

Code of Ethics and Conduct

Doing Business the Right Way



Table of Contents

A Letter from Chief Executive Officer Jeff Noordhoek	4
Mission, Vision, and Purpose	5
<i>Our Mission: What We Do</i> We serve our customer, associates, and communities.....	5
<i>Our Vision: Where We're Going</i> We make dreams possible.	5
<i>Our Purpose: Why We Exist</i> We live to serve others.....	5
Core Values and Guiding Principles.....	6
Supported by Five Pillars of Character.....	7
Our Personal Responsibilities	8
Ethics Quick Test.....	9
Speak Up.....	10
Provide Superior Customer Experiences	12
Treat Customers Fairly, Consistently, and With Compassion.....	13
Look for Ways to Continuously Improve the Quality of Our Products and Services.....	14
Represent Nelnet and Our Products and Services Accurately	15
Follow Laws and Regulations as They're Intended.....	16
Create an Awesome Work Environment	17
Build Relationships, Collaborate, and Have Fun.....	18
Support an Inclusive Environment by Treating Everyone with Dignity and Respect	19
Contribute to a Healthy, Safe, and Productive Work Environment	20
Plan for the Unexpected.....	21
Pursue Opportunities for Diversification and Growth	22
Approach Challenges With Enthusiasm and Purpose	23
Keep Learning and Improving Every Day.....	24
Grow a Culture of Innovation.....	25
Engage Responsible Business Partners	26
Compete Fairly	27
Avoid Insider Trading.....	28
Separate Personal Interest from Business Decisions	29
Decline Inappropriate Gifts and Entertainment	30
Reject Bribery and Corruption	31
Communicate Openly and Honestly	32
Share, Ideas, Feedback, and Information	33
Keep Clear, Accurate, and Complete Business Records.....	34
Protect All Nelnet, Customer, and Associate Information Like It's Your Own.....	35
Leverage AI Tools in an Ethical and Principled Way	37
Give Back to the Communities in Which We Live and Work	38
Represent Nelnet Positively in All Business and Personal Interactions.....	39
Give Back and Make a Difference.....	40



Embrace Ways to Conduct Business that Positively Impact Society 41

A Letter from Chief Executive Officer Jeff Noordhoek

At the heart of Nelnet is a commitment to serve others—whether through superior customer experiences, creating an awesome work environment, or giving back to our communities. The *Code of Ethics and Conduct* ensures our actions align with these commitments and uphold our Core Values—by doing business the right way.

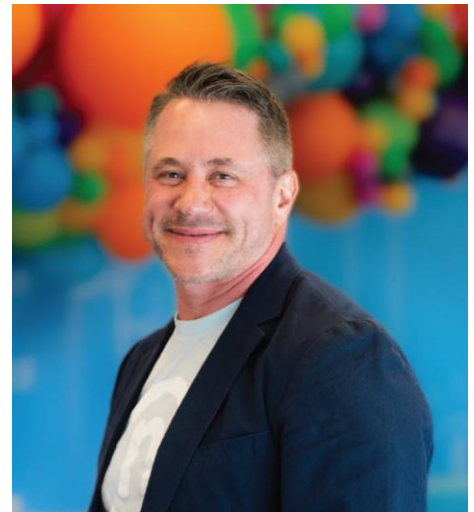
These principles guide every decision we make. By adhering to this Code and living our Core Values, we demonstrate our commitment to doing what is right, creating a culture of collaboration, trust, and mutual respect. This is essential for making a positive impact on the lives of our customers, associates, and communities.

Following this framework is not merely about compliance but about taking personal responsibility for maintaining the strong reputation and relationships we've earned. In all interactions—whether with customers, colleagues, or communities—we must act with fairness, honesty, and respect. The Code serves as a reminder of our collective obligation to uphold these ideals in every decision, no matter how big or small.

I encourage you to become familiar with our Code, Core Values, *Associate Handbook*, and supporting policies. You'll find links to these resources on the homepage of the Nelnet Portal. It's our responsibility to our customers, our associates, and to the communities in which we live and work to act with purpose and integrity in every situation, maintaining the highest ethical standards. By staying committed to practicing these beliefs, we continue to build an organization we can all be proud of—fulfilling our mission of serving others and making dreams possible along the way.

If you experience or are aware of a situation that is not in line with our Code or policies, please reach out to your direct leader or next-level leader. Together, we must remain committed to our Core Value of open, honest communication—whether it's to praise someone's hard work, share a business idea, or report a situation that could perhaps result in harm or be in conflict with our moral obligations.

I am committed to living our beliefs and values, and I trust you are too.



“**Nelnet was founded on one simple idea: serve others and make their dreams possible.**”

- Jeff Noordhoek, Nelnet's CEO

Mission, Vision, and Purpose

Our Mission: What We Do

We serve our customer, associates, and communities.

Our Vision: Where We're Going

We make dreams possible.

Our Purpose: Why We Exist

We live to serve others.



Core Values and Guiding Principles



Provide Superior Customer Experiences

- Look for ways to continuously improve the quality of our products and services.
- Represent Nelnet and our products and services accurately.
- Treat customers fairly and consistently in all interactions.
- Follow applicable laws and regulations as they're intended, and comply with internal policies.



Create an Awesome Work Environment

- Respect your coworkers and help create a great place to work.
- Build relationships, collaborate, and have fun.
- Support an inclusive environment by treating everyone with dignity and respect.
- Contribute to a healthy, safe, and productive work environment.
- Plan for the unexpected.



Pursue Opportunities for Diversification and Growth

- Be open to and prepared for new opportunities to support our commitment to diversification.
- Approach challenges with enthusiasm and purpose.
- Keep learning and improving every day.
- Engage responsible business partners.
- Compete fairly.
- Separate personal interests from business decisions.
- Act ethically to preserve our reputation and position us for continued growth.



Communicate Openly and Honestly

- Be truthful in interactions and communications.*
- Share ideas, feedback, and information.
- Keep clear, accurate, and complete business records.
- Protect Nelnet, customer, and associate information like its your own.



Give Back to the Communities in Which We Live and Work

- Help make your community better.
- Represent Nelnet positively in business and personal interactions.
- Give back and make a difference.
- Embrace ways to conduct business that positively impact society.

* For U.S.-based associates, nothing set forth in this document or our corporate policies is intended to interfere with any rights employees may have under Section 7 of the National Labor Relations Act or other federal or state law to engage in concerted protected activity or to discuss the terms of their employment or working conditions with, or on behalf of, coworkers, or to bring such issues to the attention of management at any time. Similar rules may be applicable to Nelnet's international associates.

Supported by Five Pillars of Character

Each of our Core Values is deeply intertwined with our Five Pillars of Character, demonstrating that our principles are not just abstract ideas but actionable guidelines for behavior and decision-making.



Fairness

- Play by the rules.
- Be open-minded and listen to others.
- Treat all people fairly.



Respect

- Be open and accepting of differences.
- Handle difficult situations and disagreements peacefully.
- Be considerate of the feelings of others.



Trustworthiness

- Don't deceive, cheat, or steal.
- Be reliable—do what you say you'll do.
- Have the courage to do the right thing.
- Build a good reputation.



Responsibility

- Always do your best.
- Think before you act—consider the consequences.
- Be accountable for your words, actions, and attitudes.



Citizenship

- Do what you can to make your community better.
- Stay informed about industry and political matters.
- Be a good neighbor.
- Protect the environment.

