

SYMETRI

PART OF ADDNODE GROUP

CODE OF CONDUCT





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FOREWORD

At Symetri, we challenge people to work smarter *for a better future*. That means we always need to be mindful of the long-term consequences of our actions. Internally and externally, we are committed to driving positive change, whether through enhancing customer relations, promoting sustainability, fostering employee satisfaction, nurturing partnerships, or advancing technology. This Code of Conduct offers a baseline guide for *how* we operate for a better future.

For the long-term success of Symetri, we all must make a personal commitment to follow this Code of Conduct and embrace the Symetri Way.

A handwritten signature in black ink, appearing to read 'JK', with a long, sweeping underline that extends to the left and loops back under the main signature.

Jens Kollserud

OUR GUIDING STAR

**We Challenge People to Work Smarter
for a Better Future**



Our guiding star, values, and cornerstones are crucial to everything we do at Symetri. As an employee or contractor at Symetri, you are expected to represent these values and cornerstones in your actions.

VALUES AND CORNERSTONES

As a trusted partner for our customers, we constantly seek to challenge people to work smarter for a better future. With our expertise, leading-edge technology, and services we always strive to enable our customers to gain an increased competitive advantage. We continuously challenge ourselves and our customers to work smarter and we are proud of the values that we live by.

OUR VALUES:



COURAGE

We have the courage to make a difference.



PASSION

We are proud of what we do.



TEAMWORK

We have the right team spirit for collaboration, we put the team before ourselves and we always help each other if we can, regardless of titles or roles.



CHANGE

We embrace change.

OUR STRATEGIC CORNERSTONES:



KNOWLEDGE & EXPERTISE

We seek out, share, and foster knowledge.



LEADING EDGE TECHNOLOGY

We take the necessary steps to offer our customers the best solutions to their problems.



WORK SMARTER

We follow best practices and maximize efficiency.



TRUSTED PARTNER

We build long-term relationships with customers and take responsibility to ensure their success.

INTRODUCTION



Purpose of the Code of Conduct

Symetri's Code of Conduct exists to ensure that everyone is aligned with our views on business, as well as our policies and values. This framework outlines the expected behavior for every employee and contractor regardless of their position, role, or location.

The code is based on Addnode Group's Code of Conduct, as well as Symetri's values and cornerstones. It represents what is important to us, what we stand for as well as our approach to customers, partners, employees, and the world around us.

ADDNODE GROUP'S CODE OF CONDUCT

Our Commitment

A culture of compliance is essential to safeguard our company values and reputation in the market. Compliance entails adhering to the legal standards of the countries where we operate. We are dedicated to upholding all relevant laws and regulations while conducting ourselves in an ethical, responsible, and sustainable manner. Symetri's Code of Conduct is intended to help us comply with laws and regulations, fulfil our objectives as a company and enable good teamwork.

Our principles are also aligned with several international conventions and guidelines, including:

- UN Universal Declaration of Human Rights.
- ILO's eight core Conventions Nos. 29, 87, 98, 100, 105, 111, 138 and 182.
- UN Convention on the Rights of the Child.
- UN Declaration Against Corruption.
- UN Global Compact.

To Whom Does the Code Apply?

The Code of Conduct applies to all employees on all levels at Symetri including the board of directors. Furthermore, it applies to external consultants, business partners and other individuals engaged by Symetri who act as Symetri representatives. The only exception to following the Code of Conduct is if local laws require otherwise.

What is Expected of You?

