

Cielo S.A.

Corporate Taxpayer Identification Number (CNPJ) No. 01.027.058/0001-91

Company Registration Number (NIRE) 35.300.144.112

**ABSTRACT OF THE MINUTES FROM THE BOARD OF DIRECTORS MEETING
HELD ON MAY 25, 2022**

DATE, TIME AND PLACE: On the 25th (twenty-fifth) day of April, 2022, at 2 p.m., at the registered office of Cielo S.A. ("Company"), at Alameda Xingu, nº 512, 24º Andar, Sala Excelência para o Cliente, Alphaville, Centro Industrial e Empresarial, Postal Code (CEP) 06455-030, in the city of Barueri, state of São Paulo.

OFFICERS: Chair: Mr. José Ricardo Fagonde Forni; Secretary: Mrs. Tatiane Zornoff Vieira Pardo.

ATTENDEES: The majority of the members of the Company's Board of Directors ("Board").

Order of Business: review of and deliberation on: **(01)** proposal for adjustments to Policies on **(a)** Anti-Corruption, **(b)** Competition, **(c)** Privacy and Data Protection and **(d)** Sustainability; **(02)** proposal for adjustments to the Internal Rules of the Sustainability Committee; **(03)** election of the members of the Executive Board; **(04)** election of the members of the Advisory Committees.

DELIBERATIONS: At the beginning of the meeting, the members of the Board of Directors analyzed the items on the Order of Business and decided to:

(01) Unanimously approve the proposed adjustments on:

(1.1) Anti-Corruption Policy and Competition Policy, as recommended by the Audit, Corporate Governance and Risk Committees, which shall be in force, as of this date, pursuant to Annex I and Annex IV;

(1.2) Privacy and Data Protection Policy and Sustainability Policy, as recommended by the Corporate Governance and Risk Committees, which shall become effective as of this date, in accordance with Annex II and Annex III.

(02) **Unanimously** approve the proposed adjustments to the internal rules of the Sustainability Committee, as recommended by the Corporate Governance Committee, which shall become effective as of this date, in accordance with Annex V.

(03) **Unanimously** approve, as recommended by the Personnel Committee and given the review of the documents made available with the information about the candidates and confirmation **(a)** of the candidates' compliance with the rules and parameters set out in the Policy on Nomination and Compensation of members of the Company's governance bodies ("Nomination and Compensation Policy"), including in relation to the legal requirements and impediments set forth therein and **(b)** of the conformity of the nomination process established in said Policy, the election of the members of the Company's Executive Board, with a unified term of office of 2 (two) years, that is, until the first meeting to be held by the Board of Directors immediately after the Company's Annual General Meeting that deliberates on the matters set out in Article 132 of Law No. 6.404/76 for the 2023 fiscal year, namely:

(Belongs to the Abstract of Minutes of the Ordinary Meeting of the Board of Directors of Cielo S.A. held on May 25, 2022)

- (a) Mr. **Gustavo Henrique Santos de Sousa**, Brazilian, married, Business Administrator, bearer of RG [ID] No. 1373689 SSP/RN, enrolled under CPF/ME [Individual Taxpayer Registry] No. 018.831.394-06, with business address in the city of Barueri, state of São Paulo, at Alameda Xingu, nº 512, 31º andar, Alphaville, Centro Industrial e Empresarial, CEP [ZIP Code] 06455-030 to the position of CEO of the Company.
- (b) Mr. **Fernando Pinto Lima**, Brazilian, married, Business Administrator, bearer of RG [ID] No. 18.310.052-0 SSP/SP, enrolled under CPF/ME [Individual Taxpayer Registry] No. 157.549.858-86, with business address in the city of Barueri, state of São Paulo, at Alameda Xingu, nº 512, 31º andar, Alphaville, Centro Industrial e Empresarial, CEP [ZIP Code] 06455-030, to the position of Director with no specific title (Executive Director of Personnel, Management and Performance) of the Company;
- (c) Mr. **Filipe Augusto dos Santos Oliveira**, Brazilian, married, Business Administrator, bearer of RG [ID] No. 28.716.588-7 SSP/SP, enrolled under CPF/ME [Individual Taxpayer Registry] No. 341.332.198-64, with business address in the city of Barueri, state of São Paulo, at Alameda Xingu, nº 512, 31º andar, Alphaville, Centro Industrial e Empresarial, CEP [ZIP Code] 06455-030 to the positions of Director with no Specific Title and Director of Investor Relations (Executive Director of Finance and Investor Relations) of the Company;
- (d) Mr. **Marcelo de Giuseppe Toniolo**, Brazilian, married, administrator, bearer of RG [ID] No. 256072024 SSP/SP, enrolled under CPF/ME [Individual Taxpayer Registry] No. 205.545.788-83, with business address at Alameda Xingu, 512, 31º andar, Alphaville, Centro Industrial e Empresarial, CEP [ZIP Code] 06455-030, to the position of Director with no specific title (Vice President of Risk, Compliance, Prevention and Security) of the Company;
- (e) Mr. **Mauro Américo de Carvalho Gomide**, Brazilian, married, Business Administrator, bearer of RG [ID] No. 26.850.060-5 SSP/SP, enrolled under CPF/ME [Individual Taxpayer Registry] No. 305.611.568-08, with business address in the city of Barueri, state of São Paulo, at Alameda Xingu, nº 512, 24º andar, Alphaville, Centro Industrial e Empresarial, CEP [ZIP Code] 06455-030 to the position of Director with no Specific Title (Director of Technology) of the Company;
- (f) Mr. **Paulo Adriano Rômulo Naliato**, Brazilian, married, Business Administrator, bearer of RG [ID] No. 17.854.577 SSP/SP, enrolled under CPF/ME [Individual Taxpayer Registry] No. 112.882.548-14, with business address in the city of Barueri, state of São Paulo, at Alameda Xingu, nº 512, 24º andar, Alphaville, Centro Industrial e Empresarial, CEP [ZIP Code] 06455-030, to the position of Director with no specific title (Executive Vice President of Retail Sales and E-commerce) of the Company;
- (g) Ms. **Renata Andrade Daltro dos Santos**, Brazilian, married, Business Administrator, bearer of RG [ID] No. 62.890.603-1 SSP/SP, enrolled under CPF/ME [Individual Taxpayer Registry] No. 884.807.985-72, with business address in the city of Barueri, state of São Paulo, at Alameda Xingu, nº 512, 24º andar, Alphaville, Centro Industrial e Empresarial, CEP [ZIP Code] 06455-030, to the position of Director with no specific title (Vice President of Sales, Large Accounts) of the Company;
- (h) Mr. **Walter Rinaldo**, Brazilian, married, Electronic Engineer, bearer of RG [ID] No. 17.798.711-x SSP/SP, enrolled under CPF/ME [Individual Taxpayer Registry] No. 124.245.858-14, with business address in the city of Barueri, state of São Paulo, at Alameda Xingu, nº 512, 24º andar, Alphaville, Centro Industrial e Empresarial, CEP [ZIP Code] 06455-030 to the position of Director with no Specific Title (Director of Products and Business) of the Company.

It is hereby established that the members of the Executive Board elected herein **(a)** fulfill all the conditions set forth in BCB Resolution No. 81/2021, and have extensive knowledge of the regulations contained therein, and **(b)** will only take office as members of the Company's Executive Board after their election has been approved by the Central Bank of Brazil, under the terms set forth in BCB Resolution No. 81/2021, upon signing the respective terms of office. Moreover, it is hereby established that the statements of clearance, under the terms of the Brazilian Corporation Law, are attached to these Minutes.

(04) Unanimously approve, as recommended by the Corporate Governance Committee and given the review of the documents made available with the information about the candidates, information provided by the Company's Board of Directors and confirmation **(a)** of the candidates' compliance with the rules and parameters set out in the Nomination and Compensation Policy, including in relation to the legal requirements and impediments set forth therein and **(b)** of the conformity of the nomination process established in said Policy, the election of the members of the Advisory Committees to the Board of Directors, with a unified term of office of 2 (two) years, that is, until the first meeting to be held by the Board of Directors immediately after the Company's Annual General Meeting that deliberates on the matters set out in Article 132 of Law No. 6.404/76 for the 2023 fiscal year, pursuant to the terms of possession signed and filed at the Company's headquarters, namely:

1.1. Members of the Audit Committee:

- (a) Aldo Luiz Mendes**, Brazilian, living as a married couple with the objective of constituting a family, Economist, bearer of RG [ID] No. 468756 SSP/DF, enrolled under CPF/ME [Individual Taxpayer Registry] No. 210.530.301-34, with business address at Alameda Xingu, 512, 31º andar, Edifício Evolution, Alphaville, in the city of Barueri, state of São Paulo, CEP [ZIP Code] 06455-030;
- (b) Mônica Luciana Martins de Oliveira**, Brazilian, married, retired, bearer of RG [ID] No. 769070 SSP/DF, enrolled under CPF/ME [Individual Taxpayer Registry] No. 398.374.081-20, with address in the city of Brasília, Federal District, at Condomínio Vivendas Bela Vista, Mod. G, Casa 38, Sobradinho, CEP [ZIP Code] 73105-909;
- (c) Paulo Henrique Adolhe**, Brazilian, married, retired, bearer of RG [ID] No. 1025114677, enrolled under CPF/ME [Individual Taxpayer Registry] No. 383.585.490-91, with business address in the city of Nova Petrópolis, state of Rio Grande do Sul, at Rua Ipiranga, nº 244, Recanto do Sossego, CEP [ZIP Code] 95150-000.

1.2. Members of the Finance Committee:

- (a) Daniel Almeida Bogado Leite**, Brazilian, married, Economist, bearer of RG [ID] No. 26444, enrolled under CPF/ME [Individual Taxpayer Registry] No. 091.961.557-01, with business address in the city of Brasília, Federal District, at SAUN, Quadra 5, Lote B, Edifício Banco do Brasil, Torre 1, 6º andar, Asa Norte, CEP [ZIP Code] 70040-912;
- (b) Fernando José Costa Teles**, Brazilian, married, Engineer, bearer of RG [ID] No. 57.907.495-X SSP/SP and enrolled with CPF/ME [Individual Taxpayer Registry] No.

858.058.237-72, residing at Rua Redentor, 119, 4º andar, Ipanema, in the city and state of Rio de Janeiro, CEP [ZIP Code] 22421-030;

- (c) **Francisco José Pereira Terra**, Brazilian, married, Banker, bearer of RG [ID] No. 13.739.154-7 SSP/SP, enrolled under CPF/ME [Individual Taxpayer Registry] No. 111.112.668-24, with business address at **Núcleo Cidade de Deus, Vila Yara, Osasco, state of São Paulo, CEP [ZIP Code] 06029-900;**

1.3. Members of the Corporate Governance Committee:

- (a) **Gustavo Henrique Santos de Sousa**, Brazilian, married, Business Administrator, bearer of RG [ID] No. 1373689 SSP/RN, enrolled under CPF/ME [Individual Taxpayer Registry] No. 018.831.394-06, with business address in the city of Barueri, state of São Paulo, at Alameda Xingu, nº 512, 31º andar, Alphaville, Centro Industrial e Empresarial, CEP [ZIP Code] 06455-030;
- (b) **Francisco Augusto da Costa e Silva**, Brazilian, married, Lawyer, bearer of RG [ID] No. 2.233.546 IFP/RJ and enrolled under CPF/ME [Individual Taxpayer Registry] No. 092.297.957-04, with business address at Avenida Rio Branco, 110, 39º e 40º andares, city and state of Rio de Janeiro, CEP [ZIP Code] 20040-001;
- (c) **Patricia Soares Martil**, Brazilian, married, Banker, bearer of RG [ID] No. 22.137.362-7, enrolled under CPF/ME [Individual Taxpayer Registry] No. 147.229.278-20, with business address in the city of Osasco, state of São Paulo, at **Núcleo Cidade de Deus, Vila Yara, CEP [ZIP Code] 06029-900;**
- (d) **Raimundo Moreira**, Brazilian, married, Banker, bearer of RG [ID] No. 868231, enrolled under CPF/ME [Individual Taxpayer Registry] No. 313.377.591-04, with business address in the city of Brasília, Federal District, at SAUN, Quadra 5, Lote B, Edifício Banco do Brasil, Torre 1, 6º andar, Asa Norte, CEP [ZIP Code] 70040-912.

