

NON-FINANCIAL STATEMENTS

PART I - INFORMATION REGARDING ADOPTED POLICIES

A. INTRODUCTION | NOVABASE GROUP

Under Article 508-G of the Commercial Companies Code, in accordance with the wording introduced via Decree-Law no. 89/2017 of 28 July, which transposed to Portuguese rule of law Directive 2014/95/EU of the European Parliament and of the Council of 22 October 2014, NOVABASE has outlined in the present document sufficient information for comprehending the evolution, performance, position and impact of the group's activities, at the very least in reference to environmental and social issues, its employees, gender equality, non-discrimination, respect for human rights, preventing corruption and attempted bribery in relation to NOVABASE Group during the financial year ended 31 December 2020.

Information pertaining to NOVABASE Group activity and corporate organization may be consulted in the Annual Report and Accounts 2020 (Notes to the Consolidated Financial Statements for the year ended 31 December 2020), along with the Corporate Governance Report for the financial year 2020 (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)" of the Corporate Governance Report for the 2020 financial year.

C. MAIN RISK FACTORS

NOVABASE Group is subject to regular market risks and the specific underlying risks of the activities it undertakes. NOVABASE believes that its risk management policy is absolutely essential to running and developing a business that has historically been known for its greater appetite for risk, an intrinsic necessity in such a dynamic and disruptive sector.

NOVABASE also implements procedures and internal control systems used to prevent and manage risk related to its organization and activities.

Additional information regarding internal control and risk management at NOVABASE is available in Part I, Letter C., Section III. "Internal Control and Risk Management" in the Corporate Governance Report for the 2020 financial year.

D. IMPLEMENTED POLICIES

i. Environmental

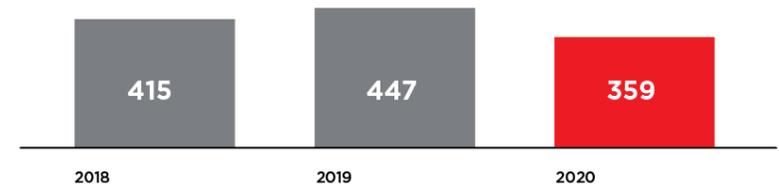
NOVABASE has implemented an Environmental Management System (ISO 14001) that is part of its Integrated Management System (Quality, Environment, Occupational Health and Safety). The IMS is governed by a policy that is aligned with the vision and values of NOVABASE, as well as being in tune with its stakeholders' needs. Internal and external audits are conducted annually -- the external conducted by certifier entities. Similar to 2019, no non-conformities were identified in 2020.

NOVABASE has established a policy through which environmental and safety requirements pertaining to the acquisition/supply of goods and services are identified.

NOVABASE monitors a group of indicators: consumption of electricity, thermal energy, water, diesel and gasoline; recycling of plastic, cardboard, paper, glass; and greenhouse gas emissions.

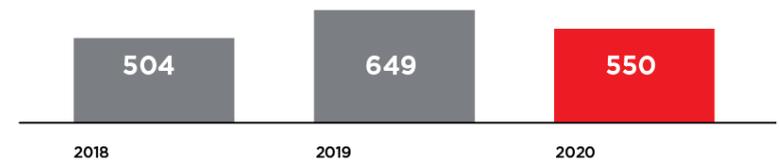
Against the backdrop of the pandemic, we highlight the following indicators for 2020:

ELECTRICITY CONSUMPTION MW/H



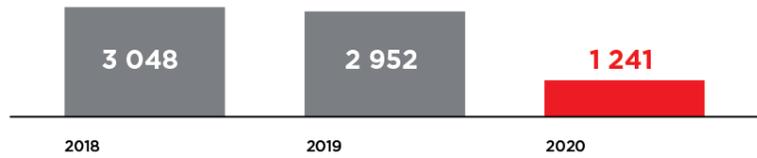
Implemented measures: existence of a Centralized Management System that controls operating periods, and replacement of all fluorescent lighting with LED lighting.

