

# Reshaping Internal Audit

→ Advantage through Data,  
Technology and AI

**Rycharde Guedes**  
Audit Senior Specialist

# Agenda



**Context about Nu**



**AI in Action Plan**



**Audit Risk Landscape**



**Q&A**

# Context about Nu

# Context about Nu

## Facts

- Nubank's culture actively encourages innovation and controlled testing.
- We can hire "non-auditors" like engineers.
- Governance can be perceived as bureaucracy if not implemented with agility.
- We operate in a highly regulated environment requiring rigor and precision.

## Conclusions

- We have the ideal environment to go beyond traditional audit and create something unique.
- There is an expectation that our team will "Nubank-ize" the Internal Audit function.
- We can fully digitize the internal audit function.
- We have unconditional support from executive leadership to experiment (80/20 rule).

The Internal Audit function must evolve from being merely **reactive** (finding faults and risks after they have occurred) to being **proactive and strategic**.

The future  
is now

and purple.



Dobby,  
the Co Auditor

# Artificial Intelligence

## To gain **efficiency**



### Established:

- Automated issue drafter
- Audit report consistency checks
- Report drafting checklist
- Action plan validator
- Automatic work paper formalization

### In construction:

- AI-driven Fieldworks
- Continuous audit closed loop

## To gain **intelligence**



- Regulatory Search:  
Instant Analysis of Normative Changes
- Massive Document Reading  
Processing Thousands of Pages in Minutes
- Construction of Complex Programming Codes:  
Generation of Analysis Scripts
- Test of Design Execution:  
Automated Control Evaluation

# Action Plan Submission



## Action Plan Implementation Validator

PT

Valide a implementação de Action Plans através de análise manual ou automática com dados de auditoria.

### Configuração da Validação

#### Modo de Entrada de Dados

Manual  Manual

[Validar Implementação](#)

#### Dados do Issue

Título do Issue \*

Título do issue identificado na auditoria

Descrição do Issue \*

Descrição detalhada do problema identificado

Nível de Risco

Low

#### Progress

0%

**!** Preencha todos os campos obrigatórios:

- Título do Issue
- Descrição do Issue
- Título do Action Plan
- Descrição do Action Plan
- Evidências (texto ou arquivos)

#### Configuração

Modo: Manual

Risco: low

Evidências:  Obrigatório

# The Action Plan Ping Pong





## Dobby, the coauditor

### Submit evidence

Tell us what was implemented and attach at least one proof. We'll check your evidence against the action plan's acceptance criteria.

- 1 Select action plan 2 **Submit evidence** 3 Validation results

AP 3.1 ON TRACK - 22 DAYS LEFT

[View full details](#)

#### Migration of

Owner: Mar Due: 28 Jun

##### DEFINITION OF DONE

- Describe the monthly control implemented  
Owner, frequency, what gets checked
- Show evidence of execution for at least 1 cycle  
Logs, screenshots, exported deck
- Link to the documented procedure  
Confluence, Jira ticket, or process doc
- Confirm the issue does not reoccur  
Reconciliation showing all RAS metrics present

##### What was implemented?

Walk us through the control. What gets checked, by whom, how often, and what changed since the issue was raised.

##### Supporting links

Paste a Confluence, Jira or Google Docs URL

[Add](#)

##### Files

[Add screenshots, PDFs or logs](#)

Your progress 1 of 3

- Action plan selected  
AP 3.1 - Migration of
- Describe what was implemented  
At least a short paragraph
- Add one link or file as proof  
Confluence page, screenshot, PDF...

[Complete the steps to submit](#)

[Save as draft](#)



## Dobby, the coauditor

### Validation results

Your evidence on the left, the model's reasoning on the right. Camila Cordoba will review both.

■ Select action plan      ■ Submit evidence      3 Validation results

**Needs more evidence**  
0 of 4 criteria covered

[Download PDF report](#)

[Fix gaps & resubmit](#)

CRITERION 1

#### Describe the monthly control implemented

Owner, frequency, what gets checked

"Implementation done." — from your text evidence

**NOT COVERED**

#### Process documentation is missing

A formal policy or official communication designating OMNI as the source of truth for Market and Liquidity Risk metrics reported to the Risk Committee.

CRITERION 2

#### Show evidence of execution for at least 1 cycle

Logs, screenshots, exported deck

"Implementation done." — from your text evidence

**NOT COVERED**

#### Source data — 4 monthly cycles is missing

A copy of the source notebook or original data file used to calculate the metrics for each of the four months.