1.4. Members of the Personnel and Compensation Committee:

- (a) **Francisco Augusto da Costa e Silva**, Brazilian, married, Lawyer, bearer of RG [ID] No. 2.233.546 IFP/RJ and enrolled under CPF/ME [Individual Taxpayer Registry] No. 092.297.957-04, with business address at Avenida Rio Branco, 110, 39º e 40º andares, city and state of Rio de Janeiro, CEP [ZIP Code] 20040-001;
- (b) **Vinicius Urias Favarão**, Brazilian, married, Banker, bearer of RG [ID] No. 19.674.792-2 SSP/SP and enrolled with CPF [Individual Taxpayer Registry] No. 177.975.708-50, with business address at **Núcleo Cidade de Deus, Vila Yara, Osasco, state of São Paulo, CEP [ZIP Code] 06029-900;**
- (c) **Thiago Affonso Borsari**, Brazilian, married, Banker, bearer of RG [ID] No. 30931594, enrolled under CPF/ME [Individual Taxpayer Registry] No. 305759718-19, with business address in the city of Brasília, Federal District, at SAUN, Quadra 5, Lote B, Edifício Banco do Brasil, Torre 1, 6º andar, Asa Norte, CEP [ZIP Code] 70040-912.

1.5. Members of the Risk Committee:

- (a) **Carolina Beghelli**, Brazilian, married, Banker, bearer of RG [ID] No. 1.999.400, enrolled under CPF/ME [Individual Taxpayer Registry] No. 721.954.601-72, with

business address in the city of Brasília, Federal District, at SAUN, Quadra 5, Lote B, Edifício Banco do Brasil, Torre 1, 6º andar, Asa Norte, CEP [ZIP Code] 70040-912.

- (b) **Glaucio Nery Henrique**, Brazilian, married, Banker, bearer of RG [ID] No. 69588, enrolled under CPF/ME [Individual Taxpayer Registry] No. 994.868.817-15, with business address in the city of Brasília, Federal District, at SAUN, Quadra 5, Lote B, Edifício Banco do Brasil, Torre 1, 6º andar, Asa Norte, CEP [ZIP Code] 70040-912.
- (c) **Marcelo Souza Ramos**, Brazilian, married, Banker, bearer of RG [ID] No. 290389513, enrolled under CPF/ME [Individual Taxpayer Registry] No. 213.476.688-37, with business address in the city of Osasco, state of São Paulo, at Núcleo Cidade de Deus, Vila Yara, CEP [ZIP Code] 06029-900;
- (d) **Regina Helena Jorge Nunes**, Brazilian, married, Business Administrator, bearer of RG [ID] No. 13.021.543-0 SSP/SP and enrolled under CPF/ME [Individual Taxpayer Registry] No. 112.946.628-05, with business address at Rua Pau Brasil, 324, Boaçava, in the city and state of São Paulo, CEP [ZIP Code] 05471-030;
- (e) **Valdecir Cícero de Souza**, Brazilian, married, Business Administrator, bearer of RG [ID] No. 32.981.560-x, enrolled under CPF/ME [Individual Taxpayer Registry] No. 221.011.318-03, with business address in the city of Osasco, state of São Paulo, at Núcleo Cidade de Deus, Vila Yara, CEP 06029-900;

1.6. Members of the Sustainability Committee:

- (a) **Fernando José Costa Teles**, Brazilian, married, Engineer, bearer of RG [ID] No. 57.907.495-X SSP/SP and enrolled under CPF/ME [Individual Taxpayer Registry] No. 858.058.237-72, residing at Rua Redentor, 119, 4º andar, Ipanema, in the city and state of Rio de Janeiro, CEP [ZIP Code] 22421-030.
- (b) **Fernando Pinto Lima**, Brazilian, married, Business Administrator, bearer of RG [ID] No. 18.310.052-0 SSP/SP, enrolled under CPF/ME [Individual Taxpayer Registry] No. 157.549.858-86, with business address in the city of Barueri, state of São Paulo, at Alameda Xingu, nº 512, 31º andar, Alphaville, Centro Industrial e Empresarial, CEP [ZIP Code] 06455-030;
- (c) **Gabriel Maceron Santamaria**, Brazilian, married, Banker, bearer of RG [ID] No. 44.996.866-2, enrolled under CPF/ME [Individual Taxpayer Registry] No. 340.155.978-85, with business address in the city of Brasília, Federal District, at SAUN, Quadra 5, Lote B, Edifício Banco do Brasil, Torre 1, 6º andar, Asa Norte, CEP [ZIP Code] 70040-912;
- (d) **Marcelo Pasquini**, Brazilian, married, Engineer, bearer of RG [ID] No. 24.581.471-1, enrolled under CPF/ME [Individual Taxpayer Registry] No. 173.318.958-00, with business address at Núcleo Cidade de Deus, Vila Yara, Osasco, state of São Paulo, CEP [ZIP Code] 06029-900;
- (a) **Regina Helena Jorge Nunes**, Brazilian, married, Business Administrator, bearer of RG [ID] No. 13.021.543-0 SSP/SP and enrolled under CPF/ME [Individual Taxpayer Registry] No. 112.946.628-05, with business address at Rua Pau Brasil, 324, Boaçava, in the city and state of São Paulo, CEP [ZIP Code] 05471-030.

Drafting and Reading of the Minutes: Without further ado, the meeting was paused and these Minutes were drafted. Once the meeting resumed, these Minutes were read, approved and signed by all attendees.

Signatures: Officers: Mr. José Ricardo Fagonde Forni, Chair; Mrs. Tatiane Zornoff Vieira Pardo, Secretary. Members of the Company's Board of Directors: José Ricardo Fagonde Forni, Marcelo de Araújo Noronha, Aldo Luiz Mendes, Carlos Motta dos Santos, Ênio Mathias Ferreira, Francisco da Costa e Silva, Francisco José Pereira Terra, Marco Aurélio Picini de Moura and Vinicius Urias Favarão.

I certify that these minutes are a true and accurate copy of the minutes recorded in the Company's book of minutes.

Barueri, May 25, 2022.

TATIANE ZORNOFF VIEIRA PARDO
Secretary

Exhibit I belongs to the Abstract of Minutes of the Ordinary Meeting of the Board of Directors of Cielo S.A. held on May 25, 2022.

Title:	ANTICORRUPTION	Code:	PLT_001
VPE:	Risk, Compliance, Prevention and Security	Version:	07

Revision History

Version:	Approval Date:	History:
01	17/12/2013	Preparation of the Document
02	26/06/2015	Concept adaptation in the following items: Purpose (I), Scope (II) and the title of item 2; Inclusion of the item Supplementary Documentation (III) and Responsibilities (V); Inclusion of the word "anonymously" in the definition of the Ethics Channel, "Private" in the definition of Corruption and the definition of Stakeholders in the item Concepts and Acronyms (IV); Inclusion of items 2.2 and General Provisions (VIII).
03	30/10/2017	Update of items I. Purpose, II. Scope, III. Supplementary Documentation, IV. Concepts and Acronyms, V. Responsibilities and sub-items 1.3, 2.1.1, 2.3.1, 3.1, 3.3 and 4.1 of VI. Guidelines; Inclusion of sub-items 2.1, 2.2 to 2.3, 2.3.2 to 2.4.2 and 4.2 to 5.1 of VI. Guidelines.
04	05/07/2018	Update of items I. Purpose, II. Scope, IV. Consequence Management, V. Responsibilities, VI. Supplementary Documentation, VII. Concepts and Acronyms and the following sub-items of III. Guidelines: 1.3.2, 1.3.3, 2.2 and 3.2.
05	19/02/2020	Update of items I. Purpose, II. Scope, III. Guidelines sub-items 1.1.1, 1.2.1, 1.3, 1.3.2, 1.3.3, 1.3.4, 1.4.1, 1.4.2, 2.1, 2.3 and 4.1, IV. Consequence Management, V. Responsibilities, VI. Supplementary Documentation, VII. Concepts and Acronyms and VIII. General Provisions.
06	25/02/2021	Update of items I. Purpose, II. Scope, III. Guidelines, IV. Consequence Management, V. Responsibilities, VI. Concepts and Acronyms.
07	25/05/2022	Update of items: I. Purpose, II. Scope, III. Guidelines sub-items 5.1, 5.2, 6, 8.1, 8.2, 8.3, 9.2, 10.1, 11, 12, 12.2, 13.1, 13.2, 14.1, 14.2, IV. Consequence Management, V. Responsibilities and Concepts and Acronyms.

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I. Purpose

This Anti-Corruption Policy ("Policy") aims to establish Cielo S.A.'s main guidelines and position regarding the repudiation and combat of all forms of corrupt conduct, such as bribery, embezzlement and the granting of undue advantages, as well as the concealment or dissimulation of these acts and the hindering of investigation and inspection activities.

II. Scope

All members of the Board of Directors, Advisory Committees and Executive Board ("Officers"), members of the Fiscal Council and employees of Cielo S.A., Servinet Serviços Ltda., Aliança Pagamentos e Participações Ltda. and Stelo S.A., hereinafter referred to as "Company".

All the Company's Subsidiaries must define their directions based on the guidelines set forth in this Policy, considering the specific needs and the legal and regulatory aspects to which they are subject.

With respect to the Affiliated Companies, the Company's representatives who act in managing its Affiliated Companies must make every effort to define their directions based on the guidelines set forth in this Policy, considering the specific needs and the legal and regulatory aspects to which they are subject.

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III. Guidelines

1. Anti-Corruption Law and Acts Harmful to Public Administration

1.1. The Company does not adopt, encourage and/or allow the practice of any conduct that constitutes or results in harmful acts to the Public Administration, national or foreign, and other private companies, observing the provisions of Law No. 12.846/2013 ("Anti-Corruption Law") , according to an exhaustive and non-explanatory list:

- promise, offer or give, directly or indirectly, undue advantage to a public official, or a third party related thereto;
- finance, fund, sponsor or otherwise subsidize the practice of unlawful acts provided for in this law;
- use an individual or legal entity as an intermediary to hide or conceal their real interests or the identity of the beneficiaries of the acts performed;
- hinder investigation or inspection activities of public agencies, entities or officials, or intervene in their operation, including within the scope of regulatory agencies and inspection bodies of the national financial system;
- regarding bids and contracts:
 - disrupt or defraud, by means of adjustment, combination or any other device, the competitive nature of a public bidding procedure;
 - prevent, disturb or defraud the performance of any act of a public bidding procedure;
 - remove or seek to remove a bidder, through fraud or by offering an advantage of any kind;
 - defraud public bidding or the resulting contract;
 - fraudulently or irregularly create a legal entity to participate in public bidding process or enter into an administrative agreement;
 - fraudulently obtain undue advantage or benefit from modifications or extensions of agreements entered into with the public administration, without authorization by law, in the summoning act of the public bidding process or in the respective contractual instruments; or
 - manipulate or defraud the economic and financial balance of agreements entered into with the public administration.

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2. Interactions with Public Officials

- 2.1. Interactions between officers, employees, as well as those who act as representatives of the Company, with public officials must take place in accordance with the guidelines established in an internal standard that governs the relationship with the Public Administration.

3. Bidding Process

- 3.1. The Company's participation in bidding processes must take place in accordance with the guidelines established in the Bidding Standard.

4. Private Corruption

- 4.1. Although private corruption has no legal provision in the Brazilian legal system, the Company does not adopt, encourage and/or allow the practice of any conduct that constitutes the following acts: offering, promising, delivering or paying, directly or indirectly, an undue advantage to a partner, director, administrator, employee or representative of a legal entity governed by private law.
- 4.2. Likewise, the Company's officers, employees, interns and young apprentices must not accept undue advantages.

5. Contributions, Donations and Sponsorships to Candidates for Public Office or to Political Parties

- 5.1. The Company does not make contributions, directly or indirectly, whether through donation or the loaning of assets, use or assignment of physical or advertising space, sponsorship of events, assignment of labor and/or any other resource, distribution of pamphlets, sending electronic messages, displaying posters, or in any other way, to political campaigns, political parties, candidates for public office or any other type of organization engaged in political activity.
- 5.2. Although donations by individuals are not prohibited by law, the Company recommends that all those holding statutory positions refrain from making personal donations to election campaigns, including those who are in their circle of economic dependence.

6. Donations of Assets and Sponsorship of Social, Cultural and Sports Projects

- 6.1. The donation of property, plant and equipment and intangible assets to social organizations, philanthropic entities, associations or non-profit institutions is

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allowed and is only made following the proper evaluations and approvals, according to guidelines established in internal standards.

- 6.2. The Company only sponsors social, cultural and sports projects after evaluations and approvals by the competent governance areas and bodies, according to guidelines established in internal standards.

7. Candidates for Public Office

- 7.1. Employees who run for political office must take leave from their activities at the Company, without pay, during the period between the registration of their candidacy before the Electoral Court and the day after the election.

8. Acceptance and Offering of Courtesies

- 8.1. The Company is against the direct and indirect acceptance and offer of favors such as promotional gifts, presents and invitations to events, which may affect decisions, facilitate business or benefit third parties.
- 8.2. Among other restrictions, the acceptance or offer of favors involving the Public Administration or Public Agents is prohibited.
- 8.3. The acceptance and offer of favors must follow the rules established in the Code of Ethics, this Policy, the Purchasing Policy, the internal Standards on Acceptance and Offer of Favors, as well as be in line with the Cielo Compliance Program.

