



2024 Sustainability Report

lwsa

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About this Report

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

This is LWSA's fourth Annual Sustainability Report, covering the period from January 1 to December 31, 2024. Committed to transparency and in accordance with best practices, we present in this report our main achievements for the period, aligned with our strategy to advance in sustainable initiatives in the governance, social and environmental spheres and in our purpose of exerting a positive impact on society.

The report was prepared according to the Global Reporting Initiative (GRI) standards and the MSCI ESG classification, thus providing greater comparability and consistency for the information presented, and is in line with the United Nations' Sustainable Development Goals (SDG).

This publication presents information on the activities of the operating companies that comprise our ecosystem, through

which we operate in the market, namely: LWSA S/A; Síntese; Bagy; Bagy Sul; Credisfera; Samurai Holding; LwTelecom; Wake Commerce; It Capital (Delivery Direto); CPlug; Yapay; Octadesk; LwCommerce; Wake Creators; Lwk; Cyberweb; LwVentures; Organisys Payments; PagCerto; Ideris; Melhor Envio; Samurai Desenvolvimento; and Vindi Pagamentos.

All business units are currently controlled by LWSA. Mergers were fully integrated into LWSA.

Information disclosed in this report, as well as all ESG-related initiatives and decisions, has been analyzed and approved by the Board of Directors, the Company's highest governance body. The report has also been submitted to external assurance, a process independent of LWSA.

For queries or suggestions about this report, please contact us by email at: ri@lwsa.tech.

Reading tools



Summary



Interactive

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External link

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



Related Global
Compact
Principles



Related SDGs

(See page XX)
External link



Rafael Chamas
LWSA's CEO



Our commitment to innovation, synergy between brands, and operational efficiency allowed us to make significant progress in 2024. More than just integrating solutions, we strengthened a unique corporate culture focused on customer experience, social and environmental responsibility, and generating sustainable value for the LWSA ecosystem.



Message from Management

GRI 2-22

We appreciate the value of synergy. A good system is one that connects to others, combining solutions, processes, tools, information and services. This concept is essential in different aspects of our lives: it is impossible to talk about ESG practices without synergy, just as it would be unimaginable to think about collective balance and well-being without it.

In 2024, in particular, we were able to strengthen this concept at LWSA, by consolidating our ecosystem, interacting with our brands and connecting our services and solutions. All of this was focused not only on results but, above all, on our reason for being: people.

We provide an essential service to the Brazilian economy, and our mission is to support entrepreneurship in Brazil. Our aim is to contribute to the country's development and create jobs, helping retailers and en-

trepreneurs to open and expand their businesses. Even in the face of a challenging environment, we continue to invest heavily in cutting-edge technology, making it accessible to small- and medium-sized businesses, people and companies that are unlikely to afford it, by providing simple and affordable access. As a result, our customer base increased substantially during this period.

Over time, our strategy has been to make acquisitions with a very clear focus: adding increasing value to our customers. We started by supporting them in creating a website and then offered the opportunity to create an online store to sell their products. Then, we began to offer logistics and ERP/POS solutions, thus guaranteeing them a more competitive position in the market, and enabling the use of payment methods such as credit cards, bank slips and Pix in their e-commerce platform.

Everything we do is designed to serve our customers. With this in mind, we have identified the tools they use the most, improve them or create new solutions. We never stop investing in innovation. Our team of employees, executives and entrepreneurs is always attentive to customer feedback, generating new ideas to keep adding value.

We do not just offer one product but a diversified portfolio that includes ERP/POS, e-commerce, logistics and payment services. This operational diversity is what sets us apart. We are resilient to crises: over the past 26 years, we have endured challenging times in the Brazilian economy. Our business model is very sustainable, whether through leading or consolidated products or through subscription services. This is how we have gained an important presence in the Brazilian e-commerce market, with a share of more than 20%.

In 2024, we made significant progress in our governance. We reviewed, improved and standardized processes; restructured departments; unified our Human Resources Department, disseminating best practices within the companies and, thus, creating a single culture. We standardized policies for health, customer service, benefits and sustainability initiatives, among others, and conducted more structured campaigns.

As a result of a consistent succession plan, in 2024, we completed a CEO transition at LWSA, a process conducted with maturity and experience and based on partnership. We have evolved significantly in terms of efficiency and processes, aware that growth requires good structure. And that is what we have done to keep up the development pace that we aim to achieve in a consistent, robust and sustainable way.

In terms of performance, in 2024, LWSA recorded important productivity gains, reflected in the gross and EBITDA margins, which were substantially higher compared to previous periods and whose operating indicators showed consistent performance, maintaining an strong growth trend despite the macroeconomic scenario for retail and e-commerce in Brazil.

We are a company that continues to gain efficiency and scale. We improved our profitability, margin and cash generation ratios, which led to significant gains for our investors and shareholders. In 2024, we made a very significant move, by paying dividends and repurchasing shares, which, in a nutshell, reflects our commitment to reinvesting in the Company.

Looking toward the future, on a short-term horizon, we will continue to gain a lot of value from our existing assets. In

the medium term, we expect to continue expanding our business to new customers and areas. In the long term, we plan to invest in new products and services. From a financial point of view, our goal is to ensure our customers that we can serve, support and help them grow and thrive in their businesses, and to have sustainability to support this growth and investment in innovation. Therefore, we create value for the Company, our customers and society.





WHO WE ARE

LWSA

GRI 2-1

Comprising 11 business units and 14 brands, LWSA is currently an ecosystem of solutions for the entire digitalization journey of entrepreneurs, regardless of their segment or size, aiming to help create and grow businesses through technology.

We have a very sustainable business model, whether through leading and consolidated products or subscription services, which include e-commerce platforms; Enterprise Resource Planning (ERP); marketplace integration; Point of Sale (POS); recurrence; lead generation; payments; credit and logistics, among others.

We are currently one of Brazil's largest technology groups. 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. Our business trajectory began with Locaweb, in 1997,

with a single Windows-based server located in California (USA). Then, we launched Linux-based website hosting services.

In February 2020, Locaweb (LWSA3) went public on the Brazilian stock exchange. With funds raised in the IPO, we acquired strategic companies that complement our solution portfolio. We remained focused on innovation, seeking to anticipate market and customer demands.

In late 2023, we dropped the Locaweb Company name and created a new brand. In addition to being the ticker of the Company's shares traded on the B3 since the

beginning – a great achievement in our history –, the LWSA brand reinforces the sense of belonging and unity, fostering an integrated corporate culture. It clearly presents to the market our portfolio of solutions in our five business areas.

We are headquartered in São Paulo and have business units across seven other Brazilian cities: Marília (SP); Belo Horizonte (MG); Curitiba (PR); Porto Alegre (RS); Novo Hamburgo (RS); Pelotas (RS); and Bento Gonçalves (RS).





Our values

Our values are more than just internal principles; they underpin how we act, based on responsibility, ethics and positive impact. Passion for what we do, coupled with creativity, curiosity and persistence, drives us to turn ideas into concrete actions, always with quality and focused on sustainable results.

We value teamwork, honesty and collaboration as principles that strengthen our culture and broaden our reach. We believe that success is a collective achievement, that a light atmosphere fosters innovation and that doing things well is a commitment to all our stakeholders. These values guide our journey and reinforce our role in building a fairer and more sustainable future.

We value teamwork, honesty and collaboration as principles that strengthen our culture and broaden our reach.

Rebranding

With the publication of this report, we celebrate our first year as the LWSA ecosystem. In 2024, we began consolidating our brand with a project to incorporate the Business Units into the LWSA ecosystem, a move that goes beyond operational synergy between products; it also means administrative integration, with the creation of a shared services center, unification of departments and greater integration within the Company.

Since the merger of subsidiaries (acquired since the IPO) into the LWSA Holding Company, the business units have been treated as branches of a single company, facilitating accounting, financial, corporate and bureaucratic issues.

The rebranding also required a major organizational restructuring in human resources management, integrating and streamlining the different HR areas of each acquired company to build a single unit that allows for better management, connection and efficiency.

This rebranding was designed to meet the following goals:

- Boost customer success through a more integrated journey;
- Optimize our business indicators;
- Boost our cross-selling strategy;
- Increase average ticket revenue;
- Reduce cancellation rates; and
- Minimize customer acquisition costs by allowing them to see and try all the solutions we offer for their businesses.

Today, we are an ecosystem of possibilities, both for customers and potential customers, and for employees, who benefit from a wider scope of professional opportunities with mobility between the various LWSA companies.

We rely on a solid governance structure and, in 2024, we conducted succession planning for our CEO with strong alignment across our business areas. We also made changes aimed at intensifying our focus on LWSA's 2025-2029 Strategic Plan, which defines our objectives and the results we seek to obtain in the next five years.

Throughout 2024, we held monthly business planning meetings, set indicators, metrics and reports, and built dashboards that will guide our actions over the coming years. We have set performance ratios, focused on synergy between the units – one of our priorities – to guarantee better results. Our aim is to look more and more at the customer, offering them a more complete basket of products and services that meet their needs.

Business units and brands

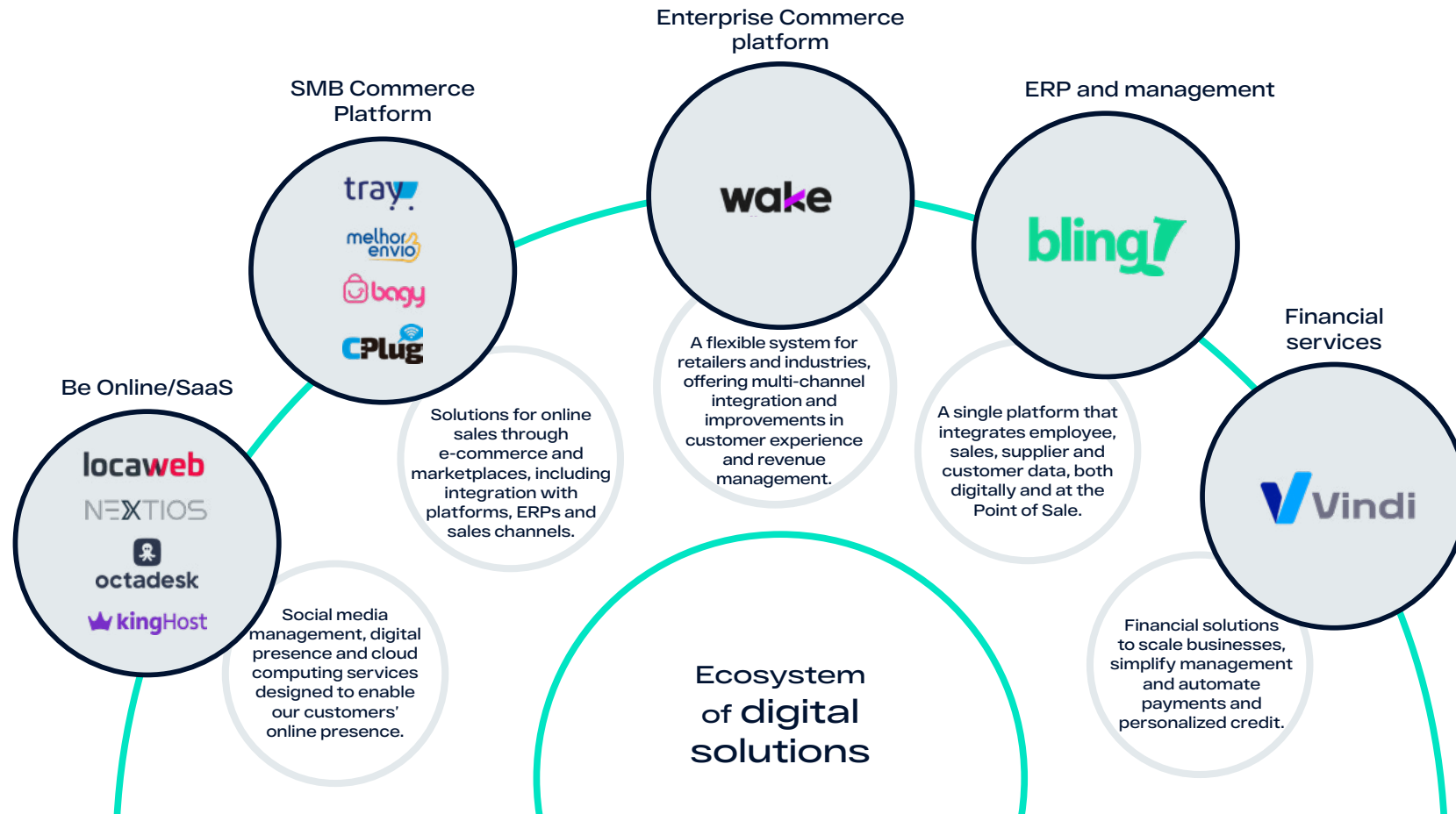
GRI 2-6

At LWSA, our customers see their companies come to life and grow, supported by all the tools we offer so that they can thrive in the digital environment. They can do so through sales channels,

greater efficiency in managing their logistics and better management of their cash flow through ERP, as well as access to credit when necessary, geared towards expanding their businesses.

We are an ecosystem in constant expansion and currently hold a 22% share of the e-commerce market. We operate in two major business segments: BeOnline and Software as a Service & Solutions (BeOnline/SaaS) and Commerce, divided into five macrosegments of our organizational structure, called our business verticals.

tions (BeOnline/SaaS) and Commerce, divided into five macrosegments of our organizational structure, called our business verticals.



Note: the chart refers to the organization of business units in 2024.

Materiality

GRI 3-1, 3-2

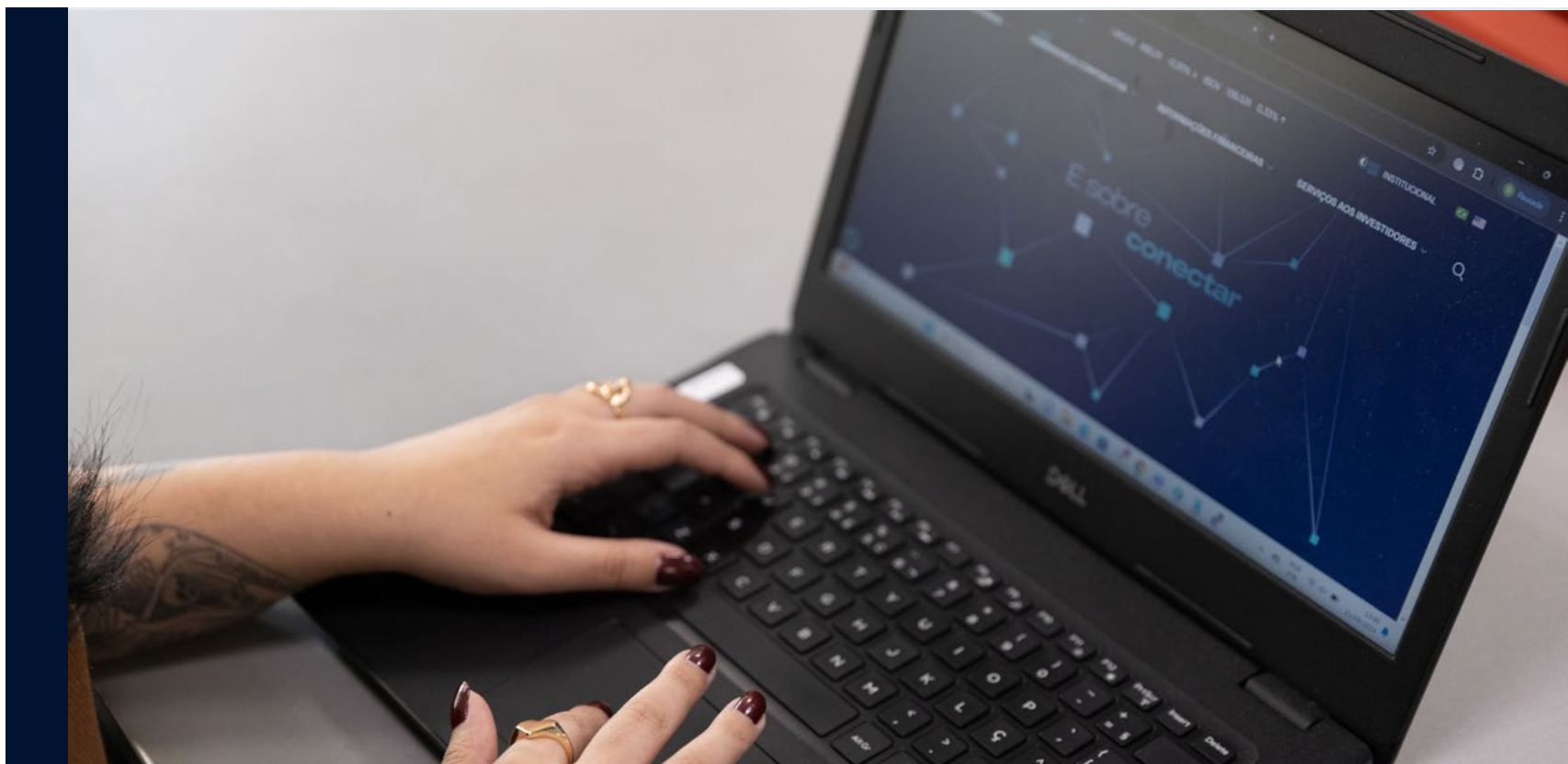
In 2024, we prepared our second Materiality Matrix through a structured and in-depth process, supported by a specialized consultancy. This work considered external references, internal documents and benchmarking with sector peers, as well as interviews with strategic business leaders, a survey of internal and external stakeholders, impact assessment, fine-tuning with the C-Level and approval by the Human Resources Committee.

The process followed the GRI methodology and the double materiality principles, covering both impact materiality and financial materiality. The study aimed to ensure that the topics identified reflected both the reality of our business and the expectations of stakeholders.

We began the materiality study by analyzing market frameworks and widely known global guidelines, such as GRI, SASB, MSCI, World Economic Forum, Sustainalytics etc. We also conducted benchmarking studies of the materiality matrices of peers relevant to our business and analyzed internal documents, including the Reference Form, Risk Matrix and media studies. These sources helped us to identify the ESG

topics most frequently highlighted in the market and at LWSA, creating the basis for a consultation exercise with the Board of Directors, Executive Board, investors, employees, suppliers, customers, partners, the community and NGOs.

The list of topics was validated with key stakeholders. We also gathered their perception on several topics, such as the main impacts to which the Company is exposed, management strengths and growth opportunities in the market.



Process steps



LWSA'S 2024 material topics:



Responsible governance
(Ethics, Compliance, Corporate governance, and Transparency);



Information security
(Data protection and privacy);



Customer experience
(Focus on customer satisfaction);



Employee journey
(Attraction, development and retention; Health and well-being);






Innovation and technology
(Focus on entrepreneurship).

Impact study

We conducted our impact study in parallel with the materiality process, allowing us to identify the most relevant impacts of our activities and business relationships on the economy, the environment, people and the business itself.

Material topic	Description	Impacts
 <p>Responsible governance Indicators: GRI 3, 3-3, 205, 205-2, 205-3</p>	<p>Set of processes, customs, policies, laws, regulations and institutions that govern the way a company is run, monitored and encouraged, including how ESG aspects are considered in management. It includes the composition and compensation of the board of directors and executive board, as well as transparency in accountability and stakeholder relations. It also addresses issues related to ethics, integrity and anti-corruption as well as the measures and mechanisms applied by the Company to manage this issue.</p>	<ul style="list-style-type: none"> (+) Fostering the ethical and moral principles that govern the Company, leading to greater cohesion among team members and a more amicable and collaborative environment. (+) Building a positive image of the organization before shareholders, customers, partners and society in general, with clear rules on behavior and interactions, as well as an anonymous reporting channel for cases of misconduct. (-) Sanctions, fines, suspension of activities and liability (civil, administrative), resulting from the absence of anti-corruption and money laundering-prevention mechanisms. (+) Improved quality of decision-making, avoiding illegalities and reducing conflicts. (+) Greater transparency and clarity in internal processes and in assigning responsibility, increasing credibility with stakeholders. (+) Attracting talent and new investments, leading to improved internal efficiency and greater added value. (+) Keeping the Company operating at acceptable standards of safety, social and environmental responsibility and legal compliance.
 <p>Information security Indicators: GRI 3, 3-3, 418, 418-1</p>	<p>Actions and measures for the proper functioning of internal systems and the security of corporate and member information on the data network, preventing cyber threats or attacks; privacy and security of customer data, guaranteeing service and compliance with the General Data Protection Act (LGPD, in Portuguese).</p>	<ul style="list-style-type: none"> (-) Leakage of customer or employee data. (-) Documentation gaps and lack of formalization of processes in accordance with the LGPD. (-) Lack of data purging. (+) Data processing policies. (+) Contractual compliance with the LGPD. (+) Communication Channel for data subjects.

Material topic	Description	Impacts
 <p>Customer experience Indicators: GRI 3; 3-3</p>	<p>Matters related to customer satisfaction and experience with the product/service provided.</p>	<ul style="list-style-type: none"> (+) Supporting customer digitalization and the beginning of online transition. (+) Progress of satisfaction indices. (-) Customer churn due to service/product unavailability.
 <p>Employee journey Indicators: GRI 3, 3-3, 404, 401-1, 404-2</p>	<p>Attracting and retaining talent is related to the benefits and working conditions that the Company offers its workforce. These conditions are reflected in new employee hires and turnover rates. They also involve training employees to develop and improve skills and knowledge at work.</p>	<ul style="list-style-type: none"> (+) Ongoing update of the skills and abilities needed by the Company. (+) Trained employees who become more attractive to the market and seek out new opportunities. (+) Improved customer experience with better-trained employees. (-) Increased costs with the recruitment and selection process. (+) Increased engagement. (+) Skillful staff. (-) Quota of employees with disabilities not met. (+) Progress in the share of women and non-white and transgender people, as well as age diversity. (-) Low share of Black people in senior management and board positions. (+) I&D Committee (corporate volunteering). (-) Increase in health insurance claims/occurrences. (-) Increase in absenteeism.
 <p>Innovation and technology Indicators: GRI 3; 3-3</p>	<p>Innovation in the Company's processes, adoption of new technologies, research and development (R&D), digital transformation of processes and products; LWSA's actions to promote entrepreneurship among customers and communities.</p>	<ul style="list-style-type: none"> (+) Market expansion. (+) Increased competitiveness. (+) Contribution to improving customers' businesses. (+) Market training. (+) Digital inclusion. (+) Encouraging business formalization.

2030 Goals

GRI 3-1, 3-2

In 2024, our actions were guided by scenario analyses and studies carried out in 2023, aimed at achieving the 2030 targets, described below:

Environmental goals

Being a carbon neutral Company, i.e., neutralizing the greenhouse gas emissions from all our operations. We have already offset GHG emissions through the purchase of carbon credits, and we have started mapping Scope 3 emissions to advance on this front.

Related SDGs:



Social goals

Giving equal pay: eliminating pay disparity between genders, races or ethnic groups. We are conducting a comprehensive quantitative study to understand salary differences related to gender and race, isolating factors such as seniority and performance, at all hierarchical levels and units of the Company. In addition, we are redesigning our job and salary structure ([read more in page 36](#)).

Related SDGs:



Fighting disparities through quality education: we believe that education is an essential tool for reducing inequalities. Our educational initiatives are aimed at community development ([read more in page 86](#)). We sponsor and encourage new ideas to expand opportunities and generate positive impact.

Related SDGs:



Governance goals

Mapping the entire supply chain: we are committed to monitoring possible human rights violations or corruption cases in our supply chain, ensuring compliance with current legislation and regulations. In 2024, we contracted a purchasing system that helps assess risks, compliance, and ESG criteria of our suppliers. ([read more in page 85](#)).

Related SDGs:



Highlights



1st anniversary

of business unit
integration.

22.3%

growth in e-commerce
platform subscription
revenue in 2024.



+ R\$ 190 million

of distribution to
shareholders, through
share buybacks and
dividend payments.

3 p.p.

increase in the Company's
adjusted EBITDA margin
compared to 2023.



Streamlining of the product offering structure and integration
for better customer experience and journey.



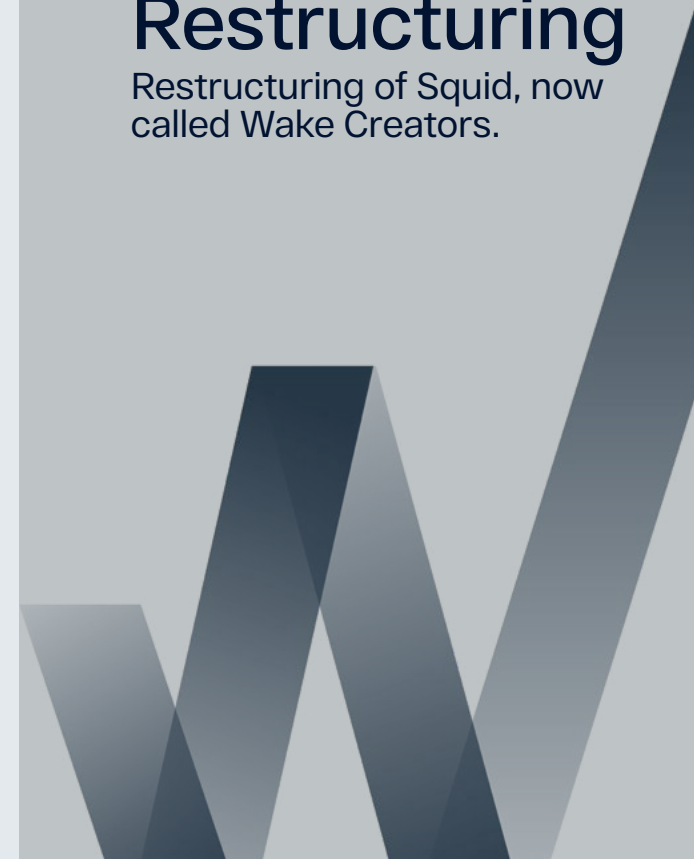
In payments and financial solutions, we received approval from the Brazilian Central Bank to operate as a Payment Institution (IP, in Portuguese), after which we started offering the digital account product.

