

NOVABASE

GENDER EQUALITY, INCLUSION AND DIVERSITY PLAN

2025|2026

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Managing diversity, equality and inclusion is essential for all of our businesses. We believe our people are more productive when they are treated with respect and dignity, when they feel engaged and proud of their contribution towards helping the company grow, when they feel reflected in corporate policies, and when their skills are leveraged so that they develop in a working environment whose doors are open to diversity, equality and inclusion.

Background

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 business continuity (ISO 22301), quality (ISO 9001), environmental management (ISO 14001), occupational health and safety (ISO 45001), and information security management system (ISO 27001 and ISO 27701) 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 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 (for a detail of the system, please see (<https://content.novabase.com/storage/uploads/comunicacao-de-irregularidades-2025.pdf>))
- The company also has “Internal Regulations on Transactions with Related to Parties of Novabase, SGPS, S.A.” 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 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”;
- Law no. 62/2017, which 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;
- 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 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.

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 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 review it whenever deemed appropriate.

Diagnostics

To properly gauge the present needs in relation to gender equality, various internal and external information sources were considered, namely:

- Diagnostic index, available at the Portal, for Equality at Work and Companies (<https://planosigualdade.cite.gov.pt/>)..
- Guide for preparing equality plans, published by the Commission for Equality in Labour and Employment (CITE).
- Analytics of Human Resources who monitor the how strategies and action plans are laid out each year.
- Recommendations from the CITE technical analysis in November 2023.

Strategy, Mission and Values

Diversity, equality and inclusion are inherent underlying values in Novabase's organizational culture. They allow us to attract, develop, motivate and retain the best talent. They help us to be more innovative when developing products and solutions for our customers. They help us expand the business into new regions, embracing and incorporating new cultures and customs. They nurture the growth and ongoing success of our business.

At Novabase, we promote a culture where all people have a proactive "voice" within the organization. We focus on transparent communication in our processes and procedures, promoting equal opportunities in an organization which is increasingly more multi-generational and multi-cultural.

The values of diversity, equality and inclusion are a prerequisite for the sustainability of Novabase's long-term business strategy. As such, Novabase is committed to constantly encouraging and promoting equality between our people, and accepting each person's individuality as a competitive advantage.

This commitment is reflected in our Code of Conduct, in the Gender Equality and Diversity Plan, in measures for identifying and acting in cases of bullying, in the hybrid work policy, disseminated and available for consultation by our people at the company's different communication channels, with a focus on issues involving equality between men and women, the reconciliation of professional, personal and family life and parental protection.

Results and Indicators

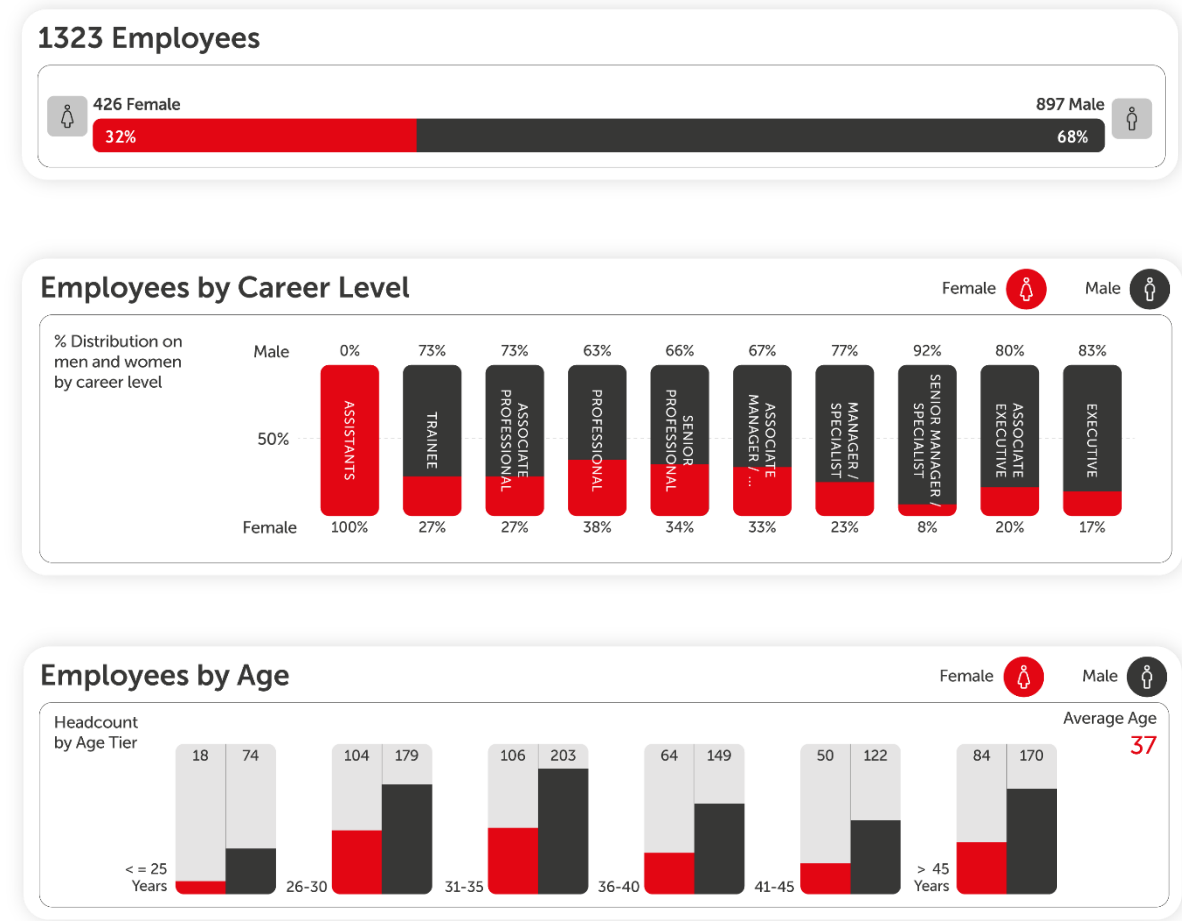
Since no matters involving human rights, corruption or attempted bribery were reported in 2024/25 to the management Novabase SGPS, S.A. through the available channels for this purpose, there are no indicators to report in this regard.