9. Corporate Restructuring

- 9.1. During any merger and acquisition process in which the Company participates, due diligence must be conducted on the target company in order to ensure, among other aspects, compliance with the requirements of the Anti-Corruption Law. The purchase and sale agreement or other document that has the same purpose as this agreement must contain specific anti-corruption clauses and, in the case of mergers and acquisitions, it must be expressly stated that the transferee is responsible for the acts and facts that occurred prior to the date of the merger or acquisition, except in the case of duly proven simulation or evident intent of fraud.
- 9.2. Any violation identified in the merger and acquisition process must be reported to the Vice-Presidency of Risk, Compliance, Prevention and Security for risk analysis and assessment.

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10. Corruption Risk Management

10.1. The Company has an internal methodology that provides subsidies to (a) identify, (b) measure and assess, (c) monitor, (d) mitigate and (e) report exposure to the risk of corruption for communication, appraisal and deliberation by the Company's competent corporate governance bodies, according to the respective area of operation, as well as the regulatory bodies.

11. Mechanisms and Processes for Preventing and Combating Corruption

11.1. The Company actively acts in the prevention and fight against corruption, leading initiatives in that direction:

- 11.1.1. It has established normative instruments related to the topic of integrity and fight against corruption, which establish guidelines, procedures, roles and responsibilities on the processes that support the Cielo Compliance Program;
- 11.1.2. Through automated systems, it monitors all client transactions, identifying cases with signs of financial crimes and illegal acts, such as corruption, money laundering and terrorist financing;
- 11.1.3. All of the Company's agreements with its suppliers, service providers and partners must include anti-corruption clauses;
- 11.1.4. It adopts procedures for the development of new products and services, as well as the use of new technologies, in order to assess the risk and prevent their use in practices associated to corruption, money laundering and terrorist financing;
- 11.1.5. It adopts due diligence procedures such as *Know Your Customer*, *Know Your Supplier*, *Know Your Partner* and *Know Your Employee*, in order to mitigate the risks of corruption, money laundering and terrorist financing, in accordance with the activity, jurisdiction and parties involved, including the collection, verification, validation and updating of registration information;
- 11.1.6. It adopts restrictive measures regarding the conduct of business and the maintenance of relationships with customers, suppliers, partners and employees, when circumstances indicate evidence of involvement in

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crimes of corruption, money laundering and terrorist financing, or any other illegal acts, observing the limits of the current legislation;

- 11.1.7. It adopts procedures for the identification and approval of the maintenance of the business relationship with customers, partners and service providers that may be considered Politically Exposed Persons ("PEP") or related to them;
- 11.1.8. It pays special attention to the monitoring of operations or proposals for operations involving PEP, as well as family members, close employees and/or legal entities in which they participate;
- 11.1.9. During the election period, the Company adopts additional procedures seeking to identify evidence of suspicious activity and/or irregular donations to candidates; and
- 11.1.10. It determines that the action plans for remediation and/or liability for deviations that have taken place are monitored and reported, allowing to work on the exposed weaknesses, promoting the continuous improvement of the Company's processes.

12. Encouraging the reporting of acts harmful to the Public Administration and acts of private corruption, committed by the Company's officers, employees, and other stakeholders of this Policy.

- 12.1. The Company encourages and supports, without limitation, the reporting of any act or omission that may constitute a violation of the Code of Ethics or current legislation, including the Anticorruption Law, committing to investigate, punish and/or notify the competent authorities, as rigorously as possible, of any misconduct that may be reported to the Company.
- 12.2. If irregularities committed or damage caused to the Company are detected, it will act promptly to stop the irregularities, applying an adequate and timely solution. Furthermore, detected irregularities in the value chain will be corrected and necessary measures will be applied in order to correct and ensure that they do not reoccur.
- 12.3. Whenever possible and with the best diligence, the Company will seek to individualize and specify conduct that may be classified as a punishable crime in accordance with current legislation, notifying and collaborating with the competent

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authorities for full investigation and accountability of the individuals who commit them.

12.4. The complaint must be made, preferably, through the Ethics Channel, without excluding any means or channel available to the complainant in the event of an impossibility of accessing said channel.

12.5. All reports received and processed by the Ethics Channel, even when not anonymous, will be treated confidentially. The receipt of these reports is managed by an independent company to ensure confidentiality and record verification is managed by the Company's Internal Audit, without prejudice to the notification of and collaboration with other competent authorities as required.

12.6. In the event that Managers and/or employees are involved in investigations of acts of corruption, any applicable measures, such as removal, will be evaluated and decided upon by the Company's governance bodies, as applicable.

13. Disclosure

13.1. This Policy and its respective updates will be made known to all stakeholders, without exception, at least annually. This Policy is available on the intranet and on the Company's investor relations website.

13.2. All suppliers must accept the document entitled "Cielo's Terms and Policies", which includes acceptance of the rules established in the Code of Ethics and the Anti-Corruption Policy, among other documents.

14. Training

14.1. As part of the Cielo Compliance Program, all employees, trainees and young apprentices must undergo mandatory annual anti-corruption training.

14.2. The training is available at Cielo University in the *e-learning* format, except for the members of the Executive Board, whose training will be held in meetings of the board itself.

IV. Consequence Management

Employees, suppliers or other stakeholders who observe any deviations from the guidelines of this Policy may report the fact to the Ethics Channel through the channels below, with the option of anonymity:

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- www.canaldeetica.com.br/cielo
- Phone, toll-free: 0800 775 0808

Internally, non-compliance with the guidelines of this Policy gives rise to the application of accountability measures to the agents that fail to comply with it, according to the respective severity of the non-compliance and as per internal regulations, and is applicable to all persons described in the item "Scope" of this Policy, including the leadership and members of the Executive Board.

V. Responsibilities

- **Officers and Employees:**
 - Observe and ensure compliance with this Policy as well as the provisions of the Code of Ethics and, when necessary, call the Vice Presidency of Risk, Compliance, Prevention and Security for consultation on situations involving conflict with this Policy, or upon the occurrence of situations described herein.
- **Third Parties, Suppliers, Service Providers and Partners:**
 - Observe and ensure compliance with this Policy as well as the provisions of the applicable Code of Ethics and, when necessary, use the available channels at the Company for consultation on situations involving conflict with this Policy, or upon the occurrence of situations described herein.
- **Risks, Compliance, Prevention and Security Vice-Presidency:**
 - Monitor compliance with the guidelines established herein, review it annually, keep it updated to ensure that its content reflects any changes in the Company's direction and supports any doubts regarding the content and its application.
- **Superintendency of Efficiency and Purchasing:**
 - Perform the Know Your Supplier process at the time of prospecting, selection, hiring and monitoring with quality and suitability criteria, according to internal standards and procedures.
 - Notify the Vice-Presidency of Risk, Compliance, Prevention and Security of any evidence of corruption by suppliers and service providers, when identified.

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- Keep the registration updated, approve the suppliers and service providers, as established in the internal processes, and request formal acceptance acknowledgement from relevant suppliers for the guidelines established in the Code of Ethics and in the Anti-Corruption Policy.
- **Legal and Government Relations Advisory Office:**
 - Advise the Company on the applicability, interpretation and updating of laws or regulations related to the topics of this Policy.
 - Prepare contracts with suppliers, service providers and partners addressing anti-corruption clauses.
- **Superintendence of Strategy and Performance:**
 - Ensure the completion of the due diligence process, within the context of merger and acquisition transactions, when the Company is the acquirer, which includes checks associated with compliance with the requirements of the Anti-Corruption Law.
- **Audit Superintendence:**
 - Independently assess the rules and procedures established in this Policy, mitigating the risks as to management, controls and internal processes and investigate cases of complaints and report to the Ethics Forum, Audit Committee and the Board of Directors.

VI. Supplementary Documentation

- Código de Conduta Ética;
- Decreto nº 8.420/2015 (Regulamenta da lei 12.846/2013);
- Decreto nº 2.848/1940 (Código Penal);
- Decreto nº 7.592/2011;
- Instrução Normativa CGU nº 01/2015;
- Instrução Normativa CGU nº 02/2015;
- Lei nº 8.429/1992 (Lei de Improbidade Administrativa);
- Lei nº 8.666/1993 (Lei Geral de Licitações);

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- Lei nº 12.846/2013 (Lei Anticorrupção);
- Normas e procedimentos internos aperfeiçoados constantemente, aprovados pelas alçadas competentes e disponibilizados a todos os colaboradores;
- Política de Compliance;
- Política de Compras;
- Política de Sustentabilidade;
- Portaria CGU nº 909/2015;
- Portaria CGU nº 910/2015;
- Princípio 10 do Pacto Global.

VII. Concepts and Acronyms

- **Public administration:** the set of agencies, services, and entities of the direct and indirect public administration (foundations, autarchies, public companies, and mixed-economy companies), and their respective officials. This concept, for the purposes of this Policy, encompasses the entire State structure, at all its levels (Federal, State and Municipal) and powers (Executive, Legislative and Judiciary) to provide public services, manage public assets and community interests, as well as their respective representatives.
- **Public Official:** Every individual who represents the public power, being a public employee or not, paid or unpaid, exercising temporary or permanent service. It includes everyone who exercises, even if temporarily or without remuneration, by election, nomination, designation, contracting or any other form of investiture or relationship, a mandate, position, job, or public function. Those who work for a private company hired or contracted for the execution of activities that are typical of the Public Administration are considered Public Officials.
- **Harmful Acts:** They are any acts or omissions that cause direct or indirect damage to the public interest and/or assets to the detriment of the interest of third parties and that go against the principles of Public Administration (e.g. impersonality, morality, efficiency, legality and publicity) and the international commitments assumed by Brazil.

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- **Ethics Channel:** Channel made available by the Company to its employees, suppliers, service providers, partners, or other stakeholders to report or provide information, anonymously or identified, about any deviations from Cielo's Code of Ethics or legislation in force, including the Anti-Corruption Law.
- **Code of Ethics:** Document that establishes the principles that should guide the relationships and activities related to the different stakeholders involved in the Company's business, addressing the principles of integrity, transparency, compliance with the desired legislation and conduct. It also establishes the relationship with stakeholders, including public authorities, and provides for disciplinary sanctions in situations of violation of conduct.
- **Board of Directors:** Collegiate decision-making body that aims to satisfy the duties of guiding and supervising the management of the Executive Board and deciding on major business issues, including making strategic, investment, and financing decisions, among other matters provided for in article 142 of the Brazilian Corporation Law and/or the Company's Bylaws.
- **Corruption:** The act or effect of corrupting oneself, offering something to a Public or Private Official for the purpose of obtaining an undue advantage for oneself or for others. The action of corrupting can also be understood as the result of bribing, giving money or undue advantages to someone in exchange for special self-interest benefits. Corruption is an illegal means of achieving something.
- **Bidding:** Formal administrative procedure whereby the Public Administration, directly or indirectly, selects the most advantageous proposal for the contracting of services or acquisition of products.
- **Governance Bodies:** Bodies that make up the Company's Corporate Governance System, such as: Board of Directors, Advisory Committees, Executive Board, Advisory Forums, among others.
- **Cielo Compliance Program:** Brings together the efforts made in the scope of the Compliance Program and the Company's Integrity Program, for the purpose of expanding the action beyond the specific scope of Compliance, creating a synergy to enable the ethical, risk and compliance culture as a whole. Considered to be a system, by directing efforts, enabling communication between the Company and its different audiences, it allows the maintenance of a robust compliance environment in the Company.

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- **Kickback:** Synonymous with bribery. Additional bonus paid to someone for normal service provided; amount offered or paid to someone to induce them to commit unlawful acts; amount offered to someone in exchange for favors.
- **Risk of Corruption:** Possibility that officers, employees or third parties representing the Company: promise, offer or give, directly or indirectly, an undue advantage to a (i) public official; (ii) partner, manager, officer, employee or representative of a private legal entity; or (iii) a third party related to them, for the purpose of obtaining an undue advantage for themselves, for others or for the Company; that finance, fund, sponsor or in any way subsidize the practice of the unlawful acts set forth in Law no. 12.846/2013; and that use an individual or legal entity to hide or disguise their real interests or the identity of the beneficiaries of the acts committed.
- **Affiliates:** companies in which the Company has significant influence, whereby, pursuant to article 243, paragraph 4 and paragraph 5 of the Corporation Law, (i) there is significant influence when the Company holds or exercises the power to participate in the financial or operating policy decisions of a company, without, however, controlling it; and (ii) significant influence will be presumed when the Company holds 20% (twenty percent) or more of the voting capital of the corresponding company, without, however, controlling it.
- **Subsidiaries:** companies in which the Company, directly or indirectly, holds partner or shareholder rights that assure it, on a permanent basis, preponderance in the corporate decisions and the power to elect the majority of the managers, under the terms of article 243, paragraph 2 of the Brazilian Corporation Law.
- **Stakeholders:** all relevant target audiences with interests pertinent to the Company, as well as individuals or entities that assume some type of risk, direct or indirect, with respect to the company. Among others, the following are highlighted: shareholders, investors, employees, society, clients, suppliers, creditors, governments, regulatory bodies, competitors, press, associations and class entities, users of electronic means of payment, and non-governmental organizations.
- **Bribery:** Unlawful act consisting in the action of inducing someone to perform a particular act in exchange for money, material goods or other particular benefits. Bribe is considered to be any offer, payment or promise of undue advantage to (i) public agent; or (ii) partner, manager, administrator, employee or representative of a private legal

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entity; in exchange for favors done by them that benefits the corrupt individual in a particular way.

