

Title	FINANCE	Code	PLT_004
VP/Board	VP Finance and IR	Version	06

Revision History

Version	Approval Date:	History:
01	06/03/2013	Preparation of the Document.
02	06/08/2015	Inclusion of the items Scope (II), Supplementary Documentation (III), Concepts and Acronyms (IV), Responsibilities (V), Consequence Management (VII) and Exceptions (VIII). Adaptation of Purpose (I) regarding the concept of sustainability.
03	04/20/2018	Update of the entire policy in accordance with the Company's current guidelines.
04	04/23/2020	Update of the entire policy in accordance with the Company's current guidelines. Inclusion of Servinet Serviços Ltda, Aliança Pagamentos e Participações Ltda and Stelo S.A in the scope (II) of this Policy. Update of the Guidelines (III) presented in item 4 and adding of the policy on transactions with related parties and other situations involving conflict of interest.
05	04/20/2022	Update of items: I. Purpose, II. Scope, III. Guidelines sub-items 1, 3, 4, 9 and 10, IV. Exceptions, V. Consequence Management, VI. Responsibilities, VII. Supplementary Documentation and VIII. Concepts and Acronyms.
06	03/27/2024	Update of items: I. Purpose, II. Scope, III. Guidelines of sub-items 1, 2, 3, 4, 7, 8, 9, 10, IV. Exceptions, V. Consequence Management, VI. Responsibilities, VII. Supplementary Documentation, VIII. Concepts and Acronyms, IX. General Provisions.

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I. Purpose

This Financial Policy ("Policy") aims to ensure that the management of financial resources held by Cielo S.A. – Instituição de Pagamento ("Cielo") is executed/developed efficiently and under ethical, reputational, legal and socio-environmental standards, always seeking economically viable solutions to the long-term use of these resources.

II. Scope

All members of the Board of Directors and 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"), Aliança Pagamentos e Participações Ltda. ("Aliança") and Stelo S.A. ("Stelo"), 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. Carry out, according to the best practices and control principles, the financial management of the Company's cash, in accordance with the premises of the [Financial Investments Policy](#), so that the Company's finances are properly planned, executed and controlled, with the objective of ensuring financial health and business continuity, and so that the records adequately reflect the transactions and accounting positions, in compliance with the Brazilian legislation.
2. Support the Company's operations and services, ensuring compliance with its rules and regulations, particularly in accounting, tax, and financial/budgetary management.
3. Carry out all financial transactions using strict financial control systems and in accordance with the legislation in force, with the objective of ensuring the implementation of the settlement, arising from the transactions related to payment arrangements of which the Company is a participant to the respective accredited merchants and other financial operations related to financial management.
4. Hire and manage financial instruments using specific strategies outlined in the [Corporate Risk Management and Internal Controls Policy](#). These strategies are designed to ensure the maintenance of an appropriate level of liquidity, profitability, and security.

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5. Carry out budget planning and control allowing the systemic and aggregate management of all areas of the Company.
6. Ensure accounting, financial, budgetary, operational and asset control, promoting the development of reports on the assessment of the Company's performance, including the monitoring of costs and expenses, in order to disclose the figures to the Company's executives, as well as recommend and guide the alternatives of obtaining greater financial efficiency in the execution of the plans.
7. Ensure transparency and authenticity of the information generated by the financial area through the use of formal documentation, which serves as evidence for effective decision-making and legal protection.
8. Generate the accounting and financial statements, as well as performance reports targeted to the stakeholders, especially to investors, market analysts and partners, in order to provide relevant information for decision making with appropriate presentation, in accordance with the accounting practices adopted by the Company.
9. With respect to transactions involving related parties, the Company adheres to the guidelines and practices outlined in the [Policy on Transactions with Related Parties and Other Situations Involving Conflicts of Interest](#).
10. Calculate and monitor indicators for generating economic value and balancing growth, periodically, presenting the results to the Executive Board and the Board of Directors, recommending and advising on alternative actions to enhance the achieved indices, aligning with the principles of the Company's [Sustainability Policy](#).

IV. Exceptions

Exceptions, when applicable, are addressed immediately by the Executive Vice-Presidency of Finance and Investor Relations, following the current authorization limits and always in compliance with this Policy, supported by approvals, documents and/or contracts applicable under the current law and the Company's Rules.

V. 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.

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VI. Responsibilities

- **Administrators and Employees:** Observe and ensure compliance with this Policy and, when necessary, call the Finance area for consultation on situations involving conflict with this Policy, or upon the occurrence of situations described herein.
- **Executive Vice-Presidency of Finance and Investor Relations:** Ensure the efficient management of financial resources, adhering to best practices and control principles to support the Company's operations and services regarding administration, planning, control, and guaranteeing the rights associated with these resources, seeking economically viable solutions.
- **Executive Vice-Presidency of Risks, Compliance, Prevention and Security:** monitor the Company's exposure levels in relation to credit, liquidity and market risks.
- **Sustainability, Diversity and Corporate Responsibility Management:** support the finance department in surveying and valuing social, environmental and climate externalities, as well as making recommendations for improvements.

VII. Supplementary Documentation

- Company Bylaws;
- Company Code of Ethics;
- Legislation in effect at the federal, state, and municipal levels;
- Internal standards that are constantly improved, approved by the competent approval authority, and provided to all employees;
- [Financial Investments Policy](#);
- [Purchasing Policy](#);
- [Policy for Disclosure of Material Acts or Facts and Securities Trading](#);
- [Corporate Risk Management and Internal Controls Policy](#);
- [Tax Management Policy](#);
- [Stakeholder Relations Policy](#);
- [Sustainability Policy](#); and
- [Policy on Transactions with Related Parties and other Situations Involving Conflicts of Interest](#).

VIII. Concepts and Acronyms

- **Board of Directors:** a 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,

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investment, and financing decisions, among other matters provided for in article 142 of the Brazilian Corporation Law and/or the Company's Bylaws.

- **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.
- **Growth Balance:** indicator that seeks to assess the balance between the growth of the Company's turnover in relation to how much the Company can grow in a balanced manner. The calculation metric recommended by ISE B3 is the g/g^* ratio, where (g) = growth rate of the company's turnover; and (g^*) = rate at which the company can grow in a balanced manner, without compromising its financial health.
- **Externalities:** Activities that involve the imposition, involuntary or not, of costs or benefits, that is, those that have positive or negative effects on third parties without having the opportunity to prevent it and without having the obligation to pay them or the right to be indemnified. When the effects caused by the activities are positive, they are called positive externalities. When the effects are negative, they are called negative externalities.
- **Economic Value Creation:** refers to the calculation of the result obtained by the Company after deducting the cost of all invested capital. This indicator aims to measure whether an investment is bringing real gains to its shareholders. Examples of these metrics are the calculation of Economic Profit and Added Economic Value (EVA).
- **Stakeholders:** All relevant audiences, whether internal or external, consisting of people, groups, organizations, associations and other actors who influence or are influenced by the company's activities, products and services, and who may be impacted by its decisions, actions and performance. Examples of Stakeholders include, but are not limited to: suppliers, investors, employees, local communities, the press and civil society organizations.

IX. 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, March 27, 2024.

**Cielo S.A. – Instituição
de Pagamento**