

CODE OF ETHICS

Supernova Technology AB
HR-avdelningen
Helsingborg

1 Code of ethics and business conduct

for employees, managers and directors of Supernova Technology

Definitions

In this document **Supernova Technology AB** is referred to as ***Supernova*** and ***Supernova Technology*** and ***company***. **Code of ethics and business conduct** is referred to as ***code***.

To the Supernova team

This Code of ethics and business conduct is based on the values and philosophy that have guided Supernova successfully since the company's inception in 2019. It constitutes a unique repository where the combination of Supernova policies, guidelines, principles of conduct and best practices have been regrouped under one umbrella document, for the benefit of our employees, managers and directors.

Supernova's operations have grown significantly and now extend worldwide, and our business environment has become increasingly competitive and complex. The scope and pace of our business requires us to make quick and informed decisions, in a manner consistent with our values.

This code provides guidance - and a global view - for Supernova employees, managers and directors to consistently achieve the professionalism that has earned our company an enviable reputation among our clients and within our industry. It also provides guidance for Supernova directors when acting for the company.

This code is not meant to be a complete list of ethics and business conduct covering every eventuality. It highlights situations that Supernova's employees, managers and directors may face in their duties and provides the basic principles to guide their actions. Supernova recognizes the importance of supporting these individuals as ethical issues arise, and has an open door policy for resolving such issues with integrity.

Upon joining Supernova, all employees, as part of their employment contract, undertake to observe this code in all aspects of their work. Furthermore, annually, all members shall renew such undertaking.

We must always behave responsibly and in line with the company's core values when working on behalf of Supernova for its clients and other stakeholders. By preserving our personal integrity and the professional reputation of Supernova, I am confident that together we will succeed in achieving the company's mission and vision.

Ahmed Shakir
Founder and CEO

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1.1. VALUES, PHILOSOPHY, VISION AND MISSION

Values

Supernova has always believed in investing in the future to ensure continued success. From the beginning, the company has invested in developing a strong corporate culture, based on six core values that reflect its approach to business. These values are: quality and partnership, entrepreneurship and sharing, respect, objectivity and integrity, financial strength and corporate social responsibility. These values are at the heart of Supernova's success. They ensure that Supernova takes a long-term view on business issues, and builds long-lasting partnerships with its clients.

Philosophy

The success of Supernova Technology and its subsidiaries is based on the knowledge, creativity and commitment of its employees. Supernova ensures this success by recruiting the most qualified people available. Supernova's employees share in the risks and rewards of Supernova's business as partners of Supernova and are committed to its objectives. They take a disciplined approach to their work and constantly strive for excellence to achieve the best results for every client. In exchange, Supernova strives to recognize the value of its employees by offering them a stimulating work environment that fosters their personal and professional development.

Vision

The company's vision is to digitize Sweden by developing smart solutions in various areas where there is a great need. At the same time run computer consulting business and provide the market with experts in software development. There is a great demand for competent developers at the same time as the supply of experienced software developers is extremely small. Our goal is to fill the gap.

Mission

To help our clients succeed through outstanding quality, competence and objectivity, providing thought leadership and delivering the best services and solutions to fully satisfy client objectives in information technology, business processes and management.

In all we do, we foster a culture of partnership, entrepreneurship, teamwork and integrity, building a global world class information technology and business process services company.

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1.2. PURPOSE AND SCOPE OF THE CODE

This code of ethics and business conduct (the "code") defines Supernova's character and guides the actions and decisions of the salaried employees, managers and directors of Supernova. Compliance with the code is essential for many reasons and notably to preserve and enhance Supernova's reputation and maximize shareholder value. In keeping with Supernova's values, the Code outlines the essential rules and guidelines necessary to preserve Supernova's enviable reputation among its clients and within its industry. The Code is not meant to be a complete list of ethics and business conduct covering every eventuality. It highlights situations that Supernova members, officers and directors may face in their duties. The code is meant to give them a broad and clear understanding of the conduct expected of them, wherever Supernova does business. While the specific illustrations are primarily addressed to members, they should be read as being equally applicable to the members of Supernova's Board of Directors to the extent that they may be applicable in the circumstances.

Should a member be confronted with a situation where further guidance is required, the matter should be discussed with the member's manager. Supernova recognizes its obligation to support its members, officers and directors as ethical issues arise.

1.3. MEMBER'S CONDUCT AND BEHAVIOR

General conduct

Upon joining Supernova and annually thereafter, all members are by virtue of the "Member Commitment to the Code of Ethics and Business Conduct", which must be signed where permitted locally, subject to the Company Code of Ethics and Business Conduct and related policies and guidelines.

If a member ceases to be employed by Supernova for any reason, the Member Commitment specifies which elements continue to apply, namely those related to the confidentiality obligations.

Respect and integrity

All members of Supernova support the Company's philosophy and contribute to Supernova's development and good reputation by promoting synergy and teamwork, by expressing their ideas and by adopting the highest standards of service quality and integrity. The members of Supernova are its ambassadors. They must always behave responsibly and demonstrate courtesy, honesty, civility and respect for other members of Supernova, for its clients and for its suppliers, and must never do anything that could harm Supernova's reputation or that could otherwise bring Supernova into disrepute.

Loyalty

Employees are expected to act at all times with diligence and loyalty towards Supernova Technology and in such a way as to safeguard Supernova's interests. Employees should not act in a way or publicly hold a position that might harm the image or reputation of Supernova Technology.

Relations with clients

Supernova's services often involve visiting or working at a client's place of business. An employee working at a client's site must comply with the client's practices and procedures and treat the client's facilities with respect. The employee must work as efficiently and meticulously as possible and leave the client's premises and property as he or she found them. As well, employees must use the client's information and systems infrastructures for the sole purpose of the client's contract and protect those infrastructures and information at all times.

Relations with competitors

If an employee is working with a competitor of Supernova on a joint project for a client, the employee must avoid any situations that could cause conflicts. The employee must respect the roles that the client has assigned to each party and work as a team in the client's best interests. Supernova's employees also have both an ethical and a legal responsibility to portray the company's competitors fairly and accurately. Supernova does not tolerate its employees using improper means for gathering information about its competitors.