- **Undue Advantage:** Any kind of advantage promised, offered or provided to a (i) public agent; (ii) partner, manager, administrator, employee or representative of a private legal entity; or (iii) third parties related to them, in exchange for or expectation of benefit or favor, exclusive or not, to itself, to the Company or to any related third party. The undue advantage is characterized by cash payments or offering of material goods or commercial amenities such as: meals, gifts, trips, entertainment, lodging, job offers or other business favors, which characterize infringement when associated with an improper interest (for example, when the agent in question has power to interfere in a procedure of interest to the company, such as obtaining a license or deciding on an administrative appeal).

VIII. General Provisions

The Company's Board of Directors is responsible for altering this Policy whenever necessary.

This Policy takes effect on the date of its approval by the Board of Directors and revokes any documents to the contrary.

Barueri, May 25, 2022.

Cielo S.A.

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Exhibit II belongs to the Abstract of Minutes of the Ordinary Meeting of the Board of Directors of Cielo S.A. held on May 25, 2022.

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Revision History

Version:	Approval Date:	History:
01	26/06/2015	Preparation of the Document.
02	07/07/2017	Inclusion of item IV. Concepts and Acronyms and sub-item 1.1.10 of item VI. Guidelines; Update of items II. Scope, III. Supplementary Documentation and V. Responsibilities.
03	29/10/2019	Update of items II. Scope, III. Guidelines sub-items 1.1, 1.3, 2.4, 2.5, 3.1, 4.1, 5.1 and 6.1, V. Responsibilities, VI. Supplementary Documentation, VII. Concepts and Acronyms and VIII. General Provisions; Inclusion in item III. Guidelines of sub-items 4.2, 4.3 and 4.4.
04	29/04/2020	Update of items I. Purpose, II. Scope, III. Guidelines of sub-items 1, 1.1, 2, 2.1, 2.2, 2.2.1, 2.2.2, 2.3, 3, 3.1, 4, 4.1, 5, 5.1, 6 and 6.1, IV. Consequence Management, V. Responsibilities, and VIII. Concepts and Acronyms. Inclusion of items 1.1.1, 1.1.2, 1.1.3, 1.1.4, 2.1.1, 2.1.2, 3.2, 3.2.1, 3.2.2, 3.2.3, 3.2.4, 3.2.5, 3.2.6, 3.2.7, 3.2.8, 3.3, 3.4, 3.5, 5.2, 5.3, 5.4, 7 and 7.1 in item III. Guidelines. Exclusion of sub-items 1.2, 1.2.1, 1.2.2, 1.3, 2.2.3, 2.2.4, 2.2.5, 2.2.6, 2.2.7, 2.2.8, 2.4, 2.5, 4.2, 4.3 and 4.4 from item III. Guidelines.
05	25/05/2022	General Document Update.

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VIII. Disposições Gerais9

I. Purpose

This Privacy and Data Protection Policy ("Policy") is intended to regulate the guidelines applicable to the privacy and protection of the personal data of customers, employees, third parties, service providers, suppliers and partners to whom Cielo S.A. has access based on the performance of its activities, establishing the applicable rules on the collection, registration, storage, use, sharing, enrichment and deletion of data, in accordance with good practices, regulations and legislation in force.

II. Scope

All members of the Board of Directors, advisory committees and executive board ("Directors"), members of the Fiscal Council and employees, regardless of position or function held, of Cielo S.A., Servinet Serviços Ltda., Aliança Pagamentos e Participações Ltda. and Stelo S.A., hereinafter referred to as the Company, as well as third parties, service providers and/or suppliers who have access to customer information of these companies.

All the Company's Subsidiaries must define their directions based on the guidelines set forth in this Policy, considering the specific needs and the legal and regulatory aspects to which they are subject.

With respect to the Affiliated Companies, the Company's representatives who act in managing its Affiliated Companies must make every effort to define their directions based on the guidelines set forth in this Policy, considering the specific needs and the legal and regulatory aspects to which they are subject.

III. Guidelines

1. Initial Provisions

1.1. This Policy aims to demonstrate the Company's commitment to:

- 1.1.1. Ensure the privacy and protection of personal data collected from customers, employees, third parties, service providers, suppliers and partners, based on the performance of their activities.
- 1.1.2. Adopt guidelines that ensure full compliance with good practices, regulations and laws relating to the protection of personal data.
- 1.1.3. Promote transparency about the way in which the Company handles personal data.
- 1.1.4. Take protective measures against the risk of security incidents involving personal data.

2. Information subject to the Policy

2.1. The following are subject to this Policy:

- 2.1.1. All information provided or collected in the context of the provision of services by the Company to its customers for acceptance of e-payments, including the capture, transmission, processing of information and settlement of transactions, as well as the provision of other services and related products.
- 2.1.2. All information from employees, third parties, service providers, suppliers and partners collected in the context of contractual or legal obligation.

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3. Personal data collected

- 3.1. The personal data collected may vary according to the relationship maintained with the Company and are classified into the following groups:
- 3.1.1. Information provided by the data subject: Information added or forwarded by the data subject or his/her legal representative, arising from the contact, registration or contract with the Company, which may include, but not limited to, the following data: full name, CPF [Individual Taxpayer Registry Number], date of birth, marital status, nationality, place of birth, names of parents, beneficiaries, profession, information about the company he/she is a partner, owner, legal representative, or agent, full address, bank information, email address, phone number, and biometric data.
 - 3.1.2. **Information collected from the use of the services:** Information related to the use of e-payments, captured by the Company and transmitted and/or shared with third parties in the context and limit necessary for the processing and settlement of electronic payment transactions or for the transmission of information related to non-financial transactions, subject to service provided.
 - 3.1.3. **Information collected from the use of websites and apps:** Information corresponding to accessing and browsing the Company's websites, pages and apps, containing information about identification of the device and connection (date, time and IP). Geolocation may also be collected to prevent fraud and security and credit protection.
 - 3.1.4. **Information collected from interactions on social media and platforms:** Information collected from interactions through the Company's media and/or social networks.
 - 3.1.5. **Financial information:** Information about the financial or credit status, such as income, equity, delinquency, positive registration data, and data from the Central Bank's Credit Information System, in accordance with applicable legislation.
 - 3.1.6. The Company will only process data from minors under the age of 18 pursuant to Article 14 of Law 13,709/2018 and the applicable legislation.

4. Method and purpose of collection

- 4.1. The information will be collected by ethical and legal means and stored in a secure and controlled environment, for the period required by applicable law or regulation. The Company agrees to take all reasonable measures to maintain absolute and strict confidentiality of all information, personal data or specifications to which it has access or that it may be aware of or gain knowledge regarding transactions, holders, data on cards and payment methods, from its customers, as well as individuals directly related to the customers, to which it gains access due to the provision of services by Company, employment, contractual or partnership relationship, being prohibited to assign and/or allow access by third parties to such information, except in the cases described in this Policy and determined by law.
- 4.2. The Company uses all information collected by filling out the registration, added by the user on its website or app, collected directly from customers or automatically, for the following purposes: (i) provision of services; (ii) expand offers for marketing and dissemination of products and services of interest to customers, employees and partners; (iii) customize and improve products and

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services offered; and (iv) prevent fraud and financial losses, among other cases that may deviate from conventional practices.

- 4.3. In some cases, the Company may also process personal data when necessary for compliance with legal or regulatory obligations or regular exercise of rights in judicial, administrative or arbitral proceedings.
- 4.4. The Company may also process personal data based on its legitimate interest, always to the limit of its expectation, and never to the detriment of the interests of the data subject, fundamental rights and freedoms.
- 4.5. The Company may process sensitive personal data for fraud prevention or for conducting research, in which case the anonymization of sensitive personal data will be guaranteed whenever possible. Furthermore, with the proper consent, in a specific and prominent manner.
- 4.6. The information collected may also be used for advertising purposes, such as for sending communications and news that are of interest to current and potential customers, and to third parties. In such cases, the goal will be to better serve the target audience by offering products that fit their needs and profile.
- 4.7. The information collected may also be used for profile analysis, identification, management and handling of potential risks then offering and contracting products and/or services and other risk management activities, also aiming at the safety of customers and users.
- 4.8. The Company may also collect and process the data to:
 - 4.8.1. Review activities related to credit protection, such as credit risk assessment and management, assessment of financial and equity status, collection, credit assignment, activities related to the information and consultation to credit protection entities and good credit rating score, among others.
 - 4.8.2. Comply with legal, regulatory and self-regulatory obligations, such as: internal audit and compliance activities, prevention of money laundering and terrorist financing, reports to the Internal Revenue Service, fraud prevention measures, provision of information to the Central Bank of Brazil and other competent bodies, in Brazil and abroad, reporting suspicious transactions to the COAF (Financial Activities Control Board), among other activities.
 - 4.8.3. Regular exercise of rights, including in judicial or arbitration proceedings to which the Company is a party.
 - 4.8.4. Execution of internal and managerial processes to make decisions about the operations, business, services, products, activities, and initiatives carried out by the Company;
 - 4.8.5. Transfer of information or sharing of data in cases of assignment of credit for debt collection.
 - 4.8.6. Other processing situations based on legitimate purposes, such as the support and promotion of activities or the provision of services that benefit customers.
 - 4.8.7. Promote events, carry out sponsorships and other activities and initiatives.

5. Relationship with third parties

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- 5.1. The access of third parties to the information collected by the Company is solely for the fulfillment of the purposes set out in this Policy and within the necessary limits for the performance of activities related to the course of its business, and may be carried out, including, but not limited to, with:
 - 5.1.1. Payment arrangement providers and members of such arrangements;
 - 5.1.2. Electronic funds transfer networks;
 - 5.1.3. Clearing and settlement banks;
 - 5.1.4. Service providers that perform commercial operations and/or information processing for the Company;
 - 5.1.5. Partners of the Marketing Superintendence;
 - 5.1.6. Independent auditors;
 - 5.1.7. Collection agencies, credit protection services and similar bodies;
 - 5.1.8. Competent regulatory bodies.
- 5.2. The use of the information collected by the Company, in any of the cases set out in item 5.1 above, is made exclusively to meet the purposes set forth in this Policy, in the performance of the Company's activities or in offering to the client specific content from the use of the information in a secure and comprehensive manner about its area of operation, in an encrypted manner whenever possible and anonymously when appropriate.
- 5.3. The Company may share information in a comprehensive manner, publicly and/or with its partners, provided that such information is not personally identifiable. For example, it can publicly share information to demonstrate trends in the overall use of its services and/or market trends and indices.
- 5.4. Whenever it becomes necessary to use the information collected by the Company for purposes other than those defined in this Policy or those expressly authorized by the data subject, the Company will inform the data subject directly about this new purpose and, when necessary, collect a new authorization.
- 5.5. Additionally, it is possible that some of the transfers indicated above may occur outside the Brazilian territory.
- 5.6. The recipient countries of personal data are: The United States and member countries of the European Union, and the Company undertakes to transfer data only to countries that provide a degree of protection to their personal data, considered to be appropriate to the provisions of applicable law; or by the adoption of guarantees and safeguards such as specific clauses, standard clauses, global corporate standards, among others; as well as prior collection of your specific consent or compliance with other circumstances authorized by law.
- 5.7. The Company requires all third parties to maintain the confidentiality of the information shared with them or to which they gain access based on the exercise of their activity, as well as to use such information exclusively for the purposes expressly permitted. However, the Company shall not be liable for the misuse of such information, either by third parties or their employees, due to non-compliance with this Policy and contractual obligations assumed through its own instruments.
- 5.8. The Company also requires all third parties contracted by it to comply with all obligations contained in this Policy, and the third parties will be subject to the

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same obligations as the Company, for the data processing activities performed, before the data subjects.

