



DIVERSITY AND NON- DISCRIMINATION POLICY

novobanco Group



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Scope

The novobanco Group believes that the best results are achieved through an organizational culture that promotes diversity, equity, inclusion ('DEI') and non-discrimination as strategic pillars of transformation, innovation and growth. For the purposes of this Policy, the novobanco Group refers to Novo Banco, S.A. and the credit and financial institutions controlled by the Bank, including its subsidiaries: Novo Banco dos Açores, S.A. (hereinafter referred to as novobanco dos Açores), BEST – Banco Eletrónico de Serviço Total, S.A. (hereinafter referred to as Banco BEST), and GNB – Gestão de Ativos, Sociedade Gestora de Organismos de Investimento Coletivo, S.A. (hereinafter referred to as GNB Gestão de Ativos), as well as the entity it controls, namely GNB – Sociedade Gestora de Fundos de Pensões, S.A. (hereinafter referred to as GNB Fundo de Pensões).

The “*People and Culture*” pillar is one of the four fundamental axes of our corporate strategy, reflecting the central role of people in building a fairer, more innovative and sustainable organization.

By fostering an inclusive and diverse environment, the novobanco Group reinforces its commitment to the holistic development of its employees, creating the necessary conditions for each individual to reach their full potential. The Group seeks to understand the needs and challenges throughout the employee lifecycle, contributing to their overall growth and fulfilment.

Equality, Equity, Inclusion and Non-Discrimination Principles

1. Purpose

The purpose of this Diversity and Non-Discrimination Policy (“Policy”) is to establish the novobanco Group’s guidelines for promoting Diversity, ensuring broader and more inclusive representation of employees with different experiences, ages, genders, cultures and backgrounds. This approach aims to strengthen the organization’s ability to attract and retain talent across various areas, providing an enriching experience aligned with the Bank’s values.

At novobanco Group, Diversity is understood in a broad sense, encompassing both visible characteristics, such as age, gender, ethnicity or physical disability and non-visible factors, including values, beliefs, marital status, sexual orientation, gender expression, identity, or temporary or permanent disabilities. This inclusive perspective is a key pillar in building a fair, respectful and empowering work environment that values the unique contribution of each employee.

2. Commitment of the novobanco Group

Diversity requires attention across all contexts, and the novobanco Group positions itself and conducts its relationships as an agent of transformation, upholding a firm commitment to promoting diversity, gender equality and the reduction of inequalities. We believe that all employees, regardless of gender, background, personal condition or circumstance, should have equitable access to learning, development and the fulfilment of their potential, within an environment that fosters professional growth and prosperity. At novobanco Group, we are committed to creating a workplace where every individual is treated with dignity and respect. The Group's Diversity Policy promotes the principle of fair and equal treatment of all candidates and employees, ensuring that everyone has the same opportunities to access roles with greater responsibility and to develop through accessible and inclusive programs, free from discrimination. We promote professional development and continuous training with respect for diversity, recognizing the unique value of each employee. We believe that differences, whether visible or invisible — can be powerful drivers of fulfilment, innovation and performance.

We are committed to complying with the applicable national legislation at all times and to acting in accordance with relevant international standards, regulations and conventions on Diversity, Equity, Inclusion and Non-Discrimination. We ensure a discrimination-free environment, with zero tolerance for discriminatory practices, promoting the acceptance and inclusion of differences and safeguarding the fair management of opportunities, as well as raising awareness.

We encourage employees to freely express their concerns and ideas, including

through channels such as Whispli and bilateral communication in meetings, reinforcing a culture that is inclusive and supportive of diversity.

3. Scope of Application

The principles of Diversity, Equity, Inclusion and Non-Discrimination set out in this Policy apply to all employees of the novobanco Group, regardless of their role, hierarchical level or location.

These principles also extend to candidates, trainees, interns, subcontractors, suppliers, service providers and other stakeholders who, directly or indirectly, are involved in the activities of the companies that form part of the novobanco Group.

4. Definitions

Diversity: Refers to the presence and appreciation of distinct characteristics among individuals, such as age, gender, ethnicity, culture, sexual orientation, disability, among others. Within the organizational context of the Group, this concept translates into the recognition and valuing of differences among employees, promoting an inclusive environment where people of different backgrounds, genders, ages, perspectives and skills contribute uniquely and fully to collective success. Diversity encompasses not only visible aspects, but also non-visible factors such as beliefs, experiences, knowledge and personal contexts.

Equality: Aims to ensure that all employees have equitable access to the same opportunities, regardless of their personal circumstances. It means that no one may be favored, privileged, benefited, harmed, deprived of any right or exempted from any duty based on ancestry, gender, race, language, place of origin, religion, political or ideological beliefs, education, economic situation, social condition or sexual orientation. Equality requires the removal of systemic barriers that may hinder individuals from participating fully, fairly and with dignity.

