

Social, Environmental, and Climate Responsibility Policy - Revolut Brazil

1. Introduction

This policy formalizes Revolut's approach to Social, Environmental, and Climate Responsibility (SECR) in Brazil, ensuring consistent application across entities in Brazil. It is required to holistically align with not only the economic but also the environmental and societal needs of the future, thereby shaping the future of our operations and interactions with technology, stakeholders, and the communities we serve.

1.1 Objectives

The objective of this policy is to detail how Revolut Holdings Brasil LTDA, Revolut Sociedade de Credito Direto S.A., Revolut Tecnologia Brasil LTDA, Revolut Brasil Prestadora de serviços de ativos virtuais Ltda., and any other Brazilian entities that may be incorporated in the future. All entities jointly referred to as "Revolut Brazil" from now on, commits to sustainable development by integrating SECR principles into our culture and operations. It aims to guide our performance under local laws and regulations, and global best practices, ensuring our contributions towards a sustainable future are concrete, measurable, and in line with our global commitments.

2. Document content

The following regulations define environmental and social risk ("ESR"): Brazilian Central Bank Resolution n. 4945/21, and Brazilian Central Bank Resolution n.4.557/17. For the purpose of the Policy, these definitions apply. Below we tackle details on how Revolut is adding to this definitions and how this risks are handled by the company. The Brazilian Central Bank Resolution n. 4557/17, art. 38-D, E and F states that the risk management framework must have environmental, social and climate risk efforts in place (and details it).

The Brazilian Central Bank Resolution n. 4945/21 demands that financial institutions put in place:

(a) an environmental and social policy ("Policy") considering:

I - relevance: the level of exposure to environmental and social risk in their activities and transactions; and

II - proportionality: the proportionality and compatibility of the Policy with the nature of their business, the complexity of their activities, services and financial products.

The Policy must contain principles and directives which guide:

(a) the business's decisions on environmental and social matters, and the relationship with interested parties (clients, employees, service providers, suppliers);

(b) the strategy, governance and risk management regarding environmental and social matters; and

(c) an appropriate governance structure ("Governance") to ensure compliance with the Policy, which must:

I - be compatible with Revolut Brazil's size, the nature of its business, complexity of its products and services, activities, processes and systems;

II - implement the actions required under the Policy;

III - monitor compliance with the actions under the Policy;

IV - evaluate the effectivity of the actions under the Policy;

V - verify if there is adequate management of Revolut's environmental and social risk; and

VI - identify deficiencies.

2.1 Environmental

What is Environmental and Social Risk in Brazil

Environmental Risk is the possibility of events associated with the environment's degradation, including climatic risk, the excessive use of natural resources, or the occurrence or indication of irregular, illegal or criminal conducts against the environment.

Besides that, it is also considered Environmental Risk any act or activity that, despite being regular, legal and non-criminal, negatively impacts Revolut Brazil's reputation, because it's harmful to common interest.

Furthermore, Revolut Brazil is committed to implementing all the changes in legislation or in governmental supervision, associated with common interests, or fundamental rights, which may negatively impact Revolut Brazil as soon as practicable possible.

Below are some of the commitments that Revolut Brazil takes on together with Revolut global.

Our Commitment Towards Positive Environmental Impact.

Tackling Climate Change. Here at Revolut we believe that climate change is a reality we all have to face, and we all have a responsibility to the wellbeing of our

communities and the recovery of our planet.

As we're building the first truly global financial super app, we want to make sure that we do so sustainably, and that our customers keep control of their impact on the environment, by reducing our own impact as much as possible.

Measuring our CO2 footprint. We offer all our services digitally and we don't have physical branches, which allows us to keep the emissions from our facilities' usage limited.

Nonetheless, our regular business activities still contribute to climate change, which is why we've partnered with Watershed to help us measure our carbon footprint in real-time, establish clear strategies to reduce our impact in every aspect of our business, and report on those emissions.

We measure our carbon footprint in line with industry standards, following the Greenhouse Gas Protocol, and including all Scope 1, 2 and 3 emissions in our calculations. (It's possible to see details on our carbon footprint by accessing our sustainability webpage <https://www.revolut.com/pt-BR/sustainability/>)

Reducing our impact.

Our packaging has been re-designed to use less material, be free of plastic and fully recyclable.

We sort and recycle waste in our office.

As a tech company, what we do with our IT equipment is very important for us: this is why whenever possible, we donate or refurbish any redundant electronic equipment when it reaches its end-of-life. If it cannot be refurbished or reused, we will make sure that none of our electronic equipment ends up in a landfill and is properly disposed of.

Partnerships and Donations. We make it easy for our customers to be part of the change. We constantly support and run donation campaigns to NGOs and groups that engage in support to stop climate change, help war refugees and advocate equal rights for everyone.

We've been cooperating with global and local sustainability charity partners such as WWF, Rainforest Alliance or Open Cages, helping them to raise funds through Revolut Donations platform.

Our aim is to keep developing strategies to mitigate the environmental impact of Revolut Brazil's activities and the activities of our customers.

