

Supplier Code of Conduct

December ————— 2021

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Welcome to Nu Holdings Ltd. Supplier Code of Conduct.

We believe that Nubankers create the Nu Holdings Ltd. they want and that along with that, Nu Holdings Ltd. with the support of our suppliers and business partners, will be the revolution in the markets where we operate.

This Code clearly and simply sets out the minimum requirements we expect from you. We are committed to the highest ethical standards, diversity, care for the environment, and transparent relationships. There is no way to act otherwise if we want to remain in the market for many, many years.

We are known for questioning a traditional market and challenging the status quo. When it comes to ethics, we also expect you to be an example of the positive things we want for the world.

Best wishes,
David, Cris, and Ed.



01 ————— Introduction

FOR NU HOLDINGS LTD., INTEGRITY AND TRANSPARENCY ARE NON-NEGOTIABLE VALUES.

Operating in the industry and geographies where we have business requires absolute commitment to the highest ethical standards. We believe that we can only attract the best and most talented and diverse professionals, customers, and business partners by doing so.

We see our suppliers as long-term business partners with whom we share the responsibility of questioning a traditional industry and challenge the status quo at every move. That is why we carefully plan the selection of all our partners.

So, we developed the present Supplier Code of Conduct (“Code”), which sets the minimum standards of business conduct we expect from all our service providers and business partners (“Supplier”). By accepting this Code, the Supplier acknowledges that all current and future contracts, agreements, and business relationships with Nu Holdings Ltd. will be subject to the provisions of this document.

1.1. GUIDELINES

Based on Nu Holdings Ltd. Code of Conduct, available on Nu Holdings Ltd. website, we have set ethical, social, and environmental guidelines for all Nu Holdings Ltd. Suppliers. When developing and selecting Suppliers, Nu Holdings Ltd. impartially considers technical, professional, and ethical criteria and compliance with legal, labor, and environmental requirements. Likewise, we expect our Suppliers to choose to hire only companies that comply with the principles described in this Code.

Socially responsible suppliers that are also committed to the social and community transformation causes defended by Nu Holdings Ltd. will take precedence in our selection processes.

We expect, therefore, that our Supplier's commitment and practices are consistent with the following topics.



02 — Human Rights and Labor Practices

2.1. CHILD LABOR AND MODERN SLAVERY

Nu Holdings Ltd. has zero tolerance for child labor. Suppliers must, without exception, comply with local laws, regulations, and standards regarding the minimum employment age.

Likewise, forced labor, modern slavery, and involuntary labor are strictly forbidden. Suppliers must not use any form of coercion to make their employees work more hours than permitted by local legislation or their corresponding labor agreements. Acts of violence, confinement, or any other form of harassment as a disciplinary measure will not be tolerated either.

Employees must be free to leave the workplace at the end of their working day and leave their job, if they wish, provided they give the appropriate prior notice or compensation, according to local laws.

2.2. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Suppliers must make sure their employees have the right to freedom of association, joining or forming a trade union, and collective bargaining, in compliance with the applicable local legislation.

2.3. HARASSMENT AND DISCRIMINATION

Suppliers must carry out their activities with dignity, respect, and integrity towards their employees, their Suppliers, or Nubankers. Therefore, Suppliers are strictly forbidden to adopt discriminatory recruitment and promotion practices, either based on race, color, religion, gender, age, physical ability, descent, nationality, sexual orientation, political affiliation, union membership, or marital status. Neither will Nu Holdings Ltd. tolerate any form of abuse, intimidation, threat, or harassment, either physical, sexual, or verbal.

Therefore, Suppliers must, at least, encourage inclusive and respectful practices, promote Diversity and Inclusion and follow all human rights guidelines.

03 — Business Integrity

3.1. CORRUPTION ACTS

Nu Holdings Ltd. does not accept that our employees and representatives engage in any activities related to public and private corruption. The same behavior is expected and required from all our Suppliers without exception.

Suppliers are forbidden to directly or indirectly promise, offer, give or receive any payment or inappropriate advantage to public officials or a third person related to them to influence any act or decision to benefit themselves, Nu Holdings Ltd., or third parties.

Therefore, Suppliers are forbidden to practice any harmful act against national or foreign public administration described in the Anti-Corruption Act or any other legislation applicable to Nu Holdings Ltd. or the Supplier. That prohibition extends to activities that are not related to Nu Holdings Ltd. performed by Suppliers, such as obtaining operating licenses and permits, avoiding inspections and fines, etc.

Also, Suppliers should observe that competition and antitrust legislation prohibit business practices that conflict with the principles of free and fair competition and help to uphold fair and ethical business practices.

3.2. FINANCIAL CRIMES

Suppliers must comply with all applicable laws and regulations regarding AML/CFT and Sanctions, and only engage with companies free from misconducts related to Financial Crimes. Also, Suppliers must have appropriate routines and controls in place to ensure that legal and regulatory requirements are being complied with.

3.3. CONFLICT OF INTEREST

For the purpose of this Code, we consider a conflict of interest a situation where the interests of the Supplier, its employees or representatives, are incompatible with the interests of Nu Holdings Ltd.

Examples of potential conflicts are kinship up to the second degree or an intimate relationship between Nubankers and employees of the supplier who work on projects involving Nu Holdings Ltd.; and the hiring of a Nubanker by a supplier for professional activities. These and other possible conflicts of interest situations must be observed by the Supplier and reported to Nu Holdings Ltd. promptly through the email ethics@nubank.com.br.