CRITERION 3

#### Link to the documented procedure

Confluence, Jira ticket, or process doc

"Implementation done." — from your text evidence

**PARTIALLY COVERED**

#### Committee minutes is missing

Risk Committee minutes (or excerpts) where these specific metrics are presented.

CRITERION 4

#### Confirm the issue does not reoccur

Reconciliation showing all RAS metrics present

"Implementation done." — from your text evidence

**PARTIALLY COVERED**

#### Reconciliation is missing

A side-by-side reconciliation showing OMNI values match the values presented in committee minutes.



Dobby, the coauditor

## Validation results

■ Select action plan      ■ Submit evidence      **3** Validation results



**PRE-APPROVED** AI confidence 94% - all criteria covered

### Your evidence is on its way to Sa

The AI pre-review found that all 4 acceptance criteria are covered by what you submitted. Sa (Internal Audit - ZLoD) will do the final review within 5 business days.

[Download PDF report](#)

[View my submission](#)

[Back to action plans](#)

#### WHAT HAPPENS NEXT

- 1** **AI pre-review**  
Evidence reviewer - Just now
- 2** **Auditor review** **IN PROGRESS**  
Sabrina Alves - Within 5 business days
- 3** **Manager approval**  
Be - Internal Audit Manager - After auditor sign-off
- 4** **Action plan closed**

#### HOW THE AI MAPPED YOUR EVIDENCE

4 of 4 acceptance criteria covered

- Describe the monthly control implemented**  
Matched to: Confluence page - text description
- Show evidence of execution for at least 1 cycle**  
Matched to: Slack screenshot (Apr 5) + notebook output
- Link to the documented procedure**  
Matched to: confluence.nubank.com/risk/ras-monthly
- Confirm the issue does not reoccur**  
Matched to: Reconciliation across Mar-Jun 2026

#### FULL ANALYSIS

The evidence includes a process description (Confluence), a real-world output of the monitoring control (Slack screenshot), and a description of the remediation steps. This confirms the control is designed and operating effectively.

Pre-approval is an AI assisted check, not a final decision. Internal Audit + Manager sign-off are still required.

Informational content only. Does not disclose specific internal controls, proprietary processes, or regulatory obligations.



## Dobby, the coauditor

### Action Plan 1.1 — Monthly control implementation

From Ana · May 6, 2026 · 14:22

**AI RECOMMENDS APPROVAL** 93% confidence · all 4 criteria covered  
All four acceptance criteria are covered by the submitted evidence. The monthly control is documented in Confluence (page 14224), executed for 4 cycles (Mar–Jun 2026) with screenshots and source notebooks attached, presented in committee minutes, and reconciled. No recurrence of the original issue.

ISSUE	ACTION PLAN	OPERATIONAL OWNER	DEADLINE
<b>FINDINGS-478</b> Issue #1 — Failures in the	<b>FINDINGS-483P</b> Action Plan 1.1 — Monthly control implementation	<b>Ana</b> Risk: L/D	<b>May 30, 2026</b> 22 days from submission

Confirm your assessment for each of the 4 acceptance criteria. Once all are reviewed, you can approve or send back. 0/4 reviewed

<b>CRITERION 1</b> <b>Describe the monthly control implemented</b> Dates, frequency, what gets checked Evidence: Confluence link + text	<b>AI SAYS: COVERED</b> Confluence page documents owner, frequency (monthly, 5th BD), and control steps.	<input type="checkbox"/> Agree with AI <input type="checkbox"/> Disagree
<b>CRITERION 2</b> <b>Show evidence of execution for at least 1 cycle</b> Logs, screenshots, exported deck Evidence: PDF (4 months screenshots) + notebook	<b>AI SAYS: COVERED</b> Screenshots cover Mar–Jun. Notebook execution timestamps match.	<input type="checkbox"/> Agree with AI <input type="checkbox"/> Disagree
<b>CRITERION 3</b> <b>Link to the documented procedure</b> Confluence, jira ticket, or process doc Evidence: Confluence + Jira RBK-2204	<b>AI SAYS: COVERED</b> Confluence link present. Jira RBK-2204 references the procedure page.	<input type="checkbox"/> Agree with AI <input type="checkbox"/> Disagree
<b>CRITERION 4</b> <b>Confirm the issue does not recur</b> Reconciliation showing all RAG metrics present Evidence: reconciliation.xlsx	<b>AI SAYS: COVERED</b> Reconciliation file shows 100% match across the 4-month window.	<input type="checkbox"/> Agree with AI <input type="checkbox"/> Disagree

FINAL NOTE (OPTIONAL)

Add any context for the manager review (optional)...

