

NOS

2024
INTEGRATED ANNUAL REPORT









This report is a translation of the Portuguese original version of the Annual Integrated Report 2024 of NOS, SGPS, S.A., disclosed on 14 March 2025 on CMVM's website and on NOS' institutional website, in ESEF format. In case of discrepancies between this version and the official ESEF version, the latter prevails.



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04

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01

WE PLACE THE FUTURE

AT THE SERVICE OF SOCIETY

INTEGRATED MANAGEMENT REPORT

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1.1.1 Letter from the CEO

Reflecting on a Decade of Growth and a Year of Record Achievement

As I look back on the past year, I do so with immense pride and gratitude. In 2024, we marked the 10th anniversary of NOS—a decade of transformation, innovation, and leadership in Portugal's communications, technology, and entertainment sectors. This milestone is not just a celebration of time passed but a reflection of the extraordinary journey we have undertaken together.

When we embarked on this path in 2014, we set out with a clear vision: to unite two leading players in the Portuguese telecom market and build a company positioned to drive the next wave of convergent growth. Ten years later, our ambition, strategic focus, and relentless execution have established NOS as an undisputed market leader.

2024 was a record-breaking year in many ways. We reinforced our leadership in 5G, achieving the largest coverage, highest quality, and fastest deployment of any operator in Portugal—achievements independently recognized at both national and European levels. We accelerated the expansion of our FTTH



coverage, providing 5.7 million households with cutting-edge connectivity. Our digital transformation programs advanced rapidly, enhancing customer interfaces and transactional platforms to improve interactions and deliver a more seamless and personalized experience. And, driven by our commitment to technological leadership, customer experience, and operational excellence, we increased our market share to nearly 32%[1], achieving our strongest year ever in revenue growth, profitability, and cash generation.

"We reinforced our leadership in 5G, achieving the largest coverage, highest quality, and fastest deployment of any operator in Portugal."

Looking Ahead: A New Cycle of Innovation and Leadership

As we enter a new strategic cycle, we do so in an increasingly complex market environment, shaped by rapid technological disruption and evolving customer expectations. Yet, where there are challenges, there are also immense opportunities.

Our ambition remains clear: to reinforce our leadership in the consumer segment by delivering a differentiated value proposition built on technological superiority and fostering strong, trusted relationships with our customers. At the same time, we are driving disruptive growth in the enterprise segment, positioning NOS as the preferred partner for digital transformation. In line with this strategy, we took a major step toward leadership with the announcement of our acquisition[2] of Claranet Portugal in January 2025. As a leading player in the Portuguese tech sector, Claranet will significantly enhance our ability to deliver cutting-edge technological solutions, enabling real impact transformation for businesses across the country.

A key enabler of our future growth will be the large-scale deployment of AI and advanced digital solutions across all areas of our business. By embedding AI-driven capabilities into every function, we aim to maximize business potential, drive operational efficiency, and establish NOS as a fully AI-enabled organization, ready to meet the demands of an increasingly digital world.

However, what truly sets NOS apart is our people—their expertise, dedication, and ability to navigate constant change. We continue to invest in talent, strengthen leadership development, and foster a culture of continuous learning, ensuring we remain prepared for the challenges ahead. At the same time, we are

"A key enabler of our future growth will be the large-scale deployment of AI and advanced digital solutions across all areas of our business."

[1] According to the latest official data.

[2] The conclusion of this agreement is subject to non-opposition by the Competition Authority.

deepening our commitment to sustainability and social responsibility, reinforcing our Human Rights Policy across our entire ecosystem—employees, partners, suppliers, customers, and the broader community. Our commitment to fighting climate change is also stronger than ever, as reflected in the progress detailed in our sustainability statement later in this report.

"What truly sets NOS apart is our people—their expertise, dedication, and ability to navigate constant change."

Finally, financial discipline and capital optimization remain at the core of our strategy. By ensuring operational efficiency and maximizing returns, we reinforce our market leadership while securing the financial sustainability needed to continue investing in the future and creating long-term value for our shareholders, all our stakeholders, and the country.

With a bold vision, the right strategy, and an exceptional team, I am confident that NOS is ready for this next phase of transformation and growth, and I look forward to continuing this journey with all of you.

Miguel Almeida



1.1.2 NOS in Numbers

Financial KPIs

1,696.3 M€
Consolidated Revenues

+6.2%



767.6 M€
Consolidated EBITDA
EBITDA margin: 45.3%

+7.1%



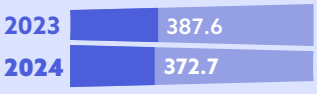
644.9 M€
Consolidated EBITDA AL
EBITDA AL margin: 38.0%

+6.9%



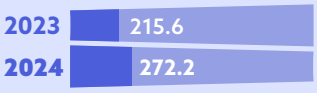
372.7 M€
CAPEX(1)

-3.9%



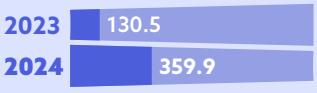
272.2 M€
Consolidated EBITDA AL - CAPEX(1)

+26.3%



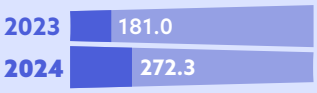
359.9 M€
Free Cash Flow(2)

+175.8%



272.3 M€
Net Income

+50.4%



(1) Excluding Leasing Contracts and Other Contractual Rights.
(2) Total Free Cash Flow Before Dividends, Financial Investments and Acquisition of Own Shares.

912.5 M€
Net Financial Debt

1,087.0 M€
Equity

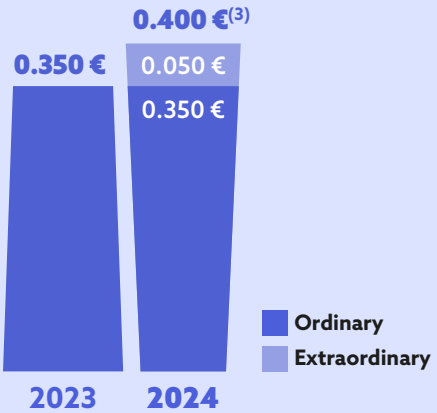
1.41x
Net Financial Debt/ EBITDA AL

BBB –
Rating S&P

BBB
Rating FITCH

3.330€ Price per share at 31 Dec 2024

Dividends per share



(3) Dividend proposal for 2024, approved on 26 February by the Board of Directors and subject to approval at the General Meeting to be held on 12 April 2025.

1.1.2 NOS in Numbers

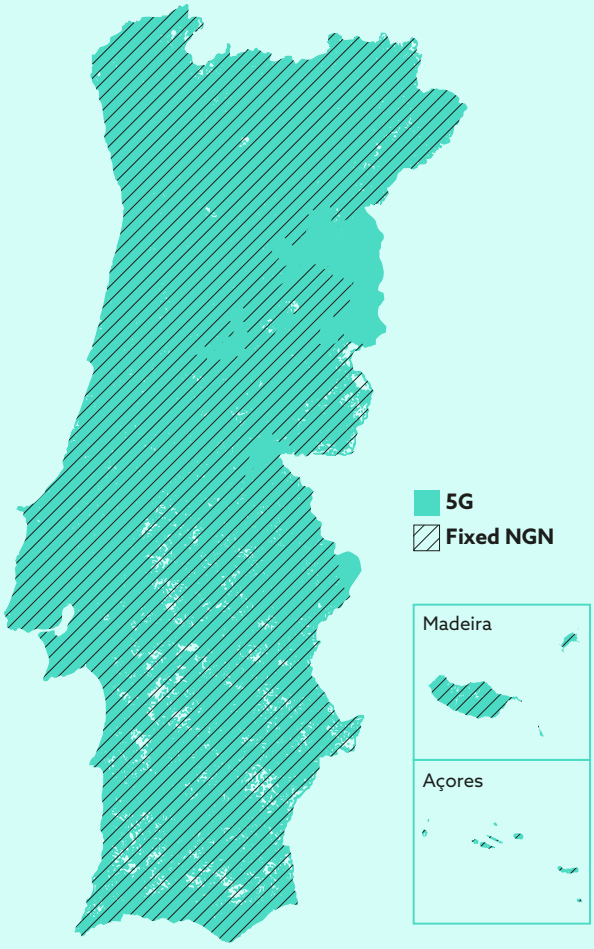
Operating KPIs

We cover the entire national territory with our 5G mobile network and Fixed NGN

99.6%
5G Coverage

5.7 M
Homes Passed with Fixed NGN (+5.5% vs 2023)

82.5%
FttH coverage (+8.2pp vs 2023)



11.4 M
Total RGUs, +3.1% vs 2023

1,192.8 k
Convergent clients

1,677.9 k
PayTV clients

1,583.3 k
Broadband clients

6,195.7 k
Mobile clients

31.5%
Retail revenues market share

35.0%
Convergent subs (Multiple Play) market share

36.1%
PayTV subs market share

33.7%
Broadband subs market share

30.2%
Mobile subs market share

According to latest data published by ANACOM, 9M24

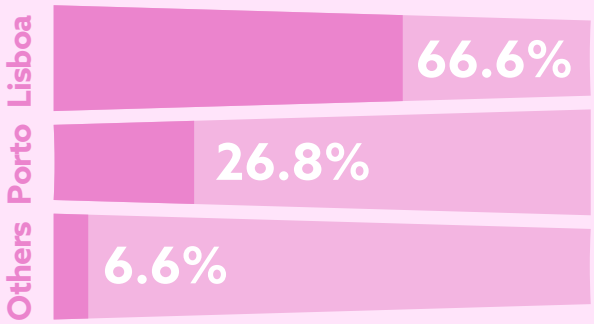
1.1.2 NOS in Numbers

Human Capital

1,827
Employees

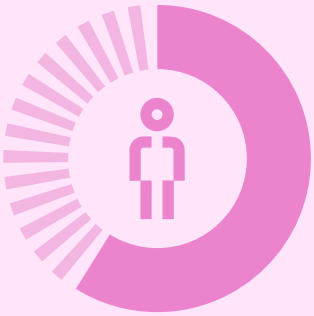
Scope:
all employees except cinema operators, interns, and governing bodies

Geographical distribution

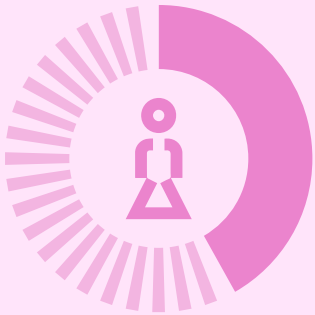


33.8%
% of Women in Management and Top Management Positions

42.9
Employee's Average Age



59%
Men



41%
Women

1.1.2 NOS in Numbers

Environment



99.6%

Waste recovery Rate



50%

Renewable Electricity used to meet the energy consumption of NOS's own operations



-62%

% reduction in energy consumption per Data Traffic (vs 2019)



53%

Customer equipment refurbished for reuse



Ratings

B	58	66
CDP	S&P	Moody's

1.1.3 Key Moments of Our Year

2023

NOS Leads in Europe: The Fastest Mobile Network

NOS was recognised by Ookla as the fastest mobile network in Europe, with an average download speed of 190.33 Mbps. This achievement places Portugal at the forefront of European telecommunications, reflecting NOS's continuous investment in technology and innovation.

NOS Drives Innovation in Portugal

NOS is the leading investor in innovation in Portugal, with over €95 million invested in R&D, particularly in 5G and Artificial Intelligence projects. This commitment reinforces NOS's role in the country's digital transformation, driving new solutions in sectors such as healthcare, sustainability, and entertainment.

Launch of Pulsoo: NOS Facilitates Financial Management for Small Businesses

NOS and BPI launched Pulsoo, an app that centralises bank accounts, organises expenses, and provides alerts for tax deadlines, simplifying small business management.

NOS Implements 5G at Recipharm to Optimise Production

In partnership with Recipharm, NOS implemented an intelligent 5G system using IoT sensors to monitor and optimise 19 production lines in real-time. This solution aims to increase efficiency, reduce downtime, and enhance quality, reflecting NOS's commitment to industrial digitalisation.

Open Innovation 5G

NOS launched an Open Call for Industry 4.0 start-ups as part of the 5G Test Bed initiative, providing support for developing and testing innovative solutions. Selected start-ups can collaborate with leading companies and present projects to investors, boosting digital transformation and innovation in Portugal.

NOS Inaugurates Digital Classrooms for All

NOS inaugurated the first Digital Classroom at the Johnson Academy in Amadora. Equipped with state-of-the-art technology and 5G connectivity, this space provides vulnerable communities with access to study resources, training, and professional activities, supporting over 200 young people, children, and families in the Zambujal neighbourhood.

Diversity Month

In May, we celebrated Diversity Month, reaffirming our commitment to inclusion and equity. This initiative raised employee awareness of the importance of diversity, fostering a more inclusive work environment through various activities and partnerships. It highlighted the value of different perspectives within our teams and reinforced our leadership in this area. The success of this celebration strengthened our inclusive culture and created conditions that support growth and innovation within the organisation.

10 Years of NOS

In 2024, we celebrated the 10th anniversary of the NOS brand, a decade defined by innovation, connectivity, and progress. Over these 10 years, we have experienced growth, overcome challenges, and made a positive impact on Portugal, connecting people, businesses, and communities through technology.

To mark this special milestone, we organised the SOMOS NOS Run, bringing employees together in a moment of celebration and reinforcing team spirit. More than just a celebration, it was a demonstration of the collective impact we continue to build, renewing our ambition for the future.

NOS joins the Neurodiversity Programme

NOS joined the Specialisterne Talent Programme, which aims to recruit and integrate people on the autism spectrum into our organisation. Our goal is to raise awareness among employees and society, facilitating the integration of neurodiverse individuals. We want these individuals to be valued for their potential and capabilities rather than being defined by their limitations, providing them with opportunities for professional development and growth.

NOS Cinemas celebrate Portuguese Cinema

Since May 2024, three NOS Cinemas have dedicated screens exclusively to Portuguese cinema. This pioneering initiative offers a continuous programme of national films, including premieres and re-releases of iconic works.

Industry Club

NOS, in partnership with COTEC, INESC TEC, Kaizen Institute, and Porto Business School, launched the Industry Club, an alliance to drive digital transformation and competitiveness in Portuguese industry. Through training, networking, and best practice sharing, the club supports companies in adopting technology and innovation to achieve digital excellence.

NOS Introduces First Smart Homes

NOS presents the first NOS Smart Home, featuring 65 smart homes in Lisbon and Porto, offering automation, security, and energy efficiency functionalities. These spaces are designed for a sustainable and technology-driven lifestyle.

"Emotion Vest" at NOS Alive

NOS brought the magic of music to the NOS Alive festival, creating Portugal's first inclusive experience for deaf people using haptic vests and real-time Portuguese Sign Language interpretation, all enabled by 5G.

NOS x DareData: Investment in Artificial Intelligence

NOS acquired a stake in DareData, reinforcing its commitment to generative Artificial Intelligence and innovative solutions. This partnership will drive new AI-based technologies and scalable solutions for the global market, placing Portugal on the Artificial Intelligence map.

NOS Hub 5G: Two Years of Innovation

NOS celebrated two years of the NOS 5G Hub, an innovation centre that has delivered 37 pilot projects, driving digital transformation in industries such as tourism, manufacturing, and smart cities. This initiative highlights NOS's commitment to Portugal's digital future.

Nationwide 5G Coverage by NOS

This summer, NOS ensured the best internet experience with 5G coverage in every municipality in Portugal.

5G Healthcare

NOS leads the 5G Healthcare project, a pioneering initiative using 5G to transform healthcare services. With solutions such as telemedicine, real-time robotic surgeries, and remote patient monitoring, this project promises to enhance the quality and accessibility of medical care.

Reusable Cups at NOS Cinemas

Since September, NOS Cinemas has initiated a sustainability pilot project, introducing reusable cups in five locations. This initiative encourages customers to be agents of change by returning cups at the end of each session, reinforcing NOS's commitment to a more sustainable future and reducing environmental impact.

NOS Expands Fibre and Cinemas to the Azores

NOS inaugurated its first cinema complex in the Azores and announced the expansion of its fibre services to all islands by April 2025. With 99% of the population already covered by NOS 5G, this initiative strengthens NOS's commitment to technological and cultural development in the region.

NOS Launches 5G Standalone

NOS became the first operator in Portugal to launch 5G Standalone, offering customers 5G+ with ultra-low latency, higher upload speeds, and improved energy efficiency. With this new technology, NOS strengthens its commitment to providing the best network experience for advanced applications, from gaming to IoT.

NOS Launches 'Pata à Porta'

In collaboration with Animalife, NOS launched the 'Pata à Porta' platform, an innovative pet adoption initiative that leverages 5G-powered Augmented Reality (AR) to create an immersive experience. This project helps prospective adopters connect with pets remotely, making the adoption process more engaging and effective.

NOS Launches 'Football for All'

NOS developed the 'Football for All' app, an initiative that revolutionises the way blind or visually impaired individuals experience football. Created in partnership with the Polytechnic Institute of Leiria, this app uses sound spatialisation technology to interpret and relay real-time key moments of the matches.

NOS Kids and Fundação do Gil - A Christmas for Youth Mental Health

NOS partnered with Fundação do Gil to support youth mental health through its NOS Kids tariff. Every subscription made until December 25th directly contributed to Clínica do Gil, a facility dedicated to the psychological well-being of children and teenagers.

NOS Scholarships to Boost Portuguese SMEs

NOS offers up to 200 scholarships for the NOVA SBE VOICE Leadership programme, covering 50% of the tuition fees and equipping national SMEs with top-tier training in critical areas such as digital transformation and internationalisation. Through this initiative, NOS reinforces its commitment to economic development and the competitiveness of Portuguese businesses.

NOS Celebrates Three Years of 5G with Innovation and Inclusion

NOS marked the third anniversary of 5G in Portugal with a month dedicated to showcasing the transformative impact of this technology on society. From Augmented Reality for animal adoption to a new inclusive app for football fans, NOS reinforced its commitment to innovation and improving the lives of Portuguese citizens.

Partnership with Cinemas & Valor T

NOS joined forces with Valor T to promote workplace inclusion by hiring and integrating individuals with diverse cognitive and motor abilities into NOS cinemas. As part of this initiative, teams have received inclusive recruitment training, reinforcing NOS's commitment to a more diverse, accessible, and equitable work environment.

NOS Completes 1,700 Smart Homes

In the first year of the NOS Smart Home initiative, over 1,700 smart homes were completed, supported by partnerships with 14 property developers. This solution integrates security, energy efficiency, and automation, reinforcing NOS's role in residential innovation and sustainable living.

2024

1.1.4 Our essence: Purpose, Mission, Vision, and Values

There are more challenges within us.

Purpose

Why we exist

We exist to bring life to life, expanding all the possible and imaginary connections.

Vision

Where we want to go

To be a driving force in Portugal's progress to becoming a better society, in which everything and everyone is connected to everyone and everything in extraordinary ways.

Mission

What we do

Our mission is to connect people, companies and institutions to everything and everyone, leveraging the most advanced technologies to provide the best experience, surprising and building empathetic and transparent customer relationships. We always act with ambition, with a challenging and transformational mindset, with the future as our inspiration and the creation of value for society as our ultimate goal.



Values

We are committed to our customers

- We strive to improve customer experience every day, putting the customer at the centre of our thinking, decisions, and actions.
- We build transparent and genuine relationships, simplifying customer interactions wherever possible.

We do what no one else has done

- We anticipate the future and change. We challenge the status quo, valuing different opinions.
- We have the courage and enthusiasm to test new solutions, without fear of failure and we learn from our mistakes.

We want more

- We have the will to lead, to always do better and go beyond.
- We operate with the determination and enthusiasm necessary to achieve success.
- We are action-focused and swift to act.

We take responsibility

- We act with integrity.
- We act on trust and encourage a sharing and collaborative working environment.
- We are autonomous and know how to assume individual and collective responsibility for our options and decisions.

We value our people

- We invest in the development of our potential and learning.
- We take advantage of the opportunities we create and acknowledge achievements and merit.

We build a better future

- We create with impact, generating value for ourselves, for those we are connected to and for the community.
- We contribute, through our actions, to the resolution of environmental and social challenges.

1.1.5 Activity and Portfolio

NOS is the leading national Telecommunications and Entertainment Grupo, the two main areas of the group business.

Telecommunications

1,629.1 M€
Revenue

720.9 M€
EBITDA

Telco

NOS is the leader in Portugal in mobile network quality and 5G coverage, reaching more than 99.6%[3] of the population, and has one of the largest fibre optic (FttH) infrastructures, present in thousands of households. As a convergent operator, it offers an integrated and innovative ecosystem of fixed and mobile solutions – internet, television, entertainment, voice, and data – for both residential and business customers, with a strong focus on the best user experience and technological innovation.

In the residential market, particularly in subscription TV services, NOS stands out for its innovation in entertainment, with services such as UMA TV and the NOS TV App, which are widely recognised by consumers for their quality. Additionally, we have introduced services such as eSIM and integrated home security solutions.

For the business segment, NOS provides a comprehensive portfolio of advanced solutions, including telecommunications, IoT, Cloud, and cybersecurity, tailored to the needs of each sector. Our next-generation network supports various digital transformation projects, such as smart cities and sustainable mobility.

Continuous investment in innovation, positions NOS among the top companies investing in R&D in Portugal, leveraging emerging technologies such as artificial intelligence and advanced data analytics. Examples such as the first remote ultrasounds performed using 5G highlight the impact of NOS technology across different sectors, including healthcare and energy efficiency, contributing to Portugal's sustainable development and digital transition.

[3] Internal NOS Data as of December 2024.



New Tech and Adjacent Businesses

Alarms

In 2022, NOS launched the NOS | Securitas Smart Alarm, an advanced security solution for homes and small businesses, developed in partnership with Securitas Portugal and leading technology companies. This system features continuous monitoring with direct communication to the Alarm Centre and authorities, offering smart protection with remote control via an app and web portal. Equipped with motion detectors, video cameras, and smoke sensors, it ensures a connected, secure, and intuitive security experience.

Officially launched in November 2023 and aimed at property developers, NOS Smart Home seeks to transform the experience of living in a smart home. NOS works as a partner from project conception, through installation and commercial support, ensuring a fully immersive and futuristic living experience for its residents.

In this new era of housing with NOS Smart Home, technology transforms homes into more efficient, comfortable, and sustainable spaces, as required by the future.

Ten Twenty One

Ten Twenty One helps transform business processes using a proven IT modernisation framework, backed by more than five years of collaboration with major organisations.

Its innovative consulting practices and deep expertise in cloud engineering bring a new perspective to identifying and capturing additional value for business.

Playce

NOS has partnered with Playce, placing technology at the service of the Portuguese economy by creating an entirely innovative way for brands in Portugal to engage with their customers.

Playce combines the best of both worlds in an unbeatable value proposition, merging advanced digital segmentation with the high-impact communication that only TV can provide.

As a founding partner of Playce, NOS takes another solid step in its total commitment to innovation and technological disruption, in a long-term strategic project aiming to become the benchmark for communication in Portugal.

Media and Entertainment

102.2 M€
Revenue

46.7 M€
EBITDA

NOS Cinemas

With 218 screens across Portugal, NOS Cinemas is the leader in film exhibition nationwide, as well as in screening alternative content (opera, ballet, theatre, football, concerts, and other live or recorded events). As an active promoter of culture and entertainment, NOS Cinemas continuously invests in innovation and enhancing the cinema-going experience, becoming fully digital and incorporating technologies such as IMAX, 4DX, XVision, and ATMOS. Our ambition is to be ever closer to audiences, offering maximum comfort, the latest technology, and the best content.

NOS Audiovisuais

NOS Audiovisuais operates in the distribution of audiovisual works, both in Portugal and in Portuguese-speaking African countries (PALOP), particularly Angola and Mozambique. It is the leading content distributor in the Portuguese market and ensures, through the acquisition and management of rights, the distribution of films and series from independent producers and major studios to cinemas, audiovisual platforms, and televisions.



Joint-ventures

213.4 M€
Sport TV Revenue

31.7 M€
ZAP Revenue

16.7 M€
Dreamia Revenue

Sport TV

Sport TV is a leading Portuguese television channel specialising in premium sports content, broadcasting national and international competitions live and exclusively. Its leadership position is reinforced by extensive coverage of events such as the Portuguese League, Portuguese Cup, League Cup, major European Leagues, South American tournaments, and sports such as NBA, Moto GP, WRC, and NASCAR.

NOS holds a 25% stake in Sport TV, strengthening its content portfolio and reinforcing its presence in Portugal's sports entertainment market.

ZAP

ZAP is a Portuguese-language television operator offering satellite and fibre-optic TV services, primarily operating in Angola and Mozambique. This joint venture was established in 2009, with NOS holding a 30% minority stake, while the remaining 70% is owned by an Angolan partner. This partnership with ZAP has secured NOS a presence in the African market in a Portuguese-speaking country, leveraging ZAP's infrastructure and expertise in the region.

Dreamia

Dreamia is a joint venture equally owned by NOS, through NOS Lusomundo Audiovisuais, and AMC Networks International Iberia. It is dedicated to producing and managing television channels for the Portuguese market and Portuguese-speaking African markets such as Angola, Mozambique, and Cape Verde, through channels including Biggs, Canal Panda, Hollywood, and Blast.

Subsequent Events

On 27 January 2025, NOS SGPS S.A. announced an agreement between NOS and Claranet Group Limited for the acquisition of 100% of Claranet Portugal, S.A.'s share capital for €152 million.

This agreement will enable NOS to strengthen its position as a trusted and relevant technology partner for its business clientes while simultaneously expanding its capabilities in the rapidly growing technology sector. By integrating Claranet Portugal's experience and resources, NOS reinforces its strategic ambition to provide innovative and resilient digital solutions that meet the evolving needs of businesses and drive the technological transformation of economy and society.

The completion of this agreement is subject to approval by the Competition Authority.

1.1.6 Our Strategy

A review of the ongoing strategic cycle demonstrates a successful trajectory in key areas:

Unquestionable 5G Leadership

We have achieved an undisputed leadership position in 5G, being the operator with the largest coverage and highest network quality in Portugal. We have the highest number of installed base stations, the most extensive population coverage, and the best service quality, as confirmed by independent studies.

Digital Empowerment

We have definitively accelerated the digital empowerment agenda, delivering more and better functionalities and services to our customers. We have renewed the MyNOS APP ecosystem and our transactional brand platforms, leading to highly positive impacts on interactions, customer service capacity, issue resolution, and overall customer satisfaction.

Competitive Differentiation

We have reached all market segments with distinctive competitive positioning, both for consumer and business markets. By leveraging our unique assets in network, technology, and content, along with the expertise of our teams, we deliver the best holistic experience to our customers.

Strong Customer Relationships

We have built closer relationships with our customers through more personalised management, particularly by implementing AI-powered contact and service platforms. The massive incorporation of new technologies into our operational processes allows us to gain a deeper understanding of customer needs, tailor our offerings, and create increasingly individualised relationships.

Value Creation

We create value through our core telecom business and by leveraging adjacent businesses. We maximise our significant investments in networks and infrastructure with innovative value propositions and agile, efficient business processes, making the most of our existing assets to benefit the market and all stakeholders. We have significantly expanded our customer base and the services we provide, increased our consolidated revenues, and generated productive returns on our investments, contributing decisively to the country's sustainable transformation and long-term value creation for our investors, employees, partners, and suppliers.

Focus on Our People

We have reinforced our focus on our people, who are absolutely central to our organisation's continued success. Our commitment to values, employee well-being, and career development is reflected in numerous engagement and continuous training programmes. These initiatives foster essential skills for individual growth and business expansion. Talent recognition and promotion are the cornerstone of our culture, with an emphasis on future-oriented skills.

In 2024, we consolidated our talent development and retention programme, based on principles of aspirational, inclusive leadership and continuous feedback. Additionally, we strengthened our societal impact by publishing our Human Rights Policy, which extends our commitment to our values across the entire value chain, involving employees, partners, suppliers, customers, and the wider community directly or indirectly impacted by our operations.

Today, we are a stronger, more resilient, and inclusive company and team, prepared to anticipate and respond to future challenges.

We are entering a new cycle, marked by the challenges of an increasingly demanding market environment but also by the opportunities created by this period of immense technological transformation and disruption. Our ambition is to lead with excellence and purpose, serving all our stakeholders responsibly and committing to sustained value creation.

Strategic Pillars 2025-2030

01 Consolidating Our Leadership in the Consumer Segment

We aim to strengthen and consolidate our leadership in the consumer segment by developing a clearly differentiated value proposition, built on our technological superiority, fostering a relationship of proximity, credibility, and trust with our customers.

02 Disruptive Growth in the Enterprise Segment

We will continue to drive disruptive growth in the enterprise segment, reinforcing our position as the preferred partner for our customers' technological transformation. Our ambition is to expand by leveraging our technological assets and the holistic capabilities of our teams while offering new products and services, including non-telecom and ICT solutions.

03 Scaling Artificial Intelligence and Advanced Digital Solutions

We will scale Artificial Intelligence and advanced digital solutions across the entire company and all market segments, maximising business potential and pushing the boundaries of innovation. The skills required to harness the benefits and productivity gains of this technological revolution will be embedded in all business areas and functions, transforming NOS into a truly AI-enabled organisation, ready for future technological challenges.

04 Investing in Our People

In a constantly evolving sector, we will continue to invest in our people, creating an ecosystem where employees are empowered to drive and implement necessary transformations. We will promote diversity and inclusion and uphold the highest environmental management standards. Our goal is to be a benchmark for best practices in responsible management, both within our operations and across our value chain, reinforcing our unequivocal commitment to sustainable development and the digital transition of society and the economy, earning the trust of all our stakeholders.

05 Optimising Financial Management and Capital Allocation

We will continue to ensure the optimisation of financial management and capital allocation to meet strategic goals and maximise results, prioritising operational profitability and return on invested capital. This operational and financial discipline strengthens our market competitiveness and ensures financial sustainability. It is essential for continued investment in the future, creating value for our shareholders, society, and positioning NOS as a key driver of national progress.

1.1.7 Our Sustainability Strategy

The 2025-2030 strategic cycle is integrated into NOS's corporate planning framework and aligns with the United Nations Sustainable Development Goals. The sustainability strategy actively contributes to 11 of the 17 goals, as these are the most closely linked to the company's activities and positioning. Consequently, NOS is well-placed to generate value and contribute significantly to the sustainable development of society.

Strategic Cycle 2025-2030

Strategic pillar	SDG
A more connected society **Connecting all communities safely and responsibly to next-generation networks, while harnessing the benefits of technological innovation and digital literacy.** **This contributes to reducing isolation and social and economic inequality, promoting digital inclusion, and improving quality of life for all.**	
More for our people **Being a reference in the protection and promotion of human rights, both within our operations and in managing relationships across our value chain.**	
On behalf of the Planet **Consolidating an organisational culture committed to reducing the environmental impact of our operations and value chain, leveraging the transformational potential of our technology to minimise our customers' environmental footprint and ensure business resilience in the face of climate change.**	
Responsible Leadership **Being a reference for exemplar ethical behaviour and corporate transparency, both within our operations and in managing relationships across our value chain.**	

INTEGRATED MANAGEMENT REPORT

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1.2.1 Overview of our performance this year



Jorge Graça
CTO & NOS' Executive Board Member

"Our mobile network was recognised as the best in Europe, and our 5G service was acknowledged as the fastest in the country"

"The commitment and mission of NOS to provide the best and most innovative communication solutions to all families and businesses across the national territory was further strengthened in 2024, with remarkable progress in both mobile and fixed networks. Our mobile network was recognised as the best in Europe, and our 5G service was acknowledged as the fastest in the country. Our leadership in 5G, maintained over the three years following its launch, was further consolidated in 2024 with the expansion of our base stations to over 4,700, reaching every municipality in Portugal and achieving a population coverage rate of over 99%. We were also pioneers in launching stand-alone 5G, reinforcing our position at the forefront of innovation. At the same time, we continued the expansion and optimisation of our fixed network infrastructure, which also experienced significant development, enabling us to reach more than 5.7 million homes with next-generation connectivity, offering access to the best technology throughout the country."

Leaders in Delivering the Most Advanced Communication and Data Technology Across the Entire National Territory

Our determination and commitment to providing the best communication, technology, and entertainment services across Portugal, whether on the mainland or the islands, materialised in 2024 through a wide range of investments, uniting technology, innovation, and sustainability. We continued our focus on excellence in telecommunications infrastructure in Portugal by expanding our fixed network to areas where we were not previously present, while maintaining our commitment to the mobile network, being recognised as the operator with the best mobile network in Europe and the leader in 5G in Portugal. We integrate the best technology into our service, reducing social disparities and creating unique opportunities for our customers, partners, businesses, and institutions across the country.

The expansion of our fixed network coverage proceeded in alignment with an economically rational and more sustainable implementation approach, whether through proprietary construction, sharing agreements, or wholesale partnerships. In January 2024, we announced the extension of our FttH fixed network sharing agreement with Vodafone, aiming to reach more than 6 million homes with next-generation connectivity by the end of the agreement. Throughout 2024, NOS's FttH coverage expanded by 695,000 households, reaching 82.5% of its total Gigabit fixed network coverage of 5.7 million households. The investment in our fixed and mobile network infrastructure reflects our ongoing commitment to Portugal.

Since the beginning of 2020, we have continuously invested in the expansion and optimisation of our mobile network infrastructure. In February 2024, our efforts and dedication were recognised by Ookla®, which awarded us the title of the best mobile network in Europe. This international recognition by Ookla®, the global leader in connectivity insights, is a source of great pride for NOS and for all Portuguese citizens who benefit from the quality of our services, whether directly or indirectly. It validates our work in connecting Portugal to the future and contributing to digital transition, as well as social and territorial cohesion.

Additionally, in 2024, we reaffirmed our leadership in 5G technology implementation in Portugal, winning the Speedtest Award for the fastest operator for the fifth consecutive semester. Three years after pioneering the launch of 5G in Portugal, by the end of 2024, our network covered over 99% of the Portuguese population, with 4,780 active 5G mobile antennas—the highest number among all operators in the country. We were also the first to achieve full 5G coverage across all municipalities in Portugal. These results are the culmination of our teams' continuous effort and dedication to promoting greater and better connectivity, breaking down physical barriers, and opening new opportunities for all Portuguese citizens, regardless of their location.

NOS's FttH coverage

82.5%

Throughout 2024, NOS's FttH coverage expanded by 695,000 households, reaching 82.5% of its total Gigabit fixed network coverage of 5.7 million households.

5G Technology

99.6%

By the end of 2024, our network covered over 99% of the Portuguese population, with 4,780 active 5G mobile antennas—the highest number among all operators in the country.

We take immense pride in the fact that our investments and efforts translate into tangible results: in the speed and reach of our network, in pioneering new technology launches, in the strategic partnerships we have consolidated, and in the innovative projects we have implemented—cementing our position as market leaders. Throughout 2024, we spearheaded the launch of various technological solutions, including Stand-Alone 5G (5G SA), the introduction of Mobile Edge Computing (MEC), and the expansion of network functionality exposure through the development of multiple APIs (Application Programming Interfaces), reinforcing our commitment to advancing and enhancing the accessibility of technology in Portugal. The 5G SA technology, offering benefits such as ultra-low latency, faster upload speeds, and improved energy efficiency, enables high-demand applications like network slicing, which ensures service quality



tailored to different use cases. Meanwhile, the deployment of MEC in our network allows near real-time data processing, offering high computing capacity, low latency, and simultaneous management of multiple applications, unlocking new opportunities in artificial intelligence and computer vision.

Our unwavering commitment to Portugal is comprehensive and inclusive, extending not only to the mainland but also to the Madeira and Azores archipelagos. In the Azores, we are also the 5G leader, reaching all islands and covering approximately 98% of the population. At the same time, we are advancing the expansion of our fibre-optic network, aiming to make television and fixed internet services available across all islands by 2025. Additionally, in 2024, we inaugurated the first cinema complex in the Azores, reinforcing our commitment to delivering the best services—whether in communications or entertainment—both on the islands and to all Portuguese citizens.



Manuel Ramalho Eanes
NOS' Executive Board Member

"We have a clear commitment to delivering an outstanding service and experience"

"We have a clear commitment to delivering an outstanding service and experience, built on the most advanced expertise and infrastructure in the country, as well as the most solid and relevant ecosystem of partners. Having the fastest 5G network in Europe guarantees exceptional performance for our business customers, who demand the highest level of mobile network reliability for collaboration and support of their critical business applications. As the preferred partner in our customers' transformation processes, we are expected to demonstrate mastery and expertise in implementing and operating the best technologies from the leading manufacturers in each domain, including critical networks, security, cloud, managed services, 5G, and AI. In this regard, the recognitions received from our strategic technology partners are highly significant, as they validate our expertise and experience, allowing us to continue expanding our solutions and services by leveraging our technological assets.
The remarkable improvement in satisfaction levels across all business segments is a testament to the investment made over the years in talent, infrastructure, technology, resilience, and the agility of new solutions. It also reflects our ongoing efforts to simplify and enhance the overall customer experience."

At the Forefront of Innovation and Technological Support for Businesses and Institutions in Portugal

NOS positions itself as a key player in Portugal's innovation ecosystem, with an R&D investment exceeding €95 million, actively participating in various Mobilising Agendas and leading numerous innovative projects through the NOS Hub 5G.

The NOS Hub 5G, which celebrated its second anniversary in 2024, has been a crucial component of our leadership journey in 5G, reflecting our commitment to fostering innovation in Portugal, helping organisations harness the full potential of this revolutionary technology, accelerating digital transformation, and contributing to greater competitiveness in our economy. Since its inception, the NOS Hub 5G has served as a platform for the development of multiple innovation initiatives, including the 5G Test Bed, which plays a decisive role in strengthening a more robust innovation ecosystem across different sectors in the country.

We drive the introduction of 5G in businesses and institutions, opening doors to a new digital era and leading, alongside our partners, the opportunities that this technology provides. Through the NOS Hub 5G, and in collaboration with the Portuguese business landscape, we contribute to the development and testing of various solutions and innovative projects, already accounting for over 600 5G projects, actively supporting the development of both industry and the Portuguese economy.



Our technology consultancy solutions have gained increasing relevance in the business segment, propelled by the creation of TenTwentyOne in February 2023. The establishment of this company has allowed us to specialise further in the Cloud segment, strengthening our ability to support clients in overcoming their challenges, achieving widespread recognition from clients and technology partners in 2024, and driving remarkable growth in its activities. Through the NOS 5G Fund, we have reinforced our commitment to innovation and technological transformation by acquiring a 20% stake in DareData, one of Portugal's most promising companies in Artificial Intelligence, Generative AI, and Machine Learning. DareData enables us to help our clients accelerate their technological journey towards the adoption of Generative Artificial Intelligence, equipping them with a new arsenal of expertise, experience, and tailored technological solutions, fostering digital transformation across various industries. We have also strengthened our investment in cybersecurity solutions, having conducted a comprehensive review of our cybersecurity product and service portfolio in the era of artificial intelligence, which allows us to provide a fully integrated and comprehensive response to the cybersecurity challenges faced by our clients and partners.

Supported by an outstanding infrastructure, cutting-edge technology, and the ambition of our teams to remain the partner of choice, we continue to focus on the continuous development of skills to lead the transformation of the business sector in Portugal. Growth and upskilling within a technology company like NOS is a demanding and ongoing process, materialised through an extensive certification programme for our technology teams in customer experience. The past year has been marked by major industry recognitions for NOS and our teams across various technological fields, with highlights including the recognition by Cisco as Best Managed Services Provider in EMEA South, by Google Cloud Portugal as Best New Partner in 2023 and Demand Creation in 2024, by Microsoft through the achievement of all Azure designations, namely Solutions Partner Designation Data & AI and Solutions Partner Designation Digital & App Innovation, as well as the attainment of data centre specialisation from Fortinet.

DareData

20%

Through the NOS 5G Fund, we have reinforced our commitment to innovation and technological transformation by acquiring a 20% stake in DareData, one of Portugal's most promising companies in Artificial Intelligence, Generative AI, and Machine Learning.



Daniel Beato
NOS' Executive Board Member

"We place great importance on building close and meaningful relationships with our customers"

"NOS's value proposition in the consumer segment is built on the excellence of its services, offering the best and fastest mobile network in Portugal, complemented by the most advanced technological solutions and a carefully designed and continuously refined customer experience. We have strengthened the value of our convergent service offerings, ensuring superior service delivery while also introducing new low-cost offerings and expanding adjacent business areas in a synergistic way by leveraging our existing assets. We place great importance on building close and meaningful relationships with our customers, fostering credibility and trust through high-quality service and continuous innovation. Ultimately, our commitment remains centered on customer satisfaction, ensuring that our services exceed expectations and drive long-term loyalty".

We are the Operator Closest and Most Accessible to All Portuguese People, Delivering the Most Comprehensive and Relevant Services and Providing the Best Service Experience to Our Customers

In the consumer segment, we continued our commitment to innovation, digitalisation, and enhancing the customer experience, leveraging the technological superiority of our infrastructures. We improved NOS's value proposition with a comprehensive approach across all our services and solutions, particularly in convergent and high-value-added offerings. In response to customer needs, we revisited television content and applications and introduced new mobile solutions with an enhanced customer experience. We complemented our portfolio with new 1P & 2P offers, while simultaneously strengthening our investment in the low-cost segment with the consolidation of WOO, and in our adjacent businesses, with significant growth in NOS Alarms.

Television content plays a pivotal role in the Portuguese market, with a penetration rate of 96.7%[1]. In this regard, we continued our efforts to provide the best content and the best experience to our customers, achieving a net growth of 8,000 customers, reaching approximately 1.7 million by the end of 2024. We restructured NOS's channel line-up to enable more intuitive navigation across different themes, significantly improving the content consumption experience and access to entertainment options for all. In 2024, we expanded our channel selection with various additions, including HGTV, dedicated to design and space renovation, and the exclusive TV Zimbo, broadening content for the Angolan community residing in Portugal. We also introduced new channels such as News NOW, offering extensive news coverage, V+ TVI, featuring diverse programming including entertainment and fiction, and SIC Novelas, dedicated to iconic soap operas.

[1] ANACOM data from Q3 2024.

In sports, NOS introduced new features such as BTV Experience, with a multi-camera functionality that offers alternative angles during SL Benfica matches. Additionally, advanced statistical features and highlights of key moments were integrated into sports channels, enhancing the football viewing experience. During the Olympic Games, we provided seven dedicated Eurosport channels, delivering the most comprehensive coverage of the events.

Our commitment to delivering the best mobile experience in Portugal and Europe continued to drive our investments in network innovation and modernisation. The superiority of our infrastructure was further enhanced by significant improvements in mobile experiences, leading the way in launching solutions that enrich our customers' connectivity:

VoLTE

Enabling simultaneous internet browsing while making calls, transforming the way our customers communicate.

Wi-Fi Calling

Allowing calls to be made via Wi-Fi, ensuring connectivity through various technological solutions.

eSIM

A digital SIM innovation that enables customers to use a mobile number without requiring a physical SIM card.

Smart Number

Facilitating the use of the same number across multiple connected devices such as smartwatches, promoting convenience and connectivity.

Roaming Packages

Tailored solutions to meet the current browsing needs of travellers to major international destinations.

We also launched new solutions and offers in the consumer segment, particularly 1P & 2P, providing a high-quality alternative for customers seeking standalone internet and mobile voice services. These solutions allow customers to benefit from Portugal's best infrastructure, ensuring that NOS meets the diverse needs of consumers.

In the low-cost segment, WOO strengthened its position as the best telecommunications solution while maintaining the highest customer satisfaction levels in the segment. It was recognised by consumers with the Product of the Year award. Throughout 2024, we expanded WOO's offerings to become a fully-fledged operator, now including television services while continuing to provide a fully digital customer experience.

The investments made in improving our infrastructures, products, and services were accompanied by a review of different phases in the customer journey. Among the numerous improvements made throughout 2024, we restructured our website, enhanced customer service, and simplified the disconnection processes. All these investments and improvements led to historically high levels of customer satisfaction and recommendations, alongside a record-low disconnection rate.

Our website was completely redesigned to offer the best experience to our customers, simplifying processes and incorporating new functionalities. In response to the growing number of international customers and to foster inclusivity, we not only introduced English-language navigation but also revised all customer journey stages throughout the lifecycle, strengthening our connection with diverse communities and nationalities. Our mobile service application was also updated and improved to increasingly serve as the central hub of interaction between customers and NOS.

We have transformed and simplified the customer journey to continuously enhance their experience, optimising different stages from initial contract agreements to customer service and the disconnection process. Based on collected feedback, we implemented structural changes in the disconnection phase to ensure clear and transparent communication throughout the process, including detailed information on conditions, fees, and relevant dates. We also introduced a simplified SMS confirmation system for

customer requests and enhanced the use of digital platforms, enabling real-time tracking of all necessary documentation. These improvements led to a significant increase in customer satisfaction.

NOS has been developing adjacent and value-added services to its core offerings, such as communications, NewTech, media, and entertainment. Examples include "NOS Alarms", developed in partnership with Securitas Portugal, the targeted advertising business "Playce", our international connectivity solution "GeT", and a diversified insurance range covering devices, travel, and billing.

- NOS Alarms consolidated its market presence in 2024, strengthening its position in advanced security solutions for homes and small businesses, including a new partnership with Worten for 2025 and an expanded portfolio of solutions.
- NOS Smart Home aims to transform the experience of living in a smart home. In just one year, NOS Smart Home has established itself as a benchmark for innovation and a key player in the market, with nearly 2,000 smart homes under construction or in planning and agreements secured with 15 leading property developers. With projects spanning Portugal, including Greater Porto, Greater Lisbon, the Algarve, and Leiria, NOS Smart Home seeks to democratise access to cutting-edge technology at competitive prices. By enabling more efficient resource management, such as energy and water consumption, NOS Smart Home solutions further reinforce NOS's positive contribution to environmental sustainability.

NOS Alarms

2,000

NOS Smart Home has established itself as a benchmark for innovation and a key player in the market, with nearly 2,000 smart homes under construction or in planning and agreements secured with 15 leading property developers.





Filipa Carvalho
NOS' Executive Board Member

"The commitment to AI within the context of digital transformation is a structural priority across the entire organisation"

"The use of Artificial Intelligence (AI) is now a strategic pillar of NOS. The commitment to AI within the context of digital transformation is a structural priority across the entire organisation. AI and advanced cognitive technologies are both a remarkable disruptor of customer experience and a unique opportunity for organisations to reinvent their operating models, making them more flexible and agile. These goals align precisely with NOS's highest commitments. This is the domain of AI, and as such, the organisation's investment in AI is regarded as a key differentiator in building a competitive advantage in an extraordinarily dynamic market. Our focus on the transformative power of technology has led to the development of a strategic AI programme: SCAILE. Empowering our people through the FAAST training programme is crucial to achieving the ambitious goals we have set. Our mission is to scale the impact of AI across all areas of NOS, contributing to the development of a more innovative and technologically advanced organisation, better equipped to tackle future challenges."

Doing more and doing better is our purpose as we scale Artificial Intelligence (AI) across the entire organisation and all processes, maximising the transformational benefits of this truly disruptive technology

NOS operates an extremely broad operational structure, encompassing network development, information systems, logistics operations, field forces, customer service, and technical support. It also has large-scale Marketing and Sales divisions, as well as complex and highly relevant financial and people development structures. Given this operational breadth, there is an equally vast number of opportunities to apply AI technology, transforming and enhancing operational capacity. Within this context, NOS's company-wide commitment to AI has become firmly established as a strategic pillar of the organisation, driving innovation and efficiency across all operational areas. The year 2024 marked the most significant implementation of AI projects and the highest value captured to date. This growth materialised in the deployment of over 30 projects in production, spanning more than 10 operational domains.

Customer Service stands at the forefront of operational activities where AI, particularly generative AI, has the most transformative impact. In 2024, NOS strengthened its focus on building an operating model centred on customer experience through the launch of various AI-driven projects. For example, NOS pioneered the introduction of the first fully generative virtual assistant in the Portuguese telecommunications market. Through the WOO brand, we also launched a fully generative virtual assistant capable of automatically resolving customer requests. By combining generative technologies with

Machine Learning approaches such as Smart Pairing, NOS has taken significant steps in leveraging AI's benefits to simplify and enhance customer experiences while also contributing to a more flexible and agile operating model, adapted to the increasing digital needs of our customer base.

The potential for applying different AI and Generative AI tools is now a reality across all of NOS. Machine Learning projects aimed at optimising customer relations now play a central role in the organisation's business model. Other examples of technological application include models designed to optimise network energy consumption, simultaneously fostering a more efficient operational model while contributing to NOS's sustainability goals. Additionally, analytical tools designed to support proactive technical operations contribute to an enhanced customer experience. AI's potential is tangible and stems from the organisation's continued investment in technology as the core driver of its transformation.

If 2024 was a year of consolidating AI's delivered value, 2025 will be the year of its acceleration and expansion. The launch of the SCAILE programme marks the organisation's strategic commitment to scaling AI across NOS. SCAILE is NOS's overarching AI programme, structured to establish a centralised and systemic approach to AI within the company. Its operating model is organised into different streams, including Transversal Enablement, Roadmap & Planning, and Delivery. By combining capability-building with execution, SCAILE will accelerate the adoption and expansion of AI throughout the organisation.

Through SCAILE, we aim to multiply both the number of use cases and the operational domains transformed. The programme's applicability spans various operational areas, covering cross-functional use cases across multiple sectors or single-use applications with both short- and long-term execution potential and impacts of varying magnitudes. As part of the Roadmap exercise, SCAILE has identified over a hundred AI application opportunities across multiple operational domains.

Virtual assistant

100%

NOS pioneered the introduction of the first fully generative virtual assistant in the Portuguese telecommunications market

Artificial Intelligence

SCAILE

The launch of the SCAILE programme marks the organisation's strategic commitment to scaling AI across NOS. SCAILE is NOS's overarching AI programme, structured to establish a centralised and systemic approach to AI within the company. Its operating model is organised into different streams, including Transversal Enablement, Roadmap & Planning, and Delivery.



These use cases are categorised into Optimisation, Generative AI, and Machine Learning applications. The definition of SCAILE's priorities for 2025 resulted from a rigorous analysis based on industry best practices and identified opportunities, combined with an internal reflection within each area to assess needs, improvement opportunities, feasibility, and potential impact on the organisation.

This prioritisation exercise revealed significant and far-reaching potential. In the immediate term, operational areas such as Sales, Marketing, and Customer Service stand out due to the scale of the identified opportunities. The development of AI-driven programmatic blocks such as Service Automation, Augmentation, and Generative Automation exemplifies the key focus areas of the SCAILE programme, aligned with the organisation's strategic priorities.

The potential applications of different AI and Generative AI tools extend beyond operational domains. At NOS and within SCAILE, we also believe in the power of AI to enhance personal productivity. Following the success of the FAAST training programme—designed to elevate the organisation's analytical and technological knowledge in areas such as Machine Learning and Optimisation—2025 will see the launch of FAAST Gen AI Edition. Like its predecessor, this educational initiative will focus on generative AI applications, ensuring widespread knowledge dissemination across NOS about the capabilities and potential of Generative AI. We firmly believe that as an organisation, we can only improve by developing and empowering our people.

Artificial Intelligence is not just a technology at NOS—it is a catalyst for our future. The SCAILE programme marks a new level of ambition, structuring and expanding AI's impact across all areas of the business. In 2025, we are accelerating this journey, reinforcing our position at the forefront of innovation and operational excellence.





Luis Moutinho Nascimento
NOS' Executive Board Member

"At NOS, we recognise that people are the key asset driving our organisation's success"

"At NOS, we recognise that people are the key asset driving our organisation's success. Throughout 2024, we reinforced our commitment to our teams, fostering a more inclusive and engaged environment while investing in the development of critical skills within our sector. We take pride in the launch of our latest Gender Equality Plan, strengthening practices that promote fairness and transparency in talent management. We prioritised internal talent, equipping leaders and expanding training in emerging competencies. Key initiatives include Leadershift, a cultural transformation programme designed to prepare leaders to drive a growth-oriented culture, and FAAST, which upskills employees in areas such as Data Science, Data Engineering, and Generative AI.

The transformation of our work model aligns with operational efficiency improvements, particularly in customer service and field force, where satisfaction levels continue to strengthen. This commitment also extends to television content, with an enhanced channel lineup and optimised viewing experiences for our customers. We firmly believe that continuous investment in our people—fostering well-being and professional development—is fundamental to increasing internal satisfaction levels. This approach lays the foundation for the necessary organisational transformation, ensuring an operating model that is increasingly efficient and prepared to meet future challenges."

People are our most valuable asset, and we are committed to actively empowering our talent to meet future challenges while fostering an inclusive, transparent, and diversity-respecting environment. This commitment lays the foundation for the process transformation needed to drive greater innovation and enhance operational efficiency

Throughout 2024, we continued to implement various initiatives in the People and Organisation domain, with the goal of fostering a skilled, inclusive, and motivated team ready to tackle the challenges of the future.

Through our Leadershift leadership programme, we have continued to drive the development and empowerment of NOS leaders. We have laid the foundations to successfully navigate future challenges, reinforcing the strategic role of leaders as cultural transformation agents within the organisation, promoting a more agile, digital, and innovative approach.

We strengthened the performance and development model to ensure a culture of continuous feedback, which is essential for both individual and collective development. Several training initiatives were implemented to foster a growth-oriented culture, enhancing collaboration and creating a work environment built on trust, autonomy, and psychological safety.

Continuous employee development is supported through NOS CAMPUS, a dedicated learning space structured around four strategic areas: Leadership & Management, Technical & Digital, Technological, and Cross-functional. This platform offers a personalised learning journey tailored to each employee, ensuring a flexible and individualised approach aligned with their interests and professional development needs, while simultaneously strengthening the organisation's capabilities.

At NOS, we recognise that diversity and inclusion are fundamental to our success, fostering collaboration, innovation, and sustainable growth. We remain committed to implementing equitable practices,

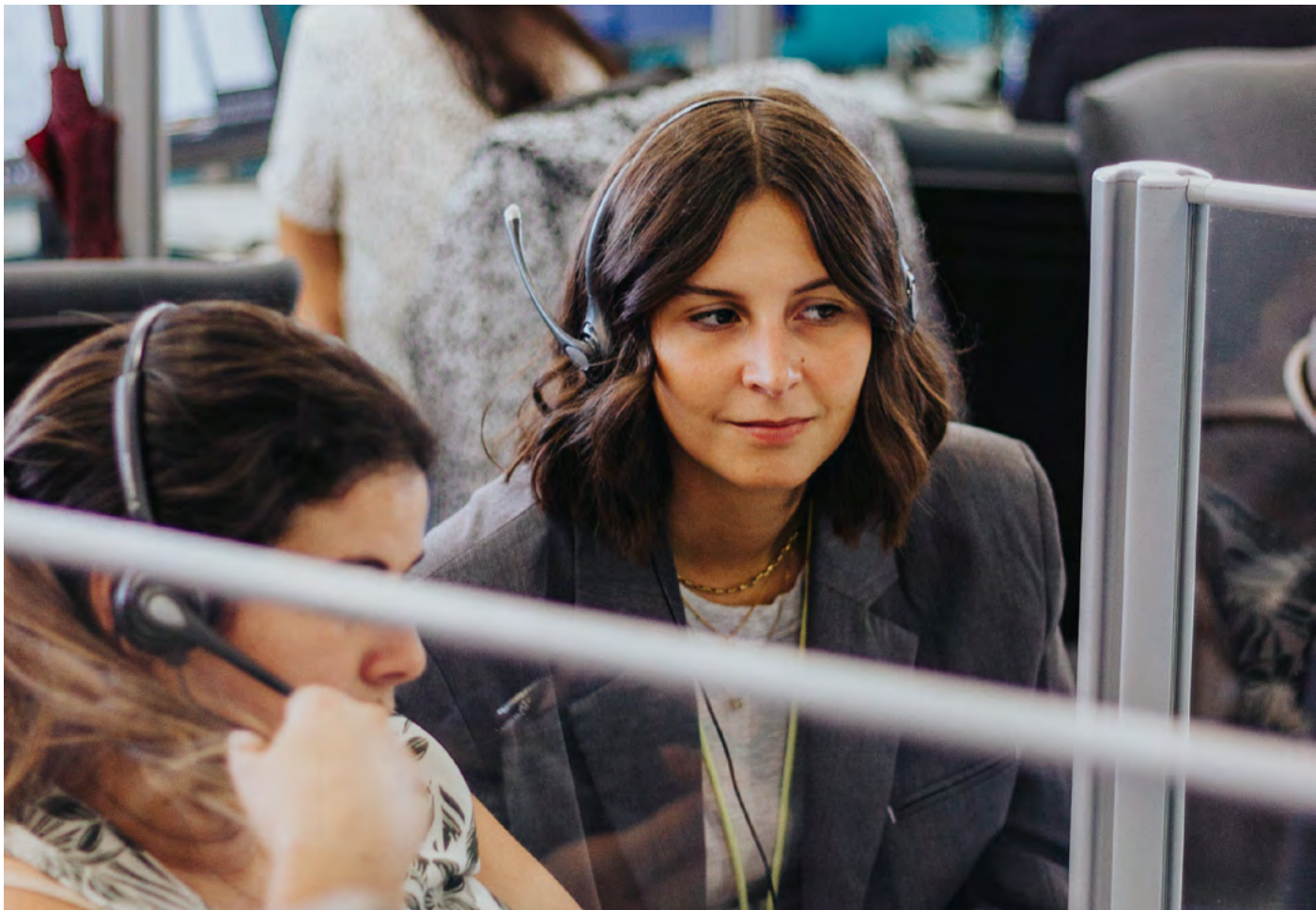
Equity

40%

We remain committed to implementing practices that promote equity, with a public commitment to achieving 40% of women in leadership positions by 2030. Aware of the challenge given the sector in which we operate, we continue to build a pipeline of female talent.

Diversity and inclusion

We also seek to enhance diversity and inclusion within the organisation, remaining committed to removing barriers and creating opportunities for all.



with a public commitment to achieving 40% of leadership positions held by women by 2030. Aware of the challenges posed by the industry in which we operate, we continue to develop a female talent pipeline, focusing on their growth and engagement, particularly in technology fields, where women r emain underrepresented from education through to the labour market.

We also strive to enhance diversity and inclusion across the organisation, actively working to eliminate barriers and create opportunities for all. Through our Neurodiversity Programme, and in partnership with two external companies, we have trained, hired, and integrated autistic individuals into our technology teams, successfully recruiting and training three employees under this programme in 2024. Additionally, within our Cinemas division, we have recruited and integrated individuals with disabilities or impairments across four locations nationwide, furthering our commitment to an inclusive and diverse workplace.

The transformation of our organisational model, equipping our people with future-ready skills, has enabled us to achieve operational efficiencies across multiple areas and processes. In 2024, we enhanced customer service and field force operations by adopting a more efficient, customer experience-focused operating model, centred on a "first-time resolution" principle. Several improvements were implemented through AI and advanced analytics solutions, including:

Immediate solutions

Call intent identification with immediate AI-driven solutions – By analysing call reasons and eliminating root causes, we achieved a significant reduction in call volume and resolution time.

Virtual Assistant

Industry-first implementation of a generative AI-powered virtual assistant in telecommunications – This assistant directs Forum NOS customers to specific support pages instantly, eliminating the need to wait for human assistance. This innovation was also extended to voice support on 16990.

Accelerated resolution

Proactive, automated resolution and seamless handover to the right team with full context – These improvements empowered our customers with greater autonomy and accelerated issue resolution.

Net Score

A personalised operating model for new and returning customers, leading to an increase in Net Score and a reduction in repeat queries.

WOO

WOO introduced a virtual assistant within its customer app, delivering a simpler, more agile, and intuitive digital experience.

Our commitment to customer service quality and efficiency remains an absolute priority, and we will continue focusing on developing innovative solutions, leveraging AI, Large Language Models, and Smart Pairing, while investing in the upskilling and optimisation of our operations. Our goal is to deliver a service that is recognised as "best in class" in Portugal's telecommunications sector. An example of this success is the recognition from consumers, with NOS and WOO being awarded the "Recommended Brand" distinction by Portal da Queixa.

The journey we have undertaken has already yielded significant and encouraging results in 2024, with efficiency gains and highly positive customer service satisfaction levels. Internally, we take pride in the improvement of our employee satisfaction levels, a fundamental indicator of success for any organisation.

Financial and Operational Results



José Koch Ferreira
CFO & NOS' Executive Board Member

"The financial and operational results of 2024 reflect the success of our strategic execution"

"The financial and operational results of 2024 reflect the success of our strategic execution. We increased our consolidated revenues by 6.2%, driven by the growing adoption of convergent services and products in the B2C segment, an increase in demand for NewTech services in the B2B segment, and a proactive value mix management approach across our entire customer base.

Our performance enabled us to strengthen our telecommunications revenue market share to 31.5%[2], an increase of 0.4 percentage points compared to the previous year. We also grew our operating profitability above revenue growth, with EBITDA increasing by 7.1%, reflecting our continued efforts to achieve operational efficiencies through the operational transformation programme and strong financial discipline. This allowed us to achieve an improved EBITDA margin to 45.3%.

Strong operational performance and a structural reduction in investment levels supported robust operational cash flow generation, culminating in a total Free Cash Flow of €359.9 million. We are confident that the results achieved will allow us to maintain our commitment to an attractive and sustainable shareholder remuneration, while ensuring a solid capital structure.

Our proposed dividend per share for the results achieved is €0.40, including an ordinary dividend per share of €0.35 and an extraordinary dividend of €0.05."

	2024(M€)	yoy
2024 Highlights		
Consolidated Revenues	1,696.3	**6.2%**
Consolidated EBITDA	767.6	**7.1%**
Consolidated EBITDA margin	45.3%	**0.4pp**
Consolidated EBITDA AL	644.9	**6.9%**
CAPEX ex leasings	372.7	**(3.9%)**
EBITDA AL - CAPEX	272.2	**26.3%**
Underlying FCF[3]	242.8	**93.8%**

[2] According to the latest official data reported by ANACOM (9M24).
[3] Excludes towers sale and non-recurring extraordinary effects related to activity fees.

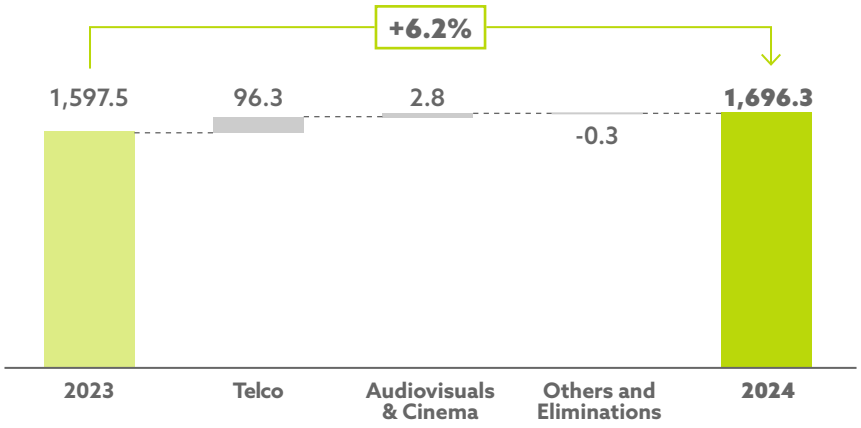
	2024 (thousands)	yoy (thousands)
2024 Highlights		
Homes passed	5,738.1	**301.3**
FttH coverage (%)	82.5%	**8.2pp**
Total RGUs	11,325.1	**337.9**
Consumer RGUs	9,549.9	**294.8**
Business RGUs	1,802.2	**43.0**
Convergent customers	1,192.8	**49.9**
Residential ARPU / Unique Subscriber with Fixed Access	51.5	**2.9%**

The strong commercial performance across all business segments, combined with continued improvements in operational efficiency and financial discipline, resulted in a record-breaking year for NOS, as evidenced by the growth in revenue, operating profitability, and cash flow generation, as well as the continued increase in retail revenue market share to 31.5%[4].

Revenue

Consolidated revenue totalled €1,696.3 million, reflecting a 6.2% year-on-year growth, driven by the strong contribution of the Telecommunications and IT segment, alongside positive performance in the cinema exhibition and audiovisual business.

2024 Consolidated Revenue
(M€)



Revenue

6.2%

Consolidated revenue totalled €1,696.3 million, reflecting a 6.2% year-on-year growth

Throughout 2024, we recorded positive momentum across all Telecommunications and IT segments, with revenue growth of 6.3% to €1,629.1 million. In the Consumer segment, which includes services provided to households and individuals, revenues increased by 4.6% year-on-year to €1,140.5 million, with positive dynamics across all services driving an increase of 294.8 RGUs. The adoption of convergent services, with 49.9 thousand net additions, continues to drive strong performance in the Consumer segment, contributing to an improved value mix and sustained growth in fixed residential ARPU, which increased by 2.9% to €51.5. NOS continues to strengthen its position in the business market, fostering new partnerships and telecommunications and IT ventures, solidifying its role as the preferred partner for digital transformation. This business unit saw revenues grow by 9.6% to €375.8 million, with particular emphasis on the growth of the Corporate large-client segment, which increased revenues by 15.2% year-on-year. Revenues from the Wholesale & Other unit increased by 12.9% to €112.9 million, primarily due to a higher volume of business in mass calling services, which are more volatile and have lower margins.

[4] ANACOM data from Q3 2024

The Cinema Exhibition and Audiovisuals division generated revenues of €102.2 million in 2024, an increase of 2.8% compared to the previous year, with respective increases of 1.8% in cinema exhibition and 8.8% in audiovisuals. In the exhibition segment, box office sales experienced some volatility throughout the year, particularly in Q2, due to the impact of the Hollywood writers' and actors' strikes. However, this was counterbalanced by the tremendous success of Inside Out 2, which premiered in Q3 2024 and sold over 1.3 million tickets in Portugal, ranking as the highest-grossing film in Portuguese box office history. The year-on-year comparison was already challenging given the phenomenal success of Oppenheimer and Barbie in 2023, ultimately leading to a 3.9% annual decline in ticket sales. A significant investment was made in the Azores, with the opening of four new cinema screens, reinforcing our commitment to providing the best entertainment infrastructure for all Portuguese audiences and increasing our total number of screens to 218. In the Audiovisuals segment, the box office success of films distributed by NOS Audiovisuais throughout 2024, particularly Inside Out 2 and Deadpool & Wolverine, both of which ended the year as the top-grossing films in Portugal, drove strong segment performance, with revenue growth of 8.8%.

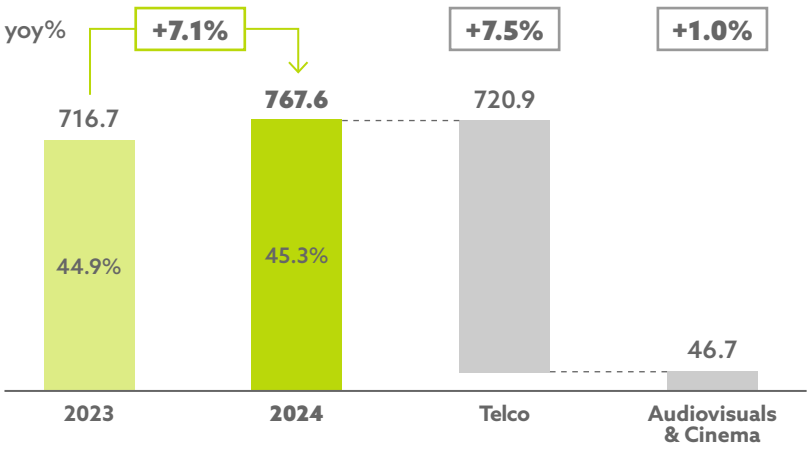
EBITDA

Consolidated EBITDA reached €767.6 million, an increase of 7.1%, driven by revenue growth and proactive, company-wide cost base management. The ongoing operational transformation programme continues to enable the restructuring and optimisation of various processes, leveraging the disruptive potential of emerging technologies such as AI and Generative AI.

The efficiencies achieved allow us to enhance business performance and redesign cost structures across multiple areas, including a 15% reduction in customer service costs and an approximate 7% reduction in maintenance team costs.

Overall, operating costs increased by 5.4% to €928.7 million, largely due to higher commercial activity in the business segment, leading to an increase in equipment resale and IT project costs. Additionally, there was a significant rise in electricity costs by approximately €14.9 million, reflecting the increase in regulated energy prices in the Portuguese market.

Consolidated EBITDA
(M€)



EBITDA

7.1%

Consolidated EBITDA reached €767.6 million, an increase of 7.1%, driven by revenue growth and proactive, company-wide cost base management

Payments related to leasing contracts totalled €122.7 million, representing an increase of 8.1%, driven by a higher number of sites with shared radio access as well as inflation-related adjustments to Cellnex payments, which were capped at 2%.

After deducting leasing costs, EBITDA AL increased by 6.9% to €644.9 million, representing a 38.0% margin.

Net Profit

Consolidated Net Profit reached €272.3 million, an increase of €91.3 million year-on-year, driven by a combination of factors, including:

i) Positive operational contribution, with EBITDA adding €51.0 million;

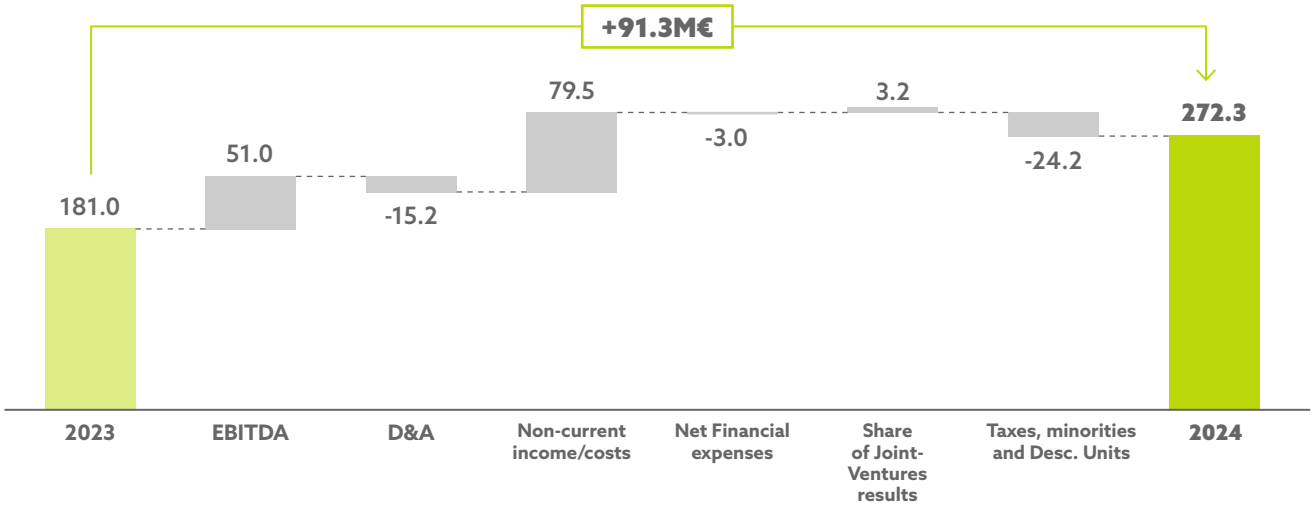
ii) Depreciation and amortisation costs, with a negative impact of €15.2 million due to revisions in the useful life of certain assets, partially offset by a reduction in recurring depreciation;

iii) Net financial results, with a negative impact of €3.0 million year-on-year, due to the higher interest rate environment in the first half of the year, followed by a trend reversal in Q3 2024 and a sharp 37.0% decline in Q4 2024;

iv) A positive contribution of €3.2 million from the results of associated companies and joint ventures, with ZAP operations benefiting from a more stable exchange rate environment;

v) Other income/expenses, which increased by €79.5 million to €110.7 million, including €54.7 million in extraordinary non-recurring income related to regulatory activity fees following favourable judicial and constitutional rulings for NOS, as well as €30.6 million in capital gains from the sale of a small tower portfolio to Cellnex, as detailed in the Free Cash Flow section.

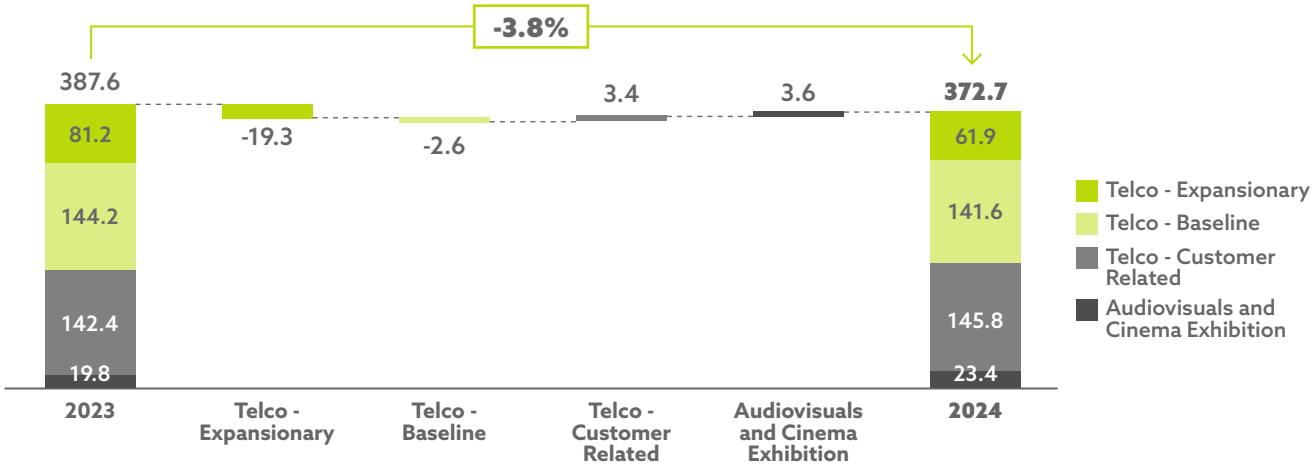
Consolidated Net Profit
(M€)



CAPEX

Total CAPEX, excluding leasing contracts and other contractual rights, decreased by 3.9% year-on-year to €372.7 million, reflecting a gradual slowdown in investment across all quarters. The structural reduction in CAPEX levels results from previous years' investments, which were frontloaded to ensure the best and most reliable mobile network in the country—with the largest number of 5G stations and as the first operator to achieve full coverage across all municipalities in Portugal. We continue to invest in the expansion and modernisation of our fixed network, ensuring the most sustainable and efficient expansion possible through a combination of own infrastructure deployment, network-sharing agreements, and wholesale access. By the end of 2024, we reached a total of 5.7 million homes, 82.5% of which were covered by FttH. Investment in the telecommunications business, excluding leasing, decreased by 2.6 percentage points to 21.4% of revenue, of which 12.5% was allocated to technical investment, with the remainder dedicated to customer-related investment. CAPEX in the Audiovisuals and Cinema segment reached €23.4 million in 2024, an increase of 18.0%, driven by the acquisition of television rights for new films.

2024 CAPEX
(M€)

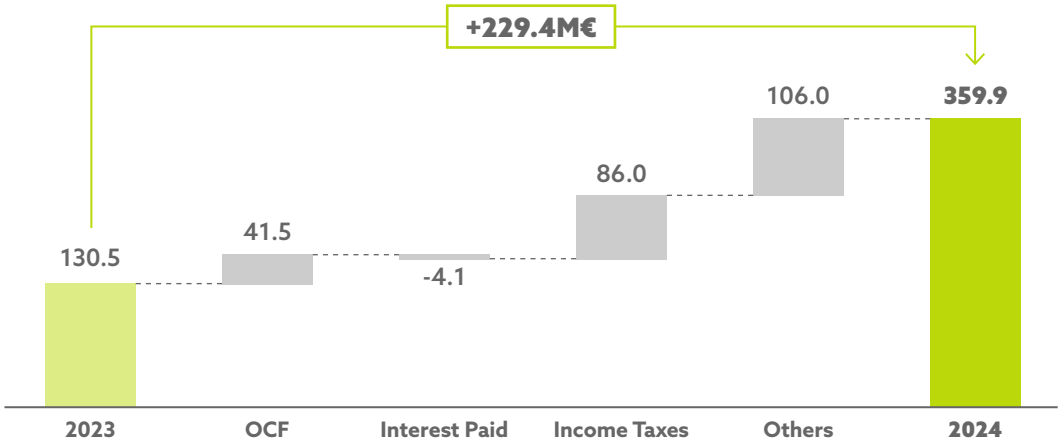


Free Cash Flow

Sustained growth in operating cash flow, supported by robust operational performance and a structural slowdown in investment levels, with non-recurring receipts boosting free cash flow generation before dividends. Operating cash flow grew by 18.8% to €261.8 million, with the €56.7 million increase in EBITDA AL-CAPEX partially offset by a €15.1 million impact on working capital and non-monetary items.

Free cash flow before taxes increased by €229.4 million, with non-recurring effects contributing an additional €119.6 million. Specifically, NOS received €59.9 million related to regulatory activity fees, following favourable court rulings initially announced in 2023 and extending throughout 2024, and €57.4 million from the transfer of an additional small portfolio of towers to Cellnex, as part of the agreement originally announced in 2020 and extended in 2022. ([Links to market announcements from 2020 and 2022]). The €86.0 million positive variance in taxes results from the fact that tax payments each year are calculated based on the previous year's taxable results. The €58.5 million tax payment in 2023 was impacted by non-recurring gains from the 2022 tower sale. The €27.5 million tax receipt in 2024 reflects the difference between the amount prepaid in 2023 and the tax assessed for 2024 in relation to that financial year.

2024 Free Cash Flow
(M€)



Capital Structure

At the end of 2024, Total Net Debt, including Leases and Long-Term Contracts (in accordance with IFRS 16), stood at €1,539.1 million, reflecting a 10.3% decrease compared to the previous year.

Total Financial Debt recorded a 16.8% reduction compared to 2023, amounting to €921.6 million.

The Cash and Cash Equivalents position in the Consolidated Balance Sheet as of 31 December 2024 was €9.1 million, resulting in Net Financial Debt of €912.5 million.

In addition to the Cash and Cash Equivalents position, NOS also had €396 million in unissued commercial paper programmes, bringing total liquidity to €405 million.

The average all-in cost of debt stood at 3.9% in 2024, an increase from 3.5% in 2023, reflecting the high-interest rate environment observed during the period.

The Net Financial Debt / EBITDA After Leases ratio now stands at 1.4x, below the benchmark of approximately 2x Net Financial Debt / EBITDA After Leases.

As of 31 December 2024, approximately 31% of NOS's issued debt was subject to a fixed interest rate. Additionally, 41% of the debt was covered within a band through interest rate collar hedging.

The average debt maturity at the end of 2024 was 2 years, compared to 2 years and 8 months at the end of 2023.

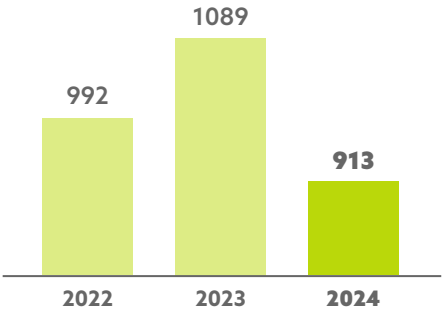
Between December 2023 and January 2024, NOS secured sustainability-linked loans totalling €300 million, with maturities in 2025 (€120 million) and 2026 (€180 million). Through these transactions, NOS tangibly links the cost of its debt to its sustainability performance, reinforcing and reflecting its strategic commitment across all levels of the organisation to achieving best-in-class ESG (Environmental, Social, and Governance) targets.

Currently, 92% of NOS's contracted debt is secured through sustainable financing.

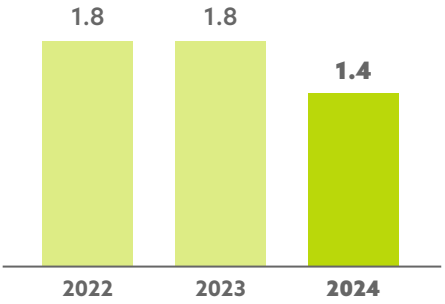
In July, NOS's long-term credit rating was reaffirmed by S&P and Fitch at BBB- (Stable Outlook) and BBB (Stable Outlook), respectively.

Maintaining this credit rating enhances NOS's ability to diversify its funding sources, extend the average debt maturity, and keep its average cost of debt at a competitive level.

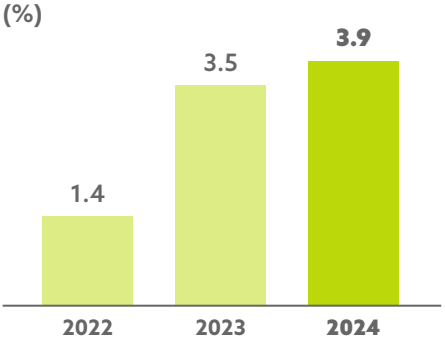
Net Financial Debt
(M€)



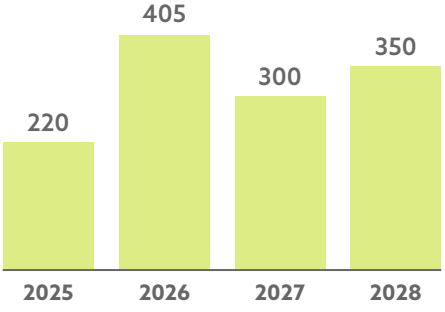
Net Financial Debt/ EBITDA AL
(X)



Average cost of Debt
(%)



Debt maturity
(M€)



Shareholder Returns and Distribution Proposal

Throughout 2024, NOS strengthened its commitment to regular and transparent communication with key capital market stakeholders. The Investor Relations and Sustainability team actively engaged with investors and analysts through various interactions, both in-person and virtual, including national and international conferences and roadshows.

Stock Performance and Shareholder Returns

At the end of 2024, NOS's share price stood at €3.330 per share, representing an increase of 4.1% compared to the end of 2023. As a result of 2023's financial performance, an ordinary dividend of €0.350 per share was distributed on 24 April, representing an underlying dividend yield of 10.6% on the announcement date. Combining share price performance throughout 2024 and the dividend payment in April, NOS delivered a total shareholder return (TSR) of 15.0%.

NOS's share price fluctuated between a low of €3.136 and a high of €3.675, closing the year at €3.330, with a market capitalisation of €1.715 billion.

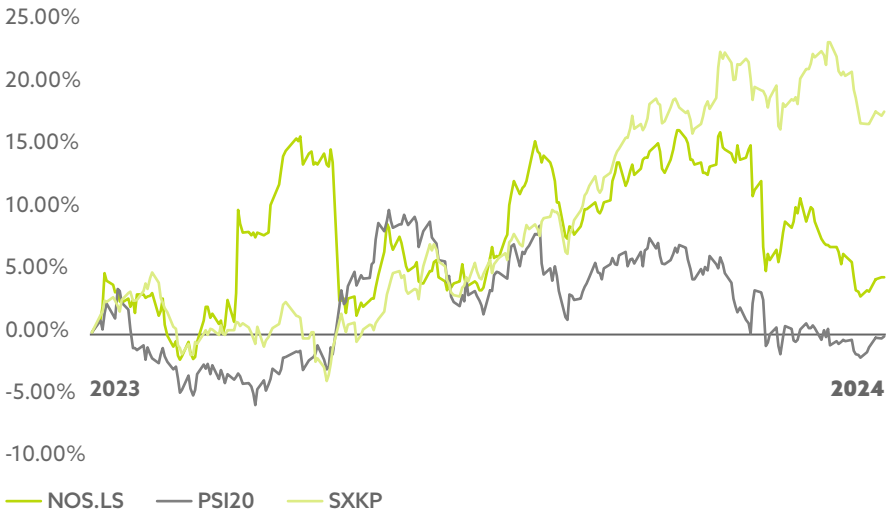
Performance vs Peers

The benchmark indices used by NOS for comparative performance analysis are based on geographical and sectoral criteria. For geographical comparison, NOS uses the PSI Index, which reflects the performance of the most traded stocks on Euronext Lisbon. For sectoral comparison, NOS references the EuroStoxx Telco Index, the leading benchmark for European telecommunications companies.

In 2024, NOS outperformed the PSI Index by 4.4 percentage points, standing out by surpassing most of the index's constituents during the period. However, NOS underperformed the EuroStoxx Telco Index by 12.2 percentage points, impacted by the 32.83% appreciation of Deutsche Telekom, the largest constituent of the index, which holds a weighting of over 45% due to its free float-based selection criteria.

Stock performance

(%)



Performance

+4.4pp

In 2024, NOS outperformed the PSI Index by 4.4 percentage points, standing out by surpassing most of the index's constituents during the period.

Analyst Recommendations

As of 31 December 2024, there were 16 sell-side analysts from different financial institutions with active and independent coverage of NOS.

At the end of the year, 38% of analysts recommended buying, 44% recommended holding, and 19% recommended selling NOS shares. The consensus target price at the end of 2024 was €3.934 per share, representing a significant upside potential of 18.1% compared to the closing price of €3.330 on 31 December 2024. All recommendations and target prices presented are independently produced by external analysts and are available on NOS's corporate website, ensuring full transparency and easy access to information.

Proposal for Distribution of Results

Considering that, for the financial year ended 31 December 2024, the net profit for the year, as recorded in the individual accounts of the Company, amounted to €194,763,087.94, and that this amount already reflects the fact that the Company, in accordance with applicable accounting standards, has recognised in its accounts for the year the sum of €1,610,403.00, allocated, pursuant to Article 14(3) of the Company's Articles of Association, to the distribution of profits to the Directors,

It is proposed that, given the current financial and equity position of NOS, the following resolution be adopted:

1. From the net profit for the financial year, distributable under Articles 32 and 33 of the Portuguese Commercial Companies Code, amounting to 194,763,087.94 Euros, an allocation of 9,738,154.40 Euros shall be transferred to Legal Reserves, 4,718,450.54 Euros shall be transferred to Free Reserves, and the remaining amount shall be distributed to Shareholders as ordinary dividends for the 2024 financial year, totalling 180,306,483.00 Euros (equivalent to 0.35 Euros per share, based on the number of issued shares).

2. Due to the completion of the sale of an additional portfolio of mobile network sites, along with the corresponding financial proceeds and extraordinary gains realised in 2024, and reflected in NOS's financial position, an amount of €25,758,069.00 shall be paid to shareholders from Free Reserves, as an extraordinary dividend for the 2024 financial year (equivalent to €0.05 per share, based on the number of shares issued).

3. As it is not possible to determine the exact number of treasury shares held by the Company at the time of the above-mentioned payments, the total amount of €206,064,552.00 calculated in the previous paragraphs—based on a unit amount per issued share (€0.40 per share)—shall be distributed as dividends as follows:

- **a.** Each issued share shall receive the unit amount of €0.40, which formed the basis for this proposal;
- **b.** No payment shall be made on shares that, on the first day of the payment period, are held by the Company itself, and the corresponding amount shall be transferred to Free Reserves.

4. Pursuant to Article 14(3) of the Company's Articles of Association, and as profit participation, an amount of €1,610,403.00 shall be allocated to the Directors.

Additional Information

- Chapters 1.1 Highlights and 1.2 Year in Review form an integral part of the Integrated Management Report, while Chapter 1.3 Non-Financial Statement consolidates all information related to sustainability.
- The business evolution and company performance are described in Section 1.1 Review of Our Performance in the Year, as well as the management developments across different business sectors, which are also available in Section 1.1 Review of Our Performance in the Year, within the Year in Review chapter.
- The identification of key risks and uncertainties faced by the company can be found in the Corporate Governance Report (CGR), Section 53, titled "Identification and description of the main types of risks (economic, financial, and legal) to which the company is exposed in the course of its activity".
- The financial risk management policies are detailed in the Notes to the Financial Statements, under the section "Policies and Risk Management", while the description of internal control and risk management systems related to financial reporting is included in the CGR, Section 55, titled "Key elements of the internal control and risk management systems implemented by the company regarding the financial reporting process".
- Significant events occurring after the end of the financial year are presented in the Consolidated Financial Statements – Annex, Section 50 "Subsequent Events".
- Information on the acquisition and disposal of treasury shares is available in the Individual Financial Statements.
- The company complies with the applicable legislation regarding transactions between the company and its directors, as stipulated in Article 397 of the Portuguese Companies Code.
- The existence of branches is detailed in the Consolidated Financial Statements – Annexes, Section 51.
- Shares and bonds held by members of the management and supervisory bodies are disclosed in the Corporate Governance Report, Section A.II – Shareholdings and Bonds Held.
- The company declares that there are no outstanding debts to Social Security or the Tax Authorities.

1.2.2 Sustainability

Status of Commitments and Goals of the 2021-2025 Strategy

The year 2024 marked a period of deep reflection on NOS's Sustainability Strategy. This exercise allowed us to assess the progress made so far, identify current challenges, and define the impact we aspire to achieve in the future.

By reviewing the commitments made under our 2021-2025 Sustainability Strategy, we confirmed that most of the initially defined priorities remain aligned with NOS's vision and values. However, 2024 was also a year of transformation and renewed ambition. We have strengthened our commitments, placing greater emphasis on amplifying our positive impact on society, integrating our technologies as enablers of progress, and accelerating solutions that bring benefits to both people and the environment.

Pillar	Commitment	Strategic Target	Status
A more connected society	Ensuring Widespread Digital Access Through Network and Service Expansion	Increase the percentage of the population covered by 5G by 2025 (indoor/outdoor)	97.1% 99.6%
More for our people	Promoting Diversity in All Its Dimensions and Fostering an Inclusive Mindset at NOS	40% of women in management positions by 2030 (≥ Manager level)	33.8%
On behalf of the planet	Increasing Energy Efficiency in Operations	-70% by 2025 and -80% by 2030 vs. 2019 in energy consumed per TB of data traffic (SBTi baseline year)	-62%
	Using Renewable Electricity to Meet Our Energy Needs	100% by 2030	50%
	Reducing Carbon Footprint in Line with Climate Science	-80% GHG emissions (Scope 1 & 2) by 2025, and -90% by 2030, compared to 2019 (SBTi baseline year)	-21%
		-30% GHG emissions (Scope 3) by 2030, compared to 2019 (SBTi baseline year)	-46%
	Fleet Electrification	100% by 2030	44% of vehicles in the company-owned fleet already electrified
	Promoting Circularity in NOS's Business by encouraging the reuse, resale, or recycling of network and customer equipment.	By 2030, equipment take-back should correspond to at least 20% of new equipment distributed to customers.	53% on fixed equipment
Responsible Leadership	Acting Ethically and Responsibly with Our Employees, Customers, Suppliers, and Business Partners	Positive employee evaluation of the company's ethical performance between 2022 – 2025	91%

Key ESG Achievements

A more connected society

ZER01 Project

The third edition of the ZER01 Project, which provides free computing education in schools, will impact 2,500 students in the 2024/2025 academic year.

This NOS social responsibility initiative, developed in partnership with ENSICO, reflects the operator's commitment to promoting essential skills for the digital society we live in—skills that go far beyond simply using electronic devices.



First Edition
2022-2023

18 classes from elementary and middle school

7 schools

Douro
São Domingos de Rana (Região de Lisboa)
Gondomar (Região do Porto)

Second Edition
2023-2024

54 classes from elementary and middle school

13 schools

45 teachers in training

Arcos de Valdevez
Bragança
Gondomar
Vila do Conde
Mirandela
São João da Pesqueira

Third Edition
2024-2025 (current)

110 classes from elementary and middle school

24 schools

95 teachers in training

Arco de Valdevez
Bragança
Gondomar
Vila do Conde
Mirandela
Monção
São João da Pesqueira
Cascais



5G for good

Humanising technology and placing it at the service of those who need it most. Our initiatives push the limits of technology in real-world applications, creating a profound impact on people's lives. In 2024:

"Colete das emoções" at NOS Alive

NOS introduced Portugal's first inclusive festival experience for Deaf individuals at NOS Alive, featuring haptic vests and real-time Portuguese Sign Language interpretation, made possible by 5G.

Pata à Porta

NOS launched this animal adoption platform, leveraging Augmented Reality (AR) and 5G technology to provide a more immersive way to connect with animals in need of adoption.

More than
22,000
People impacted

Over
500,000€
in community support initiatives

More than
40
third-sector organisations impacted



Find out more
in the sections "ESRS S3 – Affected Communities" and "ESRS S4 – Consumers and end-users".

More for our people

85%
NOS recommendation index as a great place to work

76%
Work-life balance index

33.8%
Women in management roles (directors and managers), maintaining the ambition to reach 40% by 2030

32,120 h
Total training hours

Health and Well-being Programme

In 2024, NOS continued to expand the reach of its NOS VITA Programme in its three dimensions – physical health, emotional health, and social health. Reflecting a personalised, holistic, impactful, and sustainable approach, various initiatives were developed to inspire choices, empower change, and facilitate employee access to well-being activities.

Informative content, written and audiovisual, and best practices were shared on topics such as stress management, emotional intelligence, and financial education. We also marked Health and Well-being Days, as well as Health Month.

Diversity and Inclusion Initiatives:

- Membership in iGen Forum for Equal Organisations
- Diversity Seal & Honourable Mention by APPDI
- Renewal of partnership with PWN
- Renewal of partnership with APPDI
- Inclui conNOSco Podcast
- Inspiring Talks
- Extraordinary Women in Tech Conference
- Diversity Month
- Post-parental leave reintegration support
- 12th Grand Conference on Female Leadership
- Awareness and sensitisation sessions
- Neurodiversity Programme
- Cinemas & Valor T Project
- Strong HER - Self-esteem Club
- Women in Tech KIDS workshops
- STEM Labs – Engineers for a Day

Talent Management

NOS Alfa Programme

To enhance the employee experience, NOS has reinforced its commitment to young talent development and the promotion of internal growth opportunities. In 2024, the company welcomed 48 new trainees in the NOS Alfa programme—the highest number since the initiative's inception—and integrated 94 curricular and summer internships, reinforcing its position as a reference for attracting and developing young talent.

The NOS Alfa Trainee Programme, lasting a total of 12 months, offers participants an immersive experience through rotations across two business areas, complemented by a structured mentoring programme and personalised training. The programme has continuously evolved, aligning with business needs and emerging labour market realities.

The onboarding week received highly positive feedback, with an overall rating of 4.9 out of 5, reinforcing the effectiveness of the adopted model.

Internal Mobility Programme

NOS also maintains its Internal Mobility Programme, allowing employees to explore new roles, acquire new skills, and gain greater visibility within the organisation. This initiative facilitates horizontal career moves, promotes a broader understanding of the business, and enhances opportunities for progression. Since 2020, 793 mobility actions have been implemented, with an 8.6% internal mobility rate in 2024, demonstrating the positive impact of this strategy.



Find out more
in the sections "ESRS S1 – Own Workforce"

On behalf of the Planet

Energy Efficiency Enhancements

The acceleration of the energy rationalisation programme reduced operational consumption and improved the energy efficiency of telecommunications services. Several network enhancements and modifications were implemented to increase efficiency, including dynamic soft and hard shutdown mechanisms for mobile stations (4G and 5G – Cell Sleep Mode and Deep Sleep in radio equipment), optimising resource use while maintaining service quality and coverage redundancy (Power Saving Features). These measures have led to reduced energy consumption.

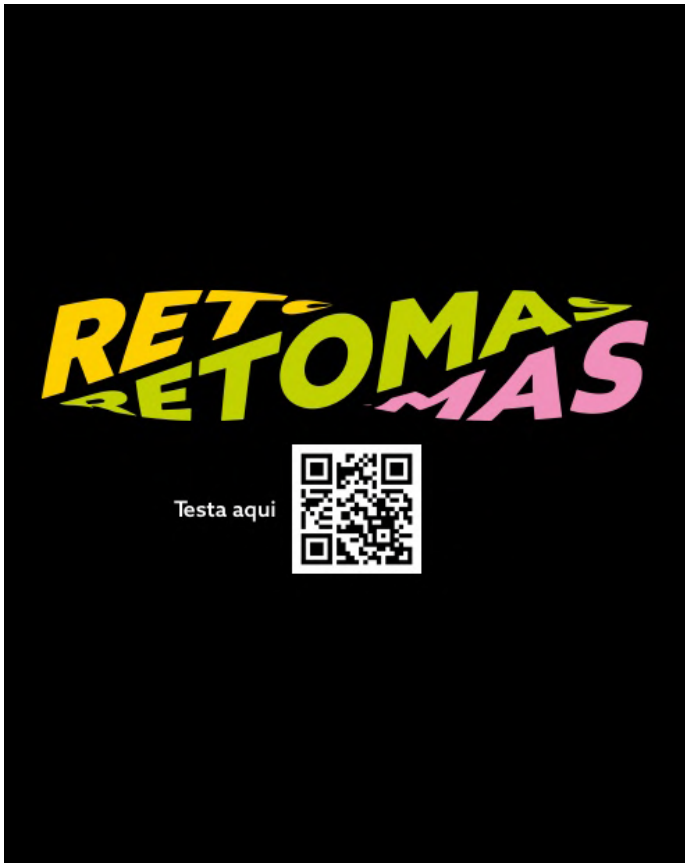
Additionally, the mobile and fixed network infrastructure was modernised with next-generation power systems, reducing consumption by 5–10%. Microgeneration solutions were installed at technical sites to produce local energy, and airflow zoning improvements were implemented in technical rooms to lower HVAC energy use.

Additionally, significant improvements have been made in fleet electrification, with 44% of company-owned vehicles now electrified (41% plug-in hybrid and 3% EV), reflecting ongoing efforts to enhance sustainability in operations.



44%
of company-owned vehicles now electrified

53%
of all boxes and routers installed in customer homes were refurbished equipment in 2024



Launch of the Mobile Device Trade-In Programme

NOS introduced a trade-in programme reinforcing its commitment to sustainability and the circular economy by promoting smartphone reuse. Launched in 10 pilot stores, this initiative provides a seamless and efficient experience for customers. Using a dedicated app, customers can assess their smartphone's condition, receive a voucher for its value, and use it towards purchasing a new device in-store.

10
This initiative was launched in 10 pilot stores

One Purchase = One Tree

First introduced in 2022, this initiative continued in 2024 with two promotional campaigns, converting sales of NOS products and services into over 24,000 trees to be planted, adding to the 46,000 trees planted in 2022 and 2023.

46,000
trees planted in 2022 and 2023.



Find out more
in the sections "ESRS E1 – Climate change" and "ESRS E5 – Resource use and circular economy".

Responsible Leadership

"Let's Talk About Ethics"

Open knowledge-sharing sessions on corporate ethics for employees, featuring participation from the Ethics Committee. The 2024 edition focused on Psychological Safety and included an external guest expert.

250
Participants

4.6
Overall session rating

4.8
Relevance of the initiative and topics covered

100%
of suppliers were informed of sustainability requirements.

91%
Employee satisfaction with NOS's ethical conduct

E-learning on Ethics

By the end of 2024, 97% of NOS employees had completed this training, maintaining the same percentage as in 2023.

ESG Evaluation of Suppliers

As part of the new ESG performance assessment system for the supply chain, 174 suppliers were evaluated.

174
Suppliers evaluated

E-learning on S&P

The training plan continues to be implemented for all employees and partners, including e-learning modules on 'Security & Privacy.'

83%
of employees completed the S&P module

Find out more
in the sections "ESRS S4 – Consumers and end-users" and "ESRS G1 – Business Conduct".

INTEGRATED MANAGEMENT REPORT

1.3 NON-FINANCIAL STATEMENT

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1.3.1 ESRS 2 – GENERAL DISCLOSURES

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1.3.1. ESRS 2 – General Disclosures

1.3.1.1 Basis of preparation (BP-1)

The NOS Integrated Annual Report for the year 2024 presents the Group's integrated performance, framed by its strategic vision for the future and a unique management model that enhances value creation for stakeholders. This report covers the period from 1 January to 31 December 2024 and has been prepared in accordance with the Corporate Sustainability Reporting Directive (EU) 2022/2464, based on the consolidation scope and inclusion of the value chain.

The Sustainability Statements included in this report follow the requirements of the European Sustainability Reporting Standards (ESRS), complying with specific reporting standards and reflecting the materiality practices adopted by NOS. Where applicable, data from previous years has been used to enable performance comparison and provide context for decisions, actions, and results. In line with the progressive omission options allowed for the first year of application, some data from previous years may not be available.

External verification

The Sustainability Statements are subject to an independent external audit conducted by KPMG & Associados – Sociedade de Revisores Oficiais de Contas, S.A.. This verification assessed the compliance and reliability of the disclosed information in accordance with the ESRS, providing additional assurance on the adequacy, balance, and transparency of the group's reporting.

For further details, refer to section "1.3.5.2. External Verification Statement".

It is important to highlight that, in addition to the mandatory information included in this report, other relevant and voluntary content can be accessed on the company's website at www.nos.en/institutional.

General basis for the preparation of sustainability statements

Scope

(BP-1_01) The NOS sustainability statement has been prepared on a consolidated basis, covering the companies included in the Group's Consolidated Financial Statements (CFS). This scope includes all entities in which the Group holds a stake of more than 50% and exercises management control, with these entities being consolidated under the full consolidation method. The companies listed in Block "A" of note 50 of the CFS are included, except for Lusomundo Moçambique.

Regarding employees, the information covers all direct employees, excluding cinema operations staff, internship contracts, and governance bodies. In the environmental scope, Group companies whose context, activity, or size are considered immaterial for environmental performance—such as NOS Sistemas España, Per-Mar, Sontária, NOS Mediação de Seguros, Teliz Holding, Lusomundo - Sociedade de Investimentos Imobiliários SGPS, SA, and Fundo NOS 5G—are excluded from the data collection process.

(BP-1_02 / BP-1_03) The consolidation scope for the sustainability statement is consistent with that of the consolidated financial statements, and all Group companies are included in the consolidated sustainability report prepared by the parent company. This report fully complies with the requirements of Directive 2013/34/EU and applicable European reporting standards. Accordingly, no subsidiaries are excluded or exempted from submitting individual or consolidated sustainability reports, as outlined in Articles 19a(9) and 29a(8) of the directive.

(BP-1_04) NOS ensures that, whenever possible, the sustainability statement covers the entire value chain, both upstream and downstream. The materiality assessment was developed considering the entire value chain, with continuous efforts to incorporate associated impacts, reflecting the company's commitment to comprehensive reporting aligned with international best practices.

(BP-1_05) In compliance with transparency requirements, the company has not exercised the option to omit any information related to intellectual property, know-how, or innovation results. All relevant information has been fully disclosed, ensuring alignment with applicable standards and promoting transparency in sustainability disclosures.

(BP-1_06) Additionally, NOS has not applied for the exemption under Articles 19.º-A, n.º 3, and 29.º-A, n.º 3 of Directive 2013/34/EU, regarding the non-disclosure of imminent events or ongoing negotiations. All relevant information has been fully reported in compliance with regulatory requirements.

1.3.1.2 Disclosure of information in specific circumstances (BP-2)

Time horizons

(BP-2_01) NOS fully adheres to the definitions established by the ESRS standards regarding short-, medium-, and long-term time horizons. The short-term is defined as the same period as the company's financial reporting period (maximum of 1 year), the medium-term ranges from 1 to 5 years, and the long-term refers to periods beyond 5 years. There are no deviations from these definitions.

Material topics

(BP-2_21) As part of its materiality assessment, NOS has conducted a rigorous process to identify the most relevant sustainability topics, based on their significant impact on stakeholders and their influence on business decisions.

The topics identified as material will be detailed throughout the Sustainability Statements, with specific disclosures aligned with the ESRS guidelines. For topics not considered material, NOS will continue to monitor and assess their relevance, ensuring adaptation to changes in the operational context and stakeholder expectations.

Value chain estimates

In section "E1 - Climate Change", we disclose metrics related to Scope 3 greenhouse gas (GHG) emissions, identifying categories with the greatest impact. Categories 1 and 2 are the most significant contributors to these emissions, partially relying on estimates—based on the application of financial ratios to Opex and Capex values—to calculate the lifecycle emissions of products, services, and fixed assets upstream of NOS's operations. Approximately 80% of emissions from the production and transportation of customer equipment (e.g. mobile phones, TV boxes, routers, and televisions) are calculated using primary data from manufacturers.

The methodology applied to all Scope 3 GHG emission estimates is detailed in section "1.3.2.1.5. Climate change mitigation and adaptation targets (E1-4)", under the highlight "Accounting principles".

Cross-references

(BP-2_20 / IRO-2_01) The company adopts a transparent approach to information disclosure and, where necessary, uses cross-references to specific corporate documents to meet ESRS reporting requirements. These references will primarily direct to three key document sources:

- Corporate Governance Report, detailing the governance structure and practices, as well as corporate policies and procedures relevant to sustainability matters.
- Chapter 1 of the Management Report, which provides a strategic overview of the company's performance, business model, and integration of sustainability into the global strategy.

Where cross-references are made, the relevant section and page number will be clearly identified, ensuring traceability and accessibility of information for all stakeholders.

Disclosure requirements	Section
ESRS 2 - BP-1 - General basis for the preparation of sustainability statements	Location: NFS - 1.3.1.1 Basis of preparation (BP-1) Cross-reference: NFS - 1.3.5.2 External Verification Statement
ESRS 2 - BP-2 - Disclosures related to specific circumstances	Location: NFS - 1.3.1.2 Disclosures of information under specific circumstances (BP-2) Cross-reference: NFS - 1.3.2.1.5 Targets related to climate change mitigation and adaptation (E1-4)
ESRS 2 - GOV-1 - Role of governance, management, and supervisory bodies	Location: 1.3.1.3 The role of administrative, management, and supervisory bodies (GOV-1) Cross-reference: CGS - 68. Knowledge and experience of members; III. Internal Control and Risk Management; 17. Composition of the Board of Directors; 18. Distinction between executive and non-executive board members and identification of independent members

Disclosure requirements	Section
ESRS 2 - GOV-2 - Information provided and sustainability matters addressed by governance and supervisory bodies	Location: 1.3.1.4 Sustainability matters addressed by the company's governance and supervisory bodies (GOV-2) Cross-reference: CGS - III. Internal Control and Risk Management
ESRS 2 - GOV-3 - Integration of sustainability performance into incentive schemes	Location: 1.3.1.5 Sustainability criteria in incentive schemes (GOV-3)
ESRS 2 - GOV-4 - Statement on due diligence regarding sustainability	Location: 1.3.1.6 Due diligence statement (GOV-4)
ESRS 2 - GOV-5 - Risk management and internal controls in sustainability reporting	Location: 1.3.1.7 Risk management and internal control in sustainability reporting (GOV-5) Cross-reference: CGS - III. Internal Control and Risk Management
ESRS 2 - SBM-1 - Strategy, business model, and value chain	Location: 1.3.1.8 Strategy, business model, and value chain (SBM-1) Cross-reference: Highlights - 1.5 Activity and Portfolio; 1.6 Our Strategy; 1.7 Our Sustainability Strategy Year in Review - 2.1 Sustainability NFS - 1.3.3.1.7 NOS Workforce Characteristics (S1-6)
ESRS 2 - SBM-2 - Stakeholder interests and perspectives	Location: 1.3.1.9 Stakeholder interests and perspectives (SBM-2)
ESRS 2 - SBM-3 - Material impacts, risks, and opportunities and their interaction with strategy and business models	Location: 1.3.1.10 Impacts, Risks, and Opportunities (SBM-3)
ESRS 2 - IRO-1 - Description of the processes for identifying and assessing material impacts, risks, and opportunities	Location: 1.3.1.11 Double Materiality Analysis Process (IRO-1) Cross-reference: 1.3.2.1.2 Material impacts, risks, and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3/IRO-1); 1.3.2.2.1 Management of impacts, risks, and opportunities (IRO-1); 1.3.4.1.1. Management of impacts, risks, and opportunities (IRO-1)
ESRS 2 - IRO-2 - Disclosure requirements covered by the company's sustainability statements	Location: NFS - 1.3.1.2 Disclosures of information under specific circumstances (BP-2)
ESRS E1 - GOV-3 - Integration of sustainability performance into incentive schemes	Location: 1.3.1.3 The role of governance, management, and supervisory bodies (GOV-1)
ESRS E1 - E1-1 - Climate change mitigation transition plan	Location: 1.3.2.1.1 Climate Change Transition Plan (E1-1)
ESRS E1 - SBM-3 - Material impacts, risks, and opportunities and their interaction with strategy and business model	Location: 1.3.2.1.2 Material impacts, risks, and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3/IRO-1)
ESRS E1 - E1-2 - Policies related to climate change mitigation and adaptation	Location: 1.3.2.1.3 Policies (E1-2) Cross-reference: NFS - 1.3.1.12 Policies (MDR-P)
ESRS E1 - E1-3 - Actions and resources related to climate change policies	Location: 1.3.2.1.4 Actions and resources related to climate change policies (E1-3)
ESRS E1 - E1-4 - Targets related to climate change mitigation and adaptation	Location: 1.3.2.1.5 Targets related to climate change mitigation and adaptation (E1-4)
ESRS E1 - E1-5 - Energy consumption and energy mix	Location: 1.3.2.1.6 Energy consumption and energy mix (E1-5)
ESRS E1 - E1-6 - Gross GHG emissions for Scope 1, 2, 3, and total GHG emissions	Location: 1.3.2.1.7 Gross GHG emissions for Scope 1, 2, 3, and total GHG emissions (E1-6)
ESRS E5 - IRO-1 - Description of the processes for identifying and assessing material impacts, risks, and opportunities related to resource use and circular economy	Location: 1.3.1.11 Double Materiality Analysis Process (IRO-1)

Disclosure requirements	Section
ESRS E5 - E5-1 - Policies related to resource use and circular economy	Location: 1.3.2.2.2 Policies (E5-1) Cross-reference: NFS - 1.3.1.12 Policies (MDR-P)
ESRS E5 - E5-2 - Actions and resources related to resource use and circular economy	Location: 1.3.2.2.3 Actions and resources related to resource use and circular economy (E5-2)
ESRS E5 - E5-3 - Targets related to resource use and circular economy	Location: 1.3.2.2.4 Targets and metrics related to resource use and circular economy (E5-3)
ESRS E5 - E5-4 - Resource inputs	Location: 3.2.2.5 Resource Inputs (E5-4)
ESRS E5 - E5-5 - Resource outputs	Location: 3.2.2.6 Resource Outputs (E5-5)
ESRS S1 - SBM-2 - Stakeholder interests and perspectives	Location: 1.3.1.9 Stakeholder interests and perspectives (SBM-2)
ESRS S1 - SBM-3 - Material impacts, risks, and opportunities and their interaction with strategy and business model	Location: 1.3.1.10 Impacts, Risks, and Opportunities (SBM-3)
ESRS S1 - S1-1 - Policies related to the company's workforce	Location: 1.3.3.1.2 Policies (S1-1) Cross-reference: NFS - 1.3.1.12 Policies (MDR-P)
ESRS S1 - S1-2 - Processes for engaging with the company's workforce and worker representatives on impacts	Location: 1.3.3.1.3. Engagement with employees and worker representatives on impacts (S1-2)
ESRS S1 - S1-3 - Processes for addressing negative impacts and channels for employees to raise concerns	Location: 1.3.3.1.4. Processes for remedying negative impacts and channels for employees to express concerns (S1-3) Cross-reference: NFS - 1.3.4.1.1. Policies (G1-1)
ESRS S1 - S1-4 - Actions taken to address material impacts on the workforce and approaches to mitigating material risks and seeking material opportunities related to the workforce, as well as the effectiveness of those measures	Location: 1.3.3.1.5. Workforce impact management measures (S1-4)
ESRS S1 - S1-5 - Targets related to managing material negative impacts, promoting positive impacts, and managing material risks and opportunities	Location: 1.3.3.1.6. Targets related to managing material negative impacts, promoting positive impacts, and managing material risks and opportunities (S1-5)
ESRS S1 - S1-6 - Characteristics of the company's salaried employees	Location: 1.3.3.1.7. Characteristics of NOS employees (S1-6)
ESRS S1 - S1-9 - Diversity metrics	Location: 1.3.3.1.8. Diversity metrics (S1-9)
ESRS S1 - S1-10 - Adequate wages	Location: 1.3.3.1.9. Adequate wages (S1-10)
ESRS S1 - S1-14 - Health and safety metrics	Location: 1.3.3.1.10. Health and safety metrics (S1-14)
ESRS S2 - SBM-2 - Stakeholder interests and perspectives	Location: 1.3.1.9. Stakeholder interests and perspectives (SBM-2)
ESRS S2 - SBM-3 - Material impacts, risks, and opportunities and their interaction with strategy and business model	Location: 1.3.3.2.1. Impacts, Risks, and Opportunities (ESRS 2 SBM-3)
ESRS S2 - S2-1 - Policies related to workers in the value chain	Location: 1.3.3.2.2. Policies (S2-1) Cross-reference: NFS - 1.3.1.12. Policies (MDR-P); 1.3.3.1.2. Policies (S1-1)
ESRS S2 - S2-2 - Processes for engaging with value chain workers on impacts	Location: 1.3.3.2.3. Engagement with value chain workers (S2-2) Cross-reference: NFS - 1.3.3.1.4. Processes for remedying negative impacts and channels for workers to raise concerns (S1-3); 1.3.4.1.1. Policies (G1-1)
ESRS S2 - S2-3 - Processes for addressing negative impacts and channels for value chain workers to raise concerns	Location: 1.3.3.2.4. Processes for remedying negative impacts and channels for value chain workers to express concerns (S2-3) Cross-reference: NFS - 1.3.4.1.1. Policies (G1-1)

Disclosure requirements	Section
ESRS S2 - S2-4 - Actions taken on material impacts on value chain workers and approaches to managing material risks and seeking material opportunities related to value chain workers, and the effectiveness of those actions	Location: 1.3.3.2.5. Value chain worker impact management measures (S2-4) Cross-reference: NFS - 1.3.4.1.1. Policies (G1-1)
ESRS S2 - S2-5 - Targets related to managing material negative impacts, promoting positive impacts, and managing material risks and opportunities	Location: 1.3.3.2.5. Targets related to managing material negative impacts, promoting positive impacts, and managing material risks and opportunities (S2-5)
ESRS S3 - SBM-2 - Stakeholder interests and perspectives	Location: 1.3.1.9. Stakeholder interests and perspectives (SBM-2)
ESRS S3 - SBM-3 - Material impacts, risks, and opportunities and their interaction with strategy and business model	Location: 1.3.3.3.1. Impacts, Risks, and Opportunities (ESRS 2 SBM-3)
ESRS S3 - S3-1 - Policies related to affected communities	Location: 1.3.3.3.2. Policies (S3-1) Cross-reference: NFS - 1.3.1.12. Policies (MDR-P); 1.3.3.1.2. Policies (S1-1); 1.3.3.2.2. Policies (S2-1)
ESRS S3 - S3-2 - Processes for engaging with affected communities on impacts	Location: 1.3.3.3.3. Engagement with affected communities (S3-2)
ESRS S3 - S3-3 - Processes for addressing negative impacts and channels for affected communities to raise concerns	Location: 3.3.3.4. Processes for remedying negative impacts and channels for affected communities to express their concerns (S3-3) Cross-reference: NFS - 1.3.1.9. Stakeholder interests and perspectives (SBM-2)
ESRS S3 - S3-4 - Actions taken on material impacts on affected communities and approaches to managing material risks and seeking material opportunities related to affected communities, and the effectiveness of those actions	Location: 1.3.3.3.4. Material impact management measures for affected communities (S3-4)
ESRS S3 - S3-5 - Targets related to managing material negative impacts, promoting positive impacts, and managing material risks and opportunities	Location: 1.3.3.3.5. Targets related to managing material negative impacts, promoting positive impacts, and managing material risks and opportunities (S3-5)
ESRS S4 - SBM-2 - Stakeholder Interests and Perspectives	Location: 1.3.1.9. Stakeholder Interests and Perspectives (SBM-2)
ESRS S4 - SBM-3 - Material Impacts, Risks, and Opportunities and Their Interaction with Strategy and Business Model	Location: 1.3.3.4.1. Impacts, Risks, and Opportunities (ESRS 2 SBM-3)
ESRS S4 - S4-1 - Policies Related to Consumers and End Users	Location: 1.3.3.4.2. Policies (S4-1) Cross-reference: NFS - 1.3.1.12. Policies (MDR-P); 1.3.3.1.2. Policies (S1-1); 1.3.3.2.2. Policies (S2-1)
ESRS S4 - S4-2 - Processes for Engaging with Consumers and End Users on Impacts	Location: 1.3.3.4.3. Engagement with Consumers and End Users (S4-2)
ESRS S4 - S4-3 - Processes for Addressing Negative Impacts and Channels for Consumers and End Users to Raise Concerns	Location: 1.3.3.4.4. Processes for Remedying Negative Impacts and Channels for Consumers and End Users to Express Concerns (S4-3)
ESRS S4 - S4-4 - Actions Taken on Significant Impacts on Consumers and End Users, Approaches to Managing Material Risks and Seeking Material Opportunities Related to Consumers and End Users, and the Effectiveness of These Actions	Location: 1.3.3.4.5. Consumer and End User Impact Management Measures (S4-4)

Disclosure requirements	Section
ESRS S4 - S4-5 - Targets Related to Managing Material Negative Impacts, Promoting Positive Impacts, and Managing Material Risks and Opportunities	Location: 1.3.3.4.6. Targets Related to Managing Material Negative Impacts, Promoting Positive Impacts, and Managing Material Risks and Opportunities (S4-5)
ESRS G1 - GOV-1 - Role of Governance, Supervisory, and Management Bodies	Location: 1.3.1.3. Role of Governance and Supervisory Bodies (GOV-1)
ESRS G1 - IRO-1 - Description of Processes for Identifying and Assessing Material Impacts, Risks, and Opportunities	Location: 1.3.1.11. Double Materiality Assessment Process (IRO-1)
ESRS G1 - G1-1 - Corporate Culture and Business Conduct Policies	Location: 1.3.4.1.1. Policies (G1-1) Cross-reference: NFS - 1.3.1.12. Policies (MDR-P)
ESRS G1 - G1-2 - Management of Supplier Relations	Location: 1.3.4.1.2. Supplier Relationship Management (G1-2)
ESRS G1 - G1-6 - Payment Practices	Location: 1.3.4.1.3. Payment Practices (G1-6)

Governance

1.3.1.3 Role of governance and supervisory bodies (GOV-1)

(GOV-1_03) Worker representation in governance and supervisory bodies

The composition of governance, management, and supervisory bodies does not currently include direct representation of salaried workers or other employees. The company's governance structure follows the reinforced Latin model, in which members of the Board of Directors, Executive Committee, and associated committees are elected by shareholders or appointed based on their competencies and experience relevant to their roles.

Nevertheless, the company promotes policies and initiatives to enhance representation and diversity in its management positions, including a commitment to achieving 40% female leadership representation by 2030. The company also ensures structured dialogue with employees through internal communication channels and inclusion-promoting practices.

(GOV-1_04 / GOV-1_15 / GOV-1_16 / GOV-1_17) Competencies and training of governance and supervisory bodies

Members of the company's governance, management, and supervisory bodies possess extensive experience relevant to the sectors, products, and geographical markets in which the company operates.

The Board of Directors comprises 15 members with decades of experience in telecommunications, information technology, corporate management, and innovation, covering essential competencies for operating in the company's markets. The Executive Committee includes professionals with specialised backgrounds in technology infrastructure, telecommunications services, marketing, financial management, and compliance, all of which are critical for the company's strategic and operational development. Some members also have direct experience in international markets and managing complex operations, ensuring a global vision aligned with the company's ambitions.

The company's governance, management, and supervisory bodies recognise the importance of ensuring adequate expertise to oversee sustainability matters. To ensure this capability, the company adopts the following approaches.

Recruitment and appointment of qualified members

The selection and appointment process considers diversity of expertise, as outlined in the Internal Policy for the Selection of Governance and Supervisory Body Members, including specific knowledge in sustainability and ESG (Environmental, Social, and Governance). This ensures that members possess relevant experience to oversee the company's critical strategic issues.

Continuous skills development

The competency matrix of the Board of Directors is regularly updated and complemented by continuous training, ensuring that governance bodies have the specialised knowledge required to oversee ESG matters.Through the NOS Campus Corporate Academy, dedicated training programmes are provided to develop competencies in strategic areas, including Advanced Analytics, Generative Artificial Intelligence (Generative AI), and ESG practices. These programmes are regularly updated to incorporate the latest trends and regulatory requirements, strengthening the Board's ability to supervise sustainability-related issues. The competency matrix highlights the following key areas:



Internal Support Committees

In addition to the recruitment and appointment of members with suitable profiles, the company strengthens its ESG oversight capacity through internal support committees, such as the Corporate Governance and Sustainability Committee. This committee, composed of members of the governance bodies, ensures alignment with regulatory requirements and monitors the implementation of ESG initiatives, guaranteeing compliance with ESRS standards and the company's strategic objectives.

External Consultancy and Support

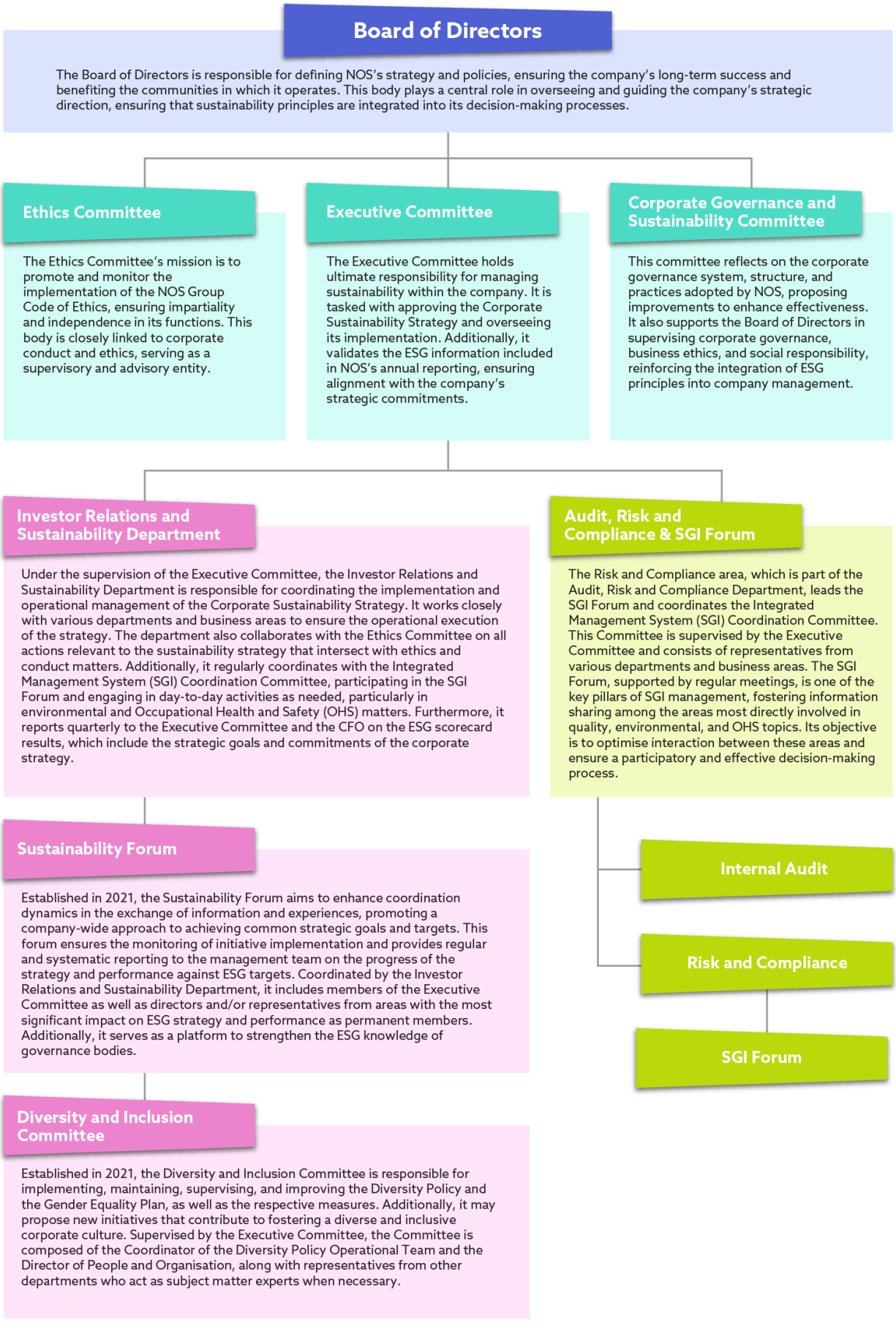
To complement its internal expertise, the company engages external consultants and auditors whenever necessary, ensuring the quality and robustness of strategic decisions related to sustainability.

Through these measures, the company ensures that its governance, management, and supervisory bodies are well-equipped to oversee and promote sustainable practices, contributing to compliance with ESRS standards and the creation of long-term value.

Further information on this topic can be found in the Corporate Governance Report, section "68. Knowledge and experience by members".

(GOV-1_08 / GOV-1_09 / GOV-1_10 / GOV-1_11) Governance bodies, structures, and defined responsibilities for ESG management

NOS structures its sustainability management within an integrated framework of governance bodies, committees, and departments, ensuring a coordinated and cross-functional approach to ESG strategy implementation. In addition to these governance bodies and committees—whose sustainability-related responsibilities are described and available for reference on the company's website—the operational execution of the ESG strategy is carried out by business units and dedicated structures, operating under the supervision of NOS governance bodies and committees. This coordination ensures effective strategic alignment, enabling a consistent and integrated implementation of the company's sustainability commitments.


Board of Directors
The Board of Directors is responsible for defining NOS's strategy and policies, ensuring the company's long-term success and benefiting the communities in which it operates. This body plays a central role in overseeing and guiding the company's strategic direction, ensuring that sustainability principles are integrated into its decision-making processes.
Ethics Committee
The Ethics Committee's mission is to promote and monitor the implementation of the NOS Group Code of Ethics, ensuring impartiality and independence in its functions. This body is closely linked to corporate conduct and ethics, serving as a supervisory and advisory entity.
Executive Committee
The Executive Committee holds ultimate responsibility for managing sustainability within the company. It is tasked with approving the Corporate Sustainability Strategy and overseeing its implementation. Additionally, it validates the ESG information included in NOS's annual reporting, ensuring alignment with the company's strategic commitments.
Corporate Governance and Sustainability Committee
This committee reflects on the corporate governance system, structure, and practices adopted by NOS, proposing improvements to enhance effectiveness. It also supports the Board of Directors in supervising corporate governance, business ethics, and social responsibility, reinforcing the integration of ESG principles into company management.
Investor Relations and Sustainability Department
Under the supervision of the Executive Committee, the Investor Relations and Sustainability Department is responsible for coordinating the implementation and operational management of the Corporate Sustainability Strategy. It works closely with various departments and business areas to ensure the operational execution of the strategy. The department also collaborates with the Ethics Committee on all actions relevant to the sustainability strategy that intersect with ethics and conduct matters. Additionally, it regularly coordinates with the Integrated Management System (SGI) Coordination Committee, participating in the SGI Forum and engaging in day-to-day activities as needed, particularly in environmental and Occupational Health and Safety (OHS) matters. Furthermore, it reports quarterly to the Executive Committee and the CFO on the ESG scorecard results, which include the strategic goals and commitments of the corporate strategy.
Audit, Risk and Compliance & SGI Forum
The Risk and Compliance area, which is part of the Audit, Risk and Compliance Department, leads the SGI Forum and coordinates the Integrated Management System (SGI) Coordination Committee. This Committee is supervised by the Executive Committee and consists of representatives from various departments and business areas. The SGI Forum, supported by regular meetings, is one of the key pillars of SGI management, fostering information sharing among the areas most directly involved in quality, environmental, and OHS topics. Its objective is to optimise interaction between these areas and ensure a participatory and effective decision-making process.
Internal Audit
Risk and Compliance
SGI Forum
Sustainability Forum
Established in 2021, the Sustainability Forum aims to enhance coordination dynamics in the exchange of information and experiences, promoting a company-wide approach to achieving common strategic goals and targets. This forum ensures the monitoring of initiative implementation and provides regular and systematic reporting to the management team on the progress of the strategy and performance against ESG targets. Coordinated by the Investor Relations and Sustainability Department, it includes members of the Executive Committee as well as directors and/or representatives from areas with the most significant impact on ESG strategy and performance as permanent members. Additionally, it serves as a platform to strengthen the ESG knowledge of governance bodies.
Diversity and Inclusion Committee
Established in 2021, the Diversity and Inclusion Committee is responsible for implementing, maintaining, supervising, and improving the Diversity Policy and the Gender Equality Plan, as well as the respective measures. Additionally, it may propose new initiatives that contribute to fostering a diverse and inclusive corporate culture. Supervised by the Executive Committee, the Committee is composed of the Coordinator of the Diversity Policy Operational Team and the Director of People and Organisation, along with representatives from other departments who act as subject matter experts when necessary.

(GOV-1_12 / GOV-1_13 / GOV-1_14) Oversight of ESG impacts, risks, and opportunities

Detailed information on the oversight of ESG impacts, risks, and opportunities at NOS can be found in the Corporate Governance Report, section III. Internal Control and Risk Management.

(GOV-1_01 / GOV-1_02 / GOV-1_05 / GOV-1_06 / GOV-1_07) Diversity of the Board of Directors

The composition of the Board of Directors reflects the company's commitment to diversity and inclusion, incorporating a range of experiences and profiles that ensure effective strategic oversight.

The Board of Directors is composed of 15 members, comprising 7 executive members and 8 non-executive members, ensuring a balance between operational leadership and strategic oversight.

This distribution ensures a balance between operational leadership and strategic oversight. Regarding gender diversity, the composition of the Board of Directors is as follows:

- 66.67% male members (10 members);
- 33.33% female members (5 members);

In 2024, the gender diversity index within the Board of Directors was 0.50.

Further information on the composition of the Board of Directors can be found in the Corporate Governance Report, sections 17. Composition of the Board of Directors and 18. Distinction to be drawn between executive and non-executive directors and details of independent members.

1.3.1.4 Sustainability matters addressed by governance and supervisory bodies (GOV-2)

(GOV-2_01 / GOV-2_02 / GOV-2_03) The Board of Directors, through the Executive Committee and the Corporate Governance and Sustainability Committee, is regularly informed and advised on sustainability matters, including impacts, risks, and material opportunities. During 2024, the Executive Committee analysed and approved several key topics related to sustainability, including:

- Results from the double materiality analysis, identifying the most relevant impacts, risks, and opportunities for the company and its stakeholders.
- Sustainability Strategy for the 2025-2030 strategic cycle, which involved reviewing the key pillars, commitments, objectives, and KPIs for sustainability.

The Corporate Governance and Sustainability Committee also approved these points, acting as the body responsible for supervising and monitoring the implementation of the strategic sustainability plan.

Additionally, the Board of Directors receives quarterly updates during dedicated strategic review meetings. The Corporate Governance and Sustainability Committee receives monthly

updates or more frequently in the event of critical or urgent matters. Comprehensive annual reports on performance and progress are presented at the end of each fiscal year.

The Supervisory Board, as the audit and oversight body, was informed about the processes for preparing, managing, and disclosing the Sustainability Statements, ensuring the company's compliance with regulatory requirements and best reporting practices.

Furthermore, the other governance bodies mentioned in the previous section are naturally involved throughout the year, depending on the specificity of the respective material topics.



Additional information on sustainability matters addressed by governance and supervisory bodies can be found in the Corporate Governance Report, section III. Internal Control and Risk Management.



1.3.1.5 Sustainability criteria in incentive schemes (GOV-3)

(GOV-3_01 / GOV-3_02 / GOV-3_03 / GOV-3_05) NOS recognises the importance of aligning the incentive schemes and remuneration policies of its executive directors with the sustainability objectives defined in its strategic plan. In this regard, the company has implemented mechanisms that integrate ESG (Environmental, Social, and Governance) aspects into performance evaluation and the variable incentive schemes of governance, management, and supervisory body members.

Sustainability-linked incentive schemes

NOS executive directors have a variable remuneration component, corresponding to 50% of the total, which is determined based on two types of indicators:

1. Collective business performance indicators (70% of the variable component): Includes metrics related to the overall performance of the company across different business areas.
2. Qualitative individual performance indicators (30% of the variable component): Includes the achievement of ESG objectives set out in the company's strategic plan.

Although ESG objectives are part of the qualitative assessment, there are currently no specific KPIs exclusively defined for direct evaluation of remuneration.

(GOV-3_04) Sustainability-related objectives and impacts

The performance of executive directors is evaluated considering the ESG objectives defined in NOS's strategic plan. These objectives, aligned with the company's sustainability commitments, include qualitative aspects that reflect the integration of sustainability principles into business management and operations. However, sustainability-related performance metrics are not used as specific reference indices in the calculation of variable remuneration.

(GOV-3_06) Approval and review of incentive schemes

The conditions associated with the incentive schemes of executive directors are approved by the Board of Directors, based on the recommendations of the Remuneration Committee. This

approval process ensures that the incentive schemes are aligned with the company's strategic objectives, including those related to sustainability.

The review of the conditions is conducted periodically, ensuring continuous adaptation to the organisation's needs and market developments, while maintaining NOS's commitment to ESG principles and sustainable performance.

1.3.1.6 Statement on due diligence (GOV-4)

NOS adopts a structured due diligence process, ensuring the identification, assessment, and mitigation of the impacts of its activities on people and the environment. This process is integrated into the sustainability strategy and is supported by policies, procedures, and continuous monitoring mechanisms. The key aspects and stages of the due diligence process are reflected in the Integrated Annual Report, including:

Essential Elements of Due Diligence	Sustainability Statement Points
Integrating due diligence into governance, strategy, and business model	• Point 21 of the Corporate Governance Report • 1.1.5. Activity and Portfolio • 1.1.6. Our Strategy • 1.1.7. Our Sustainability Strategy
Engaging with affected stakeholders at all key stages of the due diligence process	• 1.3.1.9. . Interests and perspectives of stakeholders (SBM-2)
Identifying and assessing negative impacts	• 1.3.1.10. Impacts, Risks, and Opportunities (SBM-3)
Taking measures to address these negative impacts	• Actions and measures taken to address identified impacts are described in each of the material ESRS (E1, E5, S1, S2, S3, S4, and G1). Each standard details the initiatives and strategies implemented to mitigate or remediate negative impacts, aligned with the company's ESG commitments.
Monitoring the effectiveness of these efforts and communicating results	• Metrics and indicators used to monitor the effectiveness of these measures are included in the material ESRS (E1, E5, S1, S2, S3, S4, and S5). These standards establish the key data and monitored results, ensuring transparency and continuous reporting to stakeholders.

1.3.1.7 Risk management and internal control in sustainability reporting (GOV-5)

(GOV-5_01 / GOV-5_02 / GOV-5_03 / GOV-5_04 / GOV-5_05) Detailed information on risk management and internal controls applicable to sustainability reporting can be found in the Corporate Governance Report, section III. Internal Control and Risk Management.

Strategy

1.3.1.8 Strategy, business model and value chain (SBM-1)

(SBM-1_01 / SBM-1_02 / SBM-1_21 / SBM-1_22 / SBM-1_23 / SBM-1_25 / SBM-1_26 / SBM-1_27 / SBM-1_28) A detailed description of NOS's strategy, business model, and value chain can be found in the Management Report, in the following sections, "1.5. Activity and Portfolio", "1.6. Our Strategy", "1.7. Our Sustainability Strategy" and "2.1. Sustainability".

(SBM-1_03 / SBM-1_04) Information on the number of salaried employees distributed by geographical areas can be found in section "1.3.3.1.7 Characteristics of the company's employees (S1-6)".

1.3.1.9 Stakeholder interests and perspectives (SBM-2)

(SBM-2_01 / SBM-2_02 / SBM-2_03 / SBM-2_04 / SBM-2_05 / SBM-2_06 / SBM-2_07 / SBM-2_012) NOS recognises the importance of continuous and structured stakeholder engagement to promote shared value creation and strengthen trust-based relationships. This commitment is reflected in the company's stakeholder engagement model, which is permanently implemented and aligned with international best practices. This model is based on four guiding principles, covering different levels of engagement, ranging from monitoring to cooperation, enabling the identification of concerns, expectations, risks, and opportunities.

Key stakeholders

The mapping and prioritisation of NOS's stakeholders is conducted in accordance with the AA 1000 SES standard, based on the criteria of influence and dependence. This process takes place before each stakeholder consultation cycle and is reflected in the company's management structure, development strategy, and operational policies. The stakeholder categories include:



B2C and B2B Customers

We place our customers at the centre of our actions and decisions, continuously striving to efficiently and effectively meet their needs.

We connect families, businesses, and the country through cutting-edge telecommunications services.

We constantly surprise our customers with relevant innovation, anticipating their needs.

Shareholders and Investors

We uphold a culture of operational excellence, discipline in asset management, and rigour in delivering results.

We honour our commitments to shareholders, maintaining a solid financial performance.

We are optimistic about the future and ambitious in the goals we set as a company.

Employees

We uphold a non-negotiable commitment to ethics, rigor, inclusion, and meritocracy at all times and in every context.

We promote a sustainable balance between personal and professional life, laying the foundation for work models adapted to the new reality and more sustainable practices.

We invest in talent retention, training, and attraction, ensuring that we have the necessary skills to meet both today's and tomorrow's challenges.

We believe in the value of diversity and are committed to strengthening our efforts toward an even more inclusive future.

Partners and Suppliers

We are fair and transparent in our relationships with all partners, striving to reach agreements that maximise value for all parties.

We expect our partners to uphold values that align with our own.

Regulatory and Government Authorities

We work closely with regulatory authorities, ensuring compliance with established guidelines.

We continuously invest in technology and sustainability, contributing to the country's development and societal well-being.

We maintain an open dialogue with key regulatory bodies, going beyond compliance to increase awareness in the telecommunications sector.

NGOs and Local Communities

The community is at the heart of our actions.

We promote social and digital inclusion through educational projects and sustainable initiatives, aiming to reduce inequality and improve the quality of life within society.

Institutions

We lead innovation and sustainability in the industry, investing in advanced technologies and ESG practices, ensuring that our operations and partnerships foster sustainable growth and competitiveness.

Media

We build strong and trustworthy relationships with the media, recognising their essential role as a source of information, knowledge dissemination, and public debate.

We maintain regular and proactive communication with the media, ensuring visibility of NOS's activities and facilitating access to relevant sector-related information.

We closely follow developments in the media sector, and through our technology, we play an active role in its digital transformation.

Purpose of our stakeholder engagement approach

We have developed a stakeholder engagement model, which we implement on a permanent basis, to enhance shared value creation and establish trust-based and responsive relationships.

The stakeholder categories that are integrated in the NOS stakeholder relationship model reflect the main influence and dependency relationships with the stakeholders, considering the characteristics of NOS' business. The model is organised into four guidelines, which cut across different levels of engagement, from monitoring to cooperation. These allow us to map the current concerns and future expectations of the stakeholders, which may substantiate new risks or opportunities, and to use them as input for informed decision-making. They also enhance the creation of shared value and the establishment of trusting and responsive relationships. It is also our purpose, within the scope of accountability towards our stakeholders, to report, with materiality and balance, and cooperate in building a more sustainable value chain, and therefore promoting shared value.

A systematic and responsive interaction allows identifying and anticipating risks and opportunities and establishing the necessary bonds of trust to enhance the creation of shared value in the long term. Implementation of the stakeholder engagement model is conducted by each of the functional areas responsible for interfacing with each category of stakeholder. The satisfaction of critical stakeholders regarding NOS, such as customers, is one of the criteria included in the performance evaluation of employees with customer interface responsibilities.



1. We stay attentive – understanding what matters most to our stakeholders

The regular and systematic engagement of our key stakeholders allows us to understand how we impact them, as well as their expectations and needs. The subsequent analyses we conduct allow us to capture an integrated view of our impacts, which we use to support business management. Stakeholder consultation is carried out by each of the functional areas. For some stakeholder categories, such as shareholders, it is centrally managed by the investor relations and sustainability department. For others, such as customers, NOS conducts ongoing consultations across different customer segments. Stakeholder consultation is conducted by different functional areas, taking into account the customer segment and the reason or purpose of the consultation, which may occur in a post-sales context or as part of a standardised consultation process. NOS uses the Net Promoter Score (NPS) as one of the key indicators to measure customer satisfaction. Additionally, there are specific customer satisfaction surveys, conducted in response to specific events in the customer journey.

NOS also conducts an employee satisfaction index. The results of these indicators are analysed in dedicated forums, involving senior management and administration. The process of analysing these results allows us to monitor progress across multiple parameters and identify opportunities for improvement in the management model and existing programmes/initiatives to enhance performance.

Topics / Stakeholder category	B2C and B2B Customers	Shareholders and Investors	Employees	Partners and Suppliers	Regulatory and Government Authorities	NGOs and Local Communities	Institutions	Media
Corporate Governance Best Practices		✓			✓			
Best Practices in Tax Matters		✓						
Cybersecurity	✓	✓	✓	✓	✓	✓	✓	
Clarity of Customer Information and Contractual Conditions	✓				✓			
Network Coverage and Quality	✓		✓	✓	✓	✓	✓	✓
Anti-Corruption Measures	✓	✓	✓	✓	✓	✓	✓	
Operational and Financial Performance		✓		✓				
Career Development and Performance Evaluation			✓	✓				
Diversity and Inclusion			✓		✓		✓	
Energy Efficiency and Renewable Energy (important for Corporate clients)	✓	✓	✓	✓		✓	✓	✓
Greenhouse Gas Emissions (important for Corporate clients)	✓	✓						✓
Innovation	✓		✓	✓		✓	✓	
Corporate Social Responsibility Policy						✓		
Anti-Competitive and Market Practices		✓			✓		✓	
Prevention of Exposure to Electromagnetic Fields	✓							
Products and Services with Social and Environmental Benefits	✓	✓	✓	✓				
Local Development Projects				✓		✓		
Projects Promoting Sustainable Consumption and Lifestyles				✓		✓		
Protection and Privacy	✓	✓			✓			
Recycling of Used Customer Equipment	✓	✓						
Remuneration and Benefits			✓					
Resolution of Issues with Contracted Products and Services	✓		✓					
Respect for Human and Workers' Rights		✓		✓		✓		
Shareholder Return		✓						

Occupational Health, Safety, and Well-being			✓	✓	✓			
Transparency and Fair Treatment	✓		✓	✓			✓	
Network Resilience and Emergency Response	✓		✓		✓	✓	✓	
Price Competitiveness	✓		✓	✓	✓	✓		✓
Products and Services for Low-Income Customers or Those with Special Needs	✓			✓	✓	✓		
Entrepreneurship Promotion				✓		✓	✓	✓
Volunteering			✓			✓		
Credibility	✓	✓	✓	✓	✓	✓	✓	✓
Legal and Regulatory Compliance		✓			✓			✓
Addressing Digital Literacy Gaps, Including Reskilling/Upskilling	✓		✓			✓		
Enhancing the Entertainment Experience	✓		✓	✓	✓	✓		
Being a Driver of Transformation for Our Customers, Increasing the Efficiency and Competitiveness of National Businesses	✓			✓	✓		✓	✓
Closeness and Engagement	✓			✓	✓	✓	✓	✓
Portuguese Company with a National Decision-Making Centre	✓		✓	✓	✓	✓	✓	✓
Preserving and Promoting National Culture	✓		✓	✓	✓	✓	✓	✓
Reskilling / Upskilling				✓			✓	

2. We integrate – how we respond to stakeholder concerns

The management decisions we make aim to align NOS with the expectations and needs of stakeholders, maximising the creation of shared value. The policies, programmes, and measures that address the positive and negative impacts associated with NOS's value chain are regularly evaluated. Following each evaluation, we seek to make the necessary adjustments to enhance their effectiveness. Among the measures implemented by NOS to address the impacts of our operations, we highlight:

Needs / Expectations	NOS Responses
▪ Cybersecurity ▪ Protection and Privacy	▪ Maintenance of ISO 27001 Certification ▪ Security & Privacy programmes, processes, and training ▪ Partnerships for new security solutions ▪ NOS Safe Net
▪ Career Development & Evaluation ▪ Occupational Health and Safety ▪ Well-being ▪ Remuneration and Benefits	▪ Maintenance of ISO 45001 Certification ▪ Compensation and benefits policy ▪ Performance and Development Model ▪ NOS Campus ▪ Health and well-being programme ▪ Occupational health and safety management and prevention plan ▪ Employee satisfaction and workplace climate study, with associated improvement plans
▪ Innovation ▪ Entrepreneurship Promotion ▪ Sustainable Consumption and Lifestyles ▪ Products and Services with Social and Environmental Benefits ▪ Climate Change ▪ Environmental impacts (GHG emissions, waste, energy efficiency, and renewable energy) ▪ Recycling of used customer equipment ▪ Prevention of exposure to electromagnetic fields ▪ Products and services for low-income customers or those with special needs ▪ Local development projects ▪ Volunteering ▪ Corporate Social Responsibility Policy	▪ Maintenance of ISO 14001 Certification ▪ Environmental objectives and targets ▪ Development of products and services addressing social and environmental challenges ▪ Electromagnetic radiation monitoring plan ▪ Investment in 5G, IoT, and Advanced Analytics technology ▪ Projects and partnerships to drive digital transformation for businesses and institutions ▪ Offers tailored to individuals with special needs ▪ Cooperation agreements with municipalities for Smart Cities ▪ Co-financed innovation projects for sustainability ▪ 5G Fund
▪ Resolution of Issues with Contracted Products and Services ▪ Network Resilience and Emergency Response ▪ Clarity of Customer Information and Contractual Conditions ▪ Network Coverage and Quality	▪ Maintenance of ISO 9001 Certification ▪ Plan to enhance network resilience and emergency response ▪ Investment plan to expand network coverage and quality ▪ Implementation of a customer self-service model for problem resolution, supported by digital process transformation ▪ Responsible communication principles ▪ Systematic content adaptation plan for customer communications
▪ Legal and Regulatory Compliance ▪ Corporate Governance Best Practices ▪ Best Practices in Tax Matters ▪ Anti-Competitive and Market Practices ▪ Prevention and Fight Against Corruption ▪ Price Competitiveness ▪ Respect for Human and Workers' Rights ▪ Diversity and Inclusion ▪ Transparency and Fair Treatment of Partners	▪ Code of Ethics and NOS's adopted policies ▪ Ethics action and training plan ▪ Risk management policy ▪ Internal audit programme ▪ Tax policy ▪ Commercial discount plan for extreme situations ▪ Commitment statement on diversity and inclusion ▪ Gender equality plan ▪ Engagement in various diversity and inclusion initiatives, such as the Women Empowerment Principles
▪ Financial Performance and Shareholder Return	▪ Strategic planning and execution ▪ Budget control ▪ Dividend distribution policy

3. We communicate – the channels we use to engage with our stakeholders

Stakeholder engagement relies on a variety of channels, selected based on the engagement objective and the target audience. In this regard, we complement the use of broad-reaching channels, such as our website, with more targeted approaches, such as roadshows for investors. Additionally, we select the most suitable tools for different levels of engagement. When the priority is informing, we use annual report publications or internal and market-focused publications. To gather feedback, we conduct employee climate surveys, customer satisfaction studies, and supplier/partner satisfaction assessments. In cases where stakeholder participation is required, engagement takes place through onboarding sessions for new employees or regulatory meetings.

The frequency of communication also depends on the objective of interaction. For this reason, we use communication channels that operate continuously or daily, such as our website, apps, or physical stores. Meanwhile, other mechanisms function on a campaign-based model, following a specific periodicity—annually or even multi-annually—such as the stakeholder consultation process used to identify priority sustainability topics.

Stakeholder consultation has taken place during the planning phase of each new strategic cycle, with the latest occurring in 2024, in preparation for the 2025 strategic cycle. In other cases, consultations may occur on demand, in response to specific needs, such as direct interactions with regulators.

While functional departments/areas are responsible for managing relationships with specific stakeholder groups—for example, Human Resources with employees or Procurement with suppliers—and do so in coordination with the Executive Committee members overseeing their respective areas, the implementation of the stakeholder engagement approach remains a company-wide responsibility. This engagement is led by the management team's commitments to stakeholders and is supported by a variety of communication and interaction mechanisms, the most relevant of which are outlined in the following diagram.



4. Moving forward together – our partnerships, alliances, and strategic external initiatives

We challenge ourselves to do better, in cooperation with other organisations. The partnerships we establish allow us to act in alliance with our stakeholders, promoting a more inclusive and sustainable society, aligned with science-based climate targets and Human Rights.

The flagship initiatives that NOS has signed, as well as the partnerships it supports or promotes, drive its strategic commitment to sustainability, in line with the spirit of SDG 17. Our commitment to sustainability is endorsed at the highest level of the organisation and is reflected in the various international and national initiatives that NOS has subscribed to over the years, under the leadership of the CEO, and to which the company remains committed. These initiatives reinforce the commitments undertaken by the management team and are based on principles and commitments for responsible and proactive action in the environmental, social, and governance domains. They are further supported and complemented by our internal policies and codes of conduct.



The initiatives and partnerships are structured into the following categories: Sustainable Society, Climate, Human Rights, Strategic Partnerships, and Cultural Support.

1. Sustainable Society

NOS has subscribed to and joined a range of initiatives that promote a more sustainable economy and society. In addition to cross-sector initiatives, which bring together companies and organisations from various economic sectors, we have also engaged in sector-specific initiatives tailored to our industry.

ZERO1

The ZERO1 Project, NOS's flagship digital empowerment initiative, was created in partnership with ENSICO with the goal of bringing free computing education to schools across the country.

MUDA

NOS is a founding member of MUDA – Movement for Active Digital Engagement, which was launched in 2017 to promote active digital citizenship among Portuguese citizens.

Membership in GRACE

NOS has joined GRACE, a business association whose mission is to promote and develop a sustainable corporate culture. Through this membership, NOS will participate in various initiatives and projects led by the association, as well as in forums and best practice exchanges on sustainability.

Subscribed Initiatives (subscription made before 2024)

- United Nations Global Compact
- "Digital With Purpose"
- BCSD Portugal Charter of Principles
- Catholic University: NOS contributed to the SDG Observatory study on Portuguese companies
- Manifesto "Leveraging the crisis to launch a new paradigm of sustainable development," promoted by BCSD Portugal
- ETIS Sustainability Working Group (circular economy in the telecommunications sector)

2. Climate

NOS's decarbonisation trajectory is aligned with the Paris Agreement's goal of limiting global temperature rise to 1.5ºC. NOS recognises the role of technology in addressing the climate emergency and has therefore joined various climate-focused initiatives.

GSMA

NOS has joined more than 10 global operators in an initiative to reuse and recycle five billion unused mobile phones, in collaboration with GSMA, the global representative of the mobile industry.

European Green Digital Coalition (EGDC)

NOS was the only Portuguese company to commit to actively participating in Europe's digital transformation over the next decade. This commitment was made within the framework of the European Commission and Portuguese Presidency's initiative #DigitalDay2021. By signing the European Green Digital Coalition (EGDC) declaration, NOS has committed to implementing actions that reduce greenhouse gas emissions at a pace aligned with the 1.5°C global warming limit, aiming to achieve net-zero carbon neutrality by 2040.

Subscribed Initiatives (prior to 2024)

- Manifesto "Towards COP27"
- Porto Climate Pact
- Commitment Charter "Business Ambition for 1.5°C"
- Lisbon European Green Capital 2020
- European Green Digital Coalition



3. Human Rights – Diversity

The initiatives NOS has subscribed to in the area of Human Rights, particularly regarding equality and diversity, represent important milestones in strengthening the company's maturity in managing these topics.

Subscribed Initiatives / Memberships (prior to 2024)

- Women's Empowerment Principles (WEPs)
- Portuguese Women in Tech
- CEO Guide on Human Rights
- UN Target Gender Equality
- Portuguese Charter for Diversity
- Technovation Girls Portugal
- PWN (Professional Women's Network)
- Girls in ICT
- Launch of a Human Rights Policy

4. Strategic partnerships

NOS is a member of several associations where its presence holds strategic value, either due to the association's role in NOS's business areas or, in the case of cross-sector associations, due to the value they bring to NOS, Portuguese society, or the national economy. Beyond these strategic partnerships, where NOS actively participates in the governance bodies of the respective organisations, our business model also incorporates a range of technical partnerships that support business development. These technical partnerships are detailed in this report in the sections "Value for Customers and a More Advanced Society" and "We Create Value for Our Business Partners".

- COTEC Portugal – Business Association for Innovation
- APRITEL – Portuguese Association of Electronic Communications Operators
- AEM – Portuguese Association of Listed Companies
- APDC – Portuguese Association for the Development of Communications
- IPCG – Portuguese Institute of Corporate Governance
- Porto Business School

5. Cultural support

Entertainment is one of the pillars of NOS's business. Given its importance to Portuguese society, NOS plays an active role in the cultural landscape, not only promoting cinema but also other art forms, including theatre, opera, and dance.

As a company operating in the entertainment sector, NOS has consistently invested in cultural support, as detailed in the corporate social responsibility initiatives section of this report.

In this context, NOS is also an associate member of key cultural institutions, actively participating in their governance bodies and contributing to the development of the sector.

Additionally, NOS actively supports the Portuguese Film Academy, reinforcing its commitment to promoting and enhancing the national audiovisual sector.

NOS Alive is another cornerstone of our cultural support, serving as a flagship event that contributes to the development of the music sector and helps position Portugal internationally as a cultural destination.

Cultural Associations in which NOS holds membership and governance roles

- Quinta da Regaleira
- Fundação CulturSintra
- Fundação Serralves
- FEVIP – Portuguese Association for the Protection of Audiovisual Works
- APEC – Portuguese Association of Cinematographic Companies



1.3.1.10 Impacts, Risks, and Opportunities (SBM-3)

(SBM-3 | CODE: SBM-3_02 | CODE: SBM-3_03 | CODE: SBM-3_04 | CODE: SBM-3_05 | CODE: SBM-3_06 | CODE: SBM-3_07 | CODE: SBM-3_08 | CODE: SBM-3_10 | CODE: SBM-3_11 | CODE: SBM-3_12)

Material sustainability topics

As part of the preparation for its new strategic cycle, NOS conducted a broad reflection process aimed at identifying the most relevant sustainability topics for its operations. This process considered our business positioning and vision, the key sustainability drivers, the ESG impacts associated with our operations, and the expectations of our stakeholders.

