

**DISCLOSURE OF INFORMATION AND SECURITIES' TRADING POLICY OF  
KLABIN S.A.**

**1. OBJECTIVE**

**1.1.** This Disclosure of Information and Securities Trading Policy of Klabin S.A. ("Policy" and "Company" has the objective of establishing the rules and procedures with respect to the:

(i) disclosure of information, especially acts or Material Facts, in a comprehensive and equitable manner and simultaneously to B3, the CVM and to the shareholders, ensuring an ample and timely disclosure of the Material Fact, in a clear and precise way, conferring predictability to the conduct to be adopted by the Company;

(ii) implementation of the best practices to be adopted for the negotiation of Securities, the issue of the Company, including compliance with the laws and rules for preventing the practice of Insider Trading, in such a way that they are based on the principles of transparency, equitability and ethics;

(iii) implementation of rules and standards of conduct to be observed by the Persons Bound by the Policy.

**2. COVERAGE**

**2.1.** This Policy applies to the Persons Bound by the Policy, should they have still not expressly adhered thereto.

**2.2.** The Company, through its Investor Relations Department – as designated by the Investor Relations Officer - shall formally notify the terms of this resolution to the Persons Bound by the Policy, requiring of the Members of Management and members of the Fiscal Council, the respective formal adherence, in an instrument, pursuant to **Attachment I**, which shall be filed at the registered offices of the Company while there remains a binding relationship with the Company, and for at least five years after their termination.

**2.2.1.** The Company, in an act of discretionary management, may request that other persons, not expressly referred in item 2.2 above, but who may have cognizance of Privileged Information, sign the Instrument of Adherence and/or an eventual confidentiality agreement.

The Persons Bound by the Policy shall ensure that persons under their influence abide by the rules of the Policy, including Connected Persons, directly or indirectly controlled corporations, exclusive investment funds or where the manager's trading decisions for which may be directly influenced, responding jointly and severally with those persons in the event of non-compliance with the Policy as a result of failure to comply with this duty.

**3. DEFINITIONS**

**3.1.** The following terms beginning with capital letters shall be interpreted in conformity with their corresponding meanings, and shown below:

"Controlling Shareholder" pursuant to the terms of Article 116 of the Brazilian Corporations Law, means the natural person or legal entity, or group of persons linked by a voting agreement or under common control that (a) is holder of partners' rights that assure them, in a permanent way, the majority of the votes in decisions of the general shareholders' meeting and the power to elect the majority of the managers of the company; and (b) use effectively their power to direct corporate activities and guide the function of the Company's bodies.

"Shares" are the shares issued by the Company.

"Members of Management" are members of the Board of Directors and the Executive Board.

"B3" is B3 – Brasil, Bolsa, Balcão S.A.

"Blackout Period" is the period in which the Persons Bound by the Policy may not trade Securities due to determination of non-negotiation or on the basis of a communication by the Investor Relations Officer.

"Stock Exchanges" means other stock exchanges, which are not B3, and organized over-the-counter market entities in which the Securities are eligible for trading in Brazil or abroad.

"Affiliates" are corporations in which the Company exerts significant influence. Significant influence is considered when the Company holds or exercises the power to participate in the decisions of the financial or operational policies of the other corporation, without controlling it. Significant influence is presumed when the Company is holder of 20% or more of the voting capital of the other corporation, without controlling it.

"Company" is Klabin S.A.

"Board of Directors" is the Company's Board of Directors.

"Fiscal Council" is the Company's Fiscal Council, when installed.

"Controlled Companies" are entities in which the controlling company, either directly or through other controlled companies, is holder of partner's rights which assure them, on a permanent basis, preponderance in corporate resolutions and the power to elect the majority of the members of management.

"CVM" is the Brazilian Securities and Exchange Commission.

"Investor Relations Officer" is the Officer of the Company responsible for supplying information to the investors, the CVM and to B3, as well as for the updating of the Company's registration with the CVM and for the implementation and monitoring of this Disclosure of Information and Securities' Trading Policy.

"Executive Board" is the Company's Executive Board.

"Ex-Members of Management" are Members of Management who no longer pertain to the Company's management.

"Material Fact" , pursuant to CVM Resolution 44, is any decision of the Controlling Shareholder, resolution of the general shareholders meeting or management bodies of the Company, or any act or fact of an administrative, technical, negotiation process or economic-financial policy nature, that has occurred or is related to the businesses of the Company, that can influence in a significant way (a) the price of the Securities issued by the Company or securities indexed to the same, or (b) a decision of the investors to purchase, sell or maintain these Securities, or (c) a decision of the investors to exercise any inherent rights to a condition as a holder of the Securities issued by the Company or securities indexed to the same.

