

NON-FINANCIAL STATEMENTS

PART I – INFORMATION ON POLICIES

A. INTRODUCTION | THE NOVABASE GROUP

Pursuant to article 508-G of the Commercial Companies Code, as amended by Decree Law no. 89/2017 of 28 July, which transposed Directive 2014/95/EU of the European Parliament and of the Council of 22 October 2014 into Portuguese legislation, NOVABASE explains in this document the “information for a sufficient understanding of the developments, performance, position and impact of the group’s activities, at minimum with regard to environmental, social and employee-related issues, equality between men and women, non-discrimination, respect for human rights and fighting corruption and attempted bribery” in relation to the NOVABASE Group for the year ending 31 December 2021.

Information on the NOVABASE Group’s business and corporate structure is available in the 2021 Annual Report and Accounts (Notes to the Consolidated Financial Statements for the year ending 31 December 2021), as well as in the 2021 Corporate Governance Report (Part I, Section B., Point 21).

B. BUSINESS MODEL

This information is described in Part I, Letter B., Section II. “ADMINISTRATION AND SUPERVISION (Board of Directors, Executive Board of Directors and General and Supervisory Board)” from the 2021 Corporate Governance Report.

C. MAIN RISK FACTORS

The NOVABASE Group is subject to both standard market risks and specific risks related to its business. NOVABASE believes that the risk management policy is of vital importance in running and developing a business which has historically had a higher risk appetite profile, since this is intrinsically necessary in such a dynamic and disruptive sector.

NOVABASE also has internal control systems and procedures to prevent and manage risks within the context of its organization and activities.

Additional information on NOVABASE’s internal control and risk management can be found in Part I, Letter C, Section III. “Internal Control and Risk Management” of the 2021 Corporate Governance Report.

D. POLICIES IMPLEMENTED

i. Environment

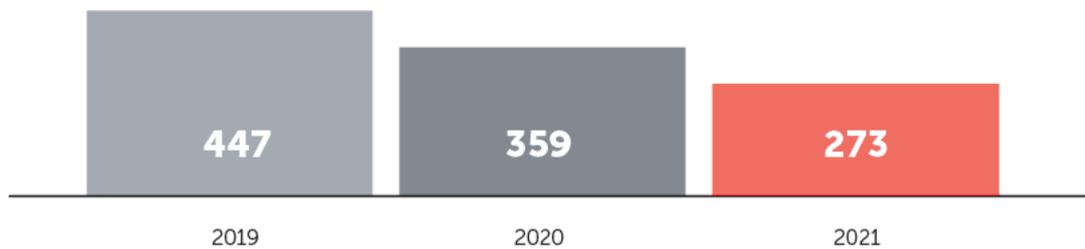
NOVABASE has implemented an Environmental Management System (ISO 14001) as part of its Integrated Management System (Quality, Environment, Occupational Health and Safety). The Integrated Management System is governed by a policy which has been incorporated into NOVABASE's vision and values and aligned with the needs of stakeholders. Internal and external audits are done annually, the latter by certifying entities. As in 2020, no non-conformities were found in 2021.

NOVABASE has a policy which identifies environmental and safety requirements to be met for the acquisition/provision of goods and services.

NOVABASE monitors a number of indicators: consumption of electricity, thermal energy, water, diesel and gas; recycling of plastic, cardboard, paper and glass; and the emission of greenhouse gases.

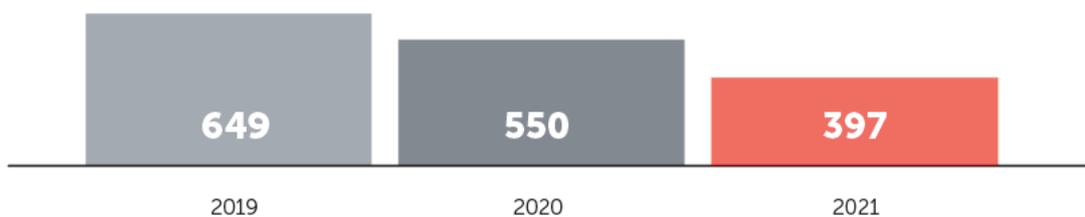
In view of the remote work and/or working from home imposed by rules to fight the Covid-19 pandemic, the following indicators were of note in 2021:

ELECTRICITY CONSUMPTION MW/H



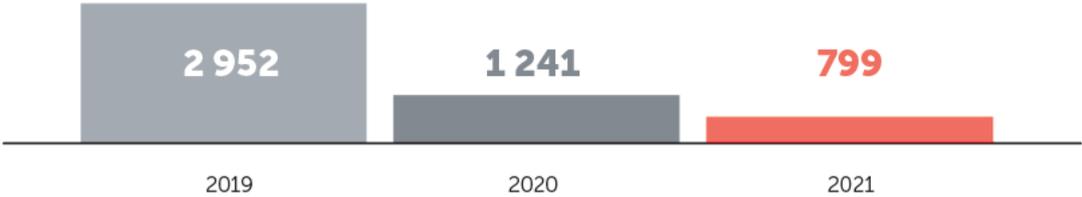
Measures implemented: Centralized Management System to control operating times, replacement of all fluorescent lighting with LED lighting.