Expansion of e-commerce platforms, to offer a complete omnichannel solution.



Restructuring

Restructuring of Squid, now called Wake Creators.



2024 achievements



- **Highlight in the B3's Diversity Index (IDIVERSA B3).**

- **Great Place to Work – diversity rankings:**

- **Ethnicity and race:** 8th place;

- **LGBTQIAPN+:** 10th place; and

- **Women:** 22nd place.



- **ABComm Digital Innovation Award 2024:** 2nd place in the ranking of the three best companies in the Financial Solutions for E-Commerce segment.
- **Recognition in the B2B Awards 2024** in the Tools for E-commerce category.



- **GPTW: 12th** Best Information Technology Company.
- **GPTW: 3rd** place in SP ranking.
- **GPTW: 16th** place in Brazil ranking.
- **FEEx: 2nd** place in the medium-sized company ranking (a total of 65 companies were awarded in this sector).
- **Feex: 4th** place in Technology and Computing (a total of 17 companies were awarded in this sector).



- **RA1000 certification** (maximum reputation) by *Reclame Aqui*.
- **Four-time championship in the Reclame Aqui award** (the most important award for customer service and reputation in Brazil).



- **RA1000 seal by *Reclame Aqui*.**



- **Recognition as a TOP Emerging Partner by Imperva.**



- **Acknowledgement as an iFood Super Integrator in 2024.**

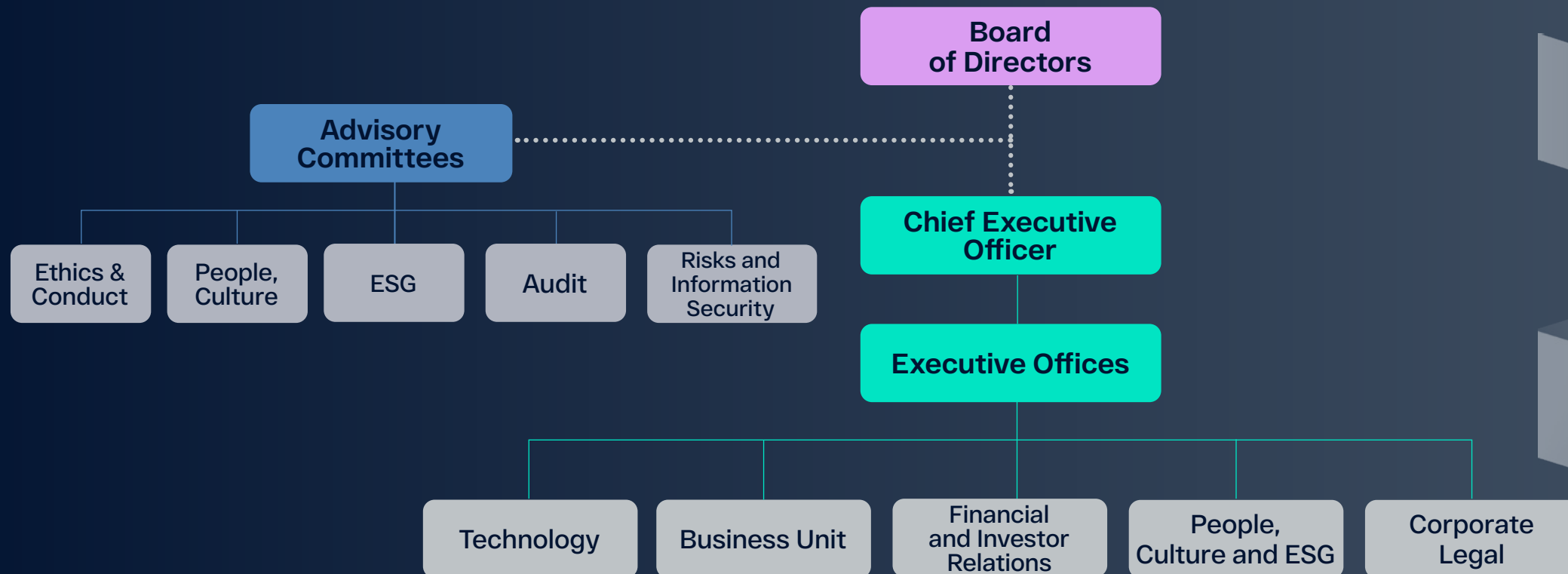


GOVERNANCE

Governance structure

GRI 3-3 Material topic: Corporate governance and compliance

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



Board of Directors

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

The Company's highest governance body, the Board of Directors is our statutory joint decision-making body. It is responsible for defining business policies – including long-term strategies –, overseeing the Executive Board's operation, and assessing and guiding due diligence to identify and manage risks and opportunities, including those related to ESG pillars.

The Board of Directors currently comprises eight members elected at the Annual Shareholders' Meeting (ASM), for a unified two-year term of office, and reelection is permitted. The Board meets quarterly and, extraordinarily, whenever necessary.



Ricardo Gora

Gender
Man.

Executive or non-executive member

Chairman of the Board of Directors.

Independence
No.

Tenure
Until the 2027 ASM.

Number of other positions and commitments held by the member and the nature of the commitments
Chairman of the Board of Directors.



Gilberto Mautner

Gender
Man.

Executive or non-executive member

Vice Chairman of the Board of Directors.

Independence
No.

Tenure
Until the 2027 ASM.

Number of other positions and commitments held by the member and the nature of the commitments
Vice Chairman of the Board of Directors, member of the ESG Committee, the Human Resources Committee and the Information Security Committee.



Claudio Gora

Gender
Man.

Executive or non-executive member

Sitting member of the Board of Directors.

Independence
No.

Tenure
Until the 2027 ASM.

Number of other positions and commitments held by the member and the nature of the commitments
Sitting member of the Board of Directors.



Andrea Gora Cohen

Gender
Woman.

Executive or non-executive member

Sitting member of the Board of Directors.

Independence
No.

Tenure
Until the 2027 ASM.

Number of other positions and commitments held by the member and the nature of the commitments
Sitting member of the Board of Directors and member of the ESG Committee and the Human Resources Committee.



Fernando Biancardi Cirne

Gender

Man.

Executive or non-executive member

Sitting member of the Board of Directors.

Independence

No.

Tenure

Until the 2027 ASM.

Number of other positions and commitments held by the member and the nature of the commitments

Sitting member of the Board of Directors and member of the ESG Committee, the Human Resources Committee and the Ethics and Conduct Committee.



Flávio Benício Jansen Ferreira

Gender

Man.

Executive or non-executive member

Independent member of the Board of Directors.

Independence

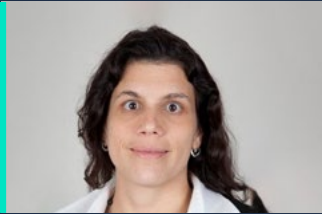
Yes.

Tenure

Until the 2027 ASM.

Number of other positions and commitments held by the member and the nature of the commitments

Independent member of the Board of Directors and member of the ESG Committee, the Human Resources Committee and the Non-statutory Audit Committee.



Manuela Vaz Artigas

Gender

Woman.

Executive or non-executive member

Independent member of the Board of Directors.

Independence

Yes.

Tenure

Until the 2027 ASM.

Number of other positions and commitments held by the member and the nature of the commitments

Independent member of the Board of Directors and member of the ESG Committee and the Human Resources Committee.



Luiz Otavio Ribeiro

Gender

Man.

Executive or non-executive member

Independent member of the Board of Directors.

Independence

Yes.

Tenure

Until the 2027 ASM.

Number of other positions and commitments held by the member and the nature of the commitments

Independent member of the Board of Directors.

The duties and commitments of each board member are described in the [Reference Form](#).

To support its operations and assist in monitoring internal controls and risk management, the Board of Directors relies on five non-statutory advisory committees: the ESG Committee; Human Resources Committee; Audit Committee; Ethics and Conduct Committee; and Information Security Committee. They will be described further in this report.

According to the Novo Mercado regulations, at least two 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. Currently, 37.5% of the Board of Directors' members are independent (three out of eight members). In 2024, we elected the first woman as an independent director. Since 2007, the decisions of the Board of

Directors have been made by consensus, demonstrating respect and an open dialogue on the part of the controlling shareholders and the independent directors.

The Board of Directors Chairman is one of LWSA's controlling shareholders; therefore, he is not an independent chair (the Company does not have an independent leader) and does not hold any other position within 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, as appointed by the Chairman.

All the Board of Directors members have skills related to the Company's material topics, which has added value in managing risks and identifying opportunities on these agendas. The members of the Board of Directors are not Executive Officers, but they serve on the Advisory Committees.

37.5%
of the Board of
Directors' members
are independent.

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





Nomination and selection

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

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). All nominations for eligible positions must comply with the Member Nomination Policy, the Bylaws, the Code of Ethics and Conduct and the Novo Mercado Regulations, as well as the applicable legislation and regulations in force.

As an overall guideline, nominations should be based on an analysis of the needs of the Board of Directors, the Executive Board and the advisory committees, as applicable, ensuring that the bodies are composed of members of diversified profiles, taking into account experience, skills, conduct, background, age and gender.

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 of the Code of Ethics and Conduct, as well

as the other applicable codes, policies and regulations; (iii) adequately assuming the role and responsibilities arising from their position.

Knowledge of the best corporate governance, corporate legislation, regulation and risk management practices is 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 businesses.

For the purpose of meeting the "independence" criterion set out in the Novo Mercado Regulations, independent directors may not be elected if they: (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, a member of management or a member of management of the controlling shareholder; or (iv) have been an employee or Executive Officer of the Company or its controlling shareholder in the previous three years.

Board of Director's performance assessment

GRI 2-18

The performance of the Board of Directors and Committees is reviewed annually by the Executive Board and all board members, including independent directors, according to LWSA's Bylaws.

The performance of the Board of Directors and Committees is reviewed annually by the Executive Board and all board members, including independent directors, according to LWSA's Bylaws.

This process includes the assessment of participation in the analysis and discussion of matters; active contribution to the decision-making process; and commitment to fulfilling their duties, as well as our values and goals. The consolidated review results are presented according to the following criteria:

- Individual results are presented to each board member and the chair;

- Results of the Chair of the Board of Directors and the CEO reviews are also made available to all directors; and
- Each individual result and that of the Chair are discussed in individual feedback meetings.

For senior management, we have developed on the Succession Pipeline, an assessment model based on the 9box method, which includes performance data and potential for more complex challenges. This process aims to guarantee the continuity and sustainability of the business; since, by mapping successors, the Company can rely on leaders prepared to take

on strategic positions in unexpected or planned situations. This approach reduces operational risks, strengthens the organizational culture and promotes long-term sustainability, enabling us to face market changes and challenges with agility and efficiency.

As regards measures taken in response to the assessments, including changes in the composition of the highest governance body and in organizational practices, the Board Chair provides feedback to set the next steps.

Succession Pipeline:
aims to ensure business
continuity and sustainability.

**The Pipeline
reduces risks**
and strengthens the
organizational culture.

Elected positions

Our Company does not have a Nomination Committee; however, we rely on a Nomination Policy for Members of the Board of Directors, Executive Board and Advisory Committees, duly approved by the Board of Directors, applicable to our Company and subsidiaries.

Our Nomination Policy, which follows the best corporate governance practices, sets guidelines, criteria and procedures for the selection of candidates for elected positions. 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.

The selection process looks for candidates with knowledge and experience in the business sectors in which we operate or will operate.

Nomination requirements include that 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.

Impact management

GRI 2-12

The Board of Directors is responsible, among other duties, for overseeing and guiding due diligence and other relevant processes to identify, assess and manage risks and opportunities. This includes:

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

We have an open channel to listen to our employees, in which all reports are treated confidentially and investigated by analyzing the facts/data. At the end of the investigation, if any irregularities are identified, they are submitted to the Ethics and Conduct Committee, which decides on the appropriate measures, including feedback, warning or termination of the person involved.

In 2024, 33 reports of crucial concerns were submitted to the Board of Directors, all referring to behavioral issues, for the entire LWSA ecosystem. None of them concerned fraud or misconduct by partners or members of management. (GRI 2-16)

In 2024, 33 reports of crucial concerns were submitted to the Board of Directors, all referring to behavioral issues, for the entire LWSA ecosystem. None of them concerned fraud or misconduct by partners or members of management.

Dissemination of good ESG practices

GRI 2-12

We seek to integrate best ESG practices into our business agenda and at all Company levels. The Board of Directors has been an important agent in defining strategic guidelines and validating our business plan. We consider to be strategic the search for renewable energy sources, the maintenance of best governance practices and the training of skilled labor, and the fostering the development of Brazilian micro and small businesses through technology. The Board plays an essential role in building the ESG, sustainability and risk management strategy. It is an active agenda that engages many people.

In 2024, we devoted our efforts to updating all of LWSA's internal policies, elected a woman as an independent director for the first time and strengthened the work of the Human Resources and ESG committees, not only because of the relevance of their respective topics but mainly because of the strong role they both play in the Company.

We are deeply mindful of governance. People are at the center of our focus – employees, customers, suppliers, investors, the community etc. We work to promote values such as diversity and the development of a more welcoming and inclusive

environment. We hold training sessions for the entire Organization on the Sustainability Report to share the results obtained and raise awareness of our progress on the ESG front. Our success and intangible value is achieved through the hard work and dedication of skilled trained professionals, who ensure that our Company stands out.

LWSA's biggest challenge is to have and maintain an integrated corporate culture for the entire ecosystem, reflected in the different business units. Looking ahead to the next few years, our focus will be on developing and strengthening the organizational culture as a whole – which involves symbolism, leadership, encouragement and strategy.

As a publicly traded Company, we closely follow B3's governance rules, and, in 2024, we conducted the CEO's succession planning very seamlessly, carrying out the entire transition process in a very structured manner.

In 2024,
we devoted our efforts to
updating all of LWSA's
internal policies.

The Board
plays an essential
role in building the ESG.



Fiscal Council

The Company's Fiscal Council is a non-permanent, independent body that monitors Senior Management and reports to the shareholders. It must be installed by the decision of the Annual Shareholders' Meeting, with a minimum of 2% of the votes requesting its installation.

It was last in place until April 2023, and it was not installed for the fiscal year ended December 31, 2024.

Advisory committees

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

Ethics and Conduct Committee

GRI 2-9

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

It is a representative and multi-sector working group currently comprised of two members that convene on demand, with the participation of the Company's Executive Officers. Members are elected by the Board of Directors for a unified two-year term of office, and re-election is permitted.

Otavio Dantas de Carvalho

Gender

Man.

Executive or non-executive position

Committee member.

Independence

No.

Rafael Chamas Alves

Gender

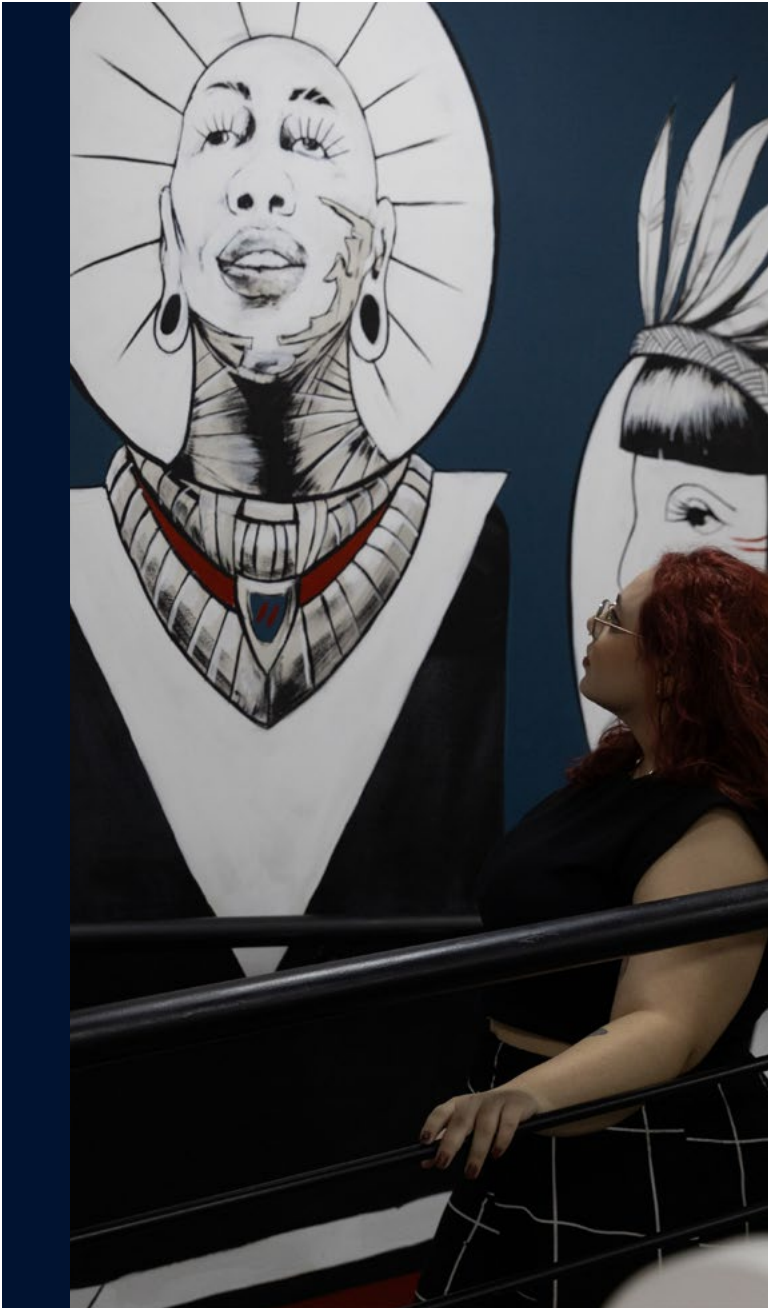
Man.

Executive or non-executive position

Committee member.

Independence

No.



Human Resources Committee

GRI 2-9

In 2024, the Human Resources Committee was reorga-
nized into two new structures: the HR Committee and
the ESG Committee, given the importance of these areas
for the Company’s strategy and development. Although
these committees have practically the same composi-
tion, their agendas are addressed separately.

The Human Resources (HR) Committee is made up of six
members and currently includes Executive Officers and
members of the Company’s Board of Directors, two of
whom are independent. With meetings every 45 days,
it is a working group that constantly seeks efficiency in
human resources, focused on people management and
development, talent attraction and retention and the
Company’s compensation structure.



<div>Gilberto Mautner</div> <div>Gender Man.</div> <div>Executive or non-executive position Committee member.</div> <div>Independence No.</div>	<div>Fernando Biancardi Cirne</div> <div>Gender Man.</div> <div>Executive or non-executive position Committee member.</div> <div>Independence No.</div>	<div>Andrea Gora Cohen</div> <div>Gender Woman.</div> <div>Executive or non-executive position Committee member.</div> <div>Independence No.</div>
<div>Flavio Benício Jansen Ferreira</div> <div>Gender Man.</div> <div>Executive or non-executive position Committee member.</div> <div>Independence Yes.</div>	<div>Manuela Vaz Artigas</div> <div>Gender Woman.</div> <div>Executive or non-executive position Committee member.</div> <div>Independence Yes.</div>	<div>Otavio Dantas de Carvalho</div> <div>Gender Man.</div> <div>Executive or non-executive position Committee member.</div> <div>Independence No.</div>

We do not have an Independent Compensation Committee in our structure. Among other duties, the Human Resources Committee is responsible for helping to discuss and develop the Company's compensation guidelines.

ESG Committee

GRI 2-9

The ESG Committee was created in 2024 and represents a significant achievement for our Company, given the importance of this topic. It plays a strategic role in discussions and actions regarding ESG at LWSA and is made up of seven members, currently including Executive Officers and members of the Board of Directors.

Gilberto Mautner

Gender

Man.

Executive or non-executive position

Committee member.

Independence

No.

Fernando Biancardi Cirne

Gender

Man.

Executive or non-executive position

Committee member.

Independence

No.

Andrea Gora Cohen

Gender

Woman.

Executive or non-executive position

Committee member.

Independence

No.

Flavio Benício Jansen Ferreira

Gender

Man.

Executive or non-executive position

Committee member.

Independence

Yes.

Otávio Dantas de Carvalho

Gender

Man.

Executive or non-executive position

Committee member.

Independence

No.

Henrique Bastos Marquezi Filho

Gender

Man.

Executive or non-executive position

Committee member.

Independence

No.

Manuela Vaz Artigas

Gender

Woman.

Executive or non-executive position

Committee member.

Independence

Yes.

It meets monthly, together with the Company's HR Committee, but with different agendas.

Audit Committee

GRI 2-9

The Audit Committee is responsible for continuously and systematically supervising LWSA's risk identification procedures 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.

In line with the Novo Mercado Regulations, the Audit Committee has its specific internal rules, which detail its functions and operational proceedings. 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.

According to its Internal Regulations, the Audit Committee is made up of three members, elected by the Board of Directors for a unified term of two years, and may be re-elected. The Committee currently has two independent members and one member with recognized experience and in-depth knowledge of corporate accounting.

**Carlos Elder Maciel
de Aquino**

Gender
Man.

**Executive or non-
executive position**

Coordinator of the Audit
Committee

Independence
Yes.

Flavio Benício Jansen Ferreira

Gender
Man.

**Executive or non-
executive position**

Member of the Non-
Statutory Audit Committee

Independence
Yes.

Fernando Dal-Ri Murcia

Gender
Man.

**Executive or non-
executive position**

Member of the Non-
Statutory Audit Committee

Independence
Yes.



Information Security Committee

GRI 2-9

The Information Security Committee implements continuous actions to ensure compliance with and the effective operation of processes related to Technology and Information Security. It meets quarterly and is composed of four members elected by the Board of Directors for a unified term of office of up to two years, re-election being permitted. Executive officers and members of the Board of Directors, in addition to LWSA's key technical leaders, currently participate in the Committee.

Rafael Abdo

Gender

Man.

Executive or non-executive position

Coordinator of the Information Security Committee.

Independence

No.

Gilberto Mautner

Gender

Man.

Executive or non-executive position

Committee member.

Independence

No.

Gustavo Gomes Salviano

Gender

Man.

Executive or non-executive position

Committee member.

Independence

No.

Higor de Araújo Franco

Gender

Man.

Executive or non-executive position

Committee member.

Independence

No.

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

The Committee also promotes the internal controls structure that enables the understanding of the main risks arising from internal and external factors, in order to ensure that they are efficiently identified, assessed, monitored, con-

trolled and tested. It is also 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.



Executive Board

Our Executive Board is currently made up of nine members, elected by the Company's Board of Directors for a unified two-year term of office, who act in accordance with the duties set out in the Bylaws and re-election is permitted. The Executive Board meets whenever company business requires and is not considered a collegiate body.

The Executive Board can be made up of a minimum of five and a maximum of twelve members, who can be appointed as the CEO, Chief Financial Officer, Investor Relations Officer, Technology Officer, People and Corporate Management Officer, Business Development Officer, Marketing Officer, Corporate Legal Officer and up to four Business Unit officers.

In 2024, we prepared the succession plan for LWSA's CEO, with the appointment actually taking place in February 2025. We also created a vertical focused on SMEs, under the responsibility of two managers, Technology and Product.

Senior management compensation

GRI 2-19, 2-20

In force since December 2019, our Compensation Policy aims to establish rules and guidelines for managing positions and salaries; set criteria for job transfers; and define responsibilities, procedures and internal deadlines to guarantee internal equity, wage justice and attractiveness, as well as the maintenance and retention of talent.

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 process of developing compensation policies and determining remuneration is not externally supervised. The studies and panels are defined by the compensation team and validated by the People, Culture & ESG VP/Officer. The considerations of stakeholders (including shareholders) related to the topic are discussed at meetings and recorded in the minutes.

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

Total compensation can be composed of the following elements:

Fixed compensation: aimed at recognizing and reflecting the value of the position internally and externally, as well as individual performance, experience, educational background and knowledge of the professional.

Variable compensation (short-term): aimed at rewarding the achievement and surpassing of Company and individual targets, in line with the budget, the Strategic Plan and market conditions.

Variable compensation (long-term): aimed at (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: aimed at offering assistance benefits in line with market practices.

The overall compensation of LWSA's management shall be set by the Shareholders' Meeting, and the Board of Directors is responsible for setting the monthly compensation of its members and the members of the Executive Board.

As for attraction bonuses or recruitment incentive payments, the Hiring Bonus is only applied to executive hires and negotiation takes place on a case-by-case basis, depending on the candidate's challenge and how much they are willing to give up their current job to take on a new challenge. The available budget and potential financial return are also assessed.

Total annual compensation [GRI 2-21](#)

	2022 ^{6 7}	2023	2024 ⁷
Ratio of the compensation of the highest-paid individual to the median individual compensation ^{1 2 3}	N/A	39.9	53.5
Ratio of percentage increase in compensation of the highest-paid individual to median percentage increase of individual compensation ^{4 5 6}	N/A	N/A ⁸	1.34

¹ Individual compensation is the sum of all components of total annual compensation per person, including basic salaries, variable compensation, bonuses, commissions and profit-sharing programs as well as stock and stock option programs.

² Median is the 50th percentile of the data set sorted – individual compensation.

