHS**

- Report to the Corporate OHS the progress and performance of this Policy, for comparative purposes, the best practices in the company being the yardstick;
- Periodically analyze indicators of preventive behavior in the Unit and present to Management recurring risk behavior for a solution.

- **Direct and Indirect Employees**

- Take cognizance of the policy formally signing the document acknowledging communication of the same;
- Follow the Safe Working Procedure with relation to the Valorizing Life culture: a gesture of care;
- Point out divergences that may occur in relation to the OHS rules of the company proposing actions for improvement;
- Participate actively in the Unit's OHS program.

## **6. ASSUMPTIONS**

Not applicable.

## **7. GUIDELINES – DESCRIPTION OF THE ACTIVITIES**


Protection of Life Policy provides an educative content directed at all Klabin's Direct and Indirect Employees. It must include the practice of Recognition for safe behavior and conversely, a process which leads to Administrative Sanctions for Unsafe Conduct and Attitudes to life.

The Unit shall consider Attachment I – Flow for Analysis of Infringements, and for then to recommend what level of administrative sanction to be imposed.

### **7.1. Implementation Program of Recognition**

The 5 Stars Attitudes Recognition Program at the Unit must strengthen the tools of the Occupational Health and Safety Management System (OHSMS). In addition, Team and/or Individual and/or Leadership recognition practices which promote the building of a safe environment and one favorable to the organizational climate:

- Recognition by the management and/or by the direct and/or indirect employees so that the behavior becomes a model and a standard for the area, team and/or manufacturing plant as a whole. Recognition may be manifested through routine events at the units such as for example: Individual Feedback, Daily Safety Dialog, Safety in Focus, Risk Alert Dialog - RADAR, Meetings of the Safety Committees, Line Meetings, CIPA Meetings, Production Meetings, 'Superar' Meetings, COMSECON Meetings, Managerial Meetings, etc.

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## 7.2. Administrative Sanctions for Unsafe Conduct and Attitudes for life – Implementation:

This practice of managing infringements has the purpose of educating Direct and Indirect Employees in the Company's values.

Any infringement in relation to Safety may generate an administrative sanction, potentially being classified as Unsafe Conduct or non-compliance with one of the Attitudes for Life.

<b>Administrative Sanctions for Unsafe Conduct and Attitudes for Life</b>					
<b>Criticality</b>	<b>Potential</b>	<b>Sequence</b>	<b>Direct Employee*<sub>1</sub></b>	<b>Indirect Employee</b>	<b>Responsible</b>
<b>Unsafe Conduct</b>	Light	1 <sup>st</sup> time	Verbal warning + guidance	Formal notification to the company + evidence of guidance being given to the involved personnel	Leadership of the Involved Personnel, Area Coordinator
		Repeat occurrence	Written warning + guidance	Formal notification to the company + Fine as set forth in contract	
	Serious	1 <sup>st</sup> time	Written warning + guidance	Formal notification to the company + Fine as set forth in contract	--- Technical Manager in the case of an Indirect Employee of an Outsourced Company
		Repeat occurrence	Suspension for 7 days +retraining	Blocking physical access of the Employee of the Outsourced Company to Klabin's units for 7 days + Fine as set forth in contract	
<b>Attitudes for Life</b>	Extremely Serious	1 <sup>st</sup> time	Suspension of 7 days +retraining or summary termination	Blocking physical access of the Employee of the Outsourced Company to Klabin's units for 7 days + Fine as set forth in contract	Protection of Life Management Committee of the Unit will decide on sanction*3
		Repeat Recurrence	Summary termination*2	Blocking physical access of the Employee of the Outsourced Company to Klabin's units for 24 months + Fine as set forth in contract	


\*1 - depending on the employee's record, a disciplinary sanction may be imposed which is higher than set forth in the above table.

\*2 - depending on the analysis, validated by the Legal and People & Management areas, the option may be for termination with cause.

\*3 – Protection of Life Management Committee: Committees which may be created in the units.

### • **Unsafe Conduct:**

Sanctions must be applied in sequence according to the nature of the infringement. If the employee commits a further infringement, the administrative sanction must be progressive, that is greater than the previous sanction,

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except for cases of non-compliance with the Attitudes for Life, in which case the termination of the Labor Contract may be directly applied.