"Privileged Information" means all information relative to the Act or Material Fact until it is disclosed to the regulatory organs, B3, the Stock Exchanges and other similar entities and simultaneously, to the shareholders and investors in general. Privileged Information is also considered as that related to the quarterly or annual financial statements still not published to the market.

"Insider Trading" is any trading of the Company's Securities by the Persons Bound by the Policy and any others that, due to circumstantial facts, have access to Privileged Information relative to the businesses and to the situation of the Company, and use this information improperly.

"CVM Resolution 44" is CVM Resolution 44 of August 23, 2021, as amended.

"CVM Instruction 400" is CVM Instruction 400 of December 29, 2003, as amended.

"CVM Instruction 476" is CVM Instruction 476 of January 16, 2009, as amended.

"Brazilian Corporations Law" is Law 6.404 of December 15, 1976, as amended.

"Members of the Fiscal Council" are effective members and alternates of the Company's Fiscal Council, when installed, elected by decision of the General Shareholders' Meeting.

"Connected Persons" are persons connected to the Members of Management, Controlling Shareholders of the Company, Members of the Fiscal Council, and members of the Statutory Committees, pursuant to CVM Resolution 44: (i) the spouse from whom he/she is not legally separated; (ii) the partner; (iii) any dependent relative included in the annual income tax return of the natural person; and (iv) corporations controlled directly or indirectly by them.

"Persons Bound by the Policy" are the Company, the Controlling Shareholders, Members of Management, Members of the Fiscal Council, and members of any bodies with technical or consultative functions, created by statutory provision or, also, whoever by virtue of their rank, function or position in the Company, its Controlling Company, its Controlled or Affiliate Companies, have cognizance of Privileged Information.

"Investment Plan" is an individual investment plan formalized by a Linked Person, pursuant to Article 16 of CVM Resolution 44.

"Policy" is this Policy of Disclosure of Information and Securities' Trading.

"Instrument of Adherence" is the instrument of adherence to this Policy, which shall be signed by the Persons Bound by the Policy, being the instrument to be signed by the Controlling Shareholders, Members of Management and members of the Fiscal Council and organs with

technical and consultative functions, created by statutory provision, is included as the model in **Attachment I** to this Policy.

"Securities" are any shares, debentures, real estate receivables certificates, subscription bonuses, subscription receipts and rights, promissory notes, purchase or sale options or derivatives of any type, or, also, any other security or collective investment contracts the issue of the Company or indexed to them, which by legal definition, are deemed a "security".

"Restrictions on Trading" are the instances where trading is restricted pursuant to item 6.5 of this Policy.

#### **4. REFERENCES**

**4.1.** This Policy was prepared pursuant to the Brazilian Corporations Law, the CVM norms, in particular, CVM Resolution 44, the Brazilian Code of Corporate Governance – Publicly Listed Companies, as well as in accordance with the best market practices.

#### **5. DISCLOSURE AND USE OF INFORMATION**

**5.1.** General Rules and Procedures for the Disclosure of Material Facts. The Investor Relations Officer shall be the officer responsible for the implementation and monitoring of this Policy as well as the officer's responsibility being the immediate disclosure and communication of a Material Fact to the CVM, B3 and to the Stock Exchanges, as applicable, and to the market in general, as well as the adoption of other procedures established herein.

**5.2.** The Persons Bound by the Policy with access to Privileged Information, shall be responsible for communicating this information in writing to the Investor Relations Officer, who shall ensure its disclosure.

**5.3.** In case of omission on the part of the Investor Relations Officer, the Controlling Shareholders, Members of Management, Members of the Fiscal Council and any organs with technical or consultative functions created by statutory provision, that have personal knowledge of a Material Fact still not disclosed to the market, and verifying the omission of the Investor Relations Officer in complying with his duty of communication and disclosure, pursuant to this Policy, shall communicate the Material Fact with immediate effect to the CVM in accordance with other applicable rules in CVM Resolution 44.

**5.4.** The disclosure of a Material Fact shall occur, whenever possible, before the opening or after the closing of the trading day on B3 and, if the case, of the Stock Exchanges and the Over-the-Counter Market in which the Securities, the emission of the Company, are eligible for trading. Should there be an incompatibility of trading hours, the business hours of the Brazilian market, that is B3, shall prevail.