6. Information security

- 6.1. In order to secure the information collected and/or provided, the Company has physical, logical, technical and administrative security processes compatible with the sensitivity of the collected information, the efficiency of which is periodically evaluated by independent audit.
- 6.2. The Company implements new procedures and continuous technological improvements to protect all personal data collected.
- 6.3. The Company uses the latest methods and equipment available on the market to encrypt and anonymize personal data when necessary. Encryption allows us to protect data before it is transmitted over the internet. Encryption techniques make this information unreadable and prevent others from viewing it before reaching our technology environment.
- 6.4. The Company only authorizes specific persons to access the place where the personal information is stored, provided that this access is essential to the development of the intended activity.
- 6.5. The Company guarantees that employees, third parties or partners who perform the processing of personal data must agree to maintain absolute secrecy of the information accessed, as well as adopt best practices for handling this information, as determined in internal policies and standards.
- 6.6. In addition to technical efforts, the Company also adopts institutional measures aimed at the protection of personal data, so that it maintains a privacy governance program applied to its activities and structure.
- 6.7. Access to the information collected is restricted to employees and authorized persons. Those who misuse this information will be subject to applicable administrative, disciplinary and legal penalties.
- 6.8. Notwithstanding the security measures adopted, the Company is not liable for losses arising from the violation of the confidentiality of the information due to the occurrence of any fact or situation to which it is not attributable.
- 6.9. When processing the information collected, the Company uses structured systems to meet the security and transparency requirements, good practice and governance standards, and the general principles established in Law No. 13.709/2018, the General Personal Data Protection Law ("LGPD").
- 6.10. All technologies used will always comply with the current legislation and the terms of this Policy.

7. Rights of data subjects

- 7.1. In compliance with the applicable regulations, with regards to the processing of personal data, the Company respects and guarantees to the data subject the possibility of submitting requests based on the following rights:
 - Confirmation of the existence of processing;
 - Access to data;
 - Correction of incomplete, inaccurate or outdated information;

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- Anonymization, blocking or deletion of data that is unnecessary, excessive or legally noncompliant;
- Portability of the data to another service provider or product, upon express request by the User;
- Deletion of data processed with the User's consent;
- Obtaining information about the public or private entities with which the Company shared his/her data;
- Information on the possibility of the User not providing consent, as well as being informed about the consequences in case it is denied; and
- Withdrawal of consent.

7.2. Part of the above rights may be exercised directly by the data subject or his/her legal representative, as of the management of registration information, available in the logged-in area of the site, while another part will depend on sending a request to our Department of Data Protection and Privacy/Data Protection Officer (DPO), further evaluation and adoption of the necessary measures. The channel for receiving requests of this nature is the email: privacidade@cielo.com.br.

7.3. Any request for deletion of essential information for the management of registration with the Company will imply the termination of its contractual relationship, with the consequent cancellation of the services provided at that time, and the data may be kept in the Company's database, in order to comply with legal or regulatory orders.

8. Cooperation with regulatory authorities

8.1. In the case where it is necessary to disclose the personal data of customers, employees or partners, whether due to compliance with law, judicial order or competent body supervising the activities developed by the Company and/or third parties, such information shall be disclosed only in the strict terms and limits required for its disclosure, and the holders of the information disclosed, as far as possible, will be notified of such disclosure, so that they take appropriate protective or restorative measures.

9. Amendments

9.1. This Policy may be amended at any time, depending on the purpose or need for adequacy and compliance of the provision of law, regulation or whenever the Company deems necessary. Changes will be disclosed through *websites* www.cielo.com.br and <https://ri.cielo.com.br/>. The continued use of the services or the provision of services to the Company, as the case may be, after disclosure of the changes, will be considered acceptance of the client and third parties regarding the new terms and conditions.

IV. Consequence Management

Internally, non-compliance with the guidelines of this Policy gives rise to the application of accountability measures for agents who fail to comply with it, according to the respective severity of the non-compliance, and in accordance with internal regulations.

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Employees, suppliers or other stakeholders who observe any deviations from the guidelines of this Policy may report the fact to the Ethics Channel through the channels below, with the option of anonymity:

- Phone: 0800 775 0808
- <https://canaldeetica.com.br/cielo>

When an incident reported to the Ethics Channel involves personal data and/or sensitive personal data, the area responsible for the Ethics Channel must promptly report the complaint to the Data Privacy and Protection Officer (DPO).

V. Responsibilities

- **Administrators, employees and third parties:**
 - Observe and ensure compliance with this Policy and, when necessary, call the Data Privacy and Protection Officer (DPO) for consultation on situations involving conflict with this Policy, or upon the occurrence of situations described herein.
- **Risk, Compliance, Prevention and Security Vice-Presidency:**
 - Keep this Policy up-to-date to ensure that any regulatory/legal changes to the general guidelines and rules set forth herein are observed;
 - Answer questions regarding this Policy and its implementation;
 - Accept complaints and communications from data subjects, provide clarifications and take action;
 - Receive communications from the National Data Protection Authority ("ANPD") and take action;
 - Instruct the Company's employees and third parties regarding the practices to be taken in relation to the protection of personal data; and
 - Take initiatives to share information about incidents containing personal data with the ANPD and data subjects when necessary.
- **Legal and Government Relations Advisory Office:**
 - Answer questions regarding relevant legislation and regulations.

VI. Supplementary Documentation

- Article 5 of the Federal Constitution of 1988;
- [Cielo's Code of Ethics](#);
- Cielo Accreditation Contract;
- Supplementary Law No. 105/2001;
- Law No. 12.965/2014;
- Law No. 13.709/2018; and
- Internal standards that are constantly improved, approved by the competent approval authority, and provided to all employees.

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VII. Concepts and Acronyms

- **Clients:** Individual who has registered in the Company's system, to whom the personal data that are the object of work refer;
- **Personal data:** Any information related to the identified or identifiable individual, such as: first name, last name, date of birth, personal documents (CPF [Individual Taxpayer Registry], RG [ID], CNH [Drivers License], Employment Record Card, passport, voter registration card, among others), home or business address, phone, email, cookies and IP address;
- **Sensitive personal data:** Any personal data on racial or ethnic origin, religious belief, political opinion, membership to a trade union or religious, philosophical or political organization, data concerning health or sexual life, genetic or biometric data, when linked to an individual;
- **Data Privacy and Protection Officer (DPO):** Person appointed by the Company to act as a communication channel between the holders of the personal data and the National Data Protection Authority ("ANPD");
- **Information:** Data, processed or not, that can be used for production and transmission of knowledge, contained in any medium or format;
- **Protection of Personal Data:** Guarantee to data subjects the rights of access, correction, control and confidentiality of information. **Affiliates:** Companies in which the Company holds 10% (ten percent) or more of their capital, without, however, controlling them, under the terms of article 243, paragraph 1 of the Brazilian Corporation Law.
- **Subsidiaries:** Companies in which the Company, directly or indirectly, holds partner or shareholder rights that assure it, on a permanent basis, preponderance in the corporate decisions and the power to elect the majority of the managers, under the terms of article 243, paragraph 2 of the Brazilian Corporation Law.
- **Stakeholders:** all relevant target audiences with interests pertinent to the Company, as well as individuals or entities that assume some type of risk, direct or indirect, with respect to the company. Among others, the following are highlighted: shareholders, investors, employees, society, clients, suppliers, creditors, governments, regulatory bodies, competitors, press, associations and class entities, users of electronic means of payment, and non-governmental organizations.
- **Third parties:** Individual or legal entity, public or private, who provides services to the Company, on its premises or remotely, and who, in the exercise of their activities, may gain access to information related to the business of the Company or its Clients.
- **Data subject:** Individual to whom the personal data object of processing refer.

VIII. General Provisions

The Company's Board of Directors is responsible for altering this Policy whenever necessary. This Policy takes effect on the date of its approval by the Board of Directors and revokes any documents to the contrary.

Barueri, May 25, 2022.

Cielo S.A.

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*Exhibit III belongs to the Abstract of Minutes of the Ordinary Meeting of the Board of Directors of Cielo S.A.
held on May 25, 2022.*

Title:	SUSTAINABILITY	Code:	PLT_013
VPE:	People, Management and Performance	Version:	06

Revision History

Version:	Approval Date:	History:
01	03/06/2013	Preparation of the document.
02	26/06/2015	Unification with the Corporate Responsibility policy. Adequacy of Objective (I) and Guidelines (VI). Inclusion of the items Scope (II), Supplementary Documentation (III), Concepts and Acronyms (IV), Responsibilities (V), Consequence Management (VII), and General Provisions (VIII).
03	06/05/2016	Change of the VPE responsible for the Policy on Institutional Relations for Organizational Development; Update of the items on Supplementary Documentation (III) and the following items of Guidelines (VI): 3.1, 3.2, 8.3 and 8.5; Inclusion of items 3.3, 3.5, 4.3 and 9.2 of Guidelines (VI).
04	07/06/2018	Update of items: Objective (I); Scope (II); Guidelines (III): 1.1 and 1.2; 2.3; 3, 3.2, 3.3; 5.2; 6.3, 6.4; 8.1, 8.2, 8.3, 8.4, 8.5, 8.6, 8.7; and 10.1; Responsibilities (V) and Supplementary Documentation (VI).
05	29/06/2020	Change of items I. Objective; II. Scope; III. Guidelines – subitems 1.1, 2.1, 2.2, 3.1, 3.3., 3.4, 3.5, 5.1, 6.1, 6.2, 6.3, 7.1, 8.1, 8.2, 9., 9.1, 9.2, 10.1; V. Responsibilities; VI. Supplementary Documentation; VII. Concepts and Acronyms.
06	25/05/2022	General Document Update.

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I. Purpose

This Sustainability Policy ("Policy") aims to reaffirm the commitment of Cielo S.A., a technology and service provider company, with sustainable development, establishing guidelines for the insertion of social, environmental, climate, human rights and governance aspects, which are included in the ESG (*Environmental, Social and Governance*) practices of its businesses. In addition, this Policy also aims to fulfill the Company's purpose and Vision of Sustainability, as described in item III, Guidelines.

II. Scope

All members of the Board of Directors, Advisory Committees and Executive Board ("Officers"), members of the Fiscal Council and employees, regardless of job post or function, of Cielo S.A., Servinet Serviços Ltda., Aliança Pagamentos e Participações Ltda. and Stelo S.A., hereinafter referred to as "Company".

All the Company's Subsidiaries must define their directions based on the guidelines set forth in this Policy, considering the specific needs and the legal and regulatory aspects to which they are subject.

With respect to the Affiliated Companies, the Company's representatives who act in managing its Affiliated Companies must make every effort to define their directions based on the guidelines set forth in this Policy, considering the specific needs and the legal and regulatory aspects to which they are subject.

III. Guidelines

Cielo S.A.'s sustainability purpose:

Enhance sustainable and inclusive business with everyone.

Cielo S.A.'s sustainability vision:

To be the smart platform recognized for boosting sustainability and inclusion in Brazilian trade.

The Company seeks to fulfill the purpose of sustainability through strategic guidelines for sustainability, organized in three pillars (Operation, Business and Society), which are subdivided into nine guidelines, as described and distributed below:

A - Operation - promote sustainable operations, resources and structures

1. Promote diversity and inclusion in the representation of people and in corporate culture

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- 1.1. The Company considers that respect for the diversity of ideas is in its way of being, and this is reflected in the attitude of all its Officers and employees. The company does not tolerate physical and/or verbal aggression, disrespect, embarrassment and/or humiliation as set out in its Code of Ethics.
- 1.2. The Company values and is committed to promoting and protecting human rights and fundamental freedoms in all its business relationships. The Company follows the principles of the Universal Declaration of Human Rights and values the right to life, freedom of expression and safety, as such principles are the basis for justice, freedom and peace.
- 1.3. The Company is a signatory to the United Nations Global Compact. The commitment to Human, Labor, Environmental and Anti-Corruption Rights is a reference not only for employees, interns and Officers, but also for Subsidiaries, affiliates, and other stakeholders with whom the Company engages.
- 1.4. The Company recognizes that the social, economic and cultural context in which it operates poses structural barriers that compromise fair and equal access to people. The Company will make efforts to correct these differences and seek to ensure that equal opportunities offer greater social inclusion in its selection and career development processes, acting strongly through its six commitments to the topic of Diversity and Inclusion, as set out in its Diversity and Inclusion Policy.

2. Maximize eco-efficiency across all activities

- 2.1. The development and performance of the Company's economic activities are in compliance with legal and other requirements applicable to environmental issues, in accordance with the applicable legislation.
- 2.2. The Company seeks to implement the best environmental management practices with a preventive approach in order to mitigate potential environmental impacts arising from its operations, products and services, seeking the continuous improvement of its processes.
- 2.3. Natural resources are used responsibly, and internal measures are adopted to rationalize the use of non-renewable resources, prioritizing and promoting water and energy efficiency, reuse of materials, and proper management of waste and disposable materials.
- 2.4. The Company encourages the preservation of the environment, through technological innovation and seeks the conservation of biodiversity, ensuring that socio-environmental aspects are identified and monitored during the development cycle of activities, products and services, in order to prevent the occurrence of significant impacts, arising from its operations, using ecosystem services in a sustainable way.

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2.5. The Company contributes to the fight against climate change, through a strategy to measure impacts, reduce emissions, set targets, offset unavoided emissions, implement adjustment measures and participate in discussions on public policies, which contribute to the low-carbon economy and disseminate initiatives in relation to climate change.

2.6. The Company's employees are aware and trained, and service providers are instructed on social and environmental issues, reinforcing the concepts of citizenship and sustainable development.

