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Title	DIVERSITY & INCLUSION	Code	PLT_030
VP/Board	People, Management and Performance VP	Versio n	02

Revision History

Version	Approval Date:	History:
: 01	17/12/2021	Preparation of the document.
02	29/11/2023	Update of items: I. Purpose, II. Scope, III. Guideline sub-items: 1.1; 2.2; 2.3; 2.4; 2.5; 3.1; 3.2; 3.3; 3.4; 3.5; 4.1.1; 4.1.2; 4.1.3; 4.2.1; 4.2.2; 4.2.3; 4.3.1; 4.3.3; 4.3.4; 4.4.1; 4.4.3; 4.4.4; 4.5.1; 4.5.2; 4.5.3; 4.5.5; 4.6.1; 4.6.3; 4.6.4 and 4.6.5, IV. Consequence Management, V. Responsibilities, VI. Supplementary Documentation, VII. Concepts and Acronyms and VIII. General Provisions.

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I. Purpose

To establish guidelines and governance to make the Company more inclusive, in line with the Commitments of Cielo S.A. – Instituição de Pagamento ("Cielo") and the Diversity and Inclusion strategy.

Increasing the representation of minority social groups in the workforce, promoting an inclusive culture, respecting people and repudiating all forms of discrimination, as provided for in the <u>Code of Ethics</u>.

II. Scope

All Members of the Board of Directors and the Executive Board

("Directors"); members of the Advisory Committees and the Supervisory Board;

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employees, including outsourced workers, interns and young apprentices ("Employees") of the companies Cielo, Servinet Serviços Ltda. ("Servinet"), Stelo S.A. ("Stelo") and Aliança Pagamentos e Participações Ltda. ("Aliança"), 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. Ethics in all relationships

- 1.1. Ethics is a premise for the relationship with all audiences Company engages with, such as: Officers, members of the Audit Board, employees (including outsourced workers), interns, young apprentices, Subsidiaries and Affiliates, shareholders, investors, banks, brands, clients, suppliers, competitors, government, regulatory bodies, press, community, society, users of electronic means of payment, among others.
- 1.2. The Company's ethical principles are set out in the <u>Code of Ethics</u>.

2. Diversity, respect and human rights

- 2.1. As established in the <u>Code of Ethics</u> and the <u>Sustainability Policy</u>, the Company values human diversity and dignity and rejects any form of intimidation, prejudice, discrimination (due to gender, disability, origin, religion, skin color, race, ethnicity, sexual orientation, marital status, age, health and/or social condition) or harassment (sexual, moral, religious, economic, political or organizational). Nor does it tolerate physical and/or verbal aggression, disrespect, embarrassment and/or humiliation.
- 2.2. 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.
- 2.3. 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 <u>Universal Declaration of Human Rights</u> and values the right to life, to freedom of expression, and to security. These principles are the basis for justice, freedom, and peace.
- 2.4. The Company is a signatory to the <u>United Nations Global Compact</u>. Commitment to Human Rights is a reference not only for Employees and Directors, but

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also for the Company's other stakeholders. The Ten Principles of the United Nations Global Compact provide Human Rights, Labor, Environment and Anti-Corruption guidelines.

2.5. The development and performance of the Company's economic activities are in compliance with legal and other requirements applicable to diversity and inclusion issues, in accordance with the applicable legislation.

3. Equal Opportunity

- 3.1. The company values equal opportunities and diversity and believes that everyone should have the same conditions for professional growth. This right must be ensured by all professionals involved in the hiring and people management processes.
- 3.2. The Company understands that a work environment with equal opportunities and inclusive for all diverse profiles is a condition that leverages the business strategy, generating product development innovation and more consistent results.
- 3.3. The Company recognizes that the social, economic and cultural context in which it operates poses structural barriers that compromise fair and equal access to opportunities. The Company will make every effort to remedy these differences and will seek to ensure that equal opportunities offer greater social justice in its recruitment and career development processes.
- 3.4. The Company undertakes to monitor compensation metrics, especially with regard to gender, race and people with disabilities, enabling pay disparity analysis.
- 3.5. The Company will endeavor to combat wage disparity in order to maintain equitable compensation.

