

lwsa

**Sustainability
Report
2023**



Summary

Interactive
Summary



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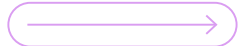
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About this Report

GRI 2-2, 2-3, 2-5, 2-14

This is LWSA's third Annual Sustainability Report, covering the period from January 1 to December 31, 2023. Aligned with the United Nations (UN) Sustainable Development Goals (SDGs), the report was prepared based on the Global Reporting Initiative (GRI) standards and the MSCI ESG rating methodology, which ensures greater comparability and consistency of the information presented.

Committed to transparency and ESG practices, this report presents the measures adopted by the Company throughout 2023 to address the challenges and consolidate and make progress in sustainable initiatives in the governance, social and environmental tripod. Information disclosed in this report, as well as all ESG-related initiatives and decisions, is analyzed and approved by the Board of Directors, the Company's highest governance body. The sustainability report has also been subjected to external assurance, and the assurance report is [\(available on page 113\)](#).

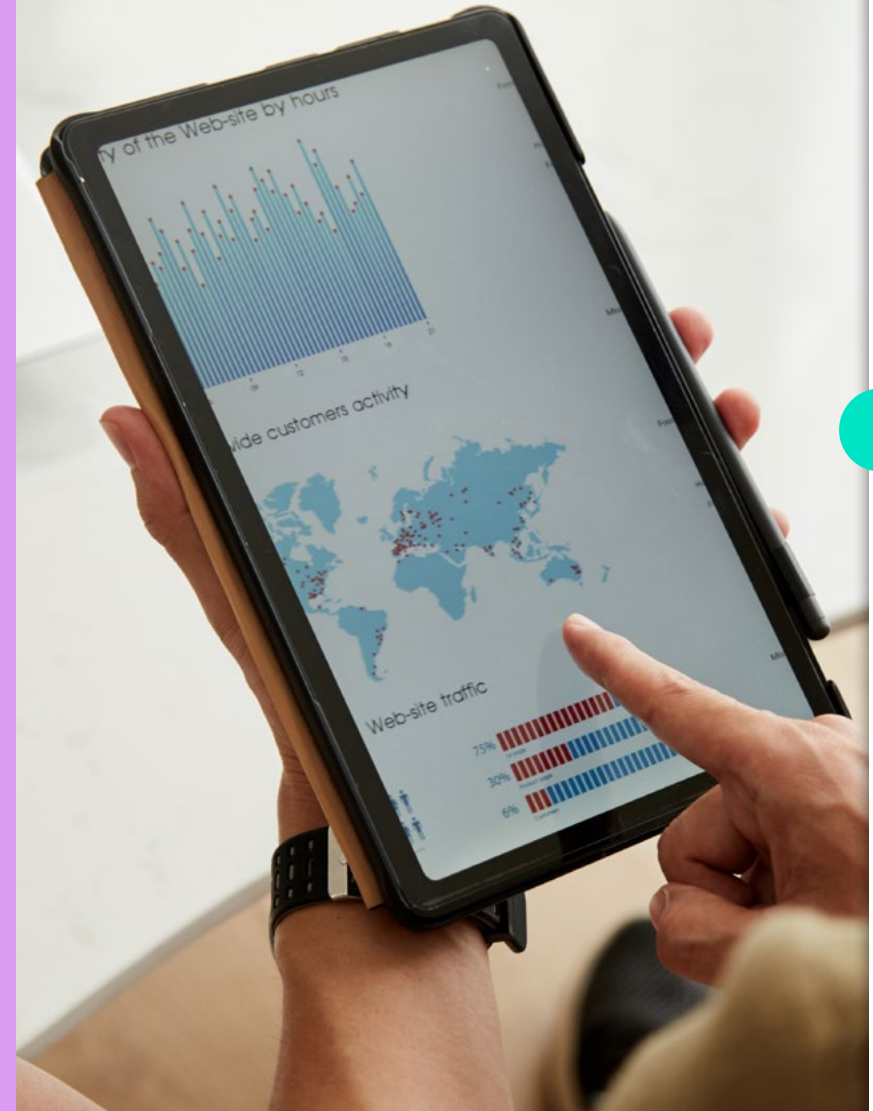


If you have any questions or suggestions, please contact us at ri@lwsa.tech.

Scope of the Report

The report covers the activities carried out by the operating companies through which we operate in the market (**see the list in the Business verticals and brands section**). However, our financial statements, published on March 20, 2024, cover a wider range of companies, considering all legal entities under LWSA's control.

All companies acquired by the Company to date are part of the LWSA ecosystem; therefore, information pertaining to them has been adjusted to comply with this report's standard.



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GRI 2-2, 2-3, 3-3
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Related Global Compact Principles



Related SDG



Message from the CEO

GRI 2-22

LWSA's ESG agenda is intrinsically connected to the positive impact of its actions on both the Company's performance and on its employees and customers, as well as on society. We are currently inserted in an environment in which sustainability is pursued on several fronts, which requires us, as a group, to cultivate an essential cultural trait of strategic clarity and to remain focused on achieving solid corporate management. With this bias, we believe to be able to create beneficial and lasting impacts on the environmental, social and governance pillars.

We have a comprehensive ESG vision, which is grounded on the United Nations (UN) 2030 Agenda, a global sustainability benchmark for people, companies and governments. We have set several goals to our Company: in the environmental pillar, our goal is to be a carbon neutral company; in the social pillar, our goals include to achieve equal pay and fight disparities through quality education; while, in the governance pillar, our goal is to map 100% of our supply chain. All our actions are aligned with these goals and are detailed in this annual report.

"We have set several goals to our Company: in the environmental pillar, our goal is to be a carbon neutral company; in the social pillar, our goals include to achieve equal pay and fight disparities through quality education; while, in the governance pillar, our goal is to map 100% of our supply chain. All our actions are aligned with these goals and are detailed in this annual report."

Fernando Cirne
LWSA's CEO



The year 2023

was marked by great progress in the environmental pillar, towards our ambitious goal of being carbon neutral

100%

of the energy to supply our headquarters and data center from renewable sources

3,800

LWSA's employees

Initiatives designed to encourage those who are involved in LWSA's daily operations to think about and truly engage in sustainable practices in favor of the group and society.

In addition to moving forward and seeking improvements in all areas, our current challenge is to standardize ESG practices for the entire group, after an intense and careful process to integrate dozens of companies acquired since 2020. This process has led to our brand repositioning in 2023, when we dropped the Locaweb Company name and became LWSA.

Our efforts on the ESG agenda start with the commitment of the Company's senior management, which defines and implements guidelines; are coordinated by the ESG Executive Office and cascaded down to all our employees. These are initiatives designed to encourage those who are involved in LWSA's daily operations to think about and truly engage in sustainable practices in favor of the group and society. Just like innovation, which is fundamental to the dynamism of our technology market, ESG principles must be practiced by the entire group, at all levels, in order to be effective.

The year 2023 was marked by great progress in the environmental pillar, towards our ambitious goal of being a carbon neutral company. We have mapped scope 3 in our greenhouse gas (GHG) inventory for

the first time. The inventoried emissions from 2022 were offset through the purchase of carbon credits. This path is relevant for our sector, in which achieving net zero emissions of certain types of greenhouse gases is a challenge due to the nature of our operations.

Meanwhile, in 2023, we were able to purchase 100% of the energy to supply our headquarters and data center from renewable sources. This is an essential step, considering that our greatest environmental impact lies in the high consumption of electricity, especially due to constant need for and use of cooling for our own data center.

People are the greatest asset in the technology sector. This premise was crucial when integrating the acquired companies, protecting and developing the greatest asset we brought to our company. Moreover, it is a guideline so that, at the end of each working day, LWSA's more than 3,800 employees feel part of our business and happy to work focused on offering the best technological solutions for the development of companies of different sizes and branches.

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Our people management involves innovative procedures for attracting and retaining talent, as well as promoting professional and leadership development, all of which are detailed throughout this report. Mindful of the inherent characteristic of the technology industry, which faces a shortage of labor, we have been working more and more, including by entering into external partnerships, on robust training programs. This turns LWSA into a real school, creating internal impacts in terms of productivity, efficiency and innovation, as well as social and economic impacts.

After five years of implementation, our Inclusion and Diversity (I&D) strategy is advanced in the sector and has received relevant external recognition. This drives us to continue monitoring and improving processes through the I&D Census, which has been taken since 2019. We must highlight the progress made in the Women and LGBTQIAPN+ pillars. Between 2022 and 2023, female representation in our workforce increased by 0.7 p.p. and 3.2 p.p. of leadership positions are held by women, reaching 39.1% of the total workforce, according to HR's active employee data base. In the 2023 Census, 20% of our staff self-reported as LGBTQIAPN+.

In order to direct our investments effectively, we launched the 2023 Private Social Investment Guidelines and Assumptions.

After the publication of this document, incentives have been directed towards projects aligned with the 2030 goals set by the Company, guaranteeing strategic social investments that link our business model to our purposes.

Since the IPO, we have been listed on B3's Novo Mercado, the highest corporate governance segment in Brazil, which, combined with periodic internal and external audits, and practices carried out from even before we became public, allows us to conduct reliable risk management and tax control processes as well as follow ethical and integrity procedures.

With an extensive ESG agenda, driven by our senior management's full commitment and accelerated by demands from the market and our employees, we believe we are well positioned to respond to the immense challenge of creating significant impacts for environmental sustainability and social and economic development, through solid, long-term management.

Fernando Cirne, LWSA's CEO



WHO WE ARE



We are LWSA, a publicly held company registered with the Brazilian Securities and Exchange Commission (CVM, in Portuguese). We are currently one of Brazil's largest technology groups. We started out as a web page hosting company and, over 26 years of operations, we have kept up with the dynamism of the technology and e-commerce market to become a Software as a Service (SaaS) business model that gathers e-commerce platforms.

We were one of the pioneers in Business to Business (B2B) solutions for digital business transformation in Brazil. With our integrated solutions system, we help our customers to start operating and thrive through technology.

As a result of going public on B3 in 2020, in recent years we have been able to acquire companies that have complemented our portfolio, implementing a strategy that we believe to be a winner in the sector and that has allowed us to continue focusing on innovation to anticipate market demands. Thus, we have structured a robust brand ecosystem that offers comprehensive and modular solutions for all sizes of business, so that our products and services are present throughout the customer journey.

We are listed on B3's Novo Mercado, Brazil's highest corporate governance segment, and therefore have mandatory policies and committees for this governance level. Our management comprises Company's founders and experienced market professionals who have held senior positions in other relevant companies in their respective sectors.

We are headquartered in São Paulo (SP) and have offices in nine other Brazilian cities: Belo Horizonte (MG); Bento Gonçalves (RS); Curitiba (PR); Florianópolis (SC); Marília (SP); Novo Hamburgo (RS); Pelotas (RS); Porto Alegre (RS); and Ribeirão Preto (SP).

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Brand repositioning

Integrating the group's various brands, in November 2023, we announced a change in our identity. We dropped the name Locaweb Company to take on the brand LWSA, the Company's stock ticker on B3.

This repositioning is an important step following the acquisition of 14 companies since 2020, as they have become part of our solution ecosystem and product portfolio. Thus, the LWSA brand ensures belonging and unity to create an integrated corporate culture. It represents our range of tools in our five business areas and make them evident to the market.

With this step, we seek to boost customer success through a more integrated journey, in addition to optimizing our business indicators, bolstering our cross-selling strategy, increasing our average revenue per ticket, reducing cancellation rates and minimizing acquisition costs for customers by allowing them to preview and try all solutions we offer for their business.

2023
we announced
a change in
our identity

14
companies
acquired
since 2020

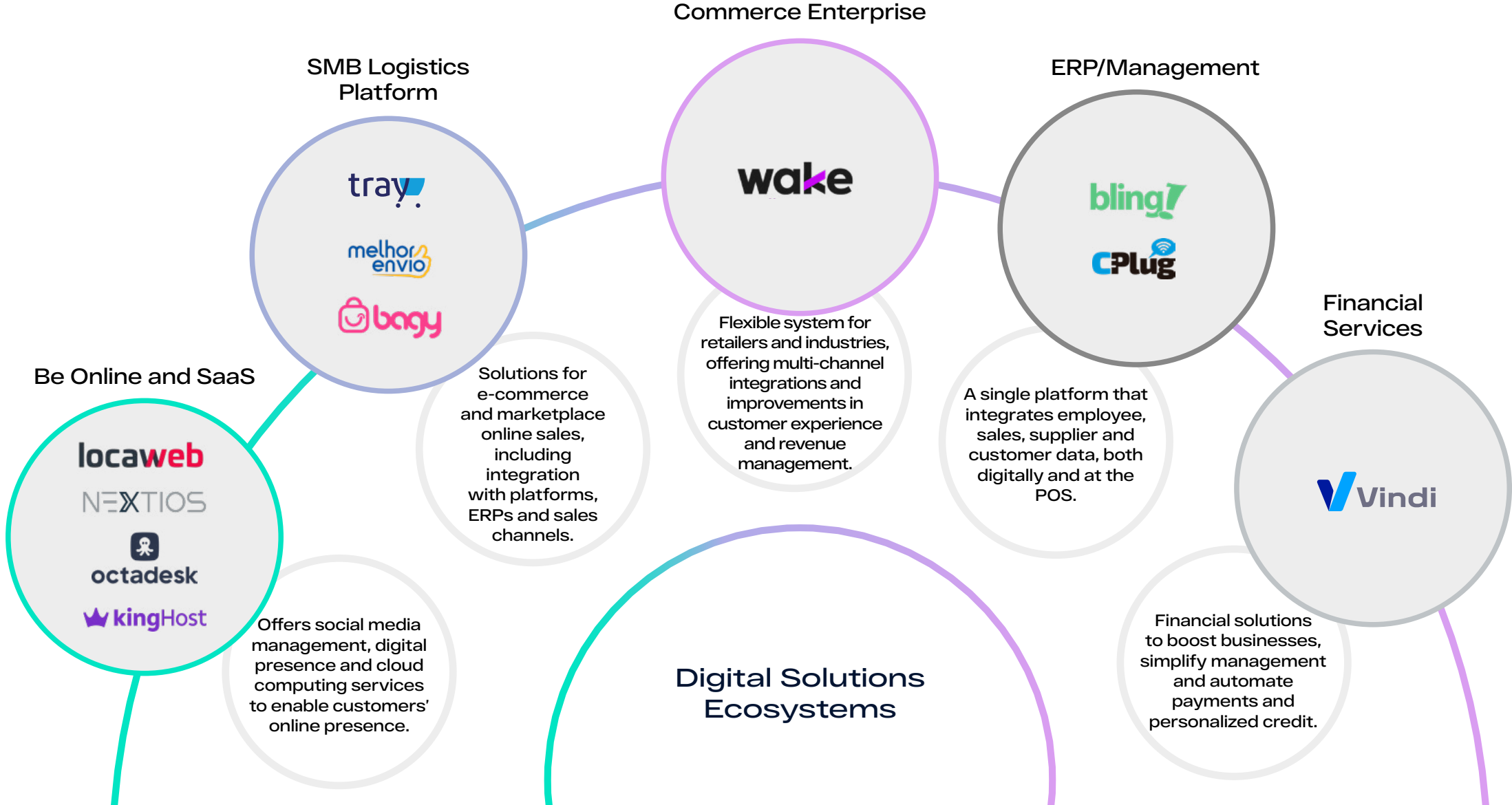
LWSA is an ecosystem ripe of possibilities for customers and potential customers, as well as for employees, who have access to more professional opportunities as they can move freely between the group's various companies.



Business verticals and brands

GRI 2-6

We operate in two major business segments, namely Be Online and Software as a Service & Solutions (“Be Online/SaaS”) and Commerce. Both are subdivided into five macro-segments within our organizational structure, as follows:



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Materiality

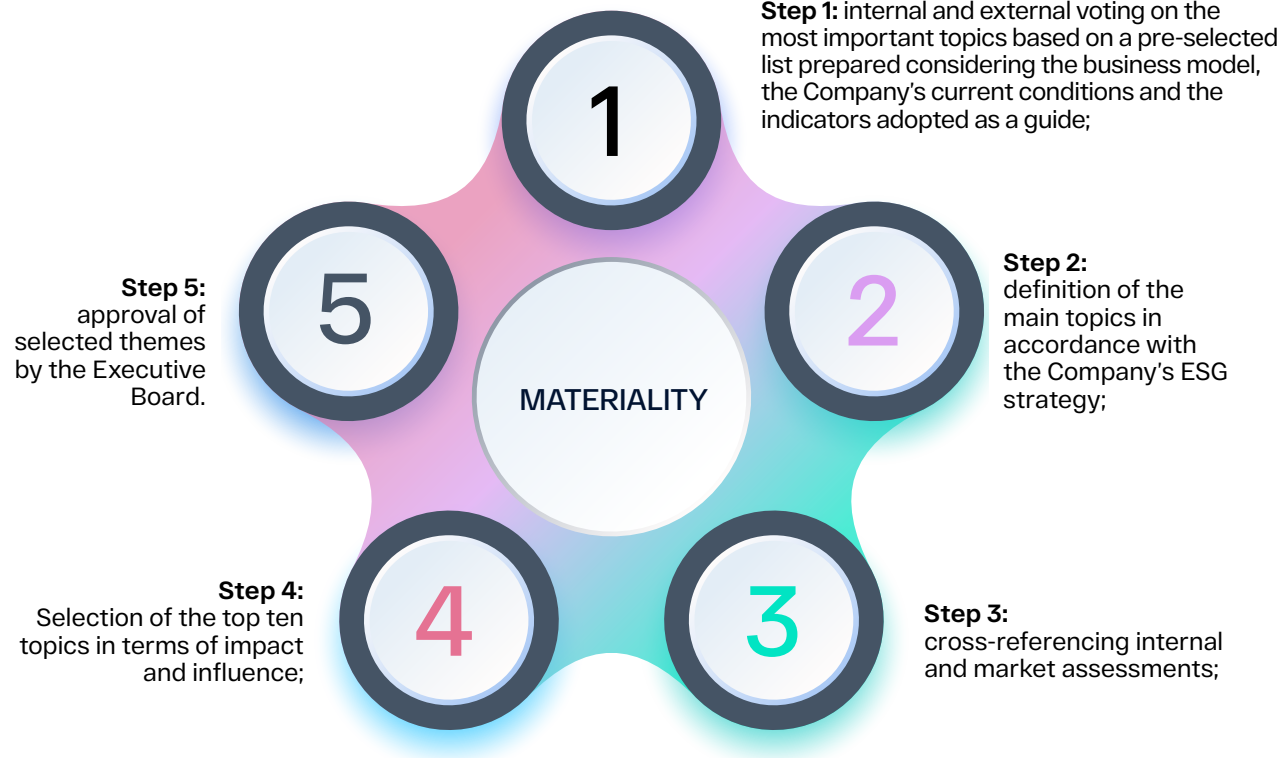
GRI 3-1, 3-2

To guide the Company's strategic planning, in 2022, we sought to prepare our Materiality Matrix. The definition of the material topics relevant to LWSA included five phases and considered the points of view of the Company's senior management; employees; investors and investment funds; and suppliers, as well as benchmarking studies.

Then, the impacts of activities and business relationships on each area were assessed in detail.

They can be classified as negative or positive, actual or potential. In the report, topics were prioritized based on the magnitude of the impact, the likelihood of occurrence and the Company's ability to influence or mitigate them.

Materiality process



Material topics remain the same as in the previous reporting period, as follows:

- Promotion of diversity and inclusion at the Company;
- Energy management;
- Environmental preservation;
- Promotion of entrepreneurship in the communities;
- Economic performance;
- Integration of environmental considerations in data center management.
- Employee management;
- Security, customer privacy and information management;
- Digital inclusion;
- Ethics, business governance and competition;

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Estudo de Impactos

● direct ○ indirect

Material topic	Impact	Global Compact	Impacted stakeholders	ODS
Promotion of diversity and inclusion at the Company	The technology industry often lacks representation of diverse groups in its workforce. For this reason, LWSA incorporates diversity and inclusion into its strategy, aimed at building up the Company's reputation and preventing legal risks, such as penalties for non-compliance with employment quotas for people with disabilities. Proactive management of these topics is key to attracting diverse talent, improving decision-making and strengthening the brand's image. Through its I&D Corporate Volunteering Program and recognitions such as GPTW and IDIVERSA B3, LWSA is on the right track to promote a responsible corporate culture.		Employees LWSA Investors ● ● ○	
Promotion of entrepreneurship in local communities	LWSA's mission is to help businesses start operating and thrive through technology. Therefore, the Company sees the opportunity to have a positive impact on entrepreneurs in the local community, thus contributing to the economy of families as well as the country.		Community LWSA ● ○	
Employee management	Several programs foster employee development. Balancing personal and professional life, as well as health and well-being in the workplace, are priorities in people management. Therefore, we offer health, education and quality of life benefits. Turnover rate is a challenge for the entire industry, as such, LWSA implements talent management policies and practices focused on developing and retaining its employees.		Employees LWSA Investors ● ● ○	
Ethics and governance in business	The Company's policies, whistleblowing channel and training programs aim to guide ethical and upright behavior in order to mitigate possible negative impacts such as violations of the Code of Ethics by employees, business partners and suppliers.		LWSA Partners Suppliers ● ● ● Employees Investors ● ○	
Energy management	The greatest environmental impact in the technology industry lies in the high consumption of electricity, due to the use of and need for constant cooling of data centers. LWSA has implemented measures to minimize this impact, such as the frequent replacement of equipment and the purchase of renewable energy for its data center. In addition, the purchase of energy on the free energy market leads to cost reduction.		LWSA Environment ● ●	

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● direct ○ indirect

Material topic	Impact	Global Compact	Impacted stakeholders	ODS
Economic Performance	Good economic performance can have positive impacts on the Company, such as strengthening its corporate image; attracting investors, thus supporting growth; as well as boosting revenue growth and healthy profit margins and making it possible to seize innovation opportunities. Good management of this topic is key to avoid investor distrust, which could have a negative impact on LWSA.		LWSA Investors	
Security, customer privacy and information management	Confidentiality in managing customer and employee information is an ongoing concern for LWSA, as interference or error in customer privacy or security can lead to negative impacts, such as reputational damage and regulatory penalties. The Company has structured processes that help mitigate potential negative impacts and create positive ones, such as enhancing partnerships with customers (high-level contracts) and operational efficiency.		Customers LWSA Investors	9 INDUSTRY INNOVATION AND INFRASTRUCTURE 12 RESPONSIBLE CONSUMPTION AND PRODUCTION
Environmental preservation	LWSA's climate strategy is to be Carbon Neutral by 2030, seeking to contribute to reducing GHG emissions through operational improvements, such as reducing energy consumption. With regard to waste generation, the Company recycles and reuses electronic equipment and machinery. As a positive impact, we have conserved an area of 40,000 m ² of native forest within our headquarters.	 	LWSA Environment	12 RESPONSIBLE CONSUMPTION AND PRODUCTION 13 CLIMATE ACTION
Integration of sustainability considerations for data center needs	Acknowledging the impacts of high energy consumption by data centers, LWSA has adopted several solutions aimed at reducing and optimizing energy consumption, in addition to purchasing renewable energy.		LWSA Environment Customers	9 INDUSTRY INNOVATION AND INFRASTRUCTURE 12 RESPONSIBLE CONSUMPTION AND PRODUCTION
Digital inclusion	LWSA seeks to develop social inclusion in different social groups, enabling access to new technologies and employability (in the Technology field) for young people at the beginning of their careers and in situations of social vulnerability, through Internship, Youth Apprentice and Conectaê Programs. Quero Ser Dev trains junior level programmers to start their careers as software developers. Ao inves da frase marcada. Understanding that digital products, such as payment methods, may not be user-friendly for the elderly and people with disabilities, the Company provides support for this customer pool.		LWSA Community Customers Employees	4 QUALITY EDUCATION 10 REDUCED INEQUALITIES

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2030 Goals

GRI 3-1, 3-2

In 2023, we ran scenario studies and analyses for preliminary planning of the actions to be carried out in order to achieve our 2030 Goals. The main measures will begin to be implemented in 2024. Our goals are:

Environmental goals

Being a carbon neutral Company – Neutralize the greenhouse gases emissions from all our operations.

