



Public Benefit Corporation Report 2024

Enhanced Transparency Environmental Social Governance Private Companies Contributory Database Portfolio Companies Data Benchmarking Metric Library Expansion Advancing a Standards-Based Metric Library Tagging and Taxonomy Framework and Standard Coverage Refining Novata Guidance Supporting Data Input Data Cleaning Metric Editing Guardrails

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I. Executive Summary

As a Delaware Public Benefit Corporation, Novata is steadfast in its commitment to promoting transparency in ESG reporting across the private markets. Through our advanced technology platform, extensive metric library, and client-centric services, we empower private market participants to measure and manage their sustainability performance.

Our purpose is embedded in our operations, and our work has enabled thousands of companies to engage more meaningfully with sustainability data.

Since our last report, Novata has significantly scaled its reach, impact, and infrastructure. Our platform now supports over 10,000 companies, with sustainability metric submission volumes in Q1 2024 exceeding the total for all of 2023. Our data metric library has grown substantially, now offering more than 3,000 curated metrics.

To support our users, we've launched transformative tools like the Carbon Navigator to help companies track and manage their carbon impact. Meanwhile internally, our stakeholder engagement continues to grow, underpinned by our employee-centric culture, client onboarding programs, and public educational content.

This report highlights our journey, progress, and plans reflecting our unwavering focus on building a more sustainable, inclusive, and transparent private market ecosystem.

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Novata meets our clients at every stage of their sustainability journey. This enables companies to operate more responsibly and investors to better assess risk and long-term value.

Alex Friedman
CEO, Novata

II. Our Commitments

As a Public Benefit Corporation, Novata's charter objectives are to:

01

Provide enhanced transparency of the environmental, social, and governance attributes of private companies through the creation of a contributory database for private equity managers and their portfolio companies.

02

Provide access to reliable high-quality, standardized environmental, social, and governance data that can be used for benchmarking analyses.

03

Make improvements in ESG programs at private companies.

III. Performance Against Public Benefit Objectives

01 Build & Maintain a Contributory ESG Database for
Private Markets

3,029

Total Library Metrics by End of 2024

02 Enable ESG Benchmarking with High-Quality,
Reliable & Standardized Data

12,439

Benchmarks Released in 2024

03 Support ESG Improvement

75.47%

Metric Completion Rate

01 Build & Maintain a Contributory ESG Database for Private Markets

CHARTER OBJECTIVE 01

Provide enhanced transparency of the environmental, social, and governance attributes of private companies through the creation of a contributory database for private equity managers and their portfolio companies.

HOW WE FULFILL THIS OBJECTIVE

Novata's progress against this objective is demonstrated through its ongoing investment in:

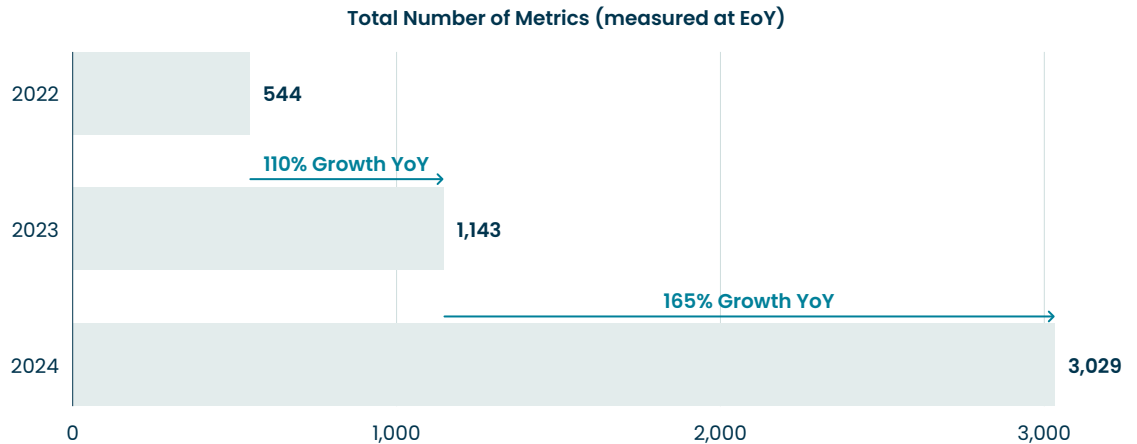
- **Metric Library Expansion**
Continuously adding metrics to capture evolving ESG needs.
- **Advancing a Standards-Based Metric Library**
Aligning metrics with global standards and frameworks (e.g., GRI, SASB, IFRS, GHG Protocol).
- **Tagging and Taxonomy**
Ensuring every metric is searchable and categorized for relevance.
- **Framework and Standard Coverage**
Ensuring the platform is interoperable across leading ESG systems.
- **Refining Novata Guidance**
Establishing well researched and empirically supported guidance pages for Novata Metrics.