³ Calculation rationale: highest individual compensation divided by the median of individual compensation.

⁴ The percentage increase is obtained by the ratio of individual compensation in a given year to the immediately preceding year. It is applicable to the highest-paid individual and the median of individual compensation.

⁵ Rationale for calculation: ratio of the percentage increase of the highest-paid individual divided by the ratio of the percentage increase in the median individual compensation.

⁶ Historical data not conclusive.

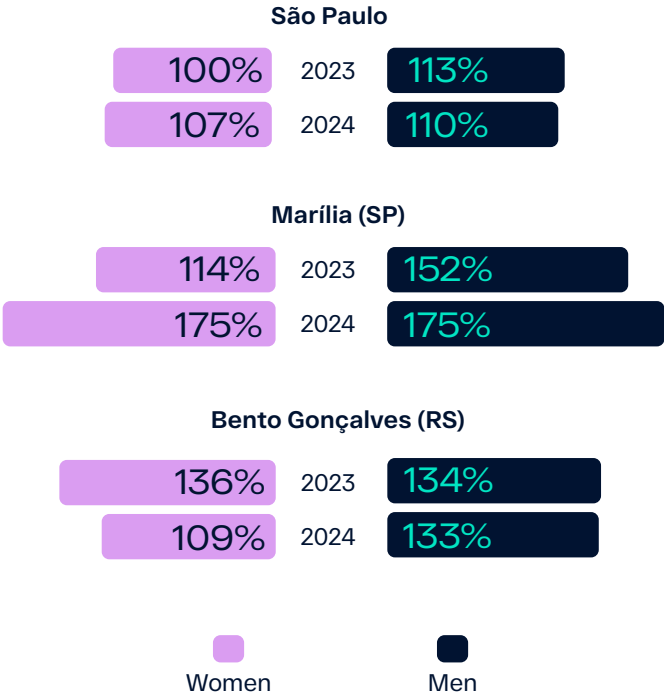
⁷ The Company underwent structural changes due to M&A and mergers between 2022 and 2024.

⁸ Ratio unavailable due to lack of data in 2022.

We do not request the return of bonuses already received. We make payments as established in the Incentives Policy, which can include short- and long-term variable compensation and/or various service incentives. According to agreements defined individually between the executives on the Board, payment can occur proportionally or not at all, depending on each case.

There is no differentiated (private) retirement plan. All employees hired under the Brazilian labor law or as statutory officers follow the social security system and legislation in force.

Ratio of entry-level wage¹, by gender, to the minimum wage² by significant locations of operation³ | [GRI 202-1](#)



Minimum wage ²	2023	2024
São Paulo (SP)	R\$ 1,550.00	R\$ 1,640.00
Marília (SP)	R\$ 1,320.00	R\$ 1,412.00
Bento Gonçalves (RS)	R\$ 1,573.89	R\$ 1,656.52

¹ It considers all employees, except youth apprentices and interns. In cases of reduced working hours, the workload was weighted to enable comparison with the respective minimum wage.

² The minimum wages for each city took into account the regional or federal minimum wages in force each year.

³ The classification takes into account the headquarters of each legal entity, which were grouped by city. Cities with more than 8% of the total workforce were considered significant locations of operation.

Compensation Committee

We do not currently have an independent Compensation Committee in our governance structure. Our compensation guidelines are discussed and drawn up with the support of the Human Resources Committee, which carries out these and other strategic people management functions.

The Board of Directors is responsible for setting 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 compensation portion, including fixed, variable and share-based compensation, and benefits.

In essence, the Board of Directors and the Human Resources Committee participate in the decision-making process on compensation at LWSA.

Executive selection

The executive selection process looks for candidates with knowledge and experience in the business sectors in which we operate or will operate.

Nomination requirements include that 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 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.

Diversity in senior management

GRI 405-1

At LWSA, 36% of leadership positions are held by women, which contributes to a balanced average salary. We are currently redesigning our job and salary structure, which should also help to reduce gaps.

At the moment, there are no women on the Statutory Executive Board. However, there are two women on the Board of Directors, and a female officer was elected at one of our subsidiaries. We also have female representation among non-statutory officers in our structure and that of our subsidiaries.

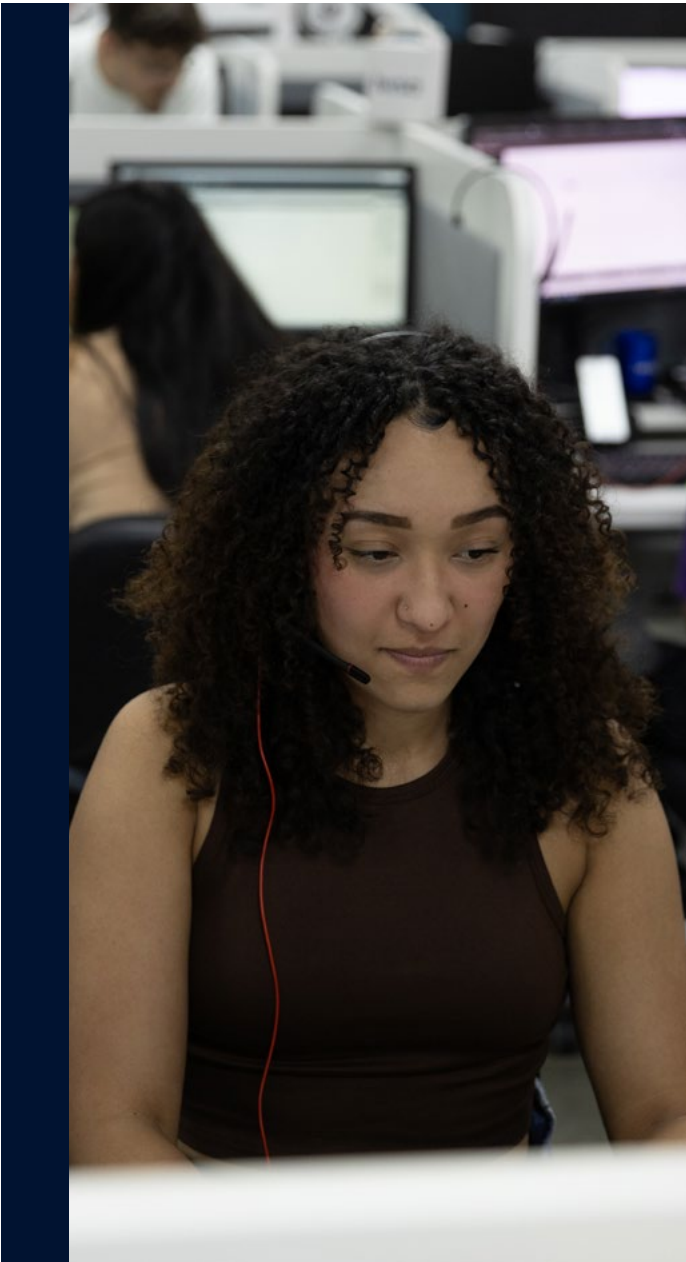
With regard to diversity, there are still no specific criteria established for the election of Board of Directors members. However, the CVM has approved B3's proposal to modify the issuers' regulations to include ESG issues, including diversity. There are also some materials published by B3 that inform the market of some good practices and recommendations on social, governance and environmental issues.

Percentage of individuals within governance bodies, by gender

Gender	2022		2023		2024	
	Total	%	Total	%	Total	%
Men	6	60.0%	6	75.0%	6	75%
Women	4	40.0%	2	25.0%	2	25%
Total	10	100.0%	8	100.0%	8	100.0%

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

Age group	2022		2023		2024	
	Total	%	Total	%	Total	%
Under 30 years old	0	0.0%	0	0.0%	0	0.0%
30 - 50 years old	3	30.0%	3	37.5%	3	37.5%
Over 50 years old	7	70.0%	5	62.5%	5	62.5%
Total	10	100.0%	8	100.0%	8	100.0%





Ethics and integrity

GRI 3-3 Material topic: Corporate governance and compliance

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

Throughout 2024, we reviewed and updated all of our internal policies, which was an essential move for consolidating our ecosystem and strengthening the synergy we seek between the companies that make up our ecosystem. These policies establish clear guidelines to be followed by employees or contractors and apply to all of the Company's units.

Policies are applicable to all LWSA companies and guide our operation, which is structured around non-negotiable political commitments to ensure the protection of human rights, freedom of association, the rights of children and adolescents and diversity, as well as combating corruption and any form of discrimination and prejudice. We ensure that our policies fully guarantee social responsibility, including in our business units.

These commitments are based on:

The Universal Declaration of Human Rights:

adopted by the United Nations General Assembly in 1948, this declaration establishes the fundamental and universal rights of all human beings, including civil, political, economic, social and cultural rights.

The UN Global Compact:

since December 2021, we have been a signatory to this UN initiative, which commits companies to adopting universal principles in areas such as human rights, labor, the environment and the fight against corruption.

Therefore, we are committed to integrating universal principles related to human rights, labor, the environment and anti-corruption into our strategies and operations, to promote responsible and sustainable business practices.

Approved by the Board of Directors, our policies are accessible to employees, customers, suppliers and partners. They are regularly updated and, when necessary, benchmark studies are prepared or third-party companies are hired to guide us on best practices.

We have a ([Code of Ethics and Conduct](#)) and a Related-Party Transaction and Conflicts of Interest Policy designed to guide behavior and conduct to meet legal requirements and strengthen the principles of transparency, loyalty and reputation of LWSA's management and employees. These policies ensure that decisions involving transactions with related parties and situations with potential conflicts of interest are made with total trans-

The Code of Ethics and Conduct and the Related-Party Transaction and Conflicts of Interest Policy ensure that decisions are made transparently and with a focus on our interests.

parency and always with a focus on our interests, as well as those of our subsidiaries and shareholders. The aim is to prevent any decision from being made with the intention of granting private benefits to management, employees, related people or entities.

For this reason, executives, management and Executive Officers have a duty of diligence and must account for their actions in a clear, concise, comprehensible and timely manner, taking full responsibility for the consequences of their actions 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 and Conduct Committee, and is prevented from proceeding with and mediating the transaction in question.

The members of the Board of Directors also act as members of the Company's several committees. Nominations to these committees are approved at a meeting of the Board of Directors and communicated to the

market, and they can be consulted on LWSA's investor relations website.

According to the Related-Party Transaction and Conflicts of Interest Policy, members of management make a declaration of conflicts of interest when they are hired and it must be renewed annually. Cases identified as posing a potential risk to LWSA are referred to a higher-level decision and may be decided by the Ethics and Conduct Committee. For 2025, monitoring will be set up to follow up cases on a regular basis.

All our policies have been approved by the Organization's highest level of governance, as available on our investor relations portal at: <https://ri.lwsa.tech/en/corporate-governance/bylaws-policies-codes-and-charters/>.

Audits on ethical standards

In 2024, we achieved very satisfactory audit results, demonstrating significant progress in our internal controls, stemming from investments in developing systems to improve our level of reconciliation.

The multiple layers of auditing applied to our activities contribute to fighting unethical conduct by ensuring adherence to best practices. In addition to having the Audit Committee (read more in Advisory Committees), we carry out an annual internal audit with Magalhães Andrade and quarterly external audits with KPMG. The work is supported by ethical standards, such as the Code of Ethics and Conduct and the Whistleblowing Channel, for investigating reports of misconduct and/or non-compliance with internal policies.

The internal audit aims to ensure that internal processes adhere to the Company's policies and guidelines, while the external audit aims to ensure that the Financial Statements comply with the accounting standards adopted in Brazil (BR GAAP) as well as international practices (IFRS).

Relations with the government and regulatory bodies

It is important to note that, in 2024, one of the companies in our ecosystem, Pagcerto, received authorization to operate as a Payment Institution (IP, in Portuguese) from the Central Bank of Brazil, enabling it to offer the Digital Account product. Once authorized, the company must comply with new regulatory requirements and obligations to the Regulator. Throughout the year, many processes were restructured, tools were acquired and new governance forums were created.

We have a Risk Management, Compliance and Internal Controls department, which centralizes governance and provides support for issues related to regulatory bodies, being independent within the Company. The department remains alert to all rules applicable to the Organization, disseminating and ensuring their adherence, identifying risks and monitoring any non-compliances until risks are definitively mitigated. It is also responsible for reporting to executive and senior management forums.



Code of Ethics and Conduct

Our Company has a Code of Ethics and Conduct that guides our positioning on the most frequent issues; however, it is not intended to cover all conduct and integrity practices and principles that we expect. We expect relationships in the workplace to be guided by honesty, respect, collaboration and teamwork among all employees, regardless of their hierarchical level.

The Code of Ethics and Conduct is available on the [website](#). The document covers principles, conduct commitments, ethics and whistleblowing management, commitment to ESG, relationships, information security, use of resources and preservation of assets. Upon joining the Company, employees receive a link to the Code, which they can read and then take an assessment on.

As a way of guaranteeing adherence to the Program, employees must obtain a minimum score of 80% of correct answers to pass. For the units' business partners and suppliers, there is a standard clause accepting the Group's Code of Ethics and Conduct in their contracts.

LWSA does not tolerate any kind of retaliation, reproach or discrimination against people who aim to ensure compliance with the Code of Ethics and Conduct. Employees must report any violation or suspected violation of the Code to the Ethics and Conduct Committee.

At LWSA, we adopt talent management policies and practices focused on the continuous development and retention of our employees, with the aim of creating an attractive, engaging work environment that promotes professional growth.



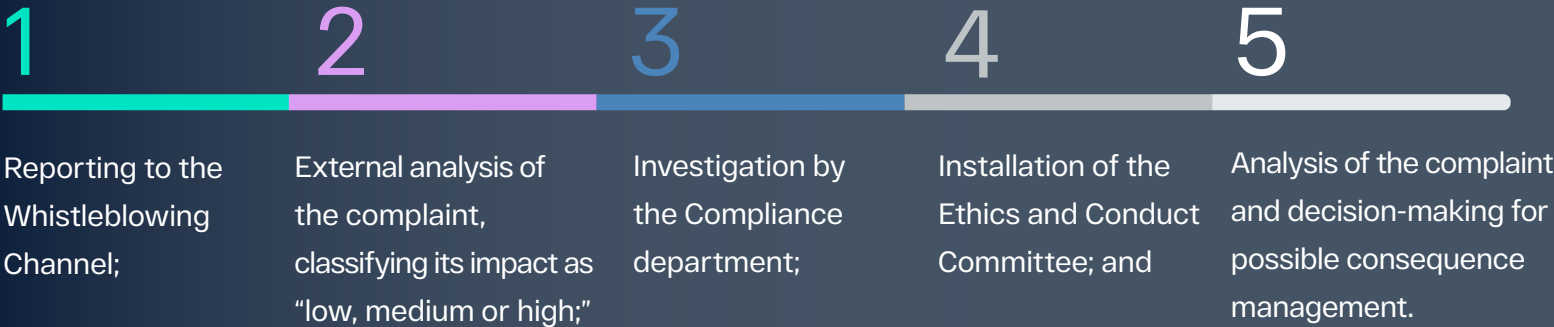
Whistleblowing channel

In the event of non-compliance with the guidelines set out in the Code of Ethics and Conduct, employees have at their disposal the Whistleblowing Channel, where misconduct can be reported, preserving the anonymity of the source. The service, which is outsourced, is also available to customers and partners.

LWSA's Whistleblowing Channel:

Telephone: 08005913128
Website: <http://canalconfidencial.com.br/lwsa/>

At LWSA, we respect the following workflow for handling complaints:





All complaints are received and handled confidentially by Aliant, a hired company, and forwarded to the Compliance department, which investigates and analyzes the case. All cases are submitted to the Ethics Committee for discussion and, if misconduct is proven, a disciplinary measure is set: informal or formal feedback, warning or simple termination or termination with cause, depending on the seriousness of the misconduct. Whistleblowers may remain anonymous. We do not tolerate retaliation, reproaches or discrimination against people who ensure compliance with our Code.

35 complaints,

Were received in 2024, all of which were resolved in the same year. None of these complaints involved senior management or issues related to financial or accounting fraud.

All complaints are received and handled confidentially by Aliant, a hired company, and forwarded to the Compliance department, which investigates and analyzes the case.

All employees receive information on the Whistleblowing Channel upon hire and during refresher training on the Code of Ethics and Conduct, which is followed by an evaluation. The topic is reinforced in conversation circles on I&D, as well as in communications from the Compliance area broadcast throughout the Company. It is also mentioned in all contracts signed by LWSA.

Reports of fraud, of accounting or tax issues or those involving senior management are managed through a special workflow, involving the CEO and/or the Board of Directors, depending on the position of the accused in the Company. Such cases should be analyzed by the Audit Committee.

Tax control and transparency

We adopt strict control practices to ensure tax compliance and rigorous fulfillment of tax obligations (both main and ancillary) in all jurisdictions where we operate. The correct calculation and payment of taxes due are priorities in our operations, reflecting our commitment to integrity and legality.

Our tax management 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 con-

duct of all employees is in line with ethical and legal principles.

Tax liabilities are managed with a focus on the correct application of tax legislation, with the support of specialized firms and regular monitoring by the Audit Committee, given the complexity of the Bra-

zilian tax environment. 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.

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



Risk management

GRI 205-2

The Risk Management, Compliance and Internal Controls areas were consolidated in 2024, aimed at applying a new Risk Management methodology for all LWSA's companies.

LWSA adheres to the best market practices and establishes, through the Internal Controls Policy, guidelines and responsibilities that must be met to strengthen its internal controls environment, with definitions for risk prevention, detection and mitigation.

All employees are responsible for managing and reducing risks, and for maintaining LWSA's controls. The Board of Directors and the Internal Controls and Compliance department are responsible for fostering this culture, advising other teams on how to identify, mitigate and monitor risks, and suggesting, as applicable, the appropriate control levels.

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. The risk management and internal controls framework establishes foundational principles to guarantee a standardized approach for the second line of defense. The methodology used is aligned with the internal control framework proposed by the Committee of Sponsoring of Organizations of the Treadway Commission (COSO). COSO's recommendations, and compliance with these recommendations, are widely practiced and considered as a model and reference not only in Brazil, but in most countries worldwide.

To achieve our risk management goals, we consider these four categories:

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

The four components for achieving our goals are:

INTERNAL ENVIRONMENT:

Culture, and its impact on risk awareness, forms the foundation for all other components of corporate risk management. It influences the design and functioning of control activities, information and communication systems, as well as monitoring activities.

SETTING GOALS:

Established at the strategic level for operational, communication and compliance targets, required for identifying events and assessing risks and responses.

IDENTIFYING EVENTS:

Incidents or events from internal or external sources that impact how the Company's strategy is implemented or how goals are achieved.

ASSESSING RISKS:

A dynamic and interactive process for identifying and assessing risk tolerance that directly influences the Company's ability to achieve its goals.

Risk assessment

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

Liquidity:

Honoring financial obligations.

Strategic:

Related to the Company's strategic guidelines.

Operational:

Failures in processes, systems or people.

Compliance:

Adhering to regulations and standards.

Financial:

Financial impact on the Company.

Reputation:

Damage to the Company's image.

Information security:

Protecting data and information.

- **Risk response:** includes avoiding, reducing, sharing, or accepting risks. When considering the response itself, the Company's management assesses how it affects probability, what are its impacts, and what are the costs and benefits;
- **Control activities:** preventive and detective actions, including several manual and automatic activities such as authorizations for approvals, verifications, reconciliations and reviewing business performance;
- **Information and communication:** a continuous and interactive process of providing, sharing and obtaining important and quality information from internal and external sources to support how internal controls are functioning;
- **Monitoring activities:** continuous and independent assessments to ensure each of the five internal control components are included and functioning.

The methodology's steps represent the inherent cycle within risk management and internal control, namely:

- **Identifying:** identifies the risks inherent in the Company's processes;
- **Prioritizing:** assesses the exposure of the identified risks and sets priority actions;
- **Responding:** defines responses to risks, according to the Company's risk appetite;
- **Monitoring:** continuously monitors the control environment; and
- **Reporting:** maintains executive officers informed about risks and the control environment.

Corruption risk

GRI 205-2

In 2024, we established our Integrity and Consequence Management Policy, aimed at strengthening ethics principles, supporting the Whistleblowing Channel and defining standards for managing consequences. We also established our Anti-Money Laundering, Counterterrorism Financing, and Weapons Proliferation Prevention Policy, which defined the minimum assumptions for each sectoral program, such as Know Your Customer, Know Your Supplier, Know Your Partner and Know Your Employee. We also simultaneously implemented new procedures.

To avoid exposure to corruption risks, our Code of Conduct and 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. To further reinforce our governance on this matter, we also established the Gifts and Donations Policy. These documents are available to all employees, business partners and suppliers.

In 2024, all of the members of our governance bodies and employees were informed and trained on the Company's Code of Conduct and Ethics, which covers the fight against corruption.

100% of the members
of our governance bodies and employees were
informed and trained on the Company's Code of
Conduct and Ethics, in 2024.



Litigation and compensation for negative impacts

LWSA's legal team has administrative authority to repair legitimate damage caused to customers, thus avoiding unnecessary litigation. All legal and extrajudicial lawsuits arising from customers or third parties are continuously monitored, allowing us to identify recurring situations, implement systemic adjustments or changes to products and processes, as well as repair any damage. Extrajudicial notifications are addressed internally by email to the legal department or handled through a formal request (through the call desk or customer service) in the legal system (Benner).

Legal and administrative lawsuits are received, handled and monitored by LWSA's internal legal team, which is led by a specialized external legal office. We settle agreements to repair damages and expedite legal processing times when we collectively decide that this is the best approach.

We analyze all lawsuits to understand what caused the situation and correct any possible technical errors. The Company's most relevant lawsuits are taken to the Executive Board, Vice Presidency and, eventually, to the CEO. Most of the lawsuits are open to the public.

Other complaints made by stakeholders are identified, analyzed and handled by monitoring our Telephone, Chat and WhatsApp channels, as well as through tickets that have been opened. The volumes of these complaints are identified and tracked in real time, and we carry out a qualitative analysis of what our analysts are handling.

The analysis is done by employees (coordinators, quality and training teams), as well as through GenAI, with the AI reading the services. We analyze the content of the services being provided, satisfaction surveys and material generated by our Quality team, aimed at promoting a continuous improvement process.

To adequately treat and resolve complaints, demands are analyzed by our N1 team. When a resolution is not achieved, these demands are escalated to our N2 team. Our teams, starting from N1, are comprised of professionals with IT background, who also receive internal training, ranging from initial onboarding to advanced and refresher courses.

The effectiveness of our service channels is measured by KPIs, combining our internal perspective with the service satisfaction survey measured by three pillars:

- **Solution:** assesses the presented solution.
- **Speed:** assesses customer waiting time.
- **Relationship:** assesses the professional's demeanor during service.

Our Customer Service team applies the PDCA (Plan, Do, Check and Act) methodology for continuous improvement.

In 2024, LWSA did not have any confirmed cases of corruption involving employees or business partners, and no new lawsuits were filed against the Company or its employees.

We have approximately 440 ongoing lawsuits relating to different matters, which is a small volume considering we had approximately 700,000 active customers and almost 4,000 employees in 2024.

Information security

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

We are very concerned about safety, which is part of our business and DNA, and is one of our key differentiating factors against our peers. We constantly invest in processes and have a successful track record in this area.

We centralize our cybersecurity structure at LWSA so we can standardize measures and processes for an increasingly effective defense of our technological environment against attacks and invasions. This initiative includes expanding our structure and team, aimed at more robust and disciplined efforts to analyze not only security and protection elements against attacks, but also other elements so our architecture and code is constructed in a way that eliminates the risk of having any kind of vulnerability. We operate on many fronts, with specialized professionals who are dedicated to information security.

Information security (IS) is a critical issue and a key 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.

Among the security controls in place, we highlight encryption, multi-factor au-

thentication (MFA), perimeter security and constant monitoring of our technology facilities. We are also certified and independently audited every year, under ISAE 3402 Type II standard, 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 continuity 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.

Our information security governance is structured through multidisciplinary committees, responsible for making strategic decisions that are aligned with recognized best practices, such as ISO 27001 and NIST. By adopting open standards,

such as CIS Controls and OWASP, we ensure interoperability among systems and comply with regulatory requirements. Additionally, we have formal channels for reporting concerns related to information security, in accordance with **GRI 2-26**.

We follow stringent security and business continuity protocols to ensure uninterrupted service availability for both internal and external customers. In 2024, we launched Business Continuity Plan (BCP) project to enhance transparency and provide external assurance of our commitment to our customers and partners. The project is expected to be completed in 2025, covering various aspects of our critical services and directly engaging senior management throughout the process.

Identity management is one of the Company's critical processes to ensure that employees have appropriate access to LWSA's resources.

