

# NON-FINANCIAL STATEMENTS

The topic of Sustainability has gained relevance over the last years as a means of drawing attention to the ever-mounting urgency of fighting climate change, promoting equality, diversity and inclusion and sustainable economic development, through business transparency and ethics.

The digitalization of economies is a global trend that gained great prominence after the COVID-19 pandemic. The NOVABASE Group, as a technology company, plays a critical role in this transformation, contributing not only directly through its business strategy, but also indirectly through its volunteer initiatives to promote more digital inclusion.

Fully aware of global challenges and needs, the NOVABASE Group has aligned itself with the topic of Sustainability, making it part of its strategy and, through its commercial brand Celfocus, has adhered to the ten principles of the United Nations Global Compact (UNGC), assuming its global commitment to a more sustainable future. Furthermore, Celfocus now has a Sustainability Committee as well, supervised by a member of Celfocus' management, to boost its importance in decision-making.



## NOVABASE GROUP CONTRIBUTION

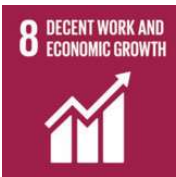
In its 2030 Agenda, the United Nations established a set of 17 Sustainable Development Goals (SDGs) on a global scale. During 2023, the NOVABASE Group, within the scope of the technology sector where it does business, evaluated how its current strategy and activities could contribute towards, and more proactively impact, the SDGs.

After an internal assessment, NOVABASE identified six SDGs as priority to its strategy and to which it could contribute more proactively:



4.4

Quality education: NOVABASE, through Celfocus, has implemented a number of volunteer initiatives, in particular the participation in the Technovation Girls programme with mentoring of young female student teams in the development of social sustainability projects. This mentoring is also aimed at helping to attract more women to the areas of Science, Technology, Engineering and Mathematics (“STEM”), thereby making the job market more balanced, and allowing more female talent to be hired.



8.3

Decent work and economic growth: NOVABASE provides a safe and healthy workplace, ensuring that all labour-related practices comply with legal regulations concerning labour, health and safety at all of the locations where it operates.



9.4, 9.5

Industry, innovation and infrastructure: as a technology sector company, NOVABASE aims to persevere with generally more advanced technology offerings targeting the financial services and telecommunications industries.



10.3

Reduced inequalities: reinforcing NOVABASE’s commitment to developing practices and policies that promote diversity, equality and inclusion at work, we signed the “Portuguese Diversity Charter” in 2023, an initiative of the Portuguese Association for Diversity and Inclusion in partnership with the High Commission for Migration.



12.5, 12.6

Responsible consumption and production: beginning in 2025, NOVABASE will acquire 100% of its electricity from renewable energies at its facilities in Portugal, while simultaneously upholding the principles of a circular economy by promoting recycling and reducing and streamlining resources.



17.16

Partnerships for the goals: NOVABASE is committed to the ten universal principles of the UNGC through Celfocus, which has also become an associate of GRACE – Empresas Responsáveis.

## OUR AMBITION FOR SUSTAINABILITY

In order to contribute directly towards the above SDGs, and indirectly to the remaining ones, NOVABASE has set short, medium and long-term goals, divided into three areas: Environmental, Social, and Governance (“ESG”).

- ENVIRONMENTAL

ENVIRONMENTAL	2023	2027T	2030T	2035T
100% transition to completely electric or hybrid vehicles by 2035	58%	70%	>90%	100%
100% transition to renewable energy consumption	35%	100%	100%	100%
Reduce carbon emissions per employee originating from business travel and emissions associated with employee commuting (t/CO2 per employee)	0.72	-10% vs. 2023	-25% vs. 2023	-35% vs. 2023

- 100% TRANSITION TO COMPLETELY ELECTRIC OR HYBRID VEHICLES BY 2035

With a view to reducing its direct greenhouse gas emissions (Scope 1), NOVABASE is committed to transitioning to completely electric or hybrid vehicles by 2035, in line with environmental concerns and global sustainability trends.

This initiative reflects a growing awareness on the importance of being less dependent on fossil fuels and the environmental impact tied to their use. The use of electric and hybrid vehicles not only demonstrates a commitment to technological innovation, but also to ecological responsibility, which is crucial towards mitigating climate change and pollution.

- 100% TRANSITION TO RENEWABLE ENERGY CONSUMPTION

Reducing Scope 2 emissions is also a priority for NOVABASE. Along these lines, NOVABASE plans to transition to 100% renewable energy consumption in the coming years, as demonstrated by the respective Guarantee of Origin Certificates, underscoring the Group’s growing concerns of reducing the consumption of fossil fuels and preserving the environment.