METRICS WE USE TO MONITOR THIS OBJECTIVE

These metrics are designed to capture both the scale, growth, and sophistication of Novata’s ESG data. Tracking the total number of library metrics and year-over-year growth provides a quantitative measure of coverage, while the addition of unique tags, average tags per metric, and guidance coverage reflects qualitative depth and usability. Standards and framework adoption serve as leading indicators of interoperability, ensuring that the database remains aligned with global disclosure trends and private market expectations. Collectively, these measures allow us to demonstrate not only growth, but also the precision and credibility of Novata’s database—cornerstones of its long-term utility to private market participants.

METRIC	RESPONSE	RELEVANCE
Number of Metrics (Total)	3029 Total Library Metrics by End of 2024	Demonstrates breadth and extensiveness of the ESG database.
Number of New Metrics (Annual)	1886 Added in 2024	Reflects continual expansion and responsiveness to ESG evolution.
YoY Growth (%) in Number of Metrics in the Novata Metric Library	165% (2023–2024)	Shows acceleration of metric development.
Average Number of Tags, by Metric	5.7	Indicates high taxonomic precision, enabling search, benchmarking, and categorization.
Number of Unique Tags	349	Demonstrates database richness and topic diversity.
Advancement of Novata Guidance	79% of all Novata Library Metrics have industry-leading guidance 95% of all Novata Library Metrics were reviewed for completeness and clarity in 2024	Highlights Novata’s focus on our end-user as well as our team’s investment in metric and guidance development.
Number of Standards Supported on Platform	4	Standards-based Metrics allow us to foster the greatest sense of interoperability across contexts.
Number of Frameworks Supported on Platform	16 Sustainability Frameworks and Regulations	Framework flexibility ensures library relevance across multiple reporting contexts.

DATA ANALYSIS



NARRATIVE ASSESSMENT

While the Novata Metric library has grown in terms of the depth and breadth of the metrics we carry, our Metrics & Guidance team has emphasized a need for a standard-centric approach. Driven by global standards setting organizations like Global Report Initiative (GRI) and the International Sustainability Standards Board (ISSB), this shift has allowed Novata to license and support the most recognized and used sustainability metrics and reporting systems in the world. This effort has brought clarity, consistency, and interoperability to an increasingly complex global landscape. The Novata Metric Library includes over 3,000 metrics aligned with widely recognized standards and regulations—including ISSB, SASB, GRI, CSRD, SFDR, and TCFD—making it easier for users to identify meaningful, comparable, and investor-relevant data points. By grounding our platform in standards, we empower investors to establish measurable baselines for portfolio companies, objectively compare data across regions and sectors, and adapt with confidence as regulations continue to evolve.

We center everything we do around the client experience and ease of use— ensuring that sustainability reporting is approachable, actionable, and aligned with what matters most. That’s why we prioritize user-friendly, expert-driven guidance to ensure the metrics our clients select are not only aligned with regulatory expectations but also relevant and material to their specific business context. Our guidance is continuously updated to reflect changes in the global regulatory landscape and to improve overall usability. Our goal is to make sustainability reporting easier to navigate, ensure alignment with evolving standards, and help our clients respond effectively and efficiently to stakeholder demands and regulatory requirements.

As part of our commitment to simplifying sustainability reporting, we’ve introduced new product features like the Workforce Module to help ease the reporting burden around often complex and sensitive workforce metrics. Novata continues to prioritize workforce-related data for which investor demand for insights on metrics like gender representation, employee engagement, and hiring trends continues to grow. Metrics like turnover rates, net new hires, and the representation of women in leadership positions are consistently among the top 30 most requested by investors, underscoring the importance of transparent and actionable human capital reporting.