# Audit Risk Landscape

# Fieldworks per year

2017	2018	2019	2020	2021
One team member ~10 Fieldworks	~2 people ~10 Fieldworks	~10 people ~15 Fieldworks	~20 people ~15 Fieldworks	~25 people ~25 Fieldworks
2022	2023	2024	2025	2026
~40 people ~36 Fieldworks	~45 people ~40 Fieldworks	~50 people ~60 Fieldworks	~60 people ~75 Fieldworks	~60 people 100+ Fieldworks

Informational content only. Does not disclose specific internal controls, proprietary processes, or regulatory obligations.

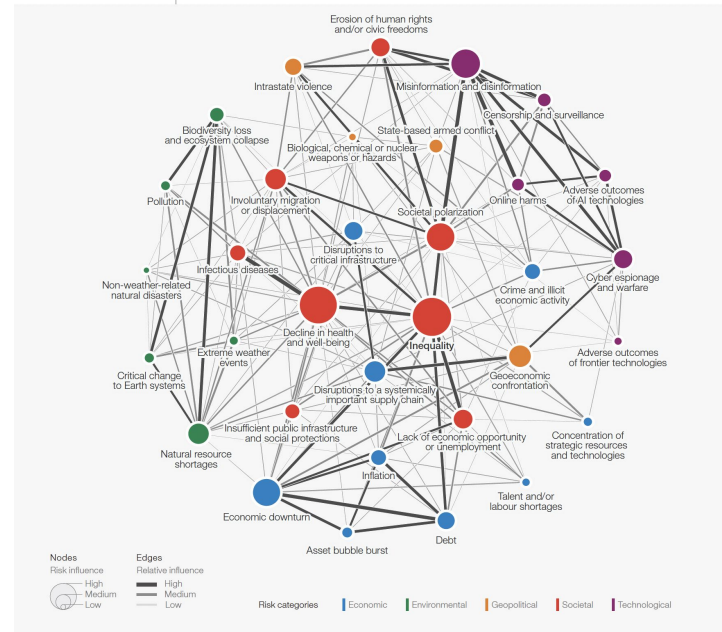
Connecting the dots is done manually by Audit Leadership before each Audit Committee cycle. Systemic patterns and root causes remain invisible to leadership. The process is non-scalable and dependent on individual institutional memory.

