

NOVABASE

ESG Policy

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At Novabase, we are dedicated to leveraging our business model towards a more sustainable world. Our commitment extends to ensuring our long-term sustainable growth while considering the interests of our talent, clients, shareholders, and all stakeholders involved. This holistic approach encapsulates our goal of reduction of the impact of climate change, promoting equal opportunities and fostering mutual respect, keeping the highest ethical principles.

Purpose

Our ESG Policy serves as our roadmap for effectively integrating our priorities within our strategic planning, decision-making, development of offerings, and interactions with all our stakeholders. Our goal is to adhere to relevant laws and embrace both local and global ESG best practices.

Scope

This Policy applies to all Individuals, Partners, Suppliers, and any other stakeholder who performs services for, or on behalf of, Group Novabase and its subsidiaries.

Each stakeholder is responsible for adhering to this policy and reporting any violations or ethical concerns related to sustainable issues.

Principles

In addressing Sustainability matters, our approach at Novabase Group is twofold: inside-out and outside-in. The inside-out perspective focuses on how our internal operations and values impact the external environment and society. This involves actively reducing our environmental footprint, fostering a diverse and inclusive workplace, and upholding high ethical standards and governance. On the outside-in perspective, we focus on how external ESG trends and stakeholder expectations shape our strategies and operations. We actively engage with our community, clients, and shareholders to understand their concerns and expectations regarding sustainability, social responsibility, and governance, integrating these insights into our business model. This dual approach ensures a comprehensive and responsive ESG strategy that is both proactive and reactive to the evolving world around us.

To achieve objectives and keep our business strategy, our policy outlines nine key steps that guarantee the fulfilment of our priorities focused on the three main pillars: Environment, Social and Governance. All our stakeholders are responsible for following the policy with the support, direction, and commitment of our leadership.

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Environment

While Novabase does not have a significant carbon footprint nor is it directly exposed to physical climate change risk as a technology company, we recognize the significant role we play in shaping a sustainable future. In this rapidly evolving digital age, it is our responsibility to innovate responsibly, ensuring that our technological advancements contribute positively to the environment. To foster awareness and understanding we pursue to actively communicate our environmental policy to all stakeholders, seeking their support in its implementation and continued improvement.

In the Environmental pillar we focus our efforts in three main areas which are the center of our considerations to assess our environmental risks and exposure in our business processes.

- 1. Take actions to reduce our carbon footprint and transitioning into a net zero business**
 - Reduce the consumption of fossil-fuel energy;
 - Continue to increase our fleet with plug-in hybrid and electric vehicles;
 - Continue to use our Nearshore Agile Delivery Model whenever possible as it proved to fit on the new market needs.

- 2. Embrace circular economy principles through the promotion of recycling and resource reduction and efficiency**
 - Create awareness on decreasing the use of paper;
 - Reduce the use of disposable water bottles by incentivize the use of glass cups and bottles;
 - Replace all fluorescent lightling with LED lighting;
 - Decrease water flow and installations of regulating valves in faucets;
 - Reduce the amount of waste;
 - Operate with a Centralized Management System to control the operating times of the climate control system;
 - Increase the implementation of environmental education and training programs at Novabase.

- 3. Drive the shift towards a low-carbon and circular economy by assisting our clients in fulfilling their environmental commitments**
 - Novabase works daily together with its clients to help them transitioning into a low-carbon and more digital business.

Among our commitments and some already implemented measures, we highlight that Novabase has an Environmental Management System in place (ISO 14001) and in quality (ISO 9001), which are annually reviewed.

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Social

Our talent pool is a key component of our business model. Managing diversity, equality and inclusion is essential for all our businesses. We promote a culture where all people have a proactive “voice” within the organization and focus on transparent communication in our processes and procedures, promoting equal opportunities in an organization which is increasingly more multigenerational and multi-cultural.

At Novabase, we believe in equal opportunities and mutual respect regardless of everyone's ethnicity, gender, religion, beliefs, social background or sexual orientation. These differences which characterize us, and a variety of perspectives, tend to enhance the quality of decision-making processes, providing greater intellectual and cultural richness and a more accurate reflection of reality and of those involved. This commitment applies to all companies belonging to the group, and to all regions.