4. Commitments

4.1. Inclusive Leadership

- 4.1.1. The company is committed to the development of engaged leadership that takes an active and leading role in promoting Diversity and Inclusion.
- 4.1.2. The Company seeks to develop its leadership in inclusive behaviors, which includes members of the Board of Directors and other members of the leadership, so that they ensure a respectful and fair treatment of evryone at work, respecting and supporting human rights, non-discrimination, promoting talent development and growth.
- 4.1.3. As a way of keeping up with pioneering market trends and movements, the Company seeks to participate in external diversity-oriented networks

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and communities and to make public commitments regarding Diversity and Inclusion.

4.2. Representation

- 4.2.1. The Company is committed to racial, gender, LGBTQIA+ and disabled inclusion at all levels, ensuring that recruitment and selection processes are guided by affirmative actions that can reduce inequalities in representation between the internal scenario and Brazilian demographics.
- 4.2.2. The Company seeks to represent minority groups at the different levels of the Company, as well as in its succession plan.
- 4.2.3. The Company seeks to offer equal opportunities, fostering affirmative actions to enhance the attraction, recruitment and selection of diverse applicants.

4.3. Career Development

- 4.3.1. The Company undertakes to support the career development of minority groups to ensure equal opportunities in promotions and transfers, and actively fighting unconscious biases.
- 4.3.2. The company seeks to ensure an accessible and inclusive infrastructure, in addition to assistive tools, according to individual needs, such as physical accessibility and work tools, aiming to eliminate barriers to professional development.
- 4.3.3. The Company seeks to promote the professional development of Employees belonging to minority groups, offering education, training and mentoring programs and actions to support their careers.
- 4.3.4. The Company seeks to take actions to mitigate biases in the different decision-making processes, including those relating to the career development of its employees.

4.4. Inclusive Culture

- 4.4.1. The Company is committed to developing an Organizational Culture of fight against chauvinism, racism, disability discrimination and LGBTphobia, playing a leading role in the promotion of diversity and inclusion so that this is incorporated becomes by all Employees as a trait of the organizational culture.
- 4.4.2. The Company strives to promote the health, safety, and well-being of all its staff members, considering their different needs, including benefits and Human Resources policies.

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- 4.4.3. The Company seeks to raise awareness, train and continually educate Employees and partners on respecting differences and promoting diversity and inclusion.
- 4.4.4. The Company seeks to build internal communication, marketing, and advertising actions from an inclusive perspective to promote an active positioning in favor of Diversity and Inclusion.

4.5. Guidance for stakeholders

- 4.5.1. The Company is committed to fostering the social-productive inclusion of minority groups, supporting social innovation that encourages Diversity and Inclusion throughout the value chain.
- 4.5.2. The Company supports and seeks to promote diversity appreciation policies in its value chain and seeks to hire suppliers that are engaged and practice diversity and inclusion, in line with the guidelines defined in this Policy.
- 4.5.3. Cielo fosters transparency and dialogue throughout its value chain and encourages good social, environmental, governance and diversity and inclusion practices, especially in the relationships established with the Company, striving for the protection of human rights and fundamental freedoms, which must be respected and implemented in accordance with the <u>Code of Ethics</u>.
- 4.5.4. The Company seeks to promote diversity through community-oriented initiatives in its social investment axis as laid out in the Sustainability Policy.
- 4.5.5. The Company seeks to leverage diversity and inclusion in the planning of products, services and customer service.

4.6. Internal Structure

- 4.6.1. The Company is committed to ensuring a formal structure to promote the diversity and inclusion agenda, channeling and allocating efforts, teams and resources.
- 4.6.2. The Company works to set goals, measure, document, and disclose its progress in promoting diversity.
- 4.6.3. The Company offers and seeks to continuously improve its Ethics Channel, enabling the reporting of cases of deviations from the <u>Code of</u> <u>Ethics</u>, including those associated with diversity.
- 4.6.4. The Company encourages, strengthens and promotes internal communities or forums on Diversity and Inclusion to constantly advance the agenda and the engagement of employees.

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4.6.5. The Company manages diversity and inclusion through a formally established governance structure, and allocates resources and staff for the development and continuous improvement of the processes that support the achievement of the commitments provided for in this Policy.

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, and may or may not identify themselves:

- <u>www.canaldeetica.com.br/cielo</u>
- 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.

V. Responsibilities

• Officers and Employees:

 Observe and ensure compliance with this Policy and, when necessary, call the Sustainability, Diversity and Impact Department for consultation on situations involving conflict with this Policy or upon the occurrence of situations described herein.