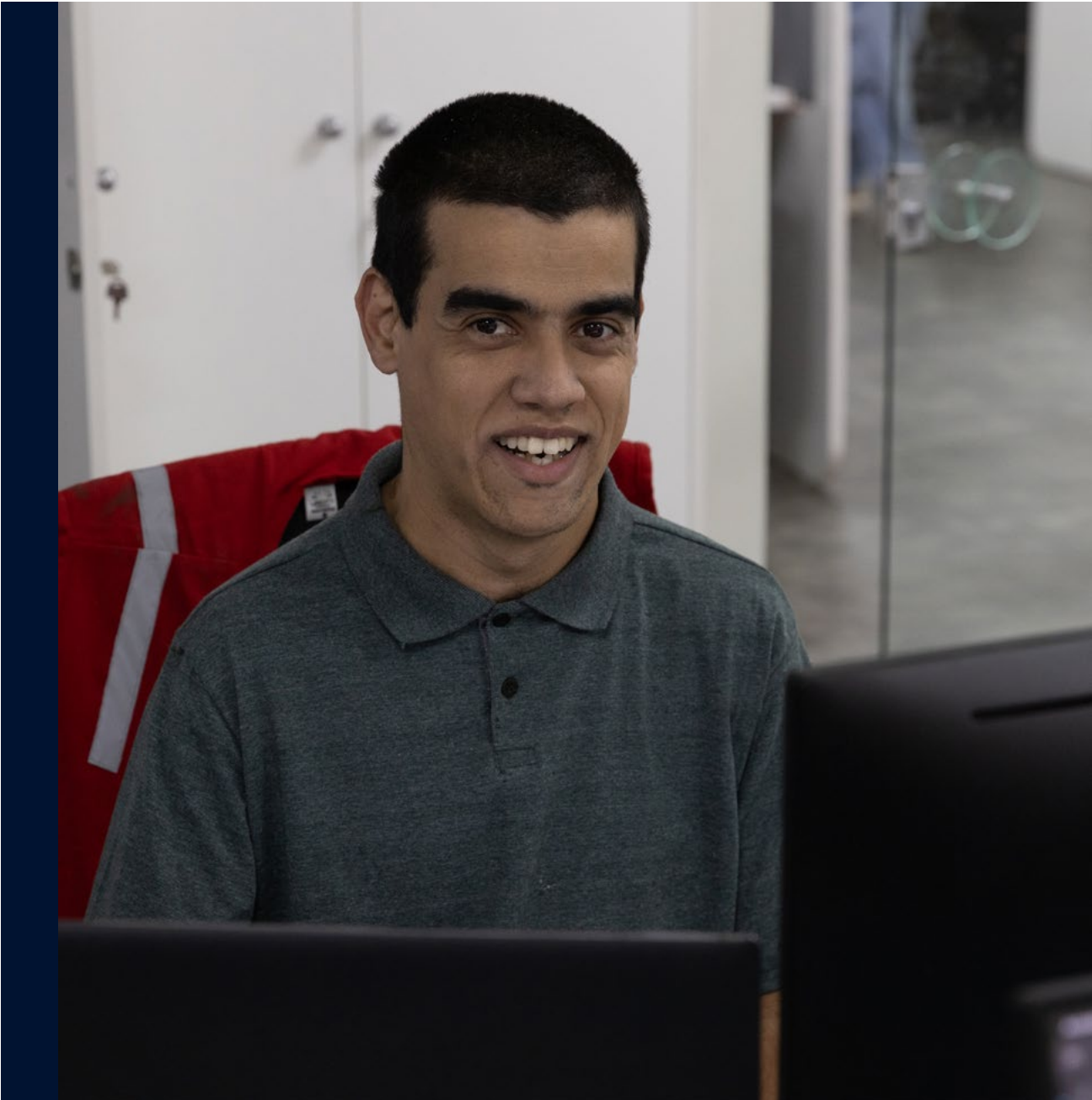
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This entire process is carried out by linking access rights according to the job requirements of each employee. Our control access management includes processes such as requests, authorization, provisioning, cancellation and, most importantly, a periodic review of all access granted to the Company's resources. We follow the "need to know and need to do" principle, meaning that users should only have access to information and resources required for their daily tasks and activities.

The technological structure operates under a robust set of tools that ensure information security at all operational levels. We use Endpoint Detection and Response (EDR) for advanced-level monitoring of threats on endpoints and Mobile De-

vice Management (MDM) for centralized management of mobile devices, ensuring compliance with security policies. We reinforce data protection in cloud environments by implementing Cloud Access Security Broker (CASB), and control against leaks for sensitive data is done through Data Loss Prevention (DLP). Access credentials are stored in password vaults with strong encryption, and web applications are protected against attacks (such as SQL injection and XSS) through the Web Application Firewall (WAF). The Zero Trust Network strategy is applied through microsegmentation, reducing surface attacks. Furthermore, application security is ensured through static (SAST) and dynamic (DAST) testing, ensuring the early detection of vulnerabilities.



Certifications and audits:

- **PCI DSS:** compliance with card data security.
- **ISAE 3402/3000 (SOC Reports):** internal control audit.
- **MSCI (Data Security & Privacy):** assessment of cyber risk exposure.

Complementary programs and good practices:

- Multi-Factor **Authentication** (MFA).
- Continuous **monitoring** (Siem/SOC).
- **Backup** and restore testing.
- **Data encryption** in transit and at rest.
- **Bug Bounty Program:** Rewards for ethically reported vulnerabilities.
- **Vulnerability management:** Prioritization and correction based on frameworks (CVSS, SSVC).
- Privacy **incident indicators** (GRI 418-1).

Security team structure:

- **Defensive security (Blue team):** continuously monitors and responds to incidents.
- **Offensive security (Red team):** simulates attacks to validate controls.
- **Security engineering:** implements secure architecture and automated security.
- **AppSec (Application Security):** reviews static and dynamic codes.
- **Information Security Governance (ISG):** manages policies and compliance, focusing on emerging risks (MSCI: Risk Management).



Data privacy

GRI 418-1

Data protection is treated with the same priority as information security. Our Privacy Policy is duly available on LWSA's website and includes the Data Processing Agreement, aligned with the General Data Protection Law (LGPD, in Portuguese). The document details our practices on collecting, using, storing and sharing data, including measures such as encryption and access control.

To mitigate risks, we conduct Data Protection Impact Assessments (DPIAs) and regular internal audits to identify vulnerabilities and mitigate potential risks. In 2024, two incidents involving personal data were identified and corrected.

We also have a specific channel for reporting privacy incidents: privacidade@locaweb.com.br.

The security of our customers is a matter of utmost importance and daily attention. Among several protective measures in place, we highlight the use of well-established controls that ensure confidence and stability in the services we provide. We rely on robust, market-recognized tools to prevent unauthorized access, data loss, and to support contingency actions. Our infrastructure

includes anti-DDoS systems, firewalls, EDR solutions, active monitoring tools, and a highly trained incident response team prepared to act in a variety of scenarios. This team undergoes regular training and participates in internal testings.

Annual LGPD training is mandatory for all employees, covering topics such as the data holders' rights, legal principles, LGPD principles and managing data incidents.

Third-party service providers undergo strict assessment on compliance with the General Data Protection Law and other applicable legislation, and contractual clauses are established to ensure that share data is protected.

Our Privacy Policy and information on our use of data and cookies, which includes the Data Processing Agreement, is duly available on LWSA's website: <https://lwsa.tech/en/policies/>.

Our Privacy Policy provides details on the types of data we collect, use and share, and establishes the security measures that must be implemented to protect data. This includes,

but is not limited to, encryption and physical security. These documents are limited to LWSA's relationship with its customers. With this, the Company ensures that all data protection practices comply with the LGPD.

We regularly carry out analyses to identify the vulnerabilities that could result in breaches and/or inappropriate use of personal data. Each project involving significant volumes of personal data, classified as sensitive, undergoes a data protection impact assessment (DPIAs) aimed at identifying and mitigating the related risks.

In addition, LWSA operates with advanced threat detection systems that monitor the environment, 24/7, through the (Security Operations Center (SOC) department to detect signs of suspicious activities. Should any breach occur, the incident response team acts immediately to con-

Annual LGPD training
is mandatory for all employees.

tain and eliminate the threat, and initiate the appropriate response process. The e-mail of the communication channel is: privacidade@locaweb.com.br

LWSA has an exclusive team, available 24/7, dedicated to the Incident Management process (data breach) and responsible for resolving incidents related to information security. We periodically conduct internal information security audits through a specific team that assesses if operations are following our internal policies and the established security standards.

The Company is annually audited by an independent firm, which directly contributes to information security and compliance with external regulations.

In terms of data protection laws, the areas mentioned above act quickly and effectively to prevent, mitigate, and correct what is needed and what is impacting our

ecosystem, ensuring internal compliance with these laws.

This path requires us to constantly learn, monitor and improve our processes. We operate with a team of qualified professionals and they are adequately prepared to address challenges and comply with the LGPD. In 2024, we identified two data incidents, which were appropriately addressed and corrected.

Service providers

Personal data is only shared with third-party service providers and LWSA's companies after we have received express consent from data holders or when we are under legal requirement. Therefore, whenever data is shared with third parties, data holders receive confirmation that their data is being treated, ensuring total transparency and compliance with protection standards for personal data.

Employee training on LGPD

Currently, LGPD training is given once a year, and it is mandatory for all LWSA employees and the companies in our ecosystem. This training covers the key focal points of the LGPD, including, but not limited to:

- The purpose of this law;
- Concepts;
- Principles;
- Legal foundations;
- Data holders' rights;
- Managing the processing of personal data;
- Sanctions;
- Good practices.



Certification

LWSA recognizes that certifications play a crucial role in ensuring quality and compliance. We maintain periodic reviews of all controls to ensure we are adhering to the standards required for us to maintain our certifications. The Information Security Governance team monitors and tests these controls, acting as the main point of contact for external audits and responsible for guaranteeing compliance with standards and regulations.

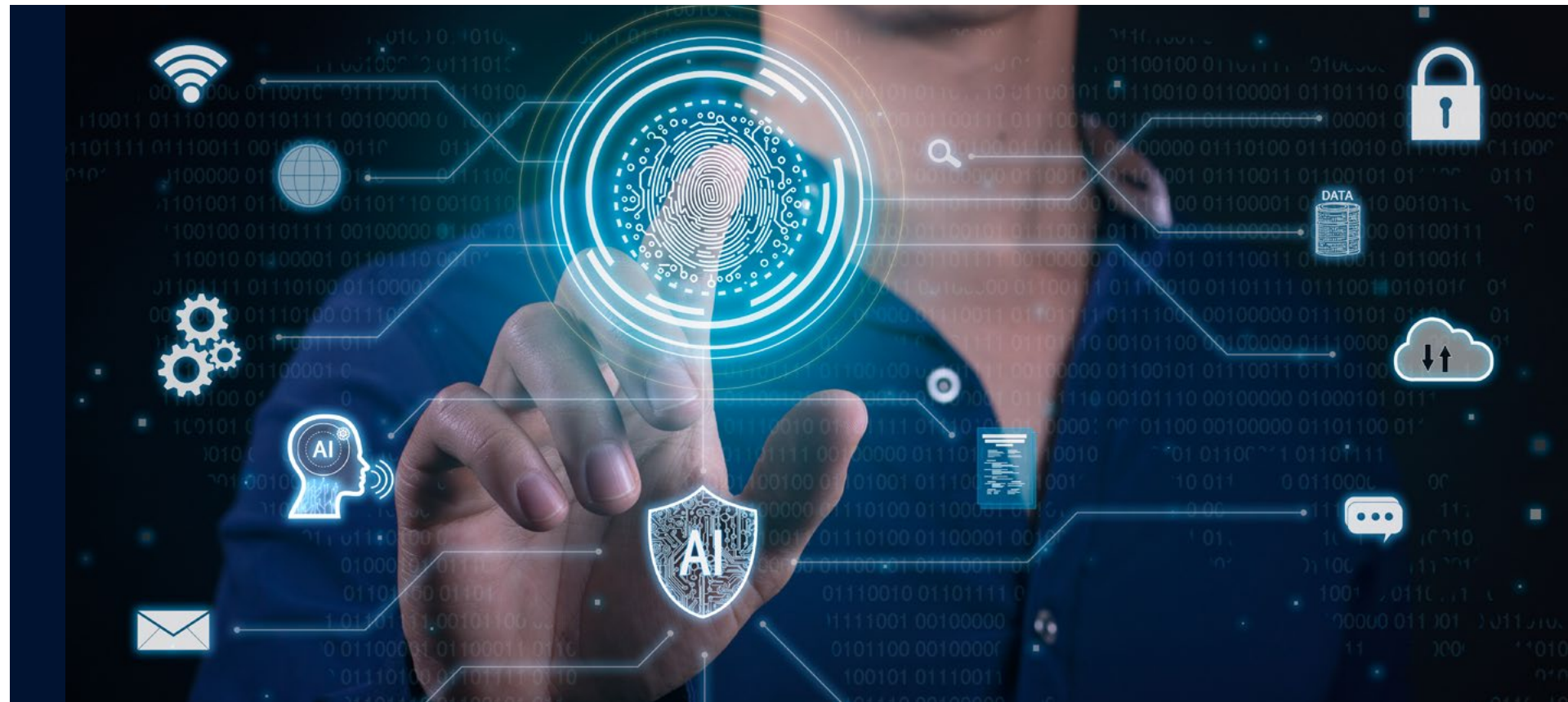
As already mentioned, LWSA currently has the ISAE 3402 (SOC1 Type II) certification for its Data Center environment and the PCI-DSS certification for operations involving card data, all of which are renewed annually by independent audits. In addition, information security controls, processes and guidelines are implemented based on several highly recognized security frameworks, including ISO 27001/02, NIST, CIS, among others.

Artificial intelligence

We have also been educating ourselves in relation to artificial intelligence, not only at the Legal Department, but across LWSA and at an external office, to address regulations and legislation that cover artificial intelligence.

In 2024, Octadesk, one of LWSA's brands, launched an artificial intelligence customer service product named WOZ, which is powered by a specific database.

In 2024,
Octadesk launched
the AI product WOZ for
customer service.





Innovation

GRI 3-3 Material topic: Innovation and technology

At LWSA, we are building an ecosystem that is increasingly connected, collaborative and prepared to scale innovation. In April 2025, we launched our first Software Engineering chapter, an important milestone in this direction. The goal is to create a space that encourages the exchange of ideas among experts from different business units, promoting good practices and reutilizing our existing solutions.

The chapter was established as a technical knowledge hub, where common challenges are discussed

and innovation becomes more accessible to all LWSA's units. In practical terms, this implies gains in scale, greater speed for developing solutions, standardizing technological modules and, above all, a more cohesive ecosystem prepared to deliver even more value to our customers.

The Artificial Intelligence theme is a core discussion, as it should be used safely, efficiently and at a competitive cost to enhance productivity without compromising quality.

The launch of our first Software Engineering chapter was an important step toward building an increasingly connected, collaborative ecosystem that is prepared to scale innovation.

LWSA has hundreds of solutions in its ecosystem and offering them in an integrated way, with technology and enhanced through the chapters, is a very central part of our strategy.

Our work in Research, Development and Innovation (RDI) is aimed at not just meeting market demands 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.

Over the years, we created a responsible and sustainable innovation environment. This journey began with Law 11,196/2005 ('Lei do Bem'), a federal government program in which companies are eligible for significant tax reductions when investing in new RDI projects. By participating in the program, we also contribute with the professional and technical development of our team and align with the social aspects of the ESG agenda.

Below are some of the technologies and practices we developed:



- **Transforming data into decisions:** Bling launched a tool that offers companies a complete and integrated view of their operations, with constantly updated data and interactive dashboards without the need for external tools.
- **AI for customer service:** Octadesk has launched WOZ, which provides quick, contextualized answers and improves our understanding of the customer's situation. Companies can choose their tone of voice for each interaction to humane this customer service experience.
- **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

LWSA's Investor Relations Office is our point of contact with the market and our shareholders, responsible for maintaining the liquidity of our shares at levels in line with those of major market players, as well as for gauging shareholders' perceptions of our strategies and incorporating their suggestions for improvement into the direction of the business.

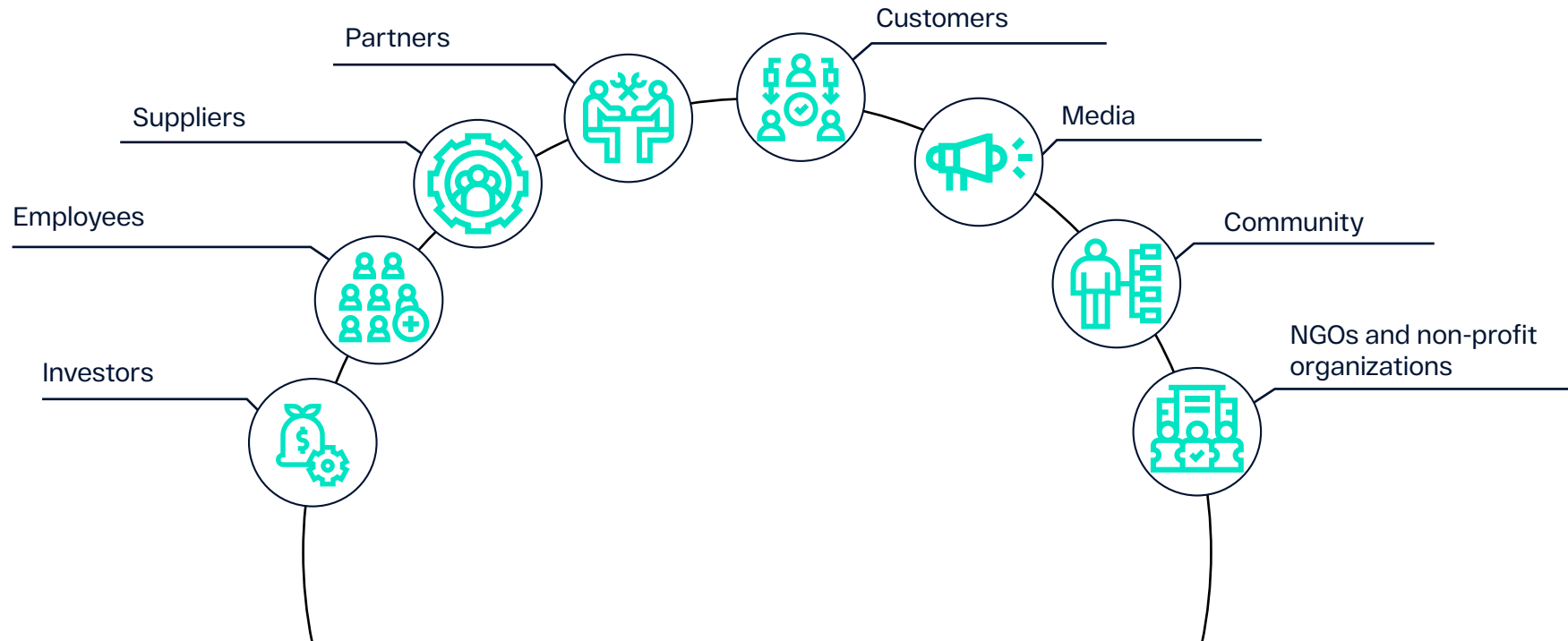
Our IR department engages with investors in three categories:

■ **Individual or corporate shareholders:** shareholders or potential shareholders who buy our shares in the market aiming at achieving financial returns.

■ **Sell-side analysts:** 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:** 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 on the IR website, which hosts all regulatory and complementary information about LWSA. 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 are driven by people. We work for and on behalf of people. We value and seek to improve our relations with all our stakeholder groups, including:

- **Employees:** our interaction is constant and occurs through internal surveys, performance reviews, 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, the second on business strategy and results and the third is targeted at the Company's leadership. We have an internal Instagram profile to foster closer communication with employees. The channel is managed by the endomarketing team.
- **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 headquarters are located next to the Peinha community in São Paulo, and we maintain an active relationship with its leaders, through a WhatsApp group, face-to-face meetings, support at events and recurring meetings organized by the ESG team.



People management

GRI 2-7, 2-8, 3-3 Material topic: Employee journey

In 2024, driven by an ecosystem vision, the People, Culture and ESG structure underwent a relevant and strategic transformation. With the arrival of the new People and Strategy Vice President, we revisited our operating model to foster higher levels of integration and efficiency, focusing more on the entire employee journey.

This initiative unified our seven Human Resources areas into a single structure, based on a matrix model composed of Centers of Excellence (CoEs) and Business Partners (BPs), which began to operate in an integrated way across LWSA. The new organizational structure allowed us to optimize efforts, reduce overlaps, focus on priorities and strengthen the HR department's role as a driver for the Company's strategic plan.

Our Centers of Excellence prioritize the work of specialists, fostering deeper technical

knowledge and more assertive strategies to address LWSA's challenges. Meanwhile, our Business Partners act as a direct link between leaders and the CoEs, focusing on the specific needs of each vertical, promoting a closer relationship with the teams and tailored initiatives.

In addition to this structural change, we also conducted a detailed analysis of the initiatives in the People department, reviewing roles, responsibilities and processes. Based on this assessment, we grouped themes into three categories: those to be maintained, those to be accelerated, and those that are strategic differentiators for LWSA.

As a result, we redesigned several processes in our employee journey, including activities such as onboarding, performance management, talent mapping,

the internal communication strategy and our recognition and incentive programs. These changes were based on active listening, which was achieved through internal surveys, diagnostics and interviews with BPs and leaders. The insights collected helped us develop our action plans, cultural guidelines and a new internal communication matrix.

Currently, LWSA has 3,606 employees across different Brazilian regions under on-site, remote and hybrid work models, with 99% of employees comprising our permanent staff and approximately 1% as temporary professionals.

3,606
employees distributed
across various regions
of Brazil, working in
person, remotely, and
in a hybrid model.

Attraction and retention

When we think about the employee journey, we pay close attention to each stage of their interaction with LWSA. We are mainly focused on attracting and retaining talent while developing our internal audience, striving to achieve the Company's best results with the best people and professionals onboard to strengthen our business.

At LWSA, we adopt talent management policies and practices aimed at the continuous development and retention of our employees, creating an attractive and engaging work environment that promotes professional growth. Aligned with this strategy, in 2025, we will implement a new feature for mapping career interests among different areas, enabling employees to inform their preferences in terms of areas and professional development at the Company, therefore expanding growth and engagement opportunities.

We adopt competitive compensation strategies, which are complemented by attractive benefits and recognition programs aligned with professional development. We also carry out periodic assessments to identify the key factors behind employee turnover, using tools such as exit inter-

views and dashboards to monitor key metrics. Based on this data, we take corrective actions and continuously improve our strategies to address the identified issues, promoting a more attractive work environment that is aligned with our employees' expectations.

At LWSA, we invest in building and maintaining our employer brand through internal actions aimed at retaining, engaging and continuously developing our talents. We also design external actions to promote our corporate values and culture, fostering a collaborative and inclusive work environment, where everyone has the opportunity to grow regardless of differences.

At LWSA, we adopt talent management policies and practices aimed at the continuous development and retention of our employees, creating an attractive and engaging work environment that promotes professional growth.



Our recruitment strategies are carried out across several market channels, including job postings on digital platforms, partnerships with educational institutions and in-person recruitment events, always in a transparent and inclusive way to attract new talents. We also have positive internal practices, such as the employee referral and bonus programs, to attract skilled and diverse talent.

We regularly assess the job market and recruitment trends to adjust our talent attraction and retention strategies, aligning them not only with the best market practices, but also with our corporate view and goals.

In terms of acquiring talent, we also map our future hiring needs to identify the essential skills and abilities required to drive the success of our business. We also develop strategic partnerships with educational institutions, professional or-

ganizations and other important entities to actively attract new pools of talent. These partnerships can include internship programs, joint research projects, participation in academic and professional events, among other initiatives.

Through strategic actions, we demonstrate our commitment to reduce turnover, minimize the loss of intellectual and human capital and strengthen our ability to attract talent, promoting and encouraging an inclusive work environment

aligned with the Company's values. These practices demonstrate the Company's commitment to ESG principles, highlighting its dedication to corporate social responsibility and a relentless pursuit of excellence in its actions and results.



As part of our employer brand strategy for 2025, we began to continuously monitor the reviews posted on the Glassdoor platform and actively respond to all comments across the 12 pages that make up LWSA's ecosystem. This practice reflects our commitment to safeguarding LWSA's reputation as a great place to work.

This active listening practice, in addition to safeguarding our external image, also generates valuable insights into our employees' journey, helping us identify what is working well and what needs improvement. These findings are shared with our strategic areas to guide actions that continuously enhance the experience of those in our ecosystem.

Our score on Glassdoor is currently 4.3 (out of 5) and we are recommended by 91% of our current and former employees, reinforcing the positive perception we have built over time. However, we pay close attention to critical reviews as we know they can impact our image as an employer brand, our ability to attract new talent, and our employee engagement.

Monitoring, responding, and taking actions based on feedback is one of the ways we show we are listening. However, we also care about building an environment that increasingly meets everyone's expectations. This retention, reputation and talent attraction strategy is aimed at strengthening our culture and positioning LWSA as a reference market player.

4.3/5
on Glassdoor.

91%
recommendation rate
from employees and
former employees.



Performance review and feedback processes

In 2024, we implemented the CoE structure, which consists of a Performance Center of Excellence with a team dedicated to driving employee performance through specific practices and methodologies. The CoE's mission is to promote talent interchangeability between business units, maximize our employees' career possibilities and improve LWSA's corporate results.

One of the main performance deliveries of the CoE during this period was the redesign of the Performance Management process, ensuring standardization and governance in our ecosystem. This new model was designed according to internal assessments, benchmarks against reference market players, and LWSA units that had already worked on the theme, resulting in the model that will be applied starting in 2025, focused on guiding the Company's innovation.

We invest in more centralized internal communications and work to ensure that our different channels disseminate the corporate development processes and strategy and provide each employee the opportunity to better understand LWSA and their role in the Company.

We promote a culture of feedback and open dialogue, encouraging employees to express their concerns and suggestions to improve the work environment. We encourage consistent feedback, improvements in Individual Development Plans, and structured feedback sessions to effectively assess the development cycle.

We have a structured Performance Management process, with stages that align professional goals with the Company's strategic goals to guide our decision-making processes and to promote the continuous development of our em-

ployees. Throughout the process, clear and measurable targets are set for each employee, all of which must also be aligned with the Company's strategic goals, thus enabling a solid basis for the Performance Review.