We would like to highlight the start of the neutralization of our GHG emissions by purchasing carbon credits (see more in [Environmental management](#)).

Related SDGs:



Social goals

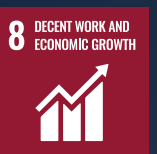
Equal pay – Eliminate pay disparity between genders, races or ethnic groups. In 2023, we prepared a preliminary diagnosis of the salaries of managers (officers, managers, coordinators and technical leaders) at units with more than 100 employees. Our goal is to detail and understand the differences in salaries related to gender and race, isolating factors such as seniority and performance, at all hierarchical levels and units of the Company (see more in [Compensation and equal pay](#)).

Related SDGs:



Fighting disparities through quality education – Quality education as a tool for reducing inequalities. In 2023, we began scenario studies to support potential actions.

Related SDGs:



Governance goals

Mapping the entire supply chain – Being alert to human rights violations or corruption cases in our supply chain in relation to current legislation and regulations. Actions are to be adopted as from 2024.

Related SDGs:



Highlights



+ **700** mil
active customers in 2023

+ **3,800**
employees



+ **26.5%**
E-commerce platform
subscription revenue
increased in 2023

+ **18.5%**
E-commerce ecosystem
revenue increased in 2023



**Brand
repositioning**

Launch of
Wake

Increased representation of women and black people in the workforce

GPTW: Recognition in the diversity ranking, in the Women, Ethnic-Racial and LGBTQIAPN+ categories

First mapping of scope 3 in the greenhouse gas (GHG) inventory.

First offsetting of emissions by purchasing carbon credits



Purchase of 100% renewable energy to supply the headquarters and data center.

Awards

- **2023 Teva Women in Leadership Index** – 52nd position
- **GPTW 2023** – Women, Ethnic-Racial and LGBTQIAPN+ categories
- **Gupy Seal** – 2023 Company that gives Feedback
- **FEEEx Certificate** – 2023 Organizational Climate
- **FEEEx Certificate** – 2023 Great Places to Work
- **Future Law awards for the:** Cosmos Project and Training on the Brazilian Data Protection Law (LGPD, in Portuguese)
- **AB2L Gold Seal** for Legal Departments
- **Intelijur Award for:** the LGPD in 90 Days and Corporate Simplification practices
- **Finalist in the 3rd edition** of Brazil's Leading Lawyers Awards (BRALLAW)
- **Reclame aqui:** Locaweb was ranked first and KingHost was ranked fourth in the Host category



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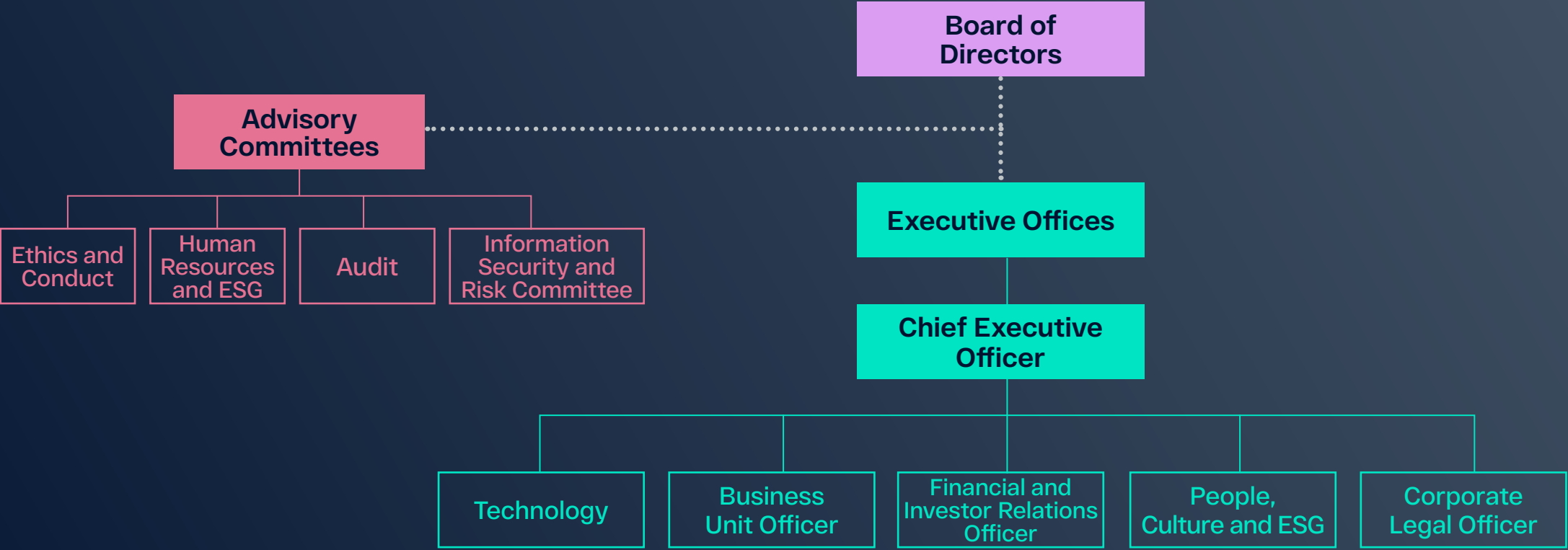
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Corporate structure



GOVERNANCE

Board of Directors

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

The Board of Directors is our statutory joint decision-making body. It is responsible for defining business policies, including long-term strategies, supervising the management of the Executive Board, and assessing and guiding due diligence to identify and manage risks and opportunities, including those related to ESG pillars. The responsibilities and commitments of each director are described in the [Reference Form](#).

The Board of Directors is made up of a minimum of five and a maximum of eight members elected by the Annual Shareholders' Meeting (ASM) for a unified two-year term of office, re-election being allowed. The composition of Board of Directors is currently as follows:



Gilberto Mautner

Gender
Men

Executive or non-executive member
Chairman (in 2023)

Independence
No

Tenure
August/2025



Ricardo Gora

Gender
Men

Executive or non-executive member
Vice-Chairman (in 2023)

Independence
No

Tenure
August/2025



Claudio Gora

Gender
Men

Executive or non-executive member
Sitting member

Independence
No

Tenure
August/2025



Andrea Gora Cohen

Gender
Women

Executive or non-executive member
Sitting member

Independence
No

Tenure
August/2025



Flávio Benício Jansen Ferreira

Gender
Men

Executive or non-executive member
Sitting member

Independence
Yes

Tenure
August/2025



Manuela Vaz Artigas

Gender
Women

Executive or non-executive member
Independent Member

Independence
Yes

Tenure
August/2025



Luiz Otavio Ribeiro

Gender
Men

Executive or non-executive member
Independent Member

Independence
Yes

Tenure
August/2025



Carlos Elder Maciel de Aquino

Gender
Men

Executive or non-executive member
Independent Member

Independence
Yes

Tenure
August/2025

Note: Information regarding other positions and commitments of members is available on [LWSA's Investor Relations website](#).

Currently, 50% of the members of our Board of Directors are independent¹, in line with the Company's current moment, as LWSA is fully committed to a long-term vision that guarantees business resilience. Furthermore, since 2007, the decisions of the Board of Directors have been made by consensus, which demonstrates respect and an open dialog on the part of the controlling shareholders and the independent directors.

The Chairman of the Board of Directors is one of LWSA's controlling shareholders. He does not, however, hold any other position in the Company. In his absence or temporary impediment, his duties are carried out by the Vice-Chairman. If he is absent or unable to fulfill his role, his duties will be carried out by one of the Board members, to be appointed by the Chairman.

The members of Board of Directors are not Executive Officers, but they serve on the Advisory Committees.

All the Board members have skills related to the Company's material topics, which has added value in managing risks and identifying opportunities on these agendas.

Since 2007, the decisions of the Board of Directors have been made by consensus.

50% of the members of our Board of Directors are independent.

¹ According to the Novo Mercado regulations, at least 2 or 20% of the Board members – whichever is greater – must be independent. The decision on whether nominees are independent or not is made by the Shareholders Meeting that elects them.



Nomination and selection

GRI 2-10

The members nominated to the Board of Directors must comply with the following parameters, in addition to the applicable legal and regulatory requirements: (i) engagement with and commitment to the Company's values and culture; (ii) commitment to the provisions in the Code of Ethics, as well as in the other applicable codes, policies and regulations; (iii) adequately assuming the role and responsibilities arising from their position.

Knowledge of the best corporate governance practices, corporate legislation, regulation and risk management are also taken into account, in order to guarantee that the Board of Directors has members with diverse qualifications and can meet the demands of our business.

We follow the Novo Mercado Regulations, which prohibit the election of

Knowledge of the best corporate governance practices, corporate legislation, regulation and risk management are also taken into account.

independent directors who i) are direct or indirect controlling shareholders of the Company; (ii) have voting rights at Board of Directors' meetings bound by a shareholders' agreement on matters related to the Company; (iii) are the spouse, partner or relative up to the second degree of the controlling shareholder, member of management, or member of management of the controlling shareholder; and (iv) have been an employee or Executive Officer of the Company or its controlling shareholder in the last three years.

Candidates for the position of independent director must submit a statement to the Board of Directors proving that they meet the independence criteria set out in the Novo Mercado Regulations. The Board of Directors validates the candidate's statement of independence, which is presented in the management proposal for the Shareholders Meeting that elects members of management.



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Board of Directors' performance evaluation

GRI 2-18

The performance of the Board of Directors is evaluated once a year by all the directors, including the independent ones.

The evaluation covers:

- Participation in the analysis and debate of the subjects discussed;
- Active contribution to the decision-making process;
- Commitment to the fulfillment of the Company's duties, values and goals.

The consolidated results of the evaluation of the Board of Directors and its directors are disclosed to all Board members, as are the results of the individual evaluations of the Chairman and Chief Executive Officer.

The results of the individual evaluations of Board members will be made available to the person concerned and to the Chairman of the Board of Directors, and are also discussed in individual feedback sessions. The next steps are defined by the Chairman of the Board of Directors.

Elected positions

We have a Nomination Policy that establishes the guidelines, criteria and procedures for selecting people for elected positions, in accordance with the best corporate governance practices.

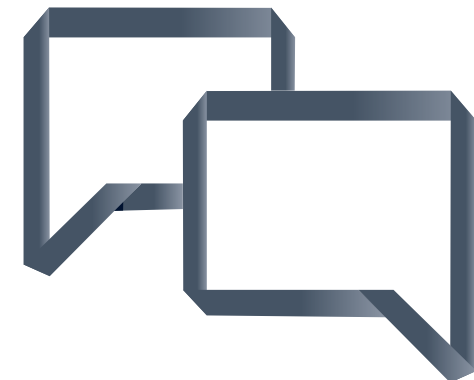
Nominees must be highly qualified professionals with relevant professional, technical and academic experience, as well as an unblemished reputation. At the time of nomination, a background check is carried out to ensure compliance with integrity criteria.

The selection process looks for candidates with knowledge and experience in the business sectors in which the Company operates or will operate. As a result, nominations should be based on an analysis of the needs of the Board of Directors, the Statutory Executive Board and the Advisory Committees to ensure a diverse membership, taking into account experience, skills, conduct, background, age and gender.

100%

All the Board members attended all the Board of Directors' meetings held in 2023.

In 2023, 25% of the Statutory Executive Officers are women. We have a specific committee (Corporate Volunteering Program) aimed at developing the topic of Inclusion & Diversity (I&D), with an annual Census that allows us to map scenarios and evaluate internal policies.



Impact management

GRI 2-12

The Board of Directors is responsible for supervising and guiding due diligence and other relevant processes to identify, assess and manage risks and opportunities. The main aspects of this role include:

- Approving internal regulations;
- Supervising due diligence;
- Managing risks;
- Communicating and ensuring transparency in the disclosure of reports to the market;
- Engaging stakeholders;
- Evaluating the organization's performance; and
- Developing skills.

In 2023, 22 reports of crucial concerns were submitted to the Board of Directors, all of them referring to behavioral issues. None of them concerned fraud or misconduct by partners or members of management.

Dissemination of good ESG practices

GRI 2-12

The Board of Directors has been an agent in defining strategic guidelines and validating the work plan to integrate good ESG practices into our business agenda and at all levels of the Company. We consider the search for renewable energy sources, the maintenance of best governance practices, the training of skilled labor, as well as fostering the development of Brazilian micro and small companies through technology, to be strategic.

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

In 2023, we structured our first Greenhouse Gas Emissions Inventory, as detailed in **Greenhouse Gas Mitigation** of this report. With the participation of the Board of Directors and other areas of the Company, we are planning actions related to the global challenge of combating the effects of climate change, defining the strategy, approving and monitoring the work plan, and supervising and managing risks and opportunities.

Fiscal Council

The Fiscal Council is a supervisory body independent of management that reports to the shareholders. Our Fiscal Council is not permanent and must be installed by decision of the Shareholders' Meeting. Its last term of office ended in April 2023. At the Shareholders Meeting held in 2023, there was no request to install the for that fiscal year.

It is worth noting that the duties and powers conferred by law on the Fiscal Council cannot be granted to another body of the Company. The members of the Fiscal Council have the power to act individually, despite the collegiate nature of the body. The body shall be made up of three sitting members and an equal number of alternates, all with a unified term of office of one year, elected at the Shareholders Meeting, with a Chairman to be elected by its members at the first meeting following its installation.

Advisory Committees

We currently have four non-statutory committees:

Ethics and Conduct Committee

GRI 2-9

The Executive Ethics and Conduct Committee is a representative, multi-sectoral working group created with the aim of being an advisory, investigative and educational body to address acceptable conduct within the Company. It is

made up of three members elected by the Board of Directors for a unified term of office of two years, re-election being permitted. Members meet when necessary to respond to incidents and actions related to the committee.

Fernando Cirne	Simony Morais	Aline Goldsztejn
Gender Men	Gender Women	Gender Women
Executive or non-executive member Coordinator and sitting member	Executive or non-executive member Sitting member	Executive or non-executive member Sitting member
Independence No	Independence No	Independence No

Note 1: Composition as of December 31, 2023.
 Note 2: Information regarding other positions and commitments of members is available on LWSA's Investor Relations website.

GOVERNANCE

Human Resources and ESG Committee

GRI 2-9

The Human Resources and ESG Committee is a working group that constantly seeks efficiency in human resources, people management and development, attracting and retaining talent, and the Company's compensation. It also plays a strategic role in discussions and actions on ESG guidelines within the Company.

It is made up of six sitting members that meet monthly and are elected by the Board of Directors for a unified term of office of two years, re-election being permitted.

Simony Morais	Gilberto Mautner	Fernando Cirne	Andrea Gora Cohen	Flavio Benício Jansen Ferreira	Manuela Vaz Artigas
Gender Women	Gender Men	Gender Men	Gender Women	Gender Men	Gender Women
Executive or non-executive member Coordinator	Executive or non-executive member Member	Executive or non-executive member Member	Executive or non-executive member Member	Executive or non-executive member Member	Executive or non-executive member Member
Independence No	Independence No	Independence No	Independence No	Independence Yes	Independence Yes

Note 1: Composition as of December 31, 2023.

Note 2: Information regarding other positions and commitments of members is available on LWSA's Investor Relations website.

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Audit Committee

GRI 2-9

It reports to the Board of Directors but has operational autonomy and its own budget approved by the Board of Directors to cover its operating expenses. In line with the Novo Mercado Regulations, it has specific internal regulations, also

approved by the Board of Directors, which detail the Committee's functions and operating procedures.

Its duties include continuously and systematically supervising the Company's risk identification pro-

cedures and internal control systems; monitoring the quality and integrity of financial reports; ensuring compliance with legal, statutory and regulatory standards; and overseeing the work of independent auditors.

It is made up of three members that meet monthly and are elected by the Board of Directors for a unified term of office of two years, re-election being permitted.



<p>Carlos Elder Maciel de Aquino</p> <p>Gender Men</p> <p>Executive or non-executive member Coordinator</p> <p>Independence Yes</p>	<p>Flavio Benício Jansen Ferreira</p> <p>Gender Men</p> <p>Executive or non-executive member Non-statutory member</p> <p>Independence Yes</p>	<p>Fernando Dal-Ri Murcia</p> <p>Gender Men</p> <p>Executive or non-executive member Non-statutory member</p> <p>Independence Yes</p>
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Note 1: Composition as of December 31, 2023.
 Note 2: Information regarding other positions and commitments of members is available on LWSA's Investor Relations website.

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External Assurance

Information Security Risk Committee

GRI 2-9

It is responsible for discussing and proposing projects, initiatives and demands in order to manage risks related to technological threats and information security. It also has the duty to analyze procedures to ensure compliance with laws, internal regulations, policies and procedures applicable to information security.

The Committee develops and manages internal standards and policies in order to standardize existing procedures and guidelines in different areas to avoid technological risks and protect information security. It also promotes the structure of internal controls that enable the understanding of the main risks arising from internal and external factors, in order to ensure that they are efficiently identified, assessed, monitored, controlled and tested.

It is incumbent on the Committee to maintain internal control systems and routines in line with the best market practices, as well as periodic reviews and updates so that any deficiencies are promptly and fully corrected. It implements continuous actions to ensure compliance and the effective operation of

processes related to Technology and Information Security.

The Committee meets quarterly and is made up of up to six members elected by the Board of Directors for a unified term of up to two years, re-election being permitted.

Rafael Abdo	Gilberto Mautner	Gustavo Gomes Salviano	Higor de Araújo Franco
Gender Men	Gender Men	Gender Men	Gender Men
Executive or non-executive member Coordinator	Executive or non-executive member Member	Executive or non-executive member Member	Executive or non-executive member Member
Independence No	Independence No	Independence No	Independence No

Note 1: Composition as of December 31, 2023.

Note 2: Information regarding other positions and commitments of members is available on LWSA's Investor Relations website.

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External Assurance

Executive Board

The Executive Board is made up of a minimum of five and a maximum of twelve members, whether shareholders or not, resident in Brazil, and elected by the Board of Directors. Executive Officers may hold more than one position. They are elected for a two-year term of office, with the possibility of re-election, remaining in office until their successors are elected and take office.

To be nominated by the Board of Directors, candidates must reconcile the interests of the Company and its shareholders, managers and employees, based on ethics and legality. They must also engage with and be committed to the values and culture of the LWSA, commit to the Code of Ethics, appropriately take on the role and responsibilities of their position, as well as having the skills to implement the strategies and achieve the defined goals.



Fernando Biancardi Cirne

Elective position
Chief Executive Officer

Date of investiture
01/12/2023

Term of office
12/01/2025



Rafael Chamas Alves

Elective position
Chief Financial and Investor Relations Officer

Date of investiture
01/12/2023

Term of office
12/01/2025



Higor de Araújo Franco

Elective position
Business Unit Officer

Date of investiture
01/12/2023

Term of office
12/01/2025



Alessandro Dalmédico Gil

Elective position
Business Unit Officer

Date of investiture
01/12/2023

Term of office
12/01/2025



Simony Morais

Elective position
People, Culture and ESG Officer

Date of investiture
01/12/2023

Term of office
12/01/2025



Gustavo Gomes Salviano

Elective position
Chief Technology Officer

Date of investiture
01/12/2023

Term of office
12/01/2025



Aline Goldsztejn

Elective position
Corporate Legal Officer

Date of investiture
01/12/2023

Term of office
12/01/2025

Note: Composition as of December 31, 2023.

Senior management compensation

GRI 2-19, 2-20, 2-21

Our **Compensation Policy** has been in force since December 2019, when it was approved by the Board of Directors. It applies to members of the Board of Directors, statutory and non-statutory Executive Officers and members of the Fiscal Council (if installed), the Audit Committee and other statutory or non-statutory Advisory Committees.

The aim of the Policy is to establish rules and guidelines for managing positions and salaries; set

criteria for changes; and define responsibilities, procedures and internal deadlines in order to guarantee internal equity, wage justice, attractiveness, and maintenance and retention of talent. The studies and panels to define these elements are carried out by the compensation team and validated by the People, Culture & ESG Vice-Presidency/Office. The considerations of stakeholders (including shareholders) related to the topic are discussed at meetings and recorded in minutes.

In the event of termination, payments follow current labor legislation. Short- or long-term variable compensation is paid according to proportionality rules depending on the type of termination. All executives, including those employed under Brazilian labor laws and statutory executives, are subject to social security legislation.

