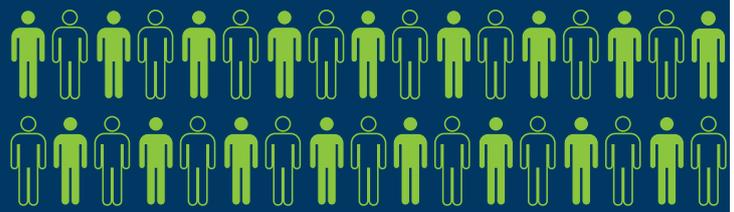


CODE OF  
CONDUCT



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## MESSAGE FROM THE MANAGEMENT

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Papirus has worked with commitment and ethics to create valuable relationships where everyone will benefit. That includes not only our employees, customers and partners, but also the community and the environment where we operate. As result of such care, we have across the years, consolidated our image as a respectable company. Flexible in relationships and solutions, stricter in character. As result of our attitudes, we have come this far being proud of who we have become. Always working with respect towards people.

This Code of Conduct is a reinforcement of the way we are and act. Now, by having our guidelines in writing, we expect that we will move forward for many years being an admirable company. With a decent work environment and great relationships with our partners. A company that builds valuable relationships.



## INTRODUCTION

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More than recycling, what Papirus actually does, is transformation. The raw material of our processes enables the company to stay in touch with many people. Waste collector coops, consumers, print shop directors and employees that directly or indirectly connect with our products. People that transform lives with their work, representing our brand and building our image for society.

### WHAT IT IS

Papirus is presenting what we expect from the people that make the company operate in their day to day in our Code of Conduct. Therefore, it reinforces the way we act, explaining what it means to have ethical and responsible conduct. By reading the code, we would like to invite you to act according to the Papirus values. To increasingly transform paper and lives.

### WHAT IT IS FOR

Papirus values ethical and transparent business conduct that values people and respects the environment. Thus, Papirus wishes to create long-lasting and beneficial relationships among all people involved in processes, i.e. consumers, employees, partners, suppliers or shareholders.

This Code contains general code of ethics guidance that must be complied with by all Papirus members, regardless of their job position or roles. The Papirus employees must also be aware that anti-ethical conduct must not be part of the chain in a way that it would jeopardize company image in society as a whole.

### WHO IT IS FOR

The principles contained in this Code apply to all employees and stakeholders, internal or external.

Ethical conduct is the raw material to create **valuable relationships** that make our business happen.



## WHERE DOES OUR CODE OF CONDUCT COME FROM

The Papyrus Code of Conduct is based on company beliefs. Each expectation of the behaviors contained herein is somehow related to our values and our way of working with safety and quality in the most encompassing aspect of these words. Therefore, the following documents you already know guide this code:

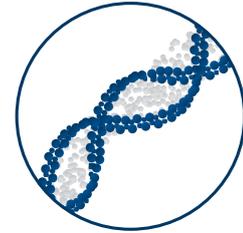
### BRAND ATTRIBUTES



**Flexibility**



**Valuable Relationships**



**Transformative DNA**

### CORPORATE PHILOSOPHY

The Code of Conduct is based on our reason for being, our principles and purpose.

### QUALITY POLICY

Our Quality Policy is also present in the content herein, supported by the following commitments:

- Customer Satisfaction
- Appreciation of Individuals
- Continuous Improvement
- Environmental and Social Concern
- Complying with Requirements

### ENVIRONMENTAL RESPONSIBILITY POLICY

The Environmental Policy, that Papyrus commits to through the certified sources of raw material, were also considered in the drafting of this Code.

## PAPIRUS CONDUCT COMMITMENT

### FSC® INPUTS PURCHASE POLICY

When undertaking on the FSC® Inputs Purchase Policy, Papirus is committing to continuously pursue the purchase and use of FSC® certified raw materials from controlled sources for its products, aware that material does not come from:

- Wood from illegal exploitation;
- Wood harvested that led to a violation of civil and traditional rights;
- Wood harvested in forests whose high preservation value attributes are threatened by management activities;
- Wood from forests whose lands are being converted to plantations or for non-forestry use;
- Wood from forests in which genetically modified trees were planted.
- Ensuring that post-consumer recovered material comes from trade, retail, merchants, plants, institutions, and residential collection networks.

### CORPORATE PHILOSOPHY

For Papirus, taking care of the environment is not just an obligation. It is part of our business. When we transform recycled raw material into new ones, we are making the best out of the environment. When we purchase inputs from other suppliers we also have to trust that they do not harm our values and follow the FSC® Inputs Purchase Policy.

### SOCIAL RESPONSIBILITY

The Papirus business is part of a complex network that involves not only company direct employees, but also suppliers, partners, customers and waste collector cooperatives. Therefore, in addition to contributing with the social projects promoted by the company, having social responsibility means working every single day to ensure that the relationships with these partners are beneficial for all parties.

#### • CHILD, FORCED AND COMPULSORY LABOR

Papirus opposes child labor and forced labor in any area of its production process. Therefore, each employee has the duty of blowing the whistle on any practice they may become aware of in that sense, placing ethics above the entire chain. That also means that we look for reliable suppliers and partners that follow the same ethical principles of Papirus.

#### • OCCUPATIONAL HEALTH AND SAFETY

At Papirus, people's health and safety is everyone's responsibility. As the company provides personal protective equipment, as well as establishes processes and rules to prevent harm to people's health, it is each person's responsibility to use such equipment and follow the rules and safe processes. Upon finding a risky situation, it is also each person's responsibility to act so the situation does not keep on occurring. In these cases, the immediate superior or the Occupational Safety department must be informed of the fact. It is the duty of leaders to inform their teams about safety rules and watch over everyone's life.