The 2025-2030 Sustainability Strategy was developed based on the results of the stakeholder consultation with internal and external stakeholders, conducted in 2024, and an analysis of contextual factors such as regulatory challenges, market dynamics, investor expectations, compliance requirements, and the commitments made by the organisation. This process allowed us to identify four guiding pillars of our approach and 33 material IROs, which reflect the key impacts, risks, and opportunities of our business across ethical, environmental, and social dimensions.

The Sustainability Strategy is aligned with the Sustainable Development Goals (SDGs), highlighting those that are most interconnected with our business and where we can generate or influence a more significant impact. The approach adopted ensures the integration of ESG considerations into our decision-making process and strengthens our capacity to create sustainable value for both the business and our stakeholders.

Double Materiality Matrix

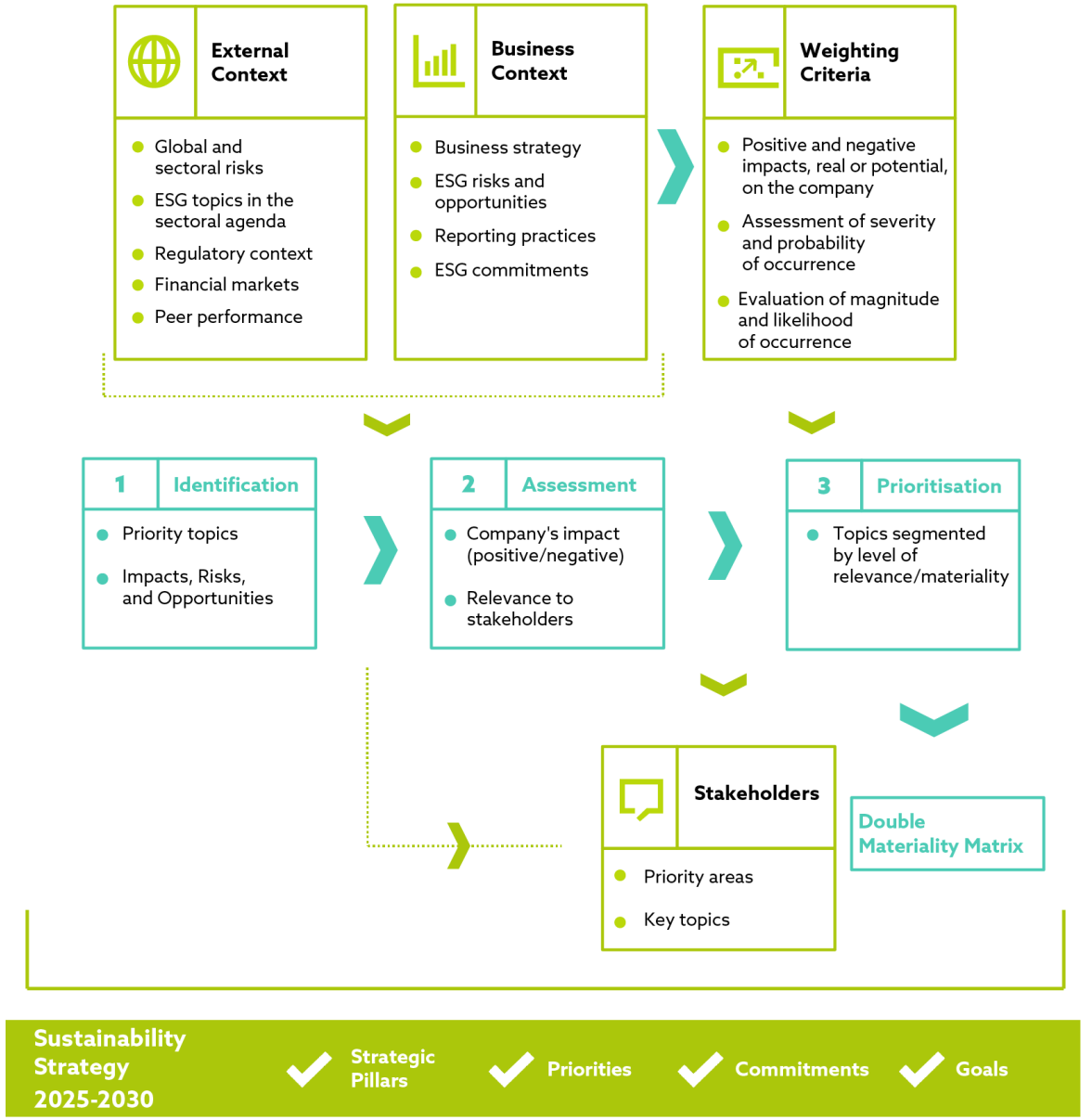
Topic	Sub-topic	Classification	Value Chain
E1 - Climate Change	Climate change mitigation	Positive impact	Own operations
		Negative impact	Own operations
	Climate change adaptation	Risk	Own operations
	Energy	Negative impact	Own operations
		Negative impact	Upstream
		Positive impact	Own operations
		Positive impact	Downstream
		Risk	Upstream
		Risk	Own operations
E5 - Resource Use and Circular Economy	Resource inputs, including resource usage	Positive impact	Own operations
		Negative impact	Downstream
		Positive impact	Downstream
	Waste	Negative impact	Upstream
		Negative impact	Downstream
	Resource outputs related to products and services	Opportunity	Own operations
		Risk	Own operations
S1 - Own Workforce	Working conditions	Negative impact	Own operations
		Opportunity	Own operations
	Equal treatment and opportunities for all	Opportunity	Own operations
		Positive impact	Upstream
S3 - Affected Communities	Economic, social, and cultural rights of communities	Positive impact	Own operations
S4 - Consumers and End Users	Impacts related to consumer and/or end-user information	Negative impact	Downstream
		Positive impact	Downstream
		Risk	Downstream
		Opportunity	Own operations
		Opportunity	Downstream
G1 - Business Conduct	Corporate culture	Opportunity	Own operations
	Supplier relationship management, including payment practices	Opportunity	Upstream
		Risk	Upstream

Management of impacts, risks, and opportunities

1.3.1.11 Double materiality analysis process (IRO-1)

Double materiality analysis process and sustainability strategy

At the beginning of each strategic cycle, and as part of its preparation, we conduct a broad reflection process aimed at identifying the most relevant sustainability topics within the context of our business. This analysis considers our positioning and business vision, key sustainability drivers, and the priorities of our stakeholders. Based on the findings of this double materiality analysis, we proceed to define a new strategic positioning, identifying priority action pillars and corresponding commitments. At the same time, we establish the key topics that will be the main focus of our sustainability reporting throughout the cycle. During 2024, this process was conducted to prepare the current 2025-2030 strategic cycle.



(IRO-1_01) The impacts, risks, and opportunities related to NOS's operations were identified across all departments and countries where NOS operates. The Double Materiality Analysis incorporated the entire upstream and downstream value chain. To ensure a comprehensive assessment of potential impacts, risks, and opportunities, NOS defined and characterised all activities included in its value chain.

NOS's value chain was grouped into three categories: upstream value chain, own operations, and downstream value chain. For each category, the main business activities, geographies, and stakeholders involved were determined. This analysis served as a basis for identifying potential impacts, risks, and opportunities and provided guidance on which stakeholders should be engaged in the Double Materiality Analysis process. In the identification and evaluation of impacts, risks, and opportunities, their position within the value chain was classified as follows:

- Upstream value chain: Includes suppliers, service providers, strategic partners, network infrastructure, technology, and logistics, which contribute to the supply of essential goods and services for NOS's operations.
- Own operations: Covers telecommunications infrastructure, data centres, network operation and maintenance, NOS offices and stores, as well as the activities, products, and services directly managed by the company.
- Downstream value chain: Refers to the distribution and use of NOS services, including individual and corporate customers, commercial partners, and the broader community, as well as customer support and the social and environmental impacts of the services provided.

NOS conducted an external stakeholder consultation to identify potential material topics. The process involved employees, suppliers and partners, customers, media, and the community, allowing the incorporation of diverse perspectives in defining the company's strategic priorities.

Methodology – Impact materiality assessment

The impact assessment followed a structured approach, considering the nature, origin, and time horizon of the identified impacts. Impacts were classified as positive or negative, real or potential.

- Real impacts: Those that have already occurred or currently exist.
- Potential impacts: Those that may occur in the future.

Additionally, impacts were categorised according to their relationship with NOS:

- Directly caused by NOS's operations, products, or services.
- Resulting from NOS's contribution, but not exclusively caused by its operations, products, or services, occurring in conjunction with third parties.
- Linked to NOS's operations, products, and services through business relationships.

Real impacts were assessed based on severity, while potential impacts were analysed considering severity and likelihood. Severity was defined as the sum of three factors: scale, scope, and irremediability. The assessment was conducted separately for positive and negative impacts, ensuring they were not offset against each other.

The time horizon for impacts was classified into three categories:

- Short-term (<1 year)
- Medium-term (1-5 years)
- Long-term (>5 years)

Methodology – Financial materiality assessment

The analysis of financial risks and opportunities was conducted based on magnitude and likelihood of occurrence. Magnitude was defined by the potential impact on revenues and costs.

As with the impact assessment, financial risks and opportunities were analysed across three-time horizons:

- Short-term (<1 year)
- Medium-term (1-5 years)
- Long-term (>5 years)

This framework ensures a comprehensive and integrated view of materiality, enabling NOS to anticipate challenges and align its sustainability strategy with long-term value creation.

IRO-1_02

Preparation of the Double Materiality Analysis

In the initial phase, NOS defined the scope of activities to be included in the Double Materiality Analysis (DMA), covering both its direct operations and its value chain. Based on this framework and the identified stakeholders, internal Subject Matter Experts (SMEs) were selected to participate in the process. The selection of SMEs considered their experience in different areas of sustainability, as well as their involvement in risk management and NOS's financial and sustainability reporting.

Identification of Impacts, Risks, and Opportunities

The identification of impacts, risks, and opportunities (IROs) was based on NOS's business model and sector, following the guidelines set by the ESRS. To build the list of potential IROs, NOS relied on the following elements:

- Priority topics identified in the previous Materiality Analysis;
- Sector benchmark analysis;
- External stakeholder consultation;
- Internal expertise of SMEs.

Materiality Assessment and Validation

The identified impacts, risks, and opportunities underwent a qualitative and quantitative assessment by SMEs, considering the scales and quantitative thresholds defined by NOS. This analysis was based on internally established criteria, ensuring the coherence and robustness of the process.

After consolidated validation by the SMEs and the project team, the results were approved by the Executive Committee.

IRO-1_03 / IRO-1_04 / IRO-1_05 / IRO-1_06

Impact Materiality

As part of the identification and assessment of impacts, risks, and opportunities (IROs), NOS analysed all impacts associated with its business activities and value chain, categorising them based on their position within the chain: upstream value chain, own operations, and downstream value chain.

To ensure a comprehensive and representative assessment, the process was supported by the expertise of Subject Matter Experts (SMEs) and the insights gathered from external stakeholder engagement, ensuring that various perspectives were incorporated into the definition and evaluation of impacts.

In compliance with ESRS standards, quantitative scales were defined for assessing the materiality of impacts, risks, and opportunities.

- Impacts were assessed on a scale of 1 to 5, considering the scale, scope, remediability, and probability of occurrence.

The quantitative results of the impact assessment were determined by summing the scale, scope, and remediability scores, multiplied by the quantitative probability factor. The final value was then compared with the established materiality threshold, ensuring that the material impacts were consistent with NOS's strategy.

This framework ensures that the assessment aligns with NOS's strategy and enables a consistent and comparable analysis of impacts across the value chain.

Additionally, all negative impacts were assessed from a human rights perspective. To prioritise the severity of these impacts, particularly concerning NOS's workforce, supply chain workers, affected communities, and consumers, the probability of potential negative impacts was automatically set to 1.

(IRO-1_07 / IRO-1_08 / IRO-1_09 / IRO-1_10)

Financial Materiality

As part of the identification and assessment of impacts, risks, and opportunities (IROs), NOS analysed the financial risks and opportunities associated with its business activities and value chain, categorising them based on their position within the value chain.

Furthermore, when reviewing identified material risks and opportunities, NOS considered interdependencies between impacts, risks, and opportunities, ensuring an integrated approach aligned with best risk management practices.

For evaluation, quantitative scales were defined:

- Risks and opportunities were assessed on a scale of 1 to 5, based on magnitude and probability of occurrence.

The quantitative results were determined by multiplying the magnitude score by the probability factor, then compared against a predefined materiality threshold, ensuring that identified risks and opportunities were aligned with NOS's strategy.

This framework ensures that the assessment aligns with NOS's strategic direction and enables a consistent and comparable analysis of impacts across the value chain.

In the evaluation of risks and opportunities, comparability was ensured with the non-financial risk assessment methodology already used by NOS's risk management team. Thus, the financial values for magnitude, scale, and probability follow NOS's internal financial risk assessment criteria, ensuring consistency and integration with the company's broader risk analysis frameworks.

IRO-1_11 / IRO-1_12 / IRO-1_13

To guarantee that NOS's Double Materiality Analysis results were robust and well-founded, Subject Matter Experts (SMEs) were involved throughout the identification and evaluation of impacts, risks, and opportunities (IROs). SMEs were selected based on their expertise in specific sustainability areas, ensuring a technical and multidisciplinary approach.

Additionally, NOS's Risk and Compliance team, responsible for its corporate risk management methodology (Enterprise Risk Management), played a key role in defining the methodological approach, particularly in the structuring of financial materiality scales and thresholds. This ensured alignment with NOS's internal risk analysis frameworks. The Risk and Compliance team also actively participated in the evaluation and validation of risks and opportunities, reinforcing coherence and integration of the process with NOS's global strategy.

IRO-1_14 / IRO-1_15

Beyond external stakeholder consultations and sector benchmarking, SMEs provided both qualitative and quantitative data to support the exercise, ensuring a comprehensive assessment based on tangible insights. Simultaneously, the risk management team contributed expertise on potential risks and opportunities, ensuring that the evaluation process remained methodologically consistent with NOS's internal criteria.

NOS has been monitoring sustainability topics for several years, conducting a Materiality Analysis in 2020 to identify priority topics. However, this was the first Double Materiality Analysis conducted in compliance with ESRS standards, making it incomparable with previous reporting cycles.

Materiality of ESRS E2, E3, and E4

As a result of the Double Materiality Analysis, NOS concluded that the topics covered by ESRS E2 (Pollution), ESRS E3 (Water and Marine Resources), and ESRS E4 (Biodiversity and Ecosystems) are not material to the company.

ESRS E2 - Pollution

NOS's business does not involve industrial processes or significant emissions of pollutants into the air, water, or soil. The environmental impact of its operations primarily results from energy consumption and direct and indirect greenhouse gas (GHG) emissions, as well as the use and end-of-life disposal of electrical and electronic equipment. These topics are already covered in ESRS E1 (Climate Change) and ESRS E5 (Resource Use and Circular Economy).

While pollution is not considered a material topic, NOS has implemented mitigation measures for its key impacts, including:

- Reducing its operational carbon footprint through energy efficiency measures in its facilities, progressive electrification of its fleet, and increasing renewable energy consumption.
- Responsible management of electrical and electronic waste, ensuring that decommissioned equipment is either recycled or reintegrated into the value chain.

ESRS E3 - Water and Marine Resources

NOS does not operate in sectors with high water consumption and has no activities directly impacting marine resources. All water consumed comes from municipal supply systems, with no self-extraction or use of natural water sources. All wastewater is discharged into municipal sanitation systems, with no direct discharges into the environment.

While water is not considered a material topic, NOS implements practices to monitor and optimise water use across its facilities, technical infrastructure, retail stores, and cinemas. These measures include:

- Rainwater harvesting system at the Parque das Nações building, used for irrigation and fire suppression;
- Installation of timed faucets and flow restrictors in retail stores;
- Replacement of chillers with more efficient air conditioning systems, reducing both energy and water consumption.

ESRS E4 - Biodiversity and Ecosystems

The presence of telecommunications infrastructure can impact landscapes and biodiversity, particularly in non-urban areas and high conservation value sites. However, NOS implements planning and operational measures to prevent or minimise these effects, ensuring that biodiversity is not a material topic.

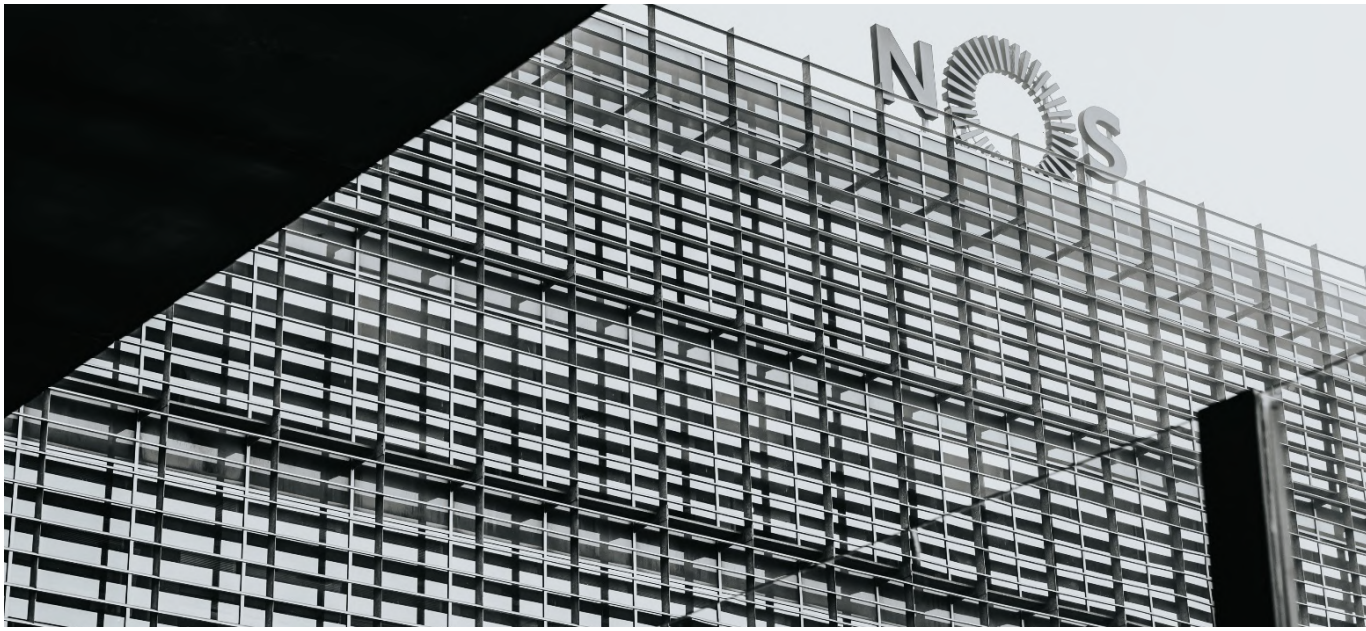
Among the initiatives adopted to reduce the environmental impact of infrastructures, the following stand out:

- Sharing mobile access networks in rural areas, reducing the need for new infrastructure and minimising visual and territorial impact;
- Visual integration of infrastructure, using disguised solutions in urban areas and colour-adapted options in rural locations;
- Compliance with environmental guidelines from the Portuguese Institute for Nature Conservation and Forests (ICNF), applying additional protection measures in sensitive areas.

Since 2021, NOS has supported a reforestation project in wildfire-affected areas in the municipalities of Fundão, Mangualde, Meda, and Pampilhosa da Serra. In 2024, reforestation efforts were expanded, focusing on watercourse restoration and biodiversity-rich woodland creation. This project contributes to carbon sequestration, biodiversity protection, and wildfire resilience. The CO_2 removed from the atmosphere is monitored, enabling NOS to voluntarily offset its unavoidable Scope 1 carbon emissions, primarily from its own vehicle fleet, until full electrification is achieved.

Materiality of ESRS E1, E5, and G1

Detailed information on the double materiality analysis process (IRO-1) for E1, E5, and G1 can be found in sections "1.3.2.1.2 Material impacts, risks and opportunities and their interaction with the strategy and business model (ESRS 2 SBM-3/IRO-1)", "1.3.2.2.1 Management of impacts, risks and opportunities (IRO-1)" and "1.3.4.1.1 Management of impacts, risks and opportunities (IRO-1)".



1.3.1.12 Policies (MDR-P)

Policy	Description	Location of activities	Geography	Affected stakeholders	Responsible for implementation	Stakeholders involved in definition	Stakeholders involved in definition	Stakeholders involved in definition
NOS Sustainability Policy	Corporate policy that outlines NOS's commitment to creating shared value and promoting responsible practices across all business dimensions. It defines the company's operating principles, structured around four strategic pillars: In the Name of the Planet; For a More Connected Society; More for Our People; and Responsible Leadership. In the environmental pillar, the policy commits the company to adopting best practices for environmental protection, including pollution prevention, and identifies climate change mitigation and adaptation, as well as business circularity, as material themes.	Upstream; Own operations; Downstream	All geographies where NOS operates. [For suppliers and partners, it applies regardless of the geography where they operate]	Employees (including board members, executives, and workers); Suppliers and Partners; Customers; Shareholders and Investors; Governmental Entities and Regulators; Third Sector Organisations	Executive Committee	Investor Relations & Sustainability Department; Audit, Risk & Compliance Department. Employees (including board members, executives, and workers); Suppliers and Partners; Customers (corporate and residential); Investors; [Stakeholders covered by the stakeholder consultation process that supported the definition of NOS's sustainability strategy].	- United Nations Global Compact - ISO 9001, ISO 14001, and ISO 45001 Standards	- Corporate Website; - Intranet;
Sustainability Requirements for NOS Suppliers and Partners	Corporate policy document that reflects the company's commitment to responsible practices throughout its entire value chain. It establishes a set of sustainability requirements that must be met by all NOS Suppliers and Partners. These requirements cover environmental, social, and governance (ESG) criteria (e.g., Quality, Environment, Occupational Health and Safety, Information Security, IT Service Management, etc.), encouraging the adoption of measures to reduce environmental impacts, promote fair working conditions, and ensure ethical and compliance-driven practices. Additionally, all NOS Suppliers and Partners are required to comply with applicable legal requirements related to their activities; adopt best sustainability practices; act in accordance with NOS's Code of Ethics; collaborate in improving the environmental and social performance of NOS products and services; participate in NOS supplier evaluation processes; and provide information on their environmental and social objectives and performance. In the environmental pillar, the document identifies energy and emissions, as well as waste, as key focus areas.	Upstream	All geographies where NOS operates.	Suppliers and Partners	Executive Committee	Executive Committee; Audit, Risk & Compliance Department	- Universal Declaration of Human Rights - United Nations Convention Against Corruption - International Convention on the Rights of the Child - International Labour Organisation (ILO) Conventions - United Nations 2030 Agenda for Sustainable Development - Paris Agreement - United Nations Global Compact	- Integral part of all supply contracts. - Corporate Website; - Intranet
Risk Management Policy	The Risk Management Policy is part of NOS's Corporate Governance instruments. It aims to define the risk management system, including methodologies, key processes related to risk management and monitoring, involved entities, and their responsibilities.	Upstream; Own operations; Downstream	All geographies where NOS operates.	Employees; Suppliers and Partners; Customers	Executive Committee (under the delegated authority of the Board of Directors)	Executive Committee; Audit, Risk & Compliance Department	- Portuguese Institute of Corporate Governance (IPCG) Corporate Governance Code	- Corporate Website; - Intranet

Policy	Description	Location of activities	Geography	Affected stakeholders	Responsible for implementation	Stakeholders involved in definition	Stakeholders involved in definition	Stakeholders involved in definition
General Information Security Policy	The Information Security Policy establishes the Information Security Principles to be followed by Employees and Suppliers & Partners, as well as the levels and security domains, including their control objectives.	Upstream; Own operations; Downstream	All geographies where NOS operates.	Employees; Suppliers and Partners	Executive Committee	Executive Committee; Chief Information Security Officer (CISO); Audit, Risk & Compliance Department	- ISO 27001:2013 Information Security Management System; - Regulation on the Security and Integrity of Electronic Communications Networks and Services (ANACOM Regulation No. 303/2019)	- Corporate Website; - Intranet
Tax Policy	NOS Group's Tax Policy consolidates its tax strategy and commitment to tax regulations and the application of best tax practices, fostering collaboration and cooperation with Tax Authorities. The tax strategy aims to ensure compliance with applicable tax legislation and standards, adequately coordinate tax practices across Group entities, considering corporate interest and ensuring the achievement of long-term objectives, avoiding tax risks and inefficiencies in decision-making, thereby maximising value creation for shareholders.	Upstream; Own operations; Downstream	All geographies where NOS operates.	Employees; Suppliers and Partners; Customers; Shareholders and Investors; Governmental Entities and Regulators	Executive Committee (under the delegated authority of the Board of Directors)	Financial & Assurance Services Department	- Applicable tax legislation and standards.	- Corporate Website; - Intranet
Human Rights Policy	The Human Rights Policy reaffirms NOS's commitment to safeguarding human and labour rights, respecting existing national and international principles, standards, and legislation. It reinforces commitments, guidelines, and requirements already established in NOS's Code of Ethics and other corporate codes, policies, and instruments.	Upstream; Own Operations; Downstream	All geographies where NOS operates.	Employees; Suppliers and Partners; Customers	Executive Committee (acting under delegated authority from the Board of Directors)	Investor Relations & Sustainability Department; People & Organisation Department; Legal Department; Internal Audit, Risk, and Compliance Department	- International Bill of Human Rights - Universal Declaration of Human Rights - International Covenant on Civil and Political Rights - International Covenant on Economic, Social, and Cultural Rights - International Labour Organization (ILO) Declaration - UN Global Compact Principles - OECD Guidelines for Multinational Enterprises - UN Guiding Principles on Business and Human Rights - WBCSD CEO Guide to Human Rights - UN Human Rights Council - Portuguese Charter of Human Rights in the Digital Age	- Corporate Website; - Intranet
Gender Equality Plan	The Gender Equality Plan defines NOS' commitment and goal towards equal treatment and opportunities for all its people, promoting the elimination of any form of discrimination based on gender.	Own operations	All geographies where NOS operates.	Employees; Suppliers and Partners.	Executive Committee (CHRO)	Executive Committee; People & Organisation Department; People Relations & Diversity Department (Diversity & Inclusion area).	- United Nations Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), 1979; - Universal Declaration of Human Rights, 1948; - Charter of Fundamental Rights of the European Union; - Treaty on European Union; -	- CMVM Website; - Institutional Website; - Intranet

Policy	Description	Location of activities	Geography	Affected stakeholders	Responsible for implementation	Stakeholders involved in definition	Stakeholders involved in definition	Stakeholders involved in definition
							Treaty on the Functioning of the European Union, Article 19, referring to the fight against gender discrimination; - European Pact for Gender Equality (2011-2020), adopted on 7 March 2011; - European Employment Strategy; Europe 2020 Growth Strategy, adopted on 17 June 2010; - Women's Charter, adopted on 5 March 2010; - Fundamental Rights and Duties enshrined in the Portuguese Constitution (notably Article 13), further detailed through instruments such as the Labour Code (Equal Treatment and Non-Discrimination and Parental Leave subsections), Ministerial Order No. 84/2015 of 20 March, and the Fifth National Plan for Gender Equality, 31 December.	
Code of Ethics	The Code of Ethics sets out the principles and rules governing the internal and external relationships of NOS Group companies with their stakeholders, including fair competition rules. The Code applies to all corporate body members and employees of the Group, as well as all those representing or providing services to NOS Group on a permanent or temporary basis. It aims to share a set of principles and rules that should govern the internal and external relationships of NOS Group companies with their stakeholders. It must be followed by all NOS corporate body members and employees, as well as those representing or providing services to the NOS Group.	Upstream; Own operations; Downstream	All geographies where NOS operates.	Employees; Suppliers and Partners; Clients	Ethics Committee (delegated by the Corporate Governance and Sustainability Committee)	Corporate Governance and Sustainability Committee; Ethics Committee; People & Organisation Department; Audit, Risk & Compliance Department; Legal Department.	- Portuguese Institute of Corporate Governance (IPCG) Corporate Governance Code	- Institutional Website; - Intranet
Code of Ethics – Summary Version for Partners and Suppliers	Recognising that our activities have environmental and social impacts, we consider it essential that our suppliers and partners comply with applicable legislation and internalise and act in accordance with the principles outlined in our Code of Ethics. To this end, we have created a summarised version of the Code for Partners and Suppliers. This summary aims to promote the understanding and adoption of the principles and rules described in the Code of Ethics by suppliers and partners. Since 2016, NOS has made this summary version	Upstream	All geographies where NOS operates.	Employees; Suppliers and Partners.	Ethics Committee (delegated by the Corporate Governance and Sustainability Committee)	Corporate Governance and Sustainability Committee; Ethics Committee; People & Organisation Department; Audit, Risk & Compliance Department; Legal Department.	Aligned with NOS Code of Ethics	- Institutional Website; - Intranet

Policy	Description	Location of activities	Geography	Affected stakeholders	Responsible for implementation	Stakeholders involved in definition	Stakeholders involved in definition	Stakeholders involved in definition
	available to these stakeholders, who must ensure its strict compliance.							
Code of Conduct for the Prevention and Combat of Workplace Harassment	The Code of Conduct for the Prevention and Combat of Workplace Harassment comprises principles and rules aimed at preventing and, where necessary, combating harassment behaviours or any other form of attacks on the dignity of employees or the people they interact with.	Upstream; Own operations; Downstream	All geographies where NOS operates.	Employees; Suppliers and Partners; Clients	Ethics Committee (delegated by the Corporate Governance and Sustainability Committee)	Corporate Governance and Sustainability Committee; Ethics Committee; People & Organisation Department; Audit, Risk & Compliance Department; Legal Department.	Aligned with NOS Code of Ethics	- Institutional Website; - Intranet
Code of Conduct for the Prevention of Corruption and Related Offences	This policy arises from a legal obligation and aims to establish a set of principles, values, and rules applicable across all NOS activities, including regulations on receiving and offering undue advantages, as well as domains such as corruption, influence peddling, and financial crimes, including money laundering or fraud in obtaining or diverting subsidies, grants, or credit. It must be read alongside other existing policies in the company, particularly the Code of Ethics and the Whistleblowing Regulations. It incorporates rules for accepting and offering benefits. It designates the RCN – Regulatory Compliance Officer or CCO – Chief Compliance Officer, Filipa Santos Carvalho, as responsible for the adoption and implementation of this Code and related compliance programmes. It applies to all corporate body members, executives, and NOS employees, as well as, with necessary adaptations, all NOS representatives, Partners, and any entity or individual providing services to NOS on a permanent or temporary basis.	Upstream; Own operations; Downstream	All geographies where NOS operates.	Employees; Suppliers and Partners; Clients	Executive Committee (acting under delegated powers from the Board of Directors)	Corporate Governance and Sustainability Committee; RCN – Regulatory Compliance Officer; Audit, Risk & Compliance Department; Legal Department.	RGPC – General Regime for Corruption Prevention (DL 109-E/2021)	- Institutional Website; - Intranet
Prevention Plan for Risks of Corruption and Related Offenses	This plan results from a legal obligation and must be interpreted alongside other policies in force at NOS, particularly the Code of Conduct for the Prevention of Corruption and Related Offences. It enables NOS to identify potential corruption and related offence risks (RCIC), establish preventive and corrective measures to reduce their likelihood and impact, define monitoring and evaluation mechanisms for the plan's effectiveness, and create a deterrent environment against any corrupt practices within NOS.	Upstream; Own operations; Downstream	All geographies where NOS operates.	Employees; Suppliers and Partners; Clients	RCN – Regulatory Compliance Officer (CCO – Chief Compliance Officer)	RCN – Regulatory Compliance Officer; Audit, Risk & Compliance Department; Legal Department.	RGPC – General Regime for Corruption Prevention (DL 109-E/2021)	- Institutional Website; - Intranet
Whistleblowing Regulation	The Whistleblowing Regulation aims to establish a set of internal rules and procedures for receiving, recording, and handling reports of suspected irregularities received by the company, in compliance with the applicable legal and regulatory provisions, as well as the rules, principles, and values enshrined in the NOS Code of Ethics.	Upstream; Own Operations; Downstream	All geographies where NOS operates.	Employees; Suppliers and Partners; Customers	Compliance Officer (CCO - Chief Compliance Officer)	Corporate Governance and Sustainability Committee; Compliance Officer; Risk and Compliance Audit Department; Legal Department.	General Regime for the Protection of Whistleblowers (Law 93/2021)	- Website; - Intranet

Policy	Description	Location of activities	Geography	Affected stakeholders	Responsible for implementation	Stakeholders involved in definition	Stakeholders involved in definition	Stakeholders involved in definition
Diversity and Inclusion Commitment Statement	The Diversity and Inclusion Commitment Statement materialises one of the strategic pillars of NOS's Sustainability Policy, where the principle of valuing our people is enshrined. The statement contains a set of principles that should guide the behaviours, attitudes, and decisions of all governing bodies and employees of the NOS Group companies, reinforcing NOS's reputation among its stakeholders, whether employees, customers, or others.	Upstream; Own Operations; Downstream	All geographies where NOS operates.	Employees	Executive Committee (CHRO)	Executive Committee; People & Organisation Department; People Relations & Diversity Department (Diversity and Inclusion area).	- Compliance with National Legislation on the subject; - Portuguese Charter for Diversity; - EU Charter of Fundamental Rights	- Institutional Website; - Intranet
Procurement Manual	The Procurement Manual comprises the stages and principles applied in the acquisition processes of products and services. Recognising that our activity generates environmental and social impacts, including health and safety at work, we consider it essential that our suppliers and partners comply with the legislation applicable to their activity and internalise and act in accordance with the principles set out in our Code of Ethics.	Upstream	All geographies where NOS operates.	Employees; Suppliers and Partners	Executive Committee	Executive Committee; Procurement & Supply Chain Department.		- Intranet
Customer Privacy Policy	The NOS Customer Privacy Policy aims to enable employees, partners, suppliers, and customers to understand how our organisation collects, processes, and protects the personal information provided by all those who use NOS services.	Upstream; Own Operations; Downstream	All geographies where NOS operates.	Employees; Suppliers and Partners; Customers	Executive Committee	Executive Committee; DPO - Data Protection Officer; Legal Department; Risk and Compliance Audit Department	GDPR - General Data Protection Regulation (EU Regulation 2016/679)	- Institutional Website; - Intranet
Privacy and Personal Data Protection Commitment Statement	The Privacy and Personal Data Protection Commitment Statement details NOS's commitment to privacy, security, and data protection, ensuring that all individuals who process personal data in their relationship with NOS subscribe to and act in accordance with the principles underlying this commitment.	Upstream; Own Operations; Downstream	All geographies where NOS operates.	Employees; Suppliers and Partners; Customers	Executive Committee	Executive Committee; DPO - Data Protection Officer; Legal Department; Risk and Compliance Audit Department	GDPR - General Data Protection Regulation (EU Regulation 2016/679)	- Institutional Website; - Intranet
Responsible Online Presence Guide	Believing that our people can actively contribute to NOS's reputation in the digital world, we have developed the "Responsible Online Presence Guide" to support and guide expected conduct when acting in a professional context or representing NOS. The document also clarifies what our people can and cannot publish on social media involving the NOS brand, always respecting freedom of expression and individual privacy. This guide, as an integral part of the NOS Code of Ethics, complements the principles and rules established therein.	Upstream; Own Operations; Downstream	All geographies where NOS operates.	Employees; Suppliers and Partners; Customers	Ethics Committee (by delegation of the Corporate Governance and Sustainability Committee)	Ethics Committee; People & Organisation Department; Corporate Communication Department; Brand & Communication Department.	Aligned with the NOS Code of Ethics	- Intranet

Policy	Description	Location of activities	Geography	Affected stakeholders	Responsible for implementation	Stakeholders involved in definition	Stakeholders involved in definition	Stakeholders involved in definition
Responsible Online Presence Guide – Version for Partners and Suppliers	Similar to the "Code of Ethics - Summary Version for Partners and Suppliers," we have also created the "Responsible Online Presence Guide - Version for Partners and Suppliers." When using social media to talk about NOS, our partners and suppliers are also influencing how others perceive the company. Recognising the importance of social media—as a tool for disseminating NOS products and services and for attracting and retaining customers—we have developed a set of guidelines to help understand how our partners and suppliers should act and, above all, what their employees can and cannot post involving the NOS brand.	Upstream	All geographies where NOS operates.	Suppliers and Partners	Ethics Committee (by delegation of the Corporate Governance and Sustainability Committee)	Ethics Committee; People & Organisation Department; Corporate Communication Department; Brand & Communication Department.	Aligned with the NOS Code of Ethics	- Intranet

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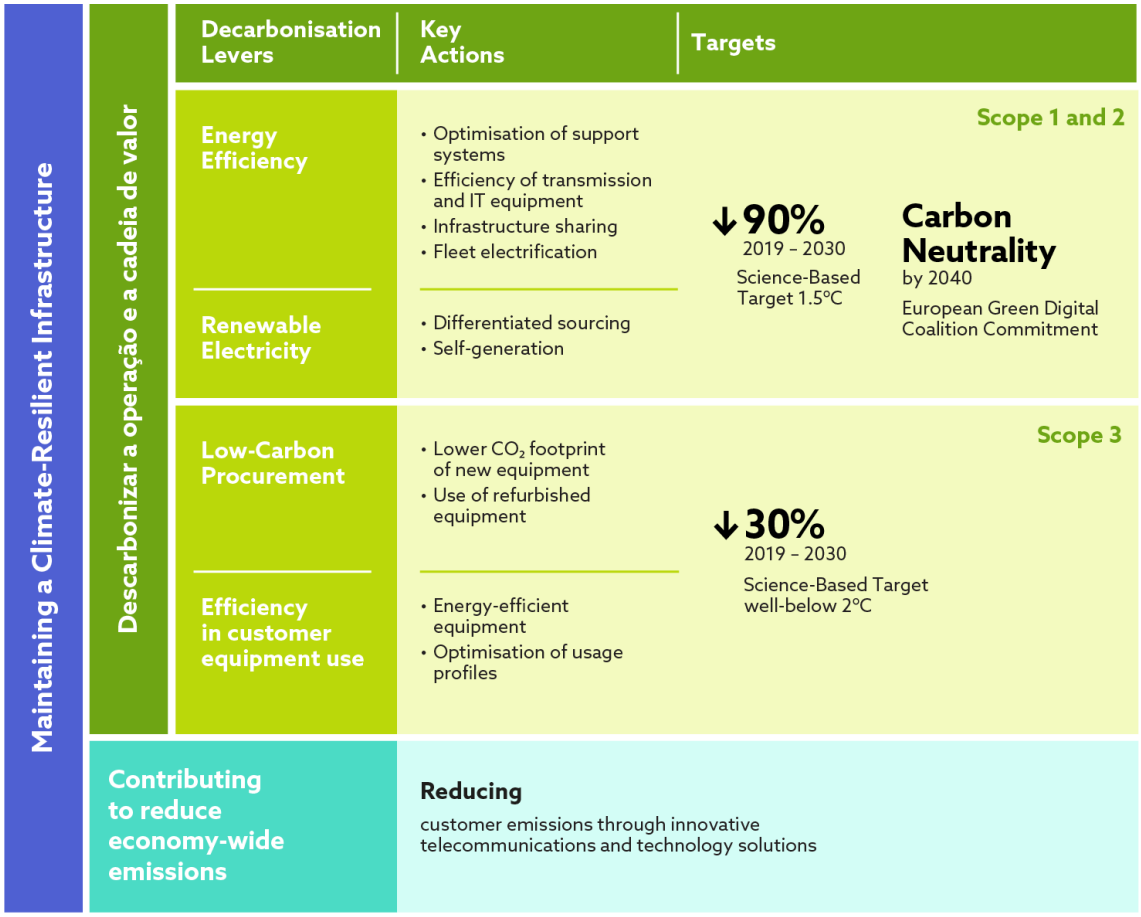
1.3.2.1 ESRS E1 – Climate Change

Strategy

1.3.2.1.1 Transition plan for climate change mitigation (E1-1)

Approach to climate transition

(E1-1_01/E1-1_02/E1-1_13) NOS's climate transition strategy is based on two key commitments: (i) increasing the energy and carbon efficiency of its operations and value chain; and (ii) contributing to the decarbonisation of the economy through innovative products and services that reduce customer emissions. These commitments are supported by continuous investment in the technological modernisation of our technical infrastructure and the enhancement of its resilience to the physical risks of climate change.



NOS's climate commitments are formally integrated into NOS 2025-2030 business strategy and into its Sustainability-Linked Financing Framework, which governs our issuance of sustainable financing instruments.

The climate transition strategy is aligned with NOS's financial and strategic planning, both influencing and being influenced by technological advancements in assets, operational efficiency projects, sourcing options, access to financing conditions, and the development of our product and service portfolio. A growing focus is placed on digital solutions that enable customer emissions reductions (enabling effect).

NOS's 2030 decarbonisation targets have been approved by the Science-Based Targets initiative (SBTi) and are fully aligned with the objectives of the Paris Agreement:

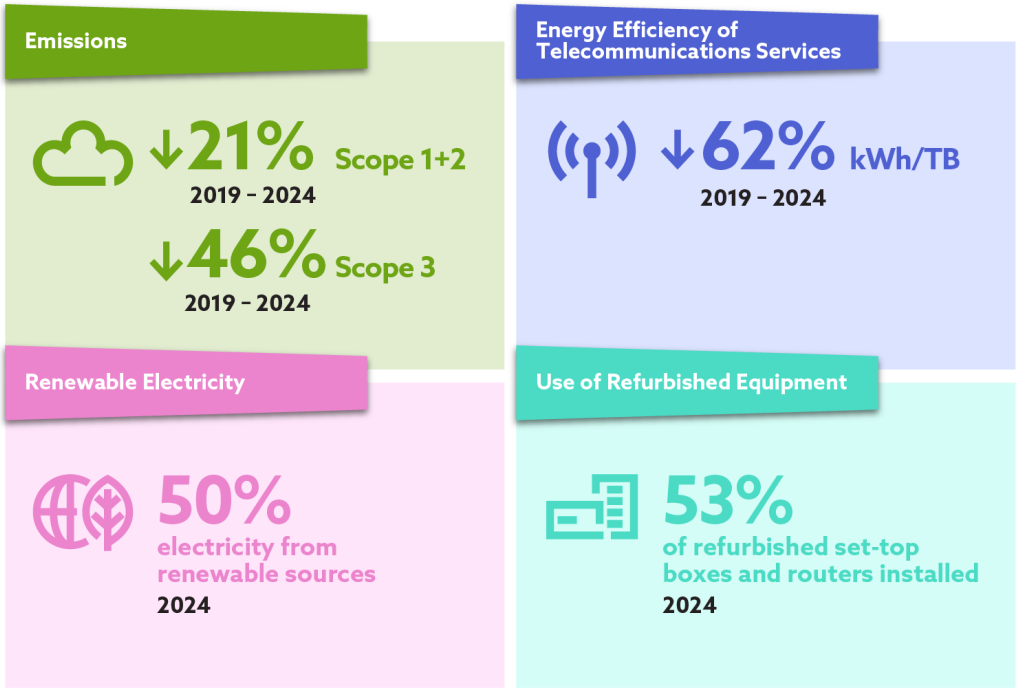
- 90% reduction in Scope 1+2 emissions: Science-Based Target aligned with a 1.5°C pathway, compatible with a decarbonisation trajectory specific to the Information and Communication Technologies (ICT) sector[1].
- 30% reduction in Scope 3 emissions: Science-Based Target aligned with a well-below 2°C pathway, compatible with the global decarbonisation trajectory defined by the SBTi[2].

[1] Guidance for ICT Companies Setting Science Based Targets. ITU, GeSI, GSMA and SBTi, 2020
[2] Absolute Contraction Approach, SBTi 2020

Decarbonisation levers and progress in implementation

(E1-1_03/E1-1_15) NOS's decarbonisation plan is structured around the following key levers:

- Own operations (Scope 1 and 2 emissions):
    - Increasing energy efficiency through a company-wide programme covering the telecommunications network, data centres, buildings, stores, fleet, and cinemas.
    - Reducing reliance on fossil fuels by electrifying the company fleet and progressively increasing the consumption of electricity from renewable sources.
- Value chain, both upstream and downstream (Scope 3 emissions):
    - Reducing emissions associated with the procurement of goods and services, prioritising the carbon footprint reduction of new equipment and increasing the reuse of used equipment.
    - Reducing emissions related to product and service usage, ensuring that customer equipment is increasingly energy efficient and promoting the use of energy-saving features.



Maintaining an adapted and resilient network

NOS's operations – particularly its technical infrastructure – are exposed to the physical risks of climate change. We have identified and assessed these risks and strengthened specific mitigation measures in our Business Continuity Management (BCM) programme and Network and Services Supervision processes, including:

- Resilience and response capacity assessment of our network and systems against failures, disruptions, or external events.
- Contingency procedures for extreme weather conditions.
- Identification of technical facilities located in high wildfire risk areas, with additional vegetation clearing procedures.
- Strengthening energy autonomy for critical facilities.
- Enhanced maintenance criteria in key technical rooms, adapted to the expected impacts of climate change in Portugal, including a higher number of extreme heat days and increased average temperatures.

In 2024, a specific risk assessment project continued for the main technical rooms across the country, including specific analyses for fire and flood risk, two of the main climate-related physical risks identified for our network operations.

Investments supporting the execution of the transition plan and alignment with the taxonomy regulation

(E1-1_04/E1-1_06/E1-1_08) The investments associated with the decarbonisation levers in NOS's climate transition plan are recognised under the European Taxonomy for environmentally sustainable activities. In 2024, a total of €38.4 million in CAPEX (9% of consolidated CAPEX) was classified as eligible but not aligned under the Taxonomy, covering energy efficiency measures, renewable energy production, and investments in data centres and the 5G mobile network.

NOS's economic activities fall under the Delegated Regulations on Climate Change Mitigation and Adaptation, according to the Taxonomy Regulation. The company generates revenue from activities classified as eligible for adaptation objectives (8.3 - Broadcasting and radio programming; 13.3 - Film, video, and television production, sound recording, and music publishing) and for mitigation objectives (8.1 - Data processing, hosting, and related activities; 8.2 - Data-driven solutions for reducing greenhouse gas (GHG) emissions). In 2024, NOS allocated a total of €55.3 million in eligible CAPEX and OPEX for the development of these activities, as well as for the acquisition of goods and services from supporting eligible activities (7.3 - Installation, maintenance, and repair of energy-efficient equipment, among others), aimed at increasing alignment with the Taxonomy criteria for climate adaptation and mitigation objectives.

Governance

(E1-1_14) The climate transition plan was developed under the supervision of the Chief Financial Officer (a member of the Executive Committee and the Board of Directors with direct responsibility for climate-related matters) and approved by the Executive Committee.

Its implementation is regularly evaluated by the Corporate Governance and Sustainability Committee, which is composed of non-executive directors and one executive director.

Exposure to fossil fuels, locked-in emissions, and compatibility with climate transition

(E1-1_01/E1-1_07/E1-1_12) NOS does not generate, nor does it plan to generate, revenue from activities related to coal, oil, or gas and has no assets that are incompatible with climate transition.The company is not excluded from the EU Paris-aligned benchmarks , as it does not generate revenue from fossil fuel extraction, exploration, distribution, or refining, nor from electricity generation with a carbon intensity above 100 g CO_2e/kWh.

There are no significant locked-in emissions associated with the company's main assets (technical infrastructure) and products (customer equipment). In both cases, their operation generates exclusively indirect emissions from the electricity consumed, and these emissions are significantly reduced through the measures outlined in the climate transition plan: consumption of renewable electricity (assets); and the combined effect of increasing energy

efficiency and reduced average carbon content of the grid electricity in Portugal (customer equipment).

1.3.2.1.2 Material impacts, risks, and opportunities and their interaction with strategy and the business model (ESRS 2 SBM-3/IRO-1)

NOS adopts a structured and systematic approach to identifying and assessing material impacts, risks, and opportunities related to climate change. This approach is aligned with internationally recognised external methodologies and the internal Enterprise Risk Management (ERM) methodology, which includes a Business Risk Model (BRM) that serves as a dedicated dictionary of risks and risk drivers.

Identification and assessment of climate change impacts

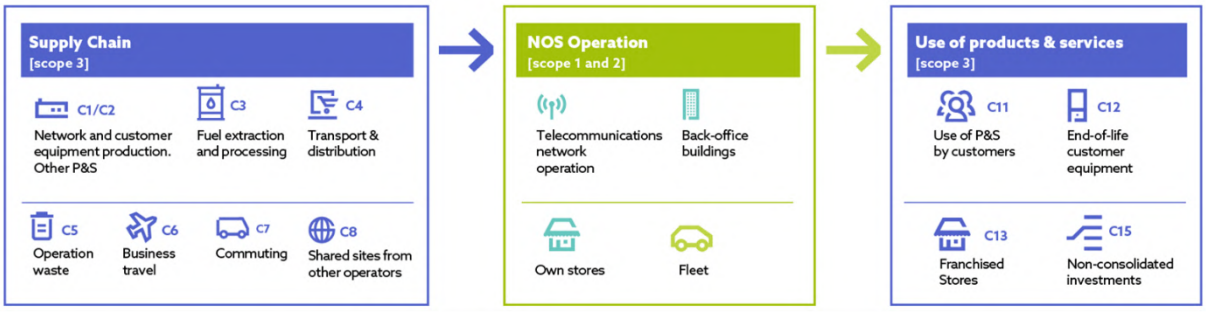
(E1.IRO-1_01 / E1.SBM-3_01) The main climate-related negative impact of NOS is the emission of greenhouse gases (GHG). NOS has conducted a comprehensive mapping of these emissions across its entire value chain:

- Own operations;
- Supply chain;
- Distribution, use, and end-of-life of products and services placed on the market.

The process was carried out in accordance with the requirements of The GHG Protocol methodology for defining organisational and operational boundaries, in-scope GHGs, and emission sources to be included.

The company maintains a complete corporate emissions inventory , compiled annually and externally verified. It also assesses the potential evolution of emissions through projections that are periodically updated to incorporate the most recent business planning information and the implementation of reduction measures outlined in its climate transition plan.

NOS also evaluates the positive climate impact of the digital solutions it places on the market and that help reduce its clients's emissions (climate enabling effect).



Climate change risks and opportunities

(E1.SBM-3_01) The risks and opportunities related to climate change are integrated into NOS's risk management model. We have identified the material risks and opportunities and continue to deepen their characterisation to enhance the assessment of the climate resilience of our strategy and business model.

Main climate risks and opportunities

Risks

Type	Transition	Physical		
	Regulatory	Acute	Acute	Chronic
Description	**Rising energy prices** New regulations that expand the scope or raise the rates of carbon pricing schemes could lead to an increase in electricity and fuel prices, with an impact on NOS' energy costs.	**Increased fire risk** The increase of extreme drought episodes and heat waves increases the fire risk, exposing our telecommunications network assets to physical damage, with an impact on NOS' capital costs (repair and replacement) and revenues (service disruption).	**More extreme weather events** The increased frequency and intensity of extreme rainfall and wind events expose our telecommunications network assets and other technical infrastructure to physical damage, with an impact on NOS' capital costs (repair and replacement) and revenues (service disruption).	**Rising average temperature** The structural rise in average temperature may cause an increased need for cooling in our telecommunications and IT technical infrastructure, with an impact on NOS' electricity consumption and respective costs.
Potential impact	Increase in OPEX Medium-term	Increase in CAPEX and OPEX. Reduction in revenue Short-term	Increase in CAPEX and OPEX. Reduction in revenue Long-term	Increase in OPEX Long-term
Response	Our operation's cross-cutting energy efficiency program mitigates risk by reducing energy consumption. New forms of energy procurement, in particular PPAs for the supply of renewable electricity, guarantee price predictability and limit the impact of the CO2 price on energy costs, reducing exposure.	Our Business Continuity Management and Network and Services Supervision processes include specific risk mitigation measures: mapping and fire risk rating of all access/transmission network infrastructures; additional vegetation clearance procedures; strengthening the energy autonomy of critical facilities; and automatic activation of alternative capacity (radio and satellite).	Our Business Continuity Management and Network and Services Supervision processes include specific measures to respond to extreme weather events: permanent monitoring of meteorological alerts; reinforcement of the energy autonomy of critical facilities; and automatic activation of alternative capacity (radio and satellite).	The energy efficiency program for technical facilities includes specific measures for managing cooling needs, which reduce risk exposure by limiting the consumption of HVAC equipment: insulation and containerisation of corridors in Data Centres and main technical rooms; revision of air flows; and adoption of free cooling solutions.

Opportunities

Type	Products & Services	Resource Efficiency	Markets
Description	**P&S that reduce emissions** The growing interest in telecommunications and IT solutions that reduce customer emissions, particularly in the business segment, constitutes a market opportunity for NOS' P&S, with significant potential for increasing revenues.	**Energy efficiency** The additional energy needs of data traffic, combined with rising electricity costs, reinforce the opportunity for cost reduction associated with energy efficiency programs in our operation.	**Sustainable financing and reputation** Integrating climate performance into investor decisions and financing conditions, as well as increasing environmental, social and corporate governance scrutiny, is an opportunity for NOS' climate strategy and performance.
Potential impact	Increased revenue Medium-term	OPEX reduction Short-term	Reduced financing costs and increased brand value Medium-term
Response	Our low carbon P&S portfolio is constantly expanding, incorporating Communication and Collaboration, Cloud and Data Centre, Internet-of-Things (IoT) and Analytics solutions which avoid travel, optimise energy consumption and provide energy-efficient data storage and processing infrastructures. The new 5G potential will allow us to develop new solutions and strengthen this offering.	Our operation's cross-cutting energy efficiency programme exploits this opportunity through measures to reduce energy consumption, particularly electricity, which generate cost reductions in our telecommunications network, Data Centres, support activities (buildings, stores and fleet) and cinemas.	NOS has adopted a Sustainability-Linked Financing Framework, in line with the market's best practices, which includes KPIs and targets for scope 1 and 2 and scope 3 emissions. The integration of climate targets into the business strategy and the adoption of a 1.5°C Science-Based Target reinforce the credibility of our climate strategy and contribute to the value of the NOS brand.

Identification and assessment of physical risks

The identification and assessment of climate-related physical risks uses elements of NOS's Enterprise Risk Management methodology, enabling for the identification of associated risks and opportunities and the definition of response actions. Climate-related physical risks are classified within the NOS Bussiness Risk Model (BRM) as operational risks and security and continuity risks. Depending on their nature, the analysis is conducted over different time horizons: short-term (e.g. exposure of the telecommunications network to wildfire risk) or medium/long-term (e.g. structural increase in average summer temperatures and its impact on the technical infrastructure).

The evaluation is conducted periodically, using predefined criteria to assign probability and impact levels, enabling risk prioritisation and the definition of appropriate responses. Risks exceeding the acceptance threshold (≥25) are integrated into the Annual Action and Resource Plans, approved by the Executive Committee. The assessment incorporates a climate projection-based approach for Southern Europe and the Mediterranean, based on IPCC scenarios, including high-emission scenarios (IPCC SSP5-8.5). However, the company has not yet carried out a comprehensive climate scenario analysis, and this process is currently under preparation.

NOS has defined time horizons for the assessment of physical risks, considering the lifespan of critical assets and strategic planning processes:

- Short-term (<1 year): includes the budget cycle and immediate risks, such as wildfires and extreme weather events already evident in the operating geography.
- Medium-term (1-5 years): aligned with strategic planning and corporate objectives, includes risks such as regulatory changes and shifts in consumer preferences.
- Long-term (>5 years): covers the analysis of structural impacts, such as rising average temperatures and their effects on network infrastructure and data centres.

The analysis of asset and business activity exposure to climate-related physical risks uses consistent criteria to determine probability, magnitude, and duration of impacts, considering data from past events and future projections. A more granular exercise will be conducted as part of the climate scenario analysis currently under preparation.

Identification and assessment of transition risks and opportunities

NOS identifies and assesses climate transition risks and opportunities, focusing on regulatory risks, shifts in consumer preferences, and opportunities related to energy efficiency and sustainable finance. These risks and opportunities are analysed within the NOS BRM, considering three time horizons:

- Short-term (<1 year): immediate risks such as existing climate regulation and energy efficiency opportunities.
- Medium-term (1-5 years): risks associated with new regulations, impacts on electricity prices, and opportunities for the development of sustainable products.
- Long-term (>10 years): strategic assessment of the long-term impacts of climate policies and market evolution.

The analysis includes an assessment of the financial impact of risks and opportunities, considering CO2 price projections under the European Emissions Trading Scheme and potential revenues from NOS's portfolio of solutions that reduce customer emissions. However, a comprehensive climate scenario analysis fully aligned with the recommendations of the Task Force on Climate-Related Financial Disclosures has not yet been conducted and is currently under preparation.

Resilience of strategy and business model

(E1.SBM-3_02 / E1.SBM-3_03 / E1.SBM-3_04 / E1.SBM-3_05 / E1.SBM-3_06 / E1.SBM-3_07)

Resilience analysis

The analysis of the resilience of NOS's strategy and business model to climate change is currently based on the assessment of:

i) the climate risks and opportunities to which the company is exposed;

ii) the respective implemented response mechanisms (risk management and mitigation processes, as well as opportunities maximisation).

This analysis incorporates elements of NOS's Enterprise Risk Management (ERM) methodology, including the Business Risk Model (BRM), which serves as a proprietary risk dictionary

(taxonomy and risk drivers). The process enables the identification of risks, opportunities associated with risk-enhancing factors, the impacted business strategy pillar , and the definition of response actions to manage the most relevant risks.

The analysis covers the entire value chain of NOS's various business segments and recognises both climate change mitigation (GHG emissions from NOS's operations and value chain) and adaptation (resilience of telecommunications and IT infrastructure to acute and chronic physical impacts).

The characterisation of transition risks considered carbon price projections in public policy scenarios aligned with 1.5°C decarbonisation pathways. The characterisation of physical risks took into account climate projections for Southern Europe and the Mediterranean region produced by reference entities[3]. The analysis was conducted over short-, medium-, and long-term time horizons, defined based on the nature of the risk, as well as business processes and the lifespan of the company's critical assets.

Results

The company's strategy and business model possess resilience characteristics against the physical, regulatory, and market consequences of climate change, according to the conducted analysis.

The identified climate risks and opportunities influence our business strategy—shaping the products and services we bring to market and how we manage our operations and value chain—as well as our resource planning (revenues, capital costs, and operational costs).

NOS has adopted a science-based target, validated by the Science-Based Targets initiative, which aligns with a 1.5°C scenario:a 90% reduction in operational emissions by 2030. The implementation of this target is supported by a comprehensive energy efficiency programme and new renewable electricity procurement models (currently under definition), which reduce exposure to major transition risks.

The exposure to physical risks is minimised through: i) Acute risks – strengthening Business Continuity Management and Network and Services Supervision processes, including enhanced fire risk management and response measures for extreme weather events; ii) Chronic risks – specific cooling management measures for key technical facilities.

Opportunities in products and services are captured through: i) The continuous expansion of NOS's portfolio of solutions that reduce customer emissions; ii) The energy efficiency programme across operations, leveraging resource efficiency opportunities; iii) The adoption of a Sustainability-Linked Financing Framework, which integrates the company's Science-Based Targets, enables access to new capital market opportunities, and enhances NOS's brand value and reputation.

NOS has the capacity to implement further adjustments to its strategy and business model, if necessary, to reinforce its resilience to climate change. NOS's climate transition plan positively impacts the company's access to funding. The sustainable financing framework, aligned with Sustainability-Linked Loan Principles (SLLP) and international best practices, establishes financing conditions indexed to climate targets. Currently, 92% of NOS's total debt is linked to sustainability objectives, the majority of which are climate-related.

Our key assets—the technical infrastructure supporting telecommunications and IT services—have short technological update cycles, increasing flexibility to integrate features that enhance resilience to transition risks (e.g. more energy-efficient equipment) and physical risks (e.g. new

[3] Intergovernmental Panel on Climate Change (IPCC); European Environment Agency (EEA); Joint Research Centre – European Commission.

service redundancy solutions, new routes, automatic activation of alternative capacity). Our product and service offering already includes a portfolio of solutions that reduce customer emissions, with a strong focus on the corporate segment. The potential of 5G technology further expands this portfolio. In the residential segment, particularly in fixed services, customer equipment (TV set-top boxes and routers) is becoming increasingly more energy efficient, and this trend is expected to continue.

Next steps

NOS has not yet conducted a comprehensive climate scenario analysis. This process is currently under preparation and will be developed in 2025 with the support of specialised expertise. A quantitative analysis of the potential financial impacts of risks and opportunities will be conducted under different physical, regulatory, and market climate change scenarios, completing the climate resilience assessment of our strategy and business model and reducing uncertainty, particularly in the long-term financial quantification of physical risks (beyond 5 years).

The scenario analysis will be conducted in accordance with the Task Force on Climate-Related Financial Disclosures (TCFD) guidelines, including the definition of critical assumptions, time horizons, and the integration of existing risk response strategies (actions and resources for climate change mitigation and adaptation).

Compatibility of assets and activities with climate transition

(E1.IRO-1_14) NOS has not identified any assets or business activities that are incompatible with the climate transition. The company's key assets (technical infrastructure) and products (customer equipment) generate only indirect emissions from electricity consumption, which are minimised through the use of renewable electricity and energy efficiency measures. Furthermore, the company has activities covered by the European Union Taxonomy , with segments of its portfolio recognised as contributing to both climate change mitigation and adaptation.

Management of impacts, risks, and opportunities

1.3.2.1.3 Policies (E1-2)

(E1.MDR-P 01_06 / E1-2_01) The key corporate policies related to climate change mitigation and adaptation are:

- NOS Sustainability Policy
- Sustainability Requirements for NOS Suppliers and Partners

A detailed description of these policies can be found in section "1.3.1.12 Policies (MDR-P)"

The relationship between the policies and climate change mitigation and adaptation is presented in the following table:

	Theme	Approach to the theme in the policy
NOS Sustainability Policy	Climate change mitigation	The fight against climate change through the implementation of mitigation measures is one of the guiding principles of the environmental pillar (In the Name of the Planet) of the Policy.
	Climate change adaptation	The fight against climate change through the implementation of adaptation measures is one of the guiding principles of the environmental pillar (In the Name of the Planet) of the Policy.
	Energy efficiency	Reducing energy consumption and associated emissions, as well as implementing sustainable mobility practices, are guiding principles of the environmental pillar (In the Name of the Planet) of the Policy.
	Renewable energy	Reducing emissions associated with energy consumption is one of the guiding principles of the environmental pillar (In the Name of the Planet) of the Policy. Given NOS's emissions profile (90% of scope 1 and 2 GHG emissions are associated with electricity consumption), the use of renewable electricity is the key measure for reducing carbon emissions in its own operations.
	Other	Other guiding principles of the environmental pillar (In the Name of the Planet) of the Policy include: pollution prevention; rational use of resources and proper waste management; biodiversity and ecosystem protection; and promoting the circularity of NOS's business through the reuse, resale, or recycling of network and customer equipment, positively influencing the entire value chain, with additional benefits in emissions reduction and climate change mitigation.
Sustainability Requirements for NOS Suppliers and Partners	Climate change mitigation	The Requirements establish that, whenever requested, Suppliers and Partners must collaborate in setting and achieving energy consumption or emissions reduction targets defined under NOS's sustainability strategy. The Requirements also include a recommendation that Suppliers and Partners monitor the energy consumption associated with activities carried out for and/or at NOS and adopt measures to improve the energy and carbon efficiency of the goods and services provided to the company.
	Energy efficiency	The Requirements establish that, whenever requested, Suppliers and Partners must collaborate in setting and achieving energy consumption or emissions reduction targets defined under NOS's sustainability strategy. The Requirements also include a recommendation that Suppliers and Partners monitor the energy consumption associated with activities carried out for and/or at NOS and adopt measures to improve the energy and carbon efficiency of the goods and services provided to the company.

1.3.2.1.4 Actions and resources related to climate change policies (E1-3)

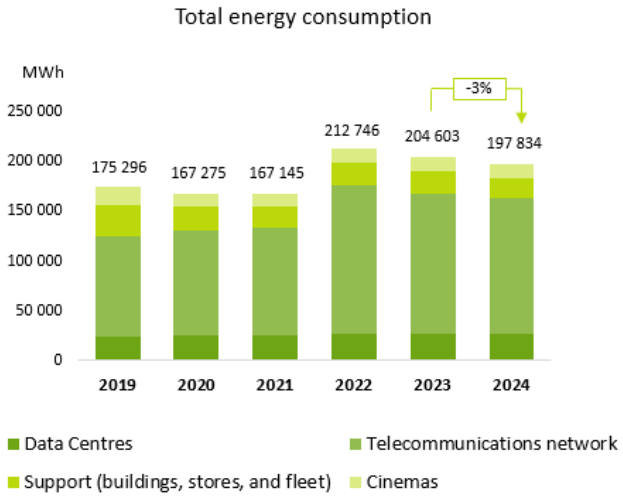
(E1.MDR-A_01-12 / E1-3_01 / E1-3_03 / E1-3_04 / E1-3_06 / E1-3_07 / E1-3_08)

Energy efficiency

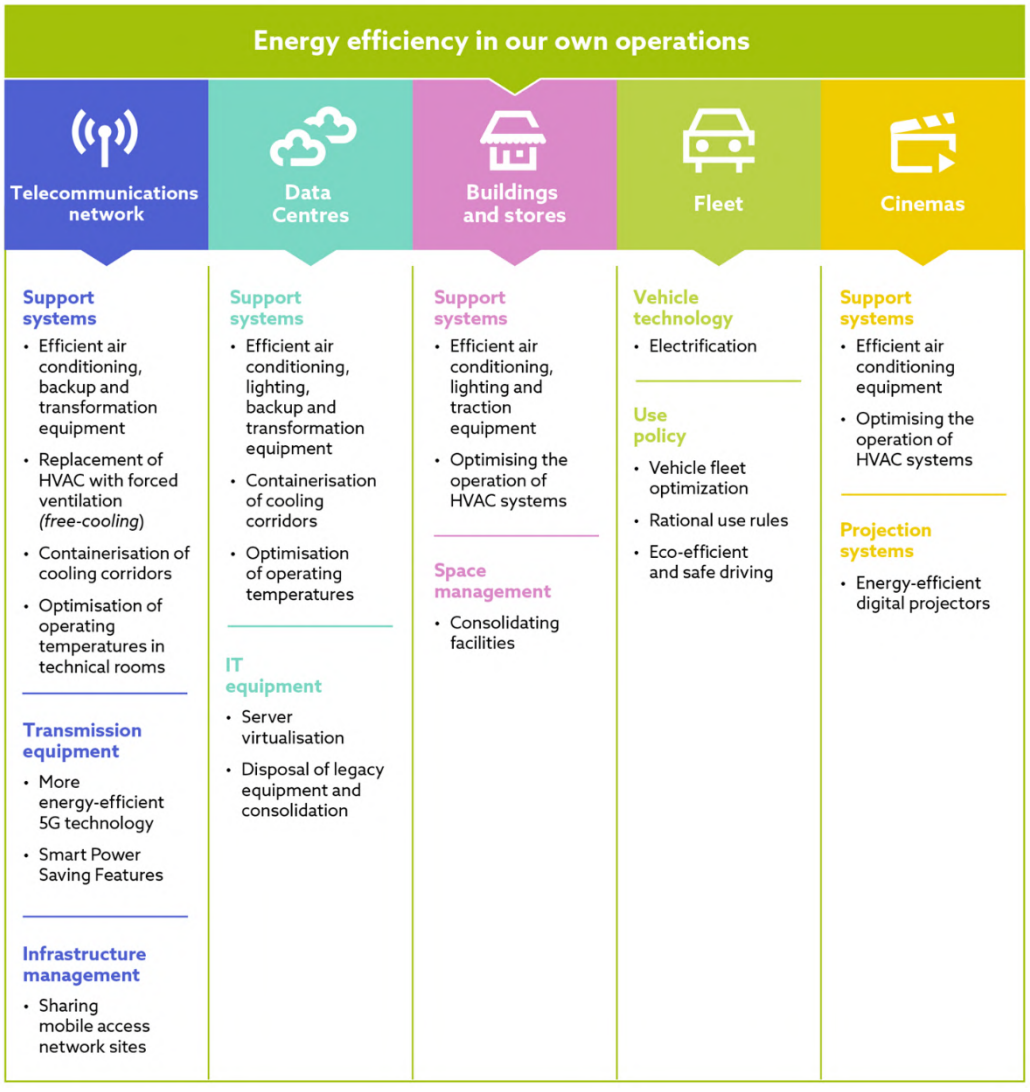
NOS has defined a comprehensive energy efficiency programme covering all operational areas and is also investing in self-generation of renewable electricity. The measures implemented in 2024 in these areas involved an investment of €10.2M and resulted in an estimated reduction of approximately 1,400 tCO2e.

With the new measures set to be implemented from 2025 onwards—either already approved or in the initial stages of execution—an additional annual emissions reduction of approximately 1,000 tCO2e is estimated.

In 2024, the energy efficiency programme played a key role in achieving a 3% reduction in total energy consumption across NOS operations.



Our energy efficiency program



Technical infrastructure

In 2024, the implementation of energy efficiency measures in the telecommunications network and Data Centres continued. Despite a 20% increase in data traffic, the total energy consumption of the technical infrastructure decreased by 2.5% compared to 2023.

The sites of our 5G mobile access network use intelligent energy management features (Power Saving Features, PSF) based on analytical usage prediction models. After the first phase—completed in 2023, which resulted in consumption reductions between 3% and 8% depending on site typology, for similar traffic loads —we are preparing the activation of new features in 2025, aiming for further savings.

In main technical rooms, the replacement of HVAC, backup, and power conversion systems with high-efficiency equipment continued throughout 2024. Free cooling solutions, which use outside air instead of mechanical cooling, were also expanded, reducing energy requirements. For 2025, additional implementation of cold aisle containment solutions is planned to prevent air heating in contact with the equipment.

At the beginning of 2024, NOS signed a new network-sharing agreement with another telecom operator, now for the fibre optic network. This initiative complements the mobile access network-sharing project in remote regions, already implemented, reinforcing energy efficiency gains in service delivery to our customers, now in the fixed network segment.

Support activities

Energy consumption in back-office buildings has been consistently decreasing due to measures implemented in previous years, including: space consolidation; in-house thermal energy production through heat pumps; and modernisation of HVAC systems and elevators. Between 2023 and 2024, these measures resulted in a 10% reduction in energy consumption in these spaces.

In our own car fleet, the electrification plan continued, with electric vehicles accounting for 44% of the total fleet by the end of the year. Total energy consumption decreased by 9% compared to 2023.

In the retail network, following the lighting overhaul completed in 2023, automated systems were installed to ensure that test equipment and display units shut down after store closing hours. Additionally, HVAC systems were replaced with more energy-efficient models. These measures helped contain energy consumption growth (+4% vs 2023), despite an increase in both the number and size of stores.

Cinema theatres

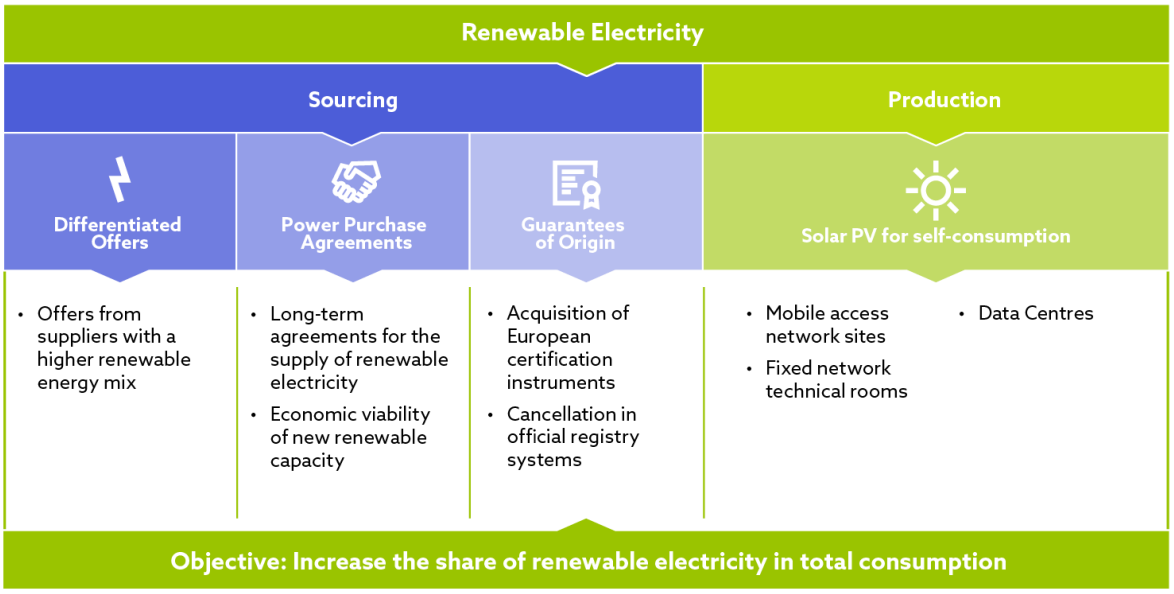
In our cinema theatres, the replacement of HVAC systems with more energy-efficient technologies continued, leading to a 4% reduction in total energy consumption (vs 2023) and simultaneously eliminating the need for natural gas for heating. Additionally, projection systems were replaced with next-generation, energy-efficient equipment.

Renewable electricity

Our strategy to progressively increase renewable electricity consumption involves sourcing from suppliers that provide electricity with a higher share of renewable energy sources, while simultaneously exploring different market options and contractual models, namely long-term

bilateral agreements (Power Purchase Agreements - PPAs), 100% renewable electricity supply offers, or certification instruments (Guarantees of Origin).

In addition, we are also progressing with self-generation projects, including micro-generation at mobile and fixed network sites and, from 2025 onwards, a larger-scale solar photovoltaic system at one of our Data Centres.



Supply chain

Emissions in the value chain, both upstream (supply chain) and downstream (customer use of products and services), account for an average of approximately 80% of our carbon footprint. Engaging suppliers, partners, and customers in reducing energy and material consumption is essential to achieving our decarbonisation and circularity goals.

Based on specific supplier information, we monitor the emissions associated with the production and transport of the equipment we procure for our customers and are progressively incorporating this variable into purchasing decisions. In 2024, the average carbon footprint of each new device we purchased was 18% lower than the estimated footprint for 2019 in the case of mobile phones and 20% lower for TV set-top boxes and routers.

Reusing equipment also contributes to reducing supply chain emissions. In 2024, 53% of the set-top boxes and routers we installed were refurbished devices, thereby avoiding the energy consumption and emissions associated with manufacturing new products.

The plan to mitigate upstream emissions in the value chain also includes installing photovoltaic solar panels at the logistics centre that supports our operations, in collaboration with our logistics partner. This system currently supplies approximately 30% of the electricity needs of the facility.

In 2024, NOS reviewed its business mobility policy, adopting new rules to rationalise air travel usage, leading to a reduction in emissions from this Scope 3 category.

We launched the first phase of our supplier ESG assessment system. A new assessment questionnaire was sent to 174 critical suppliers, classified based on criteria including their estimated contribution to total emissions from the production of the goods and services we procure. These results will form the basis for defining new emission reduction initiatives.

Use of products and services

To reduce downstream emissions in the value chain, we are strengthening energy efficiency criteria for TV set-top boxes and routers and developing engagement campaigns to encourage greater use of energy-saving features in these devices.

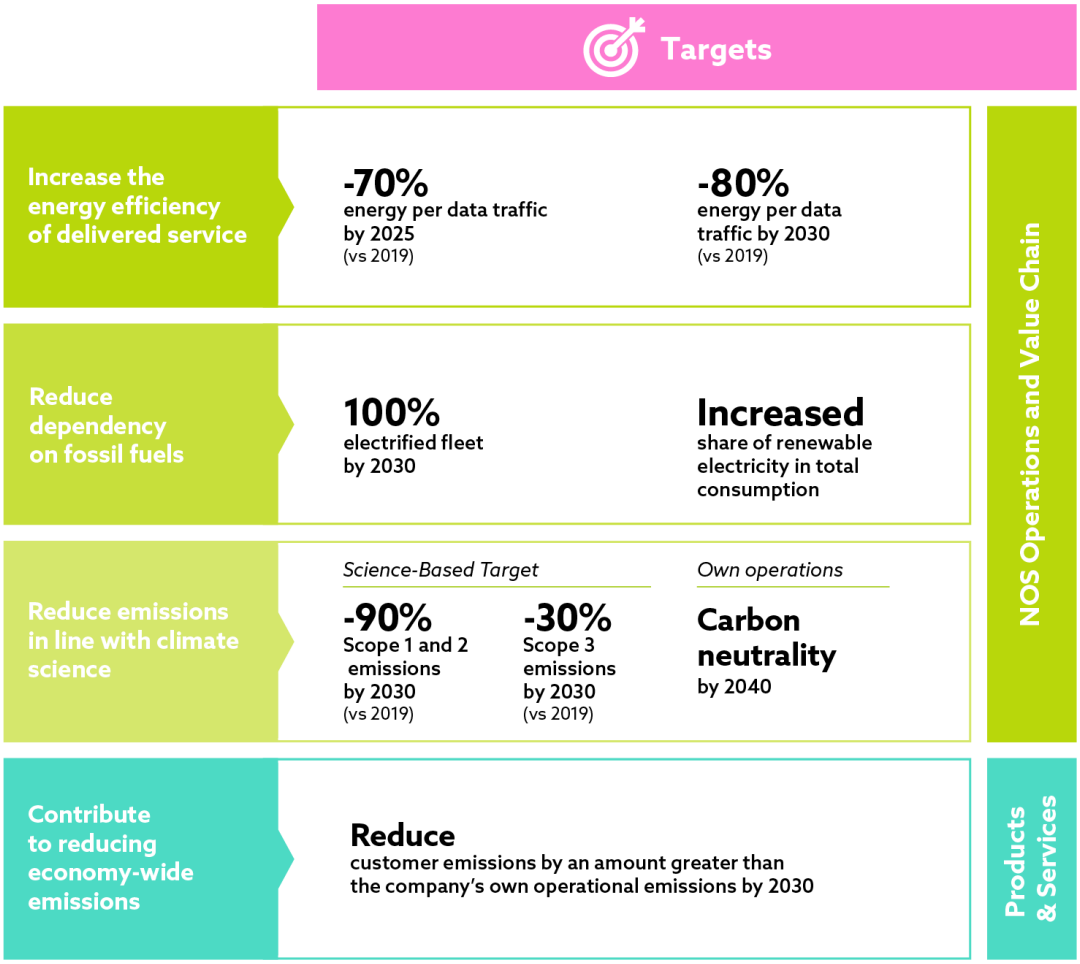
In 2024, we completed the implementation of a new deep stand-by mode in the latest generation of our cable set-top boxes, significantly reducing energy consumption.

Since 2019, the average annual energy consumption of the new set-top boxes we install has decreased by 47%, while router energy consumption has been reduced by 53%.

Metrics and targets

1.3.2.1.5 Targets related to climate change mitigation and adaptation (E1-4)

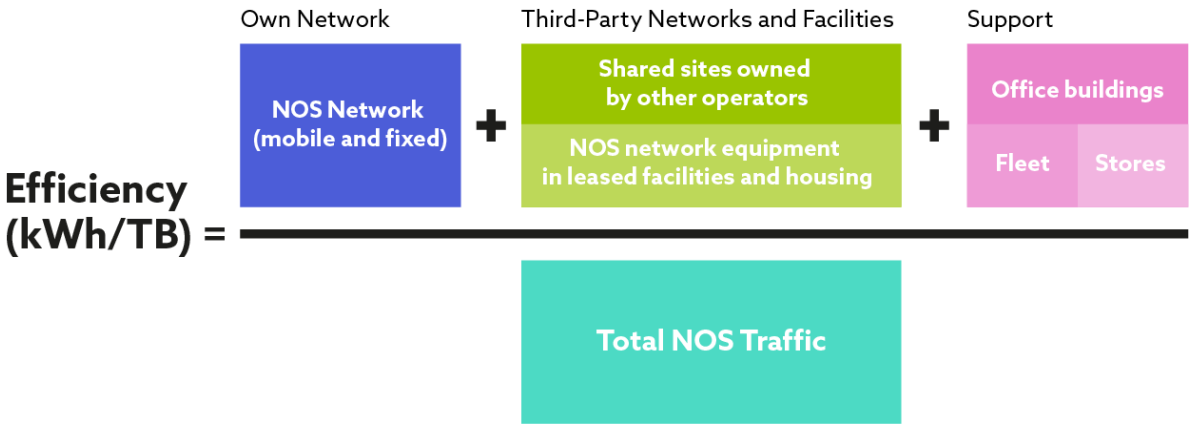
(E1.MDR-T_01-13/E1-4_03)



Energy efficiency of operations and telecommunications services

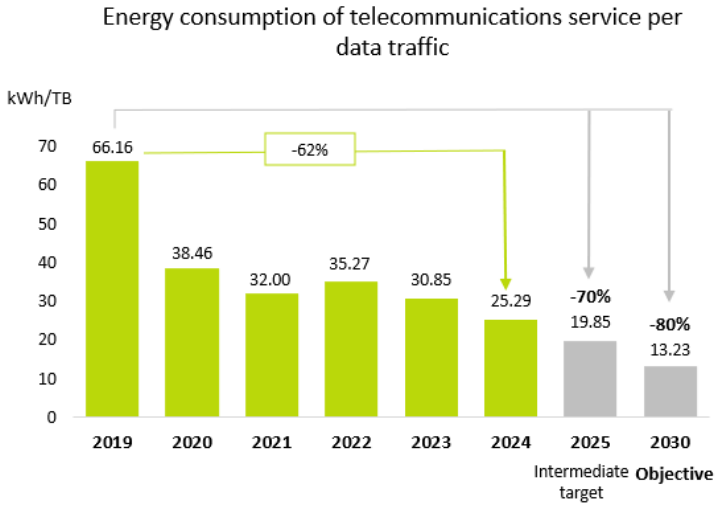
To measure the energy performance of our core business, we use an energy efficiency indicator for the telecommunications service we provide, considering all activities required for its delivery, whether in our own facilities or those of third parties. Our goal is to achieve an 80% reduction in this indicator by 2030, compared to the 2019 baseline , with an intermediate target of -70% by 2025.

Telecommunications service energy efficiency indicator



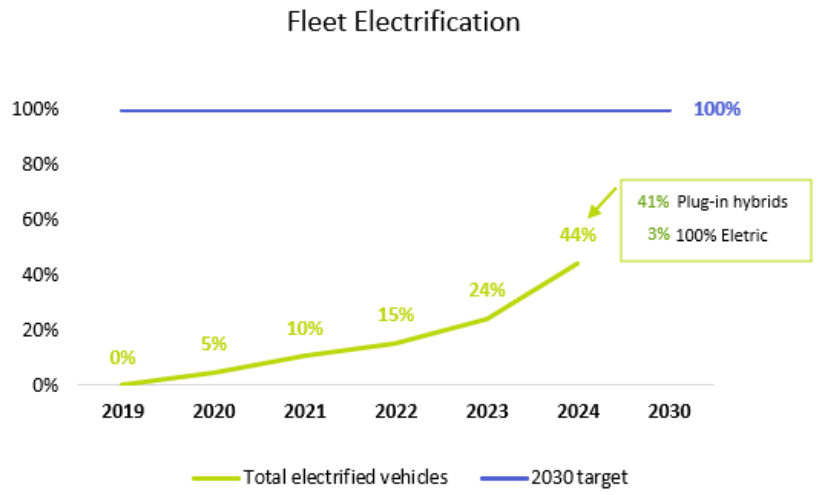
Note: Excludes energy consumption in own facilities that do not contribute to telecommunications services (Data Centres dedicated to data processing and storage services and cinema theatres).

In 2024, NOS continued to contain absolute energy consumption allocated to Telco services (-1.5%), despite a 20% increase in transmitted data volume, highlighting the impact of efficiency measures and the energy performance of 5G technology. The consumption per traffic indicator decreased by 18% compared to the previous year, standing 62% below the 2019 value, putting us on track to meet the 2030 target and the intermediate 2025 goal.



Fleet electrification and renewable electricity consumption

At the end of 2024, 44% of our fleet consisted of electrified vehicles (41% plug-in hybrids and 3% fully electric), representing a 20 p.p. increase compared to the previous year.



Throughout the year, the renewable percentage of total electricity consumption reached 50%, corresponding to the renewable fraction of the electricity suppliers' offers, weighted by the volumes supplied. This percentage represents a 21 p.p. increase compared to 2023, reflecting the progressive decarbonisation of electricity generation in the national electricity market.

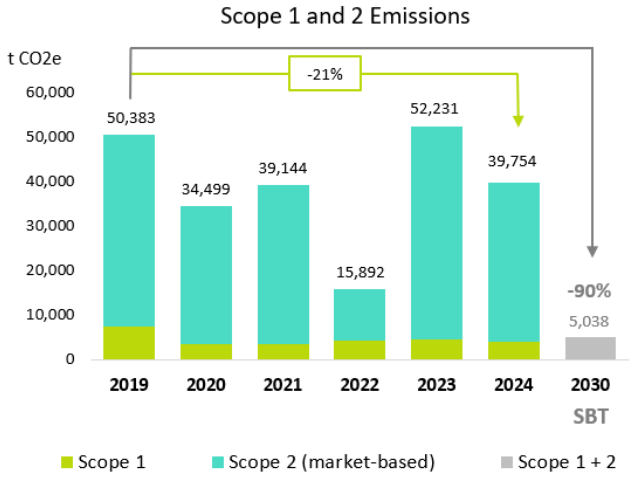
Own operations emissions (Scope 1 and 2)

NOS own operations emission reduction target (Science-Based Target 1.5ºC, approved by SBTi) was defined and is monitored based on Scope 2 emissions calculated using the market-based method. In 2024, total Scope 1 and 2 (market-based) emissions recorded a 24% reduction compared to 2023.

For Scope 1, the 12% decrease resulted from a reduction in fuel consumption in the company's car fleet (electrification and more efficient combustion engines) and a decrease in fluorinated gas leaks during equipment maintenance operations.

For Scope 2, the 25% decrease was driven by a reduction in electricity consumption (-3%, as a result of energy efficiency measures) and a 23% reduction in the average carbon content of the electricity purchased[4].

[4] Scope 2 emissions calculated using the location-based method recorded a 32% decrease compared to 2023, driven by a 3% reduction in electricity consumption and a 31% decrease in the average carbon content of the electricity grid in Portugal.



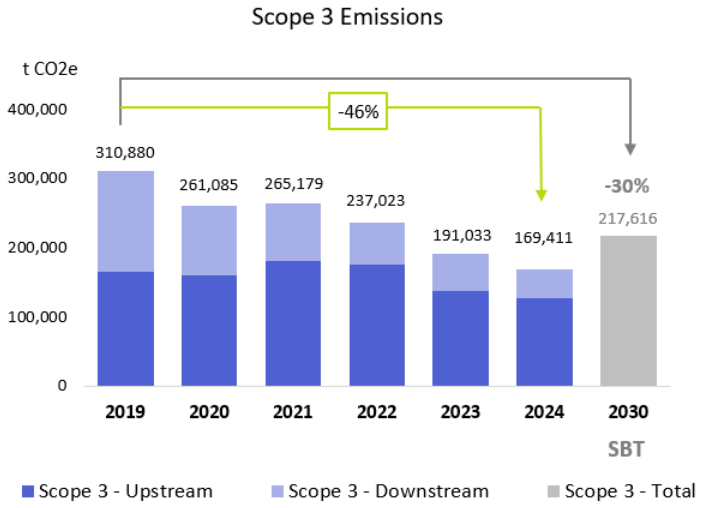
Parallel to this – voluntarily and not included in the emissions inventory – we mitigate an amount of emissions equivalent to our Scope 1, outside the value chain. This is achieved through carbon sequestration from a reforestation project in fire-affected areas in Northern and Central Portugal, which we continue to support. This initiative combines carbon capture, biodiversity protection, and natural wildfire resistance enhancement. This exercise allows us to gain insights into the use of this type of instrument. NOS is awaiting the definition of detailed eligibility criteria for instruments to be used for the neutralisation of residual emissions and will align its use with international best practices.

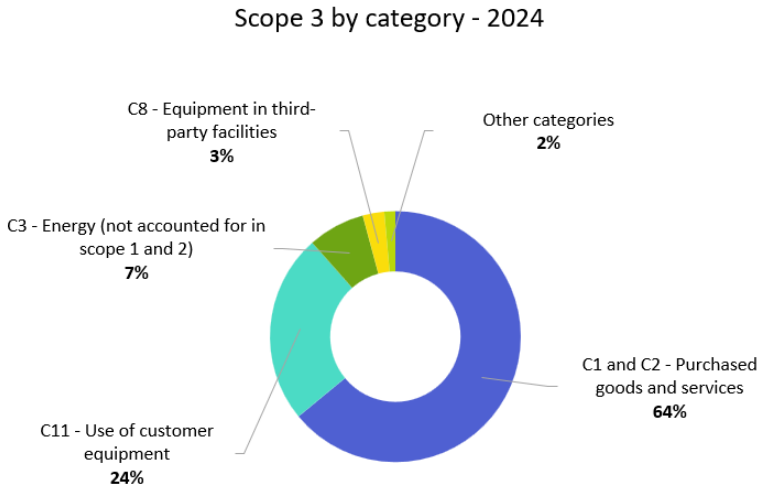
Value chain emissions – upstream and downstream (Scope 3)

In 2024, Scope 3 emissions decreased by 11% compared to 2023.

Upstream, the reduction (-21%) was driven by an 8% decrease in emissions associated with the production of products, services, and capital goods purchased during the year (categories 1 and 2). The carbon footprint of the production and transportation of customer equipment decreased globally, reaching 44 kg CO2e per device for mobile phones, 10 kg CO2e per device for set-top boxes, and 28 kg CO2e per device for routers. Additionally, the use of refurbished equipment, particularly in the fixed segment, reduced purchasing needs. For other procurement categories, the evolution was determined by changes in expenditure (CAPEX and OPEX). Together, categories 1 and 2 accounted for 64% of total Scope 3 emissions.

Downstream, the reduction (-11%) resulted from the evolution of emissions associated with electricity consumption in third-party facilities (category 8) and the electricity consumption of customer equipment sold or provided by NOS (category 11). In both cases, the decrease benefited from the lower average carbon intensity of electricity consumed in Portugal. Categories 8 and 11 combined accounted for 27% of total Scope 3 emissions.





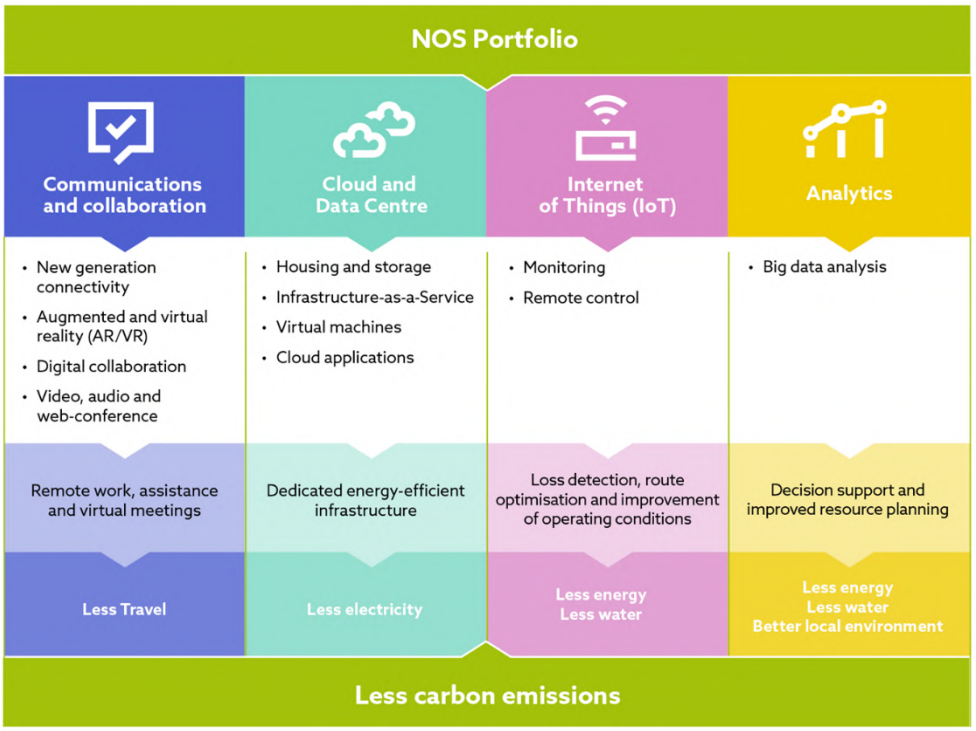
Avoided emissions through the use of products and services

NOS is committed to being an active agent in the climate transition of the Portuguese economy. Our goal is to reduce customer emissions by an amount greater than our own operational emissions by 2030.

A detailed methodology for monitoring this target has not yet been defined. Quantifying the emission reduction benefits of digital solutions – the climate enabling effect – remains a complex exercise, with methodologies still evolving. Through our participation in the European Green Digital Coalition, we are closely following these developments and plan to conduct an initial simplified application of these methodologies to a selected group of our products and services.

Our portfolio includes solutions – particularly for the business segment – in Communications and Collaboration, Cloud and Data Centre, IoT (Internet of Things), and Analytics, which help avoid travel, reduce energy and water consumption, and provide secure and energy-efficient data storage and processing infrastructures. In 2024, our portfolio included more than 20 solutions, including the recently launched NOS Smart Home – a home automation system

featuring optimised control functionalities for lighting, climate control, and other devices, enhancing energy efficiency.



These products and services, recognised as eligible activities under the EU Taxonomy for environmentally sustainable activities, represented 2% of NOS's consolidated revenue in 2024, corresponding to 8% of revenue in the business segment.

Accounting principles

(E1-4_01 / E1-4_02 / E1-4_03 / E1-4_04 / E1-4_05 / E1-4_06 / E1-4_07 / E1-4_08 / E1-4_09 / E1-4_10 / E1-4_11 / E1-4_12 / E1-4_13 / E1-4_14 / E1-4_15 / E1-4_16 / E1-4_17/ E1-4_18 / E1-4_20 / E1-4_21 / E1-4_22)

Energy efficiency of telecommunications services

The target covers 100% of the energy consumption associated with the provision of NOS telecommunications services (the company's core business).

The monitoring metric (KPI) is the ratio between energy consumption related to telecommunications services (expressed in kWh) and the respective data traffic (expressed in Terabytes). Energy consumption (numerator) includes fuel, electricity, and thermal energy required for the delivery of NOS telecommunications services, both in own infrastructure (mobile and fixed telecommunications networks and support services – back-office buildings, retail network, and company fleet) and in third-party facilities (shared sites of other operators and leased facilities). It excludes energy consumption in NOS-owned activities that do not contribute to the telco business (Data Centres dedicated to data processing and storage and cinema network within our Media & Entertainment business segment). Data traffic (denominator) includes all mobile and fixed traffic, including non-linear TV (streaming).

The baseline year (2019) and target year (2030) are aligned with NOS's Science-Based Target, approved by the SBTi. An intermediate target for 2025 (-70% of the KPI compared to the baseline year) was also set.

In 2019, the kWh/TB ratio was 66. The target is to reach a value of 13 by 2030 (-80% compared to the 2019 baseline).

Fleet electrification

The target covers 100% of NOS's own vehicle fleet, including passenger and light commercial vehicles, both used exclusively for operational support and assigned to employees for professional and personal use .

The monitoring metric (KPI) is the ratio between the number of electrified vehicles (disaggregated into plug-in hybrid vehicles and fully electric vehicles) and the total number of vehicles in the fleet at the end of the year.

The target year (2030) is aligned with NOS's Science-Based Target, approved by the SBTi. The target format does not involve defining a baseline year.

Renewable electricity consumption

The monitoring metric (KPI) is the ratio (expressed as % MWh/MWh) between the consumption of electricity generated from renewable sources (renewable self-generation and procurement from third parties of electricity certified through appropriate attribute tracking systems) and total electricity consumption.

The recognition criteria for renewable electricity accounting are aligned with the technical requirements of the RE100 initiative.

Operational emissions (Scope 1 and 2)

The target covers 100% of NOS's Scope 1 and 2 GHG emissions across all business segments, in line with the GHG emissions inventory reporting boundaries. Scope 2 emissions are accounted for and monitored using the market-based method. The inventory is prepared according to the GHG Protocol methodology, adopting a financial control consolidation approach, with no control (financial or operational) over any activities or entities outside the consolidation perimeter. The target includes all GHGs applicable to the company's activities (CO_2, N_2O, CH_4, and HFCs).

The monitoring metric (KPI) is the total Scope 1 and 2 emissions, expressed in tCO_2e, based on Global Warming Potential (GWP) values used in the most recent edition of the National Emissions Inventory prepared by the Portuguese Environment Agency (currently IPCC 5th Assessment Report).

Scope 1 emissions include: Mobile combustion of fossil fuels (petrol and diesel in the company's passenger and light commercial fleet); stationary combustion of fossil fuels (natural gas heating in some back-office buildings and cinema theatres, and diesel in emergency generators); and fugitive emissions of fluorinated gases (from air conditioning equipment and fire suppression systems). Scope 2 emissions include: emissions associated with the production of electricity purchased from third parties for consumption in the company's facilities; emissions associated with the production of thermal energy (heat and cooling) purchased from third parties and consumed in some back-office buildings and cinema theatres. Scope 2 emissions are accounted for using the market-based method and represent approximately 85% of total Scope 1 and 2 emissions (baseline year values).

The target was modelled using the SBTi ICT Sector Guidance[5] methodology and is aligned with decarbonisation pathways for the telecommunications and information technology sector compatible with a 1.5°C global warming scenario. This alignment ensures compliance with national (Portuguese Climate Law), European (Fit for 55 package and European Climate Law), and international (Paris Agreement) climate policy objectives. It was formally approved as a Science-Based Target 1.5°C by the SBTi in 2021.

The reference for measuring performance is the total Scope 1 and 2 emissions of NOS in 2019. The year 2019 was chosen as the baseline because: i) it represents a period in which the company's business segments, geographies, asset types, and product and service portfolio are considered representative in terms of GHG emissions; ii) it corresponds to the first reporting year for which NOS has a complete GHG emissions inventory, including all applicable Scope 3 emissions, with independent external verification. The company has maintained a complete and verified Scope 1 and 2 emissions inventory since 2015, but chose 2019 as the reference year to ensure consistency in the timeframe of its targets across all emission scopes.

In 2019, total market-based Scope 1 and 2 emissions amounted to 50,383 tCO_2e. The objective is to reduce this value to 5,038 tCO_2e by 2030, representing a 90% reduction compared to the 2019 baseline.

The target was approved as a Science-Based Target 1.5°C by the SBTi, aligning with the global objective of limiting global warming to 1.5°C.

Value Chain Emissions – Upstream and Downstream (Scope 3)

The target covers 100% of NOS's Scope 3 GHG emissions across all business segments, in accordance with the accounting boundaries of the company's GHG emissions inventory. The inventory is prepared in line with the The GHG Protocol methodology, adopting a financial control consolidation approach, meaning that no financial or operational control is exercised over any activity or entity outside of from the reporting scope. The target includes all applicable GHGs related to the company's activities (CO_2, N_2O, CH_4, and HFCs).

The monitoring metric (KPI) is the total Scope 3 emissions, expressed in tCO_2e, based on Global Warming Potential (GWP) values used in the latest edition of the National Emissions Inventory prepared by the Portuguese Environment Agency (currently IPCC 5th Assessment Report).

The target includes 100% of emissions across all applicable Scope 3 categories defined by The GHG Protocol and relevant to NOS's activities. For Category 4 (upstream transportation and distribution) and Category 9 (downstream transportion and distribution), emissions are reported together due to operational data limitations. Categories 10 and 13 do not apply to NOS, as the company's products and services are not subject to further processing after sale, and NOS does not lease facilities to third parties.

The target was modeled using the SBTi Absolute Contraction Approach[6] and aligns with a global decarbonization trajectory compatible with a well-below 2°C warming scenario. This also ensures alignment with climate policy objectives at the national (Portuguese Climate Law), European (Fit for 55 legislative package and European Climate Law), and international levels (Paris Agreement). It was formally approved as a Science-Based Target Well-Below 2 Degrees by the SBTi in 2021.

The reference point for performance measurement is NOS's total Scope 3 emissions in 2019. The 2019 baseline was chosen because: i) it represents a period in which the company's business segments, geographies, asset types, product and service portfolio, and overall scale of

[5] Guidance for ICT Companies Setting Science Based Targets. ITU, GeSI, GSMA and SBTi, 2020.
[6] Absolute Contraction Approach, SBTi 2020.

activities are considered representative in terms of GHG emissions; ii) it corresponds to the first reporting year for which NOS has a complete Scope 3 GHG inventory with independent external verification. Choosing 2019 as a baseline ensures consistency in the timeframe of NOS's emission targets across all scopes.

In 2019, total Scope 3 emissions amounted to 310,880 tCO_2e. The target is to reduce this value to 217,616 tCO_2e by 2030, representing a 30% reduction compared to the 2019 baseline.

Carbon Neutrality of NOS's Own Operations

The target covers 100% of NOS's Scope 1 and 2 GHG emissions across all business segments, in accordance with the accounting boundaries of the associated reduction target (SBT).

The monitoring metric (KPI) is the total Scope 1 and 2 emissions, calculated according to the monitoring methodology associated with the reduction target, deducted from the residual neutralized emissions.

This target was established within the European Green Digital Coalition, of which NOS is a founding member. It complies with the SBTi requirements for the approval of carbon neutrality targets for Scope 1 and 2, assuming neutralization only for residual emissions after achieving the 90% reduction target by 2030, approved by SBTi as a Science-Based Target 1.5°C.

NOS is currently awaiting detailed eligibility criteria for the instruments to be used for residual emissions neutralization and will align its application with international best practices.

Avoided Emissions through the Use of Products & Services

The target covers the reduction of NOS customers' emissions, driven by the use of the company's portfolio of digital products and services which prevent emissions, compared to a baseline scenario.

The portfolio of in-scope products and services is categorized as follows: i) communications & collaboration: next-generation connectivity, augmented and virtual reality, digital collaboration, and video, audio, and web conferencing. These functionalities enable remote work, remote assistance, and virtual meetings, reducing the need for travel; ii) cloud & data centre: housing, storage, infrastructure-as-a-service, virtual machines, and cloud applications. These high-efficiency dedicated infrastructures reduce electricity consumption compared to customers' local infrastructures; iii) IoT (internet of things): monitoring and remote control systems. These include losses detection, route optimization, and operational condition improvements, optimizing energy and water consumption; iv) analytics (big data analysis): decision-support functionalities and improved resource planning, leading to reduced energy and water consumption and improved local environmental conditions.

The monitoring metric (KPI) is the ratio (t CO_2e / t CO_2e) between the annual avoided emissions in the customer's operations through the use of NOS products and services in the covered categories and NOS's total Scope 1 + Scope 2 emissions for the same period.

As part of NOS's 2025-2030 business and sustainability strategy review, the target year was adjusted to 2030 to align with the company's other energy and climate objectives. The detailed monitoring methodology is currently under development.

Additional monitored metrics related to this target include:

i) Ratio (expressed as % €/€) between the revenue generated by NOS's sales of products and services that reduce customer emissions and NOS's total consolidated revenue. This includes revenues from business customers in the following product & service categories: Communications & Collaboration, Cloud & Data Centre, and Analytics.The identification of eligible products and services follows the list of activities defined under the EU Taxonomy for environmentally sustainable activities, as per the Climate Delegated Act (Delegated Regulation (EU) 2021/2139).

1.3.2.1.6 Energy consumption and energy mix (E1-5)

(E1-5_02/ E1-5_06/ E1-5_07/ E1-5_05/ E1-5_01/ E1-5_15/ E1-5_09)

Indicator	Unit	2019	2020	2021	2022	2023	2024
Total fossil energy consumption	**MWh**	**91,510**	**76,030**	**115,862**	**54,905**	**150,763**	**108,693**
Fuel consumption for renewable sources, including biomass	MWh	0	0	0	0	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	83,785	91,245	51,283	157,841	53,841	89,141
Total renewable energy consumption	**MWh**	**83,785**	**91,245**	**51,283**	**157,841**	**53,841**	**89,141**
Total energy consumption	**MWh**	**175,296**	**167,275**	**167,145**	**212,746**	**204,603**	**197,834**
Fossil sources	%	52%	45%	69%	26%	74%	55%
Renewable sources	%	48%	55%	31%	74%	26%	45%

Accounting principles

(E1-5_02/ E1-5_06/ E1-5_07/ E1-5_05/ E1-5_01/ E1-5_15/ E1-5_09)

Total energy

Total energy consumption within NOS's operations across all business segments. Includes:

i) Fuels

- Fleet: Diesel and gasoline consumed by the company's fleet (passenger and light commercial vehicles).

- Facilities: Natural gas used for heating in one building; diesel consumed in backup generators at buildings and technical infrastructure.

ii) Electricity

- Purchased electricity: Consumed by electrified vehicles in the company's fleet, buildings, mobile and fixed telecommunications network infrastructure, data centres, company-owned stores, and cinema theatres.

- Generated electricity: Renewable micro-generation (solar photovoltaic and wind power) for self-consumption at a number of sites within the mobile and fixed network.

iii) Thermal energy

- Purchased thermal energy: Heating and cooling acquired from third parties for consumption in buildings and cinema theatres.

- Generated thermal energy: Hot water produced via a solar thermal system for self-consumption in one building.

Total renewable energy

i) Fuels: There is no consumption of renewable fuels. All fuel (diesel, gasoline, and natural gas) consumed in the fleet and facilities is classified as fossil fuel. The renewable fraction from biofuel blending in commercial road fuel (biodiesel in diesel, bioethanol in gasoline) is not disaggregated as it is immaterial and does not result from a NOS management decision.

ii) Electricity:

- Purchased electricity: In 2024, this corresponds exclusively to the renewable fraction in the energy mix of purchased electricity , based on information published by each supplier, proportional to the volume supplied and the contracted electricity products. Data from the four most recent quarters published by each supplier is used.

- Generated electricity: All electricity generated at NOS sites is renewable (solar photovoltaic and wind power at selected mobile and fixed network sites).

iii) Thermal energy:

- Purchased thermal energy: All thermal energy purchased from third parties is fossil-based (produced in natural gas cogeneration and trigeneration facilities).

- Generated thermal energy: All thermal energy generated at NOS sites is renewable (hot water produced via solar thermal panels in one building).

Total fossil energy

Total fossil energy = Total energy - Total renewable energy.

1.3.2.1.7 Gross GHG emissions for scopes 1, 2, and 3, and total GHG emissions (E1-6)

(E1-6_07 / E1-6_09 / E1-6_10 / E1-6_11 / E1-6_12 / E1-6_13 / E1-6_25 / E1-6_30 / E1-6_31)

		2019	2020	2021	2022	2023	2024	Δ n-1 (%)	Δ n base (%)
Scope 1 - Direct emissions	**t CO2e**	**7,320**	**3,569**	**3,514**	**4,421**	**4,545**	**3,988**	**-12%**	**-46%**
Fuel consumption - fleet	t CO2e	4,571	3,017	3,031	3,584	3,675	3,348	-9%	-27%
Fuel consumption - facilities	t CO2e	119	85	94	99	94	70	-25%	-41%
Fluorinated gas leakage	t CO2e	2,630	467	389	738	777	570	-27%	-78%
Scope 2 - Indirect energy emissions (Market-based method)	**t CO2e**	**43,064**	**30,929**	**35,630**	**11,471**	**47,686**	**35,766**	**-25%**	**-17%**
Scope 2 - Indirect energy emissions (Location-based method)	*t CO2e*	*48,126*	*39,298*	*31,646*	*34,017*	*32,966*	*22,266*	-32%	-54%
Electricity consumption (Market-based method)	t CO2e	42,083	30,226	34,856	10,725	46,969	35,051	-25%	-17%
Electricity consumption (Location-based method)	t CO2e	47,146	38,595	30,872	33,272	32,249	21,551	-33%	-54%
Thermal energy consumption	t CO2e	980	703	774	746	717	716	0%	-27%
Scope 3 - Other indirect emissions	**t CO2e**	**310,880**	**261,085**	**265,179**	**237,023**	**191,033**	**169,411**	**-11%**	**-46%**
C1 - Purchased goods and services	t CO2e	65,457	55,481	63,371	57,371	54,618	57,525	5%	-12%
C2 - Capital goods	t CO2e	78,422	88,899	99,383	100,232	62,854	50,983	-19%	-35%
C3 - Energy, not accounted for in Scope 1 and 2	t CO2e	11,815	10,027	12,315	12,751	12,158	12,463	3%	5%
C4/C9 - Subcontracted logistics and transport for multi-operator	t CO2e	338	310	334	321	284	306	8%	-9%
C5 - Treatment of waste from operations	t CO2e	169	109	81	93	92	156	70%	-8%
C6 - Business travel	t CO2e	733	153	39	413	874	650	-26%	-11%
C7 - Employee commuting	t CO2e	1,181	429	164	213	168	256	53%	-78%
C8 - Equipment in third-party facilities	t CO2e	7,110	5,628	4,888	4,245	6,071	4,693	-23%	-34%
C11 - Use of sold products	t CO2e	142,905	97,579	82,844	58,053	51,775	41,347	-20%	-71%
C12 - End-of-life treatment of products and packaging	t CO2e	137	203	225	311	308	246	-20%	80%
C14 - Franchise stores	t CO2e	386	233	171	138	140	88	-37%	-77%
C15 - Investment in associates and joint ventures	t CO2e	2,226	2,034	1,364	2,884	1,692	696	-59%	-69%
Total Scope 1 + Scope 2 (Market-based method)	**t CO2e**	**50,383**	**34,499**	**39,144**	**15,892**	**52,231**	**39,754**	**-24%**	**-21%**
Total Scope 1 + 2 + 3 (Market-based method)	**t CO2e**	**361,263**	**295,583**	**304,324**	**252,915**	**243,264**	**209,165**	**-14%**	**-42%**
Total Scope 1 + Scope 2 (Location-based method)	t CO2e	55,446	42,867	35,161	38,438	37,511	26,254	-30%	-53%
Total Scope 1 + 2 + 3 (Location-based method)	t CO2e	366,326	303,952	300,340	275,461	228,544	195,665	-14%	-47%
% of Scope 3 GHG emissions calculated with primary data	%	51%	42%	37%	32%	43%	43%		
Total Scope 1 + 2 + 3 per revenue (Market-based method)	**t CO2e/€**	**0.000248**	**0.000216**	**0.000213**	**0.000166**	**0.000152**	**0.000123**	**-19%**	**-50%**
Total Scope 1 + 2 + 3 per revenue (Location-based method)	t CO2e/€	0.000251	0.000222	0.000210	0.000181	0.000143	0.000115	-19%	-54%

Accounting Principles

(E1-6_15 / E1-6_16 / E1-6_14 / E1-6_29 / E1-6_26 / E1-6_27 / E1-6_25 / E1-6_32)

Methodological framework

NOS's GHG emissions are accounted for in accordance with the methodology outlined in The GHG Protocol Corporate Accounting and Reporting Standard - Revised Edition (2004), complemented by the guidelines from The GHG Protocol Scope 2 Guidance (2015) for Scope 2 emissions accounting, and The GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (2011) for Scope 3 emissions accounting. The calculation is supported by an internally developed tool, tailored to reflect NOS's operational reality and value chain (both upstream and downstream).

The financial control approach is used for consolidation, as defined by The GHG Protocol, to ensure alignment between GHG emissions disclosures and financial disclosures. NOS has no financial or operational control over any activity or entity excluded from the consolidation perimeter, including associated companies or joint ventures.

The GHGs included are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases (hydrofluorocarbons - HFCs, perfluorocarbons - PFCs, sulfur hexafluoride - SF_6; nitrogen trifluoride - NF_3). Results are converted into carbon dioxide equivalent (CO_2e) using the Global Warming Potential (GWP) values used in the most recent edition of the Portuguese National Emissions Inventory available at the time of report preparation. In line with this principle, from 2023 onwards, GWP values published in the Intergovernmental Panel on Climate Change Fifth Assessment Report (AR5) have been adopted. Previous years use GWP values from the Fourth Assessment Report (AR4).

GHG emissions from NOS Madeira and NOS Açores, where operational data is not available, are estimated based on the respective number of customers. These emissions are estimated to represent less than 1% of total corporate emissions.

There are no biogenic emissions associated with NOS's activities, either in Scope 1 or Scope 2.

There were no significant changes to accounting principles in the reporting year.

GHG intensity ratios are calculated using NOS's consolidated revenue.

Scope 1 emissions

Scope 1 emissions correspond to total direct emissions that occur in sources owned or controlled by NOS. These include emissions from fixed and mobile combustion of fossil fuels and fugitive emissions from refrigerant gases used in equipment:

i) Fossil fuels - Emissions are calculated based on fuel consumption and nationally representative emission factors. For road diesel and gasoline, the conversion factor considers the biofuel content (biodiesel and bioethanol, respectively) in fuel sold in Portugal.

ii) Fluorinated gases – Emissions are calculated by applying gas-specific GWP values to the quantities emitted. It is assumed that the amount emitted equals the amount consumed for leakage replenishment.

Scope 2 emissions

Scope 2 emissions correspond to total indirect emissions associated with the generation of purchased energy that is consumed at NOS facilities and equipment. These include emissions from purchased electricity, heating, and cooling:

i) Electricity - Emissions are calculated based on metered energy consumption. The location-based method uses the average carbon intensity factor of electricity in the Portuguese grid, based on the latest data published by the European Environment Agency (EEA proxy for year n-1 electricity production). The market-based method uses the supplier-specific emission factors, based on the most recent available data at the time (for year n-1).

ii) Thermal energy – Emissions are calculated based on metered energy consumption (heating and cooling). The calculation applies the emission factor specific to one of the two thermal energy suppliers, which is considered representative of the total supply due to the similarity of fuel (natural gas) and cogeneration technology used.

Scope 3 emissions

Scope 3 emissions correspond to total indirect emissions associated with third-party activities in NOS's value chain, both upstream and downstream. The applicable categories—identified based on NOS's value chain characteristics, volume of emissions, business criticality, and relevance to external stakeholders—are as follows:

i) Purchased goods and services (Category 1) - Emissions from raw material extraction, production, and transport of goods and services purchased during the reporting year. Different approaches are used depending on data availability:

- Physical approach, using primary and secondary data – For mobile customer equipment (mobile phones), Life Cycle Assessments (LCAs) specific to the purchased models or representative of the equipment type are used.

- Hybrid approach – For services from other telecom operators, an emission intensity ratio (Scope 1 & 2 per €) is used, based on publicly available data from a representative group of operators, updated annually using Portugal's Consumer Price Index (INE data).

- Financial approach – For all other purchased goods and services, sectoral emission intensity ratios from Environmentally Extended Input-Output (EEIO) tables are used, updated annually with Portugal's Consumer Price Index (INE data).

ii) Capital goods (Category 2) - Emissions from raw material extraction, production, and transport of capital goods purchased during the reporting year. Different approaches are used based on data availability:

- Physical approach, using primary and secondary data – For fixed customer equipment (TV set-top boxes, routers, televisions), LCAs specific to purchased models or representative of the equipment type are used.

- Financial approach – For all other capital goods, sectoral EEIO emission intensity ratios are used, updated annually Portugal's Consumer Price Index (INE data).

iii) Fuel- and energy-related emissions not included in Scope 1 & 2 (Category 3) – Emissions from fuel extraction, refining, and transportation for fossil fuels, electricity, and thermal energy consumed, as well as grid transmission and distribution losses. Reference LCA emission factors and national T&D loss data are used.

iv) Upstream and downstream logistics (Categories 4 & 9) – Emissions from outsourced logistics and distribution. This includes emissions from electricity consumption at the logistics centre and transportation of customer equipment to retail stores and customer premises (both direct and reverse logistics). It accounts for transportation paid by NOS (Category 4) as well as transportation paid by customers and partners (Category 9).

Upstream transportation paid by suppliers is accounted for under Categories 1 and 2. cCalculation is based on NOS logistics operation data (transported weights, distances travelled, and vehicle type) and reference emission factors per vehicle type.

v) Waste generated in operations (Category 5) – Emissions from the disposal and treatment of waste and wastewater from NOS operations. Reference Portuguese emission factors are used, excluding emissions from recycling and energy recovery, which are allocated to the recycling and energy sectors. Transport emissions to treatment facilities are not included.

vi) Business travel (Category 6) – Emissions from business travel by employees in third-party vehicles (airplanes, trains, taxis). Calculation uses travel distances, number of passengers, and emission factors. Emissions from air travel include the Radiative Forcing Index.

vi) Employee commuting (Category 7) – Emissions from employee home-work-home commutes in non-company vehicles. Data is collected via employee mobility surveys and matched with reference transportation emission factors.

vii) Energy consumption in third-party facilities (Category 8) – Emissions from electricity consumption by company equipment in third-party facilities (shared sites owned by other operators, leased locations, and housed equipment). Calculation uses electricity consumption estimates based on similar equipment and the location-based emission factor for electricity in Portugal.

viii) Processing of sold products (Category 10) - Not applicable. The products sold by NOS (customer equipment for mobile and fixed telecommunications) are final products, not subject to further processing.

ix) Use of sold products (Category 11) – Emissions from electricity consumption over the entire lifetime of customer equipment in the mobile and fixed segments, sold or installed by the company during the reporting year. Calculation uses representative data on energy consumption, product lifespan, logistics process, and usage patterns of the equipment sold each year, as well as the location-based emission factor for electricity in Portugal. It does not include electricity consumption from customer-owned equipment used to access NOS services but not sold or installed by the company.

x) End-of-life treatment of sold products and packaging (Category 12) – Emissions from waste treatment at the end of life for customer equipment sold or installed during the reporting year, as well as its packaging. Calculation considers recovery rates in Portugal for electrical and electronic equipment (Category 6) and packaging materials, along with reference emission factors. Emissions from recycling and energy recovery operations are excluded, as they are allocated to the recycling and energy sectors, respectively.

xi) Category 13 (Leasing of assets to third parties) - Not applicable. NOS does not lease assets to third parties.

xii) Franchised stores (Category 14) – Emissions from electricity consumption in stores operated by third parties under a franchising model. Calculation uses consumption estimates, based on the average consumption per area of NOS-owned stores and the total area of the franchised store network, along with the location-based emission factor for electricity in Portugal.

xiii) Investments (Category 15) – Scope 1 and 2 emissions, calculated based on the percentage of capital held in associated companies and joint ventures that are not fully consolidated under the integral method. Calculation is based on emission ratios per € of NOS revenue:

- Investments in the telecommunications sector – Uses NOS operation's emissions ratio (total Scope 1 and 2 per €).

- Other investments – Uses the emissions ratio of NOS support activities (Scope 1 and 2 from buildings and fleet per €). These investments are primarily back-office activities.

- Associated companies and joint ventures where NOS is the largest client are excluded, as the emissions related to the procurement of their goods and services are already accounted for under Categories 1 and 2.

For all Scope 3 categories, NOS applies the minimum reporting boundary defined by the GHG Protocol Corporate Value Chain (Scope 3) Standard.

Emission intensity

Emission intensity is calculated as the ratio between total emissions (Scope 1, 2, and 3) and NOS' consolidated revenue, as disclosed in Note 32 of the Consolidated Financial Statements.

Mandatory disclosure format

(AR48)

		2019 [base year]	2020	2021	2022	2023 [comparative]	2024	Δ 2024 vs 2023 (%)	Target 2030 [1]	2025	Δ 2024 vs base year (%)
Scope 1 GHG Emissions											
Gross Scope 1 GHG emissions	t CO2e	7,320				4,545	3,988	-12%			
Scope 1 GHG emissions covered by regulated emissions trading systems	%	0%				0%	0%				
Scope 2 GHG Emissions									5,038		-21%
Gross Scope 2 GHG emissions - Location-based method	t CO2e	48,126				32,966	22,266	-32%			
Gross Scope 2 GHG emissions - Market-based method	t CO2e	43,064				47,686	35,766	-25%			
Scope 3 GHG Emissions											
C1 - Purchased goods and services	t CO2e	65,457				54,618	57,525	5%			
C2 - Capital goods	t CO2e	78,422				62,854	50,983	-19%			
C3 - Energy, not accounted for in Scope 1 and 2	t CO2e	11,815				12,158	12,463	3%			
C4/C9 - Subcontracted logistics and multi-operator retail transport	t CO2e	338				284	306	8%			
C5 - Treatment of waste from operations	t CO2e	169				92	156	70%			
C6 - Business travel	t CO2e	733				874	650	-26%			
C7 - Employee commuting	t CO2e	1,181				168	256	53%	217,616		-46%
C8 - Equipment at third-party facilities	t CO2e	7,110				6,071	4,693	-23%			
C11 - Use of sold products	t CO2e	142,905				51,775	41,347	-20%			
C12 - End-of-life treatment of products and packaging	t CO2e	137				308	246	-20%			
C14 - Franchised stores	t CO2e	386				140	88	-37%			
C15 - Investments in associated companies and joint ventures	t CO2e	2,226				1,692	696	-59%			
Total GHG Emissions											
Total GHG emissions - Location-based method	t CO2e	366,326				228,544	195,665	-14%			
Total GHG emissions - Market-based method	t CO2e	361,263				243,264	209,165	-14%			

* NOS has a Science-Based Target (SBT) for combined Scope 1 and 2 emissions, without differentiated targets for each scope. The SBT for Scope 3 encompasses all emission categories within this scope.



1.3.2.2 ESRS E5 – Resource use and circular economy

1.3.2.2.1 Management of impacts, risks, and opportunities (IRO-1)

(E5.IRO-1_01 / E5.IRO-1_02) The identification of impacts, risks, and opportunities related to resource use and circular economy is based on mapping the NOS value chain:

- Own operations: The company assessed its main physical assets (telecommunications network and other technical infrastructure, logistics centre, back-office buildings, retail network, and cinema theatres) as well as the activities associated with these assets. NOS continuously monitors: material consumption at its logistics centre; the level of digitalisation of invoicing processes (for both suppliers and customers) and cinema ticketing; the production and routing of waste generated by its operations to licensed operators; and the sale of network components with reuse potential in secondary markets.

- Upstream value chain: The most relevant product and service supplies from a circularity perspective (network equipment, customer equipment, and materials used in the logistics process) have been identified. The company has Life Cycle Assessment (LCA) results for most of the fixed customer equipment models it uses (TV set-top boxes and routers) and for an increasing percentage of mobile customer equipment (mobile phones). For fixed equipment, NOS also engages with manufacturers to reduce material use and increase the incorporation of recycled materials (e.g., recycled plastic in TV set-top boxes, routers, and remote controls).

- Downstream value chain: The use and end-of-life of customer equipment have been assessed. NOS continuously monitors: the volumes and characteristics of mobile and fixed equipment provided to customers; the performance of its own take-back, refurbishment, and resale systems (already implemented for fixed equipment and being expanded for mobile equipment); and its contribution to integrated management systems for electrical and electronic equipment placed on the market.

A more detailed analysis is underway, covering each of NOS' business processes, to identify: i) Inputs and outputs of material resources; ii) Improvement opportunities related to reducing consumption, circular product and process design, using recycled and/or reused materials, and aligning waste management practices with the waste hierarchy. This analysis will serve as the foundation for defining NOS' circularity strategy, including its action plan, resource allocation, new performance targets, and monitoring metrics.

The full description of the impact, risk, and opportunity identification process related to resource use and the circular economy, within the double materiality assessment, can be found in section "1.3.1.11. Double materiality assessment process (IRO-1)".

1.3.2.2.2 Policies (E5-1)

(E5.MDR-P 01_06) The main corporate policies related to resource use and the circular economy are:

- NOS Sustainability Policy
- Sustainability Requirements for Suppliers and Partners

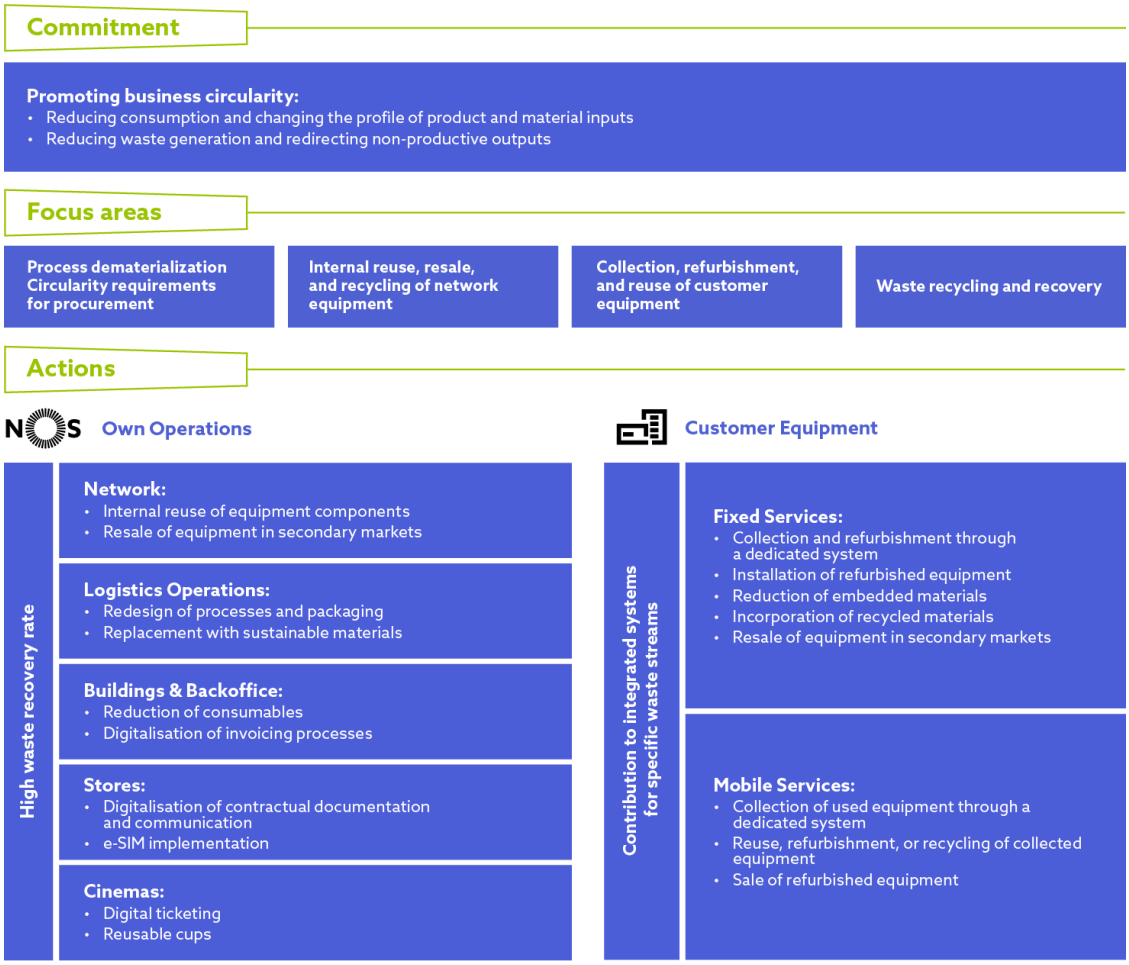
A detailed description of these policies can be found in section "3.1.12. Policies (MDR-P)".

The relationship between these policies and resource use and the circular economy is presented in the following table:

Topic		Approach to the topic in the policy
NOS Sustainability Policy	Network and customer equipment	In the environmental pillar (In the Name of the Planet), the policy identifies reuse, resale, or recycling of network and customer equipment as a key principle to promote circularity in NOS's business and positively influence the entire value chain.
	Other material inputs and outputs	In the environmental pillar (In the Name of the Planet), the policy identifies proper waste management as a key principle to promote circularity in NOS's business and positively influence the entire value chain.
NOS Sustainability Requirements for Suppliers and Partners	Network and customer equipment	The requirements mandate that all suppliers and partners collaborate to improve the environmental performance of NOS's products and services and provide information on their own environmental goals and performance.
	Other material inputs and outputs	The requirements state that suppliers and partners must ensure that the waste generated at NOS's facilities as a result of their services is sent to a licensed and environmentally appropriate final destination. Additionally, whenever applicable, the Waste Accompanying Form (e-GAR) related to waste transportation/disposal must be made available to NOS upon request.

1.3.2.2.3 Actions and resources related to resource use and circular economy (E5-2)

(E5.MDR-A_01-12) Our circularity commitment covers the consumption of products and materials and the generation of waste in our own operations, as well as the equipment we provide to our customers, in both the fixed and mobile segments.



In 2024, we completed an extensive mapping and evaluation process of initiatives already implemented within the organization, identified new opportunities, and defined intervention priorities, which will be reflected in the new NOS circularity strategy, to be launched in 2025.

Customer Equipment

To minimize the environmental impact of the production and end-of-life of the equipment we provide to our customers, we act on three fronts: reducing the amount of material used and modifying its profile; implementing take-back, refurbishment, and reuse schemes; and contributing to integrated systems that collect and recycle equipment and packaging.

Material reduction and sustainability

The latest models of our cable TV set-top box and router are already manufactured with 100% recycled plastic.

We have replaced virgin plastic with recycled plastic in one of our satellite TV box models, in all remote controls for cable boxes, and their packaging, while also progressively increasing the use of digital SIM cards (e-SIMs).

Take-back and reuse of fixed equipment

Equipment used by our fixed service customers (TV boxes and routers) is collected through an in-house reverse logistics operation, evaluated, and, whenever technically viable, refurbished and reused.

The targets for the reuse rate of collected equipment are set considering the technological evolution of the devices and their market introduction plan.

In 2025, we plan to expand the operation to include new types of customer equipment, such as alarms and home automation devices.

Take-back and reuse of mobile equipment

In 2024, we completely overhauled the used mobile phone take-back process—which had been suspended for a few months while we tested the new model—and initiated the activation of trade-in circuits developed in collaboration with a new partner at the end of the year.

All returned devices are refurbished and reused, or, when technically unviable, sent for recycling.

With this new operation, we aim to increase the take-back levels of mobile devices, which are still at an early stage, targeting a 20% take-back rate, as defined under NOS's participation in the GSMA. We also plan to strengthen the sale of refurbished devices, ensuring quality and reliability under the Garantidos NOS program.

Contribution to Integrated Systems

NOS contributes to integrated waste systems, through which we finance collection and recycling networks for all devices placed on the market. The waste from the respective packaging is also sent for recycling through the integrated system managed by Sociedade Ponto Verde.

Technical Infrastructure

All equipment removed from our telecommunications network is evaluated: a portion is reintroduced into operations after refurbishment or internally reused for spare parts; legacy equipment, featuring older technologies but with potential for reuse in other networks, is sold in secondary markets; remaining equipment is sent for recycling.

We have also implemented processes to optimize the use of consumables, particularly reducing the amount of cable used in new installations.

Logistics operations

In 2024, we continued redefining our shipping, internal operations, and packaging processes, aiming to reduce material consumption and replace materials with recycled and/or sustainably certified versions.

Additionally, we are evaluating the widespread use of returnable packaging for internal equipment circulation.

Buildings

Our back-office buildings have waste sorting and selective collection circuits. To reduce single-use materials, we have provided employees with reusable cups, aiming to progressively phase out disposable coffee cups.

Retail Stores

In our store network, contracting processes—previously carried out on paper—are now fully digital.

In 2024, we continued efforts to reduce paper consumption, providing training for employees and streamlining procurement processes. Additionally, we significantly reduced the production of paper brochures for in-store distribution.

In 2025, we will launch a new initiative to minimize uniform-related waste, focusing on the collection and recycling of store uniforms.

Cinemas

In 2024, we launched a pilot project for reusable cups, which will be widely implemented in 2025, encouraging waste reduction and fostering active audience participation.

Billing and ticketing processes

We are digitizing customer and supplier invoicing processes and gradually increasing the sale of cinema tickets in fully digital formats.

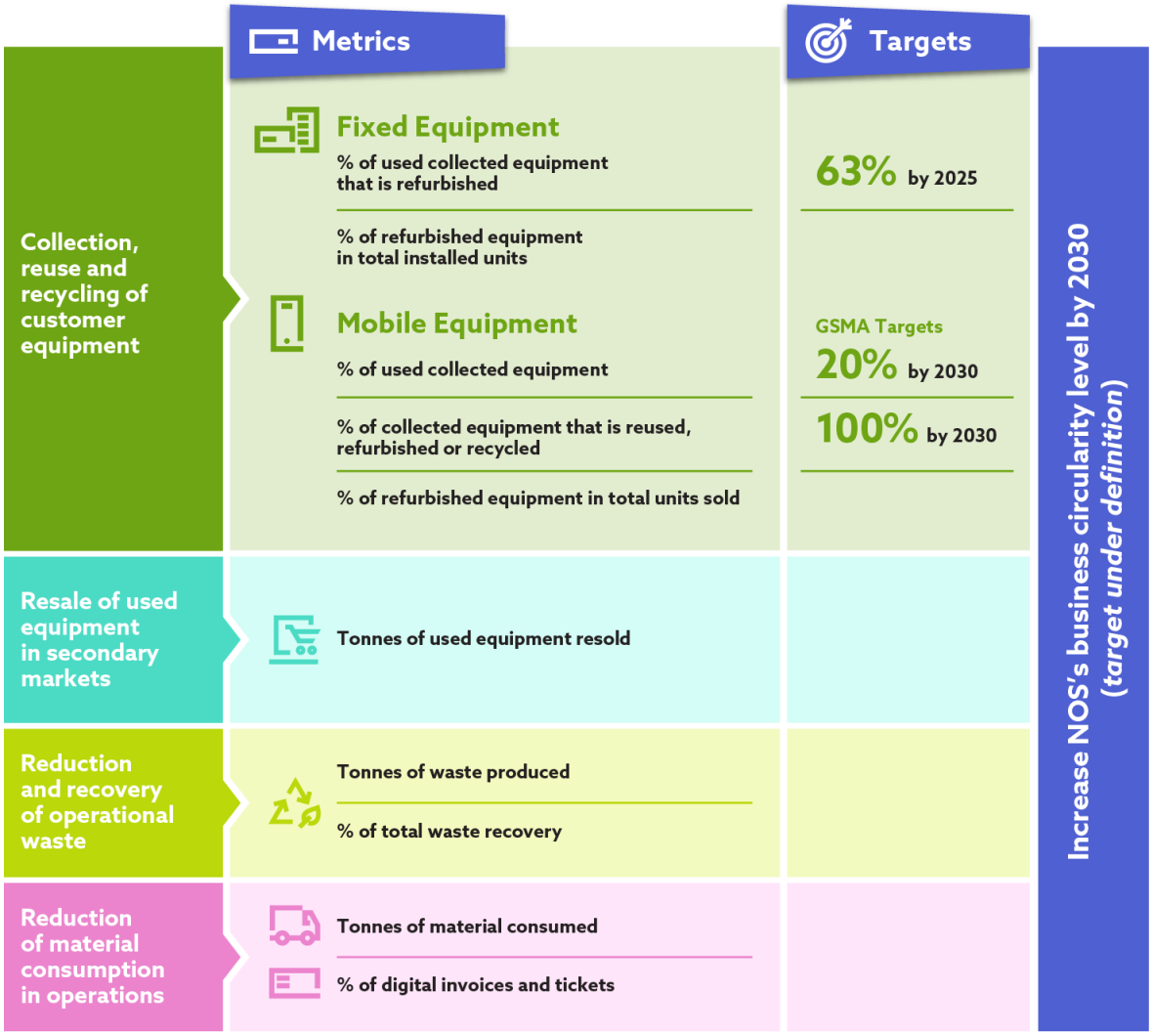
Waste management

Across all our facilities, we have implemented selective waste collection circuits to maximize waste recovery and minimize landfill disposal. Waste is processed through licensed waste management operators, supplemented—where applicable—by municipal waste collection services for small quantities of urban-equivalent waste.

Metrics and targets

1.3.2.2.4 Targets and metrics related to resource use and circular economy (E5-3)

(E5.MDR-T_01-13 / E5-3_01/ E5-3_02 / E5-3_03 / E5-3_04 / E5-3_06 / E5-3_07 / E5-3_08 / E5-3_09 / E5-3_13)



Fixed customer equipment

Customer Fixed Equipment Set-Top Boxes and Routers	2023	2024
Refurbishment rate of used collected equipment	62%	59%
Refurbished equipment as a percentage of total installed units	54%	53%

The slight reduction in refurbishment rates for returned equipment in 2024 was primarily due to the technology renewal cycle and an increased reliance on new equipment.

Mobile customer equipment

Customer Mobile Equipment – Mobile Phones	2023	2024
Used equipment collection rate	0.07%	0.05%
Recovery rate of collected used equipment*	100%	100%
Refurbished equipment as a percentage of total units sold	0.4%	0.3%

* Reuse, refurbishment or recycling.

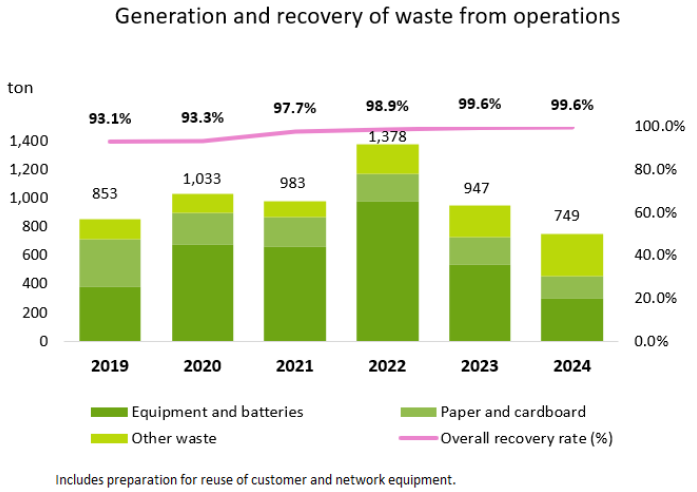
In 2025, with the full implementation of new trade-in circuits, we expect a significant increase in mobile equipment take-back and recovery levels, which remain very low. Our goal is to reach a 20% take-back rate and strengthen the resale of refurbished devices.

All returned devices were processed for reuse (either with or without prior refurbishment) or recycled by licensed entities, through a dedicated scheme managed by a specialized partner.

Resale of used equipment in secondary markets

Resale of used equipment in secondary markets	2023	2024
Quantity of resold equipment (t)	181	170

Waste from operations

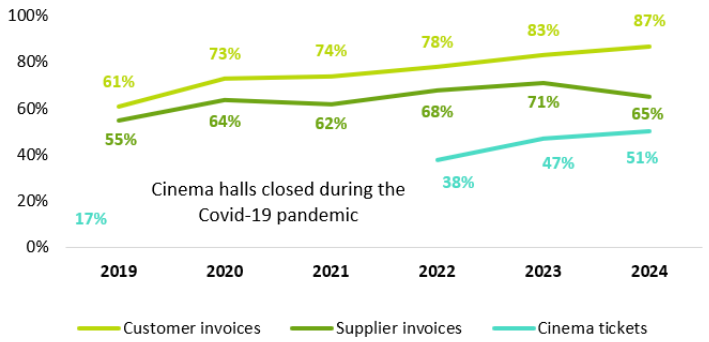


Includes preparation for reuse of customer and network equipment.

Material consumption in operations

Material consumption – Logistics operations	2023	2024
Quantity Consumed (t)	258	214
Recycled Materials as a Percentage of Total Consumption	92%	94%

Digitalisation of invoicing and ticketing processes



Accounting principles

(E5.MDR-T_01-13 / E5-3_13 / E5-3_01 / E5-3_02 / E5-3_03 / E5-3_04 / E5-3_06 / E5-3_07 / E5-3_08 / E5-3_09)

Refurbishment of fixed customer equipment

The target applies to fixed customer equipment (residential and business segments) collected from customer premises or returned through various commercial channels.

The monitoring metric (KPI) is the ratio (expressed as %) between the number of devices refurbished through our own circuit and the total number of devices collected.

Includes: TV set-top boxes and routers.

This target aims to increase circular material usage rates, minimize primary raw material consumption, and enhance waste management, aligning with Level 2 of the waste hierarchy (preparation for reuse).

Use of refurbished fixed customer equipment

The monitoring metric (KPI) is the ratio (expressed as %) between the number of refurbished devices and the total number of fixed devices (new and refurbished) installed in customers premises (residential and business segments) during the reporting year.

Includes: TV set-top boxes and routers.

Mobile customer equipment take-back

The target applies to new mobile devices sold by NOS to customers (business and residential segments).

The monitoring metric (KPI) is the ratio (expressed as %) between the number of devices collected by NOS through its own take-back circuits and the total number of new devices sold.

Includes: mobile terminals (smartphones and feature phones).

The target and monitoring metric were defined by GSMA, the international mobile telecommunications industry association, and adopted in 2023 by 12 international telecom operators, including NOS.

This target aims to increase circular material usage rates, minimize primary raw material consumption, and enhance waste management, aligning with Level 2 of the waste hierarchy (preparation for reuse).

Recovery of mobile customer equipment

The target applies to mobile customer equipment (business and residential segments) collected by NOS through its own take-back circuits.

The monitoring metric (KPI) is the ratio (expressed as %) between the number of devices reused, repaired, or sent to licensed recycling operators and the total number of devices collected by NOS through its own circuits.

Includes: mobile terminals (smartphones and feature phones).

The target and monitoring metric were defined by GSMA and adopted in 2023 by 12 international telecom operators, including NOS.

This target aims to increase circular material usage rates, minimize primary raw material consumption, and enhance waste management, aligning with Level 2 (preparation for reuse) and Level 3 (recycling) of the waste hierarchy.

Use of refurbished mobile customer equipment

The monitoring metric (KPI) is the ratio (expressed as %) between the number of refurbished devices and the total number of devices (new and refurbished) sold to mobile customers (residential and business segments) during the reporting year.

Includes: mobile terminals (smartphones and feature phones).

Resale of used equipment in secondary markets

The monitoring metric (KPI) is the total weight (expressed in tons) of used network and customer equipment resold in secondary markets for third-party reuse.

Includes: network equipment and components, mobile and fixed customer equipment, and accessories.

Only sales in secondary markets outside Portugal are accounted for, based on data from the Transboundary Shipment of Waste process. Sales for reuse through domestic entities are excluded, as they are accounted for as multi-material recycling due to the unavailability of disaggregated data.

Total waste production in own operation

The monitoring metric (KPI) is the total weight (expressed in tons) of waste produced in own operation, broken down into major categories (equipment and batteries; paper and cardboard; other waste). Waste is defined as any outflow of material resources from NOS facilities, except those classified as products (customer equipment in fixed and mobile segments).

Includes: Used equipment resold in secondary markets through foreign entities; waste sent to waste management operators in Portugal (including resale of used equipment for reuse).

Excludes: Urban-equivalent waste handled through municipal waste systems.

Global waste recovery rate in own operations

The monitoring metric (KPI) is the ratio (expressed in tons) between waste from own operation directed to reuse, multi-material recycling, or composting and the total waste produced in own operation.

Includes: used equipment resold in secondary markets through foreign entities; waste sent to waste management operators in Portugal (including resale of used equipment for reuse).

Excludes: urban-equivalent waste handled through municipal waste systems.

Material consumption in own operation

The monitoring metric (KPI) is the total weight (expressed in tons) of materials consumed in own operation that are not considered products.

Includes: material consumption in logistics operations (warehouse consumables, shipping documents and boxes, production components such as cases and envelopes).

Excludes (due to incomplete information): product packaging; materials and consumables used in technical infrastructure operations, retail stores, back-office buildings, and cinema theatres.

Digitalization of billing and ticketing processes

The metric consists of the ratios (expressed in %) between the number of supplier invoices, customer invoices, and cinema tickets issued exclusively through digital channels and the total number of respective documents.

Includes: i) Customer invoices – only for integrated services customers; ii) Cinema tickets – tickets sold through all digital channels (app, website, and kiosk/self-vending).

Business Circularity

The target is under review, and no specific monitoring indicator is currently defined. The detailed monitoring methodology is still being developed.

As part of NOS' sustainability strategy review for 2025-2030, the target year has been adjusted to 2030 to align with other energy and climate objectives.



1.3.2.2.5 Resource inputs (E5-4)

Material resource input flows

(E5-4_01)

Products

Customer equipment: Electronic devices provided to customers in the mobile and fixed segments (mobile phones, TV set-top boxes, routers, TVs, chargers, power adapters, accessories, PBX systems and other enterprise customer equipment, tablets, smartwatches) and their respective packaging.

These devices are not consumed or transformed between their entry and exit from the company's facilities.

Materials

Logistics operations: Paper, cardboard, plastic, and other materials used in the logistics process (boxes, packing material, plastic film, documents).

Technical infrastructure: Cables and batteries.

Support activities (back-office buildings and stores): Writing and printing paper, cardboard cups, promotional materials, uniforms, food items.

Cinemas: Paper for ticketing, corn, cardboard food packaging (popcorn buckets and cups).

Products and materials used

(E5-4_02)

Indicator	Unit	2023	2024
Products used	**t**	**545**	**557**
Mobile phones	t	37	41
TV set-top-boxes	t	197	191
Routers	t	276	299
TVs	t	36	27
Technical materials used	**t**	**258**	**214**
Non-biological	t	12	13
Plastic	t	11	7
Other materials	t	1	6
Biological	t	246	201
Paper	t	45	27
Cardboard	t	201	174

Use of secondary (used or recycled) products and materials

(E5-4_04 / E5-4_05)

Indicator	Unit	2023	2024
Components, products and secondary	**t**	**237**	**201**
Refurbished mobile phones	t	0	0
Refurbished TV set-top boxes	t	133	118
Refurbished routers	t	94	122
Refurbished TVs	t	0	0
Recycled paper	t	37	22
Recycled cardboard	t	200	173
Recycled plastic	t	0	0
Other recycled materials	t	0	5
Percentage of components, products and secondary materials used	**%**	**30%**	**26%**

Accounting principles

(E5-4_06)

Products

Products classified as incoming resources include telecommunications electronic equipment intended for customer distribution. These products are either purchased new or sourced through NOS's internal take-back and refurbishment operations for reuse. They are not consumed or transformed between their entry into and exit from NOS facilities.

Includes: mobile phones (new and refurbished); TV set-top boxes (new and refurbished); routers (new and refurbished); TVs (new).

Excludes (due to incomplete data availability): product packaging; chargers, adapters, and accessories; telephone exchanges and other enterprise customer equipment; tablets; smartwatches; alarms and related equipment.

The quantification of volumes (t) is based on the unit weight of each brand/model sold or installed, multiplied by the respective number of units in the reporting year. Stock levels are

assumed to be negligible, meaning that the number of incoming products equals the number of products delivered to customers within the same period.

Materials

Materials classified as incoming resources include materials and consumables used in NOS operations, excluding products.

Includes: logistics operations: warehouse consumables (internal use), shipping materials (boxes and documents), and production components (boxes and envelopes).

Excludes (due to incomplete data availability): technical infrastructure: cables and batteries; back office and stores: writing and printing paper, paper cups, promotional materials, uniforms, food; cinemas: ticketing paper, corn, and popcorn packaging.

The quantification of volumes (t) is based on operational monitoring data, specifically tracking quantities and weights at NOS logistics center.

Secondary products and materials

The following non-virgin material resource inflows (i.e., secondary resources) are considered:

i) Products:

- Refurbished customer equipment (mobile phones, TV set-top boxes, and routers) sourced for customer distribution in mobile and fixed services. 100% of the equipment's weight is accounted for as a secondary product.

- Excludes: Due to incomplete data, the proportion of reused or recycled materials/components in newly purchased customer equipment is not reported.

ii) Materials:

- Recycled materials used in logistics operations (warehouse consumables, shipping materials, and production components).

- Excludes: Due to incomplete data, materials (both virgin and secondary) used in other NOS operations are not accounted for.eas da operação NOS.

1.3.2.2.6 Resource outflows (E5-5)

Durability and repairability of marketed products

(E5-5_02 / E5-5_03)

Indicator	Unit	2023	2024
Durability	**years**		
Mobile phones	years	2.8	2.8
TV set-top-boxes	years	8.0	8.0
Routers	years	6.0	6.0
TVs	years	7.0	7.0
Repairability	**%**		
Mobile phones	%	100%	100%
TV set-top-boxes	%	100%	100%
Routers	%	100%	100%
TVs	%	100%	100%

Recyclable content of products and packaging placed on the market

(E5-5_04 / E5-5_05)

Indicator	Unit	2023	2024
Recyclable content	**%**		
Mobile phones	%	76%	76%
TV set-top boxes	%	-	-
Routers	%	-	-
TVs	%	-	-
Packaging	%	100%	100%

Total waste generated, by type and final destination

(E5-5_12 / E5-5_13 / E5-5_14)

Used electrical and electronic equipment—network equipment, IT systems, customer devices—as well as batteries and packaging materials are the primary waste streams generated in NOS operations.

In 2024, NOS generated a total of 749 tonnes of waste and achieved a global recovery rate of 99.6%, ensuring minimal landfill disposal and maximum material reuse and recycling.

(E5-5_07 / E5-5_08 / E5-5_09 / E5-5_10 / E5-5_11 / E5-5_15)

Indicator	Unit	2019	2020	2021	2022	2023	2024
Waste diverted from disposal - Total	**t**	**794**	**964**	**960**	**1,362**	**944**	**745**
Hazardous waste	t	65	37	48	38	12	6
Preparation for Reuse	t	0	0	0	0	0	0
Recycling	t	65	37	48	38	12	6
Other	t	0	0	0	0	0	0
Non-hazardous waste	t	728	927	912	1,324	931	740
Preparation for Reuse	t	0	414	245	535	181	170
Recycling	t	728	513	667	789	750	570
Other	t	0	0	0	0	0	0
Waste direct to disposal - Total	**t**	**59**	**69**	**23**	**16**	**3**	**3**
Hazardous waste	t	4	0	0	0	3	3
Incineration	t	0	0	0	0	0	0
Landfill	t	4	0	0	0	0	2
Other	t	0	0	0	0	3	1
Non-hazardous waste	t	55	69	23	16	0	0
Incineration	t	16	7	0	0	0	0
Landfill	t	39	62	23	15	0	0
Other	t	0	0	0	0	0	0
Non-recycled waste	t	59	69	23	16	3	3
Non-recycled waste	%	6.9%	6.7%	2.3%	1.1%	0.4%	0.4%



Accounting principles

(E5-5_02)

Durability

The average usage time of equipment sold is estimated by equipment type, acknowledging that actual lifespan may exceed these values:

Mobile phones: Based on manufacturer data and NOS service usage profile monitoring.

TV set-top boxes and routers: Based on manufacturer data and NOS logistics monitoring (refurbishment and dispatch).

TVs: Based on manufacturer data.

(E5-5_03)

Repairability

All equipment sold or provided by NOS is repairable.

(E5-5_04 / E5_05)

Recyclable content of products and packaging placed on the market

Mobile phones: The average recyclability rate is based on Eco Rating evaluations, which is considered a suitable proxy for mobile phones sold during the year.

TV set-top boxes, routers, and TVs: Specific recyclability rate data is not yet available. NOS is evaluating the implementation of a process to systematize this information, to be provided by manufacturers for the set-top boxes, routers, and TVs supplied to customers.

Packaging: The recyclability rate for paper and cardboard packaging (which accounts for 97% of the total) is 100%.

(E5-5_17 / E5-5_14)

Waste generated

All material resource outflows from NOS facilities are considered waste, except for those classified as products (equipment provided to customers in the fixed and mobile segments).

Includes:

i) Preparation for Reuse: Used equipment and materials, not classified as products, sold for reuse by third parties through foreign entities. The quantities are monitored based on information from Transboundary Shipment of Waste Processes.

ii) Recycling, Incineration (with and without energy recovery), Landfill, and Other Final Destinations: All waste generated by NOS operations and directed to licensed waste management operators in Portugal. These quantities also include equipment and materials sold for reuse through national entities, which cannot currently be disaggregated. Quantities are monitored based on Waste Transport Forms (Guias de Acompanhamento de Resíduos - eGARs).

Excludes: waste equivalent to municipal solid waste processed through local municipal collection systems.

Hazardousness, composition, and materials present in waste

The classification of hazardous and non-hazardous waste, as well as its composition and materials, follows the European Waste Catalogue (EWC).

Hazardous waste includes the following categories:

- Waste electrical and electronic equipment (WEEE) containing hazardous substances: EWC code 200135
- Other equipment containing hazardous substances: EWC codes 160211, 160213, 160215
- Batteries and accumulators containing hazardous substances: EWC codes 160601, 200133
- Other hazardous waste: EWC codes 130502, 150202, 170503, 200121

Non-hazardous waste includes the following categories:

- Waste electrical and electronic equipment (WEEE): EWC codes 170411, 200136
- Other equipment: EWC codes 160114, 160216
- Batteries and accumulators: EWC code 160605
- Paper and cardboard: EWC codes 150101, 200101
- Plastics: EWC codes 150102, 200139
- Metals: EWC codes 150104, 160117, 160118, 170405, 170407, 200140
- Glass: EWC codes 150107, 200102
- Wood: EWC code 200138
- Organic waste: EWC codes 200108, 200201

- Mixed (unsorted) waste: EWC codes 200301, 200399
- Other waste: EWC codes 150106, 170107, 170504, 170904, 180104, 180109, 191202, 200102, 200110, 200111, 200132

(E5-5_10 / E5-5_11)

Non-recovered waste

This category includes all hazardous and non-hazardous waste that is not sent for preparation for reuse or multimaterial recycling.



