

d-local

dLocal Limited Modern Slavery and Human Trafficking Statement

For the year ending 31 December 2025

A. INTRODUCTION

dLocal Limited (Cayman Islands) (the “Group” or “dLocal”) is committed to conducting business ethically, lawfully and with respect for fundamental human rights, and to fostering a culture of transparency and accountability. Our position is clear: we will not tolerate modern slavery in any form and we will not knowingly engage with any party that benefits from or facilitates it.

This Modern Slavery and Human Traffic Statement (the “Statement”) sets out the steps the dLocal Group has taken, and plans to take, to identify, prevent and address the risks of modern slavery and human trafficking in its operations and value chain, with a particular focus on the United Kingdom and the activities of dLocal OpCo UK Limited (“dLocal UK”), the Group’s principal FCA-authorised UK operating entity.

This Statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 for the financial year ending on 31 December 2025. It has been approved by the Board of Directors of dLocal on the date indicated below and has been signed on behalf of the Board.

B. ORGANISATIONAL STRUCTURE

dLocal is a global payments technology group that enables merchants to accept payments, send payouts and settle funds across emerging markets. The group is headed by dLocal, a Cayman-incorporated company listed on Nasdaq, and operates through regulated and operating entities in multiple jurisdictions, including the United Kingdom and other key markets. The group serves merchants in more than 60 emerging markets, with operations focused on Latin America, Africa and Asia.

dLocal OpCo UK Limited (“dLocal UK”) is an authorised payment institution supervised by the Financial Conduct Authority and forms part of this wider group. It is a services-based entity with a comparatively small headcount, operating from the United Kingdom and supported by functions across the group. dLocal UK’s core business is providing cross-border payment and related services to enterprise merchants, financial institutions and other partners, enabling them to accept customer payments (“pay-ins”) and make payouts to counterparties in multiple emerging markets.

In addition to dLocal UK, the Group's other United Kingdom entities are dLocal Corp LLP and dLocal LLP. This Statement is made on behalf of dLocal and its subsidiaries worldwide, including these UK entities. A full list of dLocal's subsidiaries is set out in dLocal's most recent Annual Report on Form 20-F, filed with the U.S. Securities and Exchange Commission and available on dLocal's investor relations website.

dLocal engages with global enterprise merchants and other corporate customers that use the dLocal platform for pay-ins and pay-outs across Latin America, Africa and Asia, as well as local payment partners and other financial institutions (such as payment service providers, banks and acquirers) that connect dLocal to domestic payment rails in emerging markets. DLocal also works with external third-party service providers that are onboarded and monitored under the Group Third-Party Risk Management Framework and Third-Party Due Diligence Procedure. In addition, dLocal relies on a range of corporate support suppliers for dLocal's offices and operations, which are engaged in line with the Group's Procurement Policy and Procurement Guidelines.

C. HOW DLOCAL ADDRESSES MODERN SLAVERY AND HUMAN TRAFFICKING

dLocal is firmly committed to conducting business in a manner that respects and promotes fundamental human rights and to maintaining a zero-tolerance approach to all forms of modern slavery, human trafficking, forced or compulsory labour, and any practice that amounts to exploitation or abuse of power over vulnerable individuals.

Consistent with applicable laws and international standards, including the UK Modern Slavery Act 2015 and widely recognised human-rights principles, dLocal's modern-slavery framework focuses on:

- identifying, preventing and mitigating modern-slavery risks in dLocal's own operations and, to the extent reasonably possible, across dLocal's value chain, using a risk-based and proportionate approach;
- acting ethically and with integrity in dLocal's business relationships, including by embedding expectations into dLocal's Code of Ethics and Business Conduct and related policies;
- promoting safe and fair working conditions for people who work for or on behalf of dLocal, whether as employees, contractors, consultants or through third-party arrangements; and
- using dLocal's leverage with suppliers and partners to encourage alignment

with dLocal's standards and with applicable labour and human-rights laws.

dLocal's current approach to preventing modern slavery is underpinned by a wider set of group-wide and local policies that apply to people who work for or on behalf of dLocal, and to relevant suppliers and third parties across dLocal's value chain, particularly those that might be assessed as business-critical or higher risk.

These include, among others, the Group Code of Ethics and Business Conduct, the Group Modern Slavery Policy, the Group Anti-Corruption Policy, the Global AML/CTF Policy, the Group Whistleblowing Policy and Channel, the Group Procurement Policy, the Outsourcing & Third-Party Management Policy, and the dLocal Ltd Complaints Handling Policy. Together, these policies set expectations on conduct, human rights, labour standards, supplier behaviour and reporting of concerns across dLocal's operations and value chain.

Across this policy framework, dLocal seeks to ensure that:

- employees and others acting on behalf of dLocal comply with a clear Code of Ethics and Business Conduct, covering integrity, respect for human rights, anti-harassment and routes for raising concerns;
- suppliers and other third parties comply with supplier and third-party standards embedded in dLocal's Procurement, Outsourcing & Third-Party Management and Third-Party Due Diligence procedures, including expectations on lawful employment practices, prohibition of forced or compulsory labour and respect for fundamental labour rights;
- recruitment and employment practices prohibit the use of forced, bonded or child labour, prohibit worker-paid recruitment fees, and require written terms of employment that comply with applicable labour law, including minimum wage and working-time protections;
- workers have freedom to terminate employment in line with legal and contractual requirements, freedom of movement, and are not subjected to threats of violence, harassment or intimidation;
- dLocal maintains accessible speak-up and remediation channels, including a 24/7 [Whistleblowing Channel](#) (confidential and, where permitted by law, anonymous) and customer-facing complaints processes, so that concerns can be raised and investigated and, where appropriate, victims or survivors of modern slavery can be supported and remediation pursued.