02 Enable ESG Benchmarking with High-Quality, Reliable & Standardized Data

CHARTER OBJECTIVE 02

Provide access to reliable high-quality, standardized environmental, social, and governance data that can be used for benchmarking analyses.

HOW WE FULFILL THIS OBJECTIVE

Novata's progress against this objective is demonstrated through its ongoing investment in:

- **Supporting Data Input**
Supporting data input by offering clients consistent, validated data through structured guidance and version control.
- **Data Cleaning**
Developing and supporting intensive data cleaning processes to ensure high quality outputs.
- **Metric Editing**
Maintaining data integrity and continuity with a rigorous metric editing process.
- **Guardrails**
Implementing guardrails to reduce data errors at the point of submission.
- **Provide Platform Access to Review and Search Benchmarks**
Providing clients with benchmarks.
- **Ensuring Data Integrity**
Implementing the Workforce Module (WFM) to assist users in generating responses of high data quality.

METRICS WE USE TO MONITOR THIS OBJECTIVE

These metrics demonstrate the maturity, relevance, and comparability of Novata’s benchmarking capabilities. Growth in the number of benchmarks not only signals the scale of available analyses, but also reflects the pace at which users are engaging with metrics, the robustness of the underlying library, and the increasing maturity of our dataset. The expansion of universal benchmarks highlights our progress toward cross-sector standardization, enabling consistent comparisons across diverse industries and geographies. Together, these measures provide evidence that Novata benchmarks are both reliable and decision-useful—allowing companies and investors to contextualize performance, identify gaps, and drive improvements with confidence.

METRIC	RESPONSE	RELEVANCE
Number of Total Benchmarks	12,439 Benchmarks Released in 2024* *see table on the next page for more insights	The size and depth of Novata’s benchmarks demonstrate our abilities to collect client data and standardize data collection across sectors, industries, and geographies.
Number of Universal Benchmarks	200	Increasing the number of universal benchmarks indicates greater dataset standardization and enables broader cross-sector comparisons, improving utility across clients and industries.
Number/Percent of SICs® Sectors Addressed	11 (100%)	Complete coverage across all SICs® sectors demonstrates that the benchmark set spans the full spectrum of sustainability-relevant business groupings as defined by SASB. It ensures representation of every high-level sustainability domain.
Number/Percent of SICs® Industries Addressed	77 (66%)	Extensive coverage across SICs® industries demonstrates the breadth of Novata’s client base. Specificity across industries allows companies to compare their progress against peers most relevant to them, while doing so in a standardized way.

Benchmark Breakdown 2024 RELEASE

Total Benchmarks **12,439**

Universal Benchmarks	200
Total Non-Normalised	169
Total Normalised by FTE	16
Total Normalised by Revenue (\$M)	15

Sector Benchmarks	1,475
Total Non-Normalised	951
Total Normalised by FTE	268
Total Normalised by Revenue (\$M)	256

Sub-Sector Benchmarks	2,274
Total Non-Normalised	1,427
Total Normalised by FTE	438
Total Normalised by Revenue (\$M)	409

Industry Benchmarks	2,098
Total Non-Normalised	1,307
Total Normalised by FTE	411
Total Normalised by Revenue (\$M)	380

