
**SOCIAL, ENVIRONMENTAL AND CLIMATE
RESPONSIBILITY POLICY**

**PAGSEGURO INTERNET INSTITUIÇÃO DE PAGAMENTO S.A.
AND OTHER COMPANIES OF THE PRUDENTIAL CONGLOMERATE**

SOCIAL, ENVIRONMENTAL AND CLIMATE RESPONSIBILITY POLICY	Responsible areas:	Operational Risks and Internal Controls & Compliance
	Date:	September/2023

Validity and Update

This Policy is valid for 2 (two) years as of the last revision date included in the table at the end of the document. It must be revised and updated before its expiration date and in the event of changes in applicable legislation and/or strategic direction of the Prudential Conglomerate.

Any change to this Policy must be previously analyzed by the Operational Risk and Internal Controls & Compliance areas.

SOCIAL, ENVIRONMENTAL AND CLIMATE RESPONSIBILITY POLICY	Responsible areas:	Operational Risks and Internal Controls & Compliance
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1. INTRODUCTION AND PURPOSE

This **Social, Environmental and Climate Responsibility Policy** ("Policy") applies to PagSeguro Internet Instituição de Pagamento S.A. ("PagSeguro"), the leading institution of the Prudential Conglomerate, BancoSeguro S.A. ("BancoSeguro"), Wirecard Brazil Instituição de Pagamento S.A. ("MOIP") and Paginvest Corretora de Títulos e Valores Mobiliários Ltda ("PagInvest"), which are institutions owned by PagBank's Prudential Conglomerate, collectively referred to as "Companies".

2. COVERAGE

This Policy applies to all employees at the Companies, its clients, suppliers, and other interested parties, including directors and service providers, both natural persons and legal entities, regardless if they have been structured into physical or virtual units and/or their form of access, local or remote, to PagBank's conglomerate environment.

3. DEFINITION

Social, Environmental and Climate Responsibility: a commitment to society, the environment and the climate that can be observed through attitudes and initiatives aimed at human development and to improve people's lives.

SECRP: acronym for the Social, Environmental, and Climate Responsibility Policy.

Social, Environmental, and Climate Risk: the risk of loss arising from social, environmental, and climate damages.

Relevance: the level of exposure to social, environmental, and climate risks arising from the institution's activities and operations.

Proportionality: the compatibility of the SECRP with the institution's operations and the complexity of its activities, financial services, and products.

4. STRUCTURE

As the leader of the prudential conglomerate, PagBank centralizes the Risk Management and Internal Control structure, which, as required by the regulations in force, is independent as to the performance of its activities. BancoSeguro does not have employees on its staff that are directly allocated to the Company's activities. As it is a company belonging to the UOL Group, the Company uses the services and workforce from the employees of the UOL Group in the areas related to its business. Therefore, the structure of the Operational Risk and Internal Control area is part of the Risk and Compliance Department of PagSeguro Internet Instituição de Pagamento S.A., with unrestricted access to the Executive Board and independence in carrying out activities with all areas of the Company.

5. PURPOSE OF THE SOCIAL, ENVIRONMENTAL, AND CLIMATE RESPONSIBILITY POLICY.

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SOCIAL, ENVIRONMENTAL AND CLIMATE RESPONSIBILITY POLICY	Responsible areas:	Operational Risks and Internal Controls & Compliance
	Date:	September/2023

Based on CMN Resolution 4.945/2014, the Central Bank of Brazil established the guidelines to be observed in the preparation of this social, environmental, and climate responsibility policy of BancoSeguro. The Company is committed to operating with social, environmental, and climate responsibility, aiming at performing preventive, educational, assistance, inclusion and support actions to combat illegality. The Social, Environmental, and Climate Responsibility Policy (SECRP) was prepared according to the principles of relevance of activities and operations and the proportionality of the financial services and products offered.

6. PRINCIPLES AND GUIDELINES

To promote a social, environmental, and climate responsibility program that is in line with the Governance guidelines of the Companies, which aim to respect the best market practices and the principles of social, environmental, and climate responsibility, BancoSeguro formulated principles and guidelines that seek to promote the sustainable development of its businesses, as well as the alignment with ethical and transparency principles, which are transcribed below.