THERMAL ENERGY CONSUMPTION IN MW



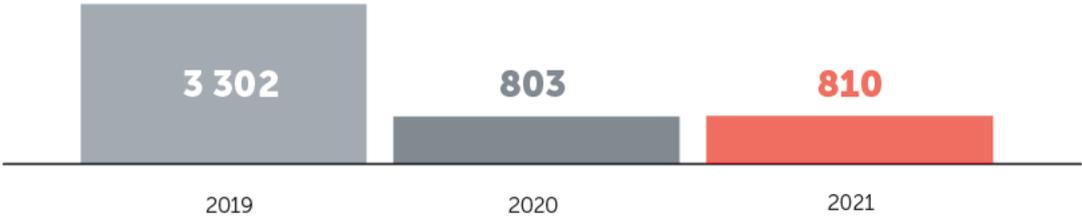
Measures implemented: Centralized Management System to control operating times of the climate control system.

WATER CONSUMPTION M3



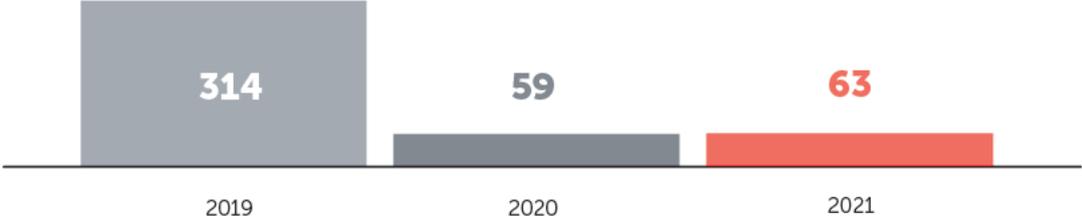
Measures implemented: decreased water flow and installation of regulating valves in faucets.

TOTAL PAPER CONSUMPTION IN KG



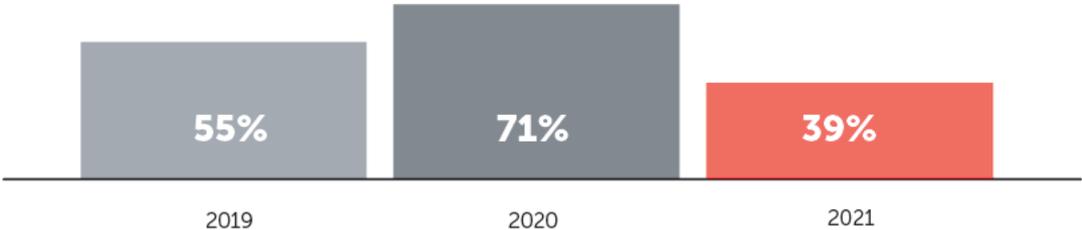
Measures implemented: Awareness on decreasing the use of paper.

PLASTIC PRODUCTION IN KG

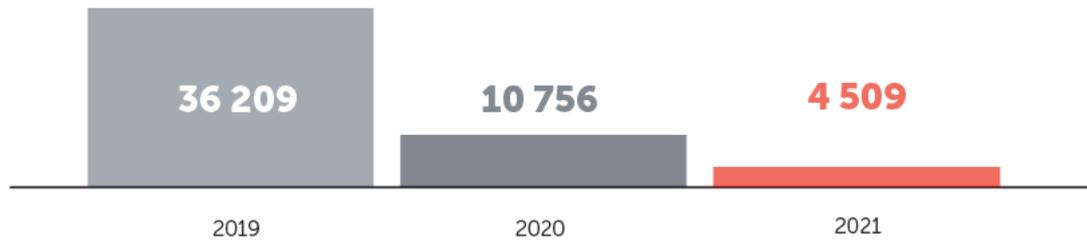


Measures implemented: Replacement of disposable plastic with reusable materials (glass).
The recycling rate went down significantly, while the volume of waste was also reduced.