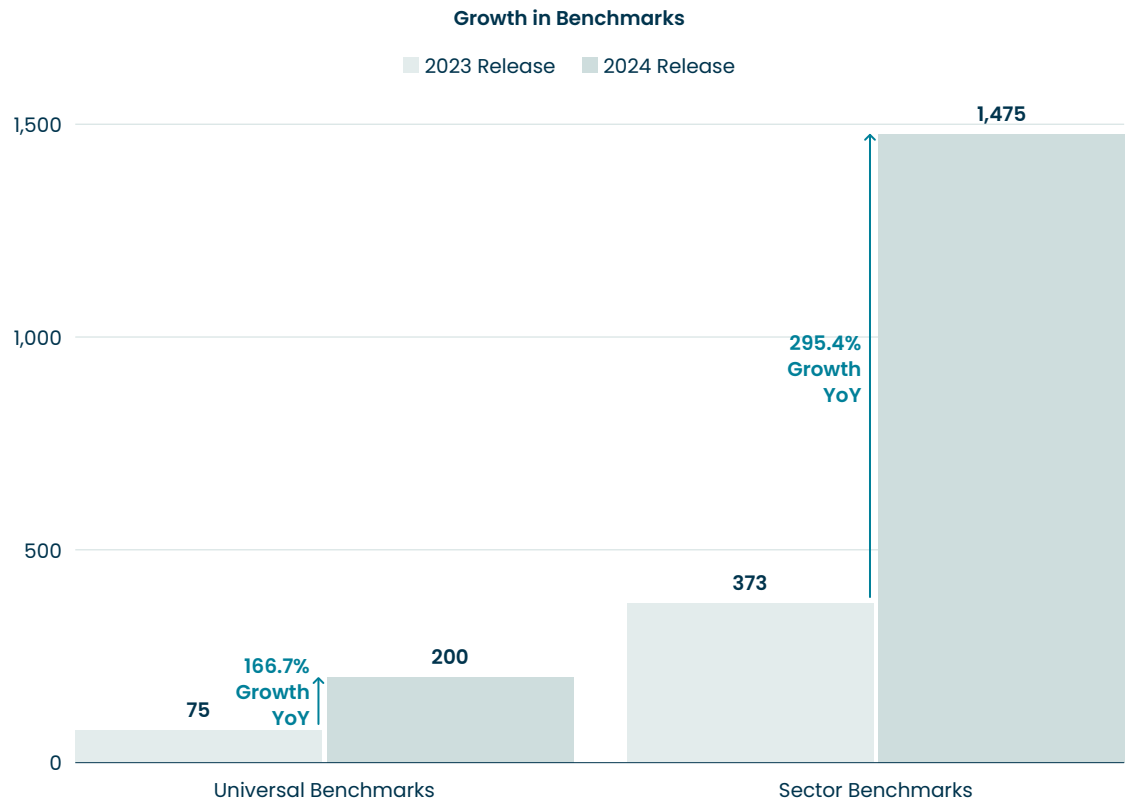
Geography Specific Benchmarks	5,875
APAC Benchmarks	168
Total Non-Normalised	100
Total Normalised by FTE	36
Total Normalised by Revenue (\$M)	32

Europe Benchmarks	2,505
Total Non-Normalised	1,557
Total Normalised by FTE	488
Total Normalised by Revenue (\$M)	460

North America Benchmarks	3,202
Total Non-Normalised	2,086
Total Normalised by FTE	578
Total Normalised by Revenue (\$M)	538

GP Benchmarks	517
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DATA ANALYSIS



NARRATIVE ASSESSMENT

Novata Benchmarks are based on a data set of more than 70,000 data points contributed by thousands of private companies representing all 11 sectors in the Sustainable Industry Classification System.

We employ quantitative analysis and qualitative judgment to create robust, anonymized performance indicators. Data used in Novata Benchmarks is actual reported data from Novata contributors, de-identified and aggregated, and specific to the private markets.

We use both statistical analysis and the expertise of our internal experts to select and publish benchmark data. This includes reviewing data quality, achieving a minimum number of underlying data points/metric, and testing for variance across multiple dimensions.

For each benchmark, we provide underlying details so users can easily and confidently assess performance. Details include: count of contributing companies, fill rates, last update, geographic biases within the dataset, quartile values, and company size distribution.

Novata users can access benchmarks in the platform to easily compare performance to the market or a sector, and gain clear insights into where their companies might under- or over-perform relative to their sustainability strategy. We encourage users to leverage these insights to manage risk, take action, and communicate value.

03 Support ESG Improvement

CHARTER OBJECTIVE 03

Make improvements in ESG programs at private companies.