Our Personal Responsibilities

We're All Responsible

All our work must comply with our *Code of Ethics and Conduct*, our policies, and laws and regulations. It is our individual responsibility at work to understand these policies and make decisions that align with their intended goals. Beyond adherence to policies, our *Code of Ethics and Conduct* is about being fair and ethical in our interactions. When working with customers and internal colleagues, we must fully engage, treat people fairly, and respect others' opinions. Our *Code of Ethics and Conduct* applies to and serves as a guide for each of us—all full-time, part-time, or temporary associates (including associates of our subsidiaries), board members, vendors, business partners, and the businesses we invest in.

Leading With Integrity

No matter an associate's role or job title, no matter the business segment or business line, we are all leaders of ethical integrity at Nelnet and are held to the highest standards as such. There simply is no other way to do business—or to treat others.

The culture of Nelnet influences our actions, and, in turn, our actions influence Nelnet's culture. Every associate is responsible for contributing to and strengthening Nelnet's reputation for honesty and fairness; and leaders have the added responsibility of exemplifying and reinforcing those positive contributions. This includes ensuring teams know and understand Nelnet's *Code of Ethics and Conduct* and the guidelines within are followed consistently and fairly. Moreover, people leaders are expected to "walk the talk" by leading by example and authentically inspiring others to do the same.

This can only be achieved by being consistently present, as well as accessible, to associates. The best leaders receive respect and trust by earning both. As diverse as Nelnet is today, we remain one team united in our Mission, Vision, Purpose, and Core Values. Together, we can continue making dreams possible—the right way.

Nelnet's reputation is built one decision at a time by each of us, every day. Our ethical actions will preserve our reputation and position us for long-term, continued growth.

“It takes 20 years to build a reputation and five minutes to ruin it. If you think about that, you'll do things differently.”

- Warren Buffett
Investor, Philanthropist, CEO of Berkshire, and 'Oracle of Omaha'



Ethics Quick Test

Making Ethical Decisions

Each of us may face tough decisions from time to time. When faced with one, start by reflecting on our Core Values, *Code of Ethics and Conduct*, *Associate Handbook*, and policies, which are designed to guide our decision-making. Check out the following Ethics Quick Test for additional guidance, and if you're still unsure, reach out to your direct leader for advice.



Not sure what to do? Ask yourself these questions.

- Is it legal, and does it comply with our policies?
- Does it reflect our Core Values and brand, and does it enhance our reputation?
- Is it something I'd be proud of?
- Would it be perceived as positive by our customers and the general public?
- Is it the right thing to do?

If you answer “no” to any of these questions—or if you have doubts—**don't do it**. If you see someone else doing it, **speak up. Do the right thing.**

Speak Up

See Something, Say Something

We stand by our Core Value of communicating openly and honestly, both when it comes to communicating about the good things we see and potential issues or concerns.

Recognize Fellow Associates

- Publicly say “thank you” or recognize hard work at meetings.
- Give kudos for achievements in meetings or by emailing the associate and their leader.

Share an Idea

- Discuss ideas with your teammates. You might find they have encountered similar issues and can provide insight, which leads to more robust solutions and improvements.
- Bring your idea to your leader. They can help you refine the idea and get it in front of the right people.
- You’re also encouraged to bring forward new business ideas and business process improvements—submit your idea on the Nelnet Innovation site any time.



“**People need to feel safe to be who they are—to speak up when they have an idea or to speak out when they feel something isn’t right.**

- Eunice Parisi-Carew
American Businesswoman, Author,
and Management Consultant

Voice Your Concerns

There are three ways to speak up about an issue or concern.

- Talk to your direct leader. Your leader will help research, and if necessary, develop a plan to correct the situation or will bring the concern to another leader for advice.
- If you’re not comfortable bringing your concern to your direct leader or don’t get the response you think the situation deserves, talk to any senior leader or People Services (via the Nelnet Service Portal). You can also use Anonymous Incident Reporting on the Nelnet Portal to share your concern or ask a question about how our Code applies to a specific situation. Your concerns and questions will be treated in a confidential manner.
- Even though we require you to keep Nelnet information confidential, if you identify or suspect cases of waste, fraud, or abuse and you believe the identified issue has not been adequately addressed by Nelnet management, you may report the issue to a federal or state agency authorized to receive such information.

Zero Retaliation

What is retaliation? It can take many forms, including but not limited to bullying, abuse, being excluded, getting demoted or blocked from promotion, being reassigned or terminated, or having your pay or incentives cut.

We do not tolerate retaliation in any form against anyone, including in connection with speaking up in good faith about allegations of what might be an ethics violation; participating in an investigation of illegal conduct, inappropriate behavior, waste, fraud, or abuse of government funds; or raising questions about particular business decisions, actions, or any other serious issue.

We're committed to investigating retaliation allegations. Anyone who engages in retaliatory behavior will face disciplinary action, up to and including termination. If you believe you or someone else is experiencing retaliation, speak up via Anonymous Incident Reporting on the Nelnet Portal. Note that associates should not knowingly make false accusations to avoid consequences for behavior or performance issues; these will not be tolerated and may result in disciplinary action, up to and including termination of employment.

We are committed to providing an environment free of discrimination, harassment, bullying, threatening behavior, or abusive conduct in any form. We will not tolerate harassment of our associates by anyone, and we won't tolerate our associates harassing anyone. If you experience or see harassment, please speak up—contact People Services or use Anonymous Incident Reporting.

Open, honest communication is one of our Core Values. It guides how we conduct our business. We strictly prohibit retaliation against any associate who speaks up or participates in an investigation.

Q: *I believe my coworker may have violated a company policy, so I'd like to share my concern via Anonymous Incident Reporting. Is it okay to give my name?*

A: *You can if you like, but it's not required. If you want to stay anonymous, you can select an option to do so, which supports anonymous messaging and allows you to update and add information. Whether you choose to share your name or not, your concern will receive prompt attention from the area best equipped to investigate—usually People Services, Legal, or Audit Services. Your concerns will be treated with confidentiality and won't be ignored.*

Provide Superior Customer Experiences



Do what's best for our customers by making them our top priority



Pillar of Character: Fairness

- Play by the rules.
- Be open-minded and listen to others.
- Treat all people fairly.



Treat Customers Fairly, Consistently, and With Compassion

At Nelnet, we treat customers fairly, consistently, and with compassion to avoid even the appearance of discrimination. With respect to lending and servicing, we meet fair lending requirements to ensure consumers are free from any prohibited discrimination. Follow our policies and procedures to ensure we treat customers consistently and make business decisions with the customer's best interest in mind.

Complaints, when dealt with quickly and professionally, are an opportunity for us to improve our products and services. When handling complaints, we must:

- **Record the process.**
Recognize, log, and track each complaint. Keeping thorough records promotes the best possible customer experience. Failure to follow these procedures could expose Nelnet to reputational damage, lawsuits, and regulatory penalties.
- **Deliver on your promises.**
Follow up with the customer to ensure a resolution.
- **Move quickly but responsibly.**
A responsive approach will impress customers and enhance their perception of Nelnet. Involve the Legal team (via the Nelnet Service Portal) if the complaint alleges fraud or suggests that illegal or unethical behavior has occurred. Follow established Nelnet escalation procedures.

Be alert for situations that could compromise our reputation, including on social media (see the *Social Media Guidelines Overview* for details). If you see something that could negatively affect the quality of the Nelnet brand or our reputation for protecting consumer rights, report it immediately to your direct leader and Nelnet.Communications@Nelnet.net.