THERMAL ENERGY CONSUMPTION IN MW



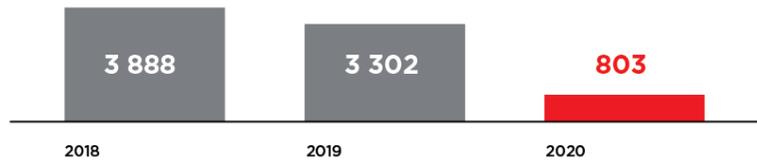
Implemented measures: existence of a Centralized Management System that controls the operating periods of the climate control system.

WATER CONSUMPTION M³



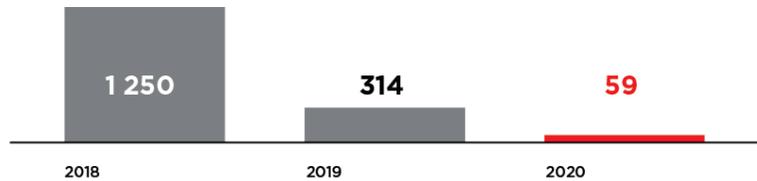
Implemented measures: reduction of available water flow and installation of flow reducers in faucets.

TOTAL PAPER CONSUMPTION IN KG



Implemented measures: create awareness regarding paper use.

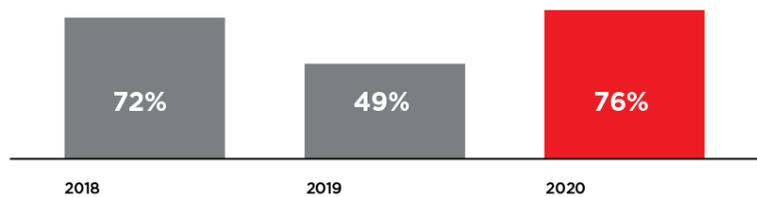
PLASTIC PRODUCTION IN KG



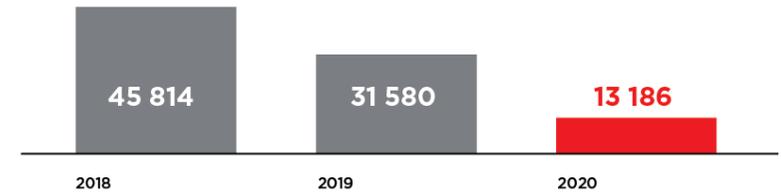
Implemented measures: replacement of single-use plastic with reusable materials (glass).

The recycling rate improved significantly and the amount of waste also fell.

RECYCLING RATE

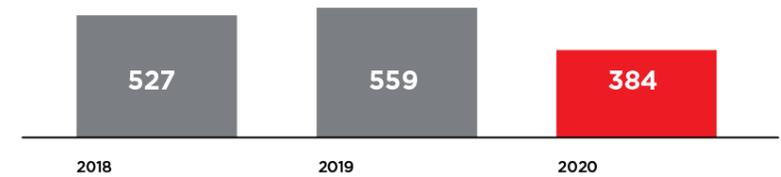


AMOUNT OF WASTE IN KG



Emissions:

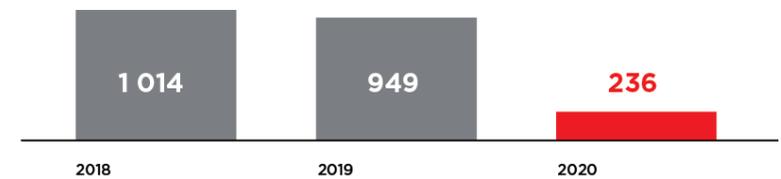
EMISSIONS T/CO₂ FLEET



NOVABASE has integrated vehicles into its fleet that pollute less, as indicated in the table below:

TYPE OF VEHICLE	2018	2019	2020
Hybrid	1	0	0
Hybrid Plug-In	9	19	21
Electric	2	4	3

EMISSIONS T/CO₂ AIR TRAVEL



EMISSIONS T/CO₂ FUEL, AIR TRAVEL AND BUILDINGS



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

In 2020, NOVABASE joined the reforestation campaign known as Uma Árvore pela Floresta (A Tree for the Forest) organized by Quercus/CTT. The funds gathered through the recycling of toners and print cartridges were used to acquire tree and/or native brush kits for planting in springtime in protected areas or those areas affected by fire.

ii. Social and Fiscal

NOVABASE has implemented a series of measures aimed at establishing a balance between its employees' professional, family and personal life. Among these measures we highlight the following: osteopathy consultations; acupuncture and Tui Na; blood pressure and blood sugar monitoring; massage therapy; quick massage; Health Week and healthy breakfast. However, due to the pandemic, these measures were suspended and more emphasis was put on mental health consultations in view of helping everyone who needs such services, always ensuring the privacy of each individual. Reflective of NOVABASE's concern for its employees' mental health, it created the webinar "What are you feeling?".