HOW WE FULFILL THIS OBJECTIVE

Novata's progress against this objective is demonstrated through its ongoing investment in:

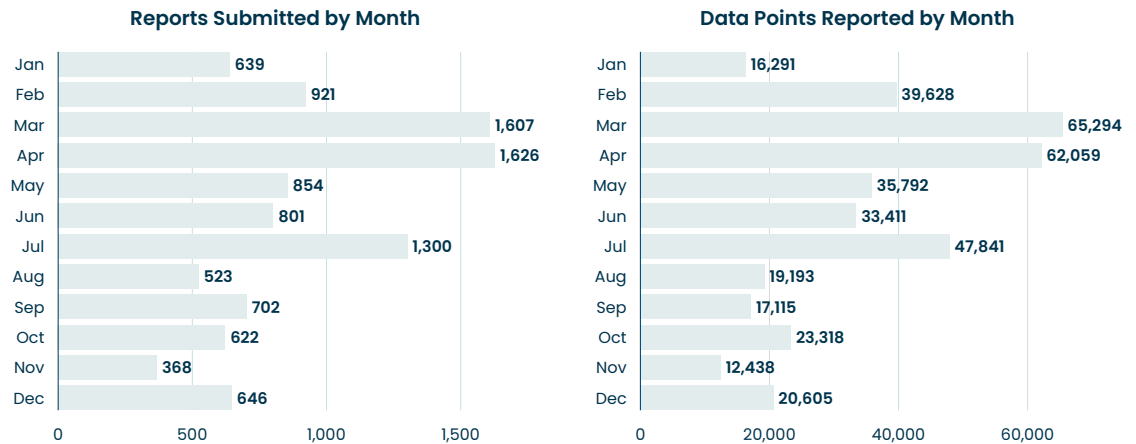
- **Market-Leading Tools and Methods of Data Collection and Calculation**
Providing clients with market-leading tools and methods of data collection and calculation, like Carbon Navigator.
- **Platform Experience**
Supplementing platform experience and enhancing ESG strategy through platform and partnerships with Novata Advisory.
- **Webinars, Training, Onboarding, and Education**
Delivering webinars, training, onboarding, and education to enhance capacity-building.
- **Provide Expert Insight**
Providing expert insight into ESG reporting through our educational offerings, content, and programming.

METRICS WE USE TO MONITOR THIS OBJECTIVE

These metrics monitor ESG improvement and are designed to evaluate both client adoption and impact. High completion rates and large volumes of reports and data points signal not only engagement, but also the integrity and comprehensiveness of client disclosures. Uptake of specialized tools such as the Carbon Navigator indicates deepening sophistication in emissions management, while growth in webinars, knowledge base resources, and content downloads reflects the expansion of client capacity and fluency. Collectively, these measures assess the extent to which Novata’s platform is driving behavioral change, equipping companies with actionable insights, and enabling measurable improvements in ESG performance across the private markets.

METRIC	RESPONSE	RELEVANCE
Metric Completion Rate	75.47%	A high metric completion rate indicates that users are engaging with data collection in meaningful ways, and helps to ensure that investors are receiving complete and accurate information from their portfolio companies. This metric is reflective of data quality, usability of the platform, and gives us great confidence that Novata’s benchmarks are rigorous and trustworthy.
Report Completion Rate	86.67%	A high report completion rate indicates that users are completing reports in a comprehensive manner by answering a high percentage of the metrics included. This metric is reflective of the breadth and completeness of disclosure at the report level, and gives us great confidence that the information submitted represents a holistic and comparable view of ESG performance across companies.
Number of Reports Submitted in 2024	10,609	This metric reflects platform usage at scale, with over 10,000 submissions indicating robust adoption and broad participation in structured ESG reporting across the user base.
Total Data Points Submitted in 2024	265,721	A high volume of submitted data points demonstrates the richness and granularity of the platform’s ESG dataset. It enhances benchmark quality, supports detailed analysis, and enables deeper insights across metrics and sectors.
Number of Carbon Navigator Users Added in 2024	1,742	Adoption of the Carbon Navigator tool signals growing interest in emissions tracking and decarbonization planning. New users reflect increased client demand for climate-specific workflows and analytics.
Number of Knowledge Base Articles Created	29 Added	New articles expand user support infrastructure, helping clients navigate ESG complexities and platform features. Growth in this area reduces friction, improves self-service, and contributes to long-term user success.
Number of Webinar Registrants	1,444	Live webinars serve as a strategic channel for client education and engagement, reinforcing Novata’s position as a trusted authority in ESG. Consistently high attendance—averaging over 200 participants per session—demonstrates strong market demand for expert-led guidance and affirms the value of Novata’s thought leadership programming.
Number of Content Downloads	2,139 Content Downloads of Guides and eBooks	The creation and uptake of downloadable content demonstrates demand for in-depth ESG guidance. High download volumes signal content relevance and Novata’s role in thought leadership, especially during onboarding and reporting cycles.

