Sustainability Report

2025

lwsa

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About the report

GRI 2-2, 2-3, 2-14

LWSA's Annual Sustainability Report is now in its fifth edition, covering the period from January 1st to December 31st, 2025. In this publication, we report, with maximum transparency and attention to best practices, our main achievements during this period, within our strategy of advancing sustainable actions in the three pillars of governance, social responsibility, and environment, and our purpose of generating a positive impact on society.

The report was developed based on the standards of Global Reporting Initiative (GRI) and MSCI ESG ranking. This ensures greater comparability and consistency of the information presented, in addition to being aligned with the Sustainable Development Goals (SDGs) of the United Nations (UN).

This publication gathers information about the activities carried out by the operating companies that make up the two main segments of our ecosystem, Be Online & SaaS and Commerce: LWSA S/A, Locaweb Telecom, Etus, KingHost, Delivery Direto, Connectplug, Tray, Yapay, Wake, Ideris, Melhor Envio, Vindi, Bagy Sul, Credisfera, Samurai, Bling, Pagcerto, Bagy, Octadesk, Síntese, Qint. Regarding significant changes in our structure and value chain compared to the previous reporting period, we report that, at the end of fiscal year 2025, the operations of Squid (Wake Creators) and part of Nextios were strategically divested to the domestic market, in line with our capital allocation discipline and pursuit of profitability focus.

LWSA leads a highly integrated digital ecosystem, functioning simultaneously as a holding company and an operational unit. The parent company exercises full control (100%) over several brands within the ecosystem, which operate as direct subsidiaries, in addition to managing wholly-owned subsidiaries in strategic sectors such as e-commerce, ERP, and infrastructure services. This centralized configuration allows the group to maintain agile governance and uniform strategic alignment across all its areas of operation. All acquisitions made to date have been fully incorporated by LWSA.

The information disclosed in this report, as well as all initiatives and decisions related to ESG, are analyzed and approved by the Board of Directors, our highest governance body.

If you have any questions or suggestions regarding this report, we suggest contacting: ri@lwsa.tech.

LWSA's sustainability strategy is based on the convergence between business growth and the generation of shared value, using the Ten Principles of the Global Compact and the Sustainable Development Goals (SDGs) as cross-cutting guidelines. The initiatives detailed in this report, ranging from emissions neutrality and energy efficiency (SDGs 13 and 7) to the promotion of diversity, technological education and fostering entrepreneurship (SDGs 4, 5, 8 and 10), reflect our non-negotiable commitment to Human Rights, Decent Work, Environmental Protection and Anti-Corruption. By aligning our actions with this global agenda, we reaffirm the role of technology as an engine for inclusion and responsible innovation, ensuring that our institutional evolution directly contributes to the challenges of our society.

Reading tools

Summary

Interactive

If you have any questions or suggestions regarding this report, we suggest contacting: ri@lwsa.tech.

External link

GRI 2-2, 2-3, 2
GRI 2-2, 2-3, 2

GRI indicators



Rafael Chamas
CEO LWSA

I am proud to present another edition of our Sustainability Report, a clear reflection of the company's consistent evolution and our commitment to generating value in a responsible, integrated, and long-term manner.

The year 2025 definitively marks the consolidation of our business model transition. We are no longer recognized solely as a hosting company, but are positioning ourselves as a complete business digitalization ecosystem. Today, we support our clients throughout their entire journey, from digital presence to management, including sales, payments, credit, and logistics—reducing barriers and expanding growth opportunities.

This progress also translates into our market relevance. We achieved a 20.8% share of the Brazilian e-commerce market and continue to expand our customer base, which grew by 6.8% in 2025, reaching more than 206,000 active companies in Commerce alone. This performance is accompanied by a consistent evolution of our results, with a 10.3% growth in consolidated net revenue and margin expansion, reinforcing the solidity of our business model.

Another fundamental pillar of our strategy is Information Security, which we treat not only as a technical discipline, but as part of our DNA. In an increasingly digital and interconnected environment, ensuring data protection and business continuity for our clients is an essential competitive advantage – and a responsibility we take very seriously.

Similarly, we are advancing the ethical use of Artificial Intelligence. Our approach is clear: to use technology to increase internal productivity and, above all, to help our more than 700,000 clients sell more, with simpler processes and more integrated journeys. We do this with responsibility, transparency, and a focus on positive impact.

Our role as an ecosystem has also been strengthened through the expansion of strategic partnerships with some of the leading global players in digital retail, such as TikTok Shop, Temu, Amazon, Mercado Livre, and Shopee. These integrations consolidate LWSA as a fundamental link between Brazilian entrepreneurs and major marketplaces, expanding the reach and competitiveness of our clients.

Internally, 2025 was a year of significant structural gains. The unification of operations under a single CNPJ (Brazilian tax ID) strengthened our operational efficiency and consolidated the "one team" culture. This movement is symbolized by our positioning "The Best of Us," which reflects the integration of our units and alignment around a common purpose.

We have also made consistent progress on our environmental agenda. Our data centers are powered by 100% renewable electricity and remain committed to carbon neutrality. These initiatives reflect our long-term vision and understanding that growth and environmental responsibility go hand in hand.

We remain committed to a sustainability strategy that integrates economic growth, social responsibility, and sound governance. Our initiatives are aligned with global best practices and the Sustainable Development Goals, reinforcing the role of technology as an engine for inclusion, innovation, and transformation.

Looking to the future, we will continue to evolve with discipline, responsibility, and ambition. We believe our role goes beyond providing technology: we are strategic partners to thousands of businesses that drive the Brazilian economy.

Together, we continue transforming businesses so they can grow and thrive.

Who we are

LWSA

GRI 2-1

LWSA is today an ecosystem of solutions that accompany entrepreneurs throughout their digitalization journey, regardless of their segment or size. This commitment is summarized in our official purpose, which connects and strengthens the entire ecosystem: 'We transform businesses to grow and prosper through technology'. It is this that awakens the best in us and gives meaning to our collective journey.

Today, we position ourselves in the market as an Integrated Solutions Platform. We have built a perennial operational infrastructure that allows digital retail to function from end to end.We have a very sustainable business model, whether through leading and established products, or through subscriptions. Our services include: e-commerce platform; ERP; marketplace integration; POS; recurring payments; lead generation; payments; credit and logistics; among others.

Currently, we are one of the largest technology groups in Brazil. Throughout our 29 years of operation, we have kept pace with the dynamism of the technology and e-commerce market, evolving into a Software as a Service (SaaS) business model that brings together e-commerce platforms. We were one of the pioneers in Brazil in Business to Business (B2B) solutions for the digital transformation of businesses. Our business journey began with Locaweb in 1997, with a single server located in California (USA) on the Windows platform. Later, we launched our website hosting service also on the Linux platform.

In February 2020, Locaweb (LWSA3) went public on the Brazilian Stock Exchange. With the investments raised, we made strategic acquisitions of companies that complement our portfolio of solutions. We remain focused on innovation, always seeking to anticipate the demands of the market and our clients.
Since 2023, we have adopted the new brand LWSA, which, in addition to being the company's abbreviation for shares traded on the B3 stock exchange since its inception, also reinforces the sense of belonging and unity, creating an integrated corporate culture. It more clearly represents, to the market, our portfolio of solutions across our five business verticals.

Our headquarters are located in São Paulo, and we have business units spread across six other Brazilian cities: Marília (SP); Belo Horizonte (MG); Curitiba (PR); Porto Alegre (RS); Novo Hamburgo (RS); and Bento Gonçalves (RS).



Our values

Our values are the compass that guides our decisions, behaviors, and the way we lead. Formalized in our "Culture Book," they translate the essence of our ecosystem and define the non-negotiable commitments we uphold together:

We exist for the customer:
We feel the customer's challenges as our own and create solutions that generate real value.

We play together:
We act collaboratively, without silos, putting the success of the ecosystem above individual interests.

We take responsibility:
We act with a sense of ownership (accountability), tackling problems head-on and delivering with excellence.

We focus on what really matters:
We prioritize intelligently, simplify processes, and act with a sense of urgency.

We seek consistent and lasting results:
We balance speed with quality, aiming for the business's long-term viability.

We are honest in our relationships:
Integrity is not a choice, it's fundamental. We value transparency and consistency between words and actions.

We question, learn, and evolve:
We have the courage to innovate and the humility to learn from our mistakes, transforming lessons into progress.



Business verticals and brands

GRI 2-6

At LWSA, our clients see their companies born and grow, supported by all the tools we offer to help them thrive in the digital world. This includes sales channels, greater efficiency in logistics management, better cash flow management through ERP systems, and access to credit when needed, all aimed at expanding their businesses.

We are a constantly growing ecosystem, and currently hold 20.8% of the e-commerce market. We operate in two major business segments: BeOnline and Software as a Service & Solutions (BeOnline/SaaS), and Commerce; subdivided into five macro segments of our organizational structure, our business verticals.

Our value chain is designed with the central purpose of reducing friction in our clients' digital journey, going far beyond simply providing technology; we position ourselves as a true strategic business partner.

LWSA's ecosystem is structured around continuous innovation cycles, supported by four main activities: ongoing Research and Development (R&D); Critical Infrastructure Management (ensuring the availability of simultaneous operations in our data centers and clouds); Ecosystem Integration for a unified experience; and Customer Success, ensuring that our technology translates into effective results. With a strong presence in the Brazilian market, we democratize access to technology, from individual entrepreneurs and Small and Medium Enterprises (SMEs) to transnational corporations, in addition to fostering a robust ecosystem of partner agencies and developers.

The year 2025 consolidated LWSA's transformative milestone, marking the definitive transition from a company focused on hosting to a complete business digitization ecosystem. Currently, approximately 70% of revenue comes from the Commerce vertical, which integrates platform, payment, and logistics solutions. This maturation allowed for the full operational integration of the acquired units, eliminating segregated structures and maximizing efficiency and scale gains.

We celebrate the consolidation of the LWSA ecosystem, reaping the benefits of incorporating the Business Units into the Holding company and unifying administrative and human resources management under a single CNPJ (Brazilian tax ID). This strategic repositioning, now matured, has transformed the Company into a 'one-team' structure, leveraging synergies that drive cross-selling, optimize acquisition costs, and reduce churn through a fluid and integrated customer journey. With solid governance, marked by the completion of the CEO succession plan, and clear guidelines established in the 2025-2029 Strategic Plan, we operate today with unified indicators and a total focus on delivering value, ensuring that operational efficiency translates into lasting results and an expanded portfolio of possibilities for clients and employees.



Digital solutions ecosystem

Macro segment	Brands	Services offered
Be Online /SaaS	locaweb, octadesk, kingHost	It offers social media management, digital presence, and cloud computing services to enable clients' online presence.
SMB Commerce Platform	tray, melhor envio, bagy, CPlug	Solutions for online sales in e-commerce and marketplaces, including integration with platforms, ERPs, and sales channels.
Enterprise Commerce Platform	wake	A flexible system for retailers and manufacturers, offering multi-channel integrations and improvements in customer experience and revenue management.
ERP and management	bling!	A single platform that integrates data from employees, sales, suppliers, and customers, both in the digital environment and at the point of sale.
Financial services	Vindi	Financial solutions to scale businesses, simplify management, and automate payments and personalized credit.

Materiality

GRI 3-1, 3-2

In 2025, we continued the strategy based on our Materiality Matrix, developed in the previous cycle from the perspective of dual materiality (impact and financial). The study, which follows the guidelines of the Global Reporting Initiative (GRI), remains the main guide for our sustainability management and reporting.

The definition of these priority themes was the result of a robust process that included:

- Benchmarking and References: Analysis of global frameworks (GRI, SASB, MSCI, World Economic Forum, Sustainalytics etc.) and industry peers.
- Internal documents: Analysis of the Reference Form, Risk Matrix, and comparative analysis with industry peers.
- Engagement: Active listening to leaders, investors, employees, suppliers, and customers.
- Validation: Calibration with C-Level executives and approval by the ESG Committee.

The materiality matrix was defined based on the perspectives of the following stakeholders and experts: Board; Investors; Directors; Employees; Clients.

This approach ensures that social, environmental, and governance performance is aligned with the real impacts of the business and market expectations, while maintaining consistency in indicators and long-term goals.

LWSA material topics:

- Responsible governance (encompassing Ethics, Compliance, Corporate Governance and Transparency)
- Information security (encompasses data protection and privacy)
- Customer experience (Focus on customer satisfaction)
- Innovation and technology (Focus on entrepreneurship)
- Employee journey (Attraction, development and retention; Health and well-being)

We also included the theme of Mitigation and Adaptation to Climate Change in our strategy as a representation of LWSA's long-term vision and our commitment to the transition to a low-carbon economy.

Impact Study

The Company's impact study was conducted in parallel with the materiality process, allowing for the identification of the most relevant impacts of our activities and business relationships on the economy, the environment, people, and the business itself.

The process ensured that the materiality analysis focused on the effects, real or potential, of the Company's activities. Its construction and validation stemmed from a sector-specific diagnosis and internal documents to map positive and negative impacts.

The analysis was validated and refined to reflect LWSA's business model, its value chain, and stakeholders. The scope and depth of the assessment covered the Company's influence in four dimensions: Environment (effects on natural resources and ecosystems); People and Human Rights (impacts on employees, communities and society); Economy (contributions and externalities to regional and sectoral development); and Business (Continuity), encompassing risks and opportunities for the company's resilience and financial sustainability.

The calibration of impacts used quantitative and qualitative indicators from diverse data sources and multidimensionality, such as Governance and Management (ESG ratings, audits, risk matrices, compliance, ombudsman and complaints) and Market and Stakeholders Perception (Climate surveys, feedbacks of shareholders and customers, media studies).

This multivariate approach ensures that the materiality of the LWSA is not merely a statistical exercise, but a true reflection of our corporate responsibility and our role in advancing sustainable development.

Highlights

- The robustness of the ecosystem fueled the 6.8% growth in the subscriber base of commerce in 2025, reaching 206,300 active customers. This volume confirms our relevance, representing 20.8% of Brazilian e-commerce.

- Distribution of 216.7 million to shareholders through share buybacks and dividend payments.

- Growth of 15.3% in subscription revenue from e-commerce platforms in 2025.

- Significant expansion of 1.3 p.p in the Company's adjusted EBITDA margin, compared to 2024.

- We carried out the Culture Roadshow, a seven-day journey through seven Brazilian cities, allowed our leadership to connect with over 3,000 employees. This movement of active listening and genuine exchange reaffirmed our values and positioned the LWSA culture as the main catalyst for our strategy.

- In 2025, LWSA expanded its dialogue with the technology and retail ecosystem by actively participating in events such as ABF Franchising, the E-Commerce Brazil Forum, and the Entrepreneur Fair, strengthening our reputation and generating high-impact connections.

- Our integration capabilities reached new heights in 2025. We strengthened strategic partnerships with global players such as TikTok Shop and Temu, which add to our solid portfolio of connections with Amazon, Mercado Livre, Shopee, and SHEIN, consolidating LWSA as the vital link between Brazilian retail and major global marketplaces.

- A solid strategy for electricity consumption in the data center, through the purchase of 100% renewable energy, proven by the purchase of I-REC.

- We remain committed to controlling atmospheric emissions, which is achieved through the comprehensive mapping of scopes 1, 2, and 3 in all our units and towards achieving 100% neutralization of our 2024 emissions.



2025 Achievements

lwsa

- Integration into the B3 Efficient Carbon Index portfolio (ICO2 B3).
- Extel Awards (formerly Institutional Investor) 2nd place: **Best Company Board:**
  - 1st place: Best IR Professional (Investor Relations)
  - 2nd place: Best IR Program (Investor Relations Program)
  - 1st place: Best IR Team (Investor Relations Team)
  - 3rd place:Best ESG Program

Vindi

- RA1000 seal on Reclame Aqui (Brazilian consumer review website).
- Top 3 in the Financial Solutions for E-commerce category of the ABComm Award.

tray

- RA1000 seal on Reclame Aqui.
- Amazon Evolution 2025 - Featured Partners of the Year.
- TikTok Shop - Anchor Award 2025.
- Amazon Evolution 25/26 - "Connected to the Customer" seal.

locaweb

- RA1000 seal on Reclame Aqui.
- 1st place in the Large Hosts category of the Reclame Aqui Award - for the 5th consecutive year.
- Recognized as the 2nd best hosting company by Reclame Aqui.

2025 Achievements

kingHost

- RA1000 seal on Reclame Aqui.
- 1st place in the Hosts category of the Reclame Aqui Award.
- Recognized as the #1 ranked Best Hosting Companies by Reclame Aqui (Brazilian consumer review website).

bling!

- TikTok Shop - TikTok Catalyst Award 2025
- Amazon Evolution:
  - Amazon Mentor - Customer Connected category.
  - Integrators - Customer-Centric category.

octadesk

- Official Meta Business Partner (since 2023).
- MIT Technology Review Brasil: seal Innovative Workplaces 2025.
- IT Inside: Rodrigo Ricco, General Director of Octadesk, was elected the best Customer Service columnist.
- B2B Awards 2025 (B2B Stack): Top 3 Omnichannel Customer Service Platforms; Top 5 Contact Center Software.
- 5 awards by the G2 platform.

wake

- Finalist for the ABComm Award in the Best E-commerce Platform category.

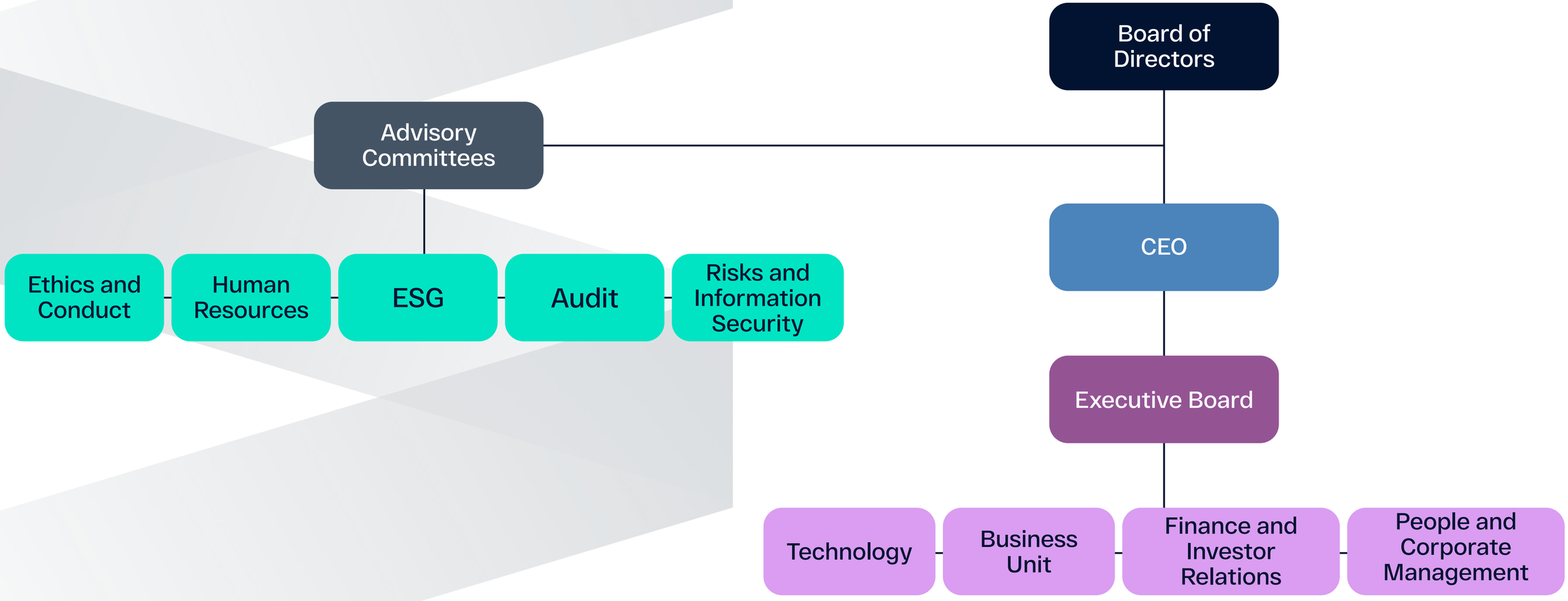
Governance

Governance Structure

GRI 3-3 Material topic: Corporate governance and compliance

Listed on the B3 in Brazil's highest corporate governance segment, the new market, we rigorously adhere to the policies and committees required for this level of governance. Our board of directors is composed of the Company's founders and experienced market professionals who have held senior positions in other relevant companies in their respective sectors.

Governance structure:



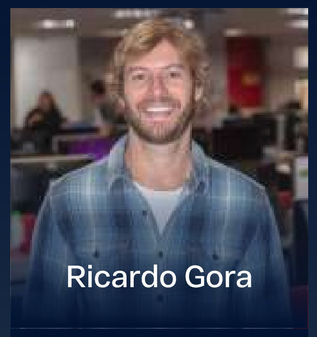
Board of Directors

GRI 2-9, 2-10, 2-11, 2-12, 2-13, 2-16, 2-17, 2-18

The Company's Board of Directors is a collegial decision-making body responsible for establishing our general business policies, including our long-term strategy. It is also responsible, among other duties, for overseeing the management of our Executive Board, as well as for evaluating and guiding due diligence to identify and manage risks and opportunities, including in the ESG pillars.

According to the Company's Articles of Association, it must be composed of a minimum of five and a maximum of eight effective members, with at least two or 20% (twenty percent), whichever is greater, being Independent Directors, as defined by the New Market Regulations.

Currently, it is composed of 8 (eight) members, including 3 (three) independent members, all elected by the General Shareholders' Meeting, for a unified term of 2 (two) years, with reelection permitted. The Board meets ordinarily every three months and extraordinarily whenever necessary.



Ricardo Gora

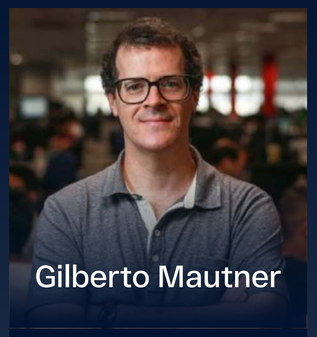
Gender
Man

Executive or non-executive function
Chairman of the Board of Directors.

Independence
No.

Mandate
Until the 2027 ASM

Number of other functions and commitments, as well as the nature of those commitments
(3) Chairman of the Board of Directors; Member of the ESG Committee; Member of the Human Resources Committee.



Gilberto Mautner

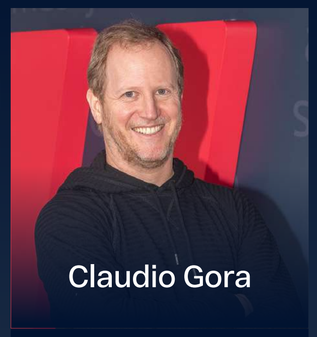
Gender
Man

Executive or non-executive function
Vice-Chairman of the Board of Directors.

Independence
No.

Mandate
Until the 2027 ASM

Number of other functions and commitments, as well as the nature of those commitments
(4) Vice-Chairman of the Board of Directors; Member of the ESG Committee; Member of the Information Security Committee and; Member of the HR Committee.



Claudio Gora

Gender
Man

Executive or non-executive function
Full member of the Board of Directors.

Independence
No.

Mandate
Until the 2027 ASM

Number of other functions and commitments, as well as the nature of those commitments
Full member of the Board of Directors.



Andrea Gora Cohen

Gender
Woman

Executive or non-executive function
Full member of the Board of Directors.

Independence
No.

Mandate
Until the 2027 ASM

Number of other functions and commitments, as well as the nature of those commitments
Full member of the Board of Directors.



Fernando Biancardi Cirne

Gender
Man

Executive or non-executive function
Full member of the Board of Directors

Independence
No.

Mandate
Until the 2027 ASM

Number of other functions and commitments, as well as the nature of those commitments
(3) Full Member of the Board of Directors; Member of the ESG Committee; Member of the Human Resources Committee.



Flávio Benício Jansen Ferreira

Gender
Man

Executive or non-executive function
Independent member of the Board of Directors.

Independence
Yes.

Mandate
Until the 2027 ASM

Number of other functions and commitments, as well as the nature of those commitments
(4) Independent Member of the Board of Directors; Member of the ESG Committee; Member of the Audit Committee; Member of the Human Resources Committee.



Camilo Cabianca Ramos

Gender
Man

Executive or non-executive function
Independent member of the Board of Directors

Independence
Yes.

Mandate
Until the 2027 ASM

Number of other functions and commitments, as well as the nature of those commitments
Independent member of the Board of Directors



Luiz Otavio Ribeiro

Gender
Man

Executive or non-executive function
Independent member of the Board of Directors

Independence
Yes.

Mandate
Until the 2027 ASM

Number of other functions and commitments, as well as the nature of those commitments
Independent member of the Board of Directors.

The organization discloses the roles and responsibilities of each Board Member in reference form, the nomination policy requires members to properly assume the responsibilities of their positions, considering their commitment to the company's values.

To support the execution of its responsibilities, including internal control monitoring and risk management, the Board of Directors relies on the support of five non-statutory advisory committees, which will be described later: ESG Committee; Human Resources Committee; Audit Committee; Ethics and Conduct Committee; and Information Security Committee.

Since 2007, the Board of Directors' decisions have been made by consensus, demonstrating respect and open dialogue on the part of both the controlling shareholders and the independent shareholders.

The Chairman of the Board of Directors is one of the controlling shareholders of LWSA, therefore a non-independent chairman, without an independent lead director, and does not hold any other position in the Company. In his absence or temporary incapacity, his duties are performed by the Vice-Chairman. In situations where the Vice-Chairman is absent or incapacitated, his duties will be assigned to one of the members of the Board of Directors, to be indicated by the Chairman.

In accordance with best corporate governance practices and our Code of Ethics, LWSA adopts a separation between the roles of Chairman of the Board and Chief Executive Officer (CEO).

Currently, the positions of Chairman of the Board and CEO are held by distinct individuals. This distinction aims to ensure the independence of the supervisory body from executive management, guaranteeing that strategic decisions and oversight of the board occur without conflicts of interest and with complete transparency towards our stakeholders.

The Board of Directors is composed of members with impeccable reputations and relevant professional, technical, and academic experience. Individual competencies encompass the Company's material areas, and the specific technical knowledge of each team member is essential for sectoral governance positions. This high-quality composition is a differentiator, adding value both in risk management and in identifying opportunities.

No member of the Board of Directors holds a position on the executive board. In addition to serving as directors, they also serve on advisory committees.



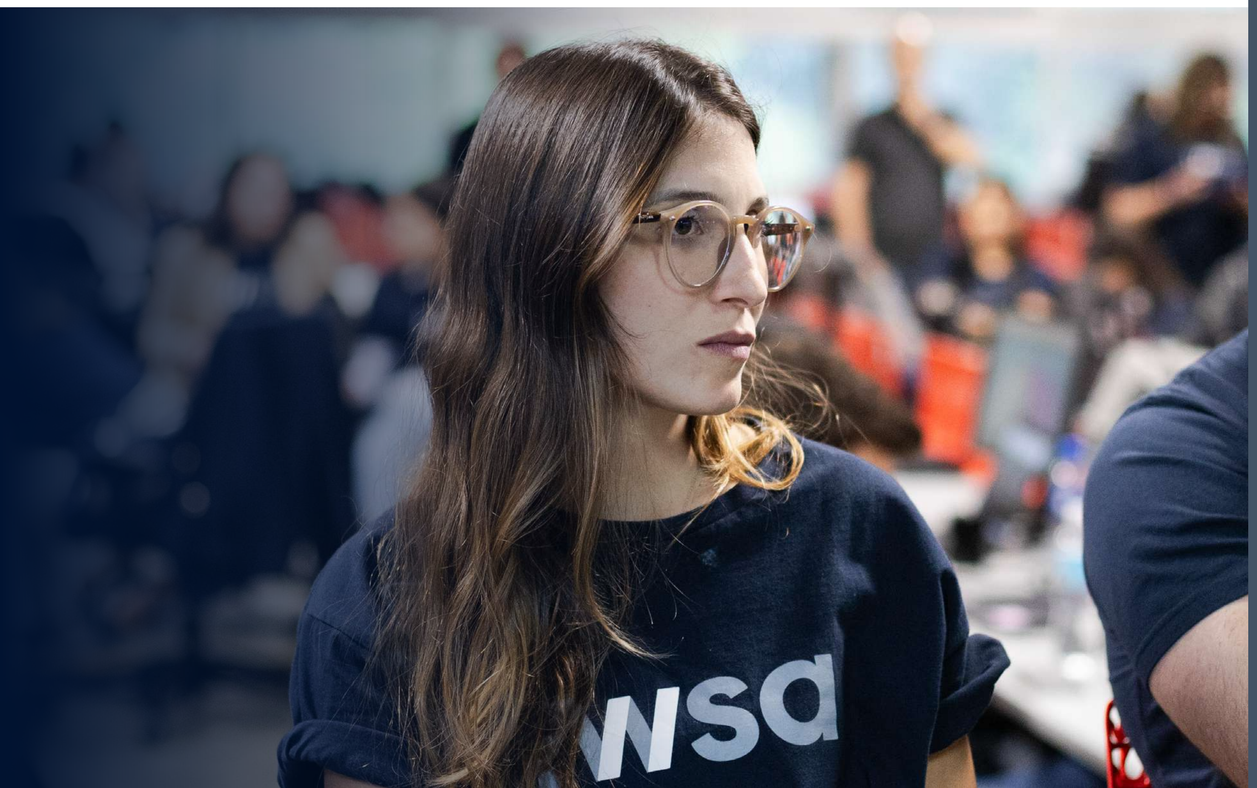
Appointment and selection

GRI 2-9, 2-10, 2-11, 2-12, 2-13, 2-16, 2-17

The Company's longevity and integrity are intrinsically linked to the quality of its governance. Therefore, the nomination and selection process for our Board of Directors is conducted with technical and ethical rigor, aiming to ensure a diverse, independent body fully aligned with our long-term goals.