With this commitment, NOVABASE thus aims to include its value chain in its ecological responsibility as well, combining technological innovation with energy efficiency, and aligning its strategic vision with its stakeholders.

- REDUCE CARBON EMISSIONS ORIGINATING FROM BUSINESS TRAVEL AND EMISSIONS ASSOCIATED WITH EMPLOYEE COMMUTING

The goal of reducing carbon emissions originating from business travel by NOVABASE employees, according to Scope 3, is yet another company commitment to sustainability. NOVABASE will continue to use its Nearshore Agile delivery model whenever possible. In addition, NOVABASE will work daily with its customers to help them in the transition to a more digital reality with low carbon emissions.

- SOCIAL

SOCIAL	2023	2027T	2030T	2035T
Celfocus e-NPS	23	>25	>30	>35
Employee diversity training	13%	60%	70%	>70%
Volunteer hours	47	700	1200	>1200

- CELFOCUS E-NPS

The Celfocus Employee Net Promoter Score (e-NPS) is used by NOVABASE to evaluate the satisfaction of its employees. This metric provides fundamental insights on employee well-being and commitment, and critical aspects for NOVABASE’s business sustainability. The e-NPS thus plays a crucial role at NOVABASE, since it not only reflects the satisfaction of its employees, but also allows it to gauge the NOVABASE Group’s corporate social responsibility. Monitoring positive progress in this metric is therefore important.

- EMPLOYEE DIVERSITY TRAINING

NOVABASE views the training of its employees as a fundamental aspect of their development and competitiveness in today’s labour market. Constant fast-paced technology advancements and changing business models demand ongoing employee training, making this essential for NOVABASE.

NOVABASE embraces the management of diversity, equality and inclusion as an integral part of its global strategy, and thus as building blocks that are universal to all processes of talent management at our organization. This commitment applies to all companies belonging to the group, and to all regions.

Diversity training at NOVABASE is of the utmost importance as an essential means of leveraging an environment that remains inclusive and embraces differences.

Reinforcing NOVABASE’s commitment to developing practices and policies that promote diversity, equality and inclusion at work, we signed the “Portuguese Diversity Charter” in May 2023, an initiative of the Portuguese Association for Diversity and Inclusion in partnership with the High Commission for Migration.

- VOLUNTEER HOURS

Social responsibility to the community is also a key point in the evolution of NOVABASE and its employees. As such, NOVABASE has created new social responsibility initiatives as part of its “Acting with a Purpose” programme. Through these initiatives, we want to promote the NOVABASE Group’s commitment to our community and our desire to give back, by supporting worthy causes and amplifying positive social changes.

- GOVERNANCE

GOVERNANCE	2023	2027T	2030T	2035T
Significant cyber-security breaches	0	0	0	0
Supplier ESG assessment	0%	>80%	>90%	>90%
Employee ethics training	60%	>80%	>90%	>90%

- CYBER-SECURITY

Mounting technology integration and sophistication have heightened companies' exposure to various types of cyber-risk, with potential financial, operational and reputation losses.

Over the years, NOVABASE has been reinforcing measures to mitigate this risk, monitored directly by the Chief Information Security Officer, namely by investing in procedural and technological controls and training on best remote work practices and cybercrime awareness for employees.

As a player geared towards the values of IT, NOVABASE works proactively to protect data and promote cyber-security values, being fully dedicated to mitigating cyber-risks, by monitoring procedural and technological controls and investing in employee awareness on cybercrime.

NOVABASE is dedicated to embracing this stance towards data protection and cyber-risks as it develops digital transformation solutions for its customers.

As a means of commitment to the issue of cyber-security, NOVABASE, through its commercial brand Celfocus, keeps certifications in ISO/IEC 27001 (Information Security) and ISO/IEC 27701 (Private Information) as a top priority.

Thus, and in line with this commitment, NOVABASE's goal in the coming years is to have no major shortcomings in cyber-security.

- SUPPLIER ESG ASSESSMENT

Every NOVABASE Group employee is required to take on a personal commitment of integrity. Likewise, on the part of its suppliers, NOVABASE expects and demands a high standard in environmental, social and ethical conduct rooted in policies, codes and practices recognized by the market.