DATA ANALYSIS



NARRATIVE ASSESSMENT

As sustainability expectations accelerate across private markets and the regulatory landscape, Novata plays a central role in enabling private companies to mature their ESG programs with confidence, clarity, and credibility. We recognize that meaningful ESG improvement starts with informed action—grounded in accurate data, supported by expert guidance, and delivered through tools that empower internal teams rather than overwhelm them.

Our platform is intentionally designed not only to facilitate data collection, but to help our clients interpret and act on what that data means. Through innovative product offerings like Carbon Navigator, companies gain access to practical methodologies for estimating and managing their carbon footprint—even if they are early in their sustainability journey. Tools like these allow ESG leaders and operational teams to build emissions literacy internally, prioritize action, and align their disclosures with frameworks such as the ISSB and TCFD.

This technical foundation is reinforced by a robust support ecosystem built to develop ESG fluency and operational readiness. From onboarding and training sessions to a growing library of Knowledge Base articles, eBooks, and guides, we provide actionable insights that demystify ESG reporting and enable companies to embed sustainability into their core business practices. Our webinar program, which attracts hundreds of registrants per session, and our partnerships with advisory firms further strengthen our capacity-building model—ensuring that clients are equipped not only to disclose data, but to drive progress.

Platform usage metrics affirm this impact. With over 10,000 reports submitted and more than 265,000 data points captured in 2024 alone, clients are engaging deeply and consistently with the resources we provide. A metric completion rate above 75 percent reflects meaningful follow-through, indicating that users are not only initiating disclosures but producing comprehensive, decision-useful outputs. These submissions contribute to a rapidly expanding benchmark dataset that allows companies to compare performance, identify gaps, and define relevant ESG priorities based on peer behavior and materiality.

Novata’s approach to ESG improvement is grounded in long-term partnership. We meet companies where they are, support them with the right mix of technology and insight, and enable them to translate ESG reporting into informed, strategic action. By aligning our platform experience with education, advisory access, and a standards-based methodology, we help private companies build the capacity and confidence to lead on sustainability.

IV. Novata's ESG Commitments & Progress

E

Environment

S

Social

G

Governance & Stakeholder Accountability

E Environment

OVERVIEW

At Novata, we use our own reporting platform and carbon collection tools to track and measure our environmental impact. Our Environmental, Social, and Governance Policy outlines clear commitments across our business. Environmentally, we strive to minimize our footprint by operating a cloud-based model with limited physical infrastructure, supporting remote work to reduce travel-related emissions, and partnering with organizations that demonstrate strong sustainability performance.

These principles also inform our product development. We design our software to help companies measure, manage, and report ESG data with accuracy and integrity, aligning with leading global standards. By continuously innovating to meet evolving regulatory and stakeholder expectations, we not only support our customers' ESG journeys but also model the kind of responsible business practices we seek to enable.

In our latest emissions inventory, we reported 4 mtCO₂e of Scope 1 emissions, 12 mtCO₂e of Scope 2 emissions (market-based), and 954 mtCO₂e Scope 3 emissions—reflecting our current office-based operations and limited physical footprint. These totals serve as an important starting point for building an emissions reduction roadmap and engaging suppliers in collaborative data collection. We have adopted an environmental policy that outlines principles for responsible energy use, supplier due diligence, and continuous improvement. Future initiatives will focus on strengthening internal tracking systems, integrating emissions criteria into vendor selection, and setting proportional reduction targets. As our sustainability program matures, we remain committed to transparency, accountability, and alignment with leading climate disclosure standards.

4

mtCO₂e of Scope 1 emissions

12

mtCO₂e of Scope 2 emissions

954

mtCO₂e of Scope 3 emissions

S Social

OVERVIEW

At Novata, we believe our people are our greatest asset. Every employee plays a meaningful role in driving our growth, innovation, and mission forward—and we are committed to creating a workplace where our team members feel supported, valued, and empowered to succeed. Novata promotes shared responsibility and inclusion by encouraging employee feedback and participation in organizational initiatives. Regular employee engagement surveys, leadership accessibility, and transparent communications contribute to a culture of collaboration and trust.