**ALWAYS KEEP THIS IN MIND:**

- At Papyrus, safety is always a priority, being above any goal or bottom line.
- Any risky situation must be informed to superiors and to the Occupational Safety department.
- It is your responsibility to follow safety regulations and use the proper equipment.

**• DISCRIMINATION, FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING**

The flexibility that Papyrus has in the service it provides should also be reflected in the work place. Papyrus is a flexible and plural company and does not tolerate discrimination based on race, belief, sexual orientation, physical disability or any other kind of discrimination. Likewise, Papyrus respects the individual rights of members and partners regarding their political and union engagements. Thus, it not only recognizes, but also enforces the right to association and negotiation of agreements and collective agreements.

Employees who become aware of any fact or situation that go against this guideline, whether in the company or within the production chain, must report to their immediate superior or to the Conduct Committee, using the reporting box.

**• DISCIPLINARY PRACTICES, WORK HOURS, COMPENSATION AND TRAINING**

With regard to day-to-day practices, Papyrus follows the provisions set forth in the Collective Bargaining Agreement for its category. Likewise, Papyrus undertakes to comply with the provisions of its collective agreements, following the provisions with regard not only to working hours, but mainly to recruit, compensate and promote employees based on the qualifications and skills necessary for the work to be performed. For capacity building, the company shares responsibility for its own intellectual development through formal training and continuing education programs.

Our **flexibility** is reflected in a work environment where differences are accepted and valued



## BUSINESS ACCOUNTABILITY

Papirus works guided by Valuable Relationships, which is why the company values transparency and has zero tolerance for bribes, kickbacks and any other illegal or improper payments or gifts.

Papirus is committed to establishing mutually beneficial relationships with suppliers and customers, which includes:

- Act in compliance with the laws and regulations in force in the country;
- Be responsible and respectful in relation to authorities, customers, suppliers, community members and all other individuals, companies and organizations with which the company is connected to in carrying out its regular activities, always aiming at preserving its good image and reputation;
- Preserve the privilege of Papirus confidential and strategic information that the company has access to, even if employee is no longer connected to the company;
- Preserve company assets, facilities, equipment and materials, using them only for the purposes for which they are intended;
- Not engage in situations in which there may be a conflict of own interests with the interests of the company and, when that is not possible, refrain from representing the company in the matter at hand, immediately communicating the fact to your supervisor;
- Not establish business relationships with companies that, admittedly, do not comply with ethical standards compatible with the Papirus ethical standards.

## WHAT PAPIRUS DOES NOT ALLOW

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### ABUSE OF AUTHORITY

The position held within the company cannot be used to influence aiming at personal gains or advantages, for the business or for third parties in any relationship that may be established.

### MORAL HARASSMENT

Papirus does not tolerate any type of disrespect, embarrassment or humiliation among its employees and partners, regardless of hierarchical levels, job positions or roles. Anyone who considers themselves discriminated against, disrespected or threatened and feels embarrassed to discuss the matter with their direct supervisor, must communicate the fact through the reporting box or speak directly to the Supervisor or HR Manager. Learn more about these channels in the Communication Channels chapter.

### FAMILY RELATIONSHIPS

Direct or indirect relatives of employees (parents, spouse, children, siblings, grandchildren, grandparents, brothers-in-law, cousins, stepchildren, etc.) are not allowed to work in positions that have a hierarchically subordinated relationship.

### ALCOHOL, DRUGS AND WEAPONS

The consumption or sale of alcohol or drugs on Papirus premises and bearing arms is prohibited.

### NON-DISCLOSURE

Providing restricted or confidential information to unauthorized co-workers, third parties or competitors about formulas, operational processes, marketing information, as well as product promotion or marketing, and any other type of information belonging to the company is prohibited.

**RECEIVING GIFTS AND FAVORS**

Accepting gifts, or services from customers, suppliers, business partners or individuals or legal entities that maintain or will maintain a relationship with the company is not allowed. Low value institutional gifts such as pens, planners, calendars and related items are not included.

**ASSOCIATIONS AND POLITICAL CONNECTIONS**

Papirus deems that employee engagement with clubs, political parties and entities is legitimate. However, Papirus does not allow campaigns, lectures, promotions or rallies to be held on company premises.

## CONDUCT COMMITTEE AND DISCIPLINARY PRACTICES

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Our **transforming DNA** is in our product, but mainly in the way our business interfaces with society.

The Papirus Conduct Committee is comprised by Management and Human Resources department:

- Administrative, Financial and Human Resources Director
- Sales Director
- Plant and Supply Chain Director
- Human Resource Manager

They are responsible for analyzing and responding to notifications of attitudes that go against the guidelines presented in this Code of Conduct.

This Code is mandatory. That is why it is important for everyone to know which conduct violates the foregoing in this document and will be subject to the enforcement of adjustments, ranging from reorientation to disciplinary measures, set forth in the labor regulations and, therefore, may even lead to the termination of employment for person(s) involved.



## COMMUNICATION CHANNELS

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To ensure anonymous access to the Conduct Committee, Papirus offers its employees a reporting box. In Limeira, it is located in the cafeteria, and in São Paulo, in the reception area.

If you believe that any attitude in your day-to-day work is contrary to company principles or expected conduct, as presented in the previous chapters, be sure to speak up. You do not need to identify yourself and no one other than the conduct committee members will have access to this information.

If your complaint is related to security issues or that need urgent solution, please contact the Supervisor or the Human Resources Manager directly.

**IMPORTANT:** All matters will be treated with utmost confidentiality.