

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.