For more information about responding to complaints, read the *Customer Inquiries and Complaints Policy*.

We protect our customers' rights. Each interaction should reflect the importance and value we place on our customers and their business.

Q: *A customer is complaining about the high interest rate on their loan and has asked for a reduction. Nelnet doesn't have the authority to change the rate, and there's no complaint about our customer service. How should I proceed?*

A: *Treat the customer professionally and listen to their concerns with empathy and compassion. Even when our options for resolution are limited, you can provide a responsive, caring approach to let the customer know they have been heard. If available, offer alternative solutions that are in the best interest of the customer.*



Look for Ways to Continuously Improve the Quality of Our Products and Services

Each of us touches a product or service in some way, and everyone you work with is a customer. This includes your coworkers. Keep these points in mind when providing customer service.

- **Listen for what matters to the customer.**
To provide exceptional products and services as well as great customer service, we must know and understand our customers' needs. We do this by being attentive listeners and seeking constructive feedback.
- **Ask the extra question(s).**
Listen for the key information that allows you to give a more thorough answer. Identify the problem and provide the best solution. Avoid making assumptions and don't limit answers to solely the initial questions asked.
- **Think like an entrepreneur.**
Seek better, more efficient ways to serve our customers.
- **Share best practices.**
It is everyone's responsibility to follow best practices and share updated procedures with fellow associates.
- **Adhere to quality standards.**
Customers evaluate us based on the quality of our products and services and our customer support. Therefore, we must adhere to our quality standards, set clear expectations, and not release substandard products or services that could impact our customers or harm our reputation.
- **Own the experience.**
At any given time, YOU represent everything about Nelnet or our clients to the customer. Assume full ownership of this responsibility. Follow through on your commitments and follow up to ensure expectations were met.

We're dedicated to providing superior customer experiences and committed to maintaining our customers' trust by offering high-quality products and services.

Q: *Every day I come in and do my job. Some parts of what I do seem duplicative, resulting in too many steps and slower responses to customers. With some small procedural changes, we could speed up our service, give customers a better experience, and become more efficient, too. Should I mention this to my direct leader?*

A: *Yes, absolutely. Nelnet is always trying to find new and better ways to do things, both to improve processes and customer service and to increase efficiency. You're the expert at your job, and we rely on your valuable feedback to make continuous improvements.*

Represent Nelnet and Our Products and Services Accurately

Our products and services touch millions of lives every day, so we work hard to ensure our actions reflect our high ethical standards. Our communications with external entities, customers, and clients must be truthful, understandable, and comply with applicable laws and regulations. In addition, we should portray our products and services accurately.

- **Never overstate or misrepresent.**
Be truthful about what we offer.
- **Never mislead or make deceptive statements.**
Ensure materials, presentations, and descriptions are accurate.
- **Keep the customer's interests at heart.**
Don't sell products or services that fail to meet the customer's needs. Acknowledge the customer's objectives, finances, and individual circumstances.
- **Be clear.**
Provide relevant and complete information so customers and clients have the best choice of product options. Make every effort to ensure they understand the product and any associated risks, and make sure any claims made are substantiated.
- **Deliver on promises.**
When we say customers are our top priority, we mean it. Follow through with your responsibilities and commitments.

We must comply with advertising and brand standards established by Nelnet Corporate Marketing and Communications and ensure customer-facing messages are reviewed by AskCompliance@Nelnet.net before they are distributed.

Present our offerings as they are, and be truthful about what we can deliver.

Q: *Customers keep asking me for a feature that we don't yet have. But I know from several meetings and hallway conversations that Nelnet is contemplating some enhancements that would really help these customers. To keep customers happy now, can I tell them that these enhancements will be available to them soon?*

A: *No. To create long-term customer relationships and operate with integrity, we must be honest and let customers know we do not have these enhanced services today. You may be able to share that we are considering modifications that will improve the product/service, if such information has been approved to share with our customers. We must be careful not to share inside information prematurely.*



Follow Laws and Regulations as They're Intended

Laws and regulations like the Fair Credit Reporting Act and the Electronic Fund Transfer Act were established to protect customers' rights and interests. Our consumer protection policies and *Compliance Management Policy* help ensure we do everything we can to protect the rights of our customers. Nelnet's compliance documentation library, The Nelnet Source, provides guidance on relevant laws/regulations, including policies and other directives. It's up to each of us to become knowledgeable and comply with applicable national, regional, and local laws, regulations, policies, standards, and procedures that apply to our position and responsibilities.

To ensure we understand and comply with industry laws and regulations, Nelnet leaders actively communicate new and changing regulations to the business segments and provide ongoing training to help us understand our responsibilities. We should take full advantage of this training and also seek additional training to improve within our current position and prepare us for future positions.

In addition, we are committed to working with business partners, suppliers, and other third parties who share our commitment to compliance. How our business partners operate directly affects our business. If you are selecting or reevaluating a business partner, make sure they understand our responsibilities and be vigilant to anything that could compromise our standards and reputation.

Each of us must strive to act with integrity and honesty in all circumstances and with all parties. It is also our responsibility to speak up about any perceived violation of laws, regulations, and policies to management or via Anonymous Incident Reporting on the Nelnet Portal.

We must comply not only with the exact wording of applicable legal and regulatory requirements, but also with the underlying principles that protect our customers.

Q: *It's late in the day, but I have some paperwork to finish before I can go home. If I don't follow my team's documentation exactly, I can close out my last customer concern quickly. Can I take a few shortcuts, just this once?*

A: *No. Each one of us is responsible for compliance. Our policies, standards, and procedures—all the way down to the work guides that support them—exist to protect our customers, clients, and ourselves. Bypassing approved processes can put Nelnet at risk and harm our customers. Always follow documented processes and the workflow you learned from your training team. If you have concerns about the process or think it can be improved, discuss your ideas with your direct leader.*



Create an Awesome Work Environment



Respect your coworkers and help create a great place to work.



Pillar of Character: Respect

- Be open to and accepting of differences.
- Handle difficult situations and disagreements peacefully.
- Be considerate of the feelings of others.



Build Relationships, Collaborate, and Have Fun

We believe building strong relationships at work is the foundation of helping us accomplish our collective goals. We are one team representing many ideas, thought processes, experiences, and backgrounds—and we value the contributions each of us makes to Nelnet's success.

With our hybrid work model, we recognize the importance of effective collaboration. Nelnet's work environment is aimed at ensuring a consistent in-office presence for those who live near an office—with the purpose of enhancing teamwork, strengthening relationships, and reinforcing our company culture. While we value the flexibility that occasional remote work provides, we believe that by increasing opportunities for face-to-face interactions, we achieve even greater success.

Still, Nelnet wholly supports and values the contributions of our fully remote associates who do not have access to an office location in their region. We remain committed to:

- Investing in technology, resources, and communication tools to maintain a productive, collaborative work environment.
- Providing associates access to growth opportunities, resources, and professional development regardless of their location.

While it's not possible to create the exact same work experience for in-office, hybrid, and fully remote associates, we do believe we can create and maintain a great, collaborative, hybrid work environment that supports all associates and promotes our Core Value of making Nelnet an awesome place to work. By fostering an atmosphere of trust and open communication, we can work together to share our thoughts and refine our best ideas to achieve great results, no matter where we're working.