1.3.2.3 Taxonomy

Turning current environmental challenges into opportunities, seeking a fair and inclusive transition to a low-carbon economy that is resilient to climate change, is the driving force behind the European Green Deal. In this transformation scenario, where it is imperative to direct investment towards more sustainable projects and activities, both companies and the financial ecosystem play a vital role.

To this end, the European Commission has approved the EU Taxonomy Regulation, which establishes a classification system for sustainable economic activities, aiming to redirect capital flows towards sustainable activities, thereby contributing to the creation of a facilitating framework for sustainable investment that promotes transparency, consistency, and comparability of information.

According to the EU Taxonomy, based on Regulation (EU) 2020/852 of the European Parliament and of the Council of June 18, 2020, for an activity to be considered sustainable, it must meet the following criteria:

1. **Contribute substantially (SC)** to one or more of the following six environmental objectives defined in the European Taxonomy, in accordance with the respective technical criteria (TC);



2. **Do No Significant Harm** (DNSH) to the remaining environmental objectives;
3. Comply with the **Minimum Safeguards** (MS).

During the 2024 fiscal year, NOS assessed the eligibility of its activities, taking into account the six objectives of the EU Taxonomy. This process, which has been refined since 2021, included a comprehensive analysis of its business units and activities. As a result of the assessment, twelve activities were identified as eligible, associated with the objectives of Climate Change Adaptation, Climate Change Mitigation, and Circular Economy. Additionally, one aligned activity was identified under Climate Change Adaptation.

The table below presents the main performance indicators (KPIs) defined by the EU Taxonomy – Turnover, capital expenditures (CapEx), and operational expenditures (OpEx) – for the eligible activities and the eligible and aligned activities for 2024.

KPI	Total (k)	Proportion of eligible economic activities	Proportion of eligible and aligned economic activities
VN	1 696 263.12 €	7.45%	1.18%
OpEx	101 319.61 €	16.54%	0.00 %
CapEx	446 245.00 €	27.96 %	0.01 %

1. Eligible Activities

To determine eligibility, NOS conducted a detailed analysis of its operations, comparing them with the activities listed by the EU Taxonomy to understand their match. The assessment allowed for the identification of the following activities as eligible:

Code	Activity Name	Description of the Activity for NOS
CCA13.3	Motion picture, video and television programme production, sound recording and music publishing activities	NOS sells exhibition rights and acts as a distributor of films and series, which can be shown in cinemas, television, and its own platforms. NOS invests in the infrastructure (e.g., movie theatres, projectors) and IT software/systems that enable it to offer this service, as well as incurs in maintenance and repair costs to ensure its correct operation. ESRS E1 – Climate Change
CCA8.3	Programming and broadcasting activities	NOS sells exhibition rights and acts as a distributor of films and series on television and streaming platforms. It also offers content in its TV segments, namely from the TV Cine Channel. ESRS E1 – Climate Change
CE4.1	Provision of IT/operational technology solutions based on data	In 2024, NOS invested in various software and information systems for remote monitoring and predictive maintenance. NOS incurs expenses in maintenance and repair to ensure its correct operation. ESRS E5 – Resource Use and Circular Economy
CCM6.5	Transport by motorbikes, passenger cars and light commercial vehicles	During 2024, NOS acquired and leased new M1 and N1 category vehicles, which follow Euro 5 or Euro 6, incurring in maintenance costs with it. ESRS E1 – Climate Change
CCM7.3	Installation, maintenance, and repair of energy efficiency equipment	In 2024, NOS installed free colling, and renewal HVAC equipment to reduce consumption. In addition, it changed the lights placed in stores to more efficient LED lighting. ESRS E1 – Climate Change
CCM7.5	Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling	In 2024, NOS installed timed analogue clocks in stores (building automation and control systems) to reduce continuous nighttime loads and energy consumption. ESRS E1 – Climate Change

Code	Activity Name	Description of the Activity for NOS
	energy performance of buildings	
CCM7.6	Installation, maintenance, and repair of renewable energy technologies	In 2024, NOS increased its own production of photovoltaic solar energy, for self-consumption, with the installation of new photovoltaic solar panels at its facilities. ESRS E1 – Climate Change
CCM8.1	Data processing, hosting, and related activities	NOS has three Data Centres. To ensure its correct operation, it incurs repair and maintenance costs, both preventive and corrective, of the Data Centres and the equipment necessary for their operation. NOS also generates revenue by offering Data Centre and Cloud services to its customers. ESRS E1 – Climate Change
CCM8.2	Data-driven solutions for GHG emissions reductions	In 2024, NOS made investments in the modernization and transformation of the national network to provide national connectivity to the 5G mobile network, as well as incurred costs for its maintenance and repair. In addition, NOS offers services associated with NOS Smart Home, with the aim of identifying and managing power peaks for more efficient assessment and management. In the corporate segment, it also offers solutions that reduce GHG emissions. ESRS E1 – Climate Change
CE5.1	Repair, refurbishment and remanufacturing	NOS repairs equipment to reintegrate them into its systems, maximizing the use of each equipment. To this end, NOS incurs costs directly associated with maintenance and repair. ESRS E5 – Resource Use and Circular Economy
CE5.4	Sale of second-hand goods	NOS sells second-hand equipment in case a fixed equipment can no longer be reintegrated into NOS's systems. ESRS E5 - Resource Use and Circular Economy
CE5.5	Product-as-a-service and other circular use- and result-oriented service models	NOS provides part of the fixed equipment necessary for the development of its activity as an operator to the end customer. This equipment remains a NOS asset during its useful life, being continuously reintegrated into NOS's processes and systems. Within the scope of this activity, only the revenues generated by the rental of boxes and other additional residential equipment (not included in the first contract that is developed with the customer), as well as equipment associated with the services of NOS Alarmes, are considered. ESRS E5 - Resource Use and Circular Economy

1. Aligned activities

Substantial Contribution and Do No Significant Harm

To determine whether the eligible activities are aligned, NOS conducted a compliance analysis with the criteria stipulated by the Regulation. This analysis assessed the substantial contribution of the activities to their respective objectives, in accordance with the technical criteria set out in the EU Taxonomy. Additionally, it verified compliance with the Do No Significant Harm criteria, in relation to the other objectives.

The results of the analysis are presented in the tables below:

CCM8.3. Programming and broadcasting activities

Criteria	Description (not exhaustive)	Alignment Analysis
SC	Development of a Climate Risk and Vulnerability Assessment (CRVA) and development and implementation of a subsequent Adaptation Plan. Technology/product/service/information/practice increases the level of resilience to physical risks or contributes to the climate-related adaptation efforts of other people, nature, assets, and other economic activities.	For a detailed assessment of response to Appendix A see analysis below. In 2024, the content that was shown and distributed in the television segment that refers to the theme of Climate Change was evaluated. Criteria met

CCM13.3. Motion picture, video and television programme production, sound recording and music publishing activities

Criteria	Description (not exhaustive)	Alignment Analysis
SC	Development of an CRVA and development and implementation of a subsequent Adaptation Plan. Technology/product/service/information/practice increases the level of resilience to physical risks or contributes to the climate-related adaptation efforts of other people, nature, assets, and other economic activities.	For a detailed assessment of response to Appendix A see analysis below. Additionally, in 2024, the content shown and distributed in the cinema segment did not address the topic of Climate Change. Criteria met

CE4.1. Provision of IT/OT data-driven solutions

Criteria	Description (not exhaustive)	Alignment Analysis
SC	The Information Technology Solution (ITS) considered for the activity coincides with the categories listed (e.g.: remote monitoring and predictive maintenance), which present the capabilities required by the Taxonomy.	Fourteen remote monitoring and predictive maintenance ITS were identified, of which eleven have the respective capabilities listed in the SC. Criteria met
DNSH – CCA	Development of a Climate Risk and Vulnerability Assessment (CRVA) and development and implementation of a subsequent Adaptation Plan.	For a detailed assessment of response to Appendix A see analysis below. Criteria met
DNSH - WTR	It shall comply with the conditions of Appendix B.	In 2024, NOS considered that there was no negative impact on the conservation of marine waters. However, it was not possible to validate compliance with the other requirements of the EU Taxonomy. Criteria not met
DNSH - PPC	The equipment used complies with the requirements of Directive 2009/125/CE for servers and data storage products and does not contain restricted substances in accordance with Annex II to Directive 2011/65/EU of the European Parliament and of the Council.	In 2024, one of the STIs verifies compliance with the DNSH-PPC. However, it was not possible to collect the information necessary to assess the compliance with the criterion for the remaining STIs. Criteria not met

CE5.1. Repair, refurbishment and remanufacturing

Criteria	Description (not exhaustive)	Alignment Analysis
SC	The activity consists of extending the useful life of the products, being covered by a sales contract. The activity applies a waste management plan.	NOS presents the terms and conditions on the sales invoices of the equipment, and provides additional information online. Applicable terms and conditions follow national law. Waste management is conducted through contracts with certified third parties. For repairs made by external entities, they are certified according to ISO standards and comply with the "Sustainability Requirements for Suppliers and Partners", which are based on national and European legislation, as well as the standards of general international law. Criteria met
DNSH – CCM	The direct GHG emissions of the activity are less than 270g CO2e/kWh.	NOS uses tools that use heat generation in interventions, however it was not possible to collect information that would allow to respond to the criterion. Criteria not met
DNSH – CCA	Development of a Climate Risk and Vulnerability Assessment (CRVA) and development and implementation of a subsequent Adaptation Plan.	For a detailed assessment of response to Appendix A see analysis below. Criteria met
DNSH - WTR	It shall comply with the conditions of Appendix B.	In 2024, it was not possible to obtain a response from the responsible entity regarding the performance of an Environmental Impact Assessment (EIA) that addresses the issue of Water and Marine Resources. Criteria not met
DNSH - PPC	It shall comply with the conditions of Appendix C. The spare parts installed comply with EU rules on the restriction of the use of hazardous substances. For installations falling within the scope of Directive 2017/75/EU, emissions are below the ranges of mission values associated with best available techniques.	NOS, when purchasing equipment, specifies with the supplier that the products must comply with safety standards, including the substances they contain. Criteria met

CE5.4 - Sale of second-hand goods

Criteria	Description (not exhaustive)	Alignment Analysis
SC	It consists of the sale of a second-hand product, used as intended by a customer (natural or legal person). Prior to sale, the product may be cleaned, repaired, refurbished, or remanufactured, and must be covered by a contract of sale. There is a Waste Management Plan inherent to repair, reconditioning and remanufacturing actions.	Currently, NOS does not offer sales contracts in operations with brokers. However, it is rethinking its model for selling second-hand equipment, aiming at its appreciation, which may lead to changes in purchase and sale contracts in the near future. Products sold second-hand in 2024 were not intervened. The equipment is sold on pallets, and it was not possible to obtain all the information necessary to verify compliance with the SC criterion associated with the packaging and respective materials used. Criteria not met
DNSH – CCM	The direct GHG emissions of the activity are less than 270g CO2e /kWh. The activity has a strategy that aims to reduce GHG emissions from transport along the value chain.	In 2024, NOS did not intervene in the equipment sold and the transport of the same was of the buyer's responsibility, so the criteria are not applicable. It was not possible to guarantee compliance with the provisions of the Directive 2009/125/CE. Criteria not met
DNSH – CCA	Development of a Climate Risk and Vulnerability Assessment (CRVA) and development and implementation of a subsequent Adaptation Plan.	For a detailed assessment of response to Appendix A see analysis below. Criteria met
DNSH - WTR	It shall comply with the conditions of Appendix B.	In 2024, it was not possible to obtain a response from the responsible entity regarding the performance of an Environmental Impact Assessment (EIA) that addresses the issue of Water and Marine Resources. Criteria not met
DNSH - PPC	It shall comply with the conditions of Appendix C.	NOS, when purchasing equipment, specifies with the supplier that the products must comply with safety standards, including the substances they contain. Criteria met

CE5.5 - Product-as-a-service and other circular use- and result-oriented service models

Criteria	Description (not exhaustive)	Alignment Analysis
SC	The activity leads, in practice, to an increase in the useful life or intensity of use of the product. In case it involves the delivery of packaged products, the packaging must be manufactured with at least 65% recycled material, the materials (paper packaging) are certified and only uncoated monomaterials (plastic packaging) are used.	In this activity, NOS considered only active equipment sold outside the scope of NOS's contracts as operators and those installed to support NOS Smart Home/NOS Alarmes services. This equipment can be used by several customers and is not for exclusive use, and NOS intervenes to inject them into the network, increasing their useful lives and ensuring that, after intervention, they have a longer durability than the original. In 2024, it was not possible to gather information to meet the criteria regarding the

Criteria	Description (not exhaustive)	Alignment Analysis
		packaging of products and their materials used. Criteria not met
DNSH – CCM	The direct GHG emissions of the activity are less than 270g CO2e/kWh. The activity has a strategy to account for and reduce GHG emissions resulting from upstream and downstream services in the value chain.	NOS does not intervene in the equipment, focusing only on its availability. In 2024, it was not possible to gather information to assess the existence of a Plan or Strategy aimed at accounting for and reducing GHG emissions in the phases of product acquisition, shipments and returns, cleaning and maintenance operations, and product end-of-life. Criteria not met
DNSH – CCA	Development of a Climate Risk and Vulnerability Assessment (CRVA) and development and implementation of a subsequent Adaptation Plan.	For a detailed assessment of response to Appendix A see analysis below. Criteria met
DNSH - WTR	It shall comply with the conditions of Appendix B.	It was not possible to obtain a response from the responsible entity about conducting an Environmental Impact Assessment (EIA) that addresses the issue of Water and Marine Resources. Criteria not met
DNSH - PPC	It shall comply with the conditions of Appendix C.	NOS, when purchasing equipment, specifies to the supplier that the products must comply with safety standards, including the substances they contain. Criteria met

CCM6.5 - Transport by motorbikes, passenger cars and light commercial vehicles

Criteria	Description (not exhaustive)	Alignment Analysis
SC	For vehicles in categories M1 and N1, until 31 December 2025, specific CO_2 emissions are less than 50 gCO_2/km.	It was possible to assess that 420 of the vehicles in NOS's fleet meet the Substantial Contribution criterion. Criteria met
DNSH – CCA	Development of a Climate Risk and Vulnerability Assessment (CRVA) and development and implementation of a subsequent Adaptation Plan.	For a detailed assessment of response to Appendix A see analysis below. Criteria met
DNSH - CE	Vehicles in categories M1 and N1 are reusable or recyclable up to a minimum of 85% of their weight and are reusable or recoverable up to a minimum of 95% of their weight.	In 2024, it was not possible to collect the necessary information to assess the criterion properly. Criteria not met
DNSH - PPC	The vehicles meet the requirements of the Euro 6 standard for emissions and until December 31, 2025, CO_2 emissions are less than 50 gCO_2/km. The external noise class of the tyres is A, and the rolling resistance class of the tyres is A or B. Vehicles comply with Regulation No. 540/2014 on the sound level of vehicles and quiet replacement systems.	In 2024, it was not possible to collect the necessary information to assess the criterion properly. Criteria not met

CCM7.3. - Installation, maintenance and repair of energy efficiency equipment

Criteria	Description (not exhaustive)	Alignment Analysis
SC	The activity considers the adoption of specific renovation measures, based on the installation, maintenance, or repair of energy-efficient equipment	NOS changed the lights placed in the stores and the HVAC systems to more efficient equipment. It was also possible to verify from suppliers that only LED luminaires are energy class A. Criteria met
DNSH – CCA	Development of a Climate Risk and Vulnerability Assessment (CRVA) and development and implementation of a subsequent Adaptation Plan.	For detailed assessment of response to Appendix A see analysis below. Criteria met
DNSH - WTR	It shall comply with the conditions of Appendix B.	It was not possible to collect the information necessary to evaluate the criterion properly. Criteria not met
DNSH - CE	Economic operators assess availability and apply techniques that promote the reuse, durability, recycling, and traceability of products.	In 2024, it was not possible to collect the necessary information to assess the criterion properly. Criteria not met
DNSH - PPC	It shall comply with the conditions of Appendix C.	The supplier of the equipment purchased by NOS has confirmed its compliance with Annexes I or II of Regulation (EU) 2019/1021, Annexes I or II of Regulation (CE) No. 1005/2009, Annex II of Directive 2011/65/EU, and Regulation (CE) No. 1272/2008. However, it was not possible to validate compliance with the remaining EU Taxonomy requirements. Criteria not met
DNSH - BIO	It must comply with the conditions of Appendix D.	It was not possible to collect the information necessary to evaluate the criterion properly. Criteria not met

CCM7.5. - Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings

Criteria	Description (not exhaustive)	Alignment Analysis
SC	The activity considers the installation, maintenance and repair of instruments or devices for monitoring energy consumption.	NOS acquired timed analogue clocks (automation and building control systems) that were installed in several NOS stores, to reduce continuous night loads. Criteria met
DNSH – CCA	Development of a Climate Risk and Vulnerability Assessment (CRVA) and development and implementation of a subsequent Adaptation Plan.	For a detailed assessment of response to Appendix A see analysis below. Criteria met
DNSH - WTR	It shall comply with the conditions of Appendix B.	It was not possible to collect the information necessary to evaluate the criterion properly. Criteria not met
DNSH - CE	Economic operators assess availability and apply techniques that promote the reuse, durability, recycling, and traceability of products.	In 2024, it was not possible to collect the necessary information to assess the criterion properly. Criteria not met

Criteria	Description (not exhaustive)	Alignment Analysis
DNSH - PPC	It shall comply with the conditions of Appendix C.	The supplier of the equipment purchased by NOS demonstrates its compliance with Annex II of Directive 2011/65/EU, Annex XVII of Regulation (CE) No. 1907/2006 and Articles 57 and 59 of Regulation (CE) No. 1907/2006. However, it was not possible, in 2024, to validate compliance with the remaining EU Taxonomy requirements. Criteria not met
DNSH - BIO	It must comply with the conditions of Appendix D.	It was not possible to collect the information necessary to evaluate the criterion properly. Criteria not met

CCM7.6. - Installation, maintenance and repair of renewable energy technologies

Criteria	Description (not exhaustive)	Alignment Analysis
SC	The systems targeted for installation, maintenance or repair are included in the list of equipment required by the Taxonomy (e.g. solar photovoltaic systems and auxiliary technical equipment or transpired solar collectors and auxiliary technical equipment)	NOS has acquired and installed solar panels on its infrastructures. Criteria met
DNSH – CCA	Development of a Climate Risk and Vulnerability Assessment (CRVA) and development and implementation of a subsequent Adaptation Plan.	For detailed assessment of response to Appendix A see analysis below. Criteria met
DNSH – WTR	It shall comply with the conditions of Appendix B.	It was not possible to collect the information necessary to evaluate the criterion properly. Criteria not met
DNSH – CE	Manufacturers should promote the reuse of raw materials, design durable and recyclable products, prioritise recycling in waste management, and disseminate information on substances of concern throughout the life cycle of products.	Operators promote the design of products with high durability, recyclability, and ease of assembly. However, despite being questioned, it was not possible to obtain information on compliance with the remaining criteria. Criteria not met
DNSH – PPC	It shall comply with the conditions of Appendix C.	In 2024, the criteria of Regulation (CE) No 1272/2008 was met, one of the hazard classes or categories referred to in Article 57 of Regulation (CE) No 1907/2006. However, it was not possible to assess the applicability for the remaining criteria. Criteria not met
DNSH – BIO	It must comply with the conditions of Appendix D.	An Environmental Impact Assessment or other type of preliminary assessment of the infrastructure construction project has not been conducted in accordance with Directive 2011/92/EU. Criteria not met

CCM8.1. - Data processing, hosting, and related activities

Criteria	Description (not exhaustive)	Alignment Analysis
SC	The relevant practices from the list of "planned practices" in the latest version of the European Code of Conduct for Data Centre Energy Efficiency have been adopted. The global warming potential (GWP) of the refrigerants used in the data centre cooling system does not exceed 675.	NOS seeks to follow the European code of conduct for energy efficiency, considering the particularities of its facilities, ensuring that the good practices it implements are aligned with the document. Data Centres are audited in accordance with national legislation, and only the Data Centre located in NorteShopping has not been audited in the last 3 years. However, the GWP of the three Data Centres are higher than 675. The solutions associated with the Data Centres were evaluated according to the same SC and DNSH criteria, as the Data Centres themselves. Criteria not met
DNSH – CCA	Development of a Climate Risk and Vulnerability Assessment (CRVA) and development and implementation of a subsequent Adaptation Plan.	For detailed assessment of response to Appendix A see analysis below. Criteria met
DNSH - WTR	The activity developed is based on the identification and treatment of environmental degradation risks related to the preservation of water quality and the prevention of water stress, in accordance with Appendix B of the EU Taxonomy.	In 2024, it was not possible to collect the necessary information to assess the criterion properly. Criteria not met
DNSH - CE	The equipment used complies with the data storage requirements in accordance with Directive 2009/125/CE. The equipment used complies with the requirements of substances present in accordance with Directive 2011/65/CE. There is a waste management plan that ensures maximum recycling of end-of-life electrical and electronic equipment.	This year, it was not possible to gather the necessary information to accurately assess compliance with Directive 2009/125/CE. In the NOS Data Centres, lead batteries are used to ensure the autonomy of the facilities, in accordance with the legislation, and the recommended periodic maintenance is conducted. Although there is no specific Waste Management Plan, NOS uses brokers who are interested in the equipment, enhancing reuse. If there are no interested parties, the equipment is sent for recycling. In 2024, there were no Data Centre equipment scraps. Criteria not met

CCM8.2. - Data-driven solutions for GHG emissions reduction

Criteria	Description (not exhaustive)	Alignment Analysis
SC	The ICT solutions used should contribute to the reduction of GHG emissions. In the case of solutions already pre-existing on the market, they must comparatively present a substantial reduction in GHG emissions throughout the life cycle. Emissions shall be calculated based on Recommendation 2013/179/EU or ETSI ES 203	In 2024, NOS identified twenty-five solutions in the business segment that are based on the provision of data and allow for the reduction of GHG emissions. The exception is the 5G mobile network, which does not comply with the criteria because an assessment of GHG emissions

	199, ISO 14067:2018 or ISO 14064-2:2019 and the quantification of the emission reduction shall be verified by an independent third party.	associated with its operation has not been conducted. Criteria met
DNSH – CCA	Development of a Climate Risk and Vulnerability Assessment (CRVA) and development and implementation of a subsequent Adaptation Plan.	For a detailed assessment of response to Appendix A see analysis below. Criteria met
DNSH - CE	The equipment used complies with the data storage requirements in accordance with Directive 2009/125/CE. The equipment used complies with the requirements of substances present in accordance with Directive 2011/65/CE. There is a waste management plan that ensures maximum recycling of end-of-life electrical and electronic equipment.	The solutions identified and that comply with the SC also comply with 2009/125/EC and 2011/65/EU. The criterion is not met only by the 5G mobile network since there is no Waste Management Plan that guarantees maximum recycling at the end of its useful life. Criteria met

Appendix A

To validate the alignment, it is crucial that all eligible activities comply with Appendix A, associated with the criteria for Substantial Contribution to the activities of the Climate Change Adaptation objective and Do No Significant Harm to the Climate Change Adaptation objective for the activities of the other objectives.

According to Appendix A, an entity must conduct a Climate Risk and Vulnerability Assessment (CRVA), assessing material physical climate risks to understand the exposure of its assets and operations. Additionally, adaptation solutions must be assessed, and an Adaptation Plan must be developed.

NOS's Climate Vulnerability and Risk Assessment is based on the exercise of identifying material risks, based on the climate risks listed in Table II of Appendix A of the Delegated Regulation (EU) 2021/2139 of the Commission. This assessment was conducted considering how the risks listed in Table II may impact NOS's assets, given their various natures and locations. This assessment highlighted two acute risks, the risk of extreme wind and precipitation events and forest fires, and one chronic risk, the increase in average air temperature, as the material risks most likely to affect NOS's assets and operations.

The assessment of these risks was informed by the projections of the European Environmental Agency and the CE Joint Research Centre for Europe until 2100, as well as by the most recent report of the Intergovernmental Panel on Climate Change for the Mediterranean region, which considers the recommended RCP scenarios for short, medium and long-term time horizons, assessing the potential impact on NOS's infrastructures over this century.

To understand the financial impacts of the risks identified in NOS's business, an analysis was developed for acute risks, based on similar climatic events that have occurred in recent years and that affected NOS's infrastructures. For chronic risk, considering that projections indicate an average temperature increase of 2°C, the additional energy costs necessary to keep the equipment in operation were estimated.

As a result of the analysis conducted, adaptation solutions with the potential to reduce risks were identified and implemented, including the adoption of measures to supervise the network and infrastructure services, close collaboration with the National Civil Protection Authority to receive personalized alerts on occurrences that may affect infrastructure and the implementation of preventive cleaning actions in areas particularly vulnerable to the wildfire risk.

The measures implemented in NOS's plans also include solutions for acute physical risks, which are integrated into the Business Continuity Management (BCM) and Network and Services Supervision processes, being monitored and evaluated within those processes. The solutions for chronic physical risk are part of NOS's energy efficiency programme, which are also monitored and evaluated in this context. This planning is dynamic and is constantly reviewed and updated with new measures as needed.

In 2025, NOS will develop an internal project to strengthen the assessment of climate risks and opportunities, intending to do so in accordance with the TCFD. The project will also include the creation of a formalized Action Plan, which will identify both measures to adapt to material climate risks, as well as actions to manage or create opportunities. This will allow for a deeper assessment to be developed and reinforce compliance with the criteria of Appendix A.

Appendix B

To validate compliance with the DNSH WTR, it is necessary to verify the following topics, for each activity individually:

- Ensure that there is a management plan for the use and protection of water resources drawn up for potentially affected water bodies (water quality, water stress);
- Assess the impacts that these facilities may have on the preservation of water quality and prevention of water stress were evaluated (e.g. through an environmental impact assessment, among others);
- The activity does not negatively impact the good environmental status of marine waters, according to the descriptors of Directive 2008/56/CE.

Appendix C

Appendix C establishes a set of criteria regarding substances whose use must be excluded during the execution of activities.

To validate compliance with the DNSH PPC, the activity shall not include the manufacture, placing on the market or use of various substances, including those listed in Annexes I or II to Regulation (EU) 2019/1021, mercury and mercury compounds, as defined in Regulation (EU) 2017/852, among others.

Appendix D

To validate compliance with the DNSH BIO, it is necessary to verify the following topics, for each activity individually:

- An Environmental Impact Assessment (EIA) or a screening is conducted in accordance with Directive 2011/92/EU;
- The necessary mitigation and compensation measures are implemented to protect the environment;
- In biodiversity-sensitive areas, such as Natura 2000, UNESCO World Heritage Sites and other protected areas, an appropriate assessment is conducted, where applicable, and the necessary mitigation measures are implemented based on its findings.

Minimum Safeguards

The EU Taxonomy establishes that, in addition to making a significant contribution to one of the environmental objectives and not significantly harming the others, companies must comply with the Minimum Safeguards (MS) for their activities to be aligned.

The MS aim to ensure that the entities conduct their activities in accordance with the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, a Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Final Report on Minimum Safeguards, released by the European Commission's Sustainable Finance Platform in October 2022, identifies four key areas for assessing compliance with the Minimum Safeguards: Human Rights, Corruption, Taxation and Fair Competition.

In 2024, an analysis was conducted on the existing procedures for the four identified key areas to assess compliance with the Minimum Safeguards:

Human Rights

As highlighted throughout this Report, the issue of Human Rights is present in NOS's daily operations, affecting how it interacts with its employees, partners, and suppliers.

NOS has a Human Rights Policy and a Code of Ethics that contribute to the definition its approach to Human Rights, clarifying the obligations to be respected and encouraging the promotion of these obligations in accordance with accepted international principles, standards, and laws. NOS subscribes to the CEO's Guide on Human Rights, committing to its principles and to innovate in practices aimed at improving living conditions, its employees and the communities impacted by the company's activity.

These documents establish NOS's commitment to international standards and laws, including those of the United Nations and the OECD, such as: OECD Guidelines for Multinational Enterprises (OECD MNE Guidelines), UN Guiding Principles on Business and Human Rights (UNGPs) and The International Bill of Human Rights.

In the Human Rights Policy, publicly available on the NOS website, the internal policies, and processes that employees must follow are identified, stipulating the expected behaviour, such as promoting diversity, inclusion, equal opportunities and avoiding discriminatory behaviour. In this policy, NOS undertakes to manage the supply chain responsibly in the field of Human, labour, and social rights, requiring partners and suppliers to act in accordance with the principles of the NOS Code of Ethics, Sustainability Policy and the Sustainability Requirements for Suppliers and Partners.

It is important to note that all workers in the value chain are covered by the policies and good practices of people management established internally by NOS and, in case of Human Rights violations, corrective measures are adopted.

In addition, NOS also has General Conditions for the Supply of Goods and Services to the NOS Group and a NOS Purchasing manual that regulates the processes of selection, adjudication, and evaluation of suppliers.

As described in sections 5.2.1. Policies related to own labour (S1-1) and 6.2.1. Policies related to employees in the value chain (S2-1), NOS establishes responsibility for the implementation of its internal policies and procedures in the Executive Committee. The "Investor Relations and Sustainability" area is responsible for implementing these policies, reporting directly to the CFO regarding the Human Rights Policy.

NOS is taking the first steps in the creation of its formal Human Rights Due Diligence, having initiated the Screening process of its suppliers, which consists of four phases: supplier selection; supplier survey; evaluation process; incorporation of results. As mentioned in section 9.2.2. Supplier relationship management (G1-2), in 2023, NOS started the ESG survey process of its suppliers, starting with the suppliers with the highest risk. This evaluation includes topics related to Human Rights, where suppliers are asked about the existence of:

- Internal policies that respect the UN Guiding Principles on Business and Human Rights (UNGPs);
- Human Rights Due Diligence Systems;
- Prevention measures to avoid Human Rights violations;
- Measures to ensure that slavery or human trafficking do not occur in their organisations.

It should be noted that, within the scope of the 2021-2025 sustainability strategy, NOS has set a strategic goal to conduct environmental and social assessments of 100% of high-risk suppliers by 2025.

Regarding the procedures and mechanisms that allow the assessment of risks and impacts on Human Rights, NOS has an Integrated Management System, whose review cycle took place in 2024, as well as the assessment of Double Materiality, which allows the identification and mapping of the risks and impacts concerning Human Rights.

In 2024, no cases of non-compliance with Human Rights were identified, both in NOS's activities and in its value chain.

NOS also provides training and awareness sessions to its employees, suppliers, and partners, addressing ethics issues, including those related to Human Rights.

Corruption and Bribery

NOS has a Code for the Prevention of Corruption and Related Infractions, publicly available on the NOS website and approved in 2022, which applies to all companies in the group and aims to establish principles, values, and rules of action in matters of corruption and related infractions, including guidelines for the acceptance and offer of benefits.

In this Code, NOS establishes that it is forbidden to offer or promise benefits to representatives of the public and private sector, with exceptions defined in its policies. The acceptance of benefits from people or entities that have or may have business relations with the company is prohibited, especially the acceptance of products and services by representatives of the public sector, customers, competitors, trade associations, banks, suppliers, and other stakeholders. The Code defines the conditions applicable to the hiring of third parties, who must accept NOS's guidelines on Ethics and Corruption Prevention. Finally, it is expressly prohibited to engage in acts aimed at concealing or hiding the illicit origin of goods or advantages obtained through crimes.

The Prevention Plan for Risks of Corruption and Related Offenses, approved in 2022 and available on the website, defines the prevention and internal control measures as well as the risk assessment procedures in this matter, which encompasses NOS itself and its suppliers. This assessment includes the identification of the NOS businesses that are subject to higher risk in terms of Corruption and Bribery. The risk assessment is conducted by the Risk and Compliance area, which is responsible for internal control, including the analysis, audit and investigation of indications of irregularities related to ethics and corruption prevention.

There is also a record of all irregularities related to the Code of Ethics and/or Code of Conduct for the Prevention of Corruption and Related Offences, and no case of non-compliance in terms

of Corruption and Bribery was identified in 2024, both in NOS's operations and in its value chain. NOS has disciplinary procedures in place to sanction irregularities related to compliance with the Code of Ethics and/or Code of Conduct for the Prevention of Corruption and Related Offences. After investigation, sanctions may result in a warning, reprimand, or other type of sanction.

Taxation

In 2022, NOS approved a Tax Policy that establishes principles, values and standards that guide its tax strategy and reflect its commitment to tax regulations. Among the principles adopted, full compliance with current tax legislation and rules stands out, as well as monitoring the impacts of new legislative measures. NOS ensures compliance with all tax obligations within the stipulated deadlines, ensuring the proper and prudent interpretation of the legislation in the operations conducted.

NOS defends its legitimate interests through administrative or judicial means when necessary, having reported zero cases of non-compliance in terms of Taxation. It defines and implements frameworks for supervision, review, and control frameworks for the tax function, ensuring compliance and efficiency in tax management. Thus, it promotes good tax practices and fosters cooperation with the Tax Administration, ensuring efficient and transparent tax management.

The topic of Taxation is covered in training and information sharing moments, including tax legislation disclosed, information shared in share, training for interns and dissemination of various information, among others.

Fair Competition

NOS's activities are conducted in accordance with the legal requirements on Fair Competition, including in its internal policies specific rules regarding good competition practices, as well as in the Code of Ethics to which all employees are subject. In 2024, no cases of Fair Competition non-compliance were reported in NOS's operations or in its value chain.

Internal control procedures are in place to identify critical areas with the highest competition risk, which are closely monitored. In higher risk topics, it is recommended to consult the regulation and competition department. In addition to specific risk training, business decisions in areas with vertical integration or dominant position are subject to special scrutiny to minimize infringement risks.

NOS offers training courses that address the subject, covering general concepts about competition, risks and responsibilities for the company and its senior management.

In addition, NOS has a channel for requests for clarification, as well as channels for reporting irregularities related to the four key areas, which can be used by all stakeholders, namely employees, partners, suppliers, customers or third parties. The channels are available on the NOS Intranet and on the NOS website:

- Clarification requests: duvidas.etica@nos.pt;
- Reporting of alleged irregularities: comunicar.irregularidades@nos.pt or P.O. Box 4035, Loja CTT Senhora da Hora, 4461 - 901 Senhora da Hora.



3. Evaluation of KPIs

The EU Taxonomy Regulation sets out the KPIs associated with environmentally sustainable economic activities, which must be reported by non-financial companies. These KPIs include the proportion of Turnover, CapEx, and OpEx associated with these activities.

The exercise covered NOS's activities, including only the entities over which it has control. The EU Taxonomy specifies that intra-group movements should not be considered, so activities conducted between NOS entities, and their transactions, were disregarded from the analysis.

The calculation of the KPIs associated with the activities considered eligible and aligned with the EU Taxonomy was carried out based on the same consolidation principles applied to the financial statements, in accordance with the International Financial Reporting Standards ("IAS/IFRS") issued by the International Accounting Standards Board ("IASB") and Interpretations issued by the International Financial Reporting Interpretations Committee ("IFRIC") or by the former Standing Interpretations Committee ("SIC"), adopted by the European Union, effective 1 January 2024.

Turnover

The proportion of the Turnover was calculated by the quotient between the net turnover generated by products or services, including intangibles, associated with economic activities considered eligible or aligned with the EU Taxonomy guidelines (numerator) and the total net NPV (denominator).

The denominator considered the total sales of products and services, from which rebates and discounts on sales, value added tax (VAT), and any other taxes applied directly on turnover were deducted. In 2024, the denominator of Turnover was €1,696,263.12 thousand. This figure is set out in section 32 of the Consolidated Financial Statements.

For the numerator, the Turnover corresponding to the eligible non-aligned activities and the eligible aligned activities was included, as described in detail in Table A.

For the numerators of eligible and aligned activities, the following activities and considerations have been considered:

- Activity CCA8.3: partially aligned, with only revenues from the management of content rights addressing Climate Change being considered. In 2024, the documentaries "Terra que Marca", "Juunt Pastaza Entsari", "Oceans" and "African Safari", the series "Family like ours" and "Of Money & Blood", and the films "Promised Land", "The Road", "Blueback", "Supercell", "Acide" and "Primeira Obra" were considered aligned.

For the numerators of eligible activities, the following activities and considerations have been considered:

- Activity CCA8.3: partially eligible including revenue from the management of other rights and advertising;
- Activity CCA13.3: revenues from ticket sales, film content rights and advertising were considered. The contents shown did not address the theme of Climate Change, making them only eligible and not aligned;
- Activity CCM8.3: the revenue generated by the storage space in Data Centres and Cloud services were considered;
- Activity CCM8.2: revenue from data-driven solutions for the reduction of GHG emissions was accounted for, considering solutions that met all the alignment criteria of the EU Taxonomy;
- Activity CE5.4: revenue from the sale of used equipment by NOS was considered;
- Activity CE5.5: the revenue from the rental of boxes and other additional residential equipment, fully owned by NOS, and the provision of equipment associated with NOS Alarmes were accounted for.

CapEx

The proportion of capital expenditure, or CapEx, was calculated using the ratio between the CapEx value associated with economic activities considered eligible or aligned with the EU Taxonomy guidelines (numerator), and the total CapEx value of companies considered for the fiscal year 2024 (denominator).

The denominator considered additions to tangible and intangible fixed assets and rights of use during the year considered before depreciation, amortisation, and any new measurements, including those resulting from revaluations and impairments, for the year in question and excluding changes in fair value. Additions to tangible and intangible assets resulting from business combinations were also considered.

According to the financial statements, presented in the Notes 7, 8, 9 and 10 of this document, the following amounts were considered for Tangible Fixed Assets, Intangible Assets, Contract costs and Rights of Use.

Tangible assets

Category	Value (k)
Basic equipment	41,149 €
Administrative equipment	1,223 €
Other tangible assets	205 €
Tangible assets in-progress	127,972 €

Intangible assets

Category	Value (k)
Industrial property and other rights	6,394 €
Intangible assets in-progress	95,583 €

Contract costs

Category	Value (k)
Industrial property and other rights	70,527 €
Intangible assets in-progress	29,617 €

Rights of use

Category	Value (k)
Telecommunications towers and rooftops	28,914 €
Movie theatres	9,815 €
Transponders	182 €
Equipments	15,504 €
Buildings	3,616 €
Stores	3,507 €
Other	12,037 €

In 2024, the denominator of CapEx amounted to the value of €446,245 thousand.

The numerator, detailed in Tables B, is the part of capital expenditure that is associated with assets or processes associated with eligible economic activities and aligned with the EU Taxonomy.

For the numerators of eligible and aligned activities, the following activities and considerations have been considered:

- **Activity CCA8.3:** Capitalization of content rights that addressed Climate Change were considered aligned.

For the numerators of eligible and non-aligned activities, the following specifications were considered:

- **Activity CCA13.3:** additions to movie theatres were accounted;
- **Activity CCM6.5:** includes additions to property, plant and equipment and rights of use of categories M1 and N1 vehicles, classified as Euro 5 or Euro 6;
- **Activity CCM7.3:** investments in HVAC equipment, LED luminaires;
- **Activity CCM7.5:** investments in analogue clocks were considered;
- **Activity CCM7.6:** investment in photovoltaic panels was recognized;
- **Activity CCM8.1:** Data Centre leasing contracts longer than one year were accounted for;
- **Activity CCM8.2:** investments in the 5G mobile network were recognized;
- **Activity CE4.1:** capitalizations of technology solutions were considered;

- **Activity CE5.5:** additions to the basic equipment made available to NOS customers were recognized.

OpEx

The proportion of operating expenses was calculated using the quotient between the EU Taxonomy-aligned OpEx value (numerator) and the total OpEx value of the companies considered for 2024 (denominator).

Under the EU Taxonomy, the denominator of OpEx is the non-capitalised costs that relate to research and development, building renovation measures, short-term lease, maintenance and repair, and any other direct expenditures relating to the day-to-day servicing of assets the tangible fixed assets necessary to ensure their operation, by the company or by third parties to which the activities are subcontracted.

In 2024, the denominator of OpEx amounted to €101,319.61 thousand, which is equivalent to the sum of the costs associated with the categories shown:

Category	Value (k)
Maintenance and repair	57,657.21 €
Short-term lease	39,989.85 €
Day-to-day servicing of Tangible Fixed Assets	3,672.55 €

The level of detail presented is not directly available in the financial statements, however, the values are allocated to the "Direct costs" and "Supplies and external services" components of the Consolidated statement of income by nature.

The numerator, which consists of the amount associated with both the non-aligned and the aligned eligible activities, detailed in Table C, corresponds to the part of the operational costs associated with the development of the activities.

For the numerators of eligible and non-aligned activities, the following activities and considerations have been considered:

- **Atividade AAC13.3:** foram considerados os gastos de manutenção das salas de cinema e dos equipamentos adjacentes;
- **Atividades MAC7.3:** foram contabilizados os gastos com a manutenção e reparação das luminárias LED;
- **Atividades MAC7.6:** foram contabilizados os gastos com a manutenção e reparação dos painéis fotovoltaicos;
- **Atividade MAC6.5:** foram incluídos os gastos de manutenção e reparação, assim como os contratos de leasing de curto prazo, das viaturas de categoria M1 e N1, classificadas como Euro 5 ou Euro 6;
- **Atividade MAC8.1:** abrange os gastos de manutenção e reparação dos Data Centres, tanto corretivas como preventivas;
- **Atividade MAC8.2:** foram considerados os gastos de manutenção e reparação da rede móvel 5G;
- **Atividade EC4.1:** contabilizou os gastos de manutenção e reparação de IT, além dos gastos com investigação e desenvolvimento (R&D) para manter as soluções de tecnologias da informação e operacionais baseadas em dados;

- Atividade EC5.1: foram considerados os gastos de manutenção e reparação dos equipamentos que são intervencionados e reintegrados na rede após uso pelos clientes.
- Activity CCA13.3: maintenance expenses of movie theatres and adjacent equipment were considered;
- Activity CCM7.3: expenses with the maintenance and repair of LED luminaires were accounted for;
- Activity CCM6.5: maintenance and repair expenses, as well as short-term leasing contracts, of category M1 and N1 vehicles, classified as Euro 5 or Euro 6, were included;
- Activity CCM8.1: maintenance and repair costs of Data Centres, both corrective and preventive were accounted for;
- Activity CCM8.2: maintenance and repair expenses of the 5G mobile network were considered;
- Activity CE4.1: accounted for IT maintenance and repair expenses, in addition to research and development (R&D) expenses to maintain data-driven information technology and operational solutions;
- Activity CE5.1: maintenance and repair expenses of equipment that are intervened and reintegrated into the network after use by customers were considered.

No OpEx movements associated with eligible and aligned activities were identified.

Additional methodological notes

The Taxonomy exercise was conducted on the basis of the Delegated Regulations supplementing the Taxonomy Regulation, namely Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021, Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021, Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022, Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 and Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023. As well as all communications and "Frequently Asked Questions" that the European Commission made available were considered.

The 2024 fiscal year stood out for the use of a rigorous approach to the precision of the allocation of numerators to EU Taxonomy activities and the elimination of the possibility of double counting. One of the focuses was also the non-accounting of movements that do not comply with the guidelines of the EU Taxonomy, such as consumables in the OpEx KPI.

Table A:
Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – disclosure covering 2024

Financial year 2024	Year			Substantial Contribution Criteria						DNSH criteria ("Does Not Significantly Harm")									
Economic Activities	Code	Turnover (k€)	Proportion of turnover, year 2024 (%)	CCM	CCA	WTR	PPC	CE	BIO	CCM	CCA	WTR	PPC	CE	BIO	Minimum Safeguards	Proportion Taxonomy - aligned (A.1.) or eligible (A.2) turnover, year 2023	Category Enabling Activity	Category Transitional Activity
A. TAXONOMY-ELIGIBLE ACTIVITY																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Programming and broadcasting activities	AAC8.3.	45 €	0.00%	N	S	N	N	N	N	S	S	S	S	S	S	S	2.2%	**E**	
Data-driven solutions for reducing GHG emissions	MAC8.2.	19 979 €	1.18%	S	N	N	N	N	N	S	S	S	S	S	S	S	0.2%		
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		20 024 €	1.18%	1.18%	0.00%	0.00%	0.00%	0.00%	0.00%	S	S	S	S	S	S	S	2.7%		
Of which enabling		45 €	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	S	S	S	S	S	S	S	2.2%	**E**	
Of which transitional		0 €	0.00%	0.00%						S	S	S	S	S	S	S	0%		**T**
A.2. Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned activities)																			
Motion picture. video and television programme production. sound recording and music publishing activities	CCA13.3.	45 984 €	2.71%	N/EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Programming and broadcasting activities	CCA8.3.	50 993 €	3.01%	N/EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Provision of IT/OT data-driven solutions	CE4.1.	0 €	0.00%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.0%		
Transport by motorbikes. passenger cars and commercial vehicles	CCA6.5. /CCM6.5.A	0 €	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Installation. maintenance and repair of energy efficiency equipment	CCA7.3/ CCM7.3.	0 €	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Installation. maintenance and repair of instruments and devices for measuring. regulation and controlling energy	CCA7.5/ CCM7.5.	0 €	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		

performance of buildings		0 €	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Installation. maintenance and repair of renewable energy technologies	CCA7.6/ **CCM7.6.**	9,478 €	0.56%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1.9%		
Data processing. hosting and related activities	CCA8.1/ **CCM8.1.**	0 €	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Computer programming. consultancy and related activities	CCM8.2.	0 €	0.00%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.0%		
Repair. refurbishment and remanufacturing	CE5.1.	105 €	0.01%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.0%		
Sale of second-hand goods	CE5.4.	19,842 €	1.17%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								1.3%		
Product-as-a-service and other circular use- and result-oriented service models	CE5.5.	19,842 €	1.17%	*N/EL*	*N/EL*	*N/EL*	*N/EL*	*EL*	*N/EL*								1.3%		
Turnover of Taxonomy-eligible but environmentally not sustainable activities (not Taxonomy-aligned activities) (A.2)		126,401 €	7.45%	0.56%	5.72%	0.00%	0.00%	1.18%	0.00%								3.2%		
A. Turnover of Taxonomy-eligible activities (A.1 + A.2)		146,425 €	8.63%	1.74%	5.72%	0.00%	0.00%	1.18%	0.00%										
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY																			
Turnover of Taxonomy-non-eligible activities		1,549,838€	91.37%																
Total		**1,696 263 €**	**100.00%**																

	Proportion of Turnover /Total Turnover	
	Taxonomy-aligned, per objective	**Taxonomy-eligible, per objective**
CCM	1.18%	0.56%
CCA	0.00%	6.28%
WTR	0.00%	0.00%
CE	0.00%	1.18%
PPC	0.00%	0.00%
BIO	0.00%	0.00%

Table B:
Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering 2024

Financial year 2024	Year			Substantial Contribution Criteria						DNSH criteria ("Does Not Significantly Harm")									
Economic Activities	Code	CapEx (k€)	Proportion of CapEx, year 2024 (%)	CCM	CCA	WTR	PPC	CE	BIO	CCM	CCA	WTR	PPC	CE	BIO	Minimum Safeguards	Proportion Taxonomy - aligned (A.1.) or eligible (A.2) CapEx, year 2023	Category Enabling Activity	Category Transitional Activity
A. TAXONOMY-ELIGIBLE ACTIVITY																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Programming and broadcasting activities	AAC8.3.	44 €	0.01%	N	S	N	N	N	N	S	S	S	S	S	S	S	5.5%	C	
Data-driven solutions for reducing GHG emissions	MAC8.2.	0 €	0.00%	S	N	N	N	N	N	S	S	S	S	S	S	S	7.6%		
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		44 €	0.01%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	S	S	S	S	S	S	S	13.5%		
Of which enabling		44 €	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	S	S	S	S	S	S	S	5.5%		
Of which transitional		0 €	0.00%	0.00%						S	S	S	S	S	S	S	0.0%		
A.2. Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned activities)																			
Motion picture. video and television programme production. sound recording and music publishing activities	CCA13.3.	9,815 €	2.20%	N/EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Programming and broadcasting activities	CCA8.3.	0 €	0.00%	N/EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Provision of IT/OT data-driven solutions	CE4.1.	36,075 €	8.08%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.5%		
Transport by motorbikes. passenger cars and commercial vehicles	CCA6.5. **/CCM6.5.**	4,692 €	1.05%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Installation. maintenance and repair of energy efficiency equipment	CCA7.3**/ CCM7.3.**	54 €	0.01%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Installation. maintenance and repair of instruments and devices for measuring. regulation and controlling energy	CCA7.5**/ CCM7.5**.	9 €	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		

performance of buildings																				
Installation. maintenance and repair of renewable energy technologies	CCA7.6/ **CCM7.6.**	63 €	0.01%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Data processing. hosting and related activities	CCA8.1/ **CCM8.1.**	163 €	0.04%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								2.9%		
Computer programming. consultancy and related activities	CCM8.2.	33,368 €	7.48%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Repair. refurbishment and remanufacturing	CE5.1.	0 €	0.00%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.0%		
Sale of second-hand goods	CE5.4.	0 €	0.00%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.0%		
Product-as-a-service and other circular use- and result-oriented service models	CE5.5.	40,547 €	9.09%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								11.6%		
CapEx of Taxonomy-eligible but environmentally not sustainable activities (not Taxonomy-aligned activities) (A.2)		124,787 €	27.96%	8.59%	2.20%	0.00%	0.00%	17.17%	0.00%								15.1%		
A. CapEx of Taxonomy-eligible activities (A.1 + A.2)		124,831 €	27.97%	8.59%	2.21%	0.00%	0.00%	17.17%	0.00%										
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY																			
CapEx of Taxonomy-non-eligible activities		321,413 €	72.03%																
Total		446,245 €	100.00%																

	Proportion of total CapEx/Total CapEx	
	Taxonomy-aligned, per objective	**Taxonomy-eligible, per objective**
MAC	0.00%	8.59%
AAC	0.01%	3.32%
RHM	0.00%	0.00%
EC	0.00%	17.17%
PCP	0.00%	0.00%
BIO	0.00%	0.00%

Table C:
Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering 2024

Financial year 2024	Year			Substantial Contribution Criteria						DNSH criteria ("Does Not Significantly Harm")									
Economic Activities	Code	OpEx (k€)	Proportion of CapEx, year 2024 (%)	CCM	CCA	WTR	PPC	CE	BIO	CCM	CCA	WTR	PPC	CE	BIO	Minimum Safeguards	Proportion Taxonomy - aligned (A.1.) or eligible (A.2) OpEx, year 2023	Category Enabling Activity	Category Transitional Activity
A. TAXONOMY-ELIGIBLE ACTIVITY																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Programming and broadcasting activities	AAC8.3.	0 €	0.00%	N	S	N	N	N	N	S	S	S	S	S	S	S	7.5%	**E**	
Data-driven solutions for reducing GHG emissions	MAC8.2.	0 €	0.00%	N	S	N	N	N	N	S	S	S	S	S	S	S	0.7%		
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0 €	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	S	S	S	S	S	S	S	9.1%		
Of which enabling		0 €	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	S	S	S	S	S	S	S	7.5%	**E**	
Of which transitional		0 €	0.00%	0.00%						S	S	S	S	S	S	S	0.0%		**T**
A.2. Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned activities)																			
Motion picture. video and television programme production. sound recording and music publishing activities	CCA13.3.	1,603 €	1.58%	N/EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Programming and broadcasting activities	CCA8.3.	0 €	0.00%	N/EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Provision of IT/OT data-driven solutions	CE4.1.	7,993 €	7.89%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								1.0%		
Transport by motorbikes. passenger cars and commercial vehicles	CCA6.5. **/CCM6.5.**	4,706 €	4.64%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Installation. maintenance and repair of energy efficiency equipment	CCA7.3**/ CCM7.3.**	3 €	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Installation. maintenance and repair of instruments and devices for measuring. regulation and controlling energy	CCA7.5**/ CCM7.5.**	0 €	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		

performance of buildings																			
Installation. maintenance and repair of renewable energy technologies	CCA7.6/ **CCM7.6.**	641 €	0.63%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Data processing. hosting and related activities	CCA8.1/ **CCM8.1.**	27 €	0.03%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								13.6%		
Computer programming. consultancy and related activities	CCM8.2.	61 €	0.06%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Repair. refurbishment and remanufacturing	CE5.1.	1,724 €	1.70%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.9%		
Sale of second-hand goods	CE5.4.	0 €	0,00%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.2%		
Product-as-a-service and other circular use- and result-oriented service models	CE5.5.	0 €	0,00%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								1.6%		
OpEx of Taxonomy-eligible but environmentally not sustainable activities (not Taxonomy-aligned activities) (A.2)		**16 758 €**	**16.54%**	5.36%	1.58%	0.00%	0.00%	9.59%	0.00%								17.3%		
A. OpEx das atividades elegíveis para taxonomia (A.1 + A.2)		**16 758 €**	**16.54%**	5.36%	1.58%	0.00%	0.00%	9.59%	0.00%										
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY																			
OpEx of Taxonomy-non-eligible activities		84,562 €	83.46%																
Total		**101,320 €**	**100.00%**																

	Total OpEx/OpEx Ratio	
	Taxonomy-aligned, per objective	**Taxonomy-eligible, per objective**
CCM	0.00%	5.37%
CCA	0.00%	6.89%
WTR	0.00%	0.00%
CE	0.00%	9.59%
PPC	0.00%	0.00%
BIO	0.00%	0.00%

1.3.3 SOCIAL

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1.3.3.1. ESRS S1 – Own workforce

Strategy

NOS's strategy regarding our employees reflects our commitment to responsible labor practices, aligned with the highest standards of sustainability and business ethics. For NOS, "own workforce" includes:

- Salaried employees: Workers with a direct contractual employment relationship with the company.
- Independent workers: Individual contractors providing services directly to the company or workers supplied by entities engaged in temporary employment activities (NACE code N78).

We recognize that responsible management of our people requires a comprehensive approach that addresses the following key subtopics:

- Working conditions

  We are committed to providing safe and dignified working conditions that align with best labor practices. This includes strict compliance with national and international regulations, as well as the implementation of policies that promote workplace well-being, health, and safety.

- Equal treatment and opportunities for all

  We foster an inclusive and equitable culture, ensuring that all employees have access to fair opportunities while actively preventing and combating direct and indirect discrimination. Diversity and inclusion are central to our ESG strategy, and we are committed to measuring and reporting progress in this area.

- Other labor-related rights

  We ensure respect for fundamental labor rights, including freedom of association, the right to collective bargaining, and protection against any form of exploitation or harassment. These principles are reinforced through internal policies and ongoing compliance monitoring within our operations and supply chains.

Our strategic approach is directly aligned with NOS's Sustainability Management System (SBM), integrating the internal team as a key pillar for generating sustainable value. We believe that responsible people management is not only an ethical imperative but also a driver of innovation, productivity, and organizational resilience.

To strengthen this commitment, we have defined specific metrics and targets for each subtopic, ensuring continuous monitoring and transparency in communication with stakeholders. This strategy reflects NOS's role as a responsible employer, contributing to the United Nations Sustainable Development Goals (SDGs) and strengthening our positive impact within the broader ecosystem.

1.3.3.1.1. Impacts, risks, and opportunities (ESRS 2 SBM-3)

NOS's strategy is designed to lead the markets in which it operates, driving continuous updates to its infrastructure, workforce, and broader society. This strategic approach directly responds to the Identified Real and Potential Impacts (IROs) by integrating actions that mitigate negative impacts while maximizing opportunities related to our workforce.

1. Mitigating negative impacts

NOS recognizes that inadequate working conditions, excessive work hours, or uncompetitive wages can negatively impact employees' quality of life and health. To mitigate these risks, the company has implemented:

- Fair and competitive wages, ensuring equity and competitiveness within the sector;
- Flexible work policies, including adjustable schedules and hybrid work models that facilitate work-life balance;
- Comfortable and well-adapted workspaces, providing a healthy and functional environment that enhances overall well-being.

These actions aim to ensure a work environment that prioritizes health, safety, and employee satisfaction, fostering a positive and sustainable experience for all.

2. Promoting opportunities to boost productivity and motivation

NOS is committed to creating work conditions that enhance employee motivation and productivity. This commitment is reflected in:

- Work flexibility policies that promote a healthy balance between personal and professional life;
- Mental health initiatives, such as well-being programs and support networks;
- Diversity and inclusion initiatives, ensuring the right to self-expression while linking motivation to respect for each employee's individuality.

These practices contribute to talent retention, reduced turnover, lower recruitment and absenteeism costs, and increased productivity and revenue.

3. Investing in skills development to retain talent

Continuous training and professional development are key pillars of NOS's strategy. This commitment leverages the opportunity to build a skilled, efficient, and productive workforce through:

- Technical training programs and digital/AI skill development, essential to keep up with digital transformation and future challenges;
- Career plans and internal growth opportunities, reinforcing NOS's attractiveness as an employer of choice.

These initiatives not only drive the company's productivity and growth but also enhance employee satisfaction and extend their average tenure within the organisation. This reinforces NOS's attractiveness as a leading employer while reducing costs associated with recruitment and the integration of new talent.

Connection with material topics

NOS's strategic initiatives are directly aligned with the material topics related to own workforce:

- Quality of life and well-being at work: Commitment to adequate working conditions, fair salaries, and flexible policies;
- Motivation and productivity: Promotion of work-life balance, diversity, and mental health;
- Talent development and retention: Investment in training and skill-building to address future challenges.

This integrated approach demonstrates NOS's commitment to maximizing workplace safety, well-being, productivity, and employee competitiveness, reinforcing its role as a benchmark for corporate best practices in Portugal.

NOS works daily to mitigate real and potential impacts on its workforce, involving employees in the development and implementation of strategic changes. This engagement is promoted through cross-functional projects, reinforcing active participation and employee commitment.

To ensure continuous adaptation, NOS conducts studies and initiatives that inform and shape its strategy and business model:

Climate Study: Conducted annually, the results of this study guide the People and Organisation Department in adapting existing human resources policies and developing strategies to mitigate less favourable results while enhancing aspects valued by employees.

Psychosocial Risk Study: The latest study, conducted in 2022, continues to guide the company's actions, with a particular focus on investments in health and well-being, reinforcing the company's commitment to employee care.

Organizational Health Index (OHI) Study: Conducted in 2023, this study complements the results of the Climate Study and supports the organisational strategy, ensuring consistent alignment with the identified needs.

Leadership Assessment: Leadershift: Launched in 2022, this awareness and development initiative for NOS leaders provided insights that shaped the company's people strategy, directly impacting its business strategy.

Specific Surveys: Whenever necessary, NOS conducts surveys to measure the impact of implemented initiatives, continuously adjusting its course of action to maximise results.

The results from these information sources are integrated into NOS's strategy definition, ensuring that the company remains agile and capable of responding to both internal and external needs. In parallel, the Performance Evaluation Model, revised and implemented in

2023, enables employees to play an active role in their development by defining initiatives and pathways for career progression.

Additionally, NOS recognises that external factors, such as the State Budget and its associated measures, have a direct impact on fiscal and salary-related issues. This impact is particularly relevant in operations such as the cinema business, where collective agreements and lower-wage roles are more prevalent. Similarly, these dynamics affect areas such as cleaning, maintenance, and customer service, requiring adjustments in hiring and management processes for these operations.

Material risks and opportunities

Investments in innovation and digital transformation create opportunities for upskilling and reskilling, strengthening employee competencies and enhancing market adaptability. Simultaneously, diversity, inclusion, and respect policies contribute to a positive and sustainable organizational environment.

However, competitive pressures and efficiency demands may pose challenges to employee health and well-being. NOS addresses these risks through mental health programs, continuous training, and a strong commitment to psychological safety.

Commitment to Sustainability

NOS has adjusted its vehicle policy, replacing fossil fuel-powered cars with hybrid or electric vehicles, further strengthening its commitment to sustainability.Additionally, the company has been actively pursuing its "Journey to Carbon Neutral 2030", implementing measures to reduce utility consumption in buildings by 70%, consume 100% renewable electricity, and fully electrify its fleet. These actions include:

- Recycling Stations: Waste reduction through awareness initiatives.
- Consumption Reduction: Implementation of utility management software to optimise energy use.
- Fleet Renewal: Tenders for the complete fleet renewal by 2025, promoting efficient driving techniques.
- Alternative Mobility Solutions: Development of business models for EV charging infrastructure and promotion of responsible mobility.

These initiatives enhance NOS's positive environmental impact and contribute to improving the quality of life for employees.



Inclusion and Workplace Safety

At NOS, there is a multidisciplinary team, with various skills and expertise, that operates to ensure occupational health and safety conditions for employees, taking into account their characteristics and the activities they perform according to their roles, considering the inherent risks.

As part of its Occupational Health and Safety (OHS) strategy, NOS identifies hazards and assesses the risks associated with the activities carried out in each role, defining action plans and control and monitoring measures.

NOS acknowledges that there may be vulnerable groups, such as pregnant and nursing employees, people with disabilities or impairments, migrants, among others, for whom exposure to risks may have different impacts (physical or mental).

It may be necessary to define and implement actions, as well as control measures, that can mitigate these impacts.

With the aim of promoting an equitable work environment in terms of access and opportunities, in 2024, NOS implemented the Neurodiversity Program, which has the mission of recruiting and training autistic professionals, integrating them into software engineering teams.

We have implemented prevention measures for employees exposed to electromagnetic radiation (CEM).

We value employee health and well-being through a structured program based on three pillars: physical, emotional, and social.

Several actions are part of this program, with the goal of taking care of our people and investing in their quality of life inside and outside the company.

Through the health insurance plan, employees have access to online medical consultations, such as psychology sessions and dedicated programs on smoking cessation, nutrition, parenting, among others.

We invest in training our leadership teams in Psychological First Aid, so they are prepared to support their teams in times of adversity.

Every month, we promote webinars on topics that may be currently challenging in employees' daily lives, providing them with knowledge to maintain a balance between personal, professional, and family life.

NOS has an occupational health service, where the medical team assesses employees' physical and mental fitness to perform their activities. This fitness assessment is provided after reviewing the employee's medical and work history, a detailed description of the current and previous roles, taking into account the time spent in those roles, the inherent risks, as well as results from complementary health exams. The occupational physician may issue a medical recommendation regarding the employee's ability to perform their role. In such cases, the People Services team is responsible for forwarding the recommendation to the employee's manager, so they can adapt the role accordingly. If necessary, the People Services team may seek support from other teams to find the best solution for the recommendation. Additionally, if an employee needs to be assessed by the occupational physician, they have the right to request an occasional occupational health consultation.

Impact management, risks and opportunities

1.3.3.1.2 Policies (S1-1)

(S1.MDR-P_01-06 / S1-1_01) The appreciation of people is a central pillar of our strategy, reflecting our commitment to fair working conditions, equal opportunities, and a safe and inclusive environment for all employees. These principles are materialized in Policies and Codes, which establish the guidelines for responsible management of our workforce, ensuring that our values of equity, transparency, and respect for labor rights are consistently applied throughout the organization.

NOS's policies reflect a systematic and committed approach to respecting and protecting the human rights of our employees. This commitment is evident in the establishment of internal policies, guidelines, and codes of conduct that aim to prevent the violation of any employee rights. We guarantee freedom of expression and association, promote workplace equality, and ensure the prohibition of child labor or forced labor, always in compliance with the standards set by the International Labour Organization (ILO).

Our policies, approved by the company's governing bodies, such as the Board of Directors and/or the Executive Committee, cover fundamental aspects of employee protection and well-being, including job security, balanced working hours, fair and adequate wages, and the strengthening of social dialogue. We also reinforce the importance of freedom of association, ensuring that employees have an active voice within the organization, through the existence of works councils and collective bargaining mechanisms.

Our commitment extends to work-life balance, promoting practices that ensure flexibility and well-being for employees. Workplace health and safety are also priorities, being proactively managed to ensure a healthy and protected work environment.

As part of our commitment to equal treatment and opportunities, we actively promote gender equality and equal pay for work of equal value, invest in the continuous training and development of our employees' skills, and ensure the inclusion of people with disabilities. Additionally, we have implemented strict measures against workplace violence and harassment, reinforcing our commitment to a respectful and safe professional environment. Diversity is also a core value, reflected in policies that foster a representative and inclusive work environment.

These guidelines are continuously updated to reflect the highest international standards and best industry practices, ensuring that the company remains aligned with the expectations of its stakeholders and regulatory requirements. All our Codes and Policies are publicly available in

the institutional section of our website, reinforcing our commitment to transparency, good governance, and the development of a sustainable and socially responsible work model.

Within the specific context of managing our employees, the following policies stand out:

- Human Rights Policy, which guides the company in promoting fundamental workers' rights and ensuring compliance with international principles of respect and dignity at work.
- Gender Equality Plan and the Commitment to Diversity and Inclusion Declaration, which structure concrete actions to ensure equity and representativeness within the organization.
- Code of Ethics and Code of Conduct for the Prevention and Combat of Workplace Harassment, which establish principles of integrity and respect in labor relations.
- Whistleblowing Regulation, ensuring safe and confidential mechanisms for reporting violations and protecting whistleblowers.
- Risk Management Policy, Sustainability Policy, Sustainability Requirements for Suppliers and Partners, and General Information Security Policy, which ensure protection and well-being of workers within the organizational context and the value chain.

Detailed information on each of these policies can be found in section "1.3.1.12. Policies (MDR-P)".

Commitment to Human Rights

(S1-1_03 / S1-1_04 / S1-1_05 / S1-1_06 / S1-1_07) NOS is firmly committed to its employees, ensuring that human and labor rights principles are respected and applied across all its organizational practices. This commitment is reflected in our policies and codes of conduct, which guarantee safe working conditions, promote freedom of association, eliminate any form of workplace discrimination, and categorically prohibit child and forced labor. Our Code of Ethics embodies this approach, aligning with key international frameworks, including the United Nations Global Compact, the Universal Declaration of Human Rights, and the International Labour Organization (ILO) Fundamental Principles and Rights at Work.

Beyond its direct impact on our employees, NOS extends these standards across its entire supply chain, ensuring that our principles are upheld and respected by all partners and suppliers we collaborate with.

NOS holds the responsibility to create and maintain an inclusive, diverse work environment based on equal opportunities. Our human resources management policy is guided by non-discrimination principles, ensuring that all employees—regardless of age, gender, sexual orientation, race, disability, religion, or belief—are treated fairly and equitably, particularly in recruitment, promotion, and termination processes. Diversity and inclusion are core values, reinforcing our commitment to meritocracy and ensuring that each employee has equal opportunities to grow and develop.

Furthermore, NOS adopts a strict stance against harassment and discrimination, ensuring a safe and respectful work environment. To support this commitment, we provide a confidential and accessible ethics and whistleblowing channel, allowing employees to report any cases of harassment or labor irregularities. These mechanisms are complemented by preventive programs, training initiatives, and corrective measures to ensure a swift and fair response.

Our performance evaluation process is based on transparency and meritocracy, ensuring that all employees have equal opportunities for career progression. Additionally, we promote continuous training and professional development, encouraging internal mobility and career growth within the company. Work-life balance is also a top priority, supported by flexible work arrangements and well-being initiatives.

Employee data privacy is an absolute commitment, ensuring that all personal information is handled with full confidentiality and in compliance with applicable regulations.

Engagement with our employees

At NOS, we ensure that our policies and commitments are clearly communicated and accessible to all employees. These documents are widely disseminated and reinforced through awareness-raising initiatives, ensuring that all employees understand their rights and responsibilities within the organization.

NOS fosters a culture of open dialogue and active participation, encouraging employees to share concerns, suggestions, and needs. To this end, we provide dedicated contact channels for support, as well as an active listening model through a People Business Partner assigned to each department, ensuring that all employees have direct access to support and continuous guidance.

Employee engagement is also ensured through exit interviews (offboarding), in which we collect feedback on the employee experience, identifying opportunities for improvement in the company and its people management policies.

We fully respect the rights of employees to organize and engage in collective bargaining, ensuring they have the freedom to join unions and participate in negotiations, in accordance with ILO principles.

To monitor employee well-being and satisfaction, we conduct regular surveys on psychosocial risks, as well as awareness campaigns, webinars, and other training initiatives. These actions are essential to ensure that we remain aligned with our employees' needs and maintain a positive and safe work environment.

NOS maintains a continuous commitment to improving working conditions, ensuring that all employees feel respected, safe, and empowered to grow within the company.

Additionally, we conduct risk mapping actions, which involve ongoing evaluations of employees' work activities and well-being, considering aspects such as discrimination, harassment, occupational safety, and excessive working hours. This monitoring is carried out through our Occupational Health and Safety area, the People Business Partner function available to all departments, and the direct involvement of employees in identifying vulnerabilities and areas for improvement throughout their journey at NOS. We have developed preventive programs to raise awareness about well-being and work-life balance.

As part of our commitment to transparency, NOS undergoes internal and external audits that regularly review the implementation of these practices. Additionally, the company publishes public reports, where we disclose the actions taken and results achieved in the implementation of these policies, ensuring a continuous commitment to improvement and social responsibility.



Diversity and Inclusion

NOS has implemented a set of policies and initiatives aimed at eliminating discrimination, including harassment, and promoting equity, diversity, and inclusion. These include:

- Code of Ethics: Applicable to all employees, partners, and suppliers, this code defines fundamental ethical principles and rules.
- Code of Conduct for the Prevention and Combat of Workplace Harassment: Establishes concrete measures to prevent and address workplace harassment, ensuring a safe environment for all.
- Commitment to Diversity and Inclusion Statement: Formalizes NOS's commitment to a diverse, fair, and equitable work environment.
- Gender Equality Plan: Developed annually, it reaffirms NOS's commitment to fairness in treatment and opportunities, promoting concrete actions for gender inclusion.
- Mandatory e-learning training on the Code of Ethics: Covers topics such as harassment, corruption, and fraud, clarifying whistleblowing channels and reinforcing the company's ethical commitment. It is part of the onboarding process for new employees.
- Ethics Committee: Monitors compliance with ethical standards, manages the whistleblowing channel, and provides clarifications on company policies. To strengthen trust in internal processes, it promotes "Let's Talk About Ethics" sessions, addressing everyday ethical dilemmas and challenges.

In 2024, NOS reinforced its commitment to Diversity & Inclusion, implementing initiatives that reflect the company's strategy to promote equity and representation in the workplace. NOS applies its diversity and inclusion policies through specific procedures, ensuring that discrimination is prevented, mitigated, and corrected whenever detected. In addition, the company is committed to continuously fostering diversity and inclusion. Among the key initiatives and procedures implemented, the following stand out:

- Inclusive Recruitment Awareness: We promote specific initiatives to enhance the hiring of people with disabilities, ensuring a more accessible and equitable recruitment process.
    - Neurodiversity Program: In partnership with Specialisterne, we have recruited, trained, and integrated individuals on the autism spectrum, providing a work environment adapted to their needs and fostering their skill development.
    - NOS Cinemas Project in Partnership with Valor T: This initiative aims to integrate individuals with different cognitive and/or physical conditions into the NOS Cinemas teams, promoting inclusion through employment.
- 2025 Gender Equality Plan: We launched a set of strategic measures to ensure gender equity across all areas of the organization, fostering a more inclusive and balanced culture.
- Partnership with APPDI (Portuguese Association for Diversity and Inclusion): We renewed our partnership with APPDI, earning the Diversity Seal and an Honorable Mention, recognizing our ongoing commitment to workplace diversity.
- Distinctions and Recognitions: NOS was recognized with the Diversity Seal, highlighting its inclusive content offerings on NOS Campus and the equitable composition of training cohorts. Additionally, we received an Honorable Mention for the Hiring Manager Handbook, a guide supporting leaders in adopting inclusive recruitment practices.
- Awareness Initiatives and Actions: We launched the Inclui conNOSco podcast and the Inspiring Talks sessions, where we discuss topics related to diversity and inclusion, encouraging reflection and experience sharing. Additionally, we promote workshops and webinars focused on gender equality, neurodiversity, and disability inclusion.
- Initiatives for Young Women in STEM: We developed programs to attract and support young women in Science, Technology, Engineering, and Mathematics (STEM), such as Engenheiras por 1 Dia, NOS in STEM Labs, and workshops on self-promotion and leadership, encouraging their participation and advancement in these fields.
- Prevention and Identification of Discrimination: We implement effective mechanisms to detect discriminatory behaviors, ensuring an inclusive work environment. If cases of discrimination are identified, NOS immediately adopts corrective measures, which may include disciplinary actions, psychological support, or awareness programs.
- Training and Capacity Building: NOS invests in continuous training for employees and leaders, addressing topics such as harassment, discrimination, and inclusion. Workshops, webinars, and e-learning programs are conducted to raise awareness and reinforce a culture of respect and understanding within the organization.
- Continuous Monitoring and Evaluation: NOS carries out constant monitoring of its diversity and inclusion policies and practices through internal surveys, audits, and performance indicators, assessing the impact of its initiatives and adjusting them as needed.

By reinforcing its vision of an inclusive and equitable workplace, NOS ensures that diversity and equal opportunities are core pillars of its organizational culture. These actions strengthen our inclusion strategy, guaranteeing a fair, representative, and accessible professional space, with a special focus on integrating vulnerable workforce groups.

Safety, health, and well-being

(S1-1_09) NOS ensures a safe and balanced work environment for employees, suppliers, and partners, promoting emotional well-being and preventing incidents and occupational illnesses.

These elements form a fundamental basis for maintaining attractive working conditions, supporting the ambition of positioning NOS as the best company to work for.

Occupational health and safety management

- **Occupational health and safety management system aligned with ISO 45001**

NOS Comunicações, S.A. has implemented a certified Occupational Health and Safety Management System (OHSMS) since 2015, in accordance with ISO 45001. This certification primarily covers Products and Services in the Corporate market segment. However, health and safety management processes and procedures are applied across the entire Group, ensuring alignment with the principles of the standard throughout the organization.

As a result, NOS's approach impacts all employees, as well as partner employees who work at our facilities or infrastructures occupied and/or managed by the company.

NOS has an Occupational Health and Safety (OHS) Policy, integrated into the company's Sustainability Policy, reaffirming its commitment to providing a safe and healthy work environment, preventing risks, injuries, and incidents for all employees, suppliers, and partners.

This policy aligns with the principles of ISO 45001, the international reference standard for occupational health and safety management, ensuring continuous improvement in working conditions and the reduction of occupational risks.

- **Risk management enhanced by a more systematic approach to protection system management**

Risk management is a fundamental pillar of NOS's approach to occupational health and safety. To ensure a safe working environment, the company implements programs for workplace safety monitoring, promotes regular training for accident prevention, and conducts internal and external audits to ensure compliance with Occupational Health and Safety (OHS) standards. In the event of any physical or mental health complaints from an employee, the Occupational Health and Safety team immediately arranges a medical consultation, allowing for a quick assessment of the employee's health condition and the definition of any necessary corrective measures.

Risk management is embedded in NOS's corporate governance, based on the company's Business Risk Model, which structures the identification, mitigation, and monitoring of key risks, including those related to employee health and safety. To reinforce this commitment, NOS conducts periodic audits of its certified management systems, including ISO 9001 (Quality), ISO 14001 (Environment), ISO 45001 (Occupational Health and Safety), ISO 27001 (Information Security), and ISO 20000 (IT Service Management).

In the identification of occupational health and safety hazards and risk assessment, the main categories of risks identified are psychosocial, ergonomic, physical, mechanical, electrical, and those associated with work-related travel. Based on this analysis, specific action plans have been defined and implemented to mitigate these risks.

Additionally, NOS regularly monitors workplace conditions concerning air quality, noise levels, lighting, and climate control, ensuring a suitable and comfortable work environment.

The annual occupational health and safety survey, conducted in compliance with legal and certification standards, serves as a key moment for gathering direct feedback from employees and supporting the continuous improvement of processes. The analysis of the survey results

serves as a basis for strategic decision-making in the area of occupational health and safety management.

As part of its commitment to ensuring the safety and well-being of its partners, in addition to complying with legal Occupational Health and Safety (OHS) requirements, NOS is also an ISO 45001-certified company for Occupational Health and Safety Management Systems (OHSMS). Within the scope of this certification, in 2024, NOS surveyed employees of external suppliers (partner entities) regarding the Occupational Health and Safety conditions provided in company buildings.

Since 2021, NOS has been strengthening its management of Personal Protective Equipment (PPE) and Collective Protective Equipment (CPE). In 2023, the company completed the implementation of the PPE and CPE Management Procedure, published on the Integrated Management System (SGI) Portal. This procedure systematizes the entire lifecycle of the equipment, from procurement, distribution, and use to return and maintenance, ensuring more efficient and optimized management.

Within the PPE project, NOS developed and implemented specialized training programs to reinforce workplace safety best practices. In 2022, mainland Portugal hosted the “Safety Principles for Working at Heights” sessions, equipping employees with knowledge of safe behaviors and attitudes, selection and correct use of protective equipment, and understanding of verification and maintenance procedures for PPE. Continuing this initiative, in 2023, a similar training session was held in the Azores on "Working at Heights," reinforcing knowledge on the proper selection and use of equipment, assessment of environmental conditions, and safety procedures for different work scenarios.

Additionally, in the field of occupational health and safety, NOS has also developed, implemented, and published on the SGI Portal the Electromagnetic Field (EMF) Radiation Control Procedure. This document establishes the methodology for monitoring EMF levels, ensuring the recording of measurements, the identification of threshold values, and the implementation of mitigation measures whenever necessary.



To operationalize this procedure, safety representatives were appointed for the registration and management of incidents, receiving specific training to ensure compliance with requirements. Furthermore, dosimeters were made available to enable continuous monitoring of EMF exposure. All employees exposed to this type of risk participated in the "Prevention in EMF Radiation" training, covering types of radiation, their sources, health impacts, legal requirements, and procedures for recording measurements and incidents.

- Prevention and emergency management

As part of physical safety measures, NOS provides e-learning training on "Fire Safety" for new employees, ensuring they know how to act in prevention and emergency situations within company buildings.

Since 2014, NOS has maintained dedicated emergency response and evacuation teams for each building (Lisbon, Porto, and the Islands). In 2023, these teams were reorganized and underwent training to familiarize themselves with preventive measures and emergency response protocols specific to each facility.

Regarding first aid response, in 2023, NOS trained new teams to identify the most common medical emergencies in non-hospital environments and provide first aid in life-threatening situations until medical teams arrive. To enhance the company's response capability in cases of cardiac arrest, NOS aimed to install an Automated External Defibrillator (AED) in each building. These teams were trained in performing Basic Life Support (BLS) techniques using an AED on individuals experiencing cardiac arrest.

In 2024, approximately 50 employees completed an Emergency Team Training Program with the Red Cross, where they learned about the 112 emergency line, basic life support, radio communications and security posts, emergency plans, fire response, psychological first aid, and victim mobilization. These skills were put into practice in a simulation drill.

- Healthcare services

Employees can easily and conveniently schedule Occupational Health consultations and medical exams at NOS's three main office buildings (Campo Grande, Expo, and NorteShopping). This process is essential for ensuring compliance with both legal and regulatory obligations while also promoting personal health management. In the interest of protecting employees and the wider community, NOS organizes an annual seasonal flu vaccination campaign.

- Health and well-being

In 2023, NOS continued expanding the reach and impact of the NOS VITA Health and Well-being Program, structured around three core dimensions—physical health, emotional health, and social health.

Reflecting its personalized and holistic approach, NOS developed various initiatives aimed at inspiring healthy choices, empowering behavioral change, and facilitating employees' access to activities that promote health and well-being.

Physical health focuses on three key areas: nutrition, body, and movement. Within this pillar, the NOS VITA Health and Well-being Program played a significant role in celebrating NOS's 10th anniversary. The company combined this celebratory moment with the promotion of physical health by organizing a 10-kilometer run and a 5-kilometer walk, open to all employees.To further promote physical well-being, NOS also hosted webinars on proper posture and on nutrition and anxiety, addressing both physical and mental health.

Additionally, in a preventive approach, NOS organized an in-person first aid training course, with open registration for all employees.

Social health is structured around three dimensions: personal, community, and family. This pillar of the program supports work-life balance through initiatives such as webinars on financial literacy and the psychology behind parent-teen relationships. As part of its commitment to family well-being, NOS grants special leave to parents on their child's first day of school, an initiative that has been in place since 2023. The community aspect of social health was reflected in a blood donation drive, held at NOS offices in Lisbon and Porto, in partnership with the Portuguese Institute of Blood and Transplantation.

Emotional health is perhaps the most complex pillar, encompassing three key areas: mind, recovery, and energy. Emotional balance and mental well-being are increasingly prioritized by the leadership team. In 2024, NOS launched a leadership training program to equip senior and mid-level managers with psychological first aid skills. While NOS is committed to maintaining a positive work environment, the ability to respond effectively to crises and accidents is critical. The training was designed to reduce stress symptoms associated with psychological crises, whether triggered by personal, professional, or accidental circumstances. A total of 175 leaders were trained in psychological first aid, covering NOS offices in Lisbon, Porto, Madeira, and the Azores. Additionally, in the area of psychological support, NOS hosted a webinar for all employees focused on self-care and peer support, reinforcing the company's commitment to mental well-being in the workplace.



Emotional health support remains a priority at NOS, with mental health coverage included in the company's health insurance policy for all employees. Additionally, employees continue to have access to online programs focused on nutritional guidance, smoking cessation, better sleep, and parenting consultations. From a strategic perspective, NOS maintained its commitment in 2025 to the Workplace Mental Health Pact, reinforcing its dedication to fostering a mentally healthy work environment.

While health and well-being are structured into three dimensions, they function as a holistic concept, where each dimension must be actively developed, and their interconnections must be strong and balanced. To highlight the interconnected nature of health, NOS dedicated October 2024 as Health Month, organizing initiatives across all three health dimensions. This included webinars on longevity, general health and optometric screenings, and the publication of awareness articles covering topics such as mental health, sustainable nutrition for performance, and menopause.

Emotional balance and mental health continue to be a key focus for the management team, given their complexity and often subtle impact. As part of the annual update to NOS's health insurance policy, mental health coverage was extended to all employees. Additionally, NOS introduced special leave for parents to accompany their children on the first day of school, reinforcing its commitment to work-life balance. Believing that organizational change must start at the top, NOS launched a pilot leadership program, designed as an eight-week journey of learning and self-awareness, aimed at developing a more sustainable leadership approach with emotional balance as a core component. On a broader strategic level, NOS formalized its commitment to mental health in the workplace by signing the Workplace Mental Health Pact, reinforcing its position as a company that prioritizes employee well-being at every level.

1.3.3.1.3 Engagement with employees and workers' representatives on impacts (S1-2)

(S1-2_01 / S1-2_06) NOS is committed to ensuring a structured and ongoing dialogue with its employees, making sure that their needs and expectations are reflected in the company's strategic decisions. This commitment is materialized through various active listening mechanisms, direct communication channels, and engagement practices that promote a transparent, inclusive, and collaborative work environment.

Continuous assessment of the employee experience is a priority, conducted through the Climate Study, an annual survey that gathers comprehensive feedback on various dimensions of the company, including well-being, leadership proximity, and workplace environment. The results of this survey serve as strategic input for the People & Organization Department, ensuring that the initiatives implemented effectively meet employees' expectations. Over recent years, the Climate Study results have shown a positive trend in almost all key areas, validating the effectiveness of the implemented dialogue methodologies.

(S1-2_02 / S1-2_03 / S1-2_07) The dialogue with employees occurs continuously and without a rigid calendar, fostering a fluid and open communication process. There is no fixed schedule or predefined agenda for these interactions, including negotiations with workers' representatives. The goal is to maintain contact whenever necessary and whenever employees feel the need, ensuring close support tailored to their needs. However, NOS ensures the Climate Study is conducted annually in June, regardless of the company's or market's context.

Beyond the Climate Study, NOS has specific employee support structures in place to ensure close and accessible communication. The "Employee Support" function is exclusively dedicated to assisting, engaging, and providing guidance to employees, while the People Business Partners team serves as the primary point of direct contact for all NOS employees. These professionals ensure that every individual in the organization has a reference point to clarify doubts, voice concerns, or suggest improvements. These roles have been particularly valuable in supporting more sensitive or challenging situations, ensuring timely and appropriate assistance.

Additionally, NOS maintains a structured and constructive relationship with trade unions and other labor representatives, promoting social dialogue and ensuring respect for freedom of association and collective bargaining. In the case of the NOS Cinemas business, a collective labor agreement is in place, regulating the relationship between the company and employee representatives, safeguarding workers' rights and interests.

Employee feedback and ongoing satisfaction monitoring are an integral part of NOS's people management model. The results of internal satisfaction indexes, including NOS's Recommendation Index as a Great Place to Work, are analyzed in dedicated forums that involve top management and first-line leadership. This process allows the company to adjust talent management strategies and implement continuous improvement actions, reinforcing the alignment between corporate goals and employee expectations.

NOS employs a multichannel approach to internal communication, adapting contact methods to objectives and employee needs. In addition to in-person interactions, NOS leverages digital internal channels, such as the corporate portal, newsletters, and internal events, as well as specialized tools for organizational climate studies and internal discussion forums.

(S1-2_04) The operational responsibility for ensuring this dialogue takes place is assigned to:

- Chief Resources & Human Officer (CRHO)
- People & Organization Director

The combination of these practices ensures that NOS maintains a close, structured, and effective dialogue, giving employees an active voice within the organization and translating their experience into a positive, inclusive, and productive work environment.



1.3.3.1.4. Processes to remedy negative impacts and channels for employees to raise concerns (S1-3)

(S1-3_01) NOS takes a proactive and human-centered approach to ensure that employees have access to effective mechanisms to express concerns, report negative impacts, and seek redress when necessary. Whenever we identify that our actions may have caused or contributed to a material negative impact on employees, we implement corrective measures tailored to each case, ensuring a safe, inclusive, and transparent work environment.

If an employee feels they do not have the necessary flexibility to manage family or personal priorities, NOS carefully reviews the case, listening to their needs and proposing balanced solutions, such as adjustments in working hours or role reorganization, whenever feasible. In cases requiring additional guarantees, formal contract addendums may be established to safeguard agreed rights.

The effectiveness of these measures is regularly evaluated through direct employee feedback, collected via the Climate Study, People Business Partners, and the Employee Support Area, ensuring that the solutions implemented have a positive and sustainable impact. At NOS,

flexibility and dialogue are essential to fostering a balanced work environment and supporting employees at all stages of their professional journey.

Communication channels

(S1-3_02) NOS provides various accessible and confidential channels for employees to express concerns, report irregularities, or seek clarification. These mechanisms reflect our commitment to transparency, integrity, and respect for labor rights. Among the main available channels, the following stand out:

- Ethics Channel and Whistleblowing Channel: Provides a secure and confidential means for reporting any irregularities, protecting the identity of whistleblowers.

More information in section "1.3.4.1.1. Policies (G1-1)".

- Human Resources Directorate (pessoas.organizacao@nos.pt): Available to support employees at any stage of their journey at NOS.
- Integrated Management System for Quality, Environment, and Occupational Health & Safety (arc.riscocompliance@nos.pt): Provides support on topics related to the Integrated Management System across Quality, Environment, and Occupational Health & Safety.
- Data Protection Office (dpo.privacidade@nos.pt): Responds to privacy-related inquiries and manages data protection concerns.

These channels are widely disseminated through the corporate intranet, ensuring that all employees are aware of and can use them whenever necessary.

Availability and management of workplace communication channels

(S1-3_05 / S1-3_06 / S1-3_07) All NOS employees have access to communication channels from the moment they join the company, where they are informed about their operation and importance. This initial communication is reinforced through ongoing awareness initiatives, ensuring that, regardless of tenure, all employees know where and how to seek support.

The management of communication channels follows a structured and transparent process, ensuring that all inquiries, complaints, and grievances are handled impartially and fairly. Submissions can be made anonymously and confidentially, with records including submission date, problem description, and involved parties (if identified). A responsible party is assigned to monitor each case's resolution within the established deadlines.

The effectiveness of these channels is assessed through:

- Performance indicators, such as average response time, number of resolved cases, and recurrence rates.
- Periodic audits, ensuring compliance with internal policies and international standards.
- Climate Study, which includes questions about employees' perception and accessibility of these channels, allowing for the identification of improvement opportunities.

Protection against retaliation and confidentiality guarantee

(S1-3_08 / S1-3_09) NOS enforces strict non-retaliation policies, ensuring that all employees can access the available channels without fear of reprisals. All processes are managed by a

specialized and independent team, guaranteeing the protection of users' identities and the integrity of the shared information.

Additionally, during exit interviews, conducted by People Business Partners, employees have the opportunity to express concerns and suggestions confidentially, as well as respond to an anonymous and confidential survey, reinforcing NOS's commitment to transparent dialogue until the final stage of the employment relationship.

The Whistleblowing Communication Regulation ensures that all reported situations are handled promptly, fairly, and in alignment with ethical principles. This mechanism strengthens NOS's commitment to confidentiality, impartiality, and whistleblower protection, ensuring that employees trust the available processes for reporting concerns.

The combination of these practices ensures that NOS maintains a close, structured, and effective dialogue with its workforce, fostering a work environment based on transparency, fairness, and respect for every employee's rights.



1.3.3.1.5. Management measures for our employees (S1-4)

(S1.MDR-A_01-12) NOS adopts a structured approach to workforce management, promoting the attraction, retention, and development of employees. The implemented measures aim to mitigate material risks, such as dissatisfaction, lack of competitiveness, and inequalities, while also leveraging opportunities related to professional development and organizational well-being. The effectiveness of these measures is monitored through specific indicators, ensuring a positive and sustainable impact.

- Salary review

NOS conducts annual salary reviews, ensuring that employee salaries remain fair and competitive. This initiative aims to maintain wage adequacy by considering factors such as inflation adjustments, market benchmarking, minimum wage updates, and internal promotions. This action covers all NOS operations and applies to all employees in mainland

Portugal and the islands, ensuring that the salary policy keeps pace with market developments and reflects the company's commitment to valuing its professionals. The objective is to enhance fairness and NOS's attractiveness as an employer, mitigating risks such as dissatisfaction and talent loss, while promoting motivation, retention, and recognition.

- Skills development

Skill development is a key pillar for personal and organizational growth, directly contributing to talent attraction, retention, and appreciation. NOS is committed to continuous learning, ensuring that its team is prepared for industry challenges and future technological advancements. Employee training is delivered through NOS CAMPUS, NOS's corporate university, which focuses on four strategic areas: Leadership & Management, Technical & Digital, Technological and Transversal skills. These training areas are fully aligned with NOS's organizational strategy and culture, enabling employees to develop critical skills for individual and collective growth.

In 2024, NOS CAMPUS strengthened its training offerings, focusing on leadership development, technical training, and digital transformation. The most notable programs include:

- Leadership development, preparing managers and leaders to tackle organizational and strategic challenges.
- Enhancement of performance and development models, through various training initiatives, fostering a culture of continuous feedback and growth.
- FAAST - Advanced Analytics Program, reinforcing advanced data analysis skills and introducing Generative AI concepts.
- Cloud Training, boosting expertise in cloud computing technologies.
- Training as a tool for aligning values and risk management, promoting ethical and compliance practices.

Beyond upskilling, NOS encourages a lifelong learning culture and invests in reskilling, enabling employees to acquire new competencies to keep up with industry changes. Although some training is targeted at specific teams, such as emergency response and first aid teams, most initiatives are broadly applicable to all employees. Additionally, ad hoc training is offered to support the implementation of new processes, such as electromagnetic radiation awareness and working at heights training in the Azores. NOS also provides training modules to suppliers and partners, reinforcing the qualification of its value chain and promoting a broader learning ecosystem.

Trainings related to potential organization-wide risks

Sustainability

E-learning training, structured into three series, covering environmental, social, and governance aspects aligned with NOS's sustainability policy (e.g., Energy & Climate, Waste & Circular Economy, Electromagnetic Radiation, etc.).

Ethics at NOS

E-learning training designed to reinforce the ethical commitments that all NOS employees must uphold in their daily activities. It presents the principles outlined in the NOS Code of Ethics and the associated reporting mechanisms (e.g., whistleblowing channel).

For better understanding, it includes scenarios and examples of appropriate and inappropriate behaviors related to various topics covered in the code (e.g., harassment, corruption, fraud, etc.).

Security and Privacy

E-learning training, structured into three stages, covering NOS's existing policies on security and privacy.

Safety for All

General e-learning training on Workplace Safety, Health, and Well-being conditions.

Fire Safety

E-learning training providing an introduction to available fire prevention measures and best practices in case of fire.

Emergency Teams

In-person training, offering an introduction to the roles and responsibilities of emergency response teams and their operational procedures.

First Aid

In-person training, equipping participants with basic life support skills to effectively respond in medical emergency situations.

- Complementary training and advanced programs

Beyond the training offered through the NOS CAMPUS catalog, the company provides additional training programs, tailored to address the specific needs of employees:

- Extra-catalog training, allowing any employee to request customized training through the internal platform.
- Advanced training, enabling employees at different levels of seniority to apply for specialized programs.

The continuous investment in skill development has led to a significant increase in training hours.

In 2024, a total of 32,120 training hours were recorded, corresponding to an average of 18 training hours per employee. This positive trend was driven by the strengthening of the NOS CAMPUS training offering, the development of cross-functional training projects, and the return to normal operations, enabling training sessions to take place without restrictions throughout the year.

This initiative applies to both upstream activities and NOS's own operations, covering all employees in mainland Portugal and the islands. The annual training plan is implemented in different phases throughout the year, ensuring ongoing alignment with employee and market needs. NOS invests approximately €1 million annually in professional development, reinforcing its commitment to employee growth and organizational competitiveness.



- Development and Performance Model

NOS has implemented a structured development and performance model, ensuring that all employees play an active role in their career progression. This model includes key aspects such as performance evaluation, internal mobility, career progression and professional development.

NOS implements a structured development and performance model, ensuring that all employees play an active role in their career progression. This model covers essential topics such as performance evaluation, internal mobility, career progression, and professional development, guaranteeing that each employee has the necessary tools to grow within the company. The company provides a dedicated platform, accessible to both managers and employees, allowing them to track progress, set objectives, and structure individualized development plans. This approach fosters growth aligned with both employee aspirations and organizational needs.

This initiative applies to NOS's own operations, covering all employees in mainland Portugal and the islands. The plan is structured annually and implemented in different stages throughout the year, ensuring that NOS's talent development strategy remains aligned with business objectives and workforce needs.



- NOS Alfa trainee program

With the goal of enhancing the employee experience, NOS has strengthened its focus on developing young talent and promoting internal growth opportunities. In 2024, the company welcomed 48 new trainees into the NOS Alfa program, marking the highest number since the initiative began, and hosted 94 curricular and summer internships, reinforcing its position as a benchmark in attracting and developing young talent.

The NOS Alfa Trainee Program, which lasts for 12 months, offers participants an immersive experience, rotating through two business areas, complemented by a structured mentoring program and personalized training. The program has evolved continuously, aligning with business needs and the changing dynamics of the job market.

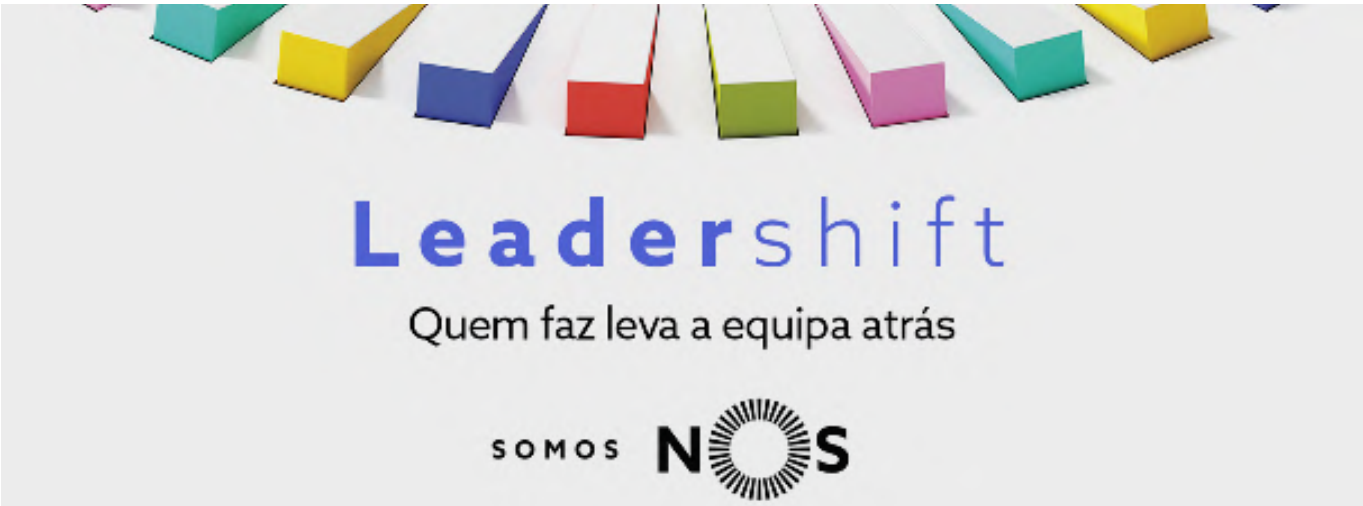
Attracting young talent

4.9

Overall evaluation, on a scale from 1 to 5, of the 2024 edition of the NOS Alfa Trainee Program

- Internal mobility program

NOS also maintains its Internal Mobility Program, allowing employees to explore new roles, acquire new skills, and gain greater visibility within the organization. This initiative enables horizontal career moves, fosters a broader understanding of the business, and creates new career advancement opportunities. Since 2020, 793 mobility actions have been completed, with an 8.6% mobility rate across the organization in 2024, demonstrating strong engagement and the positive impact of this strategy.



- Leadershift program

Leadership development is another key strategic pillar for NOS, playing a crucial role in talent retention and the company's cultural transformation. To this end, the company created the Leadershift Program, designed in 2022 to empower NOS leaders to mobilize teams effectively, ensuring they are prepared to foster a motivating, emotionally balanced, and efficient work environment. In 2024, the program was enhanced with various highly customized training initiatives, providing continuous support for cultural change and the organization's evolution.

- Employee benefits

NOS offers a structured benefits and partnerships program, designed to enhance the company's competitiveness in the market while meeting the diverse needs of all employees.

This program ensures a flexible and adaptable model, allowing employees to select the benefits that best suit their profiles and requirements.

The initiative applies to NOS's direct operations, covering all employees in mainland Portugal and the islands. The plan is reviewed annually and structured across multiple phases throughout the year, ensuring continuous updates to available options and alignment with employee expectations.

- Collective agreement for NOS Cinemas

NOS ensures a collective labor agreement specifically for the NOS Cinemas business, guaranteeing fair and competitive wages for all employees in this sector.

This agreement aims to ensure salary adjustments, taking into account key factors such as inflation correction, market competitiveness, minimum wage updates, and internal promotions.

The initiative applies to NOS's direct operations, covering all NOS Cinemas employees in mainland Portugal and the islands. The annual salary review ensures that conditions remain aligned with industry standards, promoting employee recognition and career development.

- Communication and celebration initiatives

NOS promotes a series of initiatives and celebration moments designed to strengthen the organizational culture and engage all employees. These actions aim to enhance the sense of belonging, foster team cohesion, and align employees with the company's values and mission.

The company invests in internal events, recognizing the importance of communication and recognition as essential elements for employee motivation and engagement. These moments reflect NOS's commitment to valuing its people and creating a dynamic and positive work environment.

This initiative applies to NOS's direct operations, covering all employees in mainland Portugal and the islands. The plan is reviewed annually and structured into several moments throughout the year, ensuring that communication and celebration activities take place in a continuous and impactful manner.

- NOS Vita – Well-being initiatives

NOS implements the NOS Vita program, designed to promote quality of life, physical and mental health, and ensure adequate working conditions, encouraging a healthy work-life balance.

This program includes a set of initiatives aimed at enhancing employee well-being, creating a healthier, more productive, and motivating work environment. The approach focuses on prevention and health promotion, as well as on creating conditions that enable employees to perform their roles in a balanced and sustainable way.

The initiative applies to NOS's direct operations, covering all employees in mainland Portugal and the islands. The plan is reviewed annually and structured into various moments throughout the year, ensuring that well-being actions are continuously promoted with significant impact.

- Diversity and Inclusion

NOS implements a structured diversity and inclusion policy, raising awareness and promoting best practices in equal opportunities, multiculturalism, gender equity, age inclusivity, and the integration of people with disabilities.

This policy ensures that NOS fosters a representative, respectful, and inclusive work environment, where all employees have equal opportunities for development and career progression. Through the implementation of strategic initiatives, NOS actively promotes diversity and inclusion, reinforcing its commitment to a fairer organizational culture.

In the reporting year, this policy has already led to national and international recognition for NOS, positioning the company as a sector benchmark. Moreover, it has successfully placed these topics at the center of the company's workforce agenda, driving significant cultural change.

This initiative applies to NOS's direct operations, covering all employees in mainland Portugal and the islands. The plan is reviewed annually and comprises various moments throughout the

year, ensuring a continuous and evolving approach to promoting diversity and inclusion in the organization.

- Employee surveys

NOS conducts regular workforce surveys, ensuring continuous monitoring of employee perceptions, challenges, and needs. These surveys serve as the primary tool for measuring impacts, risks, and opportunities, allowing the company to adjust and refine its talent management and organizational culture strategies.

The structured feedback collection process helps identify areas for improvement, ensuring that NOS's policies and initiatives align with employee expectations and priorities. The results of these surveys are analyzed systematically and serve as an input for defining action plans that enhance employee engagement and experience.

This initiative applies to NOS's direct operations, covering all employees in mainland Portugal and the islands. The plan is reviewed annually, ensuring that these surveys are conducted in a consistent and impactful manner.



Contribution of actions to NOS's goals and targets

(S1-4_01 / S1-4_02 / S1-4_04 / S1-4_07 / S1-4_05 / S1-4_09) All the actions described above, both those already implemented and those planned for the future, have a direct or indirect impact on achieving NOS's goals and targets for people management. These initiatives were defined based on the company's business strategy and on workforce consultation, ensuring that the main priorities identified are properly addressed. The goal is to mitigate risks and maximize opportunities related to well-being, development, and talent retention.

NOS's action plan is broad enough to apply to the entire company workforce, including employees affected by material impacts. However, for specific cases, personalized solutions are applied, such as coaching support, individualized and tailored training, and workspace adaptations to accommodate specific needs. These actions ensure that all situations are addressed in an inclusive and tailored manner, promoting a healthy and equitable work environment.

NOS continuously monitors and evaluates the effectiveness of its initiatives, using both quantitative and qualitative indicators to measure progress against the defined objectives. Among the key indicators tracked are:

Employee training

32,120

total training hours provided to employees

Equal opportunities

34%

representation of women in management positions, including Directors and Managers (targeting 40% by 2025)

Work-life balance

76%

work-life balance index, an improvement from 70% in 2023

Best company to work for

85%

NOS recommendation index as a great place to work, up from 83% in 2023

All the previously described actions have been structured to prevent, mitigate, or correct negative impacts on NOS's own workforce. The set of implemented measures includes both preventive and structural actions (such as continuous training, skills development, and salary review) and personalized response actions for employees in more vulnerable situations. Additionally, NOS implements internal mechanisms to monitor the need for new corrective actions, ensuring close support for employees and their needs over time.

NOS identifies appropriate actions to address real or potential negative impacts on its employees through a structured listening and monitoring process. This includes annual surveys and internal inquiries, allowing for regular feedback collection on various organizational topics. Additionally, the continuous action of People Business Partners ensures direct contact with all NOS employees, acting as a privileged channel for active listening within teams. In the Cinemas business, the collective labor agreement guarantees ongoing dialogue between NOS and employee representatives, ensuring that needs and concerns are effectively monitored and addressed.

NOS has dedicated internal teams, either partially or fully, to managing material impacts on its workforce, ensuring structured and efficient follow-up. Among the key teams involved are:

- People Business Partners & Employee Support and Assistance Team, responsible for proximity to employees and resolving internal challenges.
- Investor Relations & Sustainability Team, focused on integrating sustainable and social practices into talent management strategies.
- Workplace & Facilities Team, responsible for physical working conditions and employee well-being in the workplace.
- People Services Team, which supports the management of administrative processes and employee support initiatives.

The involvement of these teams enables NOS to maintain an integrated and effective response, ensuring that its employees feel supported and that the company continues to evolve in the management of its workforce.



Metrics and targets

1.3.3.1.6 Targets related to managing material negative impacts, promoting positive impacts, and addressing material risks and opportunities (S1-5)

NOS has established a set of scheduled, results-oriented targets aligned with its 2025-2030 Sustainability Strategy, aiming to reduce negative impacts, enhance positive contributions, and mitigate material risks and opportunities related to its employees. These targets reinforce the company's commitment to fostering a more equitable, ethical work environment aligned with best corporate governance practices.

The targets were defined based on NOS's business strategy and internal consultation with employees and stakeholders, ensuring that people management strategies effectively address the organization's and its professionals' real needs. Monitoring is conducted annually using both quantitative and qualitative indicators, allowing for a continuous assessment of the effectiveness of the company's policies and initiatives.

Strategic targets and commitments

- Commitment: Ensuring equal opportunities, recognition, and transparent, merit-based evaluation for our people
    - Target: 40% of leadership positions held by women by 2030

NOS has set a target of achieving 40% female representation in leadership positions by 2030, reinforcing its commitment to inclusion and diversity, in line with the 2025-2030 Sustainability Strategy. To promote gender equity in management roles and foster a more inclusive and representative culture, the company implements female talent development programs, inclusive recruitment policies, and mentorship initiatives that support women's progression into leadership roles. This target applies to managers and directors, ensuring that female representation extends across all levels of management.

As of 2024, 34% of management positions were held by women, reflecting continuous progress toward this goal. To further accelerate this advancement, NOS engages employees through training and awareness campaigns on gender equality, promoting a workplace culture that values diversity and equal opportunities.

- Commitment: Acting ethically and responsibly with our employees, suppliers, and business partners, ensuring the highest standards of governance across our operations and supply chain.
    - Target: 100% of employees trained in ethics annually by 2030

NOS aims to ensure that 100% of its employees receive annual ethics training by 2030, reinforcing its commitment to an organizational culture rooted in integrity, transparency, and accountability. This initiative aligns with the 2025-2030 Sustainability Strategy and ensures that all employees understand and apply the ethical and regulatory principles that guide the company's operations.

To achieve this goal, NOS implements continuous training and awareness programs in ethics, covering topics such as business integrity, data protection, anti-corruption, and workplace harassment. Training is conducted through mandatory e-learning courses, interactive content on NOS's intranet, and open awareness sessions for all employees under the initiative "Let's Talk About Ethics," ensuring that ethics and responsible governance are embedded in the company's daily operations.

As of 2024, 97% of employees (excluding cinema operations staff) had completed the mandatory ethics e-learning course, demonstrating significant progress in this area. To further consolidate this commitment, NOS will continue reinforcing corporate ethics through regular initiatives, promoting a workplace culture based on trust, respect, and compliance with the highest international standards.

1.3.3.1.7 NOS team characteristics (S1-6)

The NOS Team

NOS follows best practices in designing its work policies and conditions, aiming to build a qualified, diverse, and motivated team. A team where each individual feels welcomed, safe, and empowered to take on responsible yet challenging autonomy, leveraging their talent and the training provided to contribute to the collective ambition. As of December 31, 2024, NOS had a total of 1,827 employees, comprising 58.6% men and 41.4% women. The majority of the

workforce (95%) was dedicated to the telecommunications business, while the remaining 5% were allocated to the cinema business.

The distribution by professional category reflects the expected structure in a technology sector company, where the workforce is predominantly technical. Technical roles account for 77% (including the categories of specialist, professional, and assistant), managers represent 19%, and directors 3%. The company operates entirely within the national market, with a higher concentration of employees in the Lisbon and Porto metropolitan areas, and the remaining workforce located in the autonomous regions. Since 2017, 100% of direct employees have worked full-time, and in 2024, all employees (100%) had permanent contracts, demonstrating NOS's commitment to sustainable employability policies. More than three-quarters of employees have a higher education degree (79% by the end of 2024), a foundational qualification that is further enhanced by the extensive training opportunities provided by the company.

Table 1: Employees by gender

Gender	Percentage of permanent employees
Men	58.6%
Female	41.4%
Other	0
Not declared	0
Total	**100%***

*Scope: All employees except cinema operational staff, internship contracts, and governing bodies.

Table 2: Percentage of Employees by Type of Contract, Broken Down by Gender

2024				
Female	**Male**	**Other***	**Not declared**	**Total**
Percentage of employees (headcount / FTEs)				
41.4%	58.6%	0	0	100%
Percentage of permanent employees (headcount / FTEs)				
41.2%	58.6%	0	0	99.8%
Percentage of temporary employees (headcount / FTEs)				
0.2%	0	0	0	0.2%
Percentage of non-guaranteed working hours of employees				
-	-	-	-	-

*Gender as self-identified by employees

Table 3: Percentage of employees by contract type, broken down by region

Mainland	Islands	Total*
Percentage of employees (number of FTEs)		
96%	4%	100%
Percentage of permanent employees (number of FTEs)		
95,8%	4%	99.8%
Percentage of temporary employees (number of FTEs)		
0,2%	0	0.2%
Percentage of employees with non-guaranteed working hours (number of FTEs)		
-	-	-

*Scope: All employees, excluding cinema operations staff, internship contracts, and governance bodies.

Table 4: Employee turnover rate

Turnover rate	8.81%

Scope: All presented values are actual figures, without estimates. The denominator used considers the headcount as of December 31, 2024. The number of employees is reported as the number of full-time equivalents (FTEs) at the end of the reporting period.

The employee turnover rate in 2024 remained in line with or below the values recorded over the past three years. Throughout the year, turnover remained stable, with no significant variations attributable to relevant factors.

More information on the number of employees is available in Note 33 of the Consolidated Financial Statements.

1.3.3.1.8. Diversity metrics (S1-9)

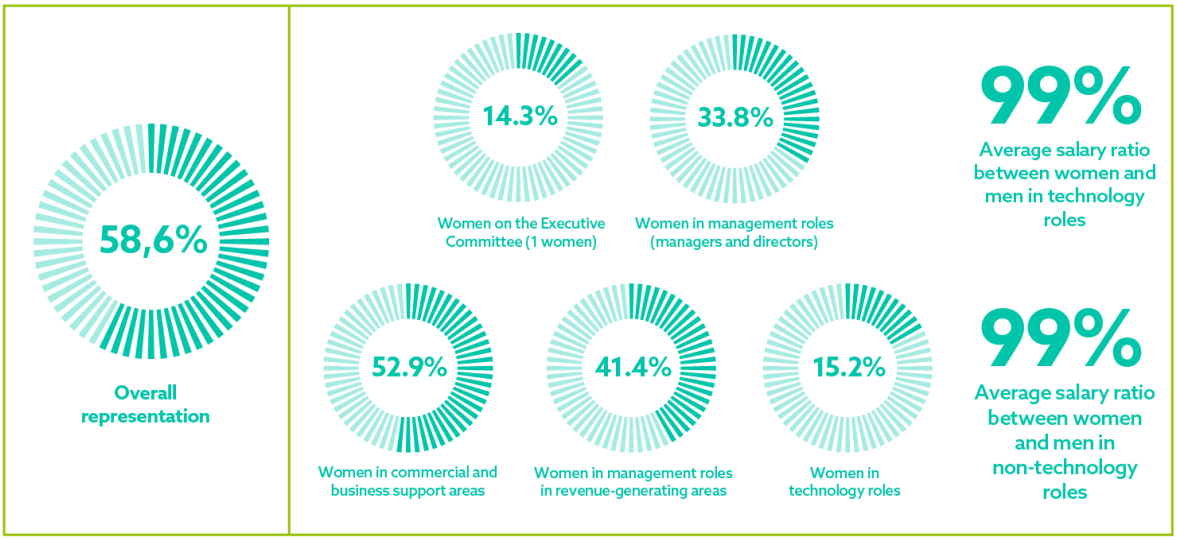
As a technology-based company, NOS operates in a sector that faces significant challenges regarding gender equality. However, the company is strongly committed to addressing this issue through the monitoring of diversity metrics and the implementation of a comprehensive set of initiatives aimed at fostering structural change.

As of December 31, 2024, women accounted for 34% of all management positions, including managers and directors. In terms of governance bodies, the Board of Directors included five women, representing 33% of the total 15 board members. Within the Executive Committee, one woman was part of the leadership team, making up 14% of the seven executive board members.

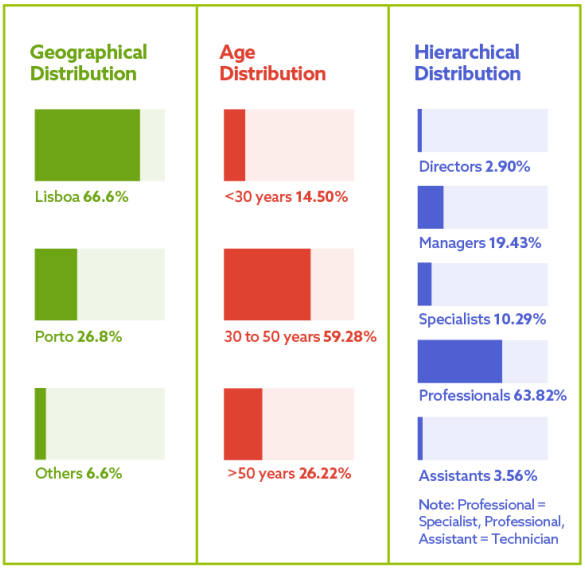
Female representation was also evident across different functional areas of the company. In commercial and business support areas, women accounted for 52.95% of the workforce. In management positions within revenue-generating areas, female representation stood at 41.38%, reflecting NOS's ongoing efforts to promote equal opportunities and career development. However, in technical roles, women comprised 15.17%, highlighting the ongoing challenge of achieving gender equity in the technology sector. To strengthen female participation in technical and innovation-focused projects, NOS has been implementing specific measures to encourage women to enter and thrive in these fields.

NOS regularly tracks gender pay equity indicators, ensuring an accurate assessment of gender equality within the company. By the end of 2024, the average salary ratio between women and men in both technology and non-technology areas stood at 99%. These data points support the implementation of concrete measures to address any remaining disparities and reinforce NOS's commitment to salary equity.

Women's Representation and Gender Pay Ratio



Geographical, age, and category distribution



Young Talent



The integration of employees with disabilities is already a reality at NOS and was further strengthened in 2024. The initiatives implemented to fulfill this commitment have been detailed above, demonstrating the company's ongoing dedication to fostering a more inclusive and accessible work environment for all.

Furthermore, NOS is committed to developing young talent, facilitating access to the job market through professional, summer, and curricular internships. In 2024, the company welcomed 128 interns, contributing to the training and skill development of future professionals.

NOS recognizes the impact of diversity and inclusion on the success of the entire team, particularly in the positive influence on people and the company culture. The well-being and satisfaction of employees, partners, and customers largely depend on making the organization an increasingly inclusive and diverse place. This commitment drives innovation, teamwork, motivation, productivity, and adaptability to change, ultimately contributing to the company's sustained growth.

Table 5: Gender distribution at senior management level

Salaried employees at senior management level (percentage)*				
Female	Male	Other	Not declared	Total
0.8%	2.1%	0	0	2.9%

Scope: Senior management includes employees who hold positions one or two levels below the board of directors and supervisory bodies, unless the company has adopted a different internal definition. At NOS, this category corresponds to Directors. If the company uses a different definition, this information must be disclosed along with the respective justification.

Table 6: Employee distribution by age group

Distribuição dos trabalhadores por faixa etária			
< 30 years old	30-50 years old	> 50 years old	Total
14.5%	59.3%	26.2%	100%

1.3.3.1.9 Fair wages (S1-10)

NOS's remuneration policy is guided by a set of principles aligned with both national and international best practices. The company regularly participates in benchmark studies on compensation and benefits trends, allowing it to assess and enhance the competitiveness of its model, adjusting it in line with market dynamics and top-performing companies.

Principles of NOS's Remuneration Policy
Equity Ensuring internal equity principles that support integration into a unified corporate culture.
Balance Maintaining a balance between fixed and variable components within the remuneration structure.
Simplicity Implementing a simplified remuneration structure that ensures clarity in communication and understanding among employees.
Flexibility Providing flexibility within defined rules to address differentiated situations, particularly in managing high-potential employees.
Performance Linking compensation to both individual and company performance in the short and long term.
Competitiveness Ensuring competitive remuneration levels necessary to attract and retain talent.

Aware of the importance of the compensation and benefits policy in attracting and retaining talent, NOS goes beyond the formal scope of remuneration, also investing in benefits with experiential and emotional impact. The objective is to provide a comprehensive compensation package that meets the needs of employees while simultaneously generating value for both the company and its workforce.

In addition to the remuneration package, NOS offers a variety of benefits, partnerships, programs, and initiatives tailored to the different generations within the company, enriching its employee value proposition. In 2023, this offering was further expanded with the extension of benefits and advantages under the NOS VITA Program, broadening the diversity of products and services available under special conditions, as well as the possibility of extending these benefits to employees' family members and friends.

NOS also promotes a flexible model for work-life balance, providing flexible entry and exit hours along with a set of leave entitlements and benefits, including:

- Leave on the employee's birthday
- Morning leave on the first day of the new school cycle for employees with children up to 15 years old
- Full-day leave on December 24 and half-day leave on the afternoon of December 31

Beyond these benefits, NOS ensures that all its employees receive an adequate salary in accordance with applicable reference criteria. The only mandatory reference for the company's workforce is the National Minimum Wage, and 0% of salaried employees earn below this benchmark salary.

1.3.3.1.10 Health and safety metrics (S1-14)

NOS ensures a safe and balanced working environment for employees, suppliers, and partners, promoting emotional well-being and preventing the occurrence of incidents and occupational illnesses. These elements form an essential foundation for maintaining attractive working conditions, supporting NOS's ambition to position itself as the best company to work for.

Table 7: Percentage of employees covered by the company's health and safety management system (%)

Percentage of workers covered by a health and safety management system	
Own workforce	100%
Salaried workers	100%
Non-salaried workers	0.00%

Table 8: Number of fatalities due to work-related injuries and illnesses

	Number of Fatalities	
Own workforce	Work-related hazards	0
	Work-related illnesses	0
Salaried workers	Work-related hazards	0
	Work-related illnesses	0
Non-salaried workers	Work-related hazards	0
	Work-related illnesses	0
Other workers	Work-related hazards	0
	Work-related illnesses	0
Total		**0**

Table 9: Number of recordable work-related accidents

Number of recordable work-related accidents	
Own workforce	3
Salaried workers	3
Non-salaried workers	0

Scope: For reporting purposes, all work-related accidents resulting in lost days that occurred during the reporting period and were reported to the People and Organisation Department are considered.

Table 10: Rate of recordable work-related accidents (frequency rate) | Work-related accidents (per 1,000,000 hours)

	Rate of recordable work-related accidents
Own workforce	0.89
Salaried workers	0.89
Non-salaried workers	0

Scope: Frequency rate = (number of work-related accidents occurring during the reporting period / number of hours worked) * 1,000,000

Table 11: Work-related Illnesses

	Work-related Illnesses
Salaried worker	0

Table 12: Lost days

	Work-related Illnesses
Salaried workers	52

Scope: The number of lost days includes all absences resulting from work-related injuries and fatalities, covering work-related accidents, occupational health issues, and fatalities due to illness among salaried workers. In the calculation of lost days, all calendar days are considered, including weekends and public holidays, regardless of whether the employee was scheduled to work on those days.

Table 13: Severity rate (or lost days index)

	Severity rate
Salaried workers	15.37

Scope: Severity rate = (number of lost days due to work-related accidents or occupational diseases during the reporting period / number of hours worked) * 1,000,000



1.3.3.2 ESRS S2 – Workers in the value chain

Strategy

1.3.3.2.1 Impacts, Risks, and Opportunities (ESRS 2 SBM-3)

NOS acknowledges that real and potential impacts on workers within its value chain stem directly from its strategy and business model, making responsible supply chain management essential. As such, the company is committed to ensuring that its network of suppliers and partners—both direct and indirect—aligns with its ethical, social, and environmental principles, guaranteeing not only the quality of products and services provided but also a continuously improving and more sustainable value proposition.

NOS's strategy defines priority products and services and the types of suppliers required to achieve its objectives, fostering strategic alignment through rigorous ethics and human rights criteria. To uphold this commitment, NOS requires its suppliers and partners to:

- Respect ethical principles and human rights: They must comply with the NOS Code of Ethics, the Code of Conduct for Corruption Prevention, the Sustainability Requirements for Suppliers and Partners, and the NOS Human Rights Policy.
- Promote the dissemination of these values: They are encouraged to communicate and enforce the same high standards throughout their own supply chains, regardless of geographic or social complexities.
- Ensure compliance with international human rights standards: Even in countries facing legal or social challenges, suppliers must uphold the rights outlined in the International Bill of Human Rights and International Labour Organization (ILO) conventions.

- Avoid the use of minerals from conflict zones or any raw materials associated with exploitative practices or human rights violations.
- Protect the environment and Indigenous peoples: Suppliers must secure free, prior, and informed consent from local communities before operating in certain areas and must minimize environmental impacts, particularly in protected areas or sensitive ecosystems.
- Guarantee decent working conditions: They must ensure fair remuneration, workplace safety, and compliance with applicable labor laws.

To reinforce the implementation of these principles, NOS has established monitoring mechanisms and corrective measures, including specific contractual clauses, regular audits, and secure, confidential reporting channels, enabling any irregularities to be reported and addressed effectively.

The identified impacts within the value chain inform and contribute to the continuous adaptation of NOS's strategy and business model. This commitment is reflected in the adoption of practices that ensure ongoing alignment with the company's sustainability and corporate responsibility principles, including:

- Active communication and collaboration with suppliers: NOS maintains regular dialogue with its direct suppliers, encouraging them to adopt policies and processes that align with its ethical principles. This collaboration aims to improve working conditions and promote sustainable practices across the entire supply chain.
- Regulatory compliance and adaptation: The company continuously adjusts to national and European legislation, as well as international standards—including the International Bill of Human Rights and ILO conventions. This alignment reinforces the integration of sustainability and corporate responsibility values into NOS's business model.
- Procurement Manual with supplier requirements: NOS has developed an internal Procurement Manual exclusively for its employees, outlining guidelines, recommendations, and rules for the responsible acquisition of products and services. This document ensures that the entire value chain follows directives that align with the company's internal policies.
- Impact of fiscal and wage policies: The state budget and its associated measures directly influence fiscal and wage structures, affecting lower-skilled roles and workers with lower salaries within the value chain. NOS closely monitors these developments to ensure fair and balanced working conditions for affected workers.

Workers in the value chain included in disclosures

All workers in the value chain who may be materially affected by the company's operations are included in NOS's disclosures. The inclusion criteria are exclusively based on the scope of the document, taking into account the nature of the operation and the contractual relationship between the parties. There is no arbitrary discrimination or exclusion based on factors unrelated to these criteria.

Types of workers in the value chain subject to material impacts

The workers in the value chain subject to material impacts include:

- Workers on NOS premises who are not part of the direct workforce: Maintenance technicians, cleaning staff, cooks, canteen operators, and other service providers.

These workers are directly impacted by the company's conditions and policies, despite not being formally integrated into its workforce.

- Upstream workers in the value chain: Professionals involved in the provision of essential services for NOS's operations.
- Downstream workers in the value chain: These workers may be affected by NOS's transparency policies and adoption of best corporate practices.
- Workers in partner entities or specific projects: Professionals engaged in joint activities with NOS, including those operating in shared companies or special-purpose entities associated with the reporting company.
- Vulnerable workers: Groups particularly exposed to negative impacts due to intrinsic characteristics or specific contexts, such as migrant workers, women, and young professionals.

The positive impacts mentioned extend to different categories of workers within the value chain. Workers in downstream entities in NOS's value chain can be directly influenced by the company's transparency policies and commitment to best practices.

Positive impacts and related activities

NOS's initiatives generate significant positive impacts for workers in its value chain, fostering improved working conditions, transparency, and best practices across its entire network of partners and suppliers.

- Improvement of working conditions in NOS workspaces
    - NOS adopts a hybrid and flexible work model, allowing value chain workers operating in its facilities to benefit from its spaces. To ensure a high-quality work environment, NOS workspaces adhere to best practices and occupational health and safety (OHS) requirements, including:
    - Ergonomically designed workspaces: In its three main buildings, work areas are equipped with fully ergonomic chairs that comply with OHS standards, along with freely available monitors to enhance comfort and productivity.
    - Comprehensive infrastructure: Employees have access to dining areas, outdoor spaces, collaborative common areas, and leisure zones across all office locations.
    - Mobility facilitation: Access to parking garages is available, subject to availability and a booking system.
- Promotion of transparency and capacity building
    - NOS fosters a culture of transparency and continuous improvement within its value chain, ensuring that its partners adopt fair policies aligned with its ethical principles. Key initiatives include:
        - Sharing insights on salary policies: NOS actively collaborates with its

partners to ensure that external workforce salary policies adhere to equity standards and fair remuneration practices.

- Training academies for external workers: The company offers training and development programs for key partners within its value chain, enhancing skills and promoting professional growth among supplier workforce members.

- Commitment to best practices in workforce management
    - All workers in the value chain are covered by the internal workforce management policies and best practices established by NOS. These guidelines ensure:
        - Transparency and fairness in employment relationships
        - Implementation of corrective measures in cases of human rights violations
        - Safe and accessible whistleblowing channels that enable the identification and mitigation of social and labor risks within the supply chain

NOS ensures that its strategy and business model not only take into account the impacts on its value chain but also actively contribute to improving working conditions, promoting sustainability, and protecting human rights. This integrated approach reinforces NOS's commitment to creating an inclusive, safe, and sustainable work environment, directly benefiting value chain workers and strengthening trust-based relationships with its partners.



Impact management, risks, and opportunities

1.3.3.2.2 Policies (S2-1)

(S2.MDR-P_01-06) NOS acknowledges that responsible supply chain management is essential to ensuring fair working conditions, respect for human rights, and a safe and inclusive environment for all workers involved in its operations, whether directly or indirectly. Our commitment extends beyond our own workforce, covering workers employed by our suppliers, partners, and service providers, ensuring that the values of equity, transparency, and sustainability are reflected throughout the supply chain.

NOS's policies for value chain workers have been developed to prevent and mitigate labor risks, fostering ethical and responsible business relationships. These guidelines include the protection of human rights, the guarantee of freedom of association and collective bargaining, the prohibition of child and forced labor, and the fight against any form of discrimination or labor exploitation.

In the specific context of value chain workforce management, the following policies stand out:

- Human Rights Policy, which establishes the fundamental principles of labor rights protection within the supply chain, including the prohibition of child and forced labor, the guarantee of safe working conditions, and the commitment to freedom of association.
- Sustainability Policy, which defines NOS's approach to integrating environmental, social, and governance (ESG) criteria into its operations and commercial relationships, promoting responsible practices throughout the value chain.
- Code of Ethics, which sets out the fundamental principles and values guiding the company and its partners, ensuring a joint commitment to ethics and social responsibility.

- Code of Conduct for the Prevention and Combating of Workplace Harassment, which reinforces the creation of safe and respectful work environments, applying both internally and in relationships with suppliers.
- Code of Conduct for the Prevention of Corruption and Related Offenses, which establishes clear rules to prevent corruption risks and unethical practices in procurement and supply processes.
- Procurement Manual, which sets out criteria and requirements for supplier selection and management, ensuring compliance with NOS's sustainability and human rights policies.
- Sustainability Requirements for Suppliers and Partners, which formalize NOS's expectations regarding its business partners' adoption of best environmental, social, and labor practices, ensuring that all workers in the value chain operate under dignified and safe conditions.

Detailed information on each of these policies can be found in section "3.1.12 Policies (MDR-P)."

Human rights protection in the value chain

(S2-1_01 / S2-1_02 / S2-1_03 / S2-1_04 / S2-1_05) NOS ensures that its human rights protection practices are comprehensive and mandatory, not only within its direct operations but also across its entire value chain. To achieve this, the company implements concrete measures to ensure that suppliers and partners uphold the same ethical and labor principles that NOS adopts.

(S2-1_06 / S2-1_08) This commitment is reinforced through NOS's Human Rights Policy, which applies to employees, suppliers, and all company stakeholders. This document aligns with the United Nations Guiding Principles, the International Labour Organization (ILO) Declaration, and the Organisation for Economic Co-operation and Development (OECD) Guidelines.

In addition to the Human Rights Policy, NOS implements the Code of Conduct for the Prevention and Combating of Workplace Harassment, which promotes diversity and prevents practices that violate the dignity of employees and partners, as well as the Procurement Manual, which defines criteria for ethical and sustainable procurement. Complementary measures include:

- NOS Code of Ethics (with a summary version for partners and suppliers);
- Code of Conduct for the Prevention of Corruption and Related Offenses;
- Whistleblowing Regulation for Reporting Irregularities.

These policies ensure that all suppliers and partners operate according to strict ethical principles aligned with NOS's values.

NOS also implements a supplier engagement program, evaluating compliance with human rights standards. For suppliers whose performance falls below expectations, action plans and improvement modules are defined. This program ensures that the company's principles extend throughout the supply chain, promoting responsible practices aligned with international standards.

Non-compliance cases

(S2-1_09) To date, no non-compliance cases have been reported regarding the United Nations Guiding Principles, the ILO Declaration, or the OECD Guidelines, reflecting the commitment and effectiveness of the measures implemented.

NOS is fully committed to respecting and promoting human rights at all levels of its organization and value chain. This commitment aims to create an inclusive, fair, and equitable environment for all workers, consolidating NOS as a socially responsible and ethical company.

More information on NOS's Human Rights commitments can be found in section "1.3.3.1.2 Policies (S1-1).

1.3.3.2.3 Engagement with value chain workers (S2-2)

NOS recognizes the importance of open and transparent dialogue with workers in its value chain, ensuring that their perspectives are considered in managing both real and potential impacts. The engagement of these workers follows a structured approach, always in compliance with applicable labor and commercial laws.

Dialogue with value chain workers

(S2-2_01 / S2-2_02 / S2-2_03 / S2-2_04 / S2-2_06) NOS maintains an active dialogue channel with value chain workers through their legitimate representatives, ensuring appropriate engagement in managing labour and social impacts. This dialogue takes place openly and flexibly, without a fixed schedule, allowing interaction whenever necessary with the directors of the NOS units involved. These directors hold operational responsibility for managing this process and ensuring compliance with legal and regulatory standards, thereby guaranteeing a transparent and respectful relationship with all supply chain partners.

Engagement with value chain workers occurs in different phases and modalities through legitimate representatives and formal communication mechanisms. The dialogue is promoted at various moments based on necessity and identified impacts, following a flexible approach to provide agile responses to emerging issues.

The operational responsibility for ensuring that this dialogue takes place falls on NOS unit directors, who guarantee that value chain workers have a voice and are properly represented.

NOS understands that assessing the effectiveness of dialogue with value chain workers is the responsibility of their employers. Therefore, NOS ensures that suppliers maintain appropriate labor relations standards and encourages best practices in communication and problem resolution within their own organizations.

Additionally, NOS provides training and awareness channels for partners' employees, covering topics relevant to both the organization and the value chain, such as Ethics, Security & Privacy, and Workplace Safety. The most common and recurring training sessions focus on ethics and conduct, information security, personal data protection, health and safety at work, environmental management, sustainability, and commercial and customer service techniques. Sustainability and environmental management are particularly emphasized in training sessions

for both company-owned and franchised stores, as well as through the online NOS Academy platform, designed for sales and commercial teams.



Communication Channels

(S2-2_07) NOS ensures that all value chain workers, including those in potentially vulnerable situations, have access to secure and confidential communication channels, enabling them to express concerns and resolve potential issues.

More information on the main available channels and other formal internal communication mechanisms can be found in "1.3.3.1.4. Processes to Remedy Negative Impacts and Channels for Workers to Express Concerns (S1-3)" and "1.3.4.1.1. Policies (G1-1)."

NOS reinforces its commitment to transparency, social responsibility, and the safety of value chain workers, ensuring that all concerns are heard and effectively addressed.

1.3.3.2.4 Processes to remedy negative impacts and channels for value chain workers to express concerns (S2-3)

NOS is committed to ensuring responsible management of its value chain, guaranteeing that workers, both within its own workforce and across its supply chain, have access to effective channels to express concerns or needs, which are handled with the utmost confidentiality and professionalism.

Channels for expressing concerns and needs

(S2-3_02) NOS provides specific channels for value chain workers to report irregularities or raise concerns related to human rights, labor conditions, or ethical issues.

All communications received are treated as confidential, unless the whistleblower explicitly requests otherwise. Workers are encouraged to use these channels in good faith, particularly for reporting violations of legal requirements or NOS's internal policies. The Whistleblowing Regulation ensures that all reported situations are subjected to an efficient, swift, and reliable system for detection, investigation, and resolution, in line with the company's highest ethical standards.

More information on the query and whistleblowing channel can be found in "1.3.4.1.1. Policies (G1-1)."

Support and availability of channels

(S2-3_03) NOS actively promotes the responsible use of its communication channels among all its partners and suppliers, reinforcing their alignment with the company's ethical principles and human rights commitments. NOS acknowledges that a sustainable supply chain relies on the collective commitment of its direct and indirect partners and suppliers, ensuring the promotion of human, labor, and social rights across its operations.

Monitoring and evaluation

(S2-3_04) NOS adopts a continuous monitoring system, conducting regular internal and external audits in compliance with internationally recognized standards, such as ISO 9001 (Quality Management), ISO 14001 (Environmental Management), ISO 45001 (Occupational Health and Safety Management) and ISO 27001 (Information Security Management). These audits assess, among other aspects, the effectiveness of communication channels and alignment with human rights policies.

Additionally, NOS is subject to external scrutiny by ESG analysts and rating agencies, which support the identification of areas for improvement and the reinforcement of its commitments. The company also actively participates in external initiatives related to sustainability and human rights, further strengthening its dedication to best practices in these areas.

Protection against retaliation

(S2-3_06) NOS has strict non-retaliation policies in place, ensuring that workers who use the available channels to report concerns or needs are fully protected. These policies explicitly prohibit any actions that could harm an employee simply for raising a concern or making a report.

NOS's commitment is reflected in its Whistleblowing Regulation, which guarantees that all reported situations are handled confidentially and with protection against retaliation. This ensures that every employee feels safe and confident in expressing concerns, knowing that their reports will be treated professionally, discreetly, and effectively.

Awareness and compliance

(S2-3_05) NOS has ensured that its policies are communicated to all workers within its value chain, guaranteeing that they are aware of the existence and functioning of these channels. The company continuously reinforces awareness and provides training to workers, fostering trust in the available mechanisms for raising concerns and addressing their needs.

1.3.3.2.5 Measures for managing impacts on value chain workers (S2-4)

(S2.MDR-A_01-12/ S2-5_01 / S2-5_02 / S2-5_03/ S2.MDR-T_14-19) NOS is committed to promoting better working conditions, ensuring transparency across its value chain, and mitigating material risks for the workers of its suppliers and partners. To achieve this, the company implements specific measures that uphold human rights and best labour practices, preventing inadequate practices and fostering a fair and safe work environment.

NOS reinforces its sustainability strategy by implementing policies that apply to its entire value chain, establishing minimum standards for working conditions, labour rights, and ethical practices. These guidelines set strict criteria that all suppliers must comply with, ensuring alignment with the principles of equity, transparency, and respect for human rights. Additionally, the company fosters an inclusive and accessible work environment for all professionals operating within its corporate spaces through the following actions:

- Garage Access: NOS provides a digital platform that allows employees, service providers, and visitors to book parking spaces in its buildings. Subject to availability, all workers, regardless of their employment status, can access a free parking spot, ensuring greater equity in infrastructure access.

- Workspace Infrastructure: NOS's workspaces are designed to accommodate both in-house staff and service providers, creating an inclusive and well-equipped environment. These spaces feature meeting rooms, ergonomic workstations, reception areas for visitors and partners, and collaborative and rest areas, ensuring optimal conditions for all professionals to perform their roles effectively.

- Training Academies: The company has developed training academies for its entire partner ecosystem to ensure a deep understanding of NOS's commercial offering and the technical expertise required for installation and provisioning. These academies ensure that suppliers and partners are aligned with NOS's standards, fostering professional development and process standardisation across the value chain.

NOS also promotes transparency throughout its value chain, ensuring that its suppliers and partners adopt ethical practices and comply with human rights regulations. To achieve this, the company has established monitoring mechanisms and corrective actions to enforce labour standards and prevent inappropriate practices, including:

- Whistleblowing Channel: NOS provides a confidential reporting channel where any worker within the value chain can report irregularities or human rights violations. All reports are thoroughly analysed, ensuring full protection for the whistleblower and allowing the company to implement effective corrective actions whenever necessary.

For more information about the whistleblowing channel, refer to section "1.3.4.1.1 Policies (G1-1)".

- Monitoring and Audits: The company conducts regular assessments with its suppliers, ensuring compliance with its sustainability and social responsibility guidelines. Both internal and external audits are carried out to guarantee that NOS's commitments within its supply chain are effectively fulfilled.

- Corrective Action Plans: If non-conformities are identified in the practices of its suppliers, NOS implements corrective action plans that include measures to ensure compliance with its policies and requirements. These plans establish deadlines for implementing improvements and provide close monitoring of the evolution of the adopted measures.

NOS also regularly assesses the effectiveness of its measures through independent audits, international certifications, and strategic partnerships that ensure the application of best practices across its value chain. Among the main monitoring mechanisms are:

- International Standards Certifications: NOS operates under certifications such as ISO 9001 (Quality), ISO 14001 (Environment), ISO 45001 (Occupational Health and Safety), and ISO 27001 (Information Security), ensuring that its practices align with globally recognised standards.

- Impact Analysis and Sustainability Reports: The company conducts periodic evaluations of the impacts of its actions across the value chain, promoting the continuous improvement of its processes.

- Regular Dialogue with Suppliers and Stakeholders: NOS maintains open communication channels with suppliers and partners, fostering ongoing dialogue to align expectations and strengthen commitments to adopting sustainable and socially responsible practices.

All current and future actions mentioned above have a direct or indirect impact on achieving NOS's objectives and targets for supply chain management. These measures ensure that value chain conditions—shaped by NOS's decisions and actions—are upheld.

Considering its value chain, NOS plans to continue these initiatives to cooperate or support the provision of solutions for individuals affected by material impacts, ensuring that their employers also uphold their obligations towards their employees, in alignment with NOS's Code of Ethics.



Metrics and targets

1.3.3.2.5 Targets related to the management of material negative impacts, the promotion of positive impacts, and the management of material risks and opportunities (S2-5)

NOS has established a set of time-bound and results-oriented targets, aligned with its 2025-2030 Sustainability Strategy, aimed at reducing negative impacts, enhancing positive impacts, and mitigating material risks and opportunities related to the workers in its value chain. These targets reflect the company's commitment to fostering responsible practices in its supply chain, ensuring fair working conditions, transparency, and compliance with human rights and business ethics principles.

The definition of these targets is based on NOS's business strategy, engagement with suppliers and stakeholders, and international best practices, ensuring that supply chain management effectively addresses the real needs of its partners and indirect workforce. The monitoring of these targets is conducted annually through quantitative and qualitative indicators, allowing for a continuous assessment of the effectiveness of policies and initiatives implemented.

Strategic targets, commitments, and metrics

(S2.MDR-T_01-13) NOS has established a set of time-bound and results-driven targets, aligned with its 2025-2030 Sustainability Strategy, with the aim of reducing negative impacts, enhancing positive impacts, and mitigating material risks and opportunities related to workers in its value chain.

These targets were defined based on materiality assessments, stakeholder engagement, and alignment with international sustainability standards, ensuring that NOS's actions positively impact its partners and suppliers. The monitoring of these targets is conducted annually through quantitative and qualitative indicators, allowing for a continuous evaluation of the effectiveness of adopted policies and initiatives. Progress tracking will be carried out through sustainability reports, audits, and continuous dialogue mechanisms with suppliers and stakeholders.

Process for target definition and stakeholder engagement

The definition of targets was based on consultations with suppliers, risk analysis in the value chain, and commitment to international best practices. Key aspects considered included:

- Alignment with internal policies and strategic commitments to sustainability and corporate governance;
- Engagement with suppliers and stakeholders in the analysis of risks and opportunities within the supply chain;

Workers in the value chain and their representatives were actively involved in risk and impact assessments, ensuring that the targets reflect real needs within the business ecosystem. Their continued involvement in tracking progress will be ensured through audits and ongoing dialogue mechanisms with suppliers.

Defined targets

NOS has established measurable targets aligned with its commitments to value chain management. These targets directly contribute to the identified material IROs (Impacts, Risks, and Opportunities) and will be monitored in a structured manner to ensure effective implementation.

Commitment: Acting ethically and responsibly with our employees, suppliers, and business partners, ensuring the highest standards of governance.

  - Target: >80% of partner employees trained in ethics by 2030

- NOS is committed to acting ethically and responsibly with its employees, suppliers, and business partners, ensuring the adoption of the highest governance standards. As part of this commitment, the company has set a target to train over 80% of partner employees in ethics by 2030, fostering a business culture based on transparency, compliance with human rights principles, and the adoption of best business practices throughout the supply chain.
- To achieve this commitment, NOS will implement targeted actions to train employees of its business partners, ensuring they are aligned with the company's values and prepared to follow ethics and corporate responsibility guidelines.
- In 2024, 72% of partner employees (participating in NOS Academies) had already completed ethics training, demonstrating significant progress in this area. This result reflects NOS's ongoing commitment to promoting a culture of integrity and responsibility, which will continue to be strengthened in the coming years to ensure that the 2030 target remains on track.

Commitment: Training and empowering employees while Influencing partners and the value chain on material sustainability and responsible management topics

  - Target: >80% of partner employees trained in material sustainability topics by 2030

- NOS has set a target to ensure that more than 80% of partner employees receive training on material sustainability topics by 2030, reinforcing its commitment to spreading best environmental, social, and governance (ESG) practices across its value chain.

- Currently, there is no comprehensive sustainability training specifically designed for partner employees. However, NOS already ensures mandatory training on essential responsible governance topics, particularly ethics, security, and privacy. In 2024, 72% of partner employees (enrolled in NOS Academies) had already completed ethics training.

Monitoring and progress tracking

NOS adopts a data-driven approach with quantitative and qualitative metrics to track progress toward its targets. Performance will be assessed based on:

- Annual sustainability reports, detailing achievements and areas for improvement;
- Internal and external audits, ensuring compliance with established standards;
- Regular consultations with suppliers and stakeholders, enabling ongoing assessment of target effectiveness and adaptations when necessary;
- ESG indicators and industry benchmarks, facilitating comparative analysis and continuous reinforcement of sustainability initiatives.





1.3.3.3 ESRS S3 – Affected communities

Strategy

1.3.3.3.1 Impacts, Risks and Opportunities (ESRS 2 SBM-3)

The actual and potential impacts on affected communities are deeply linked to NOS's strategy and business model, which are guided by strategic cycles focused on creating sustainable value and mitigating adverse effects. The company's actions are centred on what is most relevant for value creation, ensuring a positive and meaningful impact. The company's Sustainability Strategy, aligned with the United Nations Sustainable Development Goals (SDGs), directly reflects this approach and significantly contributes to 11 out of the 17 SDGs, given their strong interconnection with NOS's activities and positioning. This alignment translates into the company's ability to generate value and promote the sustainable development of society.

The 2025-2030 strategic cycle, NOS's fourth sustainability cycle, is structured around four fundamental pillars, two of which are directly related to communities. The pillar "For a More Connected Society" aims to connect all communities safely and responsibly to next-generation networks. This commitment seeks to maximise the benefits of technological innovation and digital literacy, tackling isolation, reducing social and economic inequalities, promoting digital inclusion, and improving the quality of life for all populations. On the other hand, the pillar "More for Our People" highlights NOS's role as a benchmark in protecting and promoting human rights, both within its internal operations and in managing relationships across its value chain, ensuring adherence to fundamental principles.

Additionally, the pillars "In the Name of the Planet" and "Responsible Leadership" complement this strategy. The first is committed to reducing environmental impact by fostering an organisational culture that leverages technology to minimise customers' environmental footprint and ensure business resilience in the face of climate change. This approach also extends to the company's value chain, reinforcing NOS's commitment to broadly reducing

environmental impacts. The second positions NOS as a role model in ethical behaviour, strict compliance with fair competition rules across its markets, and transparency in both internal operations and relationships with partners and stakeholders.

This integrated approach demonstrates how NOS recognises and addresses the actual and potential impacts on affected communities, aligning them with its strategic objectives. Thus, the company not only reinforces its social and environmental responsibility but also maximises shared value, contributing to the sustainable development of the communities in which it operates.

The identified impacts on communities not only influence but also continuously inform and shape the adaptation of NOS's strategy and business model. To ensure this alignment, the company has developed a stakeholder engagement model, implemented on a permanent basis, which enhances the creation of shared value and establishes relationships based on trust and responsive dialogue. The company employs regular and systematic mechanisms to assess stakeholders' needs and expectations, the impacts affecting them, the values they attribute, and the areas requiring improvement. The results of these mechanisms are systematised and analysed alongside sectoral trends and governance, environmental, and social benchmarks, ensuring a comprehensive mapping of stakeholder-identified impacts. This analysis enables NOS to gain a detailed understanding of the dynamics at play and align its actions with the values and principles that guide its activities.

The commitments made to stakeholders are periodically reassessed and adjusted based on insights gathered through these mechanisms. These inputs are prioritised and considered in defining strategic priorities, supporting the development of continuous improvement plans, cooperation dynamics, and partnerships. The identified priorities are integrated into operational management and the development of new initiatives. When significant impacts are identified, NOS implements specific approaches to prevent, mitigate, or remedy adverse consequences, ensuring that its strategy remains aligned with community needs.

This dynamic process ensures that NOS's strategy and business model remain continuously aligned with community needs, promoting resilience, inclusion, and sustainable value creation. By adopting this approach, the company consolidates a more responsible business model that is adaptable to changes in the social, environmental, and economic context.

All materially impacted communities, whether directly affected by NOS's operations or its value chain, are included within the company's disclosure scope. This commitment ensures that no community is excluded, covering specific, geographic, or other groups. Detailed information on these communities, the impacts they face, and the approaches adopted by NOS is transparently documented, reflecting the company's seriousness in managing its material impacts.

Furthermore, NOS recognises that material impacts may affect communities at different points in the value chain, whether they are direct beneficiaries of the company's initiatives or face challenges arising from its activities. The company implements actions aimed at mitigating risks, generating opportunities, and creating shared value, fostering a positive and sustainable impact on the communities with which it interacts.

Finally, initiatives that result in positive material impacts include promoting digital inclusion, technological innovation, and literacy, as well as actions aimed at protecting human rights and promoting environmental sustainability. These activities benefit communities across both ends of the value chain, reinforcing NOS's commitment to responsible, effective, and transparent management.

Impact, risks and opportunities management

1.3.3.3.2 Policies (S3-1)

(S3.MDR-P_01-07) NOS acknowledges that its activities have a significant impact on the communities in which it operates and, as such, adopts a responsible approach to managing its relationship with affected communities. Our commitment extends beyond our direct operations, also covering communities impacted by our suppliers, partners, and service providers, ensuring that the principles of equity, transparency, and respect for human rights are promoted across our entire sphere of influence.

Our policies aim to prevent and mitigate risks that may affect these communities, ensuring that our impact is managed ethically and responsibly. In this regard, and in line with our ongoing commitment, no significant changes were made to the previously mentioned policies during 2024.

NOS is committed to building a positive and lasting impact on the communities it interacts with, reinforcing its social responsibility and contributing to sustainable and inclusive development.

In the specific context of managing impacts on communities, the following policies are particularly relevant:

- Human Rights Policy, which ensures NOS's commitment to protecting and promoting the fundamental rights of communities impacted by its activities, safeguarding well-being, diversity, and international human rights principles.
- Code of Ethics, which establishes the values and principles that guide the company's actions and its relationship with communities, promoting transparency, social responsibility, and active engagement with local stakeholders.
- Code of Conduct for the Prevention of Corruption and Related Offences, which sets out guidelines to ensure that all interactions between the company, communities, and local stakeholders are conducted with integrity and in full compliance with applicable legislation.
- Sustainability Policy, which integrates the community perspective into NOS's strategy, promoting initiatives that contribute to the socio-economic development and environmental preservation of the regions where the company operates.
- Risk Management Policy, which includes the assessment and mitigation of potential socio-economic and environmental impacts on communities, ensuring that the company's actions generate shared value while minimising negative externalities.

Detailed Information on each of these policies can be found in section "1.3.1.12. Policies (MDR-P)".

Commitment to human rights and community impact

(S3-1_02 / S3-1_04 / S3-1_05) NOS is committed to conducting its business in full compliance with applicable legislation and fostering a culture of respect for internationally recognised human and labour rights. This commitment extends to employees, partners, suppliers, and customers, requiring them to align their practices with these same principles. The company actively implements measures to prevent negative human rights impacts and, should they occur, acts swiftly and effectively to mitigate their effects.

In addition to promoting cooperation and encouraging stakeholders to uphold fundamental values, NOS reserves the right to terminate relationships with any parties that are proven or suspected to violate these values, while respecting the principles of proportionality and recurrence.

(S3-1_06) The principles and commitments adopted by NOS in its policies concerning affected communities are aligned with internationally recognised frameworks. These include the International Bill of Human Rights, the ILO Declaration, the United Nations Global Compact Principles, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles on Business and Human Rights. At the national and European levels, the company adheres to references such as the Portuguese Charter of Human Rights in the Digital Age and the Charter of Fundamental Rights of the European Union.

As a signatory of the CEO Guide to Human Rights, NOS recognises that human rights are fundamental and inalienable for all. In 2022, the company reinforced this commitment by conducting an assessment of the actual and potential human rights impacts of its activities, aiming to integrate new commitments into its policy framework. This effort complements existing internal instruments, such as the Code of Ethics and the Sustainability Requirements for Suppliers, and remains in continuous development.

(S3-1_07) More information on NOS's commitment to Human Rights can be found in sections "1.3.3.1.2. Policies (S1-1)" and "1.3.3.2.2. Policies (S2-1)"

1.3.3.3.3 Engagement with affected communities (S3-2)

(S3-2_01-06) NOS recognises the importance of listening to and integrating the perspectives of the communities affected by its activities, ensuring that its actions and decisions are informed by those who best understand local realities. This commitment is implemented through three main approaches, each tailored to specific objectives and stakeholders.

1. Dialogue with Authorities and Regulators

The Regulation and Competition department at NOS is responsible for liaising with regulatory authorities, as well as representatives from executive and legislative bodies at local, national, and European levels. These stakeholders also include municipal and community representatives whose regulations directly impact the company's operations. Ongoing dialogue with these entities is essential to ensuring a legal and regulatory framework that supports the development of NOS's networks and services.

Given the nature of the telecommunications sector—characterised by constant innovation and rapid changes—this continuous interaction ensures that the critical conditions for the company's operational success are adjusted to meet the needs of communities. This commitment enables NOS to maintain an active role in shaping policies that benefit both the company and the communities it serves.

2. Consultations and Partnerships with Local Institutions

NOS maintains close and regular dialogue with partner institutions, NGOs, and other organisations that possess in-depth knowledge of local needs. Before launching any social impact project, the company consults these institutions to identify the specific challenges faced by communities and to gather feedback on the potential impacts of its initiatives.

During project implementation, periodic meetings are held with representatives from partner institutions to monitor progress and adjust actions as necessary. Upon completion of each

project, results are evaluated jointly with these entities to ensure the initiatives' effectiveness and alignment with local expectations. This process is coordinated by the Director of Social Responsibility and the corporate responsibility team, with support from the Director of Sustainability and a Board member, ensuring that community perspectives are integrated into strategic decisions.

3. Engagement with Small and Medium-Sized Enterprises (SMEs)

As part of its efforts to support Portuguese SMEs, NOS conducts regular consultations with local business representatives and organises forums and discussion groups. These interactions enable the company to collect detailed feedback on its products and services and identify opportunities to develop solutions tailored to this segment's specific needs.

Concrete examples of this engagement include initiatives such as smart city development, which transforms urban areas into more efficient and sustainable environments, and programmes such as "Voice Leadership", run in partnership with Nova Business School, which equip business leaders with a better understanding of community dynamics. Additionally, NOS hosts technology events that provide SMEs with opportunities to share feedback and contribute to the evolution of the company's offerings.

Assessing the Effectiveness of Community Engagement

(S3-2_05) The effectiveness of NOS's engagement with affected communities is evaluated in different ways, depending on the nature of the interaction. In the context of institutional and regulatory engagements, the Regulation and Competition department uses the Directorate's Action and Resource Plan as its primary monitoring and evaluation tool. This plan is defined annually and sets specific targets for community relations. Its implementation is closely overseen by the executive board member responsible for this area, ensuring that commitments made through dialogue are successfully fulfilled and that expected impacts are achieved.

For social impact projects, evaluation is carried out through progress meetings with representatives from partner institutions. These meetings provide an opportunity to assess achieved results and adjust actions when necessary. After each project's implementation, results are reviewed jointly to ensure that positive impacts align with community expectations. This ongoing review process strengthens NOS's commitment to socially responsible and results-oriented action.

Additional Measures for Vulnerable Communities

(S3-2_06) NOS implements specific measures to ensure that the perspectives of particularly vulnerable communities—such as women, girls, or other marginalised groups—are heard and integrated into its decision-making. These measures include consultations with specialised entities and the use of tools that promote the inclusion of diverse perspectives. Further details on these actions can be found in the consultation processes described earlier.

Through these integrated approaches, NOS reinforces its commitment to acting as a positive agent of impact, fostering sustainable and inclusive growth in the communities where it operates, while ensuring that its actions reflect the real needs and expectations of stakeholders.

1.3.3.3.4 Processes for remedying negative impacts and channels for affected communities to express their concerns (S3-3)

(S3-3_11-15) NOS has established specific channels and mechanisms that enable affected communities, particularly those in rural or more isolated areas, to directly express their

concerns and needs to the company. These mechanisms are essential for regularly assessing stakeholder expectations and the impacts they experience, mapping the results of consultations, and analysing trends and sectoral benchmarks in governance, environmental, and social issues.