Maintenance of assets

All employees of Supernova have a responsibility to protect Supernova's assets against loss, theft, abuse and unauthorized use or disposal. If, in the course of his or her work, an employee of Supernova is supplied with any property belonging to Supernova Technology or to a third party, the employee must use said property in accordance with Supernova's security and acceptable use policy, and as may otherwise be specified in the binding agreement he or she signed with Supernova the employee must use said property solely for work-related purposes as specified in the binding agreement he or she signed upon joining Supernova. More specifically, the employees must use Supernova's systems infrastructures in a manner consistent with legal requirements, professional ethics, the policies established by the administrators of Supernova's network and of any external networks that the employee uses, and must respect the copyrights protecting any software that the employee also uses. As well, employees must never use the clients' systems infrastructures, including the clients' software, for any purpose that is not work-related. Supernova applies a zero-tolerance policy to any abuse of its systems infrastructures or those of its clients.

At the end of employment, employees are required to return all Supernova property and assets in their possession to their manager or to a designated Supernova representative.

Health and Safety

Supernova Technology is committed to providing a safe and healthy work environment for all employees. Accordingly, employees are expected to observe the following rules:

Drug-Free workplace

Supernova maintains a drug-free workplace. Accordingly, in the workplace, employees may not:

- Use, sell, or possess illegal drugs;
- Abuse or misuse controlled substances, prescription drugs, or over-the-counter medications; or
- Abuse alcohol.

Alcohol-free workplace

No employee may consume, serve, or be under the influence of alcohol while on Supernova property or while performing Supernova business.

Alcohol may be served at Supernova functions only with the prior approval of CEO. In such circumstances, Supernova strongly encourages employees to use discretion, act responsibly, and behave in a manner becoming to the company. When working in parts of the world where alcohol use or possession is prohibited, Supernova employees must comply with local laws.

1.4. INTEGRITY OF BOOKS AND RECORDS AND COMPLIANCE WITH SOUND ACCOUNTING PRACTICES

Preparation of books and records

Accuracy and reliability in the preparation of all business records is of critical importance to the decision-making process and to the proper discharge of financial, legal and reporting obligations. All business records, expense accounts, invoices, bills, payroll and employee records and other reports are to be prepared with care and honesty. False or misleading entries are not permitted in Supernova's books and records.

Financial transactions

All financial transactions are to be properly recorded in the books of account and accounting procedures are to be supported by the necessary internal controls. In turn, all books and records of Supernova must be available for audit.

In relation to Supernova's books and records, employees must:

- not intentionally cause Company documents to be incorrect in any way;
- not create or participate in the creation of any records that are intended to conceal anything that is improper;
- properly and promptly record all disbursements of funds;
- co-operate with internal and external auditors;
- report any knowledge of any untruthful or inaccurate statements or records or transactions that do not seem to serve a legitimate commercial purpose; and
- not make unusual financial arrangements with a client or a supplier (such as, over-invoicing or under-invoicing) for payments on their behalf to a party not related to the transaction.

The nature of Supernova’s business places special importance on the accuracy of time keeping and expense reporting.

Accurate Timekeeping

Client billing, employee compensation, and cost estimating depends on Supernova’s ability to record and account for employee time worked accurately. Accordingly, Supernova is committed to accurate total time accounting and reporting within all of its subsidiaries.

All employees are required to comply with Supernova’s timekeeping policy and procedures and any applicable contract requirements. Employees must record all time worked daily and submit reports weekly, accurately reflecting all time worked on both direct and indirect projects. Managers are responsible for ensuring that employees know the correct project code for each project assignment.

Knowingly mischarging your time or falsifying time records violates Supernova policy and may also violate the law. No employee may knowingly charge time inaccurately or knowingly approve mischarging. Similarly, shifting time worked on one project to another project also is strictly prohibited.

To ensure accurate time reporting, employees must be sure that they understand and carefully follow Supernova’s timekeeping policy and procedures. Employees must obtain the correct charge code before starting work on any new direct or indirect project. If an employee has any questions regarding time charging, the question should be raised with their manager. In all cases, employees must take the steps necessary to ensure that their time records are current, accurate, and complete.

Expense Reimbursement

Employees must honestly and accurately report their business-related expenses for reimbursement. An employee's signature on an expense report certifies that the information provided is complete and accurate and represents a valid business expense.

Breaches

Suspected breaches of the code which directly or indirectly affect Supernova's business must be reported to the Chief Financial Officer, the Chief Executive Officer or the Chief Legal Officer.

In addition, Supernova has established a "whistleblower policy" for incident reporting, the ethics reporting policy, as well as a process under that policy which allows any person who has direct knowledge of specific facts to report incidents where the company is exposed to a serious risk in matters of accounting, auditing, internal accounting controls, finance, banking or financial corruption. The process in place protects the incident reporter and ensures the confidentiality of the report. See the heading "Compliance with the code" below.

1.5. CONFIDENTIAL INFORMATION, INTELLECTUAL PROPERTY AND PRIVACY

Definitions

Confidential information

"Confidential information" means information about the company's business dealings, development strategies and financial results; products or processes; client lists; vendor lists or purchase prices; cost, pricing, marketing or service strategies; results of research and development work, technical know-how, manufacturing processes, computer software; reports and information related to mergers, acquisitions and divestitures. "Confidential information" also includes information that relates to intellectual property and may include, but is not limited to: business strategies, product marketing and costing information and information provided by suppliers and competitors. In addition, the way the company puts publicly-known information together, to achieve a particular result, is often a valuable trade secret.

The following information and documents constitute confidential information or documents of Supernova or its clients, as the case may be:

- methodologies
- all information related to: processes, formulas, research and development, products, financials, marketing; names and lists of customers, employees and suppliers as well as related data; computer programs, all software developed or to be developed including flow charts, source and object codes
- all information related to projects undertaken by the company whether they are merger and acquisition or divestiture projects or projects related to large client contracts, including all information obtained in due diligence initiatives, whether such information pertains to Supernova or to any third party
- all other information or documents that, if disclosed, could be prejudicial to Supernova or its clients.