3. Influencing the value chain for sustainability

3.1. The Company encourages transparency and dialogue throughout its value chain.

3.2. The value chain is encouraged to promote good social and environmental and governance practices, especially in the relationships established with the Company.

3.3. The protection and promotion of human rights, diversity and fundamental freedoms must be respected and implemented in the value chain.

3.4. The Company evaluates suppliers in relation to social and environmental practices, and expects its suppliers and service providers to have practices and actions that comply with the principles defined in this Policy.

3.5. Logistics transport providers are oriented and encouraged to use solutions for the reduction of greenhouse gases (GHG).

3.6. Partnerships, support and cooperation with government entities, Non-Governmental Organizations ("NGOs") and social stakeholders are carried out for the development and promotion of social and environmental responsibility actions in various segments of civil society.

B - Business - evolve the business model for the generation of value with positive impact

4. To be a reference in the industry for ESG practices

4.1. To insert sustainability into its decision-making processes, the Company adopts a governance model compatible with its activities, in which all topics related to sustainability, diversity and corporate responsibility are previously reviewed by the Executive Board and subsequently submitted to the Sustainability Committee and Board of Directors, as applicable.

4.2. The Company prepares periodic reports on environmental, social and governance performance and should be made to the different governance bodies of the company.

4.3. The Company publishes its Annual Report in addition to posting its information on a portal dedicated to sustainability (<https://cielosustentabilidade.com.br/>).

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4.4. The Company identifies, responds to, monitors and reports environmental, social and climate risks to the Executive Board, the Board of Directors, the Risk Committee, and regulatory bodies, as appropriate.

4.5. The Company identifies and evaluates environmental, social and climate risks related to its employees, suppliers, customers, products, services, systems and processes.

4.6. The Company seeks to protect its reputation in social, environmental and climate aspects, and mitigate the risks linked to the value chain in addition to responding to crises of these natures in a comprehensive manner.

5. Offer sustainable solutions with products and services

5.1. The Company seeks to develop products and services that generate economic value while generating positive social, environmental and climate impact.

5.2. The Company encourages, through the process of technological and social innovation, the search for solutions that address social, environmental and climatic aspects during the cycle of development of its activities, products and services, in order to prevent the occurrence of significant negative impacts resulting from its operations, and foster the occurrence of positive impacts.

6. Act in social inclusion through entrepreneurship

6.1. The Company seeks to foster the business ecosystem of socio-environmental impact, directing efforts and resources to strengthen businesses that accelerate or increase the scale of positive social, environmental and climate impacts.

6.2. The Company seeks to positively impact the segment of entrepreneurs who are in a situation of social vulnerability, especially social groups that are under represented, or considered to be a minority, according to the prioritization set out in the Diversity and Inclusion Policy.

C - Society - to be a means for social transformation

7. Promote humanized business and work relationships

7.1. Ethics in all relationships

7.1.1. Ethics is one of the Company's values and should be a premise for the relationship with all stakeholders.

7.1.2. The precepts of ethical conduct are set forth in Code of Ethics and define the desired behavior of employees and other *stakeholders* that have a relationship with the Company, including suppliers and partners.

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7.2. Combating Corruption

- 7.2.1. The Company does not get involved with any type of business corruption and seeks that same commitment in its value chain.
- 7.2.2. An ethical and transparent posture is maintained and promoted by the Company in all its levels of activities and business relationships, rejecting and combating any form of illegal action, such as corruption or bribery.
- 7.2.3. Disciplinary and/or legal measures are taken if situations of non-compliance with these guidelines are found, both internally and in the supply chain.
- 7.2.4. The relationship of any company representative with public authorities follows the provisions set out in this Policy and other institutional policies related to the subject, such as Anti-Corruption Policy and Stakeholder Relationship Policy, and it is addressed in a specific regulation.

7.3. Respect for Human Rights

- 7.3.1. The Company is committed to promoting and protecting human rights and fundamental freedoms in all its business relationships.
- 7.3.2. The Company's relations with stakeholders are based on its values, acting ethically, transparently and responsibly, promoting the appreciation of diversity, aiming to combat discrimination in any form – gender, color, race, language, ethnicity, disability, sexual orientation, financial situation, religion, national or social origin, marital status, political opinion, age or any other personal characteristic.
- 7.3.3. The Company defends fundamental rights in labor relations and rejects the exploitation of people, children and adolescents, respecting Brazilian legislation and international standards, such as the Universal Declaration of Human Rights and the Guiding Principles on Business and Human Rights.
- 7.3.4. The Company does not agree with the sexual exploitation of minors in its value chain, and does not accept the use of its products/services by customers who may exploit this activity.
- 7.3.5. The Company respects privacy and ensures the freedom of opinion and expression of its employees, customers, suppliers and all other parties involved in its business relations, pursuant to compliance with the provisions established in the Code of Ethics, without any mention or discriminatory act, establishing internal structures and procedures aimed at the protection of these rights.

7.4. Fair competition

- 7.4.1. The Company respects its competitors and believes that fair competition contributes to improving the market. In this sense, the Company has a Competition Policy in force, whose objective is to

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establish guidelines for the prevention of infractions against the economic order, both in the context of contacts between competitors and with regard to the Company's commercial practices.

8. Foster digital inclusion

8.1. The Company seeks to act for social development connected to the development of its business and to promote in its social investment activities, projects and programs that support digital inclusion. The objective of promoting actions that seek the democratization of payment methods in line with the sector's technological advances make the Company's social performance compatible with the direction of its business model.

9. Strengthen social action in education

9.1. Private Social Investment

9.1.1. The Company seeks to contribute to the discussions of agendas for sustainable development and participates in debates for local development.

9.1.2. The Company contributes to the development of society, voluntarily making resources available to projects that promote the transformation of the current circumstances of the audiences served.

9.1.3. The Company prioritizes projects from social organizations that are aligned with the points of action defined in Cielo's corporate responsibility strategy, as well as in initiatives linked to public agendas.

9.1.4. The Company maintains structured channels for receiving projects, adopting clear criteria for its choices, with the objective of democratizing the access of these social organizations to the support given by Cielo, and its projects are monitored during their execution and obtaining results, as well as audited in relation to the proper application of the resources granted.

9.1.5. As parameters of social investment, the Company undertakes to make the best efforts:

- a. in the contribution to participatory development and/or the implementation of public policies and/or collective agendas for sustainable development;
- b. in valuing the actions of local stakeholders;
- c. in the participation in governance bodies of entities to discuss local development;
- d. in the prioritization of structuring and converging social investments with public policies, as well as in the establishment of indicators to monitor the established goals;
- e. in the monitoring, evaluation and reporting of the results obtained.

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9.2. Volunteering

9.2.1. The Company seeks to develop the cultural trait for a social and voluntary performance of its employees and other stakeholders with whom it relates.

9.2.2. The Company supports and encourages volunteering through social actions that seek to increase the Company's positive social impact and encourages the involvement of its employees in activities in the community, as set out in the internal regulations on volunteering.

IV. Consequence Management

Employees, suppliers or other stakeholders who observe any deviations from the guidelines of this Policy may report the fact to the Ethics Channel through the channels below, with the option of anonymity:

- www.canaldeetica.com.br/cielo
- Phone, toll-free: 0800 775 0808

Internally, non-compliance with the guidelines of this Policy gives rise to the application of accountability measures for agents who fail to comply with it, according to the respective severity of the non-compliance, and in accordance with internal regulations.

V. Responsibilities

- **Administrators and Employees:** Observe and ensure compliance with this Policy and, when necessary, call the Sustainability, Diversity and Corporate Responsibility Department for consultation on situations involving conflict with this Policy or upon the occurrence of situations described herein.
- **Sustainability Committee:** Propose and monitor the execution of projects that improve the Company's sustainability practices in the social, environmental and economic dimensions resulting from the Strategic Sustainability Plan, as well as to monitor the social, economic and environmental commitments assumed by the Company.
- **Board of Directors:** Approve this Policy and its revisions and certify the existence of mechanisms to ensure compliance.
- **Sustainability, Diversity and Corporate Responsibility Department:** Responsible for suggesting that this Policy be updated with regard to the internal and external public, seeking alignment with the best practices in the market.

VI. Supplementary Documentation

- [Code of Ethics](#)
- [United Nations Global Compact](#)
- [Anti-Corruption Policy](#)

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- Competition Policy
- Diversity and Inclusion Policy
- Corporate Risk Management and Internal Controls Policy
- Stakeholder Relations Policy

VII. Concepts and Acronyms

- **Social stakeholders:** people, groups of people, or organizations that integrate and/or represent the political and social system of a given region and/or related to a given theme.
- **Local stakeholders:** persons, groups of people, or organizations who are established and/or work in any areas subject to economic, social or environmental impacts (positive or negative) resulting from the organization's operations. Local stakeholders include both people who live near operations as well as in isolated settlements away from operations, but who may suffer their direct impacts.
- **Sustainable Development:** Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.
- **Discrimination:** Any distinction, exclusion or preference based on race, color, sex, age, marital status, appearance, sexual orientation, disability, disease, religion, political opinion, nationality, social origin or other reason which has the effect of nullifying or reducing equality of opportunity or treatment in employment or occupation; prejudice in action.
- **Diversity:** In the Koogan/Houaiss encyclopedia and dictionary (1998), diversity is defined as: "character that distinguishes one being from another".
- **GHG:** Greenhouse gases.
- **Gender:** This refers to the socially constructed roles, behaviors, expressions, and characteristics assigned to people according to their gender (male, female, non-binary people). Gender does not refer to biological sex.
- **Inclusion:** The act of including people belonging to minority or minoritized groups, allowing them full participation in all educational, work, leisure, community and domestic activities.
- **Private Social Investment:** Voluntary transfer of private resources in a planned, monitored, and systematic way to social, environmental, and cultural projects of public interest.
- **NGOs:** non-governmental organizations.
- **Stakeholders:** all relevant target audiences with interests pertinent to the company, as well as individuals or entities that assume some type of risk, direct or indirect, with respect to the company. Among others, the following are highlighted: shareholders,

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investors, employees, society, customers, suppliers, creditors, governments and regulatory bodies, competitors, press, users of means of payment, and non-governmental organizations.

VIII. General Provisions

The Company's Board of Directors is responsible for altering this Policy whenever necessary.

This Policy takes effect on the date of its approval by the Board of Directors and revokes any documents to the contrary.

Barueri, May 25, 2022.

Cielo S.A.

*Exhibit IV belongs to the Abstract of Minutes of the Ordinary Meeting of the Board of Directors of Cielo S.A.
held on May 25, 2022.*

Title:	COMPETITION	Code:	PLT_015
Management Area:	Legal and Government Relations Advisory Office and Executive Vice-Presidency of Risk, Compliance, Prevention and Security	Version:	05

Revision History

Version:	Approval Date:	History:
01	11/05/2015	Preparation of the Document.
02	29/10/2015	Amendment of the title of the policy from "Antitrust" to "Competition Compliance" and of sub-item 1 of the item Guidelines (VI) from "Business Practices" to "Unilateral Practices"; Update of the items Objective (I), Concepts and Acronyms (IV); Responsibilities (V), of the following sub-items of the item Guidelines (VI): 2.1.1, 2.1.4 and 2.2.1 and the item Consequence Management (VII); Inclusion of suppliers in item Scope (II), of the following sub-items of the item Guidelines (IV): 1.2, 1.3, 1.4, 1.5, 1.6, 2.0, 2.1.2, 2.1.3 and 3.0 and their sub-items and the item General Provisions (VIII).
03	18/01/2018	Amendment of the title of the policy from "Competition Compliance" to "Competition"; Inclusion of sub-items 1, 1.1, 4 to 5, 5.2 to 6.1 and 8 to 9.1 of VI. Guidelines; Update items III. Supplementary Documentation, IV. Concepts and Acronyms, V. Responsibilities, VII. Consequence Management and the following sub-items of VI. Guidelines: 2 to 2.3, 3.1.1, 3.1.2, 5.1, 7.1 to 7.3.
04	26/05/2020	Change of items I. Objective; II. Scope, III. Guidelines - sub-items 1.1, 4.1, 5.1, 6.1, 7.1, 7.2 and 7.3; IV. Consequence Management; V. Responsibilities; VII. Concepts and Acronyms; VIII. Supplementary Documentation and IX. General Provisions.
05	25/05/2022	Update of items: I. Purpose, II. Scope, III. Guidelines sub-items 2.2, 5.1, 5.2, 5.3, 5.4, 5.5, 6.1, 7.2, 7.3, 8, 8.1, V. Responsibilities, VI. Supplementary Documentation and VII. Concepts and Acronyms.

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I. Purpose

This Competition Policy ("Policy") aims to guide administrators and employees on the general guidelines for the prevention of infractions against the economic order, both in the context of contacts between competitors, either directly or through trade associations, as well as regarding Cielo S.A.'s business practices. In addition, this Policy establishes general guidelines regarding the identification and notification of economic concentration acts with the Administrative Council for Economic Defense ("CADE"), such as mergers, acquisitions, *joint ventures* and corporate agreements.