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ATTRACTING & SUPPORTING TOP TALENT

We strive to hire and retain best-in-class talent. From recruitment through professional development, we foster a culture where every employee can thrive. Our leadership team reflects our commitment to diversity: as of December 31, 2024, our management team included seven leaders—four of whom identify as women. We continue to strengthen our worker-related policies, prioritize diverse backgrounds in our hiring practices, and provide inclusivity training to all employees.

**CULTIVATING
COMMUNITY
THROUGH
ERGS**

Mentorship and inclusion are essential to how we build culture. Our **Employee Resource Groups (ERGs)** create opportunities for connection, support, and leadership development. As of the end of 2024, our ERGs included:

- Black Employee Group
- LGBTQIA+ Pride
- Parents and Caregivers Network
- Women's Network
- Multicultural Group

These groups help foster belonging and engagement across our organization.

**POLICIES THAT
SUPPORT
PEOPLE**

We know that supporting employees means recognizing the realities of life outside of work. That's why we offer family-friendly policies designed to promote work-life balance. These include generous vacation allowances, parental leave for primary and secondary caregivers, as well as additional days off for volunteering.

Novata is committed to upholding a globally consistent approach to fairness in compensation and conducts regular external and internal market benchmarking to ensure that compensation levels remain aligned with industry standards and location-specific expectations. Our Pay Equity Policy extends to both new hires and internal reviews, helping maintain fairness and competitiveness across all roles and geographies.

Our comprehensive benefits package reflects our belief in holistic well-being—for employees and their families. These benefits give our team the flexibility and resources they need to care for themselves and their loved ones, without sacrificing their careers.

**COMMITMENT
TO GROWTH**

We invest in our employees' continuous learning and professional development. All employees complete mandatory training, with optional offerings that span both technical and personal development topics. These programs are designed to build relevant skills, encourage innovation, and support long-term career growth.

LISTENING & ACTING ON EMPLOYEE FEEDBACK

We view employee feedback as essential to building a strong and responsive culture. In 2024, 88% of employees participated in our annual employee survey. We analyzed the results by department and demographic to identify key themes and benchmark our progress. We communicated the findings transparently and held team-specific discussions, leadership Q&As, and feedback sessions to turn insights into action.

We followed up with targeted action plans, setting clear goals and assigning ownership to ensure progress. Recognizing and celebrating teams who drive engagement is part of how we reinforce positive change. At Novata, employee engagement is an ongoing priority, not a one-time initiative.

88%

of employees participated in our 2024 annual employee survey

EMPLOYEE RECOGNITION

In 2024 we launched a new recognition program, “Celebrating Excellence: Supernova Spotlight” to honor and celebrate when Novatans exemplify our values by going beyond their everyday roles to make a positive impact.

Each quarter, Novatans nominate their colleagues who have demonstrated exceptional dedication, kindness, and innovation. These nominations not only highlight individual achievements but also inspire a culture of appreciation and excellence within our organization.

The outstanding individuals are recognized in all team communications and receive a monetary reward to celebrate their contributions.



G Governance & Stakeholder Accountability

OVERVIEW

Good governance is at the heart of Novata's approach to sustainability, as well as its ability to achieve its mission of enhancing transparency of material sustainability attributes of private companies through the Novata Platform, as well as providing those companies with reliable high-quality sustainability data. Without a strong system of policies and practices to keep a company accountable for its actions, it is not possible for it to operate in the best interest of its stakeholders. To ensure the success of all of Novata's stakeholders and our mission, we have prioritized governance since inception. This is evidenced through our commitment as a public benefit corporation, certified B corp, our board composition, security practices, robust legal and ethics policies, as well as how we ensure compliance with those policies across our operations.



We have prioritized governance since inception... evidenced through our commitment as a public benefit corporation, certified B corp, our board composition, security practices, robust legal and ethics policies.

COMMITMENTS & ACCOUNTABILITY MECHANISMS

Novata selected the B Corp standard, a performance based standard, as the right marker for demonstrating our commitment to a more inclusive form of capitalism.