We believe that leadership should reflect our values. Therefore, candidates for the Board are evaluated based on parameters that go beyond technical expertise, including:

- Engagement and commitment to the Company's values and culture;
- Commitment to the terms set forth in the Code of Ethics and Conduct, as well as in other codes, policies and regulations applicable to them;
- To properly assume the role and responsibilities arising from their position.



Skills Diversity and Governance

To meet the challenges of a constantly transforming market, we seek a multidisciplinary board. Our competency matrix prioritizes a balance of expertise in:

- Best practices in Corporate Governance;
- Corporate Law and Regulation;
- Risk Management and Compliance;
- Sector expertise and strategic business vision.

Independence and Protection for Shareholders

In line with the best practices of the Novo Mercado (New Market), we guarantee impartiality in strategic decisions through a robust composition of independent members. Currently, we exceed the minimum required level: we have 37.5% of the Board of Directors members being independent (3 members out of a total of 8).

Criteria and Rigor in Independence

According to the New Market Regulations, at least 2 members or 20% of the Board (whichever is greater) must be independent, with this characterization determined at a General Meeting. We also consider independently the directors elected through the powers provided for in the Corporations Law (Article 141, §§ 4 and 5).

To ensure impartiality, those who meet the following criteria cannot be elected as independents:

- Being direct or indirect controlling shareholders;
- Having a binding vote, as stipulated in a shareholders' agreement, on matters concerning the Company;
- Being a spouse or relative up to the 2nd degree of consanguinity of the controller or administrators;
- Having been an employee or director of the Company or its controlling entity in the last 3 years.

Furthermore, we conducted a qualitative analysis of the magnitude of relationships that may imply a loss of independence, evaluating:

- Relationship by affinity up to the 2nd degree with controllers or administrators;
- Recent professional ties in affiliated companies or companies under common control;
- Direct business relationships or holding a decision-making position in partner organizations;
- Receipt of other remuneration (besides the position on the Board of Directors or committees), except dividends or pension benefits.

Additionally, the Company adheres to the practices of the B3's Novo Mercado (New Market), strictly complies with CVM (Brazilian Securities and Exchange Commission) regulations, and constantly seeks alignment with best market practices, being included in important benchmark indices of the Brazilian stock exchange.

Structure and Dynamics of the Collegiate Body

- Composition: Between 5 and 8 members, with a unified term of 2 years.
- Leadership: The Board of Directors has a President and a Vice-President, ensuring continuity of management even in cases of temporary impediments.
- Continuous Evaluation: The reelection proposal is not automatic; it is based on a careful analysis of individual performance, attendance, and strategic contribution during the previous term.

Transparent Nomination Process

We promote the active participation of shareholders by establishing clear procedures for nominating candidates:

- Validation:The Board of Directors validates the independence of the individuals nominated in the Administration's Proposal beforehand.
- Accessibility:Nominations made up to 25 days prior to the Assembly are included in the Remote Voting Bulletin (BVD).
- Right of Nomination Based on Relevance:Shareholders with more than 10% of the shares may nominate one member to the Board of Directors.
- Disclosure:Even nominations submitted after the BVD deadline are communicated to the market or at the Assembly itself.

Evaluation of the Board of Directors' Performance

GRI 2-18

The evaluation of the Board of Directors and Committees is carried out annually by the governing body and all directors, including independent directors, in accordance with the LWSA Bylaws.

The items evaluated are: attendance and diligence in the review and discussion of the topics covered; active contribution to the decision-making process; commitment to the performance of their duties, our values and objectives. The dissemination of the consolidated evaluation results follows this criterion:

- Individual results from board members are made available to the person in question and to the Chairman of the Board;
- The results of the Chairman of the Board and the CEO are also made available to all board members; and
- The results of each board member and the Chairman of the Board are discussed in individual feedback sessions.

Within the management team, we utilize the Succession Pipeline, an evaluation model built upon the 9-box grid, which considers performance data and potential for more complex challenges. This process aims to guarantee the continuity and sustainability of the business, since, through the mapping of successors, the company can count on leaders prepared to assume strategic positions in unexpected or planned situations. This reduces operational risks, strengthens the organizational culture, and promotes long-term sustainability, positioning us to face market changes and challenges with agility and efficiency.

For measures taken in response to evaluations, including changes to the composition of the highest governing body and organizational practices, the Chairman of the Board provides feedback to determine the next steps.





Eligible positions

LWSA does not have a Nomination Committee. However, we have a Policy for the Nomination of Members of the Board of Directors, Statutory Executive Board, and Members of the Advisory Committees, duly approved by the Board of Directors, applicable to our Company and our subsidiaries, which aims to establish the guidelines, criteria, and procedures for nominating members to fill eligible positions, in accordance with best corporate governance practices.

All nominations for Eligible Positions must comply with the provisions of this Member Nomination Policy, the Bylaws, the Code of Ethics, the New Market Regulations, as well as applicable current legislation and regulations.

As a general guideline, the nomination of candidates to fill Eligible Positions should be based on an analysis of the needs of the Board of Directors, Statutory Executive Board, and Advisory Committees, as applicable, ensuring a composition of members with diverse profiles, taking into account experience, skills, conduct, background, age range, and gender.

Candidates for Eligible Positions must be highly qualified professionals with relevant professional, technical, and academic experience, and an unblemished reputation. The nomination of members for Eligible Positions will be subject to integrity criteria (integrity background check).

In the selection process, candidates will be sought who possess knowledge and experience in the business sectors in which the Company and its Subsidiaries operate or may operate.

Impact Management

GRI 2-12; GRI 2-16

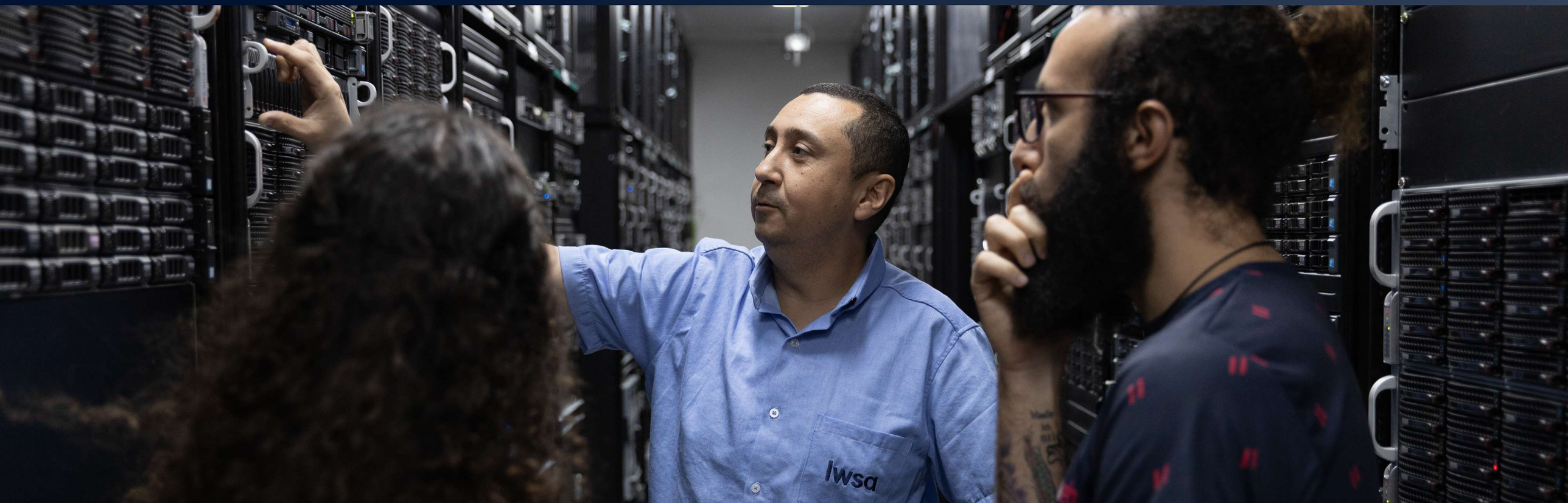
Among its various responsibilities, the Board of Directors is responsible for overseeing and guiding due diligence and other relevant processes to identify, assess, and manage risks and opportunities, which includes:

- Approve internal regulations;
- To oversee due diligence;
- Manage risks;
- Communicate and ensure transparency in the disclosure of reports to the market;
- Engage stakeholders;
- Evaluate the organization's performance;
- Develop skills.

LWSA's integrity process begins with the Whistleblowing Channel operated by Aliant, which performs the initial screening and forwarding of reports, ensuring impartiality and the absence of conflicts of interest from the outset. The reports are then directed to the Compliance area and the Ethics Committee, bodies responsible for investigating, deliberating on misconduct, and applying disciplinary measures.

This flow is reported to the Audit Committee, which fulfills its supervisory role by informing the Board of Directors about the Company's ethical landscape through its periodic reports. In this way, the Board acts as the highest governance body, approving guidelines and monitoring the progress of compliance issues reported by the advisory committees.

In 2025, 53 statements of crucial concerns were presented to the Board of Directors. It is noteworthy that all reports concerned behavioral issues, maintaining the historical record of zero occurrences of fraud and corruption on the part of senior management. The increase in the volume of reports is interpreted as a sign of employee confidence in the listening and investigation mechanisms.



Dissemination of ESG best practices

GRI 2-12

We seek to integrate good ESG practices into our business agenda and at all levels of the Company, and the Board of Directors has been an important player in defining strategic guidelines and validating our work plan.

We consider the search for renewable energy sources, the maintenance of best governance practices, the training of a specialized workforce, and the promotion of the development of Brazilian micro and small businesses through technology to be strategic. The Board plays a fundamental role in building the ESG, sustainability, and risk management strategy. This is an active agenda that involves the work of many people.

We work to promote values such as diversity and the development of a more welcoming and inclusive environment. We conduct training sessions on the Sustainability Report, open to the entire organization, aiming to share the results obtained and raise awareness about ESG advancements. Our success and intangible value are achieved through the work and dedication of highly skilled professionals, who guarantee our company's competitive edge.

> In 2025, we underwent our cultural evolution, a strategic move to strengthen the synergy of the entire ecosystem. This process gave rise to the positioning 'The Best of Us', which represents our unified culture connected to the company's strategy.

Its formation was the result of a process of diagnosis and joint construction, which translated values and behaviors into shared guidelines. In this scenario, our leadership acts as a protagonist and guardian of this evolution, ensuring that our values are lived in practice. They are: We exist for the customer; We play together; We take responsibility; We focus on what really matters; We seek consistent and lasting results; We are honest in our relationships; We question, learn and evolve.

With this foundation established, the focus is on daily execution and strengthening, ensuring that the customer is at the center of all decisions. Thus, we unite culture and strategy to achieve our purpose: we transform businesses to grow and prosper through technology.



Fiscal Council

The Company's Fiscal Council, an independent oversight body for administrators and reporting to shareholders, is a non-permanent body. Its last composition had a term that ended in April 2023, and it was not installed for the fiscal year ending December 31, 2025.

The Company's Fiscal Council must be established by vote at the Ordinary General Meeting, with a minimum of 2% of the votes in favor of its establishment. As this percentage was not reached at the Meeting, the Company's Fiscal Council was not established for the period.

Advisory Committees

At LWSA, we have five non-statutory advisory committees:



Ethics and Conduct Committee

GRI 2-9

The Ethics and Conduct Committee was created with the objective of being an advisory, investigative, and educational body regarding acceptable conduct within the Company.

The representative and multi-sectoral working group is currently composed of three members, who meet as needed, and includes the participation of company directors. Its members are elected by the Board of Directors for a unified two-year term, with reelection permitted.

Name	Gender	Executive or non-executive function	Independence
André Kinjo Kubota	Man	Committee Member	No
Otavio Dantas de Carvalho	Man	Committee Member	No
Frederico Seabra de Carvalho	Man	Independent Member of the Committee	Yes

Note: According to the board meeting held in May 2026.



Human Resources Committee

GRI 2-9

The Human Resources Committee is composed of 5 members, currently including Directors and members of the Company's Board of Directors, with 1 independent member. Meeting monthly, this is a working group that constantly seeks to improve the efficiency of human resources mechanisms, people management and development, talent attraction and retention, and company compensation

We do not have an independent Compensation Committee in our structure. Among other responsibilities, the Human Resources Committee is responsible for assisting in the discussion and development of the Company's compensation guidelines.

Name	Gender	Executive or non-executive function	Independence
Gilberto Mautner	Man	Committee Member	No
Fernando Biancardi Cirne	Man	Committee Member	No
Ricardo Gora	Man	Committee Member	No
Flavio Benício Jansen Ferreira	Man	Committee Member	Yes
Otavio Dantas de Carvalho	Man	Coordinator of the Human Resources Committee	No

ESG Committee

GRI 2-9

The ESG Committee plays a strategic role in discussions and actions related to ESG guidelines at LWSA and is composed of six members, currently including directors and members of the Board of Directors.

It meets monthly, along with the Company's HR Committee, but with different agendas and practically the same members.

In 2025, the Committee played an active and strategic role. It oversaw the construction of the Materiality Matrix, assisting in the prioritization of topics, and was decisive in defining the diversity indicators to be pursued by the Company, such as the targets for women in leadership and the inclusion of people with disabilities, in addition to monitoring LWSA's rating in sustainability indices.

Name	Gender	Executive or non-executive function	Independence
Gilberto Mautner	Man	Committee Member	No
Fernando Biancardi Cirne	Man	Committee Member	No
Ricardo Gora	Man	Committee Member	No
Flavio Benício Jansen Ferreira	Man	Committee Member	Yes
Otavio Dantas de Carvalho	Man	Coordinator of the ESG Committee	No
Henrique Bastos Marquezi Filho	Man	Committee Member	No

Audit Committee

GRI 2-9

The Audit Committee's responsibilities include: continuously and systematically supervising risk identification procedures and LWSA's internal control systems; monitoring the quality and integrity of financial reports; ensuring compliance with legal, statutory, and regulatory standards; and overseeing the activities of independent auditors.

In accordance with the New Market Regulations, the Audit Committee has specific internal regulations that detail its functions and operational procedures. It is linked to the Board of Directors, but has operational autonomy and its own budget, approved by the Board, to cover operating expenses.

According to the Internal Regulations of the Audit Committee, duly approved by the Company's Board of Directors, this committee will be composed of at least 3 members appointed by the Board, with at least one of them being an independent director and one having recognized experience in corporate accounting matters.

In accordance with the established rules, the Company's Audit Committee has 3 (three) members, currently including one member of the Company's Board of Directors, in addition to two independent external directors, elected for a unified two-year term, and eligible for re-election.

Name	Gender	Executive or non-executive function	Independence
Carlos Elder Maciel de Aquino	Man	Coordinator of the Audit Committee	Yes
Camilo Cabianca Ramos	Man	Member of the Audit Committee	Yes
Fernando Dal-Ri Murcia	Man	Member of the Audit Committee	Yes

Note: According to the board meeting held in May 2026.



Information Security Committee

GRI 2-9

The Information Security Committee implements ongoing actions to ensure compliance and effective operation of processes related to Technology and Information Security areas.
It meets quarterly and is composed of four Members elected by the Board for a unified term of up to two years, with reelection permitted. Currently, it includes directors and members of the Board of Directors, as well as the main technical leaders of LWSA.

This committee is responsible for discussing and proposing projects, initiatives, and demands related to risk management regarding technological threats and information security. It should also analyze procedures to ensure compliance with laws, internal regulations, policies, and procedures applicable to information security. It manages internal policies and standards aimed at standardizing existing procedures and guidelines in different areas to avoid technological risks and safeguard information security. It also promotes the structure of internal controls that allow for an understanding of the main risks arising from internal and external factors, to ensure that they are efficiently identified, assessed, monitored, controlled, and tested. It is also responsible for maintaining internal control systems and routines aligned with best market practices, as well as periodic reviews and updates so that any deficiencies are promptly and fully corrected.

Name	Gender	Executive or non-executive function	Independence
Rafael Abdo	Man	Coordinator of the Information Security Committee	No
Gilberto Mautner	Man	Committee Member	No
Gustavo Gomes Salviano	Man	Committee Member	No
Higor de Araújo Franco	Man	Committee Member	No



Executive Board

The Executive Board shall consist of a minimum of 5 (five) and a maximum of 12 (twelve) members, shareholders or not, domestic residents, elected by the Board of Directors, with the accumulation of more than one position by any Director being authorized.

Our Executive Board currently consists of 1 Chief Executive Officer; 4 Business Unit Directors; 1 Chief Financial Officer and Investor Relations Officer (positions held concurrently, as per the Articles of Association); 1 Director of People and Corporate Management; and 1 Director of Technology.

The term of office for members of the Executive Board will be unified at 02 (two) years, and they may be re-elected and remain in office until the election and appointment of their successors. The Executive Board meets whenever the company's business requires it, and is not considered a collegial body.

The Board of Directors shall appoint professionals to the Statutory Executive Board who possess the ability to harmonize the interests of the Company, shareholders, managers, and employees, based on legality and ethics.



Candidates for membership on the Company's Executive Board must meet the following criteria:

- Engagement and commitment to the Company's values and culture;
- Commitment to the terms set forth in the Code of Ethics, as well as in other codes, policies and regulations applicable to them;
- To adequately assume the role and responsibilities arising from the position; and
- Skills to implement the strategies and achieve the Company's objectives.

The positions of Chairman of the Board and Chief Executive Officer or principal executive cannot be held by the same person.

Procedure for Nomination

The Chief Executive Officer must be capable of leading the management of the Company's business, observing risk limitations and guidelines defined by the Board of Directors. The proposal for the re-election of Board members should take into account their performance during the term, as well as the need for adjustments in the Board's composition, aiming to achieve the Company's objectives. In February 2025, the CEO of LWSA was appointed.

Senior management compensation

GRI 2-19, 2-20

The Company has a Compensation Policy duly approved by the Board of Directors. This regulatory instrument aims to establish rules and guidelines for job and salary management, to have criteria for transfers, to define responsibilities, procedures and internal deadlines to ensure internal equity, salary fairness, attractiveness, maintenance and retention of talent.

This applies to members of the Board of Directors, statutory and non-statutory directors, members of the Fiscal Council (if established) and the Audit Committee, and other advisory committees, whether statutory or non-statutory.

There are no external or independent consultants involved in determining the company's compensation.The studies and panels are defined by the Compensation team and validated with the Director of People, Culture & ESG. Stakeholder considerations (including shareholders) related to the topic are discussed in meetings and recorded in minutes.

In the event of termination, payments are governed by current labor laws. Variable compensation, whether short-term or long-term, is paid according to rules of proportionality and the type of termination. All executives under CLT (Consolidation of Labor Laws) or statutory regimes are subject to social security legislation.

The policy seeks to align the interests of managers with those of shareholders, focusing on business sustainability and talent retention, and is composed of the following components:

- **Fixed remuneration:** Monthly amount paid in cash, determined based on the position, skills, and market value;
- **Variable compensation:** Bonuses or awards tied to meeting short-term annual targets;
- **Profit sharing:** Portion of variable compensation directly linked to the company's financial results;
- **Benefits:** A set of direct or indirect compensations designed to ensure well-being and competitiveness in the market;
- **Benefits resulting from leaving the position:** as per eligibility and when applicable;
- **Compensation based on or referenced to shares:** Long-term incentives (LTIs), such as stock options or restricted stock.

The overall remuneration of LWSA's Directors shall be determined by a General Meeting, with the Board of Directors setting the monthly remuneration for its members and the members of the Executive Board.

With regard to compensation policies applied to members of the highest governing body and senior executives, including attraction bonuses or recruitment incentive payments, the Hiring Bonus is applied only to executive hiring. Negotiation occurs on a case-by-case basis, depending on the candidate's specific challenges. The available budget and potential financial return are also evaluated.

We do not have a practice of returning bonuses already received. We maintain the payment granted, as established in the Incentive Policy, which may be short- and long-term variable compensation and/or various service incentives. According to agreements defined individually between executives on the board, payment may be proportional or may not occur at all, depending on each case.

With regard to retirement benefits, we do not have a separate (private) retirement plan. All employees with CLT (Consolidation of Labor Laws) or statutory contracts are subject to the current social security system and legislation.

Total annual compensation

GRI 2-21, 2-4

	2023 [7]	2024	2025 [7]
Ratio between the highest individual remuneration and the median of individual remunerations [1] [2] [3]	53.53[8]	51.30[8]	35.04
Ratio between the percentage change in the highest individual remuneration and the percentage change in the median of individual remunerations[4] [5]	1.34	1.80	-2.57[9]

[1] Individual compensation is the sum of all components of total annual compensation per person, including salaries, variable compensation, bonuses, commissions, profit-sharing programs, and stock option programs.
[2] Median is the 50th percentile of the data set - individual salaries - salaries.
[3] Rationale for the calculation: highest individual remuneration divided by the average of individual remunerations.
[4] The percentage change is obtained by the ratio of individual remuneration between one year and the immediately preceding year. Applicable to the highest individual remuneration and the median of individual remunerations.
[5] Rationale for the calculation: ratio of the percentage change in the highest individual remuneration divided by the ratio of the percentage change in the median of the individual remunerations.
[7] The Company underwent structural changes resulting from M&A and acquisitions between 2023 and 2025.
[8] As part of our commitment to transparency and continuous improvement in reporting, we have updated the historical series of compensation indicators. The figures for fiscal year 2024 that were published in the previous edition have been revised to reflect the consolidated database for the period, which actually refers to the year 2023. That said, the data has changed: the ratio between the highest compensation and the organization's median compensation went from 51.30 (revised 2024) to 35.04 (2025), a movement driven by structural adjustments in senior leadership and the continuous appreciation of the workforce, which recorded a 9.7% increase in median compensation.
9 In the 2025 fiscal year, we observed a significant improvement in salary equity indicators. The annual change rate showed an index of -2.57, reflecting a combined trend: a structural reduction of 25.04% in the remuneration of senior management and the strengthening of the policy to value the general workforce, which achieved a median increase of 9.73%. This positive reversal in the indicator reinforces the organization's commitment to reducing disparities and redistributing value more equitably across functional levels.

Compensation Committee

LWSA does not have an Independent Compensation Committee in its structure. However, the Company has a Human Resources Committee, responsible, among other duties, for assisting in the discussion and development of the Company's compensation guidelines. The Human Resources Committee currently has 5 members, including 1 Independent Director.

The General Meeting, the Board of Directors, and the Human Resources Committee of the Company participate in the decision-making process regarding remuneration. The overall remuneration of the Directors is determined by the General Meeting, with the Board of Directors responsible for setting the monthly remuneration of its members and the members of the Company's Executive Board, as well as the members of the Audit Committee and other advisory committees.

Furthermore, the Board of Directors must determine the overall compensation of the members of the management of companies directly or indirectly controlled by the Company, and such compensation must also be approved at a General Meeting or Shareholders' Meeting. It is also the responsibility of our Board of Directors, in conjunction with the Human Resources Committee, to determine the allocation of each part of the compensation, including:

- Fixed compensation;
- Variable compensation;
- Profit sharing;
- Benefits;
- Benefits resulting from termination of employment; and
- Stock-based or share-referenced compensation, as well as to establish the compensation for advisory committee members.

Executive Selection

The executive selection process seeks candidates with knowledge and experience in the relevant sectors. Nominees must be highly qualified professionals with relevant experience (professional, technical, and academic) and an unblemished reputation, with integrity criteria (background check) being considered during the nomination process.

Executive hiring with attraction bonuses or recruitment incentive payments is negotiated on a case-by-case basis, based on an assessment of the available budget and the potential financial return. The incentive policy may involve short/long-term variable compensation and/or various service incentives. It may be proportional or based on agreements defined individually between the executives on the Executive Board.

Diversity in senior leadership

GRI 405-1

At LWSA, 39.8% of leadership positions are held by women, which contributes to a more balanced average salary. Currently, our Statutory Executive Board does not include any women.

Regarding diversity, there are still no specific criteria established for the election of members of the Board of Directors.

Percentage of individuals who are members of governing bodies, by gender.

Gender	2024	%	2025	%
Men	6	75.0	7	87.50
Women	2	25.0	1	12.50
Total	8	100.0	8	100.0

Percentage of individuals who are members of governing bodies, by age group.

Age range	2024	%	2025	%
Under 30 years old	0	0,0	0	0.0
From 30 to 50 years old	2	25.0	3	37.5
Over 50 years old	6	75.0	5	62.5
Total	8	100.0	8	100.0

Ethics and integrity

GRI 3-3 Material topic: Corporate governance and compliance
GRI 2-15, 2-23, 2-24, 2-25, 2-26, 2-27, 205-2, 205-3

LWSA integrates its commitments to responsible business conduct into its organizational strategies, policies, and operational procedures through the review and unification of processes, following the consolidation of its ecosystem. In 2025, the Company reviewed and updated all its internal policies and regulations to ensure synergy and clear guidelines to be followed by employees and third parties, applicable to all business units.

These documents apply to all LWSA companies and guide our actions, which are structured on non-negotiable pillars of political commitments to guarantee and protect human rights, respect for freedom of association, the rights of children and adolescents, diversity, the fight against corruption, and any form of discrimination and prejudice. We are committed to maintaining full social responsibility in our policies, including in our business units.

These commitments are based on:

- In the Universal Declaration of Human Rights: Adopted by the United Nations General Assembly in 1948, this declaration establishes the fundamental and universal rights of all human beings, including civil, political, economic, social, and cultural rights.

- The UN Global Compact: which we have been a signatory to since December 2021, is a UN initiative that engages companies in adopting universal principles in areas such as human rights, labor, environment and the fight against corruption.

Therefore, we are committed to integrating universal principles in areas such as human rights, labor, the environment, and the fight against corruption into our strategies and operations, to promote responsible and sustainable business practices.

Our culture reinforces these commitments through clear rules of coexistence and management. We have established that **we assume responsibility**. This means facing challenges with seriousness and transparency, without assigning blame, but with a total focus on resolution. We adopt the concept of accountability as a standard: taking responsibility for actions and results, ensuring accountability and integrity in all interactions. Furthermore, we foster an environment of psychological safety, where 'everyone has a voice' and respectful disagreement is encouraged for the evolution of the business.

To ensure that policy commitments to responsible business conduct are incorporated into all business activities and relationships, LWSA structures the implementation of its ethical commitments across the board, starting with Senior Management and permeating all hierarchical levels.



The Board of Directors holds ultimate responsibility, overseeing due diligence and managing risks. Below it, the Ethics and Conduct Committee acts as an advisory and investigative body, while the management and the Internal Controls and Compliance area foster an ethical culture at all levels, assisting departments in identifying and monitoring risks. Additionally, all employees are considered responsible for managing and reducing risks in their respective activities.

To implement and consolidate these commitments with and through its business relationships, LWSA extends its ethical standards throughout its value chain. Implementation in business relationships is ensured through due diligence processes, where we conduct rigorous supplier and partner vetting, as well as onboarding new clients, assessing reputational risks, labor rights practices, and environmental compliance.

This practice is also ensured through our contracts, which include standard clauses with strict obligations regarding the fight against bribery, forced and child labor, and data protection; and also by the Code of Ethics, which requires suppliers to formally adhere to the Company's principles of conduct, establishing the right to audit and termination in case of non-compliance.

Our policies, approved by the Board of Directors, are accessible to employees, customers, suppliers, and partners. They undergo periodic updates and, when necessary, benchmarks are conducted or third-party companies are hired to guide us in best practices.

Regarding the training provided for the implementation of these commitments, the Company maintains an ongoing corporate education program to ensure its effectiveness. All employees and assigned third parties undergo mandatory immersion in the Code of Ethics and Conduct, with Onboarding Training and Annual Refresher Cycles. Additionally, Anti-Money Laundering and Counter-Terrorism Financing and Weapons Proliferation training is specifically applied to employees in the financial services vertical. Furthermore, recurring communications are issued that translate complex policies into practical day-to-day guidelines, strengthening awareness of ethics, integrity, and human rights.

We have a Code of Ethics and Conduct (read more on the website https://-canalconfidencial.com.br/lwsa/).



LWSA has a Related Party Transactions and Conflicts of Interest Policy. This Policy aims to establish rules to ensure that:

- Decisions involving Related Party Transactions and situations with potential Conflicts of Interest must always be made with the interests of the Company and its Subsidiaries, as well as its Shareholders, in mind;

- Decisions that may confer a private benefit to any of its Directors and/or Employees, family members, entities or persons related to them, are taken in a transparent manner, with complete fairness, always respecting the best interests of the Company, observing the best Corporate Governance practices.