1. Continuously prioritize our talent by providing an unparalleled experience that nurtures their growth and cultivates the skills of the future

- Accelerate the professional and personal development of our employees by seamlessly combining growth opportunities derived from work challenges with community-based learning and structured training;
- Raise awareness on our current leaders from underrepresented genders, as an inspiration for future leaders.

2. Foster a work environment that embraces diversity, inclusivity and the flexibility of a hybrid work model

- Ensure and monitor implementation of gender equality, diversity and inclusion measures;
- Develop high potential talent at the organization, aiming to enhance gender balance in the various career levels;
- Give support and visibility to corporate initiatives for inclusion (gender equality, diversity, non-discrimination and others);
- Uphold a working environment in which everyone feels they are treated with respect, courtesy, consideration, and professionalism;
- Maintain a hybrid working model that provides a dual benefit of flexibility and inclusivity.

3. Actively contribute to digital inclusion within our communities, ensuring everyone has equal access and opportunities

- Commit to promote equal education and to foster mutual respect, irrespective of factors like ethnicity, gender, religion, beliefs, social background, or sexual orientation;

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- Facilitate and make available more information in Novabase's internal platform on family support topics, namely on family health insurance, well-being and newborn children policy;
- Develop volunteer programs to allow everyone to take individual action;
- Implement the "Second Life" program for equipment at the end of its professional life, allowing Novabase Group employees to use this equipment at home;
- Share and disseminate mentoring programs.

Novabase has already implemented several measures aimed at well-being and a balance between the professional and personal lives of its employees. The values of diversity, equality and inclusion are a prerequisite for the sustainability of Novabase's long-term business strategy. As such, Novabase is committed to constantly encouraging and promoting equality between our people and accepting each person's individuality as a competitive advantage.

This commitment is also reflected in our Code of Conduct, in the Gender Equality and Diversity Plan, in the Measures for identifying and acting in cases of Moral Harassment and in the Hybrid Work Policy.

Governance

In carrying out its duties and exercising its powers, the conduct of Novabase and its management, legal representatives and employees is bound to strict compliance with the law and high ethical principles.

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 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.

1. Always maintain the highest ethical principles across our supply chain

- In the pursuit of our duties and in their exercise, Novabase, its management, legal representatives, and employees are bound by strict compliance with the law and the highest ethical principles all time and in all geographies where we operate;
- Our ethical concerns also extend to our suppliers and partners. The principles and rules described in the Novabase Code of Conduct must be strictly followed by any partner or supplier working with Novabase, and incorporated into their day-to-day routines;

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- Novabase expects its Partners and Suppliers to conduct and develop their business and instruct its People to comply with the principles set out in Novabase Corruption Prevention Policy for Suppliers;
- 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.

2. Promote diversity, inclusion and responsible governance

- At Novabase, we believe in equal opportunities and mutual respect, and these principles are also applied to our statutory bodies and stakeholders;
- We do not favour or disfavour any employees according to their ancestry, gender, race, language, political, ideological or religious beliefs, economic status, or social standing;
- With regard to qualifications and education, in addition to areas associated with technology, various other areas of knowledge must also be represented, in view of the mounting importance of multidisciplinary in team performance.

3. Keep data, identity, and organization secure

- As an IT value driven player, Novabase actively works to protect data and promote cybersecurity values;
- Novabase is committed to mitigate cyber risks, monitoring procedural and technological controls and investing on cybercrime awareness for its employees;
- Novabase is committed to embracing this cyber-risk and data protection posture while developing digital transformation solutions for its customers.

Novabase core segment, which operates under the Celfocus commercial brand, obtained ISO/IEC 27001:2013 and ISO/IEC 27701:2019 certifications in the development, delivery and maintenance of technology solutions, together with all support processes, consolidating Novabase's commitment on these important areas.

This policy can be reviewed and updated periodically to reflect regulatory, market and industry best practice changes.