

NOVABASE

GENDER EQUALITY AND DIVERSITY PLAN

2021 | 2022

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At Novabase, we believe in equal opportunities and mutual respect regardless of ethnicity, gender, religion, beliefs, social background or sexual orientation. These 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.

In this context, the main aspects, documents, practices and processes in place at the Novabase Group, which it believes have an impact on non-financial issues relevant to the Group (namely involving the environment, society, labour, gender equality, non-discrimination, human rights and the fight against corruption), are listed below:

- Novabase's business and the conduct of its employees are governed by applicable law in relevant jurisdictions, and by Novabase's Code of Conduct (published at its corporate website), an internally approved document in effect at the Group since 2011 aimed at guiding the conduct of Novabase's professionals through values cultivated by the Group in its customer and interpersonal relations;
- In 2019, a specific procedure was implemented on how to act in the event of workplace harassment, conduct which Novabase views as unacceptable;
- The company's business is managed in accordance with the Integrated Management System. Novabase's companies are audited by its financial auditors; its certifications in quality (ISO 9001), environmental management (ISO 14001) and occupational health and safety (ISO 45001) are renewed each year after internal and external audits, the latter conducted by certifying entities;
- The company regularly monitors customer satisfaction, along with its employees' satisfaction with company services and other issues of interest to the management;
- In compliance with Portuguese Corporate Governance Institute recommendations regarding the governance of listed companies, and in view of fostering a culture of responsibility and compliance, Novabase has adopted a system for reporting irregularities (known as "SPI") that may occur within its Group. Any report of irregularities made through the SPI is directed to a member of the Audit Board specifically designated for this purpose;
- The company also has "Internal Regulations on Business Dealings with Qualified Novabase, SGPS, S.A. Shareholders" in effect.

All of the above practices address the legal and regulatory requirements applicable to Novabase's business, including:

- Council of Ministers Resolution no. 20/2112 of 08 March 2012, which requires the mandatory adoption of an equality plan by all entities in the state corporate sector, with a view to achieving

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equal treatment and equal opportunities between men and women, eliminating discrimination and reconciling personal, family and professional life;

- This obligation was extended to listed companies through Law no. 62/2017 of 01 August, which passed the scheme for equal representation between men and women in the managing and supervisory boards of entities from the corporate public sector and listed companies. Article 7 of this law establishes the obligation to prepare annual equality plans “aimed at effectively achieving equal treatment and equal opportunities between men and women, eliminating gender discrimination and reconciling personal, family and professional life”;
- Law no. 62/2017, which also requires listed companies to have quotas representing both sexes of 20% (beginning on the first elective General Meeting of Shareholders held after 01 January 2018) and 33.3% (beginning on the first elective General Meeting of Shareholders held after 01 January 2020) vis-à-vis all executive and non-executive directors;
- Sub-section III, articles 23 through 65 of the Labour Code, which gives relevance to the topic of gender equality through general positions on equality and non-discrimination, the prohibition of harassment and equality and non-discrimination according to gender and parenthood.

The Portuguese parliament has also issued a number of recommendations to the government in this regard:

- Resolution no. 116/2012 of 13 July, recommending that it take family support measures to reconcile family life with professional life;
- Resolution no. 260/2017 of 30 November, recommending measures to ensure actual compliance with working hours and the reconciliation of work with family life.

Through Law no. 60/2018 of 21 August, the Portuguese parliament passed measures promoting wage equality between men and women for the same work or work of equal value, through four types of information, evaluation and correction mechanisms, which will enter into force on 21 February 2019.

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MANAGING AND SUPERVISORY BOARD DIVERSITY POLICY

We believe that diversity in our corporate boards helps to improve Novabase's performance and competitiveness. As such, we are committed to the following policy:

- Compliance with Law no. 62/2017 of 01 August, since gender diversity provides different management styles and complementary approaches;
- With regard to age, there must be a balance between experience and maturity and the youth and energy needed for the fast-paced innovation of our highly dynamic sector (information technologies);
- 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.

Novabase will monitor this policy's implementation, in accordance with its corporate governance model, and will review it whenever deemed appropriate.

RESULTS AND INDICATORS

Since no matters involving human rights, corruption or attempted bribery were reported in 2020 to the management of Novabase SGPS, S.A. through the available channels for this purpose, there are no indicators to report in this regard.