Furthermore, the Policy seeks to create behaviors and conduct that meet the requirements of current legislation, especially the duty of transparency, loyalty, and integrity of Administrators and Employees, requiring that the Company's interests always prevail over the personal interests of its decision-makers.

The managers file a conflict of interest declaration at the time of hiring, which is renewed annually. Thus, in the event of a Conflict of Interest situation, even a potential one, involving a Director or Employee of the Company, it is their responsibility to promptly report the situation to the Board of Directors and/or other Directors and/or the Ethics Committee, thereby becoming ineligible to proceed with and mediate the transaction in question.Cases identified as potentially risky are referred to a higher authority for decision-making or to the Ethics and Conduct Committee.

LWSA clearly communicates its shareholding structure. Conflicts of interest involving controlling shareholders are rigorously managed, especially in transactions with related parties. In these cases, we follow approval procedures that prioritize the Company's social interest, ensuring that such transactions occur under market conditions, as defined by current legislation and the Company's Policy.

We currently have two contracts with related parties in effect:

MG4 Participações Ltda. 1

- **Amount involved:** R$ 1,019,536.49
- **Existing balance:** R$ 61,525,765.70
- **Relationship:** MG4 Participações Ltda. is a company whose partners are Michel Gora, Ricardo Gora, Gilberto Mautner, Claudio Gora, and Andrea Gora Cohen, the current controlling shareholders of our Company, who together hold a stake corresponding to the entirety of the share capital of MG4 Participações Ltda.
- **Subject of the contract:** Lease of the property located in the City of São Paulo, State of São Paulo, at Rua Itapaiúna, nº 2.434, Vila Andrade, registered at the 11th Real Estate Registry Office of São Paulo, registration number 265.814. The amount of R$1,019,536.49 corresponds to the monthly rent amount stipulated in the contract (as renegotiated on September 1, 2015, according to clause 2.5.3 of the addendum), duly updated and adjusted by the IGPM. The amount shown in the “Existing Balance” field corresponds to the total amount due until the end of the contract term (in 10 years), brought to present value, calculated in accordance with IFRS 16/CPC 06(R2).

WW Marques Business Intermediation Ltda. 2

- **Amount involved:** R$ 89,794.32
- **Existing balance:** R$ 3,588,013.82
- **Relationship:** Willians Cristiano Marques, administrator of Tray Tecnologia em Ecommerce Ltda., a company controlled by the Company.
- **Object:** Lease of the property located in the city of Marília, State of São Paulo, at Avenida Alcides Lajes Magalhães, nº 130, Room 01, Jardim Acapulco neighborhood, registered at the 1st Real Estate Registry Office of Marília, registration numbers 11,544 and 11,545. In January 2022, a new property contract was signed by the subsidiary Tray Tecnologia with an increase in the occupied area. The value reported in the “Existing Balance” field corresponds to the total amount of payment due until the end of the contract term, brought to present value, calculated in accordance with IFRS 16/CPC 06(R2).

Executives, managers, and directors have a duty of diligence, reporting on their actions in a clear, concise, understandable, and timely manner, fully assuming the consequences of their acts and omissions.

All transactions with related parties are reported quarterly in our financial statements. The Related Party Transactions Policy establishes specific market criteria and approval levels. Transactions that exceed the materiality limits defined by the CVM (Brazilian Securities and Exchange Commission) are subject to immediate disclosure via Market Announcement or Material Fact Notice, detailing the nature of the relationship and the amounts involved.

Transparency is a fundamental pillar of LWSA. The Company communicates its conflicts of interest and relevant transactions to stakeholders through its Reference Form, the Explanatory Notes to the financial statements, and market announcements, ensuring that the external public has visibility into the integrity of our governance.

All of our policies have been approved by the highest level of the Organization, as available on our investor relations portal:

https://ri.locaweb.com.br/outras-informacoes/estatuto-politicas-e-regimentos/.

Audits on ethical standards

Adherence to ethical standards is monitored through multiple layers of auditing. The company has an Audit Committee that oversees internal control systems and compliance with legal and regulatory standards. Annual internal audits (currently conducted by Magalhães Andrade) are performed to ensure processes adhere to internal policies, and quarterly external audits focus on the integrity of financial reports and adherence to accounting standards. Operations are supported by ethical standards, such as the Code of Ethics and Conduct and the Internal Channel for investigating complaints of misconduct and/or non-compliance with internal policies.

Relationship with public authorities and regulatory bodies

GRI 2-28

Since 2024, one of the companies in our ecosystem, Pagcerto, has been authorized to operate as a Payment Institution by the Central Bank of Brazil, offering the Digital Account product. Once authorized, new regulatory requirements and obligations to the Regulator arose. Throughout the year, many processes were restructured, tools acquired, and new governance forums created.

We have a Risk Management, Compliance and Internal Controls area that centralizes governance and support for issues related to regulatory bodies, maintaining an independent position within the Company, ensuring the capture of applicable regulations, disseminating and ensuring their adherence, identifying risks, and monitoring any non-conformities until the risks are definitively mitigated. It is also responsible for reporting to executive and senior management forums.

As evidence of the strength of our governance and compliance, LWSA has completed four consecutive years without receiving any fines, warnings, or notifications from regulatory bodies such as the CVM and B3. We maintain strict adherence to the rules of the Novo Mercado and the Brazilian Corporations Law, ensuring transparency and fairness in the information provided to the market. Thus, we report that the total number of significant cases of non-compliance with laws and regulations during the reporting period was equal to zero (0), which directly reflects the total of zero (0) cases in which fines were applied.In this same context, we declare that the Company has not suffered any sanctions, warnings, or legal proceedings related to anti-competitive practices.

The Company does not have a significant stake in any associations or advocacy organizations.

Code of Ethics and Conduct

Our Company has a Code of Ethics and Conduct that serves as a guide for our stance on the most frequent issues, without claiming to encompass all the practices and principles of conduct and integrity that we expect. We expect relationships in the workplace to be based on honesty, respect, collaboration, and teamwork among all employees, regardless of hierarchical level.

The Code of Ethics and Conduct is available on the website: https://ri.locaweb.com.br/outras-informacoes/estatuto-politicas-e-regimentos/.

This document addresses the following topics: Principles, Conduct Commitments, Ethics Management and Whistleblowing, Commitment to ESG, Relationships, Information Security, Resource Utilization, and Asset Preservation.

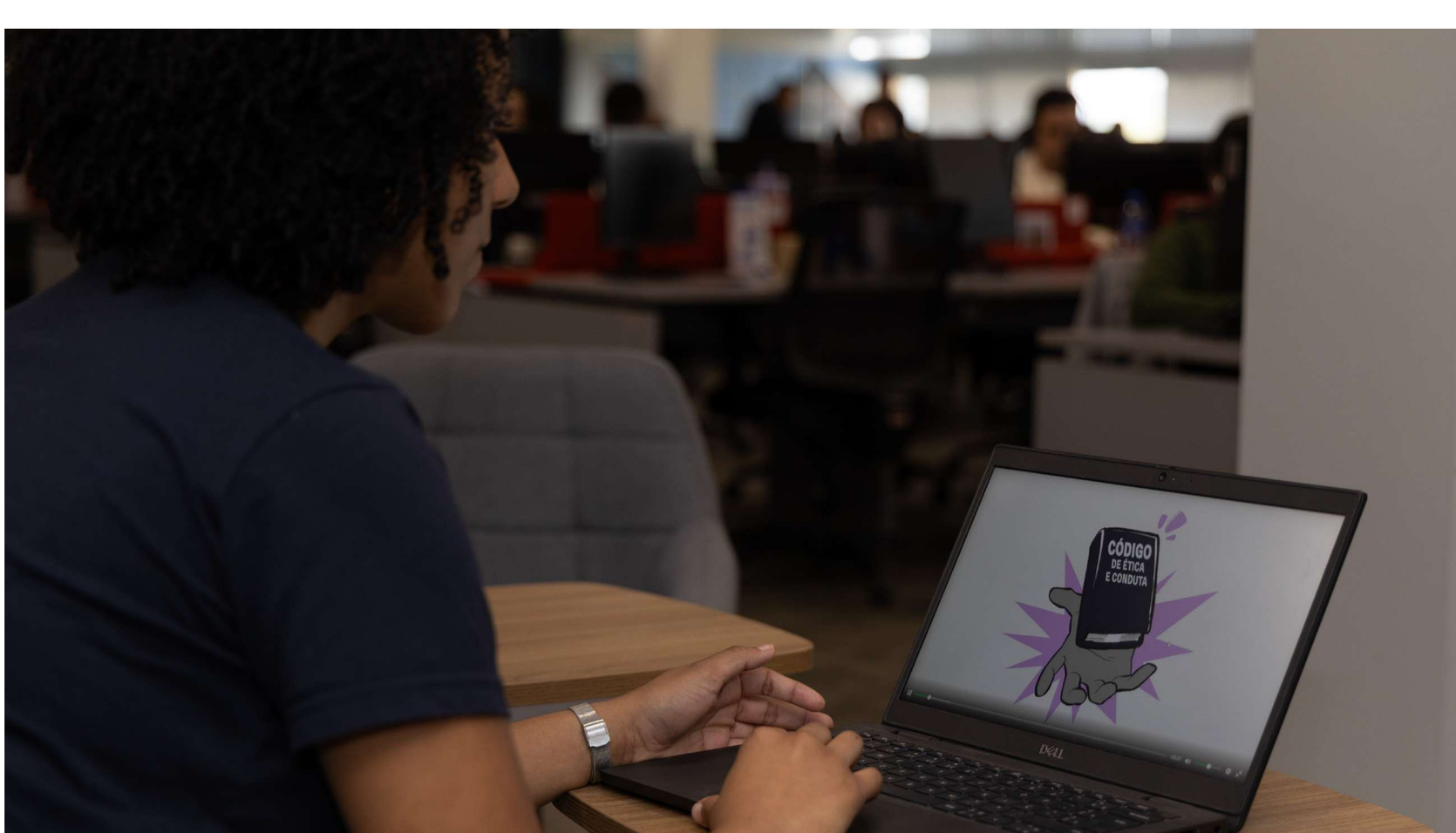
LWSA maintains an ongoing program of education and dissemination of ethical culture, through periodic training sessions with all employees to reinforce the Company's standards and principles.

The goal is to ensure that ethical skills are enhanced and that there are no doubts about the practical application of the Code. New employees are required to undergo an onboarding process regarding the pillars of Compliance, during which they receive a link containing access to the Code for reading and subsequent evaluation. Annual retraining is also mandatory to ensure the continuity of organizational values.

To ensure adherence to the Program, a minimum score of 80% is expected in this evaluation. Regarding accuracy in results, the employee's acceptance validation is required. For business partners of the units and suppliers, there is a standard clause accepting the group's Code of Ethics and Conduct in their contracts.

Regarding the mechanisms available for seeking ethical and legal advice, the main channels are through the Risk Management, Compliance and Internal Controls area, which centralizes governance and offers technical support on applicable standards and regulatory compliance, ensuring adherence to internal policies. In addition, it provides guidance on acceptable conduct and the correct application of the Code of Ethics and Conduct in the Company's daily operations.

LWSA does not tolerate any form of retaliation, disapproval, or discrimination against individuals who uphold the Code of Ethics and Conduct. Employees must report any violation or suspected violation of the Code to the Ethics and Conduct Committee.



Reporting channels

LWSA maintains an external and independent Confidential Channel, available to all its stakeholders. This mechanism is based on the guarantee of anonymity and absolute confidentiality, ensuring no retaliation against whistleblowers acting in good faith. All reports undergo screening and technical investigation, and are then sent to the Ethics Committee or, in cases involving senior management and accounting matters, escalated to the Audit Committee for independent oversight.

The channel is available by phone (0800 591 3128) and through the dedicated website

(http://canalconfidencial.com.br/lwsa/).

At LWSA, we follow this protocol for handling complaints:

1. Report to the Whistleblower Hotline;
2. External analysis of the complaint, classifying the impact of the report as "low, medium, or high";
3. Investigation by the Compliance area;
4. Establishment of the Ethics and Conduct Committee;
5. Analysis of the complaint and decision-making for possible consequence management.

All complaints are received and handled confidentially by Aliant and forwarded through a tool to the Compliance area, which conducts the investigation and analysis of the case. All cases are submitted to the Ethics Committee for discussion and, if inappropriate conduct is proven, the disciplinary measure is defined: informal or formal feedback, warning, or simple or justifiable dismissal, depending on the severity of the misconduct. The identification of the whistleblower is not mandatory. We do not tolerate retaliation, reprimands, or discrimination against individuals who uphold our Code of Conduct.

The Whistleblowing Channel is disclosed to employees upon hiring and during refresher training on the Code of Ethics and Conduct, which includes an evaluation, and is reinforced in I&D (Inclusion and Diversity) discussions, as well as in Compliance communications distributed throughout the Company. It is also mentioned in all contracts signed by LWSA.

Complaints regarding fraud, accounting or tax issues, or matters involving senior management are routed through a special handling channel involving the CEO and/or the the Board of Directors, depending on the accused's position within the Company. Such cases will be analyzed by the Audit Committee.

In 2025, 53 complaints were received, all of which were resolved in the same year. None of these complaints involved senior management or issues related to financial or accounting fraud.

Fiscal control and transparency

Our operations are characterized by rigorous control practices to ensure tax compliance and strict adherence to all tax obligations, whether principal or ancillary, in all operating jurisdictions. The accurate calculation and payment of taxes due are non-negotiable, reflecting our commitment to integrity and legality.

Our tax management is guided by industry best practices, based on periodic reviews of our tax positions and in-depth technical analyses. We strive for the faithful application of legal norms, maintaining constant fiscal transparency and providing complete and accurate information for efficient management.

All details regarding taxes paid by the Company are reported in our quarterly Financial Statements. Internally, our policies ensure that the conduct of each employee is in full alignment with ethical and legal principles.

We manage tax liabilities with a focus on the correct application of legislation, supported by specialized firms and under continuous monitoring by the Audit Committee, given the complexity of the Brazilian tax system. We maintain up-to-date internal control systems and routines, aligned with best market practices, and implement continuous actions to correct systemic deficiencies and ensure the operational effectiveness of processes.

Every year, we undergo an external and independent audit, which ensures the accuracy of the data in the accounting and financial statements, the precision of the tax risk management reports, and the appropriate accounting reflection.



Risk Management

GRI 205-2

The Risk Management, Compliance, and Internal Controls area was consolidated with the goal of applying a new Risk Management methodology to all LWSA companies.

Our structure and Internal Controls Policy establish fundamental concepts to guarantee the roles and responsibilities of the three lines of defense. We follow a model in which all employees are responsible for managing and reducing risks in their processes, acting as the 1st line; the Internal Controls area acts as the 2nd line; and Audit plays the role of the 3rd line of defense.

Our methodology is aligned with the framework of internal controls proposed by the Committee of Sponsoring Organizations of the Treadway Commission (COSO), considered a global model and reference. We have established an evaluation model based on components and principles with the objective of measuring the effectiveness of our controls. These metrics assess the identified risks considering the potential impact (financial, reputational or operational), its probability and the inherent risk versus the residual risk, which remains after the application of the controls.

Our risk management lifecycle consists of risk identification, assessment, measurement, mitigation, control, and, as part of ongoing management, risk monitoring and follow-up. This is achieved through control testing, indicator monitoring, and mapping of critical processes, according to a plan approved by the Company's Audit Committee, which also supervises the results of this work quarterly.

The Risk Management area is responsible for disseminating a preventative culture throughout all levels of the organization, starting with onboarding training for all new employees and extending to all company initiatives. These pillars reinforce our commitment to maintaining high standards of integrity and ethical values, as well as monitoring inherent risks, ensuring the security and sustainability of our business.

To achieve the objectives in risk management, four categories are considered:

- Strategic: general goals, aligned with its mission.
- Operations: effective and efficient use of resources.
- Communication: reliability of reports.
- Compliance: adherence to applicable laws and regulations.

The four components for achieving the objectives are:

- Internal environment: encompasses culture; its influence on risk awareness forms the basis for all other components of corporate risk management. It influences the design and operation of control activities, information and communication systems, as well as monitoring activities.
- Setting objectives: these are established at the strategic level, providing a basis for operational, communication, and compliance objectives. It is a prerequisite for event identification, risk assessment, and response.
- Event identification: these are incidents or occurrences originating from internal or external sources that affect the implementation of the strategy or the achievement of objectives.
- Risk assessment: involves a dynamic and interactive process to identify and evaluate the tolerance for risks that affect the achievement of the Organization's objectives.

Risk Assessment

The identified risks are classified using the risk matrix, according to their degree of relevance. For an effective analysis, it is important to consider at least the following risk dimensions:

- Liquidity: honoring financial obligations.
- Strategic: related to the organization's strategic guidelines.
- Operational: failures in processes, systems, or people
- Compliance: adherence to regulations and standards.
- Financial: financial impact on the company.
- Reputation: damage to the company's image.
- Information security: protection of data and information.
- Risk response: Responses include avoiding, reducing, sharing, or accepting risks.

When considering the response itself, management evaluates the effect on probability, impact, as well as costs and benefits.

- Control activities: actions that may be preventive or detective in nature and encompass a range of manual and automated activities, such as authorizations and approvals, verifications, reconciliations, and reviews of business performance;
- Information and communication: a continuous and interactive process of providing, sharing, and obtaining important and high-quality information from both internal and external sources to support the functioning of internal control; and
- Monitoring activities: utilizes continuous, independent assessments to ensure the presence and functioning of each of the five components of internal control.

The steps of the methodology represent the existing cycle in risk management and internal control, being:

- Identification: identify the risks inherent in the company's processes;
- Prioritization: assess the exposure to identified risks and prioritize action;
- Risk response: define responses to risks, according to the company's risk appetite;
- Monitoring: continuously monitor the control environment; and
- Report: keep directors informed about risks and the control environment.



Risk of corruption

GRI 205-2

The Integrity and Consequence Management Policy aims to strengthen ethical principles, support the whistleblowing channel, and define standards for consequence management.

The Policy on Preventing Money Laundering, Combating Terrorism and Proliferation of Weapons defines minimum requirements for each sector-specific program, such as Know Your Customer, Know Your Supplier, Know Your Partner, and Know Your Employee.

LWSA adopts a Zero Tolerance stance against any act of corruption or bribery, as detailed in its Corporate Anti-Corruption Policy developed for the year 2025. The policy extends to all companies in the ecosystem and business partners, and is in full compliance with the Anti-Corruption Law (Law No. 12.846/2013). Monitoring includes rigorous controls over donations, sponsorships, gifts, and hospitality. The company also applies the methodology Know Your Supplier (KYS) to monitor corruption practices in the supply chain and ensure legal compliance. These documents are available to all employees, business partners, and suppliers. We operate with active governance through the Audit and Risk Committee, which monitors compliance indicators, in addition to ongoing compliance training programs and preventive mapping of critical partners.

Regarding specific communication and training in anti-corruption policies and procedures, LWSA's 2025 strategy was primarily focused on rigorously meeting regulatory requirements. Training focused on employees in the financial vertical, in strict compliance with BACEN Circular No. 3,978/2020, which requires ongoing Anti-Money Laundering and Counter-Terrorism Financing programs for this group.

In this context, 849 internal employees (25.97% of the workforce) received specific communications on the topic, and 347 employees (10.61%) were formally trained. The quantitative breakdown of these training sessions can be found in the Appendices section of this report.



Litigation and redress of negative impacts

GRI 205-3

LWSA's legal team has administrative authority to address legitimate damages suffered by clients, thus avoiding unnecessary litigation.

All legal and extrajudicial claims, whether from clients or third parties, are continuously monitored, allowing for the identification of recurring causes, the implementation of system adjustments, changes to products and processes, and the remediation of any potential damage.

The involvement of stakeholders, who are the target users of complaint mechanisms, in the operation and improvement of these channels occurs through the judiciary and administrative bodies. Additionally, extrajudicial notifications are handled internally by sending an email to the legal department or opening a request (through reception or customer service) in the legal system (Benner).

Judicial and administrative proceedings are received, handled, and monitored by LWSA's in-house legal team, which is led by a specialized external firm. We reach agreements to repair damages and reduce processing times when we agree that this is the best course of action.

In all processes, an investigation of the events is carried out, and a technical analysis is performed to correct any errors. The most relevant processes of the Company are taken to the Executive Board, the Vice-Presidents and, eventually, to the CEO. Most processes are public.

To identify, understand, and address complaints made by our stakeholders, we monitor the following channels: Phone, Chat, WhatsApp, and tickets. Identification is done through volume tracking, monitored in real time, as well as through qualitative analysis of what is handled by our analysts.

The analysis is conducted through human-centered analysis (coordinators, quality and training teams), as well as through GenAI, with AI interpreting the service requests. The analysis includes: the content of the service requests, satisfaction surveys, and all material generated by our Quality team, with the goal of promoting continuous improvement.

For proper handling and resolution of complaints, requests are handled by our Level 1 team. When not resolved, they are escalated to our Level 2 team. From Level 1 onwards, the analyst has an IT background/training and also receives internal training, from initial training to ongoing development and knowledge refresher courses.

The effectiveness of our customer service channels is measured by KPIs, where we combine internal data with customer satisfaction surveys measured across three pillars:

- Solution: evaluates the solution presented.
- Speed: assesses the time the customer waited to be served.
- Relationship: evaluates the attitude of the professional who assisted you.

The main methodology employed by our Customer Service team to promote continuous improvement is PDCA, an acronym that defines the management process based on the following actions: Plan, Do, Check, and Act.

LWSA did not register any confirmed cases of corruption involving employees or business partners in 2025. Additionally, we declare that the Company has not been involved in any corruption situation, nor does it have any ongoing public investigations, lawsuits, or closed cases related to this issue against the Organization or its employees.

Information Security

GRI 3-3 Material topic: Information security, data protection and privacy

We place great importance on information security. This is part of our business and our DNA, and it's a major differentiator from the competition. We constantly invest in processes and have a successful track record in this regard.

We have centralized a cybersecurity structure at LWSA, aiming to standardize measures and processes for increasingly effective defense of our technological environment against attacks and invasions. The initiative includes expanding the structure and team, aiming for rigorous monitoring of security elements. Our focus is on the robustness of the architecture and code, with specialists dedicated to preventing vulnerabilities and mitigating security risks. We operate on many fronts, with specialized professionals dedicated to information security.

> We have adopted strict protocols and invested in technologies to maintain our operations at the highest level of security, given that we are an organization targeted by hacker attacks due to our presence and the nature of the services we provide.

Among the security controls implemented, we highlight encryption and multi-factor authentication, perimeter security, and constant monitoring of our technology infrastructure. Furthermore, we are independently certified and audited annually in accordance with ISAE 3402 Type II standards, applied to the data center. This is an international standard seal that attests to the effectiveness of the data center's internal security controls and the quality of our internal processes, ensuring compliance with the highest international information security standards.

Internal controls also ensure the availability of all critical and essential services for the continuity of our operations. We recognize that technological disruptions have the potential to affect the delivery of our services, varying according to the criticality of the affected asset. Among the main mapped risks that can compromise business continuity are: cyberattacks, critical infrastructure failures, human configuration errors, and supply chain failures. To address these scenarios, we have continuous monitoring: if any equipment fails, our observability team issues immediate alerts, mobilizing support teams to act and restore the environment as quickly as possible.

With a view to business continuity and systemic resilience, the Company adopts technological redundancy strategies to mitigate the impact of potential disruptions. The infrastructure is designed to ensure that critical components operate with high availability, minimizing the effects of isolated failures and guaranteeing operational stability.

In addition to advanced endpoint monitoring to identify and block malicious actions, our infrastructure teams perform decentralized and periodic backups of all environments and products. In parallel, protection against data loss and traceability of the entire development process are ensured by the strict code versioning control adopted by the engineering teams. Additionally, we conduct periodic system tests to ensure and guarantee recovery processes.

Our products, services, and business relationships that underpin our technological operations are developed in alignment with customer needs, taking into account and integrating robust security measures.

We have a dedicated team that assesses the security of each potential SaaS provider before they are hired. These analyses are developed and designed to ensure that all our partnerships align with high ethical, privacy, and security standards. Clauses in our commercial contracts require adherence to technical security and performance standards and requirements. Below is the security team structure:

- **Blue team:** defensive security, defining controls and monitoring vulnerabilities.
- **SOC:** security Monitoring Center, Continuous monitoring and incident response.
- **Red team:** Defensive security, attack simulations for control validation.
- **Security engineering:** implementing secure architectures and security automation.
- **AppSec (Application Security):** review of static and dynamic code.
- **Information Security Governance:** policy and compliance management, with a focus on emerging risks (MSCI: Risk Management).

Information security governance is structured around multidisciplinary committees, which are responsible for making strategic decisions aligned with recognized best practices, such as ISO 27001 and NIST.

The adoption of open standards, such as CIS Controls and OWASP, ensures system interoperability and compliance with regulatory requirements. Furthermore, we maintain formal channels for reporting concerns related to information security.

Identity management is an essential organizational process to ensure that employees have appropriate access to LWSA resources. This entire process is carried out by directly associating access rights with the functions performed in the employees' daily routines.

The access management process has controls that range from the request, authorization, provisioning, revocation, and, most importantly, periodic review of access to Company resources. We follow the principle of "need to know and need to do," meaning that users should only access the information and resources necessary to perform their job functions/activities. Furthermore, we maintain periodic internal audit processes where access and controls relevant to the company's business are evaluated.

LWSA adopts a security strategy based on a defense-in-depth model, combining access management, preventive maintenance, and continuous employee awareness with technical layers that protect everything from the network perimeter to applications and the final data. Reflecting this technological structure, we have a robust set of tools that ensures information security at all operational levels. We utilize EDR (Endpoint Detection and Response) for advanced threat monitoring on endpoints and MDM (Mobile Device Management) for centralized management of mobile devices, ensuring security and compliance policies. Data protection in cloud environments is reinforced with the implementation of CASB (Cloud Access Security Broker), while control against the leakage of sensitive data is achieved through DLP (Data Loss Prevention).

Access credentials are stored in password vaults with robust encryption, and web applications are protected against attacks (such as SQL injection and XSS) through a WAF (Web Application Firewall). The Zero Trust Network strategy is applied through microsegmentation, reducing the attack surface. Furthermore, application security is ensured through static (Sast) and dynamic (Dast) testing, guaranteeing early vulnerability detection.

Certifications and Audits:

- PCI DSS: compliance with card data security.
-
- ISAE 3402 (SOC Reports): Internal controls audit for the Data Center environment.
-
- MSCI: Data Security & Privacy - Assessment of exposure to cyber risks.
-
- SOC 2: Compliance with Security Controls.
-
- External and independent audits to validate security controls.



Tracking effectiveness and engagement

To assess the progress of its Information Security management, the Company's main goal is to maintain zero critical security incidents.

The effectiveness of the controls is measured through periodic audits based on the main market frameworks (ISO 27001, NIST, CIS Controls and OWASP), in addition to penetration tests (pentests) and periodic vulnerability scans. The lessons learned define ongoing action plans, with the entire process underpinned by stakeholder engagement through customer feedback, independent audits, and monthly deliberations by the Information Security Committee. Furthermore, we provide continuous digital security education for our employees to manage positive impacts.

Complementary programs and best practices:

- Multifactor Authentication (MFA).
- Continuous monitoring (SIEM/SOC).
- Backup and restore testing.
- Data encryption in transit and at rest.
- Bug Bounty Program: Rewards for ethically reported vulnerabilities.
- Vulnerability management: Prioritization and remediation based on frameworks (CVSS, SSVC).
- Privacy Incident Indicators.

Additionally, LWSA has a formalized internal corporate Incident Management policy and an information security incident response plan. This plan details threat scenarios, including the classification of incidents based on their severity, cause, and impact. Furthermore, it covers all phases of an incident's lifecycle, from initial identification and reporting to post-incident activities.

Internal information security audits are conducted periodically. These audits are carried out by a dedicated team that assesses the compliance of operations with our internal policies and established security standards. In addition, the Company undergoes an annual audit conducted by an independent firm, directly contributing to information security and compliance with external regulations.



Data Privacy

Data protection is treated with the same priority as information security. Our Privacy Policy is both informative and regulatory in nature, establishing the rules for data processing throughout the ecosystem. It is duly published on the LWSA website and includes the Data Processing Agreement, fully aligned with the General Data Protection Law (LGPD). The document details the practices for data collection, use, storage, and sharing, including robust encryption and access control measures.

In 2025, LWSA consolidated its governance through the Centralization of Privacy and Cookie Policies, ensuring that all business units and new acquisitions adhere to the guidelines published in https://lwsa.tech/politicas/. The scope covers the entire lifecycle of personal data and electronic identifiers, detailing with transparency:

Categories of Data Collected

Collection varies depending on the data subject's interaction with our business units:

- Registration and Demographic Data: Name, email, phone number, CPF/CNPJ (Brazilian tax ID), address, and billing information (essential for contract execution).
- Behavioral and Navigation Data: IP address, browser type, pages visited, time spent on the page, and interactions (collected via cookies to improve performance and user experience).
- Location Data: Approximate location derived from IP address.
- Candidate Data: Curriculum information and professional history for selection processes.