For questions about this Policy and its application, all administrators and employees of Cielo S.A. should contact the Legal and Government Relations Advisory Office and the Executive Vice Presidency of Risk, Compliance, Prevention and Security.

II. Scope

All members of the Board of Directors, Advisory Committees and Executive Board ("Officers"), members of the Fiscal Council and employees, regardless of job post or function, of Cielo S.A., Servinet Serviços Ltda., Aliança Pagamentos e Participações Ltda. and Stelo S.A., hereinafter referred to as "Cielo" or "Company".

All the Company's subsidiaries must define their directions based on the guidelines set forth in this Policy, considering the specific needs and the legal and regulatory aspects to which they are subject.

With respect to the Affiliated Companies, the Company's representatives who act in managing its Affiliated Companies must make every effort to define their directions based on the guidelines set forth in this Policy, considering the specific needs and the legal and regulatory aspects to which they are subject.

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III. Guidelines

1. Free Competition

- 1.1. Cielo does not allow the practice of any conduct that results in deviations from Law No. 12.529/2011 ("Competition Law") and prohibits any business practices that result in violation of the economic order.

2. Interactions with Competitors

- 2.1. Cielo's administrators and employees who maintain direct interactions with competitors must strictly observe the guidelines of this Policy and, if necessary, report to the areas responsible for handling this matter.
- 2.2. Sharing any strategic and competitively sensitive information with competitors as defined in Section VIII of this Policy is prohibited, as well as establishing any type of agreement, dealings, modifications or adjustments with competitors on price leveling, sales, standardization of contractual clauses, compensation, market division, discount policy, or any commercial strategies on addressing customers or suppliers.
- 2.3. Cielo's officers and employees shall not adopt or encourage any kind of initiative for coordination with competitors for the purposes of:
 - 2.3.1. Pricing, even if indicatively or suggestively, including when related to the payment of commissions from agents working in other segments of the production chain;
 - 2.3.2. Boycott suppliers or customers; or
 - 2.3.3. Exclusion of a competitor, supplier or customer from the market.

3. Interaction between competitors through Trade Associations or other similar bodies

- 3.1. Officers and employees who participate, representing Cielo, in trade associations or other bodies in which representatives of competing companies also participate, must comply with the following general guidelines and rules:
 - 3.1.1. Recommend to the association or forum that all meetings be preceded by call, with a predefined agenda of the topics to be discussed;
 - 3.1.2. Review whether the agenda contains a matter that may involve competitively sensitive information and, if necessary, recommend the exclusion of the agenda and the recording of the action in the minutes;

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3.1.3. If, during a meeting, a discussion arises on a subject involving strategic and competitively sensitive information, advise the participants that the topic should not be discussed any further and ask that the company's express disagreement with the matter being discussed be included in the minutes. If the discussion continues, the representative should leave the meeting and request that this also be included in the minutes;

3.1.4. Ensure that the full discussion is recorded in the meeting minutes in order to demonstrate their lawfulness, keeping the respective document on file.

4. Relationship with Business Partners

4.1. Commercial and contractual relationships with Cielo's business partners (suppliers, representatives and third parties, among others) must comply with the competition laws. All officers and employees must act in a way that prevents and avoids competition risks, including through business partners, avoiding the practice of conduct that can be interpreted as unilateral abuse of a dominant position.

5. Offers of Product and Service (Commercial or Contractual Relationships)

5.1. In the development and offer of products and services, as well as in other commercial or contractual relationships, Cielo's officers and employees should observe the aspect of defending competition, seeking to prevent competition risks, particularly those arising from the abuse of market power.

5.2. Cielo's possible role as a distributor of products from commercial partners should be isonomic and non-discriminatory.

5.3. It is prohibited to establish any type of agreement, dealings, modifications or adjustments with competitors on the prices of goods or services offered individually or in public bidding, as well as dividing parts or segments of a current or potential market through the distribution of customers, suppliers, regions or periods. The influence for the adoption, as well as the effective adoption, of uniform commercial conduct may also constitute a violation of the Law, including through the intermediation of exchange or transfer of sensitive information between customers or suppliers.

5.4. The validation of offers and incentive programs negotiated through Cielo's Commercial area should consider any exclusionary effects on competitors and potential benefits generated to Cielo's customers, seeking to identify the general effects of the practice on the market, avoiding the production of negative effects on competition.

5.5. The practices of granting discounts that should be carefully assessed include loyalty discount policies, resale pricing, exclusivity agreements, among others.

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6. Market dominant position

- 6.1. In market segments in which Cielo holds (or may hold) a dominant position, its commercial offers and *marketing* and sales programs must be validated by professionals associated to the Legal and Government Relations Advisory Office before they are implemented.

7. Acts of Economic Concentration

- 7.1. CADE shall be notified of any corporate transactions or contractual relationships that alter the structure of the market, including, but not limited to, mergers, asset acquisitions, control acquisitions, takeovers, corporate agreements, consortia or *joint ventures* when the levels of billing objectives set out in the Competition Protection Act are reached, and any updates through interministerial ordinances of the Ministries of Finance and Justice, for the purpose of notification of Acts of Economic Concentration.
- 7.2. In case of the occurrence of corporate transactions or corporate agreements, the officers or employees should consult Cielo's Legal and Government Relations Advisory Office on the need to refer the transaction to CADE. In any case, until the response of the aforementioned area is received, the parties shall not implement/conclude the operation, exchange competitively sensitive information or anticipate payment of the price of the deal, at the risk of being considered an unlawful practice that is potentially sanctionable by CADE, gun jumping.
- 7.3. When the acts of economic concentration are referred to CADE, Cielo's officers and employees must take all necessary measures to prevent the prior conclusion of the transaction from being characterized, prior to the necessary approval of the antitrust body. In this sense, they should always consult the Legal and Government Relations Advisory Office about any practices they wish to implement during the course of the analysis of the act of economic concentration by CADE and that may eventually characterize prior conclusion of the operation.

8. Relations with Controlling Shareholders, Subsidiaries and Affiliates

- 8.1. Cielo does not allow undue and non-justifiable privileges to its controlling shareholders, subsidiaries and affiliates, based on the provisions of the legislation in force.

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9. Training

- 9.1. All officers or employees involved in commercial activities, or who make contact with customers, suppliers, public agents and competitors should be trained periodically and informed as to the proper use of this Policy.

IV. Consequence Management

Officers, employees, suppliers or other stakeholders who observe any deviations from the guidelines in this Policy may report the fact to the Ethics Channel (www.canaldeetica.com.br/cielo or 0800 775 0808), with the option of anonymity.

Violations against the economic order may expose Cielo, its officers and employees to the administrative, civil and/or criminal penalties established in the competent legislation.

Internally, non-compliance with the guidelines of this Policy means the application of accountability measures of agents who do not comply with them according to the respective severity of the non-compliance, allowing the immediate suspension of work-related functions, review of business relations, opening of a criminal case and eventual dismissal, among other actions.

V. Responsibilities

▪ Administrators and Employees:

- Observe and ensure compliance with this Policy and, when necessary, contact the Legal and Government Relations Advisory Office and the Executive Vice Presidency of Risk, Compliance, Prevention and Security for consultation on situations that may involve conflict with these guidelines or the occurrence of risk situations described therein.

▪ Third Parties and Suppliers:

- Observe and ensure compliance with this Policy as well as the provisions of Cielo's Code of Ethics and, when necessary, use the available channels at Cielo for consultation on situations involving conflict with these guidelines, or upon the occurrence of situations described herein.

▪ Legal and Government Relations Advisory Office:

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- Keep this Policy up-to-date to ensure that any regulatory/legal changes to the general guidelines and rules set forth herein are properly observed;
 - Inform officers and employees of unilateral or coordinated practices that may be considered abusive under the Competition Law;
 - Assess, from the perspective of the Competition Law, the structure of new products and services offered by Cielo;
 - Promote recurrent training for dissemination of the Policy to all employees; and
 - Answer questions regarding this Policy and its implementation, as well as the relevant legislation.
- **Executive Vice-Presidency of Risk, Compliance, Prevention and Security:**
 - Periodically evaluate the mechanisms implemented by Cielo to hinder the performance of practices and conducts that harm competition; and
 - Adopt mechanisms for monitoring compliance with the guidelines of this Policy, as well as for reporting the work carried out.

VI. Supplementary Documentation

- Cielo's Code of Ethics;
- Law No. 12.529/2011 (Competition Law) and applicable related regulations;
- Internal standards that are constantly improved, approved by the competent approval authority, and provided to all employees.
- Anti-Corruption Policy.

VII. Concepts and Acronyms

- **Economic Activity for the purpose of Corporate Agreements:** Economic activity is considered the acquisition or offer of goods or services in the market, even if without profit, provided that, in this case, the activity can, at least in theory, be exploited by a private company for the purpose of obtaining profit.
- **Economic Concentration Act:** Merger, acquisition of assets, acquisition of control, incorporation, associative agreement, consortium or *joint venture* involving two or more companies, in which the economic groups involved have registered, in the year prior to the transaction in question, the revenue targets set out in the legislation in force (i.e.,

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for the economic group of one of the parties, gross revenue or turnover of at least BRL 75 million in the year prior to the operation and, in the case of the economic group of another party, gross revenue or minimum volume of at least BRL 750 million, according to the terms of Interministerial Ordinance No. 994 of May 30, 2012).

- **CADE:** Administrative Council for Economic Defense.
- **Sharing risks and results for the purpose of Corporate Agreements:** Risk sharing is considered, among others, situations in which the parties share the costs or risks of the activity object of the contract. In turn, the sharing of results should be understood as, among other notions, the distribution or division of gains (including financial) arising from the economic activities set out in the contract. Contracting parties are those directly involved in the notified operation and their respective economic groups.
- **Competition:** Dispute between suppliers in a given market over the preference of consumers or final recipients of their goods or services.
- **Conducts with exclusionary effects:** Business conduct that may exclude competitors from a given market.
- **Gun Jumping:** Putting into practice acts or activities whose implementation depends on the prior approval of an Economic Concentration Act by CADE.
- **Corporate Agreements:** Contracts that cumulatively meet the following requirements: (i) have a term of 2 (two) years or more; (ii) establish a joint venture for the exploitation of economic activity (see definition below); (iii) establish the sharing of risks and results of the economic activity that constitutes its object (see definition above); and (iv) the contracting parties are competitors on the relevant market object of the contract.
- **Prior control of Economic Concentration Acts:** Prior submission of the Economic Concentration Act to CADE for analysis and approval, pursuant to Law No. 12.529/2011.
- **Joint Venture for the purpose of Corporate Agreements:** It is considered a joint venture, among others, an undertaking that denotes some degree of synergy and coordination of activities between the parties, involving, for example, joint decisions regarding compensation, investment and pricing of products and services, exclusivity, joint service to customers or suppliers, joint development of *marketing* campaigns, among other elements arising from the contractual relationship established by the parties.

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- **Antitrust offenses or competition violation:** Practices committed by companies and their representatives, unilaterally or jointly with competitors, which have as object or may produce harmful effects to competition, pursuant to Law No. 12,529/2011.
- **Strategic or competitively sensitive information:** Relate, among others, to information that directly concerns the companies' business strategies and that may change competitive dynamics, such as the price of the product/service, pricing criteria, discounts, operating costs, production capacity, production costs, *marketing*, customer identification, employee salaries, supplier identification and the terms and conditions of contracts concluded with them, non-public information on intellectual property, plans for future acquisition or investments, among other aspects of the company's competitive positioning.
- **Competition Law:** Law No. 12,529/2011 that establishes the Brazilian System for the Defense of Competition and regulates the prevention and repression of infractions against the economic order.
- **Dominant position:** Position that potentially allows an economic agent to unilaterally affect the conditions of competition in a certain market. Generally, the holding of significant market share is an important but not sufficient indication of the holding of a dominant position. The Competition Law establishes a relative presumption (that is, that can be challenged in this case) that holding a market share of 20% (twenty percent) or more constitutes a dominant position.
- **Coordinated practices:** Practices carried out by a set of economic agents, which can be considered illegal competition, pursuant to Law No. 12.529/2011. The most common coordinated anticompetitive practice is a cartel.
- **Unilateral practices:** Practices carried out by a company that, by itself, is capable of affecting competition for goods or services. In order to characterize a unilateral competitive infringement, it is necessary for the economic agent to have a dominant position in the market in which it operates and abuses that dominant position. Unilateral anticompetitive practices can produce exclusionary effects in the dominant company's market. Some examples of practices that may be considered abusive depending on the circumstances: predatory prices, resale pricing, conditional discounts, refusal to hire, exclusivity agreements, among others. As a rule, unilateral practices depend on an

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analysis of the anticompetitive, potential or actual effects on other economic agents and the competitive environment as a whole.

