



Socio-Environmental Responsibility	POL - 401
	Date Issued: 12/23/2021

Categorization of Information: Public Internal Restrict Confidential

## 1. OBJECTIVE

This policy aims at complying with the Resolution No. 4,327 of the Central Bank of Brazil of April 25, 2014, which provides on the guidelines that must be observed in the establishment and implementation of the Policy for Socio-Environmental Responsibility (PRSA) by financial institutions and other institutions authorized by the Central Bank of Brazil (BACEN).

It also aims at demonstrating, establishing, and guiding processes intended to socio-environmental practices, thus preventing possible negative socio-environmental impacts and boosting positive impacts on the environment and society, contributing to the achievement of the goals established in our mission and reinforcing the strategic importance of the topic.

More than empowering businesses, our commitment is to promote social, environmental, and governance practices that transform the future. We combine our agility to adapt and also to respond to transformations, thus seeking to be agents of change and enabling these achievements to bring great benefits, far beyond the corporate scope, but rather to society as a whole.

We believe that technology can be an enabler of socio-environmental transformations, as well as an ecosystem of cooperation for innovation, and we understand our responsibility within this context.

Therefore, we are committed to acting responsibly in the environmental, social, and governance spheres, ensuring the sustainability of the business in the face of major global trends and challenges, thus generating value for our customers, people and supplying companies, investors, and, of course, for society.



## **2. COVERAGE**

This Policy is applicable to and must be complied with by all employees of Dock and its subsidiaries (collectively, “Dock”), as well as third parties and service providers.

## **3. STANDARDS AND CERTIFICATIONS**

- BACEN
- PCI
- SOX
- ISO 27.002
- NOT APPLICABLE

## **4. REFERENCE DOCUMENTS**

Code Diversity, Inclusion and Equity Policy  
Code of Ethics

## **5. GENERAL PROVISIONS**

The employees involved in the process concerned are aware of that the guidelines defined herein may be audited. Therefore, it is recommended not to save copies of the guidelines on the desktop/network directories or print them out. The employee must always access the One Trust.

## **6. GUIDELINES**

We are committed to acting responsibly in all spheres (Environmental, Social, and Governance) to ensure the company’s sustainability in the face of major global trends and challenges, delivering value to our team, customers, people and supplying companies, investors, and society.



We operate aligned with three guidelines, which are:

- I. The future we wish for;**
- II. Current movements that point to the future;**
- III. How we are building the future.**

The following definitions are contained in our forward-looking perspective and mission related to sustainability (guideline I):

- Technology as an enabler of socio-environmental transformations;
- Stakeholders' capitalism;
- Ecosystem of cooperation for innovation.

The following definitions are contained in the current main themes that direct us to what we believe in the future (guideline II):

- Decarbonization;
- Positive social impact solutions;
- Positive environmental impact solutions;
- Nature-based solutions;
- Digital transformation/AI/IoT/Blockchain.

The following definitions are contained in the existing project fronts, as well as values that direct our actions (guideline III):

- Transparency;
- Multistakeholder partnership;
- Investment in social or impact businesses;
- Innovation roadmap focused on minority inclusion;
- Open innovation;
- Social investment;
- Science-based socio-environmental goals.



All of the company's socio-environmental responsibility movements come from a materiality study, which supports the identification of the most relevant topics to be addressed. This study is built through interviews and surveys with all the company's stakeholders, thus understanding the main issues to be addressed considering the organization's sustainability.

In addition, all the projects are related to the UN's Sustainable Development Goals (SDGs), given the relevance with which the company deals with the important Agenda 2030, which guides and defines priorities for sustainable development.

### **a. STAKEHOLDERS**

The company aims at making all stakeholders feel included in the construction and development of its actions and projects, such as this policy, thus making evident the transparency and the clear observance of possible socio-environmental risks and opportunities by the organization, considering, for example, the materiality study, which involved the most diverse stakeholders that relate to the organization for a consultation regarding the main factors to be prioritized.

The organization believes in technology as the main enabler of our customers' evolution and also in transforming the role of financial services thus promoting the society.

This relationship, far beyond technology, is built on solid foundations, with ethics as the main pillar, but also supported by a culture where we consider:

Safe and inclusive environment, with affirmative actions so that candidates and collaborators feel safe to express their identity and plurality;

Diversity is the essence of innovation. We build an environment of equity, inclusion, exchange, and learning that enhances our ideas.

Contributing to education and information of collaborators and other stakeholders, aiming at breaking biases, barriers, and prejudices, leading to the transformation of behaviors;

The evolution, in conjunction with the production chains - people and supplying companies - with the alignment of requirements as a result of sustainability and social responsibility issues,



thus raising the company's level in partnership with our people and supplying companies regarding the practices related to the subject;

Transparency in the relationship with people and supplier companies, providing total clarity and visibility of the established criteria and requirements, and supporting them so that they can build actions that generate benefits not only for the company, but also for themselves and for society with regard to the socio-environmental responsibility issue;

Continuous contribution aligned with the company's values to public interest initiatives, through investments, accelerations, donations, use of encouraged resources, and volunteer work involving collaborators.