Compensation may consist of profit-sharing, termination benefits and the following components:

- **Fixed compensation:** recognizing and reflecting the value of the position internally and externally, as well as the individual performance, experience, education and knowledge of the professional;
- **Variable compensation (short-term):** rewarding the achievement and surpassing of Company and individual targets, in line with the budget, strategic plan and the market;
- **Variable compensation (long-term):** (a) strengthening our capacity to attract and retain talent; (b) aligning the interests of our employees with those of our shareholders; (c) sharing risks and gains with our employees; and (d) balancing short- and long-term compensation, with a view to business continuity;
- **Benefits:** offering assistance benefits compatible with market practices.

Compensation Committee

The Human Resources and ESG Committee is responsible for addressing compensation issues, which includes discussing and drawing up the Company's compensation guidelines, in line with best market practices. This Committee is made up of seven members: two independent directors, two sitting members of the Board of Directors and three members of the Company's Statutory Executive Board.

The Board of Directors sets the overall compensation of the Company's management and the members of the Fiscal Council (if installed) and the committees, as well as the monthly compensation of its members and the Executive Board.

Together with the HR Committee, the Board of Directors allocates each part of the compensation. These include fixed, variable and share-based compensation, profit-sharing and benefits.

It is important to note that the three Executive Officers who make up the HR Committee do not vote on matters relating to executive compensation.

The Board of Directors and the Human Resources and ESG Committee participate in the decision-making process on compensation.

Executive selection

The hiring of executives with sign-on 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 can involve short-/long-term variable compensation and/or various service incentives, which can be proportional or set forth in individual agreements between the executives on the outboard.



It is important to note that the three Executive Officers who make up the HR Committee do not vote on matters relating to executive compensation.

Diversity in senior management

GRI 405-1

We currently have two women in our Board of Directors. We monitor the regulations on the subject, and we are improving policies to make progress on the material topic of promoting inclusion and diversity in the Company.

Percentage of individuals within governance bodies, by gender

Gender	2022		2023	
	Total	%	Total	%
Men	6	60%	6	75%
Women	4	40%	2	25%
Total	10	100%	8	100%

Percentage of individuals within the organization's governance bodies, by age group

Age group	2022		2023	
	Total	%	Total	%
Under 30 years old	0	0%	0	0%
30-50 years old	3	30%	3	37.5%
Over 50 years old	7	70%	5	62.5%
Total	10	100%	8	100%

Percentage of individuals within governance bodies, by color or race

Color or race	2022		2023	
	Total	%	Total	%
Black	0	0%	0	0%
Brown	0	0%	0	0%
White	10	100%	8	100%
Indigenous people	0	0%	0	0%
Yellow	0	0%	0	0%
Total	10	100%	8	100%

Percentage of individuals within governance bodies, by People with Disabilities

People with Disabilities	2022		2023	
	Total	%	Total	%
People with Disabilities	0	0%	0	0%
People without Disabilities	10	100%	8	100%
Total	10	100%	8	100%

Ethics and Integrity

GRI 2-15, 2-23, 2-24, 2-25, 2-26, 2-27, 205-2, 205-3 | 3-3 Material topic: Ethics and governance in business

Our work is structured around non-negotiable pillars of political commitment to guaranteeing and protecting human rights, freedom of association, the rights of children and adolescents and diversity, as well as fighting against corruption and any form of discrimination and prejudice.

These commitments are based on the Universal Declaration of Human Rights and the UN Global Compact, to which we have been signatories since December 2021. Thus, 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, in order to promote responsible and sustainable business practices.

We have incorporated the governance of these principles into a number of Company policies aimed at guiding ethical and upstanding behavior in our activities. **Our policies** have policies been appro-

ved by the Board of Directors and are accessible to employees, customers, suppliers and partners. They are regularly updated and, when necessary, benchmarks are carried out, or third-party companies are hired to guide us in best practices.

It is worth mentioning that the policies apply to all LWSA group companies, including the dozens of companies acquired in recent years, which are fully integrated into the group. Therefore, the Company's governance and compliance are centralized. Training on ethical conduct is given to all employees and senior management.

We have a Code of Ethics (see the **Code of Ethics section**) and a **Related-Party Transaction and Conflicts of Interest Policy**, designed to guide behavior and conduct to meet legal requirements and ensure the transparency, loyalty and propriety of LWSA's management and employees. These rules are imposed to ensu-

re that decisions involving transactions with related parties and situations with potential conflicts of interest are always taken in the interests of the Company and its subsidiaries and shareholders; and to prevent any decision from being taken with the intention of conferring a private benefit on any member of management, employee or related person or entity.

For this reason, executives, management and Executive Officers have a duty of care. They must account for their actions in a clear, concise, comprehensible and timely manner, taking full responsibility for the consequences of their acts and omissions. In situations of actual or potential conflict of interest, the member of management or employee must promptly report the case to the Board of Directors, the other members of management or the Ethics Committee, being prevented from proceeding with and mediating the transaction in question.

Training on ethical conduct is given to all employees and senior management.

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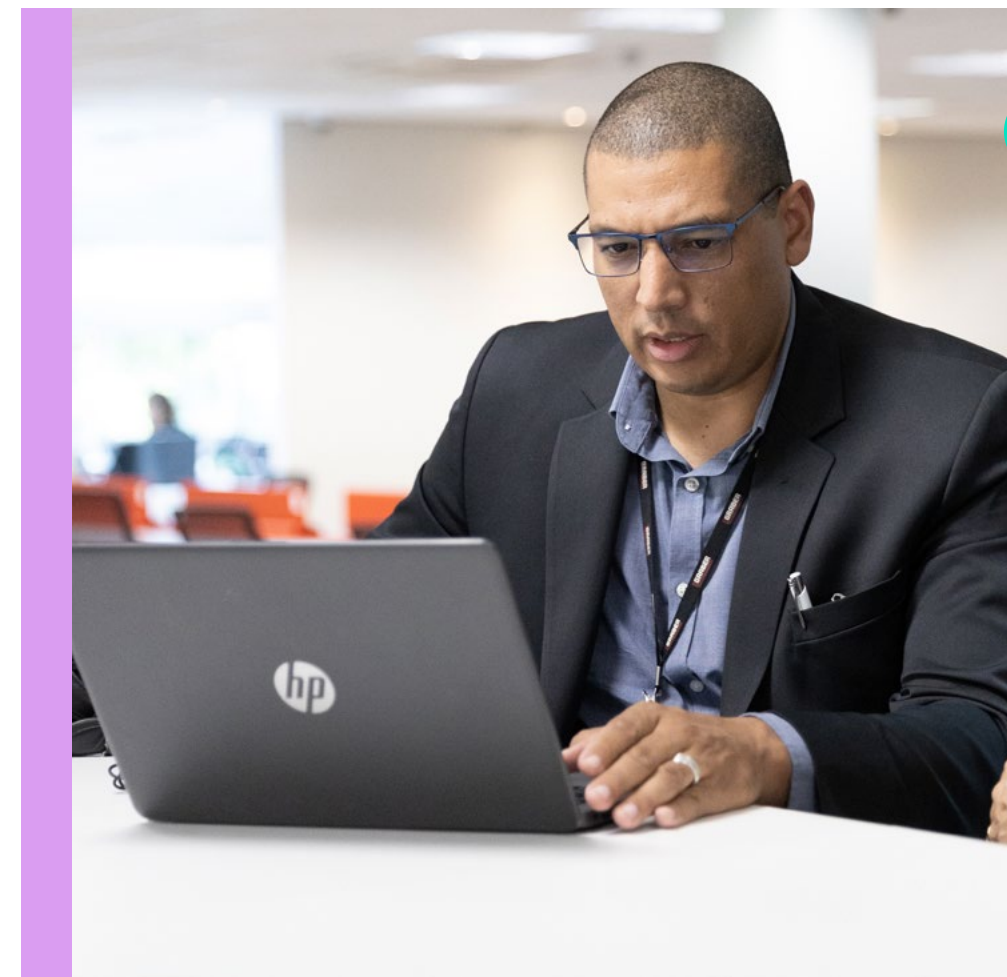
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External Assurance

Audits on ethical standards

We guard against unethical conduct through several layers of auditing of our activities to ensure that our processes adhere to best practices. In addition to the Audit Committee, described in item **Advisory Committees**, we carry out an annual internal audit with Magalhães Andrade and quarterly external audits with KPMG.



In 2023, the Company had two contracts in force with related parties. They include:

1. Property lease agreement with MG4 Participações Ltda.

The partners of this company are Michel Gora, Ricardo Gora, Gilberto Mautner, Claudio Gora and Andrea Gora Cohen, LWSA's current controlling shareholders, who jointly hold the entire share capital of MG4 Participações Ltda.

Amount involved
R\$ 1,019,536.49

Existing balance
R\$ 61,525,765.70.

2. Property lease agreement with WW Marques Intermediação de Negócios Ltda.

The partner is Willians Cristiano Marques, a member of management of Tray Tecnologia em E-commerce Ltda., a subsidiary of LWSA.

Amount involved
R\$ 89,794.32

Existing balance
R\$ 3,588,013.82

Note: amounts refer to the end of the fiscal year on December 31, 2023.

Relations with the government and regulatory bodies

We maintain a position of independence, collaboration and respect for laws and regulations in our relationship with these agents. We comply with the legislation that regulates the participation of companies in political affairs and in relations with the government and regulatory bodies, including with regard to contributions to election campaigns.

Relations with suppliers, service providers and business partners

It takes into account the legitimate interests of all those involved but is always based on technical parameters. We do not allow any type of undue advantages obtained through the manipulation of information, intimidation, coercion, duress or any artificial creation of situations of dependence on another involved party, including unfair competition practices or situations characterized as a conflict of interest with our business.

Equal information is guaranteed to all potential suppliers and service providers during the quotation or tendering process. As a rule, we prohibit employees from participating in decision-making processes for contracting suppliers and service providers with companies whose partners or members of management are related to them.

Our suppliers must, above all, be reputable; comply with laws and regulations, as well as with LWSA's regulations; observe the confidentiality of information at all times; and not use child labor or forced labor.

Related Global Compact Principles:



Code of Ethics

As a preventative measure against potential negative impacts, all new hires have access to and are expected to read the Code and undergo training and an assessment afterwards.

Our **Code of Ethics** is a document of almost 90 pages, written in simple language and with practical examples for day-to-day work, in which we formally declare the ethical principles and standards of professional conduct expected, based on our internal policies and regulations, which should guide the activities of all employees, without distinction of position, in their relations with other employees, shareholders, customers, suppliers, partners and government agencies.

Self-employed professionals, consultants, agents and sales representatives must apply the same ethical principles and standards of conduct when carrying out their activities on

our behalf, as must suppliers, customers and partners in their dealings with LWSA.

The document covers the principles and commitments of conduct; ethics and whistleblowing management; commitment to ESG; relationships; information security; use of resources; and preservation of assets.

As a preventative measure against potential negative impacts, all new hires have access to and are expected to read the Code and undergo training and an assessment afterwards. As a way of guaranteeing adherence to the program, employees must obtain a score of 80%

of correct answers to pass. For unit business partners and suppliers, there is a standard clause in all contracts stating that they accept the Code of Ethics.



In 2023, we carried out a campaign encouraging all employees to review and accept the Code of Ethics, aiming to update their knowledge and enable them to take in the recent changes to the Code. The result was extremely positive: 93,6 of employees reached or exceeded the minimum 80% of correct answers in the assessment, demonstrating the Company's success in promoting a strong ethical culture, in which integrity is a priority for everyone. The Executive Board has received a list of employees who have not confirmed their acceptance of the updated Code of Ethics.

Whistleblowing channels

Cases of non-compliance with the guidelines of the Code of Ethics or other policies can be reported to the **Whistleblowing Channel**, or by phone at 08005913128. Whistleblowers may remain anonymous. We do not accept retaliation, reproaches or discrimination against people who ensure compliance with the document.

The Channel is disseminated to employees when they are hired and during refresher training on the Code of Ethics, when an assessment is car-

ried out. It is also included in all contracts signed by the Company.

Complaints are received externally by Alliant, which classifies the complaint as having a “low, medium or high” impact and suggests a course of action. After external processing, the report is received by the Company’s Compliance department, which can launch investigations and conduct interviews. Based on the report from the Compliance department, the Ethics Commit-

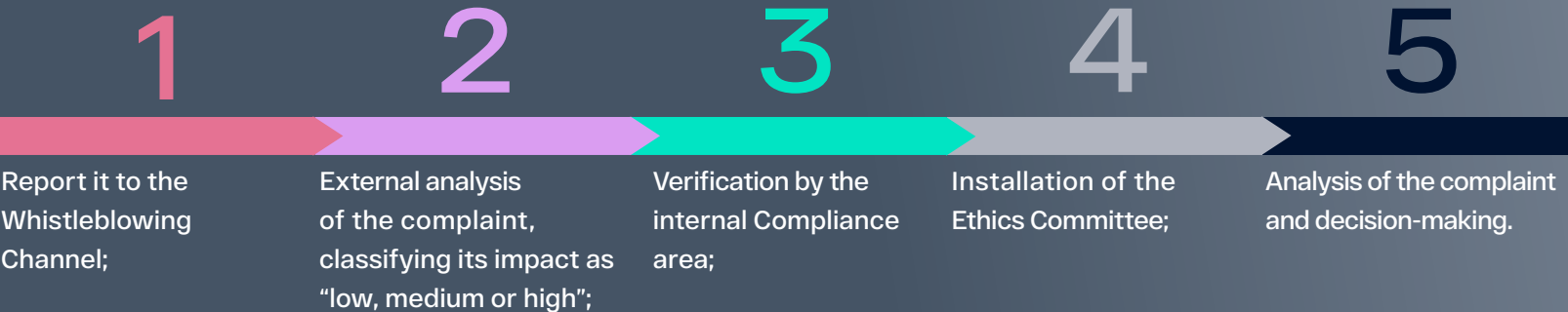
tee (made up of the CEO, the People, Culture and ESG Officer and the Chief Legal Officer) analyzes and makes a decision, which can be to dismiss the complaint or apply penalties – feedback, warning or dismissal for employees and termination of the contract for business partners or suppliers.

The CEO and the Executive Officers do not receive complaints relating to their respective activities. Complaints concerning the CEO are analyzed by

the Chairman of the Board of Directors, while complaints related to the Chief Legal Officer are dealt with by the HR Officer and vice versa.

Complaints about accounting or tax issues or those involving the Company’s directors and executive officers are also forwarded to the Audit Committee, which will assist the Ethics Committee’s decisions.

In 2023, 22 complaints were received, all of which were resolved in the same year.



Related Global Compact Principles:

Tax control and transparency

In order to ensure tax compliance and strict fulfillment of the main and ancillary tax obligations, we adopt rigorous control practices. Our priority is the correct assessment and payment of taxes due in all jurisdictions where we operate.

In tax management, our work is guided by the best practices in the sector and structured around periodic reviews of tax positions and detailed technical analysis. Our aim is to guarantee the faithful application of legal regulations, maintaining a constant commitment to fiscal transparency and providing complete and accurate information for efficient management.

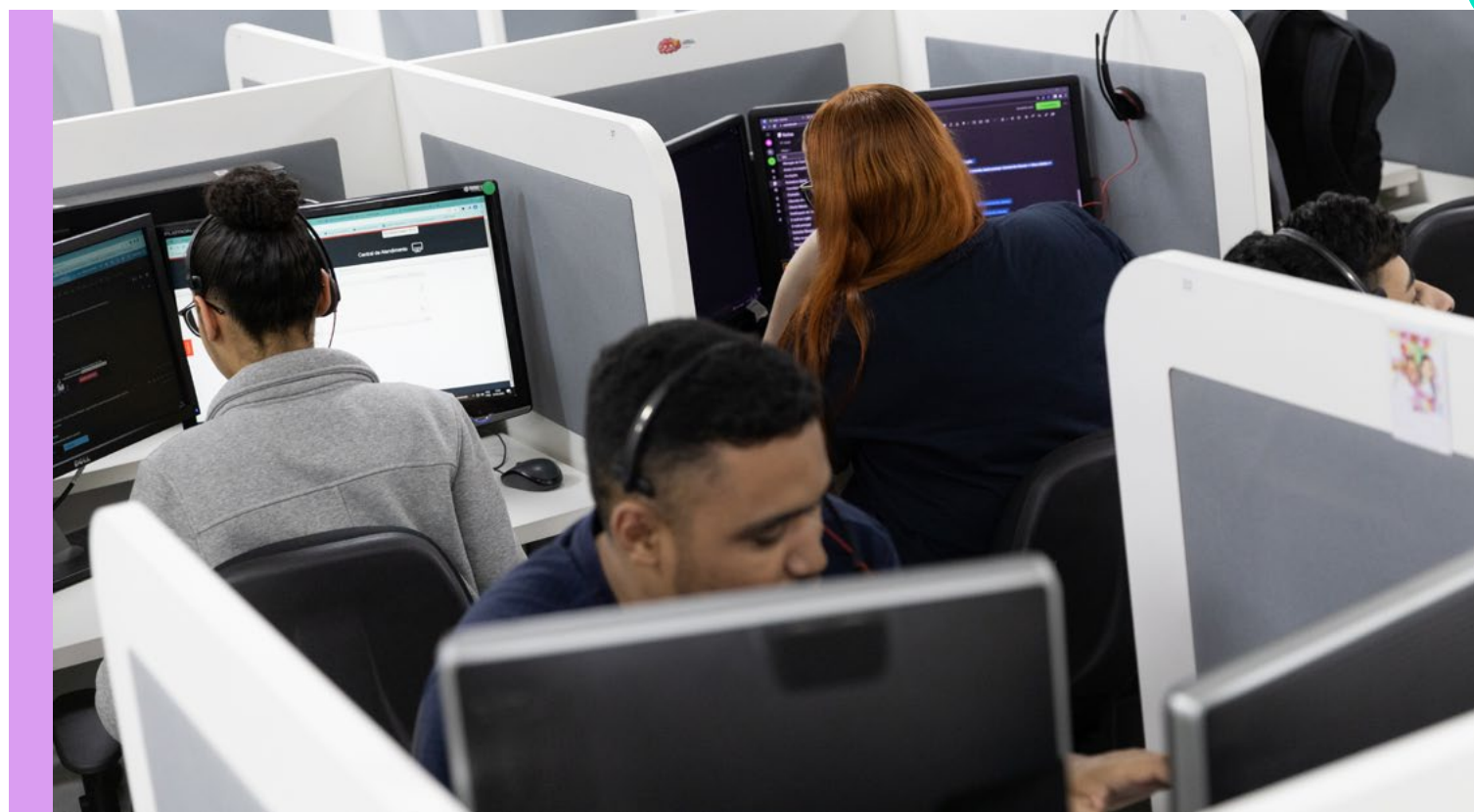
All information on taxes paid by the Company is presented in the financial statements published quarterly. In addition, our internal policies ensure that the conduct of all employees is in line with ethical and legal principles.

Given the complex Brazilian tax environment, tax liabilities are managed focusing on the correct application of tax legislation, with the support of

renowned law firms specializing in this area and monitored regularly by the Audit Committee.

We undergo an annual external and independent audit designed to confirm the accuracy of the data provided in the accounting and financial statements and to guarantee the accuracy of tax risk management control reports and the appropriate accounting reflections.

We maintain internal control systems and routines in line with the best market practices and carry out periodic reviews and updates to correct any system deficiencies. In addition, we implement ongoing actions to ensure compliance and the effective operation of processes.



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External Assurance

Risk management

GRI 205-2

In each decision, we weigh benefits, negative aspects and associated risks, considering the relationship between impact and mitigation, in order to develop appropriate contingency and continuity plans for our business.

In risk management processes, we use the guidelines established by the Brazilian Institute of Corporate Governance (IBGC, in Portuguese) and the COSO internal control model as parameters. With regard to the latter, we consider the following definitions:

- **Internal environment:** includes the Company's organizational structure, human and physical resources, culture and values.
- **Goal setting:** goals are set before identifying potential situations that could affect their achievement.
- **Event identification:** events that could jeopardize the achievement of these goals are identified. They can be classified as risks, opportunities or both.

Events that could adversely impact our goals can be identified in various ways: periodic internal audits; communications made by employees or warnings issued by monitoring systems; customer reports of problems with their products or services; and complaints made through the external channel set up for this purpose.

Related Global Compact Principles:

Risk assessment

The identified risks are assessed according to the probability of occurrence and their impact on the business, including the Company's image and reputation. They are analyzed in order to determine how they will be managed and how they should be associated with the goals they can influence. We use the Risk Matrix, described below:

- **Response:** once the risks have been identified and assessed, the possible responses are evaluated: avoid, accept, reduce or share.
- **Control activities:** procedures are established and implemented to ensure that responses to identified risks are carried out in a timely and efficient manner.
- **Information and communication:** effective communication flows through the Company in all directions.
- **Monitoring:** monitoring is carried out through ongoing management activities, independent assessments or a combination of these two procedures.

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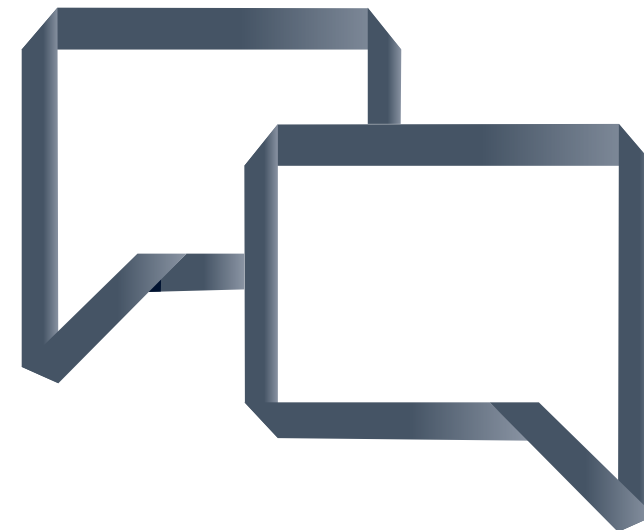
The risks are divided into the categories described below, according to the probability of occurrence and the expected level of impact on the achievement of the Company's goals:

- **Operational and technological risks** arise from failures, errors, deficiencies and/or inadequacies in internal processes, people management and the technological environment.
- **Financial risks** arise from unanticipated impacts on the economic environment that affect revenue from the Company's products and services.
- **Compliance risks** are caused by failure to comply with laws, rules, regulations and Company policies.
- **Corporate risks** include the main strategic, operational, financial, regulatory, market, liquidity and credit risks.
- **Strategic risks** are those arising from the implementation of an unsuccessful or ineffective strategy that fails to achieve the desired returns.
- **Regulatory risks** include those resulting from changes in regulations and the actions of regulatory bodies, at an international or national level, which may result in increasing competitive pressure and significantly affect the efficient management of our business.
- **Image risks** are those that may cause damage to the Company's reputation, image, credibility and/or brand.