Regular and systematic stakeholder engagement allows NOS to understand the impact of its activities on communities—especially regarding access to networks and technology in rural areas—and to identify their specific needs and expectations. This process is conducted by the relevant functional departments, in alignment with the company's strategic direction, using tools and channels tailored to the target audience and the purpose of each interaction. In addition to broader channels such as the website and mobile applications, NOS employs more targeted communication methods to collect continuous and specific feedback from communities.

Community consultations are carried out in various contexts, including initiatives related to accessibility and digital inclusion in rural areas. The frequency of these consultations varies depending on community needs and strategic objectives, occurring either on a permanent basis or at specific moments, such as during the planning of new strategic cycles.

To track and monitor the issues raised and addressed, NOS relies on two central elements of its management system: the ESG Scorecard and the Integrated Management System.

ESG Scorecard: Following the approval of NOS's 2025-2030 sustainability strategy, an ESG Scorecard was implemented, structured around key strategic pillars. This tool facilitates progress tracking and evaluation, systematically presenting results to the Executive Committee and the Board of Directors. A set of strategic KPIs enables the monitoring of strategy implementation, associated performance, and achievement of objectives.

Integrated Management System: Continuous improvement of processes and activities is a key element of NOS's organisational culture and the sustainability of its operations. Part of the company's commitment is to adopt market best practices, supported by internationally recognised management systems that adhere to this philosophy.

NOS's certified management systems cover the following areas:

- Integrated Management System:
  - ISO 9001: Quality Management System.
  - ISO 14001: Environmental Management System.
  - ISO 45001: Occupational Health and Safety Management System.

Additionally, the company operates under the following Certified Management Systems:

- ISO 27001: Information Security Management System.
- ISO 20000: IT Service Management System.

Within the scope of these certified management systems, impact identification processes are implemented, along with programmes and initiatives to address these impacts. These systems are subject to audits and follow a continuous improvement cycle, ensuring the prevention and mitigation of the key negative impacts associated with NOS's business operations.

This robust approach ensures that the company aligns with market best practices, maximising the positive impacts of its activities while proactively mitigating negative ones.

Communication channels for affected communities

NOS provides dedicated and accessible channels for affected communities, ensuring their effectiveness by leveraging business relationships to broaden the reach and impact of these initiatives. This commitment is reflected in the way the company establishes and maintains inclusive and responsive engagement with all stakeholders.

In addition to broad communication platforms, such as the website and mobile applications, NOS employs specific tools tailored to the characteristics of each affected community. These tools include permanent and accessible communication mechanisms, facilitating continuous dialogue and the structured collection of feedback. Furthermore, consultation processes are systematically conducted during strategic planning, ensuring that the needs of the most vulnerable communities are adequately incorporated into decision-making.

With this structure, NOS reinforces its commitment to amplifying the voices of affected communities, ensuring meaningful and responsive engagement at all stages of its decision-making process.

More Information on the available channels for affected communities can be found in section "1.3.1.9. Stakeholder Interests and Perspectives (SBM-2)"

1.3.3.3.4 Measures for managing material impacts on affected communities (S3-4)

(S3.SBM-3_01-05 / S3.MDR-A_01-12 / S3-4_02-04) NOS acknowledges its responsibility and commitment to being a leader and a differentiating force in innovation serving both the environment and the community, leveraging 5G leadership and the potential of digital technology. The company's continuous efforts in this field have resulted in:

- The introduction of various innovative solutions, products, and services to the market, contributing to a more environmentally efficient, decarbonised, digital, and inclusive society.
- The promotion of entrepreneurship and research, two key drivers of social and environmental value creation actively fostered by NOS.
- Another year of achievements, including the launch of initiatives such as Test Bed 5G & Digital Transformation, further groundbreaking advancements in healthcare, and the implementation of smart services in Portuguese cities and towns.

Approach to sustainable innovation

Innovation is one of NOS's key assets, positioning it as one of Portugal's leading innovators—not only as a fundamental pillar of business development but also as part of its commitment to fostering entrepreneurship, creativity, and value creation for the country.

Guided by its sustainability strategy, a significant portion of NOS's innovation efforts is channelled into projects that generate environmental and/or social value, allowing the company to combine competitiveness with contributions to the United Nations Sustainable Development Goals (SDGs).

NOS's approach in this field is built upon three key technological pillars:

- 5G Technology;
- IoT (Internet of Things), particularly NB IoT (Narrow Band); and
- Advanced Analytics.

By integrating these technological enablers with other emerging technologies, NOS adopts a holistic innovation approach, leveraging its internal capabilities while collaborating with external partners. Through strategic partnerships with clients, industry players, developers, and academia, NOS fosters a dynamic innovation ecosystem, driving sustainable solutions that create shared value. The company's main focus areas for sustainable innovation include:

- Energy efficiency and low-carbon solutions;
- Smart and sustainable cities and mobility;
- Health, active living, and well-being; and
- Circular economy and digital dematerialisation.





Cofinanced projects with a sustainability focus

NOS is actively involved in several research, technological development, and innovation projects that benefit from cofinancing. These projects are developed in partnership with multiple stakeholders, including established companies, startups, and entities from the national scientific system (e.g., universities, research centres, and collaborative laboratories). In some cases, NOS assumes the leadership role within these consortiums.

A significant portion of these projects focuses on sustainability drivers. They aim to generate and internalise new scientific, technical, and technological knowledge while simultaneously developing and testing new solutions and business models in areas such as energy, smart cities, and active and healthy ageing for senior populations.

Mobilising agendas and test beds with NOS participation

The Recovery and Resilience Plan (RRP) is accelerating the transformation of the Portuguese economy through structural reforms and investments, structured into three dimensions: resilience, climate transition, and digital transition. In 2024, NOS reinforced its role within the Research, Development & Innovation (R&D&I) ecosystem, continuing several initiatives within the PRR framework, with a particular emphasis on:

- Mobilising Agendas for Business Innovation (Component 5 – Resilience), which accelerate economic transformation through strategic consortia that foster innovation, exports, and skilled employment. NOS is participating in 12 out of the 51 projects supported, with a total of €3 billion in public funding.
- National Test Bed Network (Component 16 – Digital Transition), comprising physical and digital infrastructures that support SMEs and startups in the development and testing of new products and services, accelerating digital transformation. NOS is currently implementing two Test Beds.

Through these initiatives, NOS is leveraging 5G technology to drive innovation and national competitiveness, promoting its adoption across both the B2C market and the industrial sector. Its involvement in more than a dozen strategic projects strengthens its position in critical

economic sectors, accelerating 5G exploration and fostering the development of new products and services.

These projects will run until the end of 2025, involving businesses, municipalities, and scientific and technological institutions across mainland Portugal and the islands.

Mobilising agendas and test beds with NOS participation

- Be.Neutral Agenda (Leader: NOS) – Positions Portugal as an exporter of zero-carbon mobility solutions, developing mobility and connectivity management platforms, as well as 4G/5G-enabled charging systems for electric vehicles.

- Alliance for the Energy Transition – Drives digitalisation and efficiency in the energy sector. NOS provides connectivity, cloud infrastructure, and mobility insights to support innovative solutions.

- Transform Agenda – Transforms Portugal's forestry sector towards sustainability and digitalisation. NOS supports digital technology pilots for forest monitoring and management over NB-IoT/5G networks.

- Accelerate and Transform Tourism Agenda – Develops an innovative "Customer Journey" concept, promoting digitalisation and sustainability in tourism. NOS contributes to the Digitalisation of Territories pillar, offering connectivity, analytics, cloud services, and augmented reality (AR) for projects in restaurants and urban art.

- TEXP@CT Agenda – Accelerates the digital transformation of the textile and apparel sector, making it more sustainable and innovative. NOS integrates connectivity and AR into smart textiles and equips a factory with 5G to enhance efficiency and competitiveness.

- Health from Portugal Agenda – Positions Portugal as a global hub for healthcare innovation. NOS contributes to the development of a Health Data Lake, the integration of new mobility routes for emergencies, and the demonstration of a surgical protection helmet for hospitals.

- Route 25 Agenda – Develops technologies for autonomous, intelligent, and inclusive mobility. NOS provides the 5G infrastructure to support testing and new use cases in the sector.

- PRODUTECH R3 Agenda – Equips the industry for the green and digital transition. NOS supports industrial proof-of-concepts (PoCs) with 5G technology, enabling the testing and validation of new technological solutions.

- New Space PT Agenda – Reinforces innovation in the Portuguese space sector. NOS supports the development of satellite imagery-based products and tests IoT/5G applications in aerospace contexts.

- PT Smart Retail Agenda – Focuses on the digital transformation of the retail sector, creating more agile and efficient customer experiences. NOS contributes to the validation of unattended retail formats using 5G technology.

- Accelerat.ai Agenda – Develops Conversational AI and Contact Centre as a Service (CCaaS) solutions to optimise interactions between entities and citizens. NOS supports the validation of use cases within the telecom sector.

- eGames Lab Agenda – Establishes a national cluster for video game development, enhancing talent retention and international competitiveness. NOS provides 5G and cloud technology for innovative gaming products and services.

- 5G & Digital Transformation Test Bed (Leader: NOS) – Supports SMEs and startups in the digital transition, testing new products and services across telecommunications, industry, retail, healthcare, smart cities, and sustainability. The goal is to develop 165 pilot solutions by 2025.

- AMCC Test Bed – Accelerates the digitalisation of the media sector, providing infrastructure and expertise for startups and SMEs to develop innovative products. It aims to deliver 59 pilots by 2025, positioning Portugal as a reference in the sector.

Smart cities

Smart cities have been a priority for NOS for several years. Through a strategy of engagement and collaboration with municipalities, and in partnership with various stakeholders, the company now boasts a significant portfolio of innovative solutions implemented to address diverse needs and challenges, thereby fostering the sustainability of numerous cities and towns.

Interactive apps that strengthen the connection between local authorities and citizens, intelligent and sustainable mobility solutions, optimised management systems for water, energy, and waste, administrative modernisation, and operational cost reduction are some of the solutions we have been contributing to.

All these solutions reach their full potential thanks to the ultrafast speed, reduced latency, security, reliability, and connectivity offered by 5G technology. Over the past two years, NOS's investment in this technology has enhanced the impact of such solutions. Several cities now already benefit from solutions supported by NOS's 5G network.

During 2024, NOS continued to support the intelligent modernisation of both cities and towns in Portugal, demonstrating that beyond the specific projects implemented, market demand for such solutions is growing, also as a result of our promotional efforts in this area.

This action applies downstream of NOS's activities, encompassing municipalities and their respective citizens across mainland Portugal and the islands.

Intelligent irrigation

With the increasing risk of severe drought, intelligent irrigation projects have been implemented in two towns. The deployed solutions, which ensure management based on patterns and condition prediction, allow for optimised soil irrigation, reducing unnecessary water consumption.

Among the projects carried out in 2024, the following stand out:

1. Waste Management in CM Barreiro – A project for sensorising waste trucks and containers to monitor fill levels in real time and optimise collection routes, thereby enhancing service quality.

2. Fleet Management in CM Cascais – A municipal fleet management project that optimises city operations and reduces fuel costs.

3. Mobility Analytics in CM Ponta Delgada, CIM Viseu e CM Loulé – Mobility analytics projects based on anonymised data from NOS, aimed at creating a set of indicators and statistical analyses of mobility and tourism patterns to support decision-making and deliver better services to citizens.



NOS 5G: better and more accessible healthcare for all

NOS remains committed to exploring and demonstrating the potential of 5G technology and digital transformation to businesses and society, encouraging its adoption as a driver of business model innovation and a more advanced and inclusive society.

In 2024, beyond smart cities, NOS has been involved in the development and implementation of innovative healthcare projects that showcase the transformative potential of 5G in the sector. Notable examples include the "S@úde+Perto" project and the "First Remote Ultrasounds Performed Using NOS 5G".

These initiatives apply downstream of NOS's activities, covering healthcare units and their patients across mainland Portugal and the islands.

S@úde+Perto

This project, led by Hospital de Avelar in partnership with NOS and Hope Care, ensures remote yet close monitoring of chronic patients, enabling the early detection of health deteriorations and a rapid response to emergencies. Using telehealth devices that leverage NOS's 5G network for real-time data transmission, biomedical signals are continuously monitored, collected, and processed on a dedicated platform. In the event of deviations, an alert system is triggered and remotely monitored by healthcare professionals. NOS 5G ensures the system's connectivity and guarantees high-quality teleconsultations for ongoing patient monitoring.

Remote health monitoring

660

Elderly patients remotely monitored to prevent critical health episodes through a remote health monitoring solution supported by NOS 5G.

Remote ultrasounds via NOS 5G technology prevent unnecessary travel for patients in remote areas



Portugal's first real-time remote ultrasound system, powered by robotic technology, operates through NOS's 5G network. The ROSE – Robot Sensing for Tele-Echography system, developed by Instituto Pedro Nunes (IPN) in partnership with the University of Coimbra, Sensing Future Technologies, and Hospital da Luz, enables ultrasound examinations to be performed remotely, eliminating the need for patient travel.

ROSE is equipped with two robotic stations, a set of ultrasound probes, and communication structures based on NOS's 5G network, ensuring that the entire process is conducted in real time, with instant feedback and zero disruptions. This solution optimises healthcare resources while significantly improving access to medical care in remote areas, where specialised professionals are not permanently available. Additionally, it paves the way for new opportunities, such as remote training and technical supervision.

NOS 5G: Driving inclusion and digital literacy

Digital transformation only translates into real societal progress if it is inclusive and accessible to all. It is essential to implement measures that promote widespread and informed access to digital technologies, with a particular focus on vulnerable groups. This principle underpins NOS's social responsibility strategy.

As part of its Social Responsibility Programme and its commitment to sustainability, in 2024, NOS structured its actions around three key pillar:

Digital empowerment

NOS aims to contribute to the development of a more digital society, ensuring equal access to technology, particularly for the most vulnerable segments of the population. To achieve this ambition, the company has established strategic commitments, including:

- Developing a programme focused on promoting digital literacy and access to technology for vulnerable groups.
- Launching an initiative to train young people and professionals in future digital skills.



Project ZER01

Aligned with these commitments, NOS partnered with ENSICO to launch "Project ZER01 – Enter the Logic of Computing", aiming to provide free computing education to children and young people, preparing them for the digital future.

Launched in 2022, the project initially reached 400 students across 18 primary and lower secondary school classes, providing weekly free computing lessons. In its third edition, NOS increased its investment, focusing on geographically decentralised areas with greater socio-economic challenges.

For the 2024/2025 academic year, the programme will benefit 2,500 students from Years 1 to 9, across 24 schools in Arcos de Valdevez, Bragança, Gondomar, Vila do Conde, Mirandela, Monção, São João da Pesqueira, and Cascais, covering 110 classes.

Additionally, 95 teachers with degrees in Basic Education and Mathematics will receive training as part of the initiative.



Digital classrooms

NOS Digital Classrooms were created to promote equitable access to technology and high-quality connectivity, fostering opportunities for social and economic development.

These spaces are set up within partner Third Sector Organisations and are available to their beneficiaries, serving as study and training hubs, as well as spaces for personal development and skill-building—particularly digital skills. They can also be used for professional activities, administrative tasks, or leisure and entertainment.

In addition to cutting-edge NOS technology, the Digital Classrooms are equipped with computers, tablets, VR headsets for immersive educational and entertainment experiences, and various other technological tools that support schoolwork and professional development.

NOS inaugurated its first Digital Classroom at Academia do Johnson, supporting the institution's mission and providing assistance to over 200 young people, children, and families in the Zambujal neighbourhood.

5G for GOOD – the impact of next-generation technology

5G is a disruptive technology that unlocks countless possibilities across various fields. It serves as a catalyst for breaking down distance barriers, connecting everyone and everything in real time, seamlessly.

NOS aspires to lead the 5G revolution in Portugal, committing to making this transformative technology accessible to all, particularly to those most in need. At the same time, NOS aims to inspire new projects that can make a meaningful impact on people's lives and society as a whole.

- Emotion vest at NOS Alive
  NOS took a group of deaf individuals to NOS Alive, allowing them to experience the full excitement of Dua Lipa's concert. In partnership with Access Lab, NOS developed a solution based on three components: the sensory vests, now equipped with 5G technology, providing mobility to users and real-time sound capture; and through a NOS-developed app, the provision of Portuguese Sign Language (LGP) interpretation and real-time captioning. This solution enabled a group from the deaf community to feel the power of live music in a unique and immersive setting, in harmony with the rest of the audience.

- Pata à Porta
  NOS partnered with Animalife, IRA, and Animais de Rua to launch the "Pata à Porta" animal adoption platform. This pilot project uses Augmented Reality (AR), powered by 5G, to present animals in a more immersive way, helping people form an emotional connection remotely and facilitating the adoption process.



Support for third sector organisations to strengthen communication infrastructure

Supporting Third Sector organisations through donations, communication services, campaigns, or by addressing their specific needs is one of the most significant ways in which NOS contributes to social responsibility.

This support includes both medium- and long-term partnerships as well as one-off assistance.

Among the various organisations supported, notable examples include:

- SOS Voz Amiga, an emotional support helpline available to assist individuals experiencing loneliness, anxiety, depression, or suicidal thoughts.
- Refugees Association UAPT, which provides social assistance to Ukrainian refugees, including a Rehabilitation Centre for war-injured individuals.
- Association for the Promotion of Child Safety, which works to promote safe behaviours, environments, and products that ensure healthy growth for children and young people.
- NÓS Association, whose mission is to promote social inclusion for people with disabilities or those facing other social disadvantages.
- Bagos D'Ouro, an organisation dedicated to supporting the education of children and young people in the Douro region who are living in financial hardship, as a means of fostering social inclusion.

- Entrajuda, which strengthens the non-profit sector, particularly charitable institutions, by providing access to essential resources and tools needed to fight poverty and promote social inclusion.
- Make-A-Wish, which grants wishes to children and young people aged 3 to 17 across Portugal who are battling serious, progressive, degenerative, or life-threatening illnesses, offering them moments of strength, joy, and hope.

Many of the provided contributions are aimed at supporting social integration projects with a strong focus on capacity-building. This includes Stand4Good Association, which assists university students in proven financial hardship, with the goal of preventing school dropout and improving youth employability; the recurring support to Rotary Club Lisboa-Centennarium, which awards scholarships to students in financial need; and Bagos d'Ouro Association, whose funding was increased in 2024, allowing 30 additional young people from Mesão Frio, Douro, to receive educational support.

NOS Employees' contribution

Throughout the year, NOS engaged its employees in community initiatives, forging partnerships with various organisations to create volunteering opportunities and other solidarity actions.

Goods collection

To mark World Day of Social Justice, NOS organised a goods collection campaign for Vida Norte, an organisation supported by NOS that assists pregnant women and babies in vulnerable situations.

For two weeks, employees actively contributed to this campaign by donating hygiene products, food, clothing, and childcare essentials.

Community dinners

NOS partnered with Serve The City to organise community dinners in Lisbon and Porto, where NOS employees served over 200 meals to individuals in vulnerable situations, providing them with a warm meal and a special evening of support.

Food bank campaigns

NOS mobilised its teams to participate in food collection drives for the Food Bank in Lisbon and Porto. Hundreds of employees joined the initiative, either as a team or with their families, contributing to the success of these campaigns.

Solidarity cellar

Every year, during the holiday season, NOS receives gifts from partners, suppliers, and clients as a token of appreciation. Through the Solidarity Cellar initiative, these items were made available for purchase, with all proceeds donated to NOS's partner organisations.

Regarding cinema, support is provided at both cultural and social levels:

In 2024, through multiple contributions to associations and social integration projects focused on capacity-building, NOS positively impacted over 22,000 people, strengthening social and educational initiatives.

Portuguese cinema meetings

A NOS promotes various socially significant initiatives that help drive the national economy and society, one of which is support for Portuguese culture and cinema. The Portuguese Cinema Meetings is the most important initiative supported by NOS in this field. In 2024, the event marked its ninth edition, featuring 47 Portuguese production projects, making it the largest edition ever. Organised by NOS Audiovisuais in partnership with the ICA – Instituto do Cinema e do Audiovisual, the event brought together over 200 professionals from the national film industry, including producers, screenwriters, actors, and directors, among others. The edition concluded with a debate under the theme: "The Challenges of Portuguese Cinema?".

With the goal of showcasing national film production and fostering discussion, since 2016, the Portuguese Cinema Meetings have presented approximately 350 projects, with around 1,800 industry representatives participating. To date, around 70% of these projects have premiered in cinemas.

Our Voice

Launched on 15 May, Our Voice is a dedicated screening space for Portuguese cinema, available 365 days a year in three cinemas: Alvaláxia (Lisbon), Alameda (Porto), and Alma (Coimbra). While the specific screening room may vary depending on seating capacity and expected film performance, these cinema complexes will always have at least one screening room dedicated to national films throughout the year, featuring new releases and re-screenings from various distributors. In 2025, NOS will continue working to achieve even greater results with this initiative.

Throughout 2024, NOS Cinemas maintained its commitment to supporting social initiatives. This contribution applies downstream of NOS's activities, covering mainland Portugal and the islands. Among the key actions carried out:

- Donation of tickets to the Prado Community Centre of the Red Cross;
- Offering 50 tickets to Santa Casa da Misericórdia.

Entrepreneurship support

NOS's contribution to innovation, including innovation serving sustainability, is largely driven by its commitment to fostering entrepreneurship. Entrepreneurship itself is a key driver of socio-economic development, reinforcing NOS's role in promoting new ideas, businesses, and technological advancements that generate long-term value.



NOS Hub 5G

In 2024, the NOS Hub 5G continued its mission to develop innovative and relevant solutions within the fifth-generation mobile network ecosystem.

With a progressive expansion of its scope, the NOS Hub 5G fostered new use cases across areas such as Critical Communications, metaverse applications, industrial production control, smart parking management, and computer vision-assisted sales systems, among others. This diversification of projects reflects NOS Hub 5G's position as a driver of innovation and co-creation within the 5G ecosystem.

The 5G Hub hosted several conferences and innovation workshops, bringing together key players from the 5G value chain to discuss how to best leverage this technology for people and industries. This was complemented by over 150 visits from clients and partners, reinforcing knowledge exchange throughout the year. Sharing expertise and experiences is one of the Hub's core missions, reflected in workshops and training sessions in areas such as IoT and 5G use case demonstrations. These initiatives have been instrumental in empowering businesses and decision-makers to explore new opportunities and adopt emerging technologies.

Additionally, the Hub has supported multiple companies in developing innovative products and services, providing specialised assistance in architecture definition, testing, proof-of-concept development, and implementation support. This has been particularly valuable in helping startups and small businesses overcome the valley of death and successfully bring their products to market.

Collaboration with universities and educational institutions remains an integral part of the Hub's activities, with student visits facilitating awareness and engagement with the importance and potential of 5G technology. As digitalisation accelerates, the 5G Hub continues to play a crucial role, providing the necessary support for companies to fully harness the potential of new technologies.

In 2024, the Hub recorded:

- Over 150 visits from clients, partners, and institutions
- Around 25 external events
- 3 training sessions

The implementation of adopted and planned actions by NOS reflects the company's commitment to promoting digital inclusion, environmental sustainability, and social development. These objectives align with strategic goals, such as ensuring full fibre optic and

5G network coverage across the country, positively impacting children and young people through educational programmes and campaigns, investing in 5G-powered social initiatives, supporting Third Sector institutions, and promoting a significant number of annual volunteer hours. To achieve these goals, NOS heavily invests in both infrastructure and social initiatives, reaffirming its ambition to generate positive impacts across multiple societal dimensions.

Among the most impactful initiatives, key projects include "Project ZER01", which promotes digital inclusion by offering free computing education to underprivileged children, preparing them for a highly digital society. In parallel, the "5G for GOOD" programme leverages 5G technology to create solutions that improve accessibility and quality of life for vulnerable populations. These initiatives are complemented by the 5G Hub, which develops innovative solutions in partnership with businesses and communities, positioning NOS as a leader in technological innovation.

In terms of environmental sustainability, NOS participates in mobilising agendas such as the "Alliance for the Energy Transition" and "Be.Neutral", which drive decarbonisation and sustainable mobility. These initiatives reinforce the company's commitment to adopting responsible practices aligned with the United Nations Sustainable Development Goals (SDGs).

Additionally, NOS supports dozens of Third Sector institutions by providing donations, discounted communication services, and technological equipment. These efforts include initiatives such as "NOS Digital Classrooms", designed to promote social inclusion and digital literacy. Implemented in partner organisations, these spaces offer academic support and digital skills training, creating personal and professional growth opportunities for people in vulnerable situations.

NOS also organises internal initiatives involving employees, such as food collection campaigns for the Food Bank, community dinners in partnership with Serve the City, and solidarity sales during the holiday season, where proceeds are donated to organisations such as SOS Children's Villages. These actions foster not only solidarity but also internal team cohesion within NOS.

The effectiveness of these initiatives is assessed through specific indicators. For partner organisations, results are reported in their activity reports, allowing NOS to monitor progress and adjust actions as needed. For internal initiatives, success is measured by employee participation and engagement levels. Additionally, community feedback is collected through regular meetings and evaluation sessions, ensuring that actions effectively address their needs. This integrated approach ensures that NOS's initiatives continue to generate positive impacts and foster shared value creation.

Metrics and targets

1.3.3.3.5 Targets related to the management of material negative impacts, the promotion of positive impacts, and the management of material risks and opportunities (S3-5)

Defined targets

S3.MDR-T_01-13) NOS has established measurable targets associated with its commitments to community management. These targets directly contribute to the identified material IROs and will be monitored systematically to ensure effective implementation.

Commitment: Leveraging NOS's strategic assets and competencies to create Impact in local communities through support for institutions and social responsibility initiatives.

- Target: €500K investment in 5G social initiatives by 2030

- NOS has set a target to invest €500,000 in social initiatives powered by 5G by 2030, reinforcing its commitment to technological innovation for social good. This investment aims to leverage 5G technology to support communities, particularly vulnerable individuals and groups, through projects that promote education, healthcare, digital accessibility, and connectivity in underserved regions.
- To ensure real and measurable impact, NOS has established specific criteria for eligible investments. Projects must use 5G as an enabler for supporting socially vulnerable individuals or communities and are identified through the NOS 5G Task Force, in collaboration with partner institutions that help map social challenges. The total investment is budgeted and reported annually, ensuring transparency in its implementation.
- This target builds upon NOS's investment in 5G for Good initiatives up to 2024, which included technological solutions and associated awareness campaigns. As this commitment was established within the 2025-2030 strategic cycle, there are no reported results yet, but NOS will continuously track its progress to ensure positive societal impact.
- The impact of these initiatives may vary based on solution scalability and customization needs. Some actions may directly benefit small groups, while others may impact entire communities. However, many of these solutions have mass adoption potential, allowing for replication and application to broader social challenges.
- Through this initiative, NOS reinforces its role in promoting connectivity as a driver of social transformation, ensuring that 5G technology translates into positive, accessible, and socially impactful solutions.

Commitment: Leveraging NOS's strategic assets and competencies to create impact in local communities through support for institutions and social responsibility initiatives.

- Target: 200 institutions supported by 2030

- NOS has set a target to support 200 institutions by 2030, reinforcing its commitment to social responsibility and positive community impact. This goal aligns with NOS's Social Responsibility Strategy and reflects its active role in supporting organisations focused on digital inclusion, education, culture, and social well-being. Support may take various forms, including financial donations, provision of equipment, communication services, advertising space, and cinema tickets, ensuring that beneficiary institutions have the necessary resources to enhance their activities and maximise impact.
- To ensure structured and transparent support, NOS has established a methodology to guide the identification and selection of beneficiary institutions. Eligible organisations must be Third Sector entities operating in Portugal, whose mission and impact align with NOS's values and strategic objectives. The selection process is based on the relevance of the institution's work, its potential to generate positive societal impact, and priority is given to institutions whose projects align with NOS's strategic focus. Additionally, the type and frequency of support are formalised through agreements, ensuring predictability and commitment in assistance. The total value of contributions

is measured and reported on a quarterly and annual basis, ensuring rigorous monitoring and continuous evaluation of NOS's social investment.

- The impact of these initiatives varies depending on the size and operational capacity of the supported organisations. Some institutions may have a local and targeted reach, while others possess the potential for scaling and replicating their initiatives. Additionally, the value and type of support may be adjusted annually according to available resources and NOS's strategic priorities.
- As this target was established within the 2025-2030 strategic cycle, there are no accumulated results yet. However, NOS has a strong track record of supporting institutions, ensuring that this commitment will be closely monitored and systematically implemented over the coming years. With this initiative, NOS reaffirms its role as a driver of social change, contributing to the strengthening of the Third Sector and fostering a more just, inclusive, and connected society.

Commitment: Leveraging NOS's strategic assets and competencies to create impact in local communities through support for institutions and social responsibility initiatives.

  - Target: 70% of employees participating in at least one initiative per year by 2030

- NOS has set a target to ensure that 70% of employees participate in at least one initiative per year by 2030, reinforcing its commitment to active employee engagement in social and environmental impact actions. This target highlights the importance of internal participation in building a more sustainable future, encouraging collaboration, volunteerism, and positive community impact as an integral part of the company's culture.
- The percentage of participating employees includes all initiatives developed by NOS, such as volunteer work with partner institutions, solidarity-driven team-building activities, and proximity projects addressing current social challenges. The target was established based on the recorded participation rate of 22% in 2024, with annual adjustments in line with strategic evolution and the growth of employee-focused initiatives.
- To achieve this ambition, NOS is leveraging two key drivers: a gradual increase in the number of initiatives specifically designed for employees, creating more opportunities for engagement, and strengthening internal communication and mobilisation to enhance awareness and participation in promoted initiatives.
- As this target was established within the 2025-2030 strategic cycle, there are no reported results yet. However, NOS already fosters a culture of active participation, encouraging employees to engage in causes that generate a positive impact on society and the environment.
- With this initiative, NOS reinforces its commitment to a participatory corporate citizenship model, ensuring that employee engagement translates into real and lasting community impact.

Commitment: Promoting the democratic use of electronic communications and the development of digital skills. Encouraging the responsible use of communication services.

- Target: Reaching 2.5 million children and young people through educational programmes and awareness campaigns by 2030

- NOS has set a target to impact 2.5 million children and young people through educational programmes and awareness campaigns by 2030, reinforcing its commitment to digital education and preparing new generations for future challenges. This target aligns with the company's Social Responsibility Strategy and reflects its active role in promoting digital literacy and raising awareness of critical issues such as online safety, digital dependency, and technological inclusion.
- The impact of this initiative results from a combination of the number of students directly involved in educational programmes and the potential reach of awareness campaigns conducted through NOS Cinemas. This commitment was established in partnership with education sector institutions, allowing for the identification of priority needs and the definition of an ambitious yet realistic target.
- In recent years, NOS has been expanding its digital literacy programmes, notably through Project ZER01, which significantly increased the number of students covered in 2024, and new initiatives introduced in 2025, such as the (IN)FORMAT programme, developed in partnership with Fundação da Juventude, and awareness campaigns dedicated to digital education. This evolution reflects the need to adapt educational content to the constantly changing digital landscape, incorporating emerging topics and ensuring that programmes remain relevant and effective.
- The impact measurement methodology considers various criteria, including student participation in primary, lower secondary, and upper secondary education, with a particular focus on TEIP territories and isolated or disadvantaged regions. The impact of educational programmes is assessed through attendance records and periodic student evaluations. For awareness campaigns, their effectiveness is measured through indicators such as NOS Cinemas audience figures and website visits. This data is analysed annually to track progress toward the target and ensure the effectiveness of the implemented initiatives.
- Despite its significant impact potential, measuring results presents certain challenges, such as assessing the quality of student engagement, the influence of external factors on educational performance, and estimating the real impact of campaigns based solely on audience exposure.
- As this target was revised in the 2025-2030 strategic cycle to make it more ambitious, there are no accumulated results yet. However, NOS already has a strong track record in promoting digital education initiatives, ensuring that this commitment will be closely monitored and systematically implemented over the coming years.
- Through this initiative, NOS will continue to track its progress, reinforcing its commitment to empowering children and young people and ensuring that technology serves as a driver of learning, safety, and digital inclusion.



1.3.3.4 ESRS S4 – Consumers and end users

Strategy

1.3.3.4.1 Impacts, risks and opportunities (ESRS 2 SBM-3)

(S4.SBM-3_01-08) The actual and potential impacts on consumers and end users are deeply interconnected with NOS's strategy and business model. The company adopts a customer-centric approach, developing next-generation telecommunications services that connect families, businesses, and communities, including those in more remote areas. This commitment translates into a continuous effort to provide efficient and effective solutions to meet the needs of consumers and end users, maximising shared value creation.

Managing both positive and negative impacts is a core pillar of NOS's operations, integrated into its governance structure, development strategy, policies, and operational programmes. This strategic alignment is guided by the United Nations Sustainable Development Goals (SDGs) and is reflected in NOS's 2025-2030 strategic cycle, particularly in the pillars "For a More Connected Society" and "Responsible Leadership". The former focuses on safely and responsibly connecting communities to next-generation networks, promoting digital inclusion, technological literacy, and the reduction of inequalities. The latter underscores the importance of ethical and transparent practices, ensuring that the company's operations align with social responsibility values.

NOS's strategy is shaped by ongoing analysis of macroeconomic trends and material risks and opportunities, ensuring value creation for its stakeholders.

The company offers an extensive portfolio of next-generation fixed and mobile telecommunications, as well as IT solutions tailored to different market segments:

- Consumer market (families and individual users);

- Enterprise market (ranging from small and medium-sized enterprises to large economic groups);
- Wholesale market (provision of wholesale data and roaming services at both national and international levels).

Accordingly, consumers and end users impacted by NOS's activities fall into the category (ii) users of services that may affect their rights to privacy, personal data protection, freedom of expression, and non-discrimination and, in the case of business customers, (iii) users who rely on accurate and accessible information regarding products or services.

User security and privacy

NOS recognises the challenges and risks associated with personal data privacy and information security, including the threat of cyberattacks that could compromise customers' sensitive data. These risks include threats such as ransomware, malware, and phishing, which have the potential to disrupt critical systems, leading to intrusions, data breaches, modifications, destruction, or other threats, whether from internal or external sources.

To mitigate these risks, in 2024, NOS reinforced its security and privacy measures, implementing robust cybersecurity solutions and strengthening vulnerability management practices. These measures include:

- Continuous threat monitoring and regular audits to ensure compliance with security standards;
- Investment in artificial intelligence and machine learning for the early detection of malicious activity;
- Ongoing awareness and training programmes for employees to foster a strong digital security culture.

NOS also adopts an inclusive approach to ensure that all consumers and end users are considered and protected, with a particular focus on children and young people. The company provides features designed to promote a safe and inclusive digital environment.

Opportunities – Promoting inclusion and digital literacy

NOS believes that digital transformation must be inclusive and accessible to all and plays an active role in promoting digital inclusion and technological literacy. This commitment is embedded in the pillar:
"For a Digital Future – Driving society's digital transformation through democratic access to technology and inclusion of the most vulnerable groups."

To fulfil this ambition, NOS invests in multiple areas, including:

- Expanding network infrastructure, ensuring broader coverage and improved service quality;
- Advancing 5G technology, showcasing its transformative potential for social and economic inclusion;

- Offering accessible solutions, such as social tariffs and adapted technologies for people with special needs;
- Developing educational initiatives, such as Project ZER01, to promote digital literacy among children and young people.

Furthermore, NOS identifies significant opportunities in creating innovative services that enhance access to high-quality information and positively impact users' quality of life. Examples include:

- E-health technologies, which support chronic patients and help address the financial challenges of an ageing population;
- Solutions that reduce environmental impact, promoting digital sustainability in businesses and society.

Additionally, NOS views customer satisfaction and service recommendation as a strategic opportunity for driving sustainable growth. This focus is reflected in:

- Increasing average revenue per user (ARPU) through innovative service offerings;
- Higher adoption of complementary services (upselling), providing a more comprehensive digital experience;
- Reducing churn rates, strengthening customer relationships and enhancing loyalty.

Risks and mitigation measures

NOS identifies the following risks associated with its operations, products, and services:

- Reputational damage and loss of consumer trust due to security or privacy breaches;
- Financial impacts resulting from potential fines or regulatory sanctions for non-compliance with data protection regulations;
- Technological risks, including cyberattacks and threats such as ransomware, malware, and phishing, which could compromise system integrity and customer data security.

To mitigate these risks, NOS adopts a robust governance model and implements strict protection measures, including:

- Strengthening digital security infrastructure to prevent potential cyber threats;
- Continuous monitoring and audits, ensuring compliance with the most stringent security standards;
- Investing in advanced technologies, such as artificial intelligence and machine learning, for early threat detection;
- Raising awareness and providing training to employees and partners, reinforcing a strong digital security culture.

The trust relationship with customers is further strengthened through the quality and security of NOS's infrastructure, ensuring not only service continuity but also consumer satisfaction and loyalty.

In 2025, NOS aims to continue enhancing customer experience, investing in innovation, and developing solutions that promote digital inclusion and sustainability. At the same time, the company will prioritise risk mitigation and consumer protection, ensuring operational resilience and maximising opportunities that drive sustainable, long-term growth.

Impact, risks and opportunities management

1.3.3.4.2 Policies (S4-1)

(S4.MDR-P_01-06) NOS acknowledges that its operations have a significant impact on consumers and end users of its services. As such, the company adopts a responsible approach to customer relationship management, ensuring that quality, security, accessibility, and the protection of consumer rights are upheld in all interactions.

Our commitment extends beyond the provision of products and services, encompassing the promotion of an inclusive, transparent, and secure digital experience. Through our policies and practices, we strive to mitigate risks that may affect consumers and end users, ensuring that privacy and data protection remain core principles of our operations.

By adopting this approach, we reinforce our responsibility towards consumers and end users, contributing to a more sustainable, accessible, and secure digital society.

In the specific context of impact management for consumers and end users, the following key policies stand out:

- Information Security Policy, which sets out the principles and measures to ensure the confidentiality, integrity, and availability of customer data, providing protection against digital threats and cyberattacks;
- Customer Privacy Policy, which defines NOS's commitments regarding the collection, use, and protection of consumers' personal data, ensuring transparency and compliance with data protection regulations;
- Privacy and Personal Data Protection Commitment Statement, which reinforces the company's priority to safeguard user privacy and data security, fully aligning with the principles of the General Data Protection Regulation (GDPR);
- Human Rights Policy, which guarantees the protection of consumers' fundamental rights, ensuring fair and non-discriminatory practices in accessing NOS's services;
- Sustainability Policy, which incorporates consumer perspectives into the company's strategy, promoting innovative and sustainable solutions that enhance accessibility and digital inclusion;
- Diversity and Inclusion Commitment Statement, which ensures that NOS products and services are designed to be accessible and inclusive, guaranteeing equal opportunities for all consumers, regardless of their background, gender, or social status.

Detailed Information on each of these policies can be found in section "1.3.1.12. Policies (MDR-P)".

Commitment to human rights and the impact on consumers and end users

(S4-1_02-06) NOS is committed to conducting its business in strict compliance with applicable legislation, fostering a culture of respect for internationally recognised human and labour rights. This commitment aligns with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. These principles guide NOS's operations, ensuring an ethical and responsible approach to its relationship with consumers and end users.

The company takes a proactive stance in preventing negative impacts and, should they occur, makes significant efforts to mitigate their effects. This commitment is reflected in measures that promote professionalism, respect, loyalty, and non-discrimination in customer relations. NOS rejects discrimination based on race, nationality, culture, religion, sex, gender, sexual orientation, age, socio-economic status, educational background, ethnicity, or any physical or mental disability. These values are instilled in employees and agents representing the company in direct interactions with consumers and end users.

NOS ensures strict compliance with the General Data Protection Regulation (GDPR) and other relevant security and privacy regulations. This commitment safeguards the fundamental right to privacy and freedom of expression, with the implementation of rigorous policies and processes to protect data and prevent unauthorised access or misuse. The company also cooperates with authorities in legally regulated situations, ensuring a balance between public security and user rights protection.

Additionally, NOS promotes the responsible use of its products and services, offering specific solutions for vulnerable groups, including people with disabilities, children, and adolescents. These initiatives feature functions that prevent exposure to abusive content, illegal activities, and excessive technology use, fostering a safer digital environment for all.

Digital inclusion and technological literacy are strategic priorities for NOS, which develops programmes aimed at empowering segments of the population with limited access to technology. These initiatives are further supported by awareness campaigns on security and privacy, encouraging a responsible and informed use of the company's services.

Furthermore, NOS follows the precautionary principle concerning the potential adverse health effects of telecommunications infrastructure and equipment. The company provides clear information to enable informed consumer decisions and ensures safe conditions for the use of its products and services.

NOS's policies align with internationally recognised frameworks, including the International Bill of Human Rights, which encompasses the Universal Declaration of Human Rights and the International Covenants on Civil, Political, Economic, Social, and Cultural Rights. The company also upholds the values enshrined in the Portuguese Charter of Human Rights in the Digital Age and the Charter of Fundamental Rights of the European Union.

As a signatory of the CEO Guide on Human Rights by the World Business Council for Sustainable Development (WBCSD), NOS recognises human rights as fundamental freedoms that must be protected without discrimination. This commitment is operationalised through continuous assessment processes, which identify current and potential human rights impacts, and by integrating additional commitments into its principles and policies framework.

Through this comprehensive and proactive approach, NOS ensures that consumers and end users are protected by policies aligned with the highest international standards. This alignment reflects the company's commitment to responsible and sustainable business practices, promoting a positive impact on the communities it serves.

More Information on NOS's commitment to Human Rights can be found in sections "1.3.3.1.2. Policies (S1-1)" e "1.3.3.2.2. Policies (S2-1)"

1.3.3.4.3 Engagement with consumers and end users (S4-2)

(S4-2_01 / S4-2_02 / S4-2_03 / S4-2_04) NOS recognises the importance of including consumers' and end users' perspectives in managing the actual and potential impacts associated with its products and services. This structured and direct dialogue ensures that consumers' and end users' opinions and needs are considered in strategic and operational decision-making, promoting a customer-centric approach focused on continuous improvement.

In the field of cybersecurity, one of the key roles is played by the Chief Information Security Officer (CISO), who reports directly to the Chief Technology Officer (CTO). The specialised cybersecurity team is responsible for areas such as cyber intelligence, offensive security, security architecture, and cyber defence. To ensure compliance with applicable regulations, the company also has a Network Security Officer, whose role is defined under the responsibilities established in ANACOM's Network and Services Security Regulation.

In the area of privacy and data protection, the Data Protection Officer (DPO) plays an essential role, monitoring compliance with data protection standards, cooperating with the National Data Protection Commission (CNPD), and acting as a point of contact for consumers and end users. This commitment to privacy is reinforced by internal legal advisory regarding legal obligations and by the implementation of processes to ensure personal data protection.

Direct engagement with consumers and end users occurs mainly through market research, including individual and group interviews, conducted in two main phases: before launching new products and services, to assess receptiveness and functionalities and, during product or service usage, to measure satisfaction and identify opportunities for improvement. These studies are conducted ad hoc, always ensuring the security and privacy of participants.

(S4-2_05) The effectiveness of this dialogue is assessed through operational, commercial, and satisfaction performance indicators. While positive results are often linked to the implementation of improvements identified through these interactions, NOS acknowledges that the relationship between these metrics may be influenced by multiple interrelated factors, reinforcing the need for a comprehensive approach.

(S4-2_06) The company adopts specific measures to understand the perspectives of vulnerable consumers and end users, including people with disabilities or special needs. Among these initiatives, NOS provides a wide range of communication channels, such as the website, mobile applications, physical stores, customer support lines, the NOS Ombudsman, and the NOS Forum. These channels ensure that customers and users can express concerns and queries regarding NOS's products and services in any context.

To ensure inclusive service, NOS has developed specific solutions, such as video interpreter assistance in sign language for customers with hearing impairments. Customers with a disability of 60% or higher benefit from special conditions when subscribing to services, with details available on the website. For foreign customers, NOS already offers personalised service by managers with the necessary language skills and plans to make pre-contractual documents clearer and more accessible.

Continuous analysis of complaints and feedback, including those received through external platforms such as the "Portal da Queixa", allows NOS to identify areas for improvement and implement corrective actions. This effort resulted in the company leading in customer satisfaction in 2024 across multiple performance metrics.

Beyond problem resolution, NOS proactively invests in innovation, connectivity, and accessibility to prevent social and digital exclusion. This commitment ensures that digital transformation is inclusive and that the needs of all consumers and end users, especially the most vulnerable, are met, guaranteeing that no one is left behind.

1.3.3.4.4 Processes to remedy negative impacts and channels for consumers and end users to express their concerns (S4-3)

(S4-3_01) NOS adopts a rigorous approach to identifying, managing, and addressing material negative impacts caused or contributed to by its operations, with a particular focus on Security and Privacy incidents. Upholding a "zero tolerance" policy towards cybersecurity breaches, the company implements detailed processes covering incident detection, triage, resolution, reporting to regulatory bodies, and communication with affected customers and users. During these stages, specific actions are defined to remediate negative impacts, restore consumer and end-user trust, and minimise potential damage.

The investigation of complaints related to privacy breaches and data loss is conducted in compliance with specific indicators. This process includes internal and external audits and detailed incident investigations. The continuous evaluation of corrective measures helps identify vulnerabilities, implement improvements, and prevent recurrence, ensuring that consumer and end-user rights are safeguarded.

(S4-3_02) NOS provides dedicated channels that enable consumers and end users to voice concerns or needs in a direct and accessible manner. These channels utilise tools such as the Net Promoter Score (NPS) and satisfaction surveys across different stages of the customer journey, from post-sales interactions to responses to specific events. The results are analysed in internal forums and incorporated into continuous improvement initiatives, reinforcing open and transparent dialogue.

Additionally, the company offers dedicated channels for managing privacy-related rights, including a dedicated mailbox and customer service line, as well as automated systems such as the IVR helpline and self-service features in the customer portal. Data subjects can also contact the Data Protection Officer (DPO) directly via email or postal mail for any queries regarding the processing of their personal data. These mechanisms are further supported by cross-functional channels, such as the website, mobile applications, and physical stores, ensuring daily and continuous customer support.

(S4-3_03 / S4-3_04) NOS ensures the effectiveness of its communication channels through its business relationships. This commitment includes the sharing of best practices and the promotion of joint initiatives that expand consumer and end-user access to clear and effective interaction channels. The company combines broad-reaching tools with targeted mechanisms, such as meetings with regulators and investor roadshows, ensuring that stakeholder needs and expectations are integrated into operational and strategic processes.

(S4-3_05) The continuous monitoring of consumer and end-user concerns allows NOS to assess the effectiveness of its communication channels and ensure that stakeholders are appropriately engaged. This dynamic process reflects the company's commitment to maintaining a productive and responsive relationship with consumers and end users, fostering continuous improvement and alignment with stakeholder expectations.

(S4-3_06) Consumers and end users can also use NOS's dedicated channels to seek clarification or report alleged irregularities related to Ethics and Conduct. These channels are regulated under the Whistleblowing Communication Regulation, which establishes clear rules for receiving, recording, and processing reports, ensuring confidentiality, protection against retaliation, and the implementation of appropriate corrective measures. Whistleblowers' rights are legally protected. Within this process, NOS and all involved parties are bound by confidentiality, ensuring that all reported information is treated as confidential and restricted. Requests for clarification and reports of alleged irregularities can be submitted anonymously, for example, by sending an anonymous letter to the provided postal address or by email from a specifically created anonymous account. NOS ensures the anonymity and trustworthiness of this process. Anyone who seeks clarification, raises concerns, reports an alleged irregularity, or

participates in an investigation in good faith is guaranteed protection from retaliation. This commitment is reflected in strong ethical principles and effective mechanisms that ensure a safe and fair environment for reporting misconduct.

1.3.3.4.5 Measures for managing material impacts on consumers and end users (S4-4)

(S4.MDR-A_01-12) NOS recognises the importance of ensuring a safe, inclusive, and transparent experience for its consumers and end users. As a telecommunications and technology company, NOS plays an active role in mitigating risks and maximising opportunities that promote consumer and end-user rights protection, digital security, accessibility, and technological literacy.

To this end, the company implements various measures to manage and mitigate material impacts on consumers and end users, ensuring that its product and service offerings are developed in line with high standards of quality, data protection, privacy, and digital inclusion. These initiatives reflect NOS's ongoing commitment to providing a responsible user experience and contributing to a more sustainable and accessible digital ecosystem for all. Below are the key measures adopted to minimise risks and enhance opportunities for the benefit of consumers and end users.

Security and Privacy

Approach to Security & Privacy

The NOS Security and Privacy (S&P) governance model is based on the Three Lines of Defence model to ensure an effective and segregated distribution of responsibilities within the organisation. The Executive Committee holds ultimate responsibility for this matter within the organisation.

In the 1st line of defence in S&P risk management, various organisational areas bear direct responsibility for ensuring the security and privacy of the processes and assets they own. The 2nd line includes key roles within NOS's S&P approach, notably the Central S&P Team and the S&P Pivots in different areas, as well as the Chief Information Security Officer (CISO) and their Cybersecurity team, the Data Protection Officer (DPO), and the Legal Department. The framework is completed by the 3rd line of defence, comprising Internal Audit and corporate governance bodies that oversee risk-related matters.

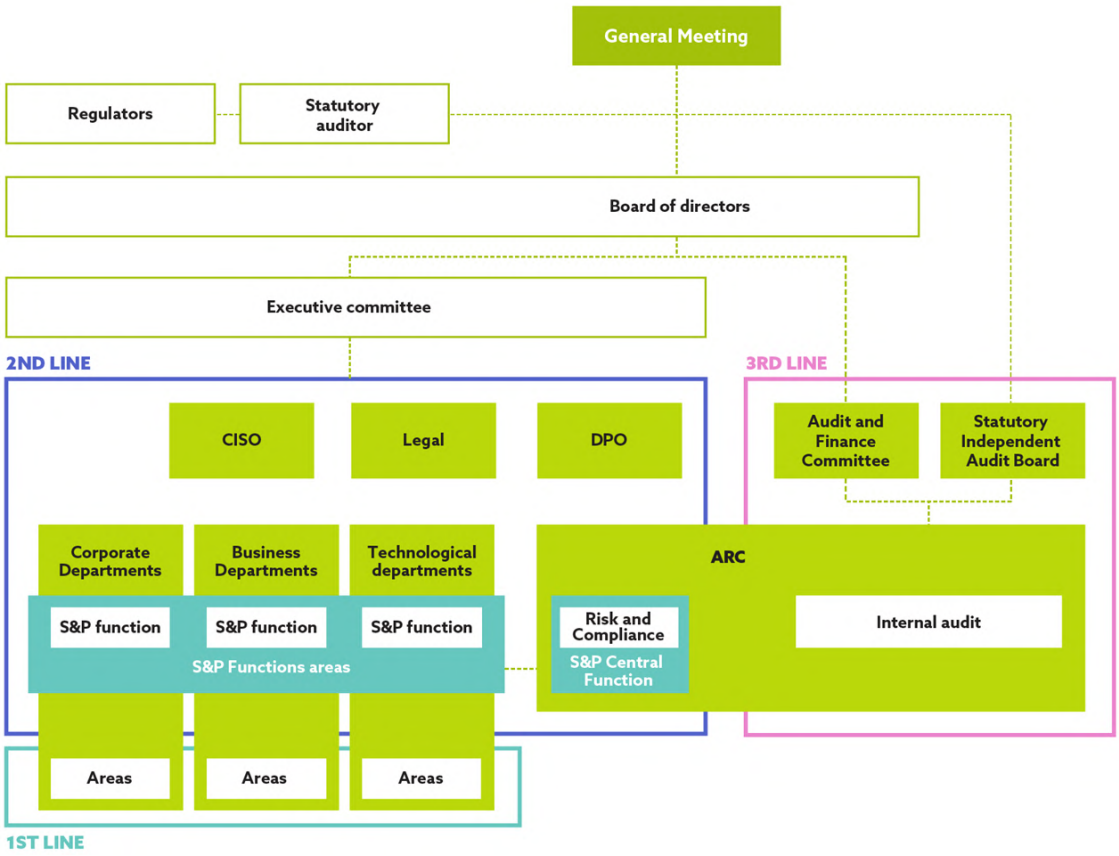
The Information Security Policy (ISP) serves as the guiding framework that defines the organisation's overall S&P stance. It includes the General Information Security Policy and all other S&P regulations and documents, structured within a hierarchical framework.
Security & Privacy (S&P) governance model

NOS's Security & Privacy governance model is designed to address the increasing exposure to security, privacy, and continuity risks, as well as legal and regulatory requirements, which have significantly evolved over the past years.

Following a three-line defence structure, a best-practice approach within Governance, Risk & Compliance (GRC), the Security & Privacy governance model ensures an effective and segregated distribution of responsibilities, clearly defining the roles of key stakeholders and their interactions within the Risk Governance framework.

Across all defence lines, the Executive Committee represents NOS's leadership commitment to Security & Privacy, approving the S&P Governance Model, as well as its strategy and planning, while holding ultimate responsibility for S&P matters within the organisation.

The security and privacy of all individuals interacting with NOS is a critical priority. The company's management approach ensures that customers, employees, suppliers, partners, and other stakeholders have the necessary and appropriate conditions to safely use its services.



First line of defence

In the first line of defence for managing Security & Privacy (S&P) risks, various organisational areas—including Corporate, Business, and Technology divisions—hold direct responsibility for ensuring the security and privacy of their respective assets (processes, systems, products, and services). These areas are responsible for operationalising the defined S&P strategy and managing S&P risks, ensuring compliance with both internal and external requirements.

Second line of defence

In the second line of defence, the following functions play a key role:

The Central S&P Function, which operates within the Audit, Risk, and Compliance Department (reporting to the Chief Compliance Officer – CCO), has a primary role in (i) developing a strategic plan, providing guidelines, and supporting organisational areas in S&P risk management, and (ii) designing methodologies and tools to support the organisation's S&P risk management.

The Chief Information Security Officer (CISO), part of the Quality and Transversal Projects Department (reporting to the Chief Technology Officer – CTO), is responsible for cross-functional oversight of technological security. The Cybersecurity Team, under the CISO's leadership, ensures the security of NOS's technology cluster, working in coordination with the S&P Functions within the technology areas.

The Data Protection Officer (DPO) (reporting to the Chief Financial Officer – CFO) is a key pillar in ensuring the organisation's compliance with data protection and privacy regulations.

The Legal Department (reporting to the CCO) provides advisory support on S&P matters to various responsible stakeholders within the organisation.

The S&P Functions within different business areas act as extensions of the Central S&P Function, ensuring the proper management of S&P risks in their respective domains.

Third line of defence

In the third line of defence within the Security & Privacy governance model, Internal Audit plays an independent role in risk management. Internal Audit reports hierarchically to the Executive Committee and functionally to the Audit and Finance Committee and the Supervisory Board. The primary role of Internal Audit in the S&P Governance Framework is to provide assurance on the reliability of S&P risk management processes across the organisation.

Security & privacy processes

The Security & Privacy (S&P) programmes and processes that NOS develops and maintains practically implement the principles outlined in its policies, allowing the company to effectively manage risks related to availability, integrity, confidentiality, privacy, and cybersecurity. These risks are associated with information/data, processes/assets, and products/services.

NOS's business units, functional areas, and employees are responsible for ensuring the execution and monitoring of security, privacy, and business continuity controls assigned to them. The Central Security & Privacy Team is responsible for defining S&P processes and driving their implementation across the organisation.

Security and Privacy Processes

Planning and Strategy (including S&P Steering Committees)	**S&P Objects** (inventory and risk assessment of assets, activities, and products or services)
Policies and Regulatory Framework	**Record of Processing Activities (RATs)**
Training and Awareness	**Privacy Impact Assessments (PIAs)**
Control and Monitoring (including risk assessments, S&P initiative controls, KRIs)	**Subcontractors**
Security & Privacy by Design	**Business Continuity and Crisis Management** (BCM – Business Continuity Management)
Compliance Support (including changes in legislation and/or S&P regulations, support to business areas)	**S&P Incidents**
	S&P Certifications

Information security management

NOS's Information Security Management (ISM) programme aims to implement processes that protect information and its supporting assets across the three fundamental pillars: availability, integrity, and confidentiality. Information protection must comply with both internal information policies and external laws and regulations.

Additionally, documented service requirements must be considered, including those outlined in agreed service levels, contracts, or operational agreements with customers.

8 Key Domains of Information Security

1. Governance & Risk Management of Security
2. Human Resources Security
3. Security and Operation of Systems & Facilities
4. Information and Communication Management
5. Incident Management
6. Business Continuity Management
7. Monitoring & Auditing
8. Privacy & Personal Data Protection

Key aspects of security management:

- NOS is certified under the ISO 27001 Information Security Management System (ISMS), covering business processes related to installation, activation, account management, service requests, billing, and customer collections in the B2C (Residential) and B2B (Enterprise) segments, as well as security processes related to NOS's Data Center services. The maintenance of this certification is subject to annual Internal and External Audits;
- The Information Security Management System, specifically the ISO 27001 requirements, is mapped within the NOS Internal Control Manual. This manual undergoes periodic Control Self-Assessments carried out by the areas responsible for controls, in collaboration with the Central S&P Team. For non-compliant internal control procedures, corrective actions are defined;
- Regarding security risk management, NOS employs risk-sharing and risk-transfer strategies. Notably, the company holds a Professional Liability Insurance policy, which includes a "Data Protection & Cyber Liability" module, covering information security risks, including own damages and third-party damages.

Cibersecurity management

NOS develops and maintains Cybersecurity initiatives aimed at protecting information and its supporting assets from potential attacks and unauthorised external access, ensuring confidentiality, integrity, and availability. These initiatives focus not only on the definition and implementation of improvements in operational cybersecurity procedures, such as incident

management processes, but also on the continuous monitoring of cybersecurity risks, enabling a proactive approach to mitigating potential vulnerabilities.

Chief Information Security Officer (CISO) and Cibersecurity Team

For cybersecurity-related matters, NOS has appointed Duarte Sousa Lopes as Chief Information Security Officer (CISO), who reports to a member of the Executive Committee, specifically the Chief Technology Officer (CTO), Jorge Graça. The CISO and the specialised Cybersecurity Team, integrated within the company's technology divisions, are primarily responsible for:

Cyber Intelligence and Offensive Security

Monitoring the risk landscape, vulnerability assessment, and internal alignment to reduce technological and process risks

- Monitor technological changes and ensure the re-evaluation of security issues.
- Implement relevant use cases aligned with cybersecurity processes.
- Identify and exploit vulnerabilities, as well as conduct forensic analysis of S&P incidents.
- Identify needs and promote the delivery of targeted cybersecurity training and awareness initiatives.

Security Strategy and Architecture

Collaborative design of the cybersecurity strategy, reducing risk through the implementation of best security practices in networks and information systems. Structured evolution of capabilities based on new platforms and reference architectures.

- Develop the Cybersecurity strategy, aligned with the guidance of the overall strategy and planning proposed by the Central S&P function.
- Develop, implement, and maintain cybersecurity management policies, standards, and procedures (e.g., incident management, security assessments).
- Conduct a comprehensive mapping of security vulnerabilities, maturity indicators, and progress.
- Plan and conduct regular security assessments.
- Coordinate communication with the Network Security Officer, the Central S&P Team, and Regulation regarding security vulnerabilities and the results of network and service security monitoring.
- Take responsibility for managing the security of cloud services, in accordance with Law No. 46/2018.

Cyber Defence

Coordination of cyber defence operations. NOS's official point of contact with the National Cybersecurity Centre.

- Coordinate the Cyber Defence operations and the organisation's Security Operations Center (SOC).
- Create mechanisms for continuous and proactive monitoring of security vulnerabilities.
- Analyse the impact of identified incidents and ensure their containment and resolution.
- Define and implement a response plan for threats, incidents, and critical scenarios.
- Support the notification of incidents that affect the security of networks and services to regulatory bodies and manage internal and external communications during disruption scenarios.
- Support the assessment of the adequacy and sufficiency of the cybersecurity measures implemented by service providers responsible for managing or operating information systems/networks at NOS.

Network Security Officer

NOS also has a Network Security Officer, Jorge Frazão Oliveira, who is the appointed representative for NOS in relation to the Network and Service Security Regulation of ANACOM and the Legal Framework for Cyberspace.

Incident management

At NOS, we promote a "zero tolerance" culture regarding cybersecurity incidents that compromise NOS's information and data. As such, measures are in place in the event of a breach of Security & Privacy (S&P) policies.

In the event of S&P incidents (security, privacy, continuity), NOS has various defined and implemented processes for managing such incidents. These processes specify the procedures to follow during the following stages: detection; triage; handling; reporting to regulatory bodies and communication with affected customers; and, post-mortem analysis of incidents.

It is important to note that:

- All internal employees and partner personnel must report any S&P incidents they become aware of, through the defined channels, and collaborate in the investigation if necessary.
- A breach by a NOS employee of any S&P rule, policy, or procedure within NOS's S&P Policies constitutes a potential disciplinary offence, which may result in sanctions depending on the severity of the breach. The employee may also incur civil and/or criminal liability. In the case of a partner employee, sanctions as stipulated by the relevant legal provisions or contract will be applied through the respective partner/ supplier companies.

Management of personal data protection

For NOS, privacy is a concept within information security related to confidentiality, which involves the protection of information, particularly personal data of customers, employees, and other data subjects. The goal is to ensure compliance with applicable regulations and the fundamental right of each individual to have access to and decide who should have access to their data at any given time.

In this context, and in alignment with the Information Security Management (ISM) programme, NOS has developed and maintains a series of initiatives aimed at implementing processes for personal data protection, while also monitoring and continuously improving compliance with the General Data Protection Regulation and other regulations affecting privacy.

Data Protection Officer (DPO)

For issues specifically related to personal data privacy, NOS has appointed Pedro Cota Dias as the Data Protection Officer (DPO). His main responsibilities include:

***Data Protection Officer* (DPO)**

- Monitor compliance of data processing with the applicable regulations.
- Act as a point of contact for customers, users, or other data subjects for clarifications regarding the processing of their data by NOS.
- Cooperate with the national supervisory authority, CNPD (National Data Protection Commission).
- Provide information and advice to data controllers or subcontractors about their obligations under privacy and data protection laws.

Among the various technical security measures and organisational actions specifically implemented to ensure the protection of personal data (of customers, employees, and other data subjects) by our employees and suppliers/partners, we highlight the following:

- All internal employees and partner employees are required to protect personal data and maintain confidentiality regarding NOS information. Therefore, they are not allowed to share any data they have access to during and as a result of their work with third parties. These obligations remain in effect even after leaving the company (i.e., upon termination of employment or service contracts).

- For internal employees, these obligations are included in the employment contracts or in a "Responsibility Agreement on Information Confidentiality and Personal Data Protection".

- For partners, personal data may be shared with partner companies for processing on behalf of NOS, acting as subcontractors. In such cases, NOS takes the necessary contractual measures to ensure that subcontractors respect and protect personal data. These obligations are part of the Data Processing Agreements signed between NOS and partner companies whose employees may have access to personal data belonging to customers, employees, or other data subjects. Furthermore, partners are responsible for communicating and enforcing these rules with all employees providing services to NOS. Partner employees must sign a "Responsibility Agreement on the Use of IT/IS, Confidentiality, and Personal Data Protection".

- Partners, as subcontractors, are contractually bound to uphold confidentiality and secrecy duties, ensuring the security of the personal data communicated to them for this purpose. They cannot use such data for any other purposes, either for their benefit or the benefit of third parties, nor correlate it with other data they may possess.

- During the selection and contracting process of our partners, "Supplier and Partner Sustainability Requirements" (which include obligations related to Information Security, Personal Data Privacy, and Business Continuity) are communicated, and partners are required to comply with them.

- Internal employees and partner employees are only permitted to access and process personal data to the extent necessary, based on need-to-know and only for permitted and legitimate purposes in accordance with the Record of Processing Activities (RATs). Through its Privacy Policy, NOS informs its customers that data collection, use, processing, or retention requires at least one valid legal basis, such as customer consent, contract execution or pre-contractual measures, legal obligation, and/or NOS's legitimate interest.

- NOS has audit processes to ensure compliance with the Privacy Policy, such as verifying whether access to personal data is performed by employees exclusively for the performance of their professional duties, ensuring personal data protection.

- NOS conducts various types of audits, including Internal Audits (e.g., Access to Personal Data, Information Security), External Audits (e.g., ISO 27001 Certification, External ITGC Internal Control Audit), Continuous Monitoring (e.g., Critical Data/Information Access Circulation), and Incident Audits (e.g., investigation of Security & Privacy incidents).

Business continuity management

NOS develops and maintains a Business Continuity Management (BCM) programme aimed at implementing processes to reduce the risk of disruption to critical business activities or critical products and services, originating from disaster situations, technical-operational failures, or massive human resource failures.

- The processes cover facilities, network infrastructures, and key support activities for critical services. For these areas, resilience strategies, plans, and continuity actions are developed, along with incident/crisis management procedures for Security & Privacy (S&P).

- The continuity processes are periodically subjected to impact and risk analyses, such as Business Impact Analysis (BIA) and Risk Assessment (RA). Some of these specific risk analyses may incorporate Sensitivity Analysis and/or Stress Testing mechanisms.

- Facilities and infrastructures are also periodically subject to audits, tests, and simulations.

- NOS promotes coordination with official external entities for disaster scenarios, critical infrastructure protection, and crisis communication, including, for example, collaboration with ANEPC (National Emergency and Civil Protection Authority).

- In the event of disruptions to the communication services network, customers can check the network status on the NOS website to see if there are planned improvements or unexpected issues. This information is disclosed whenever significant events occur, in accordance with the public information obligation, as outlined by ANACOM (National Communications Authority) sector regulations.

Security & Privacy (S&P) is a critical topic for NOS. The management of this area within our organisation encompasses a governance model with specific roles and responsibilities for S&P, various S&P policies, standards, and processes, as well as a set of programmes with initiatives in information security, cybersecurity, personal data protection, and business continuity.

Security & privacy actions

(S4-4_01 / S4-4_02) In 2024, we continued to develop new initiatives and deepen ongoing efforts in the areas of security, cybersecurity, privacy, and business continuity.

- E-learnings on "Security & Privacy" for employees

We continued to implement the training plan for all employees and partners, which includes the completion of e-learnings on "Security & Privacy". The completion rate for the e-learnings was 83%, both for NOS employees and for partner employees.



NOS Employees

83% completed the 3 Stages, which include the 14 modules of the S&P e-learning (average across the 3 Stages, maintaining the percentage compared to 2023)

Partner Employees

83% of employees from the main NOS Partner Academies completed additional S&P e-learnings (average across the various Academies, representing an increase of +8 pp compared to 2023)

- S&P by design in transformational, structuring projects

Continued integration of S&P by Design requirements in transformational, structuring projects related to Advanced Analytics, Go to Cloud, and Digital Marketing.

- Strengthening cybersecurity capabilities

Continued enhancement of the Cybersecurity team across its various specialties, with the goal of consolidating the model for identifying and mitigating risks and promoting the development of cross-functional capabilities. Ongoing reinforcement of the set of technological tools used for prevention, detection, and response to cybersecurity incidents (e.g., Endpoint Detection and

Response, Threat Intelligence, Vulnerability Management, etc.). Continued proactive actions to identify security vulnerabilities as quickly as possible and strengthening the Vulnerability Management process.

- ISO27001 recertification - Information security

NOS secured recertification under the "ISO27001 - Information Security Management System" standard, covering: business processes related to installation, activation, account management, service requests, billing, and customer collections in the B2C (Residential) and B2B (Enterprise) market segments; and, security processes related to NOS Data Center services (Housing Services).

Actions supporting the sustainability of the portuguese business sector

In addition to Security & Privacy, NOS positions itself as a partner for the digital transformation of its enterprise clients, working alongside the Portuguese technology ecosystem on multiple projects aimed at capitalising on the gains digitalisation can bring to the competitiveness and sustainability of businesses across various sectors. In this context, the NOS Smart Home solution stands out, particularly for the real estate development sector.

- NOS Smart Home

A smart, secure, and efficient home solution developed to enhance the sustainable use of housing, while simultaneously offering comfort, convenience, and peace of mind for its residents. The system integrates various automation features, such as lighting control, shutters, air conditioning, in addition to security and energy efficiency features. This ecosystem is based on an intuitive and easy-to-use interface, allowing for 24/7 control both inside and outside the home. This solution is applied downstream from NOS's activities, covering the real estate development sector and consumers and end-users in mainland Portugal and the islands.

Metrics and targets

1.3.3.4.6 Goals related to the management of material negative impacts, promotion of positive impacts, and the management of material risks and opportunities (S4-5)

Defined goals

(S3.MDR-T_01-13) NOS has set measurable goals associated with its commitments to managing its consumers and end users. These goals directly contribute to the identified material IROs and will be monitored in a structured way to ensure their effective execution.

Commitment: Benefit local communities with the extension of our Next-Generation Networks FttH and 5G

  - o Target: 100% 5G coverage in all municipalities by 2030

- A NOS NOS has set the goal to achieve 100% 5G coverage in all municipalities by 2030, reinforcing its commitment to expanding connectivity and digital inclusion throughout the country. This objective reflects the company's ongoing investment in network infrastructure, ensuring that 5G technology is accessible to all communities, regardless of their location or population density.

- The 5G coverage evaluation is conducted through calibrated theoretical coverage models, validated by external entities, ensuring rigorous monitoring of this commitment's progress. In 2024, NOS achieved 97.1% indoor 5G coverage and 99.6% outdoor coverage, as well as 100% 5G coverage in municipalities. However, expanding coverage to the municipalities presents additional challenges, particularly in low population density areas. To mitigate these barriers, NOS has defined a strategic plan to achieve over 90% coverage in the least populated municipalities by the end of 2025, in compliance with the regulatory requirements of ANACOM.
- This goal was set with the involvement of NOS employees and reflects the company's commitment to leading the digital transition in the country. The implementation of this objective will be continuously monitored, ensuring that 5G reaches all regions equitably and contributes to the socioeconomic development of the communities.
- With this initiative, NOS strengthens its position as a leader in innovation and digital infrastructure, promoting a more connected, accessible, and technologically advanced future for all citizens.

Commitment: Benefit local communities with the extension of our Next-Generation FttH and 5G networks

  - Target: €500 million investment in 5G by 2030

- NOS has set the goal to invest €500 million in 5G by 2030, reaffirming its commitment to digital transformation and the construction of a robust telecommunications infrastructure for the future. This investment will enable the continuous expansion of the 5G network nationally, ensuring greater coverage, performance, and service quality for consumers and businesses.
- The investment in 5G coverage follows a structured plan, with a concrete and forecasted budget, ensuring rigorous monitoring of financial execution and network progress. This goal was set with the involvement of NOS employees, reflecting a strategic vision that aligns technological innovation with the sustainable development of the telecommunications sector in Portugal.
- By 2024, NOS has already invested €466 million in 5G expansion, contributing to improved coverage and network capacity. The progress of the investment will be monitored throughout the strategic cycle, ensuring that the infrastructure meets the needs of the market and society.
- With this initiative, NOS strengthens its role as a leader in the telecommunications sector, driving connectivity and ensuring that 5G becomes a driver of innovation, productivity, and digital inclusion in Portugal.

Commitment: Benefit local communities with the extension of our Next-Generation FttH and 5G networks

  - Target: 100% fibre coverage across the country by 2030

- NOS has set the goal to achieve 100% fibre (FTTH) coverage across the country by 2030, consolidating its commitment to expanding connectivity and digital inclusion at a national level. This objective reflects the company's strategic vision to ensure that all

homes, regardless of their location, have access to next-generation network infrastructure.

- The percentage of fixed network coverage is calculated by dividing the number of homes with FTTH coverage by the number of homes validated and certified by CTT in mainland Portugal. The achievement of this goal is linked to the successful completion of the white zones coverage project, currently in tender, which will allow expansion into under-served areas.
- In 2024, NOS's fibre coverage reached 68% nationwide, representing significant progress in the expansion of the infrastructure. NOS will continue to work strategically to increase coverage and ensure that the 100% goal is achieved, ensuring a positive impact on communities and promoting digital inclusion across the country.
- With this initiative, NOS reinforces its position as a leader in connectivity and digital infrastructure, contributing to socioeconomic development and a more connected and accessible future for all Portuguese citizens.

1.3.4 GOVERNANCE

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1.3.4.1 ESRS G1 – Business conduct

1.3.4.1.1 Management of impacts, risks, and opportunities (IRO-1)

Business Conduct is a key pillar of the company's ESG strategy, guiding the management of impacts, risks, and opportunities in an ethical, responsible, and transparent manner. Aligned with our Sustainable Business Model (SBM), this approach reflects the company's commitment to organizational practices that promote integrity, responsibility, and alignment with strategic objectives.

In the context of materiality analysis and the criteria set by the ESRS, the following priority subtopics of Business Conduct have been identified, which guide the company's actions:

- Corporate culture, which is based on values of integrity and ethics, promoting an inclusive and responsible working environment;
- Political context and representation of interest groups, ensuring transparent and ethical interaction with institutional and political stakeholders, aligned with our corporate values;
- Supplier relationship management, including payment practices, promoting a value chain based on ethical and sustainable relationships, with fair payment practices.

The management of these subtopics is integrated into the company's internal processes to identify, assess, and mitigate impacts and risks. Regarding corporate culture, we continually reinforce the communication of ethical policies and practices at all levels of the organization. With regard to the political context, we ensure the rigorous monitoring of representation and lobbying activities, ensuring alignment with our ESG commitments and complete transparency. Lastly, in supplier management, we implement ESG criteria in selection and evaluation policies, ensuring that our value chain reflects our ethical and sustainability standards.

This approach to Business Conduct strengthens organizational resilience and the trust of our stakeholders, contributing to a sustainable business model aligned with the Sustainable Development Goals (SDGs).

1.3.4.1.2 Policies (G1-1)

Business conduct and corporate culture are fundamental elements of the company's strategy, reflecting the commitment to integrity, responsibility, and transparency in all aspects of its operations. These guidelines are translated into Policies and Codes that guide both internal and external behavior, promoting ethical practices, trust-based relationships with stakeholders, and an inclusive and sustainable organizational environment.

Our Policies and Codes, approved by the governing bodies, including as appropriate by the Board of Directors and/or the Executive Committee, reflect the commitments and principles that guide the systematic and continuous management of the main impacts of our operation and value chain. Supported by the concepts and principles of relevant intergovernmental instruments, these documents structure our approach to business conduct, ensuring alignment with ESG criteria, the Sustainable Development Goals (SDGs), and the highest standards of good governance.

The management of the identified material topics – such as corporate culture, political context, interest group representation activities, and supplier relationship management, including payment practices – is integrated into our sustainable management system, which includes a cross-functional policy and a set of specific policies. These policies cover essential areas to ensure ethics in institutional relationships, fairness in business practices, and transparency in the supplier and partner chain.

Developed to identify, prevent, mitigate, or offset negative impacts and enhance positive ones, our Codes and Policies are also key tools to ensure compliance with regulatory obligations and promote ethical conduct. These documents are regularly updated to reflect new emerging risks and challenges, highlighted through our stakeholder engagement mechanisms.

Clear and accessible communication with different stakeholders has been critical to ensure the implementation and compliance of these policies, both in the company's operations and in the supplier and partner chain. This ensures that all employees and partners understand the expected conduct, reinforcing the collective commitment to building a sustainable and socially responsible business model.

All of our Codes and Policies are publicly available in the institutional section of our website, reinforcing our commitment to transparency, good governance, and strengthening our corporate culture and business conduct.

In the specific context of managing the impacts of business conduct and corporate culture, the following policies stand out:

- Code of Ethics, which establishes the fundamental principles of integrity, transparency, and responsibility guiding NOS's operations and all of its employees.
- Code of Ethics – Summary Version for Partners and Suppliers, which defines the ethical commitments expected from Partners and Suppliers collaborating with NOS, ensuring alignment with the company's values and practices.
- Code of Conduct for Preventing and Combating Workplace Harassment, which strengthens the creation of a safe and respectful professional environment, preventing inappropriate behavior and ensuring effective reporting mechanisms.

- Code of Conduct for the Prevention of Corruption and Related Offenses, which establishes clear rules for mitigating corruption risks and promoting transparent business practices aligned with applicable legislation.
- Prevention Plan for Risks of Corruption and Related Offenses, which sets concrete measures to identify, evaluate, and mitigate corruption risks and related offenses, reinforcing NOS's commitment to responsible governance.
- Guide for Responsible Online Presence, which guides employees' digital conduct, promoting ethical and secure behavior in the digital environment and on social media.
- Guide for Responsible Online Presence – Version for Partners and Suppliers, which adapts these guidelines to external entities interacting with NOS, ensuring consistency in digital communication and protecting the company's reputation.
- Human Rights Policy, which ensures respect for the fundamental rights of all NOS stakeholders, promoting non-discrimination, inclusion, and compliance with international human rights principles.
- Gender Equality Plan 2025, which defines strategies and initiatives to promote gender equity within the organization, ensuring equal opportunities and reinforcing NOS's commitment to diversity and inclusion.

Detailed Information on each of the policies can be found in the section "1.3.1.12. Policies (MDR-P)".

Establishment of corporate culture

NOS bases its corporate culture on clear principles of purpose, mission, vision, and values, fostering an environment of excellence, innovation, and ethical responsibility. The commitment to ethical and responsible conduct extends to all stakeholders – employees, customers, suppliers, and business partners – requiring daily alignment in all interactions.

Professionalism, integrity, transparency, and independence are the pillars that structure NOS's market presence, guiding its conduct across all activities and relationships. These principles not only reflect the company's identity but also represent a commitment upheld by its employees in the way they work with each other and within the organization.

In this regard, NOS maintains an ongoing commitment to responsible communication practices, ensuring that transparency and trust underpin its relationships with customers and other stakeholders.



Corporate culture assessment

To ensure the continuous evolution of its organizational culture, NOS conducts annual evaluations, analyzing aspects such as learning, employee satisfaction, and ethical conduct. Additionally, the Board of Directors and internal committees conduct annual self-assessments, focusing on diversity, skills, and representativeness.

Externally, NOS's corporate culture has been recognized through awards and international certifications, including the Bloomberg Gender-Equality Index, CDP Climate Change, ISS Quality Score, Moody's ESG Solutions, and MSCI ESG Ratings, reinforcing the positive impact of its approach.

To ensure an ethical and transparent organizational environment, NOS has implemented a robust system for identifying, reporting, and investigating unlawful behaviors or actions that contradict its Code of Conduct and internal policies. This system is designed to uphold transparency, compliance with ethical principles, and respect for the rights of all parties involved.

Our organizational culture of ethics

The firm commitment to acting ethically and responsibly towards employees, customers, suppliers, and business partners requires daily alignment from all stakeholders. Professionalism, integrity, transparency, and independence are core ethical and responsible business principles at NOS. These principles structure the company's market presence, guiding its business activities and stakeholder relationships. They also represent a commitment upheld by all employees in their interactions with each other and with the company. NOS also continues to uphold responsible communication principles with its customers.

To establish ethics as a fundamental pillar of its corporate culture, NOS integrates its values and principles into multiple company processes. Together, these processes reflect how the company embeds environmental and social responsibility into its management practices. The management of NOS's ethical commitments is supported by a documented framework, consisting of various tools, monitoring mechanisms, and stakeholder engagement initiatives, as detailed below.

1. Tools that structure our commitment to ethics

- Code of Ethics
- Code of Ethics – Summary Version for Suppliers and Partners
- Code of Conduct on the Prevention of Corruption and Related Offenses
- Prevention Plan for Risks of Corruption and Related Offenses
- Guide for Responsible Online Presence
- Guide for Responsible Online Presence – Version for Partners and Suppliers
- Code of Conduct for the Prevention and Combat of Workplace Harassment
- Gender Equality Plan
- Whistleblowing Regulation

2. Monitoring compliance with our values and principles

- Clarification Request Channel
- Alleged Irregularities Reporting Channel

3. Stakeholder engagement to strenghten alignment with our values and principles

- Annual Communication and Training Plan for Employees, Suppliers, and Partners

1. Tools that structure our commitment to ethics

Code of Ethics

- Its fundamental objective is to share a set of principles and rules that should govern internal and external relationships between NOS Group companies and their stakeholders.
- It must be adhered to by all members of governing bodies and employees of NOS, as well as, with the necessary adaptations, by all those who represent or provide services to NOS Group.
- First published in 2015, it underwent a first revision in 2020 and was most recently updated in 2022 to ensure alignment with legislation on Prevention of Corruption and Related Offenses.

Code of Ethics - Summary version for suppliers and partners

- Aims to promote understanding and adoption of the principles and rules outlined in the Code of Ethics among suppliers and partners.
- Since 2016, NOS has adopted the practice of providing a summary version of the Code of Ethics to these stakeholders, who must ensure its strict compliance.



Code of Conduct for the Prevention of Corruption and Related Offenses

1. Originating from a legal obligation, this Code establishes a set of principles, values, and rules of conduct applicable across all NOS activities regarding Corruption and Related Offenses. It was created and first published in 2022.
2. It must be read in conjunction with other existing rules and policies in force at the company, particularly the Code of Ethics and the Whistleblowing Regulation.

3. It incorporates the rules governing the acceptance and offering of benefits.
4. It designates the Regulatory Compliance Officer (RCN) or Chief Compliance Officer (CCO), Filipa Santos Carvalho, as the person responsible for the adoption and implementation of this Code and the compliance programs derived from it.
5. It applies to all members of governing bodies, executives, and employees of NOS, as well as, with the necessary adaptations, to all individuals representing NOS, including partners and any person or entity providing services, whether on a permanent or temporary basis, to NOS.

Prevention Plan for Risks of Corruption and Related Offenses

- Originating from a legal obligation, this Plan should be interpreted in conjunction with other existing rules and policies in force at NOS, particularly the Code of Conduct for the Prevention of Corruption and Related Offenses. It was created and first published in 2022.
- It enables NOS to identify potential risks of corruption and related offenses (RCIC) and their respective causes, establish preventive and corrective measures to reduce the likelihood and impact of RCIC, define monitoring mechanisms and evaluate the effectiveness of the Plan's implementation, and create a deterrent environment against any corrupt practices and related offenses within NOS.
- In the "Risk Assessment" section of this Plan, the activities and business areas most susceptible to exposure to the risk of corruption and related offenses are identified. Overall, the level of exposure to this risk ranges from low to medium, with no high-risk situations identified.

2. Monitoring compliance with our values and principles: Reporting and inquiry channels

Requests for clarification or concerns related to compliance with the Code of Ethics and/or the Code of Conduct for the Prevention of Corruption and Related Offenses, originating from Employees, Partners, Suppliers, Customers, or third parties, are addressed through dedicated channels available on NOS's website and intranet.

- Reporting alleged irregularities: comunicar.irregularidades@nos.pt or Apartado 4035, Loja CTT Senhora da Hora, 4461-901 Senhora da Hora
- Requests for clarification: duvidas.etica@nos.pt
- These channels for receiving inquiries and reporting irregularities are published on NOS's website in both Portuguese and English. They are available 24/7 to receive such requests and communications.

NOS and all involved parties are bound by a duty of confidentiality, ensuring that all information communicated is treated as confidential and restricted. Requests for clarification and reports of alleged irregularities may be submitted anonymously (e.g., by sending an anonymous letter to the postal address provided above or by using an email address created specifically for this purpose). NOS guarantees anonymity and trust in the process. For those who seek clarification, raise concerns, report an alleged irregularity, or are involved in an investigation in good faith, NOS ensures protection against retaliation.

All received communications are processed by Internal Audit and subsequently forwarded to the Ethics Committee or Supervisory Board, depending on the nature of the issue (ethics-related or specifically related to corruption).

Activity indicators of reporting channels

Annual indicators of activity for the reporting and inquiry channels are compiled and disclosed internally to employees. In 2024, these indicators revealed that:

- 16 inquiries were received through these channels.
- 23 alleged irregularities were reported, of which 12 were confirmed after investigation, leading to warnings, reprimands, or other forms of sanction.

3. Stakeholder engagement to strengthen alignment with our values and principles

NOS defines and implements annual ethics action plans, which include training and communication initiatives on this subject. The regular execution of these initiatives ensures that we share the necessary information so that employees and other stakeholders understand our principles and codes of conduct and know how to act if they detect a potential irregularity or require additional information or clarification.

In this regard, NOS develops and executes annual ethics action plans. The training and communication initiatives are targeted at employees, partners, and suppliers, aiming to enhance awareness and understanding of the Policies and Codes related to ethics and conduct. These actions promote greater clarity and alignment regarding behaviors that may be considered unethical.



E-learning on ethics

The training plan for employees includes a mandatory e-learning module on the Code of Ethics, which is completed during the onboarding process for new employees. As part of this training, employees are required to sign an individual commitment declaration confirming their adherence to the Code.

By the end of 2024, 97% of NOS employees had completed this e-learning maintaining the same percentage as in 2023).

Main objectives of the ethics e-learning:

- Understand the NOS Code of Ethics and the policies related to specific ethical topics;
- Learn about the ethical principles and rules that guide the Group;
- Recognize the role and responsibilities of each employee in upholding these principles and rules in daily work;
- Understand how individual behaviour impacts NOS as an organisation;
- Know the available channels for reporting alleged irregularities or seeking clarifications;
- Obtain information on and understand how to use the whistleblowing channel.

Let's talk about ethics

"Let's talk about Ethics" is a series of open discussions on business ethics. These sessions are targeted at employees and include participation from the Ethics Committee. The objective is to reinforce the importance of ethical issues within the Group, clarify the role of the Ethics Committee, foster trust in existing processes, and address any questions or concerns about ethics. This initiative demonstrates the Ethics Committee's commitment to transparency and openness in addressing ethical dilemmas. Participants have highlighted increased trust in the organisation due to the proximity with the Ethics Committee and acknowledge ethics as a key factor in maintaining the company's reputation. In the 2024 edition, the session, broadcast live online, had an audience of approximately 250 employees. The session focused on Psychological Safety, featuring the Chair of the Ethics Committee, the Executive Board Member from the Ethics Committee, and an external guest speaker, a professor at NOVA SBE Executive Education, specialising in 21st-century human skills, particularly creativity and creative thinking.



~250
Number of participants



4.6
Overall session rating



4.8
Relevance of the initiative and the topics addressed

Actions for suppliers and partners

Employees of each partner or supplier who act on behalf of NOS are required to adhere to the principles and rules outlined in the Code of Ethics, with the necessary adaptations specified in the summary version for Suppliers and Partners, as well as in the Code of Conduct for the Prevention of Corruption and Related Offences. Whenever confronted with alleged violations of these Codes within the framework of their contractual relationship with NOS, the Partner or Supplier must report such incidents through the designated channels. Employees of Suppliers

and Partners who provide services in organisational units identified as having higher exposure to ethical risks also participated in ethics training sessions in 2023, with the format tailored to each unit's needs. By the end of the year, more than 6,200 employees from Partner organisations had completed this training.

1.3.4.1.3 Management of supplier relationship (G1-2)

NOS is committed to the continuous improvement of suppliers and partners, recognising them as crucial links that ensure operational excellence and contribute to delivering high-quality service to customers. The company also requires alignment from its suppliers and partners with the ethical, environmental, and socially responsible conduct principles set out in its policy framework and guiding codes.

The requirements and principles established in NOS's policies and codes, along with its communication, training, and evaluation processes, serve as key drivers for alignment and service improvement. These mechanisms not only enhance service delivery to NOS but can also positively influence the internal management standards of suppliers and partners, as well as the competencies and practices of their employees. Consequently, these initiatives can generate value-added benefits that extend beyond the direct relationship with NOS.

Alignment, prevention, monitoring, and control mechanisms

NOS has implemented mechanisms to influence and maintain alignment within its supply chain, ensuring that it upholds the excellence, values, and standards the company promotes in environmental, social, and governance (ESG) matters. These mechanisms contribute to the prevention, identification, and mitigation of potential risks and negative environmental, human rights, and labour impacts, as well as other fundamental rights-related issues.



Supplier selection

Given the crucial role of suppliers and partners in its operations, NOS places particular emphasis on the selection process and relationship management. Through its Procurement Manual, NOS ensures that the best purchasing practices are implemented across the Group, establishing rules and principles for supplier consultation, contract awarding, and process oversight. This approach ensures careful risk management, maximises value creation, and fosters healthy, long-term relationships with suppliers.

Supplier selection is conducted based on objective criteria, considering technical, economic, and compliance requirements, as well as necessary certifications. This process is managed through a trusted electronic platform, widely recognised in the market. Upon the formalisation of agreements, a survey is conducted among technically approved suppliers to assess their satisfaction regarding the negotiation process, the quality of information provided, and the ease of use of the platform.

Additionally, evaluation processes are in place that incorporate ethical, environmental, and health & safety criteria for potential suppliers, allowing for an initial risk assessment before engagement. As a result, there is a very low incidence of non-compliance or service inconsistencies from suppliers, while maintaining high satisfaction levels regarding the procurement process.

Some of these mechanisms—such as supplier selection and the evaluation of services provided—also ensure the application of fair and transparent business practices, promoting equal access and healthy competition in supplier relationships.

Evaluation of supplies/services provided

Supplier evaluation is a critical element in NOS's value chain management, ensuring quality standards and practices aligned with the company's sustainability commitments. This process integrates the analysis of service quality and the ESG performance of suppliers, promoting a holistic approach focused on continuous improvement.

1. Evaluation of service quality

The evaluation of suppliers in the context of supplies and services provided is essential to identify improvement opportunities, ultimately driving performance across the supply chain. This process is conducted annually and applies to selected suppliers based on criteria such as business relevance and criticality, billing volume, direct interface with NOS customers on behalf of the company, or previous evaluations below 70%, among others.

The evaluation methodology includes eight analysis criteria, covering both operational aspects and, since 2019, ESG criteria. These criteria have associated metrics and weightings, ensuring objectivity and comparability between assessments.

For suppliers with overall scores below 70%, a continuous improvement plan is implemented. This includes alignment meetings between the supplier's representatives and NOS teams, as well as intermediate evaluation processes. This focus on continuous improvement strengthens service excellence and provides selection or disqualification rationales for future contracting processes.

Supplier evaluation process analysis criteria
▪ Proactivity, competitiveness, customer orientation, responsiveness to requests, and problem resolution ▪ Compliance with contractual conditions, Service Level Agreements (SLAs), and Service Level Objectives (SLOs) ▪ Adherence to deadlines, delivery time, response time, and issue resolution ▪ Quality of technical and operational performance and level of service support ▪ Quality of materials, products, and services ▪ Ethics ▪ Environmental, Health & Safety (EHS) standards ▪ Security & Privacy (covering security, privacy, and resilience of products and services, including the sharing of best practices, among other aspects)

1. ESG performance evaluation

The ESG evaluation system at NOS is overseen by the Executive Committee and involves collaboration between the Investor Relations & Sustainability Department, the Audit, Risk & Compliance Department, and the Procurement Department.

This evaluation model is based on a structured questionnaire and an assessment framework, covering topics related to environmental, social, and responsible governance performance. Key assessment areas include human rights impact, security, and privacy, with suppliers required to provide supporting evidence for their responses. The system also includes a scoring mechanism, enabling benchmarking and tracking of performance trends over time.

Suppliers are evaluated based on three risk criteria:

- Environmental risk, accounting for 62% of greenhouse gas (GHG) emissions associated with procurement of goods and services in categories 1 and 2 of Scope 3 emissions (GHG Protocol);
- Business risk, related to the supplier's importance in supporting the development or maintenance of NOS operations;
- Geographical risk, linked to sector- or country-specific environmental and social risk exposure (as per the S&P ESG Risk Atlas).

Evaluation results

In 2023, NOS strengthened its supplier evaluation process, further integrating quality and ESG criteria into its supply chain performance assessment. The results highlight the effectiveness of the implemented initiatives and the continuous evolution of the evaluation model.

Quality of service evaluation

- The 2023 evaluation covered 169 suppliers, with only 4% (7 suppliers) scoring below 70%. The key highlights include:

- 162 suppliers scored ≥70%, representing 96% of all evaluated suppliers, the same percentage as the previous year, indicating an overall positive performance.
- Ethical considerations: Three suppliers recorded an average score below 70%, marking an improvement compared to the previous year's assessment.
- Environmental and occupational health & safety criteria: No supplier in these categories received a score below 70%, maintaining the same positive trend as the previous year.
- Suppliers scoring below 70% were subject to continuous improvement plans, including alignment meetings and interim evaluations. These measures aimed to enhance supplier performance and ensure compliance with NOS's required standards.

ESG performance evaluation

In 2023, the implementation of the ESG evaluation model began with the dissemination of the questionnaire and assessment framework to 174 critical suppliers, selected based on environmental, business, and geographic risk criteria. The preliminary results include:

- Raising awareness among critical suppliers about the importance of ESG practices, aligned with NOS's sustainability commitments.
- The collection of initial data for future analyses and benchmarks, allowing the identification of trends and areas for improvement.

Supplier evaluation system specifically focused on assessing ESG practices and Security & Privacy



ESG EVALUTATION PROCESS OBJECTIVES

- Align suppliers with NOS's established sustainability targets;
- Demonstrate ESG commitment and encourage suppliers to prioritise sustainability measures and collaborate with NOS in this domain, promoting knowledge sharing;
- Minimise risks and enhance resilience within the supply chain through data collection and analysis of metrics;
- Promote transparency regarding the criteria and processes involved in the assessment system;



PHASES OF THE PROCESS

- Selection of suppliers for assessment based on risk criteria, considering three types of risk (environmental, business, and geopolitical);
- Implementation of an ESG performance survey for suppliers and collection of information, managed through a dedicated platform;
- Processing of responses and classification of ESG and Security & Privacy risks according to a defined matrix managed within the platform;
- Integration of results into supplier management decisions and improvement plans;



FEATURES OF THE QUESTIONNAIRE

The questionnaire includes various areas of analysis, such as:

- Environmental Management;
- Eco-design and biodiversity;
- Resource consumption and waste;
- Carbon footprint;
- Labour practices;
- Human rights;
- Initiatives within the supply chain;
- Anti-Corruption policies and measures;
- Compliance, Security and Privacy;

Risk Management and Internal Control System

The NOS risk management and internal control system encompasses various types of risks, including Ethics and Corruption Prevention, Social Responsibility, Human Rights, Diversity and Inclusion, Occupational Health and Safety, Security & Privacy, Partner/Outsourcing Management, Employee/Partner Fraud, Sustainable Products and Services, Environmental Impacts, and Climate Change.

Whenever any of the aforementioned risks, or others directly related to responsible management topics, exceed the acceptable threshold—whether within internal operations or across the supply chain—they become subject to appropriate processes or initiatives to address or mitigate them.

Supplier/partner training

To enhance awareness and ensure partners' commitment to our standards and objectives, NOS offers various training programmes tailored to employees of partner companies. These training sessions cover topics related to organisation-wide and value chain risks, including Ethics, Security & Privacy, Workplace Safety, among others.

The most common and recurring training sessions focus on areas such as ethics and conduct, information security, personal data protection, occupational health and safety, environmental management and sustainability, as well as commercial and customer service techniques.

Sustainability and environmental management, in particular, are addressed both in training sessions for company-owned and franchised stores, as well as through the NOS Academia online platform, designed for sales and commercial teams.

Ethics channel

Requests for clarification and questions regarding compliance with the principles and rules outlined in the NOS Code of Ethics can be submitted in writing by partner and supplier employees through the dedicated channel: duvidas.etica@nos.pt.

Irregularities reporting channel

Reports of alleged irregularities related to compliance with the principles and rules outlined in the NOS Code of Ethics can be submitted in writing by partner and supplier employees through the dedicated channels:

- comunicar.irregularidades@nos.pt
- Apartado 4035, Loja CTT Senhora da Hora, 4461 - 901 Senhora da Hora

NOS and all parties involved are bound by a duty of confidentiality, ensuring that all communicated information is treated as confidential and restricted. For those seeking clarification, raising concerns, reporting an alleged irregularity, or being involved in its investigation in good faith, NOS guarantees protection against retaliation.

These channels are available for supplier or partner employees whenever deemed necessary and operate 24/7, allowing alerts to be raised in response to any suspected violations of principles and rights established by NOS, legally enshrined, or included in international conventions on fundamental human and labour rights.

As part of internal control procedures, audits and investigations are conducted whenever there are suspicions of incidents related to Ethics and Corruption. The outcomes of these processes are correlated with the ethics indicators disclosed in our Integrated Management Reports.

Certifications and other forms of assessment, awareness, and commitment

The Management Systems associated with ISO certifications require the implementation of an internal compliance audit programme and external certification audits. These serve as mechanisms for evaluation and identification of non-conformities and areas for improvement in terms of Quality (ISO 9001), Environment (ISO 14001), Occupational Health and Safety (ISO 45001), Information Security (ISO 27001), and IT Service Management (ISO 20000). The

procurement and supplier management processes are covered by these audits and certifications.

Payment policy

(G1-2_01) NOS adopts a structured and responsible approach to managing supplier relationships, promoting good commercial practices, ethical alignment, and sustainability throughout its supply chain. This commitment is reflected both in its payment policy and in its broader approach to supplier relations, with a strong focus on risk mitigation and the promotion of positive sustainability impacts.

NOS's policy applies to all suppliers, including small and medium-sized enterprises (SMEs), ensuring fair and transparent payment terms. The standard payment term is 90 days (0090). Any changes to these conditions require formalisation through a contract signed by a member of the Executive Committee or approval via email, ensuring alignment between the procurement and finance records.

Payment processes follow a weekly routine, with approved and unlocked documents included in proposals due within 13 days. For suppliers with outstanding debts to NOS as customers, payments may be suspended for review or reconciliation. Additionally, in the final month of each quarter, invoices overdue for the past eight days are not processed. These procedures ensure punctuality and fairness in payments, fostering equitable business relationships with all companies, including SMEs.

Metrics and targets

1.3.4.1.3 Payment practices (G1-6)

(G1-6_02) NOS adopts a structured and responsible approach to managing supplier relationships, promoting good commercial practices, ethical alignment, and sustainability throughout its supply chain. This commitment is reflected both in its payment policy and in its broader approach to supplier relations, with a strong focus on risk mitigation and the promotion of positive sustainability impacts.

NOS's policy applies to all suppliers, including small and medium-sized enterprises (SMEs), ensuring fair and transparent payment terms. The standard payment term is 90 days (0090). Any changes to these conditions require formalisation through a contract signed by a member of the Executive Committee or approval via email, ensuring alignment between the procurement and finance records.

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Standard payment terms by supplier category

NOS's standard payment terms are established to ensure consistency and alignment with applicable commercial and regulatory practices, promoting efficient supply chain management. In general, suppliers are set up with a 90-day payment term. Any changes to these conditions require submission of a contract specifying the agreed term, signed by an Executive Committee

member responsible for the area, or written authorisation via email. It is also ensured that payment terms in procurement and financial systems are consistent and without discrepancies. However, there are exceptions to the general 90-day payment term, grouped into the following main categories:

- Regulatory and Institutional Suppliers
  This includes entities such as regulators, banks, municipalities, associations, and institutions that require prompt payment due to their institutional and contractual nature.

- Critical Operational Suppliers
  Suppliers providing essential services such as energy, water, freight transport, telecommunications, and security are subject to shorter payment terms, generally between 0 and 30 days, due to the criticality of these services for NOS's operational continuity.

- Partnership and Strategic Project Suppliers
  This category includes suppliers involved in programming, advertising, and events, with payment terms varying between 30 and 60 days, adjusted to the nature of the projects and partnership commitments.

- Business Support Service Suppliers
  Suppliers offering consultancy, outsourcing, training, and customer support services have a 90-day payment term, aligned with market practices for these categories.

Payment-related performance indicators

NOS aims to ensure efficient and responsible payment management, fostering fair commercial relationships aligned with the contractual terms established with its suppliers. To monitor performance in this area, the following key indicators are highlighted:

Average payment time

(G1-6_01) NOS's average payment time is 3 days before the due date. This figure represents the difference between the due date and the actual payment date, based on the weighted average of values across the NOS Group.

Percentage of payments in line with standard terms

(G1-6_03) In 2023, 61% of payments made by NOS were processed within the standard contractual payment term.

Number of legal proceedings for late payments

(G1-6_04) Currently, there are no ongoing legal proceedings related to late payments. NOS remains committed to the responsible and prompt resolution of any disputes, ensuring clear and cooperative communication with suppliers to prevent similar situations in the future.

1.3.4.1.4 Targets related to the management of material negative impacts, the promotion of positive impacts, and the management of material risks and opportunities

Defined targets

NOS has established measurable targets aligned with its commitments to corporate governance, ensuring the adoption of ethical, transparent, and responsible practices. These targets directly contribute to the identified material IROs and will be systematically monitored to ensure their effective implementation and the continuous evolution of management standards.

Commitment: Implement risk assessment processes and mitigate environmental and social impacts within the supply chain

- Target: ESG performance assessment of 100% of relevant suppliers by 2030

- NOS has set a target to ensure that 100% of relevant suppliers are assessed against ESG criteria by 2030, reinforcing its commitment to a more sustainable, ethical, and responsible value chain. This initiative aims to ensure that suppliers adopt environmental, social, and governance practices aligned with NOS's sustainability commitments, fostering a positive impact throughout the supply chain.

- In 2023, NOS began implementing the ESG assessment model by distributing a questionnaire and evaluation framework to 174 critical suppliers, selected based on environmental, business, and geographic risk criteria.

- As the ESG assessment implementation progresses, NOS will continue to expand the scope of analysis and strengthen supplier engagement, ensuring that the 100% assessment target is effectively and meaningfully achieved by 2030.

- Through this initiative, NOS reinforces its role in promoting a more sustainable business ecosystem, encouraging responsible practices, and driving ESG transformation across its value chain.

Commitment: Acting ethically and responsibly with our employees, suppliers, and business partners while ensuring the highest standards of governance

- Target: Annual improvement in employees' evaluation of the company's ethical performance

- A NOS is committed to continuously strengthening its ethical culture and corporate integrity, promoting high standards of conduct across all its operations. To track and ensure progress on this commitment, the company has set a target for the annual improvement of employees' evaluation of the company's ethical performance, reflecting internal perceptions of how NOS conducts its business with responsibility and transparency.

- In 2024, the ethical operation index recorded a score of 91%, according to the results of the organisational climate survey. This indicator demonstrates a strong recognition by employees of NOS's ethical practices, while also reinforcing the need for an ongoing

commitment to fostering a culture of trust, respect, and compliance with principles of responsible governance.

- To achieve continuous improvement in this index, NOS will continue implementing training initiatives, awareness-raising actions, and the reinforcement of ethical reporting and monitoring mechanisms, ensuring that all employees understand and apply the company's values in their daily activities. The progress of this commitment will be monitored annually to ensure that NOS maintains the highest standards of corporate ethics.

- Through this initiative, NOS reaffirms its commitment to transparency, integrity, and responsibility, strengthening a corporate culture based on ethics and the trust of its internal and external stakeholders.

1.3.5 ANNEXES

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1.3.5.1 Glossary

%: Percentage
AA: Advanced Analytics
ACEPI: Digital Economy Association
ACV: Life Cycle Analysis (LCA)
AdC: Portuguese Competition Authority
ADSL PT: Asymmetric Digital Subscriber Line, Portugal Telecom
AEM: Securities Issuers Association
ANACOM: Portuguese Communications Authority
ANEPC: Portuguese Civil Protection and Emergency Authority ANFR: L'Agence Nationale des Fréquences
ANI: National Innovation Agency
APAMCM: Portuguese Association for the Support of Women with Breast Cancer
APAN: Portuguese Advertisers Association
APCC: Portuguese Association of Contact Centres
APDC: Portuguese Association for the Development of Communications
APELA: Portuguese Amyotrophic Lateral Sclerosis Association
App: Application
APRITEL: Portuguese Association of Electronic Communications Operators
ARPU: Average revenue per unit
ASF: Insurance and Pension Funds Supervisory Authority
AV: Audiovisuals
AVAC: Heating, Ventilation and Air Conditioning
AWS: Amazon Web Services
AZ: Availability Zone
B2B: Business to Business
B2C: Business to Consumer
BCM: Business Continuity Management
BCSD: Business Council for Sustainable Development
BEREC: Body of European Regulators of Electronic Communications
BIA: Business Impact Analysis
BRM: Business Risk Model
BSPA: Basic Security and Privacy Assessment
CA: Board of Directors (BoD)
CAPEX: Capital expenditures
CAS: Security Assessment Committee
CCO: Chief Compliance Officer
CDP: Disclosure, Insight Action
CE: Executive Committee (EC)
CECE: European Electronic Communications Code (EECC)
CEM: Electromagnetic Fields (EMF)
CEN: European Committee for Standardisation
CENELEC: European Committee for Electrotechnical Standardisation
CEO: Chief Executive Officer
CFO: Chief Financial Officer
CH4: Methane
CISO: Chief Information Security Officer
CLC: Statutory Auditors
CMVM: Portuguese Securities Market Commission
CNCS: National Cyber-security Centre
CNPD: National Data Protection Commission
CO2: Carbon Dioxide
CO2e: Carbon dioxide equivalent
COP27: 27th United Nations Climate Change Conference
CRM: Client Relationship Management
CSA: Corporate Sustainability Assessment (S&P)
CSC: Portuguese Companies Code
CSRD: Corporate Sustainability Reporting Directive
CTE: Electrotechnical Technical Commission
CTO: Chief Technology Officer
CVM: Portuguese Securities Commission
DAE: Automated External Defibrillator
DC: Datacentre
DECO: Portuguese Association for Consumer Protection
DESI: Digital Economy and Society Index
DFC: Controlled Financial Statements
DGEEC: Directorate-General for Education and Science Statistics
DL: Decree-Law
DNA: DeoxyriboNucleic Acid
DNS: Domain Name System
DOCSIS: Data Over Cable Service Interface Specifications
DOP: Developing our People
DPO: Data Protection Officer
EBITDA: Earnings before interest, taxes, depreciation, and
amortization
EBITDA-AL: EBITDA After Leasings
EBT: Eletronic Benefits Transfer
EDP: Energias de Portugal
EEA: European Environment Agency
EEIO: Environmentally Extended Input-Output
EGDC: European Green Digital Coalition
ELA: Amyotrophic Lateral Sclerosis
ENSICO: Association for Computing Education
EoY: End-of-Year
EPCs: Collective Protective Equipment
EPIs: Personal Protective Equipment (PPE)
ERC: Portuguese Regulatory Authority for the Media

ERM: Enterprise Risk Management
ESG: Environmental, Social and Governance
eSIM: Embedded SIM
ESRS: European Sustainability Reporting Standards
ETIS: The Community for Telecom Professionals
EUA: United States of America (USA)
FAAST: Forward the Advanced Analytics Smart Transformation
FCF: Free Cash Flow
FMI: International Monetary Fund (IMF)
FttH: Fiber-to-the-Home
FTTP: Fiber to the Premises
Gbps: Gigabits per second
GHG: Greenhouse Gases
GEI: Gender-Equality Index (Bloomberg)
GeoSAT: Global Earth Observation Satellites
GeSI: Global Enabling Sustainability Initiative
GHG: Greenhouse Gas
GHz: Giga Hertz
GJ: Giga Joules
GOs: Guarantees of Origin
GRC: Governance, Risk & Compliance
GRI: Global Reporting Initiative
GSMA: Groupe Speciale Mobile Association
GWh: Gigawatt-hour
HFC: Hybrid Fiber Coax
HFCs: Hydrofluorocarbons
R&D: Research & Development
I&M: Investment and Mortgages
AI: Artificial Intelligence
ICA: Film and Audiovisual Institute
ICF: Inclusive Community Forum
ICNF: Institute for Nature Conservation and Forests
ICNIRP: International Commission on Non-Ionizing Radiation
Protection
ICT: Information and Communication Technology
IDEMIA: Information, Detection, and Identity Management
IEP: European Patent Office
IFRS: International Financial Reporting Standards
IIRC: International Integrated Reporting Council
IMAX: Image Maximum
INE: National Institute for Statistics
INESC TEC: Systems and Computer Engineering, Technology
and Science Institute
INOV: Systems and Computer Engineering Innovation
Institute
IoT: Internet of Things
IMS: Integrated Management System
IPCG: Portuguese Institute of Corporate Governance
IPMA: Portuguese Institute for the Sea and Atmosphere
IPN: Pedro Nunes Institute
ISM: Information Security Management
ISO: International Organization for Standardization
ISP: Internet Service Provider
ISS: Institutional Shareholder Services
IST: Instituto Superior Técnico
IT: Information Technology
ITED: Telecommunications Infrastructures in Buildings
ITGC: Information Technology General Controls
VAT: Value-Added Tax
KAM: Key Audit Matters
km: Kilometre
km2: Square Kilometre
KPIs: Key Performance Indicators
KRIs Key Risk Indicators
kWh: Kilowatt-hour
LED: Ligh Emitting Diode
LTP: Large Transaction Processing (LTPlabs)
M€: Millions of Euros
M2M: Machine to Machine
MBA: Master of Business Administration
Mbps: Megabit per second
MHz: Mega Hertz
MIT: Massachusetts Institute of Technology
MRC: Contract Summary Model
ms: milliseconds
MS: Microsoft
MSCI: Morgan Stanley Capital International
M MUDA: Movement for Active Digital Use.
MWh: Megawatt-hour
NACE: Statistical Classification of Economic Activities in the
European Community
NATO: North Atlantic Treaty Organisation
No.: Number
NB IoT: Narrow Band Internet of Things
NF3: Nitrogen Trifluoride
NPS: Net Promoter Score
N2O: Nitrous Oxide
OECD: Organisation for Economic Co-operation and Development
SDG: United Nations Sustainable Development Goals
OFCOM: Office of Communications (United Kingdom)
ILO: International Labour Organization
WHO: World Health Organisation
OPEX: Operational Expenditure
ORAC: Duct Access Reference Offer
ORAP: Poles Access Reference Offer

OTT: Over the Top players
P&S: Products & Services
GWP: Global Warming Potential
PC: Personal Computer
COB: Chairman of the Board
PFCs: Perfluorocarbons
PIAs: Privacy Impact Assessments
GDP: Gross Domestic Product
SMEs: Small and Medium Enterprises
SMP: Significant Market Position
PNN: National Numbering Plan
P.p.: Percentage point
PPA: Power Purchase Agreement
PRR: Recovery & Resilience Plan
PSF: Power Saving Features
PSI: Information Security Policy
PUE: Power Usage Effectiveness
PWC: PricewaterhouseCoopers
PWN: Professional Women's Network
QoS: Quality of Service
QR: Quick-Response
RA: Risk Assessment
RATs: Records of processing activity
RCIC: Risks of Corruption and Related Offences
RCN: Regulatory Compliance Officer
RGI: Integrated Management Report
GDPR: General Data Protection Regulation
RGS: Corporate Governance Report
RGUs: Revenue Generating Units
ROC: Statutory Auditor
ROSE: Robot Sensing for tele-Ecography
RPA: Robotic Process Automation
S&P: Standard & Poor's; Security & Privacy
S.A: Joint Stock Company
SBE: School of Business & Economics
SBT: Science Based Target
SBTi: Science Based Targets initiative
SBV: Basic Life Support
SF6: Sulphur Hexafluoride
SGI: Integrated Management System (IMS)
SGPS: Sociedade Gestora de Participações Sociais
SIFIDE: System of Tax Incentives for Research and Business
Development
SIM: Subscriber Identity Module
SIRESP: Portugal's Integrated Emergency and Security Network System
SLAs: Service Level Agreements
SLOs: Service Level Objectives
SMS: Short Message Service
SOC: Security Operations Centre
SRM: Supplier Relationship Management
SROC: Statutory Audit Firm
OHS: Occupational Health and Safety
STEM: Science, Technology, Engineering, Mathematics
t: Tonne
TB: Terabyte
TCFD: Task Force on Climate-Related Financial Disclosures
tCO2e: tonnes of CO2 equivalent
T&D: Transport & Distribution
IT: Information Technology
ICT: Information and Communication Technologies
ton: tonne(s)
TV: Television
EU: European Union
UNGC: United Nations Global Compact
UPS: Uninterruptible Power Supply
VHCN: Very High-Capacity Networks
VLE: Maximum Emission Threshold
VOD: Video On Demand
VPN: Virtual Private Network
Vs: Versus
W: Watts
WEPs: Women's Empowerment Principles
ZERO: Association for the Sustainability of the Earth System
9M23: 3rd Quarter 2023
4G: 4th Generation
5G: 5th Generation

1.3.5.2 External Verification Statement



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INDEPENDENT AUDITORS' LIMITED ASSURANCE REPORT ON NOS GROUP'S SUSTAINABILITY STATEMENT

To the Board of Directors

Limited assurance conclusion

We have performed a limited assurance engagement on the Consolidated Sustainability Statement of **NOS, SGPS, S.A.** (the "Group") included in section "non-financial statement" of the Management Report (the "Consolidated Sustainability Statement") at 31 December 2024 and for the period from 1 January to 31 December 2024.

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the Consolidated Sustainability Statement of **NOS, SGPS, S.A.** at 31 December 2024 and for the period from 1 January to 31 December 2024 is not prepared, in all material respects, in accordance with:

- the European Sustainability Reporting Standards (ESRS), including that the process carried out by the Group to identify the information reported in the Sustainability Statement (the "Process") is in accordance with the description set out in section 1.3.1.11 – Double materiality assessment process (IRO-1); and
- the disclosures required by Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation") included in section 1.3.2.3. – Taxonomy within the Environmental section of the Consolidated Sustainability Statement.

Basis for Conclusion

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC) and the other standards and technical guidelines of *Ordem dos Revisores Oficiais de Contas*.

The procedures performed in a limited assurance engagement are different in nature and timing and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

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Matriculada na Conservatória do Registo Comercial de Lisboa sob o Nº PT 502 161 078

Our responsibilities under these standards are described in the "Our Responsibilities" section below.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Quality and Independence

Our firm applies International Standard on Quality Management (ISQM) 1, Quality Management for *Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, issued by the IAASB. This standard requires the firm to design, implement and operate a system of quality management, including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA) and of the *Ordem dos Revisores Oficiais de Contas*' code of ethics.

Other matters

The comparative information included in the Group's Consolidated Sustainability Statement at 31 December 2023 has not been subject to our limited assurance engagement. Our conclusion is not modified in respect of this matter.

Responsibilities of the Board of Directors for the Sustainability Statement

The Board of Directors is responsible for designing, implementing and maintaining a process to identify the information reported in the Consolidated Sustainability Statement in accordance with the ESRS and for disclosing this process in section 1.3.1.11 – Double materiality assessment process (IRO-1) of the Consolidated Sustainability Statement. This responsibility includes:

- understanding the context in which the Group's activities and business relationships take place and developing an understanding of its affected stakeholders;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- the selection and application of methodologies and making assumptions that are reasonable in the circumstances.

The Board of Directors is further responsible for:

- preparing the Consolidated Sustainability Statement in compliance with the ESRS;
- preparing the disclosures in section 1.3.2.3. - Taxonomy within the Environmental section of the Consolidated Sustainability Statement, in accordance with Article 8 of the Taxonomy Regulation; and

- designing, implementing, and maintaining an appropriate information and internal control system to enable the preparation of the Sustainability Statement that is free from material misstatement, whether due to fraud or error; and
- selecting and applying appropriate sustainability reporting methods and making assumptions and estimates about individual sustainability disclosures that are reasonable in the circumstances.

Inherent limitations in preparing the Sustainability Statement

In reporting forward-looking information in accordance with ESRS, management is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Group. The actual outcome is likely to be different since anticipated events frequently do not occur as expected.

In determining the disclosures in the Consolidated Sustainability Statement, management interprets undefined legal and other terms. Undefined legal and other terms may be interpreted differently, including the legal conformity of their interpretation and, accordingly, are subject to uncertainties.

Our responsibilities

Our objectives are to plan and perform the assurance engagement to obtain limited assurance about whether the Consolidated Sustainability Statement is free from material misstatement, whether due to fraud or error, and reporting our limited assurance conclusion to the Board of Directors. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the Sustainability Statement as a whole.

As part of a limited assurance engagement performed in accordance with ISAE 3000 (Revised), we exercise professional judgement and maintain professional skepticism throughout the engagement.

Our responsibilities in respect of the Consolidated Sustainability Statement, in relation to the Process, include:

- Obtaining an understanding of the Process but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process; and
- Designing and performing procedures to evaluate whether the Process is consistent with the Group's description of its Process, as disclosed in section 1.3.1.1. - Double materiality assessment process (IRO-1).

Our other responsibilities in respect of the Consolidated Sustainability Statement include:

- Obtaining an understanding of the control environment, processes and information systems relevant to the preparation of the Consolidated Sustainability Statement but not evaluating the design of particular control activities, obtaining evidence about their implementation or testing their operating effectiveness;
- Identifying disclosures where material misstatements are likely to arise, whether due to fraud or error; and
- Designing and performing procedures focused on disclosures in the Consolidated Sustainability Statement where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the work we performed as the basis for our conclusion

A limited assurance engagement involves performing procedures to obtain evidence about the Sustainability Statement.

We designed and performed our procedures to provide a basis for our conclusion. The nature, timing and extent of our procedures depended on our understanding of the Consolidated Sustainability Statement and other engagement circumstances, including the identification of disclosures where material misstatements are likely to arise, whether due to fraud or error, in the Consolidated Sustainability Statement.

In conducting our limited assurance engagement, with respect to the Process, we:

- Obtained an understanding of the Process by:
  i. Performing inquiries of relevant personnel, at both corporate and operational levels, regarding the sustainability strategy and policies for materially-relevant aspects, and the implementation of these across various business areas; and
  ii. Reviewing the Group's internal documentation of its Process; and
- Evaluated whether the evidence obtained from our procedures about the Process was consistent with the description of the Process set out in section 1.3.1.11. - Double materiality assessment process (IRO-1).

In conducting our limited assurance engagement with respect to the Sustainability Statement, we:

- Obtained an understanding of the Group's reporting processes relevant to the preparation of its Sustainability Statement through the understanding of the control environment, processes, and information system of the Group relevant to the preparation of the Consolidated Sustainability Statement, but not with the purpose of expressing a conclusion on the effectiveness of the Group's internal control;

- Evaluated whether material information identified by the Process is included in the Consolidated Sustainability Statement;
- Evaluated whether the structure and the presentation of the Consolidated Sustainability Statement is in accordance with the ESRS;
- Performed inquiries of relevant personnel and analytical procedures on selected disclosures in the Consolidated Sustainability Statement;
- Performed substantive assurance procedures based on a sample basis on selected disclosures in the Consolidated Sustainability Statement;
- Obtained evidence on the methods, assumptions and data for developing material estimates and forward-looking information and on how these methods were applied;
- Obtained an understanding of the process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Sustainability Statement.

26 February 2025

KPMG & Associados
Sociedade de Revisores Oficiais de Contas, S.A.
(nr. 189 and registered at CMVM with the nr. 20161489)
represented by
Pedro Jorge Quental e Cruz
(ROC nr. 1765 and registered at CMVM with the nr. 20161607)



02

WE GIVE STAGE TO INNOVATION

CORPORATE GOVERNANCE REPORT

2.1 Part 1 Mandatory information concerning the Company's shareholder structure, organisation and corporate governance 298

2.2 Part 2 Corporate governance assessment 368

2.3 Part 3 Annex 379

Part 1

Mandatory information concerning the Company's shareholder structure, organisation and corporate governance

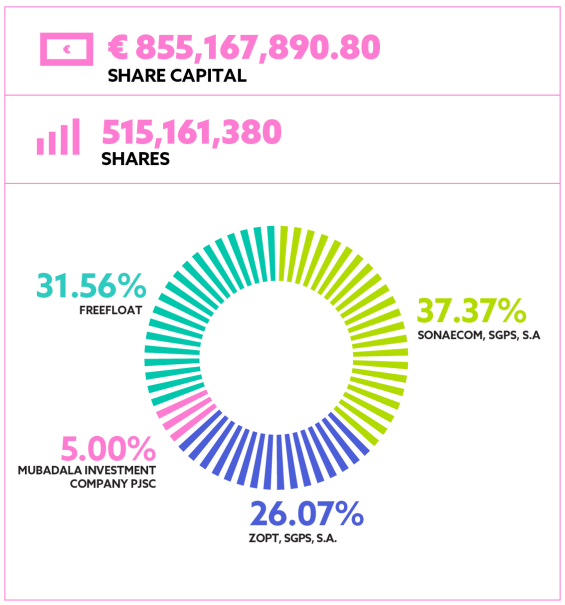
A. Shareholder Structure

I. Capital Structure

1. Capital structure

NOS has a share capital of 855,167,890.80 euros, which is fully subscribed and paid up, represented by 515,161,380 ordinary shares (there are no categories of shares), book-entry and registered, with a nominal value of 1.66 euros each and are admitted for trading on the regulated market managed by Euronext Lisbon - Sociedade Gestora de Mercados Regulamentados, S.A. ("Euronext Lisbon").

Distribution of the Company's share capital as of 31 December 2024



2. Restrictions on the transferability and ownership of shares

According to the company Articles of Association, there are no limits or restrictions on the transferability of shares representing the share capital of NOS. Notwithstanding, the Articles of Association stipulate that shareholders who are directly or indirectly involved in a business that competes with the business carried out by NOS subsidiaries cannot hold ordinary shares representing more than 10% of the Company's share capital without the prior authorisation of the General Shareholders' Meeting.

3. Own shares

The General Shareholders' Meeting of 12 April 2024 resolved to authorise the purchase and disposal of own shares by the Board of Directors, for a period of 18 months from the approval of the proposal.

The number of own shares as of the end of 2024 was as follows:

Own Shares[1]	Share Capital (%)
3,845,224	0.7464

[1] All inherent rights are suspended according to article 324(1)(a) of the Portuguese Commercial Companies Code.

4. Impact of changes in shareholder control on significant agreements

NOS is not a party to any significant agreements that come into force, are amended or terminate in the event of a change of control of the Company or a change in the members of the Board of Directors.

In accordance with normal market practices, NOS and its subsidiaries are parties to some financing contracts and debt issues that include typical change of control clauses (including, tacitly, changes of control following a public takeover bid), which are deemed necessary in order for the transactions to be finalised. The only consequence is the possibility that the financing entities or debt holders, as the case may be, will request early reimbursement, which means there is no possibility of impairing the economic interest in the Company's shares transfer, nor the shareholders' free assessment of the performance of the directors.

NOS has also not adopted any measures that imply payments or assumption of fees in the event of the transfer of control or the change in the composition of the Board of Directors, which are likely to harm the economic interest in the free transferability of shares and the shareholders' free assessment of the performance of the directors.

5. Countermeasures in case of change of control

NOS has not taken any measures to prevent the success of public takeover bids contrary to the interests of the Company and its shareholders.

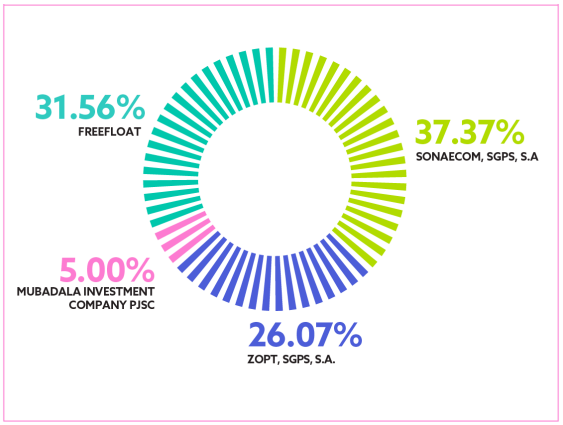
Similarly, no countermeasures were adopted that could automatically cause erosion to the Company's assets in the event of a transfer of control or of a change to the composition of the Board of Directors or that would potentially impair the economic interest in the shares' transfer and the free assessment by the shareholders of the performance of the directors.

6. Shareholder agreements

NOS is not aware of any shareholder agreements in force involving the Company.

II. Company shares and bonds held

7. Qualifying shares



The structure of NOS' qualifying shares communicated to the Company (including information provided under article 447(5) of the Portuguese Companies Code) was as follows as of 31 December 2024:

(1) Shareholding assigned to Sonaecom and, consequently, to all entities in a control relationship with Sonaecom, SGPS, S.A., namely Sontel, BV and Sonae, SGPS, S.A., directly or indirectly controlled by Efanor Investimentos, SGPS, S.A. As of 29 November 2017, Efanor Investimentos, SGPS, S.A. ceased to be a controlling shareholder under the terms and for the purposes of articles 20 and 21 of the Portuguese Securities Code.
(2) Shareholding assigned to ZOPT and, consequently, to the Kento Holding Limited and Unitel International Holdings, BV companies, as well as to Mrs. Isabel dos Santos, being (i) Kento Holding Limited and Unitel International Holdings, BV companies directly and indirectly controlled by Mrs. Isabel dos Santos and (ii) ZOPT a company controlled by its shareholders Kento Holding Limited and Unitel International Holdings, BV.
NOTE: the calculation of the percentages of voting rights does not take into account own shares held by the Company.

8. Number of shares and bonds held by members of the management and supervisory bodies

NAME	POSITION	SHARES					
		BALANCE 31/12/2023	2024 TRANSACTIONS				BALANCE 31/12/2024
			Acquisitions	Disposals	Unit Price	Date	
Board of Directors							
Ângelo Gabriel Ribeirinho dos Santos Paupério [1]	Chairman of the Board of Directors	-	-	-	-	-	-
Miguel Nuno Santos Almeida	Chairman of the Executive Committee	403,098	44,487	-	3.614 €	28/03/2024*	338,098
			-	44,487	3.614 €	28/03/2024	
			-	65,000	3.500 €	15/05/2024	
José Alexandre Koch Ferreira	Executive Member	-	-	-	-	-	-
Daniel Lopes Beato	Executive Member	16,162	4,776	-	3.614 €	28/03/2024*	20,938
Filipa de Sousa Taveira da Gama Santos Carvalho	Executive Member	49,105	5,198	-	3.614 €	28/03/2024*	54,303
Jorge Filipe Pinto Sequeira dos Santos Graça	Executive Member	188,024	22,282	-	3.614 €	28/03/2024*	100,000
			-	8,091	3.570 €	19/07/2024	
			-	26,964	3.575 €	19/07/2024	
			-	12,478	3.580 €	19/07/2024	
			-	2,467	3.585 €	19/07/2024	
			-	26,457	3.560 €	19/07/2024	
			-	5,260	3.565 €	19/07/2024	
			-	16,885	3.570 €	19/07/2024	
			-	1,398	3.575 €	19/07/2024	
			-	5,829	3.560 €	19/07/2024	
			-	4,477	3.565 €	19/07/2024	
Luís Moutinho do Nascimento	Executive Member	139,898	24,058	-	3.614 €	28/03/2024*	163,956
Manuel António Neto Portugal Ramalho Eanes	Executive Member	152,196	25,835	-	3.614 €	28/03/2024*	152,196
			-	4687	3.614 €	28/03/2024	
			-	5081	3.616 €	28/03/2024	
			-	7091	3.618 €	28/03/2024	
			-	8976	3.620 €	28/03/2024	
Ana Rita Ferreira Rodrigues	Non-Executive Member	-	-	-	-	-	-
António Bernardo Aranha da Gama Lobo Xavier	Non-Executive Member	-	-	-	-	-	-
Catarina Eufémia Amorim da Luz Tavira Van-Dúnem	Non-Executive Member	-	-	-	-	-	-
Cristina Maria de Jesus Marques	Non-Executive Member	-	-	-	-	-	-
Eduardo António Salvador Verde Rodrigues Pinho	Non-Executive Member	38	-	-	-	-	38
João Pedro Magalhães da Silva Torres Dolores [2]	Non-Executive Member	-	-	-	-	-	-
Maria Cláudia Teixeira de Azevedo [3]	Non-Executive Member	-	-	-	-	-	-
Statutory Independent Audit Board							
José Pereira Alves	Chairman of the Statutory Independent Audit Board	-	-	-	-	-	-
Paulo Cardoso Correia da Mota Pinto	Member of the Statutory Independent Audit Board	-	-	-	-	-	-
Patrícia Andrea Bastos Teixeira Lopes Couto Viana	Member of the Statutory Independent Audit Board	-	-	-	-	-	-
Ana Luísa Nabais Aniceto da Fonte	Alternate Member of the Statutory Independent Audit Board	-	-	-	-	-	-
Statutory Auditor							
KPMG & Associados, SROC, S.A.	Statutory Auditor	-	-	-	-	-	-
Pedro Jorge Quental e Cruz	Statutory Auditor	-	-	-	-	-	-
Luís Miguel Pedrosa Guerra	Alternate Statutory Auditor	-	-	-	-	-	-

[1] Ângelo Gabriel Ribeirinho dos Santos Paupério is the Chairman of the Board of Directors of Sonaecom, SGPS, S.A., a company that held 192,527,188 NOS shares as of 31/12/2024.
[2] João Pedro Magalhães da Silva Torres Dolores is an Executive Director of Sonaecom, SGPS, S.A., a company that held 192,527,188 NOS shares as of 31/12/2024.
[3] Maria Cláudia Teixeira de Azevedo is an Executive Director of Sonaecom, SGPS, S.A., a company that held 192,527,188 NOS shares as of 31/12/2024.
*Acquisition of shares at a 90% discount under the Short and Medium-Term Variable Remuneration Regulation of NOS, SGPS, S.A.

9. Special powers of the Board of Directors, especially as regards resolutions on capital increase

The Company's Board of Directors exercises the legal and statutory powers it has been assigned.

The 2024 Annual General Shareholders' Meeting authorised the Board of Directors to purchase and dispose of own shares and bonds by the Company and its subsidiaries, within a set of parameters defined and approved by the General Shareholders' Meeting, in accordance with the applicable legislation.

The Articles of Association of the Company do not provide for any special powers of the Board of Directors with regard to resolutions on capital increase.

10. Significant business relationships between the holders of qualified shares and the Company

The significant relationships of a business nature held between NOS and its holders of qualified shares during the 2024 financial year correspond to the transactions with related parties referred to in paragraph 92 of this Report.

B. Governing bodies and committees

I. General Shareholders' Meeting

a) Composition of the Board of the General Shareholders' Meeting

11. Details and position of the members of the Board of the General Shareholders' Meeting and their term of office

The Board of the Company's General Shareholders' Meeting consists of a Chairman and a Secretary, elected by the General Shareholders' Meeting.

The current members were elected for the 2022-2024 term, starting on 21 April 2022 and ending on 31 December 2024, and they are:

 António Agostinho Guedes	**Chairman of the Board of the General Shareholders' Meeting**

 Maria Daniela Passos	**Secretary of the Board of the General Shareholders' Meeting**

b) Exercise of voting rights

12. Restrictions on voting rights

There are no restrictions on voting rights laid down in the Company's Articles of Association, and shareholders with voting rights are able to attend the General Meetings.

Every 100 shares corresponds to one vote, which is not considered to be a limit on the exercise of voting rights by shareholders, as it does not follow the principle of *one share one vote*, since (i) the nominal value of the shares is 1.66 euros and (ii) shareholders holding a lower number of shares than that required to exercise voting rights may group together in order to complete the required number or a higher number and be represented at the General Shareholders' Meeting by one of the group members.

Shareholders with voting rights are entitled to participate, discuss and vote at the General Shareholders' Meeting if, on the date of registration, corresponding to 0:00 (GMT) of the 5th trading day before the date of the Meeting, they hold shares that give them the right to at least one vote under the law and the Company's Articles of Association, and if they fulfil the applicable legal formalities, under the terms described in the corresponding notice of meeting.

The shareholdings as a whole are not subject to limits on their respective voting power, as there are no cap limits on voting. Furthermore, considering the relationship of proportionality, there is no time lag between the right to receive dividends or to subscribe new securities and the right to vote.

The right to vote on all matters described in the notice of meeting may also be exercised by correspondence or electronically, under the terms regulated by the Company's Articles of Association and in the notice of meeting, as the Company has a system that allows shareholders, without limitation, to exercise their right to vote in both formats, and this information is duly communicated to shareholders and made available to the general public through the publication of the respective notice of meeting and other documents (including ballot papers and forms) on the Company's website.

Shareholders' participation is ensured by electronic means, through videoconferencing and with the possibility of exercising their voting rights.

13. Maximum percentage of voting rights that may be exercised by a single shareholder or by shareholders that are in any relationship, as set out in article 20(1) of the Portuguese Securities Code

Under the terms of the Company's Articles of Association, there is no limit on the number of votes that can be held or exercised by each shareholder.

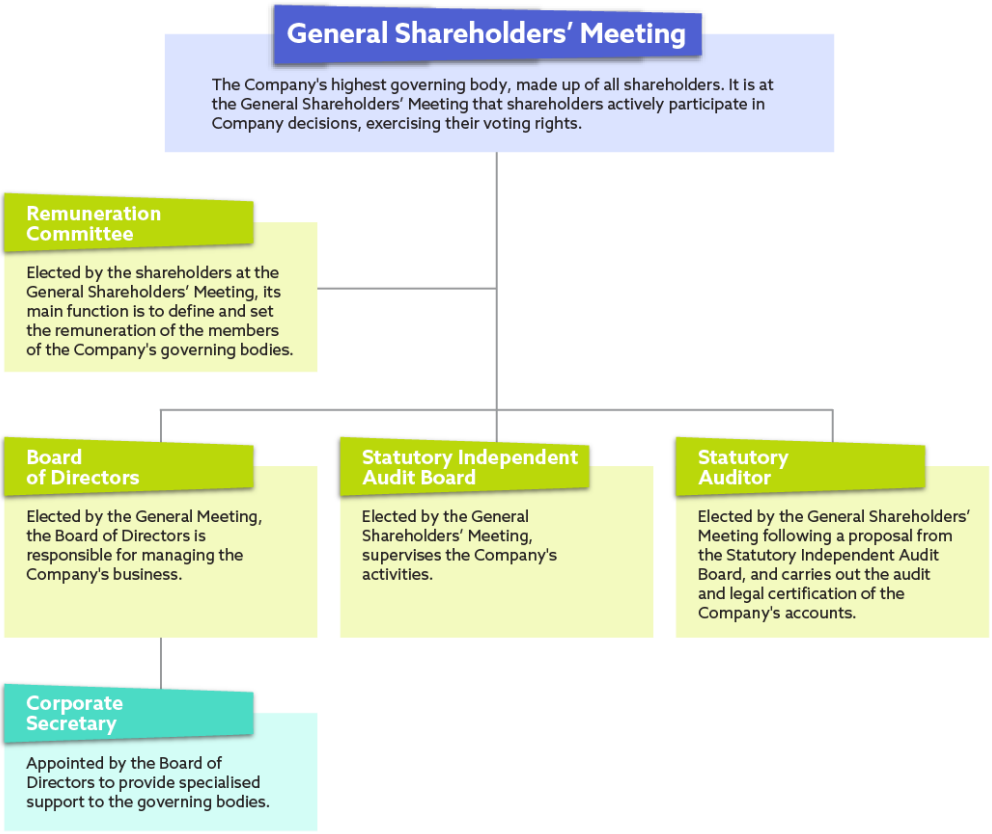
14. Shareholder decisions that, under statutory requirement, can only be taken with a qualified majority, in addition to those legally provided for

Under the terms of the Company's Articles of Association, the General Shareholders' Meeting may meet for the first time provided that shareholders holding shares representing more than 50% of the share capital are present or represented, which represents the constitutive quorum.

The Articles of Association do not set any qualified quorum higher than that provided for by law.

II. Administration and Supervision

a) Composition



15. Identification of the corporate governance model

NOS adopts the reinforced Latin governance model, which is fully and effectively implemented, and there are no constraints on its operation.

The model adopted makes it possible for the Company to function properly, guaranteeing a flow of information and a transparent and appropriate dialogue between the various governing bodies and between the Company, its shareholders and other stakeholders.

16. Statutory rules on the appointment and replacement of directors

The members of the Board of Directors are elected by the General Shareholders' Meeting, which shall appoint its Chairman and, if it so decides, one or more Vice-Chairman.

If the Chairman of the Board of Directors is not appointed by the General Shareholders' Meeting, the Board of Directors shall make this appointment.

One of the Company's directors may be elected by the General Shareholders' Meeting by means of a separate election, from among the persons proposed in lists subscribed by groups of shareholders, provided that none of these groups holds shares representing more than 20% and less than 10% of the share capital.

The replacement of a director, as a result of the termination of their duties before the end of the term of office, shall take place in accordance with the applicable legal terms.

Subject to the foregoing, the Company's Articles of Association establish that, when the director who is definitively absent is the Chairman or Vice-Chairman, they shall be replaced by a vote at the General Shareholders' Meeting. For this purpose, a director shall be deemed to be definitively absent if, during their term of office, they miss two meetings in a row or five in total, without a justification accepted by the Board of Directors.

17. Composition of the Board of Directors

The Board of Directors consists of a maximum of 23 members elected by the General Shareholders' Meeting. There is no express provision for a minimum number, so the statutory minimum will correspond to the minimum legally required for a collegiate body (i.e. 2 members).

If the law or the Articles of Association do not establish a specific number of members of a corporate body, this number shall be established, on case-by-case basis, by the resolution of election, corresponding to the number of members elected. This is subject to the possibility of changing the number of members of the corporate body during the course of the term of office, up to the limit established by law or the Articles of Association.

The Board of Directors performs its duties for periods of 3 renewable calendar years, with the calendar year of appointment counting as a full year.

The Board of Directors was elected at the Annual General Shareholders' Meeting on 21 April 2022, for the three-year term 2022-2024, ending on 31 December 2024.

As of 31 December 2024, the Board of Directors consisted of the following directors:



Ângelo Paupério

Chairman of the Board of Directors | Non-Executive Director

First Appointment:
1 October 2013
(Chairman since 27 Jan 2020)

No. of Terms: 4



Miguel Almeida

Chief Executive Officer, CEO
Chairman of the Executive Committee

First Appointment:
1 October 2013

No. of Terms: 4



José Koch Ferreira

Chief Financial Officer, CFO
Executive Director

First Appointment:
01/01/2024

No. of Terms: 1



Luís Nascimento

Executive Director

First Appointment:
29 June 2017

No. of Terms: 3



Jorge Graça

Chief Technology Officer, CTO
Executive Director

First Appointment:
26 April 2016

No. of Terms: 3



Manuel Ramalho Eanes

Executive Director

First Appointment:
1 October 2013

No. of Terms: 4



Filipa Carvalho

Chief Compliance Officer, CCO
Executive Director

First Appointment:
15 January 2021

No. of Terms: 2



Daniel Beato

Executive Director

First Appointment:
15 January 2021

No. of Terms: 2



Cláudia Azevedo

Non-Executive Director

First Appointment:
1 October 2013

No. of Terms: 4



João Dolores

Non-Executive Director

First Appointment:
26 April 2016

No. of Terms: 3



Cristina Marques

Non-Executive Director

First Appointment:
23 March 2020

No. of Terms: 2



Eduardo Verde Pinho

Non-Executive Director

First Appointment:
21 April 2022

No. of Terms: 1



Ana Rita Rodrigues

Non-Executive Director

First Appointment:
23 March 2020

No. of Terms: 2



António Lobo Xavier

Non-Executive Director

First Appointment:
1 October 2013

No. of Terms: 4



Catarina Van-Dunem

Non-Executive Director

First Appointment:
27 November 2012

No. of Terms: 5

18. Distinction between executive and non-executive directors and details of independent members

The Regulations of the Board of Directors, approved on 3 May, 2022, establish that the members of the Board of Directors who do not perform executive duties should always outnumber the members of the Executive Committee, in order to ensure the effective capacity for adequate supervision, monitoring and evaluation of the performance of the members of the Executive Committee.

Therefore, in order to maximise the pursuit of the Company's interest, the Board of Directors consists of 8 non-executive members and 7 executive members.

The number of non-executive members is adequate, taking into account, in particular, the size, shareholder structure and complexity of the risks that are involved in the Company's activity.

In view of the above, and also considering the size of the Company and its shareholder structure, there is currently no independent director among the non-executive directors (taking into account the concept of independence stipulated in the applicable CMVM Regulations and the IPCG Corporate Governance Code).

The non-executive directors of the Company have regularly and effectively developed their legal functions which generally consist in the supervision, oversight and evaluation of the executive members' activity. The Regulations of the Board of Directors establish that those directors should, notably, participate in the Board of Directors' definition of strategies (including the strategic plan), main policies (including the risk policy), business structure and decisions deemed strategic to the Company due to their associated amount or risk, together with assessing their compliance, not being subject, however, to delegation to the Executive Committee.

At its meeting of 30 October 2024, the Board of Directors approved the appointment of António Bernardo Aranha da Gama Lobo Xavier as coordinator of the Company's non-executive directors with the role of (i) acting, whenever necessary, as the spokesperson with the Chairman of the Board of Directors and the other directors, (ii) ensuring that the non-executive directors have all the conditions and resources necessary to carry out their duties, and (iii) coordinating them in the assessment of their performance by the management body.

The non-executive directors of NOS have also made an important contribution to the Company by performing their duties on the specialised committees of the Board of Directors (see paragraph 27).

19. Professional qualifications and curriculum information of the members of the Board of Directors

Under the terms of the Portuguese Companies Code ("CSC"), the General Shareholders' Meeting is responsible for electing the members of the management and supervisory bodies and, to this extent, it will play an important role in choosing qualified professionals, while also ensuring the promotion of diversity within these bodies. The professional qualifications and positions held by each member of the Board of Directors are presented in the Annex to this Report and, briefly, in the competency matrix of the Board of Directors presented herein.



The Regulations of the NOS Appointments and Assessment Committee stipulate that, in carrying out its duties in support of the Board of Directors, the Committee draws up an opinion on the suitability of a given candidate for the body, based on criteria such as qualifications, knowledge, professional competence and experience, independence, integrity, availability and diversity, with specific focus on gender diversity. The purpose is therefore to promote an improvement in the performance of the management body and a balance in its composition.

In turn, it is the duty of the Corporate Governance and Sustainability Committee to previously determine the abstract criteria and requirements of the profile for new corporate board members suited to the position to be held which, in addition to individual attributes (such as expertise, independence, integrity, availability and experience), should also consider diversity requirements, with a particular emphasis on gender diversity, which may help to enhance the board's performance and balance its respective composition.

To this end, NOS' Internal Policy for Selecting Members of the Management and Supervisory Bodies provides for a set of general principles and criteria of individual merit and collective composition, which include, among other items, diversity and inclusion within these corporate bodies. This internal policy is also aligned with the principles contained in the NOS Group's Declaration of Commitment to Diversity and Inclusion.

The Internal Policy for Selecting Members of the Management and Supervisory Bodies is available at:

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/politica-interna-de-selecao-ca-e-cf-nos-marco2022-en.pdf

The NOS Group's Declaration of Commitment to Diversity and Inclusion is available at:

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/declaration-commitment-diversity-and-Inclusion.pdf

In this regard, it should also be added that the NOS enshrines in its Code of Ethics a general principle applicable to all its employees, and therefore including the members of the management and supervisory bodies, under which the human resources management policy is based primarily on respect for the diversity and rights of each person and on non-discrimination based on age, gender, sexual orientation, race, disability, religion or creed, promoting diversity as a fundamental value present in all internal processes and procedures.

Currently, in addition to the diversity of skills, variety of academic qualifications and professional experience, the members of the Board of Directors and the Statutory Independent Audit Board have adequate diversity in terms of age and gender. In fact, as well as the percentage of female members being 33% and 50% respectively in both bodies - in compliance with the law - the members of these bodies are between 36 and 65 years of age.

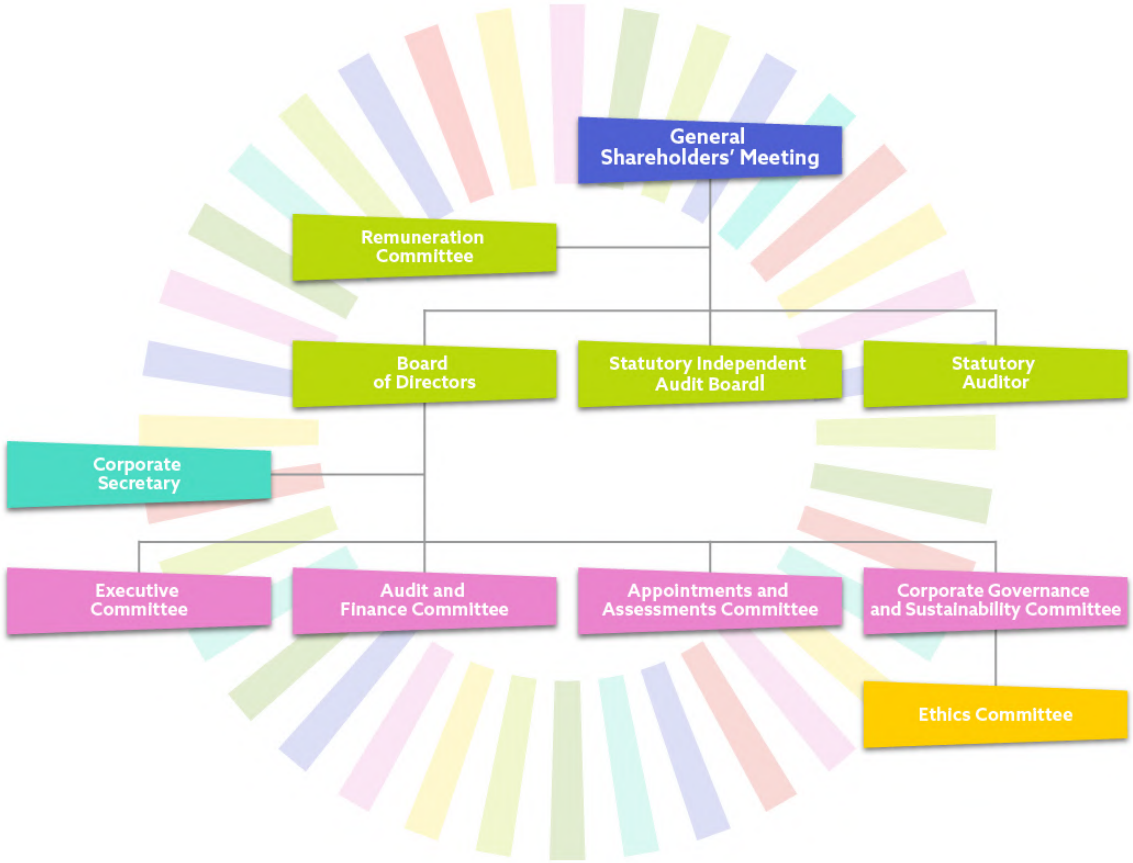
The Internal Policy for the Selection of Members of the Management and Supervisory Bodies, prepared by the Corporate Governance and Sustainability Committee, establishes a set of principles, requirements and criteria relating to the profile of the members of the management and supervisory bodies, to be considered individually and collectively. In light of this internal policy, the aim is to promote the composition of bodies with members who can demonstrate that they have, namely, the experience, expertise, integrity, independence and availability to carry out their duties, integrating bodies characterised by their diversity and inclusion, complementarity and independence.

20. Family, professional or business relationships of members of the Board of Directors with shareholders to whom a qualified holding greater than 2% of the voting rights is assigned

Name	Position	Company	Participation in NOS share capital
Ângelo Gabriel Ribeirinho dos Santos Paupério (Chairman of the Board of Directors of NOS)	Chairman of the of Directors	Sonaecom, SGPS, S.A.	37.37%
Maria Cláudia Teixeira de Azevedo (Member of the Board of Directors of NOS)	Member of the Board of Directors	SONAECOM, SGPS, S.A.	37.37%
João Pedro Magalhães da Silva Torres Dolores (Member of the Board of Directors of NOS)	Member of the Board of Directors	SONAECOM, SGPS, S.A.	37.37%

21. Competence sharing between the various corporate bodies, committees and/or departments within the Company, including information on competence delegation, particularly with regard to daily management of the Company

The Company's bodies are the Board of the General Shareholders' Meeting, the Remuneration Committee, the Board of Directors, the Statutory Independent Audit Board and the Statutory Auditor.



The Board of Directors of NOS is the corporate body responsible for managing the Company's activity, and its competences are defined by law, the Company's Articles of Association and the respective Regulations.

The Board of Directors created and delegated the day-to-day management of the Company to an Executive Committee for the three-year term 2022-2024, establishing its composition, functioning and delegation of management powers.

The Board of Directors delegated the powers needed for the day-to-day running of the Company to the Executive Committee. For these purposes, the following are not deemed as current management and, as such, were not delegated by the Board of Directors, namely: (i) the definition of the Company's strategy and main policies; (ii) the organisation and coordination of the business structure; (iii) the matters which are to be deemed as strategic in view of their amount, risk or special characteristics.

In addition to the day-to-day management of the Company, the Executive Committee shall be specifically responsible for:

a) Proposing, to the Board of Directors, the strategic guidelines of the Group and fundamental policies of the Company and its subsidiaries;

b) Working with the Board of Directors and its Committees, as needed for the fulfilment of their respective purposes;

c) Determining the internal organizational and operating norms of the Company and its subsidiaries, namely with regard to employee hiring, professional categories, remuneration and other bonuses;

d) Issuing binding instructions to companies in a group relationship comprising complete control, and controlling these companies' implementation of the guidelines and policies laid out pursuant to the above sub-paragraphs;

e) Exercising disciplinary power, and deciding on applicable penalties for the Company's employees;

f) Deciding on the acquisition of own shares by the Company, and/or by any of its dependent companies, within the scope of NOS' variable remuneration policy, per the terms and conditions approved by the General Shareholders' Meeting.

When defining the functions of the Executive Committee, the Board of Directors delegated the following powers specifically to the Chairman of the Executive Committee:

a) Coordinating the activities of the Executive Committee;

b) Convening and conducting the meetings of the Executive Committee;

c) Ensuring the proper execution of the Board of Directors' resolutions;

d) Ensuring the proper implementation of the Executive Committee's resolutions;

e) Ensuring compliance with limits for the delegation of powers, the Company's strategy and obligations of cooperation with the Chairman of the Board of Directors and other members of the Board of Directors and the remaining corporate bodies;

f) Ensuring that the Board of Directors is informed of all relevant actions and decisions of the Executive Committee, and ensuring that all clarifications requested by the Board of Directors are provided in a timely and adequate manner;

g) Ensuring that the Board of Directors is informed, on a quarterly basis, of transactions that, within the powers delegated to the Executive Committee, have been entered into between the Company and shareholders of qualified holdings equal or above 2% of the voting rights (Qualified Shareholders) and/or any entities in a relationship of article 20 of the Portuguese Securities Code with them (Related Entities), when such transactions exceed the individual amount of 10,000 euros.

In defining the Company's strategy and policies, the Board of Directors seeks to ensure the fulfilment of the company's long-term goals and to contribute to the good of the community in general.

With regard to the compliance of its environmental, social and governance goals, NOS has adopted a set of codes and policies aimed at promoting good practices in these matters, as well as creating the necessary management systems and tools with competences in defining and implementing strategies to promote sustainability and create long-term social value, as presented in chapter "1.3.1 ESRS 2 - General Disclosures" of the Integrated Annual Report, to which reference is made.

On 31 December 2024, the Executive Committee consisted of the following 7 members, functionally organised as follows:



Miguel Almeida

Areas of Responsibility:
Strategy and Business Development; Corporate Communication; Transformation; NOS Madeira and NOS Açores



José Koch Ferreira

Areas of Responsibility:
Financial and Assurance Services; Corporate Finance; Data Protection Officer; Investor Relations & Sustainability; Planning and Management Control; Procurement & Supply Chain



Manuel Ramalho Eanes

Areas of Responsibility:
Centre for Business Transformation; Business Solutions; Direct B2B Sales; Business Channels; Wholesale



Luís Nascimento

Areas of Responsibility:
People and Organisation; Customer Service, Back-office and Processes; R&M, Technical Support, Logistics and Terminal Management; Cinemas; Audiovisuals; Content; Advertising



Jorge Graça

Areas of Responsibility:
Quality & Transversal Projects; Mobile & Fiber Centric; Operations; Information & Innovation Services



Filipa Carvalho

Areas of Responsibility:
Audit, Risk and Compliance; Market & Customer Intelligence (AI); Legal and Regulation



Daniel Beato

Areas of Responsibility:
Brand & Communication; B2C Segment Management; WOO and WTF;
B2C Product; B2C Sales; CRM and Customer Experience; Alarms

b) Functioning

22. Availability and place where Regulations on the functioning of the Board of Directors can be consulted

At its meeting of 3 May 2022, the Board of Directors approved its organisational and functioning Regulations, which can be consulted at

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/regulamento-ca-maio2022-en.pdf

In line with the recommendations and best practices adopted by the Company, the Regulations on the organisation and functioning of the Board of Directors govern, in particular, the exercise of powers, the position of Chairman, the frequency of meetings, the performance and the obligations' framework of the members of this body.

23. Number of meetings held and attendance rate of the members of the Board of Directors

In accordance with its Regulations, the NOS Board of Directors meets at least 6 times a year and whenever it is convened on the initiative of the Chairman or 2 directors.

During the 2024 financial year, the Board of Directors held 6 meetings, 5 were hybrid (in person and by electronic means) and 1 exclusively by electronic means, all of which had the minutes drawn up.

The attendance rate of the members of the Board of Directors at meetings was as follows:

Name	Present	Represented	Absent	Level of attendance (%)
Ângelo Gabriel Ribeirinho dos Santos Paupério (Chairman of the Board of Directors)	6	0	0	100
Miguel Nuno Santos Almeida	6	0	0	100
José Alexandre Koch Ferreira	6	0	0	100
Daniel Lopes Beato	6	0	0	100
Filipa de Sousa Taveira da Gama Santos Carvalho	6	0	0	100
Jorge Filipe Pinto Sequeira dos Santos Graça	6	0	0	100
Luís Moutinho do Nascimento	6	0	0	100
Manuel António Neto Portugal Ramalho Eanes	6	0	0	100
Ana Rita Ferreira Rodrigues	6	0	0	100
António Bernardo Aranha da Gama Lobo Xavier	4	2	0	100
Catarina Eufémia Amorim da Luz Tavira Van-Dúnem	4	0	2	66.67
Cristina Maria de Jesus Marques	5	1	0	100
Eduardo António Salvador Verde Rodrigues Pinho	6	0	0	100
João Pedro Magalhães da Silva Torres Dolores	6	0	0	100
Maria Cláudia Teixeira de Azevedo	5	1	0	100

24. Competent governing bodies undertaking the performance appraisal of executive directors

The annual assessment of the Executive Committee is the responsibility of the Remuneration Committee, supported by an opinion issued by the Appointments and Assessments Committee.