RECYCLING RATE



AMOUNT OF WASTE IN KG



With regard to emissions:

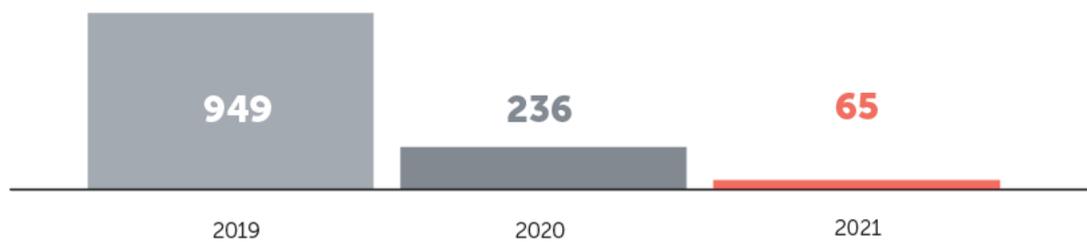
EMISSIONS T/CO2 FLEET



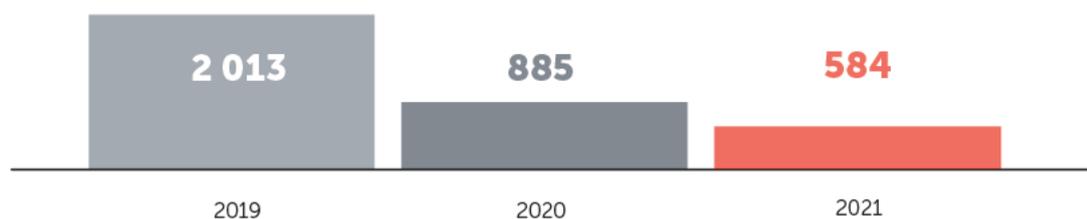
NOVABASE’s fleet has environmentally-friendly vehicles, as shown in the following table:

VEHICLE TYPE	2019	2020	2021
Hybrid	0	0	0
Hybrid Plug In	19	21	43
Electric	4	3	8

EMISSIONS T/CO2 AIR TRAVEL



EMISSIONS T/CO2 FUEL, AIR TRAVEL AND BUILDINGS



In addition to measures already known (e.g. remote meetings, video calls, the existence of offices in other regions), other measures to offset these emissions are being analysed.

In 2020/2021, NOVABASE was part of the “A Tree for the Forest” reforestation campaign (Quercus/CTT). The amounts received for the recovery of toners and ink cartridges sent for recycling were used for the acquisition of kits with native trees and/or shrubs, which will be planted in spring in protected zones or areas affected by fire.

ii. Social and Fiscal

NOVABASE has implemented a number of measures aimed at well-being and a balance between the professional, family and personal lives of its employees. Some noteworthy measures include: Online fitness classes, webinars on the topic of mental health, preventive eye care, campaign to quit smoking, osteopathy appointments, psychology appointments to help those in need (with guaranteed anonymity).

NOVABASE implemented the “Second Life” program for equipment at the end of its professional life, allowing NOVABASE Group employees to use this equipment at home. 70 pieces of equipment were sold in 2021.

In 2021, NOVABASE developed and participated in several welfare initiatives, including the following:

- Almada-Seixal Health Centre Group, the Seixal Municipality “Via Verde Saúde” (VVS) service for users without a family physician:

- 7 laptops;
- 6 monitors.

- Celfocus

- “Zero Waste Policy”: meaning that any material sent or given to the people of Celfocus should have a utility and useful life beyond the time denoted. Being useful and reusable is a matter of principle.
- Volunteer program: allowing everyone to take one work day to volunteer at an institution of their choice.

The results of the initiatives carried out in 2021 were:

- Volunteer Day – 91 hours of volunteering by 16 employees.
- Donation of technology equipment:
 - Student Keep – 7 computers + 7 monitors
 - 12 Workstations – monitors + computers
- Collection and donation of non-food items:
 - Portuguese Refugee Council

- Senhora da Conceição Parish Church
 - Angels Animal Shelter
 - Society of Saint Vincent de Paul (SSVP) volunteer organization – Senhora da Hora.
- Neotalent
 - Donation to Banco do Bebê - Neotalent supported this association by donating articles of clothing and toiletries needed for the layettes of newborns, who are often born without essential fundamental items for their first months of life. Banco do Bebê, headquartered at the Alfredo da Costa maternity ward, also needed technology equipment (such as cell phones to install apps which could be used via wireless), allowing contact between mothers and their families.

In total, the following were donated:

- 50 articles of clothing
 - 50 toiletry articles
 - 8 packages of infant formula
 - 6 baby bottle sterilizers
 - 1 breast pump
 - 1 wireless landline phone
 - 6 cell phones
- Donation to Just a Change - through the Association of Professional Spanish Women in Lisbon (AMPEL), presided over by a Neotalent employee, Neotalent sponsored a drawing in the benefit raffle. This initiative raised funds for a non-profit organization as part of AMPEL's Solidarity Christmas Dinner. Neotalent donated a pack of "Odisseias" experiences which, together with other raffle items, helped to raise €1,600 (one thousand, six hundred euros) for the Just a Change association, which is dedicated to rehabilitating the homes of needy people and families in Portugal, thanks to the mobilization of volunteers from various countries.

iii. Employees and Gender Equality and Non-Discrimination

Council of Ministers Resolution no. 19/2012 of 08 March 2012 requires the mandatory adoption of an equality plan by all entities in the state corporate sector, with a view to achieving 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 1 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”.