Legal Basis and Consent Management

Strictly adhering to the LGPD (Brazilian General Data Protection Law), we utilize different legal frameworks:

- Contract Execution and Legal Obligation: It serves as the basis for most registration and financial data, dispensing with the need for consent (Article 7 of the LGPD) to enable the services.
- Opt-in (Explicit Consent): Used for purposes that go beyond the contracted service, such as third-party marketing communications and non-essential cookies.
- Opt-out (Right to Object): We guarantee clear mechanisms for opting out of targeted advertising and managing cookie preferences via banner ads.

Pillars of Security and Rights

- Rights of Data Subjects: Direct channels and established processes for exercising rights (access, correction, and deletion).
- Security Standards: Reinforced by the revision of the Information Security Policy in 2025/2026, including state-of-the-art encryption, strict access controls, and 24/7 monitoring.

Children's and adolescents' privacy

LWSA offers technology solutions and services primarily focused on entrepreneurial and corporate audiences. In this context, as established in our Terms of Use and centralized Privacy Policy, our services are intended exclusively for individuals over 18 years of age or legally emancipated. In strict compliance with the General Data Protection Law (LGPD) and the guidelines of the National Data Protection Agency (ANPD), we guarantee that any eventual processing of data from minors - when strictly necessary for compliance with legal obligations or to guarantee security - will always be carried out in the best interest of the minor and through the application of rigorous technical and administrative safeguards.

Evolution of Governance (Program 3.0)

With the launch of the Privacy 3.0 Program in August 2025, the Company structured a new Governance phase to serve as the foundation for the future Consent Management module (planned for 2026/2027). This project will carry out a thorough technical review across all business units, ensuring that opt-in and opt-out flows operate in a perfectly synchronized, transparent, and standardized manner.

Furthermore, maintaining a centralized DPO (Data Protection Officer) and using proactive monitoring tools ensures that the scope of these policies is effectively applied across all customer touchpoints (websites, platforms, and applications), mitigating compliance gaps between brands within the ecosystem.

In addition to the Privacy and Cookies Policy, the commitment extends to the Information Security Policy, Privacy Policy for Job Applicants, Anti-Spam Policy, and Terms of Use and Service Agreements.

Integration with the Privacy Program 3.0

As a priority for the 2026 cycle, the Program established the Data Mapping and DPIA Module within its Privacy Framework. This module aims to:

- Inventory and update: continuously review the data mappings of all business units.
- Systematize: institutionalize the DPIA workflow as a mandatory step in the new product and partnership development cycle, consolidating the culture of *Privacy by Design.*
- Monitor: create a centralized repository of impact assessments to ensure traceability and ongoing compliance with the National Data Protection Agency (ANPD).

In this way, LWSA ends 2025 with a fully established governance foundation so that, in 2026, DPIAs can be carried out in a scalable, automated, and standardized manner throughout the ecosystem.

Data privacy governance

The privacy governance structure was strengthened in 2025 with the hiring of an in-house privacy specialist and the creation of the Privacy and Data Protection (P&PD) Team. This team acts as the operational and strategic core of the program, interfacing directly with the external Data Protection Officer (DPO) and ensuring the implementation of guidelines throughout the ecosystem.

- The current responsibility structure consists of:
- Internal P&PD Team: Responsible for managing the Privacy 3.0 Program, maturity assessments, and interfacing between business units and the DPO.
- External DPO: Provides specialized legal support, assistance with complex incidents, and legal validation.
- Legal Department: The executive supervisory body that ensures the compliance of operations and alignment with the company's strategy.

We regularly conduct analyses to identify vulnerabilities and mitigate privacy risks. LWSA has a consistent track record of applying Data Protection Impact Assessments (DPIAs) to strategic projects, with significant milestones since the implementation phases of the LGPD (Brazilian General Data Protection Law) in 2022. With the restructuring of internal teams and the strengthening of our governance structure in August 2025, driven by the creation of the P&PD Team, we have further improved our guidelines.

Currently, Data Protection Impact Assessments (DPIAs) are rigorously conducted for all projects involving the large-scale processing of personal data or data classified as sensitive, aiming at the early identification of risks and the assertive implementation of mitigating measures (technical and administrative controls).

Reinforcing this structure, LWSA maintains the Privacy and Data Protection Center and Forum (P&PD), collegiate bodies that bring together strategic leaders to deliberate on privacy risks and guidelines across all business units. The joint action of these forums mitigates the impact of a lack of documentation and formalization. With the start of the governance phase of the Privacy 3.0 Program, the Center ensures the standardization of documentation and the registration of operations (RoPA) throughout the LWSA ecosystem.

The company ensures the rights of data subjects as stipulated in the LGPD (Brazilian General Data Protection Law) through established communication channels, the main one being the official email address privacidade@locaweb.com.br. The professionalization of this official channel, consolidated as a single focal point and supported by a Data Subject Rights module, guarantees transparency and legal compliance in handling requests. Currently, LWSA processes received requests (predominantly data deletion requests) seeking full compliance with legal deadlines.

In 2025, as part of the Privacy 3.0 Program, we began implementing the first module of our Privacy Framework, which consists of a detailed maturity assessment across the entire LWSA ecosystem. This diagnosis allowed us to identify the compliance level of each unit and establish specific action plans to raise the company's data protection standards. This data-driven approach and continuous improvement strengthen our resilience against operational and reputational risks, ensuring robust and auditable privacy governance.

The Privacy Framework includes a specific module dedicated to restructuring and optimizing the flows of data subject rights. This project aims to:

- Standardization: Unify customer service processes across all business units within the ecosystem, ensuring the same experience and efficiency for every client of the Group;
- Optimization: Review internal workflows to ensure even faster and more accurate responses;
- Governance: Centralize the monitoring of these requests under the supervision of the P&PD (Privacy and Data Protection) Team.

Although the email channel already operates as a unified point of contact, strengthening and definitively standardizing these internal flows are strategic priorities mapped out for the current cycle, aiming to raise the level of compliance and transparency towards data subjects.

In this same vein, LWSA bases its data collection on the principle of necessity, limiting itself to what is strictly necessary for the provision of contracted services, compliance with legal obligations, and a duly evaluated legitimate interest.

Recognizing the complexity of managing the data lifecycle in a diverse ecosystem, the Privacy 3.0 Program has established the development of the Data Retention and Deletion module as a strategic priority for the current cycle. To ensure proper deletion and anonymization, this project, integrated into the Group's Privacy Framework, provides for:

- Unified Retention Schedules: Definition of standardized retention periods for all business units, respecting the regulatory specificities of each sector of activity.
- Retention and Deletion Policy: Development of a clear corporate guideline on the secure disposal of information after its purpose or legal deadline has passed.
- Data Governance: Implementing controls to ensure that data minimization and selective retention are applied consistently across all Group platforms.

With these initiatives, LWSA aims to evolve from a minimization model based on contractual policies to an auditable and centralized data governance model.

Internal use and sharing of data with third parties.

Internally, the data collected is used to ensure excellence in the provision of contracted services, including customer support, billing, fraud prevention, improvement of the platform experience, and compliance with legal or regulatory obligations. Access to this information is strictly restricted to authorized employees, according to the needs of their roles and the guidelines of the Company's Information Security Policy.

The company maintains a commitment to absolute transparency regarding the sharing of data with third parties, basing such operations strictly on the legal bases provided for by the LGPD (such as contract execution, legitimate interest, or consent, as applicable), and publicly declares that it does not trade (sell) personal data. Data subjects are informed about these categories of sharing through the Group's Privacy and Cookie Policies.

The sharing of personal data with third-party service providers and LWSA companies occurs exclusively under the following circumstances:

- Service provision and suppliers: sharing with partners essential to the operation (e.g. gateways payment, cloud/hosting services, CRM tools and logistics).
- Among companies in the LWSA ecosystem: for administrative management and service synergy purposes, always respecting the purposes informed to the data subject.
- Compliance with a legal obligation or court order: when requested by competent authorities or for the regular exercise of rights in judicial or administrative proceedings.
- Corporate transactions (M&A): in cases of mergers, acquisitions, incorporations, or sale of assets, where data may be transferred as part of the business's assets, the continuity of transparency and the maintenance of data subjects' rights are guaranteed in accordance with the original Privacy Policy.

In this way, whenever data is shared with third parties, the data subjects will have confirmation of the processing of this data, ensuring total transparency and compliance with personal data protection regulations.

To ensure the security of this process, the Privacy Program also covers its entire ecosystem of suppliers and business partners, with legal governance in the process of unification. In 2025, the advancement of the Third-Party Management Module (Program 3.0) focused on the transition from the contractual model to the technical audit model.

- Unified Legal Security: the company is in the process of centralizing the operation of its legal department to ensure that 100% of contracts with third parties have standardized data protection clauses (DPAs) that comply with the LGPD (Brazilian General Data Protection Law). This process is expected to be completed in 2026.
- Evolution of Technical Approval: in the 2025 cycle, the P&PD Team completed the development of the Unified Privacy and Security Due Diligence Questionnaire. This instrument aims to technically audit supplier controls before contracting.
- Operational Integration in Progress: While business units currently apply individualized verification flows, the holding company is working on integrating this questionnaire into the global procurement process. The goal is to unify the approval flow between Privacy, Security (GSI), and Procurement, ensuring a homogeneous entry criterion for the entire ecosystem.



With the aim of continuously improving this area, the Privacy 3.0 Program has established the development of the Third-Party Management module for the 2026 cycle, whose main deliverables will be:

- Standardization of Requirements: Defining minimum privacy requirements that all third parties must meet to be authorized to process data on behalf of the Group.

- Consent Governance: Refining consent collection mechanisms in cases where data sharing has secondary purposes (such as marketing or partnerships), ensuring that the user's choice is respected and auditable throughout the ecosystem.

Regarding implementation and targeted advertising, privacy practices in 2025 followed the company's transparency guidelines, with the following milestones:

- Control Mechanisms: Currently, targeted advertising is managed through cookie banners to control preferences and opt-out links in email marketing communications, ensuring respect for user choices.

- Evolution Roadmap (Consent Management Module): As planned for the 2026/2027 cycle, the implementation of this module within the Privacy Framework will involve a technical review of all consent collection flows across business units, aiming to optimize and standardize governance over data used in marketing and advertising campaigns.

Currently, LWSA ensures compliance in these relationships through strict contractual clauses (DPAs) and advisory support from the P&PD Team, preparing the ground for the automation and standardization of these flows in the coming year.

As part of the strategy to scale and expand the reach of the topic for the 2026 cycle, the P&PD Team plans to launch a Privacy Ambassador Campaign, which aims to create points of contact in different business areas to organically disseminate a data protection culture across all business units.



Use of data for secondary purposes and unique identification.

LWSA uses the Brazilian General Data Protection Law (LGPD) as the primary jurisdictional regulation for defining and processing personal data. Additionally, the Company's governance seeks alignment with international best practices, using the European General Data Protection Regulation (GDPR) as a reference, especially regarding the concepts of Privacy by Design.

In full alignment with these guidelines and operational sharing rules, we report that the number of unique users whose information was used, shared, or sold for secondary purposes (such as third-party advertising unrelated to the contracted service) during the reporting period was zero (0).

To ensure the accounting accuracy of our metrics (ensuring the counting of unique individuals and not just multiple accounts), the Company adopts the method of using unique identifiers (Master UID, such as CPF or CNPJ). This primary key spans the different services contracted within the same business unit, preventing duplicate counting. As a step in the technical evolution of this process, the implementation of the Data Mapping module of the Privacy Program 3.0 (planned for the 2026 cycle) describes and lists all categories of personal data and sensitive personal data processed in a specific product or service.

Targeted advertising and consent management

The privacy policies of the LWSA ecosystem are both informative and normative in nature, establishing clear guidelines for data processing. The scope of these policies ranges from the collection of registration data to the use of electronic identifiers (cookies) aimed at personalizing the experience and marketing actions, as detailed in our centralized Privacy and Cookies Policy.

In 2025, the implementation of our privacy practices related to targeted advertising followed the Company's strict transparency guidelines. To ensure complete respect for user choices, we offer direct control mechanisms, managing advertising through cookie banners for preference configuration and providing opt-out links in all email marketing communications.

As part of our continuous evolution roadmap, we foresee the implementation of the Consent Management Module in the 2026 cycle, which is fully integrated into our Privacy Framework. This module will promote the technical review of all consent collection flows in business units, with the aim of optimizing and standardizing governance over data used in marketing and advertising campaigns, refining collection mechanisms for secondary purposes throughout the ecosystem.



Employee training focused on the LGPD

Currently, LGPD training is mandatory for all new employees of LWSA and group companies during their onboarding period. The training covers the main points of the LGPD, including but not limited to:

- Objectives of the law;
- Concepts;
- Principles;
- Legal basis;
- Rights of data subjects
- Role in the management of personal data processing;
- Sanctions;
- Good practices in Information Security.

Similarly, we have proactively prepared ourselves regarding Artificial Intelligence, with training not only for the Legal Department, but for the Company as a whole, addressing regulations, emerging legislation, and the ethical use of AI.

Currently, we conduct Information Security training applied during onboarding for new employees and annually, covering the following topics:

- Information Classification
- Data Privacy
- Password Best Practices, Clean Desk, Use of Corporate Email and Artificial Intelligence
- Social Engineering
- What to do in case of incidents.



Incident Management

GRI 418-1

In addition to these preventive, educational, and governance measures, LWSA has a dedicated Incident Management team operating 24/7. This potential risk is actively mitigated by the strong integration between the Privacy & Data Protection Team (P&PD) and the Security Operations Center (SOC). The company has implemented advanced threat detection systems that monitor the environment via the SOC (Security Operations Center) department to detect signs of suspicious activity. These operational flows for rapid incident response work in conjunction with the adoption of the Privacy by Design methodology in the creation of new products. In the event of breaches, the team acts quickly to contain and eradicate the threat and initiate the appropriate response process. The Company acts quickly and effectively to internally comply with data protection laws, fulfilling the legal requirements for timely notification to regulatory authorities and affected parties, which is crucial to minimizing reputational damage.

Mitigation of potential data breaches is strengthened by strong integration between the Privacy & Data Protection Team (P&PD) and the Technology & Infrastructure team, ensuring rigorous incident response protocols and adopting the Privacy by Design methodology in the creation of new products and systems.

In this context, we report that the Company has not registered any substantiated complaints regarding violations of customer privacy during this period. Furthermore, no leaks, thefts, or losses of customer data were identified, and there were no penalties related to these issues. We also had no record of penalties or monetary losses resulting from legal proceedings related to the privacy of our users.

Security Certifications and Frameworks

LWSA recognizes that certifications play a crucial role in ensuring quality and compliance in its operations. Therefore, each company in the group is responsible for maintaining its active certifications, adapting them according to their respective businesses and sectors of activity, in addition to renewing them regularly to ensure full compliance with applicable rules and regulations. The IT Governance team monitors and tests these controls, serving as the primary point of contact for external audits and ensuring compliance with standards and regulations.

As previously mentioned, LWSA currently holds ISAE 3402 (SOC1 Type II) certification for its Data Center environment and PCI-DSS certification for operations involving card data, renewed annually through independent audits. Furthermore, information security controls, processes, and guidelines are implemented based on several well-known security frameworks, including ISO 27001/02, NIST and CIS, and AWS Security Pillar.



Innovation

GRI 3-3 Material topic: Innovation and technology

At LWSA, we are building an increasingly connected, collaborative ecosystem, ready to scale innovation. Modernizing our technological base is essential to support the growth of the ecosystem.

- Strategic Migration: We have completed the transition to the system SAP S/4 Hana. This project has increased the reliability of our financial data. Critical processes, such as backup routines that previously took 7 hours, are now executed in just 10 minutes.

- Democratization of Channels: We have consolidated LWSA as the vital link between Brazilian retail and major global marketplaces. Through partnerships with players such as TikTok Shop and Amazon, we enable small business owners to overcome technical barriers and integrate their inventory into new sales channels in just one day.

Our Artificial Intelligence development moves away from generic models to focus on real pain points: helping clients sell more.

By offering tools that integrate inventory with marketplaces in one click or accelerate the creation of online stores, LWSA's AI plays a relevant social role. It fosters the economy by allowing small entrepreneurs to overcome complex technical barriers and gain quick access to robust sales channels.

Artificial intelligence

At LWSA, innovation is the engine for building something lasting. Our consistent advancements in Artificial Intelligence in 2025 focused on two key areas: increasing internal operational efficiency and productivity, and developing products that generate direct efficiency for our clients. We understand that we are moving towards an agentic future, where AI agents cannot operate without a structured and contextualized database. This is precisely where our great competitive advantage lies: we possess a robust infrastructure of operations, processes, and data already orchestrated and simplified for the end customer. This advantageous position allows us to create integrated solutions that move away from generic models to focus on real pain points: helping the client sell more with less friction.

Our investment in Generative Artificial Intelligence (GenAI) gained scale and depth in 2025. We applied it to accelerate the retailer's routine, implementing intelligent automations that automatically create product listings and generate SEO (Search Engine Optimization) optimized texts. This reduces operational time, raises the bar for user experience, and increases the organic relevance of our clients' stores in search engines. Looking internally, we conducted mass training: more than 60% of our employees were trained in GenAI technologies, ensuring that our teams are prepared to lead this new frontier of productivity.

To support this technological advancement, we use our Software Engineering Chapter as the engine of this transformation. It creates the space to foster the exchange of ideas between experts from different business units, promoting best practices and the reuse of solutions. Thus, it is possible to promote innovation and generate gains in scale, speed, and standardization among LWSA units, resulting in a more cohesive ecosystem. The focus is on Artificial Intelligence, seeking its safe, efficient, and competitive use to increase productivity and quality. This Chapters strategy isn't limited to technology; it acts as a cross-functional knowledge management mechanism. Through them, we create integrated models that enhance synergy and shared learning, ensuring that best practices in 'customer focus' are disseminated uniformly across all business units, regardless of the brand of origin.

Research, Development and Innovation

The focus of our Research, Development and Innovation (R&D) work is twofold: to meet market demands for greater operational efficiency and cost reduction, while simultaneously driving a more sustainable economy. This is achieved through solutions that minimize the environmental impact of both our operations and those of our customers.

Over the years, we have built an environment of responsible and sustainable innovation. Our journey began with our adherence to Law 11.196/2005 (the "Lei do Bem"), a government program that grants significant tax benefits to companies that invest in R&D projects. Participation in this Program not only encourages investment in R&D, but also contributes to the technical and professional development of our team, reinforcing the social pillar of ESG.



Check out some of the technologies and practices developed:

- **Transforming data into decisions:** Bling has launched a tool that offers a complete and integrated view of business operations, with continuously updated data and interactive dashboards, without the need to use external tools.

- **AI for customer experience:** Octadesk has launched WOZ, which provides quick and contextualized answers, as well as improving understanding of the customer's situation. Companies can choose the appropriate tone of voice for each interaction, humanizing the customer service experience.

- **Cloud computing:** the use of cloud hosting and computing services, such as those offered by Locaweb, allows companies to reduce the need to maintain large, energy-intensive in-house data centers. Centralization in more efficient data centers can result in a smaller carbon footprint.

- **Energy efficiency in data centers:** Locaweb has data centers with infrastructure designed to maximize energy efficiency, reducing energy consumption and, consequently, associated CO_2 emissions.

- **E-commerce and marketplace solutions:** companies under the LWSA umbrella, such as Tray, offer e-commerce platforms that optimize the sales and logistics process, potentially reducing waste and improving operational efficiency, which can contribute to more sustainable business practices.

- **Smart logistics:** Melhor Envio, part of the LWSA ecosystem, provides solutions that can optimize delivery logistics, reducing distances traveled and, consequently, greenhouse gas (GHG) emissions.

Technology for the Longevity and Resilience of SMEs

In line with our commitment to promoting entrepreneurship and strengthening the resilience of Small and Medium Enterprises (SMEs) in Brazil, Bling launched the "Meu Negócio" (My Business) solution in 2025. The development of the tool was motivated by a latent challenge in the market: 38% of micro and small businesses close their doors before completing five years, with inefficient management being one of the main factors. In contrast, internal surveys show that companies that adopt management systems (ERPs) have a significantly higher survival rate after 60 months.

To democratize access to data intelligence and mitigate the mortality rate of small businesses, "Meu Negócio" acts as a smart and fully integrated dashboard. The functionality facilitates the management of entrepreneurs operating in multiple channels (physical stores, e-commerce and marketplaces).

> We believe that digitalization in a single, integrated environment is a key factor for the efficiency and longevity of businesses. With this innovation, LWSA reinforces its role as a technological support provider to keep pace with the accelerated growth of small and medium-sized retailers, providing the necessary control for fundamental and strategic decision-making.



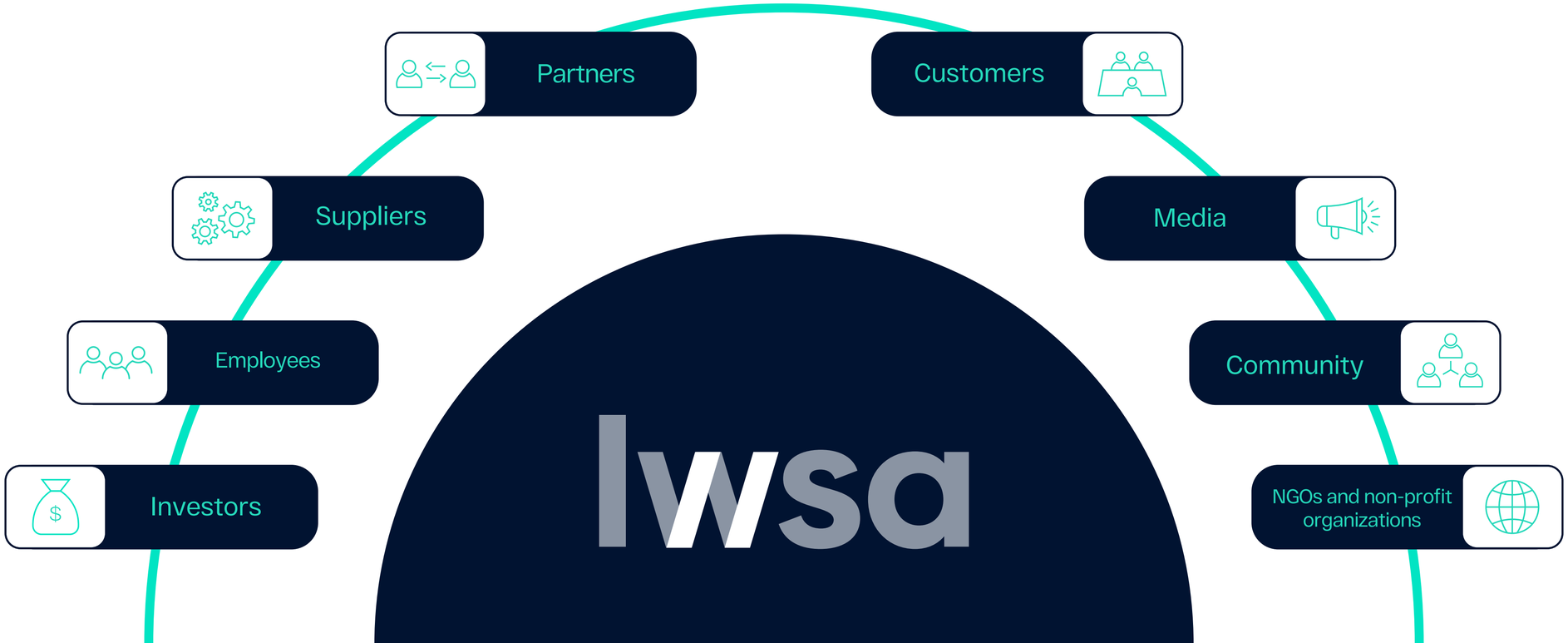
Relationship with stakeholders

Map the stakeholders

GRI 2-29

We value and constantly strive to improve our relationship with all our stakeholders. We prioritize transparent, ethical, and proactive relationships with all of them:

- Employees: Our contact is constant and designed for all stages of the employee journey, always focusing on development and integration. We promote alignment and listening through performance reviews and ongoing internal surveys. More than just having consolidated official communication channels, we value engagement in practice, carrying out recurring rituals of connection and exchange that strengthen our culture and transparency in our daily work.
- Suppliers and partners: they receive special attention from the Purchasing, Contracts, and Legal teams to ensure clarity regarding the values and services contracted.
- Customers: We have several contact channels, customer service, and tools for answering questions. We evaluate customer satisfaction using the Net Promoter Score (NPS). We encourage all units to participate in the Reclame Aqui certification process.
- Media: We provide a contact area on our website for our Public Relations team, and we also maintain frequent contact with media outlets identified in our strategy.
- Community and NGOs: Our headquarters are located next to the Peinha community in São Paulo, and we maintain an active relationship with its leaders through a WhatsApp group, in-person meetings, support for events, and recurring meetings organized by the ESG team.



Investors

The Investor Relations (IR) department at LWSA is responsible for our direct communication with the market. The main purpose of engaging with these stakeholders is to ensure the negotiability of the Company's shares, maintain a continuous, transparent and consistent dialogue, and contribute to strengthening market credibility and confidence.

This engagement process also aims to generate value for the shareholder by promoting greater visibility, predictability, and quality of information made available to the market, factors that contribute to the proper pricing of shares and long-term appreciation. Additionally, the continuous relationship with shareholders and investors allows the Company to capture market perceptions regarding its strategy and business. This data is evaluated internally and considered for improving communication, decision-making, and, where applicable, the strategic direction of the Company.

Within this area, we adopt a structured approach in which these stakeholders are identified and classified based on their role, level of influence, and degree of interaction:

- Individual and Corporate Shareholders: current and potential investors who acquire shares of the Company on the market with the aim of obtaining a financial return. Engagement with this audience occurs through the regular dissemination of information to the market, corporate events, and institutional communication channels, ensuring transparency, equitable access to information, and alignment with best corporate governance practices.
- Sell Side: this includes financial institutions that monitor the Company and conduct in-depth studies on strategy, operational performance, and prospects, with the aim of preparing reports, recommendations, and projections. The relationship with this group is based on the provision of public information, meetings, and presentations, strictly respecting the rules for disclosing relevant information and the equitable treatment of all market participants.
- Buy Side: this includes investment funds, asset managers, and institutional investors who analyze the Company in detail, focusing on capital allocation and generating financial returns for their shareholders and clients. Engagement with this audience occurs primarily through periodic meetings, conferences, and institutional presentations, always observing the principles of transparency, consistency of disclosed information, and regulatory compliance.

Our relationship and dialogue with our shareholders begins on the Investor Relations website, where we gather all regulatory and supplementary information about LWSA. We publish our financial results quarterly. The day after publication, we hold an earnings call where the Investor Relations team explains the period's performance and answers investor questions.

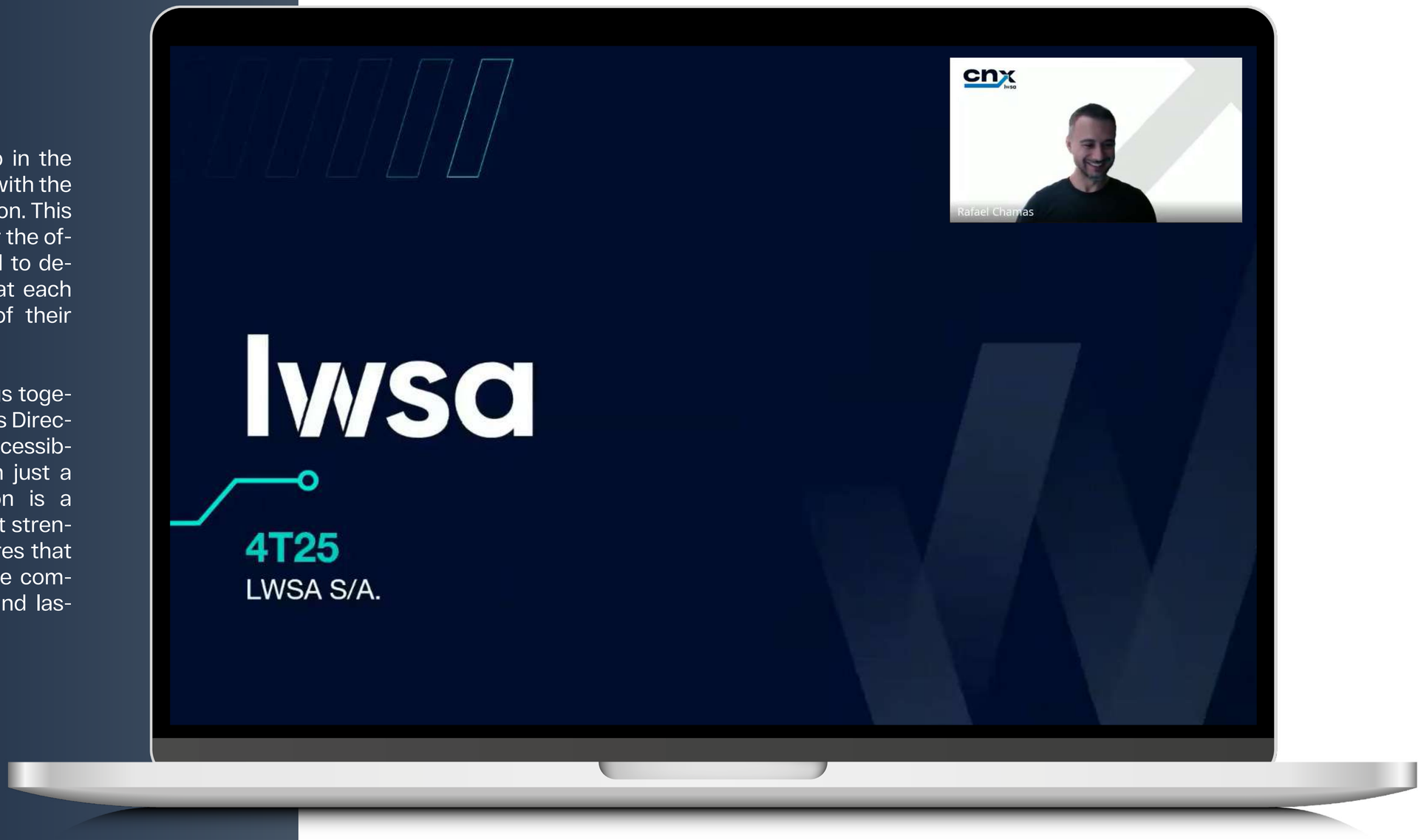
The Investor Relations area holds regular meetings with market stakeholders (analysts and institutional investors) to present the evolution of the strategy, discuss performance, and gather feedback. The Company also participates in capital market events and conferences to broaden the reach of its communication and reinforce its strategic messages.