Intellectual Property

"Intellectual Property" (IP) means patents, copyrights, trademarks, trade secrets and industrial designs of Supernova.

Non-disclosure undertaking

Supernova confidential information

During the normal course of business, employees will have access to confidential information about Supernova. In some cases, the information may affect the value of Supernova shares. Each employee must protect the confidentiality of all confidential Supernova information and documents. Employees cannot discuss them away from work, and cannot divulge any confidential Supernova information or any information that could harm Supernova. Confidential Supernova information could include information from other employees or information acquired from outside sources, sometimes under obligations of secrecy. Employees are expected to use such information exclusively for business purposes and this information must not be disclosed externally, including to a spouse, partner or relative, without the approval of an employee's manager.

Third party agreements

In cases where information or records are obtained under an agreement with a third party, such as software licenses or technology purchases, employees must ensure that the provisions of such agreements are strictly adhered to so that Supernova will not be deemed to be in default. Unauthorized disclosure or use of information or records associated with these agreements could expose the employees involved and/or Supernova to serious consequences.

Disclosure policy

Privileged or material information

Privileged or material undisclosed information about Supernova or other public companies may not be used as a basis for trading in Supernova securities, or the securities of any other company in respect of which Supernova or its employees, consultants or advisers are in possession of such information. For this purpose, Supernova has an established policy regarding the use of insider information and trading in securities. This policy is entitled "Insider Trading and Blackout Periods Policy" which extends to all employees, managers and directors. The Insider Trading and Blackout Periods Policy is designed to prevent improper trading in the securities of the company and the improper communication of privileged or material undisclosed information. In addition, this policy is aimed at preventing employees, managers and directors from engaging in activities that, although not illegal, may expose them or the company to potential reputational risk.

Supernova's "Policy on Timely Disclosure of Material Information" cover the disclosure of information with a material impact, defined as any information that, if disclosed to a potential investor, could affect his or her perception of the value of the company as an investment. Because Supernova may become a publicly traded company, any information that may have a material impact on Supernova's results or on the perception of the value of the stock must be communicated in accordance with Supernova's "Policy on Timely Disclosure of Material Information”. If an employee thinks that he or she is in possession of a piece of information that is not known to management and may have a material impact on the company, the employee must communicate it immediately to either the Executive Chairman of the Board, the Chief Executive Officer, the Chief Legal Officer, or the Chief Financial Officer, without divulging it to anyone else.

Client information

Just as Supernova's employees must protect confidential information about Supernova, they must also show discretion at all times with regard to the client's business affairs. Unless an employee has the client's express authorization, he or she should never reveal any information that could harm the client's interests and should never use any information that he or she obtains in the course of a project or assignment for any purpose other than that project or assignment. If the client restricts the distribution of certain information within its own organization, the employee must comply with those restrictions as well.

Employee information

Subject to applicable law, Supernova collects and maintains personal information relating to its employees, including medical and benefits information. Access to such information is restricted to Supernova personnel on a need-to-know basis. They must ensure that this information is not disclosed in violation of

Supernova's policies and practices. Personal information is released to outside parties only with the employee's approval, except to satisfy the requirements considered by Supernova to be appropriate for legal reasons.

Intellectual Property

In the course of their duties, employees may develop or create new designs, inventions, systems or processes, products or documents. When these achievements have been made as a direct result of a employee's employment with the company and through use of Supernova's resources, they belong to Supernova Technology. Moreover, Supernova is free to use this work as it so wishes and employees cannot use nor divulge, publish or otherwise disseminate it without prior written consent from Supernova. Upon request, employees will execute documents made necessary to confirm or complete the assignment of rights to Supernova.

Suppliers and partners information

All information on Supernova suppliers and partners is also confidential and must not be disclosed without the express consent of the persons concerned.

Privacy

Supernova must comply with industry practices and applicable laws when processing the personal data of clients, employees and third parties. Therefore, any employee who processes personal data may only do so in accordance with Supernova’s privacy policies and processes.

1.6. CONFLICTS OF INTEREST

Definitions

The employees of Supernova must avoid any actual or apparent conflicts of interest and should never engage in any conduct which is, or could potentially be, harmful to Supernova or its reputation. A conflict of interest exists when an employee favours his or her personal interests over those of Supernova or its clients or when an obligation or situation arising from a employee's personal activities or financial affairs may adversely influence the employee's judgement in the performance of his or her duties at Supernova.

Particular caution should be taken when dealing with initiatives involving contracts with any governmental or quasi-governmental agency.

Guidelines

The following guidelines provide guidance for employees to avoid situations which are or may appear to be in conflict with their responsibility to act in the best interest of the company.

Financial interests - A conflict of interest exists when an employee who is able to influence business with Supernova (or family or a close personal friend of such employee) owns, directly or indirectly, a beneficial interest in an organization which is a competitor of Supernova, or which has current or prospective business as a supplier, customer or contractor with Supernova. This does not include the situation where the financial interest in question consists of shares, bonds or other securities of a company listed on a securities exchange and where the amount of this interest is less than one percent of the value of the class of security involved.

Outside work - When an employee, directly or indirectly, acts as a director, manager, employee, consultant or agent of an organization that is a competitor of Supernova, or which has current or prospective business as a supplier, customer or contractor with Supernova, there is a conflict of interest. Similarly, a conflict of interest may exist when an employee undertakes to engage in an independent business venture or to perform work or services for another entity should that activity prevent such employee from devoting the time and effort to the conduct of Supernova's business, which his or her position requires.

Gifts or favours - A conflict of interest will arise when n employee, either directly or indirectly, solicits or accepts any gift or favor from any person or organization which is a competitor of Supernova, or which has current or prospective business with Supernova as a customer, supplier, partner or contractor. For this purpose, a "gift" or "favor" includes any gratuitous service, loan, discount, money or article of value. It does not include articles of nominal value normally used for sales promotion purposes, ordinary and reasonable business meals and entertainment expenses if they have a clear business purpose, are permitted under the anti-corruption laws and local laws, conform to generally accepted local customs and are received in a sporadic manner.