The Performance Review process is applied to all employees on an annual basis and aims to evaluate how they have developed according to the required skills,

based on the complexity of each job position, to ensure LWSA's success.

Leaders are trained to conduct the performance review process in a fair, objective and constructive way. After the evaluations have been concluded, leaders are trained on how to provide quality feedback and receive guidance on how to further develop each employee.



Internship and trainee programs

LWSA's Internship Program, which opens its application process every six months, targets undergraduate students pursuing bachelor's or technological degrees and who are interested in enhancing their academic development by aligning practice and experience with the corporate environment. During a 12-month period, the internship program focuses on developing hard and soft skills, effectively transforming potential into tangible actions and preparing junior talent for LWSA's pipeline.

Most of the content is delivered by an external consultancy, and some by internal teams. In 2024, the Company invested R\$ 67,255.83 in development paths, giveaways, awards for projects, among others, and hired ten interns.

During the first semester, interns focused on developing an innovation/improvement project with multidisciplinary teams, on themes suggested by leaders and directly applicable to the Company. The projects were developed during seven workshops and, upon completion, were presented by seven groups to an evaluation panel composed of managers and coordinators.

During the second semester, interns enhanced their soft skills through four workshops on current themes to support the start of their professional careers. In addition to this content, interns discussed other matters, such as Inclusion and Diversity, and participated in business and career talks with the Company's most experienced professionals.

R\$ 67,255.83
invested in development paths,
giveaways, among others, in the
Internship Program.



LWSA also has a Trainee Program, which has been developing talent since 2014, aimed at professionals who have completed their undergraduate studies in courses related to the Company's business areas within the last two years. The goal is to develop soft and hard skills to prepare them for corporate challenges, in addition to renewing LWSA's team with new talents. In the past six editions, 60 trainees have been hired for different business units.

At each new edition of the Trainee Program, which currently lasts 18 months, trainees receive mentoring sessions and undergo development paths aimed at improving their skills and also participate in a challenging strategic project that directly impacts the Company. The 6th edition began in the second half of 2023 and ended at the end of 2024. Ten trainees were trained and participated, in 2024, in three job rotations, nine business talks

with executive officers, two workshops and twenty-four meetings with mentors and sponsors.

In 2024, we also held two workshops to develop the trainees' leadership skills. Most of the content is delivered by an external consultancy, and some by internal teams. In the year, the Company invested R\$ 99,363.38 in development paths, giveaways, awards for projects,

closing ceremony, among others. The Program is currently being reviewed, with changes expected for the 7th edition, which is scheduled to begin in the first semester of 2026. These changes are aimed at providing a more effective path for the Company to develop and identify potential talents for strategic positions in LWSA's ecosystem.

10 trainees
completed the training.

24 meetings
with mentors and sponsors.



Work environment

Our goal is to increase our employees' satisfaction level (eNPS), ensuring they have the best possible experience at LWSA.

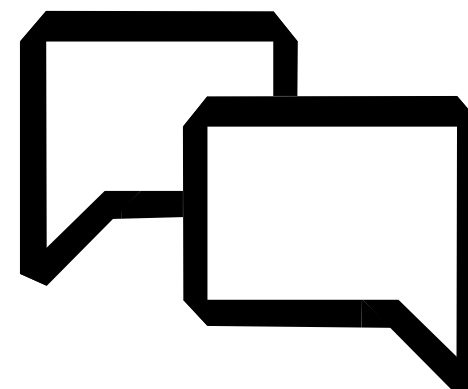
In 2024, we maintained the strategy of applying the eNPS survey to employees, which was conducted in two rounds: in March and September 2024. The survey was aimed at measuring employees' willingness to recommend LWSA as a good place to work, providing insights relating to employee loyalty. The survey also measured satisfaction levels relating to the Company's leaders and its products and services.

In September, we began to survey all LWSA employees through questionnaires aimed at measuring team engagement and identifying what factors influence this result, taking measures that increase employee engagement, retain talent and improve productivity.

Based on the outcomes of the surveys, action plans were prepared to promote even more transparency for career plans, benefits, and business strategy. Following, we also initiated a corporate culture project which, in 2025, will focus on defining LWSA's DNA in the post-M&A

scenario, after brands have been simplified. This project will guide all our business areas under the same values and behaviors.

Also, in 2024, the Bling and Tray brands participated in the Great Place to Work (GPTW) survey, which was aimed at assessing their trust culture, the effectiveness of their leaders, and their alignment in terms of purpose and values. The other companies did not participate in the survey in 2024, due to internal changes that affected the corporate structure, which resulted in several transfers and restructurings.



Benefits and Profit-Sharing Program

GRI 2-30, 401-2

All companies within LWSA offer the benefits listed below. Some have different eligibility requirements, as highlighted with ¹ or ².

General benefits:

- Healthcare plan.
- Dental care plan.
- Meal vouchers.
- Daycare allowance¹.
- Transportation voucher.
- Profit-Sharing Program (PPR in Portuguese)¹.
- Maternity and paternity leave¹.
- Home office assistance for employees under a hybrid or remote work model.
- Group life insurance.
- Gympass with reduced monthly fee and option to include family members.
- *Férias&Co.*
- Flockr pet healthcare plan³ (discount on all plans).

Benefit exclusively for employees registered at LWSA's headquarters, Locaweb and Nextios:

- Free LWSA products³.

Benefit exclusively for employees at LWSA's headquarters:

- Free shuttle service from the terminal to the nearest subway station.
- Free massage and psychological support services.

Benefit exclusively for officers (Level II), vice presidents and CEOs:

- Corporate vehicle paid by the Company.

Benefit exclusively for employees registered at LWSA's headquarters as officers (Level I):

- Corporate vehicle paid by the Company.

Benefit exclusively for employees at Bling²:

- **Education assistance:**
- **High school or technical school:** 45% subsidy of monthly tuition, limited to R\$ 150/month;
- **Undergraduate:** 45% subsidy of monthly tuition, limited to R\$ 300/month;
- **Postgraduate:** 50% subsidy of monthly tuition, limited to R\$ 300/month.
- **Language assistance (English and Spanish only):**
 - Employees who need the language for their position or activity: limited to R\$ 200/month;
 - Overall employees and team: limited to R\$ 150/month;
 - Management positions: limited to R\$ 250/month.

¹ This benefit is not valid for interns.

² This benefit is not valid for temporary employment contracts and interns.

³ This benefit is not valid at all units.

Parental leave, by gender

GRI 401-3

	2022		2023		2024 ²	
	F	M	F	M	F	M
Employees that were entitled to parental leave	13	0	42	45	52	49
Employees that took parental leave	13	0	42	45	52	49
Employees that returned to work after parental leave ended	13	0	42	45	51	49
Employees that were still employed 12 months after the end of parental leave ¹	6	0	24	34	31	36
Return to work rate of employees that took parental leave	100.0%	N/A	100.0%	100.0%	98.1%	100.0%
Retention rate (12 months) of employees that took parental leave ¹	46.2%	N/A	57.1%	75.6%	59.6%	73.5%

¹ Considers only employees that have maintained a relationship with the Company, regardless of the reasons for the termination of the relationship (including, but not limited to, terminations at the initiative of employees).

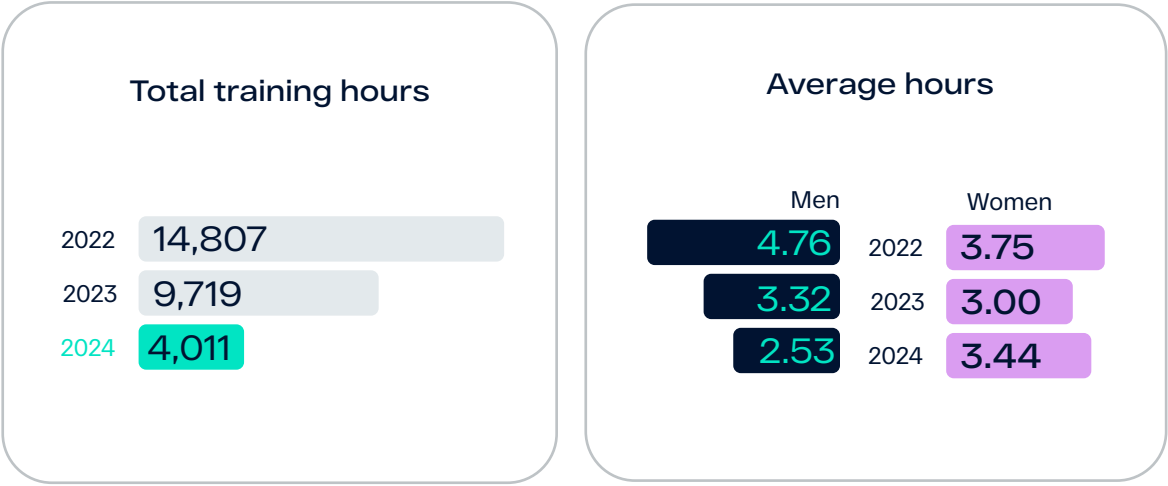
² Items related to return to work and retention rate after 12 months consider the 12-month period elapsed after the employee returned to work. For example, if an employee returned from parental leave in September 2024, the 12-month period ends in September 2025. Therefore, at the end of 2025, this rate can be updated.

Capacity-building and training

GRI 404-1, 404-2

We encourage our employees to improve their skills and grow professionally. Therefore, 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.

Average training hours per employee, by gender



Average training hours per employee, by employee category

Employee category	2022		2023		2024	
	Total hours	Average hours	Total hours	Average hours	Total hours	Average hours
Analyst I	9,050.65	10.96	3,869.5	3.33	970.0	2.61
Analyst II	1,220.4	2.09	1,760	3.92	348.5	3.49
Analyst III	753.63	1.96	692.5	3.64	627.0	3.30
Apprentice	90.5	1.37	31.5	1.31	37.0	3.36
Assistant	975	4.08	241	3.3	68.0	2.72
Auxiliary	7.5	0.94	31	2.82	2.0	1.00
Coordinator	1,036.7	2.24	363	3.42	511.0	3.13
Executive officer	75	2.42	971.2	2.97	31.0	6.20
Specialist	431.85	2.7	38.5	3.21	400.0	3.74
Intern	434.3	1.74	308	2.73	285.5	2.97
Manager	567.6	1.91	204	2	334.0	3.44
Technical leader	111.9	2.66	1,089	2.52	4.5	2.25
Supervisor	51.5	1.98	84.5	3.38	0	0
Vice-chairman	0	0	35	2.92	0	0
Total training hours	14,807		9,687		4,011.5	2.94

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:

Education Incentive: a policy aimed at LWSA (backoffice), Locaweb and Nextios to help employees pay for their education at external educational institutions in undergraduate, graduate, professional masters and language courses. Our policy determines funding up to 50% of the tuition fee, limited to R\$ 50,000. Of the scholarships awarded in 2023, three were maintained for 2024. In 2024, seven new Education Incentive scholarships were awarded. Upon being awarded the scholarship, the employee signs a contract extension, committing to remain with the Company during the course and for a certain period after its completion.

Upon being awarded the scholarship, the employee signs an addendum to their contract, committing to remain with the Company for the duration of the course and for a certain period after completion.

Quero Ser Dev: related to software developers, called “devs,” this Program aims 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 2024, we hosted the Program’s 9th edition, training 15 people, seven of whom were hired and continued working at the Company.

Over the years, *Quero Ser Dev* engaged 148 participants, with 86 being hired across different business units, maintaining a retention rate of 58.11%. Training is conducted in an online format and average attendance rate was 94.8%.

Following the hiring of these 86 program graduates, 46 individuals were promoted, including 30 promotions and 16 merit-based salary increases. The program included two affirmative editions: the 6th edition for women, with 963 applicants and 18 graduates, and the 8th edition for individuals over 40 years old, with 1,754 applicants and 24 graduates.

Level Dev: Program focused on the technical and behavioral development of junior and mid-level software developers to prepare them for the next stages of their careers. It prepares professionals to independently solve technology challenges in LWSA's business units on a day-to-day basis. In 2024, we hosted the 5th edition, training 29 developers. Over the course of the five editions, the program has trained 110 employees and has a 72.73% retention rate.

Heroes Guide: the Program aims to boost the careers of developers in Locaweb's Product Engineering team by empowering employees to take charge of their own careers 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 was held in 2021 and, by February 2025, the program had had 14 cycles.

Progr.Amar: aimed at developing and integrating People with Disabilities into on-site activities, enhancing technical and behavioral competencies through a personalized track. In 2024, seven people with disabilities completed the program, and 13 employees, including leaders and tutors, received training on inclusion in the workplace.

Youth Apprentice Program: in compliance with the Apprenticeship Law, LWSA maintains a Youth Apprentice Program for young individuals, ranging from 14 to 24 years old. Aside from the mandatory training schedule, the Company also offers a development path to develop soft skills and to provide career guidance. Training is conducted under five pillars: learning, career, discovery, development and opportunity. The key objective is to guide young adults in their professional choices and path, in addition to preparing them for their next career steps. In 2024, we had an average of ten apprentices participating in LWSA's development journey. The Company held the following events: six Knowledge Pills, one Navigating the Areas and two workshops. The content is delivered by internal teams, and we invested R\$ 841.88 only at the closing ceremony for a coffee break and giveaways.



Leadership development

In 2024, in line with, and to complement, our training paths, we supported newly promoted leaders by offering mentoring sessions with more senior leaders, which were organized by a specialized consultancy partner hired for this role.

We also focused on developing employees at management levels, aimed at enabling them to perform at their best capacity, guiding their career growth and evolution.

The leadership training, in 2024, was focused on connecting theory with practice by analyzing themes with real-case scenarios at the Company through performance-related processes, such as:

- Performance management process;
- How to elaborate quality evaluations;
- How to manage the outcomes of the performance review cycle;
- How to prepare for performance calibration forums;
- Succession Pipeline;
- Giving feedback;
- Mapping talents.

The training sessions were conducted by specialized consultants and/or specialists from the People, Culture and ESG team, with approximately 69% of our leaders trained.

In 2024, the candidates for the Succession Pipeline were invited to participate in the Make New Leaders program, which was designed to provide a unique opportunity for personal and professional growth and prepare them for future challenges at the Company. The training goals included:

- **Developing leadership skills:** covering themes such as effective communication, problem solving, decision making, interpersonal skills, and the ability to inspire and motivate others;
- **Cultivating management skills:** covering themes such as task delegation, time and resource management;
- **Providing networking opportunities:** connecting participants can be critical in developing their careers and building valuable relationships.

In 2024, the training program was conducted through a specialized consultancy, which held nine meetings and trained 28 professionals.

Partnerships with educational institutions

To drive innovation, knowledge and sustainable growth, besides allowing employees access to external perspectives and knowledge, we also maintain partnerships with consultancies and educational institutions aimed at jointly developing training programs tailored to the Company's specific needs and the interests of its employees.

We currently have over 20 active partnerships with educational institutions that grant our employees discounts on language, non-degree, undergraduate, postgraduate and MBA courses.

The educational partnerships established through the Corporate Development team seek to provide development

options with external educational institutions, offering our employees discounts and exclusive conditions.

This initiative strengthens our relationship with the academic community, generating opportunities for research projects, internships, trainees and corporate social responsibility activities, and also benefits

LWSA, its employees, the academic community and society in general.

Programs include in-person courses, workshops, seminars, webinars and other learning activities, covering technical and technological skills to behavioral and leadership skills. We leverage on the resources and expertise of our partners, enriching the diversity of our training programs.





99%

of employees covered by
the collective bargaining
agreement.

36%

of women at LWSA occupy
leadership roles.

Compensation and equal pay

GRI 2-30

Currently, practically all our employees (99%) are covered by the collective bargaining agreement, with the exception of our statutory officers, who receive a salary adjustment, linked to the IPCA index, every 12 months on the date of their contractual anniversary.

In 2024, in view of the goal established in 2023, which was to achieve equal pay across the Company, we continued to identify which positions mostly influenced salary gaps and to develop strategies aimed at aligning disparities, considering variables such as gender, race, length of service and individual performance at the Company, in line with the provisions of Law 14,611/2023 on equal pay and compensation criteria between women and men.

During the year, we carried out a more quantitative study to assess diversity and identified that we currently have a salary gap of 4%, in which men earn 4% more than women. However, 80% of the technology team at LWSA is occupied by men, which complicates salary proration. In Brazil, 85% of the technology market is composed of men. On the other hand, 36% of women at LWSA currently occupy leadership roles, which helps us balance the average salary.

In 2024, we redesigned our job and salary structure, which is expected to further help us reduce the salary gap in 2025. We are redesigning our job and salary structure, which is expected to further help us reduce this salary gap. Our goal is to understand, in detail, salary gaps based on gender and race, isolating factors such as seniority and performance, at all hierarchical levels and at all of the Company's business units.



Diversity and inclusion

GRI 2-7, 2-8, 405-1

The topic of Inclusion and Diversity (I&D) is part of the principles that govern our business and is a commitment made in our Code of Ethics and Conduct more than five years ago.

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

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. In 2024, female representation in our workforce reached 40%.

At LWSA, developing beyond technology also means taking care of people. Our commitment to a fairer, more diverse and inclusive work environment is reflected in the actions we promote internally, in which we listen to and value the different experiences that comprise our team. In 2024, this commitment was recognized by Great Place to Work (GPTW), which awarded us in three diversity categories:

Ethnic-racial:

8th place

LGBTQIAPN+:

10th place

Women:

22nd place

These results are particularly significant considering that only 4% of GPTW-certified companies in Brazil are ranked in the diversity category. For us, this recognition

reinforces that we are on the right path: promoting an increasingly plural, respectful and representative environment.

This scenario also reflects the data collected through our Diversity Census: among the participants, 17.6% identify themselves as LGBTQIAPN+ and 28% declare themselves black (including black and/or brown).

In 2024, we structured and conducted a training session with the compliance team on moral and sexual harassment and presented our Integrity and Consequence Management Policy. The training session for the Harassment and Integrity Policy had a total of 469 participants, of whom 54.1% were leaders and 5.81% were non-leaders.

17.6%
of respondents to our
Diversity Census identified
as LGBTQIAPN+ individuals.

In the coming years, we are committed to improving how we work with the collected data, engaging leaders in this initiative and improving all our internal communication and feedback processes, aimed at building an increasingly friendly and inclusive environment.

We seek to outline strategies that increase the Company's hiring of people with disabilities. In 2024, we had 96 employees with disabilities, 6% higher than in 2023, when we had 90.



Inclusion and Diversity Committee

Our committee is structured into six special focus areas: women, people with disabilities, LGBTQIAPN+, masculinities, generational diversity and cultural and ethnic diversity. This committee not only leads strategic initiatives to foster a more inclusive work environment but also serves as an important channel that supports and welcomes all employees belonging to underrepresented groups.

In 2024, we decided to extend our corporate volunteering program to a one-year cycle, thus ensuring more time to plan actions and generate impact. We also revised the structure of the committee's fronts, strengthening our joint efforts on strategic topics related to women's experiences. This movement aims to consolidate efforts and bring an even more integrated and consistent approach to our initiatives.

Also in 2024, we structured, for the first time, the 'Meet the Committee' agenda to ensure that all newly hired employees, in every business unit, were introduced to our inclusion and diversity initiatives. What was once a monthly agenda with optional subscription is now an official part of the onboarding process, connecting every new employee to our culture and values from day one.

In 2024, we decided to extend our corporate volunteering program to a one-year cycle, thus ensuring more time to plan actions and generate impact.



Social actions carried out by the Women's Front:

The Women's Front of LWSA's Inclusion & Diversity Committee launched an extremely important social campaign: collecting sanitary pads to combat menstrual poverty. This initiative aims to support NGOs dedicated to this cause, ensuring those who menstruate and that are under social and financial vulnerability have access to menstrual hygiene products, a fundamental right to dignity, health and well-being. In addition to this collection effort, we held a discussion group on the topic with the NGOs involved in the initiative as a strategy for raising awareness and increasing collections.

- R\$ 1,733.00 donated to the MenstrUA NGO (direct donations from employees to the NGO).
- 180 packs donated to the *Absorvendo Amor SP* NGO.

Other actions carried out by the Women's Front:

- Distribution of the "*Respeita as minas, as mana e as mona*" stickers (LWSA headquarters).
- Visibility for the International Day of Women and Girls in Science (February 11th), recognizing women in history and looking at women in technology.
- Visibility for the Women's Vote Day in Brazil (February 24).
- Talk: A woman's place is...
- Mother's Day Tribute: I'm a mother and a professional.
- Collection of scarves for NGOs that support women with breast cancer.
- AS MARA Thrift Store (*Gerando Falcões + Resgatando Vidas*).
- Women's Entrepreneurship Fair - Empreende Aí.

Actions carried out by the Cultures and Origins' Front:

- Update of the racist speech e-book, with replacements.
- Relaunch of the anti-racist speech e-book.
- Creation of the *Raízes* group (cultures and origins) on Slack.
- Educational film: Black Awareness.

Actions carried out by the LGBTQIAPN+ Front:

- Roundtable: TRANSforming careers.
- LGBTQIAPN+ Pride Month Commemorative Video.
- Creation of the valley group (for LGBTQIAPN+ people and allies) on Slack.
- Practical manual – simplifying inclusive language (under construction).
- Roundtable: LGBTI+ Leadership.

Actions carried out by the People with Disabilities' Front:

- Educational content day for people with Down Syndrome.
- Educational video on types of deafness.
- Awareness-raising talk with TA and BPs – external consultancy.
- Tactical plan for retaining People with Disabilities.
- 1st People with Disabilities gathering at LWSA.
- Creation of the “Plural” group (People with Disabilities and allies) on Slack.

Actions carried out by the Masculinities' Front:

- Blue November content: Men Box.

Actions carried out by the Generational Front:

- **Roundtable:** We've been young for longer: Technology evolution over the years.

Health and safety

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

We demonstrate our commitment to our employees' well-being and quality of life through the *Se Cuida* Program, which offers every employee psychological support and on-site massage sessions at the Company, as well as access to a nutritionist and personal trainer, aimed at promoting a balance between personal and professional life to reduce stress and burnout. We also offer Gympass and Férias&Co benefits to workers and their families, aimed at encouraging moments of self-care and well-being.

We follow all the requirements, protocols and procedures relating to occupational health and safety management, in which we highlight the following standards:

- **NR 10:** Electric installation and service safety for the data center team performing maintenance work on all of the Company's electrical grid and generators.
- **NR 12:** Safety of machinery and equipment for the hardware team using the hydraulic press to destroy unneeded hard drives.
- **NR 23:** Fire protection for members of the Company's fire brigade and occupational hygiene aimed at preserving the health and integrity of workers through the anticipation, recognition, assessment and control of existing or potential environmental risks in the work environment.

On October 28, 2024, we conducted an area evacuation drill, in which 20 of our brigade members evacuated nearly 600 employees in 5 minutes and 15 seconds, as audited by the Asset Group, which assisted us in this activity.

Occupational safety is mainly targeted at workers executing high-risk activities in energized locations, such as data centers; our brigade members, who must be constantly trained and ready for any eventuality; and the members of our building maintenance team, who work in different locations and need guidance in carrying out their activities the safest way possible using personal protective equipment under good conditions.

The Company maintains an outpatient clinic, in which a licensed occupational health nurse provides care assistance during business hours on simple tasks such as performing blood pressure measurements, blood sugar tests, dressings on wounds, referring em-

ployees to medical care units (as needed), and filling out a general outpatient service spreadsheet. This spreadsheet is used to monitor outpatient care to identify the main problems faced by employees and plan health and safety actions accordingly. We have an Internal Commission for Accident and Harassment Prevention (Cipa, in Portuguese) for workers to report incidents, and an occupational safety technician, who is always available to listen to employees.

Employees are protected according to item 1.4.3 of NR01 (general provisions), which states: "A worker may interrupt his/her activities when he/she finds himself/herself in a work situation that, in his/her opinion, involves a serious and imminent risk to his/her life and health, immediately informing his/her superior". When a work incident or accident occurs, the occupational safety technician contacts the person involved or, when this is not possible, he/she contacts the witnesses and fills out a work accident investigation report.

In 2024, we held an initiative in partnership with the H. Olhos team to offer free eye exams. Other integrative actions were carried out during the SIPAT 2024 event, which was held from November 25 to December 2, including discussions on mental health, yoga activities, workplace gymnastics, a first aid discussion with *Dez Emergências*, and a live broadcast regarding defensive driving with Localiza, in addition to a prize draw at the closing ceremony.

In terms of formal health committees, we hold monthly meetings with Cipa to discuss overall occupational health and safety issues. The chair is responsible for convening all members to the meeting, coordinating the meetings, keeping the Specialized Service in Safety Engineering and Occupational Medicine (SESMT in Portuguese) informed about the work conducted by Cipa and delegate tasks to the Vice Chair. The Vice Chair may replace the Chair when he/she cannot attend, and delegates tasks to the Cipa

members, in addition to informing decisions made by Cipa to all employees at the Company, which is done through meeting minutes, reports, or other means. The secretary must attend meetings and prepare their minutes, send out meeting notices and perform other tasks that have been assigned.

The 2024/2025 Cipa management team is composed of 18 employees (nine elected members and nine appointed members) and was trained by Care Plus, an outsourced company, pursuant to Regulatory Standard NR05.



Customer relations

GRI 3-3 Material topic: Customer experience

Over time, our strategy has been to make acquisitions with a very clear vision of adding increasingly more value to our customers by serving them on all business fronts that rely on our solutions, from creating an online store to sell their products, offering logistics solutions for more competitive deliveries, and enabling safe and convenient payment methods (credit card, bank slip, and Pix) on their e-commerce platform.