Risk of corruption

To avoid exposure to risks related to acts of corruption, our Code of Ethics addresses topics related to Law 12,486/2013 (Anti-Corruption Law). We also have internal regulations and policies, such as the **Related-Party Transactions and Conflict of Interest Policy**. These documents are available to all employees, business partners and suppliers. In 2024, we will publish our Integrity and Consequence Management Policy, which will address anti-corruption, bribery and consequence management topics.

In 2023, all the members of the governance body and employees of all professional categories were informed about and trained on the Company's Code of Ethics that includes the anti-corruption topic.





Litigation and remediation of negative impacts

GRI 2-25

To reduce the risk of lawsuits, we have centralized the legal team for all the group's companies and adopted a series of preventive measures, including a thorough evaluation of contracts. We have adopted the Benner system, in which the legal team tracks all proceedings, contracts, requests, doubts and queries, ensuring that the team is proactive and not reactive to litigation. This approach has ensured efficiency, transparency and governance, guaranteeing low litigation rates.

We constantly monitor legal and administrative claims brought by customers and third parties, which enables us to adjust systems and change products and processes, in addition to repairing any damage.

Our success rate in legal disputes is around

80%

Administrative and legal proceedings are received, processed and monitored internally at the Company and handled by an external office. We prioritize data solutions and repairs in the administrative sphere to avoid unnecessary conflict litigation. Out-of-court notifications are dealt with internally, by sending an e-mail to the Company's legal team or opening a ticket (through Reception or Customer Service) in the Benner system.

In all cases, the Company investigates what happened and conducts a technical analysis to correct any errors. The Company's most important proceedings are taken to the Executive Board, the Vice-Presidency and, ultimately, to the Chief Executive Officer. Proceedings are public, except for closed proceedings by court order. We have around 380 lawsuits on different matters – a small volume considering our 700,000 active customers and almost 4,000 employees in 2023. Furthermore, our success rate in legal disputes is around 80%.

Information security

GRI 3-3 Material topic: Security, customer privacy and information management

Information security (IS) is a critical issue and a central topic for us. We adopt strict protocols and invest in technologies to maintain our operations at the highest level of security, as we are the target of hacker attacks due to our presence and the nature of the services we provide. Nevertheless, none of these attacks has been able to break through barriers, impact or cause system unavailability.

Among the security controls in place, we highlight encryption, multi-factor authentication (MFA), perimeter security and constant monitoring of our technology facilities. We are also certified and independently audited every year, under ISAE 3402 Type II, applied to the data center. This international standard seal attests to the effectiveness of the data center's internal security controls and the quality of our internal processes, which ensures compliance with the highest international information security standards.

Internal controls also guarantee the availability of all critical and essential services for the continui-

ty of our operations. We conduct periodic system tests to ensure and guarantee recovery processes.

Our products and services are developed based on our customers' needs, taking into account robust security measures. In the business relationships that support our technology operations, an additional layer of control is implemented and guarantees a shield against unexpected risks.

We have a team dedicated to evaluating security for each potential SaaS provider before signing the contract. These analyses are developed and designed to ensure that all our partnerships are aligned with high ethical, privacy and security standards. Clauses in our business contracts require adherence to technical security and performance standards and requirements.



Impact and risk management

A combination of internal assessments, audits and periodic reviews is adopted to manage impacts and risks related to information security and thus strengthen our defenses against threats.

The Information Security Committee plays a key role in this strategy (see the Information in [Security Risk Committee section](#)).

Security controls, processes and guidelines are implemented based on several well-known security frameworks, such as ISO 27001, ISO

Our processes are structured so that impact assessment is integrated into decision-making.

27002, NIST and CIS v8 (Critical Security Controls). Each company in the group is responsible for keeping its certifications active, adapting them according to their businesses and sectors, as well as renewing them regularly.

We use an internal framework as a tool to monitor the maturity of the security controls in place over time. Developed based on a variety of international security standards and enriched with risks identified by renowned sources, such as the Open Worldwide Application Security Project (OWASP), the framework allows us to carry out fully detailed periodic monitoring.

Our processes are structured so that impact assessment is integrated into

decision-making. To that end, the IS Committee and internal/external audits meet regularly, as the main goals of the audits is to assess the effectiveness of the policies in place and follow-up on improvements and high-level measures taken.

Successful responses and actions are formalized so that we can use this information as a source of improvement and enhancement of our strategies and possible future training. We also value continuous learning in the face of negative impacts. For example, after significant incidents have been resolved, the root cause of events is identified so that we can understand why they occurred and prevent them from recurring in the future. This allows us to identify specific

flaws in operations, as well as in the security guidelines, practices and policies in place.

We are committed to maintaining a strong and resilient IS culture that is able to face the challenges and threats of the current scenario, while ensuring the protection of our environment. We work together with the group's companies and business partners to mitigate negative impacts. We periodically hold training sessions, workshops and one-off meetings for employees on information security practices. We also run campaigns to increase employee awareness of the issue.

Note 1: Composition referring to 12/31/2023.

Note 2: Such as reducing the number of vulnerabilities detected and acting to mitigate incidents.

Data privacy

Privacy is a fundamental right. Therefore, we work to ensure that the personal data of employees, customers and suppliers are treated with the utmost security and confidentiality and to guarantee the fundamentals of personal data protection, which involve respect for privacy and informational self-determination.

Our operation is in line with regulatory standards. We have a strict **Privacy Policy and Data Processing Contract**, which apply to all the group's companies, customers and main business partners. In the Policy, we detail what types of data are collected, used and shared. We also describe the security measures in place to protect the data, including encryption and physical security.

For suppliers and business partners, we have a mandatory clause in all supply and partnership contracts with provisions on privacy, data protection and confidentiality. Privacy governance includes an agreement on the appropriate protection of personal data.

We only collect the data necessary for the performance of the service and compliance with

legal obligations. Few data are used based on the legitimate interest of the controller or third parties. When data are shared with third-party service providers, they are required to use these data in accordance with LWSA's security measures and practices.

Pursuant to Law 13,709/2018, the Brazilian General Data Protection Law (LGPD, in Portuguese), any user can ask us for information about their personal data collected and request their deletion. The exercise of this right is detailed in our Privacy Policy. We have an exclusive channel for these requests, which should be sent by **email to privacidade@lwsa.tech**.

Training on the LGPD is mandatory for employees of all the group's companies, addressing the objectives of the law, concepts, principles, legal bases, rights of data subjects, role in the management of personal data training, sanctions and good practices. Pursuant to the law, we have a Data Protection Officer (DPO), responsible for dealing with data protection issues. The Chief Legal Officer is responsible for the internal management of the topic.



Training on the LGPD is mandatory for employees of all the group's companies.

Incidents

GRI 418-1

For each project involving a significant amount of personal data classified as “sensitive”, we carry out impact assessments to identify and mitigate the related risks. At the same time, as a preventive measure, there is a process for managing access to systems. Control involves the stages of requesting, authorizing, provisioning, revoking and, above all, periodically reviewing logical access to information systems and resources on our network. This process is carried out using an identity management tool, which centrally manages the granting and revoking of user access.

We also have an exclusive team dedicated to the incident management process, who operates 24/7.

We have advanced threat detection systems that monitor for signs of suspicious activity.

Our internal policy for responding to these events is formalized and is currently being updated. It addresses insider and external threat scenarios and classification based on severity, causes and impacts, as well as response phases that include identification, reporting, analysis, classification, containment, mitigation, recovery, remediation and post-incident activities.

In the event of a data leak, we promptly act to mitigate the impact and damage. This includes, but is not limited to, notifying those affected, the technical operational teams, the

DPO, the Executive Board and the competent authorities. We have also updated all the Security and Privacy documentation in order to avoid future related incidents.

In 2023, we recorded the following incidents: 1 proven complaint of breach of customer privacy; 1 leakage, theft or loss of customer data; no complaint from regulatory agency.





Innovation

We have built a responsible and sustainable innovation environment based on the investments provided by Lei do Bem (Law 11,196/2005). This federal government program allows our companies to benefit from significant tax reductions when they invest in new Research, Development and Innovation (RDI) projects.

Over the years, participation in the program has allowed us to foster a corporate culture of innovation, which also contributes to the professional and technical development of our team, in line with the social aspects of ESG.

Our RDI work aims to meet market needs – for operational efficiency and cost reduction – but also to contribute to a more sustainable economy. This includes solutions that reduce the environmental impact of our operations and those of our customers. Check out some of the technologies and practices developed:

Participation in the program has allowed us to foster a corporate culture of innovation.

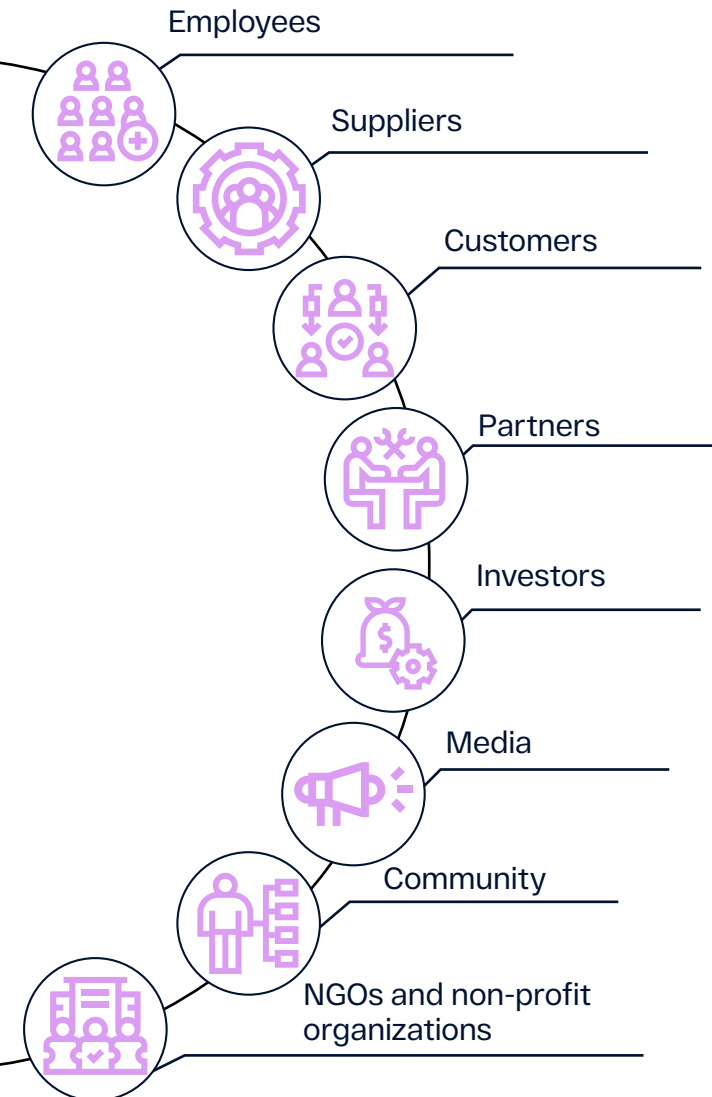
- **Cloud computing:** the use of hosting and cloud computing services, such as those offered by Locaweb, allows companies to reduce the need to maintain large, energy-intensive data centers of their own. Centralization in more efficient data centers can result in a lower carbon footprint.
- **Energy efficiency at data centers:** Locaweb has data centers with infrastructure designed to maximize energy efficiency and reduce energy consumption and, consequently, the associated CO2 emissions.
- **E-commerce and marketplace solutions:** companies under the umbrella of LWSA, 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 LWSA's ecosystem, provides solutions that can optimize delivery logistics, reducing distances traveled and, consequently, greenhouse gas emissions.

RELATIONSHIP WITH STAKEHOLDERS



Stakeholder map

GRI 2-29



The Investor Relations Office is the Company's point of contact with the market and our shareholders. This approach aims to maintain the tradability of our shares at acceptable levels and in line with those of major market players, as well as to gauge shareholders' perceptions of our strategies and internalize their feedback on the direction of the business.

There are three categories of stakeholders with whom we engage:

- **Individual or corporate shareholders:** these are shareholders or potential shareholders who buy our shares in the market aiming at achieving financial returns.
- **Sell-side analysts:** these are institutions that cover our shares and deeply analyze the thesis to produce reports with opinions and projections on the Company's share performance. The focus is on their clients—individuals and institutional investors.

- **Buy-side analysts:** these are investment funds or capital management firms that comprehensively study the stock to achieve significant financial returns for the individuals or companies whose money they manage.

The relationship and dialogue with shareholders begin through the IR website, which hosts all regulatory and complementary information about the Company. We publish our financial results on a quarterly basis. The day after publication, we hold an earnings call where the IR Office explains the period's performance and addresses investor queries.

We periodically host the Investor Day, an event focused on our shareholders, where we can informally discuss the Company's directions. Concurrently, we hold regular meetings, especially with sell-side and buy-side analysts, to ensure they understand the Company's strategies. We frequently participate in events that allow us to engage with multiple buy-side analysts at once to broadly convey our message.

- **Employees:** our interaction is constant and occurs through internal surveys, performance evaluations, metrics, and participation in employee satisfaction surveys such as Great Place to Work (GPTW) and Employee Net Promoter Score (eNPS), in addition to three newsletters – one focusing on internal personnel and processes, and another on business strategy and results. Internal profile on Instagram are also created and managed by the endomarketing team for closer communication.

- **Suppliers and partners:** they receive special attention from our Procurement, Contracts, and Legal teams to ensure clarity in contracted values and services.

- **Customers:** we maintain multiple contact channels, a customer service (SAC, in Portuguese), and tools for handling inquiries. We assess customer satisfaction through the Net Promoter Score (NPS). We encourage all units to participate in the *Reclame Aqui!* certification.

- **Media:** we provide a section for contacting our Public Relations team on our website and maintain frequent communication with media outlets outlined in our strategy.

- **Community and NGOs:** our ESG team manages relationships through email, face-to-face meetings, and support at events.

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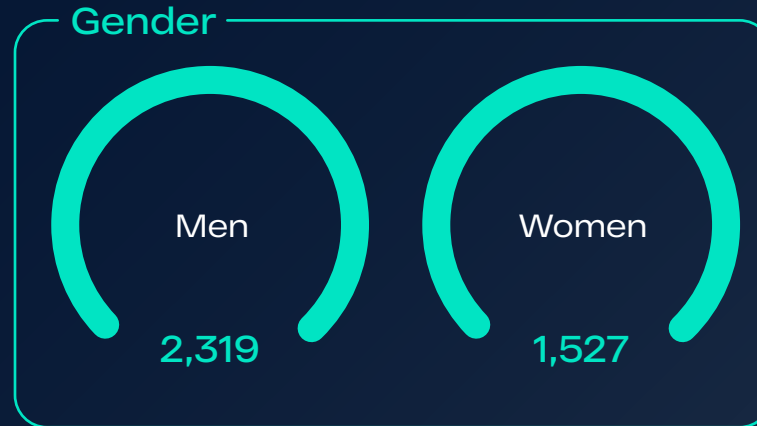
External Assurance



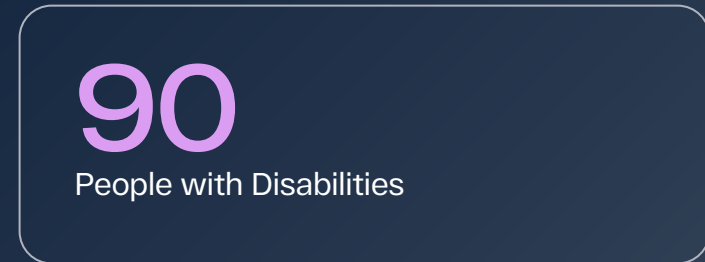
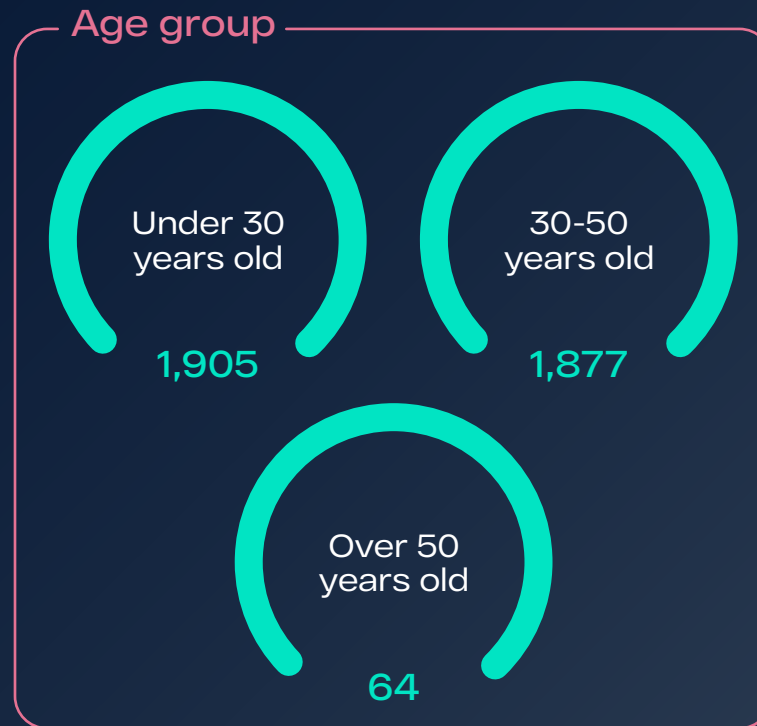
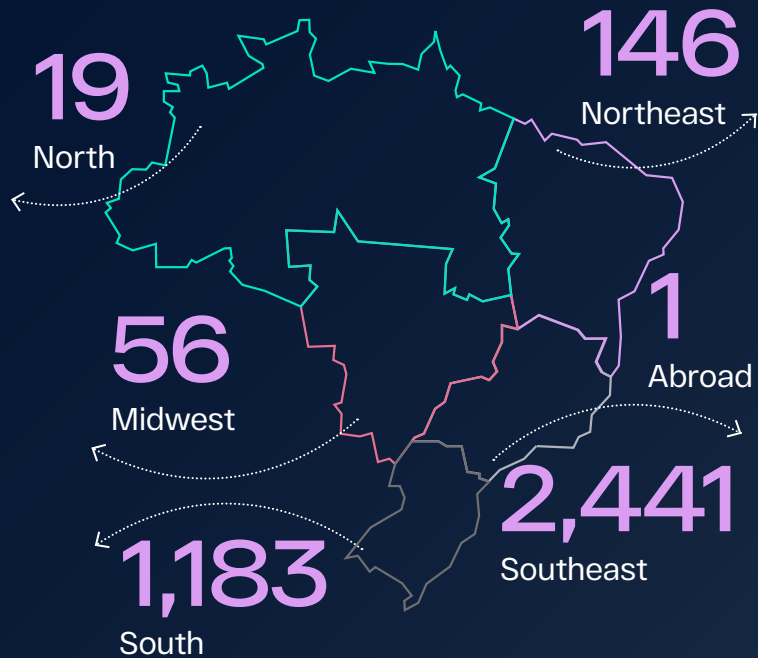
People management

GRI 2-7, 2-8

We have 3,846 employees⁴ operating across various Brazilian regions, in on-site, remote, and hybrid work models. There are 3,813 permanent employees and 33 temporary staff members. Of these, 3,235 work full-time, while 611 work on a flexible schedule without a guaranteed number of fixed hours per day, week, or month, who make themselves available as needed.



Employees by region



Another 23 workers are based at our headquarters under outsourcing contracts and are therefore not considered direct employees. Their responsibilities include cleaning and upkeep, security, and gardening services.

⁴ These data reflect the number of employees under contract on the last day of the year. Employees on leave for social security (INSS, in Portuguese) purposes are not included.

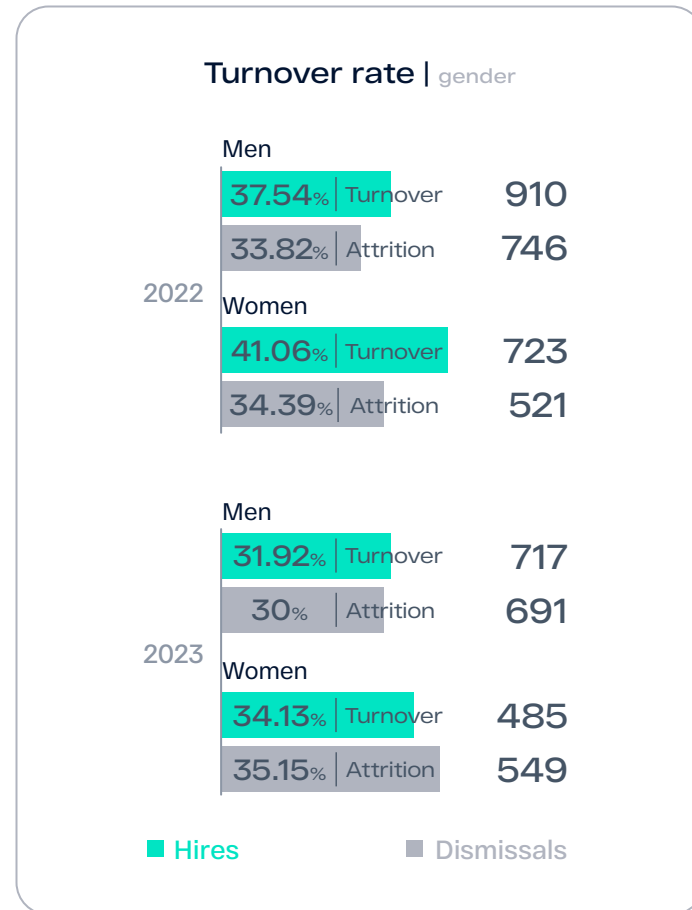
Turnover

Fluctuations in our workforce throughout 2023 were driven by strategic decisions. An example of this was the creation of business verticals and the integration of communications among acquired companies to enhance synergy in services delivery.

However, our turnover rate for the year 2023 was 31.59%, which was lower than the rate recorded in 2022 (38.97%).