Commissions - Supernova or its employees will never accept any commissions from a third-party vendor when recommending software, hardware or any equipment to a client as part of a service agreement.

Trading with Supernova - A conflict of interest may exist when an employee is directly or indirectly a party to a transaction with Supernova.

Misappropriation of business opportunities - A conflict of interest will exist when an employee, without the knowledge and consent of Supernova, appropriates for his or her own use, or that of another person or organization, the benefit of any business venture, opportunity or potential opportunity about which the employee may have learned or that he or she may have developed during the course of his or her employment.

Bribes - Neither Supernova nor its employees will pay bribes to clients or client representatives to obtain business from them. Refer to Supernova’s anti-corruption policy under Section 4.3 below for further information on this topic.

Former employees of customers – Hiring or retaining the services of former employees of customers, whether in the private or public sector (including quasi-government agencies), may result in actual or perceived conflicts of interest. Accordingly, any such person may not: (i) for a period of two years from the termination of his or her employment with a former customer be assigned to work on, or in any way contribute to, a Supernova project or contract that is linked to his or her former functions, unless the customer’s prior written consent is obtained and the hire is not prohibited by any code of ethics or other restrictions or undertakings applicable to such person; and (ii) disclose to any Supernova employee any confidential information such person obtained during the course of his or her former functions with the customer.

Personal relationships – The potential for a conflict, or perceived conflict, between personal/family relationships and work responsibilities may arise, for example, where an employee interacts with someone in a professional capacity in the course of Supernova’s business dealings with whom the employee shares a close personal relationship or friendship. It may also arise if an employee has a direct influence in deciding whether Supernova will engage in business dealings with a person, supplier or third party with whom the employee shares a close personal relationship or friendship. If the close personal relationship or friendship may be perceived as adversely affecting the employee’s judgment or objectivity, both in the workplace and in any business dealings, a conflict or perceived conflict exists.

Reporting

Any actual, potential or perceived conflict of interest situation must be discussed with the employee's manager (or, in the case of an manager, with either Supernova's Executive Chairman of the Board, Chief Executive Officer, Chief Financial Officer or Chief Legal Officer) as soon as possible so that steps can be taken to address the situation.

1.7. LAWS, STATUTES AND REGULATIONS

Compliance with the law

It is Supernova's policy to comply, not merely with the letter, but also with the spirit of the law. Supernova is required to maintain compliance with various acts, statutes and regulations governing activities in the jurisdictions in which it carries on business and expects employees acting on its behalf to do likewise. Employees are also expected to report any situation of concern to **hr@supernovait.se** or to the Supernova Legal Department.

Guidelines for compliance

This code does not seek to provide legal guidance for all laws, statutes and regulations that impact Supernova's activities. Specialized resources - legal, tax, environmental, government relations, personnel - are available within Supernova for that purpose. There are, however, several items of legislation that warrant specific mention. These are listed below along with some general guidelines for compliance.

Health and safety laws

Supernova is committed to creating and maintaining healthy and safe workplaces for its employees. Employees are expected to comply with all safety laws, regulations and directives from their managers (which may not necessarily be a law or regulation).

Environmental laws

Supernova is committed to preserving and enhancing the environment in the communities where its various businesses operate through responsible and environmentally-oriented operating practices. Employees are encouraged to participate in undertakings geared to improving the environment in both their workplace and their community.

Human rights legislation

Every person has the right to equal treatment with respect to employment and the right to be free of discrimination because of race, ancestry, place of origin, color, ethnic origin, citizenship, religion, sex, sexual orientation, age, pregnancy, record of offenses, marital status, social conditions, political beliefs, language, family status, disability or means used to overcome a disability. The following are Supernova's policies on equal employment opportunity, anti-discrimination and anti-harassment as well as the procedure for reporting any breach or violation of these policies:

- **Equal employment opportunity** - Supernova is committed to treating all people fairly and equitably, without discrimination. The company has established a program to ensure that groups which are often subject to discrimination are equitably represented within Supernova and to eliminate any employment rules and practices that could be discriminatory. Supernova regards diversity among its employees as a priceless resource and one which enables the company to work harmoniously with clients from around the world.
- **Anti-harassment and anti-discrimination policies** - Supernova recognizes that everyone has the right to work in an environment free of sexual, psychological and racial harassment. Supernova will do everything in its power to prevent its employees from becoming victims of such harassment. Supernova defines sexual, psychological or racial harassment as any behavior, in the form of words, gestures, or actions, generally repeated, that has undesired sexual, psychological or racial connotations, that has a negative impact on a person's dignity or physical or psychological integrity, or that results in that person being subjected to unfavorable working conditions or dismissal. Supernova will prevent any form of harassment or discrimination against job candidates and employees on any of the grounds mentioned above, whether during the hiring process or during employment. This commitment applies to such areas as training, performance assessment, promotions, transfers, layoffs, remuneration and all other employment practices and working

conditions.
All Supernova managers are personally accountable for enforcing this policy and must make every effort to prevent discriminatory or harassing behavior and to intervene immediately if they observe a problem or if a problem is reported to them.
In their professional capacity, all employees must refrain from any form of harassment or discrimination against anyone, including suppliers, customers and constructors.

- **Procedure for reporting discrimination or harassment** - Any employee of Supernova who feels discriminated against or harassed can and should, in all confidence and without fear of reprisal, personally report the facts to the CEO or manager of his or her business unit and to the human resources leader either in that business unit, in the country or at the corporate head office. The facts will be examined carefully by these two individuals. Neither the name of the person reporting the facts nor the circumstances surrounding them will be disclosed to anyone whatsoever, unless such disclosure is necessary for an investigation or disciplinary action. Any disciplinary action will be determined by these same two people and will be proportional to the seriousness of the behavior concerned. Supernova will also provide appropriate assistance to any employee who is a victim of discrimination or harassment. In addition, retaliation against persons who make complaints of harassment, witness harassment, offer testimony or are otherwise involved in the investigation of harassment complaints will not be tolerated.