Along the way, we also have fun! From team-building events to associate appreciation activities to innovation opportunities, there are plenty of offerings to get to know your colleagues outside of the work you do. Take advantage of these opportunities—whether in person or online—to build friendships and trust with your colleagues. Our teams and our work will be stronger for it.

Great achievements at work are grounded in healthy and collaborative relationships with colleagues.



“Alone we can do so little; together we can do so much.”

- Helen Keller
American Author, Disability and Social Rights Advocate, and Lecturer



Support an Inclusive Environment by Treating Everyone with Dignity and Respect

At Nelnet, we strive to provide a work environment where associates feel welcome, respected, and supported to thrive and do their best work. This means fostering an environment grounded in open communication, collaboration, trust, and mutual respect—where individuals feel safe speaking up, contributing ideas, and being themselves at work.

We do not tolerate discrimination, prejudice, harassment, bullying, or violence of any kind, including threats, intimidation, or hostile behavior. Creating a respectful, professional workplace is a shared responsibility, and each of us plays a role in shaping how others experience Nelnet.

We support this commitment by:

- Working respectfully across differences in background, experience, perspective, skill, and ability, and by making reasonable accommodations when needed (including for accessibility).
- Practicing cultural competence—the ability to interact effectively with people from a variety of cultures and life experiences—by being aware of our own perspectives, learning from others, and approaching differences with openness and respect.
- Treating colleagues, customers, and business partners with patience and professionalism, even when viewpoints, opinions, or beliefs differ from our own.

Everyone at Nelnet is expected to understand what constitutes discrimination, sexual harassment, non-sexual harassment, and bullying; to refrain from such behavior; and to speak up if they observe or experience conduct that does not align with these standards. Concerns can be reported to People Services (via the Nelnet Service Portal), your direct leader, or a trusted senior leader.

For additional guidance on creating and maintaining a respectful workplace, refer to the *Associate Handbook*.

We are committed to creating a respectful workplace free of discrimination, harassment, and bullying.

Q: *One of my coworkers is constantly teasing another team member and making sexually explicit jokes. The other person always appears to laugh it off, but some of the things my coworker says to her seem really wrong to me. Should I tell someone?*

A: *If the situation seems wrong or inappropriate to you, you should report it to your direct leader or People Services (via the Nelnet Service Portal). Nelnet does not tolerate retaliation against any associate who reports what they honestly believe to be instances of discrimination, harassment, or bullying.*

“ A diverse mix of voices leads to better discussions, decisions, and outcomes for everyone.

- Sundar Pichai
American Businessman,
Innovator, and CEO of Google



Contribute to a Healthy, Safe, and Productive Work Environment

We strive to build a culture of wellness and an environment where each of us can be successful in reaching goals within the areas of physical, financial, professional, and personal well-being. To do this, Nelnet is committed to offering a comprehensive benefits and wellness program that is designed to support you in reaching your goals.

Benefits, paid time away from work, and wellness programs are provided in accordance with applicable local laws, regulations, and company policies, which may vary by country or location. Having a positive work-life balance and being healthy and happy provide the foundation for building a high-performance environment where we can make clear, good decisions every day.

We are committed to safeguarding the health and safety of our associates, visitors, contractors, and the general public. To do this, we must:

- Comply with applicable national, regional, and local health and safety laws and regulations, and Nelnet's corporate and business segment health and safety policies.
- Create a supportive environment that promotes overall health and well-being, providing tools and resources necessary for maintaining a clear mind, positive attitude, and open communication.
- Maintain a drug-free workplace by prohibiting associates from reporting to work under the influence of drugs or alcohol; and act responsibly during Nelnet social events where alcohol may be present.
- Assess health and safety impacts and issues before starting new projects.
- Eliminate unreasonable health and safety risks at company facilities.
- Report potential workplace safety issues such as blocked fire or emergency exits and exposed or unsafe wiring.

Read the *Associate Handbook* for details about our anti-harassment, anti-discrimination, drug-free workplace, and related policies. Reach out to your leader if you have any questions.

Our greatest asset is our associates. We all work with a high standard of excellence, and in doing so, encourage every associate to prioritize personal well-being.

“ I strongly believe that you can't win in the marketplace unless you win first in the workplace. If you don't have a winning culture inside, it's hard to compete in the very tough world outside.

- Douglas Conant
American Businessman, Author,
Philanthropist, and CEO of
ConantLeadership



Plan for the Unexpected

Whether it's a global pandemic, weather-related events, or the ever-changing and complex use of technology networks, businesses are more susceptible than ever to a variety of existing and emerging risks. To help manage these risks and plan for the unexpected, Nelnet's Business Continuity Management program provides a framework designed to identify mission-critical business functions and processes and define organizational resilience strategies, recovery objectives, business continuity practices, risk management considerations, and standards for communicating. In addition, Nelnet has a dedicated Emergency Response team—with designated representatives at each office location—to assist where necessary.

Because of these efforts, Nelnet has become more resilient to threats and adaptable under pressure. In recent times, we've proven our ability to respond to unexpected events with flexibility, allowing us to serve our customers and protect our associates under difficult and abnormal conditions.



Companies today face unprecedented events that can disrupt business operations. While we can't stop them from happening, preparation and planning enable us to manage them more effectively.

Q: *What can I do to be more prepared?*

A: *Familiarize yourself with your site's Emergency Response Plans, which are available on the Nelnet Safety Program page of the Business Continuity Management site. You can also reach out to your Emergency Response team representatives.*



Pursue Opportunities for Diversification and Growth



Be open and prepared to support our commitment to diversification.



Pillar of Character: Trustworthiness

- Don't deceive, cheat, or steal.
- Be reliable—do what you say you'll do.
- Have the courage to do the right thing.
- Build a good reputation.



Approach Challenges With Enthusiasm and Purpose

We value challenges because they help us to define our current limits, and then we find ways to push past them. Approach a challenge just like a project. Do your research, create a plan, set goals, understand the risks and rewards, measure progress, and celebrate small victories along the way.

Be open, receptive, and supportive of change initiatives. We can all embrace change and challenges productively in a variety of ways:

- **Communicate openly and frequently.**

It is human nature to crave information when facing change or challenges—and in these situations, clear communication is essential. Share information whenever possible. Ask the extra question(s). We won't always have all the answers, and that's okay. Just acknowledge it and work through issues together. If you have concerns and questions, speak up. Keep the lines of communication open in all directions.

- **Share your ideas.**

Be proactive and think about how you'd like to solve a problem, meet a challenge, or improve our customers' experience. Bring these ideas to your leader or submit them via our Nelnet Innovation site. Be open to the fact that you might not have the one right answer, but know your contribution helps move us in the right direction. The best solutions are often a combination of different people's ideas.

- **Value everyone's input.**

Everyone's voice matters. When someone shares an idea, acknowledge and appreciate it. Listen to and understand the range of differing opinions, ideas, and possibilities. Our goal should be to make sure everyone feels heard and empowered.

- **Understand hesitancy to change.**

Put yourself in other people's shoes, ask questions to see their point of view, and then discuss and address their hesitation. When we're unsure about change, feeling valued, supported, and understood goes a long way.

- **Act with a sense of urgency.**

Acting with urgency does not require anxiety. Develop an awareness and sensitivity for finding potential issues before they have time to become critical. Talk about the vision and benefits of making forward progress; create peaceful progress by maintaining a steady, calm, and upbeat demeanor.

We embrace change. Change can bring challenges. Meeting these challenges helps us to grow, both as individuals and as an organization.

