

Publicly held company
CNPJ No. 03.802.115/0001-98
NIRE 35.3.0037927-6



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Clarifications of news published in the media

ClearSale S.A., a corporation, registered with the Brazilian Securities and Exchange Commission ("CVM") as a category "A" publicly-held company, under code 26093 ("Company"), in compliance with Official Letter No. 90/2024/CVM/SEP/GEA-2, dated April 5, 2024, received by the Company at 5:09 p.m. ("Official Letter"), through which the CVM's Corporate Monitoring Management 2 ("GEA-2") requested the Company to provide certain clarifications regarding the news published in the Brazil Journal entitled "ClearSale in final negotiations with Serasa" ("News"), exposes and clarifies what follows.

For a better understanding of this manifestation, and in compliance with the guidelines sent by GEA-2, the content of the Official Letter is transcribed below:

"Official Letter No. 90/2024/CVM/SEP/GEA-2

Rio de Janeiro, April 05, 2024.

To the Sr.,

*Renan Shigueo Ikemoto
Investor Relations Officer at
CLEAR SALE S.A.
Email: ri@clear.sale*

*C/C: Superintendence of Listing and Supervision of Issuers of B3 S.A. – Brazil,
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Subject: Request for clarification

Dear Director,

We refer to the news published on the Brazil Journal website on 04/05/2024, entitled "ClearSale in final negotiations with Serasa", which reads as follows:

Experian, which owns Serasa in Brazil, is in final talks to acquire ClearSale, the Brazilian anti-fraud tools company listed on B3, two people familiar with the matter told Brazil Journal.

After hitting a low of R\$3.15 in January this year, ClearSale's stock has been up 57% since the beginning of March – and is up 10% this afternoon amid speculation about the sale of the company.

As with any transaction of this type, there is no guarantee that the deal will be closed, but negotiations between the two sides began in early 2023 – and have already gone back and forth several times.

The due diligence ended at the end of March, and negotiations are still continuing.

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The sources said the conversation involves a substantial premium on market value and ClearSale founder Pedro Chiamulera potentially taking on a global role at Experian.

ClearSale's deal is seen as highly complementary to that of Experian, a global information management and database giant worth £31 billion on the London Stock Exchange.

In Brazil, Serasa Experian is the dominant player in the credit analysis market, with a market share of more than 60%. ClearSale, on the other hand, serves 10 of the 10 largest ecommerces in the country, and 7 of the 10 largest financial institutions, analyzing customer behavior to try to prevent fraud.

ClearSale looks at everything from the most obvious scams — such as a fake link — to changes in consumer behavior that may indicate that a fraud is taking place — for example, using a different cell phone than the standard or buying from a non-standard location.

"Serasa Experian already knows everything about consumers in terms of assets and liabilities. If it also has the behavior information, it will become a total one-stop shop for any B2C relationship," said a source close to the company.

ClearSale's largest shareholders are founder Pedro Chiamulera with 35.3%; and Verônica Serra's Innova Capital, with 17%. The free float is 30%.

[emphasis added]

2. Regarding the content of the news transcribed above, especially the highlighted excerpts, we request your statement on the veracity of the information provided in the news, and, if so, we request additional clarifications on the subject, as well as inform the reasons why you understood that the matter was not a Material Fact, under the terms of CVM Resolution No. 44/21.

3. The Company must also inform which documents already filed in the Empresas.NET System contain more detailed information on the subject.

4. Such statement must include a copy of this Letter and be sent through the Empresas.NET System, category "Notice to the Market", type "Clarifications on CVM/B3 questions". The fulfillment of this request for manifestation by means of a Notice to the Market does not exempt the eventual determination of liability for the failure to timely disclose a Material Fact, pursuant to CVM Resolution No. 44/21.

5. We emphasize that, pursuant to Article 3 of CVM Resolution No. 44/21, it is incumbent upon the Investor Relations Officer to disclose and communicate to the CVM and, if applicable, to the stock exchange and the entity of the organized over-the-counter market in which the securities issued by the company are admitted to trading, any material act or fact that occurred or related to its business, as well as ensuring their wide and immediate dissemination, simultaneously in all markets in which such securities are admitted to trading.

6. We also recall the obligation set forth in the sole paragraph of article 4 of CVM Resolution No. 44/21, to question the Company's managers and controlling shareholders, as well as all other persons with access to material acts or facts, in order to ascertain whether they are aware of information that must be disclosed to the market.

7. Pursuant to the sole paragraph of article 6 of CVM Resolution No. 44/21, it is the duty of the controlling shareholders or managers of the publicly-held company, directly or through the Investor Relations Officer, to immediately disclose the material act or fact pending disclosure, in the event that the information escapes control or if there is an atypical fluctuation in the quotation, price or traded quantity of securities issued by the publicly-held company or referenced thereto. Therefore, in the event of a leak of material

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information (its disclosure through a press vehicle, for example), the Material Fact must be disclosed, regardless of whether or not the information originates from statements by representatives of the Company.

8. We also highlight that Article 8 of CVM Resolution No. 44/21 provides that the controlling shareholders, officers, members of the board of directors, the fiscal council and any bodies with technical or advisory functions, created by statutory provision, and employees of the company, must maintain the confidentiality of information related to a material act or fact to which they have privileged access due to the position or position they occupy, until its disclosure to the market, as well as ensuring that subordinates and third parties of its trust also do so, jointly and severally liable with them in the event of non-compliance.

9. By order of the Superintendence of Relations with Companies, we warn that it will be incumbent upon this administrative authority, in the exercise of its legal powers and, based on item II, of article 9, of Law No. 6.385/76, and article 7, combined with article 8, of CVM Resolution No. 47/21, to determine the application of a punitive fine, without prejudice to other administrative sanctions, in the amount of R\$ 1,000.00 (one thousand reais), for non-compliance with the requirements formulated, until 9 am on April 8, 2024."

The Company informs, on the matter in question, that at 5:15 p.m. on April 5, 2024, it disclosed a material fact clarifying that it constantly seeks and analyzes opportunities aimed at the development of its activities and the generation of value for the Company and its shareholders. To this end, the Company maintains frequent contacts with potential business partners, including Serasa.

The Company evaluates potential operations to expand its business and investments, including through eventual acquisitions of stakes, partnerships and/or corporate reorganizations with various market participants. However, contrary to what the News indicates, the Company is not in final negotiations or has entered into any document or appears as part of any binding transaction.

Management continues to focus on the implementation of its business plan and the achievement of its results, and emphasizes again that, contrary to what is contemplated in the News, there is no definition of the effective execution of potential operations, their terms and conditions or even any definitive or binding document in this regard.

As these considerations are deemed pertinent in relation to the Letter, the Company is at your disposal for additional clarifications that may be necessary.

São Paulo, April 8, 2024

Renan Shigueo Ikemoto
Investor Relations Officer
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