**5.5.** Should disclosure be necessary prior to the beginning of trading on B3, it is recommended that disclosure take place at least one hour prior to the opening of the business day. Should this not be possible than disclosure shall occur no less than 30 minutes prior to the opening of the trading hours.

**5.6.** In addition, should it be exceptionally imperative that disclosure of the Material Fact occur during business hours, the Investor Relations Officer shall contact B3's Issuers' Department, prior to the disclosure and communication of the Material Fact, to suspend trading in Securities, pursuant to B3's Issuers Manual.

**5.7.** In the case of disclosure of information that is not a Material Fact, other means of disclosure shall be used, such as announcements to the market, releases, or notices to shareholders, as the case may be.

**5.8.** All and any Material Fact shall be disclosed to the investor public: (i) by sending the information to the Empresas-net System - Periodic and Eventual Information, in the internet, of the CVM and B3, and, if the case, of the Stock Exchanges; (ii) through the news disclosure portal available in the internet, as published in the Company's Registration Form; and (iii) through publication in the Company's website page (ri.klabin.com.br).

**5.9.**

Exceptions to Disclosure: Exceptionally, in the cases where communication and disclosure of a Material Fact may place the legitimate interests of the Company at risk, the Company may decide not to communicate and disclose the Material Fact. In these cases, the procedures enshrined in this Policy shall be adopted to ensure the confidentiality of this information.

**5.10. Preservation of Confidentiality.** The Persons Bound by the Policy shall maintain the confidentiality of the Privileged Information relating to the Company, its Controlling Shareholders, Controlled Companies, and Affiliates, to which they have had access due to their rank, position or function held until its effective disclosure to the market and shall ensure that subordinates and third parties in their trust do the same, being jointly and severally responsible in the event of noncompliance.

**5.11.** It is the responsibility of the Investor Relations Officer to create the appropriate procedures for ensuring the confidentiality of the Privileged Information.

**5.11.1.** Without prejudice of the procedures created by the Investor Relations Officer, if the case, the following caveats shall also be observed by the Persons Bound by the Policy:

- (i)** not to discuss this information in public places, in the presence of third parties, including Connected Persons, or in conference calls where there is uncertainty as to who are the participants;
- (ii)** maintain all memorandums, correspondence and other documents containing this information in a secure and reserved place;
- (iii)** not to supply their data for accessing the Company's network and database.

**5.11.2.** The Persons Bound by the Policies that inadvertently or without authorization, communicate, personally or through third parties, Privileged Information to any third party, or allow third parties to take cognizance thereof, prior to its disclosure to the market, shall

immediately inform this fact to the Investor Relations Officer so the latter may take the appropriate measures.

**5.11.3.** Disclosure of Privileged Information to third parties may only occur in the interests of the Company, through the signature of agreements that oblige the recipient to maintain confidentiality of the information; and (b) not to negotiate Securities using the information. This provision does not apply to the transmission of information to whom by law is obliged to observe these duties.

## **6. TRADING OF SECURITIES**

### **6.1. Trading of Members of Management, persons connected to them and of**

Controlled Companies, Affiliates, and the Company itself. The Members of Management, members of the Fiscal Council and any organs with technical or consultative functions created or may come to be created in the future by statutory provision as well as the Company itself, shall inform their ownership and trading executed with Securities issued by the Company, by its Controlling Companies or Controlled Companies, in the latter two cases, as long as the entities are publicly held companies.

**6.1.1.** Pursuant to CVM Resolution 44, the persons listed in item 6.1 above are obliged to submit a communication of ownership and trading activities to the Investor Relations Officer within a period of:

- (i) up to 5 business days subsequent to the execution of the trading;
- (ii) on the first business day immediately after their investitures in the respective position; or
- (iii) in the case of the Controlling Shareholder, immediately after being classified in this condition.

**6.1.2.** For the purposes of item 6.1 above, trading in Securities of the Company, Controlling or Controlled Companies shall equate to the investment, redemption, and trading of quotas of investment funds, the regulations of which provide that their portfolio of shares be composed exclusively of shares, the issue of the Company, its Controlling Shareholder, or of its Controlled Companies.

**6.2.** The Investor Relations Officer shall report or disclose the information received through the structured electronic form available in the Empresas.net System within 10 days of each month end.

**6.3. Relevant trading activities.** The Controlling Shareholders, the Shareholders that elected members of the Board of Directors or of the Fiscal Council of the Company, any person mentioned in item 6.1 of this Policy, as well as any person, or group of persons, acting jointly or representing the same interest, shall communicate to the Investor Relations Officer of the Company the acquisition or sale of a relevant shareholding stake, immediately after having acquired or sold the said stake, whether directly or indirectly, which corresponds to the levels of 5%, 10%, 15% and

thereafter successively, including in this communication, the information required under CVM Resolution 44.