1. **Verbal Warning:** The immediate Leader shall discuss the infringement, emphasizing why the Safety Instructions are important, obtain the commitment from the employee with their own Safety, as well as that of their colleagues. Complete Attachment II. The immediate Leader of the employee receiving a warning shall send evidence of the Verbal Warning for filing together with documentation of the employee held with the People and Management area.
2. **Written Warning:** The immediate Leader shall review the facts together with the employee subject of the warning. Document the occurrence/misconduct or infringement, writing succinctly the facts that have led to the sanction so that the employee knows why he is being warned. Complete Attachment II and obtain the signature of the employee who has received the warning. The immediate Leader of the employee receiving a warning shall send evidence of the Written Warning for filing together with documentation of the employee held with the People and Management area.
3. **Suspension:** The immediate Leader of the suspended employee, having aligned with the People & Management Area, shall review the facts with the suspended employee. Document the occurrence/misconduct or infringement, writing succinctly the facts leading to the suspension determining the number of days of unremunerated absence. Complete the Attachment III and obtain the suspended employee's signature. The suspended employee's immediate Leader shall send evidence of the Administrative Sanction's Agreement for filing with the employee's documentation held with the People & Management area.
4. **Termination:** The employee who is a repeat offender or who has committed misconduct/ infringement which has placed their own life at risk or that of others or again who has failed to comply with an Attitude for Life, may have their work contract rescinded.

**Nota 1:** Depending on the occurrence and the conduct evaluated by the unit's Protection of Life Management Committee, the employee's labor contract may be terminated with cause contingent on prior approval of the Legal and People & Management teams.

The principle of immediacy of the sanction should be applied, except when verification of the facts requires longer investigation;


All warnings, whether verbal or written, should carry the signature of the employee who has been warned, or when this is refused, shall be signed in the presence of two witnesses that are aware of the unsafe conduct, in addition to their immediate superior.

In the case of Unsafe Conduct, the immediate Manager with the support of their Leader shall be responsible for the evaluation and application of the Administrative Sanction.

- **Attitudes to Life**

In the event of infringement of Attitudes for Life, the Protection of Life Management Committee, shall guarantee confidentiality to the involved employee, proceed with the process, and shall provide information for substantiating a decision. This decision shall be formalized by a representative of the Committee to the manager of the area for the latter to adopt the disciplinary measures.

Attachment I – Flow for Analysis of an Infringement will provide the recommendations as to the way the matter is to be handled.

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Below are Klabin's 5 Attitudes for LIFE, based on Klabin's Critical Activity Requirements (CAR):

➤ **CAR – Blocking of Energy**

Comply with energy blocking sequence (blocking, zero energy test and subsequent unblocking) whenever machines, equipment and installations require some form of mechanical intervention except where there is a standard that allows the activity to take place with the machine/equipment still energized

*Description of the Attitude for LIFE: "Block the energy whenever you need to intervene in machines, equipment and installations".*

➤ **CAR – Hoisting of Loads**

Signal the place where the load is to be suspended.  
Never transfer or work on or under a suspended load.  
Only operate an Overhead Crane if you are duly licensed with the Klabin seal on your employee badge.

*Description of the Attitude for LIFE: "Always signal the place where the load is to be suspended. It is not permitted to walk or work on or underneath a suspended load".*

➤ **CAR – Confined Space**

Access a confined space only if you have Work Permission (WP) and the respective training for the task is current.

*Description of the Attitude for LIFE: "On accessing a confined space, you should have Work Permission (WP) and the respective training for the task should be current".*

➤ **CAR – Machinery in Movement**

Operate equipment only when duly licensed and adequately trained.  
Operate a forklift truck only in reverse when transporting any material which impedes visibility.

*Description of the Attitude for LIFE: "Operate equipment only if you are trained to do so, licensed, or have adequate skills. And operate a forklift truck always in reverse when carrying any material that impedes your visibility".*

➤ **CAR – High Level Working**

To be duly authorized and to use a safety belt with safety straps anchored for work more than 2 meters high.