“Don't limit your challenges; challenge your limits.”

- Jerry Dunn
Athlete, Philanthropist, and
'America's Marathon Man'



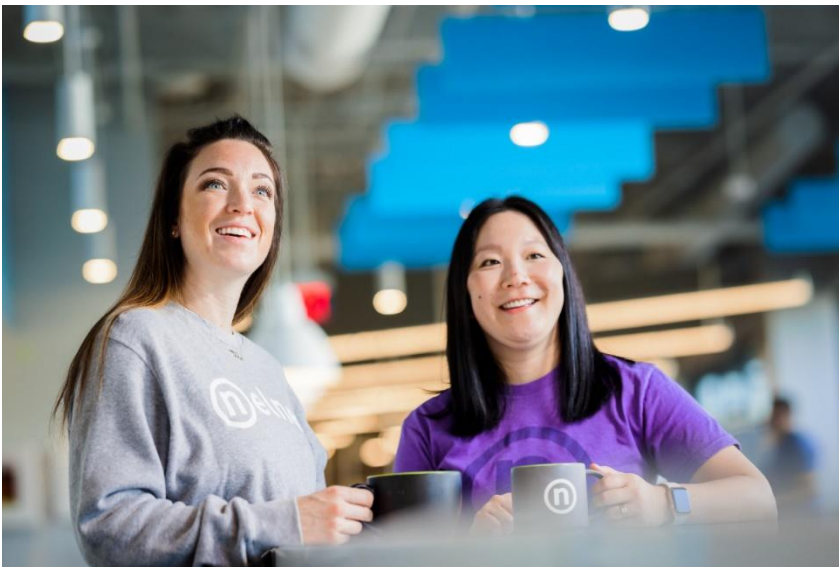


Keep Learning and Improving Every Day

Only through continued learning and development will we reach our maximum potential and keep up with a quickly changing world—both as individuals and as an organization. Nelnet values a continuous learning environment and wants you to take advantage of all the personal and professional development opportunities that are available.

No matter where you are in your career or your aspirations, there are many resources and tools to help you improve today and prepare for the future. Your leader can help identify learning opportunities so you can participate in relevant professional development to gain new skills and capabilities. Whether it's through on-the-job training, career development offerings, offsite training, the Nelnet Mentorship Program, associate resource groups, or Workday Learning, there is truly something for everyone.

To explore available training opportunities, visit the Nelnet Portal or log in to Workday and click on the Learning icon. Here, you can browse a variety of courses, along with your Learning History, Learning Calendar, and so much more.



We must strive to grow personally and professionally. Your efforts lead to greater opportunities for you and Nelnet.

Q: *I would like to go back to school and finish my accounting degree. Will Nelnet's Tuition Assistance Program cover some of these costs?*

A: *Most likely. Supporting continual learning and growth is a top priority at Nelnet. Here's how the program works:*

Nelnet has a robust Tuition Assistance Program, and full- and part-time associates who have completed six months of employment are eligible. Nelnet's Tuition Assistance Committee must approve degree programs, non-degree seeking individual classes, or certificate programs prior to the start date of classes. Associates who receive approval will receive full or partial tuition reimbursement, up to \$5,250 per year, for courses in which they receive a grade of B- or higher, as well as 80% reimbursement for book expenses, if applicable.



Grow a Culture of Innovation

Have a potential big idea or opportunity that could drive value, improve Nelnet, or disrupt an industry? Check out the Nelnet Innovation site, where you can learn more about the process, tools, and resources available to move new ideas forward, faster.

New technologies, markets, and business models, a changing workforce, and global competition drive transformation, encouraging companies to adapt, change, and execute at ever-increasing speeds. The rapid rise of artificial intelligence (AI) tools and machine learning is just one recent example. To remain successful, Nelnet must invest in and nurture new business models while continuing to optimize and grow our existing core businesses. That's why we've developed dedicated innovation resources for our associates. The Nelnet Innovation site is designed to serve as a guide to help associates seed, seek, and scale their new business models and innovation initiatives.

Associates are encouraged and empowered to bring forward their ideas that might help us to achieve this goal. Nelnet also actively invests in innovative startups outside the organization. We aim to identify key insights, incubate new ideas, and ultimately use technology to create opportunities where we live, learn, and work.



We believe in growing a culture of innovation, complete with the tools, tactics, and mindset to be able to adapt to rapid change.

“The only way you survive is you continuously transform into something else. It's this idea of continuous transformation that makes you an innovation company.

- Ginni Rometty
American Businesswoman
and Former Chairman,
President, and CEO of IBM



Engage Responsible Business Partners

Throughout the course of business at Nelnet, we work with business partners, vendors, suppliers, and other third parties in many ways. This includes any relationship with a company whose product or service we use—even for things as common as software or application programming interface (API) integration. Whom we work with and how they operate affects our reputation, our business, and the customer experience we offer.

Follow these important practices when seeking a new business partner or reevaluating a current one.

- **Adhere to our *Third Party Risk Management Policy and Technology Procurement Policy* (which is part of the *Travel and Expense Policy*).**

We must understand and plan for the potential risks of doing business with a third party. Notify ThirdPartyRiskManagemen@Nelnet.net when starting to plan for a new business partner relationship.

- **Research and evaluate the potential partner.**

Before selecting a business partner and entering into a contract, complete due diligence to determine if they are reputable and are able to perform in compliance with applicable laws, regulations, and security standards.

- **Set expectations and monitor performance.**

Ensure important requirements like regulatory compliance, security standards, and service levels are in the contract and adhere to our Contract Signing Authority and Purchase Approval Policy when signing a contract or agreeing to terms and conditions. Once a contract is in place, keep track of the business partner and their product or service to make sure they meet our expectations. If they don't, work with them to make improvements.

We have a responsibility to work with business partners who share our commitment to compliance, security, and integrity—and who uphold our high ethical standards.

Q: *I learned one of our business partners has been accused of bribing a customer. It hasn't been proven and doesn't involve Nelnet. Should I do anything about it?*

A: *Yes. Any potential violation of the law or Nelnet's standards by a business partner is a cause for concern. You should speak up to management or via Anonymous Incident Reporting on the Nelnet Portal.*



Compete Fairly

Competition is healthy, and it helps us become better at our business. One of our Core Values is to pursue opportunities for diversification and growth, which means we have a presence in many different sectors. Even with our aggressive goals, we must act fairly and legally toward the competition.

To promote fair business practices and competition, Nelnet complies with applicable antitrust and competition laws. Violations of such laws can result in severe legal penalties for Nelnet and criminal charges for associates involved. This means we must, among other things:

- Focus on providing superior customer experiences—don't try to improve our standing by speaking ill of our competitors.
- Only use legitimate means of obtaining competitive information.
- Never misrepresent competitors' products or services.
- Respect our confidential information and intellectual property rights and those of our competitors and other third parties.
- Never enter into agreements or discussions with competitors that could be seen as attempts to rig or fix prices.
- Never act in a manner that could appear as limiting Nelnet's competition or excluding potential competitors from the marketplace.

If you have questions about how antitrust and competition laws may affect your job or to report a possible violation, go to Anonymous Incident Reporting on the Nelnet Portal.



Our customers should choose us based on our superior products and services, customer service, and competitive prices.

