

# NOVABASE

## Human Rights Policy

# NOVABASE

This policy reflects Novabase Group commitment to internationally recognized human rights principles, including those expressed in the 10 Principles of the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, the Portuguese Charter for Diversity, the Charter of Fundamental Rights of the European Union and the UK Modern Slavery Act 2015. It applies to all Novabase employees, partners, suppliers and other stakeholders and it is aligned with the company's values and legal standards wherever Novabase operates.

**Equality and Non-Discrimination:** Novabase is committed to create a work environment free from discrimination. This includes, but is not limited to, discrimination based on race, gender, sexual orientation, gender identity, religion, national origin, age, disability or socioeconomic status. Hiring practices, remuneration, access to training, promotion and termination will be equal and based on merit and competence

**Right to Privacy and Data Protection:** Novabase respects the privacy of all its employees, customers, partners and other stakeholders. Personal information is collected, processed, stored and disposed of in accordance with applicable privacy and data protection laws in all locations where Novabase operates. To this end, the company remains committed to ISO/IEC 27001 and ISO/IEC 27701 certification.

**Freedom of Expression and Association:** The company respects workers' right to freedom of expression and association.

**Safe and Healthy Work Environment:** Novabase will provide a safe and healthy work environment in compliance with local and international health and safety standards. To this end, Novabase remains committed to ISO 45001 certification.

**Working Conditions:** Novabase will ensure that all employment practices, including remuneration, working hours and benefits, comply with local and international laws where the company operates. Novabase has adopted a strict policy against bribery, corruption and human rights abuses. Novabase strongly rejects all forms of modern slavery, including forced labor, human trafficking and exploitation, and does not tolerate them in contemporary companies and supply chains. We are committed to our stakeholders to take all necessary actions to eliminate modern slavery from our operations and supply chains. Our dedication to eradicating modern slavery reflects our core values and our commitment to safeguarding the human dignity of all individuals associated with our company.

# NOVABASE

**Corporate Social Responsibility and Community Responsibility:** Novabase will strive to adopt sustainable and ethically responsible business practices in all its operations. The company is committed to being a positive force in the communities where it operates, including efforts to promote technology and IT education, including through volunteer initiatives.

**Implementation and Enforcement:** The company has a Social Impact Committee to monitor the implementation of this policy and address any human rights issues or concerns.

Violations of this Policy may lead to disciplinary action, including possible contract termination, and may involve additional legal consequences, such as potential liability for damages. This policy is a living document and will be reviewed regularly or as necessary to reflect best practices and incorporate applicable legal changes. Compliance with this policy is fundamental to maintaining the integrity and reputation of Novabase, as well as the trust of its customers and partners. All its Stakeholders are responsible for complying with this policy, reporting any violations of the policy and cooperating in maintaining a safe and respectful environment at Novabase.