The NOS Board of Directors also makes it a rule to self-evaluate its procedures and that of its internal committees, guaranteeing efficient, informed and consisted performance in line with the organisation's goals.

25. Predetermined criteria for assessing the performance of executive directors

The assessment criteria of the members of the Executive Committee are totally dependent on measurable and pre-defined criteria, which globally consider the fulfilment of the strategy and goals set, plans and budget, the growth of the Company and the wealth created, from a medium and long-term perspective.

For further details, please refer to the information presented in paragraphs 70 and 71 of this Report.

26. Availability of the members of the Board of Directors, with details of the positions held simultaneously in other companies, within and outside the Group

The offices held by directors in other companies, both within and outside the NOS Group, are presented in the Annex to this Report.

All the members of the Board of Directors are in a position to perform their duties with the utmost diligence, ensuring careful management in accordance with best practice and scrupulous fulfilment of their general and fundamental duties.

In accordance with the Regulations of the Board of Directors, the directors must inform the Chairman of the Board of Directors, who informs the other members, whenever there is a situation of potential or actual conflict of interest on the part of a director, on their own behalf, on behalf of a third party, or as defined in the Company's Code of Ethics. Such communication of conflicts of interest should not be confined to the context of deliberations, but should occur whenever there are facts that could constitute or give rise to a conflict between the interests in question and those of the Company.

In situations relating to company resolutions, as defined in its Regulations, if the Board of Directors or the actual director concludes that there is a conflict of interest, the latter will not take part in the discussion or exercise their right to vote on the resolutions in question, and in these situations, they will not receive the documentation relating to the issues in which there is a conflict of interest.

In addition, at the time of their election and by 31 January of each year, all members of the Board of Directors must individually complete a questionnaire on independence and applicable incompatibilities in accordance with the applicable regulation, subject to the obligation to immediately report any changes to the answers provided in said questionnaire.

c) Committees within the Board of Directors

27. Details of the committees created within the Board of Directors

In consideration of the limits established by law and best corporate governance practices, the NOS Board of Directors created and delegated the day-to-day management of the Company to an Executive Committee.

In compliance with the applicable legal or regulatory requirements, the Board of Directors of NOS has created internal committees with merely auxiliary functions and with decisions being made solely by the management body.

All the Committees have internal regulations governing the exercise of their powers, the position of Chairman, frequency of meetings, operation and the duties of their members, notably:



28. Composition of the Executive Committee

On 31 December 2024, the NOS Executive Committee consisted of the following directors

 Miguel Almeida	**Chairman of the Executive Committee**
 José Koch Ferreira	**Member of the Executive Committee**
 Manuel Ramalho Eanes	**Member of the Executive Committee**
 Luís Nascimento	**Member of the Executive Committee**
 Jorge Graça	**Member of the Executive Committee**
 Filipa Carvalho	**Member of the Executive Committee**
 Daniel Beato	**Member of the Executive Committee**

The members of the Executive Committee are chosen by the Board of Directors, which consists of a minimum of 3 and a maximum of 7 directors.

29. Description of the powers of each of the committees established and a summary of activities undertaken exercising said powers

The Board of Directors has delegated to the Executive Committee the necessary powers to develop and execute the day-to-day management of the Company, as described in paragraph 21 of this Report.

The powers delegated to the Executive Committee may be sub-delegated, partially or in whole, to one or more of its members or to employees of the Company.

The Executive Committee is therefore responsible for the day-to-day management of the Company and consists of directors whose professional profiles ensure recognized suitability, reputation, competence and diversity of knowledge and experience to carry out their duties.

The Board of Directors has defined the rules for the composition, operation and delegation of management powers to the Executive Committee, and this document is available for consultation at:

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/deleg-ce-2022-en.pdf

Members of the Executive Committee may not perform executive management duties at companies in which the Company has no shares, without the prior consent of the Board of Directors.

In accordance with its Regulations, the Executive Committee held 40 meetings during the 2024 financial year, at which it discussed, among other things, issues related to the activities to be carried out by the Group's business units and companies, approval of transactions with related parties and approval of the Group's corporate reorganisation operations. Minutes were taken of all meetings and attendance was 95.36%.

For more detailed information on the professional experience and competences for office of the members of the Executive Committee, please refer to the Annex to this Report.

CORPORATE GOVERNANCE AND SUSTAINABILITY COMMITTEE

The Corporate Governance and Sustainability Committee is responsible for reflecting on the system, structure and practices of corporate governance, environmental and social sustainability, particularly in the area of human and labour rights protection, verifying their effectiveness and proposing to the competent bodies the measures to be implemented with a view to improving them.

On 31 December 2024, the Corporate Governance and Sustainability Committee had the following composition:

 Cláudia Azevedo	**Chairman of the Corporate Governance and Sustainability Committee**
 António Lobo Xavier	**Member of the Corporate Governance and Sustainability Committee**
 Filipa Carvalho	**Member of the Corporate Governance and Sustainability Committee**

Its Regulations can be consulted at:

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/regulamento-cgs-s-maio2022-en.pdf

The powers and competences of the Corporate Governance and Sustainability Committee include the following:

a. To study, propose and recommend the adoption by the Board of Directors of the policies, rules and procedures necessary for compliance with the applicable legal and regulatory provisions as well as those of the Articles of Association, including recommendations, opinions and best practices, both national and international, in the matter of corporate governance, rules of conduct and social responsibility;

b. To supervise environmental, social and corporate governance risks and create mitigation and resolution mechanisms for any controversial situations associated with them;

c. To strive for full compliance with legal and regulatory requirements, recommendations and best practices relating to the Company's governance model and for the adoption by the Company of corporate principles and practices in matters such as:

    i. The structure, powers and operation of corporate boards and internal committees, and their respective internal coordination;

    ii. Requirements with regard to incompatibilities, independence, qualifications, experience and other diversity requirements applicable to members of the managing and supervisory boards;

    iii. Efficient means for non-executive members of the managing board to perform their duties;

    iv. The exercising of voting rights, representation and equal treatment of shareholders;

    v. Preventing conflicts of interest;

    vi. The scheme applicable to executive directors, and their performance of executive duties at entities outside the Group;

    vii. Transparency of corporate governance, of information to be disclosed to the market and of the relationships with the investors and other Company stakeholders;

d. To promote and supervise, at the various hierarchical levels, effective compliance with the Company's Code of Ethics, and to propose to the Board of Directors any measures it deems appropriate to improve and update the aforementioned Code;

e. Proposing measures to the Board of Directors as appropriate towards developing a corporate culture and professional ethics within the Company;

f. Assisting and supporting the Board of Directors in the performance of its function of supervising business activities in matters of corporate governance, rules of conduct and environmental and social responsibility, as well as in the way it ensures the adequate and timely flow of information necessary for the exercise of the legal and statutory powers of all the Company's bodies and committees, in particular its minutes and notices of meeting.

g. In cooperation with the Appointments and Assessments Committee, establishing criteria and requirements for the profile of new corporate board members suited to the function to be performed, including – in addition to individual attributes such as competence, independence, integrity, availability and experience – diversity requirements that contribute jointly towards the outstanding performance of these bodies and their balanced composition;

h. Ensuring full compliance with legal and regulatory requirements, recommendations and good practices in the area of sustainability, proposing the guidelines for the Company's social, environmental and ethical responsibility policies, including, among others, principles and values to safeguard the interests of the Company's various stakeholders, as well as supervising and monitoring the implementation of the strategic plan for environmental, social and corporate governance sustainability and its alignment with the corporate strategy;

i. In conjunction with the Company's Sustainability Forum, monitor the main developments in environmental and social sustainability.

In 2024, as part of its remit, the Corporate Governance and Sustainability Committee met twice, having been discussed, among other things, issues related to the integrated management and corporate governance report for the 2023 financial year, as well as the activity carried out by the Ethics Committee that year, and approved the NOS Group's Human Rights Policy. Meeting minutes were drawn up and attendance was 100%.

AUDIT AND FINANCE COMMITTEE

The Audit and Finance Committee is responsible for assisting in the assessment of financial matters, accounting practices and policies, supervising the risk control policy and advising the Board of Directors and the Statutory Independent Audit Board on the aforementioned matters.

On 31 December 2024, the Audit and Finance Committee had the following composition:



João Dolores — **Chairman of the Audit and Finance Committee**



Ângelo Paupério — **Member of the Audit and Finance Committee**



Ana Rita Rodrigues — **Member of the Audit and Finance Committee**



Cristina Marques — **Member of the Audit and Finance Committee**

The Company believes that the composition of the Audit and Finance Committee, as is market practice in comparable companies, ensures the efficient execution of the duties entrusted to it and that this number is adequate, taking into account the size of the Company and the complexity of the risks involved in its activity.

Its Regulations can be consulted at:

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/regulamento-caf-maio2022-en.pdf

The Audit and Finance Committee has the following specific powers and competences:

a. Monitoring the activities of the Executive Committee;

b. Reviewing the annual, biannual, quarterly and similar financial statements, and disclose and report its findings to the Board of Directors;

c. Advising the Board of Directors on its reports for the market to be included in the documents disclosing the annual, biannual and quarterly results;

d. Advising the Statutory Independent Audit Board, on behalf of the Board of Directors, on the appointment, powers and remuneration of the External Auditor;

e. Advising the Board of Directors on the quality and independence of the Internal Auditing function and the appointment and dismissal of the Internal Audit Director;

f. Reviewing the scope of the Internal Auditing and Risk Management functions, together with its relationship with the work of the External Auditor;

g. Reviewing and discussing with the External Auditor, Internal Auditor and head of risk management with regard to reports being produced within the scope of its duties and, consequently, advising the Board of Directors on what they deem is relevant;

h. Overseeing the Company's risk management policy, in conjunction with the Statutory Independent Audit Board, by monitoring risk control policies, the identification of key risk indicators (KRI) and integrated risk assessment methodologies;

i. Reviewing, discussing and advising the Board of Directors on the Company's accounting policies, criteria and practices;

j. Reviewing transactions between the Company and shareholders of qualified holdings of 2% or more of voting rights ("Qualified Shareholders") and/or entities which they have any relationship pursuant to article 20 of the Securities Code, and persons or entities qualified as related parties ("Related Parties"), pursuant to Company regulations approved by the Board of Directors by proposal of the Statutory Independent Audit Board.

In 2024, within the scope of its powers, the Audit and Finance Committee met 5 times, discussing (i) issues related to financing strategy, (ii) transactions with related parties, (iii) planning and control, financing, investor relations and sustainability and internal audit reports, (iv) quarterly and annual financial statements, (iv) press releases announcing results and (v) the Group's corporate reorganisation operations. Meeting minutes were drawn up and attendance at meetings was 100%.

APPOINTMENTS AND ASSESSMENTS COMMITTEE

The duties of the Appointments and Assessments Committee are to ensure a competent and independent assessment of the performance of executive directors, the overall assessment of the performance of the Board of Directors and the various specialised committees, and also to ensure the timely identification of potential candidates with the necessary profile to perform the duties of director.

On 31 December 2024, the composition of the Appointments and Assessments Committee was as follows:



Ângelo Paupério — **Chairman of the Appointments and Assessments Committee**



Ana Rita Rodrigues — **Member of the Appointments and Assessments Committee**



João Dolores — **Member of the Appointments and Assessments Committee**

Its Regulations can be consulted at:

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/regulamento-da-cna-maio2022-en.pdf

The Appointments and Assessments Committee is responsible for, notably:

a. Assisting the Board of Directors in choosing the directors to be appointed by co-option to the Company's Board of Directors;

b. In its functions of supporting the Board of Directors, it is the Committee's responsibility, should any vacancy occur in the Company's Board of Directors or Executive Committee, to prepare a grounded opinion, identifying the individuals with the profile best suited to the function to be performed, considering – along with individual attributes such as competence, independence, integrity, availability and experience – diversity requirements which, taken together, contribute towards the outstanding performance of these boards and balance in their respective composition;

c. Approve and make its terms of reference available, and foster, to the extent of its powers, transparent selection processes that include effective mechanisms to identify potential candidates, and ensure that those chosen as candidates possess the highest degree of merit, are best suited to the demands of the functions to be carried out, and shall encourage suitable diversity, including gender diversity, within the organisation;

d. Conduct the annual evaluation process of the members of the Executive Committee, ensuring further harmonisation with the Board of Directors and the Remuneration Committee;

e. Under the annual evaluation process for members of the Executive Committee, the Committee shall be responsible for proposing, to the Remuneration Committee, criteria for determining variable remuneration, in particular individual performance goals;

f. Prepare an overall performance evaluation report for the Board of Directors and its various specialised committees, bearing in mind compliance with the Company's strategic plan, budget, risk management and internal operation, and the contribution of each member of these boards for this purpose, together with the relationship between the Company's boards and committees;

g. The Committee may also, whenever requested by the Board of Directors or Remuneration Committee, issue an opinion on the Executive Committee's general remuneration policy, as well as on the variable remuneration programs based on the allocation of NOS shares or stock options.

The Appointments and Assessments Committee shall observe the long-term interests of shareholders, investors and the general public, and, to the extent of its powers, shall contribute towards achieving social responsibility and sustainability goals.

In 2024, within the scope of its remit, the Appointments and Assessments Committee met once. The meeting presented and discussed the proposal for evaluating the executive members of the Board of Directors and the respective achievement of the KPIs, as described in the Remuneration Policy, with reference to the year 2023. Minutes of the meeting were drawn up and attendance was 100%.

ETHICS COMMITTEE

The Ethics Committee's mission is to publicise and monitor the NOS Group's Code of Ethics impartially and independently. This document is available at:

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/codigo-de-etica-geral-en-externa.pdf

The Committee consists of 3 members (non-executive director, Chairman of the Statutory Independent Audit Board and director in charge of People and Organisation) appointed by the Board of Directors.

On 31 December 2024, the Ethics Committee had the following composition:

 António Lobo Xavier	**Chairman of the Ethics Committee**
 José Pereira Alves	**Member of the Ethics Committee**
 Luís Nascimento	**Member of the Ethics Committee**

The Committee office is secretariat by the Internal Audit Director, Manuela Figueiredo.

The Regulations of the Ethics Committee can be consulted at:

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/regulamento-cde-fev2022-en.pdf

The Ethics Committee is responsible for, notably:

a. Receiving, analysing and responding to clarification requests involving the Code of Ethics and its compliance, whether through requests addressed to the management, to the People and Organisation Department or via an email address created for this purpose;

b. Analysing and investigating complaints of alleged breaches to the Code of Ethics, according to the respective competences;

c. Requesting that Internal Auditing investigate whatever is required at any given time, within the scope of its powers;

d. Preparing opinions on actions to be taken as a result of investigations carried out under subparagraph b.;

e. Promoting and monitoring the implementation of the Code of Ethics, namely with regard to communication, awareness and training initiatives for employees, suppliers and partners with a view to strengthening an ethical culture;

f. Issuing opinions, when requested, on codes of ethics, codes of conduct or professional ethical practices;

g. Revising, at the proposal of any body, commission, committee, unit or internal entity of the Company and whenever appropriate, the Code of Ethics and its procedures based on the Company's needs, and to submit it for the Corporate Governance and Sustainability Committee's approval;

h. Proposing policies, goals, instruments and indicators for the corporate ethical performance management system to the Corporate Governance and Sustainability Committee;

i. To ensure the conformity of the ethical performance management system with the requirements of the Company's internal control system;

j. Preparing and sending (annually) to the Corporate Governance and Sustainability Committee a report on relevant actions regarding corporate governance;

k. Drawing up and submitting annual activity reports to the Board of Directors;

l. Drawing up an annual activity report to address the Company's commitments in the area of sustainability.

In 2024, the Ethics Committee met 4 times, having (i) analysed a number of situations, (ii) made recommendations aimed at pursuing conduct based on ethical principles, (iii) monitored the communication and training plan for employees and partners, (iv) analysed its activities and (v) approved the activity indicators. Minutes were taken of these meetings and attendance was 100%.

The Ethics Committee also held a session open to all employees (broadcast internally in direct online format) called "Let's talk about Ethics", which focused on the topic of "Psychological Safety".

III. Supervision

a) Composition

30. Details of the supervisory body

The Statutory Independent Audit Board is the Company's independent supervisory body.

The supervision of NOS, with regard to the legal certification of the accounts, also includes a Statutory Auditor, who cannot be a member of the Statutory Independent Audit Board.

31. Composition of the supervisory body

The Statutory Independent Audit Board consists of 3 full members and 1 alternate member, elected at the General Shareholders' Meeting, which also elects the respective Chairman, for terms of office of 3 years.

While there is no provision in the Articles of Association establishing a minimum or maximum number of members of the Statutory Independent Audit Board, it must necessarily consist of a minimum of 3 full members and an alternate member, pursuant to the law.

The Statutory Independent Audit Board was elected at the Annual General Shareholders' Meeting on 21 April 2022 for the three-year term of 2022-2024, ending on 31 December 2024.

On 31 December 2024, the composition of the Statutory Independent Audit Board was as follows:

 José Pereira Alves	Chairman of the Statutory Independent Audit Board **First Appointment:** 8 May 2019
 Patrícia Teixeira Lopes	Member of the Statutory Independent Audit Board **First Appointment:** 26 April 2016
 Paulo Mota Pinto	Member of the Statutory Independent Audit Board **First Appointment:** 21 April 2008
 Ana Luísa Fonte	Alternate Member of the Statutory Independent Audit Board **First Appointment:** 8 May 2019

The Company believes that the composition of the Statutory Independent Audit Board, according to market practice in comparable companies, ensures the efficient execution of the duties entrusted to them and that this number is appropriate to the size of the Company and the complexity of the risks involved in its activity. This is reinforced by the existence of the Audit and Finance Committee which, within the scope of its competences, assists, advises and supports the Statutory Independent Audit Board in several of its functions, as described above in paragraph 29 of this Report.

32. Details of the independent members of the Statutory Independent Audit Board

The Statutory Independent Audit Board currently has 3 independent members: José Pereira Alves, Patrícia Teixeira Lopes and Ana Fonte.

33. Professional qualifications of the members of the Statutory Independent Audit Board and other curricular information

The members of the Company's Statutory Independent Audit Board are recognised as being of good repute and possess the academic and professional qualifications and experience appropriate to the performance of their supervisory duties, and is subject to the stipulations of paragraph 19 above on diversity issues.

For a better understanding of the effective qualifications, experience and availability of the members of the Statutory Independent Audit Board, the Annex to this Report describes the duties currently performed by the respective members, as well as their academic qualifications and professional activities.

b) Functioning

34. Rules on the functioning of the Statutory Independent Audit Board

The functioning and powers of the Statutory Independent Audit Board are defined in its Regulations, revised and approved on 26 April 2024, which are available at:

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/Statutory-Independent-Audit-Board-Regulations.pdf

35. Meetings held and attendance rate of the members of the Statutory Independent Audit Board

In 2024, within the scope of its competences, the Statutory Independent Audit Board met 11 times. At its meetings, in addition to other activities, the annual and quarterly financial statements were analysed and an opinion drawn up on them; the Group's policy on the provision of "non-audit services" was assessed; the Internal Audit activity and the conclusions of the respective work in the NOS Group of companies were monitored; the adequacy of the Internal Audit activity and independence was assessed; the Risk Management model applied to the NOS Group was monitored; the adequacy of the accounting policies adopted by the Group was analysed; and the budget review and forecast assumptions were presented. Minutes of the meetings were drawn up and the attendance rate of the members of the Statutory Independent Audit Board at meetings was 100%.

36. Availability of the members of the Statutory Independent Audit Board with details of any positions held simultaneously in other companies, within and outside the Group

The members of the Statutory Independent Audit Board have a high level of availability to perform their respective duties.

The Annex to this Report shows the positions held by the members of the Statutory Independent Audit Board in other companies.

c) Powers and Duties

37. Description of the procedures and criteria applicable to the intervention of the supervisory body for the purposes of contracting additional services from the external auditor

In order to safeguard the independence of external auditors, the Statutory Independent Audit Board, pursuant to its Regulations, has the following powers and duties in relation to the external audit:

a. Selects the statutory auditors or audit firm to be proposed to the General Shareholders' Meeting and justifiably recommends a preference for one of them;

b. It is the main counterpart of the External Auditor and the first recipient of the relevant reports, and is responsible, inter alia, for proposing the relevant remuneration and ensuring that the proper conditions for the provision of services are provided within the Company;

c. Annually assesses the External Auditor and proposes their dismissal or the termination of their service provision agreement to the competent body, whenever justified grounds exist for this purpose;

In addition, the Statutory Independent Audit Board approved Regulations for the provision of services by the External Auditors ("Regulations for the Provision of Services by Statutory Auditors"), which defines the rules applicable to services other than audit services ("Non-Audit Services") or related to audits ("Audit-Related Services") provided by the External Auditor to NOS and its subsidiaries that are included in the appropriate scope of consolidation, specifying the different audit services that cannot be performed by the Statutory Auditor and the procedures to assure its independence. These Regulations for the Provision of Services apply to services provided by the External Auditor and related companies, and the most up-to-date version, approved on 24 February 2022, is available at

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/regulamento-prestac%cc%a7a%cc%83o-servic%cc%a7os-roc-engvf.pdf

Under the terms of the aforementioned Regulations for the Provision of Services, the contracting of services other than auditing services or services related to auditing must be considered on the basis of exception or complementarity, respectively, and in accordance with the rules established in the same Regulations.

The annual fees for non-audit services cannot exceed an amount corresponding to 70% of the average fees paid for statutory audits from the last three financial years, provided to the Company and its subsidiary companies and included in the respective consolidation perimeter using the full consolidation method.

The provision of non-audit services by the Statutory Auditor/Statutory Auditing Firm requires the prior approval and authorisation of the Statutory Independent Audit Board, which adequately assesses the threats to independence arising from the provision of these services and the safeguarding measures applied in accordance with article 73 of Law no. 140/2015 of 7 September.

To this end, the Statutory Independent Audit Board must receive a proposal regarding the provision of services to be submitted for approval and authorisation, as well as any additional information that may be relevant, and it must comply with the following requirements:

a. Be clear about the services to be provided and the fees to be charged for them;

b. Contain a declaration of conformity with the principles of independence defined in article 2 of the Regulations for the Provision of Services;

c. Contain the rationale for the provision of services;

d. Contain the starting date of the provision of services and respective fees.

In accordance with the aforementioned Regulations on the Provision of Services, if a member of the Statutory Auditor/Statutory Auditing Firm network, which carries out the statutory audit of the accounts of NOS or its subsidiary companies, provides any non-audit services prohibited under article 5(1) of (EU) Regulation no. 537/2014 of the European Parliament and Council of 16 April 2014, to an entity based in a third country which is controlled by NOS or its subsidiary companies, the Statutory Auditor/Statutory Auditing Firm assesses whether the independence is compromised by such service provision by the member of the network, in accordance with article 5(5) of the mentioned Regulation (EU) no. 537/2014.

38. Other duties of the supervisory body

Pursuant to the Company's Articles of Association and the respective Regulations, and in addition to the stipulations of paragraph 34, it should be noted that the Statutory Independent Audit Board:

a. Assesses the functioning status and effectiveness of the risk management system, internal control system and internal auditing system, and oversees their effectiveness, proposing any adjustments deemed necessary, and serving as the recipient of their reports to ensure that risks actually assumed by the Company are consistent with the goals set by the Board of Directors or by the Executive Committee;

b. Receives reports of irregularities and, with the support of the commissions, committees or other internal units or entities under the terms of their respective competences, ensures the respective registration and processing, as well as taking the decisions that fall within its

competence in this matter, drawing up an annual report on the activity carried out under the Regulation on the Notification of Irregularities (*Whistleblowing*), the conclusions of which it reports to the Board of Directors;

c. Issues a prior opinion on relevant business activities with shareholders of qualified holdings, or entities with whom they are in any relationship or other related parties;

d. Issues an opinion on the Company's annual report and accounts, including the scope and process for preparing and disclosing them, as well as other financial information in relation to which the law requires the involvement of the Statutory Independent Audit Board;

e. Informs the Board of Directors of the statutory audit results and explains the way it helped to assess the integrity of the preparation and disclosure of the financial information process, as well as the role which the Statutory Independent Audit Board played in such process; and

f. Whenever deemed necessary, evaluates, in a timely manner in advance, and gives its prior opinion on any reports, documentation or information of a financial nature which are assessed by the Board of Directors and disclosed to the market, namely the preliminary announcements of quarterly results, or which must be submitted by the Company to any competent supervisory authority.

The Statutory Independent Audit Board also decides on the strategic lines and risk policy defined by the management body prior to its approval by the same, and also on the work plans and resources allocated to the internal control services, annually assessing compliance with the Company's strategic plan and budget and risk management. The Statutory Independent Audit Board has implemented mechanisms to periodically monitor and control (i) the risk management model, (ii) liquidity risk and interest rates, (iii) the current management of treasury operations and the accounting policies adopted by the Group, (iv) the main legal and tax disputes in progress and their possible impact on the accounts, and (v) fraud and corruption management procedures.

The Statutory Independent Audit Board also holds regular meetings with the Statutory Auditor to monitor the work of the same.

IV. Statutory Auditor

39. Details of the statutory audit firm and the partner representing it

Pursuant to the Company's Articles of Association, the Statutory Auditor or Statutory Auditing Firm, effective and alternate, is elected by the General Shareholders' Meeting acting on a proposal from the Statutory Independent Audit Board.

As at 31 December 2024, the composition of this corporate body was as follows:

Effective Statutory Auditor	KPMG & ASSOCIADOS - Sociedade de Revisores Oficiais de Contas, S.A., legal person no. 502161078, with registered office at Avenida Fontes Pereira de Melo, no. 41 - 15.º, 1069-006 Lisbon, registered with the Institute of Certified/Chartered Public Accountants [OROC] under number 189 and registered with the Portuguese Securities Market Commission [CMVM] under number 20161489, represented by **Pedro Jorge Quental e Cruz** (registered with the OROC under number 1765 and registered with the CMVM under number 20161607)
Alternate Statutory Auditor	**Luís Miguel Pedrosa Guerra**, registered with the OROC under number 1769 and with the CMVM under number 20161611

40. Indication of the number of years the statutory auditor has held consecutive office with the company and/or group

The Effective Statutory Auditor and his Alternate were appointed for the first time at the General Shareholders' Meeting of 12 April 2024.

41. Other services provided to the Company

Descriptions of other services provided by the Statutory Auditor to the Company can be found in paragraphs 46 and 47 of this Report.

V. External auditor

42. Details of the external auditor and its audit partner

On 31 December 2024, they carried out the auditing duties provided for in article 8 of the Portuguese Securities Code:

Effective Statutory Auditor	KPMG & ASSOCIADOS - Sociedade de Revisores Oficiais de Contas, S.A., legal person no. 502161078, with registered office at Avenida Fontes Pereira de Melo, no. 41 - 15.º, 1069-006 Lisbon, registered with the Institute of Certified/Chartered Public Accountants [OROC] under number 189 and registered with the Portuguese Securities Market Commission [CMVM] under number 20161489, represented by **Pedro Jorge Quental e Cruz** (registered with the OROC under number 1765 and registered with the CMVM under number 20161607)
Alternate Statutory Auditor	**Luís Miguel Pedrosa Guerra**, registered with the OROC under number 1769 and with the CMVM under number 20161611

43. Indication of the number of years in which the external auditor and the respective partner who represents him in the fulfilment of these duties have held office consecutively with the company and/or the group

The General Shareholders' Meeting of 12 April 2024 approved the proposal, signed by the Statutory Independent Audit Board, for the appointment for the first time of the Chartered Accountants KPMG & Associados - Sociedade de Revisores Oficiais de Contas, S.A..

The effective statutory audit partner, Pedro Jorge Quental e Cruz, and the alternate, Luís Miguel Pedrosa Guerra, have also held office since 2024.

44. Policy and frequency of rotation of the external auditor and the partner who represents him in the fulfilment of these duties

Neither the Articles of Association nor the internal regulations set out the periodic rotation of the External Auditor. However, the rules provided for in the Statutory Audit Bar Statute (EOROC) are applicable to the Statutory Auditor (including the respective partner), i.e., the maximum period of performance of duties by the partner of the statutory auditing firm that acts as the external auditor is 7 years and the maximum period of performance of duties by the statutory auditing company is 10 years.

45. Details of the body responsible for assessing the external auditor and how often this assessment is carried out

The Statutory Independent Audit Board is responsible for conducting an annual assessment of the External Auditor and proposing their dismissal or the termination of their service provision agreement to the competent body, whenever justified grounds exist for this purpose.

To this end, the Statutory Independent Audit Board completes an annual questionnaire assessing the External Auditor, which deals with issues such as independence, internal control, frequency of meetings and financial reporting.

In addition, questionnaires are also completed by the *Chief Financial Officer* (CFO), in coordination with the *Financial and Assurance Services* department, and by the External Auditor himself.

46. Non-audit work carried out by the external auditor for the company and/or for companies in a control relationship with it, as well as an indication of the internal procedures to approve the contracting of such services and a statement of the reasons for said contracting

In 2024, the following specific non-audit services were contracted by NOS or its subsidiaries:

a. Limited review of the consolidated financial statements of NOS, SGPS, S.A. for the three-month period ended March 31, 2024, the six-month period ended June 30, 2024 and the nine-month period ended September 30, 2024; and;

b. Limited assurance regarding the sustainability information ("sustainability report") of NOS, SGPS, S.A., for the year ended December 31, 2024, prepared in accordance with the requirements of the European Sustainability Reporting Standards ("ESRS"), contained in the Management Report (under the non-financial statement chapter), and regarding the reporting requirements of article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation) contained separately in the "sustainability report".

The provision of these services does not constitute a threat to the independence of the External Auditor, nor does it fall within the prohibited services provided for in article 5(1) of Regulation (EU) No. 537/2014 of the European Parliament and of the Council of 16 April 2014 and, given the nature of the services in question, there are efficiency gains that justify their provision by the External Auditor.

47. Details of the amount of annual remuneration paid by the company and/or legal persons in a control or group relationship to the auditor and other natural or legal persons belonging to the same network, and a breakdown of the percentage relating to the following services

In 2024, the NOS Group (the Company and the companies in a controlling or group relationship) paid the following amounts as fees to NOS' Statutory Auditor and External Auditor (KPMG & Associados - Sociedade de Revisores Oficiais de Contas, S.A. and its group of companies):

By the Company*	**155,826**	%
Cost of audit services (€)	94,400	61
Cost of reliability assurance services (€)	61,426	39
By entities belonging to the group*	**280,400**	**%**
Cost of audit services (€)	278,550	99
Cost of non-audit services (€)**	1,850	1
Total	**436,226**	**%**
Cost of audit and contractual services (€)	372,950	85
Cost of reliability assurance services (€)	61,426	14
Cost of non-audit services (€)	1,850	0

* Including individual and consolidated accounts

** General training on sustainability issues, which included the participation of NOS employees

In the 2024 financial period, non-audit services accounted for 17% of the fees for the statutory audit for that financial period. On a quarterly basis, the Statutory Independent Audit Board receives and analyses information on the fees and services provided by the External Auditor.

C. Internal Organisation

I. Articles of association

48. Rules applicable to the amendment of the Company's Articles of Association

Amendments to the Articles of Association, including those relating to capital increases, always depend on shareholder resolutions, and at least 50% of the shareholders must be present or represented at the first meeting.

Such resolutions are taken by the majority established by law, i.e. two-thirds of the votes cast, except where a second call is made and shareholders holding at least half of the share capital are present or represented, in which case such resolutions may be taken by a majority of the votes cast.

II. Notification of Irregularities

49. Notification means and policy of irregularities

NOS has methods for detecting and preventing irregularities, within the scope of the following policies:

a. Code of Ethics

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/codigo-de-etica-geral-en-externa.pdf

b. Code of Conduct on the Prevention of Corruption and Related Offences

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/codigo-de-conduta-de-prevencao-de-corrupccao-e-infracoes-conexas-en.pdf

c. Regulation on the Notification of Irregularities (Whistleblowing)

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/Regulamento%20Comunicacao%20de%20Irregularidades_fev2022_EN.pdf

d. Plan for the Prevention of Risks of Corruption and Related Offences

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/nos-plan-for-the-prevention-of-corruption-pub.pdf

e. NOS' internal control and risk management system, described in greater detail in paragraphs 50 et seq of this Report.

These Codes and the Regulation apply to all members of the governing bodies and employees of NOS Group (Employees), as well as, with the necessary adaptations, to all those who represent the NOS (Partners) and to any person or entity that provides services, on a long-term or temporary basis, to the NOS Group (Suppliers).

Any queries in connection with the above Codes or Regulation can be addressed in writing to the email address duvidas.etica@nos.pt (information exchanged in this context will be treated as confidential).

Any evidence of irregularities should be reported in writing, marked as "confidential", by letter to the postal address set up exclusively for this purpose – Apartado 4035, Loja CTT Senhora da Hora, 4461-901 Senhora da Hora – or by email to comunicar.irregularidades@nos.pt, the chosen reporting method being at the author's discretion. All communications shall be treated as confidential, unless expressly and unequivocally requested otherwise.

NOS, and all those involved, are bound by a duty of confidentiality, therefore all information communicated is treated as confidential and restricted. Requests for clarification and reports of alleged irregularities can be made anonymously (for example, by sending an anonymous letter to the postal address indicated above or by sending an email to an email address specifically created by the sender for this purpose) and will be dealt with by NOS, which guarantees their anonymity and confidence in the process. NOS guarantees non-retaliation to anyone who requests clarification, raises queries, reports an alleged irregularity or is involved in its investigation in good faith.

The channels for receiving requests for clarification and reporting irregularities are published on the NOS website, in Portuguese and English, and are available 24 hours a day, 7 days a week, including to non-employees of the Company, pursuant to the applicable law.

Communications are received, recorded and dealt with by the independent Internal Audit and then forwarded to the responsible body, the Statutory Independent Audit Board or the Ethics Committee, depending on the nature of the situation. The Statutory Independent Audit Board, an independent supervisory body, deals with all situations in connection with corruption or related offences. The Ethics Committee, which includes an independent member, handles other types of irregularities (for example, situations of improper behaviour or misuse of assets). Whenever it is deemed necessary, external auditors or other experts may be contracted to assist in the investigation, especially when the matters involved so justify.

The handling of alleged irregularities generally consists of the following stages: i) receipt; ii) confirmation of receipt to the author; iii) notification to the responsible body; iv) investigation (if feasible); v) reporting of conclusions; and vi) communication of the conclusion to the author (closure).

Reference deadlines are set for the processing process, namely through controls on the deadlines for notifying the author: i) 7 days for notification of receipt of the report; ii) 3 months from the date of receipt of the complaint for notification of measures to follow up on the complaint; and iii) 15 days for notification of the conclusion of the analysis.

III. Internal Control and Risk Management

50. Persons, bodies or committees responsible for internal auditing and/or for the implementation of internal control systems

The internal control and risk management system at NOS consists of various key parties with the following responsibilities:

Body/Committee/ Department	Responsibilities
Board of Directors	I Defining and approving NOS' strategy and main policies, including the Risk Management Policy I Deciding on matters that should be considered strategic due to their amount, risk or special characteristics I Supervising the internal control and risk management system at NOS, delegating its creation and operation to the Executive Committee
Executive Committee	I Creating and guaranteeing the functioning of NOS' internal control and risk management system, using the powers delegated by the Board of Directors I Debating and approving the risk assumptions goals, including risk acceptance levels, approving NOS' strategic plans and risk management policies, with a view to ensuring that the risks actually incurred are consistent with those goals, respecting the strategies and policies defined by the Board of Directors I Making proposals to the Board of Directors on matters of internal control and risk management of NOS that are considered strategic
Corporate Governance and Sustainability Committee (internal committee of the Board of Directors)	I Assisting and supporting the Board of Directors in carrying out its role of supervising corporate activity in terms of corporate governance, rules of conduct and environmental and social sustainability, including the protection of human and labour rights and anti-corruption practices I Ensuring the supervision of environmental, social and corporate governance risks (ESG risks) and the creation of mechanisms to mitigate and resolve any controversial situations associated with them I Ensuring full compliance with legal and regulatory requirements, recommendations and good practices relating to sustainability, proposing the guidelines for NOS' social, environmental and ethical responsibility policies, including, among others, principles and values for safeguarding the interests of the various stakeholders I Supervising and monitoring the implementation of the strategic plan for environmental, social and corporate governance sustainability and its alignment with the strategy.
Audit and Finance Committee (internal committee of the Board of Directors)	I As a specialised committee, advise the Board of Directors on certain matters, including those relating to the functions of External Audit, Internal Audit and Risk and Compliance, thereby reinforcing, in a complementary manner, the monitoring of these matters which is carried out by the Statutory Independent Audit Board
Statutory Independent Audit Board (independent body legally competent to supervise the company)	I Assessing the effectiveness of the functioning of the internal control and risk management systems and the internal audit system as an independent supervisory body with legal and statutory responsibility for these matters I Expressing an opinion on the work plan and the resources allocated to the Internal Audit services I Being the main point of contact of the External Audit and the first recipient of the respective reports, with responsibility, in particular, for proposing the respective remuneration and ensuring that the appropriate conditions for the provision of services are guaranteed within NOS I Assessing the External Audit on an annual basis and proposing to the competent body that it be dismissed or that the contract for its services be terminated whenever there is just cause for this I Giving an opinion on the strategic lines and the Risk Management Policy prior to its final approval by the Board of Directors I Assessing the degree of internal compliance and the performance of the risk management system, namely by being the recipient of: (i) the reports on the External Audit's assessment of the internal control system and (ii) the annual report on the Internal Control Manual prepared by the Risk and Compliance department I Receiving, recording and processing reports of communications of irregularities and taking the decisions that fall within its remit in this matter, supported by Internal Audit, as well as by commissions, committees or other units or entities internal or external to NOS under the terms of their respective competences I Assessing and giving an opinion, as an independent supervisory body, on issues of ethics and prevention of corruption
External Audit (Statutory Auditor)	I Verifying the effectiveness and functioning of the internal control mechanisms and reporting identified deficiencies to the Statutory Independent Audit Board I Verifying the Company's accounts, and issuing the respective legal certification of accounts and an audit report, in the exercise of its duties of public interest

Internal Audit	I Assessing risk exposure and verifying the effectiveness of risk management and internal controls for business processes and information and telecommunications systems, including risks related to ethics and the prevention of corruption I Proposing measures to improve internal controls, aimed at more effective management of business and technological risks I Monitoring the evolution of risk exposure associated with the main findings (observations) and non-compliance identified in the audits and report to the Statutory Independent Audit Board on these matters I Analysing, auditing and investigating indications of irregularities related to ethics and the prevention of corruption, communicated through the defined reporting channels, or whenever requested by the Statutory Independent Audit Board or the Ethics Committee, pursuant to the respective competences of these bodies
Risk and Compliance	I Promoting the awareness, measurement and management of business risks that interfere with the realisation of NOS' goals and value creation I Contributing with tools, methodologies, support and know-how to the areas I Promoting and monitoring the implementation of programmes, projects and actions aimed at bringing risk levels closer to the acceptable limits established by the Company's management I Assisting the NOS Chief Compliance Officer in performing their duties as the person responsible for adopting and implementing the Code of Conduct on the Prevention of Corruption and Related Offences and the compliance programmes arising therefrom
Risk Committees (specialised committees)	I Analysing and commenting on specific risk-related issues. NOS has the following Risk Committees, specialised bodies consisting of experts in these areas: the Ethics Committee for Ethics risks, the Sustainability Forum for ESG risks, the SGI Forum for Quality, Environment and OHS risks, the Diversity and Inclusion Committee for Diversity and Equal Opportunities risks and the S&P Committee for Security & Privacy risks I Reporting regularly to the board, with the participation or sponsorship of members of the Executive Committee or non-executive directors who liaise with the management on these matters
Business unit areas	I Implementing internal controls and risk management specific to each area of NOS' business units, as part of their responsibility in corporate or functional processes I Participating in specific risk management work teams or teams required for the development of certain risk management programmes. The areas can also be part of specialised Risk Committees, represented by Directors and/or Pivots/Champions from key areas of the organisation in the risk areas in question.

51. Organisational structure, of hierarchical and/or functional dependence relationships with other company bodies or committees

The hierarchical and functional dependence relationships of the Internal Audit and Risk and Compliance areas with other company bodies, commissions or committees is as follows:

The Internal Audit and Risk and Compliance departments report hierarchically to the NOS Executive Committee:

- According to the stipulations of the Internal Audit Charter, Internal Audit is an independent and objective activity and must be free from interference by any person or body in the organisation.
- The Internal Audit Director (CAE - Chief Audit Executive) reports to the NOS Executive Committee, namely to the CCO - Chief Compliance Officer, and accumulates the responsibility of being the Chief Risk and Compliance Officer (CRO - Chief Risk Officer), as they have no responsibilities or authority over the organisation's operations or assets, and are independent of the business areas. The synergy arising from the combination of these Audit, Risk and Compliance responsibilities contributes to more effective management of NOS' business risks.

The Internal Audit and Risk and Compliance departments report functionally to the Statutory Independent Audit Board of NOS, as an independent supervisory body with legal and statutory responsibility for assessing the effectiveness of the functioning of the internal audit system and the internal control and risk management systems:

- The Statutory Independent Audit Board is the recipient of the reports and must give its opinion on the work plan and the resources allocated to the Internal Audit services, proposing any necessary adjustments.
- The Statutory Independent Audit Board shall evaluate the degree of internal compliance and the performance of the risk management system, in particular by receiving the reports on the External Audit evaluation of the internal control system.
- The Statutory Independent Audit Board is also the recipient of the annual report on the Internal Control Manual (including indicators on effectiveness, coverage, etc.) prepared by the Risk and Compliance department.
- The Statutory Independent Audit Board is also the recipient of other reports that may prove relevant, on matters such as the identification or resolution of conflicts of interest and the detection of potential irregularities, prepared by the Internal Audit department.
- The aforementioned assessments and reports may result in the need for adjustments to the internal control and risk management systems, to be implemented by the management bodies, by other bodies, by the Audit, Risk and Compliance functions, or by other areas of the organisation, as applicable.

The **Internal Audit** department **supports** the **Statutory Independent Audit Board** in receiving, registering and processing reports of communications of irregularities received by NOS, in line with the provisions of the Regulations on the Notification of Irregularities (Whistleblowing).

The **Internal Audit** department **serves as secretary** of the NOS **Ethics Committee**, which is the committee responsible for supervising and maintaining the Code of Ethics and monitoring its application. The activities carried out by the Ethics Committee are reported at least annually to the **Corporate Governance and Sustainability Committee.**

The **Internal Audit and Risk and Compliance** departments also report **functionally** to the NOS **Audit and Finance Committee**, which is a specialised committee that advises the Board of Directors on certain matters, including those relating to the Internal Audit and Risk and Compliance functions, thus reinforcing, in a complementary manner, the supervision of these matters that is already carried out by the Statutory Independent Audit Board.

The **Risk and Compliance** department **coordinates the NOS Security & Privacy Committee**, through the central Security & Privacy team, which is the team responsible for supporting the areas of the organisation in coordinating the Security, Privacy and Continuity programmes.

The **Risk and Compliance** department **coordinates NOS' SGI Forum**, through the Corporate Compliance and Monitoring team, which is the team responsible for ensuring the management of the Integrated Management System (SGI) Coordination Committee, which ensures the sharing of matters related to Quality, Environment and OHS risks.

With regard to the way the Company organises its **specialised Risk Committees:**

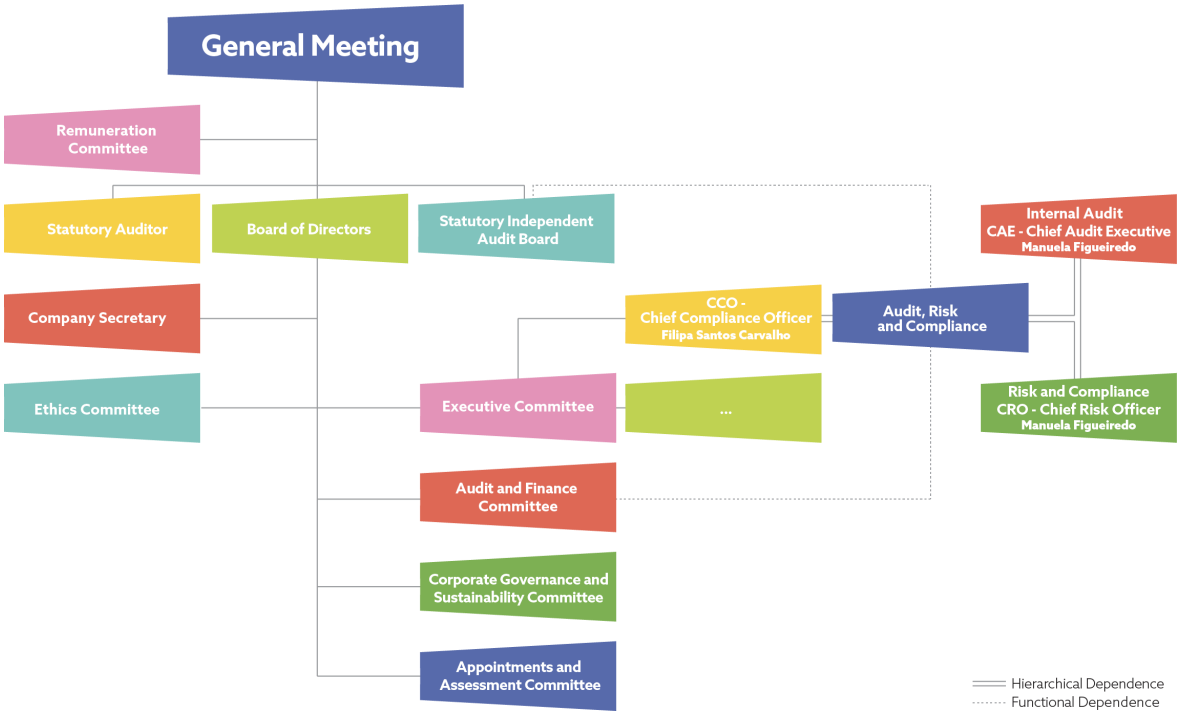
- The Risk Committees are specialised bodies that analyse and report on specific risk-related issues.
- The Company has the following specialised Risk Committees: the Ethics Committee for Ethics risks, the Sustainability Forum for ESG risks, the SGI Forum for Quality, Environment and OHS risks, the Diversity and Inclusion Committee for Diversity and Equal Opportunities risks, and the S&P Committee for Security & Privacy risks.

- The Risk Committees consist of specialists in the respective risk areas, and may include Directors and/or Pivots/Champions who represent key areas of the organisation in the issues in question.
- The Risk Committees depend on the participation or sponsorship of members of the Executive Committee or non-executive directors who liaise with the management on these matters.
- Risk-related matters are reported to the management body.
- In addition, risk-related matters are reported to the independent supervisory body, the Statutory Independent Audit Board, as well as to the body advising the Board of Directors on these matters, the Audit and Finance Committee.

With regard to the **supervision of the internal control and risk management system** at NOS, it is also important to emphasise the way the Board of Directors intervenes in setting risk-assumption goals and their pursuit, as a management body:

- The Board of Directors discusses and approves the Risk Management Policy proposed by the Executive Committee. The Statutory Independent Audit Board assesses and gives its opinion on this policy prior to final approval by the Board of Directors.
- The Board of Directors discusses and approves the Company's strategic plans, proposed by the Executive Committee, and these plans do not exceed the risk assumption limits.
- The Executive Committee ensures the functioning of the organisation's internal control and risk management system, using the powers delegated by the Board of Directors.
- In any case, it remains the responsibility of the Board of Directors (a responsibility not delegated to the Executive Committee) to decide on matters that should be considered strategic due to their amount, risk or special characteristics.
- The Board of Directors receives the relevant reports resulting from the Risk Assessments from the Executive Committee, which is a periodic control mechanism that seeks to ensure that the risks actually incurred by the Company are consistent with the goals set by the Board of Directors as a management body.

The remaining responsibilities for the creation, functioning and periodic assessment of the internal control and risk management system are defined in the Regulations of corresponding Company's bodies or committees.



52. Other functional areas with risk control competences

In addition to the entities mentioned in the previous sections, the Company must have other functional areas with competence in internal controls and risk management, which contribute decisively to the maintenance and improvement of the control environment. In this regard, we wish to emphasise the following business areas and processes:

- The areas of **Planning and Control**, in coordination with the corresponding pivots in the areas of business, are responsible for **monitoring the implementation of Annual Action and Resource Plans** (as part of NOS' strategic plans) and the corresponding budgets and forecasts, in the financial and operational components;

- The **Investor Relations and Sustainability** area is responsible for coordinating the management of the corporate sustainability strategy, together with the various areas of NOS that ensure its operational implementation, as well as monitoring the implementation of this strategy by compiling internal and external Key Performance Indicators on the performance of NOS' **environmental and social sustainability** (ESG Scorecard). The Investor Relations and Sustainability area is also responsible for coordinating the **Sustainability Forum**, which includes members of the Executive Committee and Directors and/or representatives of the departments with the greatest impact on ESG strategy and performance, and which acts as a support platform for reinforcing knowledge on ESG issues for members of the management bodies. The **Corporate Governance and Sustainability Committee** is responsible for supervising environmental, social and corporate governance risks and creating mechanisms to mitigate and resolve any controversial situations associated with them. This Committee, in conjunction with the **Sustainability Forum**, monitors the main developments in environmental and social sustainability. In this regard, the Company implements processes to collect and process data related to environmental and social

sustainability, to alert the management body to the respective risks and to propose strategies to mitigate them;

- The **Financial and Assurance Services** areas have central responsibility for managing the **risks related to financial information**, as described elsewhere in this Report;
- The **Legal and Regulatory** areas monitor changes in the **applicable legal and regulatory framework** and the respective risks, taking into account the threats and opportunities they represent for NOS' competitive position;
- The **Risk Assurance** (control of use, subscription fraud, consumption, content, etc.), **Network and Service Supervision** (network and service availability, management of interruption incidents, etc.) and **Cybersecurity** (monitoring cyber threats and vulnerabilities, managing cyber incidents, etc.) teams monitor **risks intrinsic** to NOS' activity;
- The **technology areas**, including **Networks, Information Systems** and **Cybersecurity**, have indicators and alerts that support the management of service **interruption risks** and **security** incidents at operational level;
- The **Market & Customer Intelligence** area, together with other areas of the organisation, uses **Advanced Analytics** techniques that incorporate **Artificial Intelligence** mechanisms, especially in the massive processing of data for **operational improvement and customer experience issues**. This type of information is one of several inputs for decision-making about the business and operations. As regards the governing bodies, they do not take any automated decisions, nor any decisions based exclusively on Artificial Intelligence mechanisms. The Market & Customer Intelligence area, namely through the CoE of Advanced Analytics, within its scope of action, also provides expert advice and know-how to the various areas of the organisation on best practices in the implementation and application of Advanced Analytics/Artificial Intelligence mechanisms;
- The various **business unit areas of the organisation** incorporate the risks and opportunities related to **climate change** into their decision-making processes. Climate change is one of the four pillars of NOS' Sustainability Strategy: "On Behalf of the Planet". Throughout the various sections of the Integrated Annual Report, NOS presents how the risks and opportunities associated with climate change are considered in the organisation's decision-making processes, including how these are incorporated into both the Sustainability goals and strategy and the overall goals and strategy of NOS (see, as an example, in the Non-Financial Statements the sections related to "IRO (Impacts, Risks and Opportunities) Management" in particular chapters '1.3.1.10. Impacts, Risks and Opportunities (SBM-3)' and '1.3.2.1.2 Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3/IRO-1)';
- The various **areas of business and individual employees** are required to comply with the procedures set out in the **Internal Control Manual**, ensuring that all acts or transactions engaged in are appropriate and properly evidenced;
- The various **areas of the organisation** have **internal controls** that ensure not only the commitment of the areas to internal control and risk management, but also the permanent monitoring of the design of the effectiveness and adequacy of these controls, as well as having **processes and indicators to monitor operations and Key Performance Indicators**.

53. Details and description of the main types of risks (economic, financial and legal) to which the company is exposed in the course of its business activity

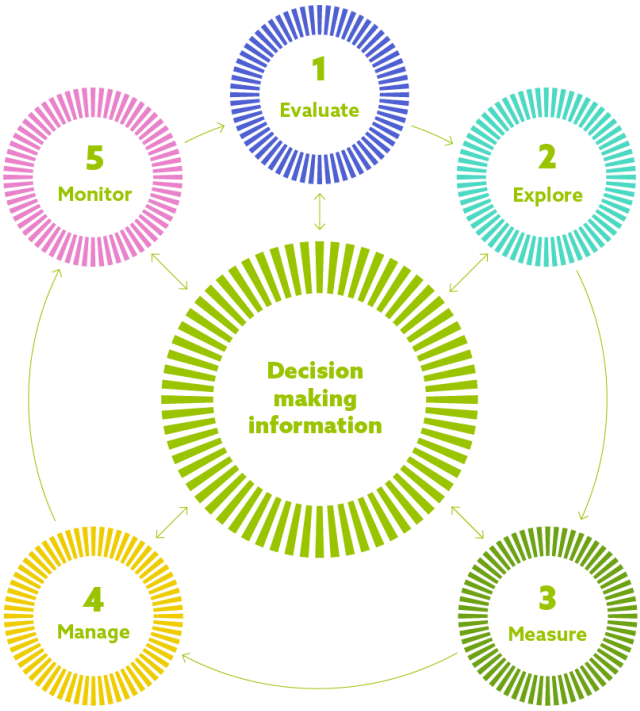
The Company is exposed to economic, financial and legal risks arising from its business activities.

This section describes the process of selecting **relevant risks**, including the **identification**, **description and evaluation** of the risks, as well as the main respective **strategies and actions** for managing and mitigating the risks and for following up on and monitoring them.

The risk management process is supported by the Enterprise Risk Management (ERM) methodology, a consistent, systematic methodology based on best practices and international standards.

NOS | Risk Management Process

The process follows five phases to prepare information for decision-making, which can be applied either at the corporate level of the NOS Group's companies/businesses or at the level of specific processes/projects: 1. Evaluate; 2. Explore; 3. Measure; 4. Manage; and 5. Monitor.



The process of identifying and **selecting the relevant risks for the year 2024** was based on the NOS Business Risk Model, the risk dictionary in force at NOS, which is broken down into 5 categories, 19 subcategories of risk and 82 risks. Of the total of 82 risks constituting the NOS Business Risk Model, 27 risks were identified as relevant, of which only 5 have a ≥ high risk level.

NOS | BRM - Business Risk Model

Global dictionary of NOS risks and emphasis of risks considered relevant in the 2022-2024 cycle:

Business environment

Politics and Economy
- Political Environment
- Economic Environment

Sector and Market P&S
- Sector/Market Attractiveness
- Mergers and Acquisitions
- Competition
- Technological Innovation
- Consumer preferences

Shareholders and Financial Markets
- Shareholders relations
- Funding and Capital
- Financial Markets
- Interest Rate
- Exchange Rate

Legislation and Regulations
- Legal
- Regulation

Governance

Corporate Governance
- Government Practices
- Social responsibility
- Relations with Official Entities
- Ethics
- Management Fraud
- Corruption and Related Offenses

Organization
- Structure and Organizational Agility
- Skill Segregation and Delegation

Business strategy

Strategy and Planning
- Business Portfolio
- Life cycle
- Planning and Control
- Performance Monitoring
- Strategic Partnerships
- Investment Assessment and Decision

Brand and Reputation
- Brand
- Reputation
- External Communication
- Sponsorship and Patronage

Financial

Financial Performance
- Liquidity
- FCF | EBITDA- CAPEX
- FCF | Working Capital

Financial investments
- Financial Assets or Real Estate

Accounting and Reporting
- Accounting Practices
- Taxation
- Financial Reporting

Operational

People
- Leadership
- Skills and Training
- Resistance to change
- Internal Communication & Sharing
- Performance & Recognition
- Recruiting and Talent Retention
- Human Rights, Diversity and Inclusion
- Occupational Health and Safety
- Well-being

Tec-Op. Resources
- Network and Systems Dev.&Op
- Facilities Dev.&Op
- Procurement and Suppliers
- Rights and Licenses Management

Processes
- Communication and Strategy Alignment
- Digital Transformation
- Process Efficacy and Agility
- Process Efficiency and Performance
- Compliance
- Contractual Commitments

Environment
- Environmental impacts
- Climate change

P&S and Customer Satisfaction
- Agile Development of P&S
- Sustainable P&S
- P&S Communication
- P&S Pricing
- P&S Sales and Distribution
- P&S Performance
- Customer Experience Quality
- Service Management Quality (B2B)
- Customer awareness and retention
- Customer Credit and Collections

Partners
- Partner/Outsourcing Management
- Partners/Third Parties Credit and Collections

Business Assurance
- Revenues and Cost Assurance
- Employee/Partner Fraud
- Customer/Third Party Fraud

Security & Privacy
- Confidentiality
- Integrity
- Availability / Resilience
- Privacy
- Cybersecurity
- Catastrophic Losses/ Business Continuity

● Risk ● Relevant Risk ● Relevant Risk 2022-2024 context (Top 10)

27 relevant risks were identified based on the results of 4 criteria: contextual risks, risks intrinsic to NOS activities, sustainability risks (ESG) and financial risks.

1. Context Risks (Top 10)
   - These are the risks with the highest probability and/or impact (Top 10) for the NOS context, resulting from the corporate risk assessment exercise carried out by the NOS Executive Committee in 2022. A more in-depth identification and assessment of risks is carried out every 3 years ("zero base" review) and revisions and adjustments are incorporated annually.
   - Relevant risks were also considered to be those identified in the specific risk assessments for the following certifications: ISO 27001 - Information Security Management System; and ISO 20000 - Service Management System.

2. Intrinsic Risks (to NOS activities)
   - These are the main risks to which NOS' businesses and activities are intrinsically subject, in addition to those that may already be considered in the Top 10 in relation to the contextual risks.

3. Sustainability Risks (ESG)
   - These are the risks most directly associated with environmental, social and corporate governance (ESG) issues.
   - Relevant risks were also considered to be those identified in the specific risk assessments for these certifications: ISO 9001 - Quality Management System; ISO 14001 - Environmental Management System; and ISO 45001 - Occupational Health and Safety Management System.
   - Throughout the **Non-Financial Statements**, specifically in chapter "1.3.1.10 Management of Impacts, Risks and Opportunities (SBM-3)", more specific information can be found on ESG Impacts, Risks and Opportunities, including how they are identified and assessed, as well as the respective management and monitoring action.

4. Financial Risks
   - These are the main financial risks identified by the External Financial Auditor, in accordance with the standard: ISA 701 - KAM - Key Audit Matters.
   - More specific information on financial risk management policies and how the risks associated with the financial statements are managed and controlled can be found in the "**Policies and Risk Management**" section of the **Notes to the Financial Statements**.

NOS | Risk Matrix

The matrix shows the relevant risks, organised into 4 clusters, which correspond to the above-mentioned identification criteria. In each of the clusters, the risks are organised in the order in which they appear in the BRM's risk subcategories. In the matrix, the risks are categorised as **Economic**, **Financial** or **Legal**.

In the matrix, the risks are also categorised by **risk level** (according to the scale shown, from 1 to 5). For risks assessed above the tolerance level, i.e. risks with a level greater than or equal to High (≥3), according to the NOS methodology, it is mandatory to identify the possible causes and define the mitigation action. Furthermore, even for the set of relevant risks that do not exceed the tolerance level, the NOS also monitors and reports on the causes and actions of these risks because they are relevant to the NOS Context (e.g. Recruitment and Retention of Talent; Privacy; Cybersecurity; Business Continuity), because they are intrinsic to the company's activity (e.g. Technological Innovation; Customer/Third Party Fraud), because they are relevant from the point of view of Sustainability (e.g. Human Rights, Diversity and Inclusion; Corruption and Related Offences; Quality Customer Experience; Health and Safety at Work; Climate Change) or because they are key risks from a financial point of view (e.g.: Interest Rate; Liquidity).

Regarding the **timeline of risks**, Context Risks are the most potentially significant in the short term (1 to 3 year cycle), considering the fact that they have been assessed with a higher risk level (Top 10) for NOS' current context. By their nature and because they have a lower level of risk at NOS, Financial Risks, Risks Intrinsic to the company's activity and Sustainability Risks are risks that the Company has been identifying systematically over the years, which is why we consider them to be medium-term risks (3 to 5 years) and long-term risks (more than 5 years), which are relevant to continue monitoring.

Intrinsic Risks	Context Risks (Top 10)
Economic Risks	**Economic Risks**
2 Technological Innovation	3 Economic Environment
2 Digital Transformation	3 Competition
1 Revenues and Costs Assurance	2 Talent Recruitment and Retention
1 Customer/Third Party Fraud	2 P&S performance
	2 Availability/Resilience
	2 Privacy
	3 Cybersecurity
	2 Business Continuity / Catastrophic Losses
	Legal Risks
	3 Legal
	3 Regulation
Economic Risks	**Financial Risks**
1 Social Responsibility	1 Interest rate
1 Human Rights, Diversity & Inclusion	1 Credit and Collections
1 Corruption and Related Offenses	1 Liquidity
1 Occupational Health and Safety	1 Taxation
1 Sustainable P&S	
1 P&S Communication	
2 Customer Experience Quality	
1 Environmental Impacts	
1 Climate Change	
Sustainability Risks	**Financial Risks**

1	Low
2	Medium
3	High
4	Very high
5	Catastrophic

NOS | Risks versus Action

The following tables summarise the **risks and main causes**, as well as the respective **risk management and mitigation and follow-up and monitoring action**. The **opportunities associated** with the risk factors are also identified, reconciling the protection of the business against risks with the maximisation of value for stakeholders.

This **summary** focuses on the **Contextual Risks (Top 10)** and on the **Intrinsic Risks**. More specific information on **Sustainability Risks (ESG)** can be found throughout the **Non-Financial Statements** (specifically in chapter "1.3.1.10 Management of Impacts, Risks and Opportunities (SBM-3)"), and those of the **Financial Risks** can be found in the **Notes to the Financial Statements**.

- Context Risks (Top 10)

Risks	Actions	Opportunities
Economic Environment I Unfavourable macroeconomic conditions, due to the geopolitical and economic consequences of conflicts with a global impact (e.g. Ukraine, Middle East) I Global inflationary pressure with an impact on the cost structure (e.g. labour-intensive external services). I Variations in the cost of energy and shortages and rises in the cost of various raw materials (an effect that still partially remains as a result of the conflict in Ukraine and other global conflicts).	I Exploration of alternatives to optimise the operating cost structure and mitigate inflationary pressures, e.g. by renegotiating relevant supply contracts and monitoring material prices to assess better timing of purchase. I Positive effect on the cost structure resulting from the optimisation of energy costs, as a result of cost variation on the market, action to control and/or fix the purchase price of energy and the implementation of measures to reduce energy use in the network, offices and cinemas.	I Reduced energy consumption. I Reduced carbon footprint. I Cost optimisation.
Competition I Increased competitive intensity of the market (including new entrant), potential reduction in market share and/or loss of customers, potential difficulty in obtaining and retaining customers.	I Strategy of constant improvement of quality, differentiation and innovation of products and services, protection and diversification of the offer, cross-cutting offers between NOS businesses. I Strengthening the portfolio of new businesses/brands in the B2C and B2B segments over the past few years (e.g. NOS Insurance, NOS Alarms, NOS Smart Home, Ten Twenty One). I Consolidation of the offer to protect specific segments of the telco market I Additional information in the sections "1.1.5 Activity and Portfolio" and "1.2.1 Review of our performance in the year".	I Possible new opportunities for expanding the business portfolio. I Extension of customer revenue sources.
Legal + Regulatory I Changes in legislation or regulation, whether European or national, can significantly increase the regulatory burden and requirements over the years and can have an impact on the company's operations. I Supervision and possible prosecutions and fines: from sector-specific regulators, such as ANACOM for the electronic communications business and the Media Regulatory Authority (ERC) for television services and audiovisual content provision activities; from cross-cutting regulators, such as the Competition Authority (AdC), the National Data Protection Commission (CNPD) and the National Cybersecurity Centre (CNCS).	I Projects and initiatives to address and ensure compliance with changes in legislation and regulation that impact NOS, involving the corporate, business and technological areas necessary for their implementation, with emphasis on increasing regulation in the areas of cybersecurity, data protection, artificial intelligence, environment, health and safety, prevention of corruption, market and competition. I The activity of the Legal department and the Regulatory department, which monitor changes in the applicable legal and regulatory framework, including interaction with regulators, participation in public consultations, responding to lawsuits and disputing fines. I Existence of the RCN - Responsible for Regulatory Compliance or CCO - Chief Compliance Officer.	I Identification of possible opportunities for the competitive position of NOS companies in the business sectors in which it operates, as a result of analysing the threats and opportunities associated with changes in legislation and regulation and adapting international sector trends (via benchmarking).

Talent Recruitment and Retention | Non-effective recruitment, talent management or resource retention policies or practices. | Shortage of technological/digital profiles, due to the globalisation of the labour market and the greater demand for this type of profile by companies.	| Consolidation of improvements in various People and Organisation processes, with emphasis on the "Talent Acquisition", "Employee Experience" and "People Relations" processes, accompanied by improvements in some of the support platforms. | NOS Alfa Programmes (e.g. Alfa Biz, Alfa Tech, Alfa Data) for the selection and recruitment of highly talented recent graduates, including approaches to universities in technological areas. | NOS Leadershift Programme (training, coaching and leadership development) with the aim of empowering the different levels of leadership at NOS, creating the conditions to accelerate the organisation's transformation (with the motto "Whoever does, leads the team behind"). | Carrying out the Organisational Climate Survey (+SAT) annually with all NOS Employees and sharing the results with the different levels of leadership as input for improvement actions. | Hybrid working model (face-to-face and remote days) for the majority of employees, including flexibility mechanisms. | Additional information in the Non-Financial Statements in the section "1.3.2.1. ESRS S1 - Own labour".	| Increased attractiveness of NOS as an employer. | Increased employee satisfaction. | Decrease in the cost of replacing key resources with a high degree of knowledge or specialisation.
P&S Performance | Products & Services potentially subject to non-conformities, failures or problems with performance and reliability, which may not fulfil customer expectations or result in complaints. | Possibility of communications services with lower quality than desired (e.g. network coverage and quality, speed of service execution/delivery, unsuitable equipment).	| Application of analytical models to proactively identify causes of service degradation, speed up the detection and resolution of faults and recommend the best solutions to customers. | Continuing to strengthen the capacity of mobile and fixed networks in response to changing standards and the increased needs of residential and business customers in the growing context of remote working and digitalisation. | Continued introduction of new equipment enabling better quality of service (e.g. new TV boxes; Wi-Fi routers; smart Wi-Fi). | Existence of civil liability and professional civil liability insurance, applicable to customer claims related to physical damage caused by NOS or service failures with breach of contract with proven impacts on the customer. | Technological leadership in the quality of mobile services validated by independent agencies (Ookla has recognised NOS' 5G network as the fastest in Portugal since 2023 and Open Signal marked NOS as the best global mobile network in several criteria, including download and upload speed experience, coverage and consistency). | Additional information in the sections "1.1.5 Activity and Portfolio" and "1.2.1 Review of our performance in the year".	| Increased customer satisfaction. | Proactive approach in identifying problems with services and resolving them preventively. | Decrease in customer management/support operating costs.
Availability/Resilience + Business Continuity/Catastrophic Losses | The possibility that information or technological resources may become unavailable, or not have the resilience capabilities necessary to withstand an incident, and to continue providing the Company's information and services. | Possibility of the Company not being able to maintain business continuity, including critical activities, or the supply of priority products and services, as a result of a catastrophic event caused by a natural disaster or the interruption/critical disruption of technical-operational resources (e.g. systems, network platforms, physical	| Business Continuity Management (BCM) Programme covering facilities, network infrastructures, business activities and the most critical roles that support communications services. For these areas, the company develops and maintains plans/action to improve the availability and resilience of services and incident/crisis management plans/procedures. Additional information in the Non-Financial Statement in the sections related to "1.3.3.4. ESRS S4 Consumers and Users" and "1.3.2.1 ESRS E1 - Climate Change".	| Increasing the Company's response capacity to prevent incidents from becoming major crises, ensuring the continuity of critical activities and services for the community. | Reinforced protection of the Company's reputation and image.

infrastructures, other assets), human resources (e.g. pandemics), financial resources or other key resources.		
Privacy | Possible failure to comply with personal data protection rules.	| Programme of initiatives to implement processes for the Protection of Personal Data, as well as to monitor and continuously improve compliance with the General Data Protection Regulation (GDPR) and other regulations with an impact on privacy. | Privacy Policies and Rules are regularly updated and disseminated via training. | Existence of the NOS Data Protection Officer (DPO - Data Protection Officer). | Additional information in the Non-Financial Statements in the section "1.3.3.4 ESRS S4 Consumers and End Users" / "Security and Privacy".	| Increased confidence on the part of customers and employees in the protection of their personal information.
Cybersecurity | Critical resources (systems, network platforms, infrastructures, other assets) potentially exposed to security vulnerabilities that make them subject to attacks, intrusions, alterations, destruction or other threats, from internal or external sources (e.g. ransomware, malware, phishing). | General increase in cyber-attacks with significant national and international impact, aimed at compromising the information security of individuals and companies and causing interruptions to essential services for the community.	| Set of initiatives to improve operational procedures, continuous monitoring and technical cybersecurity protection and contingency measures. | Information Security Policies and Rules are regularly updated and disseminated via training. | Continued strengthening of the set of technological tools used to prevent, detect and respond to cybersecurity incidents. | Continued strengthening of the Cybersecurity team in its various specialities. | Existence of the CISO - Chief Information Security Officer at NOS. | Additional information in the Non-Financial Statements in the section "1.3.3.4 ESRS S4 Consumers and End Users" / "Security and Privacy".	| Increased confidence on the part of customers and the community in the company's ability to defend itself against cyber attacks, protecting information and ensuring critical services. | Expanding the offer of cybersecurity services for B2B customers.

- Intrinsic Risks

Risks	Actions	Opportunities
Technological Innovation | Possibility of the Company not being able to take advantage of, monitor investment or monetise technological advances adequately to achieve or maintain a competitive advantage (e.g. 5G deployment, 5G use cases, cloud services, managed services)	| Various initiatives to promote the application of 5G use cases, in particular the existence of the 5G Fund sponsored by NOS and the NOS Hub 5G. | Existence of the Open Innovation Programme, developed within the scope of the Test Bed 5G & Digital Transformation which seeks to help start-ups accelerate the development, testing and experimentation of innovative products and services based on 5G. | Pioneering launch in Portugal of 5G Standalone (new 5G Standalone data core developed in partnership with Nokia). | Expansion of the NOS Smart Home business line, an offer of equipment and services for real estate developers who want to put a smart home solution in their developments. | Continuous strengthening of the portfolio of services for B2B clients (e.g. Cloud, managed services, cybersecurity). | Additional information in the sections "1.1.3 Some moments that marked our year", "1.1.6 Our Strategy" and "1.2.1 Review of our performance in the year".	| Telecommunications market leadership through network leadership and 5G experience, challenging and supporting the community to evolve with 5G. | Expansion of service portfolio (Smart Home), leveraging on synergies and successful experiences in similar services (Alarms). | Expansion of the low-carbon services portfolio, especially for B2B customers, taking advantage of the technological innovations resulting from the use of electronic communications in conjunction with solutions based on IoT and Cloud.
Digital Transformation | Changes in consumer profile (from physical to virtual). | The Company's possible inability to	| Intensive and massive data processing (e.g. Big Data, Advanced Analytics), supported by new technologies (e.g. Cloud, Data Lake, Machine Learning, Artificial Intelligence), have made it possible to automate processes and	| Optimisation and simplification of internal and customer processes. | Increasing customer satisfaction. | Creating

guarantee the digital transformation of traditional business processes.	apply analytical models that enable a deeper understanding of changes in consumer profiles. | Continued expansion of the RPA Programme - Robotic Process Automation | Digitisation of business processes with an impact on the customer: improvements to features in NOS Apps, increasing promotion of electronic invoicing, digitisation of processes in NOS shops, robotisation of internal customer management processes. | Additional information in the "1.3.3.3 ESRS S3 Affected Communities" and "1.3.3.4 ESRS S4 Consumers and End Users" sections.	customer journeys that are more personalised and tailored to customers. | Expanding the portfolio of low-carbon services, taking advantage of the growing digital transformation needs of B2B customers supported by new technologies.
Guaranteeing Revenues and Costs | Inherent operational risks related to guaranteeing and monitoring customer revenues and costs, from a perspective of revenue flows and platform integrity.	| Dedicated Revenue Management and Control team (Revenue Assurance) that applies revenue integrity control (under- or over-invoicing) and cost control processes. | Invoicing processes (billing) with the execution of revenue controls, regarding the quality of billing.	| Reduction of revenue losses or service costs. | Improved customer satisfaction through the quality and integrity of the service invoices they receive.
Customer/Third-Party Fraud | Fraudulent customers or third parties can take advantage of potential vulnerabilities in business processes, the network or communications services.	| Teams dedicated to fraud control, including subscription fraud, consumption fraud and content fraud. | Fraud monitoring and control processes, in order to avoid anomalous situations of fraudulent consumption or misuse of services (examples: illegal provision of TV channel content, phishing actions via SMS targeting NOS customers). | Additional information in the Non-Financial Statements in the "1.3.3.4 ESRS S4 Consumers and End Users" section.	| Decrease in adverse impacts on customer satisfaction and any service disruptions. | Reduction of service revenue losses.

54. Description of the process for identifying, evaluating, monitoring, controlling and managing risks

NOS has a **Risk Management Policy** which defines the methodologies, the intervening entities and their responsibilities (available at https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/nos-politica-de-gesta%cc%83o-de-risco-dez-2019-eng.pdf), in particular the sections "3.1.1. Risk management methodologies" and following.

The methodologies adopted for risk management and internal control take into account the references provided by the bodies responsible for promoting the existence of control mechanisms in the markets, including the principles and recommendations of the **IPCG** (Portuguese Institute of Corporate Governance) **Corporate Governance Code**. The methodologies also consider the applicable **legal and regulatory requirements**.

In addition, for internal control aspects relating to ICT (Information and Communication Technologies) frameworks such as **COBIT** (Control Objectives for Information and related Technology) are considered.

The risk management and internal control processes at NOS shall be supported by a consistent and systematic methodology, based on international reference standards such as the *Enterprise Risk Management - Integrated Framework*, issued by COSO (Committee of Sponsoring Organisations of the Treadway Commission).

In line with this general reference methodology, the management and control of risks are achieved using the **main approaches and methods** presented below:



The approach adopted by NOS for Enterprise Risk Management (ERM), is to incorporate risk management into NOS strategic planning activities. During the preparation of annual Action and Resources Plans, as part of the Strategic Plans, the business areas consider risks that may compromise their performance and objectives and define actions to manage those risks, within the levels of acceptance intended and established by the management bodies. The plans are debated and approved by the Executive Committee in compliance with the strategies and policies defined by the Board of Directors.

The risk assessment exercises are approved by the Executive Committee and subject to final approval by the Board of Directors. They are monitored by the Statutory Independent Audit Board and by the Audit and Finance Committee, so that they can assess and express their opinion prior to final approval, within the competences that each of these bodies has in supervising the internal control and risk management system in the organisation.

As a result of the aforementioned risk assessment exercises and the prospect of changes to risks, there may be a need for adjustments to the internal control and risk management systems, to be implemented by the management bodies, by other bodies, the Audit, Risk and Compliance roles, or other areas of the organisation, as applicable.

55. Core details on the internal control and risk management systems implemented in the company in relation to the financial information reporting procedure

NOS is potentially exposed to **risks related to accounting processes and financial reporting**. Therefore, the Company ensures the quality and improvement of the most relevant processes for preparing and disclosing financial statements, in accordance with the accounting principles adopted and bearing in mind the objectives of transparency, consistency, simplicity and materiality. In this context, the Company's attitude towards financial risk management has been conservative and prudent.

The main elements of the internal control and risk management system for financial information are described in section "3.1.4. Management of Financial Information risks and controls" of the **NOS Risk Management Policy.**

The **functional responsibilities** for financial statements at the corporate level of NOS and in the Group's subsidiary companies are distributed as follows:

- **Entity Level Controls** are defined in corporate terms, are applicable to all the Group companies, and aim to establish internal control guidelines for NOS subsidiaries;
- **Process Level Controls** and **IS/IT Controls** are defined in corporate terms and applied to NOS subsidiaries, adapted to their specific characteristics, organisation and responsibility for processes;
- Given this breakdown, controls relating to the collection of the information that serves as a basis for the preparation of the financial statements are generally located in the **departments of each of the subsidiaries**; controls related to the processing, registration and accounting archive of this information are located, at corporate level, in the **Financial and Assurance Services Department**.

The internal control and risk management system associated with the financial statements includes several **key controls,** in which it is included the following:

- The financial information disclosure process is institutionalised, the criteria for preparation and disclosure have been duly approved, are fully established and are periodically reviewed;
- The use of accounting principles, explained in the **Notes to the Financial Statements**, namely in the section "**Accounting Policies**", constitutes one of the fundamental pillars of the control system;
- The controls are aggregated by the business cycles that give rise to the financial statements, and by the corresponding classes and subclasses of transactions.

For the most significant situations, the **Financial and Assurance Services Department** prepares a set of documents on the policies and procedures implemented and their compliance with the **IFRS (International Financial Reporting Standards)**, as well as addressing potential sources of risk that could materially affect accounting and financial reporting.

Among these **potential sources of risk**, one should highlight the following:

- Accounting estimates - The most significant accounting estimates are described in the Notes to the Financial Statements. Estimates were based on the best information available during the preparation of the financial statements, and on the best knowledge and experience of past and/or present events;
- Balances and transactions with related parties - The most significant balances and transactions with related parties are disclosed in the Notes to the Financial Statements. For certain transactions with related parties there are value thresholds (defined and disclosed in this Report) from which the prior opinion of the Statutory Independent Audit Board must be requested.

NOS adopts various **measures to help manage risks** and to maintain a robust internal control environment, including initiatives of the following type:

- Compliance tests - These include periodic self-assessments of the internal control system and the consequent revision of the Internal Control Manual, to ensure it is permanently updated. Corrective action is also included on control procedures considered to be non-compliant as a result of the compliance assessment work carried out by the Internal Audit and External Audit;
- Review and improvements in the design of controls - This includes actions to review control procedures and strengthen business cycles and financial flows of material relevance, in order to improve the control environment and the perception of existing (operational and financial) risks. This robustness include the creation of an aggregated view of the life cycle of the assets or associated financial flows, as well as of the corresponding processes and systems that support them.

In addition to the financial risks mentioned in the section on the main types of risk and which have an impact on the business, the Company is potentially exposed to other financial risks which may have an impact on the financial statements, such as credit risk (related to balances receivable from Customers), liquidity risk (related to sufficient assets to cover liabilities), market risk (related to exchange rate variations), interest rate risk (related to interest rate fluctuations and dependent on whether the rate is variable or fixed) and capital risk (related to financial loans and shareholder remuneration).

More specific information on financial risk management policies, as well as how the risks associated with the financial statements are managed and controlled, can be found in the **Notes to the Financial Statements**, specifically in the "**Policies and Risk Management**" section.

IV. Investor Relations

56. Department responsible for investor assistance

The Investor Relations and Sustainability Department is responsible for ensuring proper relations with shareholders, investors and analysts in full compliance with the principle of equal treatment, as well as with the financial markets in general and, in particular, with Euronext Lisbon and the CMVM.

The Investor Relations and Sustainability Department, delegated by the Executive Committee, is also responsible for implementing NOS' sustainability strategy, ensuring its day-to-day management and liaising with the various departments and business areas.

Sustainability is of strategic importance to NOS, which seeks to stand out as a benchmark of good practice among national and international peers. The Investor Relations and Sustainability Department thus seeks to actively contribute to reporting and reinforcing NOS' sustainability performance to the capital markets, not only to ensure access to sustainable financing and investment models, but also to leverage public recognition and independent ESG (Environmental, Social and Governance) assessment, thereby strengthening NOS' reputation before all stakeholders.

This Department is responsible for:

a. Publishing the integrated management report and accounts every year, as well as disclosing annual, half-yearly and quarterly information and privileged information, which shareholders and other stakeholders can access in Portuguese and English via the Company's website (www.nos.pt/ir);

b. Regularly preparing press releases, presentations and announcements on quarterly, half-yearly and annual results, as well as on any relevant facts that occur;

c. Providing clarification to the financial community in general - shareholders, investors (institutional and private) and analysts - assisting and supporting shareholders in exercising their rights;

d. Promoting regular meetings between the executive management team and the Department itself with the financial community through participation in specialised conferences, roadshows both in Portugal and in the main international financial markets, and frequent meetings with investors visiting Portugal;

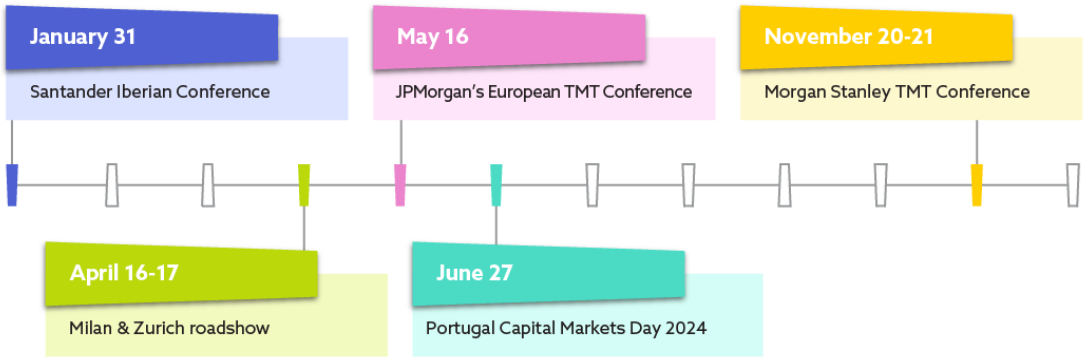
e. Coordinating the definition, implementation and management of the sustainability strategy with the various departments and business areas;

f. Monitoring the implementation of the sustainability strategy, in collaboration with the owners of the different initiatives, through an ESG Scorecard, with KPIs associated with performance and milestones achieved. This tool makes it possible to regularly record and report on the implementation of the strategy to the NOS Executive Committee and Board of Directors;

g. Organising a quarterly Sustainability Forum, with the main purpose of sharing information and experiences regarding the initiatives associated with implementing the sustainability strategy. The Forum involves members of the Executive Committee and Directors and/or representatives of the areas with the most impact on ESG strategy and performance;

h. Gathering information and supporting the Corporate Governance and Sustainability Committee in its duties of supervising corporate activity on corporate governance, rules of conduct and environmental and social sustainability.

In 2024, the main capital market events in which the Investor Relations and Sustainability Department participated were:



Requests for information can be addressed to the Investor Relations and Sustainability Department, via the following contacts:

Rua Actor António Silva, no. 9
1600-404 Lisbon (Portugal)
Tel. +(351) 21 782 47 25
Fax: +351 21 782 47 35
Email: ir@nos.pt

57. Market relations representative

The NOS market relations representative is Maria João Carrapato, Director of Investor Relations and Sustainability Department.

58. Information on the extent and response time to requests for information received during the year or pending from previous years

NOS keeps a record of all requests for information and how they are handled, and they are answered immediately or dealt with within a maximum of 24 working hours.

It should be noted that, as at 31 December 2024, there were no requests for information pending a response.

V. Website

59. Address

NOS provides all legal, financial and corporate governance information on its website, www.nos.pt.

60. Location of the information mentioned in article 171 of the Portuguese Companies Code

The information relating to article 171 of the Portuguese Companies Code [CSC] can be found in the "Legal Identification" tab of NOS' website:

https://www.nos.pt/en/institutional/investors/corporate-governance

61. Site where the articles of association and regulations on the functioning of the bodies and/or committees can be found

Company Articles of Association

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/estatutos-nos-sgps-eng-abril-2022.pdf

Regulations of the Board of Directors

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/regulamento-ca-maio2022-en.pdf

Statutory Independent Audit Board Regulations

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/Statutory-Independent-Audit-Board-Regulations.pdf

Composition, Operation and Delegation of Management Powers

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/deleg-ce-2022-en.pdf

Regulations of the Corporate Governance and Sustainability Committee

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/regulamento-cgs-s-maio2022-en.pdf

Regulations of the Audit and Finance Committee

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/regulamento-caf-maio2022-en.pdf

Regulations of the Appointments and Assessments Committee

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/regulamento-da-cna-maio2022-en.pdf

Regulations of the Ethics Committee

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/regulamento-cde-fev2022-en.pdf

Regulations on Transactions with Related Parties

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/Regulamento%20Transacoes%20com%20Partes%20Relacionadas%202022_EN.pdf

Regulations of the Remuneration Committee

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/Regulamento_Comissao_de%20Vencimentos_20230306_EN.pdf

Regulations for the Provision of Services by Statutory Auditors

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/regulamento-prestac%cc%a7a%cc%83o-servic%cc%a7os-roc-engvf.pdf

62. Site where information is made available on the identity of the members of the governing bodies, the market relations representative, the investor assistance office or equivalent structure, their duties and contact details

The identity of the members of NOS' governing bodies can be found under the tabs "Board of Directors", "Executive Committee", "Remuneration Committee", "Board of the General Shareholders' Meeting", "Statutory Independent Audit Board" and "Statutory Auditor" on the website:

https://www.nos.pt/en/institutional/investors/corporate-governance

The market relations representative, as well as the contact details of the investor assistance office or equivalent structure, duties and contact details are available at:

https://www.nos.pt/en/institutional/investors/investors-contacts

63. Site where the financial statements are made available, which must be accessible for at least 5 years, as well as the half-yearly calendar of corporate events, published at the beginning of each half-year, including, among others, general meetings of shareholders, disclosure of annual, half-yearly and, if applicable, quarterly accounts

The financial statements, as well as the calendar of corporate events, can be found on the NOS website at:

https://www.nos.pt/en/institutional/investors/results-and-presentations/results

64. Site where the notice convening the general meeting and all related preparatory and subsequent information is published

The notice for the General Shareholders' Meeting and all preparatory and subsequent information related to it is published on the website at:

https://www.nos.pt/en/institutional/investors/general-meeting-of-shareholders-2024

65. Site where the historical archive is made available with the resolutions passed at the company's general meetings of shareholders, the share capital represented and the voting results, with reference to the previous 3 years

The historical archive with resolutions passed at the Company's General Meetings of Shareholders, the share capital represented and the voting results are available on NOS' website at:

https://www.nos.pt/en/institutional/investors/general-meeting-of-shareholders-2024/notice-to-convene

D. Remunerations

I. Competence for determination

66. Respective details

The NOS Remuneration Committee is responsible, in particular, for setting the remuneration of the members of the Board of the General Shareholders' Meeting, the Board of Directors (including the Executive Committee) and the Statutory Independent Audit Board, the members of the latter two bodies being NOS managers (*dirigentes*).

II. Remuneration Committee

67. Composition of the Remuneration Committee

The Remuneration Committee consists of 2 members who are independent from the Company's management and are appointed at the General Shareholders' Meeting.

This Committee monitors and evaluates the performance of the directors on an ongoing basis, with the support of the Appointments and Assessments Committee, verifying the extent to which the proposed objectives have been achieved, and meets whenever necessary.

As of 31 December 2024, the Remuneration Committee had the following composition:

 João Gunther Amaral	**Chairman of the Remuneration Committee**
 Mário Leite da Silva	**Member of the Remuneration Committee**

In 2024, the Committee met once, deciding on the achievement of KPIs by the Company with reference to 2023, the definition of KPIs and respective target values for 2024, the variable remuneration to be considered for the executive members of the Board of Directors with reference to the performance of 2023, as well as the total remuneration of the executive members of the Board of Directors. Minutes of said meeting were drawn up.

During the course of 2024, the Remuneration Committee did not hire any consultancy services through the Company itself or others in a controlling or group relationship with it to support the fulfilment of its mission, although it may do so freely whenever it deems it necessary or convenient for the performance of its duties, given that the Company provides the members of the Remuneration Committee with permanent access, at the Company's expense, to external consultants specialised in various areas, whenever the Committee needs them. Such external consultants shall be chosen by the Remuneration Committee, which shall ensure that such services are provided independently, by consultants who do not provide other services to the Company or to other Group companies.

The composition, operation and powers of the Remuneration Committee are defined in its Regulations, approved on 6 March 2023, which are available at:

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/Regulamento_Comissao_de%20Vencimentos_20230306_EN.pdf

68. Knowledge and experience of members

The members of the Remuneration Committee have extensive and recognised experience in business management, particularly in listed companies, and have the necessary knowledge to handle and decide on all matters within their remit, including the remuneration policy.

The Annex to this Report describes the positions currently held by the members, as well as their academic qualifications and professional activities.

III. Remunerations Structure

69. Description of the remuneration policy

At the NOS General Shareholders' Meeting of 21 April 2021, at which the Remuneration Committee was present in order to provide information or clarification to the shareholders, the proposal presented by the latter on the remuneration policy for the management and supervisory bodies of NOS was approved by a majority of 97.20% of the votes cast by the shareholders present, which can be consulted at:

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/notices-general-meeting/2021/Proposta_Ponto_4_ENG_2021.pdf

At the NOS General Shareholders' Meeting of 5 April 2023, at which the Remuneration Committee was also present in order to provide information or clarification to shareholders, a proposal to amend the remuneration policy for NOS management and supervisory bodies was approved by a majority of 86.3267% of the votes cast by the shareholders present, which can be found at:

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/general-meeting-2023/Item4-GM23G.pdf

NOS' remuneration policy is based on the following principles:

- Remuneration of the corporate bodies takes into consideration, amongst other factors, the professional profile and curriculum vitae of the member, the nature of the duties to be performed and the competencies of the corporate body in question and of the member themselves, as well as the individual performance and the performance of the Company's business;
- Remuneration of the corporate bodies shall be appropriate to the structure and financial conditions of the Company, its size and the complexity of the challenges it faces;
- Remuneration of the members of the corporate bodies shall follow a model composed of different elements, namely a fixed component common to the members of all the bodies, and a variable component applicable only to executive directors;
- Remuneration of the corporate bodies, in particular of the executive directors, shall take into account the employment and remuneration conditions of full-time (or equivalent) employees in the Company; the intention is to ensure consistency and equity in terms of remuneration with reference to the weight of the respective qualifications, responsibilities, experience and specificity of the risk associated with the function;
- Remuneration of the executive directors respects a balance between the fixed and the variable components in order to ensure their alignment with the long-term corporate objectives;

- The variable remuneration shall have maximum limits and include a component aimed at guiding and rewarding directors for their individual performance and the performance of the Company, on the one hand, and on the other a long-term component aimed at reinforcing the connection between executive directors and the Company by aligning their interests with those of its shareholders and increasing awareness of the importance of their performance for the overall success of the Company;
- No provision is made for any type of instrument aimed at mitigating the risk inherent in the variability of the variable remuneration of the executive members of the Board of Directors;
- Alignment with market recommendations and best practices, namely through comparison with the global market and practices of comparable companies;
- Clarity and transparency, namely through publication on the Company's website.

Pursuant to the NOS remuneration policy:

- The non-executive members of the Board of Directors, since they have no responsibility for operationalisation of the strategies defined, only receive fixed component of remuneration;
- The members of the Statutory Independent Audit Board only receive fixed component of remuneration;
- The Statutory Auditor is remunerated in accordance with the contractually established conditions, pursuant to the law;
- The total remuneration of executive directors consists of a fixed component, which acts as "base" remuneration, and a variable component (profit-sharing and/or the award of shares).

Profit-sharing can be proposed to shareholders by the Board of Directors. After assessing the total amount to be distributed, the amount to be received by each member will also depend on alignment with results.

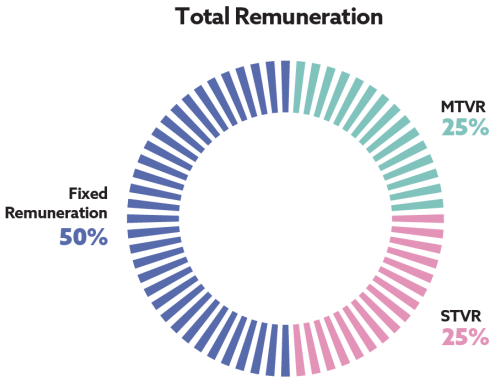
The Share Allocation Plan (NOS Plan), applicable to executive directors, seeks to (i) ensure that individual interests are aligned with corporate objectives and the interests of NOS shareholders, rewarding the achievement of objectives, which presuppose sustained value creation, as well as (ii) strengthening loyalty mechanisms.

NOS' remuneration policy does not provide for adjustment mechanisms (clawback or *malus*).

In the 2024 financial year, there was full compliance with the NOS remuneration policy in force, and there were no departures or derogations therefrom.

70. Remuneration structure and alignment of interests

In proportional terms, the annual remuneration of executive directors in 2024 was the following:



STVR refers to Short-Term Variable Remuneration and **MTVR** refers to Medium-Term Variable Remuneration

In compliance with the principles of NOS' remuneration policy, the total variable remuneration of executive directors is determined based on a qualifying indicator of individual performance, with a weight of 30%, and on NOS' performance, measured through previously defined (collective) business indicators - Key Performance Indicators (KPIs) - with a weight of 70%, which in 2024 corresponded to the following:

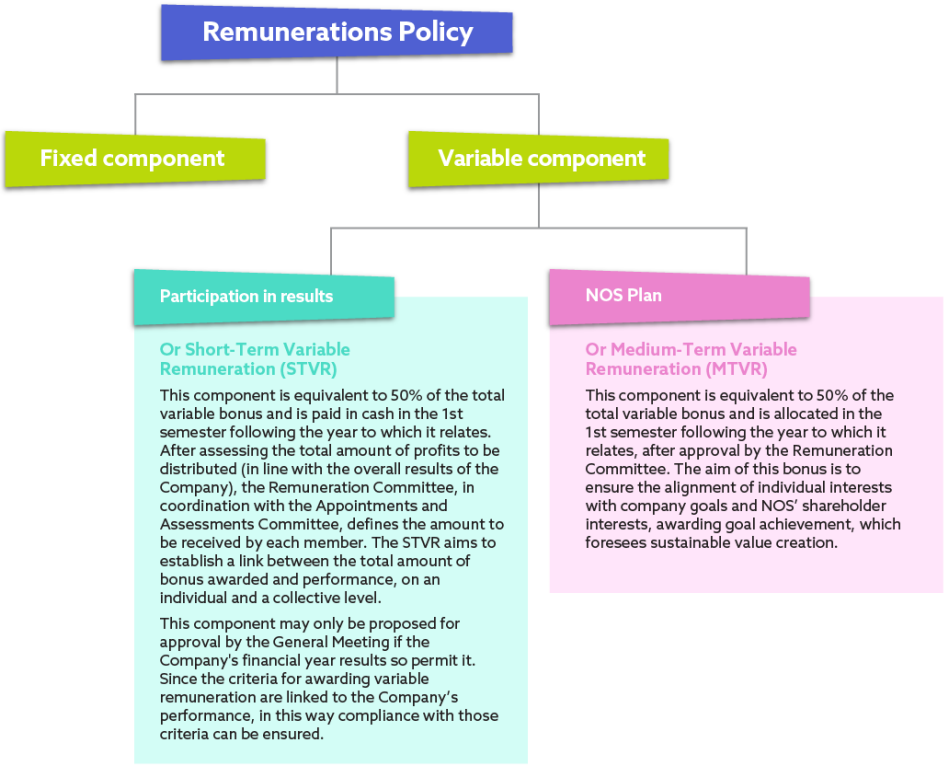
1. EBITDA;
2. Consolidated operational Free Cash Flow;
3. Consolidated business volume; and
4. Net Promoter Score (NPS).

The structure of NOS' remuneration policy is therefore based on a model in which initiative and competence are considered essential foundations for good performance and which must be aligned with the medium and long-term interests of the company, its strategy, the mechanisms for defending the interests of its stakeholders, with a view to its sustainability. It also discourages risky behaviour, insofar as this is linked to performance evaluation.

In addition, the implementation and execution of the Strategic Plan approved by the Board of Directors, including objectives related to ESG in its ethical, social, environmental and governance dimensions, strategic factors considered inseparable from the development of the organisation and the business, is incorporated into the assessment of executive directors.

71. Variable component and performance

The variable remuneration of executive directors consists of:



The remuneration allocated in 2024, through the NOS Plan, was deferred over 3 years, with the transformation of the rights allocated under the NOS Plan in 2024 being conditional on the Company achieving positive results, which presupposes fulfilment of the following condition:

The consolidated net position in the year *n+3*, excluding any extraordinary movements occurring after the end of the year *n*, and deducted, for each financial year, of an amount corresponding to a payout of 40% on the net profit calculated in the consolidated accounts for each year of the deferral period (regardless of the effective payout) must be greater than that calculated at the end of the financial year *n*. Extraordinary movements in the period between the year *n* and *n+3* include cash inflows from a capital increase, the purchase or sale of own shares, extraordinary dividend payments, annual payout other than 40% of the consolidated profit for the respective business year or other movements which, while affecting the net position, do not derive from the Company's operating results.

The net position of the year *n+3* should be determined based on the accounting rules used in year *n*, to ensure comparability.

The value of the variable components (including the NOS Plan), at the time of the allocation decision is made by the Remuneration Committee, has no minimum limit and is limited to a maximum value of 120% with reference to the fixed remuneration.

There are no contracts guaranteeing minimums for variable remuneration, independent of the Company's performance, or contracts seeking to mitigate the risk inherent in variable remuneration.

72. Deferred payment of variable remuneration

See paragraph 71 above.

73. Allocation of variable remuneration in shares

See paragraph 71 above.

There are no hedging or risk transfer contracts for a pre-defined amount of the total annual remuneration of executive directors. Therefore, the risk underlying the variability of remuneration is not mitigated.

74. Allocation of variable remuneration in options

There is currently no option-based remuneration for directors.

75. Annual bonuses and other non-cash benefits

No other non-pecuniary benefits were granted in 2024, with the exception of the granting of health insurance and life and personal accident insurance to executive directors, in line with the Group's general policy applied to other employees and which terms and values fall in line with market practices.

76. Supplementary pension or retirement schemes

There are no supplementary pension or early retirement schemes for directors.

IV. Remuneration Disclosure

77. Remuneration paid to directors

The remuneration earned by the directors during the 2024 financial year was as follows:

Name	Fixed Remuneration (€)	Profit-sharing (€)	Remuneration Total (€)
Executive Directors			
Miguel Nuno Santos Almeida (CEO)	675,000	388,304	1 063 304
José Alexandre Koch Ferreira (CFO) [1]	375,000	-	375,000
Jorge Filipe Pinto Sequeira dos Santos Graça	340,000	192,140	532,140
Luís Moutinho Nascimento	350,000	197,775	547,775
Manuel António Portugal Ramalho Eanes	390,000	220,315	610,315
Daniel Lopes Beato	325,000	155,513	480,513
Filipa de Sousa Taveira da Gama Santos Carvalho	300,000	141,425	441,425
Non-Executive Directors			
Ângelo Gabriel Ribeirinho Santos Paupério (Chairman of the Board of Directors)	225,000	-	225,000
António Bernardo Aranha da Gama Lobo Xavier	80,000	-	80,000
Catarina Eufémia Amorim da Luz Tavira Van-Dúnem	65,000	-	65,000
João Pedro Magalhães da Silva Torres Dolores	92,500	-	92,500
Maria Cláudia Teixeira de Azevedo	72,500	-	72,500
Ana Rita Ferreira Rodrigues	92,500	-	92,500
Cristina Maria de Jesus Marques	67,533	-	67,533
Eduardo António Salvador Verde Rodrigues Pinho	65,000	-	65,000

[1] José Alexandre Koch Ferreira began serving his term of office on 01/01/2024.

By way of MTVR [1], under the NOS Plan, the number of shares allocated to each executive director in 2024 is detailed as follows:

Name	No. of Shares
Miguel Nuno Santos Almeida (CEO)	123,483
José Alexandre Koch Ferreira (CFO)	-
Jorge Filipe Pinto Sequeira dos Santos Graça	61,101
Luís Moutinho Nascimento	62,893
Manuel António Portugal Ramalho Eanes	70,061
Daniel Lopes Beato	49,454
Filipa de Sousa Taveira da Gama Santos Carvalho	44,974

(1) The number of shares allocated was calculated based on the average closing price in the 15 sessions prior to 28 March 2024 and approved by the Remuneration Committee.

In 2024, the total variable remuneration component of executive directors was determined on the basis of the achievement of (collective) business indicators, the weight of which is 70%, as follows:

KPI (collective)	Relative weight (%)
EBITDA	17.50
Consolidated Operational Free Cash Flow	17.50
Consolidated business volume	17.50
Net Promoter Score (NPS)	17.50

In addition, the achievement of individual qualitative performance indicators was considered, which weighed 30% in the determination of total variable remuneration.

i) Annual variation in directors' remuneration, Company's performance and average employee remuneration

The variation in the annual remuneration of directors, the Company's performance and the average remuneration of employees, in full-time or equivalent terms in the Company, excluding the management and supervisory bodies, for the 2020-2024 period, is as follows:

Annual Variation (%) Name	2020 vs 2019	2021 vs 2020	2022 vs 2021	2023 vs 2022	2024 vs 2023
Miguel Nuno Santos Almeida (CEO)	1.82%	-0.67%	8.22%	3.87%	0.16%
José Alexandre Koch Ferreira (CFO) [1]	N/A	N/A	N/A	N/A	N/A
Jorge Filipe Pinto Sequeira dos Santos Graça	3.78%	-0.67%	7.75%	4.08%	0.42%
Manuel António Portugal Ramalho Eanes	2.96%	-0.67%	6.95%	3.70%	0.42%
Luís Moutinho Nascimento	7.16%	-0.67%	4.38%	2.42%	0.42%
Daniel Lopes Beato [2]	N/A	N/A	N/A	35.52%	19.36%
Filipa de Sousa Taveira da Gama Santos Carvalho [2]	N/A	N/A	N/A	25.58%	21.96%

[1] The term of office of José Koch Ferreira began on 01/01/2024.
[2] The term of office of Daniel Beato and Filipa Carvalho began on 15/01/2021.

ii) Annual variation in the remuneration of non-executive directors

Annual Variation (%) Name	2020 vs 2019	2021 vs 2020	2022 vs 2021	2023 vs 2022	2024 vs 2023
Ângelo Gabriel Ribeirinho Santos Paupério (Chairman of the Board of Directors) (1)	67.14%	19.66%	50.00%	0.00%	0.00%
Ana Rita Ferreira Rodrigues (2)	N/A	N/A	16.83%	0.00%	0.00%
António Domingues (3) (4)	29.22%	12.56%	N/A	N/A	N/A
António Bernardo Aranha da Gama Lobo Xavier	10.71%	5.38%	14.29%	0.00%	0.00%
Catarina Eufémia Amorim da Luz Tavira Van-Dúnem	11.10%	6.33%	8.33%	0.00%	0.00%
Cristina Maria de Jesus Marques (2)	N/A	N/A	5.60%	10.98%	-20.55%
Joaquim Francisco Alves Ferreira de Oliveira (4)	11.10%	6.33%	N/A	N/A	N/A
João Pedro Magalhães da Silva Torres Dolores	23.36%	16.70%	16.83%	0.00%	0.00%
José Carvalho de Freitas (2) (4)	N/A	N/A	N/A	N/A	N/A
Maria Cláudia Teixeira de Azevedo	11.10%	6.33%	20.83%	0.00%	0.00%
Eduardo António Salvador Verde Rodrigues Pinho (5)	N/A	N/A	N/A	43.52%	0.00%

(1) Appointed Chairman of the Board of Directors on 27/01/2020.
(2) Term of office began on 23/03/2020.
(3) Term of office began on 01/03/2017.
(4) Term of office ended on 21/04/2022.
(5) Term of office began on 21/04/2022.

The following table shows the annual percentage change in NOS' performance targets (on a consolidated basis) between 2020 and 2024:

Company performance (%)	2020 vs 2019	2021 vs 2020	2022 vs 2021	2023 vs 2022	2024 vs 2023
EBITDA	-5.7%	2.5%	5.4%	10.1%	7,1%
Revenues	-6.2%	4.6%	6.3%	5.0%	6,2%

The table below shows information on the changes in the average remuneration of NOS employees from 2020 to 2024:

Average remuneration of full-time employees (%)	2020 vs 2019	2021 vs 2020	2022 vs 2021	2023 vs 2022	2024 vs 2023
	-0.2%	0.5%	2.5%	4.4%	3.3%

Average employee remuneration calculated on the basis of the objective average remuneration of full-time employees in the company on 31 December of each year, excluding directors, trainees and workers in the cinema area, of all companies with more than 50% control by the Company.

The number of rights allocated (referred to below as "Allocated Shares") and shares delivered (referred to below as "Delivered Shares"), due to the fulfilment of the condition described in paragraph 71 above, to executive directors is detailed as follows:

Name (Position)	Conditions of Share Plan					Information on the Financial Year Reported	
	Plan	Period of the Plan	Date Allocated	Maturity Date	End of Retention Period	No. of Shares Allocated [2]	No. of Shares Delivered [1][3][6]
Miguel Nuno Santos Almeida (CEO)	2021/2024	01/04/2021 - 31/03/2024	01/04/2021	31/03/2024	31/03/2024	116,503	44,487
	2022/2025	01/04/2022 - 31/03/2025	01/04/2022	31/03/2025	31/03/2025	104,379	-
	2023/2026	01/04/2023 - 31/03/2026	01/04/2023	31/03/2026	31/03/2026	101,852	-
	2024/2027	01/04/2024 - 31/03/2027	01/04/2024	31/03/2027	31/03/2027	123,483	-
José Alexandre Koch Ferreira (CFO) [5]	-	-	-	-	-	-	-
	-	-	-	-	-	-	-
	-	-	-	-	-	-	-
	-	-	-	-	-	-	-
Jorge Filipe Pinto Sequeira dos Santos Graça	2021/2024	01/04/2021 - 31/03/2024	01/04/2021	31/03/2024	31/03/2024	58,352	22,282
	2022/2025	01/04/2022 - 31/03/2025	01/04/2022	31/03/2025	31/03/2025	50,862	-
	2023/2026	01/04/2023 - 31/03/2026	01/04/2023	31/03/2026	31/03/2026	50,031	
	2024/2027	01/04/2024 - 31/03/2027	01/04/2024	31/03/2027	31/03/2027	61,101	-
Luís Moutinho do Nascimento	2021/2024	01/04/2021 - 31/03/2024	01/04/2021	31/03/2024	31/03/2024	63,004	24,058
	2022/2025	01/04/2022 - 31/03/2025	01/04/2022	31/03/2025	31/03/2025	54,919	-
	2023/2026	01/04/2023 - 31/03/2026	01/04/2023	31/03/2026	31/03/2026	51,499	-
	2024/2027	01/04/2024 - 31/03/2027	01/04/2024	31/03/2027	31/03/2027	62,893	-
Manuel António Portugal Ramalho Eanes	2021/2024	01/04/2021 - 31/03/2024	01/04/2021	31/03/2024	31/03/2024	67,657	25,835
	2022/2025	01/04/2022 - 31/03/2025	01/04/2022	31/03/2025	31/03/2025	58,974	-
	2023/2026	01/04/2023 - 31/03/2026	01/04/2023	31/03/2026	31/03/2026	57,368	
	2024/2027	01/04/2024 - 31/03/2027	01/04/2024	31/03/2027	31/03/2027	70,061	-
Daniel Lopes Beato [4]	2021/2024	01/04/2021 - 31/03/2024	01/04/2021	31/03/2024	31/03/2024	12,507	4,776
	2022/2025	01/04/2022 - 31/03/2025	01/04/2022	31/03/2025	31/03/2025	26,894	-
	2023/2026	01/04/2023 - 31/03/2026	01/04/2023	31/03/2026	31/03/2026	33,603	
	2024/2027	01/04/2024 - 31/03/2027	01/04/2024	31/03/2027	31/03/2027	49,454	-
Filipa de Sousa Taveira da Gama Santos Carvalho [4]	2021/2024	01/04/2021 - 31/03/2024	01/04/2021	31/03/2024	31/03/2024	13,613	5,198
	2022/2025	01/04/2022 - 31/03/2025	01/04/2022	31/03/2025	31/03/2025	26,528	-
	2023/2026	01/04/2023 - 31/03/2026	01/04/2023	31/03/2026	31/03/2026	29,490	
	2024/2027	01/04/2024 - 31/03/2027	01/04/2024	31/03/2027	31/03/2027	44,974	-

[1] The number of Shares Delivered corresponds to the number of Shares Allocated, adjusted for dividends paid, each year.
[2] The calculation of the Shares Allocated (i.e. the rights to acquire shares under the NOS Plan) is based on the weighted average closing price of the shares in the 15 sessions preceding the business day before the start of the Plan.
[3] Purchase of shares at a 90% discount.
[4] The term of office of Daniel Beato and Filipa Carvalho began on 15/01/2021.
(5) The term of office of José Koch Ferreira began on 01/01/2024. Due to the fact that the term of office began in 2024, no share plan has been allocated yet.
(6) No. of Shares Delivered in the 2021/2024 Plan correspond to 30% of the Plan. The remaining 70% was settled in cash.

78. Amounts paid by other NOS Group companies

Executive directors of NOS who also hold positions at other NOS Group companies receive no additional remuneration or amounts of any kind.

79. Profit-sharing or bonus payment

See paragraphs 71 and 77 above.

80. Compensation to former executive directors

With the exception of the amount relating to compensation to a former executive director for the non-compete obligation, under the conditions reported in the Remuneration Report for 2023 (paragraph 80), no other charges or compensation were paid to former directors in connection with the termination of their duties.

81. Remuneration paid to members of the supervisory body

The remuneration of the members of the Statutory Independent Audit Board during the 2024 financial year was as follows:

Name (Position)	Fixed Remuneration (€)	Short-term Variable Rem. (€)	Total Remuneration (€)
José Pereira Alves (Chairman)	47,500	-	47,500
Paulo Cardoso Correia da Mota Pinto (Member)	30,000	-	30,000
Patrícia Andrea Bastos Teixeira Lopes Couto Viana (Member)	30,000	-	30,000

The variation in the total remuneration of the members of the Statutory Independent Audit Board for the period 2020-2024 is as follows:

Annual Variation (%) Name	2020 vs 2019	2021 vs 2020	2022 vs 2021	2023 vs 2022	2024 vs 2023
José Pereira Alves [1]	N/A	N/A	5.6%	0.0%	0.0%
Paulo Cardoso Correia da Mota Pinto [2]	-26.0%	0.0%	0.0%	0.0%	0.0%
Patrícia Andrea Bastos Teixeira Lopes Couto Viana	0.0%	0.0%	0.0%	0.0%	0.0%

[1] The term of office of José Alves began on 08/05/2019.
[2] Paulo Mota Pinto ceased to be Chairman of the Statutory Independent Audit Board and became a Member on 08/05/2019.

No non-pecuniary benefits were attributed to members of the Statutory Independent Audit Board in 2024. The members of the Statutory Supervisory Board who also hold positions at other NOS Group companies receive no additional remuneration or amounts of any kind.

In addition, as the members of the Statutory Independent Audit Board did not leave office during the financial year, no charges or compensation were paid in connection with the termination of their duties.

82. Remuneration of the Board of the General Shareholders' Meeting

The remuneration of the members of the Board of the General Shareholders' Meeting during the 2024 financial year was as follows:

Name (Position)	Fixed Remuneration (€)	Short-term Variable Rem. (€)	Total Remuneration (€)
António Agostinho Bastos Teixeira da Conceição Guedes (Chairman of the Board of the General Shareholders' Meeting)	18,000	-	18,000
Maria Daniela Farto Baptista Passos (Secretary of the Board of the General Shareholders' Meeting)	500	-	5,000

In addition, as the members of the Board of the General Shareholders' Meeting did not leave office during the year, no charges or compensation were paid in connection with the termination of their duties.

V. Agreements with remuneration implications

83. Restraints on compensation for unfair dismissal

In the event of dismissal without just cause, NOS directors are entitled to compensation for damages pursuant to the law.

The NOS remuneration policy does not contemplate the signing of contracts with members of the management or supervisory bodies that provide for the payment of indemnity or compensation in the event of the termination of the term of office before its expiry in an amount that exceeds that permitted by law, with the exception of the amounts established by law in the event of dismissal without just cause and any agreements with members of the management bodies, pursuant to and with the limits provided for in NOS remuneration policy for the management and supervisory bodies in force.

84. Compensation in the event of resignation, unfair dismissal or termination due to change of control (directors and managers)

There is no foreseen specific compensation for resignation, unfair dismissal or termination of employment relationship due to a change of control of the Company, other than those applicable by law.

VI. Share Allocation Plans

85. Plans and targets

The NOS Share Allocation Plan has the following objectives:

• The loyalty of the employees of the various companies constituting the NOS Group;

• Encouraging employees' creativity and productivity to promote business results;

• Creating favourable recruitment conditions for senior officers and high strategic value workers;

• Aligning employee interests with business goals and NOS shareholder interests by rewarding performance in terms of creating value for NOS shareholders, as reflected by NOS' stock price.

This Plan is applicable to employees in certain organisational groups, including executive directors, and is one of the pillars for making NOS a benchmark company in terms of professional and personal development and stimulating the development and mobilisation of employees around a common project.

NOS Plan Regulations, containing all the information necessary for the correct assessment of the Plan, are available for consultation on the Company's website at:

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/notices-general-meeting/2021/Proposta_Ponto_4_ENG_2021.pdf

86. Characteristics of NOS Plan

In accordance with the NOS Plan, the Executive Committee is responsible for selecting the beneficiary employees and deciding on a case-by-case basis on the allocation of shares to eligible employees. As far as the members of the Executive Board are concerned, this competence belongs to the Remuneration Committee.

The allocation of shares to the respective beneficiaries is entirely dependent on collective and individual performance criteria.

The number of shares to be allocated is established on the basis of values set by reference to percentages of the remuneration earned by the beneficiaries, taking into account the assessment of NOS' annual objectives, as well as the assessment of individual performance. The concrete number of shares to be awarded will therefore be the number resulting from dividing the value awarded by the average closing price, weighted by the respective volume of the shares in the 15 sessions before the reference date. This is unless the Executive Committee or Remuneration Committee, in the case of Executive Committee's members, considers at its sole discretion other criteria that are deemed to be more appropriate. The shares were allocated with the possibility of buying them at a discount of up to 90%.

These shares, or the equivalent amount in cash, are delivered after a deferral period of 3 years from the date of allocation. However, if dividends are distributed and the nominal value of the shares or the share capital is changed through financial transactions during the deferral period, the initial number of shares under the NOS Plan will be changed to reflect the effects of the changes described above, so that the Plan is aligned with the total return achieved.

For the executive members of the Board, the conditions of positive performance, as described in paragraph 71 above, must additionally be met for their respective appointment.

On 31 December 2024, the plans allowing for the delivery of shares were as follows:

NOS Plan	Number of Shares
2022 Plan	1 242 619
2023 Plan	1 112 875
2024 Plan	1 257 476

During the financial year ended 31 December 2024, the movements under the NOS Plan are detailed as follows:

	NOS Plan 2021	NOS Plan 2022	NOS Plan 2023	NOS Plan 2024	Total
Balance as at 31 December 2023	**1 426 069**	**1 164 196**	**1 038 600**	**-**	**3 628 865**
Exercise movements:					
Allocated	-	-	-	1 167 302	1 167 302
Vested	(1 059 516)	(7 976)	(3 536)	(1 175)	(1 072 203)
Cancelled/Extinguished/Corrected [1]	(366 553)	86,399	77,811	91,349	(110 994)
Balance as at 31 December 2024	**-**	**1 242 619**	**1 112 875**	**1 257 476**	**3 612 970**

[1] Predominantly includes corrections made according to the dividend paid, shares referring to exceptional cash-settled plans, and shares relating to termination of relationships with employees, not benefiting from the vesting of shares.

87. Stock options plans for employees

There is currently no remuneration in favour of employees through the allocation of options. The NOS Plan applicable to employees in certain organisational groups (including executive directors) only allows for the allocation of shares.

88. Control of employees' participation in capital

The voting rights attached to shares allocated to employees who are beneficiaries of the NOS Plan can only be exercised by them after the respective vesting of the shares.

E. Transactions with Related Parties

I. Control mechanisms and procedures

89. Mechanisms implemented by the company to control transactions with related parties

NOS has established mechanisms and procedures to control the Company's transactions with shareholders with qualified holdings or with entities in any relationship with them pursuant to article 20 of the Portuguese Securities Code.

Under the terms of article 3(3.1)(o) of the Delegation of Management Powers by the Board of Directors to the Executive Committee, the conclusion of any transactions between the Company and shareholders with a qualified holding equal to or greater than 2% of the voting rights and/or entities with which they are in any relationship pursuant to article 20 of the CVM were not delegated. These transactions do not exceed the individual amount of 75,000 euros or the annual aggregate amount per supplier of 150,000 euros (subject to the transactions having been approved in general terms or within the guidelines of the Board of Directors).

In turn, article 2(2.9)(g) of the Delegation of Powers states that the Chairman of the Executive Committee ensures that the Board of Directors is informed, on a quarterly basis, of transactions that, within the scope of the delegation of powers, have been entered into between the Company and Related Parties, when they exceed the individual amount of 10,000 euros.

The Audit and Finance Committee also analyses these matters, and article 3(j) of its Regulations states that it has the power, In particular, to analyse and issue a prior opinion on transactions between the Company and Related Parties.

In addition, under the terms of its Regulations, the Statutory Independent Audit Board is responsible for issuing a prior opinion on significant business activities with Related Parties.

On 4 November 2020, the Board of Directors approved, with the favourable opinion of the Statutory Independent Audit Board, new Regulations on Transactions with Related Parties, which establish, in particular, the procedures and criteria necessary to define the relevant level of significance of business with shareholders with a qualified holding - or with Related Parties - with the completion of business of significant relevance being dependent on the prior opinion of the supervisory body, in strict compliance with current legal precepts.

The Regulation on Transactions with Related Parties can be consulted at:

https://www.nos.pt/content/dam/nos/institucional/investidores/investidores_en/governo-da-sociedade/Regulamento%20Transacoes%20com%20Partes%20Relacionadas%202022_EN.pdf

90. Details of transactions that were subject to control in the reference year

In the course of 2024, NOS did not carry out any business or operation that was significant in economic terms for any of the parties involved with members of the management or supervisory bodies or companies that are in a controlling or group relationship, which were not carried out under normal market conditions for similar operations and that were not part of the Company's current activity.

Without prejudice, the Statutory Independent Audit Board issued a favourable prior opinion on the transaction, concerning the partnership between NOS Comunicações, S.A. and the related party Worten - Equipamentos para o Lar, S.A. within the alarms and private security business, with the purpose of creating a new range of products to be made available exclusively through Worten's sales channels, and concluded that there was compliance with the principle of full competition.

91. Description of the procedures and criteria applicable to supervisory body for the purposes of prior assessment of business to be carried out between the company and holders of qualified holdings or entities in any relationship with them, pursuant to article 20 of the Portuguese Securities Code

The Regulation on Transactions with Related Parties establishes the internal procedures for controlling transactions with holders of qualified holdings, considered appropriate for the transparency of the decision-making process, defining the terms of intervention of the Statutory Independent Audit Board in this process.

Therefore, subject to other obligations under these Regulations, by the end of the month following the end of each quarter, the Executive Committee shall inform the Statutory Independent Audit Board of all transactions carried out in the previous quarter with each holder of a qualified holding and/or related entity.

Transactions with qualified shareholders and/or related parties require a prior opinion from the Statutory Independent Audit Board in the following cases: (i) transactions with a value per transaction exceeding a particular level set forth in the Regulations and described in the table below; (ii) transactions with a significant impact on the activities of NOS and/or its subsidiaries due to their nature or strategic importance, regardless of their value; (iii) transactions made, exceptionally, outside normal market conditions, regardless of their value and (iv) transactions carried out exceptionally, outside of current activities, regardless of the respective amount.

Types and values of the transactions to be considered for the purposes of item (i) above:

Transactions – Sales, Provision of Services, Purchases and Services obtained, except for the renewal of contracts in progress	Exceeding 1,000,000 euros
Loans and other financing received and granted, except for current cash/operation management up to 180 days	Exceeding 10,000,000 euros
Financial investments	Exceeding 10,000,000 euros

The prior opinion of the Statutory Independent Audit Board required for the transactions referred to in items (i) and (ii) above will not be necessary in the case of: (i) interest and/or exchange rate hedging transactions through trading rooms or auctions and (ii) applications or financial investments through trading rooms or auctions.

For the purposes of assessing the transaction in question and issuing an opinion by the Statutory Independent Audit Board, the Executive Board must provide the Statutory Independent Audit Board with all the necessary information and a substantiated justification thereof.

The assessment to authorise and issue a prior opinion applicable to transactions with qualified shareholders and/or related parties should take into account, among other relevant aspects, the principle of equal treatment of shareholders and other stakeholders, the interest of the Company as well as the impact, materiality, nature and justification for each transaction.

II. Business elements

92. Indication of where in the financial statements' information on related party transactions is available in accordance with IAS 24

The relevant transactions with Related Parties carried out up to 31 December 2024 are described in note 46 to the Financial Statements, which are part of the accounting documents, available at the Company's registered office and on the website at:

https://www.nos.pt/en/institutional/investors/results-and-presentations/results

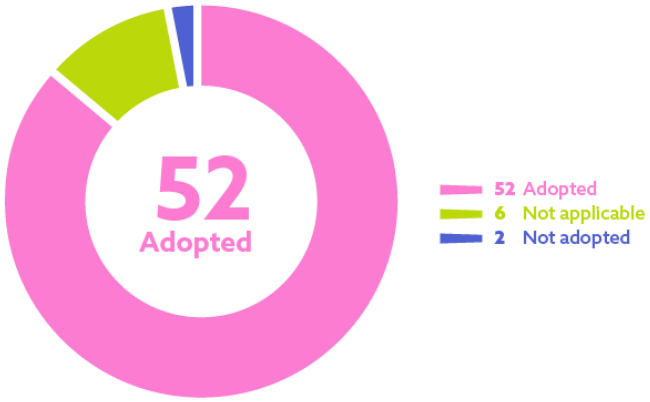
Part 2
Corporate governance assessment

1. Details of the Corporate Governance Code Implemented

In accordance with article 2 of CMVM Regulation no. 4/2013, NOS adopts the Recommendations contained in the Corporate Governance Code of the Portuguese Institute of Corporate Governance (IPCG), approved in 2018 and revised in 2023, which is available on the website of this entity, www.cgov.pt.

2. Analysis of Compliance with the Implemented Corporate Governance Code

The following table presents: i) the IPGC Recommendations on Corporate Governance; ii) the corresponding level of observance by NOS, as at 31 December 2024 and justification of recommendations not applicable or not adopted; and, also iii) reference to the Chapters of this Corporate Governance Report that describe the measures taken by the Company to comply with the aforementioned Recommendations.



Analysis of Compliance with the Corporate Governance Report 2024

	CORPORATE GOVERNANCE CODE	ASSESSMENT	CGC REFERENCE/COMMENTS
I	**COMPANY'S RELATIONSHIP WITH SHAREHOLDERS, INTERESTED PARTIES AND THE COMMUNITY AT LARGE**		
Principles: ***I.A. In their organisation, operation and in the definition of their strategy, companies shall contribute to the pursuit of the Sustainable Development Goals defined within the framework of the United Nations Organisation, in terms that are appropriate to the nature of their activity and their size.*** ***I.B. The company periodically identifies, measures and seeks to prevent negative effects related to the environmental and social impact of the operation of its activity, in terms that are appropriate to the nature and size of the company.*** ***I.C. In its decision-making processes, the management body considers the interests of shareholders and other investors, employees, suppliers and other stakeholders in the activity of the company.***			
I.1.	The company specifies in what terms its strategy seeks to ensure the fulfilment of its long-term objectives and what are the main contributions resulting herefrom for the community at large.	**Adopted**	**Item 21**
I.2.	The company identifies the main policies and measures adopted with regard to the fulfilment of its environmental and social objectives.	**Adopted**	**Item 21**
II	**COMPOSITION AND FUNCTIONING OF THE CORPORATE BODIES**		
II.1. Information			
Principle: ***II.1.A. Companies and, in particular, their Directors treat shareholders and other investors in an equitable manner, namely by ensuring mechanisms and procedures for the adequate treatment and disclosure of information.***			
II.1.1	The company establishes mechanisms to adequately and rigorously ensure the timely circulation or disclosure of the information required to its bodies, the company secretary, shareholders, investors, f inancial analysts, other stakeholders and the market at large.	**Adopted**	**Items 15, 22, 28, 29, 34, 56 to 65**
II.2. Diversity in the composition and functioning of the corporate bodies			
Principles: ***II.2.A. Companies have adequate and transparent decision-making structures, ensuring maximum efficiency in the functioning of their bodies and committees.*** ***II.2.B. Companies ensure diversity in the composition of their management and supervisory bodies and the adoption of individual merit criteria in the respective appointment processes, which shall be the exclusive responsibility of shareholders.*** ***II.2.C. Companies ensure that the performance of their bodies and committees is duly recorded, namely in minutes of meetings, that allow for knowing not only the sense of the decisions taken but also their grounds and the opinions expressed by their members.***			
II.2.1.	Companies establish, previously and abstractly, criteria and requirements regarding the profile of the members of the corporate bodies that are adequate to the function to be performed, considering, notably, individual attributes (such as competence, independence, integrity, availability and experience), and diversity requirements (with particular attention to equality between men and women), that may contribute to the improvement of the performance of the body and of the balance in its composition.	**Adopted**	**Items 19, 29 and 33**
II.2.2.	The management and supervisory bodies and their internal committees are governed by regulations – notably regarding the exercise of their powers, chairmanship, the frequency of meetings, operation and the duties framework of their members – fully disclosed on the website of the company, whereby minutes of the respective meetings shall be drawn up.	**Adopted**	**Items 22, 27, 29, 34 and 67**

II.2.3.	The composition and number of meetings for each year of the management and supervisory bodies and of their internal committees are disclosed on the website of the company.	**Adopted**	**Items 60 to 65**
II.2.4.	The companies adopt a whistle-blowing policy that specifies the main rules and procedures to be followed for each communication and an internal reporting channel that also includes access for nonemployees, as set forth in the applicable law.	**Adopted**	**Item 49**
II.2.5.	The companies have specialised committees for matters of corporate governance, remuneration, appointments of members of the corporate bodies and performance assessment, separately or cumulatively. If the Remuneration Committee provided for in Article 399 of the Portuguese Commercial Companies Code has been set up, the present Recommendation can be complied with by assigning to said committee, if not prohibited by law, powers in the above matters.	**Adopted**	**Items 27, 29 and 67**
II.3. Relations between corporate bodies			
Principle: ***II.3.A. The corporate bodies create the conditions for them to act in a harmonious and articulated manner, within the scope of their responsibilities, and with information that is adequate for carrying out their functions.***			
II.3.1.	The Articles of Association or equivalent means adopted by the company set out the mechanisms to ensure that, within the limits of the applicable laws, the members of the management and supervisory bodies have permanent access to all necessary information to assess the performance, situation and development prospects of the company, including, specifically, the minutes of the meetings, the documentation supporting the decisions taken, the convening notices and the archive of the meetings of the executive management body, without prejudice to access to any other documents or persons who may be requested to provide clarification.	**Adopted**	**Items 21, 22, 28, 29 and 34**
II.3.2.	Each body and committee of the company ensures, in a timely and adequate manner, the interorganic flow of information required for the exercise of the legal and statutory powers of each of the other bodies and committees.	**Adopted**	**Item 22, 28, 29 and 34**
II.4. Conflicts of interest			
Principle: ***II.4.A. The existence of current or potential conflicts of interest between the members of bodies or committees and the company shall be prevented, ensuring that the conflicted member does not interfere in the decision-making process.***			
II.4.1.	By internal regulation or an equivalent hereof, the members of the management and supervisory bodies and of the internal committees shall be obliged to inform the respective body or committee whenever there are any facts that may constitute or give rise to a conflict between their interests and the interest of the company.	**Adopted**	**Item 26**
II.4.2.	The company adopts procedures to ensure that the conflicted member does not interfere in the decision-making process, without prejudice to the duty to provide information and clarification requested by the body, committee or respective members.	**Adopted**	**Item 26**

II.5. Transactions with related parties			
Principle: ***II.5.A. Transactions with related parties shall be justified by the interest of the company and shall be carried out under market conditions, being subject to principles of transparency and adequate supervision.***			
II.5.1.	The management body discloses, in the corporate governance report or by other publicly available means, the internal procedure for verification of transactions with related parties.	**Adopted**	**Items 34 and 89 to 91**
III	**SHAREHOLDERS AND GENERAL MEETING**		
Principles: ***III.A. The adequate involvement of shareholders in corporate governance constitutes a positive factor for the efficient functioning of the company and the achievement of its corporate objective.*** ***III.B. The company promotes the personal participation of shareholders at general meetings as a space for reflection on the company and for shareholders to communicate with the bodies and committees of the company.*** ***III.C. The company implements adequate means for shareholders to attend and vote at the general meeting without being present in person, including the possibility of sending in advance questions, requests for clarification or information on the matters to be decided on and the respective proposals.***			
III.1.	The company does not set an excessively large number of shares to be entitled to one vote and informs in the corporate governance report of its choice whenever each share does not carry one vote.	**Adopted**	**Item 12**
III.2.	The company that has issued special plural voting rights shares identifies, in its corporate governance report, the matters that, pursuant to the company's Articles of Association, are excluded from the scope of plural voting.	**N/A**	**Item 12** No shares with special plural voting rights were issued.
III.3.	The company does not adopt mechanisms that hinder the passing of resolutions by its shareholders, specifically fixing a quorum for resolutions greater than that foreseen by law.	**Adopted**	**Item 14**
III.4.	The company implements adequate means for shareholders to participate in the general meeting without being present in person, in proportion to its size.	**Adopted**	**Item 12**
III.5.	The company also implements adequate means for the exercise of voting rights without being present in person, including by correspondence and electronically.	**Adopted**	**Item 12** The Company further notes that the *raison d'être* of this Recommendation (i.e. to fully enable shareholders to exercise their voting rights) is ensured by other mechanisms, such as postal voting (commonly used), and by electronic means, with information on such possibilities promptly made available to the general public through the publication of a notice of meeting and other documents (including the ballot paper and forms) on the Company's website.
III.6.	The Articles of Association of the company that provide for the restriction of the number of votes that may be held or exercised by one single shareholder, either individually or jointly with other shareholders, shall also foresee that, at least every five years, the general meeting shall resolve on the amendment or maintenance of such statutory provision – without quorum requirements greater than that provided for by law – and that in said resolution, all votes issued are to be counted, without applying said restriction.	**N/A**	**Item 13** The articles of association do not set any limit on the number of votes that can be held or exercised by a sole shareholder.
III.7.	The company does not adopt any measures that require payments or the assumption of costs by the company in the event of change of control or change in the composition of the	**Adopted**	**Items 2, 4 and 5**

	management body and which are likely to damage the economic interest in the transfer of shares and the free assessment by shareholders of the performance of the Directors.		
IV	**MANAGEMENT**		
IV.1. Management Body and Executive Directors			
Principles: ***IV.1.A. The day-to-day management of the company shall be the responsibility of executive directors with the qualifications, skills, and experience appropriate for the position, pursuing the corporate goals and aiming to contribute to its sustainable development. IV.1.B. The determination of the number of executive directors shall take into account the size of the company, the complexity and geographical dispersion of its activity and the costs, bearing in mind the desirable flexibility in the running of the executive management.***			
IV.1.1.	The management body ensures that the company acts in accordance with its object and does not delegate powers, notably with regard to: i) definition of the corporate strategy and main policies of the company; ii) organisation and coordination of the corporate structure; iii) matters that shall be considered strategic due to the amounts, risk and particular characteristics involved.	**Adopted**	**Item 21**
IV.1.2.	The management body approves, by means of regulations or through an equivalent mechanism, the performance regime for executive directors applicable to the exercise of executive functions by them in entities outside the group.	**Adopted**	**Item 29**
IV.2. Management Body and Non-Executive Directors			
Principles: ***IV.2.A. For the full achievement of the corporate objective, the non-executive directors shall exercise, in an effective and judicious manner, a function of general supervision and of challenging the executive management, whereby such performance shall be complemented by commissions in areas that are central to the governance of the company. IV.2.B. The number and qualifications of the non-executive directors shall be adequate to provide the company with a balanced and appropriate diversity of professional skills, knowledge and experience.***			
IV.2.1.	Notwithstanding the legal duties of the chairman of the board of directors, if the latter is not independent, the independent directors – or, if there are not enough independent directors, the nonexecutive directors – shall appoint a coordinator among themselves to, in particular (i) act, whenever necessary, as interlocutor with the chairman of the board of directors and with the other directors, (ii) ensure that they have all the conditions and means required to carry out their duties, and (iii) coordinate their performance assessment by the administration body as provided for in Recommendation VI.1.1.; alternatively, the company may establish another equivalent mechanism to ensure such coordination.	**Adopted**	**Item 18**
IV.2.2.	The number of non-executive members of the management body shall be adequate to the size of the company and the complexity of the risks inherent to its activity, but sufficient to ensure the efficient performance of the tasks entrusted to them, whereby the formulation of this adequacy judgement shall be included in the corporate governance report.	**Adopted**	**Items 17 and 18**
IV.2.3.	The number of non-executive directors is greater than the number of executive directors.	**Adopted**	**Items 17 and 18**
IV.2.4.	The number of non-executive directors that meet the independence requirements is plural and is not less than one third of the total	**Not Adopted**	**Item 18**

	number of non-executive directors. For the purposes of the present Recommendation, a person is deemed independent when not associated to any specific interest group in the company, nor in any circumstances liable to affect his/her impartiality of analysis or decision, in particular in virtue of: Having carried out, continuously or intermittently, functions in any corporate body of the company for more than twelve years, with this period being counted regardless of whether or not it coincides with the end of the mandate; Having been an employee of the company or of a company that is controlled by or in a group relationship with the company in the last three years; Having, in the last three years, provided services or established a significant business relationship with the company or with a company that is controlled by or in a group relationship with the company, either directly or as a partner, director, manager or officer of a legal person; Being the beneficiary of remuneration paid by the company or by a company that is controlled by or in a group relationship with the company, in addition to remuneration stemming from the performance of the functions of director; Living in a non-marital partnership or being a spouse, relative or kin in a direct line and up to and including the 3rd degree, in a collateral line, of directors of the company, of directors of a legal person owning a qualifying stake in the company or of natural persons owning, directly or indirectly, a qualifying stake; Being a holder of a qualifying stake or representative of a shareholder that is holder of a qualifying stake.		
IV.2.5.	The provisions of paragraph (i) of the previous Recommendation do not prevent the qualification of a new Director as independent if, between the end of his/her functions in any corporate body and his/her new appointment, at least three years have elapsed (cooling-off period).	**N/A**	There are no directors under these conditions.
V	**SUPERVISION**		
Principles: ***V.A. The supervisory body carries out permanent supervision activities of the administration of the company, including, also from a preventive perspective, the monitoring of the activity of the company and, in particular, the decisions of fundamental importance for the company and for the full achievement of its corporate object.*** ***V.B. The composition of the supervisory body provides the company with a balanced and adequate diversity of professional skills, knowledge and experience.***			
V.1.	With due regard for the competences conferred to it by law, the supervisory body takes cognisance of the strategic guidelines and evaluates and renders an opinion on the risk policy, prior to its final approval by the administration body.	**Adopted**	**Items 34 and 38**
V.2.	The number of members of the supervisory body and of the f inancial matters committee should be adequate in relation to the size of the company and the complexity of the risks inherent to its activity, but sufficient to ensure the efficiency of the tasks entrusted to them, and this adequacy judgement should be included in the corporate governance report.	**Adopted**	**Items 29 and 31**

VI	PERFORMANCE ASSESSMENT, REMUNERATION AND APPOINTMENTS		
VI.1. Annual performance assessment			
Principle: ***VI.1.A. The company promotes the assessment of performance of the executive body and its individual members as well as the overall performance of the management body and its specialised committees.***			
VI.1.1.	The management body – or committee with relevant powers, composed of a majority of non-executive members – evaluates its performance on an annual basis, as well as the performance of the executive committee, of the executive directors and of the company committees, taking into account the compliance with the strategic plan of the company and of the budget, the risk management, its internal functioning and the contribution of each member to that end, and the relationship between the bodies and committees of the company.	**Adopted**	**Items 24, 25, 29, 70, 71 and following**
VI.2. Remunerations			
Principles: ***VI.2.A. The remuneration policy for members of the management and supervisory bodies shall allow the company to attract qualified professionals at a cost that is economically justified by their situation, provide for the alignment with the interests of the shareholders – taking into consideration the wealth effectively created by the company, the economic situation and the market situation – and shall constitute a factor for developing a culture of professionalism, sustainability, merit promotion and transparency in the company.*** ***VI.2.B. Taking into consideration that the position of directors is, by nature, a remunerated position, directors shall receive a remuneration:*** ***i) that adequately rewards the responsibility undertaken, the availability and competence placed at the service of the company;*** ***ii) that ensures a performance aligned with the long-term interests of shareholders and promotes the sustainable performance of the company; and*** ***iii) that rewards performance.***		
VI.2.1.	The company constitutes a remuneration committee, whose composition shall ensure its independence from the board of directors, whereby it may be the remuneration committee appointed pursuant to Article 399 of the Portuguese Commercial Companies Code.	**Adopted**	**Items 66 to 70**
VI.2.2.	The remuneration of the members of the management and supervisory bodies and of the company committees is established by the remuneration committee or by the general meeting, upon proposal of such committee.	**Adopted**	**Item 66**
VI.2.3.	The company discloses in the corporate governance report, or in the remuneration report, the termination of office of any member of a body or committee of the company, indicating the amounts of all costs related to the termination of office borne by the company, for any reason, during the financial year in question.	**Adopted**	**Items 80 to 83**
VI.2.4.	In order to provide information or clarification to shareholders, the president or another member of the remuneration committee shall be present at the annual general meeting and at any other general meeting at which the agenda includes a matter related to the remuneration of the members of bodies and committees of the company, or if such presence has been requested by shareholders.	**Adopted**	**Item 69**
VI.2.5.	Within the budget constraints of the company, the remuneration committee may freely decide to hire, on behalf of the company, consultancy services that are necessary or convenient for the performance of its duties.	**Adopted**	**Item 67**

VI.2.6.	The remuneration committee ensures that such services are provided independently.	**Adopted**	**Item 67**
VI.2.7.	The providers of said services are not hired by the company itself or by any company controlled by or in group relationship with the company, for the provision of any other services related to the competencies of the remuneration committee, without the express authorisation of the committee.	**Adopted**	**Item 67**
VI.2.8.	In view of the alignment of interests between the company and the executive directors, a part of their remuneration has a variable nature that reflects the sustained performance of the company and does not encourage excessive risk-taking.	**Adopted**	**Item 70**
VI.2.9.	A significant part of the variable component is partially deferred over time, for a period of no less than three years, and is linked to the confirmation of the sustainability of performance, in terms defined in the remuneration policy of the company.	**Adopted**	**Item 71**
VI.2.10.	When the variable remuneration includes options or other instruments directly or indirectly subject to share value, the start of the exercise period is deferred for a period of no less than three years.	**N/A**	Points 71 et seq Situation not foreseen.
VI.2.11.	The remuneration of non-executive directors does not include any component whose value depends on the performance of the company or of its value.	**Adopted**	**Items 69 and 78**
VI.3. Appointments			
Principle: ***VI.3.A. Regardless of the method of appointment, the knowledge, experience, professional background, and availability of the members of the corporate bodies and of the senior management** shall be adequate for the job to be performed.***			
VI.3.1.	The company promotes, in the terms it deems adequate, but in a manner susceptible of demonstration, that the proposals for the appointment of members of the corporate bodies are accompanied by grounds regarding the suitability of each of the candidates for the function to be performed.	**Adopted**	**Item 29**
VI.3.2.	The committee for the appointment of members of corporate bodies includes a majority of independent directors.	**Not Adopted**	**Item 29**
VI.3.3.	Unless it is not justified by the size of the company, the task of monitoring and supporting the appointments of senior managers shall be assigned to an appointment committee.	**N/A**	**Item 29** The management and supervisory bodies are directors of NOS.
VI.3.4.	The committee for the appointment of senior management provides its terms of reference and promotes, to the extent of its powers, the adoption of transparent selection processes that include effective mechanisms for identifying potential candidates, and that for selection those are proposed who present the greatest merit, are best suited for the requirements of the position and promote, within the organisation, an adequate diversity including regarding gender equality.	**N/A**	**Item 29** This recommendation should be interpreted as referring only to the commission indicated in Recommendation VI.3.3. (which was assessed as N/A)
VII	**INTERNAL CONTROL**		

Principle:
VII.A. Based on the medium and long-term strategy, the company shall establish a system of internal control, comprising the functions of risk management and control, compliance and internal audit, which allows for the anticipation and minimisation of the risks inherent to the activity developed.

VII.1.	The management body discusses and approves the strategic plan and risk policy of the company, which includes setting limits in matters of risk-taking.	**Adopted**	**Items 50 et seq**
VII.2.	The company has a specialised committee or a committee composed of specialists in risk matters, which reports regularly to the management body.	**Adopted**	**Items 50 and 51** The company has specialised Risk Committees.
VII.3.	The supervisory body is organised internally, implementing periodic control mechanisms and procedures, in order to ensure that the risks effectively incurred by the company are consistent with the objectives set by the administration body.	**Adopted**	**Item 50**
VII.4.	The internal control system, comprising the risk management, compliance, and internal audit functions, is structured in terms that are adequate to the size of the company and the complexity of the risks inherent to its activity, whereby the supervisory body shall assess it and, within the ambit of its duty to monitor the effectiveness of this system, propose any adjustments that may be deemed necessary.	**Adopted**	**Item 51**
VII.5.	The company establishes procedures of supervision, periodic assessment and adjustment of the internal control system, including an annual assessment of the degree of internal compliance and performance of such system, as well as the prospects for changing the previously defined risk framework.	**Adopted**	**Items 51 and 54**
VII.6.	Based on its risk policy, the company sets up a risk management function, identifying (i) the main risks to which it is subject in the operation of its business, (ii) the probability of their occurrence and respective impact, (iii) the instruments and measures to be adopted in order to mitigate such risks, and (iv) the monitoring procedures, aimed at following them up.	**Adopted**	**Items 53 and 54**
VII.7.	The company establishes processes to collect and process data related to the environmental and social sustainability in order to alert the management body to risks that the company may be incurring and propose strategies for their mitigation.	**Adopted**	**Item 52**
VII.8.	The company reports on how climate change is considered within the organisation and how it takes into account the analysis of climate risk in the decision-making processes..	**Adopted**	**Item 52**
VII.9.	The company informs in the corporate governance report on the manner in which artificial intelligence mechanisms have been used as a decision-making tool by the corporate bodies.	**Adopted**	**Item 52**
VII.10.	The supervisory body pronounces on the work plans and resources allocated to the services of the internal control system, including the risk management, compliance, and internal audit functions, and may propose adjustments as deemed necessary.	**Adopted**	**Item 51**

VII.11.	The supervisory body is the addressee of reports made by the internal control services, including the risk management, compliance, and internal audit functions, at least when matters related to accountability, identification or resolution of conflicts of interest and detection of potential irregularities are concerned.	**Adopted**	**Item 51**
VIII	**INFORMATION AND STATUTORY AUDIT OF ACCOUNTS**		
VIII.1. Information			
Principles: ***VIII.1.A. The supervisory body, diligently and with independence, ensures that the management body observes its responsibilities in choosing policies and adopting appropriate accounting criteria and establishing adequate systems for financial and sustainability reporting, and for internal control, including risk management, compliance and internal audit.*** ***VIII.1.B. The supervisory body promotes a proper articulation between the work of the internal audit and that of the statutory audit of accounts.***			
VIII.1.1.	The regulations of the supervisory body requires that the supervisory body monitors the suitability of the process of preparation and disclosure of information by the management body, including the appropriateness of accounting policies, estimates, judgements, relevant disclosures and their consistent application from financial year to financial year, in a duly documented and reported manner.	**Adopted**	**Item 34**
VIII.1. Statutory audit and supervision			
Principle: ***VIII.2.A. It is the responsibility of the supervisory body to establish and monitor formal, clear, and transparent procedures as to the relationship between the company and the statutory auditor and the supervision of compliance, by the statutory auditor, with the rules of independence imposed by law and by professional standards.***			
VIII.2.1.	By means of regulation, the supervisory body defines, in accordance with the applicable legal regime, the supervisory procedures to ensure the independence of the statutory auditor.	**Adopted**	**Item 34**
VIII.2.2.	The supervisory body is the main interlocutor of the statutory auditor within the company and the first addressee of the respective reports, and is competent, namely, for proposing the respective remuneration and ensuring that adequate conditions for the provision of the services are in place within the company.	**Adopted**	**Items 34 and 37**
VIII.2.3.	The supervisory body annually evaluates the work carried out by the statutory auditor, its independence and suitability for the exercise of its functions and shall propose to the competent body its dismissal or termination of the contract for the provision of its services whenever there is just cause to do so.	**Adopted**	**Items 34 and 37**

Part 3
Annex



Board of the General Meeting

Full Name
António Agostinho Cardoso da Conceição Guedes

Position
Chairman of the Board of General Meeting

Qualifications
Law Degree - Portuguese Catholic University, Porto
Master's Degree in Civil Law Sciences - Coimbra Faculty of Law
Doctorate in Civil Law Sciences - Portuguese Catholic University
Author and co-author of several publications in Civil and Commercial Law, including "A natureza jurídica do Direito de Preferência" [The Legal Nature of the Right of Preference], master's thesis, "O Exercício de Direito de Preferência" [The Exercise of the Right of Preference], doctoral thesis and "Estudos sobre a Decisão Judicial. Coordenadas da Decisão Judicial em Direito Privado" [Studies on Judicial Decision. Coordinates of Judicial Decision in Private Law]

Professional Experience
Member of the General Council of the Centre for Judicial Studies (elected by the Assembly of the Republic) (2011-2022)
Scientific Coordinator of the Double Degree course in Law and Management (Porto Regional Centre of the Portuguese Catholic University) (2014-2021)
Member of the Board of the Business Management School - Portuguese Catholic University, Porto Regional Centre (Católica Porto Business School) (2013-2020)
Vice-Chairman of the Board of the General Meeting - Banco BPI, S.A. (2016-2020)
Chairman of the Board of the General Meeting - Sonae Investimentos, SGPS, S.A. (2007-2018)
Chairman of the Board of the General Meeting - Sonae Indústria, SGPS, S.A. (2014-2015)
Chairman of the Board of the General Meeting - Sonaecom, SGPS, S.A. (2014-2015)
Member of the High Council - Portuguese Catholic University (2011-2013)
Secretary of the Board of the General Meeting - Sonae Indústria, SGPS, S.A. (2007-2014)
Secretary of the Board of the General Meeting - Sonaecom, SGPS, S.A. (2007-2014)
Chairman of the Board of the General Meeting - Sonae Capital, SGPS, S.A. (2007-2014)
Member of the Advisory Board - Escola de Gestão Empresarial UCP-CRP (2009-2013)
Director of the Porto School, Faculty of Law - Faculty of Law of the Portuguese Catholic University (2006-2013)
President of the Scientific Council of the Porto School - Faculty of Law of the Portuguese Catholic University (2006-2013)
President of the Pedagogical Council of the Porto School - Faculty of Law of the Portuguese Catholic University (2005-2006)

Offices held in other companies
Arbitrator at the Commercial Arbitration Institute (Portuguese Chamber of Commerce/Chamber of
Commerce and Industry of Porto)
Consultant - Morais Leitão, Galvão Teles, Soares da Silva e Associados – Sociedade de Advogados, RL
Associate Professor - Law Faculty of the Catholic University, Porto School



Board of the General Meeting

Full name
Maria Daniela Farto Batista Passos

Position
Secretary of the Board of General Meeting

Qualifications	Law Degree - Portuguese Catholic University, Porto Specialisation Course in Juridical-Commercial Sciences Master's Degree in Law, area of Juridical-Commercial Sciences Doctorate in Law, area of Juridical-Commercial Sciences
Professional Experience	Member of the Pedagogical Council of the Porto School of the Faculty of Law of the Portuguese Catholic University (since February 2023) Assistant - Porto School of the Faculty of Law of the Portuguese Catholic University – Introduction to Law; Introduction to Private Law; General Theory of Legal Relationships; Commercial Law and Company Law (2004-2015) Lecturer in the Master's Degree in Banking and Insurance - Faculty of Economics and Management of the Portuguese Catholic University of Porto - Subject Commercial Law (2012-2014) Member of the Direction Council - Porto School of the Faculty of Law of the Portuguese Catholic University (2002-2008) Trainer in Executive Process - Training Centre of the District Council of the Bar Association of Porto (2006-2007) Trainee Lecturer - Porto School of the Faculty of Law of the Portuguese Catholic University (2000-2004) Lecturer in the Postgraduate Course in Commercial Law and Company Law - Lisbon School of the Lisbon Faculty of the Portuguese Catholic University (since 2004) Member of the Católica Research Centre for the Future of Law (since 2015) Assistant Professor - Porto School of the Faculty of Law of the Portuguese Catholic University (2015-2024) Associate Professor of the Porto School of Law of the Portuguese Catholic University (since 2024) Subjects taught on the Master's Degree in Company and Business Law and in the Master's Degree in Law and Management: Securities and Capital Markets Law; Banking Law Subjects taught in the Law Degree and the Double Law Degree and Management: Commercial Law and Company Law Seminars taught: Dismissal and Exclusion of Members Lecturer in the Postgraduate Course in Securities Law - Lisbon Securities Institute (since 2017) Lecturer in the Advanced Postgraduation Course in Banking Law - Faculty of Law of the University of Lisbon (since 2017) Lecturer in the Postgraduation Course in Company Law - Porto School of the Faculty of Law of the Portuguese Catholic University (since 2020) Scientific Coordinator and Lecturer in the Postgraduation Course in Securities Law and Banking Law - Porto School of the Faculty of Law of the Portuguese Catholic University (since 2017)
Offices held in other companies	Scientific Coordinator and Lecturer in the Postgraduation Course in Securities Law and Banking Law - Porto School of the Faculty of Law of the Portuguese Catholic University (2017 until now) Lecturer in the Postgraduation Course in Company Law - Porto School of the Faculty of Law of the Portuguese Catholic University (2020 until now) Lecturer in the Advanced Postgraduation Course in Banking Law - Faculty of Law of the University of Lisbon (2017 until now) Lecturer in the Postgraduate Course in Securities Law - Lisbon Securities Institute (2017 until now)

	Member of the Centre for Studies and Research in Law at the Católica Research Centre for the Future of Law (2015 to present) Lecturer in the Postgraduate Course in Commercial Law and Company Law - Lisbon School of the Lisbon Faculty of the Portuguese Catholic University (2004 until now) Member of Bolsa de Árbitros of Revista de Direito Financeiro e dos Mercados de Capitais (since 2018) Member of the External Review Board of RED - Revista Eletrónica de Direito, of the Centre for Legal Research of the Faculty of Law of the University of Porto (since 2017) Member of Associação Direito das Sociedades em Revista (ADSR) (since 2014)



Board of Directors

Full name
Ângelo Gabriel Ribeirinho dos Santos Paupério

Position
Chairman of the Board of Directors

Qualifications

Degree in Civil Engineering from Faculty of Engineering of the University of Porto
Master in Companies Management MBA (Porto Business School)

Professional Experience

Structural Designer at Tecnopor (Civil Engineering) (1982-1984)
Manager at EDP (Energy) (1984-1989)
Leader of the Television Project Team at Sonae Tecnologias de Informação, S.A. (1989-1991)
Head of Planning and Management Control at Sonae Investimentos, S.A. (currently Sonae – SGPS, S.A.) (1991-1994)
Director of several subsidiaries of Sonae Distribuição, SGPS, S.A. (currently Sonae MC, SGPS, S.A.) – Retail (1994-1996)
Member of the Board of Directors of Modelo Continente Hipermercados, S.A. (1994-2007)
CFO of Sonae Distribuição, SGPS, SA (currently Sonae MC, SGPS, S.A.) and Board Director of several subsidiaries (Retail) (1996-2007)
Executive Member of the Board of Directors of Sonae Capital, SGPS, S.A. (1996-2007)
Executive Vice-Chairman, CFO and Chairman of the Finance Committee of Sonae – SGPS, S.A. (2000-2007)
Member of the Board of Directors of MDS – Corretor de Seguros, S.A. (2004-2009)
Member of the Board of Directors of Sonae Investments BV (2005-2016)
Member of the Board of Directors of Sontel BV (2006-2016)
Executive Vice-Chairman of Sonae – SGPS, S.A. (2007-April 2015)
Member of the Board of Directors of MDS, SGPS, S.A. (Chairman of the Board of Directors since October 2014) (2007-March 2018)
Member of the Board of Directors of Modelo Continente, SGPS, S.A. (Chairman of the Board of Directors since January 2019) (2009-2019)
Vice-Chairman of the Board of Directors of Sonae - Specialized Retail, SGPS, S.A. (2010-2016)
Vice-Chairman of the Board of Directors of Sonaerp - Retail Properties, S.A. (2010-2016)
Chairman of the Board of Directors of MDS Auto, Mediação de Seguros, S.A. (2010-2016)
Member of *Conselho Superior of Universidade Católica Portuguesa* (2010-2016)
Member of the Board of Directors of Sonae Center Serviços II, S.A. (currently Sonae MC – Serviços Partilhados, S.A.) (2010-2018)
Member of the High Council of Porto Business School (2011-2015)
Chairman of the Board of Directors of Sonaecom – Serviços Partilhados, S.A. (2012-2016)
Member of the Board of Directors of ZOPT, SGPS, S.A. (2012-2022)
Chairman of the Board of Directors of Sonae RE, S.A. (2013-2016)
Chairman of the Board of Directors of Sonaegest – Sociedade Gestora de Fundos de Investimento, SA (currently SFS – Gestão de Fundos, SGFI, S.A.) (2013-2016)
Chairman of the Board of Directors of Sonae Financial Services, SA (2014-2019)
Co-CEO of Sonae – SGPS, S.A. (2015-2019)
Chairman of the Board of Directors of SFS, Gestão e Consultoria, S.A. (2016-2019)
Member of the Board of Directors of Sonae Corporate, S.A. (2018-2019)
Vice-Chairman of the Board of Directors of Iberian Sports Retail Group, SL (2018-2020)
Member of the Board of Directors of Sonae Sierra, SGPS, S.A. (Since 2007)
Member of the Board of Directors of MCRETAIL, SGPS, S.A. (previously Sonae MC, SGPS, SA) (Since 2007)
Chairman of the Board of Directors of Sonaecom, SGPS, S.A. (Since 2007)
Chairman of the Board of Directors of Sonae Investment Management – Software and Technology, SGPS, S.A. (Since 2007)
Chairman of the Board of Directors of Público – Comunicação Social, S.A. (Since 2007)

	Chairman of the Board of Directors of Sonae Holdings, S.A. (Since 2018) Member of the Board of Directors of Efanor Investimentos, SGPS, SE (Since 2018) Member of the Board of Directors of Sonae – SGPS, S.A. (Since April 2019) Chairman of the Board of Directors of Universo Sonae, S.A. (previously Sonae FS, SA) (Since 2019) Member of the Board of Directors of Sonae Capital, SGPS, S.A. (Since 2019) Member of the Board of Directors of Fundação Manuel Cargaleiro (Since 2019) Member of the Board of Directors of Sonae Indústria, SGPS, S.A. (Since June 2021)
Offices held in other companies as of 31.12.2024	Chairman of the Board of Directors of Sonaecom, SGPS, S.A. Chairman of the Board of Directors of Sonae Investment Management – Software and Technology, SGPS, S.A. Chairman of the Board of Directors do Público - Comunicação Social, S.A. Chairman of the Board of Directors of NOS, SGPS, S.A. Member of the Board of Directors of Sonae, SGPS, S.A. Member of the Board of Directors of MCRETAIL, SGPS, S.A. Chairman of the Board of Directors of Sonae Holdings, S.A. Member of the Board of Directors of Sonae Sierra, SGPS, S.A. Chairman of the Board of Directors of Sonae Capital Investment, SGPS, S.A. Member of the Board of Directors of Sonae Indústria, SGPS, S.A. Member of the Board of Directors of Efanor Investimentos, SGPS, SE Member of the Board of Directors of Love Letters - Galeria de Arte, S.A. Chairman of the Board of Directors of Enxomil - Consultoria e Gestão, S.A. Chairman of the Board of Directors of Enxomil – Socieofde Imobiliária, S.A. Member of the Board of Directors de Violas, SGPS, S.A.
Offices held in other companies	Member do *Conselho Diretor* of APGEI (*Associação Portuguesa de Gestão e Engenharia Industrial*) Member of the Board of Directors of Fundação Cargaleiro



Board of Directors

Full name
Miguel Nuno Santos Almeida

Position
Chief Executive Officer

Qualifications	Degree in Mechanical Engineering from Faculty of Engineering of the University of Porto MBA from INSEAD
Professional Experience	Chairman of the Executive Committee of Optimus Comunicações, S.A. (2010-2013) Member of the Board of Directors and Executive Director of Sonaecom, SGPS, S.A. (2005-2013)
Offices held in other companies as of 31.12.2024	Chairman of the Board of Directors of NOS Comunicações, S.A. Chairman of the Board of Directors of NOS Inovação, S.A. Chairman of the Board of Directors of NOS Açores Comunicações S.A. Chairman of the Board of Directors of NOS Lusomundo Audiovisuais, S.A. Chairman of the Board of Directors of NOS Lusomundo Cinemas, S.A. Chairman of the Board of Directors of NOS Madeira Comunicações, S.A Chairman of the Board of Directors of NOS Audiovisuais SGPS, S.A. Chairman of the Board of Directors of NOS Corporate Center S.A. Chairman of the Board of Directors of NOS Audio - Sales and Distribution, S.A. Chairman of the Board of Directors of Ten Twenty One, S.A.