Q: *Is all information I find about the competition illegal to have?*

A: *No. Competitive intelligence can be obtained fairly and ethically from publicly available sources like media reports, trade journals, annual reports, government filings, speeches by executives, and from customers. You should not seek out competitive intelligence by way of misrepresentation, trespassing, theft, or invasion of privacy.*



Avoid Insider Trading

Confidential information is material and nonpublic when a reasonable investor would consider it important in deciding to buy or sell stock in a company and when that information hasn't been widely shared with the public. Buying and selling stocks, bonds, or other securities based on this kind of information is considered insider trading, a violation of federal securities laws that may result in stiff punishments, including fines and prison time.

Examples of material, nonpublic information:

- Quarterly or annual earnings
- Forecasts and risk models
- Business plans and strategies
- Significant restructurings or management changes
- Potential acquisitions

We should not share such insider information with anyone outside our company—this includes family members, friends, or other parties. Doing so violates Nelnet policy and could make you liable if the party buys or sells securities based on the information you shared.

If you aren't sure whether something is considered insider information, reach out to the Legal team via the Nelnet Service Portal. For details about buying and selling Nelnet stock, refer to our *Securities Trading Policy*.

Know the rules for trading Nelnet stock. Don't share insider information, and trade only when you do not possess material, nonpublic information.

Q: *At a family reunion, my uncle, who purchased Nelnet stock last year, starts asking me questions about the company. I know we may acquire a new business this quarter that may impact future earnings, but the news hasn't been shared publicly. Can I tell my uncle about it?*

A: *No. If this acquisition is undisclosed and a reasonable investor would consider the information when making an investment decision, any information about it is material and nonpublic. If you tell your uncle about the acquisition and he makes an investment decision based on it, this constitutes as "tipping" and insider trading.*

“With enough insider information and a million dollars, you can go broke in a year.

- Warren Buffett
Investor, Philanthropist,
CEO of Berkshire, and
'Oracle of Omaha'



Separate Personal Interest from Business Decisions

You may be facing a conflict of interest—and must report it to management—if you can answer “yes” to any of the following questions, or if you are unsure.

- Do my outside interests influence, or appear to influence, my ability to make sound business decisions?
- Do I stand to benefit or gain personally from my involvement in this situation? Or does a friend or relative of mine stand to benefit or gain?
- Could my participation in this activity interfere with my ability to do my job?
- Is the situation causing me to put my own interests ahead of the needs and expectations of Nelnet and our customers?
- If the situation becomes known, would it negatively impact the trust and confidence our customers have in Nelnet?

Disclose any potential conflict by discussing it with your direct leader or submit your questions via Anonymous Incident Reporting or to AskEthics@Nelnet.net. Failure to disclose actual or potential conflicts of interest may be considered violations of our Code. Refer to the *Conflicts of Interest, Gifts, and Hospitality Policy* for more information.



We must avoid situations (conflicts of interest) in which competing loyalties lead us to pursue, or even appear to pursue, a personal benefit for ourselves, friends, or family members at the expense of Nelnet or our customers.

Q: *As a web developer, I wrote some code during my work at Nelnet that I want to publish online so others can learn from it and collaborate. Is this permitted?*

A: *Maybe, but it depends largely on the circumstances. You must get permission before sharing anything you create during your work at Nelnet because it may contain proprietary information or be considered Nelnet's intellectual property. Check with your direct leader or AskEthics@Nelnet.net first.*



Decline Inappropriate Gifts and Entertainment

Gifts and entertainment are a part of many business relationships and can take many forms: trips, tickets, quid pro quo arrangements, discounts, hotel accommodations, or anything else that is deemed to be of value to the recipient. Gifts and entertainment that are unsolicited, tasteful, not in excessive value, and are provided openly and legally are usually okay. However, problems arise when they begin to compromise or influence—or even appear to compromise or influence—business decisions.

- Corporate gifts and entertainment given and received must comply with our *Conflicts of Interest, Gifts, and Hospitality Policy*. A gift should not be cash or anything that could be converted to cash, such as gift cards.
- Consider the other party. Although a gift may appear to be in line with our Code and policies, we must also be compliant with the contracts, rules, and codes of our customers, partners, and vendors, especially when it comes to government officials. Applicable federal and state laws may prohibit or limit gifts, travel, or entertainment provided to government officials.

If in doubt, ask. If you receive a gift, want to provide a gift to a customer, or pay expenses on behalf of a customer or potential customer and feel these actions may be perceived by others as influencing either your decisions or that of the customer, be safe and reach out to AskEthics@Nelnet.net.

We must not offer, give, or accept inappropriate gifts or benefits.

Q: *A customer sent me a \$150 prepaid gift card to thank me for quickly resolving an issue for them. Can I accept and use the gift card?*

A: *No. Since the gift card can easily be converted to cash and may be perceived by others as influencing your actions for this specific customer, you cannot accept this gift. You should respectfully return the gift card to the customer. Or if you'd rather put the gift to work in your local community, you may choose to donate the gift card to the Nelnet Foundation instead—just be sure to notify your direct leader of the donation. Either way, you should thank the customer for the gesture.*



Reject Bribery and Corruption

Improper payments or bribes expose you and Nelnet to possible criminal prosecution. They should not be confused with reasonable legitimate business expenses, permitted gifts and entertainment, travel expenditures, and contributions from Nelnet's Political Action Committee. For more information about what is permitted or not permitted, contact Nelnet.Communications@Nelnet.net.

To ensure compliance with local laws and our *Foreign Corrupt Practices Act Policy*, we must not give, promise, or offer anything of value to any customer, government employee (including foreign officials or members of an official's family), or any person to influence a decision, secure an advantage, avoid a disadvantage, or obtain or retain business. Furthermore, the *Bank Bribery Act and Foreign Corrupt Practices Act Policy (Nelnet Bank)* prohibits individuals and their service providers from seeking or accepting anything of value from anyone in return for any business. We must also keep accurate records of transactions and maintain a strong system of internal accounting controls.

To prevent Nelnet from being used as a conduit for money laundering or the funding of terrorist or other criminal activities, we must comply with our *Anti-Money Laundering and OFAC Sanctions Policy* and related identity theft prevention laws and regulations. We are responsible for being knowledgeable about these laws and regulations and must report violations or suspicious activities to our Enterprise Compliance team (AskCompliance@Nelnet.net) or through Anonymous Incident Reporting on the Nelnet Portal. For questions or concerns about complying with these laws and regulations, contact Enterprise Compliance.

We must oppose bribery and corruption to prevent Nelnet from being used as a conduit for illegal activity.

Q: *My cousin, who owns a local vending machine company, will personally pay me 5% of sales if I can get Nelnet to sign an agreement with his company. Can I accept his offer?*

A: *No. This constitutes a kickback. A kickback is a form of corruption that involves two parties agreeing that a portion of sales or profits will be improperly given, rebated, or kicked back to the purchaser in exchange for making the deal. You can, however, provide his company's information to the appropriate Nelnet business leader, who can evaluate his services along with other similar companies.*



Communicate Openly and Honestly



Be truthful in interactions and communications.



Pillar of Character: Respect

- Be open to and accepting of differences.
- Handle difficult situations and disagreements peacefully.
- Be considerate of the feelings of others.



Share, Ideas, Feedback, and Information

Whether you are interacting with a fellow associate, company leader, client, vendor, or auditor, it is vital to be open, honest, and friendly. Nelnet expects each of us to be positive and professional while staying true to our Core Value of communicating openly and honestly.

Here are things each of us can do to live this Core Value.