NOVABASE has implemented a process that sets rules to be followed by its suppliers at the time of signing and executing a service provision agreement between them and NOVABASE. As such, all NOVABASE areas that hire suppliers implement this procedure, making them aware of the Service Provider Regulations while still in the contractual negotiation phase, subsequently ensuring that these regulations are followed by service providers at the time of performing the service, and taking the necessary measures if this does not occur.

Prior to the start of service provision, the individual in charge of the contracted service guarantees that the supplier has filled out all required documentation, stating its commitment to fulfilling the Service Provider Regulations, Code of Ethics, Partner

and Supplier Corruption Prevention Policy, national and community legislation and regulations in force concerning environmental issues (product and service conformity, emissions control and waste management) and social issues such as minimum wage, working hours, and the minimum legal age for the performance of work.

NOVABASE will continue to monitor its suppliers and evaluate them annually, reinforcing the policies currently in effect whenever necessary and so justified. In addition, starting in 2024, NOVABASE will begin a sustainability assessment of its top tier<sup>(1)</sup> suppliers based on all existing suppliers, together with all new ones.

The evaluation will be done by means of an ESG questionnaire aligned with new European reporting standards that will soon enter into force, with the goal of obtaining a response rate for the various years as shown in the above table. The evaluation results will then be analysed, and all suppliers classified as "high risk" will be subject to an action plan aimed at improving their rating, with a maximum reevaluation period of 12 months.

With this annual assessment of ESG issues, NOVABASE aims to align its ESG goals with the entire value chain, including suppliers.

- **EMPLOYEE ETHICS TRAINING**

Business ethics have a truly significant weight at the NOVABASE Group. The training of its employees on topics involving business ethics, such as preventing corruption and the code of ethics, is critical for sustainable success and integrity. With this type of training, we aim to uphold a corporate culture which prioritizes ethical values, positively influencing decisions and the daily behaviour of NOVABASE's employees. By emphasizing the importance of honesty, transparency and responsibility, employees become more aware of the impacts of their actions not only within the company, but also in the market and community at large.

With a clear understanding of what constitutes inappropriate behaviour and the internal policies for reporting and managing such incidents, NOVABASE's employees are better prepared to avoid potential ethical offences.

In recent years, NOVABASE has implemented various measures aimed at contributing more towards issues involving sustainability, whether through internal initiatives or annual training of its employees.

<sup>1</sup>Top-tier suppliers are defined as those whose goods or services would affect NOVABASE's activities if they discontinued their supply or operation in an unexpected manner. These suppliers provide services in the areas of technology, law, security and talent.

## **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, and article 29-G (1d) of the Securities Code, as amended by Law no. 99-A/2021 of 31 December, 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 ended 31 December 2023.

### **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 2023 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 2023 Corporate Governance Report.

### **D. IMPLEMENTED POLICIES**

#### **i. Environmental**

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 2022, no non-conformities were found in 2023.

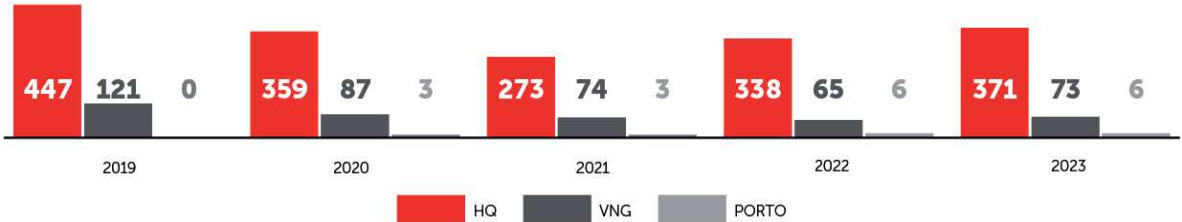
NOVABASE has a policy which identifies environmental and safety requirements to be met for the acquisition/provision of goods and services.

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.

Despite keeping the hybrid work model as in previous years, the average number of employees at the company’s headquarters saw an increase. This is highlighted by the following indicators:

ELECTRICITY CONSUMPTION (MW/H)



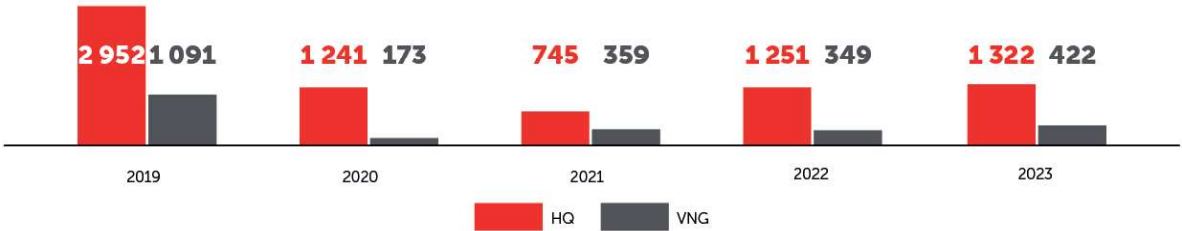
Measures implemented: Centralized Management System to control operating times, replacement of all fluorescent lighting with LED lighting.

