

5M-979



Office of the Minnesota Secretary of State
Minnesota Public Benefit Corporation / Annual Benefit Report
Minnesota Statutes, Chapter 304A



Read the instructions before completing this form
Must be filed by March 31
Filing Fee: \$55 for expedited service in-person, \$35 if submitted by mail

The Annual Benefit Report covers the 12 month period ending on December 31 of the previous year.
Notice: Failure to file this form by March 31 of this year will result in the revocation of the corporation's public benefit status without further notice from the Secretary of State, pursuant to Minnesota Statutes, Section 304A.301

- 1. Corporate Name: (Required) Nova Group GBC
- 2. The public benefit corporation's board of directors has reviewed and approved this report.
- 3. In the field below, enter the information required by section 304A.301 subd. 2 or 3 for the period covered by this report, (see instructions for further information): Note: Use additional sheets if needed. (Required)

See attached exhibit

4. I, the undersigned, certify that I am the chief executive officer of this public benefit corporation. I further certify that I have signed this document no more than 30 days before the document is delivered to the secretary of state for filing, and that this document is current when signed. I further certify that I have completed all required fields, and that the information in this document is true and correct and in compliance with the applicable chapter of Minnesota Statutes. I understand that by signing this document I am subject to the penalties of perjury as set forth in Section 609.48 as if I had signed this document under oath.

Steven B. Cummings *lsj*

Signature of Public Benefit Corporation's Chief Executive Officer

3/31/21

Date (Must be dated within 30 days before the report is delivered to the Secretary of State for Filing)

Email Address for Official Notices

Enter an email address to which the Secretary of State can forward official notices required by law and other notices:

ben.bohline@novagroup.com

Check here to have your email address excluded from requests for bulk data, to the extent allowed by Minnesota law.

List a name and daytime phone number of a person who can be contacted about this form:

Ben Bohline

Contact Name

952.270.0566

Phone Number

Entities that own, lease, or have any financial interest in agricultural land or land capable of being farmed must register with the MN Dept. of Agriculture's Corporate Farm Program.

Does this entity own, lease, or have any financial interest in agricultural land or land capable of being farmed?

Yes No

Exhibit

Nova Group GBC – Annual Benefit Report

Nova Group GBC submits this Annual Report pursuant to Minnesota Statute Section 304A.301.

Nova Group GBC's Board of Directors has certified the choice of B Lab as its third-party standard. B Lab is an independent globally recognized third-party certifier of B Corporations and its Board of Directors has approved the report.

Nova Group GBC is an environmental consulting business. Most of our work is done to identify and remediate environmental risks and issues. With regard to this reporting period and period covered by the report, Nova Group, GBC identifies B Lab as the third-party standard determined by the board. With reference to the B Lab standard, Nova Group GBC identifies the following ways in which it has pursued the general public benefit:

1. Considering the social and environmental impact of its decision making;
2. General commitment to social or environmental responsibility (e.g. to conserve the environment);
3. A commitment to a specific positive social impact (e.g. poverty alleviation, sustainable economic development);
4. A commitment to a specific positive environmental impact (e.g. reducing waste sent to landfills through upcycled products);
5. A commitment to serve a target beneficiary group in need;
6. Employee training that includes social or environmental issues material to our company or its mission;
7. Manager roles with job descriptions that explicitly incorporate social and environmental performance;
8. Performance reviews consider social and environmental issues;
9. Executive team members required commitment to social and environmental performance;
10. Board of Directors review of social and environmental performance;
11. We measure our externalities in monetary terms and incorporate them into our financial balances;
12. Prohibition of bribes in any form, including kickbacks or gifts, on any portion of contract payments or soft dollar practices;
13. Formal oversight policy covering direct or indirect political contributions, charitable donations, and sponsorships;
14. Public disclosure of financial and in-kind contributions to political parties, politicians, lobby groups, charitable organizations, and advocacy groups;
15. Written employee whistle-blowing policy with confidentiality policy;
16. Circulation of whistle-blowing policy to all employees and business partners;

