

NOVABASE

Code of Conduct

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1. Background

Our Code of Conduct describes the behaviours, principles and values that we all must exhibit while doing our jobs, such as acting with integrity, using ethical and proper behaviour, making informed decisions and complying with legal and regulatory obligations.

Our values are:

- **I give it** my all, my utmost, the best of me. For the customer, for everyone, for my co-workers, partners and customers' customers. Giving is the first step in being simpler and happier.
- **I listen**, and I am ready to learn. To listen, see, let others speak, recognize, cooperate, experiment, be quick to err, do things differently, ask for help. To have the humility of wanting to know more, and the pride of always wanting to grow.
- **I connect** to talent and happiness, both my own and those of others. I connect alongside people, and I connect every side of myself, both personally and professionally. Many people can together create an unstoppable chain of talent, empathy and energy. I connect, praise, applaud, celebrate and encourage. I want to be part of this chain.
- **I grow** and, when I do so, I make things grow. I want to leap towards the challenge, show and discover who I am, have fun as a team and learn how to better grow. I am a creator: I make life simpler and happier for people. And what remains, when I'm done, is what I am.

Our Code of Conduct is for everyone who works with or for Novabase or the Group's companies, namely our employees, subcontractors, suppliers and partners.

2. Professional Conduct at Novabase

2.1 Novabase Group Professionals and those of our Customers

As Novabase employees, we know what is expected of us, and always try to go beyond expectations.

We determine the direction to be taken and assume its associated responsibilities, earning autonomy and the trust of all those who cross paths with us.

Our success is rooted in our creativity and rigour, our sense of teamwork and willingness to help each other, our enthusiasm and - above all - our experience and knowledge.

At Novabase, we value initiative and tolerate mistakes, always seeking to learn from them, and try to innovate responsibly. We conduct our business in accordance with the company's goals and interests and are committed to preserving what we have worked so hard to build: our name, credibility and heritage. We are proud of the reputation we have made for ourselves.

At Novabase, our main goal is to deliver value. To do so, we give everything we are and everything we have. We work with promptness, dedication and enthusiasm. Through our experience and knowledge, we seek to address our customers' requests, adapting ourselves to their circumstances, but without losing our own identity.

We put forward what we believe is apposite and what we know we can deliver, always trying to do more and better. We seek the satisfaction of our customers.

2.1.1 Our Commitment

- Achieving the company's goals;
- Safeguarding the company's interests;
- Complying with policies and other internal requirements;
- Ensuring the proper use of our resources;
- Refraining from speaking on the company's behalf without due prior authorization;
- Using social networks responsibly;

- Reporting privacy incidents or vulnerabilities that may compromise the security of our information;
- Cooperating with internal auditing areas;
- Seeking continuous improvement.

2.1.2 How We Use Information

We follow our internal policies which define the company's commitment to information security and personal data protection, as well as compliance with legal and regulatory requirements. We do not share any internal information with third parties without due prior authorization. We act in good faith and respect our customers' privacy. We use their information exclusively for authorized purposes, and do not disclose any information to which we have access.

Information is one of our company's most important value-added assets. We ensure its confidentiality, privacy and integrity by preserving confidential information and following rules in place for document classification.

2.1.3 How We Classify Documents

Documents are classified according to their nature to ensure their proper protection during handling. Document classification is the responsibility of those who prepare and maintain them. We ensure that our information is properly classified and periodically reviewed and respect the classification of documents shared by our customers.

2.1.4 Intellectual Property Rights

We help to resolve the most demanding challenges. To do so, we use our own software engineering solutions as well as third-party technologies. Our success is primarily founded on our technology expertise and constant search for innovation; as such, our intellectual property is an asset of tremendous value to the company.

We have agreements in place with our partners, customers and suppliers to protect our ideas, products and technology development. However, all of those who work with and for Novabase are responsible for properly safeguarding our intellectual property rights.

We are also committed to respecting the intellectual property rights of third parties.

3. Ethical Conduct at Novabase

3.1 We Have Integrity

Novabase is aware of, and acts according to, the principles and values of domestic and international legislation on human and social rights.