- **Engage regularly with your direct leader and colleagues.**
Don't hold back. If you need help, don't hesitate to ask. Each of us is here to listen and assist.
- **Ask others what they think and invite diverse perspectives.**
Then really listen to what they have to say. Ask extra questions as needed to understand.
- **Share information and ideas freely.**
Freely share whenever you can, without compromising confidentiality. We accomplish the most when we share and collaborate across business units and functional groups.
- **Keep your door open—literally or figuratively.**
Warmly welcome interaction with your teammates and others around you, especially if you're a manager or leader.

Nelnet is regularly examined by internal and external auditors, clients, and regulators. Extend full cooperation to these people, including fulfilling document requests or requests to meet with regulators or lawyers in connection with a legal proceeding. During examinations, concealing a problem is strictly prohibited and may violate laws and regulations. If you discover a problem that you believe should be disclosed to an auditor or regulator or have questions about how to respond to audit or regulatory inquiries, consult your direct leader or the Nelnet leader who is managing the third-party examination.

Communicate transparently and courteously in every interaction by being clear, honest, and respectful.

Q: *I think I may have just made a significant error in my work. Should I report it or keep quiet and assume that our quality assurance will sort it out?*

A: *You should definitely speak up. We know it's not always easy, but it's the right thing to do. This is why we include open and honest communication as one of our Core Values. Your leader can help you work through errors or any other problems. And if you ever feel that your leader isn't responding fairly when you report a problem, we want you to speak up about that, too.*

Remember: *You can always tell your direct leader that you don't agree and consult another leader—being transparent with your leader when doing this is best for everyone involved. Or if you don't feel comfortable doing so and wish to remain anonymous, you can use Anonymous Incident Reporting on the Nelnet Portal.*

“ To effectively communicate, we must realize that we are all different in the way we perceive the world and use this understanding as a guide to our communication with others.

- Tony Robbins
American Author, Coach,
and Motivational Speaker



Keep Clear, Accurate, and Complete Business Records

Business records include any document or communication in paper or electronic form that is maintained in the course of business. This covers a wide range of information too lengthy to list. Follow these basic practices to help ensure the integrity of our business records.

- **Adhere to our *Information Governance Policy* and *Records Retention Schedule*.**

If we are involved in an investigation, we may be required to retain information longer than outlined in our policy.

- **Ensure the accuracy and clarity of financial statements and accounts.**

As a public company, we must fully and fairly disclose our financial condition in compliance with applicable accounting principles, laws, rules, and regulations. We must also provide full, fair, accurate, timely, and understandable disclosures. We all have a responsibility to ensure Nelnet's accounting records do not contain false or intentionally misleading entries.

- **Never falsify, omit, or conceal business records.**

We should strive to be transparent and truthful and never put our integrity at stake by misrepresenting Nelnet business records.

- **Spend Nelnet's money wisely.**

When spending money on Nelnet's behalf, make sure the cost is reasonable, directly related to company business, properly authorized and recorded, supported by appropriate documentation, and compliant with corporate policies.

- **Ensure Nelnet contracts are in writing and reflect all relevant terms being agreed upon.**

We should sign a contract on behalf of Nelnet only when authorized and properly recorded and when we've adhered to our *Contract Signing Authority and Purchase Approval Policy*.

- **Prevent fraud.**

We should not compromise our honesty and integrity by committing fraud. We should also avoid the appearance of fraud. For example, do not spend company funds without proper approval. For more information, refer to our *Fraud Policy*, and to report potential fraud, use Anonymous Incident Reporting on the Nelnet Portal.

We each play a part in ensuring Nelnet's business records meet the highest standards of accuracy and completeness.

Q: *I've looked at our Records Retention Schedule and know we're supposed to follow it, but what if I need to access something in the future that I've deleted for a business reason?*

A: *Each of us is responsible for following the Information Governance Policy and Records Retention Schedule. These policies are designed to take into account future needs and potential requests related to our records. If you have serious concerns that deleting your records could result in negative consequences for Nelnet, please speak up. Start by discussing your concerns with your direct leader. The two of you can consult AskInformationGovernance@Nelnet.net if more direction is needed.*



Protect All Nelnet, Customer, and Associate Information Like It's Your Own

Our Beliefs

At Nelnet, we act with purpose and integrity, and that includes being judicious stewards of the personal information entrusted to us by our clients, customers, associates, and business partners. Our products and services touch millions of lives every day, and we are committed to the protection and legal and ethical use of all personal information in our care. We make it our mission to protect personal information like it is our own because we believe in doing business with a purpose higher than profits.

Our Duties

The personal information we obtain throughout our course of business is subject to contractual restrictions, as well as various data privacy and security laws and regulations. Failure to follow these can lead to individual harm to consumers and associates, regulatory enforcement, financial penalties, legal action, and damage to Nelnet's reputation. Beyond personal information, our *Corporate Security Policy* includes guidelines for information classification. We must protect proprietary (business confidential) information about the business, its offices, projects, campaigns, or operations.

The privacy of the information we handle is paramount to Nelnet's success and to the safety and security of the people and institutions we serve. Familiarize yourself with our *Data Privacy Policy*, and reach out to AskPrivacy@Nelnet.net any time you're involved in a project that may have data privacy implications or to report suspected incidents regarding the potential loss, unauthorized disclosure, or acquisition of data.

What Is Personal Information?

Personal information is any information that identifies, relates to, or describes a particular client, customer, associate, or business partner.

Examples of personal information we must protect include, but are not limited to: addresses, email addresses, driver's license numbers, government-assigned identification numbers including Social Security numbers, dates of birth, customer account information, payment information, salary and other compensation information, and information relating to banking, benefits, leaves of absence, and medical history.

“ Privacy is an inherent human right, and a requirement for maintaining the human condition with dignity and respect.

- Bruce Schneier
American Author,
Cryptographer, and
Computer Security Expert



What are the requirements for handling personal information?

- Only access, collect, and use personal information as needed and allowed under applicable laws to fulfill our legal and contractual obligations.
- Secure computers, smart phones, and other mobile devices at all times.
- Transmit personal information only to authorized parties who are obligated to protect its confidentiality, and do so using authorized methods (e.g., encryption), as detailed in our *Information Security Standard*.
- Securely store, transmit, and dispose of personal information.
- Promptly report any possible privacy incidents or security risks to AskPrivacy@Nelnet.net.
- Know and follow our *Corporate Security Policy* and business security standards.
- Never download unauthorized or unlicensed software on Nelnet computers.
- Comply with our *Data Privacy Policy* and consult AskPrivacy@Nelnet.net before sharing personal information with another business segment or affiliate.
- Comply with our *Clean Desk Policy* and never leave personal information unattended on your desk or computer screen, even when you're working at home.

Our customers and associates alike are legally entitled to have the personal information they provide to Nelnet kept confidential.

Q: *A leader is visiting from another Nelnet office. They ask to use my computer to look up some information and says I don't need to bother logging out. Can I move aside and let them use my computer while still logged in to my account?*

A: *No. Even though the visitor is a leader, you still need to protect the information on your computer as if it were your own. At a minimum, you should log out first so they can log in with their own account. If the leader needs to access data, a better option would be to direct the leader to another available computer where they can log in.*



Leverage AI Tools in an Ethical and Principled Way

Artificial Intelligence (AI) is transforming the world at every level, from everyday conveniences to complex industries like Nelnet's. Integrating AI into our business is fostering innovation, streamlining processes, and enhancing productivity. However, it may also expose us to heightened risks, such as compliance, financial, operational, and model risks. We're committed to promoting the responsible and ethical use of AI, which protects the data entrusted to us and aligns with our mission and Core Values.