**6.4. General Rules:**

**6.4.1.** It is forbidden to trade Securities, the issue of the Company by Persons Bound by the Policy, or by whom by virtue of their rank, function, or position in the Company, in the Controlled Companies and in the Affiliates, have access to Relevant Information prior to its disclosure to the market.

**6.4.2.** The same restriction applies to whoever has cognizance of Relevant Information, in the knowledge that it involves information not yet disclosed to the market, in particular those that have a commercial, professional and trust relationship with the Company, such as independent auditors, securities' analysts, consultants and institutions, parties to the distribution system, to whom it is the responsibility to verify with respect to the disclosure of the information prior to trading with Securities and, if the case, derivatives indexed to them.

**6.5. Restrictions on Trading.** The Persons Bound by the Policy may not trade Securities in the following events:

**(i)** whenever the disclosure of any Material Fact of which they have knowledge is pending publication;

**(ii)** in the period of 15 consecutive days prior to the disclosure of quarterly (ITR) and annual (DFP) financial information and on the day of disclosure itself, before this information is made public, being certain that the counting of the period of 15 days shall be made excluding the day of effective disclosure;

**(iii)** in the case of (i) a public offering of distribution of Securities, up to the disclosure of an announcement of conclusion, pursuant to the exceptions in CVM Instruction 400; and (ii) a public offering of distribution of Securities with restricted placement efforts, during the period of 90 days as from the date of subscription or acquisition of certain Securities by the investor, pursuant to Article 13 of CVM Instruction 476;

**(iv)** as from the moment in which studies or analyses are initiated with respect to operations for incorporation, total or partial spin-off, merger, transformation or any form of corporate reorganization or business combination, change in control of the company, including through the execution, alteration or rescission of a shareholders' agreement, decision for promoting the cancelation of registration as a publicly held company or change in the corporate environment or business segment of the shares of its issue as well as a request for judicial or extra-judicial reorganization and for bankruptcy declared by the company itself.

**(v)** while the process of acquisition or sale of Shares by the Company itself, its Controlled Companies, Affiliates, or other corporations under its common control is pending or if an option or mandate for the same end has been granted.

**6.5.1.** The restriction set forth in item (v) above shall be in force only on the days in which the repurchase is being effectively executed by the Company, as long as: (a) the days of the week are established when the Company shall trade in the market; and (b) the Investor Relations Officer communicates these dates to Persons Bound by the Policies.

**6.5.2.** The Board of Directors of the Company may not decide on the acquisition or sale of shares, the issue of the Company itself, prior to the fact being made public through the publication of a Material Fact:

**(i)** the execution of any agreement or contract with a view to the transfer of the Company's controlling shareholding;

**(ii)** the granting of an option or mandate for transferring the shareholding control of the Company; and

**(iii)** the existence of an intention to promote the incorporation, total or partial spinoff, merger, transformation, or corporate reorganization.

**6.6.** Following approval of the repurchase program, should a subsequent event occur which incorporates any of the three eventualities above, the Company shall suspend with immediate effect, the operations with shares of their own issue until the disclosure of the respective Material Fact.

**6.7.** Blackout Period. The Persons Bound by the Policy may not trade Securities during the entire period in which there is a non-trading determination or according to a communication of the Investor Relations Officer.

**6.7.1.** The Investor Relations Officer is granted the powers to determine through an announcement, periods in which the Persons Bound by the Policy shall abstain from trading Securities, it being certain that the said abstention shall continue until the disclosure of a new announcement is made expressly informing the end of the period.

**6.7.2.** The Investor Relations Officer shall promptly notify any restrictions on trading the Securities. However, the eventual absence of the said communication shall not exempt Persons Bound by the Policy from their legal and regulatory obligation to abstain from trading Securities during all periods when there is a determination not to do so pursuant to the regulations and legislation in force.

**6.7.3.** The Investor Relations Officer is not obliged to give reason for the decision determining the Blackout Period, which shall be kept confidential by their recipients.

**6.7.4.** The Blackout Period may be extended even after disclosure to the market of the Material Fact, this additional restriction being expressly stated in the communication disclosed by the Investor Relations Officer.

**6.7.5.** The Persons Bound by the Policy, under all circumstances, shall maintain the confidentiality regarding the Blackout Period.