Turnover rates between male and female employees were similar in 2023:



To mitigate risks associated with increased turnover and rehiring costs, we implemented talent management policies and practices focused on

employee development and retention. We conducted periodic analyses to identify the primary reasons for employee departures and implemented corrective actions. As a motivating factor, we adopted competitive compensation and attractive benefits, along with recognition programs and professional development opportunities, as detailed in **Professional development**.

We currently have a dev school called Locabuilders, responsible for developer training programs. We developed customized programs to meet the needs of developers and technology leaders, offering five programs in 2023 that addressed the risk of increased turnover and rehiring costs, thereby boosting employee retention within the Company, namely: *Quero Ser DEV*, Locabuilders, Level DEV, Heroes Guide, and Dev Mentoring (**more details in Training**). Before and during the Covid-19 pandemic, there were peaks in hiring programmers in Europe and the United States. With the stabilization of this market movement and in conjunction with said programs, turnover is no longer a challenge for the Company.

Professional development

Material topic: Employee management

We have policies and measures implemented to mitigate risks associated with turnover, loss of intellectual and human capital, and reduced ability to attract talent. We have adopted practices and tools to maintain the development of our employer brand, investing in advanced talent and leader recruitment, development, and retention techniques in line with market demands, the Company's strategic goals, and projected growth.

Regular analysis of future hiring needs is conducted collaboratively across many of the Company's departments. Based on this mapping, we identify necessary technical skills, key behavioral competencies, and values aligned with organizational culture. The job market and recruitment trends are also subject to regularly studies.

Internal recruitment is a priority within the Company. We believe that

this approach encourages our employees' potential while also boosting productivity and efficiency, driving innovation and sustainable growth.

We conduct regular assessments of our talent pipeline, tracking the progress of potential candidates and identifying potential competency gaps and any necessary adjustments to our talent development strategy.

Our recruitment tools include online job platforms, recruitment events, career fairs, professional networking, and employee referral programs (called *Índica Aí*). Additionally, we adopt unconventional approaches to attract talents from diverse backgrounds and experiences, such as partnerships with non-profit organizations supporting underrepresented groups—women, people with disabilities, and ethnic minorities. This approach facilitates access to job opportunities and promotes diversity in the workplace.



Regular analysis of future hiring needs is conducted collaboratively across many of the Company's departments.

Indica Ai

Since 2019, we have implemented the *Indica Ai* program, allowing employees to recommend professionals who align with the Company's values and meet the technical requirements for specific positions or our talent pool. This program has the participation of the back-office of LWSA, Locaweb, and Nextios.

Employees can make referrals from their first day on the job. Eligible referrers include active payroll employees, except for those in the People, Culture, and ESG departments, the requesting manager for the vacancy, managers, interns, service providers, and third parties.

If the referred person is hired and completes the three-month probation period, the referring employee receives a reward for their participation in the Program. They can choose to receive the reward either in their Flash digital wallet or through the *Férias&CO* Program.

The balance in the digital wallet can be checked directly via the app, with deposits made alongside meal vouchers. *Férias&CO* is a benefits platform that connects employees with advantageous travel and leisure opportunities.

We conduct training sessions on the Program, including Q&A sessions. Furthermore, we encourage participation in training on competency-based interviewing and guiding teams in making referrals. Economically, the program delivers positive impacts by cutting costs associated with external recruitment. Socially, it promotes a more inclusive and participative work environment by involving employees in the selection process for new talent. This strengthens a sense of belonging and collaboration within the team, while offering opportunities for recognition and rewards for employees.



Retention

We work on talent retention through Succession and Long-Term Incentive (ILP, in Portuguese) programs, which are implemented Company-wide. The former involves internal mapping of potential successors among employees. Once identified, we can place them in open posi-

tions, facilitating employee migration across business units.

The Succession Program serves as input for ILP, a retention program based on Company shares. From a pool of available, approved shares at the General Meeting, employees

identified in the succession pipeline and highlighted in the 9 Box are selected to receive a specific number of shares, which are vested after three years with the Company. In 2023, 190 employees benefited from this program.

Share allocation occurs annually.

It is important to note that we use technological systems and specialized tools to facilitate, streamline, and ensure security in the practices described above, such as performance assessment, talent mapping, feedback documentation, one-on-one meetings, and Individual Development Plans (IDPs). Online performance management and feedback platforms such as

Qulture.Rocks, are used to document and track employees' progress over time, facilitating trend monitoring and analysis.

By the end of 2023, we implemented a KPI across the entire Company to standardize interview and dismissal processes, identifying areas of talent loss and the reasons for departures.

Concurrently, we are developing a performance management project across the Company to enhance organization and transparency, with competencies more closely aligned with our business. The goal is for performance management to become a valuable tool for impacting rules for salary adjustments and short- and long-term incentives.

Performance evaluation and feedback procedures

Regular performance evaluation and feedback procedures are integrated into our daily operations to contribute to the professional growth and development of our employees.

Performance assessments are typically conducted once a year over a two-week period for all employees, providing a comprehensi-

ve analysis of performance, competencies, and contributions to the Company. Following this cycle, clear and measurable goals aligned with our strategy are set for each employee, forming a solid basis for performance evaluation.

We assess five competencies: agile and innovative attitude, com-



mitment to results, collaboration, systemic vision, and customer engagement and loyalty.

Managers undergo training to conduct evaluations fairly, objectively, and constructively, providing quality feedback and guidance for each employee's individual development.

Feedback procedures are continuous and open to all levels of the Company. They are seamlessly integrated with formal performance evaluations. Regular one-on-one meetings between managers and employees

are held to discuss goal progress, identify areas for improvement, and provide support for professional development. We also encourage peer and team feedback exchange, promoting mutual learning and transparent communication.

Based on performance evaluation and received feedback, Individual Development Plans (IDPs) are created to identify growth and improvement opportunities for each employee. Thus, evaluations, feedback procedures, and IDP design are interconnected.

Internship and trainee programs

To attract and develop early-career talent and invest in the future of our workforce, we offer structured internship and trainee programs that provide hands-on experience within LWSA's daily operations, with ample learning opportunities. To achieve this, we have established partnerships with higher education institutions to ensure the quality and relevance of the programs, collaborating on developing the curriculum, selection of participants, and joint project development.

Once selected, participants work under the supervision of a mentor or advisor who provides personalized support, professional guidance, and ongoing feedback. They also have the opportunity to work on challenging and meaningful projects aligned with our business

needs, applying their theoretical knowledge to tackle real-world issues. This approach ensures effective and targeted development of skills and competencies for students and recent graduates.

Upon completion of the programs, we offer opportunities for permanent employment whenever possible, offering a clear, appealing career path for students and graduates.

Our Internship Program was launched in 2022 and is held twice a year. Since its inception, 59 out of over 9,600 applicants were admitted. Among them, 81% have been retained, and 52.5% have been hired into permanent positions. The percentage of women hired is noteworthy: 83.33% in the first half of 2023 and 45.45% in the second half.

Trainees

In 2023, we conducted the 6th edition of the Trainee Program, hiring 10 professionals who remain active within the Company and are expected to complete their training by December 2024. Over the course of six editions, a total of 60 individuals have been hired. We have recently adopted a model where young trainees are challenged to execute a project. To achieve this, they rotate through three different departments of the Company, gaining a systemic view to execute it effectively. Concurrently, we offer leadership situational and project management training in collaboration with external consultants.

Work environment

We foster a sustainable, inclusive, and attractive work environment for our employees, reflecting our commitment to ESG principles and our pursuit of excellence in corporate social responsibility.

To mitigate the risk of intellectual and human capital loss due to burnout, we invest in wellness and quality-of-life programs at work. The adoption of

remote and hybrid work models by the Company has contributed to this purpose by promoting work-life balance.

There is a culture of feedback and open dialogue that allows employees to express their concerns and suggest improvements for the work environment.

Organizational climate

We are recognized as a great company to work for according to the Great Place to Work and FEEEx Organizational Climate surveys, which monitor employee satisfaction. Our employees acknowledge the atmosphere of respect, comradery, and credibility that prevails within the Company, and they believe they have opportunities for growth and work-life balance.

These surveys not only provide insights into our employees' perceptions of our strengths but also help us identify areas for development and define action plans.

Recognition and reward aspects were highlighted by employees as areas needing improvement. In response, in 2023, we introduced measures such as increased flexibility in benefits and improvements to feedback processes.

87.1

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benchmark



Training

GRI 404-1, 404-2

The current set of training and capacity building programs allows us to say that we operate as a company that functions like a school to train specialized workforce in an environment of shortage of professionals in the technology market, while also enabling diverse individuals to enter this segment, thereby increasing employability. Not surprisingly, graduates and alumni of LWSA are now entrepreneurs in this field.

We offer a wide range of training and professional capacity building programs, including internal training, workshops, external courses, and mentoring programs to support the growth and continuous development of our employees. We also forged partnerships with educational institutions, professional organizations, and other relevant entities to actively cultivate new talent pools. These partnerships include internship programs, joint research projects, and participation in academic and professional events.

We execute several employee development programs, measuring their impact based on participant retention within the Company and their

progression via promotions or internal transfers. Noteworthy programs include:

Quero Ser Dev: the goal is to train individuals in LWSA technologies, strengthen our commitment to diversity, boost careers, provide the community with access to quality training, and disseminate our company culture. In 2023, we hosted the 8th edition with a class of 24 participants, six of whom were hired, with four still actively engaged and one promoted after joining the program.

Over the years, the program engaged over 200 participants, with 75 being hired across different business units, maintaining a retention rate of 34.7%. Training is conducted in an online format. Average attendance rate was 94.8%. Following the hiring of these 75 program graduates, 45 individuals were promoted, including 35 promotions and 10 merit-based salary increases within their respective salary ranges. The program included two notable editions: the 6th edition for women, with 963 applicants, and the 8th edition for individuals over 40 years old, with 1,754 applicants.

Level Dev: focused on the technical and behavioral development of junior and mid-level software developers to prepare them for the next stages of their careers. The program prepares professionals to independently solve technology challenges in LWSA's business units on a day-to-day basis. In 2023, we hosted the 4th edition, training 23 developers. Over the course of the four editions, the program has trained 81 employees and maintains an 81.5% retention rate.

Heroes Guide: aimed at boosting the careers of developers in the Locaweb's Product Engineering team. The goal is to empower employees to take charge of their own career through an autonomous, dynamic, and achievable process. It includes seven career levels, from Analyst I to Technical Leader II. It is conducted in continuous cycles, each lasting an average of 12 weeks. The first cycle took place in 2021, and by the end of 2023, ten cycles had been completed.

Locabuilders: a career acceleration program for developers implemented in 2023. We hired five junior-level software developers to study for two months at the Locabuilders School, attending daily live classes and following a curriculum collaboratively developed by technology instructors, tech leads, Locabuilders course instructors, and senior developers, all invited to identify key pain points in dev training, along with key content to be covered in the course. The result was the renewal of contracts for all five junior developers, with promotion to mid-level roles.

Progr.Amar: aimed at developing and integrating People with Disabilities into on-site activities, enhancing technical and behavioral competencies through a personalized track. In 2023, seven employees completed the program with a 98% attendance rate. Learning progress was measured in blocks: 3.2 in math, 2.98 in reading, and 2.1 in writing (one block equals one academic bimester). All program graduates remain active.

Alongside training and capacity building, we offer the Education Incentive to enhance employees' skills. This initiative provides financial support for undergraduate and specialization courses at educational institutions. In 2023, we awarded 10 incentives and renewed six others that were granted in 2022.



Leadership development

The leadership training and development model has evolved in recent years, focusing on learning from experiences and improving processes. We have conducted online training sessions using recordings, with an officer acting as a sponsor.

In 2023, we decided to bring together coordinators, managers, and officers from all business units for joint training sessions. Through masterclasses and practical workshops, the Leaders Program provided a comprehensive understanding of the business. Topics covered included: Our DNA (leader's self-awareness); Our Way (LWSA culture); Our

Business (challenges and opportunities); and Our Teams (high-performance teams).

Coordinators also received an asynchronous development track covering themes from hiring to termination, feedback to influence, and delegation to development.

In 2023, we also implemented a specific leadership onboarding, addressing both operational and more subjective business issues.

For 2024, the training model has been restructured according to each business unit's specific needs.

We executed specific leadership development programs such as:

- **Leaders Program:** aimed at developing and improving the skills required for effective and strategic leadership, not just strengthening individual leadership skills. In 2023, there were 20 hours of training, with four online meetings (with an average 54% attendance) and four in-person meetings (with 49% attendance).
- **Make New Leaders:** employees identified in the Succession Program are trained and equipped to be prepared for management and leadership challenges. Senior-level professionals identified as talents and ready to take on the position immediately or within one to two years can participate. Training covers topics such as leadership mindset and accountability.
- **Leaders Onboarding:** In 2023, we developed an onboarding track for new leaders and those promoted to coordinator roles to accelerate their learning curve and performance. The program was implemented in 2024. Currently, there are no retention or satisfaction data for leaders or feedback on satisfaction with the onboarding process. We have developed tutorials and manuals on HR and security systems, as well as explanations of HR processes to help leaders resolve operational queries. Additionally, there are live meetings during the first 90 days of promotion to help leaders broaden their systemic understanding of business operations and team performance and development.

Training duration

GRI 404-1

In 2023, we opted for more focused training sessions, targeting specific audiences and with shorter durations. In 2023, we conducted 187 training sessions, with an average of 28 participants per class and an average duration of 4.91 hours. In the previous year, there were 175 training sessions, with an average

of 34 participants per session and an average duration of 9.60 hours.

An analysis based on gender shows a convergence in average training hours between women and men, underscoring our commitment to ensuring equal development opportunities.

Regarding training by position, there was an increase in average training hours in many departments. More focused training sessions may have been more appealing, as they managed to keep employees engaged for longer periods in the classroom.

Average hours of training per employee, by employment category

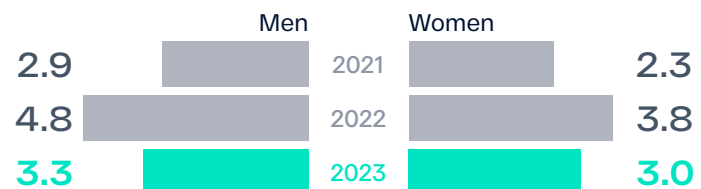
Employment category	2023	
	Total hours	Average hours
Vice-Presidents	35.0	2.9
Executive Officers	971.2	3.0
Managers	204.0	2.0
Supervisors	84.5	3.4
Coordinators	363.0	3.4
Technical leaders	1,089.0	2.5
Specialists	38.5	3.2
Analysts I	3,869.5	3.3
Analysts II	1,760.0	3.9
Analysts III	692.5	3.6
Assistants	241.0	3.3
Aides	31.0	2.8
Interns	308.0	2.7
Total training hours	9,687.2	

Note: Data were defined for corporate programs and actions (e.g., internship program, trainee program, leadership program, etc.), as well as for actions focused on LWSA units - Backoffice, Locaweb and Nextios. One-off initiatives from other units were not included in these data. Moreover, the calculation considered total sum of training hours/total sum of training participations.

Total training hours



Training hours on average



Partnerships with educational institutions

Our investment in continuous development and training for our team involves productive partnerships with educational institutions to drive innovation, knowledge, sustainable growth, and provide employees access to external perspectives and knowledge. We collaborate with consulting firms and educational institutions to develop joint training programs tailored to the Company's specific needs and employee interests.

These programs include in-person courses, workshops, seminars, webinars, and other learning activities. They cover technical and technological skills as well as behavioral and leadership competencies. We leverage the resources and expertise of our partners, enhancing the quality and diversity of our training programs.

Through these partnerships, we also contribute to co-creating training content and curricula, ensuring they meet job market demands and align with industry best practices. We believe that our active involvement in these co-creations directly influences the provision of continuous learning and development of relevant skills and competencies to our employees.

All these synergies strengthen our relationship with the academic community, creating opportunities for research projects, internships, trainee programs, and corporate social responsibility activities that benefit the Company, employees, academic community, and society.

Currently, we have over 20 active partnerships with educational institutions offering discounts to our



employees on language courses, undergraduate, postgraduate, and MBA programs.

In 2023, we continued with the REP Project (Effective Problem Resolution, in the Portuguese acronym),

a partnership with Insper, a higher education institution, initiated in 2022, where a group of students work on a real Company case to propose solutions using the PDCA methodology (Plan, Do, Check, Act) to improve process management.

Benefits and Profit-Sharing Plan

GRI 2-30, 401-2

We offer the following benefits to full-time employees⁵:

- SulAmérica healthcare plan;
- SulAmérica dental care plan;
- Pet health plan;
- Flash meal voucher;
- Group life insurance;
- Extended maternity leave;
- Transportation allowance or free parking;
- Free shuttle service from the terminal to subway station;
- Childcare assistance for dependents up to 5 years old;
- Home office allowance;
- Wellhub.

Related Global Compact Principles

⁵ These benefits are not available to temporary or part-time workers.

We also have a Profit-Sharing Plan (PPR, in Portuguese), approved by trade unions. There are minimum conditions for payment related to financial indicators of both the Company and the unit where the employee is allocated. Each career level has a base salary multiple used to calculate the PPR.



Collective bargaining agreements

The vast majority of the Company's employees (97%) are covered by a Collective Bargaining Agreement.

Statutory directors account for 3% of active employees and are not covered by the Agreement. Their salary are adjusted every 12 months, in the month of the base date established by the Collective Bargaining Agreement of the unions with which the group's companies interact, and are generally tied to the Brazilian Extended National Consumer Price Index (IPCA, in Portuguese).



Compensation and Equal Pay

In 2023, we set a goal of achieving pay equality within the Company. We began identifying positions that most influence salary differences and strategies to align discrepancies, considering variables such as gender, race, length of service, and performance, in accordance with the newly published Law 14,611/2023, which addresses salary equality and compensation criteria between women and men.

In a preliminary diagnosis conducted in 2023, we considered the scenario of managers (officers, managers, coordinators, and technical leaders) at 13 units with more than 100 employees. Our goal is to detail and understand the differences in salaries related to gender and race, isolating factors such as seniority and performance, at all hierarchical levels and units of the Company.

For the next steps, we have the following plan:

- Diagnosis/analysis;
- Development of proposals and planning;
- Implementation and development of the Equal Pay Law action plan;
- Monitoring progress.



Inclusion and Diversity

GRI 2-7, 2-8, 405-1 | 3-3 Material Topic: Inclusion and diversity within the organization

Inclusion and Diversity (I&D) are core principles guiding our business. Five years ago, we formally committed to incorporating this theme into our Code of Ethics. Since then, we have implemented structural transformations in recruitment and talent management through affirmative actions to enhance representation within our team and foster equity in our workplace. Training sessions, educational initiatives, and internal and external campaigns involving

employees and leaders complement our efforts.

I&D is also integral to our Social and Environmental Responsibility Policy, published in 2022, applicable to all business units. This document reinforces our support for diversity in gender, ethnicity, beliefs, political views, nationality, social background, sexual orientation, as well as for people with disabilities and different age groups. We prohibit any discriminatory beha-

avior, from the hiring process to the end of employment, including through termination, dismissal, or retirement.

One measure adopted in 2023 was to include all managers in the Promotion Evaluation Committee to make the succession pipeline more effective and eliminate biases. Previously, it consisted only of the executive board and a few key individuals. This measure seeks to broaden perspectives on who should as-

sume leadership roles and reduce perceptions of favoritism.

In 2023, we revamped our training program focused on inclusion and diversity. Topics covered included unconscious biases, fostering an inclusive team environment, understanding our role in the matter, and a thorough training on the ethical standards outlined in our Code of Ethics. We also provided training in areas such as psychological safety and non-violent communication for

our leaders, representatives, ambassadors – employees who support the actions of the Inclusion and Diversity Committee – and affinity group allies.

Since 2019, we have conducted an Inclusion & Diversity census to monitor the effectiveness of our initiatives. We have observed significant progress since then, driven by affirmative actions put into practice. Highlights include pillars focused on women and LGBTQIAPN+ individuals.

Between 2022 and 2023, female representation in our workforce increased by 0.7 p.p.; and 3.2 p.p. of leadership positions are held by women, reaching 39.1% of the total workforce, according to HR’s active employee base.

We have been recognized in the TEVA Women in Leadership Index and by the GPTW Institute in the Women category (diversity ranking).

In the 2023 Census, 20% of respondents self-reported as LGBTQIAPN+.

We firmly believe that diverse and multidisciplinary teams enhance our performance, which is why investing in human capital is a priority for us.

Percentage of employees per employment category, by gender

Employment category	Gender	2023	
		Total	%
Vice-Presidents	Men	5	100.0%
	Women	0	0.0%
Executive Officers	Men	43	84.3%
	Women	8	15.7%
Managers	Men	150	68.2%
	Women	70	31.8%
Technical leaders	Men	43	86.0%
	Women	7	14.0%
Coordinators	Men	160	55.7%
	Women	127	44.3%
Specialists	Men	159	76.8%
	Women	48	23.2%
Supervisors	Men	16	41.0%
	Women	23	59.0%
Analysts III	Men	282	70.9%
	Women	116	29.1%
Analysts II	Men	565	61.9%
	Women	348	38.1%
Analysts I	Men	696	58.0%
	Women	503	42.0%



Percentage of employees per employment category, by gender

Employment category	Gender	2023	
		Total	%
Assistants	Men	84	38.0%
	Women	137	62.0%
Aides	Men	45	40.2%
	Women	67	59.8%
Interns	Men	38	48.7%
	Women	40	51.3%
Apprentices	Men	26	45.6%
	Women	31	54.4%
Total	Men	2,312	60.3%
	Women	1,525	39.7%
	Overall total	3,837	100.0%

Note: Does not include members of the Board of Directors and the CEO

Percentage of employees per employment category, by age group

Employment category	Age group	2023	
		Total	%
Vice-Presidents	Under 30 years old	0	0.0%
	30-50 years old	4	80.0%
	Over 50 years old	1	20.0%
Executive Officers	Under 30 years old	0	0.0%
	30-50 years old	43	84.3%
	Over 50 years old	8	15.7%
Managers	Under 30 years old	21	9.5%
	30-50 years old	188	85.5%
	Over 50 years old	11	5.0%
Technical leaders	Under 30 years old	8	16.0%
	30-50 years old	42	84.0%
	Over 50 years old	0	0.0%
Coordinators	Under 30 years old	69	24.0%
	30-50 years old	213	74.2%
	Over 50 years old	5	1.7%
Specialists	Under 30 years old	50	24.2%
	30-50 years old	153	73.9%
	Over 50 years old	4	1.9%
Supervisors	Under 30 years old	17	43.6%
	30-50 years old	22	56.4%
	Over 50 years old	0	0.0%
Analysts III	Under 30 years old	141	35.4%
	30-50 years old	254	63.8%
	Over 50 years old	3	0.8%

Percentage of employees per employment category, by age group

Employment category	Age group	2023	
		Total	%
Analysts II	Under 30 years old	497	54.4%
	30-50 years old	412	45.1%
	Over 50 years old	4	0.4%
Analysts I	Under 30 years old	761	63.5%
	30-50 years old	426	35.5%
	Over 50 years old	12	1.0%
Assistants	Under 30 years old	146	66.1%
	30-50 years old	73	33.0%
	Over 50 years old	2	0.9%
Aides	Under 30 years old	68	60.7%
	30-50 years old	36	32.1%
	Over 50 years old	8	7.1%
Interns	Under 30 years old	70	89.7%
	30-50 years old	8	10.3%
	Over 50 years old	0	0.0%
Apprentices	Under 30 years old	57	100.0%
	30-50 years old	0	0.0%
	Over 50 years old	0	0.0%
Total	Under 30 years old	1,905	49.6%
	30-50 years old	1,874	48.8%
	Over 50 years old	58	1.5%
	Overall total	3,837	100.0%

Note: Does not include members of the Board of Directors and the CEO.