THERMAL ENERGY CONSUMPTION (MW)



Measures implemented: Centralized Management System to control operating times of the climate control system. Last year, we implemented thermal insulation for heat exchangers, and thermal insulation for primary circuit accessories (valves, filter and picking) of the substation of the thermal plant.

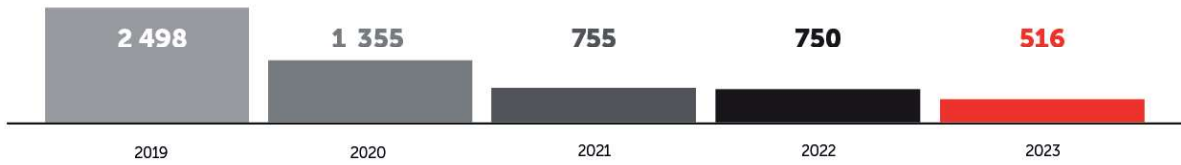
WATER CONSUMPTION (M³)



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

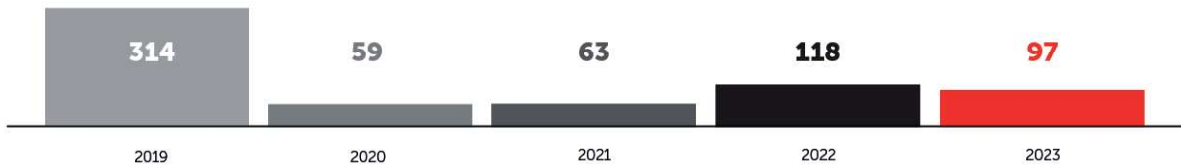


CONSUMPTION OF REAMS OF PAPER (KG)



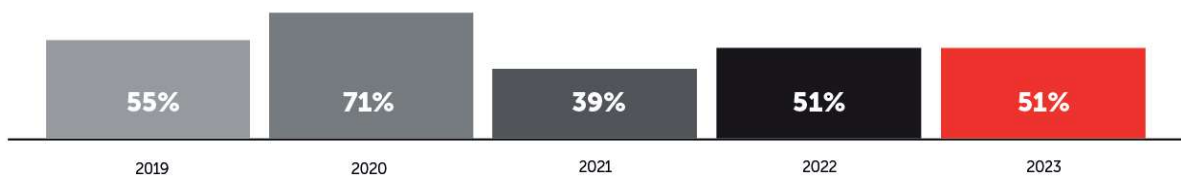
Measures implemented: awareness on decreasing the use of paper. Identification of suppliers who send hardcopy invoices, followed by a request for electronic billing.

PLASTIC PRODUCTION (KG)

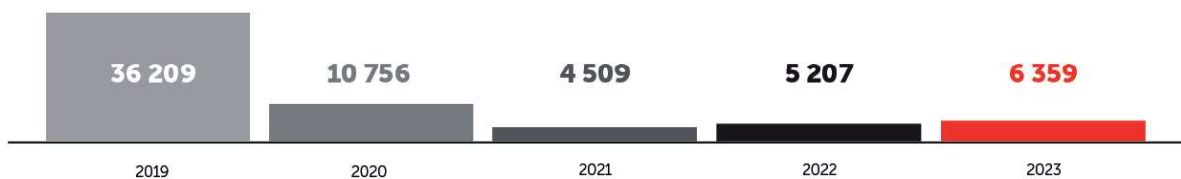


In the last quarter of the year, it was decided to end the use of daily plastic bottles. We made glass bottles available again in the meeting rooms, while also making glass cups available for common use in all of the break rooms. We were also able to wrap up the year with a decrease in the consumption of plastic.