As regards gender equality, we remain committed at the Novabase Group to act according to the principles of equal treatment and equal opportunities between men and women.

We pay attention to indicators to monitor trends at our organization involving the proportion of men and women vis-à-vis all employees, career advancement and respective compensation.

Organizational profile

The IT sector continues to be predominantly male. At the Novabase, this indicator has remained stable in recent years. In 2025, the distribution of men and women has been 68% and 32%, respectively.

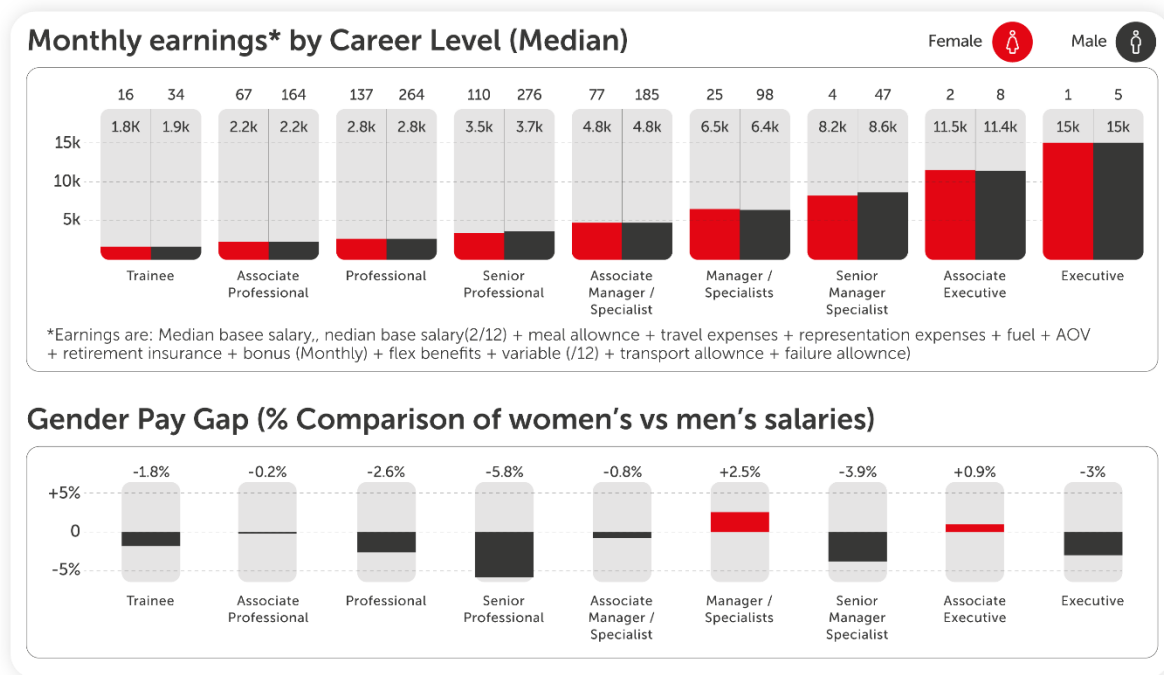


Graph 1: % women/men by career level proportional to the number of women/men at the company (including all individuals with an employment relationship)

REMUNERATION BETWEEN MEN AND WOMEN

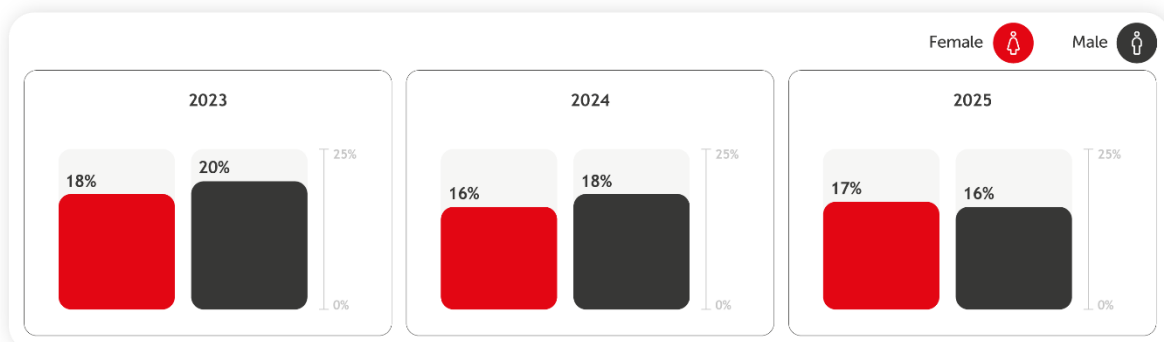
In terms of compensation practices, the Novabase Group actively promotes a culture of equity, both at the time of hiring (with comparative market studies) and internally (using tools for performance evaluation and recognition, where individual and collective contributions are differentiating factors).