We focus on innovation, integration and security to support companies in their digital ecosystem, offering solutions for their online presence, e-commerce, management and financial services. We serve more than 700,000 customers in different sectors, including SMEs and large companies, connecting technology and business in an efficient and integrated way.

We participate in our entrepreneurial customers' entire digitalization journey, regardless of their segment and size, aimed at helping businesses come to life and thrive through the use of technology. Our services include e-commerce platforms, ERP, marketplace integration, POS, recurrence, lead generation, credit and logistics solutions, among others.

We participate in our customers' journey on three fronts, which we plan to advance in the coming years:

Omnichannel journey: in 2024, we expanded our e-commerce platforms, turning them into a complete omnichannel solution, which integrates the digital and physical (offline) worlds through the launch of an integrated POS (software), with the possibility of unified payment capture and logistics. Within this scope, we have expanded this offering with a management module for multi-stores and franchises for SMEs, which is already being used by some of our customers. In summary, we seek to assist customers who operate offline in becoming more digitalized and in transitioning to an online format, connecting both models to improve their services and how they execute tasks and processes. To achieve this, we offer a very efficient tool, called ConnectPlug, that supports our customers' entire omnichannel journey.

Financial Services: we support our customers by offering working capital products as quickly, efficiently and with as little bureaucracy as possible, helping them make their projects feasible, in planning their expansion or in implementing new businesses. In terms of payments and financial solutions, in 2024, we obtained approval from the Central Bank of Brazil to operate as a Payment Institution and we began offering digital account products to our customers, another important step in the journey offered within our ecosystem.

Logistics: we offer our customers a solutions marketplace in which they can automatically find the best service and conditions available for their deliveries by simply entering their desired origin and destination. This guarantees them security, agility, convenience, and most importantly, savings.

Customer profile

GRI 2-6, 3-3

In 2024, 695,000 active customers used our solutions ecosystem. They are mainly small- and medium-sized businesses operating in various sectors of the economy, benefiting from our services in one or more business fronts, as described in the table below.

Vertical	Main segments
Commerce enterprise	<ul style="list-style-type: none">• Apparel and shoes;• Home and decor; and• Electronics and home appliances.
Commerce SMB logistics	<ul style="list-style-type: none">• Apparel and accessories;• Home and decor;• Beauty and health;• IT; and• 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; and• 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; and• Electronics;.
Financial services	<ul style="list-style-type: none">• Gyms and fitness;• Education;• Beauty and cosmetics;• Health;• Subscription clubs;• Insurance companies; and• Retail.

Service channels

GRI 3-3: Material topic: Customer experience

The pursuit of customer satisfaction drives all our decisions. Our service mission is to deliver a solution to the customer in the shortest possible time and with an excellent relationship. In our customer service satisfaction survey, we always ask customers to evaluate this mission.

Our customer service is currently 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 available, our N2 team steps in. N1 analysts have IT backgrounds

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 in which we are making progress: 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).

We base ourselves on the Reclame Aqui (RA) portal to gauge the efficiency of our customer service. Our key operations have the RA1000 seal, a certificate that is granted to companies with excellent service ratings on the portal.

In addition to proactively monitoring the indicators, we maintain open communications with our customers regarding scheduled changes to their services, in addition to transparently reporting on our status page incidents that could massively degrade products.

In 2024, we scored 70 points in our service satisfaction survey, using the same scale as the NPS methodology, which ranges from -100 to 100. This means that, of the 155,000 satisfaction surveys carried out during the year, 135,000 (81%) customers gave the solutions delivered by our Customer Service team a score of 9 or 10.

In the other two pillars (agility and relationship), we scored 66 points. In terms of agility, in which customers evaluate how long we took to deliver a solution, 129,000 (77%) gave us a score of 9 or 10; in terms of relationship, in which customers assess the demeanor of our customer service professionals, 151,000 (90%) gave us a score of 9 or 10.

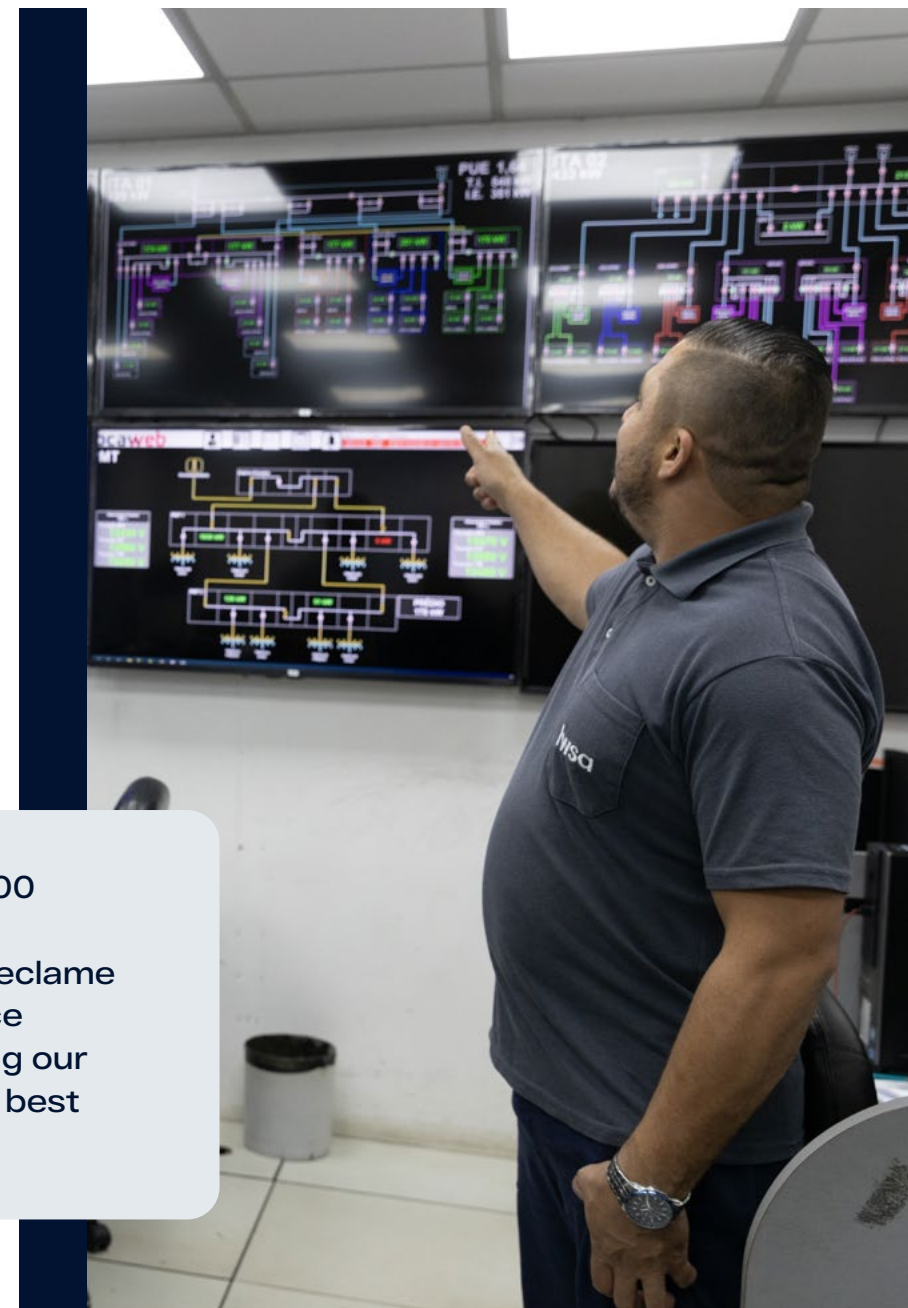
In addition to our customers' feedback, collected through our satisfaction and NPS survey, we also use artificial intelligence to analyze the contacts made through the chat bot and WhatsApp, which help us identify improvement

opportunities for our service and products. The result is consolidated by our Quality team and opportunities are addressed by the corresponding areas.

In 2024, Locaweb, which has the RA1000 certificate (maximum reputation), also became a four-time champion of the Reclame Aqui Award, the most important service and reputation award in Brazil, attesting our commitment to offering customers the best service possible.

In addition to the Quality team, which is dedicated to these topics, we also carry out periodic training sessions to increase the team's knowledge and update our dashboards on a daily basis to address the KPIs required for us to maintain our high satisfaction levels.

In 2024, Locaweb, which has the RA1000 certificate (maximum reputation), also became a four-time champion of the Reclame Aqui Award, the most important service and reputation award in Brazil, attesting our commitment to offering customers the best service possible.



Promoting entrepreneurship

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

Main programs focused on entrepreneurship:

- **Octa *Ensina*:** a learning platform, launched by Octadesk in 2025, focused on developing customer service teams. The platform offers practical content, such as training, webinars and materials to improve customer experience, allowing companies to invest in the knowledge and development of their employees, particularly the ones involved in customer service.
- **E-commerce school:** a free content portal for SMEs, with over 2,000 articles and more than 500,000 monthly views. As customers evolve in their discovery and learning journey, we begin to introduce Tray and its entire ecosystem, strengthening our sales intelligence.
- **Exclusive courses for customers:** we combined our practical course platform, E-Tray, and our strategic course platform, E-comClass, to provide the knowledge customers need to be successful.

- **KingHost Connection:** a free on-demand content platform aimed at entrepreneurs and technology professionals who wish to develop their online projects. The platform was created, in 2012, as an in-person event and transitioned to the online format in 2015. In 2024, over 2,000 new users were registered, and more than 800 pieces of content were viewed.

Educational materials launched in 2024

- **The Bling Academy:** a learning platform developed by Bling, aimed at training entrepreneurs, store owners and users of Bling's system to manage their businesses, from starting a company, to sales scaling and how to efficiently master business management tools. Through courses, tutorials and educational materials, the Bling Academy offers content that supports everyday business management, in addition to addressing topics that every entrepreneur needs to know and teaching how to use the system's functionalities. The proposal is to facilitate its users' daily activities, promoting more autonomy, productivity and knowledge about how to operate, maintain and scale their businesses, in addition to making strategic use of the system to boost their results.

Octa *Ensina*

offers practical content, such as training courses and webinars.

+2,000

new subscribers and 800 pieces of content viewed on KingHost Connection.

Supply chain

LWSA's relationships with its suppliers and service providers must consider the legitimate interests of all parties involved, always based on technical parameters, not allowing undue advantages, which may be obtained through manipulation of information, intimidation, coercion, duress, constraint or any artificial situation of dependency created by the other party involved, either through unfair compe-

tition practices or situations characterized as a conflict of interests with LWSA's operations. All our potential suppliers and service providers have access to the same information during the quotation and/or bidding processes.

Know Your Partner: as a basis for decision-making when hiring strategic suppliers, we use the Know Your Supplier

(KYS) methodology. Commercial, financial, and compliance reports are submitted through a specific platform. Thus, approvals consider not only these indicators but also the three pillars of ESG, which include an ethical and socially responsible stance, in order to avoid favoritism and privileges in the relationships we establish.

Our suppliers must, above all: (i) be trustworthy; (ii) comply unequivocally with applicable laws and regulations, as well as with LWSA's rules, codes, policies and procedures; (iii) not use child labor or forced labor; (iv) maintain strict confidentiality of the Company's information and the information of its customers, partners and employees.

To ensure impartiality and transparency, our general rule is to prohibit employees from participating in supplier and service provider hiring decisions when they are partners or directors of the prospective companies, or when they have personal relationships with individuals associated with those companies.



Relationship with the community

In addition to supporting our customers' demands for each business, we also promote educational initiatives to develop communities and encourage professional training and growth, envisioning future hiring possibilities at LWSA.

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. We support the development of female entrepreneurship, and we have long-established and successful programs that sponsor and encourage new ideas.

We seek to reduce disparities by providing inclusive educational experiences that not only develop technical skills but also builds a support network to boost professional careers in an equitable and diverse way.

Digital inclusion

We promote digital inclusion actions aimed at developing employees, assisting customers and boosting education and employability for young people.

In 2024, we held the 2nd edition of Conectaê, a social project for the development of young individuals (ages 15 to 17), who are under the foster care of the Institutional Reception Service for Children and Adolescents (Saica, in Portuguese). In this edition the project, which focuses on the employability of these young people, we improved its basic training development path (digital literacy and soft skills), offered two technical path options according to the person's aptitude test and choice (Social Media Path and Software Developer Path), introduced the Hands-On project, held with daily live classes and offered marketing mentorship. The technicians at Saica also received training during three occasions, on topics related to diversity and communication. In the last two years, Conectaê achieved the following results:

50
young adults
have been
impacted

80%
course completion
rate; and

20%
employability rate

KingHost Connection

A KingHost Connection's mission is to bring quality content to all entrepreneurs and technology professionals seeking to develop their projects on the internet. Its first edition was held in 2012, as an in-person event. But, as we are always evolving, in 2015 we migrated to an online event – and now we come to you as an on-demand content platform, with completely free recorded classes.

In 2024 alone, the project had more than **2,000 new registrations**, with more than **800 pieces of content viewed**.

Project data for the year:

2,033
new users

1,090
active users

1,288
enrolments

808
classes completed

Diversa Digital

We have been running **Diversa Digital** at KingHost since 2020, a project that offers IT training to minority groups. In four years of the project, more than 1,300 people have been impacted, in editions aimed at the following audiences: the 50+ generation; LGBTQIAPN+; black people; women; and socially vulnerable people. The latest edition was aimed at women, with classes recorded and made available through a 100% online platform, free of charge and with a certificate at the end of the course.

In 2024, there were

920 people registered and
155 participants

TDC +Diversidade (+Diversity)

KingHost is committed to promoting diversity in the technology sector, and one of the ways to achieve this goal in 2024 was through the **+Diversidade (+Diversity) Programme**, in partnership with The Developer's Conference event.

We offered more than **40 free tickets** to members of underrepresented groups, such as women, black people, indigenous people, LGBTQIA+ people, people with disabilities, and professionals over 50 years of age.

Result:

210 registrations, with 100%
of tickets distributed and 47% used.

Official announcement of the
event
[https://www.instagram.com/
reel/C_9DLY2OAIT/](https://www.instagram.com/reel/C_9DLY2OAIT/)

Orgulho em Hospedar (Proud to Host)

We also took advantage of our participation in TDC to promote the **Orgulho em Hospedar**, (Proud to Host) programme, which offers free hosting to NGOs and communities.

The promotion of the project during the TDC SP event generated **27 new registrations**, which resulted in six **new projects being approved**.

Social responsibility

Following the launch of our Private Social Investment Guidelines and Premises (ISP in Portuguese) in 2023, which is aimed at directing our investments more effectively, we began allocating incentives towards projects that are related to our goals for 2030. Thus, we integrate our business model with our purposes.

The People, Culture and ESG Department is responsible for analyzing which initiatives and projects are eligible for these investments, which are offered through sponsorships or the Company's products, free of charge, aimed at helping people, in some way, conduct their business and achieve goals.

LWSA's headquarters are located in the south region of the city of São Paulo, next to the Peinha community, and it has maintained an active relationship with community leaders through meetings organized by the ESG team. These meetings are aimed at strengthening ties with this community by assisting several initiatives, such as donations of basic food boxes and toys, and supporting sports and cultural activities, such as the soccer team and the martial arts group for children and adults.

In addition to social engagement, LWSA seeks to be a source of opportunities for local residents. Planned initiatives include:

Local hiring: We are committed to including the community in job openings offered by the Company. To achieve this, we carry out comprehensive recruitment processes, particularly for customer service positions, which are also actively advertised in the community. This effort not only meets our staffing needs but also strengthens community ties and contributes to the region's economic development.

Our premises	ODS
 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:



Support for local entrepreneurs: We will implement a program to identify local entrepreneurs, aimed at promoting and integrating their products and services into the Company. This includes a joint effort with the Empreende Ai institution to offer entrepreneurship training, strengthening local businesses. We also insist on supporting community events, prioritizing the acquisition of local products to reinforce our commitment to the community's sustainable economic development.

Encouraging education: We are assessing the educational institutions that serve the Peinha community, aimed at directing our investments to effectively support the goal of providing "quality education for all". We also plan to facilitate the donation of five computers in 2024 to establish a community Lan House, promoting access to technology and digital learning, which are essential for educational development.

Digital literacy in the Peinha community

Aiming to expand access to technology and promote digital inclusion, we offered a digital literacy program focused on young adults at the Peinha community. This initiative was held through ten sessions focused on technical development and five sessions to address themes such as careers and employability.

Participants were nominated by local focal points who, after an opening event, confirmed their interest in participating in the training journey. A total of nine young adults participated in the training sessions which were held, in-person, at the Company's premises using its computers.

The technical content covered basic technology concepts to the introduction of programming concepts, including digital security, social networks and the essential tools for daily digital activities. The Employability Track brought reflections on professional paths in the technology field, focusing on developing socio-emotional skills, self-knowledge and career planning.

Below is a list of the modules offered in the training course:

- **Module 1:** Introduction to the Digital World;
- **Module 2:** Basic Knowledge of Hardware and Software;

- **Module 3:** Browsing on the Internet and Online Searching;
- **Module 4:** Social Networks and Digital Communication;
- **Module 5:** Essential Digital Tools;
- **Module 6:** Digital Security and Good Online Practices;
- **Extra Module:** Professional Paths in the Digital World.

Although we did not conduct a formal assessment, testimonials during the process indicated that significant progress was achieved: participants demonstrated greater confidence in applying for jobs that require basic digital skills, as well as interest in producing digital communication materials for local projects or starting a small online business. We also perceived an awakening of curiosity for technology careers, particularly after introducing programming concepts.

This initiative is part of LWSA's commitment to contributing to the reduction of social inequalities by offering education and access to technology.



ENVIRONMENTAL MANAGEMENT

Energy

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

Energy consumption at the headquarters and data center (GJ)

	2022	2023	2024
Non-renewable fuels	23,027.34	34,837.70	19,432.16
Gasoline (automobile)	5.34	0.30	0.16
Diesel	0.00	1,455.50	2,165.50
LPG	23,022.00	33,381.90	17,266.50
Electricity consumption from the free energy market (non-renewable)	57,978.53	0.00	0.00
Electricity consumption from the free energy market (renewable)	0.00	55,994.80	54,364.97
Total energy consumption	81,005.87	90,832.50	73,797.13

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.

As regards environmental management, we are mainly focused on the high consumption of electricity as a result of our activities as a technology ecosystem, especially due to the constant use and need for cooling in our own data center.

Over the last five years, we have reduced 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

ones, with greater capacity and lower energy consumption.

Currently, 35.21% of our emissions come from the consumption and generation of electricity. As regards data center management, we are focused on maintaining the excellence of existing processes. We adopt good maintenance practices for infrastructure equipment to ensure that it is within 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 ex-



tended power outages. IT and data center operation managers are responsible for ensuring that generators are regularly tested, properly maintained and ready for use should the need arise.

Since September 2016, we have also been buying fully renewable electricity on the Free Energy Market, and we have a purchase agreement for incentivized energy until 2027.

Cost reduction

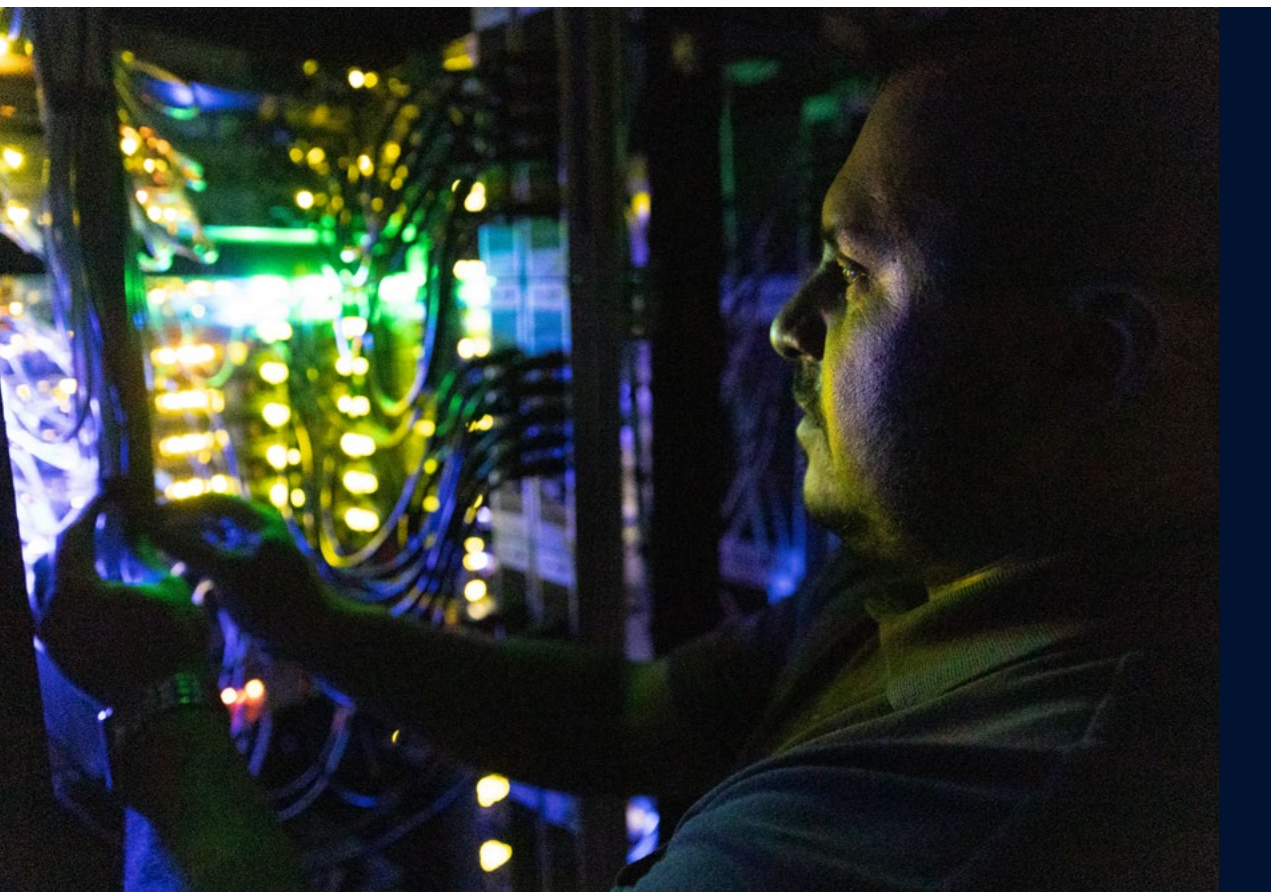
The main benefit of joining the Free Energy Market is cost reduction, because energy is acquired directly from the supplier, offering more competitive and, most of the time, more attractive prices than in the captive market.

Overall, buying energy on the free market leads 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 LWSA's balance sheet, affecting various stakeholders. Furthermore, operational resilience is fundamental for all stakeholders: It can create long-term value for the Company and guarantee business continuity as well as our reputation, customer satisfaction, financial stability and regulatory compliance.

There is no specific climate change-related risk that could directly impact the Company. However, it is worth noting that

LWSA has mapped the risk of electricity unavailability. Climate change and, consequently, weather events directly affect power supply, through changes in the availability and reliability of generation sources, such as hydropower plants. This can lead to energy becoming more expensive and unaffordable, impacting the Company's financial planning.

We understand that investing in operational resilience is essential to mitigating risks and minimizing interruptions. Therefore, our 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 face power outages.



Mitigation and adaptation to climate change

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

Total GHG emissions, by Scope (tCO₂e)

Scope	2022	2023	2024	2024/2023
Scope 1 ¹	122.2	182.27	249.38	36.8%
Scope 2 ²	703.5	611.76	845.39	38.2%
Scope 3 ³	-	943.29	2,063.16	118.7%

Note¹: gases included in the calculation: CO₂, CH₄, N₂O and HFCs. Considers stationary combustion, mobile combustion, and fugitive emissions.

Note²: gases included in the calculation: CO₂, CH₄ and N₂O.

Note³: gases included in the calculation: CO₂, CH₄ and N₂O. The calculation of Scope 3 emissions started in 2023. 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) was used as GWP source. In 2024, two new categories were added, upstream transportation and leased assets.

Being a carbon-neutral company is one of our 2030 targets and reflects our commitment to sustainability, environmental preservation and climate change mitigation. We devote our efforts to the following stages:

Emission reduction: identifying measures to reduce our own carbon emissions, such as improving energy efficiency, adopting cleaner technologies and investing in renewable energy, for example.

Carbon offsetting: even after reducing internal emissions, it can be difficult to completely eliminate all carbon emissions. In these cases, we invest in car-

bon offset projects, such as reforestation, forest conservation and carbon capture and storage (CCS), or in the financing of renewable energy projects.

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

LWSA offset its Scopes 1, 2 and 3 greenhouse gas (GHG) emissions related to its 2023 operations. In total,

1,738 metric tons were offset using Reducing Emissions from Deforestation and Forest Degradation (REDD) credits.

In 2024, we also completed the compensation process by purchasing carbon credits for emissions from 2023. Emissions were offset through verified emissions reductions generated by the REDD+ Jari Amapá Project (VCS ID 1115), certified by Verra, with validation and verification according to the Verified Carbon Standards (VCS) and Climate, Community & Biodiversity (CCB) Standards. This project has been recognized with the Gold seal in the Biodiversity category, highlighting its excellence in environmental and social benefits.

Located in a private area in the state of Amapá, the REDD+ Jari Amapá Project is a joint initiative between Ambipar and the Jari Group, covering more than 117,000 hectares under management. It is the first project implemented in the world's largest private carbon program and combines sustainable forest management practices with agro-extractivism to conserve the forest and promote social development.