Competition

Competition act

Supernova is required to make its own decisions on the basis of its best interest and must do so independent of agreements or understandings with competitors. The competition legislation prohibit certain arrangements or agreements with others regarding product prices, terms of sale, division of markets, allocation of customers or other practices that restrain competition. It is the responsibility of each manager to comply with the letter and spirit of all competition laws as they apply to Supernova.

Prohibition of competition

Employees have a duty of loyalty to Supernova as an employer. An employee may not conduct competing activities during the period of employment or utilize knowledge of the company during the period of employment as well as after the termination of employment.

Questions concerning competition-sensitive issues must be addressed to **hr@supernovait.se** or the Supernova Legal Department.

Securities laws and insider trading

Employees are prohibited from trading in Supernova securities while in possession of privileged information, subject to the limited exceptions under applicable laws and regulations. They are also prohibited from trading in another public company's securities while in possession of privileged information regarding that public company gained during the course of the employee's work. Empoyees are prohibited from disclosing privileged information to, or "tipping", another party or recommending that another party trade in Supernova securities or another public company's securities while they have knowledge of privileged information. Tipping is a violation of laws and regulations even if the person disclosing the information does not personally make a trade or otherwise benefit from disclosing the information.

"Privileged information" is information that has not been disclosed to the public and could affect the decision of a reasonable investor, as well as any fact or any change in business, operations or capital that would reasonably be expected to have a significant effect on the market price or value of any security and which has not been generally disclosed. Supernova has adopted the "Insider Trading and Blackout Periods Policy" which extends to all employees, managers and directors.

Export and import laws

Supernova employees may find themselves dealing with goods or services that are the subject of export or import restrictions, such as, for example, information or technology that has military or state security applications. Employees who deal with controlled goods and services must comply with the Supernova policies and procedures that are designed to ensure that the controls are respected.

Laws that protect classified information

In the normal course of Supernova's business with government clients, our employees may be required to hold government security clearances and they may have access to information that is classified or facilities that are restricted. Employees must comply with the letter and with the spirit of the laws, rules and regulations that apply to classified information and facilities that are restricted.

Whether an employee holds a security clearance or not, employees must not seek access to classified information or restricted facilities unless that access is required in order to allow them to carry out their assigned tasks. Employees must not accept access to, retain, or otherwise deal with classified information, or enter restricted facilities, unless they hold a current and valid security clearance that entitles them to have the appropriate degree of access. If there is any doubt about whether information is classified or whether facilities are restricted, about the restrictions that may apply to information or facilities, or whether the employee's security clearance is adequate in the circumstances, the employee must first consult with the Supernova security officer who has the authority to advise the employee.

1.8. INVESTOR AND MEDIA RELATIONS

Authorized Spokespersons

Initiatives relating to investor and media communications are the responsibility of Supernova's authorized spokespersons. Therefore, employees are not allowed to make any public statement about Supernova without first obtaining the authorization of such authorized spokespersons.

1.9. COMMUNITY ACTIVITIES AND POLITICAL AND PUBLIC CONTRIBUTIONS

As a future global organization conducting business throughout the world, Supernova is committed to the charitable donation of funds and services for humanitarian and other social needs, particularly in cases of emergencies or disasters. Monetary and other contributions to charities, social projects and funds, including schools, educational funds and infrastructure projects, should occur outside of work hours and be handled with caution as they can be conduits for corrupt payments. In order to minimize this risk, Supernova requires appropriate due diligence be conducted into such charities and projects prior to the approval of any charitable contributions made on its behalf. No contributions of any kind may be made on Supernova's behalf to any political party, candidate or campaign. In no event shall any charitable or political donations be made for the purpose of gaining any improper business advantage.

Questions to consider when making charitable payments:

1. Is the organization or body receiving the payment duly registered and does it otherwise comply with applicable law?
2. Is the organization or body, including its board of directors and other representatives, free of any political or other undue influence?
3. What is the purpose of the payment?
4. Is the payment consistent with Supernova's internal guidelines on charitable giving?
5. Is the payment at the request of a foreign official?

6. Is a foreign official associated with the charity and, if so, can the foreign official make decisions regarding Supernova's business in that country?
7. Is the payment conditioned on receiving business or other benefits?

1.10. COMPLIANCE WITH THE CODE

Management responsibilities

Supernova's managers have a special duty to be role models of appropriate business conduct and to see that the principles and policies of this code and of other Supernova guidelines and policies referred to in this code are upheld. This means:

- **Copy of the code** - Ensuring that all employees have a copy of the code, and that they understand and comply with its provisions.
- **Assistance** - Offering assistance and explanations to any employee who has questions, doubts or is in a difficult situation. Managers are also required to counsel employees promptly when their conduct or behavior is inconsistent with the code.
- **Enforcement** - Taking prompt and decisive action when a violation of the code has occurred, in consultation with the Supernova Legal Department. If a manager knows an employee is contemplating a prohibited action and does nothing, the manager will be held responsible along with the employee.

Employee responsibilities

Each employee is accountable for observing the rules of conduct that are normally accepted as standard in a business enterprise. In addition they must abide by the following:

- **Compliance** - Supernova's employees are expected to comply with the code and all policies and procedures of the company as well as to actively promote and support Supernova's values.
- **Preventing** - Employees should take all necessary steps to prevent a code violation.
- **Reporting** - Subject to applicable law, employees must immediately report to their manager (i) situations of non-compliance with respect to this code of which they become aware and (ii) suspected violations of the code. All information will, to the extent possible, be received in confidence. It is corporate policy not to take action against an employee who reports in good faith unless unusual circumstances warrant such action.

In addition, Supernova has established the ethics reporting policy as well as a process under that policy which allows any person who has direct knowledge of specific facts to report incidents in which the company is exposed to a serious risk in matters of accounting, auditing, internal accounting controls, finance, banking or financial corruption. The process in place protects the incident reporter and ensures the confidentiality of the report.

Incident reports may be submitted either by telephone by dialing (+46) 0760-206 306, or by submitting an incident report online. For those who wish to submit incident reports online, a link to the incident reporting web site is provided on Supernova's Enterprise Portal or members may access the incident reporting system directly at **www.supernova.se/reports/incident** or such other site as is communicated by Supernova from time to time.