RECYCLING RATE



QUANTITY OF WASTE (KG)



With regard to emissions:

**EMISSIONS FLEET (t/CO<sub>2</sub>)**

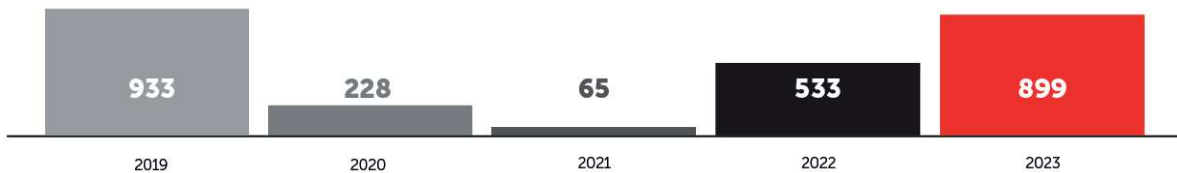


NOVABASE has less-polluting vehicles in its fleet, this year with the acquisition of an additional 94 plug-in hybrid vehicles and four electric vehicles.

As shown in the following table, our fleet currently has a total of 184 plug-in hybrid vehicles, more than twice the previous year, and 20 electric vehicles.

VEHICLE TYPE	2019	2020	2021	2022	2023
Hybrid	0	0	1	1	1
Plug-in Hybrid	19	21	46	90	184
Electric	4	3	9	16	20

**EMISSIONS AIR TRAVEL (t/CO<sub>2</sub>)**



**EMISSIONS (t/CO<sub>2</sub>)**



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

## 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: general health appointments, at no charge, twice per week, osteopathy appointments, psychology appointments, at no charge, to help all those in need (with guaranteed anonymity), healthy breakfast in partnership with "Celeiro".

NOVABASE implemented the "Second Life" programme for equipment at the end of its professional life, allowing NOVABASE Group employees to use this equipment at home. 109 pieces of equipment were sold in 2023.

In 2023, we participated in the following welfare initiatives:

- 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.

## iii. Employees and Gender Equality and Non-Discrimination

At NOVABASE, we believe in equal opportunities and mutual respect regardless of each individual'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. NOVABASE embraces the management of diversity, equality and inclusion as an integral part of its global strategy, and thus as building blocks that are universal to all processes of talent management at our organization. This commitment applies to all companies belonging to the group, and to all regions. NOVABASE also defends the need to boost awareness on policies for the integration of women, and the eradication of any obstacles that may breach the principle of equal opportunities and non-discrimination based on sex and gender. Professional growth should be valued based on the skills, capacities and knowledge of our people, regardless of their sex, gender or identity. Reinforcing NOVABASE's commitment to developing practices and policies that promote diversity, equality and inclusion at work, we signed the "Portuguese Diversity Charter" in May 2023, an initiative of the Portuguese Association for Diversity and Inclusion in partnership with the High Commission for Migration. 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:

- Equality plan: presents a set of measures, based on internal analyses and diagnostics, aimed at promoting equal treatment and opportunities between men and women, and eliminating any discrimination based on sex, gender or identity;
- 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, a conduct which NOVABASE considers to be 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 and employee satisfaction with company services and other issues of interest to the management;
- In compliance with Law no. 93/2021 of 20 December and the Portuguese Corporate Governance Institute's 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;
- The company also has "Internal Regulations on Business Dealings with Qualified NOVABASE, S.G.P.S., 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 8 March 2012, which 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";
- Article 5 (1) of Law no. 62/2017 also requires listed companies to have quotas representing both genders of 20% (beginning on the first elective General Meeting of Shareholders held after 1 January 2018) and 33.3% (beginning on the first elective General Meeting of Shareholders held after 1 January 2020) vis-à-vis all executive and non-executive directors comprising the managing boards;
- Sub-section III and Sub-section IV, articles 23 through 65 of the Labour Code, which give 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 personal 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 entered into force on 21 February 2019.

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 1 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 revise it whenever deemed appropriate.

The IT sector continues to be predominantly male. At the NOVABASE Group, this indicator has remained stable in recent years. In 2023, the distribution of men and women was 68% and 32%, respectively.