- Business ethics and transparency and the establishment of necessary ethical standards to guide the conduct of its employees;
- Adequate corporate governance structure;
- Maintain guidelines and policies for customer relationships, anti-money laundering and anti-corruption;
- Consider social, environmental, and climate risks when doing business;
- Guarantee of a healthy and safe workplace environment for all its employees, free of any abuse/harassment, discrimination, intimidation or violence, including any kind of slavery-like labor, child labor and sexual exploitation;
- Appreciation of people, maintaining an inclusive work environment, offering equal opportunities and encouraging the balance between the personal and professional life;
- Financial education programs for all its employees, customers, and other stakeholders;
- Respect for human rights and diversity;
- Supply of products and services that are adequate to meet its customers' needs;
- Availability of service communication channels via chat, email and telephone to facilitate dialogue with stakeholders; and
- Promotion of social, environmental, and climate programs that benefit communities and other stakeholders.

7. CORPORATE GOVERNANCE

BancoSeguro has a governance structure to ensure that the principles and guidelines listed herein are followed.

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SOCIAL, ENVIRONMENTAL AND CLIMATE RESPONSIBILITY POLICY	Responsible areas:	Operational Risks and Internal Controls & Compliance
	Date:	September/2023

In view of the authority established in BCB Resolution 4.945/21 and considering that BancoSeguro's structure has low relevance to social, environmental, and climate risks, which under the proportionality assessment presents little complexity in its businesses, activities, and the products offered, it was established that the Operational Risk and Internal Controls area shall be responsible for the SECRP, therefore without the need to set up a specific Committee.

7.1. Responsibilities of the Areas

All employees, when carrying out their activities, must contribute to the Social, Environmental, and Climate Responsibility of the PagBank conglomerate. However, those directly responsible for the policy are listed below:

7.1.1. Risk Officer Responsible for SECRP

The officer responsible for the operational risk management was duly designated before the Central Bank of Brazil and shall ensure the compliance of all tasks described in this Policy in a proper and timely manner.

7.1.2. Operational Risks and Internal Controls

In avoid conflicts of interest, the management of social, environmental, and climate risks is subordinate to the Operational Risk and Internal Controls area, which carries out governance through its methodology to ensure compliance with the guidelines and objectives established in this Policy.

The Operational Risk and Internal Control area shall be responsible for:

- a) Implementing actions within the scope of SECRP;
- b) Monitoring compliance with the actions established in the SECRP;
- c) Assessing the effectiveness of the actions that have been implemented;
- d) Verifying the adequacy of the social, environmental, and climate risk management established in this Policy; and
- e) Identifying any deficiencies during the implementation of the actions.

7.1.3. Prevention of Money Laundering and Terrorist Financing

- a) Identifies and restricts suppliers and representatives listed in the Employer Register of the Ministry of Labor (blacklist); and
- b) Monitors anti-money laundering and terrorist financing.

7.1.4. Investments

- a) Ensures that knowledge is maintained regarding customers and their respective portfolios, being aware that the conquering or maintenance of a customer relationship must always be guided by the principles of transparency and fairness in activities, within the "Know Your Customer" concept, and not just for commercial interests and/or profitability that the customer may offer;

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SOCIAL, ENVIRONMENTAL AND CLIMATE RESPONSIBILITY POLICY	Responsible areas:	Operational Risks and Internal Controls & Compliance
	Date:	September/2023

- b) Ensures that financial education content will be multiplied, aimed at instructing respective customers with full information about the products being offered;
- c) Ensures to serve, record, instruct, analyze, and give adequate and formal treatment to customers and user demands for the available products and services; and
- d) Ensures that necessary clarification and information is provided to parties who have filed a complaint, informing them on the progress of their complaints and the measures adopted.

7.1.5. Ombudsman

- a) Serves, records, instructs, analyzes, and addresses – formally and adequately – complaints filed by customers and users of products and services that are not solved by the Companies’ regular customer service channels;
- b) Provides necessary clarification and informs the complaining parties of the progress of their complaints and the measures that are being adopted;
- c) Informs parties who have filed a complaint on the expected deadline for providing a final response, which cannot exceed 10 (ten) business days, as of the date the complaint was filed, according to the rules in force.
- d) Forwards a conclusive response to the parties who have filed a complaint within the deadline informed in item c);
- e) Maintains the Company's management informed about the problems and deficiencies identified during the fulfillment of their duties and the results of the measures adopted by BancoSeguro's administrators to resolve them; and
- f) Prepares and forwards to the Internal Audit area and the Executive Board of the Companies a quantitative and qualitative report on the Ombudsman’s performance at the end of every six-month period, containing the propositions addressed in item e).

