



**NU PAGAMENTOS S.A. – PAYMENT INSTITUTION**

**CORPORATE POLICY LEVEL 2**

**ENVIRONMENTAL AND CLIMATE SOCIAL RESPONSIBILITY POLICY**

**Effective as of:** August 2025

**Last revision:** August 2025

## **Contents**

Introduction

Scope and Disclosure

Principles and Guidelines

Implementation Plan

Duties and Responsibilities

Applicable Legislation and Regulations

Review and Approval

Communication Channel

Revision Control

## **Introduction**

The Environmental and Climate Social Responsibility Policy ("PRSAC" or "Policy") aims to consolidate the principles, strategic guidelines, and governance framework established to guide the activities of Nu Pagamentos S.A. – Payment Institution ("Nu Pagamentos" or "Company") and of the Prudential Conglomerate led by the Company ("Conglomerate" or "Nu Brasil") regarding social, environmental, and climate-related matters to be observed in the conduct of its business, in compliance with the regulatory requirements of Resolution No. 331, issued by the Central Bank of Brazil ("BACEN") on June 27, 2023.

The PRSAC is guided by Nubank's mission to fight against complexity and empower people on a daily basis by offering products and services that seek to generate positive, meaningful, and long-lasting impacts. Based on the principles of ethics, transparency, fairness, and individual and corporate responsibility, Nu Brasil's operations are conducted in compliance with the regulations applicable to the Conglomerate and its Code of Conduct, in order to mitigate the risks of economic, social, environmental, and climate-related impacts associated with its activities.

## **Scope and Disclosure**

This Policy applies:

- to Nu Pagamentos S.A. – Payment Institution – and other companies authorized to operate by BACEN that are simultaneously part of the Conglomerate;
- to all those who are directly or indirectly impacted by the activities of the Company and its Conglomerate, in particular clients, employees ("Nubankers"<sup>1</sup>), third-party contractors, and suppliers.

1. This Policy applies to all Nubankers (employees, officers, independent consultants, apprentices, interns, directors of Nu Pagamentos S.A. – Payment Institution – and its subsidiaries), regardless of position, role, or length of service with the company.

- à Nu Pagamentos S.A. – Instituição de Pagamento – e demais empresas autorizadas a funcionar pelo BACEN que concomitantemente integrem o Conglomerado.

This Policy, as well as the actions implemented to ensure its effectiveness and disclosed in the Company's ESG Report, must be made available and published on Nu Brasil's website.

## **Principles and Guidelines**

The implementation of the PRSAC, in addition to compliance with BCB Resolution 331 and other applicable regulations, 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 PRSAC with the nature and complexity of Nu Brasil's products, services, activities, and processes, and its relationship with stakeholders. The Policy must permeate the entire organizational structure of the institution, ensuring compatibility and integration of the PRSAC with the Company's other policies, in line with the scope defined in the previous section.

Based on our materiality matrix—which highlights the relevance of Environmental, Social, and Governance ("ESG") topics for our stakeholders—and our values, we outline below the main guidelines for the matters covered by the PRSAC:

### **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 Brasil'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.
- Ensure transparency and accountability regarding the use of personal data by Nu Brasil, by providing information on service channels for data subject rights and on personal data processing activities in clear and accessible language through Nubank's Privacy Notice.

### **Social, Environmental, and Climate Risk Management**

Consider social, environmental, and climate-related criteria when assessing risk exposures arising from Nu Brasil'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, board members, officers, independent consultants, apprentices, and interns 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 Brasil'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 Brasil'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, and the 1988 Federal Constitution of Brazil.

### **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 Brasil'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.

## **Implementation Plan**

The application of the guidelines and actions established by this PRSAC shall follow the Implementation Plan defined by the ESG Department, in coordination with the areas responsible for managing the matters addressed in this Policy. This process is subject to ongoing review, enhancement, and monitoring, with the contribution of our stakeholders.

## **Duties and Responsibilities**

Nu Brasil has a governance structure that is consistent with its size, the nature of its business, the complexity of the services and products offered, as well as the activities, processes, and systems in place, in order to ensure compliance with the guidelines and objectives of the PRSAC. The guiding principles of our governance are transparency, fairness, and individual and corporate responsibility, which enable improved management, alignment of interests, business sustainability, and value creation for the Company and for Nu Brasil.