Also in relation to the pandemic, in 2020, 101 refurbished computers were sold to help remote schooling activities for the children of NOVABASE Group employees.

NOVABASE also took part in social solidarity initiatives in which we highlight the following:

- Celfocus
"Student Keep" initiative - below, the bulletin that was released at the time:

"Celfocus is a proud sponsor of Student Keep"

Celfocus looked for ways to minimize the impact of COVID-19 by creating Out of the Pandemic a community built from scratch by a group of people eager to help those in need. After weeks of interactions and field research, the community voted to support remote teaching challenges and partner with a trusted project that has built a working and multidisciplinary structure.

Student Keep is a project under the #tech4COVID19 movement that works to fight inequality in access to education by identifying keepers that will donate materials (computers, tablets, internet, mouse, keyboard) to students without access to them and by gathering volunteers, who will perform the necessary technical interventions in such equipment.

How Celfocus helped?

- Rolling up our sleeves
Several colleagues have signed up to support the project in technical interventions (computer formatting, installations etc.). This help will speed up access to equipment for those in need.

- Giving unused equipment another life
Simultaneously, colleagues have used the project's website to register their unused equipment to be distributed to those in need.

Celfocus will also be supporting Student Keep by funding the purchase of additional equipment for as many students as possible. Learn more about this project and be a supporter - <https://www.studentkeep.org/>

- NeoTalent
Contribution to the food bank.

Delivery of laptops to families in need during the first pandemic lockdown period. <https://www.linkedin.com/feed/update/urn:li:activity:6688804937125703680>

iii. Employees and Gender Equality and Non-Discrimination

Cabinet Resolution no. 19/2012 of 8 March 2012 determined that it would be mandatory to adopt an equality plan for all state corporate sector entities, in view of achieving equal treatment and equal opportunity between men and women, eliminating discrimination and facilitating reconciliation of personal, family and professional life.

This obligation was extended to all companies listed on stock exchanges via Law no. 62/2017 of 1 August, which approves the framework for balanced representation of men and women in executive and supervisory bodies of the public corporate sector and companies listed on stock exchanges, Article 7 stipulating the obligation to draft annual equality plans "that move towards effective equality of treatment and opportunities between men and women, promoting the elimination of discrimination on the basis of gender and fostering a reconciliation between personal, family and professional life".

As such, on 25 November 2020 NOVABASE delivered a new version of its plan for gender equality and diversity, in which it defined its measures and practices to be developed for 2020/2021, among which we highlight those that have already been implemented:

- Joined Fórum iGen (Forum of Organizations for Equality);
- The book O Longo Caminho Para a Igualdade - Mulheres e Homens No Século XXI (The Long Path to Equality - Women and Men in the 21st Century) was given to all of our employees;
- Revision of the code of conduct using inclusive language.

The key indicator is the proportion of men and women among the total number of employees, which should trend toward equality. In 2020 this indicator stood at 68% men and 32% women, slightly different from the 2019 result in which the proportion was 69% men and 31% women, which is in line with the information technologies industry trend in Portugal and abroad, and reflects the predilection for university courses in these areas for each gender.

At NOVABASE we believe in equal opportunity and mutual respect, regardless

of ethnicity, gender, religion, ideology, social background or sexual orientation. These differences tend to improve the quality of the decision-making processes through a multiplicity of perspectives, greater intellectual and cultural richness and greater representation of reality and the stakeholders.