• Sustainability, Diversity and Impact Management (Executive Vice President for People, Management and Performance):

- Comply with the guidelines established in this Policy, keep it updated to ensure that any changes are incorporated into it, and clarify any doubts regarding its content and application, as well as organize and articulate the strategy for compliance with the Guidelines herein, with regard to the internal and external target audiences, seeking alignment with the best market practices;
- Coordinate the implementation of the Company's Diversity Program;

Affinity Groups

 To serve as a welcoming space, i.e. a safe environment for those taking part, enabling active listening to its members, ensuring the engagement and coordination of all group members.

Sustainability Committee

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 Proposing and monitoring the execution of projects that improve the Company's sustainability practices in the social, environmental, and economic dimensions, arising from the Strategic Sustainability Plan.

• Executive Marketing Superintendency:

- Define, execute and disseminate the general diversity and inclusion actions at the Company, both internally and externally, with support from the Sustainability, Diversity and Impact department, according to the communication strategy defined for the topic.
- Executive Vice Presidency of Legal and Government Relations:
 - Analyze documents, affirmative policies and any issues or actions related to diversity and inclusion from a legal perspective, in order to safeguard the Company's operations according to the applicable legislation.

• Executive Audit Superintendency:

 Investigate complaints registered on the Ethics Channel, contemplating the Diversity and Inclusion topic at the Company, aligned with the Guidelines set forth in this Policy and the <u>Code of Ethics</u>.

• Executive Superintendency of Organizational Development (Executive Vice President for People, Management and Performance):

- Define and execute, in conjunction with the Sustainability, Diversity and Impact area, strategic actions for the professional and cultural development of the Company's Employees and managers, as well as recruitment and selection actions in line with the Guidelines set out in this Policy, in addition to the Company's Human Resources Policy.

• Executive Superintendency of HR Products and Services: (Executive Vice Presidency for People, Management and Performance):

 Define, execute and monitor the metrics related to remuneration, in conjunction with the Sustainability, Diversity and Impact area, to guarantee the strategic actions for the professional and cultural development of the Company's Employees and managers, in line with the Guidelines set out in this Policy, in addition to the Company's Human Resources Policy.

• Diversity Forum:

- Analyze and issue a recommendation to the Executive Board on the diversity and inclusion strategy to be adopted by the Company, as well as issue a recommendation on its effectiveness, proposing any necessary changes to the Executive Board;
- Analyze and propose possible adjustments to the Company's normative instruments that deal with the issue of diversity, issuing a recommendation to the Company's Executive Board, if applicable;

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Analyze and issue a recommendation to the Executive Board on the work plan and actions mapped within the scope of the Company's diversity program, as well as other matters related to the Forum's activities; and

- Define and monitor indicators for promoting diversity and inclusion in order to identify priority points for corporate action.

• Executive Corporate Governance Superintendency:

 Liaison with: (i) Controlling Shareholders; (ii) Directors; (iii) members of the Fiscal Council and Advisory Committees, as well as any of the Company's bodies with technical or advisory functions, created by statutory provision, and those that may acquire this status, in order to clarify and/or direct doubts about the documents mentioned and/or pertinent to this Policy.

VI. Supplementary Documentation

- Code of Ethics;
- <u>Universal Declaration of Human Rights;</u>
- <u>Diversity & Inclusion Manifesto;</u>
- <u>United Nations Global Compact;</u>
- <u>Human Resources Management Policy;</u>
- Sustainability Policy;
- Other Company Policies and Standards that are constantly improved, approved by the competent authorities and made available to all Employees.

VII. Concepts and Acronyms

- Affirmative Actions: These are political or institutional measures that aim to balance the scales and put an end to the social, cultural, and economic exclusion of individuals belonging to groups that suffer any kind of discrimination.
- **Anti-ableism:** Conduct that goes against ableism and actively works to reduce inequalities with respect to people with disabilities.
- **Anti-LGBTphobia:** Conduct that goes against LGBTphobia and actively works to reduce inequalities with respect to LGBTQIA+ people.
- Anti-sexist: Conduct that goes against sexism and actively works to reduce gender inequalities.
- **Anti-racist:** Conduct that goes against racism and actively works to reduce racial inequalities.