In August 2023, NOVABASE unveiled a new version of its Gender Equality and Diversity Plan, in which it identified the measures and practices implemented in 2023 and defined measures and practices to be developed in 2023/2024. In 2023, these included the following:

- Signing of the Portuguese Diversity Charter, an initiative of the Portuguese Association for Diversity and Inclusion in partnership with the High Commission for Migration.
- Participation in the Technovation Girls programme with mentoring of young female student teams in the development of social sustainability projects.
- Internal and external communication of work done in the Technovation Girls programme, giving visibility to the goals and results achieved by the teams.
- Celebration of days with symbolic meaning in the context of diversity.
- Promotion and monitoring of the use of inclusive language in all aspects of internal and external communication.
- Use of inclusive language, without gender or any other type of discrimination, when

- writing job opportunities.
- Establishment of a partnership with Valor T, an employment agency for disabled persons.
- Establishment of a partnership with the Salvador Association.
- Establishment of partnership with IEPF (Institute for Employment and Vocational Training).
- Access to the programme of PWN Lisbon – Professional Women’s Network, namely “breakfasts” with role models, and training/workshops in the area of individual development for women with high potential, at starting and intermediate career levels.
- Launch, analysis and dissemination, to all people, of the Celfocus People Survey.
- Expansion of the flex benefits plan with equipment needed for remote work.
- Participation in programmes and initiatives with external entities, such as PWIT – Portuguese Women in Tech.
- Initiatives for sharing knowledge and/or discussion forums on inclusive work practices, with a focus on mental health.
- Creation of an Interview Techniques course and training sessions for the first group of ten people.

#### **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 between 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 to 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**

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.

According to this strategy, companies must take on a central role in promoting and defending ethical relationships between the public and private sectors, as well as business relationships within the private sector, a place where the phenomenon of corruption also occurs.

The adoption and implementation of regulatory compliance programmes at companies have been cited as a means of greater private sector engagement in fighting corruption, particularly when aimed at preventing and cracking down on practices against company standards, against the company or through the company from failing to adopt them.

In accordance with the General Scheme for Preventing Corruption, NOVABASE, with a view to preventing, detecting and punishing acts of corruption and related offences committed against or through the company, has adopted and implemented a Regulatory Compliance Programme that includes:

- i. Prevention Plan for the Risks of Corruption and Related Offences;
- ii. Code of Conduct;
- iii. Training Programme; and
- iv. Whistleblowing Channel.

i. Prevention Plan for the Risks of Corruption and Related Offences  
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 2021 and published it at its website.

ii. Code of Conduct  
The Code of Conduct describes the behaviours, principles and values that everyone must have while doing their jobs, such as: acting with integrity, using ethical and proper behaviour, repudiating any act of corruption or related offence, making informed decisions and complying with legal and regulatory obligations.

The Code of Conduct is for everyone who works with or for NOVABASE, namely employees, subcontractors, suppliers and partners.

iii. Training programme  
NOVABASE has created a training programme with the following goals:

- To provide information to all of its stakeholders and demystify the legal concept of the crime of corruption and other related offences;
- To define the role of NOVABASE and its employees in fighting corruption;
- To identify specific situations of corruption;
- To identify best practices in running its business as a means of preventing and fighting corruption; and

- To provide the necessary information and guidance so that its employees know how to act in specific situations of corruption.

#### iv. Whistleblowing Channel

With a view to fostering a culture of responsibility and compliance, NOVABASE has adopted, in accordance with applicable legal and regulatory provisions, a system for reporting irregularities (known as "SPI") that may occur within its Group.

The SPI was established to receive and handle reports of any irregularities that may occur within the Group's companies, pursuant to article 21 of the Securities Code, observing the principles of confidentiality and non-retaliation with regard to whistleblowers<sup>1</sup> and third parties assisting or related to them.

The reporting of irregularities through the SPI is directed to the Chairperson of the Audit Board, with the Audit Board designating the entity or person who will follow up on communications received ("Head of SPI").

The Chairperson of the Audit Board, the members of the Audit Board (in charge of receiving complaints) and the Head of SPI must act under criteria of independence, impartiality, confidentiality, data protection and secrecy, and ensure that there are no conflicts of interest.

Under the system implemented, whistleblowers have access to a direct and confidential channel for reporting to the Audit Board any potential irregularities occurring within the NOVABASE Group.

<sup>1</sup> Under the definition found in article 5 of Law no. 93/2021 of 20 December.



## **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 the Portuguese Corporate Governance Institute's 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 by employees or other stakeholders to the Chairperson of the Audit Board specifically designated for this purpose. Furthermore, this whistleblowing system used by NOVABASE and described herein also includes an internal whistleblowing channel, accessible by non-employees as well, as provided for by law and by recommendation II.2.4. of the IPCG Corporate Governance Code. Additional information on reporting irregularities through NOVABASE's SPI can be found in the document "Reporting Irregularities" (available in the institutional area of the website).