Directing the change in behavior of our collaborators with regard to the emissions arising from our operation, seeking, through communication channels, educational means, and coordinated actions, the alignment and adoption of the necessary measures for the continuous reduction of greenhouse gases;

Continuous adoption of training for collaborators, seeking the appreciation and wide dissemination of the culture, besides the possibility of sharing knowledge by internal means, such as communication channels, always with the objective of aligning the best practices possible in the most diverse areas of the organization.

Disclosure, to all interested public, of the current moment and the planning for continuous improvement for the company's social, environmental and governance issues, through a panel of indicators, with wide disclosure, built based on indicators of national and international recognition.

## **b. TRAINING**

The company seeks the training and wide information of its collaborators and other stakeholders regarding socio-environmental issues through:

Promotion of communications in its communication channels related to social, environmental, and governance issues, spreading knowledge and enabling debates and exchanges of experiences;



Broad dissemination of the actions and strategies related to sustainability with all stakeholders, seeking awareness and transparency of the company's socio-environmental responsibility actions;

Creation of committees for subjects of interest related to socio-environmental responsibility issues, fostering debate and enabling the dissemination of the sustainable culture among the areas, through informal leaders in the related topics.

### **c . LEGISLATION AND COMMITMENTS**

The company seeks compliance with the Brazilian legislation applicable to its business and alignment with commitments, pacts, and actions related to its sustainability and socio-environmental responsibility values. With this direction, it carries out actions such as:

- I. Constant updating with regard to the legislation and other socio-environmental regulations;
- II. It follows, in its most detailed and specific guidelines, its Code of Conduct and Ethics and other guidelines related to compliance, privacy, regulation, and socio-environmental responsibility issues.

And reinforces that this policy is in full compliance with Resolution 4,327, approved by the National Monetary Council on 04/25/2014, and should be reviewed and updated whenever necessary, always considering possible new information and alignments related to the topics contained therein.

### **d. SOCIO-ENVIRONMENTAL MANAGEMENT**

The company understands and recognizes the possible socio-environmental risks, i.e., possible losses as a result of damage and/or socio-environmental issues, also knowing that there are other types of risk to which the organization is subject.

Aware of this, it specifically performs socio-environmental risk management in its activities and operations within three pillars, which are:



- I. Environmental**
- II. Social**
- III. Governance**

Contained in pillar (I) are the following principles:

- I. Waste Management, considering all categories - especially the electro-electronic - prioritizing the recycling, reuse and upcycling processes of the most diverse materials arising from the operations, in order to minimize the negative environmental impacts resulting from the incorrect disposal of waste;
- II. Continuous improvement of mechanisms and processes to manage possible impacts resulting from the operations and the work model currently exercised in the company;
- III. Reduction, through scientific metrics, of greenhouse gas emissions, aiming at reaching the “NET ZERO” goal by 2030, by improving internal processes and reducing - and then neutralizing - the use of non-renewable natural resources, which cause negative impacts on the environment and on society as a whole.
- IV. Alignment with pacts, commitments, and obtaining certifications that can direct the company towards the best practices, recognized in the market, with regard to the sustainability theme, enabling the recognition of the company in the market and for its stakeholders with regard to sustainable practices;
- V. Contribution to mitigation and minimizing the negative effects of climate change, as well as the encouragement and actions aimed at raising awareness of energy and water efficiency and the use of renewable energy in our operations.

In pillar (II) are contained:

- I. Promotion of a safe and inclusive environment, with affirmative actions, so that candidates and collaborators feel free to express themselves the way they are, in addition to internal researches and surveys that enable an overview of the company and thus the best direction for the performance of diversity and inclusion practices, mitigating possible risks due to relevant factors not addressed;



- II. Support and incentive to business that enable democratization and financial education, thus making it possible to reduce social and economic inequalities by fostering good practices in these topics;
- III. Training and engagement of the collaborators so that there is the incorporation of a sustainable culture and thus of socio-environmental responsibility practices, both in the corporate environment and outside the company;
- IV. Availability of an ombudsman and ethics channel for the protection of customers and employees, respectively, thus ensuring the principle of defense of the rights of customers and employees, in an impartial and totally independent way.

In item (III) are contained:

- I. Management of ESG performance indicators, with broad participation of the internal and external public, to give visibility through a panel of indicators of the company's socio-environmental responsibility issues;
- II. Encouragement and support to the purchasing area to adjust the registration and approval process of people and supplier companies, considering the socio-environmental responsibility guidelines, thus ensuring that all people and supplier companies are aligned with the best sustainability practices, considering each one's area of activity in relation to its product and/or service;
- III. Draft and revision of this and other policies, with the purpose of making the other areas aware so that, in the elaboration process, they consider and implement sustainable measures and criteria.