Regarding salary compensation, the gaps found do not reveal gender discrimination. It's also important to note that for a more detailed analysis, factors such as role, seniority, and experience should be considered.



Graph 2: Remuneration by Career Level*

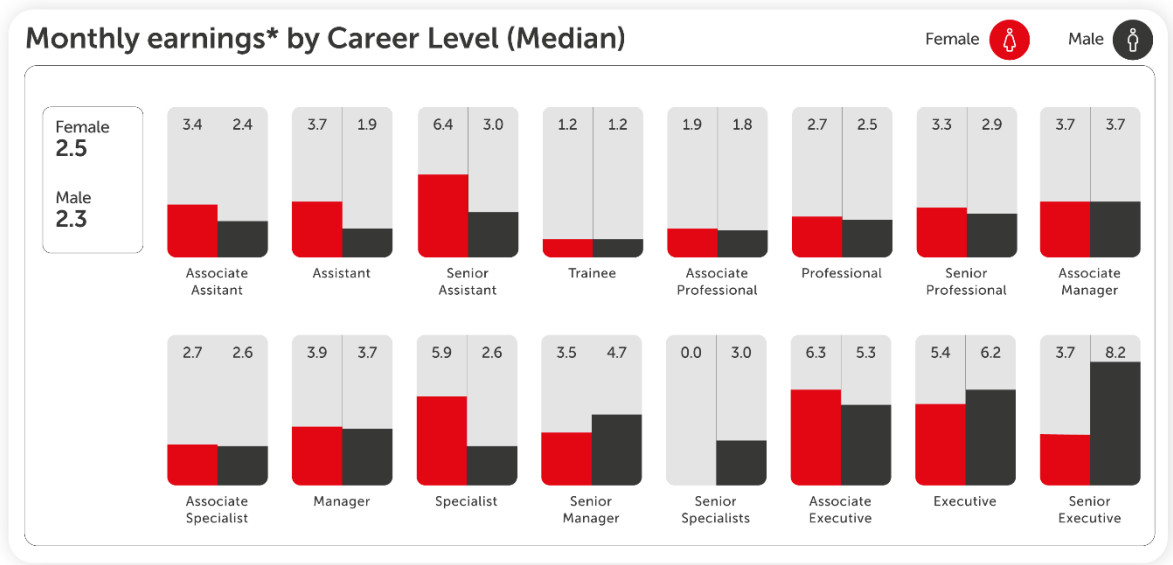
€ (Monthly remuneration received by women and men - median)
 % (Percent difference in relation to the highest median)



Graph 3: % promotions proportional to the total number of women versus men

An analysis of promotions from 2023 to 2025 reveals a relatively even distribution between genders, with residual variations from year to year. We can thus conclude that there is no clear pattern of systematically favouring one gender.

Overall, there are no major structural differences between genders in the average time per career level. There are, however, variations in management levels: women stay longer as Specialists, while men tend to stay slightly longer as Senior Managers/Specialists. This association may explain the wage gap between men and women at the same career levels.



Graph 4: average time in each career level for women/men

We remain committed to ensuring that salary increase decisions are based solely on job descriptions, responsibilities, experience, and performance, progressively correcting any disparities resulting from lateral career moves, prolonged absences, or other situations.

To this end, the Novabase group has internal processes and tools that proactively promote equity in hiring, salary reviews, and promotions. Valuing professional experience, technical and behavioral skills, performance, and potential are factors that are cross-functional and understood by our employees. We foster a culture of transparency regarding internal mobility and career advancement opportunities.

Measures and practices to be implemented, and their monitoring

At Novabase, creating an increasingly more inclusive culture continues to be one of our main goals, and we have attempted to take firm steps in this direction. Defining and achieving an Annual Equality Plan is a reflection of our commitment and 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.

A number of different people with diverse roles at the organization take part in defining, approving and monitoring this plan. (table 1).

We now present a summary of the measures and practices implemented in the past year, from September 2024 to September 2025 (table 2), along with the measures and initiatives planned for September 2025 to September 2026, in the various aspects of the plan (table 3).

Building a 2025/2026 Equality Plan is based on the diagnostic performed, with the help of a support matrix provided by CITE – Self-assessment Guide on Gender Equality in Companies. This diagnostic was carried out by a diverse multidisciplinary team with members from the Human Resources, Legal and Business Departments.

The Plan for 2025/2026 was prepared based on the observance of CITE recommendations on the Novabase Equality Plan (recommendation no. 37/cite/2023). Therefore, our Plan for 2025/2026 reflects targets for the measures proposed and results evaluation indicators.

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 total number of people, are priorities for Novabase; as such, we continue to promote various initiatives aimed at pursuing this goal, despite the particular challenges of the job market in which we operate.

Compliance with these initiatives will be monitored and assessed based on a bimonthly follow-up meeting with those in charge of implementing each measure (Table 1). 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.

The findings presented and gaps encountered are analysed and discussed by the Committee and the equality and diversity team in order to determine measures to be implemented in the next cycle to gradually eliminate gaps and promote gender equality from all standpoints.

