

Non-financial information disclosure template for companies issuing securities admitted to trading on a regulated market

This report template aims to assist companies disclosing non-financial information and help stakeholders to consult and use such information. Thus, this template supports compliance with existing European information disclosure duties, by compiling simple, accurate, clear, complete and comparable information and providing it to investors and other stakeholders.

Non-financial information reported by issuers is inherently diverse; therefore, it is fundamental to ensure a threshold of comparability. To this end, companies must organise information in identical form - i.e., by using the same structure or, alternatively, by including a table of correspondence between this model and their reports, highlighting the pages and/or chapters of the reports where information is provided - and that they disclose concrete policies and objectives accompanied by the reporting of concrete action and information that is adequate for impact assessment. The aim is to provide any user of this information with tools for assessing the issuer's non-financial matters situation, to measure and syndicate its evolution over time, and thus contribute to a more comprehensive financial decision-making.

The proposed template results from the applicable legal rules. No additional information provision requirements are established, rather the way the information is structured and presented is key, guided by criteria of comprehensibility and comparability. Maintaining the focus on the usefulness and comparability of the information disclosed, the elements and indicators provided for in this template are the result of numerous contributions received during public consultation and represent a compromise among distinct market agents who filed their opinions and who are addressed herein.

However, as issuers operate in distinct realities and information requirements always entail certain challenges, this template includes flexible and reasonable elements to adapt to these multiple realities.

Therefore, no minimum or maximum wordcount is set in each point, but it is advisable to provide indispensable information to accurately characterise a company's situation in each area.

Correspondingly, if an element is not (yet) applicable to the issuer, it is sufficient to include a reference that such information requirement lacks a policy or that it is not applicable to the company, accompanied by current implementation status and the company's prospects.

In the same vein, considering that some of the information reported in this context may already be disclosed in other reporting obligations (e.g. in the management report or in the corporate governance report), it may be included by reference, identifying the place where the information may be consulted. Any information included by reference should be clear and is subject to the regime of disclosure and approval required for the report of non-financial information¹. Also, in order to avoid duplication of information, information may be inserted by cross-reference within the report template itself.

¹ That is, disclosure under Article 66-B and approval by the general meeting under Article 65, both of the Commercial Companies Code.

The advantages of a union of reports are also acknowledged and companies may at their discretion unite in one document different information disclosure obligations to prevent that information is reported in excess or in a manner that is difficult to analyse and compare. Where an integrated report is prepared, it is particularly relevant to use a table of correspondences by reference to this template, as per above.

In the first year that the company must report non-financial information, the report may relate to that year alone. Notwithstanding, where possible, it is useful and desirable to disclose previous years' information (to outline the evolution development of the issues subject to reporting).

Although this template is primarily addressed to regulated market issuers - those subject to non-financial reporting - other entities (notably, companies with securities admitted to trading on other trading platforms) may also elect to report this information and use this report template.

Despite its non-binding (optional) nature, it is advisable to adopt this template on a voluntary basis; naturally, issuers remain free to elect their reporting system (as provided by law).

Lastly, this is a dynamic template, and therefore after some stability is achieved, its contents will accompany market evolution, responding to market needs and promoting increasing use of this template.

PART I - INFORMATION ON ADOPTED POLICIES

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| A. INTRODUCTION | <ol style="list-style-type: none"> 1. Description of the Company's general policy regarding sustainability issues, indicating any changes to previously approved policy. 2. Description of non-financial information reporting methodology and reasons for its adoption, including any changes in relation to previous years and reasons therefore. |
| B. CORPORATE AND BUSINESS MODEL | <p>General description of the Company's/Group's business model and form of organisation, stating the main business areas and markets of operation (if possible, using organisational charts, graphs or functional diagrams).</p> <p><i>Reference can be made to other parts or annexes of the Management Report or other disclosed document that outline the business model, allowing unrestricted analysis by investors and other stakeholders.</i></p> |
| C. MAIN RISK FACTORS | <ol style="list-style-type: none"> 1. Identification of the main risks associated to the matters under report and arising from the Company's activities, products, services or business relations, including, where applicable and possible, supply and subcontracting chains. 2. Indication of how the Company identifies and manages these risks. 3. Explanation of the functional division, including governing bodies, commissions, committees, or departments responsible for risk identification and management/monitoring. 4. Express indication of any new and former risks identified by the Company regarding previous years. 5. Indication and brief description of the main opportunities identified by the Company regarding the matters in the report. <p><i>Reference can be made to other parts or annexes of the Management Report or other disclosed document that identify business risks, allowing unrestricted analysis by investors and other stakeholders.</i></p> |