- The company also has "Internal Regulations on Business Dealings with Qualified NOVABASE, S.G.P.S., S.A. Shareholders" in effect.

# EUROPEAN TAXONOMY

As in previous years, in light of Directive 2014/95/EU of the European Parliament and of the Council of 22 October 2014 and Article 29-G(1)(d) of the Securities Code, as amended by Law 99-A/2021 of 31 December, NOVABASE is subject to the publication of non-financial information (chapter 8 of this document), and is also covered by Article 8 of the European Union Taxonomy Regulation (EU2020/852, hereinafter referred to as the "Taxonomy Regulation").

The Taxonomy Regulation defines criteria for considering an activity environmentally sustainable. This regulation is key to achieving carbon neutrality by 2050, as defined by the European Commission.

The Taxonomy is organized into three components:

1. Activities that make a significant contribution ("SC") to one or more of the six EU climate objectives, as detailed in Articles 10 to 15 of the Taxonomy Regulation (1. Mitigation of climate change; 2. Adaptation to climate change; 3. Sustainable use and protection of water and marine resources; 4. Transition to a circular economy; 5. Pollution prevention and control; 6. Protection and restoration of biodiversity and ecosystems);
2. Does Not Significantly Harm ("DNSH") any of the climate objectives under Article 17 of the Taxonomy Regulation (climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, protection and restoration of biodiversity and ecosystems);
3. Comply with the Minimum Social Safeguards ("MSS"), in accordance with Article 18 of the Taxonomy Regulation.

Taking the Climate Delegated Act into account, NOVABASE has analysed all the activities eligible for the Taxonomy that could fit into the IT services market, where NOVABASE operates. To this end, NOVABASE provides the following information:

- Its "eligible" activities, based on the list of environmentally sustainable economic activities defined by the Taxonomy;
- Its activities "aligned" with the three Taxonomy components mentioned above;
- Disclosure of activities aligned with the Taxonomy in terms of amount and percentage of Turnover (revenues from green activities), OpEx (operating costs for green activities) and CapEx (investments in green activities).

## **TURNOVER**

### **ACTIVITIES ELIGIBLE FOR TAXONOMY**

An assessment was done of the NOVABASE Group's economic activities, which concluded that those eligible for Taxonomy and generating turnover for the Group are as follows:

- MAC 8.1. Data processing, hosting and related activities: Storage, manipulation, management, movement, control, display, switching, interchange, transmission or processing of data through data centres, including edge computing (NACE code: J.63.11);
- MAC 8.2. Data-driven solutions for GHG emissions reductions: development or use of ICT solutions that are aimed at collecting, transmitting, storing data and at its modelling and use where those activities are predominantly aimed at the provision of data and analytics enabling GHG emission reductions. Such ICT solutions may include, inter alia, the use of decentralized technologies (i.e. distributed ledger technologies), Internet of Things (IoT), 5G and Artificial Intelligence (NACE code: J.61, J.62 and J.63.11).

Turnover corresponds to the total sales coming from the above-mentioned Taxonomy-eligible economic activities, as defined in point 1.1.1. of Annex I to Commission Delegated Regulation (EU) 2021/2178. Thus, the eligible numerator corresponds to the share of turnover coming from MAC 8.1 and MAC 8.2 eligible activities. The denominator corresponds to the Group's total turnover in 2023, the value of which can be reconciled with the consolidated financial statements in the Annual Report 2023, Consolidated Financial Statements.

Turnover: Proportion of turnover from products or services associated with Taxonomy-aligned economic activities - Template of Annex II to Commission Delegated Regulation (EU) 2021/2178

TURNOVER	2023			Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")						Taxonomy-aligned proportions of turnover, 2022	Category (enabling activity)	Category (transitional category)	
	Code	Absolute turnover	Proportion of turnover	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems				Minimum safeguards
		(€)	%	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																			
...		0	0%																
<b>Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		0	0%																
<b>Of which, enabling</b>			0%	0%	0%	0%	0%	0%	0%									E	
<b>Of which, transitional</b>			0%	0%															T
<b>A.2. Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																			
				EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL										
8.1. Data processing, hosting and related activities	MAC 8.1	46 690 618	35%		N/EL	N/EL	N/EL	N/EL	EL	N/EL									
8.2. Data-driven solutions for GHG emissions reductions	MAC 8.2	1 299 973	1%	EL	N/EL	N/EL	N/EL	N/EL	EL	N/EL							0%		
<b>Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned) (A.2.)</b>		47 990 590	36%														0%		
<b>Total (A.1.+A.2.)</b>		47 990 590	36%																
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
<b>Turnover of Taxonomy-non-eligible activities (B)</b>		84 565 410	64%																
<b>Total (A+B)</b>		132 556 000	100%																