**6.8.** The above restrictions do not apply:



- (i) to acquisition of Shares held as treasury stock as a result of a private trading operation due to the exercising of purchase options within the scope of a stock options purchase plan approved by the general shareholders' meeting; or
- (ii) in the case of a grant of Shares to Members of Management, employees, or service providers as part of remuneration previously approved by the general shareholders' meeting.

**6.9.** The restrictions shall also apply to the Ex-Members of Management that withdraw from the Company's management prior to the publication of certain Privileged Information in relation to the Company's businesses, these individuals to abstain from trading Securities of the Company:

- (i) for a period of 3 months as from the date of their removal; or
- (ii) until the disclosure by the Company, of the Material Fact to the market, which ever shall occur first, except, in this case, if trading with Securities of the Company, following disclosure of the Material Fact, should interfere in the conditions of the Company's businesses, in detriment to the Company or its shareholders and the Investor Relations Officer, in accordance with his duties and at his exclusive criterion, shall determine the extension of the period of Restrictions on Trading, which under no circumstances shall surpass, for the persons mentioned in this item, the period of 3 months pursuant to item (i) above.

**6.10.** Operations by beneficiaries of Share-based compensation plans. The Persons Bound by the Policy who are beneficiaries of Share-based compensation plans may not execute any operations with derivative instruments that nullify or mitigate their economic exposure to the Shares .

**6.11.** The restrictions on trading with Securities pursuant to this Policy apply to Securities lending operations by the Persons Bound by the Policy.

**7.** Operations executed by investment funds. The restrictions contained in this Policy do not apply to trading executed by investment funds of which the Persons Bound by the Policies are quota holders conditional on (a) the investment funds not being exclusive; and (b) the trading decisions taken by the administrator or manager of the investment fund portfolio are not influenced by the quota holders.

## **8. INDIVIDUAL INVESTMENT PLAN**

**8.1.** Persons Subject to the Disclosure of Information and Securities' Trading Policy may make use of Investment Plans, provided that approved by the Board of Directors.

## **9. POLICY VIOLATION**

**9.1.** Any person that violates the provisions of this Policy shall be subject to the procedures and penalties established by law, by the regulations in effect. Without prejudice to sanctions eventually applicable, in the light of these norms, the violation of this Policy shall incur the application of the relative penalties, pursuant to the Company's Integrity Program.

**9.2.** Without prejudice to the communication of the violations through the Company's Integrity and Ombudsman Channel, eventual failure to comply with this Policy shall be communicated to

the Investor Relations Officer, who shall submit the matter to the Integrity and Internal Audit teams, with the support, where necessary, of other areas of the Company, for the imposition of penalties by the Integrity Commission.

## **10. APPROVAL AND VALIDITY**

**10.1.** Validity. This Policy shall take effect on the date of its approval by the Company's Board of Directors and must be reviewed at intervals of up to 2 years.

**10.2.** Revision. The Board of Directors shall evaluate the need of eventual revision of this Policy, in accordance with the statutory, legislative, or regulatory changes which the Company is subject as well as to improve the corporate governance practices, rules and procedures. Additionally, the Company's Executive Board may at any time, suggest to the Board of Directors the revision of this Policy.

**10.3.** Disclosure of the Policy. Following approval by the Company's Board of Directors, any amendment of this Policy shall be communicated by the Investor Relations Officer to the CVM and to the Stock Exchanges and organized over-the-counter market in which the Securities of the Company are eligible to trade, the said communication to be accompanied by a copy of the resolution and the entire content of the documents that discipline and incorporate the Policy.

São Paulo, April 26, 2022.

## Attachment I

### INSTRUMENT OF ADHERENCE TO THE DISCLOSURE OF INFORMATION AND SECURITIES' TRADING POLICY OF KLABIN S.A.

I, [**name**], [nationality], [civil status], [occupation], bearer of identity card [RG/RNE] nº [number] and CPF/MF under nº [number], resident and domiciled at [address], through this agreement do declare my adherence to the Disclosure of Information and Securities' Trading Policy of **Klabin S.A.**, a publicly held company, with registered offices at Avenida Brigadeiro Faria Lima, 3600, in the city and state of São Paulo, CEP 04538-132, Brazil, enrolled in the CNPJ/MF under number 89.637.490/0001-45, registered with the State of São Paulo Board of Trade ("JUCESP") under the identification of the companies' register, or NIRE, 35.300.188.349 ("Company"), pursuant to CVM Resolution 44, of August 23, 2021, as amended and approved at the meeting of the Company's Board of Directors of [•] ("Policy").

São Paulo, [•], [•].

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Name:

Position: