

GLOBAL ESG POLICY  
NU HOLDINGS LTD.  
CORPORATE POLICY LEVEL 1

## 1. Introduction

As a company committed to playing a key role in achieving a more fair and sustainable future, we from Nu Holdings Ltd. (“**Nu**”) put into practice the four pillars of our strategy, known as Nu Impact: ESG integration; Shared Value Creation; Governance; and Social Impact.

**Nu Impact** has as its main goal the connection of profit and purpose to ensure that Nu will be remembered not only for the revolution it created, but also for how we got there.

We support inclusive economic opportunities, protect fundamental rights, and empower our stakeholders - customers, employees, investors, and society as a whole. Through this, we want to be recognized as an innovative, responsible and inclusive company.

At **Nu**, we put into practice our mission and pillars and make them central to our day-to-day activities. We do so by applying in our operations the principles, guidelines and governance procedures foreseen in this Global ESG Policy (the “**Policy**”) and in other institutional documents and policies established by **Nu**.

## 2. Principles

Our activities, strategies and decisions are based on the following principles:

Relevance: consideration of the social and environmental risks and materiality of those risks posed by the services offered by **Nu**.

Proportionality: compatibility between this Policy, the nature of **Nu**’s activities and our operations, services, and financial products.

Ethics and transparency: provision of clear and objective information to our stakeholders, in order to demonstrate that our financial statements are complete and transparent.

Diversity and inclusion: building strong and diverse teams is one of **Nu**’s core values, which involves nondiscrimination based on age, origin, color, family or medical condition, gender identity or gender expression, genetic information, marital status, nationality, physical or mental condition, political affiliation, race, religion, sexual orientation or any other characteristic that may cultivate a more diverse and inclusive environment, and the guarantee of equal and fair treatment to **Nu**’s stakeholders.

Respect and Human Rights protection: to fight against child labor, labor analogous to slavery, forced prostitution and child sexual exploitation. The commitment to responsible corporate citizenship, and the handling of commercial operations by respecting, protecting, and promoting universal human rights.

Efficiency and performance improvement: constant investments in innovation, technology and capacity building, ensuring quality and well-being in the workplace of our organization.

Integration of social and environmental values: consideration of environmental, social and governance factors in our businesses, products, services and relationships, aiming to provide long term value to our stakeholders.

### 3. Guidelines

Nu intends to incorporate, disseminate and apply social and environmental principles to create a culture of organizational responsibility, mitigating risks related to social and environmental factors and promoting a more sustainable business environment.

As such, environmental, social and governance factors (“ESG”) have been integrated to our culture, processes, and products, beyond the basic compliance requisites, through the following guidelines:

- a) **Development of business and products that are socially and environmentally responsible, with a focus on financial inclusion:** when developing our business strategies, we take into consideration the opportunity to empower people in their financial lives, as well as contribute to financial inclusion through our services and reach, while also improving social equality, people's quality of life, and reducing greenhouse gas emissions in our activities.
- b) **Ethical, transparent and efficient governance model:** as a result of a high degree of ESG integration in our decision-making processes, we strive to promote human rights, ethics, and transparency in our relations with our stakeholders. For our team, we protect well-being, diversity, and non-discrimination in our workplace. In addition, our corporate governance practices are based on the principles of transparency, equity, accountability, and corporate responsibility.
- c) **Data protection and cyber security:** our stakeholders’ data protection and cyber security is a focal point of our business and given special attention, as set forth in our Privacy Policy.
- d) **Shared value creation:** we want to create as much value as possible for our stakeholders. As such, we structure our stakeholder strategy and engagement plan by converging their needs and our business priorities in order to foster shared value creation.
- e) **Social and environmental risk management:** we have established a social and environmental risk management structure compatible with our business

model, the nature of our operations, and the complexity of our products, services, activities, and processes to include ESG considerations in our overall risk management strategy, including when launching new products, in accordance with local legal requirements.

- f) **Stakeholder Relationship Management:** we have a strong commitment to having a significant, lasting and positive impact on people's lives. We believe this is fundamental for business orientation, and we continue to invest in the development of initiatives focused on creating value for society.
- g) **Consideration of global initiatives, guidelines and principles:** we also consider global initiatives, guidelines and principles set by international private and public institutions, focused on the material themes for our operations and activities, when driving our business forward.

#### 4. Governance

Governance at Nu is inspired by the most prominent guidelines and principles worldwide, recommended by institutions dedicated to equal, fair, responsible, and sustainable corporate management.

As for the implementation of ESG factors in our daily activities, the following bodies and initiatives stand out:

- a) **Board of Directors:** provides oversight in the formulation of the long-term strategic, financial and organizational goals of Nu and of the plans designed to achieve those goals. It reviews and approves Nu's standards and policies to aid management in carrying out their day-to-day operational duties in a competent and ethical manner and consistent with high standards of responsible conduct and ethics.
- b) **Stakeholders' Committee:** assists Nu's Board of Directors in considering and monitoring the interests of our key stakeholders, by providing insights and recommendations intended to create long-term value for our stakeholders.
- c) **Leadership Development, Diversity and Compensation Committee:** approves or makes recommendations to our Board of Directors regarding the compensation of our executive officers and key service providers, also reviewing and assessing our workforce inclusion and diversity and the administration of compensation programs in a non-discriminatory manner.
- d) **Audit and Risk Committee:** has as its main responsibilities: (i) overseeing the Company's corporate accounting and financial reporting practices and the audit of the Company's financial statements; (ii) the independent auditors' qualifications and independence; (iii) overseeing the performance of the Company's internal audit function and independent auditors; (iv) maintaining the quality and integrity of the Company's financial statements and reports; (v) reviewing and approving all audit engagement fees and terms, as well as all non-audit engagements with the independent auditors; (vi) overseeing the Company's overall risk framework and risk appetite framework and (vii) overseeing the Company's compliance with legal and regulatory requirements, including reviewing relevant communications with regulators.

In addition, the Compliance team maintains Nu's Ethics Program, which sets the organization's minimum conduct standards, including the Code of Conduct, Compliance Policies, Training and Awareness Campaigns, and Global Whistleblower Policy. In addition, the Regulatory team is focused on overseeing Nu's adherence to all applicable regulations. Further, the Corporate Governance team is responsible for Nu's compliance with governance best practices generally recognized in international markets, and maintains Nu's Corporate Governance Policy.

## 5. Final Remarks

Nu believes its mission is to create a better world for its internal community, collaborators, shareholders, customers and society, through financial inclusion, and through reliable disclosure and reporting, aiming to create value for our stakeholders.

This Policy will function in accordance with the actions hereby indicated and in compliance with Nu's other policies.

## 7. Review and Approval

This Global ESG Policy was created and adopted by the Board of Directors of Nu Holdings Ltd. and applies to any controlled affiliate of the Company, wherever located, except to the extent it conflicts with applicable local requirements. This Policy may be revised by the Board of Directors of Nu whenever needed or in the face of significant changes in legislation or Nu's internal procedures.

## 8. Control Version

Version	Description of change	Date of change	Squad responsible	Date of approval	Approver
1.0	Initial Version	-	ESG	Dec 30, 21	Board of Directors