2.2 Social

Revolut understands the urgency that exists for proactive action in solving social demands. Therefore, it is putting its best efforts into diversity and inclusion and into a good and safe work environment. (There are more details on our webpage for diversity and inclusion <https://www.revolut.com/pt-BR/diversity-inclusion/>)

Here at Revolut we are very interested in external opinions about our business. That is why we ask our customers about their satisfaction with our products. Likewise our people are also constantly asked to provide feedback on their work experience and we take their opinion very seriously. To guarantee our people safety, when Revolut asks for their feedback it is set to be anonymous as default.

Further, we have the Global Whistleblowing Policy to encourage employees to play a key role in preventing and detecting wrongdoings within the company.

Below are some of the commitments that Revolut Brazil takes on together with Revolut global.

Our Commitment Towards Positive Social Impact.

Diversity and Inclusion.

- Inclusion of people aged 6-17 with Revolut <18. With Revolut <18, parents can manage their kids' financial integration with strong security systems and trusted partners. This is another step closer to financial inclusion and education for all.
- Work environment. Only by seeking out diverse talent around the globe and by creating an inclusive workplace can we access the breadth of skills, abilities and creativity that we need to create exceptional and innovative products and services for our customers. We strongly believe that an inclusive working environment enables everyone to realize their full potential and to deliver outstanding service to our customers. We continually strive to use all the experiences that our employees bring with them to influence and shape our decision making process. We are an equal opportunities employer and we aim to recruit, train and promote based on individual aptitudes and skills.
- HR Conducts internal efforts to get to know it's employees and make DEI more effective. There are some **guilds** established across the company that focus on empowering diversity, equity and inclusion. The guilds are diverse in themes as stated on the [website](#).

Constant innovation. We partner with diverse community organizations and academic institutions to connect with members, students and alumni spanning a huge range of backgrounds and geographies. We're always innovating, supporting big ideas wherever they come from. We never settle when it comes to increasing diversity, inclusion and a sense of belonging at Revolut.

Modern Slavery and Human Trafficking Statement. The Revolut Group ("Group") and its member entities are regulated financial institutions and oppose all forms of slavery which consists of but is not limited to; human trafficking, drug trafficking, sex trafficking, and unpaid labour. We make this statement to set out the steps the Group takes to adhere to the requirements of the Modern Slavery Act 2015 and to reflect a

drive to eradicate modern slavery in commercial organizations within our supply chain.

Borderless Transparent Economy in an User-Friendly App. Our mission is to unlock the power of a borderless economy, for everyone.

Financial services are the backbone of our society, and our goal is to make them work for as many individuals and businesses as possible. We want to grow the global economy by providing everyone with frictionless, accessible financial products.

To do so, we're building a borderless, customer-centric platform which feels personal to everyone and will serve as their trusted companion to manage and grow their money.

We'll support our customers throughout their lives - from teens to retirement – as individuals, groups, and families. And we can offer all the tools they need to easily manage, spend, borrow, invest, and protect their money. All in one personalized, simple space that looks and feels local at home and abroad.

We'll also continue empowering businesses with the tools they need to start, run, and scale. In practice, this means enabling them to control their spending and minimize cost, accept payments, and manage their balance sheet and employees.

Eventually, we aspire to build products and experiences at the intersection of our Consumer and Business ecosystems, unlocking seamless value for both.

Financial education products. We are committed to providing people with features to send, spend and save smarter. Examples of measures towards that goal is the ease to send and receive money with a few taps, analytics on the customer spendings, the possibility to stash money on Vaults and the visibility of subscriptions that are being charged monthly.

2.3 Governance

To think about corporate governance in SECR means aligning our interests with the optimization and sustainability of our processes, operations, policies and people in general. This optimization comes from the moment we take into account aspects of sustainability and longevity of our business, all linked to global best practices.

Revolut Brazil's commitment to the early identification of risks and opportunities enables conscious decision-making for the company and our impact in the world.

Therefore, we commit ourselves to adding the SECR agenda to the company's management meetings and putting our best efforts forward to keep improving our SECR Policy regularly.

This initiative will be led by an appointed director, before the Brazilian Central Bank and we are committed to a governance structure that will provide conditions for the exercise of the following activities:

- implement the actions within the scope of the SECR Policy;
- monitor compliance with the actions established in the SECR Policy;
- evaluate the effectiveness of the implemented actions;
- verify the adequacy of the established socio-environmental risk management in SECR Policy;
- identify any deficiencies in the implementation of actions;
- reporting to the Management Board and Supervisory Council to monitor the progress with SECR risk management enhancements, and
- disclosing internally and externally and keeping reports and documentation related to SECR management available for the Brazilian Central Bank for a period of at least 05 (five years).

3. Governance

3.1 Roles and responsibilities

The Brazil Executive Risk Committee (BR-ERC) is responsible for the overall oversight of SECR principles.

3.2 Reviews and approvals

This policy is reviewed annually or as needed. Material changes are approved by the Executive Board or an appropriate decision-making body. Local level approvals are sought for any addenda.

4. Complying with the document

The management of Revolut Brazil will ensure that the Policy will be integrated with other policies of the organization, such as the risk management policy, credit risk policy, and human resource policies.

5. Key definitions

SECR (Social, Environmental, and Climate Responsibility): A set of standards for a company's operations that socially conscious investors use to screen potential

investments.

Environmental Risk: Potential harm to the environment resulting from the company's operations.

Social Impact: The effect of an organization's actions on the well-being of the community.

Governance: The system of rules, practices, and processes by which a firm is directed and controlled. Provide a list of definitions mentioned in the policy.