2025/2026 Governance Model for Equality

Table 1

Departments/Units Involved		Goals	Frequency	Status
Gender Equality, Diversity and Inclusion Committee	Novabase Chairman	• Ensure and monitor implementation of gender equality, diversity and inclusion measures • Promote discussion on gender equality, diversity and inclusion trends and practices • Lay groundwork for implementing the plan • Play a role of sponsor, ensuring strategic alignment and institutional support for initiatives	Quarterly monitoring meetings and respective meeting minutes.	According to plan
	Celfocus CEO Managing Director Human Resources Department (DRH) Legal Department Investor Relations Coordinator of team for gender equality and diversity (member appointed by DRH)			
Gender equality, diversity and inclusion team	Multidisciplinary team with representatives from different organizational areas, with different career levels and with knowledge of, or actively involved in, topics involving diversity, equality and inclusion (e.g. LGBT community, associations for disabled persons, associations for women's empowerment)	Define an action plan by analysing different aspects of gender equality and diversity, including: • Equity in Access to Education and Professional Training • Diversity and Representation • Inclusion of Under-represented Groups • Inclusive Recruitment and Development • Awareness-raising, Education and Organizational Culture • Professional/Personal Life Balance and Well-Being • Impact Assessment and Monitoring	Bimonthly meetings to monitor the activity plan in place, and its respective implementation	According to plan
Gender Equality, Diversity and Inclusion Plan	Gender equality, diversity and inclusion team Managers of approved initiatives and respective working teams	See description of initiatives in table 2.	In accordance with action plan	See table 2.

Table 1. Corporate governance model of 2025/2026 Equality Plan.

Measures implemented in 2024/2025

Table 2

Aspect: Strategy, mission and values							
Goals	Measures	Departments/Units in charge	Departments/Units involved	Financial investment	Results evaluation indicators	Target	Results
1. Evaluate diversity at Novabase/Celfocus and perceptions on diversity and inclusion in the work experience, together with the degree of recognition of D&I policies and measures, identifying the main challenges, possibilities and future directions	1.1 Analysis of data collected from D&I Survey	People & Communication, APPDI	People & Communication	6 000€	% survey response rate	30%	Achieved – 40%
	1.2 Focus groups for feedback and more in-depth reflection on key D&I topics	People & Communication, APPDI	People & Communication		Done (yes/no)	yes	Yes
	1.3 Production and presentation of the Findings Report from the survey and focus group	People & Communication APPDI	People & Communication		Presentation to D& committee (yes/no)	yes	Yes
					Publication and dissemination of results via intranet (Yes/No)	yes	Yes
2. Give support and visibility to corporate movements for inclusion (gender equality, diversity, non-discrimination and others)	2.1 Participation in programs and initiatives with external entities, such as the mentoring program PWIT – Portuguese Women in Tech and the Professional Women's Network	People & Communication	Corporate Development	3 000 €	Number of PWIT mentors	3 Mentor	5 Mentors – Achieved
					Number of PWN memberships	13 people	9 people – not Achieved

Aspect: Strategy, mission and values							
Goals	Measures	Departments/Units in charge	Departments/Units involved	Financial investment	Results evaluation indicators	Target	Results
	2.2 Participation in the Technovation Girls program: Mentoring of teams of young female students in the development of social sustainability projects, to attract more female students to STEM (Science, Technology Engineering & Mathematics) areas Support for the technology training of participating students, through a partnership with the Happy Code programming school	People & Communication	Novabase/Celfocus ALL	1 500 €	Number of Technovation teams supported by Novabase/ Celfocus	10 teams	1 external team and 6 internal teams - not Achieved
	Number of Novabase/ Celfocus teams				3 teams	6 teams - Achieved	
	NOVABASE/Celfocus representation in national Technovation Girls event				yes	no	
	Number of technology training classes				1 class	6 classes - Achieved	
	2.3 Evaluate Novabase/Celfocus' participation in the APPDI program "Women Engineers for One Day"	People & Communication	Business units	No specific costs	Participation decision	Analysis and discussion	We prioritized the implementation of other initiatives with yesilar objectives
3. Internal and external communication and awareness activities	3.1 Initiatives for sharing information and/or discussion forums on inclusive work and mental health practices	People & Communication	People & Communication	2 000 €	Mental health webinar	Q4 2024	yes no
	3.2 Celebration of days with symbolic meaning in the context of diversity	People & Communication	People & Communication	No specific costs	Public statement on supporting non-discrimination with the LGBTI+ community (Yes/No)	yes	Because it is a delicate topic that required a more in depth impact analysis, it was decided to postpone it

Aspect: Strategy, mission and values

Goals	Measures	Departments/Units in charge	Departments/Units involved	Financial investment	Results evaluation indicators	Target	Results
	3.3 Publications for the purpose of contributing towards community awareness and information on gender equality	People & Communication	People & Communication	No specific costs	Number of publications/media presence	yes	3 articles