Supernova's incident reporting system is managed by Supernova's authorized personnel which has undertaken to ensure the confidentiality of all incident reporters as well as the confidentiality of the reports they submit.



Supernova’s ethics reporting policy is available on the Supernova Enterprise Portal.

Consequences - Unethical behavior, violations of this code and of Supernova's other guidelines and policies, as well as withholding information during the course of an investigation regarding a possible violation of the code, may result in disciplinary action which will be commensurate with the seriousness of the behavior. Such action could include termination as well as civil or criminal action.

1.11. ADMINISTRATION OF THE CODE

Periodic review

Responsibility for the periodic review and revision of the code lies with Supernova's Corporate Governance Committee.

Monitoring compliance

The Board of Directors of Supernova will monitor compliance with the code and will be responsible for the granting of any waivers from compliance with the code for directors and managers of Supernova. The Corporate Secretary of Supernova shall, when deemed appropriate, make reports to the Board of Directors of Supernova with respect to compliance with this code.

Questions

Questions concerning this code should be referred to an employee's manager who, when warranted, shall report to Supernova's Corporate Secretary.

2. Executive code of conduct

This **Executive code of conduct** (the "***code***") is part of the commitment of **Supernova Technology AB** ("***Supernova***") to ethical business conduct and practices. This code reflects Supernova's firm commitment, not only to adherence to the law, but also to the highest standards of ethical conduct.

This code specifically covers Supernova's principal executive officer, principal financial officer, principal accounting officer or controller, or other persons performing similar functions (collectively, the "officers") and supplements the code of ethics and business conduct.

2.1. HONEST AND ETHICAL CONDUCT

Respect and integrity

The officers of Supernova are its ambassadors. They must always behave responsibly and demonstrate courtesy, honesty, civility and respect for all other employees of Supernova, for its clients and for its suppliers.

Ethics

Supporting Supernova's objectives, officers in performing their duties will carry out their responsibilities at all times in a way that promotes ethics in their leadership. The officers will:

- Undertake their responsibilities in a vigilant manner in the interests of Supernova and to avoid any real or perceived impression of personal advantage
- Advance Supernova's legitimate interests when the opportunity arises at all times ahead of their own interests
- Proactively promote ethical behavior among subordinates and peers
- Use corporate assets and resources in a responsible and fair manner, having regard for the interests of Supernova

2.2. FULL, FAIR, ACCURATE, TIMELY AND UNDERSTANDABLE DISCLOSURE

Annual and quarterly reports

Each officer shall read each annual or quarterly report filed or submitted under the applicable securities laws and satisfy himself or herself that the report does not contain any untrue statement of a material fact or omit to state a material fact that is necessary in order for the statements made not to be misleading, in light of the circumstances in which such statements were made.

Financial statements

Each officer shall satisfy himself or herself that the financial statements, and other financial information included in the report, fairly present in all material respects the financial condition and results of operations of Supernova as of, and for, the periods presented in the report.

Reports to securities regulators

Officers shall perform their responsibilities with a view to causing periodic reports filed with securities regulators to contain information which is accurate, complete, fair and understandable and to be filed in a timely fashion.

Reporting concerns and complaints

An officer who believes it is necessary or appropriate to do so can refer concerns about the quality and scope of financial or related reporting requirements to the Chair of the Audit Committee. Any officer who receives a bona fide material complaint about financial reporting from any employee shall report such complaints to the Audit Committee. Any officer who has disclosed such concerns in good faith shall not face any form of retribution.

2.3. COMPLIANCE WITH LAWS, RULES AND REGULATIONS

The officers are cognizant of their leadership roles within the organization and the importance of compliance with the letter and spirit of applicable laws, rules and regulations relating to financial and related reporting.

2.4. COMPLIANCE WITH THE CODE

General responsibilities

Officers have a special duty to be role models of appropriate business conduct and see that the principles and policies of this code and other Supernova guidelines and policies are upheld.

Reporting

Any violation or suspected violation of the code should be personally reported by an officer to Supernova's Executive Chairman of the Board, Chief Executive Officer, Chief Financial Officer or Chief Legal Officer.

Accountability

Non-compliance with this code in every respect by an officer will be a matter for consideration and review by the Board of Directors of Supernova.

3. Supernova anti-corruption policy

Policy statement

Supernova is committed to conducting its activities free from the illegal and improper influence of bribery and to ensuring compliance with all anti-bribery and anti-corruption laws and regulations that may be applicable to its business world-wide (collectively, "anti-corruption laws"). It is essential that our employees, managers, and directors, as well as all third parties who act on behalf of Supernova, comply at all times with the letter and the spirit of all anti-corruption laws.

Overview

Bribery is offering, giving, receiving, or soliciting **any item of value** to improperly influence the actions of a person **in order to obtain or retain business or an unfair advantage in the conduct of business**; **or to induce or reward improper conduct**. "Kickback" is another term for bribery. Bribery can arise in both the public and the private sphere. It can take place directly or indirectly (e.g. through a third party). It can take many forms. Anti-corruption laws require companies like Supernova to have proactive measures to prevent, detect, and address bribery and corrupt practices.

There are many reasons to care about bribery and corruption.

Bribery and corruption are crimes punishable by fines and/or imprisonment. Supernova officers, directors and employees, as well as third parties, must not engage in any form of bribery or corruption. Whenever employees are asked to approve or make a payment, they must ensure that they fully understand the reason for the payment and that the payment is legitimate. If in doubt, they should not make or agree to make the payment and contact the Supernova Legal Department or **hr@supernovait.se** for guidance.

Bribery and corruption have been identified as key factors that limit economic growth and contribute to inequality. By wrongfully benefiting a few individuals, they limit competition, undermine innovation, and corrupt societies. Bribery is also detrimental to our business – studies show that companies where bribery is condoned have lower levels of productivity and lower employee morale. Put simply, it is unethical and against Supernova’s values.

Individuals and companies can face civil and criminal charges resulting in large fines, imprisonment, and suspension or debarment from government contract processes. Failure to comply puts employees, their

colleagues, and Supernova at risk. This could have a very serious impact on employees, and Supernova's business and reputation.