## **OPERATING EXPENSES (OPEX)**

Eligible operating expenses correspond to the portion that is related to the assets and economic activities defined by the taxonomy, incorporating all non-capitalized direct costs from research and development (R&D) activities, costs arising from the acquisition for production of economic activities aligned with the taxonomy and with individual measures that enable the transformation of the activities in question into low-carbon activities or that enable reductions in greenhouse gas emissions.

- MAC 6.15. Infrastructure enabling low-carbon road transport and public transport: Construction, modernisation, maintenance and operation of infrastructure that is required for zero tailpipe CO<sub>2</sub> operation of zero-emissions road transport, as well as infrastructure dedicated to transshipment, and infrastructure required for operating urban transport.

The amount used for the calculation in the table corresponds to the average electricity costs for charging electric and plug-in hybrid cars at the Group's facilities during 2023 and 2022.

OpEx: Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities - Template of Annex II to Commission Delegated Regulation (EU) 2021/2178

OPEX	2023			Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")						Taxonomy-aligned proportions of turnover, 2022	Category (enabling activity)	Category (transitional category)	
	Code	OpEx	Proportion of turnover	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems				Minimum safeguards
		(€)	%	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																			
...		0	0%																
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1.)		0	0%																
Of which enabling																			
Of which, transitional																			
<b>A.2. Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																			
				EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL										
6.15. Infrastructure enabling low-carbon road transport and public transport	MAC 6.15	104 893	4%	EL		N/EL	EL	N/EL	N/EL								3%		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2.)		104 893	4%																
Total (A.1+A.2.)		104 893	4%																
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
OpEx of Taxonomy-non-eligible activities (B)		2 561 850	96%																
Total (A+B)		2 666 746	100%																

## **CAPITAL EXPENDITURES (CAPEX)**

An assessment was done of the NOVABASE Group's economic activities, which concluded that those eligible for Taxonomy for the Group are the following:

- MAC 6.5. Transport by motorbikes, passenger cars and light commercial vehicles: Purchase, financing, renting, leasing and operation of vehicles designated as category M1, N1, both falling under the scope of Regulation (EC) No. 715/2007 of the European Parliament and of the Council, or L (2- and 3-wheel vehicles and quadricycles) (NACE codes: H.49.32, H.49.39 and N.77.11);
- MAC 7.4. Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings): Installation, maintenance and repair of charging stations for electric vehicles in buildings and parking spaces attached to buildings (NACE codes: F.42, F.43, M.71, C.16, C.17, C.22, C.23, C.25, C.27 or C.28).

The value used to calculate the numerator corresponds to the amount invested by the Group in electric and hybrid vehicles during the years under analysis (2022 and 2023). No new vehicle charging stations were installed in either 2022 or 2023, so the figures associated with activity 7.4 described above are not taken into account. The denominator considered was the Group's total gross investment in 2023 (and the same period of the previous year), as presented in Note 7, "Property, Plant and Equipment", and Note 8, "Intangible Assets", removing the amount relating to Right-of-Use Assets relating to the building, in the Annual Report 2023, Consolidated Financial Statements.

CapEx: Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities - Template of Annex II to Commission Delegated Regulation (EU) 2021/2178

CAPEX	2023			Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")						Taxonomy-aligned proportions of turnover, 2022	Category (enabling activity)	Category (transitional category)		
	Code	CapEx	Proportion of turnover	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems				Minimum safeguards	
		(€)	%	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T	
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																				
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																				
6.5. Transport by motorbikes, passenger cars and light commercial vehicles	MAC 6.5	1 789 595	50%	Y	Y	N/EL	Y	N/EL	N/EL		Y	N/A	Y	Y	N/A	Y				
<b>CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1.)</b>		1 789 595	50%	Y	Y	N/EL	Y	N/EL	N/EL											
Of which enabling																				
Of which, transitional																				
<b>A.2. Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>			0%																	
			0%																	
<b>CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2.)</b>																				
Total (A.1.+A.2.)		1 789 595	50%														19%			
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																				
<b>CapEx of Taxonomy-non-eligible activities (B)</b>		1 790 139	50%														81%			
Total (A+B)		3 579 733																		