7.1.6. Compliance

- a) Submits this Policy to the Officer responsible for its approval;
- b) Interacts with regulators and self-regulators when necessary; and
- c) Monitors applicable legislation and regulations and verifies the adequacy of internal rules.

7.1.7. Portfolio Governance of the Companies - PGC

- a) Develops and automatizes the product/business approval process, adjusting it to the Agile model and enjoying all advantages and functionalities applied to the PGC;
- b) The Portfolio Governance team monitors the updates and stages of the initiatives;
- c) The PGC provides support and acts as a facilitator in meetings, such as meeting on the understanding and portfolio committee.

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SOCIAL, ENVIRONMENTAL AND CLIMATE RESPONSIBILITY POLICY	Responsible areas:	Operational Risks and Internal Controls & Compliance
	Date:	September/2023

7.1.8. Facilities

- Establishes the rules for using the breastfeeding supporting spaces located in the Faria Lima building (No. 1,384) and in the Barão de Limeira building (No. 458);
- Establishes the rules for using the Espaço MOB, located in the Faria Lima building (No 1,384); and
- Establishes the rules for using the electric vehicle charging station of the Faria Lima building (No. 1,384).

7.1.9 ESG

- Supports other areas on standards and good practices related to social, environmental, and climate responsibility.
- Contributes with other areas in fulfilling all the tasks described in this Policy.
- Monitors the SECRP review process.
- Supports the information disclosure process provided in CMN Resolution 4,945/2021.

8. SOCIAL, ENVIRONMENTAL, AND CLIMATE RISK MANAGEMENT

Social, Environmental, and Climate Risk Management aims, among others, to minimize any existing negative effects on the approved operations and create opportunities to disseminate a culture of social, environmental, and climate responsibility among employees, customers, suppliers, service providers, and other stakeholders.

BancoSeguro seeks to establish a relationship with companies, partners, and suppliers with good social, environmental, climate, and ethical conduct and that encourage the adoption of best practices, thereby rejecting any conduct that is not in compliance with the principles of BancoSeguro, in addition to illegalities and actions aimed at personal benefits that characterize acts of corruption or bribery.

8.1. Risk Assessment

The perception of risk related to activities, customers, suppliers, and correspondents, which shall be classified as Low, Moderate, High, and Critical.

To carry out such assessment, we:

- Identify, classify, monitor, and take control measures to mitigate social, environmental, and climate risks present in the activities of the PagBank conglomerate as well as in its operations;
- Record data referring to actual losses arising from social, environmental, and climate damages, for a minimum period of five years, including amounts, type, location, and the economic sector that is the object of the operation;
- Carry out a prior assessment of the potential negative social, environmental, and climate

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SOCIAL, ENVIRONMENTAL AND CLIMATE RESPONSIBILITY POLICY	Responsible areas:	Operational Risks and Internal Controls & Compliance
	Date:	September/2023

impacts from new types of products and services offered by the PagBank conglomerate, including reputational risk; and

- Carry out procedures to adjust social, environmental, and climate risk management related to legal, regulatory, and market changes.

9. QUESTIONS

Questions about this Policy must be forwarded to the Operational Risk and Internal Control area by sending an e-mail to riscooperacional@uolinc.com.

10. CLOSING REMARKS

This Policy was approved by PagBank's Executive Board at the meeting held on October 02, 2023.

10. EXHIBITS

N/A

11. CONTROL OF REVISIONS

Revision	Changes	Date
00	Initial draft Operational Risk, Internal Controls & Compliance	January/2020
01	First version Dismembered from the Policy: Risk Operational and Internal Controls & Compliance	May/2022
02	Second version Operational Risk, Internal Controls and Compliance	September/2023

PAGSEGURO INTERNET INSTUIÇÃO DE PAGAMENTO S.A. – OPERATIONAL RISK, INTERNAL CONTROLS & COMPLIANCE

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