*Description of the Attitude for LIFE: "Be authorized and use a safety belt with safety straps that need to be securely anchored for working more than 2 meters high".*



### 7.3. Monitoring of the Protection of Life Policy

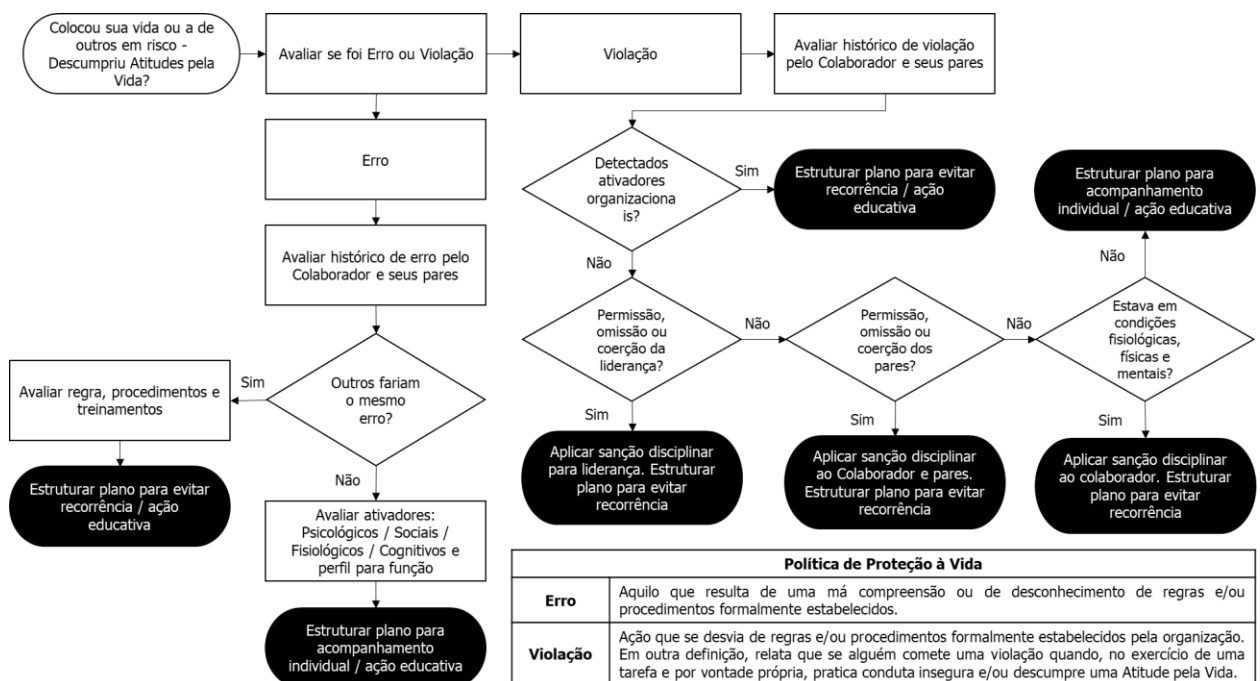
Protection of Life Policy in force at Klabin shall be evaluated whenever organizational changes occur that may have an influence on its application. On the basis of this evaluation, the work safety area should propose adjustments if necessary and improvement in the implementation of the policy.

### 7.4. Validity of the Administrative Sanctions


For the purposes of evaluating recurring infringements, the disciplinary measures applied with respect to infringements of Attitudes for Life, shall expire after two years as from the date of the last occurrence.

## 8. ATTACHMENTS

### 8.1 - Attachment I – Flow for Analysis of Infringements.



Política de Proteção à Vida	
<b>Erro</b>	Aquilo que resulta de uma má compreensão ou de desconhecimento de regras e/ou procedimentos formalmente estabelecidos.
<b>Violação</b>	Ação que se desvia de regras e/ou procedimentos formalmente estabelecidos pela organização. Em outra definição, relata que se alguém comete uma violação quando, no exercício de uma tarefa e por vontade própria, pratica conduta insegura e/ou descumpra uma Atitude pela Vida.