- **Affiliates:** Companies in which the Company has significant influence, whereby, pursuant to article 243, paragraph 4 and paragraph 5 of the Corporation Law, (i) there is significant influence when the Company holds or exercises the power to participate in the financial or operating policy decisions of a company, but without controlling it; and (ii) significant influence will be presumed when the Company holds 20% (twenty percent) or more of the voting capital of the corresponding company, but without controlling it.
- **Subsidiaries:** Companies in which the Company, directly or indirectly, holds partner or shareholder rights that assure it, on a permanent basis, preponderance in the corporate decisions and the power to elect the majority of the managers, under the terms of article 243, paragraph 2 of the Brazilian Corporation Law.

VIII. General Provisions

The Company's Board of Directors is responsible for altering this Policy whenever necessary.

This Policy takes effect on the date of its approval by the Board of Directors and revokes any documents to the contrary.

Barueri, May 25, 2022.

Cielo S.A.

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*Exhibit V belongs to the Abstract of Minutes of the Ordinary Meeting of the Board of Directors of Cielo S.A.
held on May 25, 2022.*



INTERNAL REGULATIONS OF THE SUSTAINABILITY COMMITTEE ADVISORY BODY TO THE BOARD OF DIRECTORS

The Board of Directors of Cielo S.A. ("Company"), in a meeting held on May 25, 2022, approved the Sustainability Committee Internal Regulations ("Regulations"), as follows:

1. Purpose and mission

1.1. Purpose. These Regulations govern the composition, operation, and duties of the Sustainability Committee ("Committee"), a body linked and advisory to the Company's Board of Directors ("Board of Directors"), with due regard for the provisions of the Company's bylaws ("Bylaws") and applicable legislation.

1.2. Mission. The Committee's mission is to advise the Board of Directors in the performance of its duties related to sustainability, among which the establishment of guidelines and corporate actions as well as the reconciliation of economic development issues with those of social responsibility, ensuring the long-term success of the business while contributing to a healthy environment, a fair society, and Brazil's economic and social development.

2. General Rules of the Committee

2.1. Installation. The Committee is installed by the Board of Directors, in accordance with Article 27 of the Bylaws of these Regulations.

2.2. Duty. The Committee is responsible for:

- (a) proposing and monitoring the execution of projects that improve the Company's sustainability practices in the social, environmental, and economic dimensions, arising from the Strategic Sustainability Plan;
- (b) proposing the inclusion of the Company in national and international rankings and indexes referenced to corporate sustainability;
- (c) monitoring the social, economic, and environmental commitments undertaken by the Company;
- (d) participating in the preparation of reports that demonstrate the Company's social and environmental performance;
- (e) monitoring the Company's social, environmental, and economic indicators;
- (f) assess the results of social and cultural projects sponsored by the Company;
- (g) following the trends of the topics related to the sustainability of the business;
- (h) regularly reporting to the Board of Directors on the Company's social and environmental performance and
- (i) analyzing and issuing recommendations on other matters requested by the Board of Directors.

2.3. Composition. The Committee shall be composed of at least three (03) members, elected by the Board of Directors, pursuant to the provisions of Article 2.3.1.

2.3.1. Mandatorily, the Committee shall be composed of at least 4 (four) members, being **(a)** preferably composed of members of the Board of Directors; **(b)** two of its members, at least, independent board members of the Company (as per the definition of "Independent Board Member" provided in the Novo Mercado Listing Rules of B3 S.A. - Brasil, Bolsa, Balcão); and **(c)** the statutory officer responsible for the Company's sustainability area.

2.3.2. The members of the Committee shall be elected during the first Board of Directors meeting held after the Company's Annual Shareholder's Meeting.

2.3.3 The Committee shall also have the ad hoc participation of Company executives, who have a direct relationship with the sustainability projects and practices.

2.3.4 Members of the Fiscal Council, when installed, are not allowed to participate.

2.4. **Term of Office.** Committee members' terms of office of the Committee are unified for two (2) years, coinciding with the term of office of the members of the Board of Directors, reelection permitted.

2.5. **Investiture.** The Committee members will take office by signing an instrument of investiture within 30 (thirty) days of their appointment, which will be duly filed at the Company's headquarters.

2.6. **Compensation.** The Committee members may or may not be compensated, at the discretion of the Board of Directors.

2.7. **Election of the Coordinator.** At the first meeting immediately following the election of the Committee members, the Coordinator shall be elected, whose term of office shall coincide with the unified term of office of the Committee members. The Coordinator of this Committee must be a member of the Company's Board of Directors.

2.7.1 The Coordinator's main duties, with the assistance of the Secretariat of the Board of Directors ("**Corporate Governance Secretariat**"), will be to (a) call and chair the meetings of the Committee; (b) coordinate and set the agenda for the meetings; (c) ensure that the members of the Committees receive complete and timely information on the items on the agenda for the meetings; (d) ensure the effectiveness and good performance of the Committee; (e) comply with and enforce these Regulations; (f) occasionally propose the invitation of experts to participate in the meetings; (g) represent the Committee in its relationship with the Board of Directors and the Company's Executive Board ("**Executive Board**"); (h) report the issues discussed at the Committee's meetings to the Board of Directors on a periodic basis.

2.8. **Absence of the Coordinator.** In the event of absence or temporary impediment of the Committee Coordinator, the Coordinator's duties shall be performed by another member appointed by a majority decision of the Committee members present at the meeting.

2.9. **Vacancy.** In the event of a definitive vacancy in the Committee, the Board of Directors shall be summoned to elect a substitute, who shall remain in office until the end of the term of the replaced member, in order to comply with the unified term of office of the Committee members.

2.10. **Waiver.** Resignation from the position of Committee member shall occur through written communication to the Board of Directors, becoming effective before the Company upon receipt by the Board of Directors.

3. Duties and responsibilities

3.1. Member Duties and Responsibilities. The members of the Committee shall: (a) perform their duties respecting the same duties and responsibilities attributed to the Company's management, contained in Articles 153 to 159 of Law no. 6.404/76 ("LSA"), according to the provision contained in Article 160 of the LSA; not disclose to third parties any Company documents or information to which they have access, and shall maintain secrecy and confidentiality, using them only for the exercise of their duties as members of this Committee, as

well as demanding the same confidential treatment from the professionals that act in an advisory role, under penalty of being held liable for the act that contributes to their undue disclosure; (c) abstain from intervening, individually or jointly with a third party, in any transactions between the Company and its Related Parties (as defined in the Policy on Transactions with Related Parties and Other Situations Involving Conflicts of Interest); (d) act with the utmost independence and objectivity, aiming at the Company's best interest so that the Committee may achieve its purpose, and must also observe and respect the Company's codes and policies, to which they are subject.

4. Operation of Meetings

4.1. Periodicity. The Committee shall ordinarily meet on a quarterly basis, and extraordinarily whenever necessary, according to the convening rules indicated in these Regulations.

4.2. Call to Order. Calls for Committee meetings shall be made by the Corporate Governance Secretariat, with the guidance from the Coordinator or, in the event of the Coordinator's absence or temporary impediment, with guidance from the person responsible for calling the Committee's meetings, subject to the terms of these Regulations, through the Company's Corporate Governance Portal or alternatively by electronic mail (email), and must contain the date, time and place of the meeting, the items on the order of business, accompanied by the respective supporting materials.

4.2.1. Notwithstanding the call formalities set forth in these Regulations, meetings will be considered regular if **(a)** all members of the Committee attend, or **(b)** they are convened at shorter notice than provided above due to urgency.

4.3. Call deadline, agenda, and material. The call notice, agenda, and supporting material for the meetings must be sent at least five (5) days prior to the date set for the meeting.

4.3.1. If the Committee members do not receive the documents referred to in the heading of this Article in a timely manner, any member may request that the item referring to the material not forwarded in due time be removed from the agenda and included in the next meeting. Whether or not such an item is kept on the order of business shall depend on the approval by a majority decision of the members present at the meeting, provided that the delay does not make the analysis of the matter unfeasible.

4.3.2. In the event of an extraordinary meeting, called due to the need for urgent manifestation of the Committee, it shall be up to the Coordinator, or in the event of the Coordinator's absence or temporary impediment, to the person responsible for calling the Committee meeting, observing the terms of these Regulations, to define the minimum term for forwarding the agenda and pertinent material with the assistance of the Corporate Governance Secretariat.

4.4. Location. Committee meetings shall preferably be held at the Company's headquarters.

4.5. Installation quorum. The Committee meetings shall only be held, on first call, with the presence of the majority of the acting members. In the absence of the minimum quorum, a new meeting shall be called according to the urgency required for the matter to be addressed, which shall be held with any quorum.

4.6. Composition of the bureau. The Committee meetings shall be chaired by the Coordinator, or, in his/her absence or temporary impediment, as established in item 2.8 of these Regulations.

4.7. Manifestation of Vote. Each member is entitled to 1 (one) vote at Committee meetings.

4.8. Deliberation Quorum. As a general rule, the Committee's deliberations will be made upon approval by the majority of the members present at the meeting, excluding the votes of any members with interests conflicting with those of the Company.

4.8.1. Anyone who is not independent of the matter under discussion must state, in a timely manner, his or her conflict of interest or private interest, and another person may make such a statement if he or she fails to do so. In this case, such a member shall be prevented from voting and participating in the discussions, and must leave the room while the topic is being discussed.

4.9. Matters outside the agenda. The inclusion of matters outside the order of business will depend on the unanimous approval of the Committee members present at the meeting.

4.10. Guests. The Coordinator, of his/her own initiative or at the request of any member, may invite, at his/her discretion, members of the Company's Board of Directors, officers, employees, independent auditors, and/or third parties to attend Committee meetings and provide the necessary clarifications regarding a certain item on the order of business for the respective meeting.

4.11. Remote meetings and participation. This Committee is allowed to hold its meetings remotely, as well as to allow the remote participation of its members.

4.11.1 Meetings can be held by conference call, videoconference, or by any other means of communication that allows the identification of the participating Committee members and communication with others in attendance.

4.11.2. In the event of a remote meeting and/or remote participation, Committee members must undertake to prevent third parties from attending the meeting without prior approval from the Coordinator.

4.11.3. The respective minutes must be subsequently signed by all members participating in the meeting, in the shortest time possible.

4.12. Drafting of the Minutes. Minutes of the Committee meetings will be drafted, to be signed by all and recorded in the respective ledger, filed at the Company's headquarters.

4.12.1. The draft minutes will be prepared by the Corporate Governance Secretariat and sent to the Committee members within 5 business days from the date the meeting was held.

4.12.2. Committee members must forward any requests for corrections and/or improvements to the draft minutes to the Corporate Governance Secretariat within 3 business days of their receipt. Any requests received by the Corporate Governance Secretariat will be discussed and approved at the subsequent meeting.

4.13. Corporate Governance Secretariat. The Committee's bureau shall include a Secretary, who is responsible for:

- (a) organizing, under the Coordinator's guidance, the agenda for the matters to be addressed, based on requests from the Board of Directors, members of the Committee, and demands by the Company's Executive Board;
- (b) producing the call notices for Committee meetings, making Committee members – and any attendees – aware of the location, date, time, and order of business;

- (c) acting as secretary for the meetings, recording the time spent on the deliberations, producing and drafting the respective minutes and other documents in the proper ledger, collecting the signatures of the members who attended the meetings, and recording the attendance of any guests;
- (d) filing at the Company the minutes and deliberations made by the Committee, as well as forwarding to the competent bodies for registration and publication, if applicable;
- (e) issue certificates, abstracts, and attest, before any third party, for due purposes, the authenticity of the deliberations made by the Committee;
- (f) assessing whether the Committee's deliberations do not conflict with legal or statutory provisions or with previous deliberations.

5. Annual Report

5.1. Periodicity and submission. Annually, on the occasion of the preparation of the Management Report, the Committee shall prepare and submit a written report to the Board of Directors, summarizing its activities during the past year, as well as any outstanding recommendations it may have decided upon.

6. General Provisions

6.1. Amendment to the Regulations. The Committee may review and evaluate, as appropriate, the adequacy of these Regulations and propose to the Board of Directors the amendments identified as necessary or convenient. However, these regulations may only be amended by a majority decision of the members of the Board of Directors.

6.2 Omission situations. Omissions related to these Regulations, doubts over interpretation and/or amendments to its terms shall be submitted to the Board of Directors for deliberation.

6.3. Cases of conflict and inconsistency. In case of conflict or inconsistency between the provisions of these Regulations, the Bylaws or the Shareholders' Agreement filed at the Company's headquarters, the provisions of the documents shall prevail in the following order:

- (a) Shareholders' Agreement;
- (b) Bylaws;
- (c) these Regulations.

6.4. Validity. These Regulations take effect on the date of approval by the Board of Directors.

6.5. Scope. These Regulations shall be observed by the Company, its Officers, the members of its Board of Directors, the members of this Committee, the members of the other advisory committees, as well as by the other areas of the Company.

May 25, 2022