

Title:	Financial Investments	Code:	PLT_029
VPE:	Finance and IR/ Treasury Superintendency	Version:	01

Revision History

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I. Purpose

Establish basic guidelines concerning the management of financial resources, observing the applicable regulations and best market practices.

II. Scope

This Financial Investment Policy (“Policy”) applies to all administrators (Officers, members of the Board of Directors and members of the Advisory Committees), members of the Audit Board and employees of the companies Cielo S.A., Aliança Pagamentos e Participações Ltda., Servinet Serviços 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

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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

Regarding the management of financial resources, the Company:

1. Considers the alignment between its risk profile, risk appetite, and strategy;
2. Always evaluates its risk exposure when there is the possibility of making new investments;
3. Assesses the risk of its Financial Investment Portfolio;
4. Performs the recovery of values from its Financial Investment Portfolio, triggering the Credit Guarantor Fund ("FGC") and/or the intervenor/liquidator of the Financial Institution in Default, when necessary;
5. Respects the liquidity goals of the financial resources according to the rules established in specific internal regulations about financial investments, which are the responsibility of the Treasury Superintendency;
6. Manages the indexes of the investments, in local and foreign currency, in order to identify market opportunities for a better management of the Company's financial resources, complying with the applicable rules and standards.

IV. Exceptions

Exceptions, when applicable, will be handled by the Executive Board or the Board of Directors, depending on the case and according to the applicable approval authority.

V. Consequence Management

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

Internally, non-compliance with the guidelines of this Policy gives rise to the application of accountability measures for the respective agents according to the severity of the non-compliance.

VI. Responsibilities

- **Administrators and employees involved in the process:**

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- Observe and ensure compliance with the Policy and, when necessary, call the areas involved in the process for consultation on situations involving conflict with this Policy or upon the occurrence of situations that can place the Company at risk;
- Ensure the segregation and definition of functions, attribution of responsibilities, and delegation of authorities that support the effective administration of financial resources.

▪ **Treasury Superintendency:**

- Evaluate the best investment opportunities for the Company, for the purpose of optimizing the profitability weighted by the associated risk;
- Control the Financial Investment Portfolio, according to the rules, indicators and limits established in the Financial Investment Standard;
- Invest and redeem investments according to the cash flow, strictly respecting the approval authorities established in the Financial Investment Standard;
- Make all the accounting records arising from the management of the Company's financial investments, in accordance with the accounting standards in effect, as well as meeting the respective auditing demands;
- Monitor the fluctuation of interest rates, exchange rates, and other financial indexes linked to the Company's Financial Investment Portfolio.

▪ **Risks, Compliance, Prevention and Security Board:**

- Evaluate the methodologies, metrics, and controls related to the management of financial resources;
- Monitor and report to the risk management governance instances the risk exposure indicators and limits.

VII. Supplementary Documentation

- Central Bank of Brazil ("Bacen") Circular no. 3.681, dated November 4, 2013;
- Risk Appetite Statement; Approval Authority Standard;
- Financial Investment Standard; Internal standards that are constantly improved, approved by the competent approval authority, and provided to all employees;
- Corporate Risk Management and Internal Controls Policy;
- Finance Policy;

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- Internal Regulations of the Risk Committee;
- Internal Regulations of the Board of Directors.

VIII. Concepts and Acronyms

- **Financial Investment Portfolio:** set of instruments that make up the Company's investments;
- **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, investment, and financing decisions, among other matters provided for in article 142 of the Brazilian Corporation Law and/or the Company's bylaws.
- **Default:** situation of full or partial default by the counterparty;
- **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;
- **FGC:** Credit Guarantor Fund, i.e., a private, non-profit entity that protects investors who put their money in financial institutions associated to it;
- **Financial Institution:** the one that acts as an intermediary between the client and some type of financial market service, such as making investments, loans, financing, among other services;
- **Financial Investment Standard:** normative instrument that mainly determines the types of financial investments allowed, eligible financial institutions, and allocation of resources by institution and product.

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 standards and procedures to the contrary.

Barueri, December 17, 2021.

Cielo S.A.

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(Financial Investment Policy approved at the Board of Directors' Meeting of Cielo S.A. on December 17, 2021)