LWSA Connection

In 2025, we took a fundamental step in the evolution of our transparency culture with the implementation of the LWSA Connection. This quarterly ritual, held immediately after the official release of results, was designed to democratize information and ensure that each employee understands the impact of their work on the ecosystem.

Held entirely online, the meeting brings together the CEO and the Investor Relations Director to translate financial figures into accessible and practical language. More than just a data presentation, LWSA Connection is a space for light and direct dialogue that strengthens our collective vision and ensures that all our talents remain aligned with the company's strategy, seeking consistent and lasting results.



People Management

GRI 2-7, 2-8, 3-3 Employee Journey

The year 2025 marked the second year of the strategic restructuring of the People, Culture and ESG department. This initiative was motivated by the adoption of an ecosystem vision, seeking greater integration and efficiency. The main focus of this restructuring was the development of a more targeted and integrated approach to the entire employee journey within LWSA.

The transformation resulted in significant efficiency gains. Optimizing the HR structure, along with the strategic restructuring of management and specialists, allowed the team to increase quality and technical depth. This was achieved through the use of technology to automate processes, eliminating repetitive manual tasks and reducing the risk of error.

In 2025, LWSA had 3,383 employees distributed across various regions of Brazil, working on-site, remotely, and in hybrid models. Regarding regional distribution, the concentration of headcount in the Southeast region reflects the location of the company's administrative headquarters and main operational units. The other regions show occupancy proportional to the number of branches. The observed gender composition is influenced by the characteristics of the company's sector of activity and by current diversity and inclusion policies, which seek equity at all levels and regions.

LWSA required 23 permanent outsourced professionals at its headquarters for facilities activities: 11 in cleaning and maintenance, 11 in security, and 1 gardener. The number of workers remains constant because these are fixed and routine activities.

Journey and Talent Development

Talent management

At LWSA, talent management is seen as a strategic pillar for the sustainability and growth of our ecosystem. When we think about the employee journey, we carefully examine each stage of our employees' interaction with the company. The main focus is on attracting and retaining talent and developing this internal audience, aiming to achieve the best results for the organization, with the best people, the best professionals, strengthening our business.

To achieve this, LWSA implements talent management policies and practices that encourage continuous development and retention, creating a work environment that is both attractive, engaging, and conducive to professional growth.

Our talent pipeline strategy focuses on the early identification of critical positions and profiles to ensure operational continuity and leadership development. We intentionally direct identified talent toward development experiences and strategic projects. This increases the repertoire, visibility, and systemic vision of these professionals, accelerating the development of technical and behavioral skills crucial for the future of the Company.

When there is no immediate succession, we focus on proactively identifying high-potential internal talent. We structure action plans and preparation journeys to ensure their technical and behavioral readiness, enabling them to take on new responsibilities in the medium term. This strengthens our employer brand and promotes internal mobility and recognition.

Attraction and Retention

To strengthen talent attraction and retention, we implement sustainable and consistent compensation and benefits strategies aligned with the business strategy, as well as recognition programs linked to professional development. On an ongoing basis, we conduct detailed analyses to identify the main factors that motivate employee turnover, using tools such as exit interviews and dashboards to monitor key indicators.

As a result of this monitoring in 2025, we highlight:

- Turnover and Attrition Analysis: The fluctuation is explained by the accumulated turnover (32.01%) and attrition (34.86%) rates. A peak in terminations was observed in May/25 (3.67%) and June/25 (3.58%), which contributed to the reduction in staff in the second half of the year.

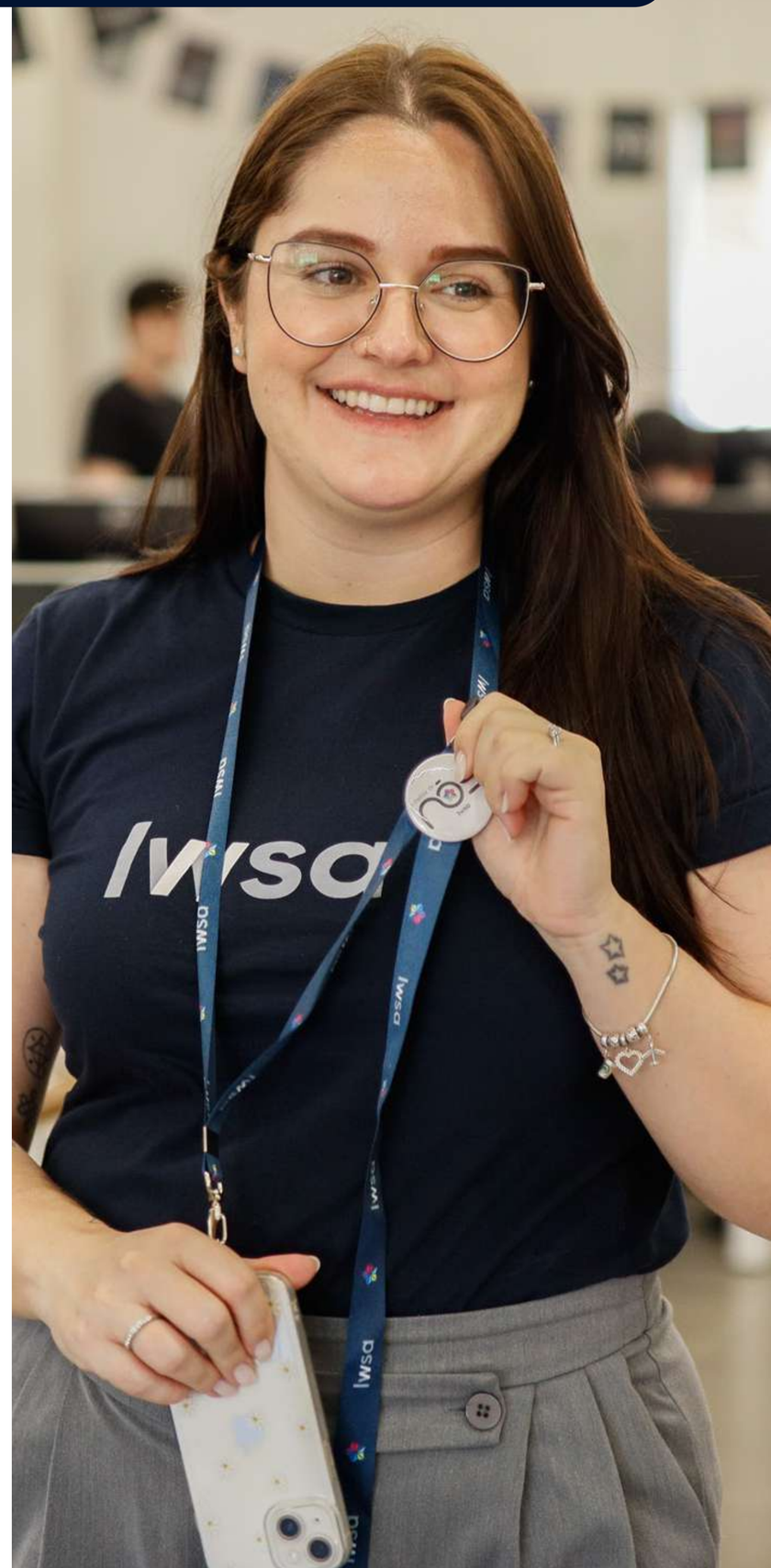
- Operational Context: The monthly fluctuations did not result from atypical systemic events, but rather from the natural flow of replacements and structural adjustments in relation to the approved budget.

- Recent Stability: In the last quarter (Oct/25 to Dec/25), headcount showed greater stability, with minimal variations, despite a sharper drop in turnover in December (2.26%), indicating greater retention at the end of the year.

At LWSA, turnover risk is strategically treated as a monitored and anticipated indicator. During performance review cycles, leaders respond to the Retention Beacon, a tool designed to measure the Risk of Loss and the Impact of Loss for each professional. This practice allows the Human Resources team and the Executive Board to proactively map critical areas, enabling customized retention actions such as salary adjustments, proposing new challenges, or internal transfers.

Additionally, the risk of human capital loss is mitigated through continuity assurance. During performance reviews, leaders indicate potential successors for key positions. By focusing on developing this internal pipeline, the Company ensures a swift leadership transition, reducing costs associated with external hiring and optimizing onboarding time.

We also understand that offering clear growth prospects is one of the most effective ways to prevent burnout and retain our talent. For this reason, after the official feedback sessions for performance reviews, we rigorously monitor the registration of Individual Development Plans on our platform. This step is essential to connect each employee's career aspirations with the needs and strategic objectives of our ecosystem.



Employer branding

At LWSA, we invest in employer branding through internal initiatives focused on talent retention, engagement, and continuous development. Externally, we promote our values and culture, fostering a collaborative and inclusive work environment where individual growth is encouraged, regardless of differences.

We attract new talent through transparent and inclusive recruitment across various digital platforms, partnerships with educational institutions, and in-person events. Internally, we use a referral and bonus program to attract qualified and diverse talent.

We conduct regular analyses of the labor market and recruitment trends to adjust talent attraction and retention strategies, aligning them with best market practices and in accordance with the company's corporate objectives and vision.

In talent acquisition, we map future needs, defining the crucial skills and abilities for business success. We have established strategic partnerships with educational institutions and relevant organizations to develop new talent pools, including internships, joint research projects, participation in academic and professional events, among other initiatives.

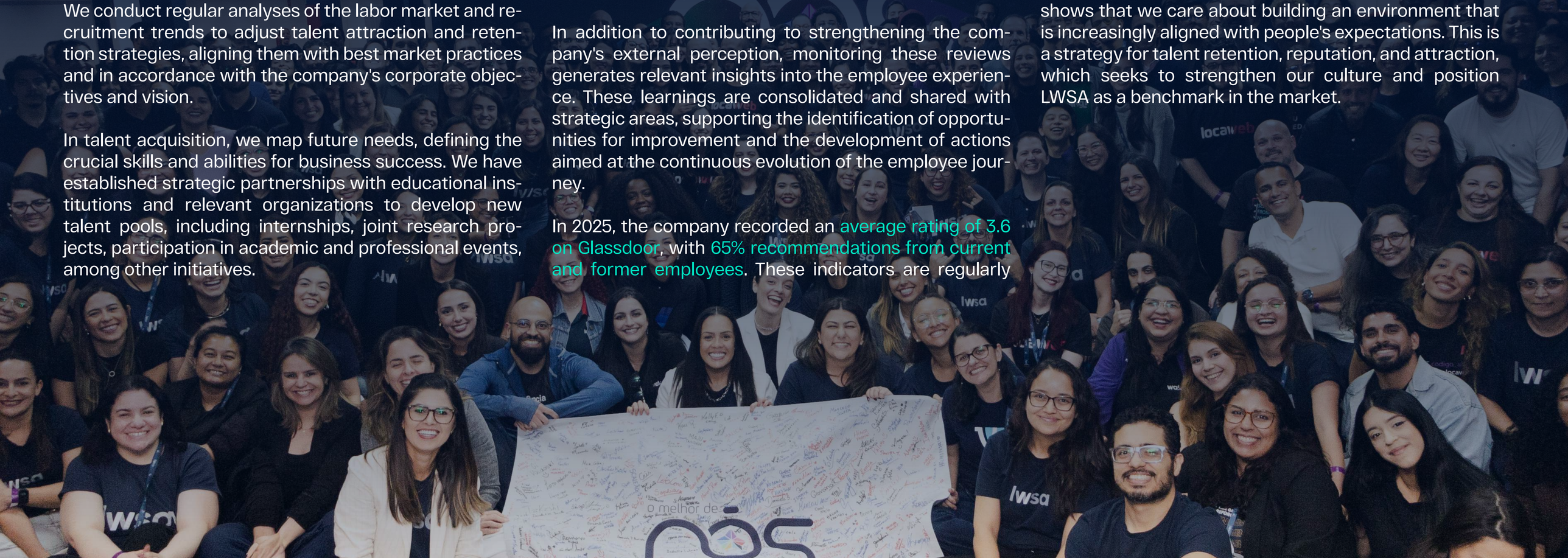
Through strategic actions, we demonstrate our commitment to reducing turnover, minimizing the loss of intellectual and human capital, and strengthening our ability to attract talent, promoting and encouraging an inclusive work environment in line with the Company's values.

As part of its employer branding strategy for the 2025--2026 cycle, the company has begun continuously monitoring reviews on the Glassdoor platform, actively responding to comments posted on the 12 pages representing companies in the LWSA ecosystem. This initiative reinforces its commitment to transparency, active listening, and employer reputation management.

In addition to contributing to strengthening the company's external perception, monitoring these reviews generates relevant insights into the employee experience. These learnings are consolidated and shared with strategic areas, supporting the identification of opportunities for improvement and the development of actions aimed at the continuous evolution of the employee journey.

In 2025, the company recorded an average rating of 3.6 on Glassdoor, with 65% recommendations from current and former employees. These indicators are regularly monitored as part of the metrics for tracking the employer branding and employee experience agenda. As part of the structuring initiatives of this agenda, LWSA also began revitalizing the career pages of all its units. The project aims to strengthen communication of the organizational culture and give greater visibility to the Employee Value Proposition (EVP) of the ecosystem, contributing to increasing the company's attractiveness and stimulating the organic generation of qualified candidates.

Monitoring, responding to, and acting on feedback is a way to show that we are listening. And more than that, it shows that we care about building an environment that is increasingly aligned with people's expectations. This is a strategy for talent retention, reputation, and attraction, which seeks to strengthen our culture and position LWSA as a benchmark in the market.





Performance appraisals and feedback processes

The company's Performance Management process, including Performance Appraisal, feedback on appraisals, and the creation and monitoring of Individual Development Plans, involves several steps that help align employee goals with those of the organization, guide decision-making, and promote the continuous development of employees.

During the process, clear and measurable objectives are defined for each employee, aligned with the company's strategic objectives, providing a solid foundation for Performance Evaluation. In a structured way, the process is composed of steps that align individual objectives with the organization's strategic objectives, guide decision-making, and promote the continuous development of employees. Throughout the process, clear and measurable objectives are defined for each employee, aligned with the company's strategic objectives, providing a solid foundation for Performance Evaluation. The methodology allows for standardizing the evaluation criteria across the entire ecosystem, ensuring equality in the comparison of talent.

Furthermore, this process, carried out annually for all employees, aims to evaluate their development based on the necessary skills, according to the complexity of each position, to ensure the success of LWSA.

To support this journey, we have invested in more centralized internal communication, working to ensure that our different channels disseminate our organizational development processes and strategy, providing each employee with the opportunity to better understand LWSA and their role within it. We promote a culture of feedback and open dialogue, encouraging our employees to express their concerns and suggestions for improving the work environment. We encourage the recurring practice of development conversations and official feedback sessions to evaluate the cycle as a whole.

To ensure the quality and effectiveness of these steps, leaders are trained to conduct these evaluations in a fair, objective, and constructive manner. After the evaluations are completed, they undergo training focused on providing high-quality feedback and precise guidance to drive the development of each employee.

The results were immediate: in 2025, we achieved 97% employee alignment with the meritocracy policy. We also highlight a 26% reduction in so-called 'critical cases' (significant misalignments between performance and compensation), which fell from 249 to 185 cases, demonstrating an increasingly meritocratic and transparent environment.

Internship and trainee programs

The company's Internship Program acts as an acceleration lever for undergraduate students, both bachelor's and associate's degree holders. With semester-based application cycles, the program proposes a 12-month journey focused on transforming academic potential into professional power, fueling LWSA's junior-level talent pipeline.

The pedagogical structure for 2025 was divided into two major development pillars. In the first semester, the focus was on innovation; interns were organized into nine multidisciplinary groups to solve real-world challenges proposed by leadership. This process was supported by seven technical workshops, culminating in the presentation of projects to an evaluation panel composed of company managers and coordinators.

In the second half of 2025, the program prioritized behavioral refinement. Four soft skills workshops based on LWSA's universal competencies were held, ensuring that interns had the necessary support to begin their careers. In addition to this content, interns also participated in discussion groups and business and career talks with more experienced company professionals. At the end of the period, 27 interns were hired, solidifying the program as a gateway for talent into the organization.

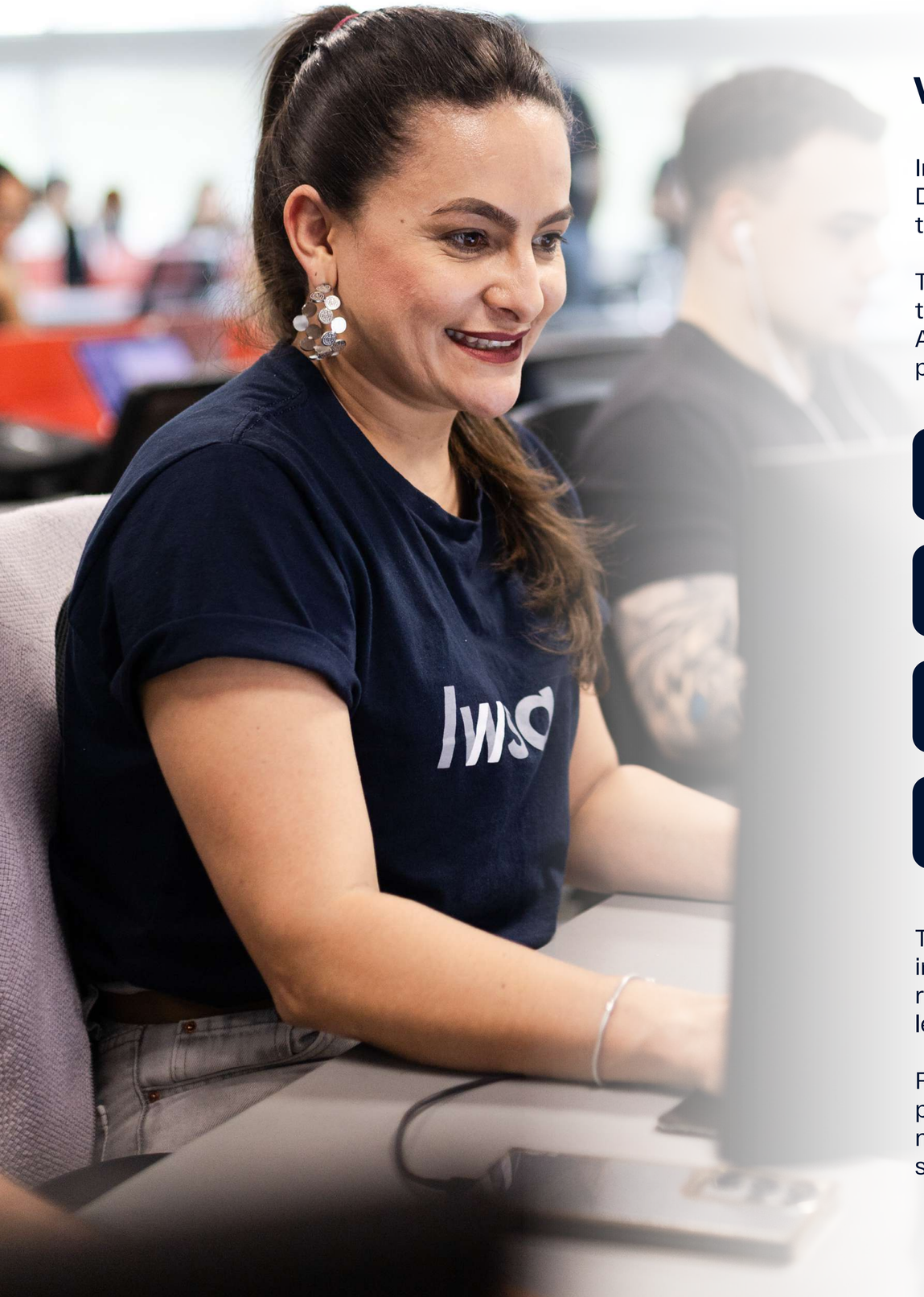
The Talent Acquisition team has focused its efforts on analyzing previous editions of the program, identifying opportunities for improvement, and mapping areas with the greatest potential for absorbing interns, considering real career and permanent employment possibilities. In addition, there is a significant focus on building a simpler, more agile, and humanized candidate journey, aiming to strengthen the perception of the employer brand and increase the attractiveness of the program.

Developing talent since 2014, the LWSA Trainee Program is designed for professionals who have graduated from undergraduate courses within the last two years. In addition to enriching the ecosystem with new talent, the program aims to develop high-performance skills and prepare them for highly relevant positions within the company. Across seven editions, the program has already hired more than 60 professionals in different business units.

In each new edition, lasting 18 months, trainees go through an intensive development track to enhance their skills and carry out high-impact strategic projects for the Organization.

In 2025, the focus was on finalizing the previous cycle and selecting new trainees, who will begin onboarding in February 2026.





Work environment

In 2025, the corporate culture restructuring project focused primarily on consolidating LWSA's DNA. This alignment was essential in the post-acquisition scenario and after the simplification of the brands, aiming to establish unified values and behaviors across all business areas.

To make our cultural transformation tangible, we adopted the Culture Design Canvas (CDC) methodology. This model acts as our roadmap, translating values and purposes into daily practices. As a result of this listening process with nearly three thousand employees, we defined four clear priorities that govern our work environment:

1. The best of us: We strengthen integrity and leadership to do more and better.
2. All together for the customer: We unite teams and decisions to put the customer at the center of everything.
3. Everyone's success is LWSA's success: We align our efforts to expand the value generated for the ecosystem.
4. We care about our people: We cultivate an environment where well-being, psychological safety, and development are absolute priorities.

The transformation was marked by the launch of this cultural evolution through the Roadshow, an initiative that ensured the CEO's physical presence in all units. To guarantee an equitable experience, we used gamification to engage remote employees, ensuring that everyone had the same level of immersion.

Furthermore, 2025 consolidated the implementation of new corporate rituals essential for transparency and alignment, such as the quarterly disclosure of financial results open to all employees, new onboarding processes with direct CEO participation, and the holding of annual leadership offsites to strengthen management.

Benefits and Profit Sharing

GRI 2-30, 401-2

For all LWSA companies, we have the benefits listed below. Some of them have different eligibility requirements, as highlighted with [1] or [2].

[1] Benefits that are not valid for interns.
[2] Benefits that are not valid for temporary contracts and internships.
[3] This benefit is not valid for all units.

General benefits:

- Dental plan
- Birthday day off
- Transportation voucher
- Health plan
- Meal voucher
- Wellhub allows for the inclusion of up to 3 family members.
- Profit Sharing Plan (PPR)[1]
- Extended maternity and paternity leave[1]
- OnHappy
- Childcare allowance[1]
- Discount on pet health insurance plan with Flockr
- Life insurance
- Home office allowance for employees with hybrid or remote contracts.

Exclusive benefit for employees registered only with LWSA headquarters:

- Free shuttle service from the terminal to the nearest metro station. Free massage and psychological support services.
- Complimentary LWSA[3] products

Exclusive benefits for Corporate Director I, Director II, Vice President, and CEO:

- Company-paid car.

Exclusive benefit for Bling[2] employees:

Educational assistance:
- High school or technical school: 45% tuition subsidy, limited to R$ 150 (monthly);
- Undergraduate degree: 50% subsidy of the monthly fee, limited to R$ 300 (monthly);
- Postgraduate studies: 50% tuition subsidy, limited to R$ 300 (monthly).

Language assistance (after 12 months with the company):
- For employees who need to know the language due to their position or activity: limit of R$ 200 (monthly);
- For general team members: limit of R$ 150 (monthly). For management positions: limit of R$ 250



Training and capacity building

GRI 404-1, 404-2

We encourage the improvement of our employees' skills and the professional growth of each one of them. To this end, we offer a variety of training and professional development programs, including internal training, workshops, external courses, and mentoring programs to support the continuous growth and evolution of our employees. We also establish partnerships with educational institutions, professional organizations, and other relevant entities to actively develop new talent pools. These partnerships include internship programs, joint research projects, and participation in academic and professional events.

Evolution of Training Indicators

When analyzing the 2025 training indicators compared to the previous year, a substantial increase in the volume of reported training sessions can be observed. This positive fluctuation is a direct result of the improvement in our data governance and the expansion of the monitoring scope. In 2024, the accounting mainly covered LWSA's corporate operation and was limited to synchronous (live) training, which resulted in underreporting of training facilitated in other units.

In 2025, with the consolidation of our ecosystem, we began monitoring and reporting data from all business units in an integrated manner. This move was driven by the unification of the historical data from LWSA Conecta (our online corporate education platform), whose pages were previously decentralized. The accounting of asynchronous data from the platform, which includes the high consumption rate of mandatory courses, Individual Development Plan (IDP) training, and strong adoption of Artificial Intelligence Tracks (consumed by approximately 70% of the Company), ensured an accurate, complete, and comprehensive picture of the actual investment in technical and behavioral training carried out throughout LWSA.

In 2025, we invested in maintaining our Corporate Education platform, the LWSA Conecta which has 2,903 active content items available to all employees. In addition to the platform, we promote high-impact training initiatives throughout the ecosystem:

Unification of the Onboarding Process: Starting in February 2025, 1,036 people were integrated into a unified routine, covering information security, code of ethics, products, ESG, and compliance, creating a systemic view of the Company.

Artificial Intelligence Tracks: We trained all levels of the Company through the AI for All Track, focusing on GenAI tools (such as Gemini). There were 2,552 graduates, and we noted a jump in accuracy on knowledge assessments from 63.4% to 85.1%, resulting in a 202% increase in the daily use of AI tools. For developers, we offered the Masters of AI track, with 56 graduates, focusing on programming via Vibe Coding.

Targeted Actions: We conduct specific training for areas such as Customer Success (Wake), Products (Vindi) and Sales, with the support of specialized consultancies (Tera, PM3, Flow) and our own internal expertise.

We run several employee development programs, the impact of which is measured by verifying the participant's retention within the company and whether they received promotions or internal transfers. We highlight the following programs:

Incentive for Education: This policy offers all LWSA companies subsidies for training programs that promote the individual development of employees at external educational institutions. It's a strategy used by leaders to manage their talent within performance management, serving as an incentive beyond mere mobility, promotion, or new challenges. The initiative is intended for undergraduate, postgraduate, professional master's, and language courses. The criteria established by the policy stipulate a subsidy of 50% to 100% of the tuition fees. The subsidy agreement establishes a retention period at the Company after completing the course.

Young Apprentice Program: In accordance with current legislation and with a commitment to promoting social and professional inclusion, LWSA maintains its Young Apprentice Program. Aimed at young people between 14 and 24 years old, the program requires mandatory theoretical training with the integrating body, connecting technical learning to daily practice. Reflecting the quality of this support, the year 2025 ended with the hiring of 10 apprentices, who transitioned to positions such as assistants, analysts, and, in some cases, joined the Internship Program.

Continued employability and career transition

LWSA's career transition and end-of-career (retirement/termination) assistance programs aim to facilitate continued employability, aligning with the organization's vision and values focused on its core values.

Focus on Training and Continuous Development: LWSA prioritizes investing in the continuous training and development of its employees. The Company offers a variety of training programs, learning opportunities, and individualized development plans to help employees acquire new skills and advance their careers within the Company.

Culture of Internal Opportunities: We encourage a culture of opportunity and internal growth. The company prioritizes internal promotion and the search for talent within the organization to fill vacancies, allowing people to develop new skills and accept challenges in different areas and roles.

Lack of a Mass Layoff Policy: Our people management focuses on valuing and retaining talent, which is why we do not adopt a policy of mass layoffs. We are looking for a stable and engaged team, avoiding the need for career transition assistance due to large-scale redundancies.

Individual Employee Responsibility: LWSA encourages and supports the career development and employability of its employees, offering resources to help them stay up-to-date, explore growth opportunities, and prepare for future transitions.

Respect for Privacy and Autonomy: We respect the privacy and autonomy of employees regarding their careers and retirement. The company does not impose career transition assistance programs, recognizing the variation in individual needs.