The composition of corporate governance is described in the Company's current Corporate Governance Policy, and below are the governance bodies directly responsible for managing social, environmental, and climate-related risks in this context:

- **Executive Board:** approve and review this Policy, with the support of the officer responsible for the PRSAC and the Social, Environmental, and Climate Responsibility Committee; strategically define actions within the scope of the PRSAC and ensure their alignment with Nu Brasil's strategy, conducting its activities in compliance with this Policy and its implementation actions; ensure the compatibility and integration of the PRSAC with other corporate policies, as defined by the Corporate Governance Policy, including, where applicable, credit, human resources management, risk management, capital management, and compliance policies; assess the effectiveness of the actions implemented and ensure timely remediation when deficiencies are identified; ensure that the institution's remuneration structure does not encourage behaviors incompatible with the PRSAC; approve and annually review policies, strategies, risk management limits, and stress testing programs with SAC scenarios; provide guidelines for the stress testing program and approve scenarios when applicable; approve the implementation guidelines of the Social, Environmental, and Climate Responsibility Committee; promote the internal dissemination of the PRSAC and its actions to ensure effectiveness; and be responsible for properly maintaining the corresponding records.
- **Social, Environmental, and Climate Responsibility Committee:** review the PRSAC, submitting recommendations to the Executive Board and maintaining the appropriate records; assess its level of adherence, proposing recommendations to the Executive Board for improvements to ensure effectiveness when necessary, and maintaining the appropriate records; evaluate and submit recommendations to the Executive Board on the compatibility and integration of the PRSAC with other policies established by the Conglomerate, including, where applicable, credit, human resources management, risk management, capital management, and compliance policies; support the Executive Board in monitoring timely remediation of

deficiencies related to the PRSAC, as applicable; support the Executive Board in defining the organization and responsibilities of the Committee, as described in its Charter; support the Executive Board in ensuring that the Conglomerate's remuneration structure does not encourage behaviors incompatible with the PRSAC; support the Executive Board in promoting the internal dissemination of the PRSAC and its actions to ensure effectiveness; and oversee the activities of the officer responsible for the PRSAC, in order to advise them in evaluating the mechanisms proposed and adopted.

- **Officer Responsible for the PRSAC:** lead the decision-making process related to the establishment and review of the PRSAC, supporting the Executive Board; promote the implementation of actions to ensure its effectiveness; oversee the monitoring and evaluation of the actions implemented, as well as improvement plans when deficiencies are identified; ensure the proper external disclosure, in a single and easily identifiable location on Nu Brasil's website, of the information required by applicable regulation; and maintain records of these obligations.
- **ESG Department:** propose adjustments and improvements to the content of the PRSAC to the Executive Board and the Officer responsible for the PRSAC; manage the PRSAC Implementation Plan; develop, manage, and internally communicate Nu Brasil's ESG strategy in alignment with the premises of this Policy; and maintain records of documents related to the PRSAC and its implementation for a minimum period of five years.
- **Risk Committee:** advise the Executive Board in carrying out its responsibilities related to the management and control of corporate risks, including social, environmental, and climate risks, as well as provide support regarding the internal control system, capital management, and compliance, including anti-money laundering, monitoring the Company's risk exposure level in accordance with its Risk Appetite Statement ("RAS").
- **Sustainability Risks (SAC):** develop and enhance methodologies, tools, and procedures for the management of social, environmental, and climate risks (SAC), ensuring compliance with applicable regulations and the company's internal policies, including the PRSAC.
- **Business Areas:** develop products and services that also seek to generate positive impacts for society, with a particular focus on financial inclusion.
- **Support and Control Areas:**
  - **Internal Audit:** periodically and independently evaluate the processes related to the establishment of the PRSAC and the implementation of actions to ensure its effectiveness, with the aim of correcting any non-conformities identified, as well as recommending other improvements to be adopted.
  - **Compliance:** monitor new regulations issued by regulatory and self-regulatory bodies and provide visibility to the impacted areas; support

and advise Nu Brasil's departments in identifying, assessing, mitigating, and managing compliance risk, ensuring Nu Brasil's adherence to such regulatory changes; internally coordinate the actions required to meet regulatory obligations, gathering information from the various departments and ensuring that responses are provided to the regulator in a timely manner.

- **Procurement:** implement the PRSAC guidelines in supply chain management.
- **People and Culture:** manage employee relations in alignment with the principles of the PRSAC, including Diversity & Inclusion, as well as Talent Attraction and Retention.
- **Other Nu Brasil Departments:** be familiar with the PRSAC and implement its guidelines within their activities, seeking support from the ESG Department whenever necessary.

## Applicable Legislation and Regulations

This Policy and the activities herein provided shall comply with the requirements of BACEN Resolution No. 331, dated June 27, 2023.

## Review and Approval

The PRSAC shall be reviewed every two years, or in the event of significant changes in the structure of the Company and/or Nu Brasil, including updates in applicable legislation, materiality, or internal processes that may impact the established governance functions.

## Communication Channel

Questions and/or suggestions regarding the PRSAC and its implementation should be directed to: [esg@nubank.com.br](mailto:esg@nubank.com.br).

## Revision Control

Review	Date	Description
01	28/11/2022	Versão Inicial
02	XX/08/2025	Revisão regulatória e atualização

Created by: ESG	Reviewed by: ESG and Teams	Approved by: Nu Pagamentos
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Date: [●]	Date: [●]	Date: [●]

<u>Level of Confidentiality:</u> Public
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