We increased Black representation in our workforce by 1.4 p.p., according to the latest census. We were recognized by the GPTW Institute in the Ethnic-Racial category (diversity ranking).

Employee percentage per employment category, color and/or race

Employee category	Color or race	2023	
		Total	%
Vice-Presidents	Black	0	0.0%
	Brown	0	0.0%
	White	5	100.0%
	Indigenous people	0	0.0%
	Yellow	0	0.0%
Executive Officers	Black	0	0.0%
	Brown	3	5.9%
	White	43	84.3%
	Indigenous people	0	0.0%
Managers	Yellow	5	9.8%
	Black	10	4.5%
	Brown	25	11.4%
	White	180	81.8%
Technical leaders	Indigenous people	0	0.0%
	Yellow	5	2.3%
	Black	3	6.0%
	Brown	10	20.0%
Coordinators	White	34	68.0%
	Indigenous people	0	0.0%
	Yellow	3	6.0%
	Black	9	3.1%
	Brown	39	13.6%
	White	234	81.5%
	Indigenous people	0	0.0%
	Yellow	5	1.7%

Employee percentage per employment category, color and/or race

Employee category	Color or race	2023	
		Total	%
Specialists	Black	8	3.9%
	Brown	40	19.3%
	White	156	75.4%
	Indigenous people	0	0.0%
	Yellow	3	1.4%
Supervisors	Black	1	2.6%
	Brown	3	7.7%
	White	35	89.7%
	Indigenous people	0	0.0%
	Yellow	0	0.0%
Analysts III	Black	25	6.3%
	Brown	90	22.6%
	White	276	69.3%
	Indigenous people	2	0.5%
	Yellow	5	1.3%
Analysts II	Black	90	9.9%
	Brown	177	19.4%
	White	634	69.4%
	Indigenous people	4	0.4%
	Yellow	8	0.9%
Analysts I	Black	92	7.7%
	Brown	260	21.7%
	White	827	69.0%
	Indigenous people	2	0.2%
	Yellow	18	1.5%

Employee percentage per employment category, color and/or race

Employee category	Color or race	2023	
		Total	%
Assistants	Black	31	14.0%
	Brown	63	28.5%
	White	125	56.6%
	Indigenous people	1	0.5%
	Yellow	1	0.5%
Aides	Black	18	16.1%
	Brown	29	25.9%
	White	65	58.0%
	Indigenous people	0	0.0%
	Yellow	0	0.0%
Interns	Black	7	9.0%
	Brown	11	14.1%
	White	60	76.9%
	Indigenous people	0	0.0%
	Yellow	0	0.0%
Aprendiz	Black	9	15.8%
	Brown	9	15.8%
	White	39	68.4%
	Indigenous people	0	0.0%
	Yellow	0	0.0%
Total	Black	303	7.9%
	Brown	759	19.8%
	White	2,713	70.7%
	Indigenous people	9	0.2%
	Yellow	53	1.4%
	Overall total	3,837	100.0%

Note: Does not include members of the Board of Directors and the CEO.

Our current challenge lies in hiring more people with disabilities. We have been outlining strategies to address this issue within the Company. In 2023, we had 90 People with disabilities in our workforce, marking an increase compared to 78 in 2022.

Programar: We launched a project in the second half of 2023 to enable intellectually disabled individuals to return to in-person work post-pandemic. The approach is tailored to enhance technical and behavioral skills through collaboration from HR teams, management, and even family members.

Percentage of employees per employment category, per people with disabilities

Employment category	2023	
	Total	%
Vice-Presidents	0	0.0%
Executive Officers	0	0.0%
Managers	2	0.9%
Technical leaders	1	2.0%
Coordinators	2	0.7%
Specialists	1	0.5%
Supervisors	0	0.0%
Analysts III	3	0.8%
Analysts II	14	1.5%
Analysts I	42	3.5%
Assistants	12	5.4%
Aides	12	10.7%
Interns	0	0.0%
Apprentices	1	1.8%
Total	90	2.3%

Note: Does not include members of the Board of Directors and the CEO.



Inclusion and Diversity Committee

We operate across seven fronts: women; LGBT+; People with Disabilities; generational diversity; cultural and ethnic diversity; body positivity; and masculinities.

Established five years ago, the Inclusion and Diversity Committee fosters discussions on the topic, monitors metric progress, and continuously reviews our internal processes. We operate across seven fronts: women; LGBT+; People with Disabilities; generational diversity; cultural and ethnic diversity; body positivity; and masculinities.

In 2023, it transitioned into a corporate volunteer program to enhance governance and visibility of our initiatives. As part of our restructuring strategy, we adopted a refined volunteer selection process, six-month program cycles, and high-impact deliveries to demonstrate tangible results, alongside mandatory training and commitments.

Our goal is to enhance external visibility of participant involvement and our I&D initiatives.

We believe that with these structured and committed approaches, we will be able to reduce volunteer turnover and increase initiative continuity, significantly enhance internal and external program visibility, and foster a more inclusive and diverse environment that boosts employee engagement and well-being.

Professionals from any business unit can serve as volunteers. They receive the same training track and act as focal points for information dissemination. They conduct discussions and awareness sessions via our internal channels (newsletter and Instagram).

Monthly, we host 'Meet the Committee' sessions, an opportunity to share the group's history, organization, current activities and campaigns, and insights from our census data compared to market trends. This agenda aims to impact new employees or those who have not yet engaged with the Committee.



Health and Safety

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

Our headquarters features a medical clinic staffed with nursing technicians ready to assist in emergencies. We also have a contract with a 24-hour ambulance service (called Dez Emergência). Employees are informed about the location and hours of operation of the clinic, as well as how to contact them in case of medical emergencies during weekends and holidays.

Based on the 408 outpatient visits in 2023, we identified high blood pressure and discomfort as the main health issues faced by employees, allowing us to

plan health and safety initiatives for 2024. We will organize lectures on high blood pressure, depression, and anxiety. Mental health and substance use were addressed through employee lectures in 2023.

In terms of workplace safety, our system adheres to recognized guidelines. It covers the entire headquarters building and especially those employees working in high-risk environments. All employees are protected by Regulatory Standard (NR, in Portuguese) 1 from the Ministry of Labor, allowing them to cease work if they identify a serious and imminent risk to their life or health

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The following NRs, applicable only to our Company's employees, have been implemented:

- **NR 10** – Electrical installations and services safety: Applies to the data center team responsible for maintaining the entire electrical network and generators of the Company.
- **NR 12** – Machinery and equipment workplace safety: Applies to the hardware team using hydraulic presses to destroy unused hard drives.
- **NR 23** – Fire protection: Applies to fire brigade and occupational hygiene personnel, aiming to preserve worker's health and integrity by anticipating, recognizing, assessing, and controlling existing or potential environmental risks in the workplace.

All employees undergo training according to the specific needs of their departments. Additionally, each year we hold the Internal Accident Prevention Week (Sipat, in Portuguese), which includes integrative initiatives covering various health and safety topics.

Employees can report any hazardous situation to the Internal Commission for Accident and Harassment Prevention (Cipa, in Portuguese) and the occupational safety technician. Monthly Cipa meetings are held to discuss health and safety issues.

The Commission's president convenes and leads meetings, keeps the Specialized Safety Engineering and Occupational Medicine Service (SESMT, in Portuguese) informed, and delegates responsibilities to the vice president.

In 2023, no work-related accidents or incidents occurred. However, in the event of an incident, the occupational safety technician contacts the victim or witnesses. An accident investigation report is completed and forwarded to HR for further action.



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Customer Relationship



Customer profile

GRI 2-6

In 2023, 703,462 active customers used our solutions ecosystem. They are primarily small and medium-sized businesses operating across various sectors of the economy. These customers benefit from our services across one or more business fronts, as shown in the following table.

Vertical	Main segments
Commerce enterprise	<ul style="list-style-type: none"> ■ Apparel and shoes; ■ Home and decor; ■ Electronics and home appliances.
SMB logistics commerce	<ul style="list-style-type: none"> ■ Apparel and accessories; ■ Home and decor; ■ Beauty and health; ■ IT; ■ Cars and accessories.
BeOnline and SAAS	<ul style="list-style-type: none"> ■ Entrepreneurs and small and medium-sized businesses that use our products and services to develop their activities and businesses on the Internet; ■ Developers, digital agencies, resellers and web designers that use our platforms to sell our solutions and provide services to their clients; ■ Corporate customers with a focus on cloud computing, big data, artificial intelligence, among other advanced technology solutions that we offer.
ERP / management	<ul style="list-style-type: none"> ■ Apparel and accessories; ■ Food & beverage; ■ Furniture, home and decor; ■ Electronics.
Financial services	<ul style="list-style-type: none"> ■ Gyms and fitness; ■ Education; ■ Beauty and cosmetics; ■ Health; ■ Subscription clubs; ■ Insurance companies; ■ Retail.

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Locaweb Journey: Onboarding and e-learning

Our operation is structured to provide a tech-touch and self-service journey for customers, from service acquisition to support. This model is supported by user characteristics and profitability.

Service acquisition follows standardized procedures. Onboarding varies based on the contracted service and includes step-by-step guidance to address service-related inquiries. We have been focusing on digital transformation at this stage, automating product and service configurations to further enhance customer experience.

The Company prioritizes digital inclusion, which also encompasses our customers. We provide round-the-clock support, 24/7, to assist users facing difficulties accessing their accounts or payment methods.

In 2023, we expanded our e-learning initiative by creating content – both written and video – aimed at guiding customers based on their specific information needs, using relevant keywords. Thus, our relationship with users begins not only from their need for a specific product or service but also from their demand for assistance and education.

Customer service channels

Our customer service is available through four channels: phone, chat, WhatsApp, and tickets. We monitor real-time volume and conduct qualitative analysis of the content handled by our analysts. This evaluation is performed by coordinators, quality and training teams, and also involves the review of interactions by Generative Artificial Intelligence (GenAI).

Our “N1” team handles incoming requests. If a solution is not immediately available, our “N2” team steps in. “N1” analysts are IT-trained and undergo internal training, from initial onboarding to continuous skill development and refresher courses.

We assess the effectiveness of our service channels using KPIs that combine internal insights with customer satisfaction surveys. Customer feedback is measured across three pillars: solution (assessing the provided solution), speed (evaluating wait times), and relationship (assessing the professionalism of service agents). Our primary methodology for fostering continuous improvement is the PDCA cycle (Plan, Do, Check, Act).

To gauge customer service efficiency, we use the *Reclame Aqui!* (RA) platform. Our key operations hold the RA1000 seal, awarded to companies with outstanding customer service ratings on the platform.

We provide 24/7 support for users with difficulties accessing their accounts or payment methods.

Supply chain

In 2023, we engaged 3,848 suppliers for technology-related services, transportation, hardware and software sales, specialized technology workforce, payment services, electricity supply, technology equipment supply, digital platforms and search engines, telecommunications, internet services, and digital cloud services.

Key supplier categories include: carriers (land, air, postal, courier), digital search engines (Google), digital platforms (marketing, CRM, search, and research), hosting services (Amazon and others), hardware and software resellers, healthcare service providers, social media platforms, computer/server/peripheral manufacturers, online domain registration entities, digital certifiers, national and international software companies, digital cloud

services, general consulting and advisory firms, electricity suppliers in the free market and utilities, payment service providers (employee benefits – Wellhub, Flash, Caju), legal services, facilities and utilities, travel agencies and platforms, audit firms, telecommunications, internet links, physical and online security services, vehicle rentals, training, HR and payroll services, events, banks, taxi and mobility apps, general insurance agencies, and marketing agencies.

Our relationships with suppliers are typically long-term. We also collaborate with strategic partners with whom we share similar goals and values due to the nature of services, providing mutual benefits and growth opportunities. Together, we offer products and services to end consumers.



In 2023, we engaged 3,848 suppliers for technology-related services, transportation, digital platforms and search engines.

Relationship with the Communities

As a company in the sector, we believe in the potential of technology for social and economic development. In an increasingly digital and interconnected world, making technological tools accessible to everyone, regardless of origin or age, is imperative and part of our commitment to reducing inequalities.

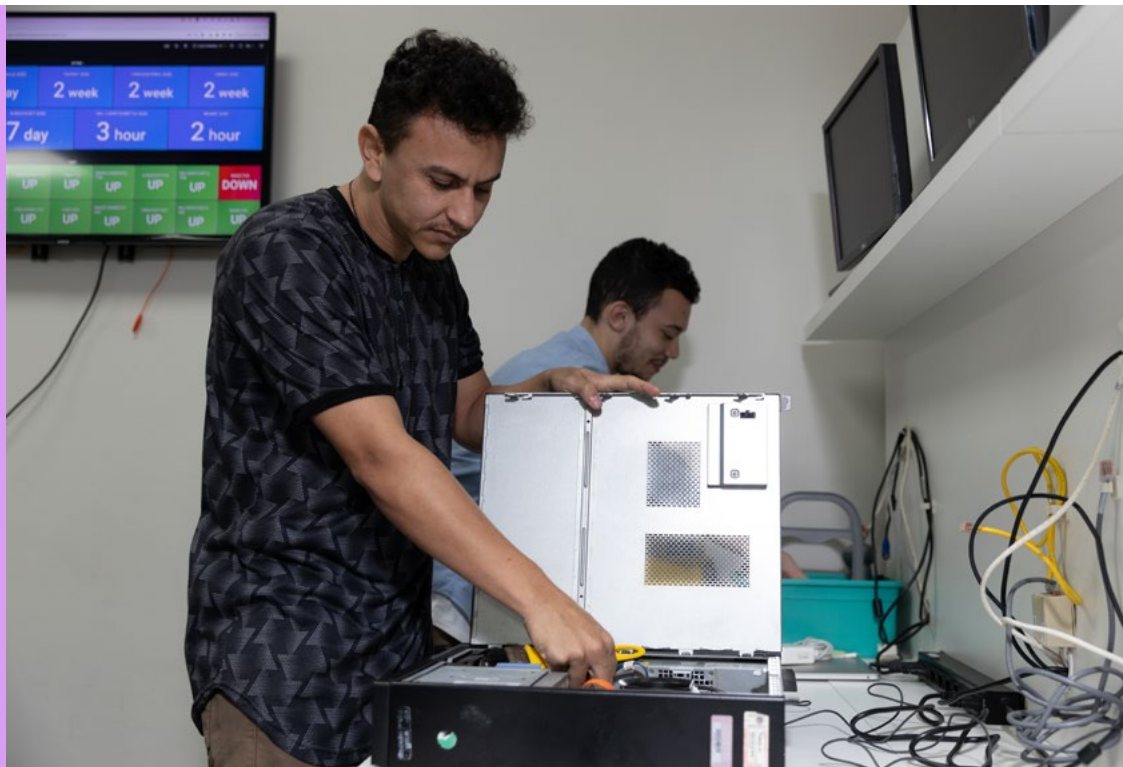
Within our sphere of influence, we have been investing in initiatives that combine technology with promoting entrepreneurship, facilitating entry into the job market, and fostering professional development, affecting not only individuals but also families and communities.

Promoting entrepreneurship

GRI 3-3 Material topic: Promotion of entrepreneurship in local communities

- **Internet professionals:** It is a platform aimed at connecting technology professionals with small and medium-sized enterprises (PME, in Portuguese) that require support with internet services for their businesses. This way, we can provide an additional customer acquisition channel for advanced-level partners and ensure that PMEs' demands can be met by quality professionals backed by LWSA's credibility.
- **E-commerce School:** It provides a portal of free content for PMEs with over two thousand articles and 500,000 monthly accesses. As customers progress in their discovery and learning journey, we begin to introduce Tray and its entire ecosystem, strengthening our sales intelligence. [See more.](#)

We believe in the potential of technology for social and economic development. We have invested in actions that combine technology with the promotion of entrepreneurship, insertion in the job market and professional development.



■ **Exclusive courses for customers:**

We have combined our practical courses platform, E-Tray, with our strategic courses platform, E-comClass, to provide customers with the knowledge they need to succeed.

■ **KingHost Connection:**

It is a free online event designed for entrepreneurs and freelancers to enhance their online presence. In 2023, we conducted classes and a workshop with experts focused on business digitalization and entrepreneurial vision.

Since 2020, we have been running the Diversa project at KingHost, of-

fering IT training to marginalized groups. Over 1,200 individuals have benefited from sessions tailored for audiences including those aged 50+, LGBTQIAPN+, Black individuals, women, and those in social vulnerability. The next edition will focus on women, featuring pre-recorded classes available through a fully online, free-of-charge platform with certification upon completion.

Our goal is to contribute to reducing disparities through an inclusive educational experience, fostering not only technical development but also building a supportive network that promotes equitable and diversified professional paths.

Educational materials released in 2023

- Updated “Website Creator Course: learn to build a website yourself”;
- Checklist for a successful digital campaign: conteudo.king.host/checklist-campanha-digital;
- Kit with Income Statement spreadsheet and Financial Management e-book: conteudo.king.host/planilha-dedre-kit-financeiro-pme;
- Strategic business plan toolkit: conteudo.king.host/plano-e-strategico-de-negocios-kitferramentas;
- Checklist for your digital project to succeed: conteudo.king.host/como-empreender-nodigital-checklist.

Digital inclusion

GRI 3-3 Material topic: Digital inclusion

We believe that technology is for everyone. Based on this premise, we promote digital inclusion initiatives aimed at developing employees, assisting customers, and educating and enhancing the employability of youth.

In 2023, we launched the first edition of the social project *Conectaê*, targeting young people aged 15 to 17 under the care of the Institutional

Reception Service for Children and Adolescents (Saica, in Portuguese). The program focuses on enhancing the employability of these youths through classes covering both soft and hard skills in the technology sector. Twenty-four participants were involved, with 20 successfully completing the program – 80% of whom were women. Nearly 700 classes were completed. At the conclusion, four students were placed into the

workforce, including two who were hired by LWSA as youth apprentices.

To support the learning structure, we donated 21 notebooks to Saica and provided internship allowances to the participants. In addition to the training, we conducted a corporate volunteer program providing career mentoring to the youth. We oversee the selection process, admission to the virtual learning environment, monitoring class teachers, and based on student performance evaluation. Throughout the course, we engaged in employability dynamics by promoting job openings for junior developers, bringing in technology

managers to discuss career opportunities, and assessing potential hires among students. The course is conducted by a specialized technology education company that also develops extracurricular activities and monitors student performance.

The *Quero Ser Dev* program also serves the purpose of digital inclusion. It is a robust Ruby on Rails and TypeScript programming course for beginners, offered free of charge with open enrollment. This is an introductory training designed to empower participants for a new profession regardless of prior knowledge. The program aims to train participants for a new profession. Standout participants are hired for our junior developer positions. In 2023, *Quero Ser Dev* specifically welcomed individuals over 40 years old, recognizing their potential challenges in re-entering the job market due to age, especially within the technology sector.



The 1st edition of the *Conectaê* social project focused on the employability of young people, with soft and hard skills classes.

Social responsibility

In 2023, we launched the Guidelines and Premises for Private Social Investment (ISP, in Portuguese) to better direct our investments. Following the publication of this document, incentives are now directed towards projects in line with the Company's 2030 goals, integrating our business model with our purposes.

The People, Culture, and ESG Executive Office evaluates actions and projects eligible for investment, either through sponsorship or the provision of Company products to assist individuals with their business and goals.



Our premises include

	SDG
Quality education for all	
Reducing social inequalities	
Promoting entrepreneurship	
Digital inclusion: technology is for everyone	

These **material topics** form the foundation of our premises along with the following prioritized SDGs:



Our headquarters is based next to the Peinha community in southern São Paulo. We maintain a strong relationship with community leaders, holding regular meetings and supporting local initiatives such as donations of basic food baskets, toys, as well as sponsoring the local soccer team and martial arts group involving children and adults from the region.

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ENVIRONMENTAL MANAGEMENT



Energy

GRI 302-1, 302-4 | 3-3 Material topic: Energy management, Integration of sustainability considerations for data center needs

As a technology company, our greatest environmental impact lies in the high consumption of electricity, especially due to the use of and need for constant cooling of our own data center. Currently, 35.21% of our emissions come from the consumption and generation of electricity. Over the last four years, we have reduced our energy consumption without harming our business. The measures adopted by LWSA include the purchase of electricity on the Free Energy Market and the replacement of old equipment with new equipment, with greater capacity and lower energy consumption.

In 2023, we replaced old servers and storage with more modern equipment with greater processing and storage capacity. In certain situations, one new piece of equipment has replaced ten old ones. We have also decommissioned servers without manufacturer's warranty and support, migrating solutions to virtualized environments. We saved R\$ 97,511.04 with this replacement.

Currently, the focus of data center management is to maintain the excellence of existing processes. We adopt good maintenance practices for infrastructure equipment to ensure that it is wi-

thin its useful life. Preventive maintenance reports are subject to internal audits on a monthly basis. An external on-site audit is carried out annually as part of the ISAE 3402 certification process (EY audit).