The project is part of the REDD+ Vale do Jari Program, which seeks to include as many rural producers as possible in pol-



icies to encourage family production, supported by civil society institutions. These actions strengthen regional production chains, improve the well-being and food security of communities as well as create jobs and generate income for families in the Vale do Jari region, promoting a sustainable conservation and socio-economic development model.

In addition to conserving the standing forest, the project protects local biodiversity, covering 343 species of fauna (including six endangered species) and 350 species of flora, many of which are endemic to the region. It also directly contributes to several Sustainable Development Goals (SDGs), by promoting sustainable food production systems and developing agroforestry systems. Currently, 124 families in 13 communities benefit from technical support, rural extension and training aimed at strengthening technical and management skills.

The REDD+ Vale do Jari Program seeks to include as many rural producers as possible in policies to encourage family production, supported by civil society institutions.

With regular external audits, the REDD+ Jari Amapá Project ensures the quality of its actions in fighting deforestation, reducing emissions and generating social and environmental benefits.

Impact of the REDD+ Jari Amapá Project

117,000
hectares under
management;

124,000
tCO₂eq of emissions
reduced per year;

350
species of flora,
with no endangered
species recorded yet;

343
species of fauna, six of
which are endangered;
and

124
families benefited.

CO-BENEFITS

The REDD+ Jari Amapá Project contributes to the UN's Sustainable Development Goals (SDGs)



2 ZERO HUNGER



The project helps fight hunger by setting up sustainable food production systems; recovering previously degraded areas by setting up agroforestry systems; and diversifying agricultural production by setting up seedling nurseries.

4 QUALITY EDUCATION



124 families have already benefited from intensified technical support and rural extension services, as well as training focused on production, social organization, cooperativism, leadership and financial management, thus developing technical and professional skills.

5 GENDER EQUALITY



All the project activities are open to all the residents of the communities involved and participation is encouraged, especially with women, young people and marginalized people. A total of 259 women have already benefited from the training, 14 of whom have had their quality of life improved as a result of the initiatives.

12 RESPONSIBLE CONSUMPTION AND PRODUCTION



The project promotes the conservation of natural resources, combined with socio-economic development, focusing on supporting sustainable business chains to improve the well-being of local communities, in addition to encouraging the responsible exploitation of natural resources, low-carbon agriculture and recovery of degraded areas.

13 CLIMATE ACTION



The REDD+ Jari Amapá Project has the potential to reduce GHG emissions by 3,450,278 tCO₂eq over 40 years. The carbon credits are generated by preventing the total deforestation of 79,129 hectares of native forest.

15 LIFE ON LAND



The project promotes biodiversity conservation, guaranteeing the maintenance of ecosystem services, protecting High Conservation Value (HCV) Areas and serving as an ecological corridor in preserved areas of the region, benefiting 343 species of fauna (six of which are endangered) and 350 species of flora, including a number of endemic species.

Source: <https://biofilica.com.br/projeto-redd-jari-amapa/>

CDP

The Carbon Disclosure Project (CDP) is an international non-profit organization considered to be the financial sector's main initiative for climate change mitigation. In 2024, we participated in the reporting cycle for the third consecutive time. With the revision of the CDP questionnaire, which now includes new management aspects, we were recognized with a D score, which represents the initial stage of environmental disclosure. This result places us among the companies that have started their journey towards climate transparency, specifically within the Marketing and Web Services category. Therefore, we identified areas for improvement in the mapping of social and environmental risks, with a focus on enhancing the impact management strategy.

Participating in the CDP allows us to measure our impact on the environment and gain a competitive advantage in terms of attracting investment funds that check the CDP score before investing. Furthermore, the CDP also connects shareholders and companies to leverage businesses related to global warming mitigation; maps the major sources of gas emissions, establishing a global standard for reporting gas emissions and energy use; provides transparency on activities for customers and shareholders; and identifies new risks in the value chain.

GHG reduction targets

It is important to note that although the Company does not have specific emission reduction targets, this does not necessarily mean that LWSA is not committed to environmental sustainability. Many companies adopt more holistic approaches to en-

vironmental management, such as implementing energy efficiency practices, investments in renewable energy or recycling programs, even without setting specific numerical targets.



Waste management

As part of our ESG Agenda, we pay special attention to recycling, aimed at reducing waste volume and disposal and contributing to environmental preservation. Our actions are as follows:

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

- We follow an internal Secure Disposal Policy that ensures proper handling of all our hardware. Each piece of equipment undergoes a thorough assessment, followed by a rigorous data sanitization process to preserve the confidentiality and integrity of information.
- We assess whether machines can be reconditioned to be donated to charity, respecting our Donations and Sponsorships Policy.
- In hardware disposal, we carry out the de-magnetization and destruction of defective disks or those that will no longer be used/sold.
- We carry out selective waste collection – there are bins where employees can dispose of plastic, metal and clean paper separately from organic waste – and forward recyclables to appropriate places.
- We delete data entered into machines, to prevent any leakages of protected customer or employee information.



ECONOMIC AND OPERATING PERFORMANCE



Operating performance

In 2024, despite the challenging economic context, we made important progress, reflected in the expansion of Gross and EBITDA margins vis-à-vis previous periods. The Company consolidated its position as an important ecosystem in the Brazilian e-commerce market, with a market share of more than 20%.

In the first year following the consolidation of the LWSA brand, we recorded significant productivity gains and higher operating efficiency. The Company gained a more comprehensive view of its processes, integration and efficiency

by implementing a new People Management and Strategy department.

We must also highlight the important advancements seen in our products in 2024, offering greater value to our customers and consolidating our role as facilitators and drivers of growth in the sector. Based on that, our Strategic Plan makes clear what we want to achieve over the next five years: We want growth with efficiency. We want to keep LWSA at the forefront, working continuously to fulfill our important role in the segments in which we operate.

Our operating indicators continued to grow above market averages. We ended 2024 with 193,200 paying e-commerce platform subscribers in our base, up by 4.8% from the previous year. The LWSA ecosystem's GMV reached the milestone of R\$69.7 billion, 18.4% higher than in 2023, representing a significant share of the Brazilian e-commerce market.

20%

of the Brazilian e-commerce segment belongs to LWSA.

4.8%

growth in the e-commerce customer base.

193,200

paying subscribers to the e-commerce platform.

In 2024, we recorded year-on-year growth of 16.3% in sales at owned stores, above market average, driven by the solid value proposition of the LWSA ecosystem, which allows shopkeepers to boost their sales in various media and channels on their own through their control panels. This process is supported by our e-learning ecosystem, which aims to give shopkeepers greater power over their marketing efforts. In 2024, total payment volume (TPV) was R\$7.6 billion, up by 15.2% from 2023. This result was mainly due to the accelerated capture of synergies between the acquired companies and our payment solution.

Key operating indicators (R\$ million)

	2023	2024	variação
Number of platform subscribers (thousand)	184.3	193.2	4.8%
Ecosystem GMV	58,827.0	69,664.0	18.4%
TPV	6,578.6	7,581.7	15.2%

The year 2024 was marked by important advancements in our products, offering greater value to our customers. We expanded our e-commerce platforms, turning them into a complete omnichannel solution, which integrates the digital and physical (offline) worlds through the launch of an integrated POS (software), with the possibility of unified payment captu-

re and logistics. Within this scope, we have expanded this offering with a management module for multi-stores and franchises for SMEs, which is already being used by some of our customers.

We made Live Shop available to our SME customers. This solution allows our customers to make live broadcasts in their stores, with an integrated shopping cart and full control of the products directly from the control panel, a strategy that is widely used in countries where e-commerce is at a more advanced stage than in Brazil. We have thus expanded the sales channels available to our customers.

We launched a productivity solution based on generative AI (Woz), which is transforming the customer service and sales of our clients by reducing their operating costs and increasing operational efficiency through its three integrated solutions, namely: (i) *Woz Agente*, which responds to up to 40% of demands instantly; (ii) *Woz Co-Piloto*, which assists teams with smart and personalized responses; and (iii) *Woz Transcrição*, which converts and summarizes audios to optimize service time. This technology has already boosted our customers' productivity by more than 50% (service time and volume), redefining the way companies communicate and scale their operations.



Throughout 2024, we restructured Squid, which was widely discussed with our investors and completed within the year. Since then, Squid has recorded revenue and profitability increases, quarter after quarter. It is worth noting that, in the first quarter of 2025, the comparison bases will be properly aligned for the ecosystem, so it will no longer be necessary to disclose Ex-Squid figures.

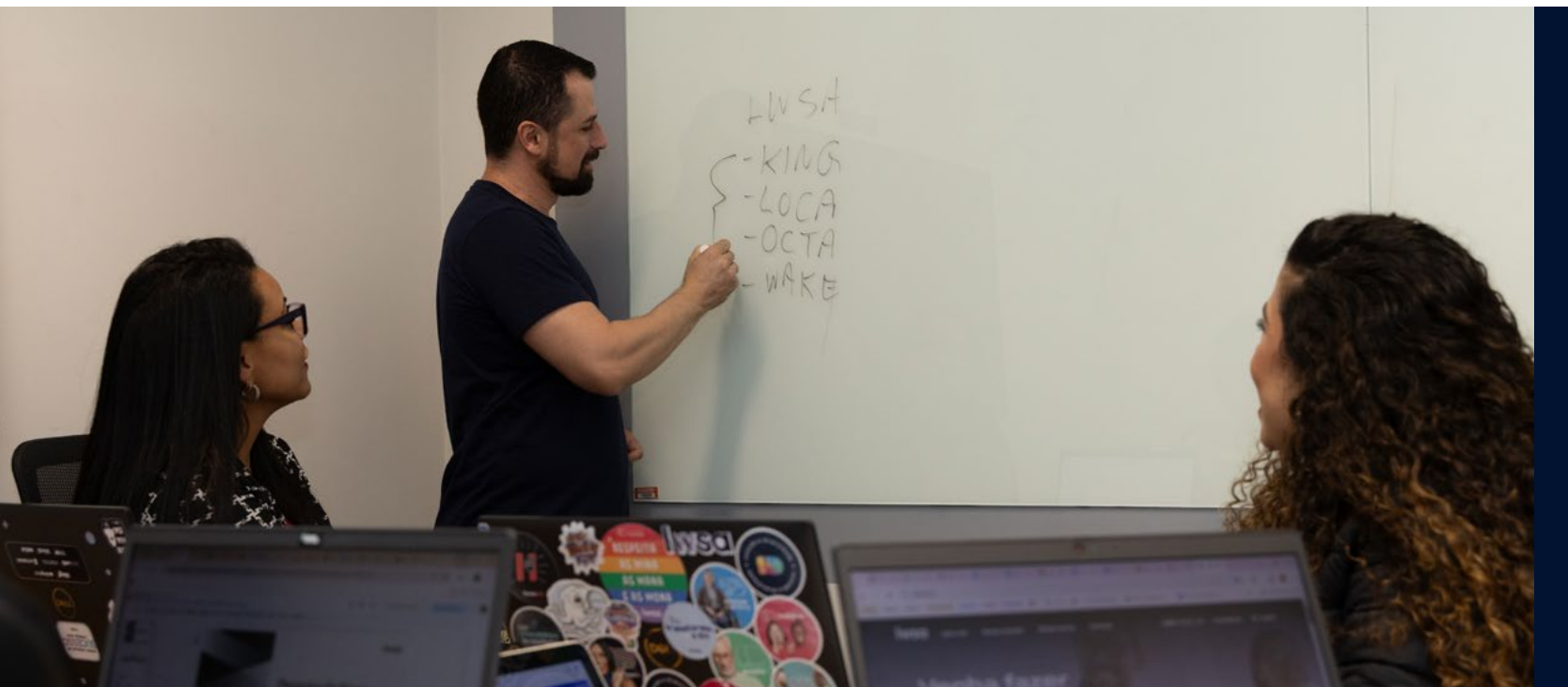
As for Wake, our e-commerce platform for enterprises, in 2024, we moved forward with our strategy for capturing

new customers, bringing in important brands such as Shop2gether, Canal, OQVestir, Blue Man, Adriana Degreas and Inbrands. We are expanding into other omnichannel segments, with customers such as Farma Delivery and Soneda, and we have expanded our sales and service channels, approving more than 30 partner agencies. Furthermore, we have developed an application that integrates several systems into a single solution (Wake U), connecting sales and operations in real time and reinforcing the concept of real unified commerce that

we offer. We now offer fully integrated OMS solutions for our shopkeepers, thus contributing to a more efficient journey at every stage of the sales process.

In the payments and financial solutions segment, in 2024, we obtained approval from Bacen to become a Payment Institution (IP, in Portuguese), with the approval of PagCerto, one of our brands, as an IP. We started offering the digital account product to our customers, another important step on the journey within our ecosystem.

With regard to Black Friday, in 2024, we recorded a 21% growth compared to the previous year. The initiative, initially restricted to one Friday, has expanded to make November a shopping month in anticipation of Christmas, which consumers see as an opportunity because of the deals.



Economic performance

GRI 201-1

We recorded important achievements in 2024: consolidated adjusted EBITDA margin stood at 20.5%, up by 3 p.p. versus 2023. Adjusted EBITDA increased by 24.2% versus 2023, from R\$ 226.6 million to R\$ 881.4 million in 2024.

In the Commerce segment, net operating revenue reached R\$ 950 million in 2024, up by 8.5% from the previous year. On the same comparison basis, net revenue from platform subscriptions grew by 22.3%, due to customer base growth and the expansion of the existing base's ARPU.

Squid's operational and commercial restructuring impacted both the consolidated and the Commerce segment's annual growth. Excluding the effects of Squid from the annual comparison, the Commerce segment's net revenue grew by 15.8% in 2024, compared to 2023.

As regards capital allocation, we distributed more than R\$ 190 million to our shareholders in 2024, through a robust share buyback program – in which 34 million shares, representing 5.7% of LWSA's total shares, were canceled – and dividends paid in November.

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

	2022	2023	2024
Added value for distribution	1,135,391	1,292,756	1,370,032
Net revenue	1,135,391	1,292,756	1,370,032
Economic value distributed	627,600	661,218	727,161
Personnel (salaries and benefits)	421,777	478,748	476,819
Taxes, fees and contributions	205,823	151,655	210,342
Remuneration of third-party capital	0	0	0
Interest on equity and dividends	0	30,815	40,000
Retained economic value	507,791	631,538	642,871

R\$ 281.4 million

in adjusted EBITDA, and a 3 p.p. increase in the consolidated adjusted EBITDA margin.

15.8%

growth in the Commerce segment's net revenue.

Performance by business line

Highlights:

+8.5%

increase in e-commerce
ecosystem revenue in 2024.

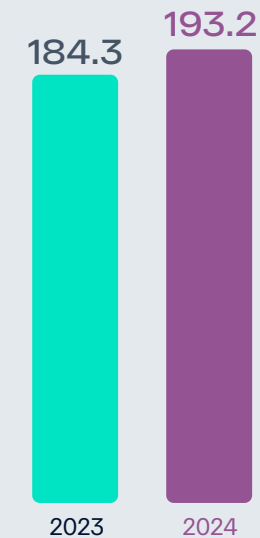
+22.3%

increase in e-commerce
platform subscription
revenue in 2024.

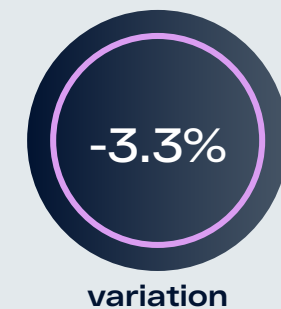
Net operating revenue | R\$ million

	2023	2024	variation
Commerce	875.2	950.0	8.5%
% on consolidated figure	67.7%	69.3	1.6 p.p.
BeOnline / SaaS	417.5	420.0	0.6%
% on consolidated figure	32.3%	30.7	-1.6 p.p.
Net operating revenue - Consolidated	1,292.8	1,370.0	6%

Commerce subscriber base | in thousands



Eop customers – BeOnline/SaaS





APPENDICES

Employees

GRI 2-7

Information on employees by employment contract and gender

	2022			2023			2024		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Permanent employees	2,258	1,588	3,846	2,289	1,524	3,813	2,173	1,411	3,584
Temporary employees	41	5	46	30	3	33	20	2	22
Total	2,299	1,593	3,892	2,319	1,527	3,846	2,193	1,413	3,606

Employees by employment type and gender

	2022			2023			2024		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Employees without guaranteed hours	371	220	591	381	230	611	347	199	546
Full-time employees	1,928	1,373	3,301	1,938	1,297	3,235	1,846	1,214	3,060
Part-time employees	-	-	0	-	-	0	-	-	0
Total	2,299	1,593	3,892	2,319	1,527	3,846	2,193	1,413	3,606

Employees by employment contract and region

	Region	2022	2023	2024
Permanent employees	North	12	19	18
	Northeast	140	146	127
	Midwest	68	56	47
	South	1,197	1,177	1,037
	Southeast	2,428	2,415	2,355
	Abroad	1	1	-
	Total	3,846	3,814	3,584
Temporary employees	North	-	-	-
	Northeast	1	-	-
	Midwest	-	-	-
	South	13	6	3
	Southeast	32	27	19
	Abroad	-	-	-
	Total	46	33	22
Total	North	12	19	18
	Northeast	141	146	127
	Midwest	68	56	47
	South	1,210	1,183	1,040
	Southeast	2,460	2,442	2,374
	Abroad	1	1	0
	Total	3,892	3,846	3,606

Employees by employment type and region

	Region	2022	2023	2024
Employees without guaranteed hours	North	-	-	-
	Northeast	8	8	10
	Midwest	2	3	3
	South	156	173	156
	Southeast	425	427	377
	Abroad	-	-	-
	Total	591	611	546
Full-time employees	North	12	19	18
	Northeast	133	138	117
	Midwest	66	53	44
	South	1,054	1,010	884
	Southeast	2,035	2,014	1,997
	Abroad	1	1	0
	Total	3,301	3,235	3,060

Note: there are no part-time employees.

Employees by employment type and region

	Region	2022	2023	2024
Total	North	12	19	18
	Northeast	141	146	127
	Midwest	68	56	47
	South	1,210	1,183	1,040
	Southeast	2,460	2,441	2,374
	Abroad	1	1	0
	Total	3,892	3,846	3,606



Diversity

GRI 405-1

Percentage of individuals within governance bodies by gender

Gender	2022		2023		2024	
	Total	%	Total	%	Total	%
Men	6	60.0%	6	75.0%	6	75.0%
Women	4	40.0%	2	25.0%	2	25.0%
Total	10	100.0%	8	100.0%	8	100.0%

Percentage of individuals within governance bodies by age group

Age group	2022		2023		2024	
	Total	%	Total	%	Total	%
Under 30 years old	0	0.0%	0	0.0%	0	0.0%
30-50 years old	3	30.0%	3	37.5%	2	25.0%
Over 50 years old	7	70.0%	5	62.5%	6	75.0%
Total	10	100.0%	8	100.0%	8	100.0%

Percentage of individuals within governance bodies, by color or race

Color or race	2022		2023		2024	
	Total	%	Total	%	Total	%
Black	0	0.0%	0	0.0%	0	0.0%
Brown	0	0.0%	0	0.0%	0	0.0%
White	10	100.0%	8	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	10	100.0%	8	100.0%	8	100.0%

Percentage of individuals within governance bodies by People with Disabilities

People with Disabilities	2022		2023		2024	
	Total	%	Total	%	Total	%
People with Disabilities	0	0.0%	0	0.0%	0	0.0%
Persons without disabilities	10	100.0%	8	100.0%	8	100.0%
Total	10	100.0%	8	100.0%	8	100.0%

Percentage of employees per employee category, by gender

Employee category	2022			2023		2024	
	Gender	Total	%	Total	%	Total	%
Board member	Men	7	70.0%	6	75.0%	5	71.4%
	Women	3	30.0%	2	25.0%	2	28.6%
	Total	10	100.0%	8	100.0%	7	100.0%
CEO	Men	1	100.0%	1	100.0%	1	100.0%
	Women	0	0.0%	0	0.0%	0	0.0%
	Total	1	100.0%	1	100.0%	1	100.0%
Vice-chairman	Men	0	0.0%	5	100.0%	7	100.0%
	Women	0	0.0%	0	0.0%	0	0.0%
	Total	0	0.0%	5	100.0%	7	100.0%
Executive officer	Men	60	88.2%	43	84.3%	29	72.5%
	Women	8	11.8%	8	15.7%	11	27.5%
	Total	68	100.0%	51	100.0%	40	100.0%
Manager	Men	137	68.8%	150	68.2%	149	72.0%
	Women	62	31.2%	70	31.8%	58	28.0%
	Total	199	100.0%	220	100.0%	207	100.0%
Technical leader	Men	51	87.9%	43	86.0%	48	90.6%
	Women	7	12.1%	7	14.0%	5	9.4%
	Total	58	100.0%	50	100.0%	53	100.0%
Coordinator	Men	142	54.0%	160	55.7%	151	55.9%
	Women	121	46.0%	127	44.3%	119	44.1%
	Total	263	100.0%	287	100.0%	270	100.0%

Percentage of employees per employee category, by gender

Employee category	2022			2023		2024	
	Gender	Total	%	Total	%	Total	%
Specialist	Men	133	69.3%	159	76.8%	191	73.5%
	Women	59	30.7%	48	23.2%	69	26.5%
	Total	192	100.0%	207	100.0%	260	100.0%
Supervisor	Men	24	48.0%	16	41.0%	5	35.7%
	Women	26	52.0%	23	59.0%	9	64.3%
	Total	50	100.0%	39	100.0%	14	100.0%
Analyst III	Men	246	68.5%	282	70.9%	280	67.3%
	Women	113	31.5%	116	29.1%	136	32.7%
	Total	359	100.0%	398	100.0%	416	100.0%
Analyst II	Men	552	64.8%	565	61.9%	489	63.3%
	Women	300	35.2%	348	38.1%	284	36.7%
	Total	852	100.0%	913	100.0%	773	100.0%
Analyst I	Men	742	57.2%	696	58.0%	561	54.0%
	Women	556	42.8%	503	42.0%	477	46.0%
	Total	1,298	100.0%	1,199	100.0%	1,038	100.0%
Assistant	Men	70	38.7%	84	38.0%	217	56.7%
	Women	111	61.3%	137	62.0%	166	43.3%
	Total	181	100.0%	221	100.0%	383	100.0%

Percentage of employees per employee category, by gender

Employee category	2022			2023		2024	
	Gender	Total	%	Total	%	Total	%
Auxiliary	Men	60	28.4%	45	40.2%	11	22.4%
	Women	151	71.6%	67	59.8%	38	77.6%
	Total	211	100.0%	112	100.0%	49	100.0%
Intern	Men	55	54.5%	38	48.7%	28	58.3%
	Women	46	45.5%	40	51.3%	20	41.7%
	Total	101	100.0%	78	100.0%	48	100.0%
Apprentice	Men	19	38.8%	26	45.6%	21	52.5%
	Women	30	61.2%	31	54.4%	19	47.5%
	Total	49	100.0%	57	100.0%	40	100.0%
Total	Men	2,299	59.1%	2,312	60.3%	2,193	60.8%
	Women	1,593	40.9%	1,525	39.7%	1,413	39.2%
	Overall total	3,892	100.0%	3,837	100.0%	3,606	100.0%



Percentage of employees per employee category, by age group

Employee category	2022			2023		2024	
	Age group	Total	%	Total	%	Total	%
Board member	Under 30 years old	0	0.0%	0	0.0%	0	0.0%
	30-50 years old	3	30.0%	3	37.5%	2	28.6%
	Over 50 years old	7	70.0%	5	62.5%	5	71.4%
	Total	10	100.0%	8	100.0%	7	100.0%
CEO	Under 30 years old	0	0.0%	0	0.0%	0	0.0%
	30-50 years old	1	100.0%	0	0.0%	0	0.0%
	Over 50 years old	0	0.0%	1	100.0%	1	100.0%
	Total	1	100.0%	1	100.0%	1	100.0%
Vice-chairman	Under 30 years old	0	0.0%	0	0.0%	0	0.0%
	30-50 years old	0	0.0%	4	80.0%	6	85.7%
	Over 50 years old	0	0.0%	1	20.0%	1	14.3%
	Total	0	0.0%	5	100.0%	7	100.0%
Executive officer	Under 30 years old	3	4.4%	0	0.0%	0	0.0%
	30-50 years old	59	86.8%	43	84.3%	33	82.5%
	Over 50 years old	6	8.8%	8	15.7%	7	17.5%
	Total	68	100.0%	51	100.0%	40	100.0%
Manager	Under 30 years old	24	12.1%	21	9.6%	10	4.8%
	30-50 years old	166	83.4%	188	85.5%	186	89.9%
	Over 50 years old	9	4.5%	11	5.0%	11	5.3%
	Total	199	100.0%	220	100.0%	207	100.0%
Technical leader	Under 30 years old	13	22.4%	8	16.0%	8	15.1%
	30-50 years old	45	77.6%	42	84.0%	44	83.0%
	Over 50 years old	0	0.0%	0	0.0%	1	1.9%
	Total	58	100.0%	50	100.0%	53	100.0%