Novata embarked on the rigorous B Corp certification process in 2023, with a validated score of 102.9, exceeding the threshold of 80 points needed to qualify. B Lab, the nonprofit which manages the standard, is the nonprofit network transforming the global economy to benefit all people, communities, and the planet. This designation means Novata has reached the highest standards of verified social and environmental performance, public transparency and legal accountability to balance profit and purpose.



Overall B Impact Score

Novata's Score	102.9
Qualifies for B Corp Certification	80
Median Score for Ordinary Businesses	50.9

INTERNAL POLICIES & CORPORATE GOVERNANCE

Novata maintains a rigorous framework of internal governance that ensures ethical conduct and regulatory alignment across all operations. Core policies—including those addressing anti-bribery, conflicts of interest, fair competition, and data privacy—are codified in our corporate Code of Conduct, which is reviewed and acknowledged by employees as part of the onboarding process. Annual training cycles reinforce these standards, equipping staff with the knowledge and tools necessary to meet evolving compliance expectations.

Oversight of environmental, social, and governance (ESG) practices is embedded at the executive level. A cross-functional ESG committee—composed of senior leadership across finance, legal, and operations—meets regularly to review regulatory updates, assess internal risk exposure, and ensure ESG principles are fully integrated into company decision-making. This structure ensures sustained accountability and alignment with recognized best practices.

**TRANSPARENCY
& OVERSIGHT**

Transparency is a central pillar of Novata's governance model. Employees and stakeholders have access to secure, confidential channels for reporting suspected misconduct, supported by a non-retaliation policy and a formal process for review and resolution. Incidents are managed with clear documentation requirements and tracked to closure by responsible compliance personnel.

The company's operational oversight extends to third-party relationships, with due diligence procedures applied to all vendors and suppliers. These mechanisms support both internal integrity and external accountability, ensuring risks are identified, escalated, and addressed with clarity and consistency.

Novata is committed to fostering a workplace environment that prioritizes fairness, equity, and human dignity. Our employment practices prohibit discrimination of any kind, and our workplace conduct policy clearly outlines expectations regarding harassment prevention and employee well-being. A structured grievance mechanism provides all employees with accessible avenues to raise concerns, supported by clearly defined resolution procedures.

Novata promotes shared responsibility and inclusion by encouraging employee feedback and participation in organizational initiatives. Regular employee engagement surveys, leadership accessibility, and transparent communications contribute to a culture of collaboration and trust.



Novata is committed to fostering a workplace environment that prioritizes fairness, equity, and human dignity.

**INFORMATION
SECURITY
& DATA
PROTECTION****Our Approach to Data Governance**

At Novata, data governance is integral to our responsible use of technology, particularly artificial intelligence. Our Responsible AI Use Policy is closely aligned with our broader data governance framework, which encompasses Data Protection, Classification, Retention, and Encryption policies. This alignment ensures that any use of sensitive or high-risk data complies with clearly defined standards. AI-related software and tools are tracked through structured inventories maintained under our Software Development Life Cycle (SDLC) and Vendor Management policies. We conduct formal risk assessments annually, incorporating impact evaluations, treatment plans, and predefined thresholds, as outlined in our ISO 27001-aligned Information Security Management System (ISMS) Plan and Risk Assessment Policy. Oversight and accountability are further embedded through a designated Responsible AI Team—including the COO, CTO, and CLO—which ensures risks are mapped, measured, and managed effectively.

Our Approach to Security

Security at Novata is governed by a comprehensive set of policies and procedures designed to protect data, ensure compliance, and manage risk throughout the lifecycle of our systems. Our Information Security Policy and Risk Assessment Policy are informed by legal counsel and regularly reviewed to align with regulatory frameworks such as GDPR, CCPA, and LGPD. Risk assessments are performed annually in accordance with ISO 27001:2022 and SOC 2 Type 2 standards, with outcomes tracked and mitigated via Jira. AI system performance and trustworthiness—including concerns such as bias and security vulnerabilities—are monitored within our standard SDLC and vulnerability management processes. Access to generative AI tools is controlled, requiring internal approval and human review of all outputs, particularly in customer-facing contexts. Personnel are trained annually on both information security and AI usage guidelines, with policy acknowledgments tracked to ensure ongoing awareness and compliance. [O](#)



AI-related software and tools are tracked through structured inventories maintained under our Software Development Life Cycle (SDLC) and Vendor Management policies.

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