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**8.2 - Attachment II – Model form for warnings.**

**NOTICE OF WARNNG**

From: \_\_\_\_\_  
(Responsible for reporting the Warning)

To: \_\_\_\_\_  
(Name of Warned Employee)

Registration of Warned Employee: \_\_\_\_\_

- Verbal warning
- Written warning

We hereby notify that a disciplinary sanction has been imposed on you as shown above, since you have committed infringements of behavior in non-conformity with the policies and rules of the Occupational Health and Safety Management System, mandatory for all Klabin’s employees, among them:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

In the light of this, you are hereby warned that attitudes described above are not permitted at Klabin and that any recurrence may result in the rescission of your labor contract.

Place, Date

\_\_\_\_\_, \_\_\_\_\_ de \_\_\_\_\_ de \_\_\_\_\_


\_\_\_\_\_  
(Name and Signature of the Responsible for the Warning)

\_\_\_\_\_  
(Name and Signature of the Warned Employee)

Witness 1: \_\_\_\_\_

Witness 2: \_\_\_\_\_

\_\_\_\_\_

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**8.3 - Attachment III – Model form for suspension.**

**NOTICES OF SUSPENSION**

From: \_\_\_\_\_  
(Responsible for reporting the suspension)

To: \_\_\_\_\_  
(Name of suspended Employee)

Registration of suspended employee: \_\_\_\_\_

**The occurrence:** Following investigation and verification of an occurrence on \_\_\_\_/\_\_\_\_/\_\_\_\_  
at (time)\_\_\_\_\_:\_\_\_\_\_, there is evidence that you

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Disciplinary sanction:** Considering that the occurrence described above constitutes serious misconduct on the part of the EMPLOYEE, the EMPLOYER, based on Article 482 of the CLT, by this act and through this instrument, SUSPENDS you, for\_\_days. Should there be a recurrence of this behavior, or further serious misconduct arise, this disciplinary measure does not invalidate the imposition of other disciplinary measures.

Place, Date


\_\_\_\_\_, \_\_\_\_\_ xx/xx/ 20xx \_\_\_\_\_

\_\_\_\_\_  
(Name and Signature of the Party Responsible for presenting the Suspension)

\_\_\_\_\_  
(Name and Signature of the Suspended Employee)

Witness 1:  
\_\_\_\_\_

Witness 2:  
\_\_\_\_\_





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## 9. APPROVAL OF THE DOCUMENT





	<b>Aprovações de Políticas e Procedimentos</b>	ID Solicitação APP.22.000009





Emitente	Área	Data de Abertura
Gustavo Roberto Frezarini	10404333 - COORDENACAO CONTROLES INTERN	27/04/2022  





Área	Nome da Política ou Procedimento	
Segurança do Trabalho	Política de Proteção à Vida (Abril 2022)	
Tipo do Documentos	Versão	Quantidade de Aprovadores
Política	00	05
Observação		
Primeira Versao da Política de Proteção a Vida. Documento Elaborado por Adriano Campos da Silva. Este documento foi aprovado pelos respectivos executivos indicados a seguir e entra em vigor na data de sua publicação. Em anexo, ata da aprovação do documento em Reunião de Diretoria.		

Aprovador	Área	Data de Aprovação	Data de Reprovação
Nei Vilha Dias	10404333 - COORDENACAO CONTROL	27/04/2022  	 
Observação			
De acordo.			

Aprovador	Área	Data da Aprovação	Data da Reprovação
Adriano Campos da Silva	10404211 - SEGURANCA DO TRABALH	27/04/2022  	 
Observação			
De acordo, vamos em frente!			

Aprovador	Área	Data da Aprovação	Data da Reprovação
Cristiano Monteiro Bueno	10403152 - RISCOS E CONTROLES INT	27/04/2022  	 
Observação			
De acordo.			
10/4000			

Aprovador	Área	Data da Aprovação	Data da Reprovação
Flavio Henrique Furtado	10403158 - GERENCIA SEGURANCA DC	27/04/2022  	 
Observação			
de acordo			

Aprovador	Área	Data da Aprovação	Data da Reprovação
Ana Cristina Barcellos Rodrigues	10401676 - DIRETORIA GENTE E SERVI	04/05/2022  	 
Observação			
de acordo			