# Audit Risk Landscape

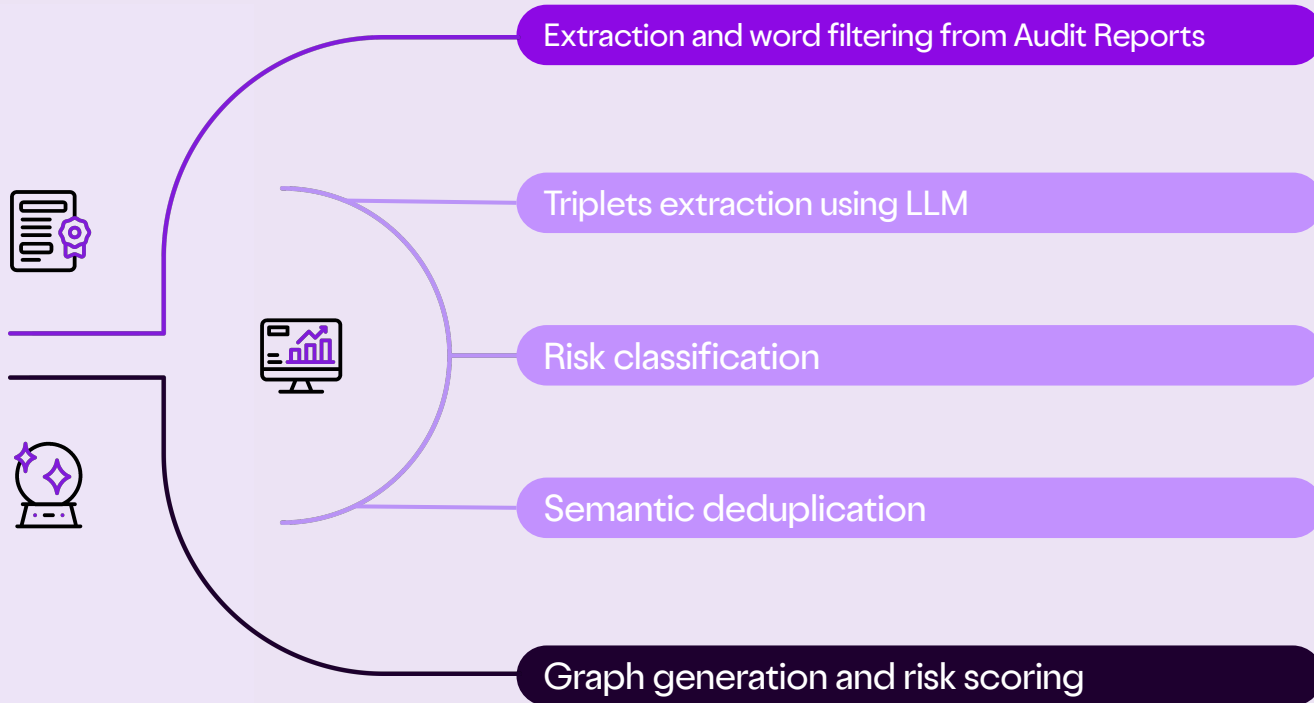
## The Inspiration

This is an interconnections map that the World Economic Forum publishes annually to illustrate how different global risks (economic, environmental, geopolitical, societal, and technological) **influence** each other.

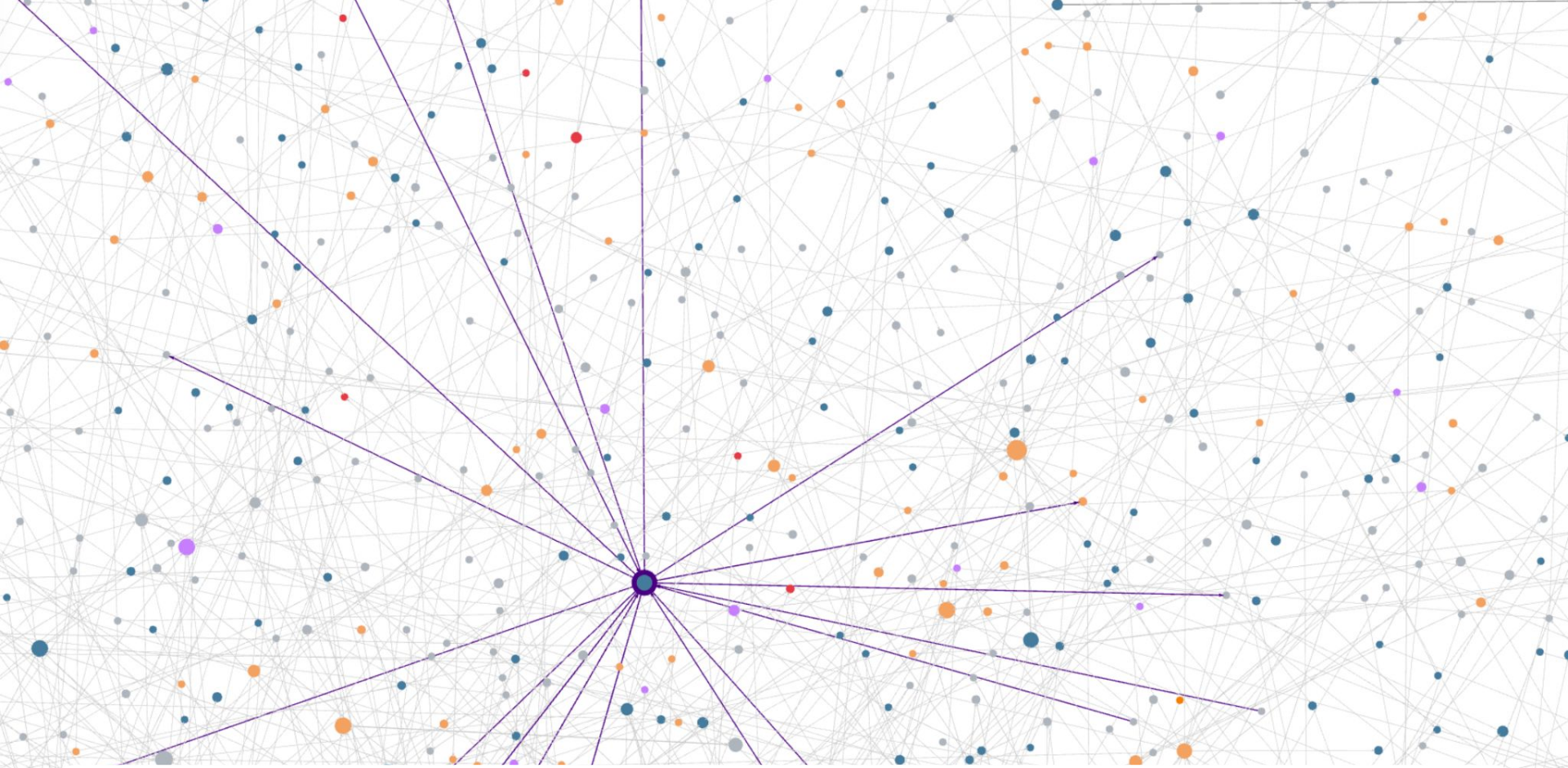
FIGURE D Global risks landscape: An interconnections map<sup>9</sup>