Board of Directors

Full Name
José Alexandre Koch Ferreira

Position
Executive Director

Qualifications	Degree and Master's in Informatics and Computer Engineering from the Faculty of Engineering of the University of Porto MBA from INSEAD
Professional Experience	Managing Director and Partner at Boston Consulting Group Managing Director and Partner at BCG X Strategy and Management at Portugal Telecom Started his professional career at Deloitte
Offices held in other companies as of 31.12.2024	Chairman of the Board of Directors of NOS Mediação de Seguros, S.A. Chairman of the Board of Directors of NOS Internacional SGPS, S.A. Chairman of the Board of Directors of Teliz Holding, S.A. Chairman of the Board of Directors of NOS Technology – Concepção, Construção e Gestão de Redes de Comunicações, S.A. Chairman of the Board of Directors of NOS Sistemas, S.A. Chairman of the Board of Directors of NOS Wholesale, S.A. Chairman of the Board of Directors of NOS Property, S.A. Chairman of the Board of Directors of Per-Mar, Sociedadede Construções, S.A. Chairman of the Board of Directors of Sontária – Empreendimentos Imobiliários, S.A. Chairman of the Board of Directors of Lusomundo Imobiliária 2, S.A. Chairman of the Board of Directors of Lusomundo Sociedade de Investimentos Imobiliários SGPS, S.A. Member of the Board of Directors of Mstar, S.A. Member of the Board of Directors of NOS Lusomundo Cinemas, S.A. Member of the Board of Directors of NOS Comunicações, S.A. Member of the Board of Directors of NOS Sistemas España, S.L., S.L. Member of the Board of Directors of NOS Açores Comunicações, S.A. Member of the Board of Directors of NOS Madeira Comunicações, S.A. Member of the Board of Directors of Upstar Comunicações, S.A. Member of the Board of Directors of Sport TV Portugal, S.A. Member of the Board of Directors of NOS Corporate Center, S.A. Manager of Empracine - Empresa Promotora de Atividades Cinematográficas, Lda.



Board of Directors

Full name
Daniel Lopes Beato

Position

Executive Director

Qualifications	Degree in Electronic and Telecommunications Engineering from the University of Aveiro MBA Full Time, IESE Business School – University of Navarra Barcelona
Professional Experience	Marketing Director of B2C at NOS Comunicações S.A. Project Leader at the Boston Consulting Group (Aug.2012 - Jan.2015)
Offices held in other companies as of 31.12.2024	Member of the Board of Directors of NOS Comunicações, S.A Member of the Board of Directors of NOS Açores Comunicações, S.A. Member of the Board of Directors of NOS Madeira Comunicações, S.A. Member of the Board of Directors of NOS Technology – Concepção, Construção e Gestão de Redes de Comunicações, S.A. Member of the Board of Directors of NOS Property, S.A. Member of the Board of Directors of NOS Mediação Seguros, S.A.



Board of Directors

Full name
Filipa de Sousa Taveira da Gama Santos Carvalho

Position

Executive Director

Qualifications	Law Degree from the Portuguese Catholic University (Porto) Postgraduation in Management for Law graduates, Portuguese Catholic University (Porto) MBA in Management, Portuguese Catholic University (Porto)
Professional Experience	Director of the Legal and Regulatory area of NOS Corporate Center, S.A. Member of the Legal and Regulatory area of Sonaecom, SGPS, S.A. (2003-2013) Member of the legal team of Sonaecom, SGPS, S.A. (1998-2003) Member of the legal team of the Corporate Finance of Banco Português de Investimento, S.A. (Feb.1998 -Sep.1998)
Offices held in other companies as of 31.12.2024	Member of the Board of Directors of NOS Comunicações, S.A. Member of the Board of Directors of NOS Corporate Center, S.A. Member of the Board of Directors of NOS Açores Comunicações, S.A. Member of the Board of Directors of NOS Madeira Comunicações, S.A. Member of the Board of Directors of NOS Audiovisuais, SGPS, S.A. Member of the Board of Directors of NOS Lusomundo Audiovisuais, S.A. Member of the Board of Directors of NOS Lusomundo Cinemas, S.A. Member of the Board of Directors of NOS Audio - Sales and Distribution, S.A. Member of the Board of Directors of Sport TV Portugal, S.A. Member of the Board of Directors of Upstar Comunicações, S.A. Member of the Board of Directors of Teliz Holding, S.A. Member of Direção of *Apritel – Associação dos Operadores de Comunicações Eletrónicas* Member of Direção of *APDC – Associação Portuguesa das Comunicações* Vice-Chairman of the Board of the General Meeting of *Banco Alimentar contra a Fome*



Board of Directors

Full name
Jorge Filipe Pinto Sequeira dos Santos Graça

Position
Executive Director

Qualifications	Degree in Business Management and Administration from the Portuguese Catholic University MBA from Kellogg School of Management at Northwestern University
Professional Experience	Director of ZON TV Cabo responsible for Product and Marketing (2010-2013) Director of Product TV of ZON TV Cabo (2007-2010) Project Leader at The Boston Consulting Group (2003-2004)
Offices held in other companies as of 31.12.2024	Member of the Board of Directors of NOS Comunicações, S.A. Member of the Board of Directors of NOS Açores Comunicações, S.A. Member of the Board of Directors of NOS Madeira Comunicações, S.A. Member of the Board of Directors of NOS Inovação S.A. Member of the Board of Directors of NOS Technology – Concepção, Construção e Gestão de Redes de Comunicações, S.A. Member of the Board of Directors of Ten Twenty One, S.A. Member of the Board of Directors of Dreamia, Serviços de Televisão, S.A. Member of the Board of Directors of Dreamia Servicios de Televisión, S.L. Member of the Board of Directors of NOS Sistemas, S.A. Member of the Board of Directors of Dualgrid, Gestão de Redes Partilhados, S.A. Member of the Board of Directors of Daredata, S.A.



Board of Directors

Full name
Luís Moutinho do Nascimento

Position
Executive Director

Qualifications	Degree in Business Administration from the Portuguese Catholic University MBA from INSEAD
Professional Experience	Member of the Executive Committee of Portugal Telecom, responsible for B2C Sales and Marketing (2015-2017) Manager of the Home Segment & CRM of Portugal Telecom (2007-2015) Non-Executive Member of the Board of Directors of PT Contact (2011-2014) Former Manager of Strategic Marketing at PT Multimédia Former Associate and Manager at Diamond Cluster Started his career as analyst at McKinsey & Company
Offices held in other companies as of 31.12.2024	Member of the Board of Directors of NOS Comunicações, S.A. Member of the Board of Directors of NOS Açores Comunicações, S.A. Member of the Board of Directors of NOS Madeira Comunicações, S.A. Member of the Board of Directors of NOS Technology – Concepção, Construção e Gestão de Redes de Comunicações, S.A. Member of the Board of Directors of NOS Sistemas, S.A. Member of the Board of Directors of NOS Inovação, S.A. Member of the Board of Directors of NOS Lusomundo Cinemas, S.A. Member of the Board of Directors of NOS Lusomundo Audiovisuais, S.A. Member of the Board of Directors of NOS Audio - Sales and Distribution, S.A. Member of the Board of Directors of NOS Audiovisuais SGPS, S.A. Member of the Board of Directors of Dreamia - Serviços de Televisão, S.A. Member of the Board of Directors of Dreamia Servicios de Televisión, S.L. Member of the Board of Directors of NOS Corporate Center, S.A. Member of the Board of Directors of NOS Wholesale, S.A. Member of the Board of Directors of NOS Property, S.A. Member of the Board of Directors of Per-Mar, Sociedade de Construções, S.A. Member of the Board of Directors of Sontária – Empreendimentos Imobiliários, S.A. Member of the Board of Directors of Lusomundo Imobiliária 2, S.A. Member of the Board of Directors of Lusomundo Sociedade de Investimentos Imobiliários SGPS, S.A. Manager of Empracine - Empresa Promotora de Atividades Cinematográficas, Lda.



Board of Directors

Full name
Manuel António Neto Portugal Ramalho Eanes

Position
Executive Director

Qualifications	Degree in Management from the Portuguese Catholic University MBA from INSEAD
Professional Experience	Executive Director of Optimus Comunicações, S.A., responsible for Companies and Operators (2010-2013) Former Director at Optimus of Home Wireline, Central Marketing, Data Service, Particular Sales, SMEs and Business Development (1999-2009) Started his career in McKinsey & Co. (1995-1999)
Offices held in other companies as of 31.12.2024	Member of the Board of Directors of NOS Comunicações S.A. Member of the Board of Directors of NOS Açores Comunicações, S.A. Member of the Board of Directors of NOS Madeira Comunicações, S.A. Member of the Board of Directors of NOS Internacional SGPS, S.A. Member of the Board of Directors of NOS Wholesale, S.A. Member of the Board of Directors of NOS Sistemas España S.L. Member of the Board of Directors of Ten Twenty One, S.A. Member of the Board of Directors of Teliz Holding S.A. Member of the Board of Directors of Brightcity, S.A.



Board of Directors

Full name
Ana Rita Ferreira Rodrigues

Position
Non-Executive Director

Qualifications	Degree in Management from the Faculty of Economics, University of Porto Postgraduation in Tax Law at the Faculty of Law of the University of Coimbra MBA at Porto Business School
Professional Experience	Manager, PTCG – Consultoria de Gestão, Lda. (2020-2022) Project Director, Terra Peregrin, S.A. (2020-2022) Member of the Board of Directors Santoro Finance – Prestação de Serviços, S.A. (2018-2020) Project Director, Santoro Finance – Prestação de Serviços, S.A. (2017-2020) Manager - Transaction Services, PricewaterhouseCoopers - AG Assessoria de Gestão, Lda. (2015-2017) Head of Control and Consolidation Department of Sonaecom, SGPS (2011-2015) Associate, Audit, PricewaterhouseCoopers & Associados, SROC, Lda. (2009-2011)
Offices held in other companies as of 31.12.2024	CFO, APCL Invest, S.A.



Board of Directors

Full name
António Bernardo Aranha da Gama Lobo Xavier

Position
Non-Executive Director

Qualifications	Law Degree Master's Degree in Economic Law by the University of Coimbra
Professional Experience	Assistant at Faculty of Law of the University of Coimbra, where he taught Political Economy and Public Finance (1983–1988) Assistant at Faculty of Law of the University of Coimbra, responsible for the theoretical courses of Administrative and Tax Law (1988–1994) Professor of the European Studies Course, of the Faculty of Law of the University of Coimbra, where he co-chaired the Political Finances and Tax Harmonisation (1988-1994) Guest professor of the Law Department in the Portucalense University (1988-1994) Executive director of SIVA, SGPS, responsible for taxes and investors relationship (1996-1999) Member of the Board of Directors of FC Porto – SAD (2000-2002) Since 1985, he acted as an independent legal consultant Since 2006, Partner of "Morais Leitão, Galvão Teles, Soares of Silva & Associados – Sociedade de Advogados" Non-Executive Member of Sonaecom, SGPS, S.A. (2017-2018) Executive Member of Sonaecom, SGPS, S.A. (2004–2010) Vice-Chairman of the Board of Directors of Fundação de Serralves (2000–2010) Non-Executive Member of the Board of Directors of Público, S.A. (2000–2016) Non-Executive Member of the Board of Directors of PCJ – Público, Comunicação, Jornalismo, S.A. (2010–2016) Non-Executive Member of the Board of Directors of Sonae IM, SGPS, S.A. (2010–2016) Chairman of the Retirement Committee of IRC (2013)
Offices held in other companies as of 31.12.2024	Partner of Morais Leitão, Galvão Teles, Soares of Silva & Associados Chairman of the Board of the General Meeting of Têxtil Manuel Gonçalves S.A. Chairman of the Board of the General Meeting of Mysticinvest – Holding, S.A. Vice-Chairman of the Board of Directors do Banco BPI, SGPS, S.A. Director of BA Glass – Serviços de Gestão e Investimento, S.A. Member of the Board of Directors of Riopele, S.A. Member of the Board of Trustees of Fundação Belmiro de Azevedo Chairman of the Board of the General Meeting of Greenvolt – Energias Renováveis, S.A. Council of State (since 07.04.2016)



Board of Directors

Full name
Catarina Eufémia Amorim da Luz Tavira Van-Dúnem

Position
Non Executive Director

Qualifications	Degree in Management and Company Organisation from Instituto Universitário de Lisboa, ISCTE *Instituto Superior de Ciências do Trabalho e da Empresa*
Professional Experience	Was part of the startup operation of the company engaged with the distribution of channels via satellite in Angola and Mozambique since 2009 Created and led the Products and Services team of Unitel, the leading telecommunications operator in Angola (2005-2009) Started her career in the USA as assistant manager in Sentis and Coral, partners of Shell Oil USA (2003-2005)
Offices held in other companies as of 31.12.2024	Executive Director of Finstar / ZAP General Coordination of the TV content production studios at ZAP Executive Member of the Marketing and Product team which she created, launched and currently manages in ZAP, the company engaged with the distribution of TV channels via satellite in Angola and Mozambique



Board of Directors

Full name
Cristina Maria de Jesus Marques

Position
Non Executive Director

Qualifications	Executive MBA from Lisbon MBA Católica, Nova & MIT | Best Student Award Disciplined Entrepreneurship from MIT Sloan School of Management Corporate Governance: The Board Leadership at Nova School of Business Economics Senior Management Training at Instituto de Formação Bancária (IFB) Master of science in Business Administration, with specialization in Finance at CATÓLICA-LISBON School of Business and Economics Degree in Economics from Higher Institute of Economics and Management
Professional Experience	Member of the Board of Directors of NOS, SGPS, S.A. (since 23-03-2020) Manager of Terra Peregrin, S.A. (2020-2022) Project Manager of Santoro-Finance – Prestação de Serviços, S.A. (2016-2020) Business Consultant of Capgemini Consulting (2013-2016) Controller of the Information Systems Department of Energias de Portugal (EDP) (2011-2012)
Offices held in other companies as of 31.12.2024	Strategy&Insights Iberia at Cabot Financial (Encore Capital Group)



Board of Directors

Full name
Eduardo António Salvador Verde Rodrigues Pinho

Position
Non-Executive Director

Qualifications	Law Degree
Professional Experience	Member of the Board of Directors of Englimo - Empreendimentos Imobiliários, S.A. Founding Partner of Osório de Castro, Verde Pinho, Vieira Peres, Lobo Xavier & Associados - Sociedade de Advogados Member of the Board of Trustees of Fundação Romão de Sousa
Offices held in other companies as of 31.12.2024	Partner and Director of Morais Leitão, Galvão Teles, Soares da Silva & Associados - Sociedade de Advogados



Board of Directors

Full name
João Pedro Magalhães da Silva Torres Dolores

Position
Non-Executive Director

Qualifications	Degree in Economics from University of Porto, Faculty of Economics Postgraduate Degree in Business – New York University, New York MBA from London Business School
Professional Experience	Brand manager – JW Burmester, S.A., New York (2003-2004) Analyst at McKinsey & Company (2005-2007) Associate at McKinsey & Company (2009-2011) Deputy Manager of Innovation Management of Portugal Telecom (2011- 2013) Head of Business Unit Cloud of Portugal Telecom (2013-2014) Head of Corporate Strategy of Sonae – SGPS, S.A. (2014-2015) Head of Group Strategy, Planning and Control of Sonae – SGPS, S.A. (2015-2018) Professor of the Strategy course – Executive MBA of Porto Business School (2016-2018) Director of Corporate Centre of Sonae – SGPS, S.A. (2018-2019) Non-Executive Chairman of the Board of Directors of Directors of MKTPlace - Comércio Eletrónico, S.A. (2018-julho 2022) Member of the Board of Directors of Sonae RE, S.A. (2021-2022) Member of the Board of Directors of Iberian Sports Retail Group, S.L. (2020-Oct.2023) Non-Executive Member of the Board of Directors of NOS, SGPS, S.A. (Since 2016) Non- Executive Member of the Board of Directors of MCRETAIL, SGPS, S.A. (previously Sonae MC, SGPS, SA) (Since 2018) Chairman of the Board of Directors of Sonae Corporate, S.A. (from 2018-Dec- 2019 Member of the Board of Directors) (Since 2018) Member of the Board of Directors of Sonae Holdings, S.A. (Since 2018) Executive Member of the Board of Directors of Sonae Investments, BV (Since 2018) Executive Member of the Board of Directors of Sontel, BV (Since 2018) Member of the Board of Directors of Sonaecom, SGPS, S.A. (Since 2019) Member of the Board of Directors and Executive Member of Sonae - SGPS, S.A. (Since April 2019) Non-Executive Member of the of Directors of Sonae Sierra, SGPS, S.A. (Since 2019) Member of the Board of Directors of Universo Sonae, S.A. (previously Sonae FS, S.A.) (Since 2019) Member of the Board of Directors of Iberian Sports Retail Group, S.L. (Since 2020) Member of the Board of Directors of Sonae Investment Management – Software and Technology, SGPS, S.A. (Since August 2020) Member of the Board of Directors of Sparkfood, SA (previously Sonae Food4Future, S.A.) (Since July 2021) Chairman of the Board of Directors of Sparkfood Ingredients, SA (previously Wad Lab, S.A.) (Since April 2023)
Offices held in other companies as of 31.12.2024	Member of the Board of Directors of Sonae, SGPS, S.A. Non-Executive Member of the Board of Directors of MCRETAIL, SGPS, S.A. Chairman of the Board of Directors of Sonae Corporate, S.A. Member of the Board of Directors of Sonae Holding, S.A. Executive Member of the Board of Directors of Sonae Investments, BV Executive Member of the Board of Directors of Sontel, BV Member of the Board of Directors of Sonaecom, SGPS, S.A. Non-Executive Member of the Board of Directors of Sonae Sierra, SGPS, S.A. Chairman of the Board of Directors of Sonae RE, S.A. Member of the Board of Directors of Universo Sonae, S.A. Member of the Board of Directors of Sonae Investment Management – Software and Technology, SGPS, S.A. Member of the Board of Directors of Sparkfood, S.A. Chairman of the Board of Directors of Sparkfood Ingredients, S.A. Chairman of the Board of Directors of Flybird Holding Oy Chairman of the Board of Directors of Fashion Division, S.A. Member of the Board of Directors of Modalfa - Comércio e Serviço, S.A. Member of the Board of Directors of Zippy - Comércio e Distribuição, S.A. Member of the Board of Directors of Musti Group Pic



Board of Directors

Full name
Maria Cláudia Teixeira de Azevedo

Position
Non-Executive Director

Qualifications	Degree in Management from the Portuguese Catholic University MBA from INSEAD
Offices held in other companies as of 31.12.2024	CEO of Sonae, SGPS, S.A. Chairwoman of the Board of Directors of MCRETAIL, SGPS, S.A. (previously Sonae MC, SGPS, S.A.) Chairwoman of the Board of Directors of Sonae Sierra, SGPS, S.A. Member of the Board of Directors of Sonae Holding, S.A. Member of the Board of Directors of SONAECOM – SGPS, S.A. Member of the Board of Directors of Sonae Investment Management - Software and Technology, SGPS, S.A. Member of the Board of Directors of Público - Comunicação Social, S.A. Chairwoman of the Board of Directors of Sparkfood S.A. (previously Sonae Food4Future, S.A.) Member of the Board of Directors of Sonae Indústria, SGPS, S.A. Member of the Board of Directors of SC – Sonae Capital Investment, SGPS, S.A. (previously Sonae Capital, SGPS, S.A.) Chairwoman of the Board of Directors of Musti Group Pic Member of the Board of Directors of EFANOR – Serviços de Apoio à Gestão, S.A. Member of the Board of Directors of EFANOR – Investimentos SGPS, S.A. Member of the Board of Directors of Setimanale SGPS S.A. Member of the Board of Directors of Casa Agrícola de Ambrães, S.A. Member of the Board of Directors of Realejo – Sociedade Imobiliária, S.A. Chairwoman of the Board of Directors of IMPARFIN – Investimentos e Participações Financeiras, S.A. Chairwoman of the Board of Directors of LINHACOM, S.A. Chairwoman of the Board of Directors of Praça Foz - Sociedade Imobiliária, S.A. Manager of Tangerine Wish, Lda. Vice-Chairwoman of the Board of BRP – Associação Business Roundtable Portugal



Statutory Independent Audit Board

Full name
José Pereira Alves

Position
Chairman

Qualifications	Degree in Economics from Faculty of Economics of the University of Porto
Professional Experience	Member of the Statutory Independent Audit Board of GMG – Grupo Manuel Gonçalves, SGPS, S.A. (Jun 2019 - May 2021) Member of the Statutory Independent Audit Board of Gestmin SGPS, S.A. (March2017 – Dec.2018) Partner of PwC Portugal (1994-2016) PwC Leader as the Territory Senior Party - Chairman (Jul 2011 - Jun 2015) Member of the management body of PwC in Portugal, as the Territory Human Capital Partner, as well as being responsible for the area of Knowledge Management (2007-2011) He was a faculty member on the MBA in Finance at the Faculty of Economics of Porto University (2004-2008) Joined the Territory Leadership Team, management body of PwC in Portugal, taking responsibility for the areas of Learning & Development and Audit Methodology (2001-2003) He was responsible for the coordination of the Postgraduate Course in Auditing at ISAG (2000-2002) As partner in PricewaterhouseCoopers (PwC), for over 22 years, was responsible for the coordination of audit work and auditing of accounts for several groups, including Amorim, RAR, Salvador Caetano, Nors, Ibersol, TAP, CTT, Semapa and Jerónimo Martins, among others In 1993, he became a partner of Bernardes, Sismeiro & Associados, SROC In 1990, after a professional qualification examination, he became a Statutory Auditor, registered on the official list of the, then, Chamber of Chartered Accountants and became an employee of the Statutory Auditing Firm Boto, Amorim & Associados, SROC He started his professional activity in 1984 as an audit officer at the international audit firm Coopers & Lybrand and was responsible for the implementation and control of several financial audits analysis of internal control systems and accounting procedures
Offices held in other companies as of 31.12.2024	Chairman of the Audit Committee of Corticeira Amorim, SGPS, S.A. Chairman of the Statutory Independent Audit Board of The Fladgate Partnership, S.A. Chairman of the Statutory Independent Audit Board of Galp Energia, SGPS, S.A. Chairman of the Statutory Independent Audit Board of SIERRA IG, SGOIC, S.A



Statutory Independent Audit Board

Full name
Patrícia Teixeira Lopes

Position
Member

Qualifications	Sustainable Management Degree: A Leadership Expedition to the Future, Porto Business School, 2020 Orchestrating Winning Performance Program course, IMD Business School, June 2019 Doctorate in Business Science from the University of Porto, Faculty of Economics (FEP) Master's Degree in Business Science, with an expertise in Financing (FEP) Degree in Management (FEP)
Professional Experience	Pro-Dean of University of Porto, in charge of strategic planning and management (2008-2015) Member of the BIOPOLIS Installation Committee, Centre of Excellence for Basic and Environmental Biology, Ecosystem Monitoring and AgroBiodiversity (2020-2021) Chairwoman of the Statutory Independent Audit Board of Fundação Instituto Marques of Silva (2012-2016) Member of the General Council of INESC – TEC (2012-2015) Member of the Statutory Independent Audit Board of Fundação Ciência e Desenvolvimento (2008-2012) Member of the Board of UPTEC – Associação para o Desenvolvimento do Parque de Ciência e Tecnologia of Universidade do Porto (2008-2009) Diretor of the Stock Market Institut of Euronext Lisboa (1999-2002) Author of several papers on national and international professional and academic magazines, regular speaker in conferences in its areas of expertise
Offices held in other companies as of 31.12.2024	Vice-Dean of Porto Business School Sustainability Officer of Porto Business School Member of the Remuneration Committee of Caixa Geral de Depósitos Non Executive Director of Fundaçao BIAL Member of the Board of Trustees of Fundação Santander Member of Statutory Independent Audit Board of BIAL



Statutory Independent Audit Board

Full name
Paulo Cardoso Correia da Mota Pinto

Position
Member

Qualifications	Degree, Master's, and Ph.D. in Civil Law Sciences at Faculty of Law of the University of Coimbra
Professional Experience	He was Chairman of the General Meeting of the Caixa Geral de Depósitos (2016-2021) He was Chairman of the Intelligence Oversight Committee of the Portuguese Republic, elected by the Assembly of the Republic (March.2013 - Dec.2017) He was Former Member of Parliament, Chairman of the Parliamentary Budget and Finance Committee of the 11th Legislature (Nov.2009 - Apr.2011), and Chairman of the European Affairs Committee of the 12th Legislature (Jun.2011- Oct2015) He was Former Vice-Chairman of the National Political Committee of PSD (2008-2010) He was Constitutional Court Judge, elected by the Assembly of the Republic (11 Mar 1998-4 Apr 2007) Former Legal Advisor of BPI - Banco Português de Investimento (1991-1998)
Offices held in other companies as of 31.12.2024	Professor at the Faculty of Law of the University of Coimbra. He has also taught and given lectures in the field of private law at other universities in Portugal and abroad (Brazil, Angola, Mozambique, Macau, Spain, Germany, etc.) Manager at Conselhos & Rotinas, Lda. Member of various Master's and Doctorate panels, particularly in the field of private law, sometimes as examiner. He has published studies (articles and books) mainly in the field of civil law and fundamental rights and has written preliminary drafts of laws (such as the legal rules governing the sale of consumer goods and direct-mail advertising) Legal adviser and arbitrator. In this latter capacity, he has chaired or been a member of adhoc arbitral tribunals, set up by the Centres for Commercial Arbitration of the Associação Comercial do Porto and the Associação Comercial de Lisboa or for the International Court of Arbitration of the International Chamber of Commerce



Statutory Independent Audit Board

Full name
Ana Luísa Nabais Aniceto da Fonte

Position
Alternate Member

Qualifications	Degree in Business Management and Administration from the Faculty of Economics and Management of the Portuguese Catholic University Member of the Portuguese Institute of Statutory Auditors and the Portuguese Chartered Accountants Association
Professional Experience	Worked at Grant Thornton's Porto office (2010-2016) Ernst & Young (Mozambique) (2007-2010) Auditor at PricewaterhouseCoopers – PwC (2001-2007)
Offices held in other companies as of 31.12.2024	Partner at the Statutory Auditing Firm Ana Fonte & Associados (until September 2023) Member of the Statutory Independent Audit Board of SDSR – Sports Division SR, S.A. Chairwoman of the Statutory Independent Audit Board of the Sociedade Gestora dos Fundos de Pensões do Banco de Portugal, S.A. (until July 2024) Member of the Statutory Independent Audit Board at MARTIFER S.G.P.S. S.A. (Alternate) Representative of the Portuguese Institute of Statutory Auditors in the "Young Professionals" working group of Accountancy Europe (ended at the beginning of 2021) Assistant to the Director of the Northern Regional Services of the Portuguese Institute of Statutory Auditors (ended at the beginning of 2021) Since 2016, she has collaborated with the technical department of the Portuguese Institute of Statutory Auditors in the revision of regulations applicable to the profession (ended at the beginning of 2021) Since 2011, she has been teaching the audit modules of the Preparation Course for Statutory Auditor and she is also a trainer for several audit training sessions organised by the Portuguese Institute of Statutory Auditors as part of the continuous training of Statutory Auditors (ended at the beginning of 2021) In collaboration with the Portuguese Institute of Statutory Auditors, she is an audit trainer on the preparation course for Admission to the College of Certified Auditors of the Mozambican Order of Accountants and Auditors (ended at the beginning of 2021) She is a lecturer in auditing on the Degree in Management, as well as on the Master's Degree in Auditing and Taxation and the Financial Information and Business Performance course of the Master's Degree in Management at the Portuguese Catholic University



Remuneration Committee

Full name
João Nonell Günther Amaral

Functions
Chairman

Qualifications	Master's Degree in Electrical and Computer Engineering - Porto University (1988-1993) MBA Executive – Porto Business School (2000-2001) Retail Strategic Management – Babson College Accelerated Development Program – London Business School Logistics, Materials and Supply Chain Management - Stanford University (2015)
Professional Experience	IT Manager - Project Manager of Innovation Strategy in North of Portugal Innovation Agency – Innovation and Systems Analyst (1994-1997) Diretor for Business Development and Innovation - IT Director responsible for Implementing the SAP Project at Leica Portugal, in direct collaboration with Leica AG in Germany (2001-2003) Deputy CDO - Chief Development Officer of Sonae - SGPS, S.A. (Since May 2019-2023) Member of the Board of Directors of Sonae FS, SA (currently Universo Sonae, S.A.) (2019-Nov 2024) Member of the Board of Directors of Musti Group Plc (since May de 2024) Member of Remuneration Committee of Sonaecom, SGPS, S.A. (em representação of Sonae – SGPS, SA) (since April de 2024) Alternate Member of the Board of Directors of Flybird Holding Oy (since November 2023) Member of the Board of Directors of Sparkfood Ingredients, S.A. (since 2023) Executive Member of the Board of Directors of Sonae - SGPS, S.A. (since April 2023) Member of the Board of Directors of Sparkfood, S.A. (since 2021) Member of the Board of Directors of Sonae Investment Management – Software and Technology, SGPS, S.A. (since 2020) Member of the Board of Directors of SIRS - Sociedade Independente de Radiodifusão Sonora, S.A. (since 2020) Chairman of the Board of Directors of PCJ – Público – Comunicação e Jornalismo, S.A. (since 2019) Member of the Board of Directors of Público - Comunicação Social, S.A. (since 2019) Member of the Board of Directors of Sonae Corporate, S.A. (since 2019) Member of the Board of Directors of Sonae Holdings, S.A. (since 2019) Member of the Board of Director of Sonae MC, SGPS, S.A. (currently MCRETAIL, S.A.) (since May 2024)
Offices held in other companies as of 31.12.2024	Member of the Board of Directors of Sonae MC, SGPS, S.A. (currently MCRETAIL, S.A.) Member of the Board of Directors of Sonae Holdings, S.A. Member of the Board of Directors of Sonae Corporate, S.A. Member of the Board of Directors of Público - Comunicação Social, S.A. Chairman of the Board of Directors of PCJ – Público – Comunicação e Jornalismo, S.A. Member of the Board of Directors of SIRS - Sociedade Independente de Radiodifusão Sonora, S.A. Member of the Board of Directors of Sonae Investment Management – Software and Technology, SGPS, S.A. Member of the Board of Directors of Sparkfood, S.A. Member of the Board of Directors of Sparkfood Ingredients, S.A. Alternate Member of the Board of Directors of Flybird Holding Oy Member of Remuneration Committee of Sonaecom, SGPS, S.A. (representing Sonae – SGPS, S.A.) Member of the Board of Directors of Musti Group Plc



Remuneration Committee

Full name
Mário Filipe Moreira Leite da Silva

Position
Member

Qualifications	Degree in Economy from Porto's Faculty of Economics Theoretical part of the Master's Degree in Business Science, with an expertise in Financing
Professional Experience	Member of the Board of Directors of NOS, SGPS, S.A. (2009-2020) Chairman of the Board of Directors do BFA - Banco Fomento Angola (2017-2020) Chairman of the Board of Directors of Efacec Power Solutions, SGPS, S.A. (2015-2020) Member of the Board of Directors of ZOPT, SGPS, S.A. (2009-2022) Member of the Board of Directors of Kento Holding Limited (2009-2021) Member of the Board of Directors of Banco BPI, S.A. (2013-2017) Member of the Auditing and Internal Control Committee of Banco BPI, S.A. (2011-2017) Chairman of the Board of Directors of Fidequity – Serviços de Gestão, S.A. (2006-2020) Chairman of the Board of Directors of Santoro Financial Holding, SGPS, S.A. (2006-2020) Administrative Director and CFO of Américo Amorim Group (2002-2006) CFO of Grundig Auto-Rádios Portugal (1999-2001) Lecturer at the Portuguese Catholic University (1997-2001), at the Porto Business School (2013-2020) and at the Porto Accounting and Business School (since 2022) Team Manager in the Audit Department of PricewaterhouseCoopers (1996-1999) Analyst in the Analysis and Credit Risks Control Department of BNC – Banco Nacional de Crédito (1995-1996)
Offices held in other companies as of 31.12.2024	Member of the Board of Directors of LIVREFLUXO, S.A. Member of the Board of Directors of Expressão Livre SGPS, S.A. Member of the Board of Directors of Medialivre Cofina Media, S.A.



03
WE ARE MADE OF SOLIDITY

CONSOLIDATED FINANCIAL STATEMENTS

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Consolidated statement of financial position

As at 31 December 2023 and 2024

(Amounts expressed in thousands of Euro)

	Notes	31-12-2023	31-12-2024
Assets			
Non-current assets:			
Tangible fixed assets	8	1,093,584	1,092,809
Investment properties	2.3.23	349	143
Intangible assets	9	1,207,946	1,145,612
Charges for contracts with clients	10	158,406	159,671
Rights of use	11	307,090	306,631
Investments in joint ventures and associates	12	29,440	37,650
Accounts receivable - other	13	4,364	3,911
Recoverable taxes	14	51	149
Other non-current financial assets	15	6,028	9,762
Deferred tax assets	16	81,906	66,255
Derivative financial instruments	17	5,583	2,484
Total non-current assets		**2,894,747**	**2,825,077**
Current assets:			
Inventories	18	48,215	41,236
Accounts receivable – trade receivables	19	340,780	331,461
Customer contract assets	20	47,011	31,696
Accounts receivable - other	13	38,594	58,833
Recoverable taxes	14	37,050	5,979
Deferred costs	21	44,425	55,610
Derivative financial instruments	17	-	811
Cash and cash equivalents	22	18,158	9,084
Total current assets		**574,233**	**534,710**
Total Assets		**3,468,980**	**3,359,787**

	Notes	31-12-2023	31-12-2024
Equity			
Share capital	23.1	855,168	855,168
Share premium	23.2	4,202	4,202
Own shares	23.3	(15,059)	(15,002)
Legal reserve	23.4	4,374	4,692
Other reserves	23.4	(41,578)	(41,738)
Net profit/ loss		180,995	272,259
Equity excluding non-controlling interests		**988,102**	**1,079,581**
Nom-controlling Interests	24	6,585	7,397
Total Equity		**994,687**	**1,086,978**
Liabilities			
Non-current liabilities:			
Borrowings	25	1,496,900	1,306,276
Provisions	26	80,154	83,867
Accounts payable - other	27	44,726	42,109
Taxes payable	14	44,009	41,311
Derivative financial instruments	17	1,036	-
Deferred tax liabilities	16	5,498	6,803
Total non-current liabilities		**1,672,323**	**1,480,366**
Current liabilities:			
Borrowings	25	237,069	241,954
Accounts payable - suppliers	28	243,991	190,158
Accounts payable - other	27	50,349	35,086
Taxes payable	14	23,213	59,048
Accruals	30	203,943	219,496
Deferred income	31	42,964	46,517
Derivative financial instruments	17	441	184
Total current liabilities		**801,970**	**792,443**
Total Liabilities		**2,474,293**	**2,272.809**
Total Equity and Liabilities		**3,468,980**	**3,359,787**

The accompanying notes forms an integral part of the consolidated statement of financial position as at 31 December 2024.

The Certified Accountant

The Board of Directors

Consolidated income statement by nature

For the years ended 31 December 2023 and 2024
(Amounts expressed in thousands of Euro)

	Notes	4Q 23	12M 23	4Q 24	12M 24
Revenue:					
Services rendered		370,273	1,451,987	393,022	1,529,704
Sales		36,844	116,277	44,903	131,881
Other income		7,226	29,190	10,092	34,678
	32	**414,343**	**1,597,454**	**448,017**	**1,696,263**
Costs, losses, and gains:					
Payroll	33	21,391	90,206	24,191	92,167
Direct costs	34	97,409	354,391	100,729	373,445
Cost of products sold	35	38,307	104,411	42,090	111,522
Marketing and advertising		18,059	38,960	8,543	34,220
Support services	36	24,052	91,634	20,651	87,921
External supplies and services	36	40,539	153,529	47,012	168,154
Other operating costs / (gains)		371	1,056	713	1,263
Indirect taxes		8,870	35,713	3,147	32,132
Provisions and adjustments	37	1,710	10,885	18,400	27,815
Depreciation, amortisation and impairment losses	8,9,10,11 and 38	123,784	483,638	122,923	498,842
Restructuring costs	39	2,378	3,605	9,646	11,337
Losses / (gains) on disposal of assets, net	8	(128)	(851)	(513)	(35,181)
Other non-recurring costs / (gains), net	40	(34,535)	(33,935)	(48,023)	(86,829)
		342,207	**1,333,242**	**349,509**	**1,316,808**
Profit/ loss before losses / (gains) in subsidiaries, financial results and taxes		**72,136**	**264,212**	**98,508**	**379,455**
Losses / (gains) in subsidiaries, net	12 and 41	(432)	(5,081)	(1,160)	(8,258)
Financing costs	42	19,703	65,293	13,228	70,017
Foreign exchange losses / (gains), net		149	88	(434)	(322)
Losses / (gains) on financial assets, net		22	217	(615)	(1,051)
Other financial costs / (income), net	42	868	3,607	889	3,537
		20,310	**64,124**	**11,908**	**63,923**
Profit before tax		**51,826**	**200,088**	**86,600**	**315,532**
Income tax	16	(3,096)	18,754	14,811	42,458
Net consolidated profit/ loss		**54,922**	**181,334**	**71,789**	**273,074**
Attributable to:					
Shareholders of the parent company	43	54,675	180,995	71,148	272,259
Non-controlling interests	24	247	339	641	815
Net profit/loss per share					
Basic - Euro	43	0.11	0.35	0.14	0.54
Diluted - Euro	43	0.11	0.35	0.14	0.54

The accompanying notes form an integral part of the consolidated income statement by nature for the year ended 31 December 2024.

The Certified Accountant

The Board of Directors

Consolidated statement of comprehensive income

For the years ended 31 December 2023 and 2024

(Amounts expressed in thousands of Euro)

	Notes	4Q 23	12M 23	4Q 24	12M 24
Consolidated net profit/ (loss)		**54,922**	**181,334**	**71,789**	**273,074**
Other income					
Items that could be reclassified through profit/(loss)::					
Changes in the comprehensive income of entities recognised using the equity method	12	(1,522)	(13,481)	2,493	(48)
Fair value of interest rate derivatives	17	(7,138)	(6,597)	(161)	(2,077)
Deferred tax - interest rate derivatives	17	1,606	1,484	36	467
Fair value of exchange rate derivatives	17	(617)	(114)	759	635
Deferred tax - exchange rate derivatives	17	172	33	(178)	(142)
Change in currency translation reserve and others		(30)	(368)	(99)	6
Income recognised directly in equity		**(7,529)**	**(19,043)**	**2,850**	**(1,159)**
Total comprehensive income		**47,393**	**162,291**	**74,639**	**271,915**
Attributable to:					
Shareholders of the parent company		47,146	161,952	73,998	271,100
Non-controlling interests	24	247	339	641	815
		47,393	**162,291**	**74,639**	**271,915**

The accompanying notes form an integral part of the consolidated statement of comprehensive income for the year ended 31 December 2024.

The Certified Accountant

The Board of Directors

Consolidated statement of changes in shareholder's equity

For the years ended 31 December 2023 and 2024

(Amounts expressed in thousands of Euro)

		Attributable to NOS group shareholders										
					Other reserves							
	Notes	Share capital	Share premium	Own shares	Legal reserve	Reserves for own shares	Reserves for medium-term incentive plans	Hedging reserves	Other reserves and retained earnings	Net profit/ loss	Non-controlling interests	Total
Balance as at 1 January 2023		**855,168**	**4,202**	**(15,968)**	**1,030**	**15,968**	**6,675**	**8,530**	**(54,087)**	**224,574**	**6,251**	**1,052,343**
Profit appropriation												
Transfer to bookings		-	-	-	3,344	-	-	-	221,230	(224,574)	-	-
Dividends paid	23.4	-	-	-	-	-	-	-	(219,987)	-	-	(219,987)
Acquisition of own shares	23.3	-	-	(5,171)	-	5,171	-	-	(5,171)	-	-	(5,171
Distribution of own shares under:												
Share plans	23.3	-	-	5,970	-	(5,970)	(4,670)	-	4,670	-	-	-
Other remunerations	23.3	-	-	110	-	(110)	-	-	117	-	-	117
Share plan - Costs recognised in the year and others	48	-	-	-	-	-	5,094	-	5	-	(5)	5,094
Comprehensive income for the year		-	-	-	-	-	-	(5,193)	(13,850)	180,995	339	162,291
Balance as at 31 December 2023		**855,168**	**4,202**	**(15,059)**	**4,374**	**15,059**	**7,099**	**3,337**	**(67,073)**	**180,995**	**6,585**	**994,687**
Balance as at 1st January 2024		**855,168**	**4,202**	**(15,059)**	**4,374**	**15,059**	**7,099**	**3,337**	**(67,073)**	**180,995**	**6,585**	**994,687**
Profit appropriation												
Transfer to reserves		-	-	-	318	-	-	-	180,677	(180,995)	-	-
Dividends paid	23.4	-	-	-	-	-			(178,958)	-	-	(178,958)
Acquisition of own shares	23.3	-	-	(4,261)	-	4,261	-	-	(4,261)	-	-	(4,261)
Distribution of own shares under:												
Share plans	23.3	-	-	4,197	-	(4,197)	(3,277)	-	3,277	-	-	-
Other remunerations	23.3	-	-	121	-	(121)	-	-	113	-	-	113
Share plans – Plan costs settled in cash	48	-	-	-	-	-	(1,180)	-	-	-	-	(1,180)
Share plans - Costs recognised in the year and others	48	-	-	-	-	-	4,662	-	3	-	(3)	4,662
Comprehensive income for the year		-	-	-	-	-	-	(1,117)	(42)	272,259	815	271,915
Balance as at 31 December 2024		**855,168**	**4,202**	**(15,002)**	**4,692**	**15,002**	**7,304**	**2,220**	**(66,264)**	**272,259**	**7,397**	**1,086,978**

The accompanying notes form an integral part of the consolidated statement of changes in equity for the year ended 31 December 2024.

The Certified Accountant

The Board of Directors

Consolidated cash flow statement

For the years ended 31 December 2023 and 2024

(Amounts expressed in thousands of Euro)

	Notes	12M 23	12M 24
Operational activities			
Receipts from customers		1,836,611	2,051,007
Payments to suppliers		(895,357)	(973,694)
Payments to staff		(118,306)	(124,709)
Receipts/(payments) related to income tax		(58,496)	27,648
Other receipts/(payments) relating to operating activities		(35,742)	(76,897)
Flows from operating activities (1)		**728,710**	**903,355**
Investment activities			
Receipts from			
Financial investments		1,150	1,342
Tangible fixed assets		1,562	71,532
Interest and similar income		7,300	10,822
		10,012	**83,696**
Payments relating to			
Financial investments	15	(1,629)	(2,690)
Borrowings		(129)	-
Tangible fixed assets		(231,616)	(213,237)
Intangible assets and Charges for contracts with customers		(218,876)	(244,538)
		(452,250)	**(460,465)**
Flows from investing activities (2)		**(442,238)**	**(376,769)**
Financing activities			
Receipts from			
Borrowings	25	700,200	332,200
Dividends		622	3
		700,822	**332,203**
Payments relating to			
Borrowins	25	(606,600)	(507,300)
Amortisation of lease contracts	25	(105,796)	(89,206)
Interest and similar costs	25	(49,327)	(78,828)
Dividends	45.3	(219,987)	(178,958)
Acquisition of own shares	23.3	(5,171)	(4,261)
		(986,881)	**(858,553)**
Flows from financing activities (3)		**(286,059)**	**(526,350)**
Changes in cash and cash equivalents (4)=(1)+(2)+(3)		413	236
Effect of exchange rate differences		(2)	(2)
Cash and cash equivalents, net of bank overdrafts at the beginning of the period		8,079	8,490
Cash and cash equivalents, net of bank overdrafts at the end of the period	**22**	**8,490**	**8,724**

The accompanying notes form an integral part of the consolidated cash flow statement for the year ended 31 December 2024.

The Certified Accountant

The Board of Directors

Notes to the Consolidated Financial Statements

As at 31 December 2024

(Amounts expressed in thousands of Euro, except where indicated)

1. Introductory Note

NOS, SGPS, S.A. ("NOS", "NOS SGPS" or "Company"), whose name has not changed during the year, was formerly known as ZON OPTIMUS, SGPS, S.A. ("ZON OPTIMUS") and until 27 August 2013 as ZON Multimédia - Serviços de Telecomunicações e Multimédia, SGPS, S.A. ("ZON") ("ZON"), currently with registered offices at Rua Actor António Silva, nº 9, Campo Grande, was incorporated by Portugal Telecom, SGPS, S.A. ("Portugal Telecom") on 15 July 1999 with the aim of developing its multimedia business strategy through it.

During 2007, Portugal Telecom carried out the spinoff of ZON, with the attribution of its stake in this company to its shareholders, which became totally independent from Portugal Telecom.

During 2013, ZON and Optimus, SGPS, S.A. ("Optimus SGPS") completed a merger by incorporation of Optimus SGPS into ZON, with the Company adopting the name ZON OPTIMUS, SGPS, S.A. on that date.

On 20 June 2014, as a result of the launch of the new "NOS" brand on 16 May 2014, the General Meeting approved the change in the Company's name to NOS, SGPS, S.A.

The businesses operated by NOS and its subsidiaries ("Group" or "NOS Group") include cable and satellite television services, voice services and Internet access, the publishing and sale of video grams, advertising on pay-TV channels, the operation of cinemas, the distribution of films, the production of pay-TV channels, datacentre management, licensing and the provision of engineering and consultancy services in the area of information systems, predominantly in the Portuguese market.

The shares representing the capital of NOS are listed on the stock exchange Euronext - Lisbon. The Group's shareholder structure as at 31 December 2024 is shown in Note 23.1.

The activities of NOS Comunicações ("NOS SA") and its subsidiaries, NOS Technology, NOS Açores, NOS Madeira, NOS Wholesale, NOS Sistemas comprise: a) the distribution of television signals by cable and satellite; b) the operation of a state-of-the-art GSM/UMTS/LTE/5G mobile communications network; c) the operation of electronic communications services, including data communication and multimedia services in general; d) voice over internet protocol ("VOIP") services; e) mobile virtual network operator ("MVNO"); f) the provision of advisory, consultancy and related services, directly or indirectly related to the above activities and services; and g) data centre management and the provision of consultancy services in the area of information systems. The activity of these companies is regulated by Law no. 16/2022 (Electronic Communications Law), which establishes the regime applicable to electronic communications networks and services.

NOS Audio - Sales and Distribution, formerly NOS Lusomundo TV and the result of the merger of NOSPUB into NOS Lusomundo TV in December 2020, has as its main activity the negotiation, purchase and distribution of content rights and other multimedia products for television and other distribution platforms, currently producing cinema channels and series through the compilation of acquired content, which are distributed, among other operators, by NOS SA and its subsidiaries. This company also manages the advertising space of pay-TV channels and NOS Cinemas cinemas.

NOS Audiovisuais and NOS Cinemas, as well as their subsidiaries, are active in the audiovisual sector, which includes publishing and selling videograms, distributing films, operating cinemas and acquiring/negotiating rights for pay-TV and VOD (video-on-demand).

NOS Inovação main activities are to carry out and stimulate scientific research and development activities (it holds all the intellectual property developed within the NOS group, with the aim of guaranteeing a return on the initial investment through the commercialisation of patents and commercial exploitation concessions resulting from the process of creating products and services), demonstration, dissemination, technology transfer and training in the fields of information services and systems and state-of-the-art fixed and mobile television, internet, voice and data solutions.

The notes in this annex follow the order in which the items are presented in the consolidated financial statements.

The consolidated financial statements for the year ended 31 December 2024 were approved by the Board of Directors and authorised for issue on 26 February 2025.

They are also subject to approval by the General Shareholders' Meeting, under the terms of the commercial legislation in force in Portugal.

The Board of Directors believes that these financial statements give a true and fair view of the Group's operations, financial performance, and consolidated cash flows.

2. Accounting policies

The main accounting policies applied in preparing the financial statements are described below. These policies have been consistently applied to all financial years presented, unless otherwise stated.

2.1. Basis of preparation

The consolidated financial statements of NOS have been prepared in accordance with International Financial Reporting Standards ("IAS/IFRS") issued by the International Accounting Standards Board ("IASB") and Interpretations issued by the International Financial Reporting Interpretations Committee ("IFRIC") or by the former Standing Interpretations Committee ("SIC"), adopted by the European Union, effective on 1 January 2024.

The consolidated financial statements are presented in Euros as this is the main currency of the Group's operations and all figures are presented in thousands of euros, unless otherwise stated. The financial statements of subsidiaries with another main currency have been converted into Euros in accordance with the accounting policies described in Note 2.3.21.

The consolidated financial statements have been prepared on a going concern basis from the accounting books and records of the companies included in the consolidation (Appendix A) and under the historical cost convention, modified, where applicable, by the valuation of financial assets and liabilities (including derivatives) at fair value (Note 2.3.24).

In preparing the consolidated financial statements in accordance with IFRS, the Board of Directors used estimates, assumptions, and critical judgements with an impact on the value of assets and liabilities and the recognition of income and expenses for each reporting period. Although these estimates are based on the best information available at the date of preparation of the consolidated financial statements, current and future results may differ from these estimates. The areas involving a greater degree of judgement and estimates are presented in Note 3.

The Board of Directors considers that there are no material uncertainties that could jeopardise the going concern assumption, despite current liabilities being higher than current assets. An analysis was carried out and it was concluded that the Group has the necessary resources to continue its operations for the future, for a period of no less than 12 months from the reporting date.

The NOS Group, in the preparation and presentation of the consolidated financial statements, declares that it complies, explicitly and without reservation, with the IAS/IFRS standards and their SIC/IFRIC interpretations, approved by the European Union.

Changes in accounting policies and disclosures

The following standards, interpretations, amendments, and revisions endorsed by the European Union have mandatory application for the first time in the financial year beginning on 1 January 2024:

- Amendments to IAS 1 - Presentation of financial statements - Classification of current and non-current liabilities. On 23 January 2020, the IASB issued an amendment to IAS 1 Presentation of Financial Statements. This amendment aims to clarify the classification of liabilities as current or non-current balances depending on the rights an entity must defer their payment at the end of each reporting period. The amendments aim to
    - specify that an entity's right to defer settlement must exist at the end of the reporting period and must be substantive;
    - clarify that the ratios that the company must fulfil after the balance sheet date (e.g. future ratios) do not affect the classification of a liability on the balance sheet date. However, when non-current liabilities are subject to future ratios, companies must disclose information that allows users to understand the risk that these liabilities may be repaid within 12 months of the balance sheet date; and
    - clarify the requirements for classifying liabilities that an entity will settle, or can settle, by issuing its own equity instruments (e.g. convertible debt).
- Amendment to IAS 7 and IFRS 7 - Disclosures: Supplier financing arrangements. These amendments to IAS 7 Statement of Cash Flows and IFRS 7 Financial Instruments: Disclosures, aim to clarify the characteristics of a supplier financing arrangement and introduce additional disclosure requirements when such arrangements exist. The disclosure requirements are intended to help users of financial statements understand the effects of supplier financing arrangements on the entity's liabilities, cash flows and exposure to liquidity risk. The changes come into force for the period beginning on or after 1 January

2024. The new requirements complement those already included in the IFRS standards and include disclosures on:

- terms and conditions of supplier financing agreements;
- the amounts of the liabilities that are the subject of such agreements, the extent to which suppliers have already received payments from the lenders and the heading under which these liabilities are presented in the balance sheet;
- the due date ranges; and
- information on liquidity risk.

- Amendments to IFRS 16 - Leases - Lease liabilities in a sale and leaseback transaction. This amendment to IFRS 16 introduces guidance on the subsequent measurement of lease liabilities related to sale and leaseback transactions that qualify as a "sale" in accordance with the principles of IFRS 15, with a greater impact when some or all the lease payments are variable lease payments that do not depend on an index or a rate. The amendments confirm that:
  - on initial recognition, the seller - lessee includes variable lease payments when measuring a lease liability arising from a sale and leaseback transaction.
  - after initial recognition, the seller - lessee applies the general requirements for subsequent accounting of the lease liability, so that it does not recognise any gain or loss related to the right of use it retains.

  A seller-lessee may adopt different approaches that satisfy the new subsequent measurement requirements. On initial recognition, the seller-lessee includes variable lease payments when measuring a lease liability arising from a sale and leaseback transaction. When subsequently measuring lease liabilities, seller-lessees should determine "lease payments" and "revised lease payments" in such a way that they do not recognise gains/(losses) in respect of the right of use they retain. A seller-lessee may adopt different approaches that fulfil the new subsequent measurement requirements. This amendment is retrospective.

  In accordance with IAS 8 - Accounting Policies, Changes in Accounting Estimates and Errors, a seller - lessee will have to apply the changes retrospectively to sale and leaseback transactions entered into since the date of initial application of IFRS 16. This means that it will have to identify and re-analyse sale and leaseback transactions entered since the implementation of IFRS 16 in 2019 and potentially restate those that included variable lease payments.

These standards and amendments had no material impact on the Group's consolidated financial statements.

The following standards, interpretations, amendments, and revisions, with mandatory application in future financial years, have been endorsed by the European Union up to the date of approval of these financial statements:

- Amendments to IAS 21 - The Effects of Changes in Foreign Exchange Rates: Lack of Convertibility The amendments clarify how an entity should assess whether a currency is convertible or not and how it should determine a spot exchange rate in situations of lack of convertibility. A currency is convertible into another currency when an entity can exchange that currency for another currency on the measurement date and for a specific purpose. When a currency is not convertible, the entity must estimate a spot exchange rate.

According to the amendments, entities will have to provide new disclosures to help users assess the impact of using an estimated exchange rate in the financial statements. These disclosures may include:

- the nature and financial impacts of the currency not being convertible;
- the spot exchange rate used;
- the estimation process; and
- the risks for the company because the currency is not convertible;

The changes apply to annual reporting periods beginning on or after 1 January 2025. Early application is permitted.

This amendment was not applied in advance by the Group in the year ended 31 December 2024. The Group is analysing the possible impacts arising from the application of the amendment and no significant impacts are estimated.

The following standards, interpretations, amendments and revisions, with mandatory application in the financial year and in future financial years, have not been endorsed by the European Union as of the date of approval of these financial statements:

- Annual Improvements - Volume 11 - The changes impact the following standards:
  - IFRS 1 First-time adoption of International Financial Reporting Standards - Hedge accounting by a first-time adopter;
  - IFRS 7 Financial Instruments: Disclosures and the respective Implementation Guide, in order to clarify:

    the application guide, regarding Gain and loss on derecognition;

    and

    the implementation guide, namely its Introduction, Fair Value paragraph (disclosures regarding the difference between fair value and transaction price) and Credit Risk disclosure.
  - IFRS 9 Financial Instruments
    - o derecognition of lease liabilities;
    - o transaction price;
  - IFRS 10 Consolidated Financial Statements - Determination of a 'de facto agent';
  - IAS 7 Statement of Cash Flows - Cost Method.

  The amendments apply to annual reporting periods beginning on or after 1 January 2026. Early application is permitted.
- IFRS 18 - Presentation and Disclosure of Financial Statements. This standard will replace IAS 1 Presentation of Financial Statements and aims to improve comparability and increase transparency. The main changes introduced by this standard are:

- promotes a more structured income statement. It introduces a new subtotal "operating profit" (as well as its definition) and the requirement that all income and expenses be classified into three new distinct categories based on a company's main business activities: Operating, Investment and Financing.
- requirement for companies to analyse their operating expenses directly on the face of the income statement - either by nature, by function or in a mixed way.
- requirement for some of the 'non-GAAP' measures that the Group uses to be reported in the financial statements. The standard defines non-GAAP performance measures as a subtotal of income and expenses that:
  - o are used in public communications outside the financial statements; and
  - o communicate management's view of financial performance

  for each MPM presented, companies will need to explain in a single note in the financial statements why the measure provides useful information, how it is calculated, and reconcile it with a value determined in accordance with IFRS.
- introduction of improved guidance on how companies group information in financial statements. It includes guidance on whether material information is included in the primary financial statements or is more detailed in the notes. The standard applies to annual reporting periods beginning on or after 1 January 2027 and applies retrospectively. Early application is permitted.

- IFRS 19 - Subsidiaries without Public Responsibility: Disclosures. This standard allows eligible subsidiaries to choose to apply the reduced disclosure requirements of IFRS 19, while continuing to apply the recognition, measurement, and presentation requirements of other IFRS accounting standards. Application of the standard is optional for eligible subsidiaries. An entity that applies IFRS 19 is required to disclose that fact as part of its general statement of compliance with IFRS accounting standards. A subsidiary may choose to apply the new standard in its consolidated, individual, or separate financial statements, provided that, at the reporting date:
  - no public accountability;
  - its parent company prepares consolidated financial statements in accordance with IFRS.

  A subsidiary that applies IFRS 19 is required to state clearly in its explicit and unconditional statement of compliance with IFRS that IFRS 19 has been adopted.

  The standard applies to annual reporting periods beginning on or after 1 January 2027 and is applied retrospectively. Early application is permitted.

- Amendments to IFRS 9 and IFRS 7 - Amendments to the classification and measurement of financial instruments - The amendments:
  - clarify the classification of financial assets with environmental, social, and corporate governance (ESG) characteristics and similar since these characteristics in loans can affect whether loans are measured at amortised cost or fair value. To resolve any potential diversity in practical application, the amendments clarify how the contractual cash flows of loans should be valued.

- clarify the date on which a financial asset or financial liability is derecognised when it is settled through electronic payment systems. There is an accounting policy option that allows a financial liability to be derecognised before the cash is delivered on the settlement date if certain criteria are met.

- improving the description of the term "non-recourse", according to the amendments, a financial asset has non-recourse characteristics if the ultimate right to receive cash flows from an entity is contractually limited to the cash flows generated by specific assets. The presence of non-recourse characteristics does not necessarily exclude the financial asset from complying with the SPPI, but its characteristics need to be carefully analysed.

- clarify that a linked instrument must have a cascading payment structure that creates a concentration of credit risk by allocating losses disproportionately between different tranches. The underlying pool may include financial instruments that are not within the scope of IFRS 9 classification and measurement (e.g. finance leases), but must have cash flows equivalent to the SPPI criterion.

The IASB also introduced additional disclosure requirements relating to equity investments designated at fair value through other comprehensive income and financial instruments with contingent features, for example features linked to ESG targets. The standard applies to annual reporting periods beginning on or after 1 January 2026 and applies retrospectively. Early application is permitted.

- Amendments to IFRS 9 and IFRS 7 - Amendments to Contracts Referencing Nature-Dependent Electricity: On 18 December 2024, the International Accounting Standards Board (IASB) issued amendments to help companies better report the financial effects of nature-dependent electricity contracts, which are often structured as power purchase agreements (PPAs).

  Nature-dependent electricity contracts help companies secure their electricity supply from sources such as wind and solar power. The amount of electricity generated under these contracts can vary depending on non-controllable factors such as weather conditions. Current accounting requirements may not adequately reflect how these contracts affect a company's performance.

  To enable companies to better reflect these contracts in their financial statements, the IASB has made specific amendments to IFRS 9 Financial Instruments and IFRS 7 Financial Instruments: Disclosures. The amendments include:

  - clarification of the application of "own use" requirements;

  - allowance for hedge accounting if these contracts are used as hedging instruments; and

  - add new disclosure requirements to allow investors to understand the effect of these contracts on a company's financial performance and cash flows.

  These amendments are effective for periods beginning on or after 1 January 2026. Early adoption is permitted.

These standards/amendments have not yet been endorsed by the European Union and, as such, were not applied by the Group during the year ended 31 December 2024. The Group is analysing the possible impacts of applying these new standards/amendments.

2.2. Consolidation Bases

Controlled companies

Subsidiaries were consolidated using the full consolidation method. Control over an entity is considered to exist when the Group is exposed and/or entitled, as a result of its involvement, to the variable return of the entity's activities, and has the ability to affect that return through the power exercised over the entity. In particular, when the Company directly or indirectly holds the majority of the voting rights at the General Meeting or has the power to determine financial and operating policies. In situations where the Company has substantial control over other entities created for a specific purpose, even if it does not directly hold equity stakes in these entities, they are consolidated using the full consolidation method. The entities in these situations are listed in Appendix A.

Third parties' holdings in the equity and net profit of these companies are shown separately in the consolidated statement of financial position and the consolidated income statement, respectively, under "Non-controlling interests" (Note 24).

The identifiable assets acquired, and the liabilities and contingent liabilities assumed in a business combination are initially measured at fair value on the acquisition date, regardless of the existence of non-controlling interests. The excess of the acquisition cost over the fair value of the Group's share of the identifiable assets and liabilities acquired is recognised as goodwill. In cases where the acquisition cost is lower than the fair value of the net assets identified, the difference is recognised as a gain in the income statement for the year in which the acquisition takes place.

Non-controlling interests are initially recognised at the respective proportion of the fair value of the assets and liabilities identified.

When additional shares are acquired in companies already controlled by the Group, the difference between the percentage of capital acquired and the respective acquisition price is recognised directly in equity.

Whenever an increase in the share capital of an associated company results in the acquisition of control, which is then included in the consolidated financial statements using the full consolidation method, the fair values of the percentages previously held are considered as part of the purchase price, and the difference between the book value of the holding in the associated company and the fair value is recognised in the income statement.

Directly attributable transaction costs are immediately recognised in the income statement.

When the Group loses control over a controlled entity, the assets and liabilities of that entity are derecognised, along with any non-controlling interests and other components recognised in equity. Any resulting gain or loss is recognised in the income statement. Any interest retained in the entity is measured at fair value when control is lost.

The results of companies acquired or sold during the year are included in the income statements from the date of obtaining control or until the date of disposal, respectively.

Internal transactions, balances, unrealised gains on transactions and dividends distributed between Group companies are eliminated. Unrealised losses are also eliminated unless the transaction reveals evidence of impairment of a transferred asset.

Whenever necessary, adjustments are made to the financial statements of subsidiaries in order to standardise their accounting policies with those of the Group.

Jointly controlled companies

The classification of financial investments in jointly controlled companies is determined based on the existence of shareholders' agreements that demonstrate and regulate joint control. Investments in jointly controlled companies are accounted for using the equity method (Appendix C). In accordance with this method, the financial holdings are periodically adjusted by the amount corresponding to the share in the net results of the jointly controlled companies, against the item "Losses / (gains) in subsidiaries, net" in the income statement. Direct changes in equity following the acquisition of jointly controlled companies are recognised in the amount of the holding against the caption "Reserves" in equity.

In addition, financial holdings may also be adjusted by recognising impairment losses.

Any excess of the acquisition cost over the fair value of the identifiable net assets and liabilities (goodwill) is recorded as part of the financial investment in jointly controlled companies, and the investment is tested for impairment when there are indicators of loss of value. In cases where the acquisition cost is lower than the fair value of the net assets identified, the difference is recognised as a gain in the income statement for the year in which the acquisition takes place.

Losses in jointly controlled companies that exceed the investment made in those entities are not recognised, except when the Group has assumed commitments towards that entity.

Dividends received from these companies are recognised as a decrease in the value of financial investments.

Associated companies

An associate is an entity over which the Group exercises significant influence, through participation in decisions relating to its financial and operating policies, but does not have control or joint control.

Any excess of the acquisition cost of a financial investment over the fair value of the identifiable net assets is recorded as goodwill and added to the value of the respective financial investment and its recovery is analysed within the scope of the financial investment in the associate whenever there are indications of a possible loss of value. In cases where the acquisition cost is lower than the fair value of the identifiable net assets, the difference is recognised as a gain in the income statement for the period in which the acquisition takes place.

Financial investments in associated companies (Appendix B) are recorded using the equity method, except for associated companies held directly or indirectly through a venture capital organisation. In accordance with this method, financial investments are periodically adjusted by the amount corresponding to the share in the net results of associated companies, against the item "Losses / (gains) in associated companies, net" in the income statement. Direct changes in equity following the acquisition of associates are recognised in the value of the holding against the reserves heading in equity. In addition, financial holdings may also be adjusted by recognising impairment losses.

The Group's investments in associated companies, held directly or indirectly through a venture capital organisation, are measured at fair value through profit or loss. These investments are shown under the heading "Other non-current financial assets" in the statement of financial position and changes in fair value are recorded against the heading "Losses / (gains) on financial assets, net" in the income statement.

Losses in associates that exceed the investment made in those entities are not recognised, except when the Group has assumed commitments towards that associate.

Dividends received from these companies are recognised as a decrease in the value of financial investments.

Holdings in entities without significant influence

Investments made by the Group in entities where it does not exercise significant influence are measured at fair value through profit or loss.

These investments are shown under "Other non-current financial assets" in the statement of financial position and changes in fair value are recognised under "Losses / (gains) on financial assets, net" in the income statement.

Balances and transactions between Group companies

Balances and transactions, as well as unrealised gains, between Group companies and between these and the parent company are eliminated on consolidation.

Unrealised gains arising from transactions with associated companies or jointly controlled companies are eliminated in consolidation to the extent attributable to the Group. Unrealised losses are likewise eliminated unless they provide evidence of impairment of the transferred asset.

2.3. Accounting Policies

2.3.1. Segment reports

As recommended by IFRS 8, the Group presents its operating segments based on internally produced management information (Note 6). In fact, the operating segments are reported in a manner consistent with the internal management information model provided to the Group's chief operating decision maker, who is responsible for allocating resources to the segment and assessing its performance, as well as making strategic decisions.

2.3.2. Classification of the statement of financial position and income statement

The Group presents assets and liabilities in the statement of financial position based on their classification as current or non-current. An asset is classified as current when:

- the asset is expected to be realised, or is intended to be sold or consumed, in the normal course of its operating cycle;
- if you hold the asset primarily for trading purposes;
- the asset is expected to be realised within 12 months of the reporting period;
- the asset is cash or a cash equivalent unless it is restricted from being exchanged or used to settle a liability for at least 12 months after the reporting period.

A liability is classified as current when:

- the liability is expected to be settled in the normal course of its operating cycle;
- the liability is held primarily for trading purposes;

- the settlement of the liability is expected to take place within 12 months of the reporting period;
- does not have the right, at the end of the reporting period, to defer settlement of the liability for at least twelve months after the reporting period.

The Group's other assets and liabilities are classified as non-current.

Realisable assets and liabilities due within one year of the statement of financial position date are classified under current assets and current liabilities, respectively.

In accordance with IAS 1, "Restructuring costs", "Losses / (gains) on disposal of assets, net" and "Other non-recurring costs / (gains), net" reflect unusual costs and revenues that should be reported separately from the usual cost and revenue lines, in order to avoid distorting the financial information of regular operations, and to be consistent with the way in which the group's financial performance is analysed and monitored by management. These unusual costs and revenues may not be comparable to similarly titled measures used by other companies. When determining whether an event or transaction is unusual, management considers both quantitative and qualitative factors. Examples of unusual costs and revenues are: business restructuring programmes and respective compensation; regulatory matters and lawsuits; extraordinary impairments of assets due to reduction in their recoverable value, disposal of non-current assets, among others. If costs and revenues fulfil these criteria, which are applied consistently from year to year, they are treated as unusual and presented in the specific lines above.

2.3.3. Tangible fixed assets

Tangible fixed assets are stated at acquisition cost, less depreciation and accumulated impairment losses, where applicable. The acquisition cost includes, in addition to the purchase price of the asset: (i) the expenses directly attributable to the purchase; and (ii) the estimated costs of dismantling, removing the assets and requalifying the site, which in the Group is mainly applicable to the business of operating cinemas, telecommunications towers and offices (Note 8).

Estimated losses arising from the replacement of equipment before the end of its useful life, for reasons of technological obsolescence, are recognised as a deduction from the respective asset against profit or loss for the period. Maintenance and repair costs of a current nature are recognised as a cost when incurred. Significant costs incurred in renewing or improving assets are capitalised and depreciated over the corresponding estimated period of recovery of these investments, when it is probable that there will be future economic benefits associated with the asset and when these can be reliably measured.

Gains and losses on disposals of tangible fixed assets, determined by the difference between the sale price and the respective net book value, are recognised in the income statement under "Losses / (gains) on disposals of assets, net".

Depreciation

Tangible fixed assets are depreciated from the moment they are ready for use. These assets, less their residual value, are depreciated on a straight-line basis, in twelfths, from the month in which they are available for use, in accordance with the useful life of the assets, defined according to their expected usefulness.

The depreciation rates applied translate into the following estimated useful lives:

	2023 (Years)	2024 (Years)
Buildings and other constructions	2 to 50	2 to 50
Basic equipment:		
Network equipment	7 to 40	8 to 40
Terminal equipment	1 to 5	1 to 5
Other basic equipment	1 to 16	1 to 16
Transport equipment	3 to 4	3 to 4
Administrative equipment	2 to 10	2 to 10
Other tangible fixed assets	4 to 8	4 to 8

During the year ended 31 December 2024, the depreciation rates used did not change.

2.3.4. Non-current assets held for sale and discontinued operations

Non-current assets (or discontinued operations) are classified as held for sale if their value is realisable through a sale transaction rather than through their continued use.

This situation is considered to occur only when: (i) the sale is highly probable, and the asset is available for immediate sale in its current condition; (ii) the Group has made a commitment to sell; and (iii) the sale is expected to materialise within 12 months. In this case, non-current assets are measured at the lower of book value or fair value less costs to sell.

Non-current assets held for sale and discontinued operations are measured at the lower of: i) the carrying amount and; ii) the fair value less costs to sell. Costs to sell are the incremental costs directly attributable to the disposal of an asset (or disposal group), excluding financing costs and income tax expenses.

Once certain property, plant and equipment are considered to be "held for sale", the depreciation inherent to these assets ceases and they are classified as non-current assets held for sale.

A discontinued operation is a component of an entity that has either been disposed of or is classified as held for sale e:

- It represents an important line of business or geographical area separated from operating units;
- It is an integral part of a single co-ordinated plan to divest a major business line or separate geographical area of separate operating units or;
- It is a subsidiary acquired exclusively with a view to resale.

Discontinued operations are excluded from the profit or loss of continuing operations and are presented separately as an amount of net profit after tax derived from discontinued operations in the income statement.

2.3.5. Intangible assets

Intangible assets are recorded at acquisition cost, less accumulated amortisation and accumulated impairment losses, when applicable. They are only recognised when they give rise to future economic benefits for the Group and when these can be measured reliably.

Intangible assets are essentially made up of goodwill, telecommunications licences, software, rights to use content and other contractual rights.

Group companies periodically carry out an impairment assessment of intangible assets in progress. This impairment assessment is also performed whenever an event or change in circumstances is identified which indicates that the amount for which the asset is recognised may not be recovered. If there are such indications, the Group determines the asset's recoverable value in order to determine the existence and extent of the impairment loss.

Goodwill

Goodwill represents the excess of the acquisition cost over the net fair value of the identifiable assets, liabilities and contingent liabilities of a subsidiary, jointly controlled entity, or associate on the respective acquisition date, in accordance with IFRS 3.

Goodwill is recorded as an asset and included under "Intangible assets" (Note 9), in the case of a controlled company or if the excess cost originates from an acquisition by merger, and under "Investments in joint ventures and associates" (Note 12), in the case of a jointly controlled entity or associated company.

Goodwill is not amortised but is subject to impairment tests at least once a year, on a specific date, and whenever there are changes to the assumptions underlying the test carried out at the statement of financial position date, which result in a possible loss of value. Any impairment loss is recorded immediately in the income statement for the period under "Depreciation, amortisation and impairment losses" and cannot be reversed later.

For the purposes of carrying out impairment tests, goodwill is attributed to the cash-generating units to which it relates (Note 9), which may correspond to the business segments in which the Group operates or at a lower level.

Internally developed intangible assets

Internally developed intangible assets, namely research expenses, are recognised as costs when incurred. Development costs are only recognised as an asset to the extent that the technical capacity to complete the intangible asset is demonstrated and that it is available for use or commercialisation.

Industrial property and other rights

The assets classified under this heading refer to rights and licences contractually acquired by the Group from third parties and used in the development of the Group's activities, and include:

- telecommunication licences;
- software licences;
- content exploitation rights;
- other contractual rights.

Software-as-a-Service (*SaaS*) agreements are service contracts in which NOS has the right to access a particular *Cloud* application/software for a specified period of time, contracted with the supplier. The costs incurred configuration, customisation and ongoing access to the *Cloud* application/software are recognised as operating expenses when the services are received

Costs incurred with the development, improvement or modification of existing NOS applications/software, even if interconnected with *SaaS* agreements, and which fulfil the recognition criteria, are recorded as intangible assets.

Content exploitation rights are recognised in the statement of financial position as an intangible asset whenever the following conditions are met: (i) there is control over the content, (ii) the company has the right to choose how to exploit this content and (iii) it is available for exhibition.

The conclusion of contracts related to sports content that is not immediately available gives rise to rights that are initially classified as contractual commitments.

In the specific case of broadcasting rights for sports competitions, and once the conditions have been met for them to be recognised as intangible assets, they are recognised as assets when the necessary conditions have been met for the organisation of each sports competition, which occurs on the date of approval of the teams participating in the competition to be held in the sports season to be started, by the organising entity, taking into account that it is from this date that the conditions for the recognition of an asset are met, namely the unequivocal obtaining of control of the rights to exploit the matches of that season. In this situation, the depreciation of these rights is recognised in the income statement under "Depreciation, amortisation and impairment losses", using the straight-line method, in twelfths, from the start of the month in which they are available for use.

As a result of agreements reached for the transfer of exclusive rights to exploit sports content, and as permitted by IAS 1, since 2017 NOS has presented assets and liabilities net of the amounts transferred to other operators, as it believes that this compensation better reflects the substance of the transactions.

Whenever the intangible assets recognised involve payments over periods of more than 1 year, the intangible asset corresponds to the present value of these payments.

Depreciation

The useful lives of intangible assets are classified as defined or indefinite.

Intangible assets that have defined useful lives are amortised over their useful life, and an impairment analysis is performed whenever there are indications that the amount for which the intangible asset is recorded may not be recovered. The amortisation period and amortisation method of an intangible asset with a defined useful life are reviewed periodically. Any changes in the expected useful life or in the expected pattern of future consumption of the economic benefits embodied in the asset are considered when modifying the amortisation period or method and, if verified, are treated as changes in accounting estimates. The amortisation costs of intangible assets with defined lives are recognised in the income statement.

Assets with a defined useful life are amortised on a straight-line basis, in twelfths, from the beginning of the month in which they are available for use.

The amortisation rates used translate into the following estimated useful lives:

	2023 (Years)	2024 (Years)
Telecoms licences	20 to 33	20 to 33
Software licences	1 to 8	1 to 8
Rights to use content	Contract period	Contract period
Other contractual rights	1 to 20	1 to 20

During the year ended 31 December 2024, NOS revised the amortisation rates most software acquired and developed internally, reducing the useful life from 6 to 3 years, resulting in an increase in Depreciation, amortisation and impairment losses (Intangible assets) in the amount of Euro 44 million (Note 38).

Intangible assets with indefinite useful lives are not amortised, but impairment tests are performed annually.

Thus, the useful life of an intangible asset that is not being amortised is reviewed periodically to determine whether events and circumstances continue to support an indefinite useful life assessment for that asset. If this is not the case, the change in the assessment of the useful life from indefinite to finite is accounted for as a change in an accounting estimate.

An intangible asset is derecognised when it is disposed of, or when no future economic benefits are expected from its use or disposal. The gain or loss arising from the derecognition of an intangible asset (determined as the difference between the net disposal proceeds, if any, and the carrying amount of that asset) is recognised in the income statement

2.3.6. Charges for contracts with clients

Charges for contracts with customers correspond to costs incurred in attracting customers and costs associated with fulfilling a contract which are capitalised whenever they meet all the following criteria:

- are related to an existing contract or a specific future contract;
- generate or increase resources that will be used in the future;
- the costs are expected to be recovered; and
- are not already covered by the scope of another standard, such as inventories, tangible or intangible assets.

These costs are recognised over the expected period of service to customers (2 to 4 years).

The costs of customer acquisition are essentially

- commissions paid to third parties for new contracts/new clients;
- commissions paid to third parties for upgraded services;
- commissions paid to third parties for customer loyalty services and offers; and
- several revenue-raising commissions.

- the costs associated with the fulfilment of contracts are essentially:
- costs incurred with the portability of mobile/fixed numbers from other operators;
- variable costs incurred in activating the services contracted by customers.

2.3.7. Impairment of non-current assets, excluding goodwill

Group companies periodically assess the impairment of non-current assets. This impairment assessment is also carried out whenever an event or change in circumstances is identified which indicates that the amount for which the asset is recognised may not be recovered. If there are such indications, the Group determines the asset's recoverable value in order to determine the existence and extent of the impairment loss.

The recoverable amount is estimated for each asset individually or, if this is not possible, the assets are grouped to the lowest levels for which there are identifiable cash flows for the cash-generating unit to which the asset belongs. Each of the Group's businesses constitutes a cash-generating unit, except for some of the cinema exhibition assets, which are grouped by regional cash-generating units.

The recoverable amount is determined by the higher of the net selling price and the value in use. The net selling price is the amount that would be obtained from the disposal of the asset in a transaction between independent and knowledgeable entities, less the costs directly attributable to the disposal. Value in use is the present value of the estimated future cash flows arising from the continued use of the asset or cash-generating unit. Whenever the carrying amount of an asset exceeds its recoverable amount, an impairment loss is recognised.

The reversal of impairment losses recognised in previous years is recorded when there are indications that those losses no longer exist or have decreased. The reversal of impairment losses is recognised in the income statement in the year in which it occurs. However, an impairment loss can only be reversed up to the amount that would have been recognised (net of amortisation or depreciation) if the impairment loss had not been recognised in previous years.

2.3.8. Financial assets

Financial assets are recognised in the Group's statement of financial position on the trade or contract date, which is the date on which the Group undertakes to acquire or dispose of the asset.

At inception, except for trade receivables, financial assets are recognised at fair value plus directly attributable transaction costs, except for assets at fair value through profit or loss where transaction costs are immediately recognised in profit or loss. Trade receivables are initially recognised at their transaction price, as defined by IFRS 15.

Financial assets are derecognised when:

- the Group's contractual rights to receive its cash flows expire;
- the Group has transferred substantially all the risks and rewards associated with its ownership; or
- although it retains part, but not substantially all, of the risks and rewards associated with their ownership, the Group has transferred control over the assets.

Financial assets and liabilities are offset and presented at net value when, and only when, the Group has the right to offset the recognised amounts and intends to settle on a net basis.

The Group classifies its financial assets in the following categories: financial assets at fair value through profit or loss, financial assets measured at amortised cost, financial assets at fair value through other comprehensive income. Their classification depends on the entity's business model for managing financial assets and the contractual characteristics in terms of the financial asset's cash flows.

Financial assets at fair value through profit or loss

This category includes derivative financial instruments and equity instruments that the Group has not classified as a financial asset through other comprehensive income at the time of initial recognition. This category also includes all financial instruments whose contractual cash flows are not exclusively principal and interest.

Financial assets at fair value through profit or loss are presented in the statement of financial position at fair value, with net changes recognised in the income statement. This category of assets includes derivative instruments and investments in listed companies for which the Company has not adopted the classification as financial assets at fair value through other comprehensive income. Dividends from investments in listed companies are recognised as income in the income statement when the respective right to receive them is formalised.

Gains and losses resulting from changes in the fair value of assets measured at fair value through profit or loss are recognised in the income statement for the year in which they occur under the respective heading of "Losses / (gains) on financial assets, net", which includes the amounts of interest and dividend income.

Financial assets at fair value through other comprehensive income

Financial assets measured at fair value through other comprehensive income are those that are part of a business model whose objective is achieved through the collection of contractual cash flows and the sale of financial assets, and these contractual cash flows are only repayments of principal and interest payments on the outstanding principal.

Financial assets measured at amortised cost

Financial assets measured at amortised cost are those that are part of a business model whose objective is to hold financial assets in order to receive contractual cash flows, these contractual cash flows being only repayments of principal and interest payments on the outstanding principal.

Financial assets measured at amortised cost are subsequently measured using the effective interest rate method and subject to impairment. Income and expenses are recognised in the income statement when the asset is derecognised, updated, or impaired. The Company's financial assets measured at amortised cost include accounts receivable and loans granted to related parties.

Cash and cash equivalents

The amounts included under "Cash and cash equivalents" correspond to cash, bank deposits, term deposits and other treasury applications with an initial maturity of up to three months from the date of acquisition and which can be mobilised immediately with an insignificant risk of change in value.

For the purposes of the cash flow statement, "Cash and cash equivalents" also includes bank overdrafts included in the statement of financial position under "Borrowings" (if applicable).

2.3.9. Financial liabilities and equity instruments

Financial liabilities and equity instruments are classified according to their contractual substance, regardless of their legal form. Financial liabilities are initially recognised at fair value. Equity instruments are contracts that show a residual interest in the Group's assets after deducting liabilities. Equity instruments issued by Group companies are recognised at the amount received, net of the costs incurred with their issue. Financial liabilities are derecognised only when extinguished, e.g. when the obligation is settled, cancelled or expired.

According to IFRS 9, financial liabilities are classified as subsequently measured at amortised cost, except for:

- financial liabilities at fair value through profit or loss. These liabilities, including derivatives that are liabilities, must subsequently be measured at fair value;
- financial liabilities that arise when a transfer of a financial asset does not fulfil the conditions for derecognition or when the continuing involvement approach is applied;
- financial guarantee contracts;
- commitments to grant a loan at a lower interest rate than the market rate;
- contingent consideration recognised by an acquirer in a business combination to which IFRS 3 applies. This contingent consideration must subsequently be measured at fair value, with changes recognised in profit or loss.

The Group's financial liabilities include borrowings, accounts payable and derivative financial instruments.

2.3.10. Impairment of financial assets

At each statement of financial position date, the Group analyses and recognises expected losses for its debt securities, loans, and receivables. Expected losses result from the difference between all the contractual cash flows that are due to an entity in accordance with the contract and all the cash flows that the entity expects to receive, discounted at the original effective interest rate.

The purpose of this impairment policy is to recognise expected credit losses over the respective duration of financial instruments that have been subject to significant increases in credit risk since initial recognition, assessed on an individual or collective basis, considering all reasonable and sustainable information, including forward-looking information. If, at the reporting date, the credit risk associated with a financial instrument has not increased significantly since initial recognition, the Group measures the provision for losses relating to that financial instrument at an amount equivalent to the credit losses expected within 12 months.

For receivables and assets resulting from contracts under IFRS 15, the Group adopts the simplified approach when calculating expected credit losses. As such, the Group does not monitor changes in credit risk, instead recognising impairment losses based on the expected credit loss at each reporting date. The Group has established a provisions matrix where it presents an impairment loss criterion that is based on the history of credit losses, adjusted for prospective factors specific to customers and the economic environment.

2.3.11. Derivative financial instruments

The Group applies the hedge accounting requirements of IFRS 9.

Initial and subsequent recognition

The Group uses derivative financial instruments, such as forward exchange rate contracts and interest rate swaps, to hedge its exchange rate and interest rate risks, respectively. These derivative financial instruments are initially recognised at fair value on the date the derivative is contracted and are subsequently measured at fair value. Derivatives are recognised as assets when their fair value is positive and as liabilities when their fair value is negative.

In terms of hedge accounting, hedges are classified as:

- fair value hedging when the purpose is to hedge exposure to changes in the fair value of a recognised asset or liability or an unrecognised Group commitment;
- cash flow hedges when the purpose is to hedge exposure to the variability of cash flows arising from a specific risk associated with all or a component of a recorded asset or liability or a forecast transaction that is highly probable to occur or the exchange risk associated with an unrecorded Group commitment;
- hedging a net investment in a foreign operating unit.

NOS Group uses derivative financial instruments to hedge fair value and cash flows.

At the beginning of the hedging relationship, the Group formally designates and documents the hedging relationship for which it intends to apply hedge accounting as well as the management purpose and strategy of that hedge.

The documentation includes the identification of the hedging instrument, the hedged item or transaction, the nature of the risk to be hedged and how the Group assesses whether the hedging relationship fulfils the hedge accounting requirements (including its analysis of the sources of hedge ineffectiveness and how it determines the hedge rate). A hedging relationship qualifies for hedge accounting if it fulfils all the following hedge effectiveness requirements:

- there is an economic relationship between the hedged item and the hedging instrument;
- the effect of credit risk does not dominate the changes in value that result from this economic relationship; and
- the hedge ratio of the hedging relationship is the same as that which results from the quantity of the hedged item that an entity effectively hedges and the quantity of the hedging instrument that the entity effectively uses to hedge that quantity of the hedged item.

Hedging relationships that fulfil the above eligibility criteria are accounted for as follows:

Fair value hedging

The change in the fair value of the hedging instrument is recognised in the income statement. The change in the fair value of the hedged item attributable to the hedged risk is recognised as part of the carrying amount of the hedged item and is also recognised in the income statement.

For fair value hedges of items measured at amortised cost, any adjustment to the carrying amount is amortised to the income statement over the remaining period of the hedge using the effective interest method. Amortisation using the effective interest method begins when the adjustment is made and no later than when the hedged item ceases to be adjusted for the changes in fair value attributable to the risk being hedged.

If the hedged item is derecognised, the unamortised fair value is recorded immediately in the income statement.

When an unrecorded commitment is designated as a hedged item, subsequent cumulative changes in the fair value of the Group's commitment attributable to the hedged risk are recognised as an asset or liability and the corresponding gain or loss recorded in the income statement.

Cash flow hedging

The effective portion of the gain or loss on the hedging instrument is recognised in Other comprehensive income in the cash flow hedge reserve, while the ineffective portion is recognised immediately in the income statement. The cash flow hedge reserve is adjusted to the lower of the cumulative gain or loss on the hedging instrument and the cumulative change in the fair value of the hedged item.

The Group uses forward contracts:

- Exchange rates to hedge exposure to exchange rate risk on expected transactions and commitments entered into; and
- Interest rates to cover the risk of interest rate fluctuations.

The ineffective portion related to exchange rate contracts is recognised as "Exchange rate losses/(gains), net", and the ineffective portion related to interest rate contracts is recognised as "Financing costs".

During the year ended 31 December 2024, the Group did not make any changes to the recognition method.

The amounts accumulated in Other Comprehensive Income are accounted for according to the nature of the respective hedging relationship. If the hedging relationship subsequently translates into the recording of a non-financial item, the accumulated amount is removed from the separate equity component and included in the initial cost or book value of the hedged asset or liability. This is not a reclassification adjustment and should not be recognised in Other comprehensive income for the period. This also applies when an expected hedged transaction of a non-financial asset or non-financial liability becomes a commitment of the Group subject to hedge accounting.

For any other cash flow hedges, the amount accumulated in Other comprehensive income is reclassified to the income statement as a reclassification adjustment in the same period or periods during which the hedged cash flows affect the income statement.

If cash flow hedge accounting is discontinued, the amount accumulated in Other comprehensive income must remain if the hedged future cash flows are still expected to occur. Otherwise, the accumulated amount is reclassified immediately to the income statement as a reclassification adjustment. After interruption, as soon as the hedged cash flows occur, any accumulated amount remaining in Other comprehensive income should be accounted for according to the nature of the underlying transaction as described above.

2.3.12. Inventories

Inventories, which essentially include mobile devices and their accessories for sale, equipment for installation in customers' homes, network and infrastructure equipment and products for sale in the cinema bar, are valued at the lower of their cost and net realisable value.

The acquisition cost includes the invoice price, transport, and insurance costs, using the "Weighted Average Cost" as the output costing method.

Inventories are adjusted for technological obsolescence, as well as for the difference between the acquisition cost and the realisable value, if this is lower, and this reduction is recognised directly in the income statement for the period.

The net realisable value corresponds to the normal selling price less the costs of completing production and marketing costs.

Differences between the cost and the respective net realisable value of inventories, if this is lower than the cost, are recorded as operating costs under "Cost of products sold".

Inventories in transit, since they are not available for consumption or sale, are segregated from other stocks and are valued at their specific acquisition cost.

The conclusion of contracts related to sports content gives rise to rights that are initially classified as contractual commitments.

Content broadcasting rights are recorded in the statement of financial position, as Inventories, in the event that there is no full right over the form of exploitation of the asset, at the respective cost value or net realisable value, whichever is lower, whenever the programme content has been received and is available for exhibition or use, in accordance with contractual conditions, without any production or alteration, it being understood for this purpose that the necessary conditions for the organisation of each sporting competition have been met, which occurs on the date of approval of the teams participating in the competition to be held in the sporting season to be started, by the organising entity. These rights are recognised in the income statement under "Direct costs: Content costs", on a systematic basis considering the pattern of economic benefits obtained through their commercial exploitation. No balances of content exploitation rights are recognised under Inventories.

As a result of the agreement reached with the national operators on the reciprocal provision, for several sports seasons (collaborative arrangement), of the sports content (national and international) held by them (Note 44.2), NOS considered recognising the costs and revenues net of the amounts shared by the other operators, on a systematic basis, taking into account the pattern of economic benefits obtained through their commercial exploitation.

2.3.13. Grants

Grants are recognised at fair value when there is reasonable assurance that they will be received and that the Group companies will comply with the conditions required for granting them.

Operating grants, namely for employee training, are recognised in the profit and loss account against the corresponding costs incurred.

Investment grants are deducted from tangible and intangible assets to the extent of the associated expenses, and are recognised in the income statement (depreciation, amortisation and impairment losses) on a systematic and rational basis over the useful life of the asset.

2.3.14. Provisions and contingent liabilities

Provisions are recognised when:

- there is a present obligation as a result of past events, and it is probable that an outflow of internal resources will be required to settle the obligation; and
- the amount or value of said obligation is reasonably estimable.

When one of the conditions described above is not met, the Group discloses the events as contingent liabilities, unless the possibility of an outflow of funds arising from the contingency is remote, in which case they are not disclosed.

Provisions for ongoing legal proceedings brought against the Group are recognised in accordance with risk assessments made by the Group and its legal advisors, based on success rates.

Provisions for restructuring are only recognised when the Group has a detailed and formalised plan identifying the main features of the programme and after these facts have been communicated to the entities involved.

Provisions for the costs of dismantling, removing assets and restoring the site are recognised when the assets are installed (against Tangible fixed assets) whenever there is a legal or constructive obligation to dismantle an asset, restore the site on which it is located and when a reasonable estimate can be made. The present value is calculated based on discounted values and considering the economic useful life of the assets. The amount of the liability reflects the effects of the passage of time, and the corresponding financial update is recognised in the income statement as a financial cost. The effects of changes resulting from revisions to the term or value of the original estimate of the provision are reflected prospectively, adjusting the book value of the tangible fixed asset. However, when there is no asset, or the change implies a nil book value, the effect, or the excess value of the asset reduction, is recognised in the income statement. The discount rate applied on 31 December 2024 was 3.4%. The discount rate is reviewed periodically/annually.

Present obligations arising from onerous contracts are recognised and measured as provisions. An onerous contract exists when the Company is an integral part of a contract, the fulfilment of which has costs directly associated with the contract (both incremental costs and an allocation of costs directly related to the contract) that exceed the future economic benefits.

No provisions are recognised for future operating losses.

Contingent liabilities are not recognised in the financial statements, except as provided for in IFRS 3 in the context of business combinations and are disclosed whenever the possibility of an outflow of resources involving economic benefits is not remote. Contingent assets are not recognised in the financial statements but are disclosed when it is probable that there will be a future economic inflow of resources.

Provisions are reviewed and updated on the statement of financial position date to reflect the best estimate at that time of the obligation in question.

2.3.15. Rights of use and leases

A lease is defined as a contract, or part of a contract, that transfers the right to use an asset (the underlying asset), for a period, in exchange for value.

At the beginning of each contract, it is assessed and identified whether it is or contains a lease. This assessment involves an exercise of judgement as to whether each contract depends on a specific asset, whether the NOS obtains substantially all the economic benefits from the use of that asset and whether the NOS has the right to control the use of the asset.

All contracts that constitute a lease are accounted for based on a single on-balance model.

On the lease commencement date, NOS recognises the liability related to the lease payments (e.g. the lease liability) and the asset representing the right to use the underlying asset during the lease period (e.g. the right-of-use or ROU).

The interest cost on the lease liability and the depreciation of the ROU are recognised separately.

The lease liability is remeasured when certain events occur (such as a change in the lease period, a change in future payments resulting from a change in the reference index or the rate used to determine those payments). This remeasurement of the lease liability is recognised as an adjustment to the ROU.

The estimated costs of dismantling, removing assets and restoring the site in connection with leases are recognised in tangible fixed assets together with the works performed (Note 2.3.3).

2.3.15.1. Rights to use assets

The Group recognises the right to use the assets on the lease commencement date (e.g. the date on which the underlying asset is available for use).

The right to use the assets is recognised at acquisition cost, less accumulated depreciation and impairment losses and adjusted for any new measurements of the lease liability. The cost of the right to use the assets includes the recognised value of the lease liability, any direct costs initially incurred, and payments already made before the initial lease date, less any incentives received.

Unless it is reasonably certain that the Group will obtain ownership of the leased asset at the end of the lease term, the right to use the assets recognised is depreciated using the straight-line method over the shorter of its estimated useful life and the lease term.

Rights of use are subject to impairment.

Rights to use assets depreciate on a straight-line basis over the shorter of the contractual term and the asset's expected useful life.

If the lease asset is transferred to the Company at the end of the contract, or the cost reflects the possibility of exercising the purchase option, depreciation is calculated according to the asset's estimated useful life.

2.3.15.2. Lease liabilities

On the lease commencement date, the Group recognises liabilities measured at the present value of future payments to be made until the end of the lease.

Lease payments include fixed payments (including fixed payments in substance), less any incentives receivable, variable payments, dependent on an index or a rate, and amounts expected to be paid under residual value guarantees. Lease payments also include the exercise price of a purchase option, if it is reasonably certain that the Group will exercise the option, and

penalty payments for the termination of the contract, if it is reasonably certain that the Group will terminate the contract.

Variable payments that do not depend on an index or rate are recognised as an expense in the period in which the event giving rise to them occurs.

When calculating the present value of lease payments, the Group uses the incremental borrowing rate on the lease start date, if the implicit interest rate is not easily determinable.

The Group does not apply the practical expedient provided for leases of less than one year.

After the start date of the lease, the value of the lease liability increases to reflect the increase in interest and decreases due to the payments made. In addition, the carrying amount of the lease liability is remeasured if there is a change, such as a change in the lease term, in the fixed payments or in the decision to purchase the underlying asset.

2.3.16. Income tax

NOS is covered by the special taxation regime for groups of companies, which covers all companies in which it holds, directly or indirectly, at least 75% of the share capital and which are simultaneously resident in Portugal and subject to Corporate Income Tax (IRC).

The remaining subsidiaries, which are not covered by the special taxation regime for groups of companies, are taxed individually, based on their respective tax bases and the applicable tax rates.

Income tax is recognised in accordance with IAS 12. When measuring the cost of income tax for the year, in addition to current tax, the effect of deferred tax is also taken into account, calculated using the liability method, taking into account temporary differences resulting from the difference between the tax base of assets and liabilities and their values in the consolidated financial statements, as well as tax losses carried forward existing at the date of the statement of position financial. Deferred tax assets and liabilities were calculated based on tax legislation currently in force and legislation already published for future application.

Deferred tax assets are recognised for all deductible temporary differences to the extent that it is probable that taxable profit will be available against which the deductible temporary difference can be used, unless the deferred tax asset results from the initial recognition of an asset or liability in a transaction that:

- is not a concentration of business activities;
- at the time of the transaction, does not affect accounting profit or taxable profit (tax loss);
- with regard to deductible temporary differences arising from investments in subsidiaries, branches and associates and interests in joint arrangements, deferred tax assets are recognised only to the extent that the temporary difference will reverse in the foreseeable future and taxable profit will be available against which the temporary difference can be utilised.

As established in this standard, deferred tax assets are recognised only when there is reasonable certainty that they will be used to reduce future taxable income, or when there are deferred tax liabilities whose reversal is expected in the same period in which the deferred tax assets are reversed. These deferred tax assets are valued at the end of each period and adjusted according to their expected future use.

The amount of tax to be included in either current or deferred tax, which results from transactions or events recognised under equity headings, is recorded directly under these same headings, and does not affect the result for the year.

In a business combination, the deferred tax benefits acquired are recognised as follows:

- acquired deferred tax benefits that are recognised in the measurement period (one year after the date of the combination) and that result from new information about facts and circumstances that existed at the acquisition date are applied to reduce the carrying amount of any goodwill related to that acquisition. If the carrying amount of that goodwill is zero, any remaining deferred tax benefits are recognised in the income statement.

- all other deferred tax benefits acquired that are realised are recognised in the income statement (or, if applicable, directly in equity).

Estimates to deal with uncertainties regarding the acceptance of a given tax treatment by the tax authorities are recognised as deferred tax liabilities.

Pillar II

Portugal transposed Directive (EU) 2022/2523, of 15 December 2022, into national law by means of Law 41/2024, of 8 November ("the Law"), which introduced a worldwide minimum level of taxation for multinational company groups and large national groups into the Portuguese legal system, commonly known as "Pillar II".

Considering the rules approved in the Law and the best information available now, NOS has performed an assessment of the possible impacts of Pillar II for the NOS Group, estimating that the group will benefit from the supplementary tax exclusion in the initial phase of international activity, provided for in article 44 of the Law, under the transitional regime, applicable for a period of 5 years (2024-2028).

2.3.17. Share-based payment

Benefits granted to employees under share incentive plans or share options are recognised in accordance with the provisions of IFRS 2 - Share-based payments.

In accordance with IFRS 2, since it is not possible to reliably estimate the fair value of services received from employees, their value is measured by reference to the fair value of equity instruments (treasury shares), according to their price on the date of attribution.

This cost is recognised on a straight-line basis over the period in which the service is provided by the employees, under Wages and salaries in the income statement, together with the corresponding increase in Other reserves in equity.

The accumulated cost recognised on the date of each financial statement until vesting reflects the Group's best estimate of the number of own shares that will be vested, weighted by the proportional time elapsed between the award and vesting. The impact on the income statement for each financial year represents the change in the accumulated cost between the beginning and the end of the period.

In turn, benefits granted based on shares but settled in cash lead to the recognition of a liability valued at fair value on the statement of financial position date.

2.3.18. Capital

Share premiums

Share premiums correspond to premiums obtained from the issue or capital increases. In accordance with Portuguese commercial legislation, the amounts included under this heading follow the regime established for the "Legal Reserve", e.g. the amounts are not distributable, except in the event of liquidation, but can be used to absorb losses, after all other reserves have been exhausted, and for incorporation into capital.

Own shares

Own shares are recognised at their acquisition value as a deduction from equity. Gains or losses inherent in the sale of own shares are recorded under "Other reserves".

Legal reserve

Portuguese commercial legislation establishes that at least 5% of the annual net profit must be set aside to reinforce the legal reserve, until it represents at least 20% of the share capital. This reserve is not distributable, except in the event of liquidation, but it can be used to absorb losses, after all other reserves have been exhausted, and for incorporation into the capital.

Other reserves and retained earnings

Reserves for medium-term incentive plans

In accordance with IFRS 2 - "Share-based payments", the liability for medium-term incentive plans settled through the delivery of own shares is recognised as a credit under the heading "Reserves for medium-term incentive plans", and this reserve cannot be distributed or used to absorb losses.

Hedging reserves

Hedging reserves reflect changes in the fair value of cash-flow hedging derivative financial instruments that are considered to be effective and cannot be distributed or used to absorb losses.

Reserves for own shares

Reserves for own shares" reflect the value of own shares acquired and follow a legal regime equivalent to that of the legal reserve.

Other reserves and retained earnings

This item includes realised profits available for distribution to shareholders and gains from increases in the fair value of financial instruments, financial investments and investment properties, which, in accordance with Article 32, number 2, of the CSC, will only be available for distribution when the items or rights that gave rise to them are sold, exercised, extinguished or liquidated.

Under Portuguese law, the amount of distributable reserves is determined in accordance with the company's individual financial statements, presented in accordance with IFRS. In addition, increases resulting from the application of fair value through equity components, including those from their application through net income for the period, can only be distributed when the elements that gave rise to them are sold, exercised, liquidated or when their use ends, in the case of tangible or intangible assets.

Dividends

The company recognises the liability, and the respective impact on equity, associated with the responsibility to distribute dividends when it is approved by the shareholders.

2.3.19. Revenue

The main types of operating revenue of NOS subsidiaries are as follows:

- Revenues from Communications Services:
- Cable/satellite television, fixed broadband and fixed voice: Revenues from services provided over the fibre and cable network result from:
  - subscription to basic channel packages that can be commercialised as a bundle with fixed broadband and/or fixed voice services;
  - subscription to premium channel packages and S-VOD;
  - terminal equipment hire;
  - content consumption (VOD);
  - traffic and voice termination;
  - service activation;
  - sale of equipment, licences and others; and
  - other additional services (e.g. *firewall* and antivirus).
- Mobile broadband and voice: Revenues from mobile broadband Internet access services and mobile voice services are mainly derived from the monthly subscription and/or use of the Internet and voice service, in addition to the traffic associated with the mode chosen by the customer.
- Advertising revenue: Advertising revenue essentially includes advertising for pay-TV channels for which the Group holds the operating rights and cinemas. These revenues are recognised in the period of their insertion, less any discounts granted.
- Distribution and Cinema Exhibition: Distribution revenues refer to the distribution of films to cinematographic exhibitors not owned by the Group, which are recognised in the period in which the films are shown, while cinema exhibition revenues derive mainly from the sale of cinema tickets and the sale of products in bars, which are recognised as revenue in the period in which the films are shown from the tickets sold and the sale of products in bars, respectively.
- Content and Channel Distribution Revenues: distribution revenues basically include the sale of DVDs and content and the distribution of subscription television channels to third parties, and are recognised in the period in which they are sold, exhibited and made available for distribution to telecommunications operators, respectively. The activity of distributing pay-TV channels to third parties consists of the transmission and retransmission of information, including the distribution of own and third-party television and radio broadcasting programmes, whether encoded or not, as well as the provision of direct mail and data transmission services. NOS is a principal in this activity

to the extent that: it controls the exhibition of channels in its product package, it has the power to set prices, the remuneration corresponds to the price of the service and not a mere commission and it is exposed to the credit risk of its customers.

- Consultancy and Datacentre Management: consultancy revenues in the area of information systems and datacentre management correspond predominantly to the provision of services by NOS Sistemas.
- Commissions from insurance mediation: commission income from insurance sales mediation is earned by NOS Mediação de Seguros.
- Alarme Inteligente: the revenues obtained from NOS | Securitas Alarme Inteligente include security solutions for people and property, which combine the professional monitoring of the Securitas Alarm Centre with NOS's state-of-the-art technology.

The Group's revenue is based on the five-step model established by IFRS 15:

- identification of the contract with the client;
- identification of performance obligations;
- determining the transaction price;
- allocation of the transaction price to performance obligations; and
- revenue recognition.

Therefore, at the beginning of each contract, the NOS Group evaluates the promised goods or services and identifies, as a performance obligation, each promise to transfer to the customer any distinct good or service (or a package of goods or services). These promises in contracts with customers may be explicit or implicit, provided that such promises create a valid expectation in the customer that the entity will transfer a good or service to the customer, based on published policies, specific statements, or customary business practices of the entity.

NOS Group has defined internally that a performance obligation corresponds to the promise to deliver a good or service that can be used in isolation/separately by the customer and for which there is a clear perception by the customer of this good or service among the others available in each contract.

The main performance obligations are sales of mobile phones, telephones, hotspots, DVDs, cinema tickets, licences and other equipment and the provision of mobile Internet, fixed Internet, mobile telephone, fixed telephone, television, consultancy, cloud/IT services and distribution of audiovisual rights, among others.

The provision of *set-top-boxes*, routers, modems and other terminal equipment at customers' homes and the respective installation and activation services were considered by the group not to correspond to a performance obligation, as they are necessary actions for the fulfilment of the promised performance obligations.

In determining and allocating the transaction price of each performance obligation, NOS used the *stand-alone* prices of the promised products and services at the time the contract was entered into with the client to apportion the amount expected to be received on fulfilment of the contract.

Revenue is recognised when each performance obligation is fulfilled.

Revenue from the sale of equipment is recognised when the risks and rewards of ownership are transferred to the buyer and the value of the benefits can be reasonably quantified.

Revenue from subscriptions to telecommunications services (subscription to television, internet, mobile and fixed voice packages, alone or together) is recognised on a straight-line basis over the period of the subscription.

Revenue from equipment rental is recognised on a straight-line basis over the term of the rental agreement, except in the case of instalment sales which are accounted for as credit sales.

The Group awards its customers loyalty points for each call or top-up made, which can be exchanged for a limited period of time for discounts on the purchase of equipment.

In each reporting period, NOS recognises the current liability with the discounts to be attributed in the future. This liability is calculated based on the amount of points awarded and not yet used, deducted from the estimate of points that will not be used (based on historical usage) and valued on the basis of the offer available at any given time for the use of points (specific catalogue).

The recognition of the liability constitutes a deferral of revenue (until the date on which the points are definitively converted into benefits), which is recognised when the discount is used, as an increase in revenue.

Revenue from traffic, roaming, data consumption, audiovisual content and others is recognised in the period in which the service is provided. The Group also offers several customised solutions, particularly to its corporate clients in the management of the telecommunications network, access, voice and data transmission, which are also recognised when the service is provided.

Income and expenses are not offset unless this is required or permitted by the IFRS, namely when it reflects the substance of the transaction or other event.

Income and expenses are offset in the following situations:

- when the gross inflows of economic benefits do not result in an increase in equity for the entity, e.g. the amount charged to the customer is equal to the amount delivered to the partner, a situation applicable to the revenue obtained from invoicing special service operators, the amounts charged on account of capital are not revenue; e,

- when the counterparty is not a "customer", but rather a partner who shares the risks and benefits of developing a product or services so that it can be commercialised. In other words, a counterparty to the contract will not be a client if, for example, the counterparty has contracted NOS to participate in an activity or process in which the parties to the contract share the risks and benefits rather than obtaining the result of the entity's ordinary activities. In these cases, we are dealing with collaborative arrangements. This situation applies to the revenues obtained from the operators covered by the agreement for the reciprocal provision of television broadcasting rights for sports content.

Discounts granted to customers under loyalty programmes are allocated to the entire contract to which the customer is loyal and are recognised as the goods and services are made available to the customer.

Unbilled amounts are recorded on the basis of estimates. Differences between estimated and actual amounts, which are usually not significant, are recognised in the subsequent period.

Penalty income is recognised under "Other income" as it is received.

Interest revenue is recognised using the effective interest method, provided that economic benefits are probable.

2.3.20. Accruals

The income and expenses of the various Group companies are recognised on an accruals basis, whereby they are recognised as they are generated or incurred, regardless of when they are received or paid.

The headings "Accounts receivable - customers", "Accounts receivable - other", "Deferred costs", "Accrued costs" and "Deferred income" include costs and income attributable to the current financial year and whose expenses and income will only occur in future financial years, as well as expenses and income that have already occurred but relate to future financial years and which will be charged to the results of each of those financial years, for the amount corresponding to them.

Costs attributable to the current financial year and whose expenditure will only be incurred in future financial years are estimated and recorded under "Accrued costs", whenever it is possible to estimate the amount with great reliability, as well as when the expense will be incurred. If there is uncertainty regarding either the date of the outflow of resources or the amount of the obligation, the value is classified as Provisions (Note 2.3.14)

2.3.21. Assets, liabilities and transactions in foreign currency

Transactions in foreign currency are converted into the functional currency at the exchange rate on the date of the transaction. On each closing date, open balances (monetary items) are restated using the exchange rate in force on that date. Exchange rate differences resulting from this update are recognised in the income statement for the year in which they were determined, under the heading "Losses/(gains) on exchange rate variations". Exchange rate variations generated on monetary items that constitute an extension of the investment denominated in the functional currency of the Group or the subsidiary in question are recognised in equity. Exchange differences on non-monetary items are recognised under "Other reserves" in equity.

The financial statements of subsidiaries denominated in foreign currency are translated using the following exchange rates:

- exchange rate in force on the date of the statement of financial position for the conversion of assets and liabilities;
- average exchange rate for the period for converting income statement items, except in the case of subsidiaries in a hyperinflationary economy;
- average exchange rate for the period for the conversion of cash flows (in cases where this exchange rate is close to the real rate, and for the remaining cash flows the exchange rate on the date of the transactions is used), with the exception of subsidiaries in a hyperinflationary economy;
- historical exchange rate for the conversion of equity items.

Exchange differences arising from the conversion to euros of the financial statements of subsidiaries denominated in foreign currency are included in equity under "Other reserves".

In the last quarter of 2017, the Angolan economy was considered a hyperinflationary economy in accordance with IAS 29 - Financial Reporting in Hyperinflationary Economies.

This standard requires financial statements prepared in the currency of a hyperinflationary economy to be expressed in terms of the measurement unit current at the date of preparation of the financial statements.

To summarise, the general aspects to be considered when restating the individual financial statements are as follows:

- monetary assets and liabilities are unchanged as they are already updated to the current unit on the date of the financial statements;
- non-monetary assets and liabilities (which are not already expressed at the current unit on the date of the financial statements) are restated by applying an index;
- the effect of inflation on the net monetary position of subsidiaries is reflected in the income statement as a loss on net monetary position.

In addition, according to IAS 21, the restatement of consolidated financial statements is prohibited when the parent company does not operate in a hyperinflationary economy.

The conversion coefficient used in the restatement of the individual financial statements of subsidiaries in Angola was the consumer price index (CPI) published by the Banco Nacional de Angola.

In the last quarter of 2019, the Angolan economy ceased to be considered a hyperinflationary economy.

IAS 29 - Financial Reporting in Hyperinflationary Economies states that "when an economy ceases to be hyperinflationary, the company should treat the amounts expressed in the unit of measurement current at the end of the previous reporting period as the basis for the amounts carried in its subsequent financial statements". In this way, the adjustments/revaluations made until the end of the classification as a hyperinflationary economy are treated as a deemed cost and recognised in the same proportion as the assets that gave rise to them.

As at 31 December 2023 and 2024, assets and liabilities expressed in foreign currencies were converted into euros based on the following exchange rates for these currencies against the Euro, published by the Banco de Portugal.

	31-12-2023	31-12-2024
US Dollar	1.1050	1.0389
Angolan Kwanza	930.9625	947.4768
Sterling Pound	0.8691	0.8292
Mozambican Metical	69.8700	65.7300
Canadian Dollar	1.4642	1.4948
Swiss franc	0.9260	0.9412
Real	5.3618	6.4253

For the years ended 31 December 2023 and 2024, the income statements of subsidiaries expressed in foreign currency were converted into Euro based on the average exchange rates of the currencies of the respective countries of origin in relation to the Euro. The average exchange rates used are as follows:

	12M 23	12M 24
Angolan Kwanza	759.5493	948.5327
Mozambican Metical	68.4942	68.3725

2.3.22. Financial charges on loans

Borrowing costs are recognised as an expense on an accrual's basis, except in the case of loans incurred in the acquisition, construction or production of an asset that will take a substantial period of time (more than one year) to be in the desired condition, which are capitalised in the acquisition cost of the asset. Capitalised borrowing costs are determined considering the amount of borrowing costs eligible for capitalisation, by applying a capitalisation rate to the expenditure relating to that asset. The capitalisation rate (in line with NOS' average financing rate) as well as the costs to be capitalised are calculated monthly, considering the monthly balance of eligible loans and the monthly amount of the qualifying asset in progress.

2.3.23. Investment property

Investment properties essentially comprise buildings held for rental purposes and not for use in the production or supply of goods or services, for administrative purposes or for sale in the ordinary course of business. These are initially measured at cost.

Subsequently, the Group used the cost method to measure investment properties, considering that the adoption of the fair value model would not result in significant differences.

An investment property should be eliminated from the statement of financial position on disposal, or when the investment property is permanently withdrawn from use and no economic benefits are expected from its disposal.

2.3.24. Measurement at fair value

The Group measures part of its financial assets, such as available-for-sale and trading financial assets, and part of its non-financial assets, at fair value on the reference date of the financial statements.

Fair value measurement assumes that the asset or liability is exchanged in an orderly transaction between market participants to sell the asset or transfer the liability, on the measurement date, under current market conditions. Fair value measurement is based on the assumption that the transaction to sell the asset or transfer the liability can occur:

- on the main market for assets and liabilities, or
- in the absence of a main market, the transaction is assumed to take place in the most advantageous market. This is the one that maximises the amount that would be received on the sale of the asset or minimises the amount that would be paid to transfer the liability, after considering transaction costs and transport costs.

Because the different entities and the different businesses within a single entity may have access to different markets, the main or most advantageous market for the same asset or

liability may vary from one entity to another, or even between businesses within the same entity, but it is assumed that they are accessible to the Group.

The measurement of fair value uses assumptions that market participants would use in setting the price of the asset or liability, assuming that market participants would use the asset in such a way as to maximise its value and use.

The Group uses valuation techniques that are appropriate to the circumstances and for which there is sufficient data to measure fair value, maximising the use of relevant observable data and minimising the use of unobservable data.

All assets and liabilities measured at fair value or for which disclosure is mandatory are classified according to a fair value hierarchy, which categorises the data to be used in fair value measurement into three levels, detailed below:

- Level 1 - Unadjusted quoted market prices in active markets for identical assets or liabilities that the entity can access at the measurement date;
- Level 2 - Valuation techniques that use inputs that are not quoted but are directly or indirectly observable;
- Level 3 - Valuation techniques that use inputs not based on observable market data, e.g. based on unobservable data.

Fair value measurement is classified entirely at the lowest level of input that is significant to the measurement as a whole.

2.3.25. Offsetting assets and liabilities

Assets and liabilities are offset and presented at net value when, and only when, the Group has the right to offset the recognised amounts and intends to settle on a net basis.

2.3.26. Employee benefits

Personnel costs are recognised when the service is provided by employees, regardless of when they are paid. Here are some specifics regarding each of the benefits:

- Termination of employment: Termination benefits are due for payment when employment is terminated before the normal retirement date, when an employee voluntarily agrees to leave in exchange for these benefits and when restructuring costs are recognised. If there is an expectation that the benefits will not be settled in full within 12 months of the reporting date, they are discounted. Restructuring costs are recognised separately in the income statement.

  The Group recognises these benefits when it can be demonstrated that it is committed to terminating the employment of current employees in accordance with a detailed formal plan for termination and there is no realistic possibility of withdrawal, or these benefits are granted to encourage voluntary departure. Whenever termination benefits fall due more than 12 months after the balance sheet date, they are discounted to their present value.

- Holidays, holiday pay and bonuses. In accordance with labour law, employees are entitled to 22 working days of annual leave, as well as one month's holiday pay, rights acquired in the year prior to their payment. These Group liabilities are recognised when

incurred, regardless of when they are paid, and are reflected under "Accounts payable and other".

- Labour Compensation Fund (FCT) and the Labour Compensation Guarantee Fund (FGCT). With the publication of Law no. 70/2013 and subsequent regulation by Ministerial Order 294-A/2013, the Labour Compensation Fund (FCT) and the Labour Compensation Guarantee Fund (FGCT) came into force on 1 October 2013. In this context, companies that hire a new employee are obliged to deduct a percentage of their salary from these two new funds (0.925% for the FCT and 0.075% for the FGCT), with the aim of ensuring partial payment of compensation in the event of redundancy in the future. Considering the characteristics of each Fund, the following was considered:

    - monthly contributions to the FGCT made by the employer are recognised as an expense in the period to which they relate;

    - the monthly payments made by the employer to the FCT are recognised as a financial asset under the heading "Other non-current financial assets" of that entity, measured at fair value, with the respective changes recognised in the income statement.

With the publication of Law 13/2023, as of 1 May 2023, it is no longer compulsory to make payments corresponding to 0.925% of each worker's basic salary and seniority to the FCT, which has been converted into a closed accounting fund.

According to the same law, the obligations relating to the FGCT corresponding to 0.075% are suspended for the duration of the Medium-Term Agreement for improving incomes, wages and competitiveness, which is expected to run until 2026.

2.3.27. Cash flow statement

The cash flow statement is prepared in accordance with the direct method. The Group classifies assets with a maturity of less than three months and for which the risk of a change in value is insignificant under cash and cash equivalents. For the purposes of the cash flow statement, cash and cash equivalents also include bank overdrafts, which are included in the statement of financial position under "Borrowings".

The cash flow statement is categorised into operating, investing, and financing activities.

Operating activities include receipts from customers and payments to suppliers, staff and others related to operating activities. The item "other receipts / (payments) relating to operating activity" includes the amounts received and subsequent payments relating to the non-recourse credit transfers coordinated by Banco Comercial Português and Caixa Geral de Depósitos, and these operations did not imply any change in the accounting treatment of the underlying credits or in the relationship with the respective customers.

The cash flows covered by investing activities include, in particular, acquisitions and disposals of investments in subsidiaries and receipts and payments arising from the purchase and sale of tangible fixed assets and intangible assets, among others.

Financing activities include payments and receipts relating to borrowings, interest payments and similar costs, leasing contracts, the purchase and sale of own shares and the payment of dividends.

2.3.28. Subsequent events

Events occurring after the date of the statement of financial position that provide additional information on conditions that existed at that date are considered in the preparation of the financial statements for the period.

Events occurring after the date of the statement of financial position that provide information on conditions occurring after that date are disclosed in the notes to the financial statements if they are materially relevant.

3. Judgements and Estimates

3.1. Relevant accounting estimates

The preparation of consolidated financial statements requires the Group's management to make judgements and estimates that affect the statement of financial position and reported results. These estimates are based on the best information and knowledge of past and/or present events and the actions that the company believes it may take in the future. However, on the date operations are realised, their results may differ from these estimates.

Changes to these estimates that occur after the date of approval of the consolidated financial statements will be corrected prospectively in the results, in accordance with IAS 8 - "Accounting policies, changes in accounting estimates and errors".

The estimates and assumptions that present the greatest risk of giving rise to a material adjustment in assets and liabilities are presented below:

Entities included in the consolidation perimeter

In determining which entities to include in the consolidation perimeter, the Group assesses the extent to which it is exposed, or has rights, to the variability in returns arising from its involvement with that entity and can seize them through the power it holds over that entity (de facto control).

The decision that an entity must be consolidated by the Group requires the use of judgement, assumptions and estimates to determine the extent to which the Group is exposed to the variability of returns and the ability to seize them through its power.

Other assumptions and estimates could lead to the Group's consolidation perimeter being different, with a direct impact on the consolidated financial statements.

Impairment of non-current assets, excluding goodwill

The determination of a possible impairment loss may be triggered by the occurrence of several events, such as the future availability of financing, the cost of capital or any other adverse changes in the technological, market, economic and legal environment, many of which are outside the Group's sphere of influence.

The identification and assessment of impairment indicators, the estimation of future cash flows and the determination of the recoverable value of assets involve a high degree of judgement on the part of management.

Impairment of goodwill

Goodwill is subject to annual impairment tests or whenever there are indications of a possible loss in value, in accordance with the criteria indicated in Note 9. The recoverable amounts of the cash-generating units to which goodwill is attributed are determined since value-in-use calculations. These calculations require the use of estimates by management.

Tangible fixed assets and intangible assets

The useful life of an asset is the period during which the Group expects an asset to be available for use and this must be reviewed at least at the end of each financial year.

Determining the useful lives of assets, the amortisation/depreciation method to be applied and the estimated losses arising from replacing them before the end of their useful lives, for reasons of technological and/or other obsolescence, is essential for determining the amount of amortisation/depreciation to be recognised in the income statement for each period.

These three parameters are defined according to management's best estimate for the assets and businesses in question, also considering the practices adopted by companies in the sectors in which the Group operates.

The capitalised costs associated with distribution rights for audiovisual content acquired for sale in the various exhibition windows are amortised over the maximum operating period set out in the respective contracts. In addition, these assets are subject to impairment tests whenever there are indications of changes in the pattern of future revenue generation underlying each contract.

Residual values, useful lives and depreciation methods are reviewed periodically by the various Group companies and adjusted prospectively, if appropriate.

Rights of use

The Group determines the end of the lease as the non-cancellable part of the lease term, together with any periods covered by an option to extend the lease if it is reasonably certain that this will be exercised, or any periods covered by an option to terminate the lease if it is reasonably certain that this will not be exercised.

The Group has the option, under some of its lease contracts, to rent out its assets for additional periods. NOS assesses the reasonableness of exercising the option to renew the contract. That is, it considers all the relevant factors that create an economic incentive to exercise the renewal. After the start date, the Group reassesses the end of the contract if there is a significant event or changes in circumstances that are within its control and affect its ability to exercise (or not exercise) the renewal option (for example, a change in business strategy).

Provisions

The Group periodically analyses any obligations resulting from past events that should be recognised or disclosed. The subjectivity inherent in determining the probability and amount of internal resources needed to pay the obligations could lead to significant adjustments, either due to changes in the assumptions used or the future recognition of provisions previously disclosed as contingent liabilities.

Deferred tax assets

Deferred tax assets are only recognised when there is strong certainty that future taxable profits will be available to use the temporary differences or when there are deferred tax liabilities whose

reversal is expected in the same period in which the deferred tax assets are reversed. Deferred tax assets are valued by management at the end of each period, considering the Group's expected future performance.

Expected credit losses

The credit risk of the accounts receivable balances is assessed at each reporting date using a collection matrix, which is based on the history of past collections adjusted for the expected future evolution of collections, in order to calculate the uncollectibility rate. The expected credit losses on accounts receivable are thus adjusted by the assessment made, which may differ from the actual risk that will be incurred in the future.

Fair value of financial assets and liabilities

When determining the fair value of a financial asset or liability with an active market, the respective market price is applied. If there is no active market, which is the case for some of the Group's financial assets and liabilities, valuation techniques generally accepted in the market are used, based on market assumptions.

The Group applies valuation techniques for unlisted financial instruments, such as derivatives, financial instruments at fair value and instruments measured at amortised cost. The most frequently used valuation models are discounted cash flow models and option models, which incorporate, for example, interest rate curves and market volatility.

For some types of more complex derivatives, more advanced valuation models are used, containing assumptions and data that are not directly observable in the market, for which the Group uses internal estimates and assumptions.

3.2. Errors, estimates and changes in accounting policies

During the years ended 31 December 2023 and 2024, no material errors, estimates or changes in accounting policies relating to previous years were recognised. As at 31 December 2024, estimates were reclassified to deal with uncertainties regarding the acceptance of a certain tax treatment by the Tax Authorities, from deferred tax liabilities to non-current taxes payable, in the amount of approximately Euro 41.3 million (31 December 2023: Euro 44.0 million), with restatement of the period ended 31 December 2023, for comparability purposes (Note 14). Also as at 31 December 2023, estimates of the amounts receivable as a result of favourable decisions in the Constitutional Court in proceedings brought by the company relating to the settlement of the Activity Tax were reclassified from accounts receivable - customers to accounts receivable - other, in the amount of approximately Euro 22.9 million, which were fully received on that date (Notes 13 and 19).

4. Policies and Risk Management

4.1. Financial Risk Management

The Group's activities are exposed to a variety of financial risk factors: credit risk, liquidity risk and market risk.

The Group's Board of Directors is responsible for defining the principles for risk management and the policies covering specific areas such as: exchange rate risk, interest rate risk, credit risk, the use of derivatives and other non-derivative financial instruments, as well as the investment of excess liquidity.

A) Credit risk

Credit risk is essentially related to the risk of a counterparty failing in its contractual obligations, resulting in a financial loss for the Group. The Group is subject to credit risk in its operating and treasury activities.

Credit risk related to operations is essentially related to loans for services rendered to customers (Notes 13 and 19). This risk is monitored on a regular business basis, and management's objective is to: i) limit the credit granted to customers, considering the average term of receivables from each customer; ii) monitor the evolution of the level of credit granted; and iii) carry out impairment analyses of receivables on a regular basis.

The classification of a client as being in default considers the particularities of each client, business/segment and the amounts involved.

In most segments, a customer whose debt is more than 180 days overdue is considered to be in default. In the residential segment, which is the main segment, NOS has a measure to restrict non-compliance, blocking the services provided after 50 days from the due date without receipt.

The Group does not present any significant credit risk with any particular client, as the accounts receivable derive from a large number of clients relating to various businesses.

Expected credit loss adjustments for accounts receivable are calculated considering: i) the customer's risk profile, depending on whether they are a residential or business customer; ii) the average collection period, which differs from business to business; iii) the customer's financial condition; and iv) the future outlook for collection. Given the dispersion of customers, it is not necessary to consider an additional credit risk adjustment, beyond the expected credit losses already recorded in accounts receivable - customers and accounts receivable - other.

Doubtful loans, which have been in arrears for more than 24 months and have a recorded total impairment loss, are derecognised on a regular basis after all collection efforts deemed appropriate to recover the loan have been exhausted or frustrated.

The following table represents the Group's maximum exposure to credit risk as at 31 December 2023 and 2024, without taking into account any collateral held or other credit enhancements.

	31-12-2023	31-12-2024
Accounts receivable - Trade receivables (Note 19)	272,749	256,809
Other receivables - other non-current (Note 13)	4,364	3,911
Accounts receivable other - current (Note 13)	26,997	50,076
Cash and cash equivalents (Note 22)	17,271	8,522
Total financial assets	**321,381**	**319,318**

Accounts receivable – Trade receivables

The Group's exposure to credit risk is primarily attributable to accounts receivable from its operating activities. The amounts shown in the statement of financial position are net of expected credit losses which have been estimated by the Group in accordance with its experience and based on its assessment of the economic climate and environment. The Board of Directors believes that the book values of the accounts receivable are close to their fair value.

As at 31 December 2023 and 2024, the ageing of trade receivables is as follows:

	31-12-2023	31-12-2024
Not Expired	116,798	182,060
0 to 90 days	47,474	31,317
90 to 180 days	15,283	8,415
180 to 360 days	22,191	10,066
More than 360 days	185,329	140,118
Accounts receivable	**387,075**	**371,976**
Not Expired	(5,903)	(4,261)
0 to 90 days	(6,268)	(4,057)
90 to 180 days	(4,947)	(3,654)
180 to 360 days	(9,775)	(8,131)
More than 360 days	(87,433)	(95,064)
Expected credit losses	**(114,326)**	**(115,167)**
Total trade receivables	**272,749**	**256,809**

Credit risk is monitored on an ongoing basis and can be summarised as follows:

- regular customers are analysed on an aggregate basis (homogeneous group) and expected credit losses are calculated using a collections matrix, which is based on the history of past collections adjusted for the expected future evolution of collections, in order to calculate the uncollectability rate;
- the balances of operators, agents and others are analysed individually and the expected credit losses are calculated taking into account the age of each balance, the existence of disputes, the current financial situation of each third party and the future expectation of receiving the respective amounts owed.

Cash and cash equivalents

The existing guarantees and sureties for some operators and agents are not material. As at 31 December 2023 and 2024, the Group's credit risk associated with this type of asset (cash and cash equivalents except cash), whose counterparties are financial institutions, is detailed as follows:

	31-12-2023	31-12-2024
A	60	136
A-	4,791	1,671
BBB+	4,709	6,114
BBB	5,536	12
BBB-	674	64
B+	1	0
B-	1,419	511
no rating	81	13
Total	**17,271**	**8,522**

The ratings information was taken from Reuters, based on the ratings assigned by the three main ratings agencies (Standard & Poor's, Moody's and Fitch).

B) Liquidity risk

Prudent liquidity risk management implies maintaining an adequate level of cash and cash equivalents to fulfil the responsibilities assumed, associated with the negotiation of credit lines with financial institutions. Under the model adopted, the Group has:

b.1) Commercial paper programmes used of Euro 518.5 million, of which Euro 39.5 million issued under programmes without underwriting. The total amount contracted under underwriting programmes is Euro 875 million, corresponding to sixteen programmes with six banking institutions, Euro 775 million of which bear interest at market rates and Euro 100 million are issued at fixed rates.

b.2) Bonds by private and direct offer in the amount of Euro 400 million.

Based on the estimated cash flows and taking into account compliance with any covenants normally existing in loans payable, management regularly monitors the Group's liquidity reserve forecasts, including the amounts of unused credit lines, cash and cash equivalents.

Of the borrowings (excluding finance leases), in addition to being subject to the Group's compliance with its obligations (operational, legal and tax) 100% are subject to Cross default and Pari Passu clauses, 96% are subject to Negative Pledge clauses and 71% are subject to Ownership clauses.

In addition, around 19% of the total borrowings require that consolidated net financial debt does not exceed up to 3 times EBITDA after consolidated lease payments, around 4% require that consolidated net financial debt does not exceed up to 3.5 times EBITDA after consolidated lease payments, around 15% require that consolidated net financial debt does not exceed up to 4 times EBITDA after payment of consolidated leases, around 6% require that consolidated net financial debt does not exceed up to 4.5 times EBITDA after payment of consolidated leases, and around 7% require that consolidated net financial debt does not exceed up to 5 times EBITDA after payment of consolidated leases.

Net Financial Debt = Borrowings - Leases - Cash and Cash Equivalents

EBITDA = Operating profit + Depreciation, amortisation and impairment losses + Restructuring costs + Losses / (gains) on disposal of assets + Other non-recurring costs / (gains)

EBITDA after leases = EBITDA - Lease payments (principal and interest)

The table below shows the Group's liabilities by contractual residual maturity intervals. The amounts shown in the table are the contractual cash flows, undiscounted, payable in the future and including the interest on these liabilities.

	31-12-2023				31-12-2024			
	Less than 1 year	Between 1 to 5 years	More than 5 years	Total	Less than 1 year	Between 1 to 5 years	More than 5 years	Total
Borrowings:	**237,069**	**1,140,692**	**356,208**	**1,733,969**	**241,954**	**988,551**	**317,725**	**1,548,230**
Bond loans	78,743	349,008	-	427,751	62,192	339,167	-	401,359
Commercial paper	69,279	600,809	-	670,088	101,484	418,394	-	519,878
Bank overdrafts	9,668	-	-	9,668	360	-	-	360
Leases	79,379	190,875	356,208	626,462	77,918	230,990	317,725	626,633
Accounts payable – Trade payables	243,991	-	-	243,991	190,158	-	-	190,158
Accounts payable - other	50,349	5,460	39,266	95,075	35,086	8,159	33,950	77,195
Derivative financial instruments	441	1,036	-	1,477	184	-	-	184
Total	**531,850**	**1,147,188**	**395,474**	**2,074,512**	**467,382**	**996,710**	**351,675**	**1,815,767**

C) Market risk

Exchange rate risk

Exchange rate risk is essentially related to exposure arising from payments made to suppliers of terminal equipment, telecommunications equipment and audiovisual content producers for the mobile telecommunications, pay-TV and audiovisual businesses, respectively. Commercial transactions between the Group and these suppliers are mainly denominated in US dollars.

Considering the accounts payable balance resulting from transactions denominated in a currency other than the group's functional currency, the Group contracts or may contract financial instruments, namely short-term currency forwards in order to hedge the risk associated with these balances (Note 17).

The Group has investments in foreign entities whose assets and liabilities are exposed to exchange rate variations (the Group has two subsidiaries in Mozambique, Lusomundo Moçambique and Mstar, whose functional currency is the Meticais, and two in Angola, Finstar and ZAP Media, whose functional currency is the Kwanza). The Group has not adopted any policy of hedging the risks of exchange rate variations of these companies in the Group's cashflows in foreign currency. A sensitivity analysis was carried out considering a 10% strengthening or weakening of the functional currencies of the various financial investments on 31 December 2024. As a result, the value of the financial investments would be lower by 3,096 thousand euros (2023: 2,410 thousand euros) or higher by 3,785 thousand euros (2023: 2,946 thousand euros), respectively, and these changes would be recognised in equity. This sensitivity analysis does not consider the gains or losses that financial investments would recognise in the income statement as a result of these exchange rate variations.

The following table shows the Group's exposure to exchange rate risk as at 31 December 2023 and 2024, based on the statement of financial position values of the Group's financial assets and liabilities (values expressed in local currency).

	31-12-2023			31-12-2024		
	US Dollar	Sterling Pound	Metical	US Dollar	Sterling Pound	Metical
Assets						
Accounts receivable – Trade receivables	6,911	-	-	7,608	-	-
Accounts receivable - Other	2	2	-	2	-	-
Cash and cash equivalents	40	1	13	548	(1)	-
Total financial assets	**6,953**	**3**	**13**	**8,158**	**(1)**	**-**
Liabilities						
Accounts payable – Trade payables	5,025	-	-	6,170	-	-
Accounts payable - Other	146	6	-	436	35	-
Total financial liabilities	**5,171**	**6**	**-**	**6,606**	**35**	**-**
Net financial position on the balance sheet	**1,782**	**(3)**	**13**	1,572	(36)	-

NOS uses a sensitivity analysis technique that measures the estimated changes in earnings and capital from the strengthening or weakening of the Euro against other currencies and against the rates applied on 31 December 2024, for each class of financial instruments, keeping the other variables constant. This analysis is for illustrative purposes only, as in practice exchange rates rarely change in isolation.

The sensitivity analysis was performed considering a 10% strengthening or weakening of the Euro against all other currencies. Therefore, pre-tax profits would have increased by Euro 161 thousand (2023: increased by Euro 179 thousand) or decreased by Euro 132 thousand (2023: decreased by Euro 146 thousand), respectively.

D) Interest rate risk

The risk of interest rate fluctuations can translate into a cash flow risk or a fair value risk, depending on whether variable or fixed interest rates have been negotiated.

The borrowings by the Group (with the exception of a Euro 100 million commercial paper programme with a fixed rate and the leases contracted) have variable interest rates, which exposes the Group to interest rate cash flow risk. To mitigate this risk, the Group adopts a hedging policy, allowing it to contract financial instruments interest rate derivatives, with the aim of protecting future interest payments on bond loans and other loans (see Note 25).

The NOS Group uses a sensitivity analysis technique which measures the estimated impact on results and capital of an immediate increase or decrease of 0.25% (25 basis points) in market interest rates, compared to the rates applied on the date of the statement of financial position, for each class of financial instrument, keeping all other variables constant. This analysis is for illustrative purposes only, as in practice market rates rarely change in isolation.

The sensitivity analysis is based on the following assumptions:

- changes in market interest rates affect interest income or expense on variable financial instruments;
- changes in market interest rates only affect interest income or expense in relation to financial instruments with fixed interest rates if they are recognised at fair value;
- changes in market interest rates affect the fair value of derivative financial instruments and other financial assets and liabilities;

- changes in the fair value of derivative financial instruments and other financial assets and liabilities are estimated by discounting future cash flows from net present values, using year-end market rates.

Under these assumptions, a 0.25% increase or decrease in market interest rates for unhedged or variable rate loans as at 31 December 2024 would result in an increase or decrease in annual pre-tax profit of approximately Euro 1.4 million and Euro 1.8 million respectively (2023: Euro 1.7 million and Euro 1.8 million).

Regarding contracted interest rate swaps, the sensitivity analysis, which measures the estimated impact of an immediate increase or decrease of 0.25% (25 basis points) in market interest rates, results in variations compared to the current fair value of the instruments of more than Euro 49 million (2023: approximately Euro 79 thousand more) and Euro 44 million less (2023: approximately Euro 69 thousand less).

4.2. Capital risk management

The aim of capital risk management is to safeguard the continuity of the Group's operations, with an adequate return for shareholders and generating benefits for all interested third parties.

The Group's policy is to contract loans with financial entities, mainly at the level of the parent company, NOS, which in turn grants loans to its subsidiaries and associates. In the case of joint ventures, which contract the financing in their own name, NOS intervenes in the contracting and is part of the guarantee of fulfilment of the financing. This policy is aimed at optimising the capital structure with a view to greater tax efficiency and reducing the average cost of capital.

In order to maintain or adjust the capital structure, the Group may adjust the amounts of dividends to be distributed to shareholders, issue new shares, dispose of assets to reduce liabilities or launch share buyback programmes.

As applied by other entities operating in the market in which the Group's operations operate, the Group manages capital based on the net financial debt/EBITDA ratio. Net financial debt is calculated as the total of current and non-current borrowings, excluding finance leases related to contracts for the acquisition of capacity use rights and other long-term contracts, less cash and cash equivalents, less cash and cash equivalents. The internal ratio set as a target is a debt level of less than 3 times EBITDA.

	31-12-2023	31-12-2024
Financial debt (Note 25 - Loans - amortised cost)	1,107,507	921,597
Cash and cash equivalents (Note 22)	(18,158)	(9,084)
Net financial debt	**1,089,349**	**912,513**
Leases (Note 25)	626,462	626,633
Total net debt	**1,715,811**	**1,539,146**
EBITDA (1)	716,669	767,625
EBITDA after lease payments (2)	603,200	644,935
Net financial debt / EBITDA after lease payments	1.81	1.41
Net debt / EBITDA	2.39	2.01

(1) EBITDA = Operating Profit + Depreciation, Amortisation and Impairment Losses + Restructuring Costs + Losses/(Gains) on disposal of assets + Other Non-Recurring Costs/(Gains).
(2) EBITDA after leases = EBITDA - lease payments (principal and interest) (Note 25.3).

Estimated Fair Value

	31-12-2023			
	Level 1	Level 2	Level 3	Total
Assets				
Other non-current financial assets (Note 15)	-	-	6,028	6,028
Interest rate derivatives (Note 17)	-	5,386	-	5,386
Exchange rate derivatives (Note 17)	-	197	-	197
	-	**5,583**	**6,028**	**11,611**
Liabilities				
Interest rate derivatives (Note 17)	-	1,036	-	1,036
Exchange rate derivatives (Note 17)	-	441	-	441
	-	**1,477**	**-**	**1,477**

	31-12-2024			
	Level 1	Level 2	Level 3	Total
Assets				
Other non-current financial assets (Note 15)	-	-	9,762	9,762
Interest rate derivatives (Note 17)	-	2,457	-	2,457
Exchange rate derivatives (Note 17)	-	838	-	838
	-	**3,295**	**9,762**	**13,057**
Liabilities				
Interest rate derivatives (Note 17)	-	184	-	184
Exchange rate derivatives (Note 17)	-	-	-	-
	-	**184**	**-**	**184**

The levels of the fair value hierarchy, as set out in IFRS 13 - Fair Value Measurement, are defined as follows:

- Level 1 - Financial instruments valued based on quotes from active markets to which the company has access. This category includes securities valued based on executable prices (with immediate liquidity) published by external sources.
- Level 2 - Financial instruments whose valuation is based on observable data, directly or indirectly, in active markets. This category includes securities valued on the basis of bids provided by external counterparties and internal valuation techniques that exclusively use observable market data.
- Level 3 - All financial instruments valued at fair value that do not fall into levels 1 and 2.

Available-for-sale assets were valued using the discounted cash flow method (level 3).

The calculation of the fair value of interest rate swap derivatives was based on the estimate of discounted future cash flows, based on the expected market interest rate curve calculated by the entities with which the swaps were contracted (level 2).

The fair value of exchange rate forwards is calculated based on the spot exchange rate (level 2).

5. Perimeter change

During the year ended 31 December 2023 there were the following changes to the perimeter:

- incorporation of the company Ten Twenty One, S.A., in February 2023, whose main activity is the provision of engineering and consultancy services in the area of information, communication and electronic technologies;
- disposal of the stake held in Big Picture 2 Films (20%), in June 2023, for the amount of Euro 50 thousand (Note 12);
- acquisition of BLU, S.A., in March 2023, whose main activity is the provision of telecommunications services, establishment, management and operation of telecommunications networks, and subsequent merger into NOS Comunicações, in May 2023. This merger had no material impact on the Group's consolidated financial statements;
- acquisition of a stake in the company BrightCity, S.A. (50%), in September 2023, for Euro 255 thousand (Note 12) and shareholder loans totalling Euro 129 thousand.

Following the acquisition of BLU, S.A., NOS carried out an assessment of the fair value of the assets acquired and liabilities assumed through this operation. The breakdown of the net assets acquired, and the goodwill calculated in the context of this transaction is as follows:

	Book value	Adjustments to fair value	Fair value
Acquired assets			
Charges for contracts with customers	-	316	316
Accounts receivable	141	-	141
Deferred costs	21	-	21
Cash and cash equivalents	158	-	158
	320	**316**	**636**
Acquired liabilities			
Deferred tax liabilities	-	71	71
Accounts payable	120	-	120
Taxes payable	7	-	7
Deferred income	26	-	26
	153	**71**	**224**
Total net assets acquired	**167**	**245**	**412**
Goodwill			**-**
Purchase price			**412**

The difference between the amount paid and the net assets acquired was allocated in full to the company's customer portfolio, considering the rationale behind the acquisition operation.

BLU, S.A.'s contribution to the net profit and revenue for the period ended 30 September 2023 was Euro 72 thousand and Euro 275 thousand respectively, corresponding to the 3-month period (March to May, the date of the merger).

The net cash flows from the acquisition of BLU, S.A. resulted in a payment of Euro 192 thousand, included in the cash flows from Investing Activities (Price paid: Euro 350 thousand; Cash and cash equivalents: Euro 158 thousand).

Following the acquisition of the stake in BrightCity, S.A., NOS carried out an assessment of the fair value of the assets acquired and liabilities assumed through this operation. The breakdown of the net assets acquired, and the goodwill calculated under this transaction is as follows:

	Book value	Adjustments to fair value	Fair value
Acquired Assets			
Tangible and intangible assets	63	595	658
Accounts receivable	530	-	530
Tax receivables	153	-	153
Deferred costs	6	-	6
Cash and cash equivalents	123	-	123
	875	**595**	**1,470**
Acquired Liabilities			
Deferred tax liabilities	-	134	134
Borrowings	256	-	256
Accounts payable	568	-	568
Taxes payable	2	-	2
	826	**134**	**960**
Total net assets acquired	**49**	**461**	**510**
Total net assets acquired (50%)	**25**	**231**	**255**
Goodwill			**-**
Acquisition price (Note 12)			**255**

The difference between the amount paid and the net assets acquired was allocated in full to the company's Intangible Assets, considering the intellectual property owned/developed by the company.

The net value of the assets and liabilities acquired is recognised under "Investments in joint ventures and associates".

During the year ended 31 December 2024 the following changes to the perimeter took place:

- acquisition of 20% of the capital of the company DareData, S.A., specialising in the development of data infrastructures and projects based on generative Artificial Intelligence (AI) and machine learning, for the sum of 2 million euros, through the NOS 5G Fund (Note 15).

6. Segment reporting

The business segments are as follows:

- Telco - provision of TV, Internet (fixed and mobile) and voice (fixed and mobile) services and includes the following entities: NOS Technology, Per-mar, Sontária, NOS SGPS, NOS Açores, NOS Property, NOS Madeira, NOS SA, NOS Audio - Sales and Distribution, Teliz Holding, NOS Sistemas, NOS Sistemas España, NOS Inovação, NOS Internacional SGPS, NOS Corporate Centre, NOS Wholesale, NOS 5G Fund, NOS Mediação Seguros, Finstar, ZAP Media, Mstar, Upstar, Dualgrid, Ten Twenty One and BrightCity.

- Audiovisuals - provision of services for the publishing and sale of videograms, distribution of films, operation of cinemas and acquisition/negotiation of rights for subscription television and VOD (video-on-demand) and includes the following entities: NOS Audiovisuais, NOS Cinemas, Lusomundo Moçambique, Lda. ("Lusomundo Moçambique"), Lusomundo Imobiliária 2, S.A. ("Lusomundo Imobiliária 2"), Lusomundo Sociedade de Investimentos Imobiliários, SGPS, S.A. ("Lusomundo SII"), Empracine - Empresa Promotora de Atividades Cinematográficas, Lda. ("Empracine"), NOS Audio SGPS and Dreamia S.L..

Profit/ loss, assets, liabilities, investments in joint ventures and associates and investments in property, plant and equipment, intangible assets, charges for contracts with customers and rights of use, by segment, for the years ended 31 December 2023 and 2024, are as follows:

	Telco		Audiovisuals		Eliminations		Group	Group
	4Q 23	12M 23	4Q 23	12M 23	4Q 23	12M 23	4Q 23	12M 23
Revenue:								
Services rendered	360,686	1,404,144	18,377	81,633	(8,790)	(33,790)	370,273	1,451,987
Sales	33,450	100,161	3,466	16,393	(72)	(277)	36,844	116,277
Other income	7,037	28,440	399	1,410	(210)	(660)	7,226	29,190
	401,173	**1,532,745**	**22,242**	**99,436**	**(9,072)**	**(34,727)**	**414,343**	**1,597,454**
Costs, losses, and gains:								
Payroll	18,178	78,633	3,214	11,576	(1)	(3)	21,391	90,206
Direct costs	99,434	357,052	4,399	22,377	(6,424)	(25,038)	97,409	354,391
Cost of products sold	37,497	100,659	820	3,778	(10)	(26)	38,307	104,411
Marketing and advertising	20,456	47,157	1,067	4,185	(3,464)	(12,382)	18,059	38,960
Support services	24,119	91,885	1,008	3,060	(1,075)	(3,311)	24,052	91,634
External supplies and services	36,407	139,080	2,230	8,416	1,902	6,033	40,539	153,529
Other operating costs / (gains)	232	797	139	259	-	-	371	1,056
Indirect taxes	8,840	35,616	30	97	-	-	8,870	35,713
Provisions and adjustments	1,904	11,477	(194)	(592)	-	-	1,710	10,885
	247,067	**862,356**	**12,713**	**53,156**	**(9,072)**	**(34,727)**	**250,708**	**880,785**
EBITDA	**154,106**	**670,389**	**9,529**	**46,280**	**-**	**-**	**163,635**	**716,669**
Inter-segment debits	857	2,786	(857)	(2,786)	-	-	-	-
Operating profit/ (loss) before depreciation, amortisation and impairment losses and non-recurring costs / (gains)	153,249	667,603	10,386	49,066	-	-	163,635	716,669
Depreciation, amortisation and impairment losses	115,954	455,504	7,830	28,134	-	-	123,784	483,638
Non-recurring costs / (gains)	(32,385)	(31,601)	100	420	-	-	(32,285)	(31,181)
Profit/ (loss) before losses/(gains) in subsidiaries, financial results and taxes	**69,680**	**243,700**	**2,456**	**20,512**	**-**	**-**	**72,136**	**264,212**
Losses / (gains) in subsidiaries, net	(908)	(5,908)	626	827	-	-	(282)	(5,081)
Financing costs	19,194	63,389	509	1,904	-	-	19,703	65,293
Foreign exchange losses / (gains), net	124	79	25	9	-	-	149	88
Losses / (gains) on financial assets, net	921	(5,766)	(3,287)	(3,291)	2,238	9,274	(128)	217
Other financial costs / (income), net	859	3,586	9	21	-	-	868	3,607
	20,190	**55,380**	**(2,118)**	**(530)**	**2,238**	**9,274**	**20,310**	**64,124**
Profit before tax	**49,490**	**188,320**	**4,574**	**21,042**	**(2,238)**	**(9,274)**	**51,826**	**200,088**
Income tax	(2,686)	16,320	(410)	2,434	-	-	(3,096)	18,754
Net profit/ (loss)	**52,176**	**172,000**	**4,984**	**18,608**	**(2,238)**	**(9,274)**	**54,922**	**181,334**
Total Assets		**3,431,933**		**249,264**		**(212,217)**		**3,468,980**
Total Liabilities		**2,427,390**		**99,715**		**(52,812)**		**2,474,293**
Investments in joint ventures and associates		**27,896**		**1,544**		**-**		**29,440**
Capex	**108,715**	**438,206**	**7,248**	**36,638**	**-**	**-**	**115,963**	**474,844**
EBITDA - Capex	**44,534**	**229,397**	**3,138**	**12,428**	**-**	**-**	**47,672**	**241,825**

	Telco		Audiovisuals		Eliminations		Group	Group
	4Q 24	12M 24	4Q 24	12M 24	4Q 24	12M 24	4Q 24	12M 24
Revenue:								
Services rendered	380,086	1,480,331	22,093	84,162	(9,157)	(34,789)	393,022	1,529,704
Sales	40,317	115,209	4,647	16,877	(61)	(205)	44,903	131,881
Other income	9,782	33,551	313	1,156	(3)	(29)	10,092	34,678
	430,185	**1,629,091**	**27,053**	**102,195**	**(9,221)**	**(35,023)**	**448,017**	**1,696,263**
Costs, losses, and gains:								
Payroll	20,848	79,948	3,346	12,222	(3)	(3)	24,191	92,167
Direct costs	102,557	376,931	4,534	21,594	(6,362)	(25,080)	100,729	373,445
Cost of products sold	41,065	107,588	1,034	3,974	(9)	(40)	42,090	111,522
Marketing and advertising	10,572	43,247	1,198	3,331	(3,227)	(12,358)	8,543	34,220
Support services	20,673	88,169	773	3,055	(795)	(3,303)	20,651	87,921
External supplies and services	43,402	152,966	2,434	9,427	1,176	5,761	47,012	168,154
Other operating costs / (gains)	353	828	360	435	-	-	713	1,263
Indirect taxes	3,107	31,866	40	266	-	-	3,147	32,132
Provisions and adjustments	17,307	26,645	1,093	1,170	-	-	18,400	27,815
	259,884	**908,188**	**14,812**	**55,474**	**(9,220)**	**(35,023)**	**265,476**	**928,639**
EBITDA	170,301	720,903	12,241	46,721	(1)	-	182,541	767,624
Inter-segment debits	455	2,629	(455)	(2,629)	-	-	-	-
Operating profit/(loss) before depreciation, amortisation and impairment losses and non-recurring costs / (gains)	169,846	718,274	12,696	49,350	(1)	-	182,541	767,624
Depreciation, amortisation and impairment losses	113,130	468,190	9,792	30,652	-	-	122,922	498,842
Non-recurring costs / (gains)	(39,589)	(111,517)	700	844	-	-	(38,889)	(110,673)
Profit/ (loss) before losses/(gains) in subsidiaries, financial results and taxes	96,305	361,601	2,204	17,854	(1)	-	98,508	379,455
Losses / (gains) in subsidiaries, net	(97,764)	(104,915)	114	166	96,490	96,491	(1,160)	(8,258)
Financing costs	10,163	65,876	3,065	4,141	-	-	13,228	70,017
Foreign exchange losses / (gains), net	(408)	(308)	(26)	(14)	-	-	(434)	(322)
Losses / (gains) on financial assets, net	(615)	(915)	(223)	(3,059)	223	2,923	(615)	(1,051)
Other financial costs / (income), net	887	3,523	2	14	-	-	889	3,537
	(87,737)	**(36,739)**	**2,932**	**1,248**	**96,713**	**99,414**	**11,908**	**63,923**
Profit before tax	184,042	398,340	(728)	16,606	(96,714)	(99,414)	86,600	315,532
Income tax	15,938	41,099	(991)	1,359	(136)	-	14,811	42,458
Net profit/ (loss)	**168,104**	**357,241**	**263**	**15,247**	**(96,578)**	**(99,414)**	**71,789**	**273,074**
Total Assets		3,488,160		369,463		(497,836)		3,359,787
Total Liabilities		2,275,523		395,683		(398,397)		2,272,809
Investments in joint ventures and associates		36,271		1,379		-		37,650
Capex	**98,611**	**412,400**	**18,700**	**33,845**	**-**	**-**	**117,311**	**446,245**
EBITDA - Capex	**71,235**	**305,874**	**(6,004)**	**15,505**	**(1)**	**-**	**65,230**	**321,379**

EBITDA = Operating profit + Depreciation, amortisation and impairment losses + Restructuring costs + Losses / (gains) on disposal of assets + Other non-recurring costs / (gains) + management fees between companies / segments.

