

Title:	INFORMATION TECHNOLOGY	Code:	PLT_014
VPE:	Customer Experience	Version:	05

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) and Consequence Management (VII). Adaptation of Purpose (item I) regarding the concept of sustainability and replacement of the word Committee by Forum in item 6.4.
03	08/24/2017	Update of items I. Purpose, II. Scope, III. Supplementary Documentation, IV. Concepts and Acronyms, V. Responsibilities and all sub-items of the VI. Guidelines.
04	10/29/2019	Update of item II. Scope, V. Responsibilities, VII. Concepts and Acronyms and VIII. General Provisions.
05	12/17/2021	Update of items: I. Purpose, II. Scope, IV. Consequence Management, V. Responsibilities, VI. Concepts and Acronyms.

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I. Purpose

The purpose of this Information Technology Policy ("Policy") is to establish guidelines to leverage and sustain the strategies and business objectives of Cielo S.A., its subsidiaries and affiliates, through the management of the Information Technology ("IT") project portfolio and its technological structure, with efficiency, quality and safety, ensuring long-term sustainability.

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II. Scope

All administrators (officers, members of the Board of Directors and members of the Advisory Committees), members of the Audit Board and employees 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

1. Protect the Company's operations by reducing incidents and impacts on stakeholders and ensuring that all services are available, from the standpoint of capacity, continuity and monitoring of IT, networks and processing.
2. Ensure that the set of IT projects, services and processes remain cost-effective, keeping the Company's portfolio of IT projects up to date by monitoring and controlling costs, deadlines, resources and the quality of deliverables.
3. Manage the Company's IT and Projects areas, educating and training teams, improving system development processes and methodologies to make IT deliveries more agile and customer-oriented.
4. Provide information for strategic decision-making and alignment of the IT and Projects areas to the business, through the development of capture solutions, new platforms, best Software Engineering and Architecture practices, indicator panel, project portfolio, integrated IT processes and solutions perspectives.
5. Ensure compliance and reliability of the services infrastructure provided by the company through best practices, international standards and/or certifications, periodically controlling and following up on recommendations and requirements.
6. Ensure the continuity of the organization's operations in the event of extended unavailability of the resources that support the performance of such operations (equipment, information systems, facilities, people and data).

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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
- 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 Vice Presidency of Consumer Experience for consultation on situations involving conflict with this Policy, or upon the occurrence of situations described herein.
- **Vice-Presidency of Customer Experience:** 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.

VI. Supplementary Documentation

- [Cielo's Code of Ethics](#)
- Internal standards that are constantly improved, approved by the competent approval authority, and provided to all employees.

VII. Concepts and Acronyms

- **Affiliated Companies:** companies in which the Company holds 10% (ten percent) or more of their capital, without, however, controlling them, under the terms of article 243, paragraph 1 of the Brazilian Corporation 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.

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- **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, investors, employees, society, clients, suppliers, creditors, governments, regulatory bodies, competitors, press, associations and class entities, users of electronic means of payment, and non-governmental organizations.

VIII. General Provisions

Cielo S.A.'s Board of Directors is responsible for amending 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, December 17, 2021.

Cielo S.A.