

NovaMente Soluções Cognitivas

Document 11 — Anti-Discrimination & Diversity Policy

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Introduction

NovaMente is committed to building and sustaining a workplace that is genuinely inclusive — one in which every person, regardless of their background, identity, or circumstances, can contribute fully and grow professionally. This is not a policy document that exists to satisfy a compliance requirement. It reflects a sincere conviction that diverse teams make better decisions, build better products, and create more resilient organizations.

This document defines NovaMente's commitments in the areas of anti-discrimination, diversity, equity, and inclusion. It describes the protected characteristics recognized by this policy, the types of conduct it prohibits, the specific initiatives NovaMente undertakes to advance an inclusive culture, and the accountability mechanisms that ensure these commitments translate into action.

All employees, managers, contractors, and members of the leadership team are subject to this policy. Violations are treated with the same seriousness as violations of any other conduct standard at NovaMente.

Protected Characteristics

NovaMente prohibits discrimination and harassment on the basis of any of the following characteristics: race and ethnicity; color; national origin or nationality; gender and gender identity; sexual orientation; age; religion or belief; disability, whether physical or mental; pregnancy and maternity status; marital or civil union status; socioeconomic background; political opinion, where not in conflict with professional obligations; and any other characteristic protected by applicable Brazilian law or by NovaMente's own values.

This list is intended to be comprehensive rather than exhaustive. If a situation arises that involves a characteristic not explicitly listed here, NovaMente will evaluate it through the lens of its values — specifically, whether the treatment in question respects the fundamental dignity of the person involved.

Prohibited Conduct

The following types of conduct are strictly prohibited at NovaMente and will result in disciplinary action, up to and including immediate termination.

Direct Discrimination

Treating a person less favorably than another in a comparable situation because of a protected characteristic. This includes decisions about hiring, promotion, assignment, compensation, access

to development opportunities, and termination that are influenced by any of the protected characteristics listed above.

Indirect Discrimination

Applying a policy, practice, or requirement that appears neutral but places people with a particular protected characteristic at a disadvantage, without legitimate justification. NovaMente actively reviews its policies and practices to identify and correct indirect discrimination, even when it is unintentional.

Harassment

Unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. Harassment may be verbal, physical, visual, or digital. A single incident of severe harassment is sufficient to constitute a violation — harassment does not require a pattern of behavior.

Sexual Harassment

Any unwanted conduct of a sexual nature, including verbal, physical, or digital conduct. This includes unwanted physical contact, sexual comments or jokes, displaying sexually explicit material in the workplace, and any implicit or explicit suggestion that professional opportunities are conditional on tolerating or participating in sexual conduct. NovaMente treats sexual harassment with particular seriousness and investigates all reports as a matter of priority.

Victimization and Retaliation

Treating a person less favorably because they have made or supported a complaint under this policy, participated in an investigation, or exercised any right protected by this policy. Retaliation is a serious violation in its own right, independent of the underlying complaint.

Our Diversity and Inclusion Commitments

Prohibiting discrimination is necessary but not sufficient for building an inclusive organization. NovaMente makes active, concrete commitments to diversity and inclusion across the employee lifecycle.

Recruitment and Hiring

We design every hiring process to minimize the influence of bias. This includes writing inclusive job descriptions, sourcing from diverse channels, using structured interviews with standardized questions, and training all interviewers on unconscious bias. We track diversity metrics across our candidate pipeline and among new hires, and we hold ourselves accountable when those metrics show gaps we have not addressed.

Compensation Equity

NovaMente conducts a biannual pay equity audit to identify and correct compensation gaps related to gender, race, or other protected characteristics. Where gaps are identified, they are addressed in the following compensation review cycle. Results of the equity audit are shared with the COO and board, and action plans are documented and tracked.

Advancement and Development

We track representation across career levels and identify departments or functions where certain groups are underrepresented in senior roles. Where we find these patterns, we examine the causes — including whether development opportunities, sponsorship, and promotion criteria are being applied equitably — and we take targeted action to address them.

Inclusive Culture Practices

Beyond formal processes, NovaMente invests in building the everyday conditions of inclusion. This includes facilitated conversations on diversity topics in all-hands and team settings, norms around meeting facilitation that ensure all voices are heard, manager training on inclusive leadership, and an annual all-company survey that explicitly measures how included employees feel and how that experience varies across different groups.

Accommodation and Accessibility

NovaMente makes reasonable accommodations for employees with disabilities, religious practices, or other needs that can be met without disproportionate burden to the company. Accommodation requests are handled by the HR & Culture team in a confidential and constructive manner. Employees who need accommodations are encouraged to raise them early so that solutions can be identified and implemented without delay.

Accountability

Commitments without accountability are aspirations. NovaMente holds itself accountable to the commitments in this policy through the following mechanisms.

Annual DEI Report. The HR & Culture team produces an annual Diversity, Equity & Inclusion report that documents representation across departments and levels, pay equity findings, hiring pipeline metrics, and the outcomes of key DEI initiatives. The report is shared with all employees at the January all-hands.

Inclusion Survey. The annual values audit includes a dedicated section on inclusion, measuring how included employees feel and whether their experience varies by demographic group. Results are disaggregated and reviewed carefully for patterns that require attention.

Leadership Accountability. Department heads and managers are evaluated in part on the inclusivity of their teams and their adherence to equitable practices. A leader who produces results through practices that exclude or harm members of their team is not performing well at NovaMente, and this is reflected in their own performance evaluation.

Complaints and Investigation. All complaints related to discrimination or harassment are investigated promptly and independently. Outcomes are communicated to the complainant, and corrective actions are implemented without delay. The HR & Culture team maintains a confidential record of all complaints and their outcomes, which is reviewed quarterly to identify any patterns.

How to Raise a Concern

Any employee who believes they have experienced or witnessed discrimination, harassment, or any other violation of this policy should report it as soon as possible through one of the following channels: directly to the HR & Culture team; to the COO, if the concern involves the HR team; or through the anonymous reporting tool available in the internal knowledge base.

All reports are taken seriously and investigated confidentially. NovaMente does not require employees to prove their experience before reporting — if something felt wrong, we want to know about it. We also recognize that some employees may hesitate to report for fear of not being believed or of facing consequences. We are committed to ensuring that neither of those fears is warranted.