

# NovaMente Soluções Cognitivas

Document 07 — Vacation, Leave & Attendance Policy

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## Introduction

This document defines NovaMente's policies on vacation, all categories of leave, and attendance. It is grounded in Brazilian labor law (CLT) while reflecting NovaMente's commitment to employee wellbeing and flexibility. Where NovaMente's policies exceed legal minimums, this document makes that explicit.

NovaMente believes that rest is not a reward — it is a professional necessity. We encourage every employee to use the full leave entitlements available to them and we do not view unplugging from work as a sign of low commitment. A culture that celebrates overwork produces burnout, and burnout is precisely what our product exists to prevent.

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## Annual Vacation

### Entitlement

All full-time employees are entitled to 30 calendar days of paid vacation per year, in accordance with CLT. The vacation entitlement accrues after each 12-month employment period (período aquisitivo) and must be taken within the following 12 months (período concessivo). NovaMente does not permit indefinite deferral of vacation — unused vacation that expires is paid out as part of the annual salary adjustment or upon departure, but the company actively works to prevent this from happening.

### Scheduling

Employees are responsible for scheduling their vacation in coordination with their manager. Requests should be submitted at least 15 calendar days in advance through the HR system. Managers are expected to approve vacation requests unless there is a specific operational conflict, in which case they must propose an alternative window within 30 days. Vacation may be split into up to three periods, with at least one period being a minimum of 14 consecutive calendar days, in accordance with CLT.

### Vacation Bonus (Terço Constitucional)

Employees receive a constitutional vacation bonus equal to one-third of their monthly salary, paid at the time vacation is taken, as required by Brazilian law. NovaMente processes this payment at least two working days before the vacation period begins.

### Collective Vacation

NovaMente observes a collective vacation period during the last week of December and first week of January. During this period, the entire company closes and all employees are on leave

simultaneously. This period is counted as part of each employee's annual vacation entitlement. Employees who have not yet accrued sufficient vacation days to cover the collective period will have the difference recorded as an advance on future entitlement.

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## **Sick Leave**

Employees who are unable to work due to illness or injury must notify their manager as early as possible on the first day of absence, preferably before their normal start time. For absences of up to two consecutive working days, no medical documentation is required. For absences of three or more consecutive working days, a medical certificate (atestado médico) must be submitted to the HR & Culture team within 48 hours of return.

NovaMente pays full salary during the first 15 days of any single illness episode, after which INSS social security benefits apply in accordance with Brazilian law. NovaMente will not penalize employees for legitimate illness absences, and managers are expected to exercise empathy and flexibility in supporting colleagues who are dealing with health challenges.

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## **Mental Health Leave**

In addition to the four annual mental health days described in Document 05, employees who require extended leave due to a diagnosed mental health condition — including depression, anxiety disorders, burnout syndrome, and similar conditions — are supported through the same sick leave framework as physical illness. A medical or psychological certificate is required for absences exceeding two consecutive working days.

NovaMente's in-house psychologist may issue certificates for mental health-related absences when clinically appropriate. Employees are encouraged to consult the psychologist at the first signs of mental health difficulty rather than waiting for a crisis. Early intervention is both better for the individual and easier to support organizationally.

NovaMente is committed to a supportive return-to-work process for employees returning from extended mental health leave. In these cases, the HR & Culture team, the in-house psychologist, and the employee's manager collaborate to define a phased return plan that protects the employee's recovery while enabling their reintegration into the team.

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## **Parental Leave**

### **Maternity Leave**

Employees who give birth are entitled to 180 days of fully paid maternity leave, exceeding the 120-day statutory minimum. Leave begins on the day of birth or up to 28 days before the expected due date, at the employee's option. NovaMente does not require the employee to return before the end of the 180-day period, and will maintain all benefits during the leave. Employees are encouraged to discuss their return-to-work preferences with their manager and HR before the leave

begins, so that arrangements can be made in advance.

### **Paternity and Co-Parent Leave**

Employees who are the secondary caregiver at the birth or adoption of a child are entitled to 20 days of fully paid paternity leave, exceeding the 5-day statutory minimum. Leave must be taken within 30 days of the birth or adoption. NovaMente treats all caregiver relationships equally — the policy applies regardless of gender or relationship structure.

### **Adoption Leave**

Employees who adopt a child under the age of 12 are entitled to parental leave on the same terms as biological parents, with the leave period beginning on the date of custody transfer. Documentation of adoption must be provided to the HR & Culture team within 30 days.

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### **Bereavement Leave**

Employees who experience the death of an immediate family member are entitled to five consecutive working days of paid bereavement leave. Immediate family members are defined as: spouse or partner, children, parents, siblings, and grandparents. For the death of extended family members — such as in-laws, aunts, uncles, or close friends — employees may request additional unpaid leave or use accrued vacation days, subject to manager approval.

NovaMente recognizes that grief does not follow a schedule. Employees who need additional support following bereavement are encouraged to speak with the in-house psychologist and to have an open conversation with their manager about what they need. NovaMente will make reasonable accommodations to support employees during periods of personal loss.

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### **Other Types of Leave**

#### **Marriage Leave**

Employees who marry or enter into a civil union are entitled to three consecutive calendar days of paid leave. Leave must be taken within 30 days of the ceremony. Documentation of the marriage or union must be submitted to HR.

#### **Educational Leave**

Employees enrolled in higher education programs may request up to two half-days per month for exams or required academic activities, subject to advance notice and manager approval. These absences do not count against sick leave or vacation. NovaMente supports employees who are investing in their education and will work flexibly to accommodate academic commitments where operationally possible.

#### **Jury Duty and Civic Obligations**

Employees required to fulfill civic obligations — including jury service, electoral duties, or mandatory military reserve activities — are entitled to paid leave for the duration of the obligation, as required by Brazilian law. Documentation must be presented to HR as soon as the obligation is known.

### **Unpaid Leave**

Employees may request unpaid leave for personal reasons not covered by the categories above. Unpaid leave requests are evaluated individually and require approval from the department head, the HR & Culture team, and, for leaves exceeding 30 days, the COO. During unpaid leave, salary and variable benefits cease, but health and dental insurance may be maintained at the employee's expense. Return-to-work arrangements must be confirmed in writing before the leave begins.

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### **Attendance and Punctuality**

NovaMente does not operate a rigid time-tracking system, but we do expect employees to be available during core hours (10:00 AM to 4:00 PM BRT, Monday through Friday) and to communicate proactively when they are not. Consistent unexplained absences or patterns of unavailability during core hours will be addressed by the employee's manager through a direct conversation.

We distinguish between flexibility — which we actively support — and unreliability, which undermines team trust and collaboration. Employees who need to adjust their schedule temporarily for personal reasons are encouraged to communicate this to their manager rather than simply being unavailable without notice.