3.1. BRIBES MUST NOT BE OFFERED OR ACCEPTED

Supernova prohibits the offering, giving, receiving, or soliciting of any item of value to improperly influence the actions of a person in order to obtain or retain business or an unfair advantage in the conduct of business; or to induce or reward improper conduct. "Items of value" can include:

- payments of money;
- extension of credit or loans;
- travel and accommodations expenses;
- gifts, meals, and entertainment;
- political contributions and charitable donations;
- free use of company services, facilities or property;
- favors that are of value to a recipient (e.g. offering a job to a member of a person's family)
- anything else of value.

Bribery and corruption can take many forms. Red flags can include cash payments or gifts to individuals or family members; inflated commissions; inflated invoices; fake consultancy agreements; unauthorized rebates; political or charitable donations; and excessive payment of travel expenses for inappropriate non-business related travel. In some cases, simply offering an inducement is unlawful, even if not accepted. **This policy is intended to help you understand how to apply this prohibition in our business**. It explores the areas identified above in more depth.

3.2. UNDERSTANDING SUPERNOVA POLICIES AND IDENTIFYING RISKS

The first step in compliance is to understand our code of ethics, including this policy, and how it impacts your responsibilities on a day-to-day basis. Knowing what steps to take to prevent risk and to ensure the proper handling of any issues relating to bribery and corruption is essential to compliance.

3.3. RESPOND

Supernova will assess bribery and corruption risks on an ongoing basis within each business unit. Supernova will implement mitigation plans and training programs as part of its system of internal controls. Supernova will also monitor compliance at the local level to ensure that this policy is being followed by all employees. You should always complete all required training and cooperate with ongoing monitoring.

3.4. DOCUMENT AND REPORT

All documentation of financial transactions must be accurate and complete. You should always document your transactions in compliance with the code of ethics, and report any issues arising under this policy that you become aware of as required by Supernova's ethics reporting policy. Questions under this policy can be addressed to **hr@supernovait.se**.

Areas of Focus

Supernova has established procedures and guidelines to translate this policy and our principles into practice. This section outlines the general requirements and procedures for the following risk areas:

(A) Gifts

Policy

Though gifts are recognized as appropriate ways of developing business relationships and promoting the Supernova brand, we must ensure that the offering, solicitation and receipt of gifts does not give rise to even an appearance of impropriety. Particular vigilance must be exercised where gifts are extended to Government Officials.

All gifts offered by Supernova must:

1. be permitted under local law and the anti-corruption laws and conform to generally accepted local customs
2. have a clear business purpose which is directly related to Supernova's commercial objectives
3. be reasonable in value and not appear lavish or extravagant
4. not be intended to create any obligation on behalf of the recipient or to result in Supernova receiving any favor or advantage in return.

Typically, small gifts containing the Supernova logo (such as coffee mugs, t-shirts, pens, and the like) offered sporadically to persons at Supernova promotional events (such as trade shows) will not violate this policy as long as they are not excessive.

You should consult with the Supernova Legal Department if you have any questions related to offering any gifts to Government Officials to ensure that they comply with local laws and the anti-corruption laws. You can also contact **hr@supernovait.se**.

Full Transparency Required

If offering or accepting a gift meets these standards, it must be made or accepted in a fully transparent way. Gifts which are excessive, frequent or intended to create an obligation on the part of the recipient are strictly prohibited.

How we ensure compliance

No reimbursement or payment for any gifts offered by a Supernova employee that otherwise comply with this policy will be made without adequate approvals in compliance with the Operations Management Framework and supporting documentation and/or receipts.

Red flags

Examples of common "red flags" that could indicate bribery or corruption include the following:

- Gifts that would be illegal under local or anti-corruption laws
- Gifts to/from parties engaged in a public tender or competitive bidding process
- Any gift of cash or cash equivalents, or securities
- Any gift where something is expected in return
- Any gift that appears excessive based on common sense standards or local custom
- Any gift that is paid for personally



(B) Hospitality, travel, entertainment and meals

Policy

As with gifts, providing hospitality, travel, entertainment, and meals (collectively, “hospitality”) to any person may be a violation of the law if they are excessive, unreasonable, or do not have a valid business purpose. The same principle applies to soliciting or receiving hospitality from existing or potential clients. Supernova prohibits payment or reimbursement of expenses for any person to attend site visits or other Supernova business events unless the expenses are reasonable, reflect actual costs incurred, directly relate to Supernova business, and are permissible under local law and custom. Supernova discourages the providing of hospitality to the family members or guests of clients unless a clear business purpose for the hospitality can be demonstrated.

Hospitality offered by or to Supernova employees

All hospitality offered by or to Supernova employees must meet these requirements:

- The hospitality must be permitted under local law and the anti-corruption laws and conform to generally accepted local customs
- The host offering the hospitality must be present
- The purpose is to hold a genuine business discussion or foster better business relations and do not develop any form of obligation
- The hospitality is openly offered and not solicited
- The hospitality is not frequent or excessive, and is reasonable in value, so as to not raise questions of impropriety

Full Transparency Required

If offering or receiving hospitality meets these standards, it must be made or accepted in a fully transparent way. Hospitality which is excessive, frequent, or intended to create an obligation on the part of the recipient is strictly prohibited.

How we ensure compliance

Approval for the payment or reimbursement of bona fide and actual hospitality expenses for clients, potential clients, and government officials must be obtained from the legal department prior to offering such a payment or reimbursement. All travel expenses must comply with the Supernova travel policy. Expenses related to hospitality offered by Supernova must be submitted and approved in accordance with Supernova expense reporting guidelines so that the expenses are properly categorized and auditable.

Red flags

Examples of common “red flags” that could indicate bribery or corruption include the following:

- Hospitality expenses for family members of any person
- Hospitality expenses submitted on behalf of non-Supernova employees (as opposed to being paid by Supernova directly)
- Payment for flights and accommodations for potential or existing Supernova clients to meet with Supernova representatives when the Supernova representatives could just as easily have met with the clients at the client’s site
- Use of travel agencies not approved by Supernova for arranging or paying for hospitality of government officials

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(C) Third parties

Policy

Most anti-Corruption Laws impose liability on companies which become involved in direct or indirect bribery. This means that Supernova may incur liability where a third party engaged to represent or provide a service to, or on behalf of, Supernova makes an improper payment or otherwise engages in improper conduct in the course of its work for Supernova. This exposure may arise notwithstanding that the payment or conduct in question is prohibited by Supernova and/or that Supernova had no knowledge of this payment. All Supernova dealings with third parties must be carried out with the highest degree of integrity, visibility, and in compliance with all relevant laws and regulations.