By adopting this approach, LWSA demonstrates its commitment to providing a work environment that values and invests in the development of its people throughout their careers, promoting a culture of continuous learning, internal mobility, and individual accountability.

Leadership Development

In line with our training pathways, in 2025 we reinforced our investment in the development of our leadership, ensuring close monitoring from newly appointed managers to senior management positions. Our goal is to empower them to perform their role with excellence, acting as true guides in the growth and career development of our people.

We conducted over 10 training sessions dedicated to leadership, aiming to foster a sense of responsibility among leaders for conducting Performance Appraisal feedback sessions and supporting the development of Individual Development Plans for their team members. These initiatives included masterclasses that achieved significant leadership participation: 69.34% of coordinators, 74.88% of managers, and 68.29% of directors. In the practical workshops, we engaged over 86% of the registered managers. To support employees in this process, we developed an asynchronous IDP training course that reached 735 people, in addition to 6 practical workshop sessions that saw participation from over 76% of those registered. The training sought to bridge the gap between theory and practice, addressing real-world organizational cases and highlighting topics such as:

- The role of leadership in the performance cycle;
- Preparing and delivering effective feedback;
- The development and monitoring of Individual Development Plans;
- The management of evaluation and calibration committees;
- Making difficult decisions and sharing responsibility for team development.

Partnerships with educational institutions

LWSA's commitment to valuing human capital is reflected in a strategy of continuous development. To sustain this learning ecosystem, the Company operates on three complementary fronts: democratizing access to higher and technical education through institutional partnerships, our corporate education platform, and direct investment in customized development programs.

As part of our commitment to promoting academic development, LWSA establishes strategic partnerships with external educational institutions, enabling discounts and exclusive conditions for language courses, undergraduate degrees, postgraduate degrees, and MBAs. This initiative fosters employee empowerment in their educational journeys and enhances the visibility of our employer brand.

Additionally, the Company offers a corporate education platform with courses that support the continuous development of our team. Furthermore, LWSA invests in the execution of structured development programs, designed to meet specific demands and raise the level of competence of the teams. In collaboration with leading consultancies, LWSA co-creates curricula and learning paths that align best market practices with the organizational culture. Throughout 2025, this approach resulted in high-impact projects, such as specialized training via PM3 for Wake's Customer Success area and the Nahar Project, focused on improving Feedback and Individual Development Plans (IDPs) for the entire Company. These initiatives range from mastering emerging technologies to strengthening leadership, consolidating a high-performance culture.

We can also highlight the action carried out in partnership with Tera, with the objective of forming Vindi's Product team and developing a culture focused on outcomes, encouraging employee proactivity and making product decisions based on data that impact the business.



Remuneration and equal pay

GRI 2-30

Currently, the majority of our employees (98.5%) are covered by the collective bargaining agreement, excluding only statutory directors, board members, and interns. The salary adjustment for these directors is carried out annually (every 12 months, starting from the date of signing each contract), following the variation in the IPCA (Brazilian Consumer Price Index).

The Company is committed to ensuring pay equity and equality, focusing on attracting and retaining talent through market-aligned salary ranges and varied benefits packages that promote health and well-being. We adopt rigorous governance to combat salary distortions and turnover, based on merit calibration committees, internal movement studies, and monthly payroll audits, ensuring that career progression is clear and fair.

In addition, to combat unconscious biases and ensure greater fairness in merit-based evaluations, we implemented 'Lia Avalia'. This is an Artificial Intelligence tool that supports leaders in conducting performance-focused evaluations, helping to eliminate gender distinctions or other subjective factors in compensation decisions.

The effectiveness of these measures is actively monitored through Climate Surveys and shared with stakeholders via Salary Transparency Reports and results meetings. As a reflection of these ongoing actions, the average pay gap between women and men can be considered neutralized at LWSA when comparing December 2024 with December 2025. The overall comparative analysis for the period resulted in a negligible variation of only 0.13% compared to 2024, reinforcing our consistency in managing equitable compensation policies.



Diversity and inclusion

GRI 2-7, 405-1

The theme of Inclusion and Diversity (I&D) is part of the principles present in our Code of Ethics and Conduct and our Social and Environmental Responsibility Policy, applied to all business units. We carry out actions that seek to increase representation in our team and promote equity in our work environment, through training, educational campaigns and awareness-raising actions aimed at employees and leaders, strengthening the construction of a more inclusive organizational culture.

To monitor the effectiveness of the measures adopted, we have been conducting an Inclusion & Diversity census since 2019, an instrument that allows us to track the evolution of representation in our workforce and guide the definition of strategies.

Recent results point to significant progress. In 2025, 44.7% of the workforce is composed of women, and 39.8% of leadership positions are held by women[1], reflecting the Company's efforts to increase gender equality at different levels of the organization.

Among census respondents, 15.5% identify as LGBTQIAPN+ and 27.3% self-identify as Black (Black and/or mixed-race). We also observed progress in racial representation in leadership positions: in 2025, 19.92% of leadership positions are held by Black people, a higher percentage than that recorded in 2024, when this participation was 16.25%, representing an increase of 3.67 percentage points in the period.

The Company also maintains initiatives aimed at increasing the inclusion of people with disabilities in its workforce. By the end of 2025, LWSA had 134 employees with disabilities, reinforcing its commitment to building a more diverse and accessible work environment.

Note: [1] Data from the inclusion and diversity census

At LWSA, developing technology also means caring for people. Our commitment to a fairer, more diverse and inclusive work environment is reflected in the actions we promote internally, listening to and valuing the different experiences that make up our team and strengthening a culture based on respect, equity and belonging.

Inclusion and Diversity Committee

The committee is structured around six focus areas: women, People with Disabilities (PwD), LGBTQIAPN+, masculinities, generational diversity, and cultural and ethnic diversity. This committee not only leads strategic initiatives to promote a more inclusive work environment, but also serves as an important channel of support and acceptance for all employees belonging to underrepresented groups. The corporate volunteering program cycle lasts one year, ensuring more time to plan actions and generate impact.

inclusão & diversidade

culturas & origens

pessoas c/ deficiência

LGBTQIAP+

gênero



Health and safety

GRI 403-1, 403-2, 403-4, 403-5

We demonstrate our commitment to the well-being and quality of life of our employees through the Se Cuida Program, which offers each employee psychological support sessions, on-site massage, nutritional and personal trainer support, with the goal of promoting a balance between personal and professional life, reducing stress and burnout. In addition, the Wellhub and OnHappy benefits are offered to employees and their families, aiming to encourage moments of self-care and well-being.

se·cuida
se·cuida
se·cuida

The occupational health and safety (OHS) management system is not limited to direct employees (under Brazilian labor law - CLT). It covers anyone who performs activities in face-to-face, hybrid, or remote modalities and who is under the control or influence of the contracting establishment, including:

- Employees: Workers with full employment contracts;
- Outsourced: Service providers who operate within the establishment to perform temporary or permanent activities;
- Interns and Apprentices: Workers in vocational training who are exposed to the same risks as the workplace environment at the establishment.

The system covers operational and administrative activities, both routine and non-routine, in the following environments: Offices; Common areas (lunchroom, bathrooms, break areas, outdoor areas, parking lots, etc.); and Virtual/Residential Environment (teleworking spaces according to company policy).

We comply with all occupational health and safety requirements. We implemented a risk management system for employees and contractors (whose workplace is controlled by the organization), based on recognized legislation and standards, with emphasis on:

- NR 05 - Internal Commission for Accident and Harassment Prevention: Election, formation, operation;
- NR 10 - Safety in Electrical Installations and Services: Performing dielectric tests on safety equipment;
- NR 12 - Workplace Safety in Machinery and Equipment: Basic documentation, inventory, and training;
- NR 17 - Ergonomics: Preliminary ergonomic assessment;
- NR 33 - Safety in Confined Spaces: Basic documentation, registration, entry and exit control;
- IT 16 - Emergency Response Plan;
- IT 17 - Fire and Emergency Brigade.

In this regard, we have also implemented:

- Risk Management Program: It embodies occupational risk management through multidisciplinary and systematic actions. Includes: Occupational Hazard Inventory and Action Plan.
- Occupational Health Medical Control Program: A comprehensive set of worker health initiatives, structured based on risk assessments from the PGR (Risk Management Program) and formalized in the Occupational Health Medical Control Program (PCMSO) and Analytical Report.
- Emergency Response Plan (ERP): The embodiment of the entire risk management policy implemented in the establishment's culture, manifested through actions and legal documentation.

This entire occupational health and safety management system was implemented in strict compliance with current legal requirements, whether federal, state, or municipal.

Workplace safety primarily encompasses workers who operate in high-risk environments, such as those in data centers, who work in energized areas; fire brigade members, who need to be constantly trained and ready for any eventuality; and building maintenance teams, who work in various areas and require guidance to perform their work as safely as possible and personal protective equipment in good condition.

We have an on-site clinic staffed by an Occupational Health Nursing Technician who provides emergency care, blood glucose tests, blood pressure checks, wound care, and referrals for medical consultations and urgent care when necessary. Using the information gathered at the clinic, we monitor the main problems faced by workers and, based on this information, plan health and safety initiatives.

We have the CIPA (Internal Commission for Accident and Harassment Prevention), to which workers can report incidents, in addition to the occupational safety technician, who is always available to listen to employees.

Employees have the right to interrupt activities that present a serious and imminent risk to their health and life, by notifying their supervisor (Safe Work Release - LTS). During onboarding, the worker is informed of the risks to which they will be exposed, as well as the control measures in accordance with the guidelines of NR 01.

The processes for investigating workplace incidents/accidents are organized to identify hazards, assess risks, determine corrective measures, and implement improvements to the management system. After an incident/accident occurs, the event is formally recorded by the Safety Technician through an Investigation Report, which pre-determines the cause and details the protective and corrective measures to be adopted.

To encourage the reporting of hazards and ensure protection against retaliation, we have implemented active listening processes. The Specialized Occupational Safety and Health Service (SESMT) and the CIPA (Internal Commission for Accident Prevention) conduct visits and inspections where workers are heard regarding their well-being and perception of accident and harassment risks.

To protect employees, safety information is anonymously recorded in CIPA (Internal Commission for Accident Prevention) minutes and ergonomic reports (AEP). In cases of harassment, workers are advised to report the situation to customer service through our confidential Complaints Channel (canalconfidencial.com.br/lwsa and/or telephone 0800 591 3128).

Hazard identification and risk assessment (routine and non-routine) and the application of the hierarchy of controls to eliminate and minimize them are based on the following tools:

- Environmental Risk Assessment: Periodic assessment to identify, quantify, monitor, and propose solutions for physical, chemical, biological, ergonomic, and accident risks in the workplace, in accordance with the Brazilian Regulatory Standards (NRs).
- Safety Inspections: Periodically conducted by the CIPA (Internal Commission for Accident Prevention) to identify and propose solutions to accident risks and factors that interfere with work, with records in the Meeting Minutes.
- Preliminary Ergonomic Assessment: Applied as needed/due to physical changes to support preventive measures and ergonomic adjustments, using a report based on legal requirements (ISO and e-Social).
- Preliminary Risk Assessment: For non-routine activities, it identifies hazards and defines preventive measures and operational procedures.
- Permit to Work in a Confined Space: Required for activities in locations not designed for continuous occupancy (limited entry/exit, insufficient ventilation and atmospheric hazards), analyzing the activity, environment, equipment and safety measures.

To evaluate and continuously improve the occupational health and safety management system, the results of the risk identification, assessment, and mitigation processes are recorded in the Risk Management Program. This information enhances accident control and prevention procedures.

The results of the PGR also support the monitoring of workers' health by the Occupational Health Medical Control Program (PCMSO), which culminates in the Analytical Report (RA). The PGR also complies with Ordinance No. 2018/2014 generating Tables III (accident report with frequency rate and severity index), IV (occupational diseases) and V (unhealthy working conditions).

The participation and consultation of workers in the occupational health and safety management system, as well as access to relevant information, are continuous and structured. This occurs directly in safety inspections/surveys by the SESMT (Occupational Safety and Health Service) and CIPA (Internal Commission for Accident Prevention) (recorded in relevant documents such as PGR (Risk Management Program) / PCMSO (Occupational Health Medical Control Program) / Meeting Minutes) and indirectly via the Fire and Emergency Brigade.

Both the CIPA (Internal Commission for Accident Prevention) and the Fire and Emergency Brigade also have a communication channel on "Slack," where their members can communicate with workers.

Regarding formal health and safety committees composed of employers and workers, we have the formal presence of the Internal Commission for the Prevention of Workplace Accidents and Harassment (CIPA). This committee is responsible for identifying and monitoring accident risks through safety inspections, monitoring preventive measures proposed by the Occupational Health and Safety Service (SESMT) and improvement actions implemented by the Data Center and Facilities sectors, promoting safety campaigns, participating in the investigation of workplace accidents, monitoring actions determined by the Risk Management Program (PGR) and Occupational Health Control Program (PCMSO), as well as developing and implementing the Internal Week for Accident Prevention (SIPAT).

The Commission's responsibilities are defined in a Work Plan and discussed monthly through regular meetings with the participation of representatives from outsourced companies. Decisions are made by consensus, and requests for adjustments and improvements are formally submitted to the responsible managers.

For these monthly meetings to function properly, the president is responsible for convening the members, coordinating the meetings, keeping the Occupational Health and Safety Service (SESMT) informed about the work being done, and delegating tasks. The vice-president substitutes for the president when the latter cannot be present, delegates responsibilities, and communicates the decisions to all workers at the establishment. The secretary is responsible for attending the meetings, drafting the minutes, and sending out the meeting notices.

Our training strategy includes both general and specific training, tailored to the various functions and risks of the operation:

- CIPA Training: Comprehensive training for commission members, focused on accident investigation, occupational hygiene, social security legislation, inclusion of people with disabilities, and prevention of harassment and violence in the workplace.
- Fire and Emergency Brigade: Theoretical and practical training in firefighting, area evacuation, and first aid.
- Operational Safety (NRs): Periodic training focused on NR 12 (safety in machinery and equipment) and NR 35 (work at height and use of ladders).
- Simulations and Ergonomics: Annual implementation of complete area evacuation drills coordinated by the Occupational Health and Safety Service (SESMT), in addition to ongoing ergonomic guidance for administrative positions.
- Integration and Onboarding: Rigorous "Release for Safe Work" (LTS) processes for third parties and welcome sessions (Onboarding) for new employees, integrating safety standards from their first day at the Company.



SIPAT 2025

Reinforcing our commitment to the physical and mental well-being of our employees, we have carried out the SIPAT 2025 (Internal Week for the Prevention of Workplace Accidents). With a focus on adapting to new work models, the program was structured in a hybrid format, encompassing both in-office and remote workers.

The actions focused on three fundamental areas:

1. **Preventive Health and Ergonomics:** Conducting ergonomic check-ins in workplaces, bioimpedance exams, and eye health campaigns, promoting the prevention of occupational diseases.

2. **Mental Health and Stress Management:** Digital workshops with psychology experts, addressing the recognition of burnout signs and resilience techniques in the corporate environment.

3. **Culture of Prevention and Engagement:** Using playful methodologies and interactive games to disseminate knowledge of first aid and safety standards (NRs), encouraging teamwork and continuous awareness.

NR-01

In line with NR-1 guidelines and the company's commitment to promoting healthy work environments, a mapping of internal initiatives related to the prevention and mitigation of psychosocial risks was carried out in 2025. The work aimed to consolidate, in a structured way, the main risks associated with the work environment and organization, the potential impacts on the health and well-being of employees, as well as existing initiatives for their mitigation.

The analysis considered occupational health risks, such as overload, excessive deadlines, long working hours, and difficulty disconnecting, as well as interpersonal/organizational factors, such as harassment, conflict, poor communication, injustice, and job insecurity. These risks can cause stress, anxiety, depression, burnout, mental fatigue, disengagement, and decreased productivity.

Based on this diagnosis, a survey was conducted of the practices and tools already available in the company that contribute to mitigating these risks, including time management mechanisms, a culture of continuous feedback between leaders and teams, a code of ethics and conduct, a whistleblowing channel, organizational climate surveys, recurring internal communication, and the provision of online and in-person psychological support.

To strengthen the monitoring of these factors, the use of the TeamCulture platform was also defined, which supports the identification and monitoring of psychosocial risks through the structured and periodic collection of perceptions from employees, allowing the tracking of trends and the identification of opportunities for improvement.

This process allows the company to increase visibility into factors that can impact well-being at work and to direct preventive and corrective actions in a more strategic way, reinforcing our commitment to promoting a safe, healthy, and respectful work environment for all people.

Customer Relationship

Over time, our strategy has been to make acquisitions with a very clear vision of adding ever more value to our clients by serving them on all fronts of their business, relying on our solutions - from creating an online store to sell their products, logistics to make their deliveries more competitive, security and convenience of having payment methods - credit card, bank slip, even Pix - within their e-commerce platform.

We differentiate ourselves from the competition by offering native and integrated tools, covering everything from payments to logistics, that simplify the complexity of opening a CNPJ (Brazilian business registration number) and selling online in Brazil. The use of our Artificial Intelligence tools exemplifies this agility: they allow small entrepreneurs to integrate and start selling their products on marketplaces like Mercado Livre or TikTok Shops in just one day, drastically reducing the barriers to entry in digital commerce.

With a focus on innovation, integration, and security, we support the digital ecosystem for businesses, offering solutions for online presence, e-commerce, management, and financial services. We serve approximately 700,000 clients across various sectors, including SMEs and large corporations, connecting technology and business in an efficient and integrated manner.

We participate in the entire digitalization journey of our clients, entrepreneurs, regardless of their segment and size, with the goal of helping businesses to be born and thrive through technology. Our services include e-commerce platforms, ERP, marketplace integration, POS, recurring payments, lead generation, credit, and logistics, among others.

We are present in the customer journey in three areas of operation, in which we must advance in the coming years:

- Omnichannel journey: we help customers who are currently offline to digitize their lives and begin their transition to online, bridging the gap between the two and thereby improving their customer service and the execution of their tasks and processes.
- Financial services: we support our clients by offering working capital products in a fast, efficient, and as unbureaucratic a way as possible, so they can make projects viable, plan expansion, or implement new businesses. We have started offering digital accounts to our clients, another important step in their journey within our ecosystem.
- Logistics: We offer our clients a solutions marketplace where they can automatically find the best service and conditions offered by specifying their desired origin and destination, guaranteeing them security, speed, convenience, and, above all, savings.

Customer Profiles

GRI 2-6 3-3 customer experience

In 2025, approximately 700,000 active customers used our ecosystem of solutions. These are primarily small and medium-sized enterprises operating in various sectors of the economy. The impact of our technologies extends to different agents in the corporate and consumer economy:

- B2B Clients (Retailers and Entrepreneurs): Our main downstream entity, which uses our platforms to enable and professionalize its sales, whether for large retailers or social sellers.
- End Consumers: Our customer's customer. They routinely interact with our technology by benefiting from a secure financial checkout journey and the agile logistics traceability provided by our ecosystem.
- Partner and Operator Ecosystem: We also include agencies and implementers that generate secondary markets by customizing our solutions, as well as delivery drivers and last-mile logistics operators (last mile) that complete the consumption cycle initiated on our platforms.



Customer service channels

The pursuit of customer satisfaction guides all our decisions. Our customer service mission is to deliver solutions to customers in the shortest possible time and with excellent customer relations. In our customer satisfaction survey, we always ask customers to validate this mission. Our customer service operation generates positive impacts, as it actively promotes the digital inclusion of entrepreneurs and strengthens the Brazilian e-commerce ecosystem. We have established rigorous Service Level Agreements (SLAs), which define deadlines and standards of excellence for all interactions, in order to guarantee support for our customers in case of possible system unavailability or support failures.

We currently have four customer service channels: phone, chat, WhatsApp, and tickets. We identify the volume in real time and perform a qualitative analysis of the content of the service requests handled by our analysts. This evaluation is carried out by coordinators, Quality and Training teams, but also through the analysis of service requests by Generative Artificial Intelligence (GenAI).

We verify the effectiveness of our customer service channels through KPIs, cross-referencing internal perspectives with customer satisfaction surveys. This customer evaluation is measured across three pillars, which we have been developing: solution (evaluates the solution provided); speed (evaluates the time the customer waited to be served); and relationship (evaluates the attitude of the professional who served them). The main methodology used to promote continuous improvement is PDCA (Plan, Do, Check, Act).

To measure the efficiency of our customer service, we use the Reclame Aqui (RA) portal. Several units of the group, such as Locaweb, Tray, Vindi, and Kinghost, have the RA1000 seal, a certificate awarded to companies with excellent customer service ratings on the portal. Furthermore, we guarantee that more than 80% of complaints are answered across all our units, with brands like Tray, Bagy, Bling, and Octadesk achieving 100% response rates in their customer service channels or service requests.

Locaweb

In 2025, in our customer service satisfaction survey, we achieved a solution score of 72 points, using the same NPS methodology scale, which ranges from -100 to 100. This means that, out of the 101,784 satisfaction surveys we conducted in 2025, 84,000 (82%) customers gave us a score of 9 or 10 for the solution delivered by our Customer Service team.

In addition to customer feedback collected through our satisfaction surveys and NPS, we use artificial intelligence to analyze chat and WhatsApp interactions, identifying opportunities for improvement in our customer service and products. Based on this analysis, our Quality team then forwards these opportunities to the responsible departments.

Certified with the RA1000 seal, Locaweb responded to 96.2% of complaints received in the last 6 months and became a five-time winner of the Reclame Aqui Award, attesting to our commitment to providing the best possible service. Reflecting this culture, we have established clear goals for the 2026 cycle, aiming to operate consistently with excellence.



Promoting entrepreneurship

Our mission is to support entrepreneurship in Brazil, recognizing it as an essential path for the development, creation, and expansion of new businesses. We believe that entrepreneurship is fundamental for job creation and sustainable economic growth.

Key programs focused on entrepreneurship:

- Octa *Ensina*: Octadesk's learning platform focused on developing customer service teams, offering practical content such as training, webinars, and materials to enhance the customer experience. It's a way for companies to invest in the knowledge and development of their employees, especially those involved in customer service.

- E-commerce School: provides a portal of free content for SMEs, with over 2,000 articles and 100,000 monthly visits. As the client progresses on their journey of discovery and learning, we begin to introduce Tray and its entire ecosystem, strengthening our sales intelligence. Exclusive courses for clients: we combine our practical course platform, E-Tray, and our strategic course platform, E-comClass, to provide the knowledge the client needs to succeed.

- TechLab: Created in 2012 as an in-person event, the project went through different phases throughout its history. In 2015, the initiative was transformed into an online platform for on-demand content and, from then until 2025, was known as Conexão KingHost. In 2026, the platform entered a new phase and became known as TechLab, with free content aimed especially at agencies and developers. The new positioning reinforces the focus on materials that support the evolution of digital projects with greater performance, autonomy, and efficiency. In 2025, more than 1,000 enrollments were made and more than 800 courses were completed.

- Bling Academy: is a learning platform developed by Bling, with the goal of empowering entrepreneurs, shop owners, and users of the Bling system to manage their businesses, from opening a company to scaling sales, and in the efficient use of the business management tool. Through educational materials, Bling Academy offers content that helps in the day-to-day running of the business and on topics that every entrepreneur needs to know, also teaching about the functionalities of the system.

Democratization of E-commerce

Our commitment to helping businesses start and thrive has materialized in strategic alliances. Tray and Bling have formed a pioneering partnership with TikTok Shop in Brazil, integrating SME inventories directly into the social network. This initiative democratizes access to new sales channels with high engagement, allowing for rapid growth for our merchants.

To reinforce Bling's positioning as the management platform "that has everything an entrepreneur needs," we launched marketing campaigns and training programs. In addition, Bling integrated with the Beleza na Web marketplace, automating inventory and invoicing for SMEs in the beauty sector. It also promoted training programs for retailers wishing to operate on Amazon. The topics covered included: choosing sales channels, product registration and management, profitable pricing, inventory control, invoice issuance, and promotional and performance strategies during events.

This ecosystem gains even more traction with the native unification of Melhor Envio within Bling and other platforms (such as Bagy for small stores), simplifying logistics operations and reducing shipping costs, a factor cited by 48% of consumers as decisive in the online shopping journey.

Supply chain

We ensure that all potential suppliers and service providers have equitable access to information during the quotation and bidding processes. It is essential that our business relationships reflect the legitimate interests of both parties and are strictly based on technical parameters.

We strongly reject any undue advantage gained through manipulation of information, or through practices such as intimidation, coercion, or duress the artificial creation of dependence of one party on another. Unfair competition practices or situations that constitute a conflict of interest with our business are not tolerated.

LWSA requires its business partners to reflect our ethical commitments. This is operationalized through a pre-partner assessment to identify risks of corruption or human rights violations prior to engagement. We have a mandatory Term that extends compliance obligations beyond the organization's boundaries, in addition to periodic checks of sanctions lists and negative media to ensure that business relationships remain aligned with our sustainable values.

Know Your Supplier (KYS): To support decision-making in the hiring of strategic suppliers, we use the Know Your Supplier (KYS) methodology. Through a specific platform, commercial, financial, and compliance reports are submitted. Thus, the approvals consider not only these indicators but also the three pillars of ESG, which include an ethical and socially responsible stance, in order to avoid favoritism and privileges in the relationships we establish.

Our commitment is to monitor any violations of human rights or corrupt practices in our supply chain, ensuring compliance with current legislation and regulations.

Our suppliers must, above all:

(i) be reputable; (ii) unequivocally comply with applicable laws and regulations, as well as with our rules, codes, policies and procedures; (iii) not to use child labor or forced labor; and (iv) observe the confidentiality of our own information, as well as that of our clients, partners and employees.

In accordance with the Related Party Transactions and Conflict of Interest Policy, any significant shareholding held by directors or employees in suppliers, clients, or partners must be declared and reported to the Audit Committee. To ensure impartiality, LWSA has a general rule prohibiting employees from participating in decision-making processes regarding the contracting of suppliers and service providers with companies that have, as partners or directors, individuals with whom they have a family relationship. Situations characterized as conflicts of interest with the Company's business are not permitted in relationships with suppliers.

Given the inherently digital nature of our ecosystem, our supply chain consists of strategically selected partners to ensure maximum availability, security, and scalability of our solutions. We have structured our chain into four vital supply categories:

1. Infrastructure and Technology Providers: This includes global public cloud partners (Hyperscalers), hardware suppliers for our data centers, and power providers - a critical input for our operations, with a focus on the continuous transition to renewable energy sources.

2. Logistics Partners: Essential to our Melhor Envio vertical, they encompass road and air transport companies, including the country's main private carriers.

3. Financial Institutions and Payment Networks: They operate in synergy with our financial solutions (Vindi), encompassing banks, card brands, and security and anti-fraud biometric providers.

4. Intellectual Capital and Software: Includes consulting firms and technology companies that complement our R&D area, as well as productivity and security software providers that support our internal operations.

Relationship with the community

LWSA goes beyond simply supporting clients in their business needs. We promote educational initiatives aimed at community development, encouraging training and professional growth, with the potential for future hiring within the company.

We invest in initiatives that connect technology and entrepreneurship, facilitating entry and professional development in the job market. These initiatives generate positive impacts for individuals, families, and communities. Examples include supporting female entrepreneurship through established sponsorship programs and incentives for new ideas.

Our goal is to contribute to reducing disparities through an inclusive educational experience. Beyond technical development, we seek to build a support network that promotes people's professional careers in an equitable and diverse way.



Digital inclusion

We promote digital inclusion initiatives for employee development, customer support, and boosting education and employability for young people. We believe in education as an essential tool for reducing inequalities. We encourage new ideas, with the purpose of expanding opportunities and generating a positive impact.

In 2025, we held the 3rd edition of Conectaê, a social project aimed at training young people aged 15 to 17 who are under the care of the Institutional Shelter Service for Children and Adolescents (Saica). The initiative aims to expand the employability and development opportunities of these young people through a training path focused on digital skills and socio-emotional abilities.

The 2025 edition featured 24 young participants and an enhanced training track, with content on digital literacy, digital marketing, and soft skills. The training consisted of 87 hours of coursework, distributed across live classes twice a week over six months and five in-person immersion sessions lasting seven hours each.

One of the program's main highlights was the engagement of volunteer company employees, who acted as mentors to the young people throughout the entire journey. In total, 48 employees participated as volunteer mentors, accompanying the young people throughout the training process. Each participant had two mentors, who held one-hour mentoring sessions every 15 days, focusing on career guidance, skills development, and expanding their knowledge of the world of work.

To ensure the quality of the mentoring, the mentors also participated in preparatory training and calibration meetings throughout the program, strengthening the mentoring process and aligning the approaches used in the development of the young people. Throughout the program, the initiative generated 224 hours of corporate volunteering.

As a result, 80% of the young people completed the program, and 15% entered the job market after participating in the project, reinforcing the initiative's potential to support the employability and professional development of vulnerable youth.

In addition to training the participants, Saica's technicians also received training in three sessions focusing on diversity and communication, expanding the project's impact on the youth support ecosystem.

Social responsibility

LWSA directs its social responsibility initiatives through the Private Social Investment Guidelines and Premises. This document guides the allocation of resources and social partnerships of the Company, seeking to amplify the positive impact of the supported initiatives and strengthen their connection with the ESG strategy and the long-term commitments established by the organization.