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| D. IMPLEMENTED POLICIES | Description of policies: i. environmental, ii. social and tax, iii. employees, gender equality, and non-discrimination, iv. human rights and v. anti-corruption and anti-bribery, including due diligence policies, and implementation outcomes, including related non-financial key performance indicators and year-over-year comparison. |
| i. ENVIRONMENTAL POLICIES | <ol style="list-style-type: none"> 1. Description of the Company's strategic objectives and key actions to achieve those. 2. Description of the established key performance indicators. <p><i>These indicators meet the criteria of materiality, relevance and reliability, as well as comparability and accountability, and the report mentions the table of indicators (national, European, or international) used for each subject, as well as a brief justification for choosing the table, while also presenting a comparison of those indicators with the previous one.</i></p> <ol style="list-style-type: none"> 3. Indication, on a year-over-year basis, of the degree to which these objectives were achieved, by reference to at least: <ol style="list-style-type: none"> i. Sustainable use of resources: consumption of water, other raw materials and energy; indication of measures taken to improve the resource use efficiency; indication of the use of measures to promote energy efficiency and renewable energy use. ii. Pollution and climate change: indication of greenhouse gas emission values; indication of pollutant emissions; indication of any penalties incurred and of any measures to prevent, reduce or repair these emissions. iii. Circular economy and waste management: measures for preventing, recycling, reusing or other forms of recovering and disposing of waste. iv. Biodiversity protection: impacts caused by activities or operations in protected areas and measures taken to preserve or restore biodiversity. <p><i>Where possible, reference may be made to information contained in another document, indicating its location.</i></p> |
| ii. SOCIAL AND TAX POLICIES | <ol style="list-style-type: none"> 1. Description of the Company's strategic objectives and key actions to achieve those. 2. Description of the established key performance indicators. <p><i>These indicators meet the criteria of materiality, relevance and reliability, as well as comparability and accountability, and the report mentions the table of indicators (national, European, or international) used for each subject, as well as a brief justification for choosing the table, while also presenting a comparison of those indicators with the previous one.</i></p> <ol style="list-style-type: none"> 3. Indication, on a year-over-year basis, of the degree to which these objectives were achieved, by reference to at least: <ol style="list-style-type: none"> i. Company's commitment to the community: impact of the Company's activity on employment and local development; impact of the Company's activity on local populations and territory; relations maintained with local community agents and means of dialogue; partnership or sponsorship actions. ii. Subcontracting and suppliers: inclusion in the procurement policy of social, gender equality and environmental issues; provisions for social, environmental and governance responsibility in supplier and subcontractor relations; control and audit systems and respective results. Where possible, reference to suppliers' policies consistent with the Company's policies. iii. Consumers: measures for consumer health and safety; systems for receiving complaints and their handling and resolution, namely the number of complaints received and the number of pending complaints, including which ones were successful, satisfaction surveys, and indication of the complaints officer. |

iii. EMPLOYEES AND
GENDER EQUALITY
AND NON-
DISCRIMINATION

- iv. **Responsible investment:** information on the responsible investment the Company aims to attract, including as to the issue/acquisition of *green bonds* or *SDG-linked bonds*.
- v. **Stakeholders:** information on stakeholder consultation means.
- vi. **Tax information:** information on measures or actions with tax impact, including any subsidies or any type of subvention or financial benefit granted by the State.

Where possible, reference may be made to information contained in another document, indicating its location.

1. Description of the Company's strategic objectives and key actions to achieve those.
2. Description of the established key performance indicators.

These indicators meet the criteria of materiality, relevance and reliability, as well as comparability and accountability, and the report mentions the table of indicators (national, European, or international) used for each subject, as well as a brief justification for choosing the table, while also presenting a comparison of those indicators with the previous one.