Percentage of employees per employee category, by age group

Employee category	2022			2023		2024	
	Age group	Total	%	Total	%	Total	%
Coordinator	Under 30 years old	64	24.3%	69	24.0%	50	18.5%
	30-50 years old	192	73.0%	213	74.2%	217	80.4%
	Over 50 years old	7	2.7%	5	1.7%	3	1.1%
	Total	263	100.0%	287	100.0%	270	100.0%
Specialist	Under 30 years old	44	550.0%	50	24.1%	56	21.5%
	30-50 years old	143	1,787.5%	153	73.9%	200	76.9%
	Over 50 years old	5	62.5%	4	1.9%	4	1.5%
	Total	192	2,400.0%	207	100.0%	260	100.0%
Supervisor	Under 30 years old	26	520.0%	17	43.6%	6	42.9%
	30-50 years old	24	480.0%	22	56.4%	8	57.1%
	Over 50 years old	0	0.0%	0	0.0%	0	0.0%
	Total	50	1,000.0%	39	100.0%	14	100.0%
Analyst III	Under 30 years old	128	35.6%	141	35.4%	128	30.8%
	30-50 years old	230	64.1%	254	63.8%	286	68.8%
	Over 50 years old	1	0.3%	3	0.8%	2	0.5%
	Total	359	100.0%	398	100.0%	416	100.0%
Analyst II	Under 30 years old	468	54.9%	497	54.4%	365	47.2%
	30-50 years old	381	44.7%	412	45.1%	401	51.9%
	Over 50 years old	3	0.4%	4	0.4%	7	0.9%
	Total	852	100.0%	913	100.0%	773	100.0%
Analyst I	Under 30 years old	867	66.8%	761	63.5%	613	59.1%
	30-50 years old	425	32.7%	426	35.5%	419	40.4%
	Over 50 years old	6	0.5%	12	1.0%	6	0.6%
	Total	1,298	100.0%	1,199	100.0%	1,038	100.0%

Percentage of employees per employee category, by age group

Employee category	2022			2023		2024	
	Age group	Total	%	Total	%	Total	%
Assistant	Under 30 years old	132	72.9%	146	66.1%	270	70.5%
	30-50 years old	48	26.5%	73	33.0%	108	28.2%
	Over 50 years old	1	0.5%	2	0.9%	5	1.3%
	Total	181	100.0%	221	100.0%	383	100.0%
Auxiliary	Under 30 years old	140	66.3%	68	60.7%	27	55.1%
	30-50 years old	62	29.4%	36	32.1%	15	30.6%
	Over 50 years old	9	4.3%	8	7.1%	7	14.3%
	Total	211	100.0%	112	100.0%	49	100.0%
Intern	Under 30 years old	91	90.1%	70	89.7%	44	91.7%
	30-50 years old	10	9.9%	8	10.3%	4	8.3%
	Over 50 years old	0	0.0%	0	0.0%	0	0.0%
	Total	101	100.0%	78	100.0%	48	100.0%
Apprentice	Under 30 years old	49	100.0%	57	100.0%	40	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	49	100.0%	57	100.0%	40	100.0%
Total	Under 30 years old	2,049	53.4%	1,905	49.6%	1,617	44.8%
	30-50 years old	1,789	46.6%	1,874	48.8%	1,929	53.5%
	Over 50 years old	54	1.4%	58	1.5%	60	1.7%
	Overall total	3,892	101.4%	3,837	100.0%	3,606	100.0%

Employee percentage per employee category, color or race

Employee category	2022			2023		2024	
	Color or race	Total	%	Total	%	Total	%
Board member	Black	0	0.0%	0	0%	0	0.0%
	Brown	0	0.0%	0	0%	0	0.0%
	White	10	100.0%	8	100%	7	100.0%
	Indigenous people	0	0.0%	0	0%	0	0.0%
	Yellow	0	0.0%	0	0%	0	0.0%
	Total	10	100.0%	8	100%	7	100.0%
CEO	Black	0	0.0%	0	0%	0	0.0%
	Brown	0	0.0%	0	0%	0	0.0%
	White	1	100.0%	1	100%	1	100.0%
	Indigenous people	0	0.0%	0	0%	0	0.0%
	Yellow	0	0.0%	0	0%	0	0.0%
	Total	1	100.0%	1	100%	1	100.0%
Vice-chairman	Black	0	0.0%	0	0%	0	0.0%
	Brown	0	0.0%	0	0%	0	0.0%
	White	0	0.0%	5	100%	6	85.7%
	Indigenous people	0	0.0%	0	0%	0	0.0%
	Yellow	0	0.0%	0	0%	1	14.3%
	Total	0	0.0%	5	100%	7	100.0%
Executive officer	Black	0	0.0%	0	0%	1	2.5%
	Brown	3	4.8%	3	5.88%	1	2.5%
	White	60	95.2%	43	84.31%	35	87.5%
	Indigenous people	0	0.0%	0	0%	0	0.0%
	Yellow	5	8%	5	9.8%	3	7.5%
	Total	63	100.0%	51	100%	40	100.0%

Employee percentage per employee category, color or race

Employee category	2022			2023		2024	
	Color or race	Total	%	Total	%	Total	%
Manager	Black	8	4.1%	10	4.55%	7	3.4%
	Brown	22	11.2%	25	11.36%	26	12.6%
	White	166	84.7%	180	81.82%	168	81.2%
	Indigenous people	0	0.0%	0	0%	0	0.0%
	Yellow	3	1.5%	5	2.27%	6	2.9%
	Total	196	100.0%	220	100%	207	100.0%
Technical leader	Black	2	3.6%	3	6%	0	0.0%
	Brown	5	9.1%	10	20%	7	13.2%
	White	48	87.3%	34	68%	44	83.0%
	Indigenous people	0	0.0%	0	0%	0	0.0%
	Yellow	3	5.5%	3	6%	2	3.8%
	Total	55	100.0%	50	100%	53	100.0%
Coordinator	Black	11	4.3%	9	3.14%	11	4.1%
	Brown	38	14.8%	39	13.59%	53	19.6%
	White	208	80.9%	234	81.53%	205	75.9%
	Indigenous people	1	0.4%	0	0%	0	0.0%
	Yellow	5	1.9%	5	1.74%	1	0.4%
	Total	257	100.0%	287	100%	270	100.0%
Specialist	Black	8	4.2%	8	3.86%	8	3.1%
	Brown	35	18.4%	40	19.32%	40	15.7%
	White	147	77.4%	156	75.36%	205	80.7%
	Indigenous people	0	0.0%	0	0%	0	0.0%
	Yellow	2	1.1%	3	1.45%	1	0.4%
	Total	190	100.0%	207	100%	254	100.0%

Employee percentage per employee category, color or race

Employee category	2022			2023		2024	
	Color or race	Total	%	Total	%	Total	%
Supervisor	Black	1	2.0%	1	2.56%	0	0.0%
	Brown	5	10.2%	3	7.69%	0	0.0%
	White	43	87.8%	35	89.74%	14	100.0%
	Indigenous people	0	0.0%	0	0%	0	0.0%
	Yellow	1	2.0%	0	0%	0	0.0%
	Total	49	100.0%	39	100%	14	100.0%
Analyst III	Black	22	6.2%	25	6.28%	27	6.5%
	Brown	61	17.2%	90	22.61%	86	20.7%
	White	271	76.5%	276	69.35%	292	70.2%
	Indigenous people	1	0.3%	2	0.5%	3	0.7%
	Yellow	4	1.1%	5	1.26%	8	1.9%
	Total	354	100.0%	398	100%	416	100.0%
Analyst II	Black	71	8.5%	90	9.86%	55	7.1%
	Brown	157	18.7%	177	19.39%	155	20.1%
	White	610	72.8%	634	69.44%	549	71.0%
	Indigenous people	4	0.5%	4	0.44%	2	0.3%
	Yellow	10	1.2%	8	0.88%	12	1.6%
	Total	838	100.0%	913	100%	773	100.0%
Analyst I	Black	98	7.6%	92	7.67%	83	8.0%
	Brown	285	22.2%	260	21.68%	228	22.0%
	White	900	70.2%	827	68.97%	712	68.6%
	Indigenous people	1	0.1%	2	0.17%	2	0.2%
	Yellow	14	1.1%	18	1.5%	13	1.3%
	Total	1,283	100.0%	1,199	100%	1,038	100.0%

Employee percentage per employee category, color or race

Employee category	2022			2023		2024	
	Color or race	Total	%	Total	%	Total	%
Assistant	Black	22	12.2%	31	14.03%	41	10.7%
	Brown	56	31.1%	63	28.51%	139	36.3%
	White	102	56.7%	125	56.56%	201	52.5%
	Indigenous people	1	0.6%	1	0.45%	2	0.5%
	Yellow	0	0.0%	1	0.45%	0	0.0%
	Total	180	100.0%	221	100%	383	100.0%
Auxiliary	Black	20	9.5%	18	16.07%	6	12.2%
	Brown	50	23.7%	29	25.89%	10	20.4%
	White	141	66.8%	65	58.04%	33	67.3%
	Indigenous people	0	0.0%	0	0%	0	0.0%
	Yellow	0	0.0%	0	0%	0	0.0%
	Total	211	100.0%	112	100%	49	100.0%
Intern	Black	7	7.1%	7	8.97%	4	8.3%
	Brown	22	22.2%	11	14.1%	11	22.9%
	White	70	70.7%	60	76.92%	32	66.7%
	Indigenous people	1	1.0%	0	0%	0	0.0%
	Yellow	1	1.0%	0	0%	1	2.1%
	Total	99	100.0%	78	100%	48	100.0%

Employee percentage per employee category, color or race

Employee category	2022			2023		2024	
	Color or race	Total	%	Total	%	Total	%
Apprentice	Black	5	10.2%	9	15.79%	5	12.5%
	Brown	11	22.4%	9	15.79%	11	27.5%
	White	33	67.3%	39	68.42%	24	60.0%
	Indigenous people	-	0.0%	0	0%	0	0.0%
	Yellow	-	0.0%	0	0%	0	0.0%
	Total	49	100.0%	57	100%	40	100.0%
Total	Black	275	7.1%	303	7.9%	248	6.9%
	Brown	750	19.3%	759	19.8%	767	21.3%
	White	2,810	72.2%	2,713	70.7%	2,528	70.1%
	Indigenous people	9	0.2%	9	0.2%	10	0.3%
	Yellow	48	1.2%	53	1.4%	53	1.5%
	Overall total	3,892	100%	3,837	100%	3,606	100.0%

Percentage of employees per employee category, per people with disabilities

Employee category	2022			2023		2024	
	People with disabilities	Total	%	Total	%	Total	%
Board member	People with disabilities	0	0.0%	0	0.0%	0	0.0%
	People without disabilities	10	100.0%	8	100.0%	7	100.0%
	Total	10	100.0%	8	100.0%	7	100.0%
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%
	Total	1	100.0%	1	100.0%	1	100.0%

Percentage of employees per employee category, per people with disabilities

Employee category	2022			2023		2024	
	People with disabilities	Total	%	Total	%	Total	%
Vice-chairman	People with disabilities	0	0.0%	0	0.0%	0	0.0%
	People without disabilities	0	0.0%	5	100.0%	7	100.0%
	Total	0	0.0%	5	100.0%	7	100.0%
Executive officer	People with disabilities	0	0.0%	0	0.0%	0	0.0%
	People without disabilities	68	100.0%	51	100.0%	40	100.0%
	Total	68	100.0%	51	100.0%	40	100.0%
Manager	People with disabilities	2	1.0%	2	0.9%	3	1.4%
	People without disabilities	197	99.0%	218	99.1%	204	98.6%
	Total	199	100.0%	220	100.0%	207	100.0%
Technical leader	People with disabilities	1	1.7%	1	2.0%	0	0.0%
	People without disabilities	57	98.3%	49	98.0%	53	100.0%
	Total	58	100.0%	50	100.0%	53	100.0%
Coordinator	People with disabilities	0	0.0%	2	0.7%	2	0.7%
	People without disabilities	263	100.0%	285	99.3%	268	99.3%
	Total	263	100.0%	287	100.0%	270	100.0%

Percentage of employees per employee category, per people with disabilities

Employee category	2022			2023		2024	
	People with disabilities	Total	%	Total	%	Total	%
Specialist	People with disabilities	0	0.0%	1	0.5%	1	0.4%
	People without disabilities	192	100.0%	206	99.5%	259	99.6%
	Total	192	100.0%	207	100.0%	260	100.0%
Supervisor	People with disabilities		0.0%		0.0%	0	0.0%
	People without disabilities	50	100.0%	39	100.0%	14	100.0%
	Total	50	100.0%	39	100.0%	14	100.0%
Analyst III	People with disabilities	3	0.84%	3	0.75%	4	1.0%
	People without disabilities	356	99.16%	395	99.3%	412	99.0%
	Total	359	100.0%	398	100.0%	416	100.0%
Analyst II	People with disabilities	9	1.1%	14	1.5%	16	2.1%
	People without disabilities	843	98.9%	899	98.5%	757	97.9%
	Total	852	100.0%	913	100.0%	773	100.0%
Analyst I	People with disabilities	42	3.2%	42	3.5%	44	4.2%
	People without disabilities	1,256	96.8%	1,157	96.5%	994	95.8%
	Total	1,298	100.0%	1,199	100.0%	1,038	100.0%

Percentage of employees per employee category, per people with disabilities

Employee category	2022			2023		2024	
	People with disabilities	Total	%	Total	%	Total	%
Assistant	People with disabilities	5	2.8%	12	5.4%	15	3.9%
	People without disabilities	176	97.2%	209	94.6%	368	96.1%
	Total	181	100.0%	221	100.0%	383	100.0%
Auxiliary	People with disabilities	15	7.1%	12	10.7%	11	22.4%
	People without disabilities	196	92.9%	100	89.3%	38	77.6%
	Total	211	100.0%	112	100.0%	49	100.0%
Intern	People with disabilities	0	0.0%	0	0.0%	0	0.0%
	People without disabilities	101	100.0%	78	100.0%	48	100.0%
	Total	101	100.0%	78	100.0%	48	100.0%
Apprentice	People with disabilities	1	2.0%	1	1.8%	0	0.0%
	People without disabilities	48	98.0%	56	98.3%	40	100.0%
	Total	49	100.0%	57	100.0%	40	100.0%
Total	People with disabilities	47	1.2%	78	2.0%	96	2.7%
	People without disabilities	3,804	98.8%	3,748	98.0%	3,510	97.3%
	Overall total	3,851	100.0%	3,826	100.0%	3,606	100.0%

Note: the figures previously reported did not include family members, however, due to a strategic decision, it was agreed that we should start considering them in this sample. Therefore, there is a variation of four people in relation to the published report and the data in this spreadsheet.

GHG emissions

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

Total GHG emissions, by scope (tCO₂e)

Scope	Category	2022	2023	2024
Scope 1 ¹	Stationary combustion	88.85	100.52	140.36
	Mobile combustion	6.95	23.68	1.49
	Fugitive emissions	26.40	58.07	107.53
	Total	122.20	182.274	249.38
Scope 2 ²	Electricity	703.50	611.76	848.68
	Total	703.50	611.76	848.68
Scope 3 ³	Upstream transportation	-	-	1,000.06
	Waste from operations	-	10.24	28.35
	Business travel	-	313.31	443.26
	Emissions from commuting	-	619.74	588.32
	Leased assets (the organization as the lessee)	-	-	3.17
	Total	-	943.29	2,063.16

Notes:
¹Gases included in the calculation: CO₂, CH₄, N₂O and HFCs. Total biogenic CO₂ emissions was 23.94 tCO₂e.
²Gases included in the calculation: CO₂, CH₄ and N₂O.
³Gases 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) was used as GWP source.

Total biogenic GHG emissions, by scope (tCO₂e)

Scope	Category	2022	2023	2024
Scope 1	Stationary combustion	8.97	11.71	20.62
	Mobile combustion	5.87	12.23	0.89
Scope 3	Upstream transportation	-	-	145.59
	Business travel	-	4.40	4.82
	Emissions from commuting	-	234.24	152.97



GRI CONTENT INDEX

GRI Content Index

Declaration of use LWSA reported based on GRI Standards for the period January 1, 2024 to December 31, 2024

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	7			
	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	The company reports that no restatements of information made in previous reporting periods were performed.			
	2-5	External assurance	3			
Activities and workers						
GRI 2: General Disclosures 2021	2-6	Activities, value chain and other business relationships	10, 82	2-6 b iii) 2-6 c) 2-6 d)	Not applicable	
	2-7	Employee information	60, 75, 104	2-7 c) 2-7 d) 2-7 e)	Not applicable	
	2-8	Workers who are not employees	60, 75			
Governance						
GRI 2: General Disclosures 2021	2-9	Governance structure and composition	21, 24, 28, 29, 30, 31, 32	2-9-c vi)	Not applicable	
	2-10	Nomination and selection of the highest governance body	21, 24	2-11 b)	Not applicable	
	2-11	Chair of the highest governance body	21, 24			
	2-12	Role of the highest governance body in overseeing the management of impacts	21, 24, 26, 27			

GRI standard	Content		Page/answer	Omission		
				Omitted requirements	Reason	Explanation
Governance						
GRI 2: General Disclosures 2021	2-13	Delegation of responsibility for managing impacts	21, 24	2-13-a ii)	Not applicable	Although management has the support of other leaders among its staff, responsibility for managing the business and its impacts lies with the above-mentioned bodies.
	2-15	Conflicts of interest	37			
	2-16	Communication of critical concerns	21, 24, 26			
	2-17	Collective knowledge of the highest governance body	21, 24			
	2-18	Evaluation of the performance of the highest governance body	21, 25			
	2-19	Remuneration policies	33			
	2-20	Process to determine remuneration	33	2-20-a iii) 2-20 b)	Not applicable	There are no compensation consultants involved in decisions and strategies regarding positions and salaries. This is done internally by the team in accordance with business guidelines and strategy.
						There is no voting on policies and proposals. Documents are validated by executives in the People, Culture, and ESG areas.
	2-21	Annual total compensation ratio	34	2-21 a) 2-21 b) 2-21 c)	Confidentiality	The annual remuneration of the highest-paid individual in the organization is reported in the Reference Form. For confidentiality reasons, individual data will not be disclosed in comparison with the structure of other employees in the Company.

GRI standard	Content		Page/answer	Omission		
				Omitted requirements	Reason	Explanation
Strategy, policies and practices						
GRI 2: General Disclosures 2021	2-22	Statement on sustainable development strategy				The Company does not hold a significant stake in any advocacy associations or organizations.
	2-23	Policy commitments				
	2-24	Embedding policy commitments				
	2-25	Processes to remediate negative impacts				
	2-26	Mechanisms for seeking advice and raising concerns				
	2-27	Compliance with laws and regulations				
	2-28	Membership associations	2-28	Not applicable		
Stakeholder engagement						
GRI 2: General Disclosures 2021	2-29	Approach to stakeholder engagement	58			
	2-30	Collective bargaining agreements	68			
Material Topics						
GRI 3: Material Topics 2021	3-1	Process to determine material topics	11, 15			
	3-2	List of material topics	11, 15			
Corporate governance and compliance						
GRI 3: Material Topics 2021	3-3	Management of material topics	20, 37	205-3	Not applicable	LWSA has not had any confirmed cases of corruption involving employees, business partners, or legal proceedings brought against the organization or its employees.
GRI 205: Anti-corruption 2016	205-2	Communication and training about anti-corruption policies and procedures	37, 44, 46			
		Confirmed incidents of corruption and actions taken	37			
Information security						
GRI 3: Material Topics 2021	3-3	Management of material topics	48	3-3 d) 3-3 e) 3-3 f)	Confidentiality	
GRI 418: Customer Privacy	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	51, 52			

GRI standard	Content		Page/answer	Omission		
				Omitted requirements	Reason	Explanation
Customer experience						
GRI 3: Material Topics 2021	3-3	Management of material topics	81, 82			
Innovation and technology						
GRI 3: Material Topics 2021	3-3	Management of material topics	55			
Employee journey						
GRI 3: Material Topics 2021	3-3	Management of material topics	60			
GRI 401: Employment 2016	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	68			
GRI 404: Training and Education 2016	404-1	Average hours of training per year per employee	69			
	404-2	Programs for upgrading employee skills and transition assistance programs	69			
GRI 405: Diversity and Equal Opportunity 2016	405-1	Diversity of governance bodies and employess	36, 75, 107			
Extra disclosures - indicators not included in the materiality report, but reported to maintain historical series and comparability						
GRI 201: Economic Performance 2016	201-1	Direct economic value generated and distributed	101			
GRI 302: Energy 2016	302-1	Energy consumption within the organization	90			
	302-4	Reduction of energy consumption	90			
	GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions			
305-2		Energy indirect (Scope 2) GHG emissions	92, 122			
GRI 403: Occupational Health and Safety 2018	403-1	Occupational health and safety management system	79			
	403-2	Hazard identification, risk assessment, and incident investigation	79			
	403-4	Worker participation, consultation, and communication on occupational health and safety	79			
	403-5	Worker training on occupational health and safety	79			

External Assurance



INDEPENDENT AUDITOR'S LIMITED ASSURANCE REPORT ON THE NON-FINANCIAL INFORMATION INCLUDED IN THE SUSTAINABILITY REPORT FOR 2024

To the
Management and other interested parties of
Locaweb Serviços de Internet S.A.
São Paulo - SP

Introduction

We were engaged by **Locaweb Serviços de Internet S.A.** (“**Locaweb**” or “**Company**”) to present our limited assurance report on the information included in the 2024 Sustainability Report for the period between January 01 and December 31, 2024.

Our limited assurance does not extend to information from prior periods or to any other information disclosed along with the mentioned report, including any embedded images, audio or videos files.

Management's responsibility

The Management of **Locaweb Serviços de Internet S.A.** is responsible for:

- (a) Selecting and establishing adequate criteria for the preparation of the information included in the Sustainability Report for 2024;
- (b) Preparing the information according to the criteria and guidelines of the Global Reporting Initiative (GRI Standards 2021);
- (c) Designing, implementing and maintaining internal controls on the information relevant to the preparation of the information included in the Sustainability Report for 2024, which is free from material misstatement, whether due to fraud or error.

Independent auditor's responsibilities

Our responsibility is to express a conclusion on the non-financial information included in **Locaweb's** 2024 Sustainability Report, based on the limited assurance engagement performed according to Technical Notice CTO No. 07/2022 - Orientation to Independent Auditors for limited assurance report engagements on non-financial information issued by the Brazilian Federal Council of Accounting (CFC), and to Standard NBC TO 3000 - Assurance Engagements Other than Audit and Review, also issued by CFC, which is equivalent to ISAE 3000 - Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board (IAASB). These standards require that we comply with ethical, independence and other related requirements, including the Brazilian Quality Control Standard (NBC PA 01), and therefore, that we maintain a comprehensive quality control system, with documentation of policies and procedures adopted for complying with ethical requirements, professional standards and applicable legal and regulatory requirements.

Additionally, they require that the engagement be performed to obtain limited assurance as to whether the non-financial information included in **Locaweb's** 2024 Sustainability Report, taken as a whole, is free from material misstatement.

A limited assurance engagement performed in accordance with NBC TO 3000 (ISAE 3000) mainly consists of making enquiries of **Locaweb's** Management and other professionals of the Company responsible for preparing the information and applying analytical procedures to obtain evidence that allow us to conclude on the limited assurance of the information taken as a whole. A limited assurance engagement also requires the adoption of additional procedures if the independent auditors become aware of matters that lead them to believe that the information disclosed in the 2024 Sustainability Report, taken as a whole, is not free from material misstatement.

The procedures selected were based on our understanding of aspects related to the gathering, materiality, and presentation of the information disclosed in the Company's 2024 Sustainability Report and other circumstances of the engagement, as well as on our understanding of areas and processes associated with material information disclosed in that report that may not be free from material misstatement. The procedures included, among others:

- (a) Planning of the engagement, considering the relevance and volume of quantitative and qualitative information, and the operating and internal control systems used as basis for the preparation of the information disclosed in the 2024 Sustainability Report;
- (b) Gaining an understanding of the calculation methodology and procedures adopted for gathering indicators by means of interviews with the managers responsible for preparing the information;
- (c) Adoption of analytical procedures for assessing the quantitative and qualitative information and its correlation with the indicators disclosed in the 2024 Sustainability Report;
- (d) For the cases in which non-financial data are correlated with financial indicators, crosschecking of the financial indicators with financial statements and/or accounting records.

The limited assurance engagement also included assessing compliance with the guidelines and criteria laid out in the Global Reporting Initiative Standards (GRI Standards 2021).

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our limited conclusion.

Scope and limitations

The procedures adopted in preparing the limited assurance report vary in nature and timing and are substantially more limited in scope than those applied in a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than that which would have been obtained if a reasonable assurance engagement had been carried out. Had we performed a reasonable assurance engagement, we could have identified other issues and possible misstatement of information disclosed in **Locaweb's** 2024 Sustainability Report. Accordingly, we do not express an opinion on this information.

Non-financial data are subject to a greater number of inherent limitations compared to financial data due to the nature and diversity of methods used to determine, calculate or estimate them. Qualitative interpretations of the materiality, relevance and accuracy of the data are subject to individual assumptions and judgments. Additionally, we did not assess data from prior periods, nor future projections and targets.

The non-financial information was prepared and presented according to the criteria presented above, and is thus not intended to ensure compliance with social, economic, environmental or engineering laws and regulations. Nonetheless, these standards provide for the presentation and disclosure of possible non-compliance with such regulations when subject to significant fines or sanctions. Our assurance report must be read and understood in this context, pursuant to the selected and mentioned criteria.

Conclusion

Based on the procedures adopted and described in the present report and on evidence obtained, nothing has come to our attention that would make us believe that the non-financial information disclosed in the 2024 Sustainability Report of **Locaweb** for the period from January 01 to December 31, 2024, was not gathered, in all material respects, in accordance with the criteria and guidelines laid out in GRI Standards 2021.

São Paulo, August 12, 2025.

BDO
BDO-RCS Auditores Independentes SS Ltda.
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