We foster a culture of responsibility, respect and loyalty. We are upstanding, and respect what others have built, and what belongs to them. We do not take what is not ours, and are open to cooperation, acting with rigour and loyalty.

We follow the law, regardless of the location where we are working, supported by specialized entities.

We disregard ambiguous stances, we are upstanding, we do not get entangled in conflicts of interest, we neither accept nor offer any kind of bribery, we do not give or receive presents, entertainment or hospitality which, in key regions, are not permitted by law, are socially unacceptable or seek to improperly influence the decision-making of Novabase or third parties.

Novabase employees should refuse any third-party gifts whose economic value exceeds reasonable limits under social custom.

We have adopted a system for reporting irregularities (known as “SPI”) that may occur within the Group. According to the implemented system, employees and other

Novabase stakeholders have access to a direct and confidential Whistleblowing Channel for reporting any improper practice (as defined therein), including the prevention of money laundering and terrorist financing and the prevention of corruption and related offences, having occurred within the Novabase Group, regardless of any blame that may be attributed, and which may impact the financial statements or the information sent to the Portuguese Securities Market Commission (CMVM), or that may cause serious damage to Novabase or its stakeholders (employees, customers, partners and shareholders).

At Novabase we adopt a proactive stance of rejecting all forms of corruption in the various sectors in which we operate. To achieve this goal, we have an Anti-Corruption Policy, which plays a key role in preventing behaviour that may violate the law or Novabase's principles of conduct, either directly or through third parties.

Novabase respects the private lives of its employees, and there is no interference in their activities or behaviour outside the relationship with Novabase, as long as they preserve Novabase's image and legitimate interests. Novabase will not tolerate situations that may involve personal benefits from opportunities related to Novabase and its image or activity, and must refrain from using confidential information for personal benefit or for the benefit of third parties and comply with internal rules to avoid conflicts of interest in various areas.

3.2 We are Conscientious

We are conscientious and concerned about all of our stakeholders, which is why we have implemented an Integrated and Certified Quality, Environmental, Occupational Health and Safety Management System, and are governed by an IMS Policy aligned with Novabase's vision and values and the needs of stakeholders.

3.2.1 We Deliver with Quality

We implement and improve our processes and systems in an ongoing, dynamic manner, with consistency and organizational integrity in line with stakeholder expectations.

We foster an attitude and culture of constant rigour, professionalism and innovation geared towards action, results and accountability. We foster professional development, skill-building and teamwork, managing our customers' requirements and expectations, and adding value to their strategic goals to achieve high levels of satisfaction.

3.2.2 We Protect and Promote the Environment

We contribute towards a sustainable environment by preventing pollution and encouraging the sustainable use of resources. We control our sustainability metrics and act according to their results by implementing initiatives for continuous improvement.

3.2.3 We Safeguard Occupational Health and Safety

We ensure a safe and healthy workplace, preventing work-related injuries and illnesses and always seeking constant improvement. Our goal is to eliminate hazards and minimize risks in occupational health and safety through effective prevention and protection measures, together with training and keeping our employees and service providers properly informed.

3.3 We Respect Rights and Equality

3.3.1 We Reject Harassment and Intimidation

At Novabase, we are informed, and know the meaning of harassment:

- It is a process, not a phenomenon or isolated fact;
- It always entails a chain of actions and conduct which repeat themselves;
- It is undesirable behaviour, perceived as abusive, of a psychological or physical nature;
- Its goal is to hurt dignity or create an intimidating, humiliating or destabilizing atmosphere;
- It is taking advantage of the victim's vulnerability.

We also know what harassment is not:

- Sporadic conflicts;
- Decisions resulting from the organization of work, when consistent with the employment agreement;
- The exercising of hierarchical and disciplinary power;
- Occasional pressure;
- Occasional praise;
- Mutual romantic feelings which are not undesirable or rejected.

We have created a procedure to investigate potential cases of harassment, while always safeguarding the identity of all involved (whistle blower, victim, witness or perpetrator).