Based on these guidelines, we began to prioritize projects and actions aligned with our business model and the material themes identified in our dual materiality matrix, reinforcing the Company's commitment to the social and economic development of the communities with which we interact.

The analysis and approval of initiatives eligible to receive institutional support, whether through sponsorships, partnerships, or the granting of Company products and services, are conducted by the People, Culture, and ESG departament. The objective is to support projects that contribute to the development of people, expand income-generating opportunities, and strengthen entrepreneurship. The principles guiding our social investment are connected to the Sustainable Development Goals (SDGs).

Based on these commitments, we structured our social initiatives around four main pillars:

- Education and training: Support for initiatives that broaden access to knowledge and professional training (SDGs 4, 8 and 17);
- Promoting entrepreneurship: Stimulating income generation and strengthening small businesses, especially in underrepresented communities and groups (SDGs 1, 5, 8 and 10);
- Digital inclusion: expanding access to technology and digital tools that enable educational and professional development (SDGs 1, 4, 8, 9 and 17);
- Reducing social inequalities: Support for initiatives that contribute to greater social equity and access to opportunities (SDGs 5, 10 and 16).



Relationship with the community

LWSA's headquarters are located in the city of São Paulo, near the Peinha Community in the South Zone. We maintain an ongoing relationship with community leaders through regular meetings, with the aim of strengthening dialogue and identifying opportunities for collaboration.

Among the initiatives developed with the community are social support actions, such as the annual donation of basic food baskets, which in 2025 benefited 200 families in the region. The activity involved the participation of 10 volunteer employees, promoting integration between corporate volunteering and the company's social impact actions.

We also support community events and local sports and cultural activities, including initiatives aimed at children, youth, and adults in the community.

Entrepreneurship and income generation

Promoting entrepreneurship is one of the pillars of our private social investment, especially due to its connection with the Company's core business.

In this context, we strengthened our partnership with the organization Empreende Aí, an initiative focused on training entrepreneurs from underprivileged areas. In 2025, we supported a group of 160 Afro-Brazilian women entrepreneurs, contributing to expanding access to entrepreneurial training and the development of small businesses.

The program consisted of 80 hours of in-person classes, directly impacting 50 entrepreneurs, with 10 businesses receiving awards at the end of the training.

LWSA's support included:

- Provision of a space with complete infrastructure for conducting the course;
- Participation of company representatives on the evaluation panel for the final projects;
- Provision of free accommodation for one year for participants;
- Access to Tray's E-commerce School, expanding opportunities for digital business development.

Inclusion and social impact

In addition to initiatives focused on income generation, LWSA also supports actions with social impact and inclusion.

In partnership with the Ana Maria Senior Citizens' Center (NCI), activities focused on well-being and intergenerational interaction were promoted, including visits by seniors to the company for physical activities and moments of integration. The partnership also included an awareness campaign on violence against women, highlighting data related to violence against elderly women.

Another relevant initiative was the support for improving the accessibility of the Company's Whistleblowing Channel. The ESG team, with support from the disability affinity group of the Inclusion and Diversity Committee, participated in the testing phase of the platform's new functionality. In total, 26 employees participated voluntarily, contributing to usability testing and communication review to ensure greater accessibility for people with disabilities.



Environmental management

Energy

GRI 302-1, 302-4

Energy consumption (GJ)

		2024	2025
Headquarters / Data Center	Non-renewable fuels (diesel)	2,165.50	1,704.00
	Electricity consumption from the free market (renewable energy)	54,364.97	50,268.96
	Total energy consumption (Headquarters/data center)	**56,530.47**	**51,972.96**
Business units (BUs)	Non-renewable fuels	-*	19.67
	Electricity consumption from the free market (non-renewable)	-*	1530.17
	Total energy consumption (BUs)	**-***	**1,549.84**

Note: The base year is used to calculate energy consumption reductions. This calculation is based on the total monthly energy bill for the months of 2023. *In 2024, only information from the headquarters and data center was released, as these are the most representative values for energy consumption.

In environmental management, our attention is primarily focused on the high consumption of electricity due to the activity we develop as a technology ecosystem, especially due to the constant use and need for cooling of our own data center.

The integration of energy and water use into the overall strategic planning of our data centers is structured. The focus is on cost efficiency and the transition to renewable energy sources.

The energy strategy is based on operating in the Free Electricity Market (MLEE) since 2016, aiming for predictability, freedom of choice of suppliers, and cost reduction.

Since 2023, all energy consumption at LWSA headquarters and the Data Center has been purchased from renewable energy sources (solar, wind, biomass and small hydroelectric plants).
In 2025, we advanced the decarbonization of our operations with the acquisition of Renewable Energy Certificates (I-RECs) to fully cover the energy demand of our headquarters and data center. With this measure, the company ensures the traceability of the energy consumed and meets the established goals for reducing its operational carbon footprint.

The environmental practices and factors applied to our headquarters and data center include:

• Energy Efficiency: The company is adopting a gradual replacement of old equipment with newer models that have greater processing capacity and lower energy consumption.

• Input Management: The shift to renewable energy sources (incentivized energy) and the exemption from tariff flags through the Free Market.

Our focus in data center management is to maintain the excellence of existing processes. We adopt best practices for infrastructure equipment maintenance to ensure they remain within their useful life. Preventive maintenance reports are submitted to internal audits monthly. Annually, an external on-site audit is conducted as part of the ISAE 3402 certification process.

We rely on diesel-powered electric generators, which provide a redundant power source in case of a main power failure. This ensures that the data center can continue operating even during prolonged power outages from the electrical grid. IT and Data Center Operations Managers are responsible for ensuring that the generators are regularly tested and properly maintained, and that they are ready for use when needed.

Cost reduction

We began purchasing electricity on the Free Electricity Market (MLEE) in September 2016. The main benefit of joining the Free Electricity Market is cost reduction, because energy is purchased directly from the supplier, making the price more competitive than the regulated market and, in most cases, more attractive. Generally, purchasing energy on the Free Market allows for savings of 10% to 20% on the electricity bill, and also exempts you from variable energy surcharges.

Reducing energy consumption costs (Opex) is directly related to LWSA's financial balance, which involves a range of stakeholders. Furthermore, operational resilience is fundamental for all stakeholders, as it can create long-term value for the Company and ensure business continuity, our reputation, customer satisfaction, financial stability, and regulatory compliance. There is no specific risk that could directly impact the Company regarding climate issues. However, it is worth noting that LWSA has mapped the risk of power outages.

Climate change and, consequently, meteorological events, directly affect the supply of energy services through changes in the availability and reliability of generation sources, such as hydroelectric plants. This factor can lead to increased energy costs and reduced accessibility, impacting the Company's financial planning. We understand that investing in operational resilience is fundamental to mitigating risks and minimizing disruptions. Therefore, our executives and shareholders are involved in strategic decision-making related to investments in backup energy infrastructure. They can provide the necessary financial support to ensure that the data center has the adequate resources to handle power outages.

Mitigation and adaptation to climate change

GRI 305-1, 305-2, 305-3

Total GHG emissions, by scope (tCO_2e)

Scope	2023	2024	2025
Scope 1[2]	182,27	249,38	112,42
Scope 2 (location)[3]	611,76	845,39	652,93
Scope 2 (Purchase choice)[3]	-	-	19,52
Scope 3[4]	943,29	2.063,16	5.811,06

Note [1]: The consolidation approach was operational control. The methodology used was that of the Brazilian GHG Protocol Program, and the IPCC Fifth Assessment Report (AR5) was used as the source of the GWP.

Note [2]: The gases included in the calculation are: CO_2, CH_4, N_2O, and HFCs.

Note [3]: The gases included in the calculation are: CO_2, CH_4, and N_2O. The purchase selection methodology was adopted in 2025 through the purchase of I-RECs.

Note [4]: The gases included in the calculation are: CO_2, CH_4, and N_2O. In 2025, the emission of scope 3 gases did not necessarily increase, but rather the mapping of the upstream Transportation category was expanded, encompassing all product deliveries made by the Melhor Envio unit, through the consolidation of the data collection methodology.

Striving for carbon neutrality in our operations is one of our commitments, reflecting our dedication to sustainability, environmental preservation, and climate change mitigation.

Our focus is on the following steps:

- Emissions reduction: identifying measures to decrease our own carbon emissions, such as improvements in energy efficiency, adoption of cleaner technologies, and investments in renewable energy, for example.

- Carbon offsetting: Even after reducing domestic emissions, it can be difficult to completely eliminate all carbon emissions. In these cases, we invest in carbon offsetting projects, such as reforestation, forest conservation, carbon capture and storage, or financing renewable energy projects.

It is important to note that, although the Company does not present specific emissions reduction targets, this does not mean that it is not committed to environmental sustainability. We seek to adopt a more comprehensive perspective for environmental management, such as the implementation of energy efficiency practices and investments in renewable energy, even without establishing specific numerical targets.

Furthermore, we are part of the ICO2 B3 index portfolio, which demonstrates LWSA's commitment to efficiency in Greenhouse Gas (GHG) emissions and to adopting management practices that lead to greater efficiency in these emissions, contributing to the advancement of the transition to a low-carbon economy.

In 2025, LWSA offset the GHG emissions related to Scopes 1, 2, and 3 of its 2024 activities. In total, 3,158 tons of CO_2e were offset using Reducing Emissions from Deforestation and Forest Degradation (REDD) credits.

The offset was achieved through verified emission reductions generated by the REDD+ Jari Amapá Project (VCS ID 1115), certified by Verra, with validation and verification according to VCS (Verified Carbon Standards) and CCB (Climate, Community & Biodiversity) Standards. This project is recognized with a Gold level seal in the Biodiversity category, highlighting its excellence in environmental and social benefits.

The REDD+ Jari Amapá Project, located on private land in Amapá, manages over 117,000 hectares and is the first of the largest carbon program on private land in the world (REDD+ Jari Valley Program). It combines sustainable forest management and agro-extractive practices to conserve the forest and promote social development.

The project strengthens regional production chains, improves food security, and generates income for families in the Jari Valley. In addition to protecting 343 species of fauna (six of which are threatened) and 350 species of flora (many endemic), it contributes to the Sustainable Development Goals (SDGs), focusing on sustainable food production and agroforestry systems.

Environmental Management

At the heart of the environmental pillar of our ESG strategy, we prioritize the intelligent management of resources and the mitigation of impacts. Since 2022, our Social and Environmental Responsibility Policy has guided the operations of all companies in the ecosystem, establishing rigorous guidelines that integrate environmental sustainability, social commitment, people management, and inclusion and diversity.

In practice, we carry out several actions, such as the proper disposal of electronic materials through duly authorized companies, prioritizing the reuse of obsolete equipment or, when possible, its refurbishment for donation to charities, always in accordance with our Donations and Sponsorships Policy. To ensure information security during this process, we have adopted strict protocols for data erasure, demagnetization, and destruction of defective disks, protecting the assets of clients and employees. Additionally, we promote selective waste collection in our facilities, mitigating contamination risks and reinforcing our commitment to environmental preservation and environmentally sound final disposal.

CDP

The Carbon Disclosure Project (CDP) is an international non-profit organization considered the leading initiative in the financial sector regarding climate change mitigation. In 2025, we participated, for the fourth consecutive time, in the reporting cycle, being recognized with a D score, which represents the initial stage of environmental disclosure. This result positions us among the companies that have begun their journey towards climate transparency, specifically within the Marketing and Web Services category. Participation in the CDP allows us to measure our environmental impact and gain a competitive advantage over investment funds that research the CDP score before investing. Furthermore, the CDP connects shareholders and companies to leverage businesses related to mitigating global warming; maps the biggest causes of greenhouse gas emissions, establishing a global standard for reporting on greenhouse gas emissions and energy use; provides transparency to our activities for clients and shareholders; and identifies new risks in the value chain.

Water Resources Management

GRI 303-1

LWSA recognizes the importance of efficient water management, although its operations have a low direct impact on this resource. Within the company, this management is integrated into operational planning, with a primary focus on the maintenance of infrastructure and air conditioning systems. Our water intake at the company headquarters is carried out through artesian wells. The total volume of water consumed at the headquarters in 2025 was 2596 m³.

Planning regarding water resources is geared towards administrative activities and focused on the efficient maintenance of the data center's cooling systems, which are essential for operation. To ensure that equipment functions correctly and piping remains in good condition, we use an air conditioning system that cools the water in a closed circuit with the aid of outside air (air-cooled chillers).

To maintain the internal cleanliness of this system, we perform a controlled disposal procedure of a small amount of water (called purging) to renew the chemical treatment. This process is rigorously monitored.

> Every five days, the system is cleaned for just one minute, releasing 15 liters of water.

> This technical precision results in an annual replenishment of approximately 1,080 liters, ensuring that water usage is strictly limited to what is necessary for the safety of the infrastructure.

Currently, the company does not identify significant environmental impacts generated by its activities or in its value chain, since the volume of use is considered low for the scale of our operations. All effluent discharge is directed to public sewage treatment plants.

Although the organization does not have operations in areas globally classified as perennial water stress zones, we closely monitor the situation in the São Paulo Metropolitan Region.

Economic and operational performance

Operational Performance

Building sustainable results requires significant operational growth coupled with a relentless pursuit of efficiency. The year 2025 was extremely positive for the Company, marked by consistent growth and double-digit growth (+10.3% compared to 2024), reaching consolidated Net Revenue of R$ 1,488.5 million[1]. This result is a crucial factor reflecting the mature evolution of our ecosystem and the increased monetization capacity of our customer base. This reinforces our position as an essential ecosystem in Brazilian e-commerce, where we hold a market share of over 20%.

In the second year of consolidating the LWSA brand, we achieved significant gains in productivity and greater operational efficiency. This profitability was driven by strategic post-acquisition management. After the initial stabilization phase of the acquired companies, we moved towards reducing operational overlaps and capturing synergies, integrating teams and brands without destroying our delivery capacity. In addition, operational leverage, with revenue growing at a rate higher than expenses, was crucial for cost dilution and margin expansion.

This pursuit of greater efficiency has guided our capital allocation discipline. Our portfolio restructuring in 2025, which included the sale of assets such as Squid and Nextios, was a move strictly aligned with our strategic proposition of maintaining highly profitable operations. We decided to divest from operations with lower synergies to focus our efforts and resources on expanding the ecosystem's structural margins.

Our operational indicators continued to show growth above market averages. We ended 2025 with a base of 206,300 paying subscribers on our e-commerce platform, a growth of 6.8% compared to the previous year. The GMV of the LWSA ecosystem reached the impressive mark of R$ 79.5 billion, a result 14.1% higher than in 2024, representing a significant share of Brazilian e-commerce.

In 2025, the TPV (total payment volume) was R$ 8.9 billion, representing a 17.7% increase compared to 2024. This result was primarily driven by the accelerated capture of synergies between the acquired companies, and by the increased penetration of our payments solution within GMV.

At Wake, our enterprise e-commerce platform operation, we've advanced our strategy of acquiring new customers, bringing on board important brands like Inbrands, Shoulder, Shop2gether, and OQVestir. The unit has matured as a strategic partner for those seeking scale, proving the value of Real Unified Commerce through a cutting-edge technological architecture ready for high volumes.

[1]Note: Net Accounting Revenue: R$ 1,488.50 Comparable Net Revenue: R$ 1,418.20

Main operational indicators (R$ millions)

	2024	2025	variation
Number of platform subscribers (thousands)	193.2	206.3	6.8%
GMV of the ecosystem	69,664.0	79,509.8	14.1%
TPV	7,581.7	8,922.7	17.7%

The year 2025 was also marked by important developments in our products, bringing greater value to our customers. We expanded the reach of our e-commerce platforms to a complete omnichannel solution, integrating the digital and physical (offline) worlds through the launch of an integrated POS (software) system, with the possibility of unified payment capture and logistics.

Realizing the synergy of the ecosystem, in 2025 we launched the native logistics solution in Bling, built directly on Melhor Envio's infrastructure. This integration eliminates the need for separate contracts, allowing entrepreneurs to manage their logistics operation seamlessly within their own ERP, simplifying processes and reducing costs.

Economic Performance

GRI 201-1

We had exceptional financial results in 2025, driven by increased profitability, operational leverage gains, and the continuous capture of efficiencies throughout the year. The Company's Adjusted EBITDA Margin reached 22.1%, representing an increase of 1.3 percentage points compared to the previous year, with an adjusted EBITDA of R$ 329.7 million.

In addition to profitability, the period was marked by robust cash generation. We achieved a Free Cash Flow of R$ 224.8 million (15.1% margin), equivalent to a high-single/low-double-digit FCF Yield. This financial strength not only guarantees the business's long-term viability but also allows us to distribute more cash and generate more direct value for our shareholders, as evidenced by our strong share buyback program and dividend payments during the period.

R$ 329.7 million

The Company's Adjusted EBITDA Margin reached 22.1%

Direct economic value generated and distributed (R$ thousands)

Metric	2023	2024	2025
Direct economic value generated	1,292,756	1,370,032[1]	1,488,531
Net revenue	1,292,756	1,370,032[1]	1,488,531
Economic value distributed	661,218	727,161	648,287
Personnel (remuneration and benefits)	478,748	476,819	491,749
Taxes, fees and contributions	151,655	210,342	127,938
Remuneration of third-party capital	0	0	0
Dividends and Interest on equity	30,815	40,000	28,600
Retained economic value	631,538	642,871	840,244

[1] Net accounting revenue

Performance by business

Highlights:

+10,3 % increase in Comparable Net Revenue in 2025.

+15,3 % increase in subscription revenue from commerce platforms in 2025.

Net operating revenue / R$ millions

Historical Summary	2024	2025	Variation
Reported Net Revenue	1,370.0	1,488.5	8.65%
Comparable Net Revenue[1]	1,286.0	1,418.2	10.28%
Commerce Reported Net Revenue	950.0	1,073.2	12.96%
Commerce Comparable Net Revenue[1]	881.7	1,017.0	15.34%
Commerce Share of Consolidated Total	69.3%	72.1%	2.8 p.p
BeOnline/SaaS Reported Net Revenue	420.0	415.4	-1.11%
Comparable Net Revenue[1]	404.2	401.2	-0.75%
BeOnline/SaaS Share of Consolidated Total	30.7%	27.9%	- 2.8 p.p

Commerce subscriber base | in thousands

Category	2024	2025	Variation
Subscriber Base	193.2	206.3	6.8%

Eop Customers – BeOnline/SaaS

Category	2024	2025	Variation
EOP Customers	390.6	389.4	-0,3%

Appendices

Collaborators

GRI 2-7, 2-8

Employee information, by type of employment contract and gender.

Type of Contract	Gender	2023	2024	2025
Permanent	Men	2,289	2,173	2,047
	Women	1,524	1,411	1,336
	Total	**3,813**	**3,584**	**3,383**
Temporary	Men	30	20	0
	Women	3	2	0
	Total	**33**	**22**	**0**

Employee information, by job type and gender

Type of Work	Gender	2023	2024	2025
Non-guaranteed hours	Men	381	347	0
	Women	230	199	0
	Total	**611**	**546**	**0**
Full-time	Men	1,938	1,846	2,047
	Women	1,297	1,214	1,336
	Total	**3,235**	**3,060**	**3,383**
Part-time	**Total**	**0**	**0**	**0**

Employee information, by type of employment contract and region

Category	Region	2023	2024	2025
Permanent	North	19	18	16
	North East	146	127	124
	Central-West	56	47	40
	South	1,177	1,037	992
	Southeast	2,415	2,355	2,211
	Abroad	1	0	0
Temporary	South	6	3	0
	Southeast	27	19	0
	Total	**33**	**22**	**0**

Employee information, by job type and region

Type of work schedule	Region	2023	2024	2025
Non-guaranteed hours	North East	8	10	0
	Central-West	3	3	0
	South	173	156	0
	Southeast	427	377	0
	Total	**611**	**546**	**0**
Full-time	North	19	18	16
	North East	138	117	124
	Central-West	53	44	40
	South	1,010	884	992
	Southeast	2,014	1,997	2,211
	Abroad	1	0	0
	Total	**3,235**	**3,060**	**3,383**

Average number of training hours per employee, by gender.

Gender	2023		2024		2025	
	Total hours	Average number of hours	Total hours	Average number of hours	Total hours	Average number of hours
Men	-	3.32	-	2.53	-	13.61
Women	-	3.00	-	3.44	-	13.93
Total training hours	**9,719**	**-**	**4,011**	**-**	**56,063.00**	**-**

Average number of training hours per employee, by job category.

Functional category	2023 Total hours	2023 Average hours	2024 Total hours	2024 Average hours	2025 Total hours	2025 Average hours
Analyst I	3,869.5	3.33	907.0	2.61	21,081	13.93
Analyst II	1,760	3.92	348.5	3.35	10,522	15.57
Analyst III	692.5	3.64	627.0	3.16	6,187	14.59
Apprentice	31.5	1.31	37	3.36	792	15.23
Assistant	241	3.3	58	2.72	4,277	11.5
Auxiliary	31	2.82	2	1	428	17.10
Coordinator	363	3.42	511	3.13	4,150	12.43
Director	971.2	2.97	31	6.2	179	6.63
Specialist	38.5	3.21	400	3.74	4,282	13.51
Intern	308	2.73	285.5	2.97	1,210	18.62
Manager	204	2	334	3.44	2,000	9.9
Technical leader	1,089	2.52	4.5	2.25	689	11.67
Supervisor	84.5	3.38	0	0	259	23.56
Vice President	35	2.92	0	0	7	2.28
Total training hours	**9,687**	**-**	**4,011.5**	**2.94**	**56,063**	**13.32**

Note: In 2025, data from the Conecta corporate learning platform was considered. In previous years, we had not included this data. Furthermore, we have improved the way we report data for the group as a whole.

Diversity

GRI 405-1

Percentage of individuals who are members of governing bodies, by gender.

Gender	2023		2024		2025	
	Total	%	Total	%	Total	%
Men	6	75.0%	6	75.0%	7	87.50%
Women	2	25.0%	2	25.0%	1	12.50%
Total	8	100.0%	8	100.0%	8	100.0%

Percentage of individuals who are members of governing bodies by age group.

Age range	2023		2024		2025	
	Total	%	Total	%	Total	%
Under 30 years old	0	0.0%	0	0.0%	0	0.0%
30 to 50 years old	3	37.5%	2	25.0%	3	37.5%
Over 50 years old	5	62.5%	6	75.0%	5	62.5%
Total	8	100.0%	8	100.0%	8	100.0%

Percentage of individuals who are members of governing bodies by color or race.

Color or race	2023		2024		2025	
	Total	%	Total	%	Total	%
Black	0	0.0%	0	0.0%	0	0.0%
Brown	0	0.0%	0	0.0%	0	0.0%
White	8	100.0%	8	100.0%	8	100.0%
Indigenous	0	0.0%	0	0.0%	0	0.0%
Asian descent	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	8	100.0%	8	100.0%

Percentage of employees by job category, by gender

Functional category	Gender	2023		2024		2025	
		Total	%	Total	%	Total	%
President	Men	1	100.0%	1	100.0%	1	100.0%
	Women	0	0.0%	0	0.0%	0	0.0%
	Total	1	100.0%	1	100.0%	1	100.0%
Vice President	Men	5	100.0%	7	100.0%	6	100.0%
	Women	0	0.0%	0	0.0%	0	0.0%
	Total	5	100.0%	7	100.0%	6	100.0%
Director	Men	43	84.3%	29	72.5%	25	73.5%
	Women	8	15.7%	11	27.5%	9	26.5%
	Total	51	100.0%	40	100.0%	34	100.0%
Manager	Men	150	68.2%	149	72.0%	135	70.0%
	Women	70	31.8%	58	28.0%	58	30.0%
	Total	220	100.0%	207	100.0%	193	100.0%

Technical leader	Men	43	86.0%	48	90.6%	40	85.1%
	Women	7	14.0%	5	9.4%	7	14.9%
	Total	50	100.0%	53	100.0%	47	100.0%
Coordinator	Men	160	55.7%	151	55.9%	149	56.0%
	Women	127	44.3%	119	44.1%	117	44.0%
	Total	287	100.0%	270	100.0%	266	100.0%
Specialist	Men	159	76.8%	191	73.5%	202	71.9%
	Women	48	23.2%	69	26.5%	79	28.1%
	Total	207	100.0%	260	100.0%	281	100.0%
Supervisor	Men	16	41.0%	5	35.7%	5	45.5%
	Women	23	59.0%	9	64.3%	6	54.5%
	Total	39	100.0%	14	100.0%	11	100.0%
Analyst III	Men	282	70.9%	280	67.3%	295	66.1%
	Women	116	29.1%	136	32.7%	151	33.9%
	Total	398	100.0%	416	100.0%	446	100.0%

Analyst II	Men	565	61.9%	489	63.3%	433	61.7%
	Women	348	38.1%	284	36. 7%	269	38.3%
	Total	913	100.0%	773	100.0%	702	100.0%
Analyst I	Men	696	58.0%	561	54.0%	539	54.3%
	Women	503	42.0%	477	46.0%	454	45.7%
	Total	1,199	100.0%	1,038	100.0%	993	100.0%
Assistant	Men	84	38.0%	217	56.7%	165	57.5%
	Women	137	62.0%	166	43.3%	122	42.5%
	Total	221	100.0%	383	100.0%	287	100.0%
Auxiliary	Men	45	40.2%	11	22.4%	5	18.50%
	Women	67	59.8%	38	77.6%	22	81.50%
	Total	112	100.0%	49	100.0%	27	100.0%
Intern	Men	38	48.7%	28	58.3%	17	50.0%
	Women	40	51.3%	20	41.7%	17	50.0%
	Total	78	100.0%	48	100.0%	34	100.0%

Apprentice	Men	26	45.6%	21	52.5%	24	50.0%
	Women	31	54.4%	19	47.5%	24	50.0%
	Total	57	100.0%	40	100.0%	48	100.0%
Total	Men	2,312	60.3%	2,193	60.8%	2,047	60.5%
	Women	1,525	39.7%	1,413	39.2%	1,336	39.5%
	Total	3,837	100.0%	3,606	100.0%	3,383	100.0%

Percentage of employees by job category by age group

Functional category	Age range	2023		2024		2025	
		Total	%	Total	%	Total	%
President	Under 30 years old	0	0.0%	0	0.0%	0	0.0%
	30 to 50 years old	0	0.0%	0	0.0%	1	100.0%
	Over 50 years old	1	100.0%	1	100.0%	0	0.0%
	Total	1	100.0%	1	100.0%	1	100.0%
Vice President	Under 30 years old	0	0.0%	0	0.0%	0	0.0%
	30 to 50 years old	4	80.0%	6	85.7%	6	100.0%
	Over 50 years old	1	20.0%	1	14.3%	0	0,0%
	Total	5	100.0%	7	100.0%	6	100.0%
Director	Under 30 years old	0	0.0%	0	0.0%	0	0.0%
	30 to 50 years old	43	84.3%	33	82.5%	30	88.2%
	Over 50 years old	8	15.7%	7	17.5%	4	11.8%
	Total	51	100.0%	40	100.0%	34	100.0%

Manager	Under 30 years old	21	9.6%	10	4.8%	11	5.7%
	30 to 50 years old	188	85.5%	186	89.9%	168	87.0%
	Over 50 years old	11	5.0%	11	5.3%	14	7.3%
	Total	220	100.0%	207	100.0%	193	100.0%
Technical leader	Under 30 years old	8	16.0%	8	15.1%	4	8.5%
	30 to 50 years old	42	84.0%	44	83.0%	42	89.4%
	Over 50 years old	0	0.0%	1	1.9%	1	2.1%
	Total	50	100.0%	53	100.0%	47	100.0%
Coordinator	Under 30 years old	69	24.0%	50	18.5%	40	15.0%
	30 to 50 years old	213	74.2%	217	80.4%	222	83.50%
	Over 50 years old	5	1.7%	3	1.1%	4	1.50%
	Total	287	100.0%	270	100.0%	266	100.0%
Specialist	Under 30 years old	50	24.1%	56	21.5%	51	18.2%
	30 to 50 years old	153	73.9%	200	76.9%	225	80.1%
	Over 50 years old	4	1.9%	4	1.5%	5	1.8%
	Total	207	100.0%	260	100.0%	281	100.0%

Supervisor	Under 30 years old	17	43.6%	6	42.9%	5	45.5%
	30 to 50 years old	22	56.4%	8	57.1%	6	54.5%
	Over 50 years old	0	0.0%	0	0.0%	0	0.0%
	Total	39	100.0%	14	100.0%	11	100.0%
Analyst III	Under 30 years old	141	35.4%	128	30.8%	128	28.7%
	30 to 50 years old	254	63.8%	286	68.8%	318	71.3%
	Over 50 years old	3	0.8%	2	0.5%	0	0.0%
	Total	398	100.0%	416	100.0%	446	100.0%
Analyst II	Under 30 years old	497	54.4%	365	47.2%	299	42.6%
	30 to 50 years old	412	45.1%	401	51.9%	393	56.0%
	Over 50 years old	4	0.4%	7	0.9%	10	1.4%
	Total	913	100.0%	773	100.0%	702	100.0%
Analyst I	Under 30 years old	761	63.5%	613	59.1%	554	55.8%
	30 to 50 years old	426	35.5%	419	40.4%	433	43.6%
	Over 50 years old	12	1.0%	6	0.6%	6	0.6%
	Total	1,199	100.0%	1,038	100.0%	993	100.0%