As regards gender equality, the key indicator considered is the proportion of men and women vis-à-vis all employees, which should tend to be balanced. This indicator has seen positive progress in recent years. In 2020, 68% of our employees were men and 32% were women. In 2019, the proportion was 69% men and 31% women, while in 2017 and 2018, it was 70% men and 30% women.

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MEASURES AND PRACTICES TO BE IMPLEMENTED, AND THEIR MONITORING

At Novabase, creating an increasingly more inclusive culture is one of our main goals, and the path we have been weaving. Achieving this Quality Plan is a reflection of our journey to make the organization ever more inclusive, with greater diversity and equal access to opportunities and the fulfilment of obligations, adding value to our people, partners and customers.

In this topic, we present developments in the proposed goals of the 2020/2021 Equality Plan, where we have added their status (**Table 1**), a summary of measures implemented in 2020/2021 and the proposed actions for 2021/2022 (**Table 2**).

Building a 2021/2022 Equality Plan is based on a diagnostic performed in 2019, with the help of a support matrix provided by CITE – *Self-Assessment Guide on Gender Equality in Companies*. Novabase analysed the document in depth, exploring its various aspects, for the purpose of surveying existing organizational practices related to each of these topics and finding strong points and areas for improvement in this regard. After this first phase, we aimed to design new action proposals to address the main issues arising from the previous analysis. This diagnostic was carried out by a diverse multidisciplinary team with members from the human resources department, legal department and the business, and has been an ongoing undertaking.

Measures aimed at legal compliance, such as establishing a mandatory system of quotas, for people with a degree of disability of 60% or more, among the employer's total staff, are considered priority measures by the organization.

Compliance with these initiatives will be monitored and assessed based on a monthly follow-up meeting with those in charge of implementing each measure (Table 2). In addition, the Gender Equality and Diversity Committee will meet quarterly with the same goal, and to make decisions on the proposed plan whenever deemed necessary.

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Main drivers	Team	Responsibilities	Monitoring	Status
Gender equality, diversity and inclusion committee	Executive Committee representative (CEO and/or CO)	› Design, ensure and monitor implementation of gender equality, diversity and inclusion measures	Quarterly monitoring meetings and respective meeting minutes.	According to plan
	Human Resources Department (DRH)	› Promote discussion on gender equality, diversity and inclusion trends and practices		
Gender equality, diversity and inclusion operating team	Legal Department	› Lay the groundwork to implement the plan› Ensure coordination of the plan with the Executive Committee	Quarterly monitoring meetings and respective meeting minutes	According to plan
	Investor Relations	› Establish operating team for gender equality and diversity		
Gender equality, diversity and inclusion operating team	Coordinator of operating team for gender equality and diversity (appointed by DRH)	Define an action plan by analysing different aspects of gender equality and diversity:	Quarterly monitoring meetings and respective meeting minutes	According to plan
	Representatives from different areas of DRH (recruitment and selection; training and development; remuneration and career management; mediation; parental protection; culture and values)	› Organizational mission and values › Staff selection and recruitment		
	Representative from labour area of Legal Department	› Vocational training › Career management and remuneration		
	Representative from area of Communication	› Reconciliation of professional, personal and family life › Parental protection and family assistance		
	Representative from area of Organizational Development	› Obligation to respect dignity in the workplace		

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Main drivers	Team	Responsibilities	Monitoring	Status
Gender Equality, Diversity and Inclusion Plan	<p>Gender equality, diversity and inclusion team</p> <p>Managers of approved initiatives and respective working teams</p>	See description of initiatives in Table 2.	In accordance with action plan	See Table 2.

