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Introduction

The ESG Global Policy ("Policy") aims to consolidate the principles, strategic guidelines, and governance framework established to guide the activities of Nu Holdings Ltd. ("Nu" or "Company").

This Policy is guided by Nubank's mission to fight complexity and empower people in their daily lives by offering products and services that aim to generate positive, meaningful, and lasting impact. Based on the principles of ethics, transparency, equity, and both individual and corporate responsibility, the Company's operations are conducted in compliance with the applicable regulations and its Code of Conduct, in order to mitigate the risks of economic, social, environmental, and climate impacts associated with its activities.

Target Audience

This Policy is applicable to:

1. Nu Holdings Ltd. and the controlled subsidiaries of the Company, wherever located, except to the extent it conflicts with applicable local requirements.
2. To all those who are directly or indirectly impacted by the activities of the Company and its subsidiaries, especially customers, employees or collaborators ("Nubankers"¹), and suppliers.

Principles and Guidelines

The implementation of the ESG Global Policy considers the principles of relevance and proportionality. These include the degree of exposure and materiality to social, environmental, and climate risk, as well as the alignment of the Policy with the nature and complexity of Nu's products, services, activities, and processes, and its relationship with

stakeholders.

Based on our materiality matrix, which reflects the relevance of environmental, social, and governance topics to our stakeholders, we outline below the main guidelines for the topics covered by this Policy:

Financial Education and Inclusion

- Facilitate access to the financial system and providing financial education tools that promote the responsible and informed use of products and services — with the goal of making our customers' lives easier through a human-centered and personalized experience.
- Maintain a constructive relationship with Nubankers, including compliance with applicable labor laws, to support the development of an inclusive and accessible portfolio of solutions.

Security, Privacy, and Data Protection

- Ensure proper management of cybersecurity and the governance of privacy and personal data protection under Nu's responsibility. Access to and use of any type of data — especially personal data of Nubankers, customers, and third parties — must follow our Global Privacy and Data Protection Governance Policy, our Cybersecurity Policy, and applicable laws and regulations.
- Promote transparency and accountability in the use of personal data by Nu by clearly and accessibly communicating, through Nubank's Privacy Notice, the channels available for exercising data subject rights and the types of data processing activities carried out.

Social, Environmental, and Climate Risk Management

- Consider social, environmental, and climate-related criteria when assessing risk exposures arising from Nu's operations, products, and services, ensuring their integrated management alongside other risks to which the organization is exposed.

Ethics and Integrity

- Ensure an ethical environment by establishing guidelines for combating corruption, money laundering, the financing of terrorism, proliferation of weapons of mass destruction and sanctions risk by providing clear and objective information to stakeholders to guarantee that our disclosures are accurate and transparent.
- Encourage and train Nubankers to uphold the guidelines and values outlined in our Global Code of Conduct and Anti-Corruption Policy. Additionally, strengthen the use of our whistleblowing channel — "Parker" — which is available by phone or online, and can be used anonymously or not, by anyone wishing to report a violation of Nu's Code of Conduct.

People and Culture

- Ensure high performance and operational efficiency through continuous investment in innovation, technology, professional development, and the well-being of Nubankers in the workplace.
- Maintain a healthy and engaging work environment, reflected in the satisfaction and motivation of our teams.

- Building strong and diverse teams is one of Nu's core values. This includes a specific strategy covering non-discrimination based on age, ancestry, family or medical condition, gender identity or expression, genetic information, marital status, nationality, physical or mental disability, political affiliation, race or ethnicity, religion, sexual orientation, or any other characteristic. We are committed to ensuring equal and fair treatment of Nubankers and Nu's stakeholders.

Human Rights

Respect, protect, and promote Human Rights in accordance with the principles established in the United Nations Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Climate Change

Manage Greenhouse Gas (GHG) emissions and continuously improve efforts to mitigate, and offset the direct environmental impacts of Nu's operations.

Monitor climate-related risks associated with our products and services, ensuring appropriate mitigation mechanisms while also maximizing opportunities related to this agenda.

Responsible Supply Chain

Maintain a relationship of integrity and transparency with Nu's supply chain, governed by our Supplier Code of Conduct, which sets out the expectations and standards our suppliers must adhere to regarding human and labor rights, business integrity, and social and environmental responsibility.

The principles and guidelines outlined above are applied throughout our operations, following the principles of relevance and proportionality in relation to the business strategy and the potential impact on our products and services.

Roles and Responsibilities

Nu has a governance structure that is compatible with its size, the nature of its business, the complexity of the products and services offered, as well as the activities, processes, and systems in place to ensure compliance with the guidelines and objectives set forth in this Policy. The corporate governance structure adopted by Nu emphasizes transparency, fairness, accountability and corporate responsibility as its guiding principles, which, when converted into corporate governance practices, enable the improvement of management, the harmonization of interests, the sustainable growth of the business and the generation of value for the perpetuity of the Nu Group. The corporate governance structure is outlined in the Company's current Global Corporate Governance Policy.

Review and Approval

The ESG Global Policy shall be reviewed every two years or in the event of significant changes in applicable legislation, the structure of the Company, materiality, or internal processes that may impact the established governance functions.

[This version of the ESG was approved by the Board of Directors of Nu Holdings Ltd.]

Support Channel

In the case of questions about any provision of this Policy, please contact the ESG Team.

Review Control

Review	Date	Description
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