## 7. RESPONSIBILITIES

In order to disseminate and correctly allocate the resources involved in this policy, considering the main levels of governance, we have the following related attributions:

### **ESG Executive Committee:**

It is responsible for the analysis and approval of the projects and policies proposed by the ESG department, ensuring their alignment with the materiality matrix and the company's strategy. It





is responsible for, every five (5) years, or when there are relevant changes within such period, the review and approval of this policy.

**ESG Director:**

Responsible for the compliance with this Policy, ensuring its broad dissemination (internal and external public), maintaining all documents related to this Policy available to the Central Bank of Brazil (BACEN);

Definition of the corporate sustainability strategy, allied to the materiality study, considering the main topics and seeking a balance between socio-environmental responsibility and economic development.

Performing the monitoring of the ESG strategy, implementation, and compliance with the items contained in this Policy;

**ESG Department:**

Responsibility for the development and implementation of sustainability initiatives, as well as the support in the development of products and services with the inclusion of environmental criteria;

Performance in the definition and implementation of company-wide ESG indicators, involving the stakeholders in this process;

Definition of the projects related to the corporate sustainability strategy, allied to the materiality study, considering the main topics and seeking a balance between socio-environmental responsibility and economic development. It is responsible for the original version and for, every five (5) years, or when there are relevant changes to be entered in PRSA, the review and maintenance of this policy.

**Legal Department:**

Performing the management of judicial and administrative processes related to socio-environmental risks involving its stakeholders;

Support in the inclusion and revision of contractual clauses that enable risk mitigation and encourage compliance with socio-environmental obligations, considering social factors, such



as preventing slave and child labor; environmental, considering compliance with the legislation and good practices related to environmental protection; and governance, considering the fight against all forms of corruption. It is responsible for, every five (5) years, or when there are relevant changes to PRSA within such period, for the review of this policy.

#### **People Department:**

Seeking to facilitate knowledge of the Policy among collaborators and assisting in monitoring its compliance;

Support and creation of initiatives related to socio-environmental programs, making available resources and knowledge that make it possible, along with the other areas, to expand the culture of socio-environmental responsibility among collaborators.

#### **Internal Controls Department**

Performing analysis and follow-up of the Company's socio-environmental and/or ESG risks, based on the risk management and internal governance guidelines.

#### **Compliance Department**

Perform analysis of the Company's stakeholders, in order to consider possible socio-environmental and/or ESG risks, based on the internal governance guidelines and follow-up on the negotiations.

Receipt and analysis of reports related to possible infringements or irregularities committed by the company or stakeholders and follow up negotiations. It is responsible for, every five (5) years, or when there are relevant changes within such period, requesting for the review of this policy.

#### **Board**

It is responsible for, every five (5) years, or when there are relevant changes to PRSA within such period, the review of this policy.



## Risks

It is responsible for, every five (5) years, or when there are relevant changes to PRSA within such period, the review of this policy.

## 8. DEFINITIONS

**Activities/Processes:** Internal practices which purpose is to have a positive impact on the company's socio-environmental aspects.

**BACEN:** Means the Central Bank of Brazil.

**ESG Executive Committee:** Means the permanent, non-statutory body, whose purpose is to act in the development and implementation of the ESG Strategy, which includes corporate guidelines and acts in the management of environmental, social and governance issues (ESG - Environmental, Social and Governance).

**Organization/Company/Enterprise:** Means Dock Soluções em Meios de Pagamento S.A and its subsidiaries.

**Stakeholders:** Means the customers, collaborators, people and supplying companies, investors, and society that relate directly or indirectly with the company.

**PRSA:** Means this document - Policy for Socio-Environmental Responsibility.

**Employees:** All individuals who have a statutory or employment relationship with Dock. They are the members of the Board of Directors, of the statutory or non-statutory Committees and of the Statutory and Non-Statutory Executive Board, as well as all full-time and temporary employees, third party employees and interns.

## 9. VIOLATIONS, REPORTS AND NON-RETALIATION

Violation of the principles and rules set forth in this Policy subjects violators to disciplinary actions, which may include warning, suspension, or dismissal in the case of Employees, and termination in the case of a Customer, Supplier, or Partner. If you believe someone has violated this policy or any other relevant policy, a law, or Dock's Code of Ethics you should report it at <https://admin.safe.space/>. Dock will keep the report confidential and will deal with it appropriately and will not tolerate retaliation for the report. In case an associate feels he/she has been retaliated against, he/she must immediately inform, as oriented in the Code of Ethics.



## 10. REVISION CONTROL

Revision #	Review Topics	Responsible
01	New Policy	Caroline Dibe

This guideline becomes effective as of its publication date and must be revised whenever supervening facts change the provision hereof or up to 30 days before the end of its effectiveness.

**BACEN/PCI/SOX:** Annual revision, except PRSA revision every 5 years.

**ISO and other guidelines:** Revision every two (2) years.

**Responsible Board:** RI.

**Responsible Area:** ESG