We have diesel-powered electric generators, which provide a redundant source in the event of a failure in the main power supply. This ensures that the data center can continue to operate even during extended power outages. IT and data center operations managers are responsible for ensuring that generators are regularly tested, properly maintained and ready for use should the need arise.

In 2023, energy purchased to supply the headquarters and data center came from

100% renewable sources.



Since September 2016, we have also been buying electricity on the Free Energy Market. In 2023, we started buying incentivized energy (energy from renewable sources), having signed a contract to buy in-

centivized energy for the following years until 2027.

In 2023, all the energy purchased to supply the headquarters and data center came from renewable sources.

Cost reduction

The main benefit of joining the Free Energy Market is reducing costs. Energy is purchased directly from the supplier, resulting in more competitive and, in most cases, more attractive prices than those of the Regulated Energy Market. Overall, buying energy on the free market lead to savings of between 10% and 20% on the electricity bill. In addition, tariff flag charges do not apply.

The reduction in energy consumption costs (Opex) has a direct impact on the Company's balance sheet, affecting various stakeholders. In addition, operational resilience is fun-

damental for all stakeholders: it can create long-term value for the Company and guarantee business continuity and our reputation, customer satisfaction, financial stability and regulatory compliance.

For all these reasons, investing in operational resilience is essential to mitigate risks and minimize interruptions. Thus, executives and shareholders participate in strategic decisions regarding investments in backup energy infrastructure. They can provide the financial support needed to ensure that the data center has adequate resources to deal with power outages.

Energy consumption at headquarters and data center (GJ)

	2021	2022	2023
Non-renewable fuels	497.00	23,027.34	34,837.70
Gasoline (automobile)	0.00	5.34	0.30
Diesel	497.00	0.00	1,455.50
LPG	0.00	23,022.00	33,381.90
Electricity consumption from the free energy market (no renewable)	58,999.62	57,978.53	0.00
Electricity consumption from the free energy market (renewable)	0.00	0.00	55,994.80
Total energy consumption	59,496.62	81,005.87	90,832.50

Note: The reference year is used to calculate reduction in energy consumption. This calculation is based on the monthly energy bill added up over the months of 2023.

Note 2: With regard to the consumption of non-renewable fuels, in 2022 and 2023, we had more power outages, maintenance and projects that required greater use of generators, compared to 2021.

Related Global Compact Principles:

Principle 1



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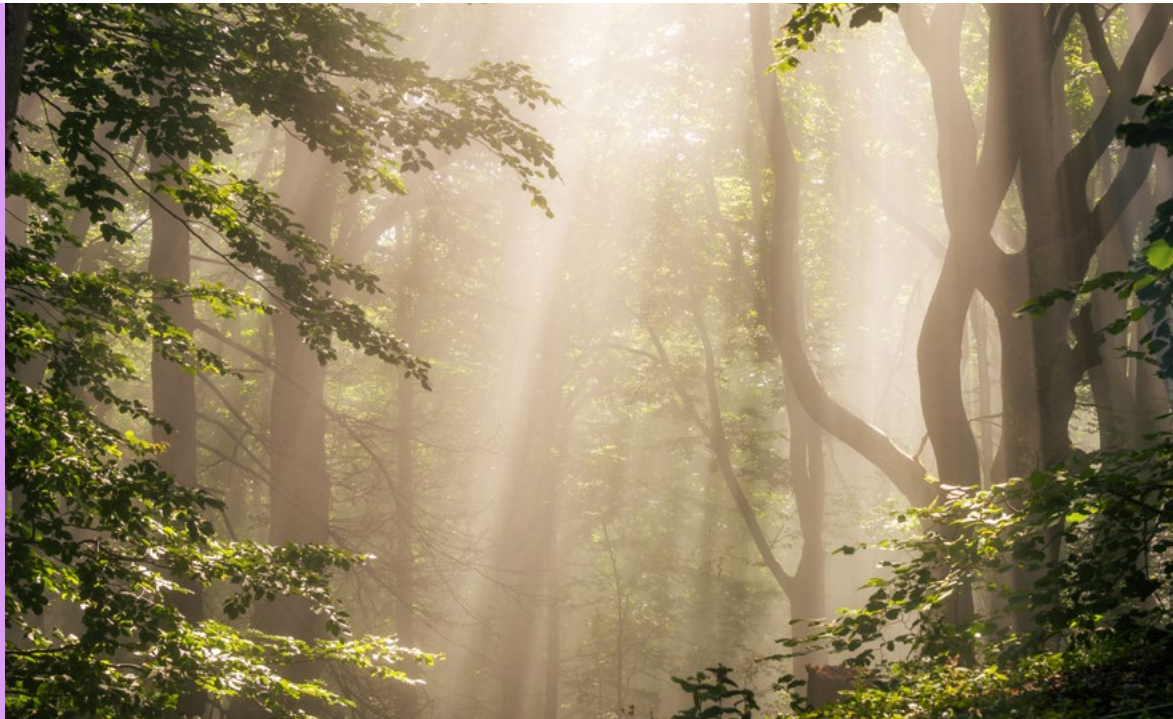
External Assurance

Mitigation of greenhouse gases

GRI 305-1, 305-2, 305-3 | 3-3 Material topic: Environmental preservation

Our focus has been on structuring strategies to achieve the 2030 Goals, which, in the environmental sphere, is to be a carbon neutral company. Working towards this goal has been a crucial decision for us, who are committed to sustainability, environment preservation and climate change mitigation.

This engagement was aligned with senior management, as they are aware that extreme weather events can ultimately lead to more expensive and less accessible energy, impacting the Company's financial plan.



We will achieve the goal of carbon neutrality by implementing measures that remove or offset an equivalent amount of carbon emissions from the atmosphere. Our focus will be on the following stages:

- **Emissions Reduction:** Identify measures to reduce our own carbon emissions;
- **Carbon Offsetting:** Even after reducing in-house emissions, it can be difficult to completely eliminate all carbon emissions. In these cases, we will invest in carbon offset projects.

To this end, we have completed our inventory of greenhouse gases (GHG) emitted in 2023. The gases inventoried were for scopes 1 and 2 and, for the first time, also for scope 3.

In 2023 we also completed the offsetting process by purchasing carbon credits for 2022 emissions, in accordance with the VERRA global registry, following the guidelines of the Verified Carbon Standards (VCS) program. It was the first time the Company bought carbon credits.

CDP

In 2023, we participated in CDP for the second consecutive year, and we are among the 29% of companies have reached the awareness level - score C - in their activity groups (in our case, in the Marketing and Web Services category).

The CDP is an international non-profit organization that is considered to be the financial sector's main initiative for climate change mitigation. Participation in the CDP Reporter Services Score Feedback allows us to measure our impact on the environment and gain a competitive advantage with investment funds that check the CDP score before investing.

Presence at CDP also connects shareholders and companies to leverage businesses related to global warming mitigation; maps the major causes of gas emissions, establishing a global standard for reporting on gas emissions and energy use; provides transparency on activities for customers and shareholders; and identifies new risks in the value chain.

Overall, a total of 826 metric tons¹ were offset using credits from the Santa Maria Reducing Emissions from Deforestation and Forest Degradation (REDD) project, aimed at the conservation of hectares of native forest in the Amazon. In addition, the benefits of the project will be certified by the CCB Standard at the "Gold Level" for all three categories: Climate, Community and Biodiversity.

The Santa Maria project has developed a rigorous monitoring system for the Amazon region, with eight bases surrounding the project area, along with satellite surveillance and audits with field visits. Local workers are hired to monitor the standing forest and logging, fulfilling the social purpose of integrating company and community, as well as developing the local economy by creating formal jobs in the region, in accordance with the Brazilian Consolidation of Labor Laws (CLT, in Portuguese). The Santa Maria Farm has a social inclusion program that includes hiring women and an equal pay policy.

¹ Quantity presented in the 2022 sustainability report, referring to the 2022 GHG inventory, considering scope 1 and 2.

The strategy of buying carbon credits plays a crucial role in achieving the ambitious short/medium-term goal of carbon neutrality more quickly, in a way that complements internal efforts to reduce emissions.

It also enables the offsetting of GHG emissions that cannot be reduced by the Company immediately. This path is particularly important for us, as we are part of the technology sector, where there is a challenge to completely avoid some emissions due to the nature of our operations.

Total GHG emissions, by scope (tCO₂e)

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

Scope	2022	2023
Scope 1 ²	122.2	182.27
Scope 2 ³	703.5	611.76
Scope 3 ⁴	-	943.29

Note: ²Gases included in the calculation: CO₂, CH₄, N₂O and HFCs.

³Gases included in the calculation: CO₂, CH₄ and N₂O.

⁴Gases included in the calculation: CO₂, CH₄ and N₂O. This is the first year we calculate Scope 3 emissions.

The consolidation approach was that of operational control.

The methodology used was that of the Brazilian GHG Protocol

Program and the IPCC's Fifth Assessment Report (AR5) as the GWP source.

Waste management

Recycling practices have a direct connection with our ESG agenda. Our actions include:

- We properly dispose of electronic materials that have lost their usefulness in order to avoid contamination of the environment and their improper use. Obsolete equipment is collected by an accredited company and reused whenever possible, as part of the circular economy process;
- We assess whether machines can be reconditioned to be donated to charity, respecting our policy on donations and sponsorships;
- In hardware disposal, there is a process of demagnetization and destruction of defective disks or those that will no longer be used/sold;
- We delete data entered into the machines to prevent any leaks of protected customer and employee information.

Our **Environmental Responsibility Policy** has been in place since 2022 with the aim of maximizing our contribution to sustainable development. It is applied to all the group's companies based on environmental, social, people management and I&D sustainability guidelines.

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Operating Performance

Over the last few years, we have devoted our efforts to acquiring 20 companies – 14 of them as of 2020 – with great growth potential and likely synergy within our solutions ecosystem and product portfolio. It has been a period of intense negotiations and work to carefully in-

corporate all brands under the LWSA umbrella.

All the acquired companies are now integrated in terms of operations, governance, as well as human resources. We are currently aligning the organizational culture and values of each business unit.

Our focus is on the organic growth of the companies and a potential corporate reorganization to gain efficiency, especially in terms of taxes.



The acquired companies' growth are or will be boosted by the synergies generated in our business environment through the following strategies:

Maximizing the customer base.

We aim to create a more integrated customer journey and further exploit cross-selling and up-selling opportunities on our current customer base to leverage the product and service sales, by: (i) migrating customers to higher value-added services; (ii) intensifying efforts to identify complementary products and services that can be offered; (iii) working more closely with partner developers to identify customer needs more quickly and nimbly; and (iv) optimizing online order flow to encourage the sale of complementary products and services.

Expansion of services and products offered in the e-commerce platform.

We believe that this segment offers the basic needs for any retail business to succeed in the digital world with the best cost-benefit ratio, and we will continue to anticipate market trends and demands by developing and expanding the offer of innovative products and services.

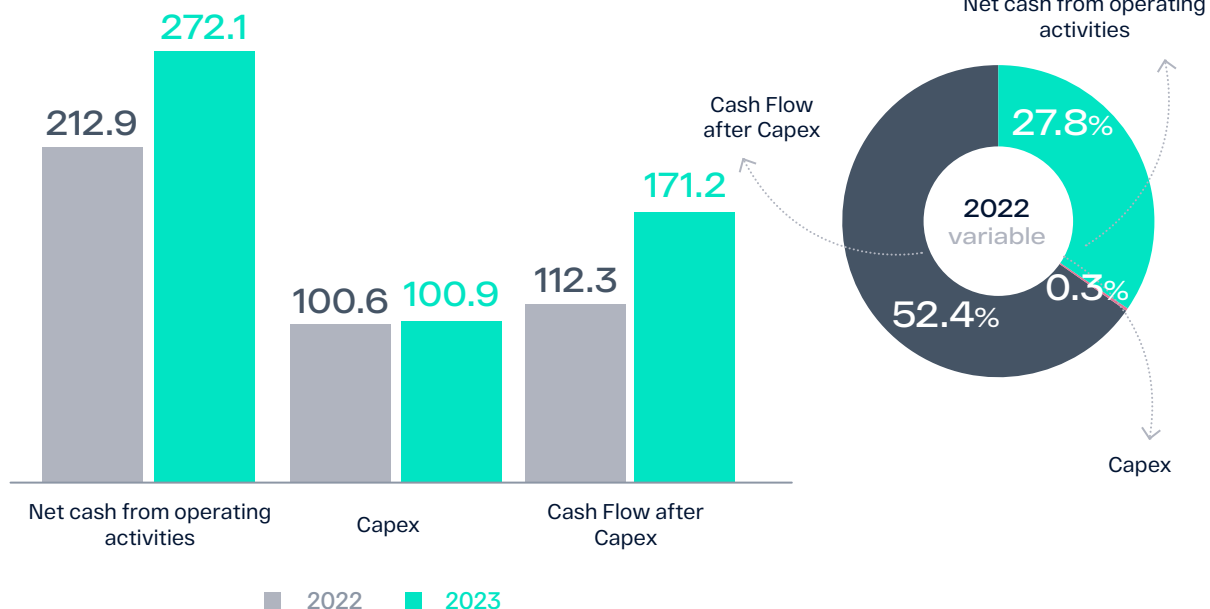


Created in April 2023, Wake is an integrated and robust hub of solutions for customers, the result of the merger of six consolidated and highly respected companies in the group: All in, Tray Corp, Samurai Experts, Ideris, Síntese and Squid. Aimed at leveraging operations, Wake offers a complete ecosystem of e-commerce solutions for large businesses.

Economic Performance

GRI 201-1 | 3-3 Material topic: Economic Performance

Cash generation | R\$ million



Direct economic value generated and distributed (R\$ thousand)

	2021	2022	2023
Added value for distribution	800,208	1,135,391	1,292,756
Net Revenue	800,208	1,135,391	1,292,756
Economic value distributed	449,402	627,600	661,218
Personnel (salaries and benefits)	292,639	421,777	478,748
Taxes, Fees and Contributions	153,028	205,823	151,655
Remuneration of third-party capital	3,735	0	0
Interest on equity and dividends	0	0	30,815
Retained economic value	350,806	507,791	631,538

The Company's consolidated adjusted EBITDA margin expanded by 2.6 p.p. in 2023 versus 2022, reaching

17.5%

The EBITDA margin of acquired companies was

2.9%

in 2023, moving up by 8.3 p.p. from 2022, when it reached -5.4%.

Adjusted EBITDA increased by

33.8%

compared to 2022, from 169.4 to 226.6 in 2023.

Net revenue was up by

13.9%

versus 2022, reaching R\$1,292.8 million in 2023. Cash flow after Capex was R\$171.2 million, 52.4% higher than in 2022.

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Performance by business

The commerce segment, the Company's flagship business, grew by 21.8% in 2023, accounting for 70% of revenue. In BeOnline / SaaS, there was growth of 8% compared to the last quarters of 2023 and 2022.

Net revenue / (R\$ million)

	2023	2022	vs 2022
Commerce	875.2	718.7	21.8%
% on consolidated figure	67.7%	63.3%	4.4 p.p.
BeOnline / SaaS	417.5	416.7	0.2%
% on consolidated figure	32.3%	36.7%	-4.4 p.p.
Net operating revenue - Consolidated	1,292.8	1,135.4	13.9%

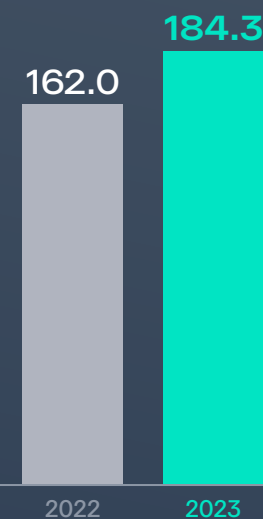
+18.5%

E-commerce ecosystem revenue in 2023

+26.5%

Revenue from e-commerce platform subscription in 2023

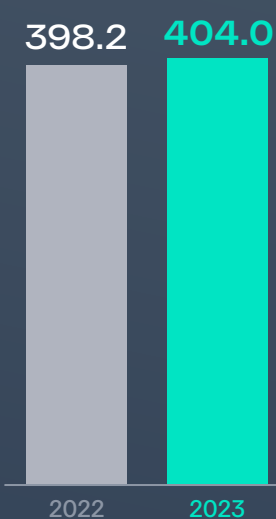
Commerce subscriber base | in thousands



Up by

13.7%

Eop customers - BeOnline/ SaaS



Up by

1.5%

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Employees

GRI 2-7

Information on employees, by employment contract and gender.

	2021			2022			2023		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Permanent employees	2,051	1,407	3,458	2,258	1,588	3,846	2,289	1,524	3,813
Temporary employees	51	6	57	41	5	46	30	3	33
Total	2,102	1,413	3,515	2,299	1,593	3,892	2,319	1,527	3,846

Information on employees, by employment type and gender.

	2021			2022			2023		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Employees without guaranteed hours	323	164	487	371	220	591	381	230	611
Full-time employees	1,779	1,249	3,028	1,928	1,373	3,301	1,938	1,297	3,235
Total	2,102	1,413	3,515	2,299	1,593	3,892	2,319	1,527	3,846



Information on employees, by employment contract and region.

Employment contract	Region	2021	2022	2023
Permanent employees	North	41	12	19
	Northeast	73	140	146
	Midwest	45	68	56
	South	1,116	1,197	1,177
	Southeast	2,183	2,428	2,415
	Abroad	0	1	1
	Total		3,458	3,846
Temporary employees	North	1	0	0
	Northeast	2	1	0
	South	18	13	6
	Southeast	36	32	27
	Total	57	46	33
Total	North	42	12	19
	Northeast	75	141	146
	Midwest	45	68	56
	South	1,134	1,210	1,183
	Southeast	2,219	2,460	2,442
	Abroad	0	1	1
	Total	3,515	3,892	3,846

Information on employees, by employment type and region.

Employment type	Region	2021	2022	2023
Employees without guaranteed hours	North	5	0	0
	Northeast	3	8	8
	Midwest	0	2	3
	South	129	156	173
	Southeast	350	425	427
	Total		487	591
Full-time employees	North	37	12	19
	Northeast	72	133	138
	Midwest	45	66	53
	South	1,005	1,054	1,010
	Southeast	1,869	2,035	2,014
	Abroad	0	1	1
	Total		3,028	3,301
Total	North	42	12	19
	Northeast	75	141	146
	Midwest	45	68	56
	South	1,134	1,210	1,183
	Southeast	2,219	2,460	2,441
	Abroad	0	1	1
	Total		3,515	3,892

Diversity

GRI 405-1

Percentage of individuals within governance bodies, by gender.

Gender	2021		2022		2023	
	Total	%	Total	%	Total	%
Men	8	72.7%	6	60.0%	6	75.0%
Women	3	27.3%	4	40.0%	2	25.0%
Total	11	100.0%	10	100.0%	8	100.0%

Percentage of individuals within the organization's governance bodies, by age group.

Age group	2021		2022		2023	
	Total	%	Total	%	Total	%
Under 30 years old	0	0.0%	0	0.0%	0	0.0%
30-50 years old	6	54.5%	3	30.0%	3	37.5%
Over 50 years old	5	45.5%	7	70.0%	5	62.5%
Total	11	100.0%	10	100.0%	8	100.0%

Percentage of individuals within governance bodies, by color or race.

Color or race	2021		2022		2023	
	Total	%	Total	%	Total	%
Black	0	0.0%	0	0.0%	0	0.0%
Brown	0	0.0%	0	0.0%	0	0.0%
White	11	100.0%	10	100.0%	8	100.0%
Indigenous people	0	0.0%	0	0.0%	0	0.0%
Yellow	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	10	100.0%	8	100.0%

Percentage of individuals within governance bodies, by People with Disabilities.

People with disabilities	2021		2022		2023	
	Total	%	Total	%	Total	%
People with disabilities	0	0.0%	0	0.0%	0	0.0%
People without disabilities	11	100.0%	10	100.0%	8	100.0%
Total	11	100.0%	10	100.0%	8	100.0%

Percentage of employees per employment category, by gender.

Employment category	Gender	2021		2022		2023	
		Total	%	Total	%	Total	%
CEO	Men	1	100.0%	1	100.0%	1	100.0%
	Women	0	0.0%	0	0.0%	0	0.0%
Vice-Presidents	Men	0	0.0%	0	0.0%	5	100.0%
	Women	0	0.0%	0	0.0%	0	0.0%
Executive Officers	Men	65	91.5%	60	88.2%	43	84.3%
	Women	6	8.5%	8	11.8%	8	15.7%
Managers	Men	127	70.9%	137	68.8%	150	68.2%
	Women	52	29.1%	62	31.2%	70	31.8%
Technical leaders	Men	45	83.3%	51	87.9%	43	86.0%
	Women	9	16.7%	7	12.1%	7	14.0%
Coordinators	Men	110	55.6%	142	54.0%	160	55.7%
	Women	88	44.4%	121	46.0%	127	44.3%
Specialists	Men	124	70.9%	133	69.3%	159	76.8%
	Women	51	29.1%	59	30.7%	48	23.2%
Supervisors	Men	12	44.4%	24	48.0%	16	41.0%
	Women	15	55.6%	26	52.0%	23	59.0%
Analysts III	Men	186	70.5%	246	68.5%	282	70.9%
	Women	78	29.5%	113	31.5%	116	29.1%

Employment category	Gender	2021		2022		2023	
		Total	%	Total	%	Total	%
Analysts II	Men	431	65.8%	552	64.8%	565	61.9%
	Women	224	34.2%	300	35.2%	348	38.1%
Analysts I	Men	807	60.8%	742	57.2%	696	58.0%
	Women	521	39.2%	556	42.8%	503	42.0%
Assistants	Men	88	34.6%	70	38.7%	84	38.0%
	Women	166	65.4%	111	61.3%	137	62.0%
Aides	Men	53	27.3%	60	28.4%	45	40.2%
	Women	141	72.7%	151	71.6%	67	59.8%
Interns	Men	30	44.8%	55	54.5%	38	48.7%
	Women	37	55.2%	46	45.5%	40	51.3%
Apprentices	Men	15	40.5%	19	38.8%	26	45.6%
	Women	22	59.5%	30	61.2%	31	54.4%
Total	Men	2,094	59.8%	2,292	59.0%	2,313	60.3%
	Women	1,410	40.2%	1,590	41.0%	1,525	39.7%
	Overall total	3,504	100.0%	3,882	100.0%	3,838	100.0%

Note: it does not consider members of the Board of Directors.