17. Communication of the anti-corruption system to the relevant internal and external stakeholders;
18. Training on the anti-corruption system;
19. Providing supporting tools and guidance (e.g. self-assessment survey for high-risk departments);
20. Provide the opportunity for anonymous mechanisms to report concerns and grievances;
21. IT systems have different password protection systems that are changed periodically with different access levels according to the position of the staff member accessing the data;
22. Fraud risk assessment is conducted at least annually, with any identified internal control deficiencies communicated to Board of Directors and senior management;
23. Lines of financial reporting, responsibilities, and limits for the authorization, approval, and verification of disbursements are all documented in writing;
24. Financial control activities are documented, and at a minimum, cover controls around cash disbursement, accounts receivable, accounts payable, and inventory management;
25. Employee wages that adjust to inflation and bonus and profit-sharing plan;
26. Partial match of employee retirement;
27. Direct deposit for wages;
28. Insurance benefits;
29. We have a formal onboarding process for new employees;
30. We offered ongoing training on core job responsibilities to employees within the last year;
31. We have a policy to encourage internal promotions and hiring for advanced positions (e.g. posting job openings internally first);
32. We provide cross-skills training for career advancements or transitions (e.g. management training for non-managers);
33. We facilitate or have an allocated budget for external professional development opportunities, (e.g. conference attendance, online trainings);
34. We provide reimbursements or programs for intensive continuing education credentials (e.g. college degrees, professional licensures);
35. Following a non-discrimination statement and policy;
36. Following an anti-harassment policy with reporting mechanisms, processes, and disciplinary procedures;
37. Policies on benefits, training and leave;
38. Grievance resolution process;
39. Flex time and accommodation for employees;
40. Facilities designed to meet accessibility requirements;
41. We anonymously survey employees on gender identity, race/ethnicity, disability status, and other demographic factors to track the diversity of our workforce;
42. We have a formal statement on the intended social or environmental impact of our company's philanthropy;
43. We match individual workers' charitable donations;
44. Compliance with all local laws and regulations;
45. Compliance with international human rights and labor standards (for employees and contractors);

46. Payment at or above industry benchmarks;
47. Payment of a living wage (for employees and contractors);
48. Payment at or above industry benchmarks;
49. Payment of a living wage (for employees and contractors);
50. Our company shares resources with employees regarding environmental stewardship in home offices (e.g. energy efficiency);
51. We have a policy in place for the safe disposal of e-waste and other hazardous materials purchased for employee home offices;
52. Employees are provided with a list of environmentally-preferred vendors for office supplies;
53. The Company has formal policies to review the accuracy and ethics of marketing and advertising;
54. Company complies with independent marketing and advertising standards relevant to their sector or industry;
55. Company has programs in place to promote social and or environmental causes through its marketing and advertising; and
56. Compliance and education about COVID-19 in accordance with available legal guidance.

Nova strives to continue to improve its B Impact Assessment score which measures Nova's tangible progress in the following areas: Governance, Workers, Community, Environment and Customers.

In addition to the above, the corporation has created general public benefit public benefit in several ways: commitment to perform all due-diligence assessments on a carbon neutral basis, enacted employee centric policies that encourage employees to engage/volunteer in their local communities.

There are no circumstances that hindered efforts to pursue or create general public benefit. B Lab's third-party standard is being applied in a manner consistent with the third-party standard's application in the prior reports. Nova has completed the same B Lab questionnaire and understands the standard remains consistent.

Respectfully,

/s/ Steven B. Cummings 3/31/21

Steven B. Cummings
Nova Group, GBC
Chief Executive Officer

This document has been reviewed and approved by the Board of Directors of Nova Group, GBC.

March 31, 2021



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OFFICE OF THE SECRETARY OF STATE
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04/19/2021 11:59 PM

Steve Simon

Steve Simon
Secretary of State