Aspect: Equal access to employment

Goals	Measures	Departments/Units in charge	Departments/Units involved	Financial investment	Results evaluation indicators	Target	Results
4. Training of interviewers from business areas on skill-assessment interview practices and techniques to ensure objectivity, impartiality and equal opportunities for all people during the selection process	4.1 Creation of an Interview Techniques course and training sessions for the first group of 10 people (Performing Engaging Interviews pilot)	People & Communication	People & Communication Business Units	No specific costs	Participation rate among all interviewers (number of participants/number of interviewers)	70%	20 not achieved
					NPS of the course	55	90 - achieved
5. Inclusion of people with a degree of disability of 60% or more in the workforce	5.1 Creation of an e-learning course on the integration of people with specific needs	People & Communication	People & Communication	No specific costs	Done (yes/ no)	yes	not implemented
					Participation rate (number of people who completed the training/Novabase/Celfocus headcount)	20%	The initiative was not implemented, it is scheduled for implementation in the next plan.
	5.2 Ongoing partnerships with Valor T, Salvador Association, Eurofirms and IEFP	People & Communication	People & Communication	No specific costs	NPS of the course Number of announcements at IEFP platform	60 TBD	not applicable Not defined

Aspect: Equal access to employment

Goals	Measures	Departments/Units in charge	Departments/Units involved	Financial investment	Results evaluation indicators	Target	Results
			Business Units		Number of candidatos/as com grau de deficiência igual ou superior a 60% incluídos nos processos de seleção	25	7 - not achieved The significant reduction in the volume of hiring in 2025 conditioned the development of the planned initiatives.
	5.3 Custom interviews tailored to the specific needs of people with disabilities	People & Communication	People & Communication	No specific costs	Supervision of all interviews by a dedicated person to ensure the proper adaptation of interviews	100% of interviews done	yes
	5.4 Sponsorship de 1 Bolsa Code for ALL para uma pessoa com deficiência igual ou superior a 60% com mentorship Novabase/ Celfocus	People & Communication	Talent Acquisition	No specific costs	Completion of Code for ALL program (Yes/No)	Completed	yes

Aspect: Initial and ongoing training

Goals	Measures	Departments/Units in charge	Departments/Units involved	Financial investment	Results evaluation indicators	Target	Results
6.Increase the level of awareness on unconscious biases that lead to prejudice and micro-aggression, together with the adoption of inclusive practices among teams	6.1 Creation of an e-learning component of the "Unconscious Bias" course, and inclusion in the Celfocus "Plugin" onboarding training program	People & Communication	Business Units	No specific costs allocated	e-learning creation (yes / no)	yes	yes
					Participation rate (number of people who completed the training/Novabase/Celfocus headcount)	30%	not implemented (the course didn't go live yet, it is scheduled for next plan.)

Aspect: Initial and ongoing training							
Goals	Measures	Departments/Units in charge	Departments/Units involved	Financial investment	Results evaluation indicators	Target	Results
					NPS of the course	60	not applicable
7. Higher level of awareness on cultural diversity and collaborative practices in the Novabase/Celfocus culture	7.1 Extension of the Cultural Awareness at Middle East training (e-learning course)	People & Communication	Business Units	No specific costs	Participation rate	30%	7% - not achieved
					(number of people who completed the training/Novabase/Celfocus headcount)		The reorganization at the beginning of the year conditioned the availability for training initiatives globally.
					NPS of the course	60	88 - achieved
	7.2 Creation of Cultural Awareness at Portugal training to accelerate the inclusion of people belonging to Novabase/Celfocus with different cultural matrices	People & Communication	Business Units	No specific costs	e-learning creation (yes / no)	yes	yes
					NPS of the course	50	84 - achieved

Aspect: Equal working conditions							
Goals	Measures	Departments/Units in charge	Departments/Units involved	Financial investment	Results evaluation indicators	Target	Results
8. Collect feedback from our people on a series of key issues to enhance their experience working at the organization	8.1 Launch of the People Survey to determine the e-NPS, motivation and satisfaction on issues impacting the work experience of people from Novabase/Celfocus	People & Communication	People & Communication	No specific costs	e-NPS	>25	20
			Business Units				not achieved

Aspect: Equal working conditions							
Goals	Measures	Departments/Units in charge	Departments/Units involved	Financial investment	Results evaluation indicators	Target	Results
9. Promote gender equality in compensation and benefits	9.1 Continuous analysis of differences found between men and women with regard to benefits received by career level by integrating this information in People Analytics	People & Communication	People & Communication	No specific costs	Development of a Diversity and Inclusion dashboard to continuously monitor gender equality, including in terms of compensation and benefits (Yes/No)	yes	yes

Aspect: Reconciliation of professional life with family and personal life							
Goals	Measures	Departments/Units in charge	Departments/Units involved	Financial investment	Results evaluation indicators	Target	Results
10. Assist fathers and mothers during parental leave and when returning to work	10.1 Creation of monitoring and return to work program	People & Communication	People & Communication Business Units	No specific costs	Creation of the program and assessment of the degree of participation to establish a baseline (Yes/No)	yes	no (the program has been rescheduled and is scheduled to be carried out in the next cycle/plan)
11. Train people responsible for managing teams to promote work organization practices that encourage health, well-being, a balance	11.1 Extension of the "Personal Balance" course for people responsible for managing and leading teams	People & Communication	People & Communication Business Units	2 000 €	Number of course editions held Completion rate (number of people who completed the training/number of people invited) NPS of the course	3 editions 90% 60	10 editions - achieved 54% - not achieved 96 - achieved