Percentage of employees, by employment category and age group

Employment category	Age group	2021		2022		2023	
		Total	%	Total	%	Total	%
CEO	Under 30 years old	0	0.0%	0	0.0%	0	0.0%
	30-50 years old	1	100.0%	1	100.0%	0	0.0%
	Over 50 years old	0	0.0%	0	0.0%	1	100.0%
Vice-Presidents	Under 30 years old	0	0.0%	0	0.0%	0	0.0%
	30-50 years old	0	0.0%	0	0.0%	4	80.0%
	Over 50 years old	0	0.0%	0	0.0%	1	20.0%
Executive Officers	Under 30 years old	9	12.7%	3	4.4%	0	0.0%
	30-50 years old	57	80.3%	59	86.8%	43	84.3%
	Over 50 years old	5	7.0%	6	8.8%	8	15.7%
Managers	Under 30 years old	37	20.7%	24	12.1%	21	9.5%
	30-50 years old	133	74.3%	166	83.4%	188	85.5%
	Over 50 years old	9	5.0%	9	4.5%	11	5.0%
Technical leaders	Under 30 years old	10	18.5%	13	22.4%	8	16.0%
	30-50 years old	43	79.6%	45	77.6%	42	84.0%
	Over 50 years old	1	1.9%	0	0.0%	0	0.0%
Coordinators	Under 30 years old	54	27.3%	64	24.3%	69	24.0%
	30-50 years old	142	71.7%	192	73.0%	213	74.2%
	Over 50 years old	2	1.0%	7	2.7%	5	1.7%
Specialists	Under 30 years old	51	29.1%	44	22.9%	50	24.2%
	30-50 years old	120	68.6%	143	74.5%	153	73.9%
	Over 50 years old	4	2.3%	5	2.6%	4	1.9%

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Percentage of employees, by employment category and age group.

Employment category	Age group	2021		2022		2023	
		Total	%	Total	%	Total	%
Supervisors	Under 30 years old	14	51.9%	26	52.0%	17	43.6%
	30-50 years old	13	48.1%	24	48.0%	22	56.4%
	Over 50 years old	0	0.0%	0	0.0%	0	0.0%
Analysts III	Under 30 years old	98	37.1%	128	35.7%	141	35.4%
	30-50 years old	163	61.7%	230	64.1%	254	63.8%
	Over 50 years old	3	1.1%	1	0.3%	3	0.8%
Analysts II	Under 30 years old	350	53.4%	468	54.9%	497	54.4%
	30-50 years old	303	46.3%	381	44.7%	412	45.1%
	Over 50 years old	2	0.3%	3	0.4%	4	0.4%
Analysts I	Under 30 years old	912	68.7%	867	66.8%	761	63.5%
	30-50 years old	413	31.1%	425	32.7%	426	35.5%
	Over 50 years old	3	0.2%	6	0.5%	12	1.0%
Assistants	Under 30 years old	190	74.8%	132	72.9%	146	66.1%
	30-50 years old	64	25.2%	48	26.5%	73	33.0%
	Over 50 years old	0	0.0%	1	0.6%	2	0.9%
Aides	Under 30 years old	143	73.7%	140	66.4%	68	60.7%
	30-50 years old	40	20.6%	62	29.4%	36	32.1%
	Over 50 years old	11	5.7%	9	4.3%	8	7.1%
Interns	Under 30 years old	61	91.0%	91	90.1%	70	89.7%
	30-50 years old	6	9.0%	10	9.9%	8	10.3%
	Over 50 years old	0	0.0%	0	0.0%	0	0.0%

Percentage of employees, by employment category and age group.

		2021		2022		2023	
Employment category	Age group	Total	%	Total	%	Total	%
Apprentices	Under 30 years old	37	100.0%	49	100.0%	57	100.0%
	30-50 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	Under 30 years old	1,966	56.1%	2,049	52.8%	1,905	49.6%
	30-50 years old	1,498	42.8%	1,786	46.0%	1,874	48.8%
	Over 50 years old	40	1.1%	47	1.2%	59	1.5%
	Overall total	3,504	100.0%	3,882	100.0%	3,838	100.0%

Note: it does not consider members of the Board of Directors.

Employee percentage, by employment category, color and/or race.

		2021		2022		2023	
Employment category	Color or race	Total	%	Total	%	Total	%
CEO	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 people	0	0.0%	0	0.0%	0	0.0%
	Yellow	0	0.0%	0	0.0%	0	0.0%
Vice-Presidents	Black	0	0.0%	0	0.0%	0	0.0%
	Brown	0	0.0%	0	0.0%	0	0.0%
	White	0	0.0%	0	0.0%	5	100.0%
	Indigenous people	0	0.0%	0	0.0%	0	0.0%
	Yellow	0	0.0%	0	0.0%	0	0.0%

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Employee percentage, by employment category, color and/or race.

Employment category	Color or race	2021		2022		2023	
		Total	%	Total	%	Total	%
Executive Officers	Black	0	0.0%	0	0.0%	0	0.0%
	Brown	3	4.5%	3	4.8%	3	5.9%
	White	63	95.5%	60	95.2%	43	84.3%
	Indigenous people	0	0.0%	0	0.0%	0	0.0%
	Yellow	5	7.6%	5	7.9%	5	9.8%
Managers	Black	8	4.5%	8	4.1%	10	4.5%
	Brown	18	10.2%	22	11.2%	25	11.4%
	White	151	85.3%	166	84.7%	180	81.8%
	Indigenous people	0	0.0%	0	0.0%	0	0.0%
	Yellow	2	1.1%	3	1.5%	5	2.3%
Technical leaders	Black	7	13.5%	2	3.6%	3	6.0%
	Brown	7	13.5%	5	9.1%	10	20.0%
	White	38	73.1%	48	87.3%	34	68.0%
	Indigenous people	0	0.0%	0	0.0%	0	0.0%
	Yellow	2	3.8%	3	5.5%	3	6.0%
Coordinators	Black	5	2.6%	11	4.3%	9	3.1%
	Brown	28	14.4%	38	14.8%	39	13.6%
	White	162	83.1%	208	80.9%	234	81.5%
	Indigenous people	1	0.5%	1	0.4%	0	0.0%
	Yellow	2	1.0%	5	1.9%	5	1.7%

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Employee percentage, by employment category, color and/or race.

Employment category	Color or race	2021		2022		2023	
		Total	%	Total	%	Total	%
Specialists	Black	10	5.8%	8	4.2%	8	3.9%
	Brown	28	16.2%	35	18.4%	40	19.3%
	White	135	78.0%	147	77.4%	156	75.4%
	Indigenous people	0	0.0%	0	0.0%	0	0.0%
	Yellow	2	1.2%	2	1.1%	3	1.4%
Supervisors	Black	1	3.7%	1	2.0%	1	2.6%
	Brown	0	0.0%	5	10.2%	3	7.7%
	White	26	96.3%	43	87.8%	35	89.7%
	Indigenous people	0	0.0%	0	0.0%	0	0.0%
	Yellow	0	0.0%	1	2.0%	0	0.0%
Analysts III	Black	13	5.0%	22	6.2%	25	6.3%
	Brown	47	18.1%	61	17.2%	90	22.6%
	White	200	76.9%	271	76.6%	276	69.3%
	Indigenous people	1	0.4%	1	0.3%	2	0.5%
	Yellow	3	1.2%	4	1.1%	5	1.3%
Analysts II	Black	39	6.0%	71	8.5%	90	9.9%
	Brown	122	18.8%	157	18.7%	177	19.4%
	White	488	75.2%	610	72.8%	634	69.4%
	Indigenous people	0	0.0%	4	0.5%	4	0.4%
	Yellow	6	0.9%	10	1.2%	8	0.9%

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Employee percentage, by employment category, color and/or race.

Employment category	Color or race	2021		2022		2023	
		Total	%	Total	%	Total	%
Analysts I	Black	99	7.6%	98	7.6%	92	7.7%
	Brown	257	19.7%	285	22.2%	260	21.7%
	White	951	72.8%	900	70.1%	827	69.0%
	Indigenous people	4	0.3%	1	0.1%	2	0.2%
	Yellow	17	1.3%	14	1.1%	18	1.5%
Assistants	Black	21	8.3%	22	12.2%	31	14.0%
	Brown	56	22.1%	56	31.1%	63	28.5%
	White	176	69.6%	102	56.7%	125	56.6%
	Indigenous people	0	0.0%	1	0.6%	1	0.5%
	Yellow	1	0.4%	0	0.0%	1	0.5%
Aides	Black	19	9.8%	20	9.5%	18	16.1%
	Brown	40	20.6%	50	23.7%	29	25.9%
	White	135	69.6%	141	66.8%	65	58.0%
	Indigenous people	0	0.0%	0	0.0%	0	0.0%
	Yellow	0	0.0%	0	0.0%	0	0.0%
Interns	Black	8	12.1%	7	7.1%	7	9.0%
	Brown	12	18.2%	22	22.2%	11	14.1%
	White	46	69.7%	70	70.7%	60	76.9%
	Indigenous people	1	1.5%	1	1.0%	0	0.0%
	Yellow	0	0.0%	1	1.0%	0	0.0%

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Employee percentage, by employment category, color and/or race.

Employment category	Color or race	2021		2022		2023	
		Total	%	Total	%	Total	%
Apprentices	Black	7	18.9%	5	10.2%	9	15.8%
	Brown	9	24.3%	11	22.4%	9	15.8%
	White	21	56.8%	33	67.3%	39	68.4%
	Indigenous people	0	0.0%	0	0.0%	0	0.0%
	Yellow	0	0.0%	0	0.0%	0	0.0%
Total	Black	237	6.8%	275	7.1%	303	7.9%
	Brown	627	17.9%	750	19.3%	759	19.8%
	White	2,593	74.0%	2,800	72.1%	2,714	70.7%
	Indigenous people	7	0.2%	9	0.2%	9	0.2%
	Yellow	40	1.1%	48	1.2%	53	1.4%
	Overall total	3,504	100.0%	3,882	100.0%	3,838	100.0%

Note: it does not consider members of the Board of Directors.



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Percentage of employees per employment category, per people with disabilities.

Employment category	People with disabilities	2021		2022		2023	
		Total	%	Total	%	Total	%
CEO	People with disabilities	0	0.0%	0	0.0%	0	0.0%
	People without disabilities	1	100.0%	1	100.0%	1	100.0%
Vice-Presidents	People with disabilities	0	0.0%	0	0.0%	0	0.0%
	People without disabilities	0	0.0%	0	0.0%	5	0.0%
Executive Officers	People with disabilities	0	0.0%	0	0.0%	0	0.0%
	People without disabilities	71	100.0%	68	100.0%	51	100.0%
Managers	People with disabilities	2	1.1%	2	1.0%	2	0.9%
	People without disabilities	177	98.9%	197	99.0%	218	99.1%
Technical leaders	People with disabilities	0	0.0%	1	1.7%	1	2.0%
	People without disabilities	54	100.0%	57	98.3%	49	98.0%
Coordinators	People with disabilities	0	0.0%	0	0.0%	2	0.7%
	People without disabilities	198	100.0%	263	100.0%	285	99.3%
Specialists	People with disabilities	0	0.0%	0	0.0%	1	0.5%
	People without disabilities	175	100.0%	192	100.0%	206	99.5%
Supervisors	People with disabilities	0	0.0%	0	0.0%	0	0.0%
	People without disabilities	27	100.0%	50	100.0%	39	100.0%
Analysts III	People with disabilities	1	0.4%	3	0.8%	3	0.8%
	People without disabilities	263	99.6%	356	99.2%	395	99.2%

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Employment category	People with disabilities	2021		2022		2023	
		Total	%	Total	%	Total	%
Analysts II	People with disabilities	7	1.1%	9	1.1%	14	1.5%
	People without disabilities	648	98.9%	843	98.9%	899	98.5%
Analysts I	People with disabilities	26	2.0%	42	3.2%	42	3.5%
	People without disabilities	1.302	98.0%	1.256	96.8%	1.157	96.5%
Assistants	People with disabilities	5	2.0%	5	2.8%	12	5.4%
	People without disabilities	249	97.6%	176	92.1%	209	94.6%
Aides	People with disabilities	6	3.1%	15	7.1%	12	10.7%
	People without disabilities	188	96.9%	196	92.9%	100	89.3%
Interns	People with disabilities	0	0.0%	0	0.0%	0	0.0%
	People without disabilities	67	100.0%	101	100.0%	78	100.0%
Apprentices	People with disabilities	0	0.0%	1	2.0%	1	1.8%
	People without disabilities	37	100.0%	48	98.0%	56	98.2%
Total	People with disabilities	47	1.3%	78	2.0%	90	2.3%
	People without disabilities	3,457	98.7%	3,804	98.0%	3,748	97.7%

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Training and Education

GRI 404-1

Average training hours per employee, by gender.

Gender	2021		2022		2023	
	Total hours	Average hours	Total hours	Average hours	Total hours	Average hours
Men	3,128.8	2.9	10,110.1	4.8	6,216.5	3.3
Women	5,137.8	2.3	4,696.4	3.8	3,502.2	3.0
Total		8,266.5		14,806.5		9,718.7

Average training hours per employee, by employment category.

Employment category	2021		2022		2023	
	Total hours	Average hours	Total hours	Average hours	Total hours	Average hours
Vice-Presidents	0.0	0.0	0.0	0.0	35.0	2.9
Executive Officers	88.5	1.8	75.0	2.4	971.2	3.0
Managers	780.5	1.9	567.6	1.9	204.0	2.0
Supervisors	38.0	2.2	51.5	2.0	84.5	3.4
Coordinators	923.0	1.9	1,036.7	2.2	363.0	3.4
Technical leaders	74.0	2.5	111.9	2.7	1,089.0	2.5
Specialists	363.5	2.4	431.9	2.7	38.5	3.2
Analysts I	362.0	4.3	9,050.6	11.0	3,869.5	3.3
Analysts II	1,234.5	2.4	1,220.4	2.1	1,760.0	3.9
Analysts III	657.5	2.1	753.6	2.0	692.5	3.6
Assistants	400.0	1.5	975.0	4.1	241.0	3.3
Aides	9.0	3.0	7.5	0.9	31.0	2.8
Interns	36.0	2.1	434.3	1.7	308.0	2.7
Total training hours		4,966.5		14,716.0		9,687.2

Note: Data were defined for corporate programs and actions (e.g., internship program, trainee program, leadership program, etc.), as well as for actions focused on LWSA units - Backoffice, Locaweb and Nextios. One-off initiatives from other units were not included in these data. Moreover, the calculation considered total sum of training hours/total sum of training participations.

GHG Emissions

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

Total GHG emissions, by scope (tCO₂e).

Scope	Category	2022	2023
Scope 1 ¹	Stationary combustion	88.85	100.52
	Mobile combustion	6.95	23.68
	Fugitive emissions	26.40	58.07
	Total	122.20	182.274
Scope 2 ²	Electricity	703.50	611.76
	Total	703.50	611.76
Scope 3 ³	Waste from operations	-	10.24
	Business travel	-	313.31
	Emissions from Commuting	-	619.74
	Total	-	943.29

Note:

¹ Gases included in the calculation: CO₂, CH₄, N₂O and HFCs. Total biogenic CO₂ emissions was 23.94 tCO₂e.

² Gases included in the calculation: CO₂, CH₄ and N₂O.

³ Gases included in the calculation: CO₂, CH₄ and N₂O. Total biogenic CO₂ emissions was 238.65 tCO₂e. This is the first year we calculate Scope 3 emissions.

The reference year for the calculation was 2023, the first year with comparable emissions. The consolidation approach was that of operational control. The methodology used was that of the Brazilian GHG Protocol Program and the IPCC's Fifth Assessment Report (AR5) as the GWP source.

Total biogenic GHG emissions, by scope (tCO₂e).

Scope	Category	2022	2023
Scope 1	Stationary combustion	8.97	11.71
	Mobile combustion	5.87	12.23
	Total	14.84	23.941
Scope 3	Business travel	-	4.40
	Emissions from Commuting	-	234.24
	Total	-	238.64

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Declaration of use	LWSA reported in accordance with the GRI Standards for the period from January 1, 2023 to December 31, 2023
GRI 1 used	GRI 1: Fundamentals 2021
Applicable GRI Sector standard(s)	Not applicable

GRI standard	Content		Page/answer	Omission		
				Omitted requirements	Reason	Explanation
General content						
The organization and its reporting practices						
GRI 2: General disclosures 2021	2-1	Organizational details	8			
	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				
	2-5	External assurance	3			
Activities and workers						
GRI 2: General disclosures 2021	2-6	Activities, value chain and other business relationships	10, 72			
	2-7	Employees	49, 63, 91			
	2-8	Workers who are not employees	50, 64			
Governance						
GRI 2: General disclosures 2021	2-9	Governance structure and composition	18, 19, 24, 25, 26, 27			
	2-10	Nomination and selection of the highest governance body	19, 21			
	2-11	Chair of the highest governance body	19		2-11 b)	Not applicable
	2-12	Role of the highest governance body in overseeing the management of impacts	19, 23			
	2-13	Delegation of responsibility for managing impacts	19			

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GRI standard	Content		Page/answer	Omission		
				Omitted requirements	Reason	Explanation
Governance						
GRI 2: General disclosures 2021	2-14	Role of the highest governance body in sustainability reporting	3			
	2-15	Conflicts of interest	32		2-15 b ii)	Not applicable
	2-16	Communication of critical concerns	19			
	2-17	Collective knowledge of the highest governance body	19		2-17 a)	Not applicable
	2-18	Evaluation of the performance of the highest governance body	19, 22			
	2-19	Remuneration policies	29			
	2-20	Process to determine remuneration	29		2-20 a iii); 2-20 b)	Not applicable
	2-21	Annual total compensation ratio	29		2-21 a); 2-21 b); 2-21 c)	Confidentiality
Strategy, policies and practices						
GRI 2: General disclosures 2021	2-22	Statement on sustainable development strategy	4			
	2-23	Policy commitments	32		2-23 a iii)	Not applicable
	2-24	Embedding policy commitments	32			
	2-25	Processes to remediate negative impacts	32, 40			
	2-26	Mechanisms for seeking advice and raising concerns	32			
	2-27	Compliance with laws and regulations	32		2-27	Not applicable
Stakeholder engagement						
GRI 2: General disclosures 2021	2-29	Approach to stakeholder engagement	47			
	2-30	Collective bargaining agreements	61			
Material topics						
GRI 3: Material Topics 2021	3-1	Process to determine material topics	11, 14			
	3-2	List of material topics	11, 14			
Inclusion and Diversity within the Organization						
GRI 3: Material Topics 2021	3-3	Management of material topics	63		3-3 f)	Not applicable
GRI 405: Diversity and Equal Opportunities 2016	405-1	Diversity of governance bodies and employees	31, 63, 94			

GRI standard	Content		Page/answer	Omission		
				Omitted requirements	Reason	Explanation
Promoting entrepreneurship in local communities						
GRI 3: Material Topics 2021	3-3	Management of material topics	75		3-3 c); 3-3 d i); 3-3 d ii); 3-3 e iii); 3-3 e iv); 3-3 f)	Not applicable
Employee management						
GRI 3: Material Topics 2021	3-3	Management of material topics	51			
GRI 401: Employment 2016	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	61			
GRI 403: Occupational health and safety 2018	403-1	Occupational health and safety management system	70			
	403-2	Hazard identification, risk assessment, and incident investigation	70			
	403-4	Worker participation, consultation, and communication on occupational health and safety	70			
	403-5	Worker training on occupational health and safety	70			
GRI 404: Training and education 2016	404-1	Average hours of training per year per employee	56, 59, 105			
	404-2	Programs for upgrading employee skills and transition assistance programs	56		404-2 b)	Not applicable
Ethics and governance in business						
GRI 3: Material Topics 2021	3-3	Management of material topics	32			
GRI 205: Anti-corruption 2016	205-2	Communication and training about anti-corruption policies and procedures	32, 38		205-2 c)	Not applicable/ Not available
	205-3	Confirmed incidents of corruption and actions taken	32		205-3 a); 205-3 b); 205-3 c); 205-3 d)	
Energy management						
GRI 3: Material Topics 2021	3-3	Management of material topics	80		3-3 c); 3-3 e iii); 3-3 e iv)	Not applicable

GRI standard	Content		Page/answer	Omission		
				Omitted requirements	Reason	Explanation
Energy management						
GRI 302: Energy 2016	302-1	Energy consumption within the organization	80			
	302-4	Reduction of energy consumption	80		302-4 d)	Not applicable
Economic performance						
GRI 3: Material Topics 2021	3-3	Management of material topics	88			
GRI 201: Economic performance 2016	201-1	Direct economic value generated and distributed	88		201-1 b)	Not applicable
Security, customer privacy and information management						
GRI 3: Material Topics 2021	3-3	Management of material topics	41			
GRI 418: Customer privacy	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	44			
Environmental preservation						
GRI 3: Material Topics 2021	3-3	Management of material topics	82		3-3 c); 3-3 e i); 3-3 e iii)	Not applicable
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	82, 83, 106		305-1-d-iii	Not applicable
	305-2	Energy indirect (Scope 2) GHG emissions	82, 83, 106		305-2-b e 305-2-d-iii	Not applicable
	305-3	Other indirect (Scope 3) GHG emissions	82, 83, 106		305-3-d-iii	Not applicable

GRI standard	Content	Page/answer	Omission		
			Omitted requirements	Reason	Explanation
Environmental preservation					
GRI 305: Emissions 2016	305-4	GHG emissions intensity	The GHG emissions intensity index for LWSA is 0.491 tCO ₂ e per employee. The specific metric adopted was: the total number of employees and the total value of the LWSA's emissions (all companies). The following calculation was used: carbon intensity metric = n. employees/ total emissions (E1 + E2 + E3) ~ 3,540/1,737.33 = 0.491 tCO ₂ e per employee. The calculation included scopes 1, 2 and 3 and the gases CO ₂ , CH ₄ , N ₂ O and HFCs.		
Integration of sustainable considerations for data center needs					
GRI 3: Material Topics 2021	3-3	Management of material topics	80	3-3 c); 3-3 e i); 3-3 e iii)	Not applicable
Digital Inclusion					
GRI 3: Material Topics 2021	3-3	Management of material topics	77		

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