D. SUPPLY CHAINS AND RISK ASSESSMENT

dLocal's business model is primarily technology- and services-driven, rather than reliant on large-scale manufacturing or commodity supply chains, which are often associated with higher inherent modern-slavery risks. However, dLocal recognises that modern slavery can still arise in financial-services and technology value chains.

dLocal's key supply-chain and third-party relationships include technology and cloud-infrastructure providers, payment and banking partners, professional-services and advisory firms, recruitment and people-related service providers, and facilities and office-support suppliers. dLocal expects all suppliers, outsourcers and business partners who provide goods or services to dLocal, to act in a manner consistent with dLocal's Modern Slavery Policy, Code of Ethics and related group policies, including avoiding any form of forced or compulsory labour and complying with applicable labour and human-rights laws. dLocal will not support or deal with any business that dLocal knows is involved in slavery, human trafficking or related practices in any part of its operations or supply chain.

dLocal assesses modern-slavery risk using a risk-based lens that takes into account factors such as sector, geography, type of service and business model. In practice, dLocal focuses more closely on labour-intensive services, higher-risk jurisdictions and arrangements that may involve complex subcontracting chains or the use of labour intermediaries. These factors are built into dLocal's risk-based assessment of suppliers and other third parties and are considered across the lifecycle of key relationships – from initial engagement and due diligence, through contracting and ongoing monitoring, to renewal or exit – as further described in dLocal's due-diligence processes below.

E. DUE DILIGENCE PROCESSES FOR MODERN SLAVERY AND HUMAN TRAFFICKING

As part of dLocal's efforts to identify and mitigate modern-slavery risks, dLocal applies due-diligence processes to both its own operations and its supply chains. These processes are integrated into dLocal's frameworks and are being further developed over time as dLocal's risk profile and regulatory expectations evolve.

Within dLocal's own operations, dLocal seeks to ensure that people who work for or on behalf of dLocal are recruited and employed in line with applicable labour standards and regulations.

For suppliers, outsourcing partners and other third parties, dLocal performs risk-based due diligence as part of dLocal's Group Third-Party Due Diligence Procedure. Prior to engagement, prospective suppliers and other third parties are asked to provide information that allows dLocal to assess legal and ethical conduct, financial-crime, cybersecurity, privacy and operational risks, and, where relevant, indicators of modern-slavery and labour-rights risk.

Risk is not assessed only at onboarding. dLocal periodically reassesses relevant third parties - particularly those operating in higher-risk sectors, jurisdictions or business models - and may carry out event-driven reviews where there are material changes or incidents. Where dLocal identifies heightened risk, dLocal may apply additional measures such as enhanced due diligence, more frequent monitoring, specific corrective-action requirements or, where necessary, remediation and potential exit from the relationship.

dLocal's due-diligence processes are supported by contractual and policy measures. For key suppliers and partners, dLocal seeks appropriate contractual commitments requiring compliance with applicable laws and alignment with dLocal's Modern Slavery Policy, Code of Ethics and related group policies.

Due diligence is complemented by dLocal's whistleblowing and investigations framework. Employees and external stakeholders can raise concerns - including potential modern-slavery or human-rights issues - through dLocal's 24/7 [Whistleblowing Channel](#) (confidential and, where permitted by law, anonymous) and other escalation routes, with explicit protections against retaliation. Reports are assessed promptly and, where appropriate, investigated and escalated to the Ethics Subcommittee and, where required, to regulators or law-enforcement authorities.

F. TRAINING

dLocal recognises that preventing modern slavery and human trafficking starts with people understanding the issues and knowing what to do if they see a problem. We maintain a framework of training and policies that explain the types of risks that can arise in dLocal's operations and value chain, the standards we expect from those who work for or with dLocal, and the routes available to raise concerns, including dLocal's [Whistleblowing Channel](#). These measures are intended to build awareness, support a speak-up culture and enable dLocal to respond and take corrective action where needed in relation to modern slavery and human trafficking.

G. OVERSIGHT AND REVIEW

dLocal's work on modern slavery and human trafficking currently focuses on improving transparency over suppliers and labour-supply chains, strengthening dLocal's ability to identify modern-slavery and human trafficking risks and potential incidents in dLocal's operations and higher-risk suppliers, enhancing dLocal's capacity to prevent modern slavery and human trafficking through more robust due-diligence and contractual controls, integrating modern-slavery and human trafficking considerations into risk assessments for new outsourcing and other higher-risk third-party arrangements, and further developing how concerns are raised, investigated and resolved, including through dLocal's [Whistleblowing Channel](#). These focus areas are reviewed on an annual basis in connection with the preparation and approval of this Statement and are adjusted where appropriate.

In assessing how effective this approach is in practice, we look in particular at:

- the outcome of dLocal's annual review of this Statement and related policies;
- the implementation of dLocal's internal training, conduct and whistleblowing arrangements;
- the extent to which dLocal's risk-based due-diligence and risk-assessment processes are applied to suppliers;
- the ongoing management and monitoring of dLocal's supply chains; and
- oversight by the Board of Directors of dLocal, which is responsible for reviewing and approving this Statement annually and for monitoring the effectiveness of the Group's modern slavery and human trafficking framework, including its application to dLocal UK.

Approved by the Board of Directors of dLocal on 30 June 2026.

Signed by: 
Signed: DADB58D6FB36426

Name: Andres Bzurovski

Title: Director

For and on behalf of the Board of Directors of dLocal