Table 2. Measures and actions planned for September 2024 to September 2025

Measures planned for September 2025 to September 2026

Table 3

Aspect: Diversity and Representation					
Goal	Measures	Departments in Charge	Financial Investment	Evaluation Indicators	Timeframe
Promote awareness and celebration of workplace diversity and inclusion.	Initiative to spotlight Coming Out Day (11 October), promoting safe spaces and visibility for LGBTQIA+ people through sharing and educational content. Celebrating this date at an organization like Novabase/Celfocus reinforces its commitment to creating inclusive environments where everyone feels respected, represented and psychologically safe to be who they are. This type of initiative contributes towards collective awareness and a more open, diverse and welcoming work culture. Activities • Inclusive Talk event focusing on the following topics: Inclusive and Welcoming Environment, Workplace Impact and Mental Health. • Promotion of the event with company and/or guest speakers and space for sharing and questions. • Social media posts (Instagram and LinkedIn) to mark the event	D&I Team, Communication	No specific costs	• Organization of the event Inclusive Talk to celebrate Coming Out Day; • More than 100 participants; • NPS above 50.	Q4 2025 (13-17 October)

Aspect: Equity in Access to Education and Professional Training

Goal	Measures	Departments in Charge	Financial Investment	Evaluation Indicators	Timeframe
Promote girls' access to technological and scientific skills.	Global program that empowers girls to develop technology solutions for social problems, promoting digital skills and female leadership. By including girls from underprivileged backgrounds, the program creates opportunities to network with STEM areas to help broaden horizons, promote equal opportunities and enrich these young women's future prospects. Activities: • Identification and selection of girls from underprivileged backgrounds in partnership with social institutions • Training sessions in digital skills and programming • Mentoring and accompanying teams during the development of technology solutions • Promoting the visibility of results and impact with the community and stakeholders through public articles on social networks • In-house closing event • Social media posts about the initiative, reinforcing Novabase/Celfocus' commitment to diversity and inclusion.	D&I Team, Communication	€2750	• 20 spots distributed equally between girls who are family members of Novabase/Celfocus employees and girls from underprivileged backgrounds, in partnership with social institutions • Completion rate of over 85%, reflecting the strong engagement and commitment of participants; • Positive NPS from the participants' caregivers/guardians, showing that they valued the experience and impact of the program;	All year

Aspect: Equity in Access to Education and Professional Training

Goal	Measures	Departments in Charge	Financial Investment	Evaluation Indicators	Timeframe
Boost the presence and leadership of women in the technology and digital sector.	Mentoring program and events for women in leadership positions, focused on building new skills and sharing experiences. Activities: • Participation in mentoring program and complementary events. • Internal and external publications on the initiative. • Quarterly monitoring and knowledge-sharing meetings.	D&I Team, Business, Communication	€1500	• 12 licences > Professional Career level • Survey with NPS>50	Q4 2025
Boost the presence and leadership of women in the technology and digital sector.	Four-month mentoring program in which Novabase/Celfocus women in leadership positions mentor other women from outside the organization Activities: • Participation in mentoring program. • Internal and external publications on the initiative.	D&I Team, Business, Communication	€1500	• 5 in-house mentors • Survey with NPS>50	Q2 2026
Facilitate access to the job market for people who are disabled or in vulnerable situations.	Initiative for developing joint training in the IT area, promoted by technology companies committed to inclusion. The goal is to leverage these organizations' expertise to empower people with disabilities, strengthening their skills and creating more job market opportunities. Activities: • Definition of IT training resources for classes made up of people who are disabled or in vulnerable situations. • Assessment of training needs. • Identification of talent who will benefit from this program. • Hiring of people under the program.	D&I Team, Recruitment Team, Training Team, Business	No specific costs	• Hiring of two people who are beneficiaries of the program	Q1 2026

Aspect: Equity in Access to Education and Professional Training

Goal	Measures	Departments in Charge	Financial Investment	Evaluation Indicators	Timeframe
Promote equal opportunities in accessing education and developing young talent.	Support for young people in situations of socio-economic vulnerability through scholarships promoted by the Entrepreneurs for Social Inclusion (EPIS) Association. Activities: • Award of a scholarship to economically underprivileged female high school students. • Award of a scholarship to economically underprivileged female university students. • Other contributions in the area of social responsibility, namely through volunteer work. • Social network posts about the initiative	D&I Team, Communication	€5100	• Award of two EPIS scholarships	All year

Aspect: Professional/Personal Life Balance and Well-Being

Goal	Measures	Departments in Charge	Financial Investment	Evaluation Indicators	Timeframe
Encourage a personal/professional life balance, with a focus on parenting.	Parental program to support employees returning to work after parental leave, with measures to facilitate reintegration into teams and promote a personal/professional life balance. Activities: • Implementation of support measures for returning to work after parental leave. • Drawing up a proposal with specific actions for reintegrating employees into teams. • Individual follow-up in the process of returning to work. • Promotion of best reconciliation practices among leaders and teams.	Communication, Business	No specific costs	• Creation and implementation of an action plan with specific measures. • Achievement of an NPS > 50. • Focus group to assess the perception of the program's impact.	Q2 2026

Aspect: Inclusion of Under-represented Groups

Goal	Measures	Departments in Charge	Financial Investment	Evaluation Indicators	Timeframe
Facilitate access to the job market for people who are disabled or in vulnerable situations.	Aims to strengthen proximity and deepen the relationship between Novabase/Celfocus and organizations that promote and support inclusive recruitment, keeping the company on the radar of people with disabilities looking for opportunities in the IT sector. Activities: • Periodic meetings for monitoring and sharing recruitment needs • Periodic meetings to monitor the onboarding of new employees identified under these partnerships • Participation in initiatives that promote, identify and attract diverse talent • Posting of job opportunities on partner organizations' platforms.	D&I Team, Recruitment Team, Business	No specific costs	• Two new hires under these partnerships. • Participation in at least two events promoted by one of the partner organizations.	All year