CAPEX = Increases in tangible fixed assets, intangible assets, charges for contracts with clients and rights of use

During the year ended 31 December 2024, the NOS group's revenue came predominantly from the domestic market (Telco segment 98% and Audiovisuals segment 90%).

In the year ended 31 December 2024, the NOS group posted revenue and EBITDA growth of 6.2% and 7.1% respectively. The Telco segment grew by 6.3% and 7.5%, respectively, and the Audio segment by 2.8% and 1.0%.

In the year ended 31 December 2024, revenues of 3 million euros were eliminated between the telco and audiovisuals segments, and 32 million euros between the audiovisuals segment and the telco segment

In the year ended 31 December 2024, no material impairment losses were recognised on non-financial assets in any of the segments.

Transactions between segments are carried out under market conditions and terms, comparable to transactions with third parties.

On 31 December 2024, fully consolidated foreign companies represent less than 1% of assets (31 December 2023: less than 1%) and their turnover is less than 0.1% of consolidated turnover.

7. Financial assets and liabilities classified according to IFRS 9 categories – financial instruments

The accounting policies set out in IFRS 9 for financial instruments have been applied to the following items:

	31-12-2023					
	Financial assets	**Derivative financial instruments**	**Financial liabilities**	**Total financial assets / liabilities**	**Non-financial assets / liabilities**	**Total**
Assets						
Other non-current financial assets (Note 15)	6,028	-	-	6,028	-	6,028
Derivative financial instruments (Note 17)	-	5,583	-	5,583	-	5,583
Accounts receivable – trade receivables (Note 19)	340,780	-	-	340,780	-	340,780
Accounts receivable - other (Note13)	31,361	-	-	31,361	11,597	42,958
Cash and cash equivalents (Note 22)	18,158	-	-	18,158	-	18,158
Total financial assets	**396,327**	**5,583**	**-**	**401,910**	**11,597**	**413,507**
Liabilities						
Borrowings (Note 25)	-	-	1,733,969	1,733,969	-	1,733,969
Derivative financial instruments (Note 17)	-	1,477	-	1,477	-	1,477
Accounts payable – trade payables (Note 28)	-	-	243,991	243,991	-	243,991
Accounts payable - other (Note 27)	-	-	94,871	94,871	204	95,075
Accrued costs (Note 30)	-	-	203,943	203,943	-	203,943
Total financial liabilities	**-**	**1,477**	**2,276,774**	**2,278,251**	**204**	**2,278,455**

	31-12-2024					
	Financial assets	Derivative financial instruments	Financial liabilities	Total financial assets / liabilities	Non-financial assets / liabilities	Total
Assets						
Other non-current financial assets (Note 15)	9,762	-	-	9,762	-	9,762
Derivative financial instruments (Note 17)	-	3,295	-	3,295	-	3,295
Accounts receivable – trade receivables (Note 19)	331,461	-	-	331,461	-	331,461
Accounts receivable - other (Note13)	53,987	-	-	53,987	8,757	62,744
Cash and cash equivalents (Note 22)	9,084	-	-	9,084	-	9,084
Total financial assets	**404,294**	**3,295**	**-**	**407,589**	**8,757**	**416,346**
Liabilities						
Borrowings (Note 25)	-	-	1,548,230	1,548,230	-	1,548,230
Derivative financial instruments (Note 17)	-	184	-	184	-	184
Accounts payable – trade payables (Note 28)	-	-	190,158	190,158	-	190,158
Accounts payable - other (Note 27)	-	-	77,001	77,001	194	77,195
Accrued costs (Note 30)	-	-	219,496	219,496	-	219,496
Total financial liabilities	**-**	**184**	**2,034,885**	**2,035,069**	**194**	**2,035,263**

The balances of taxes recoverable and taxes payable, given their nature, were considered to be financial instruments not covered by IFRS 7. Similarly, the deferred costs and deferred income items were not considered in this breakdown as they are made up of balances not covered by IFRS 7.

The Group's Board of Directors believes that the fair value of the classes of financial instruments recorded at amortised cost and those recorded at the present value of payments does not differ significantly from their book value, given the contractual conditions of each of these financial instruments.

8. Tangible fixed assets

During the years ended 31 December 2023 and 2024, the movements under this heading were as follows:

	31-12-2022	Increases	Disposals and write-offs	Transfers and others	31-12-2023
Cost of acquisition					
Land and natural resources	519	-	-	-	519
Buildings and other constructions	264,259	(715)	(9,564)	27,686	281,666
Basic equipment	2,909,175	48,154	(231,008)	202,136	2,928,457
Transport equipment	514	-	-	(2)	512
Tools and utensils	1,607	-	(5)	86	1,688
Administrative equipment	195,921	1,346	(4,485)	(45,711)	147,071
Other tangible assets	44,162	139	(48)	323	44,576
Assets in progress	53,438	130,176	-	(137,674)	45,940
	3,469,595	**179,100**	**(245,110)**	**46,844**	**3,450,429**
Accumulated depreciation and impairment losses					
Buildings and other constructions	159,518	12,758	(9,564)	(19,036)	143,676
Basic equipment	1,971,674	187,989	(231,008)	98,823	2,027,478
Transport equipment	514	1	-	(4)	511
Tools and utensils	1,528	102	(5)	(640)	985
Administrative equipment	185,650	3,784	(4,439)	(44,955)	140,040
Other tangible fixed assets	43,659	534	(48)	10	44,155
	2,362,543	**205,168**	**(245,064)**	**34,198**	**2,356,845**
	1,107,052	**(26,068)**	**(46)**	**12,646**	**1,093,584**

	31-12-2023	Increases	Disposals and write-offs	Transfers and others	31-12-2024
Cost of acquisition					
Land and natural resources	519	-	-	-	519
Buildings and other constructions	281,666	-	(2,632)	13,981	293,015
Basic equipment	2,928,457	41,149	(22,927)	113,521	3,060,200
Transport equipment	512	-	(8)	2	506
Tools and utensils	1,688	-	-	122	1,810
Administrative equipment	147,071	1,223	(376)	2,332	150,250
Other tangible assets	44,576	205	(1)	363	45,143
Tangible assets in progress	45,940	127,972	-	(128,851)	45,061
	3,450,429	**170,549**	**(25,944)**	**1,470**	**3,596,504**
Accumulated depreciation and impairment losses					
Buildings and other constructions	143,676	7,238	(461)	-	150,453
Basic equipment	2,027,478	155,504	(17,774)	(1,422)	2,163,786
Transport equipment	511	1	(8)	-	504
Tools and utensils	985	222	-	-	1,207
Administrative equipment	140,040	3,405	(353)	-	143,092
Other tangible fixed assets	44,155	499	(1)	-	44,653
	2,356,845	**166,869**	**(18,597)**	**(1,422)**	**2,503,695**
	1,093,584	**3,680**	**(7,347)**	**2,892**	**1,092,809**

During the year ended 31 December 2024, the net amount of "Disposals and write-offs" corresponds predominantly to the sale of a portfolio of 80 mobile sites for Euro 57.3 million, giving rise to a net gain of Euro 34.2 million, recognised under the heading Losses / (gains) on

disposal of assets, and reflecting a deferral of Euro 20.7 million deducted from new site leases (Notes 11 and 25)

In the year ended 31 December 2023, the net amount of "Disposals and write-offs" corresponds predominantly to the sale of infrastructure and equipment replaced by newer generations and models, for approximately Euro 1 million.

Assets in progress essentially correspond to investments in telecommunications network infrastructure (fixed and mobile) made in 2024.

At 31 December 2024, the accumulated depreciation and impairment losses heading includes accumulated impairments of Euro 12 million (2023: Euro 14 million).

The net amount of "Transfers and Other" corresponds predominantly to the transfer of assets to "Intangible Assets" (Note 9).

The net value of tangible fixed assets as at 31 December 2024 is mainly made up of basic equipment, of which the following stand out:

- telecommunications network and infrastructure (fibre optic network and cabling, network equipment, and other equipment) amounting to Euro 811.8 million (31 December 2023: Euro 807.5 million);
- network terminal equipment installed in customers, included in the Basic equipment item, the net amount of which is Euro 84.7 million (31 December 2023: Euro 93.5 million).

Tangible and intangible assets include interest paid and other financial costs incurred, directly related to the construction of certain tangible or intangible assets in progress. On 31 December 2024, the total net value of these costs amounts to Euro 8.25 million (31 December 2023: Euro 9.3 million).

On 31 December 2023 and 2024, the value of commitments made to third parties regarding investments to be made is as follows:

	31-12-2023	31-12-2024
Technical investments	94,197	45,979
Investment in information systems	7,236	1,805
	101,433	**47,784**

9. Intangible assets

During the years ended 31 December 2023 and 2024, the movements under this heading were as follows:

	31-12-2022	Increases	Disposals and write-offs	Transfers and others	31-12-2023
Cost of acquisition					
Industrial property and other rights	2,103,180	24,710	(659)	(25,744)	2,101,487
Goodwill	641,400	217	-	(217)	641,400
Intangible assets in progress	27,217	92,150	-	(92,177)	27,190
	2,771,797	**117,077**	**(659)**	**(118,138)**	**2,770,077**
Accumulated amortisation and impairment losses					
Industrial property and other rights	1,559,907	110,971	(659)	(109,070)	1,561,149
Intangible assets in progress	2,332	-	-	(1,350)	982
	1,562,239	**110,971**	**(659)**	**(110,420)**	**1,562,131**
	1,209,558	**6,106**	**-**	**(7,718)**	**1,207,946**

	31-12-2023	Increases	Disposals and write-offs	Transfers and others	31-12-2024
Cost of acquisition					
Industrial property and other rights	2,101,487	6,394	(197,982)	98,656	2,008,555
Goodwill	641,400	-	-	-	641,400
Intangible assets in progress	27,190	95,583	-	(100,251)	22,522
	2,770,077	**101,977**	**(197,982)**	**(1,595)**	**2,672,477**
Accumulated amortisation and impairment losses					
Industrial property and other rights	1,561,149	161,033	(197,596)	(388)	1,524,198
Intangible assets in progress	982	-	-	1,685	2,667
	1,562,131	**161,033**	**(197,596)**	**1,297**	**1,526,865**
	1,207,946	**(59,056)**	**(386)**	**(2,892)**	**1,145,612**

As at 31 December 2024, the Accumulated depreciation and impairment losses heading includes accumulated impairments in the amount of Euro 25 million (2023: Euro 24 million).

The net amount of "Transfers and others" corresponds predominantly to the transfer of assets to "Tangible fixed assets" (Note 8).

The net amount of "Disposals and write-offs" corresponds essentially to write-offs of industrial property assets and other rights, mainly at NOS Lusomundo Audiovisuais, which had zero book value and were no longer being used by the company.

As at 31 December 2024, "Industrial property and other rights" essentially includes:

- a net amount of Euro 128.1 million (31 December 2023: Euro 135.6 million) corresponding to the acquisition of the rights to use frequencies in the 5G bands and other relevant bands (100MHz in the 3.6GHz band and 2x10MHz in the 700MHz band, also acquiring 2x5MHz in the 2100MHz band and 2x2MHz in the 900MHz band);
- a net amount of Euro 69.3 million (31 December 2023: Euro 77.5 million), mainly corresponding to the investment, net of depreciation, made in the development of the UMTS network, which includes:
    - Euro 21.9 million (31 December 2023: Euro 24.5 million) relating to the licence;

- Euro 7.3 million (31 December 2023: Euro 8.2 million) relating to the contract signed in 2002 between Oni Way and the other three mobile telecommunications operators operating in Portugal;
- Euro 2.3 million (31 December 2023: Euro 2.5 million) relating to the contribution, established in 2007, to the share capital of the Fundação para as Comunicações Móveis under the agreement signed between the Ministry of Public Works, Transport and Communications and the three telecommunications operators operating in Portugal;
- Euro 32.1 million (31 December 2023: Euro 35.9 million) relating to the Initiatives E programme; and
- Euro 3.8 million (31 December 2023: Euro 4.2 million) corresponding to the valuation of the licence within the scope of the fair value allocation resulting from the merger operation);

- a net amount of Euro 63.9 million (31 December 2023: Euro 67.7 million) corresponding to the acquisition of the rights to use frequencies (spectrum) in the 800 MHz, 1800 MHz and 2600 MHz bands, used for the development of 4th generation services (LTE - Long Term Evolution) and a net amount of Euro 2.2 million (31 December 2023: Euro 2.4 million) corresponding to the valuation of the licence within the scope of the fair value allocation resulting from the merger operation;
- a net amount of Euro 125 million relating to software (31 December 2023: Euro 171 million);
- a net amount of Euro 16.3 million (31 December 2023: Euro 16.3 million) corresponding to future rights to use films and series.

The increases in the year ended 31 December 2024 correspond predominantly to the acquisition of rights to use films and series, amounting to Euro 20.6 million, software development in the amount of Euro 55.1 million, development of box sets and applications int the amount of Euro 15.6 million and acquisition of other assets, amounting to Euro 10.7 million.

As at 31 December 2023 and 2024, intangible assets in progress break down as follows:

	31-12-2023	31-12-2024
Nature		
Development of information systems (i)	16,111	10,890
Rights to use films and series (ii)	6,483	5,283
Others	3,614	3,682
	26,208	**19,855**

i. Information systems development refers to costs with external companies and work for the company itself, related to information systems development projects, both for the telecommunications network and for internal business and administrative systems, which have not yet been finalised or put into operation.

ii. Rights to use films and series correspond to films and series that have not yet begun to be exploited.

Goodwill impairment test

Goodwill was allocated to the cash flow generating units of each reportable segment, as follows:

	31-12-2023	31-12-2024
Telco	564,799	564,799
Audiovisuals	76,601	76,601
	641,400	**641,400**

In 2024, impairment tests were performed based on valuations using the discounted cash flow method, which support the recoverability of the carrying amount of goodwill. International accounting standards state that an asset cannot be recognised at an amount higher than its recoverable amount through use (present value of future cash flows) or sale. An asset is impaired when its book value exceeds its recoverable amount. This analysis should be performed by cash-generating unit. The amounts of these evaluations are supported by historical performance and expectations of the development of the business and the respective markets, embodied in approved medium/long-term plans.

The following assumptions were made in these estimates:

	Telco segment	Audiovisual Segment	
		NOS Audiovisuais	NOS Cinemas
Discount rate (before tax)	6.0%	7.2%	8.3%
Evaluation period	5 years	5 years	5 years
EBITDA growth (2025-29)*	-3.7%	-3.4%	4.3%
Perpetuity growth rate	2.0%	2.0%	2.0%

* EBITDA = Operating Profit + Depreciation, Amortisation and Impairment Losses + Restructuring Costs + Losses/(Gains) on asset disposals + Other Non-Recurring Costs/(Gains) (CAGR - average)

In the telecommunications segment, the assumptions used are based on past performance, the evolution of the number of customers, the foreseeable evolution of regulated tariffs, current market conditions and expectations of future development.

In the cinema segment, the segment most affected by COVID-19, EBITDA growth is still justified by the prospect of activity recovering to near pre-pandemic levels.

The number of explicit years adopted in the impairment tests results from the degree of maturity of the respective businesses and market and has been determined based on what is considered most appropriate for the valuation of each cash-generating unit.

Sensitivity analyses were carried out to changes in the discount rate and perpetuity growth rate of the various segments reported, of 1 percentage point and 0.4 percentage points respectively.

In the telecommunications segment, sensitivity analyses were also performed on variations in the operating variables RGU (Revenue Generating Unit), ARPU (Average Revenue Per User), EBITDA and CAPEX, in perpetuity, of approximately 5%.

In the cinema segment, sensitivity analyses were performed to variations of approximately 5% in the projected number of tickets sold, average revenue per ticket, EBITDA and CAPEX in perpetuity.

In the audiovisual segment, sensitivity analyses were carried out to variations in the projected number of views, average revenue per view, EBITDA and CAPEX, in perpetuity, of approximately 5%.

These simulations did not result in the need to reinforce impairment.

10. Charges for contracts with clients

During the years ended 31 December 2023 and 2024, the movements under this heading were as follows:

	31-12-2022	Increases	Disposals and write-offs	31-12-2023
Cost of acquisition				
Cost of customer acquisition	623,472	66,129	-	689,601
Costs of fulfilling contracts with clients	286,840	29,810	-	316,650
	910,312	**95,939**	**-**	**1,006,251**
Accumulated amortisation and impairment losses				
Cost of customer acquisition	522,150	65,775	-	587,925
Costs of fulfilling contracts with clients	227,568	32,352	-	259,920
	749,718	**98,127**	**-**	**847,845**
	160,594	**(2,188)**	**-**	**158,406**

	31-12-2023	Increases	Disposals and write-offs	31-12-2024
Cost of acquisition				
Cost of customer acquisition	689,601	70,527	(425,647)	334,481
Costs of fulfilling contracts with clients	316,650	29,617	(159,999)	186,268
	1,006,251	**100,144**	**(585,646)**	**520,749**
Accumulated amortisation and impairment losses				
Cost of customer acquisition	587,925	67,887	(425,647)	230,165
Costs of fulfilling contracts with clients	259,920	30,992	(159,999)	130,913
	847,845	**98,879**	**(585,646)**	**361,078**
	158,406	**1,265**	**-**	**159,671**

Charges for contracts with clients refers to commissions paid to third parties and other costs related to attracting and retaining customer contracts, including portability costs. These costs are amortised, systematically, and consistently, with the transfer to customers of the goods or services to which the asset relates (between 2 and 4 years).

As at 31 December 2024, no impairment losses have been recognised.

The net amount of "Disposals and write-offs" corresponds essentially to write-offs of customer acquisition costs, mainly at NOS Comunicações, which had zero book value and were no longer being used by the company.

11. Rights of use

During the years ended 31 December 2023 and 2024, this heading was as follows:

	31-12-2022	Increases	Transfers and others	31-12-2023
Cost of acquisition				
Websites	224,319	30,203	(4,022)	250,500
Cinemas	124,323	16,652	-	140,975
Transponders	93,752	383	-	94,135
Equipment	165,910	22,020	-	187,930
Buildings	91,336	3,418	-	94,755
Shops	24,547	6,508	-	31,055
Others	83,552	3,540	15	87,111
	807,739	**82,728**	**(4,007)**	**886,460**
Depreciation and accumulated impairment losses				
Websites	69,950	17,170	-	87,120
Cinemas	97,322	9,024	-	106,346
Transponders	74,552	6,520	-	81,072
Equipment	119,138	16,470	-	135,608
Buildings	66,151	8,455	-	74,606
Shops	19,874	3,694	-	23,568
Others	63,029	4,974	(5)	71,050
	510,016	**69,360**	**(5)**	**579,370**
	297,723	**13,368**	**(4,002)**	**307,090**

	31-12-2023	Increases	Disposals and write-offs	Transfers and others	31-12-2024
Cost of acquisition					
Websites	250,500	28,914	(1,058)	(1,593)	276,763
Cinemas	140,975	9,815	-	-	150,790
Transponders	94,135	182	-	-	94,317
Equipment	187,931	15,504	(6)	-	203,429
Buildings	94,753	3,616	-	-	98,369
Shops	31,055	3,507	-	-	34,562
Others	87,111	12,037	-	-	99,148
	886,460	**73,575**	**(1,064)**	**(1,593)**	**957,378**
Depreciation and accumulated impairment losses					
Websites	87,120	20,738	(670)	-	107,188
Cinemas	106,346	7,603	-	-	113,949
Transponders	81,072	6,619	-	-	87,691
Equipment	135,608	17,044	(6)	-	152,646
Buildings	74,606	8,421	-	-	83,027
Shops	23,568	3,831	-	-	27,399
Others	71,050	7,797	-	-	78,847
	579,370	**72,053**	**(676)**	**-**	**650,747**
	307,090	**1,522**	**(388)**	**(1,593)**	**306,631**

Rights of use refers to assets associated with lease contracts which are amortised over the duration of the respective contract, except for equipment leases with a purchase option which are amortised over the estimated period of use.

As at 31 December 2024, no impairment losses have been recognised.

The net amount of "Increases" corresponds to new contracts and renegotiation of the contractual terms of leases.

12. Investments in joint ventures and associates

As at 31 December 2023 and 2024, this item is broken down as follows:

	31-12-2023	31-12-2024
Capital shares - equity equivalence		
Finstar*	22,812	28,608
Mstar	3,698	5,453
Dreamia	1,544	1,379
Other companies	1,386	2,210
	29,440	**37,650**

* Consolidated from Finstar and ZAP Media

Investments in joint ventures and associates evolved as follows in the years ended 31 December 2023 and 2024:

	12M 23	12M 24
Balance as at 1 January	**38,961**	**29,440**
Profit / (loss) for the year (Note 41)	4,227	8,258
Bright City acquisition (Note 5)	255	-
CEiiA acquisition (Note 4)	150	-
Alienation Big Picture 2 Films (Note 5)	(50)	-
Distribution/receipt of dividends	(622)	-
Changes in equity	(13,481)	(48)
Balance as at 31 December	**29,440**	**37,650**

Changes in equity correspond to changes in the equity of companies recognised using the equity method, which predominantly correspond to the exchange rate impacts of investments in currencies other than the Euro.

The assets, liabilities, and profit or loss of jointly controlled and associated companies for the periods ended 31 December 2023 and 2024 were as follows:

31-12-2023

Organisation	Non-current assets	Current assets	Non-current liabilities	Current liabilities	Equity	Revenue	Net profit/ (loss)	% Detained
Sport TV*	81,581	47,757	48	106,093	23,197	192,206	(1,188)	25.00%
Dreamia	963	12,952	7,146	4,029	2,740	17,229	(2,132)	50.00%
Finstar	44,144	130,496	-	98,622	76,018	205,495	12,176	30.00%
Mstar	871	22,476	-	13,355	9,992	27,591	5,796	30.00%
Upstar	1,420	18,377	-	15,672	4,125	17,467	1,339	30.00%
Dualgrid	4	258	-	174	88	575	7	50.00%
Dreamia S.L.	15,190	1,156	6,551	2,319	7,476	2,307	47	50.00%
BrightCity S.A.	61	1,015	-	894	182	1,388	7	50.00%
	144,234	**234,487**	**13,745**	**241,158**	**123,818**	**464,258**	**16,052**	

31-12-2024

Organisation	Non-current assets	Current assets	Non-current liabilities	Current liabilities	Equity	Revenue	Net profit/ (loss)	% Detained
Sport TV*	84,267	97,057	62	152,701	28,561	213,350	5,363	25.00%
Dreamia	985	12,752	7,500	3,958	2,279	16,673	(461)	50.00%
Finstar	30,752	131,792	24,277	56,691	81,576	112,947	13,863	30.00%
Mstar	1,383	30,338	-	20,741	10,980	30,159	6,151	30.00%
Upstar	2,029	11,154	-	8,356	4,827	14,488	596	30.00%
Dualgrid	3	342	-	227	118	609	31	50.00%
Dreamia S.L.	15,543	1,100	6,861	2,280	7,502	2,382	26	50.00%
BrightCity S.A.	2,171	2,573	271	2,032	2,441	1,741	1,152	50.00%
	137,133	**287,108**	**38,971**	**246,986**	**138,284**	**392,349**	**26,721**	

*Sport TV's annual reporting period is from 1 July to 30 June (in line with the period of the football seasons), so in the accounts presented in the tables above, revenues and net income correspond to the figures for the reported period of 12 months in 2023 and 12 months in 2024, respectively.

The indicators in the tables above do not reflect consolidation adjustments, which were considered to calculate the Group's interest in profit or loss, assets, and liabilities of jointly controlled and associated companies.

For the year ended 31 December 2023 and 2024, the assets, liabilities, and profit or loss of the jointly controlled company ZAP Media (100% owned by Finstar) are as follows:

31-12-2023

Organisation	Non-current assets	Current assets	Non-current liabilities	Current liabilities	Equity	Revenue	Net profit/ (loss)
ZAP Media	17,306	7,957	-	14,836	10,427	34,881	1,506

31-12-2024							
Organisation	Non-current assets	Current assets	Non-current liabilities	Current liabilities	Equity	Revenue	Net profit/ (loss)
ZAP Media	22,396	6,570	85	14,257	14,624	31,660	2,079

The differences between the individual accounts (prepared in accordance with Angolan regulations) and the Finstar consolidated accounts (Finstar + ZAP Media) correspond predominantly to the cancellation of balances and transactions between the companies and the adjustments resulting from the companies being in a hyperinflationary economy from 2017 until September 2019 (IAS 29) and using accounting plans different from IAS/IFRS.

The Group has several controls over the reporting process of its jointly controlled and associated companies. The amounts included in the reported financial statements are audited when legally required. In all other cases and where the audit has not been finalised, specific review procedures are performed by the Group.

The Board of Directors is convinced that the seizure of assets from Mrs. Isabel dos Santos, in this case her holdings in Finstar and ZAP Media (in which she holds 70% of the capital), does not change the control profile, in this case joint control as defined in IFRS 11.

13. Accounts receivable - Other

As at 31 December 2023 and 2024, this item is broken down as follows:

	31-12-2023		31-12-2024	
	Current	Non-current	Current	Non-current
Accounts receivable	27,234	4,392	50,558	3,923
Advances to suppliers	11,597	-	8,757	-
	38,831	**4,392**	**59,315**	**3,923**
Expected credit losses	(237)	(28)	(482)	(12)
	38,594	**4,364**	**58,833**	**3,911**

As at 31 December 2024, the Accounts receivable heading corresponds predominantly to:

- amounts to be received, arising from favourable decisions in lawsuits brought by the company and the declaration of unconstitutionality with general binding force by the Constitutional Court related to assessments of the Activity Fee, in the amount of Euro 41.3 million (Euro 22.9 million as at 31 December 2023); and
- short-term loans, medium and long-term loans and interest receivable from associated companies.

In addition, as at 31 December 2023 and 2024, advances to suppliers correspond predominantly to amounts paid under football rights contracts and other operating costs. The summary of movements in expected credit losses in other receivables is as follows:

	12M 23	12M 24
Balances as at 1 January	**1,861**	**265**
Increases (Note 37)	94	571
Decreases (Note 41)	(854)	-
Uses, transfers and others	(836)	(342)
Balances at 31 December	**265**	**494**

14. Taxes payable and recoverable

As at 31 December 2023 and 2024, this item is broken down as follows:

	31-12-2023		31-12-2024	
	Debtor	**Creditor**	**Debtor**	**Creditor**
Non-current				
Tax proceedings	-	44,009	-	41,311
Debt settlement	51	-	149	-
	51	**44,009**	**149**	**41,311**
Current				
Value Added Tax (VAT)	5,971	19,291	5,965	19,175
Corporate Income Tax (IRC)	31,063	-	-	35,859
Personal Income Tax (IRS)	-	1,715	-	1,754
Social Security	-	2,056	-	2,103
Others	16	151	14	157
	37,050	**23,213**	**5,979**	**59,048**
	37,101	**67,222**	**6,128**	**100,359**

In the year ended 31 December 2024, the item "Tax proceedings" includes liabilities relating to ongoing tax proceedings, of which the following stand out:

- Assignment of future receivables: in the year ended 31 December 2010, NOS SA was notified of the Tax Inspection Report for the 2008 period, which considered that the addition of Euro 100 million, relating to the initial price of future receivables assigned for securitisation, was undue in the calculation of taxable profit for the year. In this regard, considering the principle of periodisation of taxable profit, NOS SA was subsequently notified of the undue deduction of the amount of Euro 20 million in the calculation of taxable profit for the years 2009 to 2013. The basis for this correction is the understanding that the increase made in 2008 was not accepted because it did not comply with the provisions of article 18 of the IRC Code. Therefore, also in the following years, the deduction corresponding to the credits generated in those years, to comply with the annual amortisation contracted under the operation (20 million per year for 5 years) will have to be eliminated in the calculation of taxable profit. NOS SA challenged the decisions relating to the financial years 2008 to 2013. Regarding 2008, the Administrative and Fiscal Court of Oporto ruled unfavourably in March 2014, and the company has lodged the appropriate appeal.

In March 2021, NOS SA was notified of the judgement handed down by the Court of Appeal, which in turn dismissed it. Dissatisfied with the decision, NOS filed an appeal with the Supreme Administrative Court.

In May 2022, the NOS was notified of a decision that did not admit the review appeal and in relation to which an appeal was lodged with the Constitutional Court, with suspensive effects on its transit. Alongside this appeal, an application was submitted to recognise the nullity of the decision, due to a lack of reasoning. Both applications were rejected and the means of reaction in the case relating to 2008 have been exhausted. The same outcome can be expected in the cases relating to 2009 to 2013.

As at 31 December 2023 and 2024, the amounts receivable and payable relating to corporate income tax are broken down as follows:

	31-12-2023	31-12-2024
Estimated current income tax	(19,011)	(57,439)
Payments on account	48,129	17,984
Withholdings made to/from third parties	1,011	1,253
Others	934	2,343
	31,063	**(35,859)**

15. Other non-current financial assets

As at 31 December 2023 and 2024, this item is broken down as follows:

	31-12-2023	31-12-2024
DareData	-	2,000
TechTransfer Fund	1,355	1,606
Didimo	1,415	1,415
Seems Possible	1,200	1,784
Reckon.ai	854	1,004
SkillAugment	175	547
MindProber	500	890
Others	529	516
	6,028	**9,762**

During the year ended 31 December 2023, NOS reinforced its investment in the TechTransfer Fund, in the company Reckon.ai and in the company Seems Possible. During the same period, fair value variations were recognised on the valuations of the TechTransfer Fund and the company SkillAugmented, in the amounts of 81 thousand euros and 125 thousand euros, respectively.

During the year ended 31 December 2024, NOS acquired a stake in the company DareData (Note 5), for the amount of Euro 2 million. During the same period, changes in fair value were recorded in the TechTransfer Fund (in the amount of Euro 251 thousand), in the company Seems Possible (in the amount of Euro 584 thousand), in Reckon.ai (in the amount of Euro 150 thousand), in the company SkillAugment (in the amount of Euro 372 thousand) and in the company MindProber (in the amount of Euro 390 thousand).

16. Taxes and levies

NOS and its subsidiaries are subject to Corporate Income Tax (IRC) at a rate of 21% on taxable income (taxable profit minus any tax losses that may be deducted) plus a Municipal Surcharge at a maximum rate of 1.5% on taxable income, thus reaching an aggregate rate of approximately 22.5%. In addition, with the austerity measures laid down in Law 66-B/2012, of 31 December, and the respective additions by Law 114/2017, of 29 December, the State Surcharge is levied on taxable profit at 3% on the part of each company's taxable profit that exceeds Euro 1.5 million up to Euro 7.5 million, at 5% on the part of each company's taxable profit that exceeds Euro 7.5 million up to Euro 35 million, and at 9% on the part of each company's taxable profit that exceeds Euro 35 million.

When calculating taxable profit, amounts that are not accepted (or should be considered) for tax purposes are added to (or subtracted from) the accounting result. These differences between the accounting and tax results can be of a temporary or permanent nature.

NOS is taxed in accordance with the special regime for the taxation of groups of companies (RETGS), which includes companies in which it holds, directly or indirectly, at least 75% of the capital and which meet the requirements established in Article 69 of the IRC Code.

In 2024, the following companies are part of the RETGS:

- NOS SGPS (parent company)
- Empracine
- Lusomundo Imobiliária
- Lusomundo SII
- NOS Açores
- NOS Audiovisuais
- NOS Audiovisuais SGPS
- NOS Cinemas
- NOS Comunicações
- NOS Inovação
- NOS Internacional SGPS
- NOS Audio - Sales and Distribution
- NOS Madeira
- NOS Mediação de Seguros
- NOS Sistemas
- NOS Technology
- NOS Wholesale
- NOS Corporate Centre
- NOS Property
- Per-mar
- Sontária
- Teliz
- Ten Twenty One

According to the legislation in force, tax returns are subject to review and correction by the tax authorities for a period of four years, except for cases where tax losses or other credits have been assessed, namely tax benefits, the deadline for which, in these cases, coincides with the

time limit for their use. It should be noted that these deadlines may be suspended if inspections, claims, or appeals are in progress.

The Board of Directors of NOS, supported by information from its tax advisors, believes that any revisions and corrections to these tax returns, as well as other tax contingencies, will not have a significant effect on the consolidated financial statements as at 31 December 2024.

A) Deferred taxes

NOS and its subsidiaries recognised deferred taxes related to temporary differences between the tax and accounting bases of assets and liabilities, as well as tax losses carried forward existing at the date of the statement of financial position.

The movement in deferred tax assets and liabilities in the years ended 31 December 2023 and 2024 was as follows:

	31-12-2022	Net profit/ (loss) (Note B)	Equity	31-12-2023
Deferred tax assets				
Expected credit losses	9,288	(2,079)	-	7,209
Inventories	2,579	1,874	-	4,453
Other provisions and adjustments	44,626	(3,657)	-	40,969
Intra-group capital gains and other transactions	26,851	(7,329)	-	19,522
Assets recognised under IFRS 16	6,160	3,235	-	9,395
Derivatives	50	11	297	358
	89,554	**(7,945)**	**297**	**81,906**
Deferred tax liabilities				
Revaluation of assets within the scope of the allocation of fair value to the assets acquired in the merger operation	2,235	126	-	2,361
Derivatives	2,487	-	(1,220)	1,267
Others	2,785	(915)	-	1,870
	7,507	**(789)**	**(1,220)**	**5,498**
Net deferred taxes	**82,047**	**(7,156)**	**1,517**	**76,408**

	31-12-2023	Net profit/ (loss) (Note B)	Equity	31-12-2024
Deferred tax assets				
Expected credit losses	7,209	159	-	7,368
Inventories	4,453	(334)	-	4,119
Other provisions and adjustments	40,969	(6,069)	-	34,900
Intra-group capital gains and other transactions	19,522	307	-	19,829
Assets recognised under IFRS 16	9,395	(9,395)	-	-
Derivatives	358	40	(359)	39
	81,906	**(15,292)**	**(359)**	**66,255**
Deferred tax liabilities				
Revaluation of assets within the scope of the allocation of fair value to the assets acquired in the merger operation	2,361	(374)	-	1,987
Liabilities recognised under IFRS 16	-	2,542	-	2,542
Derivatives	1,267	162	(684)	745
Others	1,870	(341)	-	1,529
	5,498	**1,989**	**(684)**	**6,803**
Net deferred taxes	**76,408**	**(17,281)**	**325**	**59,452**

During the year ended 31 December 2024, the NOS Group derecognised the deferred tax (against tax receivable) resulting from the consideration, for tax purposes, of the application of IFRS 16 following the publication of Circular 3/2024.This changes the Tax Authority's previous understanding regarding the amortisation period of Right of Use assets, now allowing depreciation to occur over the contract period in situations where the lease does not transfer ownership of the underlying asset to the lessee at the end of the lease term, nor is it estimated that a purchase option will be exercised.

As at 31 December 2024, deferred tax assets relating to other provisions and adjustments refer predominantly to:

- impairments, accelerated depreciation beyond the depreciation accepted for tax purposes and other adjustments to tangible and intangible assets in amount of Euro 19.6 million (31 December 2023: Euro 25.6 million); and
- miscellaneous provisions and share plan amounting to Euro 15.2 million (31 December 2023: Euro 15.4 million).

Asset revaluations refer to the valuation of telecommunications licences and other assets when Group companies merged.

As at 31 December 2024, deferred tax assets totalling Euro 0.4 million were still to be recorded, corresponding predominantly to tax losses.

Deferred tax assets have been recognised to the extent that it is probable that taxable profits will arise in the future that can be used to recover tax losses or deductible tax differences. This assessment was based on the business plans of the Group companies, which are periodically reviewed and updated.

As at 31 December 2024, the tax rate used to calculate deferred tax assets relating to tax losses was 20% (2023: 21%). In the case of temporary differences, the rate used was 21.5% (2023:

22.5%) increased to a maximum of 4.7% (2023: 6.2%) of the state surcharge when it was considered likely that the temporary differences would be taxed in the estimated period of application of that rate. Tax benefits, as they are deductions from taxable income, are considered at 100%, and in some cases their full acceptance is dependent on the approval of the authorities granting such tax benefits.

Under the terms of article 88 of the CIRC, the company is additionally subject to autonomous taxation on a set of charges at the rates set out in the aforementioned article.

With the State Budget for 2023, tax losses no longer have a time limit for carrying them forward, but their deduction is limited to 65% of the taxable profit generated.

B) Reconciliation of the effective tax rate

For the years ended 31 December 2023 and 2024, the reconciliation between the nominal and effective tax rates is as follows:

	4Q 23	12M 23	4Q 24	12M 24
Profit/ (loss) before tax	51,826	200,088	86,600	315,532
Nominal tax rate	22.5%	22.5%	22.5%	22.5%
Expected tax	**11,661**	**45,020**	**19,485**	**70,995**
Permanent differences	(1,107)	(2,079)	1,553	(5,175)
Tax benefits	(10,979)	(25,501)	257	(26,364)
State surcharge	10	6,440	7,359	18,297
Autonomous taxation	148	586	122	748
Others	(2,829)	(5,712)	(13,964)	(16,042)
Income tax	**(3,096)**	**18,754**	**14,812**	**42,458**
Effective tax rate	-6.0%	9.4%	17.1%	13.5%
Current tax	(13,681)	10,207	9,121	25,177
Deferred tax	10,585	8,547	5,690	17,281
	(3,096)	**18,754**	**14,811**	**42,458**

In the years ended 31 December 2023 and 2024, permanent differences are broken down as follows:

	4Q 23	12M 23	4Q 24	12M 24
Losses/(gains) in subsidiaries (Note 41)	(432)	(5,081)	(1,160)	(8,258)
Reinvestment of capital gains i)	(3,674)	(3,674)	-	(24,128)
Others	(813)	(485)	8,064	9,386
	(4,919)	**(9,240)**	**6,904**	**(23,000)**
	22.5%	22.5%	22.5%	22.5%
	(1,107)	**(2,079)**	**1,553**	**(5,175)**

i) During the year ended 31 December 2024, the heading Reinvestment of capital gains refers predominantly to capital gains generated from the sale of mobile sites, taxed at 50%, as a result of the intention to reinvest the realisation value of assets held for more than a year.

In addition, the Tax benefits heading corresponds to the recording of deferred taxes and the use of tax benefits for which no deferred taxes were recorded by the Group: tax benefit - SIFIDE (System of Tax Incentives for Business R&D) - provided for in Law 40/2005, of 3 August; tax benefit - RFAI (Investment Support Tax Regime) - provided for in Law 10/2009, of 10 March; tax benefit for the Incentive to Capitalise Companies (ICE) - provided for in Law 20/2023, of 17 May; and provisions for tax incentives used.

17. Derivative financial instruments

Interest rate derivatives

As at 31 December 2024, NOS has contracted 3 interest rate swaps totalling Euro 180 million (31 December 2023: Euro 180 million) and 9 zero cost collars totalling Euro 377.5 million (31 December 2023: Euro 377.5 million).

Exchange rate derivatives

On the closing date of the statement of financial position there were outstanding currency forwards in the amount of USD 16,866 thousand (31 December 2023: USD 19,916 thousand).

	31-12-2023				
	Notional	Asset		Liability	
		Current	Non-current	Current	Non-current
Interest rate derivatives	557,500	-	5,386	-	1,036
Exchange rate derivatives	19,916	-	197	441	-
	577,416	**-**	**5,583**	**441**	**1,036**

	31-12-2024				
	Notional	Asset		Liability	
		Current	Non-current	Current	Non-current
Interest rate derivatives	557,500	-	2,457	184	-
Exchange rate derivatives	16,866	811	27	-	-
	574,366	**811**	**2,484**	**184**	**-**

The movements in the years ended 31 December 2023 and 2024 are as follows:

	31-12-2022	Profit/ (loss)	Capital	31-12-2023
Fair value of interest rate derivatives	10,947	-	(6,597)	4,350
Fair value of exchange rate derivatives	(95)	(35)	(114)	(244)
Derivatives	**10,852**	**(35)**	**(6,711)**	**4,106**
Deferred tax liabilities	(2,487)	-	1,220	(1,267)
Deferred tax assets	50	11	297	358
Deferred tax	**(2,437)**	**11**	**1,517**	**(909)**
	8,415	**(24)**	**(5,194)**	**3,197**

	31-12-2023	Profit/ (loss)	Capital	31-12-2024
Fair value of interest rate derivatives	4,350	-	(2,077)	2,273
Fair value of exchange rate derivatives	(244)	447	635	838
Derivatives	**4,106**	**447**	**(1,442)**	**3,111**
Deferred tax liabilities	(1,267)	32	490	(745)
Deferred tax assets	358	(154)	(165)	39
Deferred tax	**(909)**	**(122)**	**325**	**(706)**
	3,197	**325**	**(1,117)**	**2,405**

18. Inventories

As at 31 December 2023 and 2024, this item is broken down as follows:

	31-12-2023	31-12-2024
Inventories		
Telco	63,317	56,550
Audiovisuals	608	608
	63,925	**57,158**
Impairment of inventories		
Telco	(15,710)	(15,922)
	(15,710)	**(15,922)**
	48,215	**41,236**

Inventories are essentially made up of:

- Telco: mobile devices and their accessories for sale, such as mobile phones and tablets, equipment for installation in customers' homes, such as *set-top-boxes*, *routers* and alarms, and network and infrastructure equipment;
- Audiovisuals: Products for sale in the cinema bar, such as ingredients for making popcorn and drinks, sweets, packaging, among others.

The movements in inventory impairments were summarised as follows:

	12M 23	12M 24
Balance as at 1 January	**9,161**	**15,710**
Increases /(decreases) - Cost of products sold (Note 35)	7,771	989
Charge-off / Other	(1,222)	(777)
Balance as at 31 December	**15,710**	**15,922**

19. Accounts receivable – trade receivables

As at 31 December 2023 and 2024, this item is broken down as follows:

	31-12-2023	31-12-2024
Accounts receivable	387,075	371,976
Amounts to be invoiced	68,031	74,652
	455,106	**446,628**
Expected credit losses	(114,326)	(115,167)
	340,780	**331,461**

The amounts to be invoiced correspond mainly to the value of contractual obligations that have already been met or partially met and will subsequently be invoiced.

The movements in adjustments for expected credit losses were summarised as follows:

	12M 23	12M 24
Balances as at 1 January	**106,111**	**114,326**
Increases and decreases (Note 37)	11,941	18,231
Charge-off / Other	(3,726)	(17,390)
Balances at 31 December	**114,326**	**115,167**

Charge-off/ Other correspond predominantly to the derecognition of accounts receivable, after all the collection measures considered appropriate to recover the credit have been exhausted or frustrated.

20. Costumer contract assets

As at 31 December 2024, Costumer contract assets, amounting to Euro 31.7 million (31 December 2023: Euro 47 million), correspond to discounts granted to customers at the time of sale of equipment (included in telecommunications packages) and which are allocated to monthly fees/service provision, as part of the allocation of revenue to the different performance obligations, in line with IFRS 15. These assets are deferred when the equipment is sold and recognised over the period of the contract (service provision).

21. Deferred costs

As at 31 December 2023 and 2024, this item is broken down as follows:

	31-12-2023	31-12-2024
Expenses related to specific projects for business customers	14,248	17,516
Programming costs i)	9,617	19,137
Maintenance and repair	1,817	1,547
Insurance	1,450	1,400
Advertising	374	683
Others ii)	16,919	15,327
	44,425	**55,610**

i) Programming costs correspond to the costs inherent in making channels available, namely fixed fees billed in advance. This cost is recognised in the period in which the channel is made available and broadcast, and recognised as a programming cost in the Consolidated Income Statement

ii) "Other" includes deferred costs relating mainly to expenses to be recognised for various external supplies and services, such as specialised work, maintenance and repair work and others, invoiced in advance by suppliers (quarterly or annual invoicing), with the respective expense being recognised in the income statement as the service is provided. The increase in this item is predominantly the result of expenses paid in advance at the beginning of each year for the current financial year.

The item varies essentially due to the increase in programming costs.

22. Cash and cash equivalents

As at 31 December 2023 and 2024, this item is broken down as follows:

	31-12-2023	31-12-2024
Cash	887	562
Term deposits	9,785	6,401
Demand deposits	7,486	2,121
Cash and cash equivalents	**18,158**	**9,084**
Bank overdrafts (Note 25)	9,668	360
Cash and cash equivalents for the purposes of the Cash Flow Statement	**8,490**	**8,724**

As at 31 December 2024, "Term deposits" have a maturity of less than 10 days and bear interest at market rates.

23. Equity

23.1. Share Capital

As at 31 December 2023 and 2024, NOS' share capital amounts to Euro 855,167,890.80. As at 31 December 2024, the share capital is represented by 515,161,380 registered shares, in book-entry form, with a nominal value of 1.66 euros each (2023: 1.66 euros each).

The main shareholders as at 31 December 2023 and 2024 are:

	31-12-2023		31-12-2024	
	Number of of shares	% Capital capital	Number of of shares	% Capital capital
Sonaecom, SGPS, S.A.	192,527,188	37.37%	192,527,188	37.37%
ZOPT, SGPS, S.A.	134,322,269	26.07%	134,322,269	26.07%
Mubadala Investment Company	25,758,569	5.00%	25,758,569	5.00%
Total	**352,608,026**	**68.45%**	**352,608,026**	**68.45%**

In accordance with Article 20(1)(b) and (c) and Article 21 of the Portuguese Securities Code, a qualifying holding of the Company's share capital and voting rights, calculated in accordance with Article 20 of the Portuguese Securities Code, is attributable to the following entities:

- shareholding attributable to Sonaecom and, therefore, to the entities in a control relationship with Sonaecom, SGPS, S.A., namely Sontel, BV and Sonae, SGPS, S.A., directly or indirectly controlled by Efanor Investimentos, SGPS, S.A.. With effect from 29 November 2017, Efanor Investimentos SGPS, S.A. ceased to have a controlling shareholder under the terms and for the purposes of articles 20 and 21 of the Portuguese Securities Code.

- participation attributable to ZOPT and, therefore, to the companies Kento Holding Limited and Unitel International Holdings, BV, as well as to Mrs Isabel dos Santos, being (i) Kento Holding Limited and Unitel International Holdings, BV, companies directly and indirectly controlled by Mrs Isabel dos Santos, and (ii) ZOPT, a company controlled by its shareholders Kento Holding Limited and Unitel International Holdings, BV.

Note: the calculation of the percentage of voting rights does not consider own shares held by the Company.

23.2. Share premium

On 27 August 2013, following the completion of the merger between ZON and Optimus SGPS, the Company's share capital was increased by Euro 856,404,278, corresponding to the total number of shares issued (206,064,552 shares), based on the closing stock market price on 27 August 2013. The capital increase is detailed as follows:

- share capital of Euro 2,060,646;

- share premiums totalling Euro 854,343,632.

In addition, an amount of Euro 125,000 was deducted from the share premiums for the respective capital increase.

On 21 April 2022, the Annual General Meeting of NOS SGPS shareholders approved an increase in share capital by incorporation of share premium, in the amount of Euro 850,016,277.00, by increasing the nominal value of all the shares representing the share capital by 1.65 euros, with the nominal value of each share rising to 1.66 euros.

As at 31 December 2024, the amount of the share premium is Euro 4,202,356 (31 December 2023: Euro 4,202,356).

The share premium is subject to the regime applicable to legal reserves and can only be used:

- to cover the part of the loss recognised in the balance sheet for the year that cannot be covered by the use of other reserves;
- to cover the part of the losses carried forward from the previous financial year that cannot be covered by the profit for the year or by the use of other reserves;
- for incorporation into the capital.

23.3. Own shares

Commercial legislation on treasury shares requires the existence of a non-distributable reserve of an amount equal to the purchase price of those shares, which becomes unavailable if those shares remain in the company's possession. In addition, the applicable accounting rules stipulate that gains or losses on the sale of own shares are recorded in reserves.

As at 31 December 2024, there were 3,845,224 own shares, representing 0.7464% of the share capital (31 December 2023: 3,736,403 own shares, representing 0.7253% of the share capital). Movements during the years ended 31 December 2023 and 2024 were as follows:

	Quantity	Value
Balance as at 1 January 2023	**4,008,391**	**15,968**
Acquisition of own shares	1,234,638	5,171
Distribution of own shares under share plans	(1,479,000)	(5,970)
Distribution of own shares as part of other remuneration	(27,626)	(110)
Balance as at 31 December 2023	**3,736,403**	**15,059**
Balance as at 1 January 2024	**3,736,403**	**15,059**
Acquisition of own shares	1,212,419	4,261
Distribution of own shares under share plans	(1,072,203)	(4,197)
Distribution of own shares as part of other remunerations	(31,395)	(121)
Balance as at 31 December 2024	**3,845,224**	**15,002**

23.4. Reserves

Legal reserve

Commercial legislation and the NOS articles of association establish that at least 5% of the annual net profit must be allocated to the legal reserve, until it represents 20% of the share capital. This reserve is not distributable except in the event of the liquidation of the Company, but can be used to absorb losses, after all other reserves have been used, or to be incorporated into the share capital.

Other reserves

Under Portuguese law, the amount of distributable reserves is determined in accordance with the company's individual financial statements, presented in accordance with IAS/IFRS. Therefore, as at 31 December 2024, NOS had reserves which, by their nature, are considered distributable in the amount of approximately Euro 78.3 million, not including the net profit/(loss) for the year.

Dividends

The General Meeting held on 5 April 2023 approved the Board of Directors' proposal to pay an ordinary dividend per share of Euro 0.278 and an extraordinary dividend of Euro 0.152, totalling Euro 221,519 thousand. The dividend attributable to own shares totalled approximately Euro 1,532 thousand. The dividends were paid on 21 April 2023.

The General Meeting held on 12 April 2024 approved the Board of Directors' proposal to pay an ordinary dividend per share of Euro 0.35, totalling Euro 180,306 thousand. The dividend attributable to own shares totalled approximately Euro 1,348 thousand. The dividends were paid on 24 April 2024.

24. Non-controlling interests

The movements in non-controlling interests that occurred and the results attributable to non-controlling interests for the years ended 31 December 2023 and 2024 are as follows:

	31-12-2022	Result attributable	Others	31-12-2023
NOS Madeira	5,432	578	(4)	6,006
NOS Azores	819	(239)	(1)	579
	6,251	**339**	**(5)**	**6,585**

	31-12-2023	Result attributable	Others	31-12-2024
NOS Madeira	6.,006	1,068	(2)	7,072
NOS Azores	579	(253)	(1)	325
	6,585	**815**	**(3)**	**7,397**

25. Borrowings

As at 31 December 2023 and 2024, the breakdown of borrowings is as follows:

	31-12-2023		31-12-2024	
	Current	Non-current	Current	Non-current
Loans - nominal value	**152,268**	**951,000**	**160,360**	**758,500**
Bond loans	75,000	350,000	60,000	340,000
Commercial paper	67,600	601,000	100,000	418,500
Bank overdrafts	9,668	-	360	-
Loans - accruals and deferrals	**5,422**	**(1,183)**	**3,676**	**(939)**
Loans - amortised cost	**157,690**	**949,817**	**164,036**	**757,561**
Leases	**79,379**	**547,083**	**77,918**	**548,715**
	237,069	**1,496,900**	**241,954**	**1,306,276**

The average cost of financing of the lines used during the year ended 31 December 2024 was approximately 3.8% (2023: 3.4%).

The average cost of global financing (used and unused lines) during the year ended 31 December 2024 was approximately 3.9% (2023: 3.5%).

As at 31 December 2024, there are no defaults in terms of principal, interest, conditions for redemption on loans payable or other commitments.

As at 31 December 2024, approximately 92% of the borrowings were indexed to ESG performance objectives (70% indexed to KPIs from the Sustainability Linked Financing Framework published by NOS, and 22% to ESG ratings or classifications).

The financing contracted under the Sustainability Linked Financing Framework is indexed to the objective of reducing greenhouse gas emissions from own operations (scope 1 and 2 emissions) by at least 80% by 2025, compared to 2019.

The verification date for this indicator will be 31 December 2025. Regarding ESG ratings and classifications, these lines are indexed to the CDP (Carbon Disclosure Project) and Moody's classifications, observed annually until the maturity of the contracts.

To date, no risk of non-compliance with the performance targets established in NOS' financing contracts is anticipated.

During the year ended 31 December 2024, the movements in borrowings are detailed as follows:

	Bank overdrafts	Bond loans	Commercial Paper	Leases	Total
Balances as at 1 January 2024	**9,668**	**427,751**	**670,088**	**626,462**	**1,733,969**
Loan Receipts	-	50,000	282,200	-	332,200
Loan repayments	-	(75,000)	(432,300)	(89,206)	(596,506)
Change in Bank Overdrafts	(9,308)	-	-	-	(9,308)
Interest and commissions paid	(94)	(20,036)	(25,228)	(33,484)	(78,842)
Loan Commissions	-	496	2,270	-	2,766
Interest expense (Note 42)	94	18,148	22,848	33,484	74,574
Leases (Note 11)	-	-	-	73,575	73,575
Deferred gain allocated to leases (Note 8)	-	-	-	15,803	15,803
Balances as at 31 December 2024	**360**	**401,359**	**519,878**	**626,633**	**1,548,230**

25.1. Bond loans

As at 31 December 2024, NOS has a total of Euro 400 million in bonds issued:

- A Euro 15 million bond loan placed in July 2021 by BPI and maturing in July 2026. The loan bears interest at a variable rate, indexed to Euribor and paid quarterly.
- A Euro 75 million bond loan placed in March 2022 by Caixa Geral de Depósitos and maturing in March 2027. The loan bears interest at a variable rate, indexed to Euribor and paid every six months.
- Bond loan totalling Euro 75 million, placed in July 2022 by BPI and maturing in March 2027. The loan bears interest at a variable rate, indexed to Euribor and paid quarterly.
- A Euro 50 million bond loan placed in April 2023 by BPI and maturing in January 2028. The loan bears interest at a variable rate, indexed to Euribor and paid quarterly.
- A Euro 75 million bond loan placed in April 2023 by Caixa Geral de Depósitos and maturing in April 2028. The loan bears interest at a variable rate, indexed to Euribor and paid every six months.
- A Euro 60 million bond loan placed in December 2023 by BPI and maturing in June 2025. The loan bears interest at a variable rate, indexed to Euribor and paid every six months.
- A Euro 50 million bond loan placed in January 2024 by Caixa Geral de Depósitos and maturing in July 2026. The loan bears interest at a variable rate, indexed to Euribor and paid quarterly.

As at 31 December 2024, the net amount of Euro 1,358 thousand was added to the value of these loans, corresponding to the respective interest and commissions, recorded under Loans - accruals and deferrals.

25.2. Commercial paper

As at 31 December 2024, the company had a debt of Euro 518.5 million in the form of commercial paper, of which Euro 39.5 million was issued under programmes without underwriting. The total amount contracted under underwriting programmes is Euro 875 million, corresponding to 16 programmes with 6 banks, 775 million of which bear interest at market rates and 100 million are issued at fixed rates. Commercial paper programmes with a maturity of more than 1 year amounting to Euro 715 million are classified as non-current (of which Euro 379 million are used as at 31 December 2024), since the company has the capacity to unilaterally renew current issues until the programmes mature and they are underwritten by the organiser. As such, the amount in question, despite having a current maturity, has been classified as non-current for the purposes of presentation in the statement of financial position.

As at 31 December 2024, the net amount of Euro 1,378 thousand was deducted from the value of these loans, corresponding to the respective interest and commissions, recorded under Loans - accruals and deferrals.

25.3. Leases

As at 31 December 2023 and 2024, leases refer predominantly to rental contracts for telecommunications towers, cinemas, equipment, shops and vehicles, exclusive acquisition of satellite capacity and rights to use distribution network capacity.

The movements in lease liabilities in the years ended 31 December 2023 and 2024 are as follows:

	31-12-2022	Right of use (Note 11)	Interest (Note 42)	Payments	Others	31-12-2023
Websites	483,561	30,203	26,575	(61,626)	1,505	480,218
Cinemas	29,364	16,652	1,016	(9,846)	-	37,186
Transponders	28,656	383	1,151	(11,838)	-	18,352
Equipment	39,080	22,020	837	(15,782)	(9,511)	36,644
Buildings	26,831	3,418	583	(6,864)	5,867	29,835
Shops	5,273	6,508	219	(3,765)	-	8,235
Others	17,442	3,544	597	(7,730)	2,139	15,992
	630,207	**82,728**	**30,978**	**(117,451)**	**-**	**626,462**

	31-12-2023	Right of use (Note 11)	Interest (Note 42)	Payments	Others	31-12-2024
Websites	480,218	28,914	28,111	(57,802)	15,803	495,244
Cinemas	37,186	9,815	1,016	(9,689)	-	38,328
Transponders	18,352	182	763	(9,419)	-	9,878
Equipment	36,644	15,504	1,441	(18,295)	-	35,294
Buildings	29,835	3,616	1,019	(8,848)	-	25,622
Shops	8,235	3,507	370	(3,621)	-	8,491
Others	15,992	12,037	764	(15,017)	-	13,776
	626,462	**73,575**	**33,484**	**(122,691)**	**15,803**	**626,633**

The "Other" item essentially refers to the deferred gain on the sale of the Towers to Cellnex.

Leases - payments	31-12-2023	31-12-2024
Up to 1 year	111,908	109,300
Between 1 and 5 years	296,689	330,640
More than 5 years	391,690	373,700
	800,287	**813,640**
Future financial costs (lease)	(173,825)	(187,007)
Current lease value	**626,462**	**626,633**

Leases - current value	31-12-2023	31-12-2024
Up to 1 year	79,379	77,918
Between 1 and 5 years	190,875	230,990
More than 5 years	356,208	317,725
	626,462	**626,633**

As at 31 December 2023 and 2024, the maturity of the loans is as follows:

	31-12-2023			31-12-2024		
	Less than 1 year	Between 1 and 5 years	More than 5 years	Less than 1 year	Between 1 and 5 years	More than 5 years
Bond loans	78,743	349,008	-	62,192	339,167	-
Commercial paper	69,279	600,809	-	101,484	418,394	-
Bank overdrafts	9,668	-	-	360	-	-
Leases	79,379	190,875	356,208	77,918	230,990	317,725
	237,069	**1,140,692**	**356,208**	**241,954**	**988,551**	**317,725**

26. Provisions

As at 31 December 2023 and 2024, the breakdown of provisions is as follows:

	31-12-2023	31-12-2024
Ongoing legal proceedings and others - i)	30,345	25,542
Decommissioning and removal of assets - ii)	22,254	24,241
Contingent liabilities - iii)	22,908	22,908
Miscellaneous contingencies	4,647	2,559
Transformation and restructuring plan (Note 39)	-	8,617
	80,154	**83,867**

i) As at 31 December 2024, the amount shown under "Ongoing legal proceedings and others" corresponds to provisions to cover several legal and other proceedings in progress;

ii) The amount shown under "Decommissioning and removal of assets" essentially refers to estimated future costs, discounted to present value, according to the end of use of the spaces where the telecommunications towers and cinemas are located;

iii) The amount shown under "Contingent liabilities" refers to several provisions created for present non-probable obligations, within the scope of the merger process by incorporation of Optimus SGPS (concentration of business activities), of which the following stand out: Extraordinary contribution to the compensation fund for the net costs of the universal electronic communications service (CLSU): The extraordinary contribution to the compensation fund for the net costs of the universal electronic communications service (CLSU) is provided for in Articles 17 to 22 of Law 35/2012 of 23 August. From 1995 until June 2014, MEO, SA (formerly PTC) provided the universal electronic communications service on an exclusive basis, having been administratively appointed to do so by the government (e.g. it was chosen to provide this service without recourse to a tendering procedure). This constitutes an illegality recognised by the Court of Justice of the European Union, which in its decision of June 2014 ordered the Portuguese state to pay a fine of Euro 3 million. According to Article 18 of Law 35/2012, of 23 August, the net costs incurred by the operator responsible for the universal service approved by ANACOM must be shared by the other companies offering public communications networks and electronic communications services accessible to the public in Portugal. NOS is covered by this extraordinary contribution, and MEO has requested payment of the CLSU to the compensation fund for the various periods in which it was responsible for the service. In fact, according to the law, the compensation fund can be called upon to compensate for the net costs of the universal electronic communications service, including, as in this case, those relating to the period prior to the designation of the respective provider by tender, whenever, cumulatively, there is (i) the existence of net costs, that are considered excessive, the amount of which is approved by ANACOM, following an audit of the preliminary calculation and respective supporting documents, which are transmitted by the universal service provider and (ii) the universal service provider requests the Government to compensate the net costs that have been approved under the terms of the previous paragraph. Therefore:

- In 2013, ANACOM decided to approve the final results of the audit of the CLSU submitted by MEO for the 2007-2009 financial year, totalling approximately Euro 66.8 million, a decision that was contested by NOS; On January 2015, the liquidation notes relating to NOS, SA, NOS Madeira and NOS Açores were issued for that period, in the amount of Euro 18.6 million, which were, in turn, subject to legal challenge and for which guarantees were presented by NOS SGPS (Note 48), in order to avoid the promotion of the respective tax enforcement proceedings. The guarantees were accepted by ANACOM.

- In 2014, ANACOM decided to approve the final results of the audit of the CLSU submitted by MEO for the financial years 2010 to 2011, totalling approximately Euro 47.1 million, a decision that was also contested by NOS. In February 2016, the liquidation notes for NOS, SA, NOS Madeira and NOS Açores for that period were issued, totalling Euro 13 million, which were also contested and for which guarantees were once again presented by NOS SGPS, in order to avoid the promotion of the respective tax enforcement proceedings. The guarantees were also accepted by ANACOM.

- In 2015, ANACOM decided to approve the final results of the audit of the CLSU submitted by MEO for the financial years 2012 and 2013, totalling approximately Euro 26 million and Euro 20 million, respectively, a decision which, like the previous ones, was

contested by NOS. In December 2016, the liquidation notes for NOS, SA, NOS Madeira and NOS Açores were issued for that period, totalling Euro 13.6 million, which were contested by NOS and for which guarantees have also been presented by NOS SGPS in order to avoid the promotion of the respective tax enforcement proceedings. The guarantees have also been accepted by ANACOM.

- In 2016, ANACOM approved the results of the audit into the net costs of providing the universal service for the period from January to June 2014, provided by MEO, totalling Euro 7.7 million, which NOS contested under the usual terms.

- In 2017, NOS, SA, NOS Madeira and NOS Açores were notified of ANACOM's decision on the entities obliged to contribute to the compensation fund and to set the amounts of the contributions relating to the CLSU to be compensated for the months of 2014 in which MEO was still the Universal Service provider, which provides for a contribution totalling approximately Euro 2.4 million for all these companies. In December 2017, liquidation notes were issued for NOS, SA, NOS Madeira and NOS Açores for that period, totalling approximately Euro 2.4 million, which were contested by NOS and for which guarantees have also been presented by NOS SGPS in order to avoid the promotion of the respective tax enforcement proceedings. The guarantees have also been accepted by ANACOM.

It is the opinion of the Board of Directors of NOS that these extraordinary contributions to the Universal Service required of it, which relate to the period prior to the designation of the universal service provider by tender, violate the Universal Service Directive. Furthermore, considering the legal framework and the law in force since NOS began its activity, the requirement to pay the extraordinary contribution violates the principle of protection of trust, recognised at a legal and constitutional level in the Portuguese legal system. For these reasons, NOS has challenged in court both the approval of the results of the audit of the net costs of the universal service for the pre-tender period and the settlement of each and every one of the extraordinary contributions demanded of it. On September 2021 and January 2024, the Lisbon Administrative Court ruled that the actions relating to NOS SA's administrative challenge of the results of the audit of CLSU 2007-2009 and CLSU 2013, respectively, were unfounded, which NOS appealed in October 2021 and February 2024. In May 2024, the Lisbon Tax Court dismissed the challenges to the CLSU 2007-2009 extraordinary contributions of NOS Açores and NOS Madeira, as well as the CLSU 2014 of NOS, SA, decisions which the companies in question appealed in December 2024. It is the belief of the Board of Directors, supported by the lawyers accompanying the cases, that both the challenges and the appeals will be successful. iv) The amount shown under "Miscellaneous contingencies" refers to provisions to cover risks related to events/differences of a different nature which may result in cash outflows when resolved, and other probable liabilities resulting from different transactions carried out in previous years and for which the outflow of funds is probable, namely costs charged to the current period or to past periods, for which it is not possible to estimate with great reliability when the expense will be realised.

In the year ended 31 December 2023, the movements recorded under provisions are as follows:

	31-12-2022	Increase	Decrease	Others	31-12-2023
Ongoing legal proceedings and others	32,158	5,141	(3,743)	(3,211)	30,345
Decommissioning and removal of assets	22,294	836	(67)	(809)	22,254
Contingent liabilities	22,908	-	-	-	22,908
Miscellaneous contingencies	3,907	3,590	-	(2,850)	4,647
	81,267	**9,567**	**(3,810)**	**(6,870)**	**80,154**

During the year ended 31 December 2024, the movements recorded under provisions are as follows:

	31-12-2023	Increase	Decrease	Others	31-12-2024
Ongoing legal proceedings and others	30,345	2,833	(4,774)	(2,862)	25,542
Decommissioning and removal of assets	22,254	903	(262)	1,346	24,241
Contingent liabilities	22,908	-	-	-	22,908
Miscellaneous contingencies	4,647	2,684	-	(4,772)	2,559
Transformation and restructuring plan (Note 39)	-	8,617	-	-	8,617
	80,154	**15,037**	**(5,036)**	**(6,288)**	**83,867**

During the years ended 31 December 2023 and 2024, the increases refer predominantly to compensation to employees, provisions for legal proceedings and others plus the respective interest and charges, and the reductions refer predominantly to revaluation, prescription, and favourable decisions on several contingencies.

The movements recorded under "Other" correspond predominantly to compensation payments to employees (under "Miscellaneous contingencies") and unfavourable decisions in legal proceedings (under "Ongoing legal proceedings and others").

The net movements in reinforcements and reductions for the years ended 31 December 2023 and 2024, reflected in the income statement under Provisions, are broken down as follows:

	12M 23	12M 24
Provisions and adjustments (Note 37)	(1,161)	9,093
Restructuring costs (Note 39)	3,590	11,301
Interest - Dismantling of assets	769	641
Others	2,559	(11,034)
Increases and decreases in provisions	**5,757**	**10,001**

27. Accounts payable - other

As at 31 December 2023 and 2024, this item is broken down as follows:

	31-12-2023	31-12-2024
Non-current		
Contract law	44,726	42,109
	44,726	**42,109**
Current		
Suppliers of tangible and intangible fixed assets	34,701	24,851
Contract law	2,881	2,888
Advances from customers	204	194
Advances on investment grants	7,470	2,225
Others	5,093	4,928
	50,349	**35,086**
	95,075	**77,195**

The heading "Contractual law" corresponds to the liability to be settled over 20 years, relating to the contractual right acquired with the conclusion of the agreements between NOS Comunicações, S.A., NOS Technology, S.A. and Vodafone Portugal, Comunicações Pessoais, S.A. with a view to sharing mobile network support infrastructure (passive infrastructure such as towers and masts) and active mobile network (active radio equipment such as antennas, amplifiers and other equipment), as communicated to the market on 22 October 2020.

28. Accounts payable – Trade payables

As at 31 December 2024, accounts payable to suppliers and other entities, amounting to Euro 190 million (31 December 2023: Euro 244 million), correspond to amounts payable arising from the company's operating activities.

During the year ended 31 December 2024, the decrease in accounts payable to suppliers is predominantly due to the conclusion of the dispute over the undefined interconnection prices for 2001 (Note 47.6).

29. Supplier financing agreements

NOS has agreed supplier financing agreements with four banks. In these agreements, NOS delivers to the banks the credits to be paid to its suppliers, instructing the banks to pay on the respective due date. Suppliers, on their own initiative, can bring forward the receipt of these credits. The participation of our suppliers in these financing agreements has no impact on our payment terms and conditions, nor are any guarantees provided by NOS.

Our current payment terms with most of our suppliers vary between 30 and 90 days.

Consequently, the amounts owed to our suppliers under these agreements are shown under Accounts payable - suppliers and Accounts payable - other in the consolidated statement of financial position. Likewise, the amounts paid under these agreements are shown under Payments to suppliers in the consolidated statement of cash flows.

As at 31 December 2023 and 2024, the amount of outstanding obligations that the Company has delivered to the banks is as follows:

	31-12-2023	31-12-2024
Accounts payable (Note 27 and 28)	82,423	72.978
Advanced by suppliers	56,746	39.273

In addition, in the periods ended 31 December 2023 and 2024, there were no business combinations or material exchange differences, nor transfers between Accounts payable and Borrowings.

30. Accruals

As at 31 December 2023 and 2024, this item is broken down as follows:

	31-12-2023	31-12-2024
Current		
Invoices to be issued by operators i)	43,161	54,632
Holidays, holiday pay and other staff costs	24,956	25,313
Investment in tangible fixed assets and intangible assets	30,778	19,740
Advertising	19,591	18,915
Specialised jobs	20,580	18,161
Content and film rights	13,412	15,857
Expenses related to specific projects for business clients	16,475	13,643
Programming services	9,278	13,128
Energy and water	6,168	8,385
Fees (Anacom + Cinema Law)	-	7,403
Commissions	5,349	5,891
Collection costs	4,108	4,143
Conservation and repair	2,664	3,126
Other accruals	7,423	11,159
	203,943	**219,496**

i) Invoices to be issued by operators corresponds predominantly to interconnection costs for international traffic and the use of roaming services not yet invoiced.

31. Deferred income

As at 31 December 2023 and 2024, this item is broken down as follows:

	31-12-2023		31-12-2024	
	Current	Non-current	Current	Non-current
Advance invoicing	42,964	-	46,517	-
	42,964	**-**	**46,517**	**-**

This item essentially relates to the invoicing of television services for the month following the reporting period and the amounts received from customers by NOS Comunicações S.A. associated with mobile phone top-ups and the purchase of telecommunications minutes not yet consumed.

32. Operating revenues

Consolidated operating revenues for the years ended 31 December 2023 and 2024 break down as follows:

	4QR 23	12M 23	4Q 24	12M 24
Provision of services:				
Revenues from communications services i)	344,379	1,351,252	360,153	1,412,940
Revenues from cinema distribution and exhibition ii)	9,262	45,449	12,103	46,365
Advertising revenue iii)	7,521	21,734	8,501	25,540
Distribution of content and channels iv)	6,021	23,678	6,010	24,671
Others	3,090	9,874	6,255	20,188
	370,273	**1,451,987**	**393,022**	**1,529,704**
Sales:				
Telco v)	33,436	100,117	40,306	115,157
Audiovisuals and cinema exhibition vi)	3,408	16,160	4,597	16,724
	36,844	**116,277**	**44,903**	**131,881**
Other recipes:				
Telco	7,241	28,440	9,782	33,551
Audiovisuals and cinema exhibition	(15)	750	310	1,127
	7,226	**29,190**	**10,092**	**34,678**
	414,343	**1,597,454**	**448,017**	**1,696,263**

These operating revenues are net of eliminations between Group companies.

i. this item essentially includes revenues relating to: (a) subscription to basic channel packages that can be commercialised as a bundle with fixed broadband and/or fixed voice services; (b) subscription to premium channel packages and S-VOD; (c) rental of terminal equipment; (d) consumption of content (VOD); (e) mobile and fixed voice traffic and termination; (f) service activation; (g) mobile broadband Internet access; and (h) other additional services (e.g. firewall and antivirus) and provision of datacentre management and information systems consultancy services.

ii. this item essentially includes: (a) box office revenue at NOS cinemas and (b) revenue from the distribution of films to other cinema exhibitors in Portugal.

iii. this item includes advertising revenue from television channels and NOS cinemas.

iv. this item includes revenue related to the production of audiovisual content, through the compilation of acquired content, and the distribution of channels, essentially TVCines.

v. this heading essentially includes revenue from the sale of terminal equipment, telephones, and mobile phones.

vi. this item essentially includes the sale of NOS Cinemas bar products.

During the year ended 31 December 2024, consolidated revenues totalled Euro 1,696 million, up 6.2% year-on-year, with a strong contribution from the telco segment, and a positive performance in the audiovisual segment (cinema exhibition and audiovisuals business).

Telco segment

Throughout 2024, NOS recorded positive dynamics across all telco segments:

- in the consumption segment, comprising services provided to families and individuals, revenues rose by 4.6% year-on-year;
- in the corporate segment, revenues grew by 9.6%, with particular emphasis on the growth of the large corporate clients area;
- in the wholesale & other segment, revenues increased by 12.9%.

Audiovisual Segment

In the cinema exhibition and Audiovisual segment, revenues increased by 2.8%:

- in the cinema exhibition business, the number of tickets sold fell by 3.9%;
- in the Audiovisual segment, revenues grew by 8.8%, benefiting from the box office success of the films distributed by NOS Audiovisuais

Other Income includes income from contractual defaults and penalties, as well as other supplementary income of several kinds.

33. Payroll

In the financial years ended 31 December 2023 and 2024, this item was broken down as follows:

	4Q 23	12M 23	4Q 24	12M 24
Remuneration	14,946	67,064	17,001	67,020
Social charges	4,595	18,363	4,882	19,106
Other benefits	451	2,050	599	2,444
Others	1,399	2,729	1,709	3,597
	21,391	**90,206**	**24,191**	**92,167**

In the years ended 31 December 2023 and 2024, the average number of employees of the companies included in the consolidation was 2,454 and 2,440, respectively. As at 31 December 2024, the number of employees of the companies included in the consolidation was 2,464.

The costs of indemnities paid to employees, which fall within the definition of non-recurring costs of the company's operating activity, are recorded under Restructuring costs (Note 39).

34. Direct costs

In the years ended 31 December 2023 and 2024, this item was broken down as follows:

	4Q 23	12M 23	4Q 24	12M24
Content costs	46,706	185,923	47,160	186,940
Costs related to services to large corporate clients	19,218	58,347	24,374	79,930
Telecommunications costs - traffic	20,896	75,031	17,948	67,897
Telecoms costs - capacity	5,402	20,564	5,818	22,192
Advertising business - advertising spaces	5,187	14,526	5,429	16,486
	97,409	**354,391**	**100,729**	**373,445**

35. Cost of products sold

In the financial years ended 31 December 2023 and 2024, this item was broken down as follows:

	4Q 23	12M 23	4Q 24	12M24
Cost of products sold	32,036	96,640	39,224	110,533
Increases / (decreases) in impairment for inventories (Note 18)	6,271	7,771	2,866	989
	38,307	**104,411**	**42,090**	**111,522**

The increase in the cost of products sold kept pace with the increase in sales over the same period.

36. Support services and external supplies and services

In the years ended 31 December 2023 and 2024, these headings are broken down as follows:

	4Q 23	12M 23	4Q 24	12M24
Support services:				
Administrative and other support	10,395	38,861	11,089	42,865
Call centres and customer support	9,312	35,389	5,231	28,695
Information systems	4,345	17,384	4,331	16,361
	24,052	**91,634**	**20,651**	**87,921**
External supplies and services:				
Maintenance and repair	13,496	55,193	12,271	50,112
Electricity	5,403	17,382	9,974	32,426
Pipeline and pole hire	6,628	26,315	5,897	25,713
Specialised jobs	2,436	9,015	2,357	8,699
Installation, assembly, and equipment hire	1,701	5,785	1,821	6,619
Travel and subsistence	985	3,569	1,170	3,858
Communication	552	2,617	616	2,595
Other external supplies and services	9,338	33,653	12,906	38,132
	40,539	**153,529**	**47,012**	**168,154**

The variation in these items is essentially due to an increase in electricity costs (energy) and a reduction in call center and customer support costs and maintenance and repairs.

37. Provisions and adjustments

In the financial years ended 31 December 2023 and 2024, this item was broken down as follows:

	4Q 23	12M 23	4Q 24	12M24
Provisions (Note 26)	194	(1,161)	8,789	9,093
Expected credit losses - customers (Note 19)	1,513	11,941	9,516	18,231
Expected credit losses - other (Note 13)	-	94	175	571
Others	3	11	(80)	(80)
	1,710	**10,885**	**18,400**	**27,815**

38. Depreciation, amortisation and impairment losses

In the financial years ended 31 December 2023 and 2024, this item was broken down as follows:

	4Q 23	12M 23	4Q 24	12M24
Tangible fixed assets				
Buildings and other constructions	3,853	12,758	1,775	7,238
Basic equipment	50,474	187,989	35,989	155,504
Transport equipment	-	1	1	1
Tools and utensils	52	102	56	222
Administrative equipment	876	3,784	842	3,405
Other tangible fixed assets	108	534	140	499
	55,363	**205,168**	**38,803**	**166,869**
Intangible assets				
Industrial property and other rights	28,750	110,971	40,878	161,033
	28,750	**110,971**	**40,878**	**161,033**
Charges for contracts with clients				
Charges for contracts with clients	24,526	98,127	24,732	98,879
	24,526	**98,127**	**24,732**	**98,879**
Rights of use				
Rights of use	15,142	69,360	18,508	72,053
	15,142	**69,360**	**18,508**	**72,053**
Investment property				
Investment property	3	12	2	8
	3	**12**	**2**	**8**
	123,784	**483,638**	**122,923**	**498,842**

During the year ended 31 December 2024, NOS revised the depreciation rates of most of the software acquired and developed internally, reducing the useful life from 6 to 3 years, resulting in an increase in Depreciation, amortisation and impairment losses (Intangible assets) of Euro 44 million (Note 2.3.5)

39. Restructuring costs

In the years ended 31 December 2023 and 2024, restructuring costs are broken down as follows:

	4Q 23	12M 23	4Q 24	12M24
Compensation (Note 26 and 33)	2,366	3,590	1,019	2,684
Transformation and restructuring plan (Note 26)	-	-	8,617	8,617
Others	12	15	10	36
	2,378	**3,605**	**9,646**	**11,337**

During 2024, NOS began implementing a transformation and restructuring plan with the following objectives:

I. increase operational efficiency and reduce costs;

II. strengthen the company's competitive position in the market in which it operates;

III. adjusting the organisational structure to better support the new strategic goals.

To achieve these objectives, the main areas of activity will be:

I. review of Processes and Organisational Structure: Readjustment of functions and elimination of duplication to increase productivity;

II. optimisation of Human Resources: implementation of staff retraining and relocation programmes, with a support plan for affected employees.

In view of the above, NOS recognised a provision of Euro 8.6 million, which includes all expenses directly related to the transformation and restructuring process that began in 2024. The plan initiated in 2024 is expected to be finalised during the 2025 financial year.

40. Other non-recurring costs / (gains), net

The breakdown of this item for the years ended 31 December 2023 and 2024 is as follows:

	4Q 23	12M 23	4Q 24	12M24
Income				
Legal proceedings	38,529	38,529	47,399	89.,462
	38,529	**38,529**	**47,399**	**89,462**
Costs				
Others	3,994	4,594	(624)	2,633
	3,994	**4,594**	**(624)**	**2,633**
Total	**(34,535)**	**(33,935)**	**(48,023)**	**(86,829)**

In the year ended 31 December 2024, income of Euro 78.1 million (31 December 2023: Euro 38.5 million) was recognised as a result of favourable decisions in lawsuits brought by the company and the declaration of unconstitutionality with general binding force by the Constitutional Court relating to assessments of the Activity Fee (Note 46.1), an income of Euro 8.6 million resulting from the conclusion of the dispute over the undefined interconnection prices for 2001 (Note 47.6) and an income of Euro 2.7 million, resulting from a favourable decision in a case related to RDAO prices.

41. Losses / (Gains) in subsidiaries, net

In the financial years ended 31 December 2023 and 2024, this item was broken down as follows:

	4Q 23	12M 23	4Q 24	12M24
Equity equivalence (Note 12)				
Finstar	(566)	(2,945)	(601)	(6,122)
Mstar	(342)	(1,331)	(206)	(1,612)
Upstar	54	(580)	231	(211)
Dreamia	627	806	113	166
Others	(205)	(177)	(697)	(479)
	(432)	**(4,227)**	**(1,160)**	**(8,258)**
Other (Note 12)	**-**	**(854)**	**-**	**-**
	(432)	**(5,081)**	**(1,160)**	**(8,258)**

42. Financing costs/ (gains) and other financial costs / (income), net

In the years ended 31 December 2023 and 2024, financing costs and other net financial costs / (income) are broken down as follows:

	4Q 23	12M 23	4QR 24	12M24
Financing costs/ (gains):				
Interest paid:				
Borrowings	14,365	39,342	8,342	41,090
Leases	7,969	30,978	8,315	33,484
Derivatives	-	50	-	-
Others	(258)	2,492	565	6,137
	22,076	**72,862**	**17,222**	**80,711**
Interest earned:				
Arrears	(963)	(3,511)	(854)	(3,698)
Derivatives	(1,186)	(3,099)	(810)	(4,091)
Others	(224)	(959)	(2,330)	(2,905)
	(2,373)	**(7,569)**	**(3,994)**	**(10,694)**
Total	**19,703**	**65,293**	**13,228**	**70,017**
Other net financial costs / (income):				
Commissions on borrowings	755	3,015	675	2,766
Others	113	592	214	771
	868	**3,607**	**889**	**3,537**

43. Net profit/ (loss) per share

Earnings per share for the years ended 31 December 2023 and 2024 were calculated as follows:

	4Q 23	12M 23	4Q 24	12M24
Consolidated net profit/ (loss) from continuing operations attributable to shareholders	54,675	180,995	71,148	272,259
No. of ordinary shares outstanding during the year (weighted average)	511,424,977	511,392,858	508,778,308	508,822,765
Basic earnings per share - Euro	0.11	0.35	0.14	0.54
Diluted earnings per share - Euro	0.11	0.35	0.14	0.54

In the financial years presented there were no dilutive effects with an impact on the net profit/ (loss) per share, so this is equal to the basic earnings per share.

44. Guarantees and financial commitments assumed

44.1. Guarantees

At 31 December 2023 and 2024, the Group has guarantees in favour of third parties corresponding to the following situations:

	31-12-2023	31-12-2024
Tax administration i.	33,392	35,675
Others ii	15,763	16,806
	49,155	**52,481**

I. As at 31 December 2023 and 2024, this amount refers to guarantees demanded by the Tax Authorities as part of tax proceedings contested by the company and its subsidiaries (Note 46).

II. As at 31 December 2023 and 2024, this amount essentially refers to guarantees provided under the Municipal Rates of Rights of Way processes, guarantees provided to cinema rental companies and bank guarantees provided to companies that rent satellite capacity.

During the first quarter of 2015, 2016, 2017 and 2018, and following the assessment note for CLSU 2007-2009, 2010-2011, 2012-2013 and 2014, respectively, NOS set up guarantees in favour of the Universal Service Compensation Fund, in the amounts of Euro 23.6 million, Euro 16.7 million, Euro 17.5 million and Euro 3.0 million, respectively, in order to prevent the opening of tax enforcement proceedings with a view to the coercive payment of the amount assessed.

Furthermore, in addition to the guarantees required by the Tax Authorities, sureties were set up for ongoing tax proceedings in which NOS was a guarantor for NOS SA, totalling Euro 14.1 million.

44.2. Other commitments

Football broadcasting rights contracts

In December 2015, NOS signed a contract with Sport Lisboa e Benfica - Futebol SAD and Benfica TV, S.A. for the television broadcasting rights of home matches of the Benfica SAD senior football team for the NOS League, as well as the broadcasting and distribution rights of the Benfica TV Channel. The contract began in the 2016/2017 sporting season and has an initial duration of 3 years, which can be renewed by decision of either party up to a total of 10 sporting seasons, with the overall financial consideration totalling Euro 400 million, broken down into progressive annual amounts.

Also in December 2015, NOS signed a contract with Sporting Clube de Portugal - Futebol SAD and Sporting Comunicação e Plataformas, S.A. that includes the following rights:

1) TV and multimedia broadcasting rights for the home matches of Sporting SAD's senior football team;

2) the right to exploit static and virtual advertising at the José Alvalade stadium;

3) right to broadcast and distribute the Sporting TV Channel; and,

4) the right to be your Main Sponsor.

The contract will have a duration of 10 seasons for the rights mentioned in 1) and 2) above, starting in July 2018, 12 seasons for the rights mentioned in 3) starting in July 2017 and 12 and a half seasons for the rights mentioned in 4) starting in January 2016, with the overall financial consideration totalling Euro 446 million, broken down into progressive annual amounts.

Also in December 2015, NOS signed contracts for the television broadcasting rights of senior football home matches with the following sports companies:

1) Associação Académica de Coimbra - Organismo Autónomo de Futebol, SDUQ, Lda

2) Os Belenenses Sociedade Desportiva Futebol, SAD

3) Clube Desportivo Nacional Futebol, SAD

4) Futebol Clube de Arouca - Futebol, SDUQ, Lda

5) Futebol Clube de Paços de Ferreira, SDUQ, Lda

6) Marítimo da Madeira Futebol, SAD

7) Sporting Clube de Braga - Futebol, SAD

8) Vitória Futebol Clube, SAD

The contracts all start in the 2019/2020 season and last for up to 7 seasons, with the exception of the contract with Sporting Clube de Braga - Futebol, SAD, which lasts for 9 seasons.

In May 2016, NOS and Vodafone agreed to make available to each other, for several sports seasons, sports content (national and international) held by the companies, directly by the transferring party or indirectly through the transfer to channels or third-party content distribution models, with the aim of ensuring that both companies have the rights to broadcast the clubs' home games, as well as the rights to broadcast and distribute sports channels and

club channels, whose rights are held by each of the parties at any given time. The agreement took effect as of the 16/17 sports season, guaranteeing that NOS and Vodafone customers can access the Benfica channel and Benfica's home matches, regardless of the channel on which these matches are broadcast.

Considering the possibility of extending the agreement to other operators, in July 2016 MEO and Cabovisão signed up to it, putting an end to the lack of availability of the Porto Canal on the NOS grid and guaranteeing that all pay-TV customers in Portugal can have access to all relevant sports content, regardless of the telecoms operator they use.

As part of the agreement with the other operators, which is being made in some cases directly and in others through the transfer to third-party channels in return for the reciprocal provision of rights, the overall costs are shared out according to telecoms retail revenues and Pay TV market shares.

The estimated cash flows are summarised as follows:

Seasons	2024/25	Next seasons
Estimated cash flow from contracts signed by NOS with sports companies *	113.9	250.2
NOS' estimated cash flows, for contracts signed by NOS (net of amounts debited to operators) and for contracts signed by other operators	63.2	138.8

* Includes rights to broadcast matches and channels, advertising, and others.

Considering that, within the framework of the agreement signed with the other operators, the risks and benefits associated with the contracts with the clubs are shared between the operators, the agreement was considered a collaborative arrangement, which is why the revenue (with the operators) is offset against the expenses with the clubs.

Network sharing contract with Vodafone

NOS and Vodafone Portugal signed a nationwide infrastructure development and sharing agreement on 29 September 2017. This partnership allows the two operators to make their commercial offers available under the shared network from the beginning of 2018.

The agreement covers the reciprocal sharing of dark fibre in around 2.6 million homes, in which each of the entities shares an equivalent value of investment with the other, e.g. they share similar assets, assuming that the two companies maintain total autonomy, independence and confidentiality in the design of commercial offers and management of the customer database and in the choice of technological solutions that they decide to implement, with no impact on the Group's financial statements (in accordance with IAS 16, this exchange of similar non-monetary assets will be presented on a net basis).

The partnership has also been extended to the sharing of mobile infrastructure, where a minimum of 200 mobile towers has been agreed.

Agreements signed to share mobile network infrastructure

As at 22 October 2020, NOS Comunicações, S.A. and NOS Technology, S.A., on the one hand, and Vodafone Portugal, Comunicações Pessoais, S.A. on the other, signed a set of agreements with a view to sharing support mobile network infrastructure (passive infrastructure such as towers and masts) and active mobile network (active radio equipment such as antennas, amplifiers and other equipment).

The agreements have the following characteristics:

a) they are nationwide in scope, with differences in application depending on whether the areas are more or less densely populated: in the first areas, typically larger conurbations, the parties will exploit increased synergies in the sharing of support infrastructure and in the second areas, typically rural areas and in the interior of the country, the parties will, in addition to the common use of support infrastructure, share their active mobile network.

b) they concern assets currently owned or that will be owned by the parties in the future and the existing 2G, 3G and 4G technologies, and the accommodation of 5G in these agreements will depend on the autonomous decision of each operator to implement this technology or not.

c) spectrum sharing between operators, with the parties retaining exclusive strategic control of their networks, thus guaranteeing full competition, strategic and commercial freedom, and the ability to differentiate in the definition and provision of services to their respective customers.

Each party will be able to decide to develop its mobile communications network with total freedom and autonomy.

These agreements aim to make NOS' investments more efficient, to capture value by exploiting synergies and to develop the country's mobile network more quickly and in a more environmentally responsible way, providing greater benefits for its customers and other stakeholders.

Sharing mobile infrastructures is also an important contribution to increasing territorial cohesion and digital inclusion, essential factors for sustainable development throughout the country.

45. Notes to the Cash Flow Statement

The cash flow statement was drawn up in accordance with IAS 7.

45.1. Receipts from financial investments

The breakdown of receipts from financial investments is as follows:

	12M 23	12M 24
Disposal of NOS International Carrier Services	1,100	1,100
Repayment of loans granted to Bright City	-	242
Disposal Big Picture 2 Films	50	-
	1,150	**1,342**

45.2. Payments from financial investments

The breakdown of payments from financial investments is as follows:

	12M 23	12M 24
Tech Transfer Fund	216	190
Daredata	-	2,000
Seems Possible	400	-
Reckon.Ai	354	150
MindProber	-	350
BLU (Note 5)	254	-
BrigthCity (Note 5)	255	-
CEiiA (Note 5)	150	-
	1,629	**2,690**

45.3. Dividends/Profit distribution

Dividends are distributed as follows:

	12M 23	12M 24
NOS SGPS	219,987	178,958
	219,987	**178,958**

45.4. Borrowings

The borrowings heading shows the repayments and respective monthly renewals of commercial paper programme issues at net value.

46. Related parties

46.1. Balances and transactions between related entities

Transactions and balances between NOS and NOS Group companies were eliminated in the consolidation process and are not disclosed in this Note.

The balances as at 31 December 2023 and 2024 and the transactions in the years ended 31 December 2023 and 2024 between the NOS Group and associated companies, joint ventures and other related parties are as follows:

	Balances as at 31 December 2023		
	Accounts receivable and deferred costs	Accounts payable and deferred income	Loans granted
Associated companies	**13,550**	**7,289**	**-**
Sport TV	13,550	7,289	-
Jointly controlled companies	**14,833**	**1,813**	**3,298**
Dreamia, Serv. de Televisão, S.A.	1,453	1.428	-
Dreamia Servicios de Televisión, S.L.	105	-	3,173
Dualgrid – Gestão de redes partilhadas, S.A.	-	88	-
Finstar - Socied. Investim. Part. S.A.	13,280	(40)	-
Upstar Comunicações, S.A.	(17)	237	-
BrightCity, S.A.	11	100	125
Other related parties	**7,181**	**1,678**	**-**
Banco Bic Português, S.A.	204	-	-
Capwatt Services, S.A.	109	-	-
Colombo Shopping Centre, S.A.	153	27	-
Vasco da Gama Shopping Centre, S.A.	80	139	-
Gaiashopping I- Shopping Centre, S.A.	98	497	-
Modelo Continente Hipermercados, S.A.	1,104	49	-
Norteshopping Shopping Centre, S.A.	499	417	-
Universo IME, S.A.	398	-	-
SFS, Gestão e Consultoria, S.A.	5	265	-
Sierra Portugal, S.A.	435	(1)	-
Sonae Investment Management-S.T,SGPS,S.A.	121	-	-
MC Shared Services, S.A.	639	5	-
The Editory Collections Hotel, S.A.	143	-	-
Worten - Equipamento para o Lar, S.A.	1,971	192	-
Other related parties	1,221	87	-
	35,564	**10,780**	**3,298**

Transactions during the year ended 31 December 2023

	31-12-2023		
	Sales, services and other income	Purchases and services received	Interest earned
Associated companies	**52,016**	**66.715**	**-**
Big Picture 2 Films[1]	15	934	-
Sport TV[2]	52,001	65.781	-
Jointly controlled companies	**13,205**	**360**	**96**
Dreamia Servicios de Televisión, S.L.	-	-	94
Dreamia, Serv. de Televisão, S.A.	4,890	(162)	-
Finstar - Socied. Investim. Part. S.A.	8,275	-	-
Mstar, S.A.	-	11	-
Upstar Comunicações, S.A.	26	119	-
Dualgrid – Gestão de redes partilhadas, S.A.	1	287	-
BrightCity, S.A.	13	105	2
Other related parties	**27,973**	**10,359**	**-**
Adira - Metal Forming Solutions, S.A.	130	-	-
Arrábidashopping - Shopping Centre, S.A.	11	189	-
Banco Bic Português, S.A. [3]	1,866	-	
Capwatt Services, S.A.	249	-	-
Cascaishopping Shopping Centre, S.A.	12	1,035	-
Colombo Shopping Centre, S.A.	19	1,999	-
Vasco da Gama Shopping Centre, S.A.	13	1,107	-
Continente Hipermercados, S.A.	488	37	-
Estação Viana - Shopping Centre, S.A.	9	100	-
Fashion Division, S.A.	563	-	-
Gaiashopping I Shopping Centre, S.A.	10	716	-
Habit Analytics Group	-	135	-
Insco Insular de Hipermercados, S.A.	164	42	-
Irmãos Vila Nova III, S.A.	214	-	-
Maiashopping Shopping Centre, S.A.	9	194	-
Modalfa - Comércio e Serviços, S.A.	331	-	-
Modelo Continente Hipermercados, S.A.	5,577	240	-
Norteshopping Shopping Centre, S.A.	16	1,717	-
Parque Atlântico Shopping - C.C., S.A.	8	104	-
Pharmacontinente - Saúde e Higiene, S.A.	397	-	-
Público-Comunicação Social,S.A.	116	7	-
SC - Sociedade de Consultoria, S.A.	573	-	-
SDSR - Sports Division SR, S.A.	171	-	-
Universo IME, S.A.	817	-	-
SFS, Gestão e Consultoria, S.A.	21	336	-
Sierra Portugal, S.A.	1,686	83	-
Solinca Classic, S.A.	413	-	-
Sonae Arauco Portugal, S.A.	271	85	-
Sonae Investment Management-S.T.,SGPS,S.A.	179	-	-
MC Shared Services, S.A.	3,463	1	-
The Editory Collections Hotel, S.A.	242	-	-
Aqualuz Tróia, S.A.	112	-	-
Worten - Equipamento para o Lar, S.A.	8,032	1,869	-
Other related parties	1,791	363	-
	93,194	**77,434**	**96**

	Balances as at 31 December 2024		
	Accounts receivable and deferred costs	Accounts payable and deferred income	Loans granted
Associated companies	**24,156**	**10,487**	**-**
Sport TV	24,156	10,487	-
Jointly controlled companies	**14,700**	**2,481**	**3,399**
Dreamia, Serv. de Televisão, S.A.	1,594	136	-
Dreamia Servicios de Televisión, S.L.	166	-	3,267
Dualgrid - Gestão de redes partilhadas, S.A.	-	-	-
Finstar - Socied. Investim. Part. S.A.	12,941	2,030	-
Upstar Comunicações, S.A.	5	60	-
BrightCity, S.A.	(6)	255	132
Other related parties	**6,621**	**770**	**-**
Colombo Shopping Centre, S.A.	190	2	-
Gaiashopping I- Shopping Centre, S.A.	116	1	-
Maiashopping Shopping Centre, SA	1,476	(7)	-
Modelo Continente Hipermercados, S.A.	142	51	-
Norteshopping Shopping Centre, S.A.	157	-	-
Universo IME, S.A.	319	2	-
Sierra Portugal, S.A.	108	-	-
Solinca Classic, S.A.	642	123	-
MC Shared Services, S.A.	159	-	-
Worten - Equipamento para o Lar, S.A.	1,914	510	-
Other related parties	1,398	88	-
	45,477	**13,738**	**3,399**

Transactions during the year ended 31 December 2024

	31-12-2024		
	Sales, services and other income	Purchases and services received	Interest earned
Associated companies	**51,090**	**71,015**	**-**
Sport TV[2]	51,090	71,015	-
Jointly controlled companies	**14,045**	**199**	**170**
Dreamia Servicios de Televisión, S.L.	-	-	155
Dreamia, Serv. de Televisão, S.A.	4,310	(377)	-
Finstar - Socied. Investim. Part. S.A.	9,713	-	-
Upstar Comunicações, S.A.	29	115	-
Dualgrid - Gestão de redes partilhadas, S.A.	2	302	-
BrightCity, S.A.	(9)	158	15
Other related parties	**24,365**	**10,157**	**-**
Adira - Metal Forming Solutions, S.A.	154	-	-
Aqualuz Tróia-Expl.Hoteleira e Imob., S.A.	110	46	-
Arrábidashopping - Shopping Centre, S.A.	13	138	-
Banco Bic Português, S.A. [3]	923	-	-
Insco Insular de Hipermercados, S.A.	285	46	-
Capwatt Services, S.A.	272	-	-
Capwatt, S.A.	184	-	-
Cascaishopping Shopping Centre, S.A.	12	996	-
Colombo Shopping Centre, S.A.	45	2,338	-
Vasco da Gama Shopping Centre, S.A.	14	1,221	-
Continente Hipermercados, S.A.	452	32	-
E-FIT, Unipessoal, Lda.	103	-	-
Fashion Division, S.A.	203	-	-
Gaiashopping I Shopping Centre, S.A.	11	549	-
Habit Analytics Group	75	108	-
Maiashopping Shopping Centre, S.A.	9	222	-
Modelo Continente Hipermercados, S.A.	5,244	270	-
Modalfa - Comércio e Serviços, S.A.	184	-	-
Norteshopping Shopping Centre, S.A.	17	1,680	-
Parque Atlântico Shopping-C.Comerc., S.A.	9	149	-
Pharmacontinente - Saúde e Higiene, S.A.	387	-	-
Público - Comunicação Social, S.A.	101	14	-
Irmãos Vila Nova III, S.A.	165	-	-
Universo, IME, S.A.	604	-	-
SC Fitness, S.A.	134	-	-
SDSR - Sports Division SR, S.A.	193	-	-
SFS, Gestão e Consultoria, S.A.	6	311	-
Sierra Portugal, S.A.	1,680	61	-
Sohi Meat Solutions - Dist. de Carnes, S.A.	103	-	-
Solinca Classic, S.A.	500	-	-
Sonae Arauco Portugal, S.A.	218	123	-
MC Shared Services, S.A.	3,588	-	-
Sonae Investment Management-S.T.,SGPS, S.A.	151	-	-
The Editory Collections Hotel, S.A.	492	-	-
Via Catarina Shopping Centre, S.A.	10	122	-
Worten - Equipamento para o Lar, S.A.	5,979	1,446	-
Zippy - Comércio e Distribuição, S.A.	129	-	-
Other related parties	1,606	285	-
	89,500	**81,371**	**170**

(1) Company ceased to be a related party in June 2023.

(2) The amount relating to Sales and Services Rendered includes, in the year ended 31 December 2024, approximately Euro 49 million (31 December 2023: Euro 50 million), which is not recorded in the consolidated accounts under Sales and Services Rendered, as it is related to the agreement signed with the operators, which represents a sharing of costs and benefits, so that the revenue is offset against the costs with the clubs (Note 44.2).

(3) Company ceased to be a related party in July 2024.

The Company regularly enters into transactions and contracts with various entities within the NOS Group. These transactions were carried out under normal market terms for similar transactions and are part of the day-to-day business of the contracting companies.

As a result of the large number of related entities with low value balances and transactions, the amounts relating to balances and transactions with entities whose amounts are less than 100 thousand euros have been grouped under "Other related parties".

46.2. Remuneration of management members

In the years ended 31 December 2023 and 2024, the remuneration paid/attributed to the directors and other key members of NOS management (Managers) was as follows:

	12M23	12M24
Remuneration	3,614	3,515
Profit sharing / Bonuses	1,467	1,295
Share plans	1,467	1,295
Total	**6,548**	**6,105**

The average number of key management members in 2024 is 15 (15 in 2023).

The Corporate Governance Report includes more detailed information on NOS' remuneration policy. The Company considers the members of the Board of Directors to be Directors.

46.3. Fees and services provided by auditors

The information on the fees and services provided by the auditors is described in point 47 of the Corporate Governance Report.

47. Ongoing legal proceedings, contingent assets and contingent liabilities

47.1. Sectoral Regulatory Processes and the Competition Authority (PCA)

i. NOS SA, NOS Açores and NOS Madeira have been challenging in court ANACOM's acts of assessment of the Annual Activity Fee (corresponding to the years 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019 , 2020, 2021, 2022 and 2023) as an Electronic Communications Services Network Provider, requesting the refund of the amounts paid within the scope of the execution of these acts of assessment. For 2020, 2021, 2022 and 2023, NOS Wholesale also challenged the assessment of the Activity Fee in court. The amounts of the assessments are as follows, respectively: NOS SA: 2009: Euro 1,861 thousand, 2010: Euro 3.808 thousand, 2011: Euro 6,049 thousand, 2012: Euro 6,283 thousand, 2013: Euro 7,270 thousand, 2014: Euro 7,426 thousand, 2015: Euro 7,253 thousand, 2016: Euro 8,242 thousand, 2017: Euro 9,099 thousand, 2018: Euro 10,303 thousand, 2019: Euro 10.169 thousand, 2020: Euro 10,184 thousand, 2021: Euro 9,653 thousand, 2022: Euro 9.850 thousand and 2023: Euro 10,486 thousand. NOS Azores: 2009: Euro 29 thousand, 2010: Euro 60 thousand, 2011: Euro 95 thousand, 2012: Euro 95 thousand, 2013: Euro 104 thousand, 2014: Euro

107 thousand, 2015: Euro 98 thousand, 2016: Euro 105 thousand, 2017: Euro 104 thousand, 2018: Euro 111 thousand, 2019: Euro 107 thousand, 2020: Euro 120 thousand, 2021: Euro 123 thousand, 2022: Euro 123 thousand and 2023: Euro 120 thousand. NOS Madeira: 2009: Euro 40 thousand, 2010: Euro 83 thousand, 2011: Euro 130 thousand, 2012: Euro 132 thousand, 2013: Euro 149 thousand, 2014: Euro 165 thousand, 2015: Euro 161 thousand, 2016: Euro 177 thousand, 2017: Euro 187 thousand, 2018: Euro 205 thousand, 2019: Euro 195 thousand, 2020: Euro 202 thousand, 2021: Euro 223 thousand, 2022: Euro 235 thousand and 2023: Euro 247 thousand. NOS Wholesale: 2020: Euro 36 thousand, 2021: Euro 110 thousand, 2022: Euro 90 thousand and 2023: Euro 106 thousand. The levy corresponds to a percentage set annually by ANACOM (in 2009 it was 0.5826%) on operators' electronic communications revenues. In the objections, they invoke i) vices of unconstitutionality and illegality related to the fee itself and to the inclusion, in the accounting of ANACOM's costs, of the provisions set up by the regulator with legal proceedings brought against it (including these same objections to the activity fee) and ii) that only revenues relating to the electronic communications activity itself can be taken into account for the purposes of applying the percentage and calculating the fee to be paid, and that revenues from television content should not be taken into account. Judgements have been handed down in more than three dozen cases on the matter, which ANACOM has appealed to the Central Administrative Court, the Supreme Administrative Court and/or the Constitutional Court. Between 2023 and the first quarter of 2024, the Constitutional Court ruled, in several dozen separate cases that have since become final, that Ordinance 1473-B/2008 of 17 December, which regulates the determination of fees due for the exercise of the activity of provider of electronic communications networks and services, is unconstitutional, and also ordered ANACOM to refund the amount unduly charged. The other cases are awaiting judgement and/or decision, with some cases in which ANACOM raises the issue of the NOS' right to interest. By ruling of 29 October 2024, the Constitutional Court declared the unconstitutionality, with general binding force, of the rules of the aforementioned Ordinance no. 1473-B/2008, of 17 December, as amended by Ordinance no. 296-A/2013, of 2 October, insofar as they determine the incidence and the rate to be applied in relation to providers of electronic communications networks and services included in tier 2, for violation of the constitutional reserve of formal law. During the years ended 31 December 2023 and 2024, NOS recognised income of 38.5 million euros and 78.1 million euros (Note 40), respectively, corresponding to the amount relating to the pending impugnation processes whose assessments were issued under the rules deemed unconstitutional.

ii. During the first quarter of 2017, NOS was notified by ANACOM of the initiation of administrative offence proceedings related to price update communications made at the end of 2016 and beginning of 2017. At the end of the last quarter of 2020, ANACOM notified NOS of the accusation, charging it with 4 very serious administrative offences and 1 serious administrative offence relating respectively to (i) the failure to inform customers of the right to terminate their contract free of charge as a result of price changes, with (ii and iii) the alleged failure to adequately communicate the price update and (iv) the adequate advance notice, and also with (v) failure to provide information requested by ANACOM, and ANACOM did not at that time specify any amount of fine, except for the serious administrative offence. In the case of the latter, ANACOM gave NOS the possibility of settling the fine at the minimum, in the amount of 13 thousand euros, which NOS did. NOS submitted a Written Defence on 29 January 2021 and, in November 2022, was notified of ANACOM's decision ordering it to pay a fine of 5.2 million euros. NOS challenged the

decision in court and, in September 2023, the court reduced the amount of the fine imposed on NOS to 4.2 million euros. NOS appealed this decision to the Court of Appeal, which reduced the fine to 3.5 million euros. In May 2024, NOS appealed this judgement to the Constitutional Court, pending further developments in the case.

iii. On 17 July 2020, NOS was notified by the AdC of an infringement notice (indictment) relating to digital marketing on the google search engine, accusing the operators MEO, NOS, NOWO and Vodafone of concertation, for the period between 2010 and 2018, but without identifying a specific fine. It is not possible at this time to estimate the amount of any fine. NOS challenged the nullity of the taking of evidence, which in July 2022, the Lisbon Court of Appeal confirmed, a decision that has become final. NOS then asked the AdC to delete the seized emails, which the AdC refused on the grounds of an appeal. In July 2023, the Supreme Court of Justice rejected the appeal lodged by the AdC and, in the same month, the NOS informed the Competition, Regulation and Supervision Court of this decision. The NOS opposed the conclusion of supervening uselessness of the dispute, but the Court came to the same conclusion and the NOS appealed the decision. In January 2024, NOS was notified by the PCA that the emails affected by the declaration of prohibition of evidence had already been expunged from the case file and, in February 2024, NOS asked for other documentary elements to be expunged from the case file, and, to date, no decision has yet been handed down on this matter. It is the Board of Directors' conviction, given the elements it is aware of, that it will be able to demonstrate the various arguments in favour of its defence. On 15 December 2021, NOS was notified by the AdC of a notice of unlawfulness (accusation) concerning practices related to the advertising service in automatic recordings, in which it accuses NOS, other operators and a consultant of concerted behaviour in the advertising market in television recordings. NOS submitted its written defence and subsequently challenged the nullity of the taking of evidence. By decision of August 2023, a set of evidence that had been seized was eliminated, which led to the declaration of the supervening uselessness of the dispute as regards the request for the cancellation of emails submitted by the NOS. In January 2024, NOS was notified by the PCA that the emails affected by the declaration of prohibition of evidence had already been expunged from the case file. In September 2024, the PCA notified the NOS of the final decision on the elements that make up the case, a decision that resumes the investigation phase of the case and includes a request to the NOS for new elements. In December 2024, the AdC notified the NOS of a new note of illegality (indictment) in which it repeats the previous indictment. The deadline for the NOS to submit a written defence is underway. It is the Board of Directors' conviction, given the elements it is aware of, that it will be able to demonstrate the various arguments in favour of its defence.

47.2. Tax administration

During 2003 to 2024, some companies in the NOS Group were subject to tax inspections for the financial years 2001 to 2021. Following the successive inspections, NOS SGPS, as the parent company of the Tax Group, as well as the companies that were not part of the Tax Group, were notified of the corrections made by the Tax Inspection Services in terms of Corporate Income Tax, VAT and Stamp Duty and of the corresponding additional payments. The total value of the outstanding notices, plus interest and charges, amounts to 39 million euros. These notices have been contested and the respective legal proceedings are underway.

Based on the opinions obtained from the attorneys in the cases and from tax consultants, the Board of Directors remains convinced of a favourable outcome, which is why it is keeping these cases in court. Nevertheless, in accordance with the principle of prudence, the Group's level of exposure to these lawsuits is periodically assessed in the light of developments in case law, and the provisions set up for this purpose are adjusted accordingly. The Group has provided bank guarantees required by the Tax Authorities as part of these processes, as mentioned in Note 44.

47.3. Actions by MEO against NOS SA, NOS Madeira and NOS Açores and by NOS SA against MEO

In 2011, MEO brought a claim for 10.3 million euros against NOS SA in the Lisbon Judicial Court, as compensation for alleged undue portability by NOS SA between March 2009 and July 2011. NOS SA contested the claim and the court initially ordered an expert's report, which has since been cancelled. The hearing for discussion and judgement took place in the first half of 2016, and in September of the same year a judgement was handed down, partially upholding the action, on the grounds that it was not possible to prove the existence of undue portability, which the Court ruled should be restricted to those that did not correspond to the holder's wishes. To this end, it ordered NOS to pay MEO approximately 5.3 million euros, a decision which NOS appealed to the Lisbon Court of Appeal. MEO, for its part, complied with the judgement and did not appeal against the part of the judgement that acquitted NOS. The Lisbon Court of Appeal, in the 1st quarter of 2018, confirmed the decision handed down by the Court of First Instance, except with regard to interest, in which it upheld NOS's claim that interest should be calculated from the date of service of the lawsuit and not from the due date of the invoices. NOS filed an exceptional appeal with the Supreme Court of Justice (STJ), which found the facts proved to be insufficient to resolve the issue on the merits. As a result, the STJ ordered the court under appeal to expand on the facts. The case was referred back to the Court of First Instance and, in November 2019, the Court granted the parties the possibility of requesting the production of additional evidence on the matter of the amplification, with NOS requesting an expert's report and the repetition of witness evidence. As early as February 2020, the Court determined the need to obtain new evidence, which required analysing the information contained in all the portabilities on which the case was based, and ordered expert evidence to be carried out for this purpose. The expert was appointed in October 2021. In December 2022, the expert asked to be relieved of his duties on the grounds that qualified non-judicial verification was unfeasible in view of the volume of documentation to be analysed, and in April 2023 the court ruled that, in view of the expert's request, the trial should be limited to the presentation of written arguments. The parties submitted their written arguments in June and NOS, in addition, filed an autonomous appeal against this order, believing that the court's decision violated the STJ judgement. In July 2023, despite the fact that no additional evidence had been produced as determined by the STJ, the Court issued a new decision ordering NOS to pay 5.3 million euros. In October 2023, NOS appealed against this decision to the Lisbon Court of Appeal and, in April 2024, this Court revoked the 1st instance Court's order and ordered the examination of witnesses to the matter of fact added following the Judgement handed down by the Supreme Court of Justice in March 2019.

In 2011, NOS SA brought a claim against MEO in the Lisbon Judicial Court for compensation for damages suffered by NOS SA as a result of MEO's violation of the Portability Regulation, specifically the large number of unjustified refusals of portability requests by MEO between February 2008 and February 2011. The court ordered technical and economic-financial expert evidence, and the expert reports were finalised in February 2016 and June 2018, respectively. MEO argued that the economic and financial expert report was invalid, which was rejected. After the trial, in May 2022, the court ruled partially in favour of NOS, condemning MEO to pay 7.9 million euros, a decision challenged by MEO and NOS through appeals in October 2022. At the end of March 2023, the Lisbon Court of Appeal overturned the initial decision and ordered that the facts of the case be expanded, which will require new trial sessions. This decision also

recognised that the other issues raised by both NOS and MEO should not be examined as they were considered to be prejudiced. Following the judgement of the Lisbon Court of Appeal, MEO appealed to the Supreme Court of Justice regarding the request to waive (or reduce) the remaining court fee. The Supreme Court confirmed the judgement of the Lisbon Court of Appeal, which had rejected MEO's request, taking into account its conduct. Recently, the Court notified the Parties that, due to the impediment of the Judge in charge of the case, it is expected that the trial hearing will not take place in the first quarter of 2025. It is the opinion of the Board of Directors, corroborated by the lawyers accompanying the case, that in formal and substantive terms there is a good chance that NOS SA will be able to win the case, not least because MEO has already been condemned for the same offences by ANACOM

47.4. Action brought by DECO

In March 2018, NOS was notified of a legal action brought by DECO against NOS, MEO and NOWO, seeking a declaration that the obligation to pay the price increases imposed on customers at the end of 2016 was null and void. In April and May 2018, the operators, including NOS, filed a defence. The claim was set at €60,000. After the discussion and trial sessions were held in 2022, NOS filed an appeal against the court decision that dispensed with the production of testimonial evidence, which was upheld by the Lisbon Court of Appeal. Trial sessions were held in June and September 2024, followed by the final arguments phase. The case has since been adjourned at the request of the parties. The Board of Directors is convinced that the arguments used by the plaintiff are unfounded, which is why it is believed that the outcome of the case should not have a significant impact on the Group's financial statements

47.5. Lawsuit brought by Citizens Voice

In November 2022, NOS was served with a lawsuit filed by Citizens Voice - Consumer Advocacy Association ("Citizens Voice"), which makes a number of claims related to the automatic activation of pre-defined volumes of mobile data once the volume of data included in the monthly fee contracted by customers has been used up. Citizens Voice is specifically asking for (i) a judicial declaration of the illegality of this practice, as it believes that it violates a set of national and European rules, (ii) recognition of the right of customers to refuse to contract these services, (iii) the return of sums paid in this regard over the last few years by NOS customers, as well as (iv) the payment of compensation in the amount of 100 euros to each customer for alleged moral damage resulting from this practice. In December 2022, NOS filed its defence, invoking Citizens Voice's illegitimacy in bringing the action, namely due to the existence of a profit interest, and furthermore defending the lawfulness of the practice and its transparency and clarity for its customers. The Court has notified the parties that it will rule on the NOS's allegations regarding illegitimacy, pointing out that the case may end if the issues raised by the NOS are upheld. The Board of Directors is convinced that the arguments used by the plaintiff are not well-founded, which is why it believes that the outcome of the case should not have a significant impact on the Group's financial statements.

47.6. Interconnection tariffs

As at 30 June 2024, there were outstanding balances with national operators, recorded under customers and suppliers, in the amount of 37,139,253 euros and 43,475,093 euros, respectively, resulting from a dispute between NOS SA and, essentially, MEO - Serviços de Comunicações e Multimédia, S.A. (formerly TMN-Telecomunicações Móveis Nacionais, S.A.), relating to the undefined interconnection prices for 2001. In the part of this dispute with MEO that was before the courts, the outcome was entirely favourable to NOS SA and has become final. In March 2021, MEO filed a new lawsuit against NOS, claiming that the price of interconnection services between TMN and Optimus for 2001 should be set at 55$00 (€0.2743) per minute. After NOS filed a defence challenging MEO's claim, NOS was acquitted by court decision. MEO appealed

this decision to the Court of Appeal, the Supreme Court of Justice and, later, the Constitutional Court. In May 2024, in a complaint to the conference, the latter was rejected and the decision not to admit MEO's appeal was confirmed. As the case was concluded, in the year ended 31 December 2024, NOS derecognised these outstanding balances, giving rise to a gain recognised under Other non-recurring costs / (gains), net (Note 40).

48. Share Assignment Plan

The General Meeting of 23 April 2014 approved the Regulation on Short- and Medium-Term Variable Remuneration, which establishes the terms of the Share Assignment Plan ("NOS Plan"). This plan is aimed at employees above a certain job level, and the rights are exercised three years after they are assigned, provided that the employee remains with the company during this period.

As at 31 December 2024, the outstanding plans are as follows:

	Number of shares
NOS Plan	
2022 Plan	1,242,619
2023 Plan	1,112,875
2024 Plan	1,257,476

During the year ended 31 December 2024, the changes under the Plans are detailed as follows:

	2021 Plan NOS	2022 Plan NOS	2023 Plan NOS	2024 Plan NOS	Total
Balance as at 31 December 2023	**1,426,069**	**1,164,196**	**1,038,600**	**-**	**3,628,865**
Changes in the year:					
Allocated	-	-	-	1,167,302	1,167,302
In Office	(1,059,516)	(7,976)	(3,536)	(1,175)	(1,072,203)
Cancelled/Terminated/Corrected (1)	(366,553)	86,399	77,811	91,349	(110,994)
Balance as at 31 December 2024	**-**	**1,242,619**	**1,112,875**	**1,257,476**	**3,612,970**

(1) Includes, predominantly, corrections made to the dividend paid, shares relating to exceptionally cash-settled plans and shares relating to employees leaving without the right to receive shares.

The costs of share plans are recognised over the period between the grant and the exercise of the shares. The liability for the plans is calculated based on the share price on the grant date of each plan, for plans settled in shares, or on the closing date, for plans settled in cash, and the liability is recognised in Reserves and Accrued expenses, respectively.

As at 31 December 2024, the outstanding liability relating to these plans is Euro 7,304 thousand and is fully recorded in Reserves.

For the years ended 31 December 2023 and 2024, the costs recognised and the respective liability are as follows:

	12M 23	12M 24
Costs recognised in previous years for outstanding plans at 31 December	6,675	7,099
Costs of plans exercised in the period (in office)	(4,670)	(3,277)
Costs of cash-settled plans	-	(1,180)
Costs recognised in the period and others	5,094	4,662
Total plan costs at 31 December	**7,099**	**7,304**

49. Other matters

49.1. Preventive seizure of 26.075% of the share capital of NOS, SGPS, S.A.

On 4 April 2020, SONAECOM, SGPS, S.A. ("Sonaecom"), owner of 50% of the share capital of ZOPT, SGPS, S.A. (hereinafter "ZOPT"), was informed by its subsidiary of the communication received from the *Tribunal Central de Instrução Criminal de Lisboa* (hereinafter the Court) to proceed with the preventive seizure of 26.075% of the share capital of NOS, SGPS, SA, corresponding to half of the shareholding in NOS held by ZOPT and, indirectly, by the companies Unitel International Holdings, BV and Kento Holding Limited", controlled by Isabel dos Santos. According to this decision, the seized shares are deprived of the right to vote and the right to receive dividends, the latter of which must be deposited with Caixa Geral de Depósitos, S.A. to the order of the Court. The other half of ZOPT's stake in NOS' share capital, corresponding to the same percentage of 26.075% - which, at least in line with the criteria used by the Court, embodies the 50% held in ZOPT by SONAECOM - was not seized, nor were the rights inherent to it subject to any limitations.

On 12 June 2020, ZOPT was authorised by the *Tribunal Central de Instrução Criminal de Lisboa* to exercise the voting rights corresponding to the 26.075% of NOS' share capital preventively seized by order of the said Court.

Following the communication of 4 April 2020, ZOPT filed a third-party motion to stay the proceedings, which the investigating judge rejected in June 2020 on the grounds that the Portuguese courts had no jurisdiction to hear and decide them, a decision which, having been appealed by ZOPT, was revoked by the *Tribunal da Relação de Lisboa* (TRL) in February 2021.

In November 2021, the investigating judge, hearing the merits of the case, dismissed the third-party objections filed by ZOPT, a decision which, according to ZOPT, was appealed to the *Tribunal da Relação*. After being admitted in February 2022, in June 2022, ZOPT was notified of the decision to dismiss the appeal.

In September 2022, Sonaecom informed that at the General Meeting of ZOPT it was decided to amortise Sonaecom's shareholding in that company and to return the ancillary payments made by Sonaecom, for a consideration that includes the delivery of shares representing 26.075% of the share capital of NOS. As a result of this amortisation, which was subject to the applicable legal procedures, Sonaecom ceased to be a shareholder in ZOPT, which is now wholly owned by Unitel International Holdings, BV and Kento Holding Limited, companies controlled by Isabel do Santos. In December 2022, Sonaecom, following the fulfilment of the legal procedures, informed that it now directly holds 134,322,269 ordinary shares in NOS, corresponding to 26.07% of the share capital.

It also informed that this holding is also attributable to the entities that are in a control relationship with it, namely SONTEL, BV, Sonae Investments, BV, SONAE, SGPS, S.A. and EFANOR INVESTIMENTOS, SGPS, S.A.

The Board of Directors of NOS is not aware of any possible developments in the preventive seizure process referred to above.

To date, Sonaecom holds 192,527,188 ordinary shares corresponding to 37.37% of NOS' share capital.

50. Subsequent events

On 27 January 2025, NOS and the Claranet Group signed an agreement for the acquisition by NOS Information Technologies, SGPS, S.A. (incorporated in January 2025) of 100% of the share capital of Claranet Portugal, for the amount of Euro 152 million. This operation reinforces NOS's strategic objective of leadership in ICT services in Portugal, consolidating its position as a technological partner of reference for national companies and institutions.

This acquisition accelerates the company's growth in the information technology segments, bringing together Claranet's competences, experience, and assets to provide innovative solutions that drive the digital transformation of the Portuguese economy and society.

Claranet Portugal, present in the market since 2005, recorded total revenues of Euro 205 million and an EBITDA of Euro 15.4 million in the financial year ended 30 June 2024. The company has more than 900 employees and will continue to operate autonomously, preserving its identity, management, teams, and solid customer base.

Completion of the transaction is subject to non-opposition by the Competition Authority. As of the date of signing this Annual Report, no position has been disclosed by the Competition Authority in relation to this operation. Up to the date of approval of this document, there have been no other relevant subsequent events that should be disclosed in this report.

51. Maps attached

a. Companies included in the full consolidation method

Name	Head Office	Main activity	Holder of capital	Percentage of capital held		
				Effective 31-12-2023	Direct 31-12-2024	Effective 31-12-2024
NOS, SGPS, S.A. (Parent company)	Lisbon	Management of shareholdings	-	-	-	-
N5G Venture Capital Fund (a)	Lisbon	Investing in and supporting the development of companies aimed at commercialising technologies and products resulting from scientific and technological research	NOS	100%	100%	100%
Empracine - Empresa Promotora de Atividades Cinematográficas, Lda.	Lisbon	Film screening	Lusomundo SII	100%	100%	100%
Lusomundo - Sociedade de investimentos imobiliários SGPS, SA	Lisbon	Operation of real estate assets	NOS	100%	100%	100%
Lusomundo Imobiliária 2, S.A.	Lisbon	Operation of real estate assets	Lusomundo SII	100%	100%	100%
Lusomundo Moçambique, Lda. (b)	Maputo	Cinema exhibition, organisation and operation of public shows	NOS + NOS Cinemas	100%	100%	100%
NOS Sistemas, S.A.	Lisbon	Provision of consultancy services in the area of information systems	NOS Comunicações	100%	100%	100%
NOS Sistemas España, S.L.	Madrid	Provision of consultancy services in the area of information systems	NOS Comunicações	100%	100%	100%
NOS Açores Comunicações, S.A.	Ponta Delgada	Distribution of cable and satellite television signals, operation and provision of telecommunications services in the Autonomous Region of the Azores	NOS Comunicações	84%	84%	84%
NOS Audiovisuais, SGPS, S.A.	Lisbon	Management of shareholdings in other companies, as an indirect way of carrying out economic activities	NOS	100%	100%	100%
NOS Property, S.A.	Lisbon	Ownership, management, and exploitation of intellectual property	NOS	100%	100%	100%
NOS Comunicações, S.A.	Lisbon	Implementation, operation, exploitation and supply of networks and provision of electronic communications services and related services, as well as the supply and marketing of electronic communications products and equipment; distribution of television and radio programme services	NOS	100%	100%	100%
NOS Corporate Centre, S.A.	Lisbon	Provision of business support services and management and administration consultancy, including accounting, logistical, administrative, financial, tax, human resources and any other services that are subsequent or related to the above activities.	NOS	100%	100%	100%
NOS Inovação, S.A.	Matosinhos	Carrying out and boosting scientific and research and development activities, as well as demonstration, dissemination, technology transfer and training, in the fields of information services and systems and state-of-the-art fixed and mobile television, internet, voice and data solutions, licensing and the provision of engineering and consultancy services.	NOS Comunicações	100%	100%	100%
NOS Internacional, SGPS, S.A.	Lisbon	Management of shareholdings in other companies, as an indirect way of carrying out economic activities	NOS	100%	100%	100%
NOS Lusomundo Audiovisuais, S.A.	Lisbon	Import, distribution, exploitation, commercialisation and production of audiovisual products	NOS Audiovisuais SGPS	100%	100%	100%
NOS Lusomundo Cinemas , S.A.	Lisbon	Cinema exhibition, organisation and operation of public shows	NOS Audiovisuais SGPS	100%	100%	100%
NOS Audio - Sales and Distribution, S.A.	Lisbon	Distribution of cinematographic films, editing, distribution and sale of audiovisual products	NOS Audiovisuais SGPS	100%	100%	100%
NOS Madeira Comunicações, S.A.	Funchal	Distribution of cable and satellite television signals, operation and provision of telecommunications services in the Autonomous Region of Madeira	NOS Comunicações	78%	78%	78%
NOS Mediação de Seguros, S.A.	Lisbon	Insurance distribution and related activities	NOS	100%	100%	100%
NOS TECHNOLOGY - Concepção, Construção e Gestão de Redes de Comunicações, S.A. ('Artis')	Matosinhos	Design, construction, management and operation of electronic communications networks and the respective equipment and infrastructures, management of own or third party technological assets and provision of related services	NOS Comunicações	100%	100%	100%
NOS Wholesale, S.A.	Lisbon	Trade, provision and operation of wholesale electronic communications services, national and international, and related services, namely information and communication technology services	NOS Comunicações	100%	100%	100%
Per-Mar - Sociedade de Construções, S.A. ('Per-Mar')	Lisbon	Buying and selling, renting and operating property and commercial establishments	NOS Comunicações	100%	100%	100%
Sontária - Empreendimentos Imobiliários, S.A. ('Sontária')	Lisbon	Development and construction of buildings, planning, urban management, studies, construction and property management, purchase and sale of property and resale of property acquired for this purpose	NOS Comunicações	100%	100%	100%
Teliz Holding, S.A.	Lisbon	Management of shareholdings	NOS Internacional, SGPS, S.A.	100%	100%	100%
Ten Twenty One, S.A (c)	Lisbon	Provision of engineering and consultancy services in the area of information, communication and electronic technologies	NOS	100%	100%	100%

(a) NOS SGPS: 27.50%; NOS Sistemas: 20.00%; NOS Internacional SGPS: 20.00%; NOS Audiovisuais SGPS: 22.50%; NOS Cinemas: 10.00%
(b) NOS SGPS: 90%; NOS Lusomundo Cinemas: 10%
(c) Incorporated in February 2023

b. Associated companies

Name	Head Office	Main activity	Capital holder	Percentage of capital held		
				Effective 31-12-2023	Direct 31-12-2024	Effective 31-12-2024
Big Picture 2 Films, S.A. (a)	Oeiras	Import, distribution, exploitation, trade, and production of cinematographic films, videograms, phonograms and other audiovisual products	NOS Audiovisuais	-	-	-
Big Picture Films, S.L. (a)	Madrid	Film distribution and sales	Big Picture 2 Films, S.A.	-	-	-
Sport TV Portugal, S.A.	Lisbon	Conception, production, realisation and marketing of sports programmes for television broadcasting, acquisition and resale of television broadcasting rights for sports programmes, and exploitation of advertising	NOS	25%	25%	25%
DAREDATA (b)	Lisbon	Provision of consultancy services, development, monitoring, maintenance, and training of systems in the area of information technology, computer applications, internet and electronics and complementary products or services. Auditing, consultancy, and training in the areas of technology and business management and associated areas and complementary products or services, representation of brands and organisation of events, management and promotion of real estate assets and income from own property and on behalf of others.	NOS 5G Fund	0,00%	20,00%	20,00%

(a) The company was sold in Jun-23

(b) Acquisition by the NOS 5G Fund of 20% of the share capital of DareData for Euro 2 million. This investment is recognised at fair value.

c. Jointly controlled companies

Name	Head Office	Main activity	Capital holder	Percentage of capital held		
				Effective 31-12-2023	Direct 31-12-2024	Effective 31-12-2024
Dreamia Servicios de Televisión, S.L.	Madrid	Management of shareholdings	NOS Audiovisuais	50.00%	50.00%	50.00%
Dreamia - Serviços de Televisão, S.A.	Lisbon	Conception, production, realisation and commercialisation of audiovisual content, exploitation of advertising, provision of accessory services	Dreamia Holding BV	50.00%	100.00%	50.00%
FINSTAR - Sociedade de Investimentos e Participações, S.A.	Luanda	Distribution of satellite television signals, operation, and provision of telecommunications services	Teliz Holding B.V.	30.00%	30.00%	30.00%
Upstar Comunicações S.A.	New Sales	Electronic communications services, production, commercialisation, transmission and distribution of audiovisual content and consultancy.	NOS Internacional, SGPS, S.A.	30.00%	30.00%	30.00%
ZAP Media S.A.	Luanda	Development of projects and activities in the areas of entertainment, telecommunications and related technologies, the production and distribution of the respective contents and the design, execution and operation of related infrastructures and installations.	FINSTAR	30.00%	100.00%	30.00%
MSTAR, SA	Maputo	Distribution of satellite television signals, operation, and provision of telecommunications services	NOS Internacional, SGPS, S.A.	30.00%	30.00%	30.00%
Dualgrid - Gestão de Redes Partilhas, S.A.	Lisbon	Provision of technical, administrative, and financial consultancy services to telecommunications companies, planning and management of telecommunications networks and any other activities that are complementary, subsidiary or accessory to those referred to in the previous paragraphs.	NOS Comunicações	50.00%	50.00%	50.00%
BrightCity S.A.	Maia	Creation and development of technologies to improve electrical, lighting, communications, information systems management or other infrastructures; trade and provision of services for the better management of available resources with an environmental, economic and social impact, including, but not limited to, the supply, installation and maintenance of electrical equipment and electricity distribution networks, the assembly, installation and maintenance of lighting and signalling systems and equipment, the optimised management of parking spaces and road traffic, the management of water consumption, the supply, installation and management of communications networks, data processing, technical support, maintenance and other information technology services, as well as any other ancillary or complementary activities.	NOS Comunicações	50.00%	50.00%	50.00%

Financial investments in which the shareholding is less than 50% have been considered joint ventures due to shareholders' agreements that give them shared control.

d. Companies in which NOS does not have significant influence

Name	Head Office	Main activity	Capital holder	Percentage of capital held		
				Effective 31-12-2023	Direct 31-12-2024	Effective 31-12-2024
Digital Transformation Collaborative Laboratory Association - DTX	Guimarães	Applied research in the different areas associated with digital transformation to encourage cooperation between R&D units, educational institutions and the productive sector	NOS Inovação	4.92%	4.92%	4.92%
CEiiA (a)	OPorto	It designs and develops technology and produces new products and services for a more sustainable society.	NOS	16.20%	16.20%	16.20%
Didimo Inc. (b)	Dover	DIDIMO has developed a platform that makes it possible to generate 3D digital avatars based on photographs in around 60 seconds.	NOS 5G Fund	0.00%	0.00%	0.00%
Didimo SA (b)	OPorto	DIDIMO has developed a platform that makes it possible to generate 3D digital avatars based on photographs in around 60 seconds.	NOS 5G Fund	0.00%	0.00%	0.00%
TechTransfer Fund	Lisbon	Investing in and supporting the development of companies aimed at commercialising technologies and products resulting from scientific and technological research	NOS Inovação	3.90%	3.90%	3.90%
Lusitânia Vida - Companhia de Seguros, S.A ("Lusitânia Vida")	Lisbon	Insurance business	NOS	0.03%	0.03%	0.03%
Lusitânia - Companhia de Seguros, S.A ("Lusitânia Seguros")	Lisbon	Insurance business	NOS	0.02%	0.02%	0.02%
Mindprober	Braga	The company aims to measure the emotional impact that multimedia content has on consumers through wearables that monitor biometric data such as sweat or heart rate.	NOS 5G Fund	2.09%	2.09%	2.09%
RK. AI - Serviços de Processamento de Imagens e Análise de Dados, S.A. (Reckon.ai)	OPorto	Activities related to information technology and computing, image and data processing and analysis, information domiciliation and related activities and IT consultancy.	NOS 5G Fund	11.76%	11.76%	11.76%
Seems Possible, Lda. (Knock Healthcare) (c)	OPorto	Data processing activities, information domiciliation and related activities, particularly in the health area.	NOS 5G Fund	0.00%	0.00%	0.00%
SkillAugment, Lda (KIT-AR) (c)	Aveiro	Conception, design, development of methodologies, programming, editing, testing, assistance and maintenance of computer programmes, online web platforms and virtual and augmented reality systems, with machine learning and artificial intelligence capabilities, in industrial and business environments.	NOS 5G Fund + TechTransfer Fund	0.00%	0.00%	0.00%
Colab4Ageing (d)	Coimbra	Promoting and carrying out innovation and advanced training initiatives and activities geared towards the area of ageing, fostering new forms of collaboration between the public and private sectors that can create value and skilled jobs, as well as pursuing research and development activities with a view to innovation and the transfer of knowledge and technologies to accelerate the transformation of the Portuguese health system in the area of ageing.	NOS Comunicações	0.00%	11.97%	11.97%

(a) NOS SGPS subscribed to 150 units of CEiiA - Centro de Engenharia e Desenvolvimento, giving it a 16.2% stake.

(b) The NOS 5G Fund only holds 1 share in each of the entities, representing 0.0% of the capital.
(c) The investment in the entity was in convertible debt, so the holding was 0%.
(d) NOS Comunicações subscribed to 42.5 Shares in the Colab4Ageing Association for a unit value of €100, totalling a payment of Euro 4,250 and giving it a 12% stake.

These financial statements are a translation of financial statements originally issued in Portuguese in accordance with International Financial Reporting Standards (IAS / IFRS) as adopted by the European Union and the format and disclosures required by those Standards, some of which may not conform to or be required by generally accepted accounting principles in other countries. In the event of discrepancies, the Portuguese language version prevails.

Statutory Auditor's Report and Auditors' Report

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STATUTORY AUDITORS' REPORT and AUDITORS' REPORT

(Free translation from a report originally issued in Portuguese language. In case of doubt the Portuguese version will always prevail.)

REPORT ON THE AUDIT OF THE CONSOLIDATED FINANCIAL STATEMENTS

Opinion

We have audited the accompanying consolidated financial statements of **NOS, SGPS, S.A.** (the Group), which comprise the consolidated statement of financial position as at 31 December 2024 (showing a total of 3,359,787 thousand euros and total equity of 1,086,978 thousand euros, including a net profit for the year attributable to the shareholders of the parent company of 272,259 thousand euros), and the consolidated income statement by nature, consolidated statement of comprehensive income, consolidated statement of changes in equity and consolidated statement of cash flows for the year then ended, and notes to the consolidated financial statements, including material accounting policy information.

In our opinion, the accompanying consolidated financial statements give a true and fair view, in all material respects, of the consolidated financial position of **the Group** as at 31 December 2024 and of its consolidated financial performance and its consolidated cash flows for the year then ended in accordance with the International Financial Reporting Standards (IFRS) as adopted by the European Union.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs) and further technical and ethical standards and guidelines as issued by Ordem dos Revisores Oficiais de Contas (the Portuguese Institute of Statutory Auditors). Our responsibilities under those standards are further described in the "Auditors' responsibilities for the audit of the consolidated financial statements" section below. We are independent of the entities that comprise the Group in accordance with the law and we have fulfilled other ethical requirements in accordance with the Ordem dos Revisores Oficiais de Contas' code of ethics.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the consolidated financial statements of the current year. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

KPMG & Associados – Sociedade de Revisores Oficiais de Contas, S.A., a Portuguese private limited company and a member firm of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee.

KPMG & Associados – Sociedade de Revisores Oficiais de Contas, S.A.
Capital Social: 3.916.000 Euros – Pessoa Colectiva Nº PT 502 161 078 – Inscrito na O.R.O.C. Nº 189 – Inscrito na C.M.V.M. Nº 20161489
Matriculada na Conservatória do Registo Comercial de Lisboa sob o Nº PT 502 161 078



Recognition and measurement of revenue related to telecommunications services (1,480,331 thousand euros)

Refer to note 2.3.19 and 6. of the consolidated financial statements

The Risk

The recognition of revenue related to telecommunications services was considered a key audit matter due to the materiality of the amounts involved, the high volume of transactions, the complexity of the information systems supporting this process, the higher competitive pressure, as well as the significant involvement of the audit team (including specialists) in executing the planned audit approach.

Our response to the identified risk

Our audit procedures included, amongst others, those that we describe below:

- We evaluated the design, implementation, and operating effectiveness of the key controls implemented by the Group related to this matter, including the involvement of our specialists in assessing general IT controls and testing relevant application controls within the revenue process;
- We performed substantive analytical procedures on revenue line items, using an appropriately disaggregated level of data, including analyses of variations compared to prior periods and trend analyses, developed through expectations based on relevant operational and market indicators;
- We carried out data analytics procedures to identify outliers or unexpected trends;
- We analysed the existing service offerings (and their attributes) and inspected various types of contracts entered into, to assess the correct revenue recognition, including appropriate consideration, the identification of performance obligations, and the contract value;
- We verified the correct allocation of revenue to the identified performance obligations, as well as the existence of the transaction/customer;
- In developing the audit procedures, we applied sampling techniques and varied approaches to introduce unpredictability in the procedures performed;
- We tested transactions occurring at the end of the reporting period and the beginning of the subsequent period to ensure the correct revenue recognition; and,
- We assessed the adequacy of the respective disclosures to the financial statements, in accordance with the applicable accounting framework.

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Recoverability of goodwill (641,400 thousand euros)

Refer to note 2.3.5, 3.1. and 9. of the consolidated financial statements

The Risk

The recoverability of goodwill allocated to the cash-generating units of the Telco (564,799 thousand euros) and Audiovisuals (76,601 thousand euros) segments was considered a key audit matter due to the materiality of the amounts involved and the complexity and subjectivity associated with impairment testing, namely due to the inherent uncertainty in financial projections, which are based on the expectations of the Board of Directors, materialised in business plans that rely on various assumptions, related to discount rates, market shares, projected margins, short-term and long-term growth rates, and investment plans, which are not directly observable in the market.

Our response to the identified risk

Our audit procedures included, amongst others, those that we describe below:

- We evaluated the design, implementation, and operating effectiveness of the key controls implemented by the Group related to this matter and analysed the budgeting procedures on which the projections are based, by comparing current performance with estimates made in previous periods and assessing the integrity of the discounted cash flows model;
- We assessed, with the support of our specialists, the internal and external assumptions used and their reasonableness, such as current business trends, market performance, inflation, projected economic growth, and discount rates;
- We performed sensitivity analyses to assess the robustness of the assumptions and forecasts used;
- We involved our specialists in determining the weighted average cost of capital;
- We evaluated the methodology applied and the mathematical accuracy of the models; and,
- We assessed the adequacy of the respective disclosures to the financial statements, in accordance with the applicable accounting framework.

Capitalisation of expenditures on tangible fixed assets, intangible assets, and charges for contracts with clients (372,670 thousand euros)

Refer to note 2.3.3., 2.3.5., 2.3.6., 3.1., 8., 9. and 10. of the consolidated financial statements

The Risk

The capitalisation of internal and external expenditures on tangible fixed assets, intangible assets, and charges for contracts with clients was considered a key audit matter due to the materiality of the amounts involved and the complexity associated with verifying compliance with the capitalisation requirements set out in the applicable financial reporting framework.

Our response to the identified risk

Our audit procedures included, amongst others, those that we describe below:

- We analysed the Group's capitalisation policies for expenditures on tangible fixed assets, intangible assets, and charges for contracts with clients with reference to the applicable accounting standards;
- We evaluated the design and implementation of the key controls implemented by the Group related to this matter;
- We performed detailed testing on samples of transactions related to capitalisations occurring during the period, to test compliance with the capitalisation requirements set out in the applicable financial reporting framework;
- We inquired management about the occurrence of any improper capitalisation instances during the period;
- We performed data analytics procedures and detailed testing of accounting records to identify and test the risk of fraud and any potential override of the implemented controls; and,
- We assessed the adequacy of the respective disclosures to the financial statements, in accordance with the applicable accounting framework.

Recognition, measurement, and disclosure of tax, regulatory, and legal contingencies, and uncertainty over income tax treatments (89,761 thousand euros)

Refer to note 2.3.14., 2.3.16., 3.1., 14, 26. and 47. of the consolidated financial statements

The Risk

The Group is involved in various disputes and situations that may result in the recognition of provisions or disclosure of contingent liabilities, of a legal, regulatory, and tax nature, as well as in transactions and circumstances with uncertain tax treatment, in relation to which the inherent complexity requires the exercise of judgment in determining and measuring the risks and uncertainties in defining the best estimate, by weighing all possible outcomes under its control and their associated probabilities. The estimation of potential amounts to be incurred requires a high degree of judgment by the Board of Directors, which assesses the likelihood of the outcome, supported by the opinions of legal and tax advisors, and therefore, this was considered a key audit matter.

Our response to the identified risk

Our audit procedures included, amongst others, those that we describe below:

- We evaluated the processes for identifying and monitoring uncertain tax positions over income tax treatments and situations that may result in the recognition of provisions or disclosure of contingent liabilities of a legal, regulatory, and tax nature, including the design and implementation of the key controls in place, as well as inquired management and those responsible for the legal and tax areas regarding the basis of their estimates and judgments;
- We analysed ongoing legal, regulatory, and tax processes, situations that may result in the recognition of provisions or disclosure of contingent liabilities of a legal, regulatory, and tax nature, and potential uncertain tax positions, considering the effect of the uncertainty regarding their outcome, with the support of tax specialists and a review of existing documentation, including, where applicable, explanatory memoranda prepared by external and internal lawyers;
- We analysed the responses to information requests made to internal and external lawyers;
- We assessed the outcome of legal, regulatory, and tax processes compared to the estimated outcome from the prior period;
- We evaluated the consistency of the criteria used in comparison with previous years;
- We assessed the existence of events after the reporting period that may contradict the estimates reflected in the financial statements; and,
- We assessed the adequacy of the respective disclosures to the financial statements, in accordance with the applicable accounting framework.

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Other matters

The consolidated financial statements for the year ended 31 December 2023, presented for comparative purposes, were audited by another statutory auditor, who issued a Statutory Auditors' Report and Auditor's Report, dated 5 March 2024. We were engaged on 12 April 2024 to perform an audit to the financial statements for the year starting on 1 January 2024.

Responsibilities of management and the supervisory body for the consolidated financial statements

Management is responsible for:

- the preparation of consolidated financial statements that give a true and fair view of the Group's consolidated financial position, financial performance and the consolidated cash flows, in accordance with the International Financial Reporting Standards as adopted by the European Union;
- the preparation of the consolidated management report, the corporate governance report, the consolidated non-financial information and the remunerations' report in accordance with applicable laws and regulations;
- designing and maintaining an appropriate internal control system to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error;
- the adoption of accounting policies and principles appropriate in the circumstances; and,
- assessing the Group's ability to continue as a going concern, and disclosing, as applicable, the matters that may cast significant doubt about the Group's ability to continue as a going concern.

The supervisory body is responsible for overseeing the Group's financial reporting process.

Auditors' responsibilities for the audit of the consolidated financial statements

Our responsibility is to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatements whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal control;

- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control;
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management;
- conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Group to cease to continue as a going concern;
- evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and the events in a manner that achieves fair presentation;
- plan and perform the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group as a basis for forming an opinion on the consolidated financial statements. We are responsible for the direction, supervision and review of the audit work performed for purposes of the group audit. We remain solely responsible for our audit opinion.
- communicate with those charged with governance, including the supervisory body, regarding, among other matters, the planned scope and timing of the audit, and significant audit findings including any significant deficiencies in internal control that we identify during our audit;
- determine, from the matters communicated with those charged with governance, including the supervisory body, those matters that were of most significance in the audit of the consolidated financial statements of the current year and are therefore the key audit matters. We describe these matters in our auditors' report unless law or regulation precludes their public disclosure; and,
- provide the supervisory body with a statement that we have complied with the relevant ethical requirements regarding independence, and communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

Our responsibility also includes the verification that the information contained in the consolidated management report is consistent with the financial statements, and the verification of the requirements as provided in numbers 4 and 5 of article 451 of the Portuguese Companies' Code regarding the corporate governance report, as well as the verification that the non-financial information and the remunerations report were presented.

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REPORT ON OTHER LEGAL AND REGULATORY REQUIREMENTS

On the consolidated management report

Pursuant to article 451, nr. 3, al. (e) of the Portuguese Companies' Code, it is our opinion that the consolidated management report was prepared in accordance with the applicable legal and regulatory requirements and the information contained therein is consistent with the audited consolidated financial statements and, having regard to our knowledge and assessment of the Group, we have not identified any material misstatements. As defined in the article 451, nr. 7 of the Portuguese Companies' Code, this opinion is not applicable to the consolidated non-financial statement that is included in the consolidated management report.

On the consolidated corporate governance report

Pursuant to article 451, nr. 4, of the Portuguese Companies' Code, it is our opinion that the corporate governance report includes the information required to the Group to provide under article 29-H of the Securities Code, and we have not identified any material misstatements on the information provided therein in compliance with paragraphs c), d), f), h), i) and l) of nr. 1 of that article.

On the non-financial information

Pursuant to article 451, nr. 6, of the Portuguese Companies' Code, we inform that the Group has included in its management report the non-financial statement defined in article 508-G of the Portuguese Companies' Code.

On the remunerations' report

Pursuant to article 26-G, nr. 6, of the Securities Code, we inform that the Group has included in the corporate governance report in a separate chapter the information defined in nr. 2 of that article.

On the European Single Electronic Format (ESEF)

The NOS, SGPS, S.A.'s consolidated financial statements for the year ended 31 December 2024 have to comply with the applicable requirements established by the Commission Delegated Regulation 2019/815 of 17 December 2018 (ESEF Regulation).

Management is responsible for the preparation and presentation of the annual report in accordance with the ESEF Regulation.

Our responsibility is to obtain reasonable assurance about whether the consolidated financial statements, included in the annual report, have been prepared in accordance with the requirements of the ESEF Regulation.

Our procedures considered the OROC (Portuguese Institute of Statutory Auditors) technical application guide on ESEF reporting and included, amongst others:

- obtaining an understanding of the financial reporting process, including the presentation of the annual report in a valid XHTML format.
- identifying and assessing the risks of material misstatement related to the tagging of information in the financial statements, in XBRL format using iXBRL technology. This assessment was based on an understanding of the information tagging process implemented by the Entity.

In our opinion, the consolidated financial statements, included in the annual report, are presented, in all material respects, in accordance with the requirements established by the ESEF Regulation.

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On the additional matters provided in article 10 of the Regulation (EU) nr. 537/2014

Pursuant to article 10 of the Regulation (EU) nr. 537/2014 of the European Parliament and of the Council, of 16 April 2014, and in addition to the key audit matters mentioned above, we also report the following:

- We were first appointed as auditors of NOS, SGPS, S.A. (parent Entity of the Group) in the shareholders general assembly held on 12 April 2024 for a first mandate from 2024 to 2027.
- Management as confirmed to us that they are not aware of any fraud or suspicion of fraud having occurred that has a material effect on the financial statements. In planning and executing our audit in accordance with ISAs we maintained professional skepticism, and we designed audit procedures to respond to the possibility of material misstatement in the consolidated financial statements due to fraud. As a result of our work, we have not identified any material misstatement of the consolidated financial statements due to fraud.
- We confirm that the audit opinion we issue is consistent with the additional report that we prepared and delivered to the supervisory body of the Group on 21 February 2025.
- We declare that we have not provided any prohibited services as described in article 5 of the Regulation (EU) nr. 537/2014 of the European Parliament and of the Council, of 16 April 2014, and we have remained independent of the Entity in conducting the audit.
- We inform that, in addition to the audit, we provided to the Group with the following services as permitted by law and regulations in force:
  - Limited review of the condensed consolidated financial statements of NOS, SGPS, S.A., for the three-month period ended 31 March 2024, six-month period ended 30 June 2024 and nine-month period ended 30 September 2024; and,
  - Limited assurance on the reliability of the sustainability information ("sustainability report") of NOS, SGPS, S.A. for the year ended 31 December 2024, prepared in accordance with the requirements of the "European Sustainability Reporting Standards" ("ESRS Standards"), included in the Management Report (under the non-financial statement chapter), and related to the disclosure requirements set out in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation), presented separately in the "sustainability report".

26 February 2025

SIGNED ON THE ORIGINAL

KPMG & Associados -
Sociedade de Revisores Oficiais de Contas, S.A.
(nr. 189 and registered at CMVM with the nr. 20161489)
represented by
Pedro Jorge Quental e Cruz
(ROC nr. 1765 and registered at CMVM with the nr. 20161607)



04

WE PROMOTE LINKS

BETWEEN EVERYTHING AND EVERYONE

INDIVIDUAL FINANCIAL STATEMENTS

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Statement of financial position

As at 31 December 2023 and 2024

(Amounts expressed in Euro)

	Notes	31/12/2023	31/12/2024
Assets			
Non-current assets:			
Tangible fixed assets	6	147,142	145,715
Intangible assets	7	453,888,881	453,888,881
Rights of use	8	102,004	222,514
Investments in subsidiaries and associates	9	1,849,963,149	1,607,204,635
Accounts receivable	5 and 10	98,945,000	375,826,500
Other financial investments	5 and 12	12,950	12,950
Deferred tax assets	13	1,709,844	974,513
Derivative financial instruments	5 and 21	5,386,308	2,457,084
Total non-current assets		**2,410,155,278**	**2,440,732,792**
Current assets:			
Accounts receivable	5 and 10	109,923,724	98,101,308
Recoverable taxes	11	30,822,473	153,656
Deferred costs	14	175,200	255,802
Cash and cash equivalents	5 and 15	11,187,505	5,289,149
Total current assets		**152,108,902**	**103,799,915**
Total Assets		**2,562,264,180**	**2,544,532,707**

	Notes	31/12/2023	31/12/2024
Equity			
Share capital	16.1	855,167,891	855,167,891
Share premium	16.2	4,202,356	4,202,356
Own shares	16.3	(15,058,990)	(15,002,081)
Legal reserve	16.4	4,373,733	4,692,449
Other reserves and retained earnings	16.4	348,411,872	173,985,108
Net profit/ (loss)		6,374,321	194,763,088
Total equity		**1,203,471,183**	**1,217,808,811**
Liabilities			
Non-current liabilities:			
Borrowings	5 and 17	949,869,950	757,691,291
Provisions	18	3,031,945	621,752
Taxes payable	3.2 and 11	1,316,573	1,358,459
Accruals	5 and 19	454,886	454,887
Derivative financial instruments	5 and 21	1,035,978	-
Deferred tax liabilities	3.2 and 13	1,211,919	528,273
Total non-current liabilities		**956,921,251**	**760,654,662**
Current liabilities:			
Borrowings	5 and 17	148,107,877	163,790,007
Accounts payable	5 and 22	251,035,796	362,764,068
Taxes payable	3.2 and 11	288,299	36,751,160
Accruals	5 and 19	2,421,201	2,580,484
Deferred income	20	18,573	-
Derivative financial instruments	5 and 21	-	183,515
Total current liabilities		**401,871,746**	**566,069,234**
Total liabilities		**1,358,792,997**	**1,326,723,896**
Total Equity and Liabilities		**2,562,264,180**	**2,544,532,707**

The accompanying notes form an integral part of the statement of financial position for the year ended 31 December 2024.

