



TAX GUIDELINE

Introduction and Purpose

Klabin S.A., its controlled entities, subsidiaries and affiliates (hereinafter referred as “**Klabin**” or “**the Company**”) operate in Brazil and abroad in the manufacturing, sale and export of cellulose, packaging paper/board, corrugated packaging and industrial paper bags, generating value to Klabin’s stakeholders in all regions they are located.

Consistent and coherent to its Code of Conduct, Klabin observes all tax and governance rules of each country in which it operates. Hence, the purpose of this guideline is to describe the principles and assumptions adopted by the company in conducting its business, aiming to guarantee a sustainable taxation, the efficient mitigation of tax risks and compliance with all tax rules applicable to its operations.

Klabin's Risk Management Policy complements the present Tax Guideline, covering the management and follow-up of regulatory risks, including tax/fiscal aspects. In addition, the Board of Directors, the Advisory Committees and the Fiscal Council are responsible for monitoring the tax strategies of the Company, as per the provisions of its Bylaws.

Compliance with applicable legislation

Klabin complies with all applicable tax and regulatory legislation in each country in which it operates and is a resident, ensuring the calculation and the payment of taxes due in those jurisdictions. The Company's commitment with integrity, responsibility, consistency and fiscal transparency is the fundamental ground of Klabin’s tax compliance.

Transfer pricing and transactions between related companies

Klabin observes all tax rules applicable to transactions between related parties, including the calculation of transfer pricing methods and margins as per the arm’s length principle in all OECD member countries and in accordance with tax regulations applicable in each jurisdiction.

All changes in transfer pricing methods and margins have the approval and participation of the Legal and Financial Directors. External audit companies review all supporting documentation required by each jurisdiction. Afterwards, Klabin submits those documents to local tax authorities, in accordance with legal requirements.

International tax transparency

The financial statements annually published by the Company bring all information regarding taxes paid. Klabin reports every transaction generating tax impacts in each country, strictly and timely complying with ancillary obligations required by the applicable legislation.



Klabin follows all international tax transparency rules, in accordance with the international standards adopted by each country, including the European Union Directives implemented by each OECD member country and the minimum international standards established through the OECD - G20 Base Erosion and Profit Shifting Project (“BEPS”).

Tax Strategy

The tax strategy adopted by the Company is aligned with its business purpose - both current business and future projects – and new tax possibilities are only analyzed if connected with Klabin’s operations, commercial activities and the generation of value aligned with its core business. Therefore, all tax assumptions are in line with the business strategy approved by Klabin’s governing body and in compliance with domestic tax rules and international tax instruments in force.

In cases of tax incentives negotiation, benefits or rulings with tax authorities, all procedures observe the principles of legality and legal certainty. Every communication with tax Authorities comply with integrity, anti-corruption and good business practices.

Combating harmful tax practices

The Company does not operate in countries with low taxation - privileged tax regimes, tax havens or countries classified as undertaxed jurisdictions - with the purpose of transferring profits, reducing or eliminating taxation from its business operations.

Klabin carries out all transactions in compliance with domestic and international tax standards, applicable according to each jurisdiction, aiming to avoid harmful tax practices.

Management of tax risks

Based on changes in the legislation and the position of administrative and judicial bodies, all the tax assumptions applied by the company are constantly reviewed in order to mitigate risks, map potential contingencies and monitor impacts for the Company and its stakeholders.

Given the applicable tax and accounting rules as well as Klabin’s Risk Management Policy, the Company monitors and publishes tax risks based on uncertain tax treatments.