Equity: Recognizes that each person has different starting points, needs and circumstances. This concept guides the creation of fair conditions that enable everyone to achieve the same level of success, by providing appropriate support tailored to the realities of those who require resources or opportunities. It includes

initiatives such as mentoring programs or reasonable adjustment measures to ensure the effective inclusion of employees with different needs.

Non-Discrimination: Is the principle that guarantees fair and equitable treatment of all individuals, without distinction based on factors such as gender, age, ethnicity, sexual orientation, religion, disability or any other personal condition. It involves ensuring equal opportunities in the Group's practices, promoting an inclusive, respectful and prejudice-free environment.

5. Diversity Strategy and Action Plans

The novobanco Group's diversity strategy, aligned with the strategic pillar People & Culture, is based on promoting an inclusive and equitable environment, ensuring that all individuals, regardless of their personal characteristics or identities, have access to the same opportunities and are valued for their talent and contributions. To achieve this, the Bank adopts a strategic approach that includes implementing recruitment and career progression processes based on merit and fairness, encouraging diversity of profiles and ensuring representation across all roles.

In addition, the Group offers training and awareness programs on diversity, inclusion and unconscious bias through its learning and e-learning platforms, equipping employees and leaders to build a more respectful and equitable workplace.

To ensure equity, the novobanco Group sets representation targets and regularly monitors diversity indicators, assessing the impact of its initiatives. The Group has placed particular emphasis on gender within its diversity strategy, and annual diversity plans include measures and indicators to ensure collective commitment to gender diversity and equality across novobanco and the wider Group. The Gender Equality Plan includes, among other elements:

- i) The definition of management indicators to monitor alignment with the diversity strategy;
- ii) The implementation of external and internal recruitment processes with gender metrics;
- iii) The evaluation and management of the pay gap;

- iv) The development of career plans and promotion processes that encourage gender diversity;
- v) The implementation of methodologies and programs to support work-life balance and foster an environment of knowledge-sharing.

Another area that has received particular attention at novobanco is the inclusion of people with disabilities. Measures implemented in this regard include:

- i) Promoting internship opportunities for people with disabilities;
- ii) Preparing facilities and, whenever feasible, software solutions to ensure accessibility for individuals with mobility, visual, or other functional limitations.

6. Discriminatory Practice and Prevention

All actions by entities within the novobanco Group or their employees that favor or disadvantage any employee or candidate based on ancestry, age, gender, sexual orientation, marital status, family situation, nationality, ethnic origin, religion, or political or religious beliefs are considered discriminatory and are therefore prohibited.

Discrimination based on medical information, especially genetic data, is also strictly prohibited.

The novobanco Group has implemented mechanisms to prevent discriminatory practices, whether direct or indirect, by applying objective criteria in promotion and selection processes, evaluating pay gaps during salary reviews, and providing employees with experiences that benefit both them and the organization.

All individuals subject to this Policy must demonstrate sensitivity and mutual respect, refrain from any behavior deemed offensive, and ensure respect for human dignity.

The novobanco Group ensures the availability of training, awareness, and education programs focused on gender equality and non-discrimination.

7. Control Systems

Any individual may report discriminatory conduct or behavior within the novobanco Group. To facilitate this, each entity within the Group provides a reporting channel — *Whispli* — with the option to remain anonymous. In accordance with the novobanco Group's Code of Conduct, employees are obligated to report discriminatory conduct. Reports that are not anonymous will be handled with confidentiality and discretion, ensuring that the situation is investigated appropriately.

Employees must maintain the confidentiality of sensitive company information, sharing it only with individuals directly involved in the relevant processes, and must avoid unauthorized personal investigations. This practice safeguards data integrity and trust and prevents the sharing of information with individuals not involved in the process.

Reports may be submitted through internal channels, to individuals directly responsible for team management—provided a psychologically safe environment is ensured, or directly to the Human Capital Department of the novobanco Group.

Whistleblowers acting in good faith and with reasonable grounds will be guaranteed confidentiality and protection against retaliation. The novobanco Group will not tolerate any acts of retaliation ¹, whether financial or emotional, against employees who report violations. Conversely, reports made in bad faith, when proven, will have appropriate consequences.

Any sanctions resulting from investigations related to discriminatory practices will follow the institution's disciplinary procedures.

8. Policy Review

¹ Any acts or omissions, whether direct or indirect, that occur as a consequence of a report and result in detriment to the whistleblower.

The Human Capital Department of the novobanco Group is responsible for reviewing this Policy, with support from the Legal Department and the ESG Office, whenever necessary, particularly in the event of legal, regulatory, or internal changes, and at minimum, on a biennial basis.

The novobanco Group ensures the involvement of employee representative bodies in the definition and implementation of diversity and non-discrimination policies.

9. Approval and Publication

This Policy was approved by the Executive Board of novobanco on 02.12.2025 and by the Boards of Directors of the Group's subsidiaries and will be published internally and on the institutional websites of the Bank, as well as those of the novobanco Group entities, and incorporated into internal regulations.