Aspect: Inclusion of Under-represented Groups

Goal	Measures	Departments in Charge	Financial Investment	Evaluation Indicators	Timeframe
Promote awareness and celebration of workplace diversity and inclusion.	Initiative for combating the stigma and bias associated with disabilities, both inside and outside the company. It aims to promote a fairer, more humane and inclusive perception of people with disabilities, underscoring the importance of equal opportunities, accessibility and inclusion in the workplace. Activities: • Organization of a panel of real stories, with testimonials from people with an IT background. • Invitation of professionals with experience in the field to share their challenges and successes, raising awareness and inspiring employees. • Social network posts about the event	D&I Team, Communication	No specific costs	• More than 100 participants; • NPS >50	Q4 2025 (3 December)
Support the professional and social integration of immigrants and refugees.	Initiative for the social and professional inclusion of refugees and immigrants in partnership with the Lisbon Project. Activities: • Training sessions on HR topics (e.g. recruitment, skill building, interviews) • Inclusive football tournament to strengthen community ties and well-being	D&I Team, People, Communication	Training €400 Football team €500	• NPS of participants > 50% • Number of participants in the tournament One in-house team • Qualitative feedback obtained in partnership with the Lisbon Project	Q4 2025 (December)

Aspect: Inclusion of Under-represented Groups

Goal	Measures	Departments in Charge	Financial Investment	Evaluation Indicators	Timeframe
Promote awareness and celebration of workplace diversity and inclusion.	Diversity Month initiative to celebrate and give visibility to the company's cultural richness and diversity through inspiring educational content promoting inclusion, curiosity and cultural exchange between employees. Activities: • Creation of a weekly presentation (total of four) on various topics: • Literature: book recommendations from various nationalities. • Music: presentation of the cultural background of local music, with a shared playlist of employee suggestions. • Cuisine: featured restaurant, dish or recipe of the week. • Expressions and sayings: comparison of expressions between different languages to raise awareness on cultural differences.	D&I Team, Communication	No specific costs	• NPS >50	Q2 2026 (May)
Promote the employability and professional integration of neurodivergent people.	Sessions with CADIn experts to prepare teams to welcome, include and assist neurodivergent people in the workplace. Activities: • Training sessions for internal staff involved in recruitment processes.	D&I Team, Recruitment Team, Business	No specific costs	• - Target group of 40 people trained • NPS >50	Q3 2025

Aspect: Impact Assessment and Monitoring

Goal	Measures	Departments in Charge	Financial Investment	Evaluation Indicators	Timeframe
Ensure fair, accessible and bias-free recruitment processes.	Inclusive Recruitment Initiative, which aims to ensure that all selection and integration processes are done in a fair, transparent and accessible manner. The program promotes equal opportunities, reinforces diversity in the applicant pipeline and ensures adaptation and follow-up from the time of application until the time of onboarding at the organization. Activities: • Continuation and strengthening of the applicant inclusion process within the scope of inclusive recruitment. • Refinement of the process to allow auditing of the reasons for excluding applicants. • Comprehensive monitoring of the recruitment process from start to finish. • Guaranteed adaptation of the workplace, when applicable. • Monitoring the onboarding and integration of new employees hired. • Promotion of organizational awareness involving respect, inclusion and non-discrimination.	D&I Team, Recruitment Team, Business	No specific costs	• Number of inclusive recruitment interviews done >50	All year
Evaluate and monitor employee perceptions of inclusion and psychological safety.	Anonymous survey based on the APPDI tool to collect perceptions of diversity, inclusion and psychological safety at the workplace. Activities: • APPDI questionnaire; • Focus group to analyse the results in depth.	D&I Team, Communication	€2750	• 35% response rate; • List of recommended actions based on questionnaire results.	Q4 2025 (October/ November)

Aspect: Awareness-raising, Education and Organizational Culture

Goal	Measures	Departments in Charge	Financial Investment	Evaluation Indicators	Timeframe
Constantly communicate organizational commitment to diversity and inclusion.	Promoting a culture of inclusion by sharing work done in this area, while encouraging proactive awareness within the organization. Activities: • Publication of article: How to create inclusive work environments for LGBTQIA+ people: visibility, mental health and psychological safety • Publication of article: Digital accessibility as a cornerstone of inclusive innovation: eSign case study • Publication of article: Cultural diversity in technology: the impact of integrating immigrants and refugees • Publication of article: The world is no longer only made for men: how to reduce imbalances in STEM fields • Selection of at least one article for external publication (e.g. Beacon institutional blog, LinkedIn)	D&I Team, Communication	No specific costs	• Publication of four or more articles in internal channels	All year

Aspect: Awareness-raising, Education and Organizational Culture

Goal	Measures	Departments in Charge	Financial Investment	Evaluation Indicators	Timeframe
Educate and train employees on inclusion, biases and safe working environments.	Ongoing diversity and inclusion training for teams, focusing on unconscious bias, accessibility, harassment prevention and inclusive talent management. Activities: • Relaunch and frequent scheduling of the in-person course on Unconscious Bias • Launch of mandatory e-learning on unconscious bias • Launch of mandatory e-learning on the inclusion of people with disabilities • Launch of mandatory e-learning on harassment prevention • Launch of mandatory e-learning on inclusive talent management - mandatory	Training Team, D&I Team, Recruitment Team	No specific costs	• In-person Unconscious Bias training: 100 participants from the target audience; NPS > 50; • Unconscious Bias e-learning training: 50% participation; NPS > 50; • Disability Inclusion e-learning training: 50% participation; NPS > 50; • Harassment Prevention e-learning training: 50% participation; NPS > 50; • Inclusive Talent Management e-learning training: 50% participation; NPS > 50.	All year