Table 1. Corporate governance model of 2020/2021 Equality Plan

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ASPECT	MEASURES IMPLEMENTED IN 2020/2021	MEASURES FOR 2021/2022
<p>Mission, values, strategy and communication (internal and external)</p>	<ul style="list-style-type: none"> › Updating of the Integrated Management System Policy, which now includes topics on equality, diversity and inclusion; › Dissemination of Inclusive Language QuickGuides (in Portuguese, English and Spanish); › Revision of documents to ensure the use of inclusive language. Examples: Annual Report and Accounts, Code of Conduct, Onboarding Session (NBoarding); › Participation in working teams of “iGen Forum: Organizations for Equality Forum”: Task Force, Working Group #2: “Gender Equality Measures” and Working Group #5: “iGen Training Academy”; › Participation in programs and initiatives with outside entities, such as PWIT – Portuguese Women in Tech (awards and mentoring programs), PWN Lisbon – Professional Women’s Network (networking and training initiatives) and Valor T, an agency for the employability of disabled persons. › Internal communication with three webinars/“roundtables” on Equality, Diversity and Inclusion: “IT jobs have no gender”; “IT jobs welcome disability”; and “Accidental Excluder or Deliberate Includer?”; › Give-away of book “O Longo Caminho para a Igualdade. Mulheres e Homens no Século XXI” (The Long Way to Equality - Women and Men in the 21st century) to all employees, the first book published by iGen in a partnership with the publisher Imprensa Nacional, authored by the duo Ana Maria Magalhães and Isabel Alçada (text) and Susana Carvalhinhos (illustrations); › Creation of an intranet community where all documents can be found, e.g.: Gender Equality and Diversity Plan, together with internal dissemination of communication and awareness for these topics. 	<ul style="list-style-type: none"> › Continued use and promotion of inclusive language both inside and outside the company; › Give-away of book “O Longo Caminho para a Igualdade (“The Long Way To Equality)” to new employees in onboarding kit; › Communication and awareness activities.
<p>Equal access to employment: recruitment and selection</p>	<ul style="list-style-type: none"> › At Novabase, we consider ourselves an inclusive company. In 2021 we have been working to raise awareness about the use of inclusive, gender-free language or any other type of discrimination, particularly in the way we write employment opportunities; › Establishment of partnership with Valor T, an agency for the employability of disabled persons, followed by a presentation and dissemination webinar to the entire Novabase community. 	<ul style="list-style-type: none"> › Consolidation of partnership with Valor T; › New partnerships with entities promoting the employability of disabled persons;

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ASPECT	MEASURES IMPLEMENTED IN 2020/2021	MEASURES FOR 2021/2022
		<ul style="list-style-type: none"> › Promotion of strategies aimed at empowering and developing technical and digital skills for disabled persons.
Performance management and career development	<ul style="list-style-type: none"> › Access to the program of PWN Lisbon – Professional Women’s Network, namely “breakfasts” with role models and training/workshops in the area of individual development; › Mentoring program of PWIT – Portuguese Women in Tech with five mentors from Novabase and respective development activities for mentees, including the sharing of experiences in international projects with diverse multicultural teams. 	<ul style="list-style-type: none"> › Increased awareness on bias, discrimination and treatment; › Sharing and dissemination of mentoring programs, namely the PWN program.
Balance between professional life and well-being and protection of parenthood	<ul style="list-style-type: none"> › Definition and implementation of a flexible/hybrid work policy, offering the highest possible flexibility to support individual work styles and personal and family needs, while simultaneously addressing business needs and promoting the desired corporate culture; › Parental leave does not affect payment of the annual, holiday or Christmas bonuses; › Option to extend health insurance to household. 	<ul style="list-style-type: none"> › New partnerships facilitating a reconciliation between personal and daily professional life (study centres, child transportation, babysitting, athletic activities).
Respect for the dignity and integrity of workers regardless of gender	<ul style="list-style-type: none"> › Increased dissemination of the Code of Conduct and specific procedure for how to act in the event of workplace harassment in different communication channels (onboarding, internal website, email contact) 	<ul style="list-style-type: none"> › Ensure that the Code of Conduct is known, understood and respected in the day-to-day routine. › Encourage every one of us to be ambassadors in this mission.
Remuneration	<ul style="list-style-type: none"> › Performance of a diagnostic on salary distribution at Novabase, examining the last 10 years. 	<ul style="list-style-type: none"> › Updating of diagnostic on salary distribution at the organization;

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ASPECT	MEASURES IMPLEMENTED IN 2020/2021	MEASURES FOR 2021/2022
		› Definition of approaches to be implemented in salary reviews and career advancement to avoid biased and/or discriminatory behaviour.

Table 2. Measures implemented in 2020/2021 and proposed actions for 2021/2022.

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