Assistant	Under 30 years old	146	66.1%	270	70.5%	206	71.8%
	30 to 50 years old	73	33.0%	108	28.2%	77	26.8%
	Over 50 years old	2	0.9%	5	1.3%	4	1.4%
	Total	221	100.0%	383	100.0%	287	100.0%
Auxiliary	Under 30 years old	68	60.7%	27	55.1%	12	44.4%
	30 to 50 years old	36	32.1%	15	30.6%	10	37.0%
	Over 50 years old	8	7.1%	7	14.3%	5	18.5%
	Total	112	100.0%	49	100.0%	27	100.0%
Intern	Under 30 years old	70	89.7%	44	91.7%	32	94.1%
	30 to 50 years old	8	10.3%	4	8.3%	2	5.9%
	Over 50 years old	0	0.0%	0	0.0%	0	0.0%
	Total	78	100.0%	48	100.0%	34	100.0%
Apprentice	Under 30 years old	57	100.0%	40	100.0%	48	100.0%
	30 to 50 years old	0	0.0%	0	0.0%	0	0.0%
	Over 50 years old	0	0.0%	0	0.0%	0	0.0%
	Total	57	100.0%	40	100.0%	48	100.0%

Total	Under 30 years old	1,905	49.6%	1,617	44.8%	1,390	41.1%
	30 to 50 years old	1,874	48.8%	1,929	53.5%	1,934	57.2%
	Over 50 years old	58	1.5%	60	1.7%	59	1.70%
	Grand total	3,837	100.0%	3,606	100.0%	3,383	100.0%

Percentage of employees by job category by color or race

Functional category	Color or race	2023		2024		2025	
		Total	%	Total	%	Total	%
Board Member	Black	0	0.0%	0	0.0%	0	0.0%
	Brown	0	0.0%	0	0.0%	0	0.0%
	White	8	100.0%	7	100.0%	7	100.0%
	Indigenous	0	0.0%	0	0.0%	0	0.0%
	Asian descent	0	0.0%	0	0.0%	0	0.0%
	Total	8	100.0%	7	100.0%	7	100.0%

President	Black	0	0.0%	0	0.0%	0	0.0%
	Brown	0	0.0%	0	0.0%	0	0.0%
	White	1	100.0%	1	100.0%	1	100.0%
	Indigenous	0	0.0%	0	0.0%	0	0.0%
	Asian descent	0	0.0%	0	0.0%	0	0.0%
	Total	1	100.0%	1	100.0%	1	100.0%
Vice President	Black	0	0.0%	0	0.0%	0	0.0%
	Brown	0	0.0%	0	0.0%	0	0.0%
	White	5	100.0%	6	100.0%	5	100.0%
	Indigenous	0	0.0%	0	0.0%	0	0.0%
	Asian descent	0	0.0%	0	0.0%	0	0.0%
	Total	5	100.0%	6	100.0%	5	100.0%

Director	Black	0	0.0%	1	2.5%	1	2.94%
	Brown	3	5.88%	1	2.5%	0	0.0%
	White	43	84.31%	35	87.5%	30	88.24%
	Indigenous	0	0.0%	0	0.0%	0	0.0%
	Asian descent	5	9.8%	3	7.5%	3	8.82%
	Total	51	100.0%	40	100.0%	34	100.0%
Manager	Black	10	4.55%	7	3.4%	6	3.11%
	Brown	25	11.36%	26	12.6%	24	12.44%
	White	180	81.82%	168	81.2%	156	80.83%
	Indigenous	0	0.0%	0	0.0%	0	0.0%
	Asian descent	5	2.27%	6	2.9%	7	3.63%
	Total	220	100.0%	207	100.0%	193	100.0%

Technical leader	Black	3	6.0%	0	0.0%	0	0.0%
	Brown	10	20%	7	13.2%	7	14.89%
	White	34	68.0%	44	83.0%	39	82.98%
	Indigenous	0	0.0%	0	0.0%	0	0.0%
	Asian descent	3	6.0%	2	3.8%	1	2.13%
	Total	50	100.0%	53	100.0%	47	100.0%
Coordinator	Black	9	3.14%	11	4.1%	17	6.39%
	Brown	39	13.59%	53	19.6%	57	21.43%
	White	234	81.53%	205	75.9%	189	71.05%
	Indigenous	0	0.0%	0	0.0%	0	0.0%
	Asian descent	5	1.74%	1	0.4%	3	1.13%
	Total	287	100.0%	270	100.0%	266	100.0%

Specialist	Black	8	3.86%	8	3.1%	8	2.85%
	Brown	40	19.32%	40	15.7%	55	19.57%
	White	156	75.36%	205	80.7%	211	75.09%
	Indigenous	0	0.0%	0	0.0%	1	0.36%
	Asian descent	3	1.45%	1	0.4%	6	2.14%
	Total	207	100.0%	254	100.0%	281	100.0%
Supervisor	Black	1	2.56%	0	0.0%	0	0.0%
	Brown	3	7.69%	0	0.0%	0	0.0%
	White	35	89.74%	14	100.0%	11	100.0%
	Indigenous	0	0.0%	0	0.0%	0	0.0%
	Asian descent	0	0.0%	0	0.0%	0	0.0%
	Total	39	100.0%	14	100.0%	11	100.0%

Analyst III	Black	25	6.28%	27	6.5%	33	7.40%
	Brown	90	22.61%	86	20.7%	90	20.18%
	White	276	69.35%	292	70.2%	312	69.96%
	Indigenous	2	0,5%	3	0.7%	1	0.22%
	Asian descent	5	1.26%	8	1.9%	10	2.24%
	Total	398	100.0%	416	100.0%	446	100.0%
Analyst II	Black	90	9.86%	55	7.1%	48	6.84%
	Brown	177	19.39%	155	20.1%	147	20.94%
	White	634	69.44%	549	71.0%	492	70.09%
	Indigenous	4	0.44%	2	0.3%	3	0.43%
	Asian descent	8	0.88%	12	1.6%	12	1.71%
	Total	913	100.0%	773	100.0%	702	100.0%

Analyst I	Black	92	7.67%	83	8.0%	74	7.45%
	Brown	260	21.68%	228	22.0%	237	23.87%
	White	827	68.97%	712	68.6%	665	66.97%
	Indigenous	2	0.17%	2	0.2%	3	0.3%
	Asian descent	18	1.5%	13	1.3%	14	1.41%
	Total	1,199	100.0%	1,038	100.0%	993	100.0%
Assistant	Black	31	14.03%	41	10.7%	31	10.80%
	Brown	63	28.51%	139	36.3%	91	31.71%
	White	125	56.56%	201	52.5%	164	57.14%
	Indigenous	1	0.45%	2	0.5%	1	0.35%
	Asian descent	1	0.45%	0	0.0%	0	0.0%
	Total	221	100.0%	383	100.0%	287	100.0%

Auxiliary	Black	18	16.07%	6	12.2%	4	14.81%
	Brown	29	25.89%	10	20.4%	5	18.52%
	White	65	58.04%	33	67.3%	18	66.67%
	Indigenous	0	0.0%	0	0.0%	0	0.0%
	Asian descent	0	0.0%	0	0.0%	0	0.0%
	Total	112	100.0%	49	100.0%	27	100.0%
Intern	Black	7	8.97%	4	8.3%	1	2.94%
	Brown	11	14.1%	11	22.9%	11	32.35%
	White	60	76.92%	32	66.7%	21	61.76%
	Indigenous	0	0.0%	0	0.0%	0	0.0%
	Asian descent	0	0.0%	1	2.1%	1	2.94%
	Total	78	100.0%	48	100.0%	34	100.0%

Apprentice	Black	9	15.79%	5	12.5%	3	6.25%
	Brown	9	15.79%	11	27.5%	16	33.33%
	White	39	68.42%	24	60.0%	28	58.33%
	Indigenous	0	0.0%	0	0.0%	0	0.0%
	Asian descent	0	0.0%	0	0.0%	1	2.08%
	Total	57	100.0%	40	100.0%	48	100.0%
Total	Black	303	7.9%	248	6.9%	226	6.68%
	Brown	759	19.8%	767	21.3%	740	21.87%
	White	2,713	70.7%	2,528	70.1%	2,349	69.44%
	Indigenous	9	0.2%	10	0.3%	9	0.27%
	Asian descent	53	1.4%	53	1.5%	59	1.74%
	Total	3,837	100.0%	3,606	100.0%	3,383	100.0%

Percentage of employees by functional category with disabilities.

Functional category	PcD	2023 (T)	2023 (%)	2024 (T)	2024 (%)	2025 (T)	2025 (%)
CEO	Person with a disability	0	0.0%	0	0.0%	0	0.0%
	Person without disability	1	100.0%	1	100.0%	1	100.0%
	Total	**1**	**100.0%**	**1**	**100.0%**	**1**	**100.0%**
Vice President	Person with a disability	0	0.0%	0	0.0%	0	0.0%
	Person without disability	5	100.0%	7	100.0%	7	100.0%
	Total	**5**	**100.0%**	**7**	**100.0%**	**7**	**100.0%**
Director	Person with a disability	0	0.0%	0	0.0%	0	0.0%
	Person without disability	51	100.0%	40	100.0%	34	100.0%
	Total	**51**	**100.0%**	**40**	**100.0%**	**34**	**100.0%**
Manager	Person with a disability	2	0.9%	3	1.4%	3	1.6%
	Person without disability	218	99.1%	204	98.6%	190	98.4%
	Total	**220**	**100.0%**	**207**	**100.0%**	**193**	**100.0%**

Functional category	PcD	2023 (T)	2023 (%)	2024 (T)	2024 (%)	2025 (T)	2025 (%)
Technical leader	Person with a disability	1	2.0%	0	0.0%	0	0.0%
	Person without disability	49	98.0%	53	100.0%	47	100.0%
	Total	**50**	**100.0%**	**53**	**100.0%**	**47**	**100.0%**
Coordinator	Person with a disability	2	0.7%	2	0.7%	1	0.4%
	Person without disability	285	99.3%	268	99.3%	264	99.6%
	Total	**287**	**100.0%**	**270**	**100.0%**	**265**	**100.0%**
Specialist	Person with a disability	1	0.5%	1	0.4%	2	0.7%
	Person without disability	206	99.5%	259	99.6%	279	99.3%
	Total	**207**	**100.0%**	**260**	**100.0%**	**281**	**100.0%**
Supervisor	Person with a disability	0	0.0%	0	0.0%	0	0.0%
	Person without disability	39	100.0%	14	100.0%	11	100.0%
	Total	**39**	**100.0%**	**14**	**100.0%**	**11**	**100.0%**

Functional category	PcD	2023 (T)	2023 (%)	2024 (T)	2024 (%)	2025 (T)	2025 (%)
Analyst III	Person with a disability	3	0.75%	4	1.0%	5	1.1%
	Person without disability	395	99.3%	412	99.0%	441	98.9%
	Total	**398**	**100.0%**	**416**	**100.0%**	**446**	**100.0%**
Analyst II	Person with a disability	14	1.5%	16	2,1%	11	1.6%
	Person without disability	899	98.5%	757	97.9%	691	98.4%
	Total	**913**	**100.0%**	**773**	**100.0%**	**702**	**100.0%**
Analyst I	Person with a disability	42	3.5%	44	4.2%	50	5.0%
	Person without disability	1157	96.5%	994	95.8%	943	95.0%
	Total	**1199**	**100.0%**	**1038**	**100.0%**	**993**	**100.0%**
Assistant	Person with a disability	12	5.4%	15	3.9%	11	3.8%
	Person without disability	209	94.6%	368	96.1%	276	96.2%
	Total	**221**	**100.0%**	**383**	**100.0%**	**287**	**100.0%**

Categoria funcional	PcD	2023 (T)	2023 (%)	2024 (T)	2024 (%)	2025 (T)	2025 (%)
Auxiliary	Person with a disability	12	10.7%	11	22.4%	12	44.4%
	Person without disability	100	89.3%	38	77.6%	15	55.6%
	Total	**112**	**100.0%**	**49**	**100.0%**	**27**	**100.0%**
Intern	Person with a disability	0	00.0%	0	0.0%	1	2.9%
	Person without disability	78	100.0%	48	100.0%	33	97.1%
	Total	**78**	**100.0%**	**48**	**100.0%**	**34**	**100.0%**
Apprentice	Person with a disability	1	1.8%	0	0.0%	0	0.0%
	Person without disability	56	98.3%	40	100.0%	48	100.0%
	Total	**57**	**100.0%**	**40**	**100.0%**	**48**	**100.0%**
Total	PcD	78	2.0%	96	2.7%	96	2.8%
	No disability	3,748	98.0%	3,510	97.3%	3,287	97.2%
	Grand total	**3,826**	**100.0%**	**3,606**	**100.0%**	**3,383**	**100.0%**

Percentage of gender representation by functional category

Employee Category	Men (%)	Women (%)	Other Categories / Not Disclosed (%)
Executive Management	75.25%	24.75%	0.0%
Non-Executive Management	60.19%	39.81%	0.0%
Technical Staff	73.78%	26.22%	0.0%
All other employees	**58.26%**	**41.74%**	**0.0%**

Percentage of representation of diversity groups by functional category

Employee Category	Black and Brown (%)	People with disabilities (%)	Over 50 years old (%)
Executive Management	6.93%	0.0%	12.87%
Non-Executive Management	23.50%	0.96%	3.60%
Technical Staff	21.34%	0.61%	1.83%
All other employees	**31.18%**	**3.55%**	**0.99%**

**LWSA classifies its employees into the following standardized functional categories:*

- Executive Management: CEO, Vice-President, Director I, Director II, Board Member, and Executive Manager.
- Non-Executive Management: Manager I, Manager II, Coordinator I, Coordinator II, and Supervisor.
- Technical Staff: Technical Leader I, Technical Leader II, Specialist I and Specialist II.
- All other employees: Analysts (I, II and III), Assistant, Auxiliary, Intern and Apprentice.

Greenhouse Gas Emissions

GRI 305-1, 305-2, 305-3

Total GHG emissions, by scope (tCO_2e)

Scope	Category	2023	2024	2025
Scope 1[1]	Stationary combustion	100.52	140.36	110.07
	Mobile combustion	23.68	1.49	1.65
	Fugitive emissions	58.07	107.53	0.70
	Total	**182.274**	**249.38**	**112.42**
Scope 2[2]	Electricity consumption (location-based)	611.76	845.39	652.93
	Electricity consumption (market-based)[4]	-	-	19.52
Scope 3[3]	Purchased goods and services [5]	-	-	0.14
	Capital goods [6]	-	-	159.29
	Upstream transport	-	1,000.06	4,456.16
	Waste generated in operations	10.24	28.35	23.75
	Business trips	313.31	443.26	232.26
	Employee commuting	619.74	588.32	939.45
	Total	**943.29**	**2,063.16**	**5,811.06**

Notes: [1]The gases included in the calculation are: CO_2, CH_4, N_2O and HFCs. [2]The gases included in the calculation are: CO_2, CH_4 and N_2O. [3]The gases included in the calculation are: CO_2, CH_4 and N_2O. In 2025, the emission of scope 3 gases did not necessarily increase, but rather the mapping of the upstream Transportation category was expanded, encompassing all product deliveries made by the Melhor Envio unit, through the consolidation of the data collection methodology. The consolidation approach was operational control. The methodology used was that of the Brazilian GHG Protocol Program, and the Fifth Assessment Report (AR5) of the IPCC was used as the source of the GWP. 4 In 2025, the methodology for choosing a purchase through the purchase of IREC was adopted for the first year. 5, 6 The categories Goods and services purchased and Capital goods were included in the inventory in 2025.

Total biogenic GHG emissions, by scope (tCO_2e)

Scope	Category	2023	2024	2025
Scope 1	Stationary combustion	11.71	20.62	17.19
	Mobile combustion	12.23	0.89	0.59
Scope 3	Purchased goods and services	0.0	0.0	0.04
	Upstream transport	0.0	145.59	660.16
	Business trips	4.40	4.82	10.49
	Employee commuting	234.24	152.97	224.25

Compliance and Anti-Corruption

GRI 205-2

Communication and training in anti-corruption policies and procedures by region (2025)

Region	Total number of employees	Employees informed	% Employees informed	Trained	% Trained
North	15	4	26.67%	4	26.67%
North East	119	22	18.49%	21	17.65%
Central - West	40	16	40.00%	7	17.50%
Southeast	2,114	574	27.15%	283	13.39%
South	981	233	23.75%	32	3.26%
Total	**3,269**	**849**	**25.97%**	**347**	**10.61%**

Note: This training is focused on employees in the finance vertical, taking into account the specificities of this area of operation.

Communication and training in anti-corruption policies and procedures, by functional category (2025)

Functional Category	Total number of employees	Employees informed	% Employees informed	Trained	% Trained
Vice President	6	1	16.67%	2	33.33%
Director	33	3	9.09%	6	18.18%
Manager	182	23	12.64%	30	16.48%
Technical Leader	47	8	17.02%	1	2.13%
Coordinator	256	37	14.45%	40	15.62%
Specialist	268	68	25.37%	27	10.07%
Analyst III	2,078	542	26.08%	229	11.02%
Assistant	275	106	38.55%	1	0.36%
Auxiliary	27	4	14.81%	0	0.00%
Apprentices	45	27	60.00%	4	8.89%
Interns	33	30	90.91%	7	21.21%

The categories of Board Member, CEO, and Supervisor did not register any specific training on the topic during 2025.

GRI Content summary

GRI Content Index	
Declaration of use	LWSA reported based on GRI Standards for the period from January 1, 2025 to December 31, 2025.
Applicable GRI Sector Standard(s):	Not applicable

GRI Standard	Disclosure	Page/answer	Omission		
			Omitted requirements	Reason	Explanation
General disclosures					
The organization and its reporting practices					
GRI 2: General Disclosures 2021	2-1 Organizational details	6			
	2-2 Entities included in the organization's sustainability reporting	3			
	2-3 Reporting period, frequency and contact point	3			
	2-4 Restatements of information	A restatement was made for disclosure 2-21.			
	2-5 External assurance	This report has not been subject to independent external assurance.			
Activities and workers					
GRI 2: General Disclosures 2021	2-6 Activities, value chain and other business relationships	8, 78	2-6 c)	Not applicable	
	2-7 Employee information	61, 73, 95			
	2-8 Workers who are not employees	61, 95			

GRI Standard	Disclosure		Page/answer	Omission		
				Omitted requirements	Reason	Explanation
The organization and its reporting practices						
GRI 2: General Disclosures 2021	2-9	Governance structure and composition	16, 18, 24	2-9-c vi)	Not applicable	
	2-10	Nomination and selection of the highest governance body	16, 18			
	2-11	Chair of the highest governance body	16, 18	2-11 b)	Not applicable	At LWSA, the Chair of the Board of Directors does not concurrently hold the position of CEO.
	2-12	Role of the highest governance body in overseeing the management of impacts	16, 18, 22, 23			
	2-13	Delegation of responsibility for managing impacts	16, 18			
	2-14	Role of the highest governance body in sustainability reporting	3			
	2-15	Conflicts of interest	32			
	2-16	Communication of critical concerns	16, 18, 22			
	2-17	Collective knowledge of the highest governance body	16, 18	2-17 a)	Not applicable	No specific actions were taken to advance the knowledge of the board of directors' members on sustainable development; however, the company has an ESG Committee to address the topic and discuss strategies that the company will adopt.

GRI Standard	Disclosure		Page/answer	Omission		
				Omitted requirements	Reason	Explanation
GRI 2: General Disclosures 2021	2-18	Evaluation of the performance of the highest governance body	16, 20			
	2-19	Remuneration policies	29			
	2-20	Process to determine remuneration	29	2-20 a iii); 2-20 b)	Not applicable	There are no remuneration consultants acting on decisions and strategies for positions and salaries. This is done internally by the team according to business guidelines and strategy. There is no voting for policies and proposals. Document validation takes place between executives from the People, Culture, and ESG area.
	2-21	Annual total compensation ratio	30, 31 Regarding item a: As part of our commitment to transparency and continuous improvement in reporting, we have updated the historical series of remuneration indicators. The values for the 2024 fiscal year disclosed in the previous edition were revised to reflect the consolidated database of the period and actually refer to the year 2023. That said, the data has been changed (revised base inserted in the Evidences tab). Consequently, the ratio between the highest compensation and the organization's median went from 51.30 (revised 2024) to 35.04 (2025), a movement driven by structural adjustments in senior leadership and the continuous recognition of our workforce, which recorded a 9.7% increase in median remuneration.	"2-21 a); 2-21 b);	Confidentiality	Salary structures involve a series of strategies and methodological particularities, thus the average total compensation considering all other employees is not an indicator that makes sense to evaluate in its entirety, given that there are companies with different maturity levels, different inflation/deflation factors across regions of Brazil, different Collective Bargaining Agreements, and different business strategies.

GRI Standard	Disclosure		Page/answer	Omission		
				Omitted requirements	Reason	Explanation
Strategy, policies and practices						
GRI 2: General Disclosures 2021	2-22	Statement on sustainable development strategy	4			
	2-23	Policy commitments	32			
	2-24	Embedding policy commitments	32			
	2-25	Processes to remediate negative impacts	32	2-25 c); 2-25 e)	Not available/Not applicable	
	2-26	Mechanisms for seeking advice and raising concerns	32			
	2-27	Compliance with laws and regulations	32	2-27 b-i); 2-27 b-ii); 2-27 c); 2-27 d)	Not applicable	No penalties incurred.
	2-28	Membership associations	35	2-6 c)	Not applicable	The Company does not have a significant role or participation in associations or advocacy organizations.
Stakeholder engagement						
GRI 2: General Disclosures 2021	2-29	Approach to stakeholder engagement	58			
	2-30	Collective bargaining agreements	72			
Material Topics						
GRI 3: Material Topics 2021	3-1	Process to determine material topics	10			
	3-2	List of material topics	10			

GRI Standard	Disclosure		Page/answer	Omission		
				Omitted requirements	Reason	Explanation
Employee Journey						
GRI 3: Material Topics 2021	3-3	Management of material topics	61			
GRI 401: Employment 2016	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	67			
GRI 404: Training and Education 2016	404-1	Average hours of training per year per employee	68, 99, 100			
	404-2	Programs for upgrading employee skills and transition assistance programs	68			
GRI 405: Diversity and Equal	405-1	Diversity of governance bodies and employees	31, 73, 101			
Corporate Governance and Compliance						
GRI 3: Material Topics 2021	3-3	Management of material topics	15, 32			
GRI 205: Anti-corruption 2016	205-2	Communication and training about anti-corruption policies and procedures	32, 39, 41, 128			
	205-3	Confirmed incidents of corruption and actions taken	32, 42	205-3	Not applicable	LWSA had no confirmed cases of corruption involving employees, business partners, or lawsuits brought against the organization or its employees.
Information Security						
GRI 3: Material Topics 2021	3-3	Management of material topics	43			
GRI 418: Customer Privacy 2016	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	53			

GRI Standard	Disclosure		Page/answer	Omission		
				Omitted requirements	Reason	Explanation
Customer Experience						
GRI 3: Material Topics 2021	3-3	Management of material topics	78			
Innovation and Technology						
GRI 3: Material Topics 2021	3-3	Management of material topics	54			
Additional Disclosures - indicators not included in materiality, but reported to maintain historical series and comparability						
GRI 201: Economic Performance 2016	201-1	Direct economic value generated and distributed	92	201-1 b)	Not applicable	Not applicable, since data is disclosed only on a consolidated basis, without distributions by market, country, or other details.
GRI 302: Energy 2016	302-1	Energy consumption within the organization	86			
	302-4	Reduction of energy consumption	86	302-4 b), c), d)	Not available/ Not applicable	
GRI 303: Water and Effluents 2018	303-1	Interactions with water as a shared resource	89	303-1 b), c), d)	Not applicable	
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	88, 126			
	305-2	Energy indirect (Scope 2) GHG emissions	88, 126			
	305-3	Other indirect (Scope 3) GHG emissions	88, 126			
GRI 305: Emissions 2016	403-1	Occupational health and safety management system	74			
	403-2	Hazard identification, risk assessment, and incident investigation	74			
	403-4	Worker participation, consultation, and communication on occupational health and safety	74			
	403-4	Worker training on occupational health and safety	74			

Glossary

- AGM (Annual General Meeting): Mandatory annual meeting between shareholders of a company to deliberate on financial statements, dividend distribution, and the election of the Board.
- AppSec (Application Security): Engineering practices and tools focused on reviewing software code to detect and remediate vulnerabilities before and after system deployment.
- B2B (Business to Business): Business model focused on commercial transactions and providing solutions between companies.
- Board: The highest collegiate governance body of a company, responsible for defining general policies, long-term strategies, and supervising the executive management.
- CASB (Cloud Access Security Broker): Cloud security tool that acts as an intermediary between users and cloud service providers, enforcing security and compliance policies.
- DLP (Data Loss Prevention): Security software designed to monitor, detect, and block the unauthorized leak or transfer of a company's confidential and sensitive data.
- DPIA (Data Protection Impact Assessment): Document and process of deep, preventive technical analysis used to mitigate privacy risks in the processing of large-scale personal data or sensitive data.
- DPO (Data Protection Officer): Professional who acts as a communication channel between the company, data subjects, and the National Data Protection Authority (ANPD), overseeing the privacy program.
- Double Materiality: Management concept in sustainability that assesses priority topics from two perspectives: the impact that the company's activities have on society and the environment (impact materiality), and how socio-environmental issues affect the financial stability and resilience of the business (financial materiality).
- EBITDA - Adjusted (Earnings Before Interest, Taxes, Depreciation, and Amortization): Earnings before interest, taxes, depreciation, and amortization, excluding extraordinary effects. It is an essential indicator to measure operational efficiency and gross cash generation of a company.
- EDR (Endpoint Detection and Response): Advanced cybersecurity solution that continuously monitors endpoints (end-user devices such as computers and servers) to identify, block, and respond to threats and malicious behaviors in real time.
- EOP / EOP Customers (End of Period): Technical metric that indicates the total volume of active customers registered exactly at the close of a specific accounting or annual period.
- ESG (Environmental, Social, and Governance): Strategic triad that encompasses environmental, social, and governance guidelines, anchoring the Company's strategy to generate a positive impact on society and align technology as a driver for responsible inclusion.
- EVP (Employee Value Proposition): Set of benefits, culture, values, and opportunities that a company offers to its employees in exchange for their performance and intellectual capital.
- FCF (Free Cash Flow): Net cash volume generated by the company's operations after deducting all operating expenses and capital expenditures (CapEx).
- GHG Emissions (Scopes 1, 2, and 3): Gases that contribute to climate change (such as CO_2, CH_4, N_2O, and HFCs) whose emissions resulting from the Company's activities, mapped across Scopes 1, 2, and 3, are neutralized through offsetting.
- GMV (Gross Merchandise Volume): Total value of sales transacted and processed through all e-commerce platforms and marketplaces within an ecosystem.
- GRI (Global Reporting Initiative): International organization that establishes the global standards and frameworks most widely used by companies for preparing and reporting sustainability reports.
- I-REC (International Renewable Energy Certificate): Global certificates that prove and guarantee the traceability that the electricity consumed by the institution comes from a 100% renewable source.
- ISAE 3402: International auditing standard that certifies the robustness, effectiveness, and compliance of the internal controls of service providers, specifically applied to Data Center infrastructure.
- LGPD (General Data Protection Law): Brazilian legislation (Law No. 13,709/2018) that regulates personal data processing activities, protecting citizens' fundamental rights to freedom and privacy.
- MDM (Mobile Device Management): Software that allows the IT department to manage, monitor, and enforce centralized security policies on corporate smartphones and tablets.
- MSCI ESG Rating: Global rating that measures a company's resilience to long-term financial risks associated with environmental, social, and governance factors.
- PCI DSS (Payment Card Industry Data Security Standard): International and mandatory data security standard for all organizations that process, store, or transmit payment card information.
- SaaS (Software as a Service): Business and technology distribution model in which software is hosted in the cloud and used by the client through a periodic subscription payment.
- SAST and DAST (Static and Dynamic Application Security Testing): Security tests applied to software. SAST analyzes the source code statically (without execution), while DAST simulates external attacks in real time with the application running.
- SDGs (Sustainable Development Goals): Global agenda of the United Nations (UN) composed of 17 goals and targets to eradicate poverty, protect the environment, and ensure peace and prosperity by 2030.
- SOC (Security Operations Center): A centralized and dedicated unit focused on continuous monitoring (24/7), detection, analysis, and rapid response to cyber incidents and technological threats.
- TPV (Total Payment Volume): Total monetary value processed end-to-end by an institution's financial payment solutions.
- WAF (Web Application Firewall): Security filter that protects web applications against malicious traffic and attacks (such as SQL injection and XSS) at the network layer.
- AML/CFT (Anti-Money Laundering / Combating the Financing of Terrorism): Programs and compliance regulations required from financial institutions to Prevent Money Laundering and Combat the Financing of Terrorism and Proliferation of Weapons.

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LWSA Archive

Sustainability Report

2025

lwsa