

VP/BoardVP of Technology & BusinessVersion07

Revision History

Version	Approval Date:	History:	
:	03/06/2013	Preparation of the Document.	
01 02	29/04/2014	Inclusion of item 6 and adaptation in item 8.	
03	08/06/2015	Inclusion of the items Scope (II), Supplementary Documentation (III), Concepts and Acronyms (IV), Responsibilities (V) and Consequence	
		Management (VII). Adaptation of Purpose (I) regarding the concept of sustainability. Update of the text of item Guidelines (VI) with the inclusion of items 2.4, 10, 11 and 12 and adjustments to items 1, 6, 7 and 9.	
04	01/08/2017	Update of items I. Purpose, III. Supplementary Documentation, and of sub-item 2.2 of VI. Guidelines.	
05	29/10/2019	Update of items II. Scope, III. Guidelines sub-items 1, 2.2, 2.4, 3, 5, 6, 7, 9, 10 and 12, VII. Concepts and Acronyms and VIII. General Provisions.	
06	17/12/2021	Update of items: I. Purpose, II. Scope, IV. Consequence Management, V. Responsibilities, VI.Complementary Documentation and VII. Concepts and Acronyms, in addition to sub-items 2.4, 2.5, 2.6, 6 ar 8 of item III. Guidelines.	
07	29/11/2023	Update of items: I. Purpose, II. Scope, III. Guidelines sub-items 3, 4, 6, IV. Consequence Management, V. Responsibilities, VI. Concepts and Acronyms.	

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I. Purpose

The purpose of this Products and Services Policy ("Policy") is to establish the guidelines to offer products and services that promote the sustainable growth of Cielo S.A.- Instituição de Pagamento ("Cielo"), its subsidiaries and affiliate companies, partners and Clients, promoting positive impacts for society, as well as for present and future generations.

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II. Scope

All members of the Board of Directors, the Executive Board ("Directors"); members of the Advisory Committees and the Fiscal Council; Employees, including outsourced workers, interns and young apprentices ("Employees") of the companies Cielo, Servinet Serviços Ltda. ("Servinet"), Stelo S.A. ("Stelo") and Aliança Pagamentos e Participações Ltda. ("Aliança"), hereinafter jointly referred to as the "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

- 1. The Company's main focus is to meet the needs of its clients with quality, reliability, availability, and efficiency, as well as to promote the sustainable growth of the business, positively impacting society.
- 2. The development of products and services and the approval of business models respect internal evaluation methodologies, which mainly consider:
 - 2.1. The optimization of the Company's resources, whether financial, procedural and/or organizational, in order to ensure the greatest performance efficiency.
 - 2.2. The guarantee of a win-win relationship between all market agents (card issuers, card brands, shareholders, and partner companies) and, mainly, the Client, be it a large institution, a micro-entrepreneur, or an independent or self-employed professional.
 - 2.3. Macroeconomic, social and environmental impacts.
 - 2.4. Compliance with the legislation and regulation applicable to products and services and acting in conformity with legal and regulatory aspects.
 - 2.5. Evaluation and mitigation of any risks involved, identified by means of the issuance of technical opinions by the areas that provide advice and/or are impacted, formalized and submitted to the Products and Services Forum.
 - 2.6. The Company's strategic guidelines and cultural attributes, established in the Code of Ethics.
- 3. For the development of products and services, the Company's role as a partner in its Clients' business is taken into consideration, seeking to increase sales, facilitate receivables, and improve the understanding of the portfolio. The product and service development process is carried out gradually and progressively, going through predefined stages and intermediate validations in different key areas

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of the Company, ensuring that we meet the needs of the market and offer a better experience to our customers

- 4. To develop products and services, the company considers ease, simplicity and full usability by its customers in all its existing channels, as well as promoting the creation of new capture solutions aimed at its capillarity and comprehensive presence in the means of payment market.
- 5. For the planning and analysis of the impacts of new services and/or products, or to carry out significant modifications in existing products and services, the following issues, among others, are evaluated: optimization of the Company's resources, assurance of a win-win relationship among all market agents (issuers, brands, shareholders, and partner companies), mainly the Client, applicable legal and regulatory aspects and the risks involved, which must be duly approved, according to the Company's applicable governance.
- 6. The Company plans, develops, innovates, and repositions its products, services and business models, considering the short, medium, and long-term social, environmental, and macroeconomic impacts. In this sense, it seeks to optimize the use of natural resources, reduce pollutant emission, and adapt to climate change. Aspects of social inclusion are considered, beyond the minimum required by law, encouraging the financial inclusion of less favored classes and client segments with strong social impact, such as Non-Governmental Organizations ("NGOs"). With the development of products and services and the creation of payment solutions, the Company contributes to the strengthening of the Brazilian economy, meeting governmental initiatives, promoting the growth and development of society.
- 7. Innovation, associated with the development of new products and services, seeks to maintain the Company as a reference in network and payment services, as well as creating value and differentiation in deliveries using agile methodology as support. This model consists of a set of best practices that provide the management and execution of initiatives in an adaptive way to the business context and needs, which change according to the market. The deliveries are structured in short cycles, allowing the constant activation of value for the client.
- 8. All employees, other stakeholders, and the Company's business units have an open channel to propose ideas and suggest improvements in processes and products, stimulating the innovation process. To this end, different communication channels are provided for forwarding suggestions, complaints and opinions.
- 9. The Company discloses to Clients clear information about its products and the use of its services, through multiple communication channels.
- 10. The perceptions, opinions, and satisfaction of clients are systematically monitored in order to understand their needs and guide the development of products and services in such a way as to meet such needs.
- 11. Products and services are analyzed throughout their life cycle for sustainable performance. The environmental and social externalities of



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products and services are evaluated, with a focus on minimizing social and environmental impacts and identifying alternatives that are synergistic with sustainability.

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
- Toll-free number: 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

- Administrators and Employees: Comply with and enforce this Policy and, when
 necessary, call the Executive Vice President of Technology and Business for consultation
 on situations involving conflict with this Policy, as well as upon the occurrence of
 situations described herein.
- Executive Vice Presidency of Technology and Business: Comply with and enforce the guidelines set forth in this Policy, keep it updated to ensure that any changes to its guidance are incorporated hereto, and clarify doubts regarding its content and application.
- Products and Services Forum: advise the Executive Board with a focus on the quality and efficiency of the activities performed by the Company related to the development and monitoring of its products and services, ensuring its strategic objectives and values in coherence with the basic principles of corporate governance. In addition, the Products and Services Forum will be responsible for recommending to the Executive Board, as well as monitoring, the best practices adopted or to be adopted by the Company with regard to the operational model adopted for its products and services.

VI. Supplementary Documentation

- Company Code of Ethics;
- Laws and regulations in effect;
- Internal Regulations of the Products and Services Forum; 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

- **Executive Board**: the body responsible for managing the company's business, executing the strategy and general guidelines approved by the Board of Directors. Through formalized processes and policies, the Executive Board enables and disseminates the organization's purposes, principles, and values.
- **Affiliates:** Companies in which the investor has significant influence, under the terms of article 243, paragraph 1 of the Corporations 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: Investors, employees, society, clients, suppliers, partners, creditors, governments and regulatory bodies, competitors, press, associations and class entities, users of electronic 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, November 29, 2023.

Cielo S.A. – Instituição de Pagamento