In this context, on 15 September 2021, NOVABASE presented a new version of its Gender Equality and Diversity Plan with measures and practices for the years 2021/2022, including the following:

- 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;
- Consolidation of partnership with Valor T (employment agency for disabled persons);
- Sharing and dissemination of mentoring programs, namely the PWN program.

The key indicator is the proportion of men and women vis-à-vis all employees, which should tend to be balanced. In 2021, this indicator had a proportion of 69% men and 31% women, slightly different from 2020 when the proportion was 68% men and 32% women.

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.

For this reason, we also 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.

iv. Human Rights

NOVABASE ensures and has specific principles related to (i) respecting human rights (ii) collective bargaining, and (iii) guaranteed non-existence of child and forced/mandatory labour. It has a Code of Conduct, which was reviewed and approved by the Board of Directors in 2021, to solidify these principles. This Code lays out the principles and rules governing NOVABASE's relationships with its stakeholders, in the broadest sense. They represent a commitment to NOVABASE's customers and partners, but also a commitment by and to its employees in terms of how they relate with the company and among themselves. It covers a range of topics from integrity, transparency, respect, health and safety, the use of information, intellectual property, the use of resources, social and environmental responsibility, managing conflicts of interest, corruption and bribery, including various aspects such as legal compliance, best environmental and labour practices, including human rights, and applying these principles in third-party procurement. The Code of Conduct is available at the website's institutional area and on the Intranet. Our ethical concerns also extend to our suppliers and partners. The principles and rules described in NOVABASE's Code of Conduct must be strictly followed by any partner or supplier working with NOVABASE, and incorporated into their day-to-day routines. In its contractual agreements with suppliers, NOVABASE includes a commitment to adhere to NOVABASE's Code of Conduct.

v. Anti-Corruption and Attempted Bribery

NOVABASE has adopted a whistleblowing system for reporting irregularities (known as "SPI") that may occur within the Group. Any report of irregularities made through the SPI is directed to a member of the Audit Board specifically designated for this purpose. Additional information on reporting irregularities through NOVABASE's SPI can be found in Part I, Letter B., Section II. "WHISTLEBLOWING" of the 2021 Corporate Governance Report.

Also in 2021, Law no. 93/2021 of 20 December was published establishing the general scheme for protecting whistleblowers, transposing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 into the Portuguese legal system. Given that this law will enter into force 180 days after the publication of the legal instrument, NOVABASE is currently weighing up amendments made regarding the protection of whistleblowers, in order to adapt its current SPI to comply with the new legal requirements.

Council of Ministers Resolution no. 37/2021 of 6 April passed the 2020-2024 National Anti-Corruption Strategy, which calls all sectors, including the private corporate sector, to be part of a joint anti-corruption effort primarily focused on the prevention of corruptive phenomena.

NOVABASE, fully aware of these risks, albeit potential, sought to identify them through the Prevention Plan for the Risks of Corruption and Related Offences in the specific ecosystem to which NOVABASE belongs and address them, thereby ensuring that our corporate culture is rooted in the fundamental values of legality, uprightness, trust and ethics. NOVABASE approved the Plan in December 2021 and published it at its website.

PART II – INFORMATION ON STANDARDS AND GUIDELINES FOLLOWED

In view of the NOVABASE Group's size, the nature of its business, its business model and the industries in which it operates, no formal policies have been approved for all of the items referred to in article 508-G (2) of the Commercial Companies Code. Nonetheless, various aspects of the NOVABASE Group's business are governed by applicable legislation, and by applicable regulations and recommendations of the Portuguese Securities Market Commission and other domestic and international entities. In addition, the NOVABASE Group internally uses a number of reference documents, diligence proceedings and systems regarding practices to be employed in certain areas, taking the Group and its needs into account, together with its employees, professionals and other stakeholders, with a view to ensuring sustainable growth. NOVABASE Group companies are also subject to a number of different internal and external audits. 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 employees and professionals 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;
- The company's business is managed in accordance with the Integrated Management System (Quality, Environment, Occupational Health and Safety);
- 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' and professionals' 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 whistleblowing 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. Additional information on reporting irregularities through NOVABASE's SPI can be found in Part I, Letter B., Section II. "WHISTLEBLOWING" of the 2021 Corporate Governance Report;
- The company also has "Internal Regulations on Business Dealings with Qualified NOVABASE, S.G.P.S. S.A. Shareholders" in effect.