

## CLAIM OF INDEPENDENT VERIFICATION – BUREAU VERITAS



### INTRODUCTION

Bureau Veritas Certification Brazil (Bureau Veritas) was hired by Bracell SP Celulose Ltda (BRACELL), to conduct an independent verification of the Company's One-To-One Commitment.

### SCOPE OF WORK

The scope of this verification covered:

The verification of the One-To-One Commitment (for each hectare of eucalyptus planted, BRACELL undertakes to conserve one hectare of vegetation in conservation areas), regarding the correct parameterization of the indicator and an analysis of the accuracy of the data obtained in the period from January 1 to December 31, 2023.

### RESPONSIBILITIES OF AVB AND BUREAU VERITAS

The collection, calculation and presentation of the data are the sole responsibility of BRACELL's management. Bureau Veritas is responsible for providing an independent opinion to the interested parties, in accordance with the scope of work defined in this statement.

### METHODOLOGY

The verification covered the following activities:

1. Interviews with those responsible for the contents of the One-to-One Commitment.
2. Analysis of documentary evidence provided by BRACELL for the period covered: January 1 to December 31, 2023.
3. Evaluation of the systems used to compile data.
4. Evaluation of the Term of Reference of the One-To-One Commitment;
5. Verification of the Forest Promotion Procedure PR FLOR 052 – Rev.5 of 02/06/2024.
6. Verification of the Forest Partnerships Procedure PF035/33 – Rev.10 of 07/26/2024.
7. Evaluation of the Company's actions, programs and policies, aimed at meeting the commitment.

The verification level adopted was Limited, in accordance with the requirements of the ISAE 3000 standard<sup>1</sup>, incorporated into Bureau Veritas' internal verification protocols.

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<sup>1</sup> International Standard on Assurance Engagements 3000 – Assurance Engagements other than Audits or Reviews of Historical Financial Information

## **EXCLUSIONS AND LIMITATIONS**

Excluded from this verification was any assessment of information related to:

- Activities outside the reported period.
- Position claims (expressions of opinion, belief, objectives or future intentions) by BRACELL.

The following limitations have been applied to this verification:

- The Accuracy and Reliability of data were verified on a sample basis, exclusively in the light of the information and data related to the commitment presented.

## **OPINION ON THE ONE-TO-ONE COMMITMENT**

- The result of the One-to-One Commitment is available in the Company's Sustainability Report, which can be accessed on the website <https://www.bracell.com/>. The scope of our verification covered the indicator data for 2023.
- During our Verification we evidenced that the One-To-One Commitment (for each hectare planted of eucalyptus, BRACELL undertakes to conserve one hectare of vegetation in conservation areas) was analyzed and monitored in a structured manner. Additionally, we found that BRACELL prepared a documented "Term of Reference" in order to ensure the planning, control and monitoring of the Commitment.
- The One-To-One Commitment covers the Atlantic Forest, Cerrado and Caatinga Biomes, located in the States of Bahia, São Paulo and Mato Grosso do Sul, where the Company operates directly.
- We found that in addition to the conservation of native areas under BRACELL's management, the Commitment supports conservation in public areas, through partnerships with federative entities and other institutions, in states where the Company operates directly. Partnerships with government levels (federal, state and municipal) take place through the transfer of services or materials to Conservation Units, such as parks, ecological stations, wildlife refuge and others.

- We found that BRACELL has Due Diligence assessments when leasing and/or partnering new areas. Additionally, we verified that the forest units of São Paulo and Bahia have Cerflor certifications, according to NBR 14789:2012 "Sustainable Forest Management and PEFC ST 2002:2020 – "Chain of Custody of Products from Forests and Trees", which enables and systematizes the regularity, standardization, reduction of impacts and good environmental practices.
- BRACELL uses the Sustainable Forest Management (SGF) for forest registration and monitoring; the system allows the integration of data between the different registration, forestry, harvesting and quality modules, to support decision-making in forest management. Together with the SGF, the Company uses the ArcMAP 10.8.1 platform, where it keeps the areas updated in the form of georeferenced maps. We show compatibility between this platform and the SGF System, so that the locations of the areas under BRACELL's responsibility were considered consistent.
- The accounting of the eucalyptus planting areas and native vegetation areas, which were effectively eligible for the Commitment, was carried out through the SGF System, which is interconnected to the ArcMAP platform from the polygons of the eucalyptus planting areas and vegetation of the conservation areas (Legal Reserve, Permanent Preservation Area and other areas intended for conservation). In addition to this accounting, the areas of public native vegetation were added, which were defined in the Cooperation Terms, signed between BRACELL and the Government. The current Terms were signed with Fundação Florestal de São Paulo, Secretaria de Meio Ambiente da Bahia (Sema), Instituto de Meio Ambiente de Mato Grosso do Sul (Imasul) and Secretaria Municipal de Meio Ambiente e Agronegócio (Semea) of Três Lagoas – MS.
- Regarding the result of the Commitment, we showed that in 2023 the goal was 92% of conserved areas in conservation areas under the company's management and in partnership with public areas.

## RECOMMENDATIONS

- Strengthen the documented requirements of the One-to-One Commitment, clearly and objectively presenting the pre-established technical criteria for public/private partnerships, with regard to BRACELL's responsibilities in the conservation of native vegetation in public areas.

## CONCLUSION

As a result of our verification process, we have concluded that:

- The information provided on BRACELL's One-to-One Commitment is balanced, consistent, and reliable.
- BRACELL has established appropriate systems for the collection, compilation, and analysis of both quantitative and qualitative data.
- The metrics associated with the Commitment have been properly defined, and the indicators has traceable data streams.
- In our opinion, BRACELL has sufficient strategies and actions in place to achieve the goal within the expected timeframe.

## CLAIM OF INDEPENDENCE AND IMPARTIALITY

Bureau Veritas is an independent professional services company specializing in Quality, Health, Safety, Social and Environmental management, with over 186 years of experience in independent evaluation services.

Bureau Veritas has implemented and applies a Code of Ethics throughout its business to ensure that its employees uphold the highest standards in their daily activities. We are particularly attentive to avoiding conflicts of interest.

The verification team has no other affiliation with BRACELL, apart from the independent verification of the One-To-One Commitment. We confirm that there is no conflict between other services provided by Bureau Veritas and this verification carried out by our team.

The team conducting this verification for BRACELL has extensive knowledge in verifying information and systems related to environmental, social, health, safety, and ethical issues, which, combined with the experience in these areas, allows us to have a clear understanding of the presentation and verification of good corporate responsibility practices.

## CONTACT

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São Paulo, August, 2024.



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