This is why we also believe that the diversity of our governing bodies contributes to better performance and greater competitiveness on the part of NOVABASE. Thus, we are committed to promoting the following policy:

- Compliance with Law no. 62/2017 of 1 August, since gender diversity leads to different management styles and complementary approaches;
- With regard to age, there must be a balance between experience and maturity on the one hand, and youth and energy on the other hand, the latter being so essential to the fast-paced innovation of our highly dynamic sector (information technologies);
- Regarding 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 implements own principles specifically related to (i) respect for human rights (ii) collective bargaining and (iii) ensuring the absence of child labour or forced/obligatory labour. It has a Code of Conduct that lays out these principles, which was revised and approved by the Board of Directors over the course of 2020. The Code establishes the principles and rules that govern relations between NOVABASE and its stakeholders in their broadest form. They represent a commitment to NOVABASE clients and partners, but also a commitment by employees and to employees with respect to the manner in which they relate to the company and to each other. It covers topics that include integrity, transparency, respect, safety and health, information use, intellectual property, use of resources, social and environmental responsibility, not to mention management of conflicts of interest, corruption and bribery, in addition to including several aspects such as legal compliance, good environmental and labour practices and human rights, and application of these principles when hiring third parties. The Code of Conduct is available in the institutional area of the website and via intranet. Our ethical concerns extend to our suppliers and partners. The principles and rules described in the NOVABASE Code of Conduct must be strictly adhered to by each partner or supplier who works with NOVABASE and must be incorporated into their daily processes. NOVABASE includes in its contracts with suppliers a commitment to adhering to the NOVABASE Code of Conduct.

v. Fight against Corruption and Bribery Attempts

NOVABASE has adopted a system for reporting irregularities (known as "SPI") that occur within its Group. The reporting of irregularities through SPI is forwarded to one of the members of the Audit Board specially appointed for this purpose. Additional information regarding the reporting of irregularities via the NOVABASE SPI may be consulted in Part I, Letter B., Section II. "REPORTING OF IRREGULARITIES" of the Corporate Governance Report for the 2020 financial year.

PART II - INFORMATION REGARDING STANDARDS / DIRECTIVES

Given the size of the NOVABASE Group, the nature of its activities, its business model and the industries in which the Group operates, no formal policies were approved regarding all the aspects listed in number 2 of Article 508-G of the Commercial Companies Code.

Nevertheless, NOVABASE Group is governed in the various areas of its activity by applicable legislation and regulations, and relevant recommendations from the Portuguese Securities Market Commission and other national and international entities.

NOVABASE Group has also internally adopted certain reference documents, diligence systems and processes regarding practices to adopt in certain areas, taking into consideration the Group and its needs, along with its employees, professionals and other stakeholders, with the underlying aim of ensuring sustainable growth. NOVABASE Group companies are also subject to various types of internal and external audits.

As such, below we list the main aspects, documents, practices and processes implemented by NOVABASE Group and that it believes have a non-financial impact on the Group, namely in terms of the environment, society, labour, gender equality and non-discrimination, human rights, and combating corruption:

- NOVABASE activity and the conduct of its employees and professionals is governed by legislation applicable in relevant jurisdictions and by the NOVABASE Code of Conduct (published on the corporate website), an internally approved document that has been implemented by the Group since 2011 with the aim of offering guidelines for NOVABASE professionals in accordance with the Group's values, not only in terms of its relationships with clients, but also in terms of its internal relations;
- The company's activity is managed in accordance with the Integrated Management System (Quality, Environment, Occupational Health and Safety);
- NOVABASE companies are audited by its financial auditors and its certifications pertaining to Quality (ISO 9001), Environmental Management (ISO 14001) and Occupational Health and Safety (ISO 45001) are renewed annually following internal and external audits, the latter conducted by certifying authorities;
- The company regularly monitors customer satisfaction and the satisfaction of its employees and professionals with respect to internal services and other matters of interest to its management;
- In accordance with the recommendations of the Instituto Português de Corporate Governance (Portuguese Corporate Governance Institute) regarding the governance of publicly 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 the Group. Reporting of irregularities via SPI is forwarded to one of the members of the Audit Board specially appointed for that purpose. Additional information regarding the reporting of irregularities via the NOVABASE SPI may be consulted in Part I, Letter B., Section II. "REPORTING OF IRREGULARITIES"

of the Corporate Governance Report for the 2020 financial year;

- The company also implements "Internal Regulations on Business Dealings with Owners of Qualified Holdings in NOVABASE S.G.P.S., S.A.".