As we explore AI solutions, we aim to foster a culture of trust and collaboration among our associates and stakeholders, while ensuring we maintain an AI framework—detailed in our *Artificial Intelligence Governance Policy*—that aligns with industry best practices and governing regulations to protect the company, our associates, clients, and consumers.

We encourage all associates to learn more about AI and look for ways to leverage AI in our work and processes. To learn more about AI at Nelnet and to find valuable resources and learning opportunities, check out our AI Resource Center. We are confident that our commitment to responsible AI usage will not only contribute to our continued growth and success but also position us as a forward-thinking, ethical leader in our industry.

It's crucial we approach AI implementation with transparency, awareness, and an unwavering dedication to our ethical principles.

“ Artificial Intelligence is not a Man versus Machine saga; it's in fact, Man with Machine synergy.

- Sudipto Ghosh
Technology Journalist,
Author, and Former Director
of Content at iTech Series





Give Back to the Communities in Which We Live and Work



Pillar of Character: Citizenship

- Do what you can to make your community better.
- Stay informed about industry and political matters.
- Be a good neighbor.
- Protect the environment.



Represent Nelnet Positively in All Business and Personal Interactions

The Nelnet Brand

Our brand is one of the primary building blocks of Nelnet's identity. It allows us to build trust with our customers and maintain a consistent, professional appearance. All associates should be good stewards of the Nelnet brand. You should only use Nelnet's brand assets as part of your work at Nelnet—to further our purpose, vision, mission, and Core Values—while being mindful to maintain the integrity, appearance, and authenticity of the assets. Do not use the Nelnet brand for commercial or charitable purposes (or otherwise) unrelated to your job.

Media Inquiries

All media inquiries regarding Nelnet should be forwarded to Media@Nelnet.net. Corporate Communications is authorized to initiate contact with the media on behalf of the company to ensure a consistent, accurate message and to ensure communications are made in compliance with the laws, regulations, and contracts that govern our business.

Social Media

We expect associates to use good judgment, both in person, virtually, and on social media. Only authorized spokespersons may communicate on behalf of Nelnet in any media outlet, which includes online forums, bulletin or message boards, chat rooms, blogs, and other internet channels. Certain exceptions may be granted in writing by Corporate Communications. Refer to the *Social Media Guidelines Overview* for more information.

Political Activities

Outside of your work at Nelnet, we encourage you to stay informed about political issues and exercise your right to vote. We respect your right to participate in the political process, express your views, support candidates, run for elective office, and serve in a government-appointed role. Your activities must be legal, conducted on your own time, and at your own expense. Do not use company email or resources for these purposes. Ensure your personal political opinions and activities are not perceived as Nelnet's and avoid conflicts of interest. If you plan to run for office or accept a government appointment, notify and obtain approval from your direct leader and AskEthics@Nelnet.net to address potential conflicts of interest and discuss recusal procedures if needed.

We are the face of Nelnet and have a responsibility to our customers and the communities in which we work to adhere to the highest ethical standards and to encourage our fellow associates to do the same.





Give Back and Make a Difference

The Nelnet Foundation helps us live our Core Value of giving back to the communities in which we live and work. The charitable priorities of the Nelnet Foundation are education, especially scholarships, youth programs, and supporting our communities. The Nelnet Foundation matches individual associate donations of \$100 or more to schools and eligible nonprofits through the Nelnet Matching Gift Program. Associates at all levels are encouraged to volunteer in their communities through both company-sponsored and personal initiatives about which they're passionate.

Our annual United Way campaign is another way we come together as an organization to support the needs of our communities. Associate donations are matched dollar for dollar, doubling our impact. This translates into double the support for our local communities—more meals for the hungry, temporary housing, job training, literacy programs, emergency response services, victim safety, medical assistance, education support, and much more.

Nelnet, along with Nelnet Bank, is committed to the Community Reinvestment Act and ensuring the needs of the communities where we operate are being addressed. We know that our businesses succeed when our communities are vibrant, so we must do our part to make a positive impact. Some ways we have done this include sponsorship of innovation summits and large real estate revitalization projects, like Lincoln's Telegraph District.

Finally, through Nelnet Renewable Energy, we support the global transition to clean energy by investing in renewable energy projects that create jobs, generate cost savings for energy consumers, and strengthen community resiliency.



Investing in our communities isn't limited to volunteering and donating. We also make it a priority to support local innovation, new ventures, renewable energy, and real estate developments.

Q: *I just recently joined Nelnet and am about to make a donation to my child's school. Can I get the match?*

A: *Yes, if you've been with us for at least six months. When you give more than \$100 to eligible educational institutions devoted to K-12 or higher education, Nelnet will provide a 3:1 match for each donation up to \$25,000 annually per associate. This means that your child's school will receive four times the amount your donation would have given it alone.*

“ In every community, there is work to be done. In every nation, there are wounds to heal. In every heart, there is power to do it.

- Marianne Williamson
American author, spiritual leader, and political activist



Embrace Ways to Conduct Business that Positively Impact Society

At Nelnet, we do business the right way—from doing right by our customers, to doing right by our associates, to doing the right thing within the communities we serve. Nelnet takes its broader impact on society and our world very seriously. To meet these responsibilities, we focus on:

Governance—Good companies don't happen by chance.

They are founded with purpose, led with integrity, governed with balance, and focused on long-term value creation. At Nelnet, we live to serve others and make dreams possible. Achieving that goal requires a fair, independent governance framework that reflects our diversity, recognizes our challenges, and respects all our stakeholders.

Planet—Our shared responsibility.

In a world of differences, one thing unites us all: our planet. For something that plays such an enormous role in our lives, it's often taken for granted. At Nelnet, we're taking real steps to ensure the responsible use of its resources and build a more sustainable future. We commit to leaving the world a better place for future generations. Environmental responsibility is both a moral obligation and a sound business practice. Our commitment extends beyond compliance—we actively seek ways to reduce our environmental footprint and contribute positively to the communities and natural environments around us.

We believe that small, consistent actions—recycling programs, paperless statements, smart energy use—can have a big collective impact. Outside of our walls, investments in community redevelopment and renewable energy give us opportunities to make a meaningful green impact in the communities we serve.

People—We believe in serving those who serve others.

Associates are the lifeblood of Nelnet. They're the ones who transform service from an idea into an experience. It's vital that our people are supported—personally, professionally, financially, and physically. Nelnet must positively impact their lives just as they positively impact the lives of our customers.

Prosperity—We're a service company in the people business.

Nelnet was founded with one purpose: to serve. But why do we serve? The answer is simple: to power people's potential and enrich their lives. At Nelnet, we have the responsibility and ability to make the world a better, more prosperous place where everyone has the opportunity to fulfill their dreams.

Together, these areas of focus guide us in establishing the purpose and principles that unify Nelnet, taking care of the planet we all inhabit, giving our associates the opportunity to grow and succeed, and supporting the growth of our communities and businesses. In doing so, we also reduce our exposure to risks and improve society in ways that can help all of us now and into the future.

Nelnet is committed to sustaining our planet and conducting business in a socially responsible manner.

“We bring together what is good for business with what is good for the world.”

- Indra Nooyi
Former CEO of PepsiCo