How we ensure compliance

Professional integrity is a prerequisite for the selection and retention of third parties by Supernova. Prior to the retention of any third party, the Supernova employee responsible for such retention must ensure that **appropriate due diligence** is conducted on such third party and any compliance "red flags" that are identified are properly addressed. In certain circumstances, third parties will receive compliance training, and all third parties are subject to Supernova's monitoring requirements and audit to ensure compliance with anti-Corruption laws and this policy. Contracts with third parties must, where appropriate, contain appropriate terms to mitigate corruption risks.

Supernova's approach to retaining, training and monitoring third parties is "risk-based", which takes into account a number of factors, including the corruption risk in the country in which the third party conducts its activities for Supernova, the nature of Supernova's relationship with the third party, the reputation and notoriety of the third party and the value and prospects of Supernova's relationship with the third party. In higher risk situations, enhanced due diligence, training and monitoring, including the third party's agreement to comply with **Supernova's third-party code of ethics**, will be required in accordance with procedures and protocols to be issued by the Supernova Legal Department.

Red flags

Examples of common “red flags” that could indicate bribery or corruption include the following:

- Excessive commissions to third-party representatives or consultants
- Third-party “consulting agreements” that include only vaguely described services
- Family, business, or other “special” ties with government or political officials
- Reputation for violating local law or company policy
- Negative press, rumors, allegations or sanctions
- Requests from government officials or clients to engage or hire specific third parties
- Lack of credentials for the nature of the work being performed by the third party
- Request to make payment to an entity located in an off-shore tax haven
- Lack of an office or established place of business, or a shell-company incorporated in an offshore jurisdiction
- Requests for payment of non-contracted amounts, or lack of documentation for services performed
- Convoluted or complex payment requests (such as payments to third parties or to accounts in other countries, requests for payments in cash, or requests for up-front payments)
- Requests for political or charitable contributions or other favors as a way of influencing official action
- Requests for specific sums of money to “fix” problems or “make them go away”

(D) Facilitation payments

Policy

"**Facilitation Payments**" are payments made to secure, facilitate or speed-up routine, non-discretionary government actions (e.g. payments for speeding up customs clearance, loading and unloading cargo or scheduling government inspections or issuing government licenses or port documentation). **Supernova regards facilitation payments to be a form of corruption and strictly prohibits them**.

How we ensure compliance

Supernova employees who are requested to make a facilitation payment should make a report to **hr@supernovait.se** immediately. In addition, any Supernova employee that makes a payment that could reasonably be misunderstood as a facilitation payment should make a report to **hr@supernovait.se** and ensure that the payment transaction is completely and accurately documented in Supernova's books and records.

Red flags

Examples of common "red flags" that could indicate bribery or corruption include the following:

- Payments to obtain permits, licenses, or work orders to which you are already entitled
- Payments to receive police protection or mail pickup/delivery
- Payments to receive phone service or water/power supply
- Payments to schedule inspections or transit of goods across border controls

(E) Anti-money laundering

Money laundering is the process by which one conceals the existence of an illegal source of income and then disguises that income to make it appear legitimate. Use by Supernova of proceeds tainted by illegality can give rise to liability in the countries in which Supernova operates. Supernova employees should make a report pursuant to the ethics reporting policy or to **hr@supernovait.se** if they become aware of suspicious circumstances leading them to believe that any transaction might involve the payment or the receipt of proceeds of any unlawful activity.

Red flags

Examples of common "red flags" that could indicate money laundering include the following:

- Refusal to disclose the source of funds or the beneficial ownership of funds
- Uncertain qualifications of a participant for a proposed transaction; for example, if the principal business of such participant appears to be unrelated to such transaction
- Cash payments
- Payments to and from tax haven jurisdictions
- Complicated payment and transaction structures, including the use of multiple parties in transactions where payments and shipments are made to or from third parties which are not parties to the underlying contract
- Criminal connections of transaction participants

Training and Monitoring

In furtherance of Supernova's commitment to compliance with the law, this anti-corruption policy is communicated to all Supernova directors, managers, members and third parties, and is available on the

Supernova Enterprise Portal. Responsibility for compliance with this policy, including the duty to seek guidance when in doubt, rests with the employee or relevant third parties.

Supernova will provide regular training on this policy. When necessary, specialized training will be provided to employees, directors and/or managers with significant compliance responsibilities or in high risk functions. Supernova will audit and monitor compliance with this policy on an ongoing basis.

Reporting of Suspected Violations

Subject to applicable law, any suspected breaches of this policy which directly or indirectly affect Supernova's business must be reported consistent with Supernova's ethics reporting policy. The process in place protects the incident reporter and ensures the confidentiality of the report. There will be no retaliation for making a report. According to our ethics reporting policy, you can make confidential reports of misconduct by calling (+46) 0760-206 306 or online **www.supernovait.se/reports/incidents**.

Consequences of Misconduct

The consequences of violating applicable anti-corruption laws are potentially very serious for Supernova and individual employees. Supernova will vigorously enforce compliance with this policy. Violations may result in disciplinary action, including in serious cases, termination of employment. Violations may also result in criminal and civil exposure for Supernova and any individuals involved, including imprisonment, fines and damages actions, and can cause significant damage to Supernova's reputation in the market place. Supernova may also face suspension and disbarment from public sector contracts as a result of violations by Supernova employees.

Third parties who breach the Supernova third party code of ethics may also be subject to prosecution and severe penalties, including the termination of their contract with Supernova.

Questions about this Policy

Questions about the application of this policy to specific circumstances can be directed to **hr@supernovait.se**. Questions can also be directed to your local Supernova Legal Department or Human Resources representative.

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