3.3.2 We Promote Gender Equality, Diversity and Inclusion

At Novabase, we have created a Gender Equality and Diversity Plan, since we believe that differences tend to enhance the quality of decision-making processes through multiple perspectives, greater intellectual and cultural richness and a better representation of reality and of those involved.

As such, at Novabase, we promote:

- Equal opportunities and mutual respect regardless of ethnicity, gender, religion, beliefs, social background or sexual orientation;
- The dignity, integrity and right to equality and diversity of our employees;
- Equality and inclusion in access to employment;
- The growth of everyone;
- Access to training and skill-building;
- Advancement;
- Bold, constant feedback;
- A culture of merit and recognition;
- Reconciliation of professional, personal and family life;
- The respect, freedom and room to be exceptional in any gender.

4. Data Protection and Information Security

4.1 We are Aware of the Rights of Data Subjects

Novabase ensures:

- **Right to information:** data subjects may request information on their personal data and the type of processing the data undergoes;
- **Right of access:** data subjects can find out whether their data is being processed by Novabase or not, namely the purpose of processing, the categories of personal data in question, the recipients or categories of recipients to whom data are being, have been or will be disclosed, and the time period for retaining data or, if not available, the criteria for determining this period;
- **Right to rectification:** data subjects can correct erroneous information, complete missing information and know that disclosure will be done to lawful recipients;
- **Right to be forgotten:** data subjects can request that personal data be deleted when no longer needed for the original purpose of their collection or processing;
- **Right to restriction of processing:** when data cannot be deleted, data subjects can request restricted processing of their personal data;
- **Right to portability:** data subjects have the right to obtain their personal data and convey them to others;
- **Right to object:** data subjects can object to the processing of their personal data at any time;
- **Right not to be subject to solely automated decisions:** data subjects shall have the right not to be subject to a decision based solely on automated processing of their personal data.

4.2 We Strive to Protect Our Information and the Information of Our Customers, Partners and Suppliers

Whether as a data controller or subcontractor, Novabase recognizes the importance of properly protecting our information and the information of our customers, partners and suppliers, including personal data, over their life cycle.

We ensure that all information is processed in accordance with applicable regulatory and contractual obligations, including compliance with the requirements of the General Data Protection Regulation (GDPR).

To achieve this goal, we undertake to:

- Assume a commitment with the GDPR;
- Comply with regulatory, legal and contractual privacy requirements;
- Integrate privacy requirements into our business processes;
- Ensure the protection of personal data;
- Create a culture of privacy consistent with the company's size and importance.

4.3 We Care about the Security of Our Information

Regardless of their specific jobs, our employees are responsible for the information they process and convey. As a result, we foster information security and ensure that information is not disclosed for unauthorized purposes. Along these lines, we are committed to:

- Complying with the Information Security Policy and other relevant regulations;
- Informing our partners, service providers and other entities with regard to their responsibilities and obligations in the area of privacy and information security;
- Reporting any security incidents in a prompt manner, using the mechanisms available for this purpose;
- Refraining from disclosing authentication information;
- Refraining from disclosing sensitive information to third parties, without express authorization, by any means of communication.

5. Whistleblowing Channel

In order to facilitate compliance with this Code, Novabase has a Whistleblowing Channel, through which it is possible to report possible irregularities that may constitute offences.

Complaints will be managed through a rigorous, transparent and objective procedure, safeguarding in any case the confidentiality of the people concerned and involved in the facts and behaviour being reported.

We will not tolerate any reprisals against anyone who, in good faith, reports facts or situations that could be considered conduct prohibited by this Code. In this context, Novabase works continuously to improve and align all communication channels in accordance with the best market practices at any given time.

Information on the Whistleblowing Channel is available to all employees via the Novabase intranet and to anyone interested via the corporate website.

6. OFFENCES AND SANCTIONS

Any violations of the principles or provisions of this Code may constitute the commission of one or more of the offences set out in Annex I to the Plan for the Prevention of Corruption Risks and Related Offences, and consequently the sanctions set out therein may be applied, as well as disciplinary measures, as set out in the Labour Code, defined in each situation, after the necessary investigations and gathering of probative evidence, and may even lead to dismissal with just cause.