Aspect: Awareness-raising, Education and Organizational Culture

Goal	Measures	Departments in Charge	Financial Investment	Evaluation Indicators	Timeframe
Promote digital accessibility and ensure that all people, regardless of visual, motor or cognitive challenges, can use the company's digital solutions independently and safely.	Adaptation of the internal digital signature (eSign) solution to ensure its accessibility to all users, including people with visual, motor or cognitive impairments, promoting equal access to work tools. Activities: • Identify, in partnership with institutions, people with disabilities to test the accessibility of the eSign product • Communicate the initiative within the company • Communicate the initiative on social networks • Explore the possibility of awarding the Usability and Digital Accessibility Seal	Design Team, D&I Team, Product Team, Marketing	No specific costs	• eSign accessibility validated in tests with disabled users • Qualitative and quantitative feedback from disabled users • Final report on compliance with accessibility standards	Q1 2026
Educate and train employees on inclusion, biases and safe working environments.	Talking about menopause in the workplace is essential to promote inclusion and combat biases. Many women experience physical and emotional symptoms that can impact their performance, well-being and confidence at work. By creating safe spaces to share experiences and improve knowledge, we contribute towards more empathetic teams, fairer policies and truly inclusive working environments. Activities: • Inclusive Talks: Open sessions with experts and in-house testimonials on relevant topics, promoting well-being and awareness. On Women's Day, we will be holding a session dedicated to menopause, promoting a space for dialogue, sharing and information. • Social network posts about the initiative	D&I Team, Communication	No specific costs	• Inclusive Talk about menopause on Women's Day • More than 100 participants • NPS above 50%	Q1 2026 (March)

Aspect: Awareness-raising, Education and Organizational Culture

Goal	Measures	Departments in Charge	Financial Investment	Evaluation Indicators	Timeframe
Reinforce the company's commitment to diversity and inclusion, aligning itself with best practices and expanding the network of contacts and partnerships in this area.	Become an active member of the LGBTI Diversity and Inclusion Network (REDI), participating in its initiatives, events and working groups to promote a more inclusive and diverse culture at the organization and in the business community. Activities: • Formal enrolment and integration process into REDI • Participation in events, workshops and working groups • Planning for the adoption of best practices through REDI • Internal and external publicizing of joining REDI	D&I Team, Communication	• Annual REDI membership fee (€2950) • Costs associated with participating in events (travel, registration) (~€1000)	• Confirmation of official REDI membership • Plan for best practices to be adopted through REDI	Q2 2026 (April–June)

Aspect: Awareness-raising, Education and Organizational Culture

Goal	Measures	Departments in Charge	Financial Investment	Evaluation Indicators	Timeframe
Promote awareness and celebration of workplace diversity and inclusion.	As part of the month of June, which is dedicated to the LGBTQIA+ community, Novabase/Celfocus is celebrating Pride Month with a high-impact symbolic initiative: changing the company logo at its official social networks. This action aims to promote visibility and proactive support for diversity and inclusion, reinforcing Novabase/Celfocus' commitment to creating an inclusive work environment where all identities are valued and respected. In addition to this symbolic change, the initiative includes internal and external communications demonstrating the company's clear position in favour of inclusion and against all forms of discrimination based on sexual orientation or gender identity. Activities: • Temporary change of logo on social networks (LinkedIn, Instagram) • Internal publication commemorating Pride Month • Public Instagram post reinforcing support for LGBTQIA+ inclusion and non-discrimination	D&I Team, Communication	No specific costs	n/a	Q2 2026 (June)

Aspect: Awareness-raising, Education and Organizational Culture

Goal	Measures	Departments in Charge	Financial Investment	Evaluation Indicators	Timeframe
Promote awareness and appreciation for cultural diversity through intergenerational and educational experiences.	Initiative to raise awareness on diversity, equity and inclusion (DEI) issues from the standpoint of children of Novabase/Celfocus employees. The aim is to show that curiosity is a powerful tool for inclusion and combating biases. Activities: • Creation of a video for social networks on multiculturalism with employees' children	D&I Team, Communication	No specific costs	n/a	Q2 2026 (June) Children's Day
Boost the presence and leadership of women in the technology and digital sector.	The Women Shaping Tech award, promoted by the Portuguese Association for the Development of Communications (APDC) in partnership with various companies including Novabase/Celfocus, aims to recognize and boost initiatives promoting women's participation and retention in STEM areas, expanding their impact through greater visibility and support.	D&I Team, Communication	€5000	n/a	Q4 2025 (October)
Promote awareness and celebration of workplace diversity and inclusion.	Promote awareness and celebration of workplace diversity and inclusion, emphasizing the importance of mental health. Activities: • Dissemination of informative content on World Mental Health Day, underscoring the importance of psychological well-being in the workplace. • Publicizing free psychological support services and other resources available to those who need help.	D&I Team, Communication	No specific costs	n/a	Q4 2025 (10 October)

Table 3. Measures and actions planned from September 2025 to September 2026