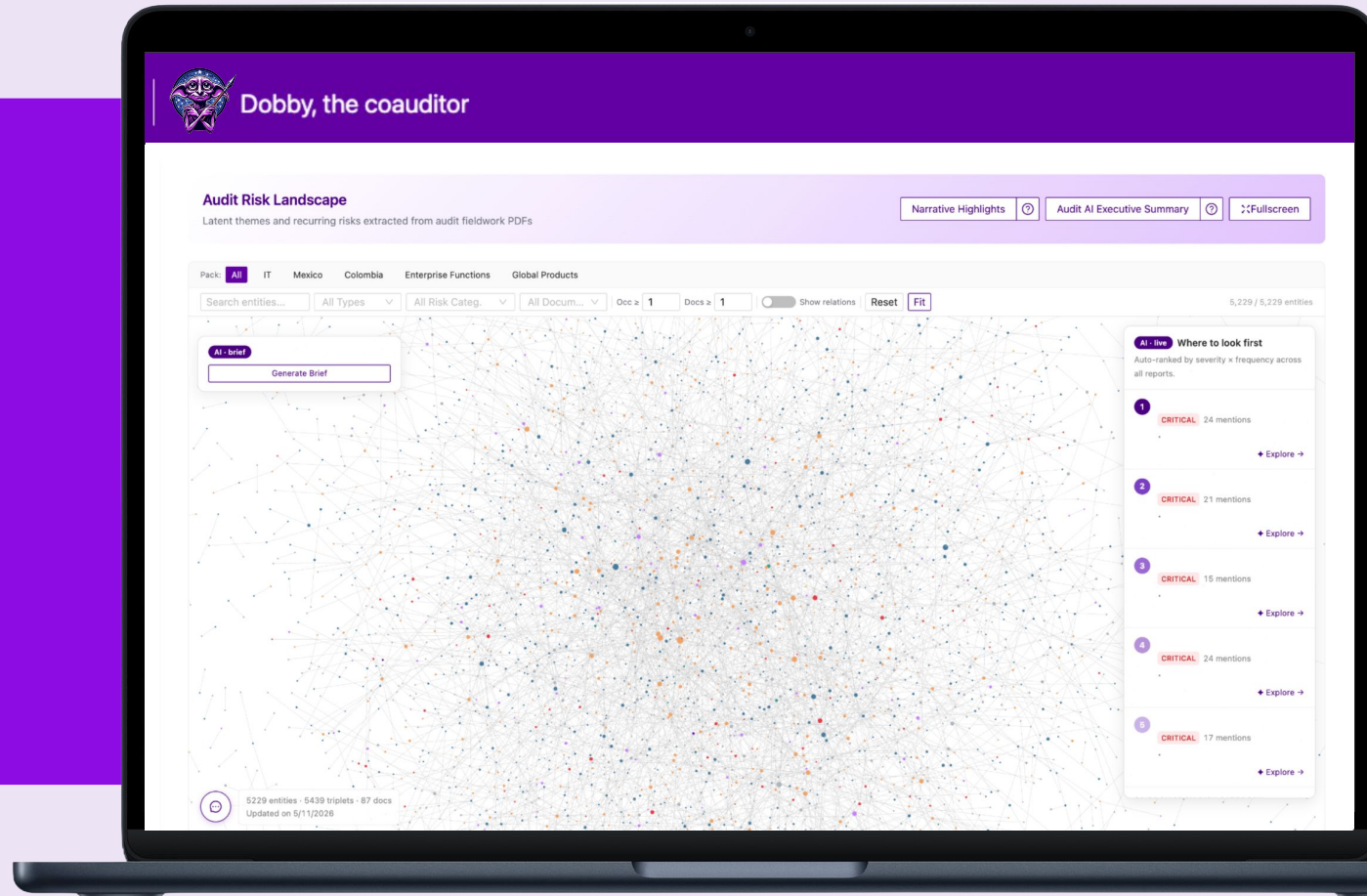
# Let's Nubakarize it!



❑ Informational content only. Does not disclose specific internal controls, proprietary processes, or regulatory obligations.



**However, this is really difficult to read**



Informational content only. Does not disclose specific internal controls, proprietary processes, or regulatory obligations.

# Q&A