It is the Supplier's responsibility to inform Nu Holdings Ltd. whether they have any director or officer (related party) in common with Nu Holdings Ltd.

3.4. GIFTS AND ENTERTAINMENT

OSuppliers must not send gifts or forms of entertainment to Nubankers with the intention of influencing any type of a business decision, including the Procurement process.

If the action is for legitimate business purposes, sending gifts and entertainment will be permitted with a limit of up to US\$50 or the equivalent in local currency.

It is strictly forbidden to give or offer commission or any money gratification to any Nu Holdings Ltd. representative in any circumstances.

Except with previous and express authorization issued by a Nu Holdings Ltd. legal representative, Suppliers are forbidden to send gifts or any form of entertainment to any third party on behalf of Nu Holdings Ltd.

3.5. INTELLECTUAL PROPERTY

Except with previous and express authorization issued by a Nu Holdings Ltd. legal representative, Suppliers are forbidden to use Nu Holdings Ltd. brand, including to promote the partnership.

Suppliers must not file or register, in their name or on behalf of any of their representatives, any intellectual property rights, including Nu Holdings Ltd. brands, brands that are similar to Nu Holdings Ltd. brands, or that may mislead or cause confusion to the public. Likewise, Suppliers must not use, file, or register Nu Holdings Ltd. brands, trade name, domain names, or any other Nu Holdings Ltd. intellectual property rights as part of their own brands, domain names, or other IP rights.

Suppliers must not use Nu Holdings Ltd. brand as part of their name or corporate name.

3.6. CONFIDENTIAL INFORMATION

Confidential information are the ones shared in the context of the contract that is not publicly known, which corresponds to any verbal or written data or information, including discoveries, ideas, databases, reports, business, financial, operational, economic, technical, legal secrets, or information, and any business communication between the parties.

Suppliers must treat as confidential all information exchanged between the contract parties, including information related to the existence of the contract, and must not disclose this information to third parties without previously and expressly authorized by a Nu Holdings Ltd. legal representative.





3.7. INSIDER TRADING

As a Supplier it is possible that you can obtain material nonpublic information related to Nu Holdings Ltd. or other companies. If you are in possession of such information you must refrain from:

- _ Trading securities issued by such companies.
- _ Disclosing such information to other parties.

3.8. PRIVACY AND DATA PROTECTION

Suppliers must guarantee that the processing of personal data is carried out in compliance with the applicable legislation. This includes implementing suitable and effective safeguards to mitigate the risk around data processing and the rights and freedoms of individuals.

Also, the Supplier must respect the data subject's privacy rights whenever it processes personal data.

3.9. INFORMATION SECURITY

The Supplier's information security measures must comply with applicable legislation and be aligned to sectorial best practice standards. Additionally, the security controls in place shall be appropriate to the sensitivity of the data being processed and the business context that the supplier is inserted.

Suppliers must guarantee that appropriate measures will be taken to fix security vulnerabilities that may pose a risk to Nu Holdings Ltd., either they are found by Nu Holdings Ltd. specialists or by the Suppliers themselves. Also, Suppliers undertake to inform Nu Holdings Ltd. when suspecting or acknowledging the occurrence of an information security incident or any event that violates the applicable legislation.

3.10. FINANCIAL RECORDS

All Suppliers must have controls, procedures in place over financial records, and comply with laws and regulations. Its financial records must be stored transparently and within the appropriate period following rules and regulations, if applicable. All company expenses must be in accordance with its financial records. Nu Holdings Ltd. does not tolerate any situation of fraud and/or breach of confidence.

04 — Environmental Sustainability

The continuous search for environmentally efficient processes and cleaner production brings real gain opportunities to organizations and society. Efficiency in the use of natural resources and reduction of the environmental impacts caused by human activities is our commitment at Nu Holdings Ltd., and we expect our Suppliers to have the same commitment.

Suppliers must comply with and maintain their processes according to the applicable environmental legislation, adopt corporate environmental management standards whenever necessary, and have adjustment plans in place to address nonconformities. We encourage Suppliers to comply with local or international standards which are more stringent than applicable laws and regulations.

Examples of such actions include: reducing the polluting or damaging activity to the environment, reducing water consumption, reducing air emissions, and others actions related to the supplier's activities.

05 _____
**Parker - Nu
Holdings Ltd.
Whistleblowing
Channel**





Nu Holdings Ltd. has a whistleblowing channel available to anyone who wants to report any violation that involves Nu Holdings Ltd., including this Supplier Code of Conduct.

All reports sent via Parker, Nu Holdings Ltd. Whistleblowing Channel, are confidential and can be made anonymously. All reports will be investigated by a specially assigned team.

Parker can be accessed via website www.nubankparker.com.br available in all geographies.

06 ————— Compliance with this Code

Nu Holdings Ltd. expects its Suppliers to commit to ethical and responsible management based on the requirements of this Code and the respective service provision contracts.

Noncompliance with this Code may result in the termination of the business relationship between the parties, without prejudice to any other legal remedy before the competent jurisdiction.

Nu Holdings Ltd. may change this Code at any time to reflect changes in legislation and/or best practices and/or to pursue our business interests. When that happens, an updated version will reflect such changes and will be made available to all Suppliers.

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