

Title:	SUSTAINABILITY	Code:	PLT_013
VPE:	People, Management and Performance	Version:	05

Revision History

Version:	Revision Date:	History:
01	June 3, 2013	Document preparation.
02	June 26, 2015	Unification with the Corporate Responsibility Policy. Adequacy of the Purpose (I) and Guidelines (VI). Inclusion of the following items: Scope (II), Additional Documentation (III), Concepts and Acronyms (IV), Responsibilities (V), Consequence Management (VII) and Miscellaneous (VIII).
03	May 6, 2016	Change of the VPE responsible for the Institutional Relations Policy for Organizational Development; Update of the following items: Additional Documentation (III) and the following items of the Guidelines (VI): 3.1, 3.2, 8.3 and 8.5; Inclusion of items 3.3, 3.5, 4.3 and 9.2 of the Guidelines (VI).
04	June 7, 2018	Update of the following items: Purpose (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 Additional Documentation (VI).
05	May 22, 2020	Amendment to the following items: I. Purpose; 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. Additional Documentation; VII. Concepts and Acronyms.

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I. Purpose

Reaffirm the commitment of Cielo, a service and technology company, to sustainable development, thus establishing the guidelines for inclusion of social, environmental and governance aspects to its businesses.

II. Scope

All management members (executive officers, members of the Board of Directors and members of the Advisory Committees), Fiscal Council members and employees of Cielo S.A., Servinet Serviços Ltda., Aliança Pagamentos e Participações Ltda. and Stelo S.A., are hereinafter referred to as “Cielo” or “Company”.

All Company subsidiaries must define their guidance based on the guidelines provided for in this Policy, considering the specific needs and legal and regulatory aspects to which they are subject.

Regarding its Affiliates, the Company’s representatives acting as management members of the Affiliates must spare no efforts for said companies to define their guidance based on the guidelines provided for in this Policy, considering the specific needs and legal and regulatory aspects to which they are subject.

III. Guidelines

1. Ethics in all Relationships

- 1.1. Ethics is a Company value and must be a premise for the relationship with all stakeholders.
- 1.2. The principles of ethical conduct are established on the [Code of Ethical Conduct](#) and define the conduct expected from employees.

2. Fight against Corruption

- 2.1. The Company does not agree with any type of corruption in business and seeks this commitment in its value chain.
- 2.2. The Company maintains and promotes transparent and ethical behavior in all levels of activities and business relationships, and repudiates and fights against any type of illegality, such as corruption or bribery.
- 2.3. The employee, supplier or customer must contribute to a corruption-free environment. Any indications of corruption must be anonymously sent to the [Ethics Channel](#).
- 2.4. The Company will take disciplinary and/or legal measures in events of noncompliance with these guidelines, both internally and in the supply chain.
- 2.5. The relationship of any Company representative with the government is governed by this Policy and addressed to in a specific rule.

3. Social Responsibility and Respect to Human Rights

- 3.1. The Company undertakes to promote and protect human rights and freedom in all its business relationships.
- 3.2. The Company’s relationships with stakeholders are based on its values and, therefore it acts in an ethical, transparent and responsible manner, valuing diversity and aiming to fight any type of discrimination – gender, color, race, language, ethnicity, disability, sexual orientation, financial condition, religion, national or social origin, marital status, political opinion, age or any other personal characteristic.

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- 3.3. The Company defends fundamental rights in labor relations and repudiates the exploitation of people, especially children and adolescents, thus respecting the Brazilian law and international regulations, such as the Universal Declaration of Human Rights and the Guiding Principles on Business and Human Rights.
- 3.4. The Company does not agree with the sexual exploitation of children in its value chain, nor does it accept the use of its products/services by customers that may exploit this activity.
- 3.5. The Company respects privacy and ensures the freedom of opinion of its employees, customers, suppliers and everyone involved in its business relationships, establishing internal structures and procedures to protect these rights.
- 4. Responsibility in the Value Chain**
 - 4.1. Cielo encourages transparency and dialogue throughout its value chain.
 - 4.2. The value chain is encouraged to follow good social, environmental and governance practices, especially in the relations established with the Company.
 - 4.3. The protection and promotion of human rights and fundamental freedoms must be respected and implemented in the value chain.
 - 4.4. The Company will prioritize suppliers engaged with and practicing social and environmental responsibility, and who are in compliance with the principles defined in this Policy.
 - 4.5. Logistics transport suppliers are instructed and encouraged to use solutions to reduce greenhouse gases (GHG).
 - 4.6. Partnerships, support and cooperation with government entities, NGOs and social players are carried out for the development and promotion of social and environmental responsibility initiatives in several segments of civil society.
- 5. Fair Competition**
 - 5.1. The Company respects competitors and believes that fair competition contributes to the improvement of the market. Accordingly, Cielo has a Competition Policy in force that aims at establishing guidelines for the prevention of violations against the economic order, both related to contacts between competitors and Cielo's commercial practices.
- 6. Social Investments**
 - 6.1. The Company seeks to contribute to discussions on agendas for sustainable development and participates in debates for local development.
 - 6.2. The Company contributes to the development of society, voluntarily making available resources to projects and/or resources that lead to the transformation of the reality of those assisted.
 - 6.3. Projects arising from social organizations that are aligned with the Company's focus are prioritized, as well as initiatives related to public agendas.
 - 6.4. In order to democratize the access of such social organizations to the Company's support, Cielo has structured channels to receive projects, and adopts clear criteria for choosing them, monitoring their execution and obtaining results, and audits the appropriate use of the resources granted.
 - 6.5. As parameters for social investment, the Company is committed to making the best efforts in **(a)** contributing to participatory construction and/or to the implementation of public policies and/or to collective sustainability development agendas; **(b)** valuing the role of local players; **(c)** participating in corporate governance bodies to discuss local development; **(d)** prioritizing structural social investments that meet public policies, and establishing indicators to monitor the goals set; **(e)** monitoring, evaluating and informing the results obtained.