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- **Bullying:** Abusive conduct (gestures, words, behavior, attitudes) that, by their repetition or systematization, attack the dignity, psychological or physical integrity of a person, threatening their employment or degrading the work environment.
- **Sexual Harassment:** A crime defined in article 216-A of the Penal Code as "embarrassing someone with the intention of obtaining sexual advantage or favor, when the agent takes advantage of his/her condition of hierarchical superiority or ascendancy inherent to the exercise of a job, position or function."
- **Disability:** Long-term impairments of a physical, mental, intellectual, or sensory nature which, in interaction with various barriers, may hinder their full and effective participation in society on an equal basis with others.
- **Human Rights:** Human rights are standards that recognize and protect the dignity of all human beings. Human rights govern the way individual human beings live in society and with each other, as well as their relationship to the State and the obligations the State has toward them.
- 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."

- **Ethnicity:** The set of customs, traditions and beliefs attributed to a social group. It is also a form of cultural identification (marked by physical characteristics, origin, and set of customs).
- **Assistive Tools:** Any item, equipment or part thereof, product or system manufactured in series or custom-made used to increase, maintain or improve the functional capabilities of people with disabilities.
- **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.
- Affinity Groups: These are groups that hold recurring meetings to share information, knowledge, or to define actions that can be taken, stimulating the engagement of other employees. Affinity groups can focus on gender, race and ethnicity, disability, LGBTQIA+ community, generations (different ages), among other characteristics shared by members.
- **Minoritized Groups:** The term "minoritized groups" has the conceptual meaning of social segments that, regardless of quantity, have little social, economic (insertion in the job market, occupation of positions of power, and other), and political representation.

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- **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.
- Accessible Infrastructure: A set of complementary and indispensable aspects and dimensions for there to be effective inclusion of people with disabilities. There are six types of accessibility: attitudinal (related to attitudes), architectural, communicational, instrumental (related to tools), methodological (related to teaching and work methods), and programmatic (related to public policies, laws, regulations).
- LGBTQIA+: Each letter represents a group of people: Lesbians (women who are sexually attracted to or maintain an affectionate and/or sexual relationship with another woman), gay (people who are sexually attracted to and/or maintain a loving relationship with an individual of the same sex), bisexual (sexual attraction or sexual behavior directed toward both men and women, or more than one sex or gender), transgender (people whose gender identity differs from their physical biological sex), or transvestite (people whose gender identity differs from their physical biological sex), queer (people who do not feel physical and/or sexual attraction to either sex or gender), intersex (people who are born with biological sex characteristics that do not fit into the typical categories of female or male), asexual (people who do not feel sexual attraction) and the "plus" symbol at the end of the acronym appears to include other gender identities and sexual orientations that do not fit into the cis-heteronormative standard (heterosexual people, that is, people who feel affectionate/sexual attraction only for the sex/gender different from their own), but that are not highlighted before the symbol.
- LGBTphobia: Crime provided for in law no. 7.716/1989. In 2019 in Brazil, in the face of the lack of specific legislation on LGBTphobia, the STF equated homophobia (rejection or aversion to homosexuals and homosexuality) and transphobia (negative, discriminatory or prejudiced attitudes, feelings or actions against transgender people, or those who recognize themselves as such) to the provisions of law 7.716, the same one that addresses the crime of racism.
- **Sexual Orientation:** The sexual or affectionate attraction (involuntary and inherent) that a person feels for other people.
- **Race:** The set of habits, beliefs, and behaviors shared by people who also have similar physical characteristics (usually expressed by skin color). In other words, race is the physical mark of a culture.
- **Racism:** The set of habits, beliefs, and behaviors shared by people who also have similar physical characteristics (usually expressed by skin color). 7.716/1989, which concerns discriminatory conduct directed at a certain group or collective. The racism law classifies a series of situations such as: refusing or preventing access to a commercial establishment, preventing access to social entrances in buildings, discriminating in employment relationships, among others. Conceptually, racism is broader than insult, because it aims to affect an indeterminate collective of individuals, discriminating against the whole of an ethnic group and a race.

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- Stakeholders: Stakeholders are 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.
- Unconscious Bias: These are mechanisms of the human brain explained by neuroscience as resulting from brain formation and organization, based both on our life experiences and environments and on an ancestral or primitive heritage. When a value judgment is associated with this unconscious bias, prejudice and discrimination can be generated.

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, November 29, 2023.

Cielo S.A. – Instituição de Pagamento