The Certified Accountant

The Board of Directors

Income statement by nature

As at 31 December 2023 and 2024

(Amounts expressed in Euro)

	Notes	31/12/2023	31/12/2024
Revenue:			
Services rendered	23	21,475,143	21,698,425
Other income		7,240	6,935
		21,482,383	**21,705,360**
Costs, losses, and gains:			
Payroll	24	7,818,282	7,847,507
Marketing and advertising		1,235	-
Support services	25	1,594,654	1,588,443
External supplies and services	25	594,331	597,360
Other operating costs/(gains)	26	52,063	53,178
Indirect taxes		127,609	79,031
Provisions and adjustments	18	313,204	(57,434)
Depreciation, amortisation and impairment losses	6, 7 and 8	121,273	132,139
Restructuring costs	27	2,784,685	19,796
Other non-recurring costs / (gains)	28	(22,488)	(15,123)
		13,384,848	**10,244,897**
Profit before financial results and taxes		**8,097,535**	**11,460,463**
Financing costs / (gains)	29	2,261,702	36,632,377
Losses / (gains) on exchange rate variations		(166)	271
Losses / (gains) in subsidiaries	30	(4,691,222)	(217,149,443)
Other financial costs / (income)	29	3,081,118	3,010,815
		651,432	**(177,505,980)**
Profit before tax		7,446,103	188,966,443
Income tax	13	1,071,782	(5,796,645)
Net profit/ (loss) for the year		6,374,321	194,763,088
Net profit/ (loss) per share			
Basic - Euro	16.6	0.01	0.38
Diluted - Euro	16.6	0.01	0.38

The accompanying notes form an integral part of the income statement by nature for the year ended 31 December 2024.

The Certified Accountant

The Board of Directors

Statement of comprehensive income

As at 31 December 2023 and 2024

(Amounts expressed in Euro)

	Notes	31/12/2023	31/12/2024
Net profit/ (loss) for the year		**6,734,321**	**194,763,088**
Other income			
Items that reclassify by profit or loss:			
Fair value of derivative financial instruments	21	(6,596,174)	(2,076,761)
Deferred tax - interest rate derivatives	21	1,484,139	490,007
Income recognised directly in equity		**(5,112,035)**	**(1,586,754)**
Total comprehensive income for the year		**1,622,286**	**193,176,334**

The accompanying notes form an integral part of the statement of comprehensive income for the year ended 31 December 2024.

The Certified Accountant

The Board of Directors

Statement of changes in equity

As at 31 December 2023 and 2024
(Amounts expressed in Euro)

	Notes	Share capital	Share premium	Own shares	Legal reserve	Reserves for own shares	Reserves for medium-term incentive plans	Hedging reserves	Other reserves and retained earnings	Net profit/ (loss)	Total
Balance as at 1 January 2023		**855,167,891**	**4,202,356**	**(15,967,529)**	**1,030,323**	**15,967,529**	**6,674,984**	**8,483,541**	**478,745,182**	**66,868,204**	**1,421,172,481**
Profit appropriation											
Transfer to reserves		-	-	-	3,343,410	-	-	-	63,524,794	(66,868,204)	-
Dividends paid	16.5	-	-	-	-	-	-	-	(219,986,824)	-	(219,986,824)
Acquisition of own shares	16.3	-	-	(5,171,275)	-	5,171,275	-	-	(5,171,275)	-	(5,171,275)
Distribution of own shares under share plans	16.3	-	-	5,969,560	-	(5,969,560)	(4,670,098)	-	4,670,098	-	-
Distribution of own shares under other remunerations	34	-	-	110,254	-	(110,254)	-	-	116,633	-	116,633
Share plan - Costs recognised in the year and others	34	-	-	-	-	-	5,094,232	-	-	-	5,094,232
Share plan - Debit to subsidiaries	34	-	-	-	-	-	-	-	983,650	-	983,650
Comprehensive income for the year		-	-	-	-	-	-	(5,112,035)	-	6,374,321	1,262,286
Balance as at 31 December 2023		**855,167,891**	**4,202,356**	**(15,058,990)**	**4,373,733**	**15,058,990**	**7,099,118**	**3,371,506**	**322,882,258**	**6,374,321**	**1,203,471,183**
Balance as at 1 January 2024		**855,167,891**	**4,202,356**	**(15,058,990)**	**4,373,733**	**15,058,990**	**7,099,118**	**3,371,506**	**322,882,258**	**6,374,321**	**1,203,471,183**
Profit appropriation											
Transfer to reserves		-	-	-	318.716	-	-	-	6.055.605	(6.374.321)	-
Dividends paid	16.5	-	-	-	-	-	-	-	(178.958.356)	-	(178.958.356)
Share capital increase by incorporation of share premium	16.1	-	-	-	-	-	-	-	-	-	-
Acquisition of own shares	16.3	-	-	(4,260,625)	-	4,260,615	-	-	(4,260,615)	-	(4,260,625)
Distribution of own shares under share plans	16.3	-	-	4,196,932	-	(4,196,932)	(3,276,837)	-	3,276,837	-	-
Distribution of own shares as part of other remunerations	16.3	-	-	120,602	-	(120,592)	-	-	113,468	-	113,478
Share plans - Plan costs settled in cash	34	-	-	-	-	-	(1,180,255)	-	-	-	(1,180,255)
Share plan - Costs recognised in the year and others	34	-	-	-	-	-	4,661,661	-	-	-	4,661,661
Share plan - Debit to subsidiaries	34	-	-	-	-	-	-	-	785,391	-	785,391
Comprehensive income for the year		-	-	-	-	-	-	(1,586,754)	-	194,763,088	193,176,334
Balance as at 31 December 2024		**855,167,891**	**4,202,356**	**(15,002,081)**	**4,692,449**	**15,002,081**	**7,303,687**	**1,784,752**	**149,894,588**	**194,763,088**	**1,217,808,811**

The accompanying notes form an integral part of the statement of changes in equity for the year ended 31 December 2024,

The Certified Accountant

The Board of Directors

Cash flow statement

As at 31 December 2023 and 2024

(Amounts expressed in Euro)

	Notes	31/12/2023	31/12/2024
Operational activities			
Receipts from customers		20,618,467	27,750,517
Payments to suppliers		(2,570,587)	(2,965,406)
Payments to staff		(6,211,906)	(8,548,848)
Receipts / (payments) related to income tax		(21,719,829)	28,867,549
Other receipts / (payments) relating to operating activities		(9,914,606)	(3,943,704)
Flows from operating activities (1)		**(19,798,461)**	**41,160,108**
Investment activities			
Receipts from			
Financial investments	9	1,100,000	442,097,998
Interest and similar income		36,917,765	13,212,703
Dividends		33,063,022	19,046,209
		210,803,805	**474,356,910**
Payments relating to			
Financial investments		(240,000)	(136,250)
Tangible fixed assets		(6,958)	(2,946)
Loans granted		(15,761,064)	(219,304,114)
		(16,008,022)	**(219,443,310)**
Flows from investing activities (2)		**194,795,783**	**254,913,600**
Financing activities			
Receipts from			
Borrowings		702,200,000	332,200,000
Borrowings from related parties		139,723,018	109,020,710
		841,923,018	**441,220,710**
Payments relating to			
Borrowings		(606,600,000)	(507,300,000)
Amortisation of lease contracts		(118,057)	(123,759)
Interest and similar costs		(41,802,334)	(52,532,967)
Dividends	16.5	(219,986.824)	(178,958,356)
Acquisition of own shares	16.3	(5,171,275)	(4,260,615)
		(873,678,490)	**(743,175,697)**
Flows from financing activities (3)		**(171,478,490)**	**(301,954,987)**
Change in cash and cash equivalents (4)=(1)+(2)+(3)		3,518,832	(5,881,279)
Cash and cash equivalents at the beginning of the year		7,633,072	11,151,904
Cash and cash equivalents at the end of the year		**11,151,904**	**5,270,625**
Cash and cash equivalents	15	11,187,505	5,289,149
Bank overdrafts	17	(35,601)	(18,524)

The accompanying notes form an integral part of the cash flow statement for the year ended 31 December 2024.

The Certified Accountant The Board of Directors

Notes to the Individual Financial Statements

As at 31 December 2024

(Amounts expressed in thousands of euros, except where indicated)

1. Introductory Note

NOS, SGPS, S.A. ("NOS", "NOS SGPS" or "Company"), whose name has not changed during the year, was formerly known as ZON OPTIMUS, SGPS, S.A. ("ZON OPTIMUS") and until 27 August 2013 as ZON Multimédia - Serviços de Telecomunicações e Multimédia, SGPS, S. A. ("ZON"). ("ZON"), currently with registered offices at Rua Actor António Silva, nº 9, Campo Grande, was incorporated by Portugal Telecom, SGPS, S.A. ("Portugal Telecom") on 15 July 1999 with the aim of developing its multimedia business strategy through it.

During 2007, Portugal Telecom carried out the spinoff of ZON, with the attribution of its stake in this company to its shareholders, which became totally independent from Portugal Telecom.

During 2013, ZON and Optimus, SGPS, S.A. ("Optimus SGPS") completed a merger by incorporation of Optimus SGPS into ZON, with the Company adopting the name ZON OPTIMUS, SGPS, S.A. on that date.

On 20 June 2014, as a result of the launch of the new "NOS" brand on 16 May 2014, the General Meeting approved the change in the Company's name to NOS, SGPS, S.A.

The businesses operated by NOS and its subsidiaries ("Group" or "NOS Group") include cable and satellite television services, voice services and Internet access, the publishing and sale of video grams, advertising on pay-TV channels, the operation of cinemas, the distribution of films, the production of pay-TV channels, datacentre management, licensing and the provision of engineering and consultancy services in the area of information systems, predominantly in the Portuguese market.

The shares representing the capital of NOS are listed on the stock exchange Euronext - Lisbon. The Group's shareholder structure as at 31 December 2024 is shown in Note 16.

The notes in this annex follow the order in which the items are presented in the financial statements.

The accompanying financial statements refer to the Company on an individual and not consolidated basis and have been prepared for publication in accordance with current commercial legislation.

In accordance with the IFRS, financial investments were recognised at cost. Consequently, the accompanying financial statements do not include the effect of consolidating assets, liabilities, income, and expenses, which will be done in the consolidated financial statements. The effect of this consolidation is to increase assets and net profit for the year by Euro 815,254 thousand and Euro 78,311 thousand, respectively, and to reduce equity by Euro 130,831 thousand.

The financial statements for the year ended 31 December 2024 were approved by the Board of Directors and authorised for issue on 26 February 2025.

They are also subject to approval by the General Shareholders' Meeting, under the terms of the commercial legislation in force in Portugal.

The Board of Directors believes that these financial statements give a true and fair view of the company's operations, financial performance, and cash flows.

2. Accounting policies

The main accounting policies applied in preparing the financial statements are described below. These policies have been consistently applied to all financial years presented, unless otherwise stated.

2.1. Basis of preparation

The accompanying financial statements have been prepared in accordance with the International Financial Reporting Standards ("IAS/IFRS") issued by the International Accounting Standards Board ("IASB") and Interpretations issued by the International Financial Reporting Interpretations Committee ("IFRIC") or the former Standing Interpretations Committee ("SIC"), adopted by the European Union, in force on 1 January 2024.

The financial statements are presented in Euros, as this is the main currency of the company's operations.

The financial statements have been prepared on a going concern basis from the Company's accounting books and records and under the historical cost convention, modified, where applicable, by the valuation of financial assets and liabilities (including derivatives) at fair value.

In preparing the financial statements in accordance with IFRS, the Board of Directors used estimates, assumptions and critical judgements that impact the value of assets and liabilities and the recognition of income and expenses for each reporting period. Although these estimates are based on the best information available at the date of preparation of the financial statements, current and future results may differ from these estimates. The areas involving a greater degree of judgement, complexity or where assumptions and estimates are significant for the financial statements are presented in Note 3.1.

The Board of Directors believes that there are no material uncertainties that could jeopardise the going concern assumption, despite current liabilities being higher than current assets. An analysis was carried out and it was concluded that the entity has the necessary resources to continue its operations into the future, for a period of no less than 12 months from the reporting date.

In the preparation and presentation of the financial statements, NOS declares that it complies, explicitly and without reservation, with the IAS/IFRS standards and their SIC/IFRIC interpretations, approved by the European Union.

Changes in accounting policies and disclosures

The following standards, interpretations, amendments, and revisions endorsed by the European Union have mandatory application for the first time in the financial year beginning on 1 January 2024:

- Amendments to IAS 1 - Presentation of financial statements - Classification of current and non-current liabilities. On 23 January 2020, the IASB issued an amendment to IAS 1 Presentation of Financial Statements. This amendment aims to clarify the classification of liabilities as current or non-current balances depending on the rights an entity must defer their payment at the end of each reporting period. The amendments aim to

- specify that an entity's right to defer settlement must exist at the end of the reporting period and must be substantive;
- clarify that the ratios that the company must fulfil after the balance sheet date (i.e. future ratios) do not affect the classification of a liability on the balance sheet date. However, when non-current liabilities are subject to future ratios, companies must disclose information that allows users to understand the risk that these liabilities may be repaid within 12 months of the balance sheet date; and
- clarify the requirements for classifying liabilities that an entity will settle, or can settle, by issuing its own equity instruments (e.g. convertible debt).

- Amendment to IAS 7 and IFRS 7 - Disclosures: Supplier financing arrangements. These amendments to IAS 7 Statement of Cash Flows and IFRS 7 Financial Instruments: Disclosures, aim to clarify the characteristics of a supplier financing arrangement and introduce additional disclosure requirements when such arrangements exist. The disclosure requirements are intended to help users of financial statements understand the effects of supplier financing arrangements on the entity's liabilities, cash flows and exposure to liquidity risk. The changes come into effect for the period beginning on or after 1 January 2024. The new requirements complement those already included in the IFRS and include disclosures about:
  - terms and conditions of supplier financing agreements;
  - the amounts of the liabilities that are the subject of such agreements, the extent to which suppliers have already received payments from the lenders and the heading under which these liabilities are presented in the balance sheet;
  - the due date ranges; and
  - information on liquidity risk.
- Amendments to IFRS 16 - Leases - Lease liabilities in a sale and leaseback transaction. This amendment to IFRS 16 introduces guidance on the subsequent measurement of lease liabilities related to sale and leaseback transactions that qualify as a "sale" in accordance with the principles of IFRS 15, with greater impact when some or all the lease payments are variable lease payments that do not depend on an index or a rate. The amendments confirm that:
  - on initial recognition, the seller - lessee includes variable lease payments when measuring a lease liability arising from a sale and leaseback transaction.
  - after initial recognition, the seller - lessee applies the general requirements for subsequent accounting of the lease liability, so that it does not recognise any gain or loss related to the right of use it retains.

  A seller-lessee may adopt different approaches that satisfy the new subsequent measurement requirements. On initial recognition, the seller-lessee includes variable lease payments when measuring a lease liability arising from a sale and leaseback transaction. When subsequently measuring lease liabilities, seller-lessees should determine "lease payments" and "revised lease payments" in such a way that they do not recognise gains/(losses) in respect of the right of use they retain. A seller-lessee may adopt different approaches that fulfil the new subsequent measurement requirements. This amendment is retrospective.

In accordance with IAS 8 - Accounting Policies, Changes in Accounting Estimates and Errors, a seller - lessee will have to apply the changes retrospectively to sale and leaseback transactions entered into since the date of initial application of IFRS 16. This means that it will have to identify and re-analyse sale and leaseback transactions entered since the implementation of IFRS 16 in 2019 and, potentially, restate those that included variable lease payments.

These standards and changes had no material impact on NOS' financial statements.

The following standards, interpretations, amendments, and revisions, with mandatory application in future financial years, have been endorsed by the European Union up to the date of approval of these financial statements:

- Amendments to IAS 21 - The Effects of Changes in Foreign Exchange Rates: Lack of Convertibility The amendments clarify how an entity should assess whether a currency is convertible or not and how it should determine a spot exchange rate in situations of lack of convertibility. A currency is convertible into another currency when an entity can exchange that currency for another currency on the measurement date and for a specific purpose. When a currency is not convertible, the entity must estimate a spot exchange rate. According to the amendments, entities will have to provide new disclosures to help users assess the impact of using an estimated exchange rate in the financial statements. These disclosures may include:
    - the nature and financial impacts of the currency not being convertible;
    - the spot exchange rate used;
    - estimation process; and
    - the risks for the company because the currency is not convertible;

The changes apply to annual reporting periods beginning on or after 1 January 2025. Early application is permitted.

This amendment was not applied in advance by NOS in the year ended 31 December 2024. NOS is analysing the possible impacts arising from the application of the amendment and no significant impacts are estimated.

The following standards, interpretations, amendments, and revisions, with mandatory application in the financial year and in future financial years, have not been endorsed by the European Union as of the date of approval of these financial statements:

- Annual Improvements - Volume 11 - The changes impact the following standards:
    - IFRS 1 First-time adoption of International Financial Reporting Standards - Hedge accounting by a first-time adopter;
    - IFRS 7 Financial Instruments: Disclosures and the respective Implementation Guide, in order to clarify:
        - the application guide, regarding Gain and loss on derecognition; and
        - the implementation guide, namely its Introduction, Fair Value paragraph (disclosures regarding the difference between fair value and transaction price) and Credit Risk disclosure.

- IFRS 9 Financial Instruments:
  - derecognition of lease liabilities;
  - transaction price;
- IFRS 10 Consolidated Financial Statements - Determination of a 'de facto agent';
- IAS 7 Statement of Cash Flows - Cost Method.

The amendments apply to annual reporting periods beginning on or after 1 January 2026. Early application is permitted.

- IFRS 18 - Presentation and Disclosure of Financial Statements. This standard will replace IAS 1 Presentation of Financial Statements and aims to improve comparability and increase transparency. The main changes introduced by this standard are:
  - promotes a more structured income statement. It introduces a new subtotal "operating profit" (as well as its definition) and the requirement that all income and expenses be classified into three new distinct categories based on a company's main business activities: Operating, Investment and Financing.
  - requirement for companies to analyse their operating expenses directly on the face of the income statement - either by nature, by function or in a mixed way.
  - requirement for some of the 'non-GAAP' measures that the Group uses to be reported in the financial statements. The standard defines non-GAAP performance measures as a subtotal of income and expenses that:
    - are used in public communications outside the financial statements; and
    - communicate management's view of financial performance

    For each MPM presented, companies will need to explain in a single note in the financial statements why the measure provides useful information, how it is calculated, and reconcile it with a value determined in accordance with IFRS.
  - o introduction of improved guidance on how companies group information in financial statements. Includes guidance on whether material information is included in the primary financial statements or is more detailed in the notes.

The standard applies to annual reporting periods beginning on or after 1 January 2027 and is applied retrospectively. Early application is permitted

- IFRS 19 - Subsidiaries without Public Responsibility: Disclosures. This standard allows eligible subsidiaries to choose to apply the reduced disclosure requirements of IFRS 19, while continuing to apply the recognition, measurement, and presentation requirements of other IFRS accounting standards. Application of the standard is optional for eligible subsidiaries. An entity that applies IFRS 19 is required to disclose that fact as part of its general statement of compliance with IFRS accounting standards. A subsidiary may choose to apply the new standard in its consolidated, individual, or separate financial statements, provided that, at the reporting date:
  - no public accountability;
  - its parent company prepares consolidated financial statements in accordance with

IFRS.

A subsidiary that applies IFRS 19 is required to state clearly in its explicit and unconditional statement of compliance with IFRS that IFRS 19 has been adopted.

The standard applies to annual reporting periods beginning on or after 1 January 2027 and is applied retrospectively. Early application is permitted.

- Amendments to IFRS 9 and IFRS 7 - Amendments to the classification and measurement of financial instruments - The amendments:

    - clarify the classification of financial assets with environmental, social, and corporate governance (ESG) characteristics and similar since these characteristics in loans can affect whether loans are measured at amortised cost or fair value. To resolve any potential diversity in practical application, the amendments clarify how the contractual cash flows of loans should be valued.

    - clarify the date on which a financial asset or financial liability is derecognised when it is settled through electronic payment systems. There is an accounting policy option that allows a financial liability to be derecognised before the cash is delivered on the settlement date if certain criteria are met.

    - improving the description of the term "non-recourse", according to the amendments, a financial asset has non-recourse characteristics if the ultimate right to receive cash flows from an entity is contractually limited to the cash flows generated by specific assets. The presence of non-recourse characteristics does not necessarily exclude the financial asset from complying with the SPPI, but its characteristics need to be carefully analysed.

    - clarify that a linked instrument must have a cascading payment structure that creates a concentration of credit risk by allocating losses disproportionately between different tranches. The underlying pool may include financial instruments that are not within the scope of IFRS 9 classification and measurement (e.g. finance leases), but must have cash flows equivalent to the SPPI criterion.

      The IASB has also introduced additional disclosure requirements relating to equity investments designated at fair value through other comprehensive income and financial instruments with contingent features, for example features linked to ESG targets.

The standard applies to annual reporting periods beginning on or after 1 January 2026 and is applied retrospectively. Early application is permitted.

- Amendments to IFRS 9 and IFRS 7 - Amendments to Contracts Referencing Nature-Dependent Electricity: On 18 December 2024, the International Accounting Standards Board (IASB) issued amendments to help companies better report the financial effects of nature-dependent electricity contracts, which are often structured as power purchase agreements (PPAs).

  Nature-dependent electricity contracts help companies secure their electricity supply from sources such as wind and solar power. The amount of electricity generated under these contracts can vary depending on non-controllable factors such as weather conditions. Current accounting requirements may not adequately reflect how these contracts affect a company's performance.

To enable companies to better reflect these contracts in their financial statements, the IASB has made specific amendments to IFRS 9 Financial Instruments and IFRS 7 Financial Instruments: Disclosures. The amendments include:

- clarification of the application of "own use" requirements;
- allowance for hedge accounting if these contracts are used as hedging instruments; and
- add new disclosure requirements to allow investors to understand the effect of these contracts on a company's financial performance and cash flows.

These amendments are effective for periods beginning on or after 1 January 2026. Early adoption is permitted.

These standards/amendments have not yet been endorsed by the European Union and, as such, were not applied by NOS during the year ended 31 December 2024. NOS is analysing the possible impacts of applying these new standards/amendments.

2.2. Foreign currency transactions and balances

Transactions in foreign currency are recorded at the exchange rates on the dates of the transactions. At each reporting date, the carrying amounts of monetary items denominated in foreign currency are updated at the exchange rates of that date. Non-monetary items recognised at fair value denominated in foreign currency are restated at the exchange rates of the dates on which their fair values were determined. Exchange rate variations generated on monetary items that constitute an extension of the investment denominated in the functional currency of the Company or the subsidiary in question are recognised in equity in the same way as the exchange rate variation on the investment. Exchange differences on non-monetary items are classified under "Other reserves".

Exchange rate differences calculated on the date of receipt or payment of transactions in foreign currency and those resulting from the aforementioned updates are recognised in the income statement for the year, under "Losses / (gains) on exchange rate variations", for all other balances or transactions.

As at 31 December 2023 and 2024, assets and liabilities expressed in foreign currencies were converted into Euro based on the following exchange rates for these currencies against the Euro, published by the Banco de Portugal:

	31-12-2023	31-12-2024
Currency		
US Dollar	1.1050	1.0389

2.3. Classification of the statement of financial position and income statement

The entity presents assets and liabilities in the statement of financial position based on their classification as current or non-current. An asset is classified as current when:

- the asset is expected to be paid up, or is intended to be sold or consumed, in the normal course of its operating cycle;

- if you hold the asset primarily for trading purposes;
- the asset is expected to be paid up within 12 months of the reporting period;
- the asset is cash or a cash equivalent unless it is restricted from being exchanged or used to settle a liability for at least 12 months after the reporting period.

A liability is classified as current when:

- the liability is expected to be settled in the normal course of its operating cycle;
- the liability is held primarily for trading purposes;
- the settlement of the liability is expected to take place within 12 months of the reporting period;
- does not have the right, at the end of the reporting period, to defer settlement of the liability for at least twelve months after the reporting period.

The entity's other assets and liabilities are classified as non-current.

Realisable assets and liabilities due within one year of the statement of financial position date are classified under current assets and current liabilities, respectively.

In accordance with IAS 1, "Restructuring costs", "Losses / (gains) on disposal of assets, net" and "Other non-recurring costs / (gains), net" reflect unusual costs and revenues that should be reported separately from the usual cost and revenue lines, in order to avoid distorting the financial information of regular operations, and to be consistent with the way in which the group's financial performance is analysed and monitored by management. These unusual costs and revenues may not be comparable to similarly titled measures used by other companies. When determining whether an event or transaction is unusual, management considers both quantitative and qualitative factors. Examples of unusual costs and revenues are: business restructuring programmes and respective indemnities; regulatory matters and lawsuits; extraordinary impairments of assets due to reduction in their recoverable value, disposal of non-current assets, among others. If costs and revenues fulfil these criteria, which are applied consistently from year to year, they are treated as unusual and presented in the specific lines above.

2.4. Tangible fixed assets

Tangible fixed assets are stated at acquisition cost, less accumulated depreciation and any impairment losses. The acquisition cost includes the purchase price of the asset, the expenses directly attributable to its acquisition and the costs incurred in preparing the asset for use. Expenses incurred with borrowings for the construction of tangible fixed assets are recognised as part of the asset's construction cost, whenever the construction/preparation period is longer than one year.

Subsequent costs incurred with renovations and major repairs that increase the useful life or productive capacity of the assets are recognised in the cost of the asset.

Repairs and maintenance costs of a current nature are recognised as an expense in the year in which they are incurred.

The estimated costs of dismantling or removing assets will be considered as part of the initial cost.

Tangible fixed assets are depreciated from the moment they are ready for use. These assets, less their residual value, are depreciated on a straight-line basis, in twelfths, from the month in which they are available for use, in accordance with the useful life of the assets, defined according to their expected usefulness.

The depreciation rates applied translate into the following estimated useful lives:

	2023	2024
Class of goods	(YEARS)	(YEARS)
Buildings and other constructions	10	10
Basic equipment	3 to 4	3 to 4
Transport equipment	4	4
Administrative equipment	2 to 10	2 to 10
Other tangible fixed assets	8	8

The useful lives and depreciation methods of the several assets are reviewed annually. The effect of any changes to these estimates is recognised in the income statement prospectively.

The residual values of assets and their useful lives are reviewed and adjusted, if necessary, on the balance sheet date. If the carrying amount exceeds the asset's recoverable value, it is readjusted to the estimated recoverable value by recording impairment losses (Note 2.6).

Gains and losses on disposals of tangible fixed assets, determined by the difference between the sale price and the respective net book value, are recognised in the income statement under "Losses / (gains) on disposals of assets".

2.5. Intangible assets

Intangible assets are recorded at acquisition cost less accumulated amortisation and impairment losses, where applicable.

Intangible assets are only recognised when they are identifiable, when future economic benefits will flow to the company and when they can be measured reliably.

The Company periodically assesses the impairment of intangible assets in progress. This impairment assessment is also performed whenever an event or change in circumstances is identified which indicates that the amount for which the asset is recognised may not be recovered. If there are such indications, the company determines the asset's recoverable value in order to determine the existence and extent of the impairment loss.

The useful lives of intangible assets are classified as defined or indefinite.

Intangible assets that have defined useful lives are amortised over their useful life, and an impairment analysis is carried out whenever there are indications that the amount for which the intangible asset is recorded may not be recovered. The amortisation period and amortisation method of an intangible asset with a defined useful life are reviewed periodically. Any changes

in the expected useful life or in the expected pattern of future consumption of the economic benefits embodied in the asset are considered when modifying the amortisation period or method and, if verified, are treated as changes in accounting estimates. The amortisation costs of intangible assets with defined lives are recognised in the income statement.

Assets with a defined useful life are amortised on a straight-line basis, in twelfths, from the beginning of the month in which they are available for use.

The amortisation rates used translate into the following estimated useful lives:

Class of goods	2023 (YEARS)	2024 (YEARS)
Software	3	3
Industrial property and other rights	3	3

Intangible assets with indefinite useful lives are not amortised, but impairment tests are performed annually.

Therefore, the useful life of an intangible asset that is not being amortised is reviewed periodically to determine whether events and circumstances continue to support an indefinite useful life assessment for that asset. If this is not the case, the change in the assessment of the useful life from indefinite to finite is accounted for as a change in an accounting estimate.

2.6. Goodwill

Goodwill represents the excess of the acquisition cost over the net fair value of identifiable assets, liabilities and contingent liabilities of a business, a subsidiary, a jointly controlled entity, or an associate, on the respective acquisition date, in accordance with IFRS 3.

Goodwill is presented as an element of the acquisition cost of financial holdings, in NOS separate accounts, when the business is incorporated into an entity.

In view of the policy followed by the company in recognising and measuring financial investments, goodwill is recorded as an asset and included under "Intangible assets" if the excess cost originates from an acquisition by merger and under "Investments in group companies" in the case of a controlled entity, jointly controlled entity, or associated company. Goodwill is not amortised but is subject to impairment tests at least once a year, on a specific date, and whenever, at the statement of financial position date, there are changes to the assumptions underlying the test carried out, which result in a possible loss of value. Any impairment loss is recognised immediately in the income statement under "Impairment losses" and cannot be reversed later.

For the purposes of carrying out impairment tests, goodwill is attributed to the cash-generating units to which it relates, which may correspond to the business segments in which the Company operates or at a lower level.

On the disposal of a controlled company, associate or jointly controlled entity, the corresponding goodwill is included in the determination of the corresponding realised gain or loss.

2.7. Business combinations between entities under common control

A business combination between entities under common control is a combination in which the companies or businesses acquired are ultimately controlled by the same entity or entities before and after the combination.

In these transactions the Group and the Company apply the fair value method, and no goodwill or bargain purchase gain is recognised.

By applying the Fair Value Method, any surplus or deficit between the consideration transferred and the fair value of the assets acquired and the liabilities and contingent liabilities assumed is treated as an equity transaction, i.e. a distribution or capital contribution, and no goodwill or bargain purchase gain is recognised in the acquirer's financial statements, nor is any gain or loss arising from the disposal recognised in the seller's share of the surplus or deficit.

2.8. Impairment of tangible and intangible assets, excluding goodwill

At each reporting date, the carrying amounts of the Company's tangible and intangible fixed assets are reviewed to determine whether there are any indicators that they may be impaired. If there is any indicator, the recoverable amount of the respective assets is estimated in order to determine the extent of the impairment loss (if any). When it is not possible to determine the recoverable amount of an individual asset, the recoverable amount of the cash-generating unit to which that asset belongs is estimated.

The recoverable amount of the asset or cash-generating unit is the higher of (i) the fair value less costs to sell and (ii) the value in use. In determining the value in use, the estimated future cash flows are discounted using a discount rate that reflects market expectations regarding the time value of money and the specific risks of the asset or cash-generating unit for which the estimates of future cash flows have not been adjusted.

Whenever the carrying amount of an asset or cash-generating unit exceeds its recoverable amount, an impairment loss is recognised. The impairment loss is recorded immediately in the income statement under "Depreciation, amortisation and impairment losses", unless the loss offsets a revaluation surplus recorded in equity.

The reversal of impairment losses recognised in previous years is recorded when there is evidence that the previously recognised impairment losses no longer exist or have decreased. The reversal of impairment losses is recognised in the income statement under the headings referred to in the previous paragraph. Impairment losses are reversed up to the amount that would have been recognised (net of amortisation) if the previous impairment loss had not been recognised.

2.9. Investments in subsidiaries and associates

Financial investments representing shares in group companies (companies in which the company has direct or indirect control, where control over an entity is considered to exist when the Group is exposed to or has the right, as a result of its involvement, to the variable return from the entity's activities, and has the ability to affect that return through the power exercised over the entity) are recognised at acquisition cost, in accordance with the provisions also laid down in IAS 27, as the company presents separate consolidated financial statements in accordance with IAS/IFRS.

This heading also records, at nominal value, the ancillary services granted to subsidiaries.

Investments in group companies are assessed when there are indications that the asset may be impaired or when impairment losses recognised in previous years no longer exist. In the latter case, the impairment loss is reversed up to the amount that would have been recognised if the impairment loss had not been recognised in previous periods.

Impairment losses detected in the realisable value of financial investments in group companies are recorded in the year in which they are estimated, against the item "Losses / (gains) in subsidiaries" in the income statement.

Impairment losses on investments in group companies are calculated using two methods, choosing the higher of the two: i. comparing the carrying amount of the investment with its recoverable amount, the latter being the higher of value in use and fair value less cost to sell; and ii. comparing the carrying amount of the investment with its fair value less cost to sell.

The identification of impairment indicators, the estimation of future cash flows and the determination of the fair value of assets less disposal costs, particularly in the case of impairment tests of subsidiaries in Angola (fair value less costs to sell including a discount/risk premium resulting from the uncertainties related to these companies), imply a high degree of judgement on the part of the Board of Directors with regard to the identification and assessment of the different impairment indicators and expected cash flows.

Costs incurred with the purchase of financial investments in group companies are recognised as an expense when incurred.

2.10. Financial assets

Financial assets are recognised in the Company's statement of financial position on the trade or contract date, which is the date on which the Company undertakes to acquire or dispose of the asset.

At inception, financial assets are recognised at fair value plus directly attributable transaction costs, except for assets at fair value through profit or loss where transaction costs are immediately recognised in profit or loss. Trade receivables are initially recognised at their transaction price, as defined by IFRS 15.

Financial assets are derecognised when:

(i) the Company's contractual rights to receive its cash flows expire;

(ii) the Company has transferred substantially all the risks and rewards associated with its ownership; or

(iii) although it retains part, but not substantially all, of the risks and rewards associated with their ownership, the Company has transferred control over the assets.

Financial assets and liabilities are offset and presented at net value when, and only when, the Company has the right to offset the recognised amounts and intends to settle on a net basis.

The company classifies its financial assets in the following categories: financial assets at fair value through profit or loss, financial assets measured at amortised cost, financial assets at fair value through other comprehensive income. Their classification depends on the entity's

business model for managing financial assets and the contractual characteristics in terms of the financial asset's cash flows.

Financial assets at fair value through profit or loss

This category includes derivative financial instruments and equity instruments that the company has not classified as a financial asset through other comprehensive income at the time of initial recognition. This category also includes all financial instruments whose contractual cash flows are not exclusively principal and interest.

Financial assets at fair value through profit or loss are presented in the statement of financial position at fair value, with net changes recognised in the income statement. This category of assets includes derivative instruments and investments in listed companies for which the Company has not adopted the classification as financial assets at fair value through other comprehensive income. Dividends from investments in listed companies are recognised as income in the income statement when the respective right to receive them is formalised.

Gains and losses resulting from changes in the fair value of assets measured at fair value through profit or loss are recognised in the income statement for the year in which they occur under the respective heading of "Losses / (gains) on financial assets", which includes the amounts of interest and dividend income.

Financial assets at fair value through other comprehensive income

Financial assets measured at fair value through other comprehensive income are those that are part of a business model whose objective is achieved through the collection of contractual cash flows and the sale of financial assets, and these contractual cash flows are only repayments of principal and interest payments on the outstanding principal.

Financial assets measured at amortised cost

Financial assets measured at amortised cost are those that are part of a business model whose objective is to hold financial assets in order to receive the contractual cash flows, these contractual cash flows being solely repayments of principal and interest payments on the outstanding principal.

Financial assets measured at amortised cost are subsequently measured using the effective tax rate method and subject to impairment. Income and expenses are recognised in the income statement when the asset is derecognised, updated, or impaired. The Company's financial assets measured at amortised cost include accounts receivable and loans granted to related parties.

Cash and cash equivalents

The amounts included under "Cash and cash equivalents" correspond to cash on hand, bank deposits, term deposits and other treasury applications with a maturity of less than three months and which can be mobilised immediately with an insignificant risk of change in value.

For the purposes of the cash flow statement, the heading "Cash and cash equivalents" also includes bank overdrafts included in the statement of financial position under the heading "Borrowings" (if applicable).

2.11. Financial liabilities and equity instruments

Financial liabilities and equity instruments are classified according to their contractual substance, regardless of their legal form. Equity instruments are contracts that show a residual interest in the company's assets after deducting liabilities. Equity instruments issued by the company are recognised at the amount received, net of the costs incurred with their issue. Financial liabilities are derecognised only when extinguished, i.e. when the obligation is settled, cancelled or expired.

According to IFRS 9, financial liabilities are classified as subsequently measured at amortised cost, except for:

- financial liabilities at fair value through profit or loss. These liabilities, including derivatives that are liabilities, must subsequently be measured at fair value;
- financial liabilities that arise when a transfer of a financial asset does not fulfil the conditions for derecognition or when the continuing involvement approach is applied;
- financial guarantee contracts;
- commitments to grant a loan at a lower interest rate than the market rate;
- contingent consideration recognised by an acquirer in a business combination to which IFRS 3 applies. This contingent consideration must subsequently be measured at fair value, with changes recognised in profit or loss.

The company's financial liabilities include borrowings, accounts payable and derivative financial instruments.

2.12. Impairment of financial assets

At each statement of financial position date, the Company analyses and recognises expected losses for its debt securities, loans, and receivables. Expected losses result from the difference between all the contractual cash flows that are due to an entity in accordance with the contract and all the cash flows that the entity expects to receive, discounted at the original effective interest rate.

The objective of this impairment policy is to recognise expected credit losses over the respective duration of financial instruments that have been subject to significant increases in credit risk since initial recognition, assessed on an individual or collective basis, considering all reasonable and sustainable information, including forward-looking information. If, at the reporting date, the credit risk associated with a financial instrument has not increased significantly since initial recognition, NOS SGPS measures the provision for losses relating to that financial instrument at an amount equivalent to the credit losses expected within 12 months.

For accounts receivable and assets resulting from contracts under IFRS 15, the Company adopts the simplified approach when calculating expected credit losses. As such, NOS SGPS does not monitor changes in credit risk, instead recognising impairment losses based on the expected credit loss at each reporting date. The company has established a matrix of provisions where it

presents a criterion for impairment losses that is based on the history of credit losses, adjusted by prospective factors specific to clients and the economic environment.

2.13. Derivative financial instruments

The Group applies the hedge accounting requirements of IFRS 9.

Initial and subsequent recognition

NOS SGPS uses derivative financial instruments, such as forward exchange rate contracts and interest rate swaps, to hedge its exchange rate and interest rate risks, respectively. Such derivative financial instruments are initially recognised at fair value on the date the derivative is contracted and are subsequently measured at fair value. Derivatives are recognised as assets when their fair value is positive and as liabilities when their fair value is negative.

In terms of hedge accounting, hedges are classified as:

- fair value hedging when the purpose is to hedge exposure to changes in the fair value of a recorded asset or liability or an unrecorded commitment;
- cash flow hedges when the purpose is to hedge exposure to the variability of cash flows arising from a specific risk associated with all or a component of a recorded asset or liability or a forecast transaction that is highly probable to occur or the exchange risk associated with an unrecorded commitment;
- hedging a net investment in a foreign operating unit.

NOS SGPS uses derivative financial instruments to hedge fair value and cash flows.

At the beginning of the hedging relationship, NOS SGPS formally designates and documents the hedging relationship for which it intends to apply hedge accounting as well as the management purpose and strategy of that hedge.

The documentation includes the identification of the hedging instrument, the hedged item or transaction, the nature of the risk being hedged and how NOS SGPS assesses whether the hedging relationship complies with the hedge accounting requirements (including its analysis of the sources of hedge ineffectiveness and how it determines the hedge rate). A hedging relationship qualifies for hedge accounting if it fulfils all the following hedge effectiveness requirements:

- there is an economic relationship between the hedged item and the hedging instrument;
- the effect of credit risk does not dominate the changes in value that result from this economic relationship; and
- the hedge ratio of the hedging relationship is the same as that which results from the quantity of the hedged item that an entity effectively hedges and the quantity of the hedging instrument that the entity effectively uses to hedge that quantity of the hedged item.

Hedging relationships that fulfil the above eligibility criteria are accounted for as follows:

Fair value hedging

The change in the fair value of the hedging instrument is recognised in the income statement. The change in the fair value of the hedged item attributable to the hedged risk is recognised as part of the carrying amount of the hedged item and is also recognised in the income statement.

For fair value hedges of items measured at amortised cost, any adjustment to the carrying amount is amortised to the income statement over the remaining period of the hedge using the effective interest method. Amortisation using the effective interest method begins when the adjustment is made and no later than when the hedged item ceases to be adjusted for the changes in fair value attributable to the risk being hedged.

If the hedged item is derecognised, the unamortised fair value is recorded immediately in the income statement.

When an unrecorded commitment is designated as a hedged item, subsequent cumulative changes in the fair value of the NOS SGPS commitment attributable to the hedged risk are recognised as an asset or liability and the corresponding gain or loss recorded in the income statement.

Cash flow hedging

The effective portion of the gain or loss on the hedging instrument is recognised in Other comprehensive income in the cash flow hedge reserve, while the ineffective portion is recognised immediately in the income statement. The cash flow hedge reserve is adjusted to the lower of the cumulative gain or loss on the hedging instrument and the cumulative change in the fair value of the hedged item.

NOS SGPS uses forward contracts for: i) exchange rates to hedge exposure to exchange rate risk on expected transactions and commitments assumed; and ii) interest rates to hedge interest rate fluctuation risk. The ineffective portion related to exchange rate contracts is recognised as "Exchange rate losses/(gains), net", and the ineffective portion related to interest rate contracts is recognised as "Financing costs".

The amounts accumulated in Other comprehensive income are accounted for according to the nature of the respective hedging relationship. If the hedging relationship subsequently results in the recording of a non-financial item, the accumulated amount is removed from the separate equity component and included in the initial cost or book value of the hedged asset or liability. This is not a reclassification adjustment and should not be recognised in Other comprehensive income for the period. This also applies when an expected hedged transaction of a non-financial asset or a non-financial liability becomes a commitment subject to hedge accounting.

For any other cash flow hedges, the amount accumulated in Other comprehensive income is reclassified to the income statement as a reclassification adjustment in the same period or periods during which the hedged cash flows affect the income statement.

If cash flow hedge accounting is discontinued, the amount accumulated in Other comprehensive income must remain if the hedged future cash flows are still expected to occur. Otherwise, the accumulated amount is reclassified immediately to the income statement as a reclassification adjustment. After discontinuation, as soon as the hedged cash flows occur, any

accumulated amount remaining in Other comprehensive income should be accounted for according to the nature of the underlying transaction as described above.

2.14. Grants

Grants are recognised at fair value when there is reasonable assurance that they will be received, and that NOS will comply with the conditions required for granting them.

Operating grants, namely for employee training, are recognised in the profit and loss account against the corresponding costs incurred.

Investment grants are deducted from tangible and intangible assets to the extent of the associated expenses, and are recognised in the income statement (depreciation, amortisation and impairment losses) on a systematic and rational basis over the useful life of the asset.

2.15. Provisions, contingent liabilities, and contingent assets

Provisions are recognised when: (i) there is a present obligation resulting from past events, and it is probable that the settlement of this obligation will require an outflow of internal resources; and (ii) the amount or value of this obligation is reasonably estimable. When one of the conditions described above is not met, the company discloses the events as contingent liabilities, unless the possibility of an outflow of funds resulting from the contingency is remote, in which case they are not disclosed.

Provisions for ongoing legal proceedings brought against the company are set up in accordance with risk assessments made by the company and its legal advisors, based on success rates.

Provisions for restructuring are only recognised when the Company has a detailed and formalised plan identifying the main features of the programme and after these facts have been communicated to the entities involved.

Present obligations arising from onerous contracts are recognised and measured as provisions. An onerous contract exists when the Company is an integral part of a contract, the fulfilment of which has costs directly associated with the contract (both incremental costs and an allocation of costs directly related to the contract) that exceed the future economic benefits.

No provisions are recognised for future operating losses.

Contingent liabilities are not recognised in the financial statements, except as provided for in IFRS 3 in the context of business combinations and are disclosed whenever the possibility of an outflow of resources involving economic benefits is not remote. Contingent assets are not recognised in the financial statements but are disclosed when it is probable that there will be a future economic inflow of resources.

Provisions are reviewed and updated on the statement of financial position date to reflect the best estimate at that time of the obligation in question.

2.16. Rights of use and leases

A lease is defined as a contract, or part of a contract, that transfers the right to use an asset (the underlying asset), for a period, in exchange for value.

At the beginning of each contract, it is assessed and identified whether it is or contains a lease. This assessment involves an exercise of judgement as to whether each contract depends on a specific asset, whether the NOS obtains substantially all the economic benefits from the use of that asset and whether the NOS has the right to control the use of the asset.

All contracts that constitute a lease are accounted for based on a single on-balance model similar to the treatment that IAS 17 establishes for finance leases.

On the lease commencement date, NOS recognises the liability related to the lease payments (i.e. the lease liability) and the asset representing the right to use the underlying asset during the lease period (i.e. the right-of-use or "ROU").

The interest cost on the lease liability and the depreciation of the ROU are recognised separately.

The lease liability is remeasured when certain events occur (such as a change in the lease period, a change in future payments resulting from a change in the reference index or the rate used to determine those payments). This remeasurement of the lease liability is recognised as an adjustment to the ROU.

The estimated costs of dismantling, removing assets and restoring the site related to leases are recognised in tangible fixed assets together with the works performed.

NOS SGPS does not apply the practical expedient provided for leases of less than one year.

2.16.1. Rights to use assets

The Company recognises the right to use the assets on the lease start date (i.e. the date on which the underlying asset is available for use).

The right to use the assets is recognised at acquisition cost, less accumulated depreciation and impairment losses and adjusted for any new measurements of the lease liability. The cost of the right to use the assets includes the recognised value of the lease liability, any direct costs initially incurred, and payments already made before the initial lease date, less any incentives received. When IFRS 16 was implemented, any adjustments arising from dismantling costs were not considered in the process of calculating the value of rights of use, as these had already been previously capitalised as tangible fixed assets.

Unless it is reasonably certain that the Company will obtain ownership of the leased asset at the end of the lease term, the right to use the assets recognised is depreciated using the straight-line method over the shorter of its estimated useful life and the lease term.

Rights of use are subject to impairment.

The rights of use of assets are depreciated on a straight-line basis over the shorter of the contractual term and the expected useful life of the asset.

If the lease asset is transferred to the Company at the end of the contract, or the cost reflects the possibility of exercising the purchase option, depreciation is calculated according to the asset's estimated useful life.

2.16.2. Lease liabilities

On the lease commencement date, the Company recognises liabilities measured at the present value of future payments to be made until the end of the lease contract.

Lease payments include fixed payments (including fixed payments in substance), less any incentives receivable, variable payments, dependent on an index or a rate, and amounts expected to be paid under residual value guarantees. Lease payments also include the exercise price of a purchase option, if it is reasonably certain that the Company will exercise the option, and penalty payments for the termination of the contract, if it is reasonably certain that the Group will terminate the contract.

Variable payments that do not depend on an index or a rate are recognised as an expense in the period in which the event giving rise to them occurs.

When calculating the present value of lease payments, the Company uses the incremental borrowing rate on the lease start date if the implicit interest rate is not easily determinable.

After the start date of the lease, the value of the lease liability increases to reflect the increase in interest and decreases due to the payments made. In addition, the carrying amount of the lease liability is remeasured if there is a change, such as a change in the lease term, in the fixed payments or in the decision to purchase the underlying asset.

2.17. Income tax

NOS is covered by the special taxation regime for groups of companies, which covers all companies in which it holds, directly or indirectly, at least 75% of the share capital and which are simultaneously resident in Portugal and subject to Corporate Income Tax (IRC).

The remaining subsidiaries, which are not covered by the special taxation regime for groups of companies, are taxed individually, based on their respective tax bases and the applicable tax rates.

Income tax is recognised in accordance with IAS 12. When measuring the cost of income tax for the period, in addition to current tax, the effect of deferred tax is also taken into account, calculated using the balance sheet method, taking into account temporary differences resulting from the difference between the tax base of assets and liabilities and their values in the financial statements, as well as tax losses carried forward existing at the date of the statement of financial position. Deferred tax assets and liabilities were calculated based on tax legislation currently in force, or legislation already published for future application.

Deferred tax assets are recognised for all deductible temporary differences to the extent that it is probable that taxable profit will be available against which the deductible temporary difference can be used, unless the deferred tax asset results from the initial recognition of an asset or liability in a transaction that:

- is not a concentration of business activities;
- at the time of the transaction, does not affect accounting profit or taxable profit (tax loss);

- with regard to deductible temporary differences arising from investments in subsidiaries, branches and associates and interests in joint arrangements, deferred tax assets are recognised only to the extent that the temporary difference will reverse in the foreseeable future and taxable profit will be available against which the temporary difference can be utilised.

As established in this standard, deferred tax assets are only recognised when there is reasonable certainty that they will be used to reduce future taxable income, or when there are deferred tax liabilities whose reversal is expected in the same period in which the deferred tax assets are reversed. These deferred tax assets are valued at the end of each period and adjusted according to their expected future use.

The amount of tax to be included in either current or deferred tax, which results from transactions or events recognised under equity headings, is recorded directly under these same headings, and does not affect the result for the year.

In a business combination, the deferred tax benefits acquired are recognised as follows:

- acquired deferred tax benefits that are recognised in the measurement period of one year after the date of the combination and that result from new information about facts and circumstances that existed at the acquisition date are applied to reduce the carrying amount of any goodwill related to that acquisition. If the carrying amount of that goodwill is zero, any remaining deferred tax benefits are recognised in the income statement.

- all other deferred tax benefits acquired that are realised are recognised in the income statement (or, if applicable, directly in equity).

Estimates to deal with uncertainties regarding the acceptance of a given tax treatment by the tax authorities are recognised as deferred tax liabilities.

Pillar II

Portugal transposed Directive (EU) 2022/2523, of 15 December 2022, into national law by means of Law 41/2024, of 8 November ("the Law"), which introduced a worldwide minimum level of taxation for multinational company groups and large national groups into the Portuguese legal system, commonly known as "Pillar II".

Considering the rules approved in the Law and the best information available now, NOS has performed an assessment of the possible impacts of Pillar II for the NOS Group, estimating that the group will benefit from the supplementary tax exclusion in the initial phase of international activity, provided for in Article 44 of the Law, under the transitional regime, applicable for a period of 5 years (2024-2028).

2.18. Share-based payment

Benefits granted to employees under share incentive plans or share options are recognised in accordance with the provisions of IFRS 2 - Share-based payments.

In accordance with IFRS 2, since it is not possible to reliably estimate the fair value of services received from employees, their value is measured by reference to the fair value of equity instruments (treasury shares), according to their price on the date of attribution.

This cost is recognised on a straight-line basis over the period in which the service is provided by the employees, under Personnel costs in the income statement, together with the corresponding increase in Other reserves in equity.

The accumulated cost recognised at the date of each financial statement until vesting reflects NOS SGPS's best estimate of the number of own shares that will be vested, weighted by the proportional time elapsed between the award and vesting. The impact on the income statement for each year represents the variation in the accumulated cost between the beginning and the end of the year.

In turn, benefits granted based on shares but settled in cash lead to the recognition of a liability valued at fair value on the statement of financial position date.

In addition, the Board of Directors of NOS SGPS, which is responsible for allocating the plans, may decide on an additional charge relating to costs associated with managing the plans, which is charged to the subsidiaries and recognised in equity.

2.19. Capital

Legal reserve

Portuguese commercial legislation establishes that at least 5% of the annual net profit must be set aside to reinforce the legal reserve, until it represents at least 20% of the share capital. This reserve is not distributable, except in the event of liquidation, but it can be used to absorb losses, after all other reserves have been exhausted, and for incorporation into the capital.

Share premium reserves

Share premiums correspond to premiums obtained from the issue or capital increases. In accordance with Portuguese commercial legislation, the amounts included under this heading follow the regime established for the "Legal Reserve", i.e. the amounts are not distributable, except in the event of liquidation, but can be used to absorb losses, after all other reserves have been exhausted, and for incorporation into capital.

Reserves for medium-term incentive plans

In accordance with IFRS 2 - "Share-based payments", the liability for medium-term incentive plans settled through the delivery of own shares is recognised as a credit under the heading "Reserves for medium-term incentive plans", and this reserve cannot be distributed or used to absorb losses.

The Company recognises in equity the liability for all the share plans of the several companies in the NOS Group, since it is responsible for delivering them to its employees, against the results for the year and accounts receivable from subsidiaries when they are its own employees or employees of subsidiary companies, respectively.

Hedging reserves

Hedging reserves reflect changes in the fair value of cash flow hedging derivative financial instruments that are considered to be effective and cannot be distributed or used to absorb losses.

Reserves for own shares

Reserves for own shares reflect the value of own shares acquired and follow a legal regime equivalent to that of the legal reserve. Under Portuguese law, the amount of distributable reserves is determined in accordance with the company's individual financial statements, presented in accordance with IFRS. In addition, the increases resulting from the application of fair value through equity components, including those from their application through the net profit for the year, can only be distributed when the elements that gave rise to them are sold, exercised, liquidated or when they cease to be used, in the case of tangible or intangible assets.

Own shares

Own shares are recognised at their acquisition value as a deduction from equity. Gains or losses inherent in the sale of own shares are recorded under "Other reserves".

Dividends

The company recognises the liability, and the respective impact on equity, associated with the responsibility to distribute dividends when it is approved by the shareholders.

Retained earnings

This item includes realised profits available for distribution to shareholders and gains from increases in the fair value of financial instruments, financial investments, and investment properties, which, in accordance with Article 32(2) of the CSC, will only be available for distribution when the items or rights that gave rise to them are sold, exercised, extinguished or liquidated.

2.20. Revenue

The Company's revenue is based on the five-step model established by IFRS 15:

- identification of the contract with the client;
- identification of performance obligations;
- determining the transaction price;
- allocation of the transaction price to performance obligations; and
- revenue recognition.

Therefore, at the beginning of each contract, the Company evaluates the promised goods or services and identifies, as a performance obligation, each promise to transfer to the customer any distinct good or service (or a package of goods or services). These promises in contracts

with customers can be explicit or implicit, provided that such promises create a valid expectation in the customer that the entity will transfer a good or service to the customer, based on published policies, specific statements, or customary business practices of the entity.

The Company only provides services and revenue is recognised when each performance obligation is fulfilled.

Interest revenue is recognised using the effective interest method, if it is probable that economic benefits will flow to the Company and its amount can be measured reliably.

Revenue from dividends is recognised when the company's right to receive the corresponding amount has been established.

2.21. Accruals

The company's income and expenses are recognised on an accrual's basis, whereby they are recognised as they are generated or incurred, regardless of when they are received or paid.

The "Accounts receivable", "Deferred costs", "Accrued costs" and "Deferred income" headings include costs and income attributable to the current financial year and whose expenses and income will only occur in future financial years, as well as expenses and income that have already occurred but relate to future financial years and which will be charged to the results of each of those financial years, for the amount corresponding to them.

Costs attributable to the current financial year and whose expenditure will only be incurred in future financial years are estimated and recorded under "Accrued costs", whenever it is possible to estimate the amount with great reliability, as well as when the expense will be incurred. If there is uncertainty about either the date of the outflow of resources or the amount of the obligation, the value is classified as Provisions.

2.22. Financial charges on loans

Borrowing costs are recognised as an expense on an accrual's basis, except in the case of loans incurred (whether generic or specific) in the acquisition, construction or production of an asset that will take a substantial period of time (more than one year) to be in the desired condition, which are capitalised in the acquisition cost of that asset. Capitalised borrowing costs are determined considering the amount of borrowing costs eligible for capitalisation, by applying a capitalisation rate to the expenditure relating to that asset. The capitalisation rate (in line with NOS' average financing rate) and the costs to be capitalised are determined monthly, considering the monthly balance of eligible loans and the monthly amount of the qualifying asset in progress.

2.23. Measurement at fair value

The company measures part of its financial assets, such as available-for-sale and trading financial assets, and part of its non-financial assets, at fair value on the reference date of the financial statements.

Fair value measurement assumes that the asset or liability is exchanged in an orderly transaction between market participants to sell the asset or transfer the liability, on the

measurement date, under current market conditions. Fair value measurement is based on the assumption that the transaction to sell the asset or transfer the liability can occur:

- on the main market for assets and liabilities, or
- in the absence of a main market, the transaction is assumed to take place in the most advantageous market. This is the one that maximises the amount that would be received on the sale of the asset or minimises the amount that would be paid to transfer the liability, after considering transaction costs and transport costs.

Because different entities and different businesses within a single entity may have access to different markets, the main or most advantageous market for the same asset or liability may vary from one entity to another, or even between businesses within the same entity, but it is assumed that they are accessible to the Company.

The measurement of fair value uses assumptions that market participants would use in setting the price of the asset or liability, assuming that market participants would use the asset in such a way as to maximise its value and use.

The Company uses valuation techniques appropriate to the circumstances and for which there is sufficient data to measure fair value, maximising the use of relevant observable data and minimising the use of unobservable data.

All assets and liabilities measured at fair value or for which disclosure is mandatory are classified according to a fair value hierarchy, which categorises the data to be used in fair value measurement into three levels, detailed below:

- Level 1 - Unadjusted quoted market prices in active markets for identical assets or liabilities that the entity can access at the measurement date;
- Level 2 - Valuation techniques that use inputs that are not quoted but are directly or indirectly observable;
- Level 3 - Valuation techniques that use inputs not based on observable market data, i.e. based on unobservable data.

Fair value measurement is classified entirely at the lowest level of input that is significant to the measurement as a whole.

2.24. Employee benefits

Personnel costs are recognised when the service is provided by employees, regardless of when they are paid. Here are some specifics regarding each of the benefits:

Termination of employment. Termination benefits are due for payment when employment ceases before the normal retirement date or when an employee voluntarily agrees to leave in exchange for these benefits. The Company recognises these benefits when it can be demonstrated that it is committed to the termination of employment of current employees, in accordance with a detailed formal plan for termination and there is no realistic possibility of withdrawal, or these benefits are granted to encourage voluntary departure. Whenever

termination benefits fall due more than 12 months after the balance sheet date, they are discounted to their present value.

Holidays, holiday pay and bonuses. In accordance with labour law, employees are entitled to 22 working days of annual leave, as well as one month's holiday allowance, rights acquired in the year prior to their payment. These company liabilities are recorded when incurred, regardless of when they are paid, and are reflected under "Accounts payable and other".

Labour Compensation Fund (FCT) and the Labour Compensation Guarantee Fund (FGCT). With the publication of Law no. 70/2013 and subsequent regulation by Ministerial Order 294-A/2013, the Labour Compensation Fund (FCT) and the Labour Compensation Guarantee Fund (FGCT) came into force on 1 October. In this context, companies that hire a new employee are obliged to deduct a percentage of their salary from these two new funds (0.925% for the FCT and 0.075% for the FGCT), with the aim of ensuring partial payment of compensation in the event of redundancy. Considering the characteristics of each Fund, the following was considered:

- monthly contributions to the FGCT made by the employer are recognised as an expense in the period to which they relate;

- the monthly contributions to the FCT made by the employer are recognised as a financial asset of that entity, measured at fair value, with the respective changes recognised in the income statement.

With the publication of Law 13/2023, as of 1 May 2023, it is no longer compulsory to make payments corresponding to 0.925% of each worker's basic salary and seniority to the FCT, which has been converted into a closed accounting fund.

According to the same law, the obligations relating to the FGCT corresponding to 0.075% are suspended for the duration of the Medium-Term Agreement for improving incomes, wages and competitiveness, which is expected to run until 2026.

2.25. Cash flow statement

The cash flow statement is prepared using the direct method. The company classifies assets with a maturity of less than three months and for which the risk of a change in value is insignificant under cash and cash equivalents. For the purposes of the cash flow statement, cash and cash equivalents also include bank overdrafts, which are included in the statement of financial position under "Borrowings".

The cash flow statement is categorised into operating, investing, and financing activities.

Operating activities include receipts from customers and payments to suppliers, staff and others related to operating activities.

The cash flows covered by investing activities include acquisitions and disposals of investments in subsidiaries and receipts and payments arising from the purchase and sale of intangible assets and property, plant and equipment, among others.

Financing activities include payments and receipts relating to borrowings, interest payments and similar costs, leasing contracts, the purchase and sale of own shares and the payment of dividends.

2.26. Subsequent events

Events occurring after the date of the statement of financial position that provide additional information on conditions that existed at that date are considered in the preparation of the financial statements for the period.

Events occurring after the date of the statement of financial position that provide information on conditions occurring after that date are disclosed in the notes to the financial statements if they are materially relevant.

3. Main estimates and judgements

The preparation of financial statements requires the Company's management to make judgements and estimates that affect the statement of financial position and the reported results. These estimates are based on the best information and knowledge of past and/or present events and the actions that the company believes it may take in the future. However, on the date operations are realised, their results may differ from these estimates.

Changes to these estimates that occur after the date of approval of the financial statements will be corrected prospectively in the results, in accordance with IAS 8 - "Accounting policies, changes in accounting estimates and errors".

The estimates and assumptions that present the greatest risk of giving rise to a material adjustment in assets and liabilities are presented below:

3.1 Relevant accounting estimates

3.1.1 Provisions

The Company periodically analyses any obligations resulting from past events that should be recognised or disclosed. The subjectivity inherent in determining the probability and amount of internal resources needed to pay the obligations could lead to significant adjustments, either due to changes in the assumptions used or the future recognition of provisions previously disclosed as contingent liabilities.

3.1.2 Impairment of assets excluding goodwill

The determination of a possible impairment loss can be triggered by the occurrence of several events, many of which are outside the company's sphere of influence, such as: the future availability of financing, the cost of capital, as well as any other changes, whether internal or external to the Company.

The identification of impairment indicators, the estimation of future cash flows and the determination of the fair value of assets less disposal costs, particularly in the case of impairment tests of subsidiaries in Angola (fair value less costs to sell including a discount/risk premium resulting from the uncertainties related to these companies), imply a high degree of judgement on the part of the Board of Directors with regard to the identification and assessment of the different impairment indicators and expected cash flows.

3.1.3 Impairment of goodwill

Goodwill is subject to annual impairment tests or whenever there are indications of a possible loss in value. The recoverable amounts of the cash-generating units to which goodwill is attributed are determined based on value-in-use calculations. These calculations require the use of estimates by management.

3.1.4 Fair value of financial assets and liabilities

When determining the fair value of a financial asset or liability, if there is an active market, the market price is applied. If there is no active market, which is the case for some of the company's financial assets and liabilities, valuation techniques generally accepted in the market are used, based on market assumptions.

The company uses valuation techniques for unlisted financial instruments, such as derivatives. The most frequently used valuation models are discounted cash flow models and option models, which incorporate, for example, interest rate curves and market volatility.

For some types of more complex derivatives, more advanced valuation models are used, containing assumptions and data that are not directly observable in the market, for which the company uses internal estimates and assumptions.

3.2 Errors, estimates and changes in accounting policies

During the years ended 31 December 2023 and 2024, no material errors, estimates or changes in accounting policies relating to previous years were recognised. As at 31 December 2024, estimates were reclassified to deal with uncertainties regarding the acceptance of a certain tax treatment by the Tax Authorities, from deferred tax liabilities to non-current taxes payable, in the amount of approximately Euro 1,358 thousand (31 December 2023: Euro 1,316 thousand), with restatement of the year ended 31 December 2023, for comparability purposes (Note 11).

4. Risk management

4.1. No financial risk

NOS, as a holding company (SGPS), directly and indirectly performs management activities on its subsidiaries. Therefore, the fulfilment of its obligations depends on the cash flows generated by these subsidiaries. The company thus depends on the possible distribution of dividends by its subsidiaries, the payment of interest, the repayment of loans and other cash flows generated by these companies.

The ability of NOS subsidiaries to make funds available to the holding company will depend, in part, on their ability to generate positive cash flows and, on the other hand, is dependent on their results, available reserves and financial structure.

NOS has a risk management programme that focuses its analysis on the financial markets with a view to minimising potential adverse effects on its financial performance. Risk management is conducted by the Finance Department in accordance with the policy approved by the Board of Directors. The NOS also has an Internal Control Committee with specific functions in the area of risk control of the company's activity.

4.2. Exchange rate risk

The exchange rate risk is essentially related to the exposure arising from payments made to foreign suppliers denominated mainly in US dollars. Considering the balance of accounts payable resulting from transactions denominated in a currency other than the Company's functional currency, NOS subsidiaries contract or may contract financial instruments, namely short-term currency forwards in order to hedge the risk associated with these balances.

Complementary disclosures are made in the NOS consolidated financial statements.

As at 31 December 2023 and 2024, the balances payable to suppliers in currencies other than the Euro are immaterial.

4.3. Interest rate risk

The risk of interest rate fluctuations can translate into a cash flow risk or a fair value risk, depending on whether variable or fixed interest rates have been negotiated.

NOS follows a policy of hedging risk by contracting interest rate swaps to cover future interest payments on commercial paper issues and loans.

NOS uses the technique of sensitivity analysis, which measures the estimated impacts on results and capital of an immediate increase or decrease of 0.25% (25 basis points) in market interest rates, compared to the rates applied on the date of the balance sheet statement for each class of financial instrument, keeping all other variables constant. This analysis is for illustrative purposes only, as in practice market rates rarely change in isolation.

The sensitivity analysis is based on the following assumptions:

- changes in market interest rates affect interest income or expense on variable financial instruments;
- changes in market interest rates only affect interest income or expense in relation to financial instruments with fixed interest rates if they are recognised at fair value;
- changes in market interest rates affect the fair value of derivative financial instruments and other financial assets and liabilities;
- changes in the fair value of derivative financial instruments and other financial assets and liabilities are estimated by discounting future cash flows from net present values, using year-end market rates.

Under these assumptions, a 0.25% increase or decrease in market interest rates for unhedged or variable rate loans on 31 December 2024 would result in an increase or decrease in annual pre-tax profit of approximately Euro 1.4 million and Euro 1.8 million respectively (2023: Euro 1.7 million and Euro 1.8 million).

Regarding contracted interest rate swaps, the sensitivity analysis, which measures the estimated impact of an immediate increase or decrease of 0.25% (25 basis points) in market interest rates, results in variations compared to the current fair value of the instruments of more

than Euro 49 thousand (2023: approximately Euro 79 thousand more) and Euro 44 thousand less (2023: approximately Euro 69 thousand less).

Complementary disclosures are made in the NOS consolidated financial statements.

4.4. Credit rate risk

Credit risk is essentially related to the risk of a counterparty failing in its contractual obligations, resulting in a financial loss for NOS subsidiaries. NOS subsidiaries are subject to credit risk in their operating and treasury activities.

This risk is monitored on a regular business basis, and management's aim is to: i) limit the credit granted to customers, considering the average term of receivables from each customer; ii) monitor the evolution of the level of credit granted; and iii) perform impairment analyses on receivables on a regular basis.

NOS subsidiaries do not present any significant credit risk with any particular customer, as the accounts receivable derive from a large number of customers spread across several businesses and the subsidiaries obtain credit guarantees whenever the customer's financial situation so requires.

Complementary disclosures are made in the NOS consolidated financial statements.

4.5. Liquidity risk

Prudent liquidity risk management implies maintaining an adequate level of cash and cash equivalents in order to fulfil the responsibilities assumed, associated with the negotiation of credit lines with financial institutions. Under the model adopted, NOS has:

b.1) Commercial paper programmes used of 518.5 million euros, of which 39.5 million euros issued under programmes without underwriting. The total amount contracted under underwriting programmes is 875 million euros, corresponding to sixteen programmes with six banking institutions, 775 million euros of which bear interest at market rates and 100 million euros are issued at fixed rates.

b.2) Bonds by private and direct offer in the amount of 400 million euros.

Based on the estimated cash flows, and taking into account compliance with any covenants normally existing in loans payable, management regularly monitors the Group's liquidity reserve forecasts, including the amounts of unused credit lines, cash and cash equivalents.

Complementary disclosures are made in the NOS consolidated financial statements.

4.6. Capital risk management

As at 31 December 2024, NOS holds financial assets and liabilities valued at fair value, namely interest rate derivatives (Note 21).

The levels of the fair value hierarchy, as set out in IFRS 13 - Fair value measurement, are defined as follows:

- Level 1 - Financial instruments valued on the basis of quotes from active markets to which the company has access. This category includes securities valued on the basis of executable prices (with immediate liquidity) published by external sources.
- Level 2 - Financial instruments whose valuation is based on observable data, directly or indirectly, in active markets. This category includes securities valued on the basis of bids provided by external counterparties and internal valuation techniques that exclusively use observable market data.
- Level 3 - All financial instruments valued at fair value that do not fall into levels 1 and 2.

The calculations of the fair value of the swaps were based on estimated discounted future *cash flows* (Level 2).

Complementary disclosures are made in the NOS consolidated financial statements.

5. Financial assets and liabilities classified according to IFRS 9 categories - financial instruments

The accounting policies set out in IFRS 9 for financial instruments have been applied to the following items:

	31-12-2023					
	Financial assets	**Financial derivatives**	**Financial liabilities**	**Total financial assets/liabilities**	**Non-financial non-financial liabilities**	**Total**
Assets						
Accounts receivable - non-current (Note 10)	98,945,000	-	-	98,945,000	-	98,945,000
Available-for-sale assets (Note 12)	12,950	-	-	12,950	-	12,950
Accounts receivable - current (Note 10)	109,919,641	-	-	109,919,641	4,083	109,923,724
Derivative financial instruments (Note 21)	-	5,386,308	-	5,386,308	-	5,386,308
Cash and cash equivalents (Note 15)	11,187,505	-	-	11,187,505	-	11,187,505
Total financial assets	**220,065,096**	**5,386,308**	**-**	**225,451,404**	**4,083**	**225,455,487**
Liabilities						
Borrowings - non-current (Note 17)		-	949,869,950	949,869,950	-	949,869,950
Accrued costs - non-current (Note 19)	-	-	454,886	454,886	-	454,886
Borrowings - current (Note 17)	-	-	148,107,877	148,107,877	-	148,107,877
Accounts payable - current (Note 22)	-	-	251,035,796	251,035,796	-	251,035,796
Accrued costs - current (Note 19)	-	-	2,421,201	2,421,201	-	2,421,201
Derivative financial instruments (Note 21)	-	1,035,978	-	1,035,978	-	1,035,978
Total financial liabilities	**-**	**1,035,978**	**1,351,889,710**	**1,352,925,688**	**-**	**1,352,925,688**

31-12-2024						
	Financial assets	Financial derivatives	Financial liabilities	Total financial assets/liabilities	Non-financial non-financial liabilities	Total
Assets						
Accounts receivable - non-current (Note 10)	375,826,500	-	-	375,826,500	-	375,826,500
Available-for-sale assets (Note 12)	12,950	-	-	12,950	-	12,950
Accounts receivable - current (Note 10)	97,898,131	-	-	97,898,131	203,177	98,101,308
Derivative financial instruments (Note 21)	-	2,457,084	-	2,457,084	-	2,457,084
Cash and cash equivalents (Note 15)	5,289,149	-	-	5,289,149	-	5,289,149
Total financial assets	**479,026,730**	**2,457,084**	**-**	**481,483,814**	**203,177**	**481,686,991**
Liabilities						
Borrowings - non-current (Note 17)	-	-	757,691,291	757,691,291	-	757,691,291
Accrued costs - non-current (Note 19)	-	-	454,887	454,887	-	454,887
Borrowings - current (Note 17)	-	-	163,790,007	163,790,007	-	163,790,007
Accounts payable - current (Note 22)	-	-	362,764,068	362,764,068	-	362,764,068
Accrued costs - current (Note 19)	-	-	2,580,484	2,580,484	-	2,580,484
Derivative financial instruments (Note 21)	-	183,515	-	183,515	-	183,515
Total financial liabilities	**-**	**183,515**	**1,287,280,737**	**1,287,464,252**	**-**	**1,287,464,252**

Given their nature, the balances of taxes recoverable and taxes payable were considered to be financial instruments not covered by IFRS 7. Similarly, the deferred costs and deferred income items were not considered in this breakdown as they are made up of balances not covered by IFRS 7.

The Company's Board of Directors believes that the fair value of the classes of financial instruments recorded at amortised cost and those recorded at the present value of payments does not differ significantly from their book value, given the contractual conditions of each of these financial instruments.

The company's activity is exposed to a variety of financial risks, such as market risk, credit risk and liquidity risk, as well as economic and legal risks, which are described in Note 4.

6. Tangible fixed assets

During the years ended 31 December 2023 and 2024, the movements in the acquisition cost, accumulated depreciation and impairment losses under this heading were as follows:

	31-12-2022	Increases	Disposals and write-offs	Transfers and others	31-12-2023
Cost of acquisition					
Buildings and other constructions	253,332	-	-	-	253,332
Basic equipment	227,450	-	-	-	227,450
Tools and utensils	7,965	-	-	-	7,965
Administrative equipment	2,439,230	4,883	-	-	2,444,113
Other tangible assets	293,590	-	-	-	293,590
	3,221,567	**4,883**	**-**	**-**	**3,226,450**
Accumulated depreciation and impairment losses					
Buildings and other constructions	253,332	-	-	-	253,332
Basic equipment	227,315	95	-	-	227,410
Tools and utensils	7,965	-	-	-	7,965
Administrative equipment	2,430,890	7,663	-	-	2,438,553
Other tangible fixed assets	152,048	-	-	-	152,048
	3,071,550	**7,758**	**-**	**-**	**3,079,308**
	150,017	**(2,875)**	**-**	**-**	**147,142**

	31-12-2023	Increases	Disposals and write-offs	Transfers and others	31-12-2024
Cost of acquisition					
Buildings and other constructions	253,332	-	-	-	253,332
Basic equipment	227,450	-	-	-	227,450
Tools and utensils	7,965	-	-	-	7,965
Administrative equipment	2,444,113	3,688	-	-	2,447,801
Other tangible assets	293,590	-	-	-	293,590
	3,226,450	**3,688**	**-**	**-**	**3,230,138**
Accumulated depreciation and impairment losses					
Buildings and other constructions	253,332	-	-	-	253,332
Basic equipment	227,410	40	-	-	227,450
Tools and utensils	7,965	-	-	-	7,965
Administrative equipment	2,438,553	5,075	-	-	2,443,628
Other tangible fixed assets	152,048	-	-	-	152,048
	3,079,308	**5,115**	**-**	**-**	**3,084,423**
	147,142	**(1,427)**	**-**	**-**	**145,715**

7. Intangible assets

During the years ended 31 December 2023 and 2024, the movements in the acquisition cost, accumulated depreciation and impairment losses of this item were as follows:

	31-12-2022	Increases	Disposals and write-offs	31-12-2023
Cost of acquisition	-			-
Industrial property and other rights	5,538,531	-	-	5,538,531
Goodwill	453,888,879	-	-	453,888,879
Computer programmes	461,345	-	-	461,345
	459,888,755	**-**	**-**	**459,888,755**
Accumulated amortisation and impairment losses				
Industrial property and other rights	5,538,529	-	-	5,538,529
Computer programmes	461,345	-	-	461,345
	5,999,874	**-**	**-**	**5,999,874**
	453,888,881	**-**	**-**	**453,888,881**

	31-12-2023	Increases	Disposals and write-offs	31-12-2024
Cost of acquisition				-
Industrial property and other rights	5,538,531	-	-	5,538,531
Goodwill	453,888,879	-	-	453,888,879
Computer programmes	461,345	-	-	461,345
	459,888,755	**-**	**-**	**459,888,755**
Accumulated amortisation and impairment losses				
Industrial property and other rights	5,538,529	-	-	5,538,529
Computer programmes	461,345	-	-	461,345
	5,999,874	**-**	**-**	**5,999,874**
	453,888,881	**-**	**-**	**453,888,881**

Goodwill

On 31 December 2023 and 2024, goodwill results from the merger operation that took place on 27 August 2013, by incorporation of Optimus SGPS into ZON, through the global transfer of the assets of Optimus SGPS to ZON.

Goodwill impairment test

In 2024, impairment tests were carried out based on valuations using the discounted cash flow method, which support the recoverability of the carrying amount of goodwill. International accounting standards state that an asset cannot be recognised at an amount greater than its recoverable amount through use (present value of future cash flows) or sale. An asset is impaired when its book value exceeds its recoverable amount. This analysis should be carried out by cash-generating unit. The values of these evaluations are supported by historical performance and expectations of the development of the business and the respective markets, embodied in approved medium/long-term plans.

The following assumptions were made in these estimates:

	Telco segment	Audiovisual segment	
		NOS Audiovisuais	NOS Cinemas
Discount rate (before tax)	6.0%	7.2%	8.3%
Evaluation period	5 years	5 years	5 years
EBITDA growth (2025-29)*	(3.7%)	(3.4%)	4.3%
Perpetuity growth rate	2.0%	2.0%	2.0%

* EBITDA = Operating Profit + Depreciation, Amortisation and Impairment Losses + Restructuring Costs + Losses/(Gains) on asset disposals + Other Non-Recurring Costs/(Gains) (CAGR - 5-year average)

In the telecommunications segment, the assumptions used are based on past performance, the evolution of the number of customers, the foreseeable evolution of regulated tariffs, current market conditions and expectations of future development.

In the cinema segment, the segment most affected by COVID-19, EBITDA growth is still justified by the prospect of activity recovering to near pre-pandemic levels.

The number of explicit years adopted in the impairment tests results from the degree of maturity of the respective businesses and market, and were determined on the basis of what was considered most appropriate for the valuation of each cash flow generating unit.

Sensitivity analyses were carried out to changes in the discount rate and perpetuity growth rate of the various segments reported, of 1 percentage point and 0.4 percentage points respectively.

In the telecommunications segment, sensitivity analyses were also carried out on variations in the operating variables RGU (Revenue Generating Unit), ARPU (Average Revenue Per User), EBITDA and CAPEX, in perpetuity, of approximately 5%.

In the audiovisual segment, sensitivity analyses were carried out to variations in the projected number of views, average revenue per view, EBITDA and CAPEX, in perpetuity, of approximately 5%.

In the cinema segment, sensitivity analyses were carried out to changes in the projected number of tickets sold, average revenue per ticket, EBITDA and CAPEX, in perpetuity, of approximately 5%.

These simulations did not result in the need to reinforce impairment.

8. Rights of use

During the years ended 31 December 2023 and 2024, the movements under this heading were as follows:

	31-12-2022	Increases	Others	31-12-2023
Cost of acquisition				
Buildings	89,266	-	-	89,266
Vehicles	976,895	41,208	-	1,018,103
	1,066,161	**41,208**	**-**	**1,107,369**
Accumulated amortisation and impairment losses				
Buildings	76,547	11,741	-	88,288
Vehicles	815,303	101,774	-	917,077
	891,850	**113,515**	**-**	**1,005,365**
	174,311	**(72,307)**	**-**	**102,004**

	31-12-2023	Increases	Others	31-12-2024
Cost of acquisition				
Buildings	89,266	66,226	-	155,492
Vehicles	1,018,103	181,308	-	1,199,411
	1,107,369	**247,534**	**-**	**1,354,903**
Accumulated amortisation and impairment losses				
Buildings	88,288	21,378	-	109,666
Vehicles	917,077	105,646	-	1,022,723
	1,005,365	**127,024**	**-**	**1,132,389**
	102,004	**120,510**	**-**	**222,514**

These assets are amortised according to the duration of the respective contract.

9. Investments in subsidiaries and associates

As at 31 December 2023 and 2024, this item is broken down as follows:

	Equity holdings	Ancillary services	2023	Equity holdings	Ancillary services	2024
NOS Comunicações	1,496,761,600	-	1,496,761,600	1,496,761,600	-	1,496,761,600
NOS Audio - Sales and Distribution	124,711,200	-	124,711,200	-	-	-
NOS Audiovisuais SGPS	55,176,000	35,000,000	90,176,000	55,176,000	35,000,000	90,176,000
Teliz	50,883,200	50,000	50,933,200	-	-	-
NOS Inovação	31,417,154	-	31,417,154	-	-	-
NOS Cinemas	25,876,270	-	25,876,270	-	-	-
NOS Property	9,000,000	-	9,000,000	9,000,000	-	9,000,000
NOS Corporate Centre	6,050,000	-	6,050,000	6,050,000	-	6,050,000
Mstar	5,518,502	-	5,518,502	-	-	-
NOS Wholesale	4,335,000	-	4,335,000	-	-	-
NOS 5G Fund	2,499,000	-	2,499,000	2,558,340	-	2,558,340
NOS Internacional SGPS	1,970,800	-	1,970,800	1,970,800	-	1,970,800
NOS Lusomundo SII	437,895	150,000	587,895	437,895	150,000	587,895
NOS Mediação de Seguros	50,000	-	50,000	50,000	-	50,000
Ten Twenty One	50,000	-	50,000	50,000	-	50,000
Upstar	26,528	-	26,528	-	-	-
	1,814,763,149	**35,200,000**	**1,849,963,149**	**1,572,054,635**	**35,150,000**	**1,607,204,635**

During the years ended 31 December 2023 and 2024, the movement in NOS' "Financial Holdings" was as follows:

	Equity holdings	Ancillary services	Total
Balance as at 1st January 2023	**812,926,949**	**35,160,000**	**848,086,949**
Increases	1,030,208,000	40,000	1,030,248,000
Impairment losses (Note 30)	(28,371,800)	-	(28,371,800)
Balance as at 31 December 2023	**1,814,763,149**	**35,200,000**	**1,849,963,149**
Balance as at 1st January 2024	**1,814,763,149**	**35,200,000**	**1,849,963,149**
Increases/(Decreases)	136,250	-	136,250
Decreases	(242,767,854)	(50,000)	(242,817,854)
Impairment losses (Note 30)	(76,910)	-	(76,910)
Balance as at 31 December 2024	**1,572,054,635**	**35,150,000**	**1,607,204,635**

During the year ended 31 December 2023, the main increases and decreases in this item were as follows:

i. NOS Comunicações, S.A.: increase in share capital by 1,000 million euros, by contribution in kind, through conversion of shareholder loans (Note 10);

ii. NOS Audiovisuais, SGPS: increase in share capital by 30 million euros, in kind, by conversion of shareholder loans (Note 10);

iii. Teliz: increase in impairment by 25.7 million euros and increase in ancillary instalments by 40 thousand euros;

iv. NOS Audio - Sales and Distribution: impairment increase of 2.4 million euros;

v. CEiiA: acquisition of 150 participation units for 150 thousand euros and impairment recognised for the entire amount.

During the year ended 31 December 2024, the main increases and decreases in this item were as follows:

i. Lusomundo Moçambique: increase in ancillary benefits by 136 thousand euros;

ii. NOS Cinemas: sale of the entire shareholding to NOS Audiovisuais SGPS for 125,758,000 euros;

iii. NOS Audio - Sales and Distribution: sale of the entire shareholding to NOS Audiovisuais SGPS for the sum of 121,320,589 euros;

iv. NOS Inovação: sale of the entire shareholding to NOS Comunicações for 76,035,000 euros;

v. Teliz: sale of the entire shareholding to NOS Internacional SGPS for 55,216,200 euros;

vi. NOS Wholesale: sale of the entire shareholding to NOS Comunicações for 40,811,000 euros;

vii. Mstar: sale of the entire shareholding to NOS Internacional SGPS for 15,364,600 euros; and

viii. Upstar: sale of the entire shareholding to NOS Internacional SGPS for the sum of 6,809,700 euros.

The capital gains and losses resulting from these disposals are detailed in Note 30.

The methodology used to determine the disposal value was based on the fair value of the holdings determined on the basis of valuations supported by external experts and calculated in accordance with note 2.7.

Impairment test on financial investments

In the 2024 financial year, impairment tests were carried out based on valuations using the discounted cash flow method, comparison with the equity and real estate assets held by the companies, which support the recoverability of the carrying amount of the financial holdings, in accordance with the assumptions made in Note 7.

The tests carried out resulted in a reinforcement of the impairment of the investment in Lusomundo Moçambique, in the amount of 136,250 euros, and a reversal of the impairment of the investment in Fundo NOS 5G, in the amount of 59,340 euros.

The assets, liabilities and equity, income and statutory results of subsidiaries and associates as at 31 December 2023 are as follows:

Company	Active	Liability	Equity	Total income	Total expenditure	Net profit	% Detained
NOS Comunicações	3,466,111,723	1,644,903,751	1,821,207,973	1,462,013,365	(1,321,073,248)	140,940,117	100%
NOS Audio - Sales and Distribution	53,667,148	18,577,689	35,089,459	62,083,111	(51,605,247)	10,477,863	71.45%
NOS Audiovisuais SGPS	118,305,210	12,519,026	105,786,184	-	(449,500)	(449,500)	100%
Teliz	35,717	5,556	30,161	242	(36,973)	(36,731)	100%
NOS Inovação	48,644,784	9,350,029	39,294,755	22,320,459	(15,479,917)	6,840,542	100%
NOS Lusomundo Cinemas	75,644,798	57,324,758	18,320,040	70,596,034	(63,083,519)	7,512,515	100%
NOS Property	28,906,976	8,357,269	20,549,707	24,140,500	(13,900,591)	10,239,909	100%
Mstar	23,347,250	13,355,360	9,991,890	27,591,408	(21,795,124)	5,796,284	29.4%
NOS Wholesale	17,067,008	7,048,908	10,018,100	28,927,614	(26,544,997)	2,382,617	100%
NOS Corporate Centre	45,228,741	37,127,955	8,100,786	29,220,259	(27,882,148)	1,338,111	100%
NOS 5G Fund	8,626,363	15,424	8,610,938	-	(469,767)	(469,767)	27.5%
NOS Internacional SGPS	1,889,815	9,238	1,880,578	-	(80,380)	(80,380)	100%
NOS Lusomundo SII	2,216,055	147,839	2,068,216	-	(28,275)	(28,275)	100%
NOS Seguros	414,585	148,498	266,087	366,377	(155,539)	210,838	100%
Ten Twenty One	8,949,098	8,101,670	847,428	8,507,090	(7,709,662)	797,428	100%
Upstar	19,796,199	15,671,875	4,124,324	17,467,481	(16,128,922)	1,338,559	30%
CEiiA*	52,888,931	48,205,601	4,683,330	21,813,786	(24,672,851)	(2,859,065)	16%
Sport TV**	129,337,644	106,140,700	23,196,944	192,205,624	(193,393,179)	(1,187,555)	25%
Lusomundo Mozambique	75,933	41,369	34,563	23,497	(76,449)	(52,952)	90%

The assets, liabilities and equity, income and statutory results of subsidiaries and associates as at 31 December 2024 are as follows:

Company	Active	Liability	Equity	Total income	Total expenditure	Net profit	% Detained
NOS Comunicações	3,517,104,718	1,540,353,173	1,976,751,544	1,555,047,246	(1,399,519,385)	155,527,861	100%
NOS Audiovisuais SGPS	406,013,731	302,015,026	103,998,705	-	(1,787,479)	(1,787,479)	100%
NOS Property	30,036,088	8,517,832	21,518,256	25,833,960	(15,146,816)	10,687,144	100%
NOS Corporate Centre	39,883,654	32,993,247	6,890,407	32,075,327	(33,177,193)	(1,101,866)	100%
NOS 5G Fund	9,314,789	11,734	9,303,054	652,326	(337,886)	314,440	27.5%
NOS Internacional SGPS	79,607,458	78,285,975	1,321,483	-	(559,095)	(559,095)	100%
NOS Lusomundo SII	2,172,508	214,913	1,957,595	3,800	(114,421)	(110,621)	100%
NOS Seguros	855,185	302,249	552,935	553,425	(266,577)	286,848	100%
Ten Twenty One	13,400,097	11,551,196	1,848,901	14,696,695	(13,782,031)	914,664	100%
CEiiA*	50,708,726	48,844,484	1,864,242	31,032,872	(33,224,469)	(2,191,597)	16.2%
Sport TV**	181,323,396	152,763,086	28,560,310	213,349,652	(207,986,286)	5,363,366	25%
Lusomundo Mozambique	42,778	-	42,778	34,271	(44,613)	(10,342)	90%

* The figures presented correspond to the year ended 31 December 202

**During the 2021 financial year, Sport TV changed its annual reporting period from 31 December to 30 June, so in the accounts presented in the table above, revenues and net income correspond to the figures for the 12-month reporting period of the financial year.

10. Accounts receivable

As at 31 December 2023 and 2024, this item is broken down as follows:

	2023		2024	
	Current	Non-current	Current	Non-current
Accounts receivable				
Related parties (Note 32)	108,499,886	98,395,000	97,316,951	375,826,500
Loans granted	79,595,365	98,395,000	22,860,254	375,826,500
RETGS Tax Consolidated	16,078,310	-	60,848,664	-
Others	12,826,211	-	13,608,033	-
Advances to suppliers	4,083	-	203,177	-
Others ii)	1,419,755	550,000	581,180	-
	109,923,724	**98,945,000**	**98,101,308**	**375,826,500**

On 31 December 2023 and 2024, the amounts receivable from related parties correspond predominantly to short-term loans, medium and long-term shareholder loans and interest receivable from Group companies (Note 32). During 2024, these short-term loans and shareholder loans earned interest at 2.4% and 4.1% respectively. The change in related party balances is essentially the result of the corporate reorganisation implemented in November 2024 (Note 9).

On 31 December 2023, this item corresponds predominantly to the amount receivable of 1.65 million euros for the sale of NOS International Carrier Services.

11. Taxes payable and recoverable

As at 31 December 2023 and 2024, these items are broken down as follows:

	2023		2024	
	Debtor balances	Credit balances	Debtor balances	Credit balances
Non-current				
Tax cases	-	1,316,573	-	1,358,459
	-	**1,316,573**	**-**	**1,358,459**
Current				
Corporate Income Tax (IRC)	30,738,969	-	-	36,560,598
Personal Income Tax (IRS)	-	156,741	-	101,646
Value Added Tax (VAT)	83,504	-	153,656	-
Social Security (SS)	-	131,558	-	88,916
	30,822,473	**288,299**	**153,656**	**36,751,160**

As at 31 December 2023 and 2024, the amounts receivable and payable relating to corporate income tax are broken down as follows:

	2023	2024
Estimated current income tax	(18,146,526)	(56,867,933)
Payments on account	47,110,564	16,806,579
Withholdings made to/from third parties	1,009,415	1,253,308
Tax to recover	765,516	2,247,448
Tax to (pay) / recover	**30,738,969**	**(36,560,598)**

The current tax estimate on income includes the tax estimate of the Company and its subsidiaries that comprise the tax consolidation, of which NOS SGPS is the parent company.

12. Other financial investments

On 31 December 2023 and 2024, the item other financial investments, in the amount of 12,950 euros, corresponds to equity holdings of low value.

13. Taxes and levies

NOS and its subsidiaries are subject to Corporate Income Tax (IRC) at a rate of 21% on taxable income (taxable profit minus any tax losses that may be deducted) plus a Municipal Surtax at a maximum rate of 1.5% on taxable income, thus reaching an aggregate rate of around 22.5%. In addition, with the austerity measures laid down in Law no. 66-B/2012, of 31 December, and the respective additions by Law no. 114/2017, of 29 December.º 114/2017, of 29 December, the State Surtax is levied on taxable profit at 3% on the part of each company's taxable profit that exceeds 1.5 million euros up to 7.5 million euros, at 5% on the part of each company's taxable profit that exceeds 7.5 million euros up to 35 million euros, and at 9% on the part of each company's taxable profit that exceeds 35 million euros

When calculating taxable profit, amounts that are not accepted (or should be considered) for tax purposes are added to (or subtracted from) the accounting result. These differences between the accounting and tax results can be of a temporary or permanent nature.

NOS is taxed in accordance with the special regime for the taxation of groups of companies (RETGS), which includes companies in which it holds, directly or indirectly, at least 75% of the capital and which meet the requirements set out in article 69 of the IRC Code.

The companies that are part of the RETGS in 2024 are as follows:

- NOS SGPS (parent company)
- Empracine
- Lusomundo Real
- Lusomundo SII
- NOS Azores
- NOS Audiovisuais
- NOS Audiovisuais SGPS

- NOS Cinemas
- NOS Comunicações SA
- NOS Inovação
- NOS Internacional SGPS
- NOS Audio - Sales and Distribution
- NOS Madeira
- NOS Mediação de Seguros
- NOS Sistemas
- NOS Technology
- NOS Wholesale
- NOS Corporate Centre
- NOS Property
- Per-mar
- Sontaria
- Teliz
- TenTwenty One

According to the legislation in force, tax returns are subject to review and correction by the tax authorities for a period of four years, with the exception of cases where tax losses or other credits have been assessed, namely tax benefits, the deadline for which, in these cases, coincides with the time limit for their utilisation. It should be noted that these deadlines may be suspended if inspections, claims or appeals are in progress.

The Board of Directors of NOS, supported by information from its tax advisors, believes that any revisions and corrections to these tax returns, as well as other tax contingencies, will not have a significant effect on the Company's financial statements as at 31 December 2024.

A. Deferred taxes

NOS recognised deferred taxes related to temporary differences between the tax and accounting bases of assets and liabilities, as well as tax losses carried forward (if applicable) at the statement of financial position date.

The movement in deferred tax assets and liabilities in the years ended 31 December 2023 and 2024 was as follows:

	31-12-2022	Net profit for the year	Equity	31-12-2023
Deferred tax assets				
Derivatives (Note 21)	-	-	233,095	233,095
Action Plans	584,241	92,593	-	676,834
Other provisions and adjustments	266,169	533,746	-	799,915
	850,410	**626,339**	**233,095**	**1,709,844**
Deferred tax liabilities				
Derivatives (Note 21)	(2,462,963)	-	1,251,044	(1,211,919)
	(2,462,963)	**-**	**1,251,044**	**(1,211,919)**
	(1,612,553)	**626,339**	**1,484,139**	**497,925**

	31-12-2023	Net profit for the year	Equity	31-12-2024
Deferred tax assets				
Derivatives (Note 21)	233,095	-	(193,639)	39,456
Action Plans	676,834	13,389	-	690,223
Other provisions and adjustments	799,915	(555,081)	-	244,834
	1,709,844	**(541,692)**	**(193,639)**	**974,513**
Deferred tax liabilities				
Derivatives (Note 21)	(1,211,919)	-	683,646	(528,273)
	(1,211,919)	**-**	**683,646**	**(528,273)**
	497,925	**(541,692)**	**490,007**	**446,240**

Deferred tax assets were recognised to the extent that it is probable that taxable profits will arise in the future that can be used to recover tax losses or deductible tax differences. This assessment was based on the company's business plan, which is periodically reviewed and updated.

On 31 December 2024, the tax rate used to calculate deferred tax assets relating to temporary differences was 21.5% (2023: 22.5%).

B. Reconciliation of the effective tax rate

For the years ended 31 December 2023 and 2024, the reconciliation between the nominal and effective tax rates is as follows:

	2023	2024
Profit before tax	7,446,103	188,966,443
Nominal tax rate	22.50%	22.50%
Expected tax	**1,675,373**	**42,517,450**
Permanent differences	(958,463)	(48,874,912)
Tax benefits	-	(157,500)
State surcharge	369,538	457,019
Autonomous taxation	5,708	42,446
Others	(20,374)	218,852
Income tax for the year	**1,071,782**	**(5,796,645)**
Effective tax rate	14.4%	(3.1%)
Current tax	1,698,121	(6,338,337)
Deferred tax	(626,339)	541,692
	1,071,782	**(5,796,645)**

At 31 December 2023 and 2024, permanent differences were as follows:

	2023	2024
Dividends (Note 30)	(33,063,022)	(19,046,209)
Disposal (Note 9)	-	(198,180,144)
Impairment of Financial Investments (Note 9 and 30)	28,371,800	76,910
Others	431,388	(72,388)
	(4,259,834)	**(217,221,831)**
	22.50%	22.50%
	(958,463)	**(48,874,912)**

14. Deferred costs

As at 31 December 2023 and 2024, this item is broken down as follows:

	2023	2024
Insurance	90,364	91,800
Other deferred costs	84,836	164,002
	175,200	**255,802**

15. Cash and cash equivalents

As at 31 December 2023 and 2024, this item breaks down as follows:

	2023	2024
Box	4,018	4,349
Bank deposits that can be mobilised immediately	11,183,487	5,284,800
	11,187,505	**5,289,149**

16. Equity

16.1. Paid-in capital

As at 31 December 2023 and 2024, NOS' share capital amounts to 855,167,890.80 euros. On 31 December 2024, the share capital is represented by 515,161,380 registered shares, in book-entry form, with a nominal value of 1.66 euros each (2023: 1.66 euros each).

The main shareholders at 31 December 2023 and 2024 are:

	2023		2024	
	Number of shares	% Share capital	Number of shares	% Share capital
Sonaecom, SGPS, S.A.	192,527,188	37.37%	192,527,188	37.37%
ZOPT, SGPS, SA	134,322,269	26.07%	134,322,269	26.07%
Mubadala Investment Company	25,758,569	5.00%	25,758,569	5.00%
Total	**352,608,026**	**68.45%**	**352,608,026**	**68.45%**

In accordance with Article 20(1)(b) and (c) and Article 21 of the Portuguese Securities Code, a qualifying holding of the Company's share capital and voting rights, calculated in accordance with Article 20 of the Portuguese Securities Code, is attributable to the following entities:

- Shareholding attributable to Sonaecom and, therefore, to the entities in a control relationship with Sonaecom, SGPS, S.A., namely Sontel, BV and Sonae, SGPS, S.A., directly or indirectly controlled by Efanor Investimentos, SGPS, S.A.. With effect from 29 November 2017, Efanor Investimentos SGPS, S.A. ceased to have a controlling shareholder under the terms and for the purposes of articles 20 and 21 of the Portuguese Securities Code.

- Participation attributable to ZOPT and, therefore, to the companies Kento Holding Limited and Unitel International Holdings, BV, as well as to Mrs Isabel dos Santos, being (i) Kento Holding Limited and Unitel International Holdings, BV, companies directly and indirectly controlled by Mrs Isabel dos Santos, and (ii) ZOPT, a company controlled by its shareholders Kento Holding Limited and Unitel International Holdings, BV.

Note: the calculation of the percentage of voting rights does not take into account own shares held by the Company.

16.2. Share premium

On 27 August 2013, following the completion of the merger between ZON and Optimus SGPS, the Company's share capital was increased by 856,404,278 euros, corresponding to the total number of shares issued (206,064,552 shares), based on the closing stock market price on 27 August 2013. The capital increase is detailed as follows:

- share capital of 2,060,646 euros;

- share premiums totalling 854,343,632 euros.

In addition, an amount of 125,000 euros was deducted from the share premiums for the respective capital increase.

The share premium is subject to the regime applicable to legal reserves and can only be utilised:

- to cover the part of the loss recognised in the balance sheet for the year that cannot be covered by the use of other reserves;

- to cover the part of the losses carried forward from the previous financial year that cannot be covered by the profit for the financial year or by the use of other reserves;

- for incorporation into the capital.

On 31 December 2024, the amount of the share premium is 4,202,356 euros (2023: 4,202,356 euros).

16.3. Own shares

Commercial legislation on treasury shares requires the existence of a non-distributable reserve of an amount equal to the purchase price of those shares, which becomes unavailable as long as those shares are not sold. In addition, the applicable accounting rules stipulate that gains or losses on the sale of own shares are recorded in reserves.

On 31 December 2024, there were 3,845,224 own shares, representing 0.7464% of the share capital (31 December 2023: 3,736,403 own shares, representing 0.7253% of the share capital).

The movements in the years ended 31 December 2023 and 2024 were as follows:

	Quantity	Value
Balance as at 1st January 2023	**4,008,391**	**15,967,529**
Acquisition of own shares	1,234,638	5,171,275
Distribution of own shares under share plans (Note 34)	(1,479,000)	(5,969,560)
Distribution of own shares as part of other remunerations	(27,626)	(110,254)
Balance as at 31 December 2023	**3,736,403**	**15,058,990**
Balance as at 1st January 2024	**3,736,403**	**15,058,990**
Acquisition of own shares	1,212,419	4,260,625
Distribution of own shares under share plans (Note 34)	(1,072,203)	(4,196,932)
Distribution of own shares as part of other remunerations	(31,395)	(120,602)
Balance as at 31 December 2024	**3,845,224**	**15,002,081**

16.4. Bookings

Legal reserves

Commercial legislation establishes that at least 5% of the annual net profit must be set aside to reinforce the legal reserve, until it represents 20% of the capital. This reserve is not distributable except in the event of the company's liquidation, but it can be used to absorb losses, after all other reserves have been exhausted, or to be incorporated into the capital.

Other bookings

On 31 December 2024, NOS had reserves which, by their nature, are considered distributable in the amount of around 78.3 million euros, not including the net profit for the year.

16.5. Dividends

The General Meeting held on 5 April 2023 approved the Board of Directors' proposal to pay an ordinary dividend per share of 0.278 euros and an extraordinary dividend of 0.152 euros, totalling 221,519 thousand euros. The dividend attributable to own shares totalled around 1,532 thousand euros. The dividends were paid on 21 April 2023.

The General Meeting held on 12 April 2024 approved the Board of Directors' proposal to pay an ordinary dividend per share of 0.35 euros, totalling 180,306 thousand euros. The dividend attributable to own shares totalled approximately 1,348 thousand euros. The dividends were paid on 24 April 2024.

16.6. Earnings per share

Earnings per share for the years ended 31 December 2023 and 2024 were calculated as follows:

	2023	2024
Results per share		
Net profit for the year	6,374,321	194,763,088
No. of ordinary shares outstanding during the year (weighted average)	511,392,858	508,822,765
Basic earnings per share - euros	0.01	0.38
Diluted earnings per share - euros	0.01	0.38

In the years ended 31 December 2023 and 2024 there were no dilutive effects with an impact on net profit per share, which is therefore equal to basic earnings per share.

17. Borrowings

As at 31 December 2023 and 2024, the breakdown of borrowings is as follows:

	31-12-2023		31-12-2024	
	Current	Non-current	Current	Non-current
Loans - nominal value	**142,635,601**	**951,000,000**	**160,018,524**	**758,500,000**
Bond loans	75,000,000	350,000,000	60,000,000	340,000,000
Commercial paper	67,600,000	601,000,000	100,000,000	418,500,000
Bank overdrafts	35,601	-	18,524	-
Loans - accruals and deferrals	**5,421,867**	**(1,183,238)**	**3,675,264**	**(939,862)**
Loans - amortised cost	**148,057,468**	**949,816,762**	**163,693,788**	**757,560,138**
Rentals	**50,409**	**53,188**	**96,219**	**131,153**
	148,107,877	**949,869,950**	**163,790,007**	**757,691,291**

The average cost of financing of the lines used during the year ended 31 December 2024 was approximately 3.8% (2023: 3.4%).

The average cost of global financing (drawn and undrawn lines) during the year ended 31 December 2024 was approximately 3.9% (2023: 3.5%)

As at 31 December 2023, there are no defaults in terms of principal, interest, conditions for redemption on loans payable or other commitments.

As at 31 December 2024, around 92% of the borrowings were indexed to ESG performance objectives (70% indexed to KPIs from the Sustainability Linked Financing Framework published by NOS, and 22% to ESG ratings or classifications).

The financing contracted under the Sustainability Linked Financing Framework is indexed to the objective of reducing greenhouse gas emissions from own operations (scope 1 and 2 emissions) by at least 80% by 2025, compared to 2019.

The verification date for this indicator will be 31 December 2025. With regard to ESG ratings and classifications, these lines are indexed to the CDP (Carbon Disclosure Project) and Moody's classifications, observed annually until the maturity of the contracts.

To date, no risk of non-compliance with the performance targets established in NOS' financing contracts is anticipated.

During the year ended 31 December 2024, the movements in Borrowings were as follows:

	Bank overdrafts	Bond loans	Commercial Paper	Rentals	Total
Balances as at 1st January 2024	**35,601**	**427,751,509**	**670,087,120**	**103,597**	**1,097,977,827**
Loan Receipts	-	50,000,000	282,200,000	-	332,200,000
Loan repayments	-	(75,000,000)	(432,300,000)	(123,759)	(507,423,759)
Change in Bank Overdrafts	(17,077)	-	-	-	(17,077)
Interest and commissions paid	(85,559)	(20,022,475)	(25,227,900)	(7,694)	(45,343,628)
Loan Commissions	-	480,603	2,270,534	-	2,751,137
Interest expense (Note 29)	85,559	18,147,976	22,848,036	7,694	41,089,265
Leases (Note 8)	-	-	-	247,534	247,534
Balances as at 31 December 2024	**18,524**	**401,357,613**	**519,877,790**	**227,372**	**921,481,299**

The interest and commissions paid shown in the cash flow statement include the amounts in the table above and interest and commissions paid to related parties totalling 7,189 thousand euros.

17.1. Bond loans

As at 31 December 2024, NOS has a total of 400 million euros in bonds issued:

- A 15 million euros bond loan placed in July 2021 by BPI and maturing in July 2026. The loan bears interest at a variable rate, indexed to Euribor and paid quarterly.
- A 75 million euros bond loan placed in March 2022 by Caixa Geral de Depósitos and maturing in March 2027. The loan bears interest at a variable rate, indexed to Euribor and paid every six months.
- Bond loan totalling 75 million euros, placed in July 2022 by BPI and maturing in March 2027. The loan bears interest at a variable rate, indexed to Euribor and paid quarterly.
- A 50 million euros bond loan placed in April 2023 by BPI and maturing in January 2028. The loan bears interest at a variable rate, indexed to Euribor and paid quarterly.
- A 75 million euros bond loan placed in April 2023 by Caixa Geral de Depósitos and maturing in April 2028. The loan bears interest at a variable rate, indexed to Euribor and paid every six months.

- A 60 million euros bond loan placed in December 2023 by BPI and maturing in June 2025. The loan bears interest at a variable rate, indexed to Euribor and paid every six months.

- A 50 million euros bond loan placed in January 2024 by Caixa Geral de Depósitos and maturing in July 2026. The loan bears interest at a variable rate, indexed to Euribor and paid every six months.

On 31 December 2024, the net amount of 1,358 million euros was added to the value of these loans, corresponding to the respective interest and commissions, recorded under Loans - accruals and deferrals.

17.2. Commercial paper

As at 31 December 2024, the company has a debt of 518.5 million euros, in the form of commercial paper, of which 39.5 million euros are issued under programmes without underwriting. The total amount contracted under underwriting programmes is 875 million euros, corresponding to 16 programmes with 6 banks, 775 million of which bear interest at market rates and 100 million are issued at fixed rates. Commercial paper programmes with a maturity of more than 1 year are classified as non-current, amounting to 715 million euros (of which 379.0 million euros are used as at 31 December 2024), since the company has the capacity to unilaterally renew current issues until the programmes mature and they are underwritten by the organiser. As such, the amount in question, despite having a current maturity, has been classified as non-current for the purposes of presentation in the statement of financial position.

On 31 December 2024, the net amount of 1,378 thousand euros was added to the value of these loans, corresponding to the respective interest and commissions, recorded under Loans - accruals and deferrals.

On 31 December 2023 and 2024, the maturity of the loans is as follows:

	2023			2024		
	Less than 1 year	**Between 1 and 5 years**	**More than 5 years**	**Less than 1 year**	**Between 1 and 5 years**	**More than 5 years**
Bond loans	78,743,172	349,008,337	-	62,191,064	339,166,548	-
Commercial paper	69,278,695	600,808,425	-	101,484,200	418,393,590	-
Bank overdrafts	35,601	-	-	18,524	-	-
Rentals	50,409	53,188	-	96,219	131,153	-
	148,107,877	**949,869,950**	**-**	**163,790,007**	**757,691,291**	**-**

18. Provisions

In the years ending 31 December 2023 and 2024, the movements recorded under provisions are as follows:

	31-12-2022	Reinforcement	Reduction	Uses and Other	31-12-2023
Ongoing legal proceedings and others	3,348	425,646		-	428,994
Miscellaneous contingencies	188,166	2,784,685	-	(369,900)	2,602,951
	191,514	**3,210,331**	**-**	**(369,900)**	**3,031,945**

	31-12-2023	Reinforcement	Reduction	Uses and Other	31-12-2024
Ongoing legal proceedings and others	428,994	4,592	-	-	433,586
Miscellaneous contingencies	2,602,951	19,796	-	(2,434,581)	188,166
	3,031,945	**24,388**	**-**	**(2,434,581)**	**621,752**

The movements recorded under "Utilisations and Other" correspond predominantly to compensation payments.

The net movements in reinforcements and reductions for the years ended 31 December 2023 and 2024, reflected in the income statement under Provisions, are broken down as follows:

	2023	2024
Restructuring costs (Note 27)	2,784,685	19,796
Provisions and adjustments	313,204	(57,434)
Interest on late payments (Note 29)	99,147	62,283
Interest and other	13,295	-
Reinforcements and reductions	**3,210,331**	**24,388**

19. Accruals

As at 31 December 2023 and 2024, this item is broken down as follows:

	2023		2024	
	Current	Non-current	Current	Non-current
Wages and salaries	2,092,645	-	2,142,097	-
External supplies and services	328,556	-	438,387	-
Others	-	454,886	-	454,887
	2,421,201	**454,886**	**2,580,484**	**454,887**

20. Deferred income

As at 31 December 2023 and 2024, this item is broken down as follows:

	2023		2024	
	Current	Non-current	Current	Non-current
Others	18,573	-	-	-
	18,573	**-**	**-**	**-**

21. Derivative financial instruments

Interest rate derivatives

As at 31 December 2024, NOS has contracted 3 interest rate derivatives totalling 180 million euros (31 December 2023: 180 million euros) and 9 zero cost collars, totalling 377.5 million euros, contracted in 2023 (31 December: 377.5 million euros).

	2023				
	Notional	Active		Liability	
		Current	Non-current	Current	Non-current
Derivatives					
Interest rate derivatives	557,500,000	-	5,386,308	-	1,035,978
	557,500,000	**-**	**5,386,308**	**-**	**1,035,978**

	2024				
	Notional	Active		Liability	
		Current	Non-current	Current	Non-current
Derivatives					
Interest rate derivatives	557,500,000	-	2,457,084	183,515	-
	557,500,000	**-**	**2,457,084**	**183,515**	**-**

In the years ended 31 December 2023 and 2024, the movements occurred are as follows:

	31-12-2022	Results	Equity	31-12-2023
Fair value of interest rate derivatives	10,946,504	-	(6,596,174)	4,350,330
Derivatives	**10,946,504**	**-**	**(6,596,174)**	**4,350,330**
Deferred tax assets (Note 13)	-	-	233,095	233,095
Deferred tax liability (Note 13)	(2,462,963)	-	1,251,044	(1,211,919)
Deferred tax	**(2,462,963)**	**-**	**1,484,139**	**(978,824)**
	8,483,541	**-**	**(5,112,035)**	**3,371,506**

	31-12-2023	Results	Equity	31-12-2024
Fair value of interest rate derivatives	4,350,330	-	(2,076,761)	2,273,569
Derivatives	**4,350,330**	**-**	**(2,076,761)**	**2,273,569**
Deferred tax assets (Note 13)	233,095	-	(193,639)	39,456
Deferred tax liability (Note 13)	(1,211,919)	-	683,646	(528,273)
Deferred tax	**(978,824)**	**-**	**490,007**	**(488,817)**
	3,371,506	**-**	**(1,586,754)**	**1,784,752**

22. Accounts payable

As at 31 December 2023 and 2024, this item is broken down as follows:

	31-12-2023	31-12-2024
Accounts payable		
Borrowings from related parties (Note 32)	250,297,269	362,242,107
Suppliers	425,620	423,207
Suppliers of tangible fixed assets	-	1,590
Others	312,907	97,164
	251,035,796	**362,764,068**

During the 2024 financial year, these borrowings from related parties bore interest at a rate of 2.4% (2023: 1.1%).

23. Provision of services

On 31 December 2023 and 2024, this item corresponds essentially to management services provided to NOS Group companies (Note 32).

24. Wages and salaries

In the financial years ending 31 December 2023 and 2024, this item was broken down as follows:

	2023	2024
Remuneration	6,760,297	6,804,973
Social charges	891,668	858,735
Social benefits	153,255	174,353
Others	13,062	9,446
	7,818,282	**7,847,507**

The figures included in the table above correspond to the figures for key management members, 15 in 2024 (15 in 2023)

25. External supplies and services

As at 31 December 2023 and 2024, this item is broken down as follows:

	2023	2024
Support Services	1,594,654	1,588,443
Specialised jobs	198,182	194,996
Travel and subsistence	127,442	166,986
Insurance	125,482	118,135
Fuels	37,293	38,157
Cleanliness, hygiene and comfort	20,840	14,666
Litigation and notaries	18,998	5,744
Communication	12,384	5,053
Other external supplies and services	53,710	53,623
	2,188,985	**2,185,803**

26. Other operating costs / (gains)

As at 31 December 2023 and 2024, this item is broken down as follows:

	2023	2024
Membership fees	51,460	53,100
Others	603	78
	52,063	**53,178**

27. Restructuring costs

In the years ending 31 December 2023 and 2024, restructuring costs are broken down as follows:

	2023	2024
Compensation	2,784,685	19,796
	2,784,685	**19,796**

28. Other non-recurring costs / (gains)

The breakdown of this item for the years ended 31 December 2023 and 2024 is as follows:

	2023	2024
Donations	15,000	15,000
Fines and penalties	308	546
Others	(37,796)	(30,669)
	(22,488)	**(15,123)**

29. Financing costs / (gains) and other financial costs / (income)

In the years ending 31 December 2023 and 2024, financing costs and other net financial costs are broken down as follows:

	2023	2024
Financing costs / (gains):		
Interest paid		
Bond loans	16,568,551	18,147,976
Commercial paper	22,697,257	22,848,036
External loans and bank overdrafts	73,343	85,559
Derivatives	50,213	-
Related parties (Note 32)	1,349,024	9,690,274
Rentals	2,856	7,694
Interest on late payments (Note 18)	99,147	62,283
Others	2,090	1,714
	40,842,481	**50,843,536**
Interest earned		
Related parties (Note 32)	(35,356,379)	(9,805,764)
Derivatives	(3,098,815)	(4,091,486)
Others	(125,585)	(313,909)
	(38,580,779)	**(14,211,159)**
	2,261,702	**36,632,377**
Other net financial costs / (income):		
Commissions on commercial paper	2,315,103	2,270,534
Commissions on bond loans	689,892	480,603
Banking services	63,729	76,738
Related parties (Note 32)	-	143,629
Others	12,394	182,940
	3,081,118	**3,010,815**

The reduction in interest earned from related parties is essentially the result of the reduction in the average balances of loans granted.

30. Losses / (gains) in subsidiaries

In the years ended 31 December 2023 and 2024, this item was broken down as follows:

	2023	2024
Dividends		
NOS Property	(9,042,053)	(9,714,061)
NOS Audio - Sales and Distribution*	(8,610,158)	(7,095,283)
NOS Cinemas	(7,035,509)	-
NOS Inovação	(3,928,599)	-
NOS Wholesale	(1,817,243)	(2,234,314)
NOS Corporate Centre	(1,757,138)	-
Mstar	(777,551)	-
NOS Mediação de Seguros	(94,771)	-
Others	-	(2,551)
	(33,063,022)	**(19,046,209)**
(Gains)/losses on the sale of companies (Note 9)		
NOS Cinemas	-	(99,881,731)
NOS Inovação	-	(44,617,847)
NOS Wholesale	-	(36,476,000)
Mstar	-	(9,529,006)
Upstar	-	(6,783,172)
Teliz	-	(4,283,000)
NOS Audio - Sales and Distribution	-	3,390,612
	-	**(198,180,144)**
Others		
Impairment losses/(reversals of losses) on financial investments (Note 9)	28,371,800	76,910
	28,371,800	**76,910**
	(4,691,222)	(217,149,443)

31. Financial guarantees and commitments

31.1. Guarantees

As at 31 December 2023 and 2024, the Company has guarantees in favour of third parties corresponding to the following situations:

	2023	2024
Guarantees in favour of:		
Tax administration	30,256,612	32,515,669
Others	1,172	1,172
	30,257,784	**32,516,842**

On 31 December 2023 and 2024, this amount refers to guarantees demanded by the Tax Authorities as part of tax proceedings contested by the Company and its subsidiaries.

Other guarantees

During the first quarter of 2015, 2016, 2017 and 2018, and following the assessment note for CLSU 2007-2009, 2010-2011, 2012-2013 and 2014, respectively, NOS set up guarantees in favour of the Universal Service Compensation Fund, in the amounts of 23.6 million euros, 16.7 million euros, 17.5 million euros and 3.0 million euros, respectively, in order to prevent the opening of tax enforcement proceedings with a view to the coercive payment of the amount assessed.

Furthermore, in addition to the guarantees required by the Tax Authorities, sureties were set up for ongoing tax cases in which NOS was a guarantor for NOS SA, totalling 14.1 million euros.

31.2. Other commitments

Covenants

Of the borrowings (excluding finance leases), in addition to being subject to the Group's compliance with its obligations (operational, legal and tax) 100% are subject to Cross default and Pari Passu clauses, 96% are subject to Negative Pledge clauses and 69% are subject to Ownership clauses.

In addition, around 18% of the total loans obtained require that consolidated net financial debt does not exceed up to 3 times EBITDA after consolidated lease payments, around 16% require that consolidated net financial debt does not exceed up to 4 times EBITDA after consolidated lease payments and around 6% require that consolidated net financial debt does not exceed up to 4.5 times EBITDA after consolidated lease payments.

Net Financial Debt = Loans - Leases - Cash and Cash Equivalents

EBITDA = Operating profit + Depreciation, amortisation and impairment losses + Restructuring costs + Losses / (gains) on disposal of assets + Other non-recurring costs / (gains)

EBITDA after leases = EBITDA - leases (Capital and Interest)

Football Contract

In December 2015, NOS signed a contract with Sport Lisboa e Benfica - Futebol SAD and Benfica TV, S.A. for the television broadcasting rights of home matches of the Benfica SAD senior football team for the NOS League, as well as the broadcasting and distribution rights of the Benfica TV Channel. The contract began in the 2016/2017 sporting season and has an initial duration of 3 years, which can be renewed by decision of either party up to a total of 10 sporting seasons, with the overall financial consideration totalling 400 million euros, broken down into progressive annual amounts.

Also in December 2015, NOS signed a contract with Sporting Clube de Portugal - Futebol SAD and Sporting Comunicação e Plataformas, S.A. that includes the following rights:

1) TV and multimedia broadcasting rights for the home matches of Sporting SAD's senior football team;

2) The right to exploit static and virtual advertising at the José Alvalade stadium;

3) Right to broadcast and distribute the Sporting TV Channel; e,

4) The right to be your Main Sponsor.

The contract will have a duration of 10 seasons for the rights mentioned in 1) and 2) above, starting in July 2018, 12 seasons for the rights mentioned in 3) starting in July 2017 and 12 and a half seasons for the rights mentioned in 4) starting in January 2016, with the overall financial consideration totalling 446 million euros, broken down into progressive annual amounts.

Also in December 2015, NOS signed contracts for the television broadcasting rights of senior football home games with the following sports companies:

1) Associação Académica de Coimbra - Organismo Autónomo de Futebol, SDUQ, Lda

2) Os Belenenses Sociedade Desportiva Futebol, SAD

3) Clube Desportivo Nacional Futebol, SAD

4) Futebol Clube de Arouca - Futebol, SDUQ, Lda

5) Futebol Clube de Paços de Ferreira, SDUQ, Lda

6) Marítimo da Madeira Futebol, SAD

7) Sporting Clube de Braga - Futebol, SAD

8) Vitória Futebol Clube, SAD

The contracts all start in the 2019/2020 season and last for up to 7 seasons, with the exception of the contract with Sporting Clube de Braga - Futebol, SAD, which lasts for 9 seasons.

In May 2016, NOS and Vodafone agreed to make available to each other, for several sports seasons, sports content (national and international) held by the companies, directly by the transferring party or indirectly through the transfer to third-party content distribution channels or models, with the aim of ensuring that both companies can make available the rights to broadcast the clubs' home matches, as well as the rights to broadcast and distribute sports channels and club channels whose rights are held by each of the parties at any given time. The agreement took effect as of the 16/17 sports season, guaranteeing that NOS and Vodafone customers can access the Benfica channel and Benfica's home matches, regardless of the channel on which these matches are broadcast.

Taking into account the possibility of extending the agreement to other operators, in July 2016 MEO and Cabovisão signed up to it, putting an end to the lack of availability of the Porto Canal on the NOS grid and guaranteeing that all pay-TV customers in Portugal can have access to all relevant sports content, regardless of the telecoms operator they use.

As part of the agreement with the other operators, which is being made in some cases directly and in others through the transfer to third-party channels in return for the reciprocal provision of rights, the overall costs are shared out according to telecoms retail revenues and Pay TV market shares.

Considering that, within the framework of the agreement signed with the other operators, the risks and benefits associated with the contracts with the clubs are shared between the operators, the agreement was considered a *collaborative arrangement*, which is why the revenue (with the operators) is offset against the expenses with the clubs.

Additional disclosures are made in the consolidated financial statements of NOS SGPS.

32. Related parties

The balances as at 31 December 2023 and 2024 and the transactions with related parties in the year ended 31 December 2023 and 2024 are as follows:

Balances as at 31 December 2023

	Accounts receivable	Accounts Payable and Accrued Costs	Loans granted	Loans obtained
Subsidiary companies	**20,182,986**	**1,758,589**	**105,431,853**	**238,888,786**
NOS Lusomundo Cinemas	2,201,957	736,641	-	16,414,063
Lusomundo SII	(5,150)	-	49,576	52
NOS Audiovisuais SGPS	(760,334)	-	12,042,962	1,168,045
NOS Corporate Centre	330,584	566,936	-	5,356,257
NOS Inovação	(976,014)	-	-	9,588,441
NOS Property	3,679,669	-	-	21,179,918
NOS Seguros	61,788	-	-	48,042
NOS Wholesale	764,989	-	-	11,917,457
NOS Comunicações	10,919,843	126	90,199,389	137,573,547
NOS INTERNACIONAL, SGPS, S.A.	(33,029)	-	-	132,196
TELIZ HOLDING, S.A.	(9,502)	-	41	20,954
NOS AUDIO - Sales and Distribution, S.A.	856,845	454,886	3,139,885	35,489,815
TEN TWENTY ONE, S.A.	3,153,357	-	-	-
Other subsidiaries	(2,017)	-	-	-
Other related parties	**8,721,535**	**313,191**	**72,558,512**	**11,408,483**
NOS Technology	6,471,234	1,493	60,528,061	-
Empracine-E.Pro.Act. Cinem, Lda	(12,265)	-	64,476	-
Banco Bic Português, S.A.	-	-	-	18,493
Lusomundo Imobiliária 2, S.A.	(16,361)	-	-	161,958
NOS Systems	1,019,394	-	3,374,796	-
NOS SISTEMAS ESPAÑA, S.L.	14,014	-	-	-
Per-Mar-Sociedade de Construções, S.A.	31,277	-	-	121,706
Sontaria	69,493	-	-	823,926
NOS Açores Comunicações	(727,892)	-	8,591,179	-
NOS Lusomundo Audiovisuais, S.A.	1,655,253	311,381	-	4,032,896
NOS Madeira Communications	213,283	-	-	6,249,505
Other related parties	4,106	317	-	-
	28,904,521	**2,071,779**	**177,990,365**	**250,297,269**

Transactions during the year ended 31 December 2023

	Sales, services and other income	Purchases and services received	Interest earned	Interest paid
Subsidiary companies	**12,503,666**	**1,386,400**	**34,833,845**	**1,256,210**
NOS Lusomundo Cinemas	578,221	319	-	163,469
NOS Audiovisuais SGPS	-	-	1,322,301	(30)
NOS Corporate Centre	223,837	1,442,963	-	69,114
NOS Inovação	437,869	(36)	-	108,852
NOS Property	183,257	(2,808)	-	192,036
NOS Wholesale	74,737	(2,250)	-	114,086
NOS Comunicações	10,555,948	5,553	33,474,523	255,319
NOS AUDIO - Sales and Distribution, S.A.	410,460	(274)	-	350,563
Teliz Holding, S.A.	6,272	(57,389)	222	148
Ten Twenty One, S.A.	27,001	(193)	36,666	-
Other subsidiaries	6,065	513	132	2,653
Other related parties	**5,801,420**	**(3,398)**	**684,029**	**91,807**
NOS Technology	4,721,941	4,685	335,790	(202)
NOS Lusomundo Audiovisuais, S.A.	687,126	(71)	44,517	12,919
NOS Systems	131,596	(45)	108,109	-
Per-Mar-Sociedade de Construções, S.A.	8,255	-	-	18,805
Sontaria	14,715	-	-	9,007
NOS Acores Comunicações	31,992	-	188,061	-
NOS Madeira Comunicações	205,546	-	3,183	51,278
Other related parties	249	(7,968)	4,371	-
	18,305,086	**1,383,002**	**35,517,875**	**1,348,018**

Balances as at 31 December 2024

	Accounts receivable	Accounts Payable and Accrued Costs	Loans granted	Loans obtained
Subsidiary companies	**42,262,245**	**697,903**	**387,988,473**	**150,068,172**
Lusomundo Soc. Inv. Imob., S.A.	(7,910)	-	953	150,977
NOS Audiovisuais, SGPS, S.A.	(1,366,947)	-	301,885,668	1,359,545
NOS Corporate Centre, S.A.	985,463	370,697	-	1,438,220
NOS Property, S.A.	3,964,316	50,084	-	21,369,763
NOS Mediação de Seguros, S.A.	82,483	-	-	517,586
NOS Comunicações, S.A.	38,442,073	277,122	820,668	125,089,231
NOS Internacional, SGPS, S.A.	(223,313)	-	78,272,483	142,851
Ten Twenty One, S.A.	386,082	-	7,008,701	-
Other related parties	**32,194,452**	**482,179**	**10,698,281**	**212,173,935**
NOS Technology, S.A.	18,491,105	18,725	-	55,760,253
Empracine-E.Pro.Act. Cinem, Lda.	48,578	-	-	-
Lusomundo Imobiliária 2, S.A.	121,407	-	-	271,869
NOS Sistemas, S.A.	1,296,690	-	2,442,381	-
NOS Sistemas España, S.L.	15,783	-	-	-
Per-mar - Sociedade de Construção, S.A.	91,653	133	-	2,820,097
Sontária - Empreendimentos Imobiliários, S.A.	164,527	-	-	2,414,210
NOS Açores Comunicações, S.A.	(506,084)	-	8,255,900	-
NOS Lusomundo Audiovisuais, S.A.	1,486,280	-	-	53,645,306
NOS Madeira Comunicações, S.A.	1,385,471	-	-	8,772,391
NOS Lusomundo Cinemas, S.A.	2,361,847	-	-	22,288,217
NOS Inovação, S.A.	1,787,992	-	-	16,495,291
NOS Wholesale, S.A.	708,792	-	-	12,555,658
Teliz Holding, S.A.	(7,401)	1,574	-	1,836
NOS Audio - Sales and Distribution, S.A.	4,743,702	454,886	-	37,148,807
Other related parties	4,110	6,860	-	-
	74,456,697	**1,180,081**	**398,686,754**	**362,242,107**

Transactions during the year ended 31 December 2024

	Sales, services and other income	Purchases and services received	Interest earned	Interest paid
Subsidiary companies	**13,692,610**	**1,386,052**	**8,829,411**	**6,226,790**
NOS Audiovisuais, SGPS, S.A.	-	-	3,656,946	20,508
NOS Corporate Centre, S.A.	217,819	1,415,199	-	122,907
NOS Property, S.A.	356,243	(2,937)	-	565,654
NOS Comunicações, S.A.	13,078,799	(26,064)	4,165,960	5,507,552
Ten Twenty One, S.A.	30,042	(54)	110,363	-
NOS Internacional, SGPS, S.A.	-	-	891,983	2,679
Other subsidiaries	9,707	(92)	4,159	7,490
Other related parties	**8,005,775**	**2,195**	**1,119,982**	**3,463,581**
NOS Technology, S.A.	5,418,716	3,501	538,399	883,205
NOS Lusomundo Audiovisuais, S.A.	700,555	(72)	48,332	280,635
NOS Sistemas, S.A.	145,016	(72)	202,033	-
Per-mar - Sociedade de Construção, S.A.	8,395	-	-	10,663
Sontária - Empreendimentos Imobiliários, S.A.	14,810	-	-	44,457
NOS Açores Comunicações, S.A.	38,798	-	326,212	-
NOS Madeira Comunicações, S.A.	186,886	-	2,888	208,178
NOS Lusomundo Cinemas, S.A.	537,055	(36)	-	466,652
NOS Inovação, S.A.	496,424	(81)	-	307,952
NOS Wholesale, S.A.	58,765	205	-	306,671
NOS Audio - Sales and Distribution, S.A.	399,140	(280)	-	948,204
Other related parties	1,215	(970)	2,118	6,964
	21,698,385	**1,388,247**	**9,949,393**	**9,690,371**

33. Remuneration of key management members

In the years ended 31 December 2023 and 2024, the remuneration paid/attributed to the directors and other key members of NOS management (Managers) was as follows:

	12M23	12M24
Remuneration	3,614,318	3,515,033
Profit sharing	1,467,048	1,295,472
Assigned action plan	1,467,048	1,295,472
	6,548,414	**6,105,977**

The average number of key management members in 2024 is 15 (15 in 2023).

The Corporate Governance Report includes more detailed information on NOS' remuneration policy. The Company considers the members of the Board of Directors to be Directors.

34. Action plan

The General Meeting of 23 April 2014 approved the Regulation on Short and Medium Term Variable Remuneration, which establishes the terms of the Share Award Plan ("NOS Plan"). This plan is aimed at employees above a certain level of function, and the rights are exercised three years after they are awarded, provided that the employee remains with the company during this period.

As at 31 December 2024, the outstanding plans of the Company and its subsidiaries are as follows:

	Number of of shares
NOS Plan	
Plan 2022	1,242,619
Plan 2023	1,112,875
Plan 2024	1,257,476

During the year ended 31 December 2024, the movements under the Plans are detailed as follows:

Movement in the number of outstanding claims

	Plan 2021	Plan 2022	Plan 2023	Plan 2024	Total
Balance as at 31 December 2023	**1,426,069**	**1,164,196**	**1,038,600**	**-**	**3,628,865**
Exercise movements					
Allocated	-	-	-	1,167,302	1,167,302
In Office	(1,059,516)	(7,976)	(3,536)	(1,175)	(1,072,203)
Cancelled / Terminated / Corrected (1)	(366,553)	86,399	77,811	91,349	(110,994)
Balance as at 31st December 2024	**-**	**1,242,619**	**1,112,875**	**1,257,476**	**3,612,970**

(1) Includes, predominantly, corrections made to the dividend paid, shares relating to exceptionally cash-settled plans, and shares relating to employees leaving without the right to receive shares.

The costs of share plans are recognised over the period between the award and the exercise of the shares. The liability for the plans is calculated on the basis of the share price on the grant date of each plan, for plans settled in shares, or on the closing date, for plans settled in cash, and the liability is recognised in Reserves.

At 31 December 2024, the outstanding liability relating to these plans is 7,304 thousand euros, and is fully recorded in Reserves.

For the years ended 31 December 2023 and 2024, the costs recognised and the respective liability are as follows:

	12M 23	12M 24
Costs recognised in previous years for plans open as at 31 December 2023	6,674,984	7,099,118
Costs of plans exercised during the year (inducted)	(4,670,098)	(3,276,837)
Costs of cash-settled plans	-	(1,180,255)
Costs recognised in the year and others*	5,094,232	4,661,661
Total flat costs	**7,099,118**	**7,303,687**

* Includes the recognised costs of the company and its subsidiaries

In addition, during the year ended 31 December 2024, the Board of Directors of NOS SGPS approved a charge to its subsidiaries relating to the share plans in the amount of 785 thousand euros.

35. Disclosures required by legislation

The information on the fees and services provided by the auditors is described in point 47 of the Corporate Governance Report.

36. Other issues

Preventive seizure of 26.075% of the share capital of NOS, SGPS, S.A.

On 4 April 2020, SONAECOM, SGPS, S.A. ("Sonaecom"), owner of 50% of the share capital of ZOPT, SGPS, S.A. (hereinafter "ZOPT"), was informed by its subsidiary of the communication received from the Central Criminal Investigation Court of Lisbon (hereinafter the Court) to proceed with the preventive seizure of 26.075% of the share capital of NOS, SGPS, SA, corresponding to half of the shareholding in NOS held by ZOPT and, indirectly, by the companies Unitel International Holdings, BV and Kento Holding Limited", controlled by Isabel dos Santos.

Under the terms of this decision, the seized shares are deprived of the right to vote and the right to receive dividends, the latter of which must be deposited at Caixa Geral de Depósitos, S.A. to the order of the Court.

The other half of ZOPT's stake in NOS' share capital, corresponding to an identical 26.075% - and which, at least in line with the criteria used by the Court, embodies the 50% held in ZOPT by SONAECOM - was not seized, nor were the rights inherent to it subject to any limitation.

On 12 June 2020, ZOPT was authorised by the Lisbon Central Criminal Investigation Court to exercise the voting rights corresponding to the 26.075% of NOS's share capital that had been preventively seized by order of that Court.

Following the communication of 4 April 2020, ZOPT filed third-party motions, which were rejected by the investigating judge in June 2020 on the grounds that the Portuguese courts had no jurisdiction to hear and decide them, a decision which, having been appealed by ZOPT, was revoked by the Lisbon Court of Appeal (TRL) in February 2021.

In November 2021, the investigating judge, taking cognisance of the merits of the case, dismissed the third-party objections filed by ZOPT, a decision which, according to ZOPT, was appealed to the Court of Appeal at . After being admitted in February 2022, in June 2022 ZOPT was notified of the decision to dismiss the appeal.

In September 2022, Sonaecom informed that the General Meeting of ZOPT decided to proceed with the amortisation of Sonaecom's shareholding in that company and the reimbursement of the ancillary payments made by Sonaecom, for a consideration that includes the delivery of shares representing 26.075% of the share capital of NOS. As a result of this amortisation, which was subject to the applicable legal procedures, Sonaecom ceased to be a shareholder in ZOPT, which is now wholly owned by Unitel International Holdings, BV and Kento Holding Limited, companies controlled by Isabel do Santos. In December 2022, Sonaecom, at the culmination of the fulfilment of the legal procedures, informed that it now directly holds 134,322,268 ordinary shares in NOS, corresponding to 26.07% of the share capital.

He also informed that this participation is also attributable to the entities that are in a control relationship with him, namely SONTEL, BV, Sonae Investments, BV, SONAE, SGPS, S.A. and EFANOR INVESTIMENTOS, SGPS, S.A..

The Board of Directors of NOS is not aware of any possible developments in the preventive seizure process referred to above.

To date, Sonaecom holds 192,527,188 ordinary shares corresponding to 37.37% of NOS' share capital.

37. Subsequent events

On 27 January 2025, NOS and the Claranet Group signed an agreement for the acquisition by NOS Information Technologies, SGPS, S.A. (incorporated in January 2025) of 100% of the share capital of Claranet Portugal, for the sum of 152 million euros. This operation reinforces NOS's strategic objective of leadership in ICT services in Portugal, consolidating its position as a technological partner of reference for national companies and institutions.

This acquisition accelerates the company's growth in the information technology segments, bringing together Claranet's skills, experience and assets to provide innovative solutions that drive the digital transformation of the Portuguese economy and society.

Claranet Portugal, present in the market since 2005, recorded total revenues of 205 million euros and an EBITDA of 15.4 million euros in the financial year ending 30 June 2024. The company has more than 900 employees and will continue to operate autonomously, preserving its identity, management, teams and solid customer base.

Completion of the transaction is subject to non-opposition by the Competition Authority. As of the date of signing this Annual Report, no position has been released by the Competition Authority regarding this operation.

These financial statements are a translation of financial statements originally issued in Portuguese in accordance with International Financial Reporting Standards (IAS / IFRS) as adopted by the European Union and the format and disclosures required by those Standards, some of which may not conform to or be required by generally accepted accounting principles in other countries. In the event of discrepancies, the Portuguese language version prevails.

Statutory Auditors' Report and Auditors' Report

KPMG & Associados – Sociedade de Revisores Oficiais de Contas, S.A.
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STATUTORY AUDITORS' REPORT and AUDITORS' REPORT

(Free translation from a report originally issued in Portuguese language. In case of doubt the Portuguese version will always prevail.)

REPORT ON THE AUDIT OF THE FINANCIAL STATEMENTS

Opinion

We have audited the accompanying financial statements of **NOS, SGPS, S.A.** (the Entity), which comprise the statement of financial position as at 31 December 2024 (showing a total of 2,544,532,707 euros and total equity of 1,217,808,811 euros, including a profit for the year of 194,763,088 euros), and the income statement by nature, the statement of comprehensive income, the statement of changes in equity and the statement of cash flows for the year then ended, and notes to the financial statements, including material accounting policy information.

In our opinion, the accompanying financial statements give a true and fair view, in all material respects, of the financial position of **NOS, SGPS, S.A.** as at 31 December 2024 and of its financial performance and its cash flows for the year then ended in accordance with the International Financial Reporting Standards as adopted by the European Union.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs) and further technical and ethical standards and guidelines as issued by Ordem dos Revisores Oficiais de Contas (the Portuguese Institute of Statutory Auditors). Our responsibilities under those standards are further described in the "Auditors' Responsibilities for the Audit of the Financial Statements" section below. We are independent of the Entity in accordance with the law and we have fulfilled other ethical requirements in accordance with the Ordem dos Revisores Oficiais de Contas' code of ethics.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

KPMG & Associados – Sociedade de Revisores Oficiais de Contas, S.A., a Portuguese private limited company and a member firm of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee.

KPMG & Associados – Sociedade de Revisores Oficiais de Contas, S.A.
Capital Social: 3.916.000 Euros – Pessoa Colectiva Nº PT 502 161 078 –
Inscrito na O.R.O.C. Nº 189 – Inscrito na C.M.V.M. Nº 20161489
Matriculada na Conservatória do Registo Comercial de Lisboa sob o Nº PT 502 161 078

Recoverability of goodwill and Investments in subsidiaries and associates (453,888,879 euros and 1,607,204,635 euros, respectively)

Refer to note 2.6., 2.7., 3.1.3., 3.1.4., 7. and 9. of the financial statements

The Risk	Our response to the identified risk
The recoverability of goodwill and investments in subsidiaries and associates was considered a key audit matter due to the materiality of the amounts involved and the complexity and subjectivity associated with impairment testing, namely due to the inherent uncertainty in financial projections, which are based on the expectations of the Board of Directors, materialised in business plans that rely on various assumptions, related to discount rates, market shares, projected margins, short-term and long-term growth rates, and investment plans, which are not observable in the market. Additionally, in the case of the investments indirectly held in two entities based in Angola, the subjectivity is further increased due to the existence of an uncertain economic context, and particularly in light of the lawsuit filed in 2020 by the Provincial Court of Luanda against the main shareholder of these entities, which resulted in part of his assets in Angola being seized, including his shares in these entities, and consequently, in January 2022, the Public Prosecutor's Office requested the replacement of the Boards of Directors of these entities by the Ministry of Telecommunications, Information Technologies, and Social Communication, as the custodians of the investments.	Our audit procedures included, amongst others, those that we describe below: ▪ We evaluated the design, implementation, and operating effectiveness of the key controls implemented by the Entity related to this matter and analysed the budgeting procedures on which the projections are based, by comparing current performance with estimates made in previous periods and assessing the integrity of the discounted cash flows model; ▪ We assessed, with the support of our specialists, the internal and external assumptions used and their reasonableness, such as current business trends, market performance, inflation, projected economic growth, and discount rates; ▪ We performed sensitivity analyses to assess the robustness of the assumptions and forecasts used; ▪ We involved our specialists in determining the weighted average cost of capital; ▪ We evaluated the methodology applied and the mathematical accuracy of the models; and, ▪ We assessed the adequacy of the respective disclosures to the financial statements, in accordance with the applicable accounting framework.

KPMG

Corporate reorganisation (capital gain of 198,180,144 euros)	
Refer to note 2.7., 9. and 30. of the financial statements	
The Risk	**Our response to the identified risk**
In October 2024, the corporate reorganisation that began in 2018 was completed, with the Group's businesses being concentrated in NOS Comunicações, S.A. (Telco), NOS Audiovisuais, SGPS, S.A. (Audiovisuals), and NOS Internacional, SGPS, S.A. (Internacional), which was achieved through the purchase and sale between companies within the NOS Group's consolidation perimeter of various interests held in subsidiaries and joint ventures. In the context of this corporate reorganisation, NOS, SGPS, S.A. sold its interests in NOS Inovação, S.A. and NOS Wholesale, S.A. to NOS Comunicações, S.A., its interests in NOS Audio - Sales and Distribution, S.A. and NOS Lusomundo Cinemas, S.A. to NOS Audiovisuais, SGPS, S.A., and its interests in Teliz Holding, S.A., MSTAR, S.A., and Upstar Comunicações S.A. to NOS Internacional, SGPS, S.A., resulting in a capital gain of 198,180,144 euros and the release of non-distributable reserves of 74,902,743 euros. This transaction was considered a key audit matter due to the material impact on the separate financial statements and the complexity and subjectivity associated with determining the fair value of the interests sold by NOS, SGPS, S.A., namely due to the uncertainty inherent in financial projections, which are based on the expectations of the Board of Directors, materialised in business plans that rely on various assumptions, related to discount rates, market shares, projected margins, short-term and long-term growth rates, and investment plans, which are not observable in the market.	Our audit procedures included, amongst others, those that we describe below: ▪ We evaluated the design, implementation, and operational effectiveness of the key controls implemented by the Entity related to this matter and analysed the budgeting procedures on which the projections are based, by comparing current performance with estimates made in previous periods and assessing the integrity of the discounted cash flows model; ▪ We obtained and analysed supporting documentation for the transactions; ▪ We assessed, with the support of our specialists, the internal and external assumptions used and their reasonableness, such as current business trends, market performance, inflation, projected economic growth, and discount rates; ▪ We performed sensitivity analyses to assess the robustness of the assumptions and forecasts used; ▪ We involved our specialists in determining the weighted average cost of capital; ▪ We evaluated the methodology applied and the mathematical accuracy of the models; ▪ We analysed the tax treatment followed by management, with the support of our tax specialists, and, ▪ We assessed the adequacy of the respective disclosures to the financial statements, in accordance with the applicable accounting framework.



Other matters

The financial statements for the year ended 31 December 2023, presented for comparative purposes, were audited by another statutory auditor, who issued a Statutory Auditors' Report and Auditor's Report, dated 5 March 2024. We were engaged on 12 April 2024 to perform an audit to the financial statements for the year starting on 1 January 2024.

Responsibilities of management and the supervisory body for the financial statements

Management is responsible for:

- the preparation of financial statements that give a true and fair view of the Entity's financial position, financial performance and the cash flows, in accordance with the International Financial Reporting Standards as adopted by the European Union;
- the preparation of the management report, the corporate governance report and the remunerations' report, in accordance with applicable laws and regulations;
- designing and maintaining an appropriate internal control system to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error;
- the adoption of accounting policies and principles appropriate in the circumstances; and,
- assessing the Entity's ability to continue as a going concern, and disclosing, as applicable, the matters that may cast significant doubt about the Entity's ability to continue as a going concern.

The supervisory body is responsible for overseeing the Entity's financial reporting process.

Auditors' responsibilities for the audit of the financial statements

Our responsibility is to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatements whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal control;
- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Entity's internal control;

- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management;
- conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Entity's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Entity to cease to continue as a going concern;
- evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and the events in a manner that achieves fair presentation;
- communicate with those charged with governance, including the supervisory body, regarding, among other matters, the planned scope and timing of the audit, and significant audit findings including any significant deficiencies in internal control that we identify during our audit;
- determine, from the matters communicated with those charged with governance, including the supervisory body, those matters that were of most significance in the audit of the financial statements of the current year and are therefore the key audit matters. We describe these matters in our auditors' report unless law or regulation precludes their public disclosure; and,
- provide the supervisory body with a statement that we have complied with the relevant ethical requirements regarding independence, and communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

Our responsibility also includes the verification that the information contained in the management report is consistent with the financial statements, and the verification of the requirements as provided in numbers 4 and 5 of article 451 of the Portuguese Companies' Code regarding the corporate governance report, as well as the verification that the remunerations report was presented.

REPORT ON OTHER LEGAL AND REGULATORY REQUIREMENTS

On the management report

Pursuant to article 451, nr. 3, al. (e) of the Portuguese Companies' Code, it is our opinion that the management report was prepared in accordance with the applicable legal and regulatory requirements, the information contained therein is coherent with the audited financial statements and, having regard to our knowledge and assessment of the Entity, we have not identified any material misstatements.

On the corporate governance report

Pursuant to article 451, nr. 4, of the Portuguese Companies' Code, it is our opinion that the corporate governance report includes the information required to the Entity to provide under article 29-H of the Securities Code, and we have not identified any material misstatements on the information provided therein in compliance with paragraphs c), d), f), h), i) and l) of nr. 1 of that article.

On the remunerations report

Pursuant to article 26-G, nr. 6, of the Securities Code, we inform that the Entity has included in the corporate governance report in a separate chapter the information defined in nr. 2 of that article.

On the European Single Electronic Format (ESEF)

The NOS, SGPS, S.A.'s financial statements for the year ended 31 December 2024 have to comply with the applicable requirements established by the Commission Delegated Regulation 2019/815 of 17 December 2018 (ESEF Regulation).

Management is responsible for the preparation and presentation of the annual report in accordance with the ESEF Regulation.

Our responsibility is to obtain reasonable assurance about whether the consolidated financial statements, included in the annual report, have been prepared in accordance with the requirements of the ESEF Regulation.

Our procedures considered the OROC (Portuguese Institute of Statutory Auditors) technical application guide on ESEF reporting and included obtaining an understanding of the financial reporting process, including the presentation of the annual report in a valid XHTML format.

In our opinion, the financial statements, included in the annual report, are presented, in all material respects, in accordance with the requirements established by the ESEF Regulation.

On the additional matters provided in article 10 of the Regulation (EU) nr. 537/2014

Pursuant to article 10 of the Regulation (EU) nr. 537/2014 of the European Parliament and of the Council, of 16 April 2014, and in addition to the key audit matters mentioned above, we also report the following:

- We were first appointed as auditors of the Entity in the shareholders general assembly held on 12 April 2024 for a first mandate from 2024 to 2027.
- Management as confirmed to us that they are not aware of any fraud or suspicion of fraud having occurred that has a material effect on the financial statements. In planning and executing our audit in accordance with ISAs we maintained professional skepticism, and we designed audit procedures to respond to the possibility of material misstatement in the financial statements due to fraud. As a result of our work, we have not identified any material misstatement of the financial statements due to fraud.
- We confirm that the audit opinion we issue is consistent with the additional report that we prepared and delivered to the supervisory body of the Entity on 21 February 2025.
- We declare that we have not provided any prohibited services as described in article 5 of the Regulation (EU) nr. 537/2014 of the European Parliament and of the Council, of 16 April 2014, and we have remained independent of the Entity in conducting the audit.

- We inform that, in addition to the audit, we provided to the Entity with the following services as permitted by law and regulations in force:
  - Limited review of the condensed consolidated financial statements of NOS, SGPS, S.A., for the three-month period ended 31 March 2024, six-month period ended 30 June 2024 and nine-month period ended 30 September 2024; and,
  - Limited assurance on the reliability of the sustainability information ("sustainability report") of NOS, SGPS, S.A. for the year ended 31 December 2024, prepared in accordance with the requirements of the "European Sustainability Reporting Standards" ("ESRS Standards"), included in the Management Report (under the non-financial statement chapter), and related to the disclosure requirements set out in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation), presented separately in the "sustainability report".

26 February 2025

SIGNED ON THE ORIGINAL

KPMG & Associados -
Sociedade de Revisores Oficiais de Contas, S.A.
(no. 189 and registered at CMVM with the no. 20161489)
represented by
Pedro Jorge Quental e Cruz
(ROC no. 1765 and registered at CMVM with the no. 20161607)

Statement Issued Under the Terms of Article 29-G, Paragraph 1, Sub Paragraph C, of the Portuguese Securities Code

In accordance with Article 29-G, paragraph 1, c), of the Portuguese Securities Code, the members of the Board of Directors of NOS, SGPS, S.A., whose names and roles are listed below, declare that, to the best of their knowledge:

a) The integrated management report, the annual individual and consolidated accounts, the legal certification of accounts and other accounting documents required by law or regulation, relative to the year ended on 31 December 2024 , were elaborated in compliance with the applicable accounting standards, giving an accurate and true view of the assets and liabilities, the Company's financial position and results, as well as those of the companies included in its consolidation perimeter;

b) The integrated management report faithfully portrays the evolution of the Company's business, performance and position, as well as those of the companies included in its consolidation perimeter and, where applicable, contains a description of the main risks and uncertainties they face.

Lisbon, 26 february 2025

The Board of Directors

Ângelo Paupério
Chairman of the Board of Directors

Miguel Almeida
Chief Executive Officer

José Koch Ferreira
Executive Director of the Board of Directors

Luís Nascimento
Executive Director of the Board of Directors

Jorge Graça
Executive Director of the Board of Directors

Manuel Ramalho Eanes
Executive Director of the Board of Directors

Filipa Santos Carvalho
Executive Director of the Board of Directors

Daniel Beato
Executive Director of the Board of Directors

Ana Rita Rodrigues
Member of the Board of Directors

António Lobo Xavier
Member of the Board of Directors

Catarina Tavira Van-Dúnem
Member of the Board of Directors

Cláudia Azevedo
Member of the Board of Directors

Cristina Marques
Member of the Board of Directors

João Torres Dolores
Member of the Board of Directors

Eduardo Verde Pinho
Member of the Board of Directors

Report and Opinion of the Statutory Independent Audit Board

Dear Shareholders,

According to the articles of association, the supervision of the Company is committed to a Statutory Independent Audit Board comprised of three full members and one alternate, elected by the General Meeting, as well as the Statutory Auditor or Firm of Chartered Accountants.

Accordingly, and under the terms of Article 420(1)(g) of the Companies Code, the Statutory Independent Audit Board presents its Report on the supervisory action it carried out, as well as its Opinion on the Individual and Consolidated Report and Accounts of NOS, SGPS, S.A. ('Company'), for the financial year ended 31 December 2024.

The Statutory Independent Audit Board regularly accompanied the evolution of the Company's activity and that of its main subsidiaries and monitored the compliance with the law and the articles of association, having supervised the Company's management, the effectiveness of the risk management, internal control and internal auditing systems and the preparation and disclosure of individual and consolidated financial information. It has also checked that the accounting records are in order, that the individual and consolidated financial statements are accurate and that the accounting policies and valuation criteria adopted by the Company are conducive to a proper understanding of the individual and consolidated assets and results, as well as the cash flows.

Within its powers, the Statutory Independent Audit Board met periodically with the Statutory Auditor/External Auditor ('Auditor') in order to monitor the audit work carried out by the latter and take note of its conclusions, overseeing its activity and respective independence and competence. It also met on a regular basis with the heads of the Internal Audit Department and Legal Department as well as with the Board Member responsible for financial and non-financial information and his team, and whenever it deemed it necessary and appropriate. The Statutory Independent Audit Board received full cooperation from all of them at all times.

The Statutory Independent Audit Board monitored the whistleblowing system. This system is available to all shareholders, employees and the general public. All the reports received were duly analysed.

As for the Corporate Governance Report, the Statutory Independent Audit Board checked that it included the elements referred to in article 29-H of the Portuguese Securities Code.

The Statutory Independent Audit Board also received a letter from the Auditor confirming his independence from the Company.

Accordingly, the following is issued:

OPINION

The Statutory Independent Audit Board has taken note of the conclusions of the audit and external audit work on the Individual and Consolidated Financial Statements for the financial year 2024, which comprise the Individual and Consolidated Statement of Financial Position as at 31 December 2024, the Individual and Consolidated Statement of Profit and Loss by Nature, the Individual and Consolidated Statement of Comprehensive Income, the Individual and Consolidated Statement of Changes in Equity, the Individual and Consolidated Statement of Cash Flows and the respective Appendices. The Statutory Independent Audit Board analysed the audit report on these documents, which expressed no reservations.

The Statutory Independent Audit Board also took note of the Auditor's report on the Consolidated Sustainability Report, which expressed no reservations.

Within the scope of the Supervisory Board's competences and in accordance with the provisions of Article 29-G(1)(c) of the Portuguese Securities Code, it is hereby declared that, to the best of this board's knowledge, the Integrated Management Report and the Company's Individual and Consolidated Financial Statements for the year ended 31 December 2024 were prepared in accordance with the applicable accounting standards, giving a true and fair view of the assets and liabilities, financial position and results of NOS, SGPS, S.A. and the companies included in the consolidation perimeter. In addition, the Integrated Management Report faithfully sets out the evolution of the business, performance and position of the Company and the Group, fulfils the applicable legal, accounting and statutory requirements and, whenever justified, contains a description of the main risks and uncertainties faced. It should also be noted that the non-financial statements, prepared in accordance with the requirements of the European Sustainability Reporting Standards (ESRS), contain relevant information that allows an understanding of the performance, position and impact of the Group's activities, regarding environmental, social and employee issues, gender equality, non-discrimination, respect for human rights, and governance issues, such as the fight against corruption and bribery, management of relations with suppliers, and good payment practices. Finally, it is also certified that the Corporate Governance Report, which is published at the same time as the Integrated Management Report, includes the elements referred to in article 29-H of the Portuguese Securities Code.

Accordingly, taking into account the due diligence carried out, the opinions and information received from the Board of Directors, the Company's departments and the Auditor, the Statutory Independent Audit Board is of the opinion that:

I. there are no obstacles to the approval of the Integrated Management Report for the financial year 2024;

II. there are no obstacles to the approval of the Individual Financial Statements and the Consolidated Financial Statements for the financial year 2024;

III. nothing prevents the approval of the proposal for the appropriation of profits presented by the Board of Directors, namely taking into account the provisions of article 32 of the Commercial Companies Code.

Lisbon, 26th February 2025

The Statutory Independent Audit Board

_____

José Pereira Alves

_____

Patrícia Teixeira Lopes

_____

Paulo Mota Pinto



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