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7. Volunteer Work

- 7.1. Cielo encourages volunteer work through initiatives that support the participation of its employees in activities carried out in the community it operates, as provided for in its internal regulation.

8. Efficient Management of Natural Resources and Reduction of Environmental Impacts

- 8.1. The development and performance of the Company's economic activities are in compliance with legal requirements and other requirements applicable to environmental matters, as per applicable legislation.
- 8.2. The Company seeks to implement the best environmental management practices using a preventive approach to mitigate potential environmental impacts arising from its operations, products and services, in order to continuously improve its processes.
- 8.3. The Company uses natural resources in a responsible and sustainable manner and adopts internal measures to rationalize the use of non-renewable resources, prioritizing and encouraging water and energy efficiency, reusing materials, and properly treating waste and disposable materials.
- 8.4. The Company encourages the preservation of the environment by means of technological innovation and seeks to conserve biodiversity, ensuring that social and environmental aspects are identified and monitored during the development cycle of activities, products and services in order to avoid significant impacts caused by its operations, by using ecosystem services in a sustainable manner.
- 8.5. The Company contributes to the fight against climate changes through a strategy that measures impacts, reduces emissions, sets goals, offsets inevitable emissions, implements measures to adapt and participates in discussions about public policies that contribute to low-carbon economy and the disclosure of initiatives related to climate changes.
- 8.6. The Company's employees are educated and taught and service providers are instructed about social and environmental matters, reinforcing the concepts of citizenship and sustainable development.

9. Social and Environmental Risks

- 9.1 The Company has a method that provides information to identify, analyze, answer, monitor and report social and environmental risks to the Executive Board, Board of Directors, Risks Committee and regulatory authorities, as applicable.
- 9.2 The Company identifies and assesses social and environmental risks with employees, suppliers, customers, products, services, systems and processes.

10. Sustainability Governance

- 10.1. In order to include sustainability in its decision-making processes, the Company adopts a governance model compatible with its activities, where all matters related to sustainability are previously analyzed by the Executive Board and then sent to the Sustainability Committee and Board of Directors, as applicable.
- 10.2. Periodic reports on social and environmental performance must be prepared to the different governance authorities of the Company.

11. Disclosure

- 11.1. Information related to any occurrences and to social and environmental initiatives carried out by the Company are mainly disclosed through the Sustainability Report (annual) and made available to anyone who may be interested.

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IV. Consequence Management

Employees, suppliers or other stakeholders who become aware of any non-compliance with the guidelines of this Policy may report it to the Ethics Channel (www.canaldeetica.com.br/cielo or 0800 775 0808), either anonymously or not.

Internally, those who do not comply with the guidelines of this Policy will be subject to accountability measures based on the seriousness of such non-compliance.

V. Responsibilities

- **Management and Employees:** Comply and ensure compliance with this Policy and, when necessary, contact the Sustainability and Corporate Responsibility Management to get information on situations that relate to conflict with this Policy or with situations described herein.
- **People, Management and Performance VPE and Sustainability Management (Executive Management, Compensation and Sustainability Superintendence):** Responsible for proposing the update of this Policy regarding internal and external public, seeking the alignment with the best market practices.

VI. Additional Documentation

- United Nations Global Compact (www.unglobalcompact.org/)
- Universal Declaration of Human Rights
- Guiding Principles on Business and Human Rights
- International Charter on Human Rights
- Global Reporting Initiative
- Brazilian GHG Protocol Program
- [Code of Ethical Conduct](#)
- [Anti-Corruption Policy](#)
- Corporate Risk Management and Internal Control Policy
- Other policies and internal regulations constantly improved, approved by the competent levels and made available to all employees.

VII. Concepts and Acronyms

- **Social players:** any person, group of people or organizations that are part of and/or represent the political and social system of a specific religion and/or related to a certain theme.
- **Local players:** people, group of people or organizations established at and/or working in any areas subject to the economic, social or environmental impacts (positive or negative) arising from the organization's operations. Local players include both people living close to operations and settlements away from the operations, but that may be directly impacted by them.
- **Sustainable Development:** development that meets the needs of the present without compromising the ability of future generations to meet their own needs.
- **GHG:** greenhouse gases.
- **Private Social Development:** voluntary transfer of private resources in a planned, monitored and systematic way to social, environmental and cultural projects of public interest.
- **NGOs:** non-profit organizations.
- **Stakeholders:** all relevant public with interests relevant to the company or persons or entities that take some type of risk, direct or indirect, before the society, such as shareholders, investors, employees, society, customers, suppliers, creditors, government and regulatory bodies, competitors, press, users of payment methods and non-profit organizations.

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VIII. Miscellaneous

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

This Policy will become effective as of its date of approval by the Board of Directors and revokes any documents, unless otherwise stated.

Barueri, June 24, 2020.

Cielo S.A.