3. Indication, on a year-over-year basis, of the degree to which these objectives were achieved, by reference to at least:
 - i. **Employment:** total number and distribution of employees by gender, age, country and job classification, as well as total number and distribution of contractual arrangements (e.g. employment contract, service providers, temporary work, etc.) by gender and age, average length of contracts; percentage of the workforce receiving the national minimum wage, regardless of the contract type; remuneration for equal or average positions in the company, by gender; average remuneration of directors and managers, including variable remuneration, allowances, severance payments, payment to long-term savings schemes and any other payment broken down by gender; employees with disabilities (including indication of how the Company is complying, or preparing to comply, with Law No. 4/2019 of 10 January on the employment quota system for disabled persons).
 - ii. **Work organisation:** organisation of working time, including measures to facilitate work and family life separation.
 - iii. **Health and safety:** health and safety conditions at work and number of accidents at work.
 - iv. **Social relations:** organisation of social dialogue, including staff information and negotiation procedures , in particular the number of interactions with trade unions and/or workers' commissions, if any; new agreements concluded or revision of agreements in force; number of court cases and complaints to the Authority for Working Conditions; percentage of employees covered by collective agreements by country; evaluation of collective agreements, particularly in the field of health and safety at work.
 - v. **Training:** policies applied in the area of training and the type of training (e.g. whether the company provides its employees with training on issues related to the evaluation of the company's performance in "non-financial" matters (e.g. protection of privacy/GPD, anti-money laundering/AML, human rights in the value chain, etc.); training time / employee number ratio.
 - vi. **Equality:** measures/policies taken to promote equal gender treatment and opportunities; equality plans; number of dismissals by gender; protocols against sexual harassment and gender-based harassment; policies for integration and universal accessibility for people with disabilities; policies against all types of discrimination and, where appropriate, diversity management.

Where possible, reference may be made to information contained in another document, indicating its location.

iv. HUMAN RIGHTS

1. Description of the Company's strategic objectives and key actions to achieve those.
2. Description of the established key performance indicators.

These indicators meet the criteria of materiality, relevance and reliability, as well as comparability and accountability, and the report mentions the table of indicators (national, European, or international) used for each subject, as well as a brief justification for choosing the table, while also presenting a comparison of those indicators with the previous one.

3. Indication, on a year-over-year basis, of the degree to which these objectives were achieved, by reference to at least:
 - i. **Due diligence procedures** applied regarding human rights, in particular in respect of supplier and service provider contracts.
 - ii. **Measures to prevent the risk** of human rights violations and, where appropriate, measures to remedy any abuses; elimination of employment-related discrimination (where not mentioned above); elimination of forced or compulsory labour; effective abolition of child labour.
 - iii. **Lawsuits** for human rights violations.

Where possible, reference may be made to information contained in another document, indicating its location.

v. FIGHT AGAINST
CORRUPTION AND
BRIBERY ATTEMPTS

1. **Corruption prevention:** measures and instruments adopted to prevent corruption and bribery; policies implemented to dissuade employees and suppliers from engaging in these practices; information on the compliance system, indicating the relevant functional managers, if any; indication of legal proceedings involving the Company, its directors or employees related to corruption or bribery; measures adopted in relation to public procurement, if relevant.
2. **Prevention of money laundering (for issuers subject to these rules):** information on measures to prevent and combat money laundering.
3. **Codes of ethics:** indication of any code of ethics to which the Company may have adhered or which it may have implemented; indication of the respective mechanisms for implementation and monitoring of compliance with the code, if applicable.
4. **Management of conflicts of interest:** measures to manage and monitor conflicts of interest, namely requiring managers and employees to sign declarations of interest, incompatibilities and impediments.

PART II – INFORMATION ON STANDARDS / FOLLOWED GUIDELINES

1. IDENTIFICATION OF THE STANDARDS/GUIDELINES FOLLOWED FOR REPORTING NON-FINANCIAL INFORMATION

Identification of the standards / guidelines followed for preparation of non-financial information, including alternatives and other principles considered in the Company's performance, if applicable.

In case the Company refers to the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda, include identification of those to which the Company is committed to contribute, indicating the measures taken each year to achieve the goals set for each of these SDGs. In other words, identify concrete actions, projects or investments aimed at achieving these SDGs.

2. IDENTIFICATION OF THE SCOPE AND METHODOLOGY FOR CALCULATING INDICATORS

Description of the scope and calculation methodology (including the calculation formula) for the relevant indicators, including any limitations of the reporting.

Where possible, a table should be presented showing correspondence between the relevant indicators and principles or objectives, referring to the location where the information is detailed (e.g., the page of the stand-alone report on non-financial information, the annual report, different document or the Company's website).

3. REASONS FOR LACK OF APPLICATION OF A POLICY

If the Company does not apply policies with respect to one or more issues, the non-financial information report provides an explanation why this is the case.

4. OTHER INFORMATION

Additional elements or information that are not included in the previous points but are relevant for understanding framing and justifying the relevance of disclosed non-financial information, in particular regarding networks/groups of entities linked to issues of organisations' sustainability and responsibility that it is a member of/ belongs to, whether at national or international level, and sustainability commitments that the Company has pledged at its discretion, at local or global level.



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