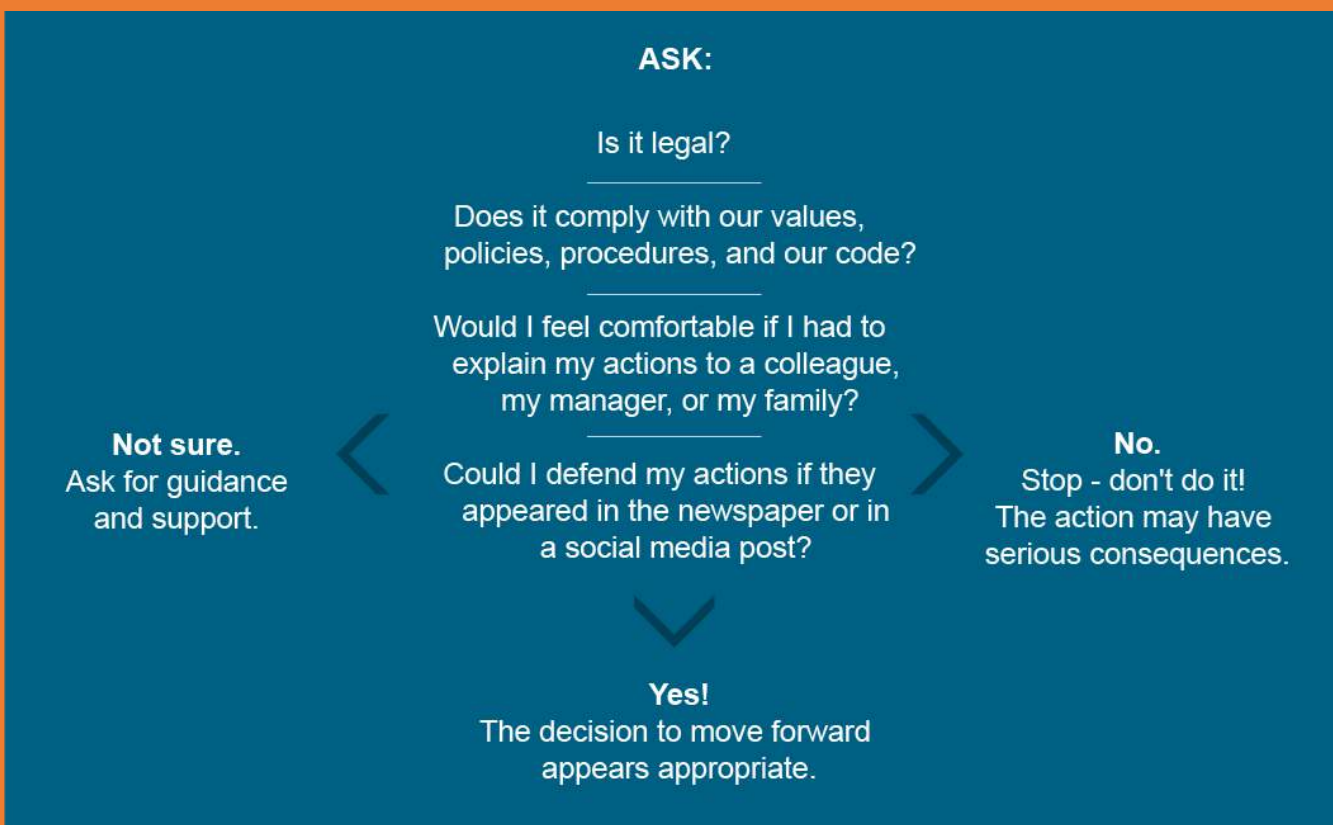
Our business philosophy is based on the delegation of responsibility with the authority to act. The ability to take initiative in day-to-day work is a key driving force and success factor.

We expect you to act responsibly and practice sound decision making. We respect decisions and follow internal procedures and guidelines provided by Symetri. It is Symetri’s responsibility to provide, update, and make available policies and guidelines.

What Happens if You Do Not Comply?

Symetri takes failure to comply with the Code of Conduct seriously as it can cause damage to the company’s interests, people, brand, and reputation. Violations of the Code of Conduct can lead to disciplinary actions, including the termination of the employment contract or contractual relationship.

We continuously provide training to ensure knowledge and compliance with this code. You are responsible for your decisions and nobody, at any level, has the authority to instruct you to do something illegal or unethical. If you are faced with an ethical dilemma and are unsure of how to proceed, use this chart to help guide you to the best course of action:



Responsibility to Report

You may come across a situation that does not appear to conform with the principles set out in our Code of Conduct, our policies, or the law. In such an instance, we expect you to bring your concern to the company's attention so we can improve our work environment, reduce the risk for Symetri, and continue to be an ethical and sustainable company.

Symetri provides a whistleblower channel for reporting concerns which is open to all employees, business partners, and stakeholders.

[SYMETRI'S WHISTLEBLOWER SITE](#)

If necessary, and if the nature of the specific issue warrants it, you have the option to use Addnode Group's whistleblower function as an alternative.

[ADDNODE'S WHISTLEBLOWER SITE](#)

Additionally, we encourage you to speak with your immediate manager, their manager, HR, or the CEO when appropriate.

Any reports will be treated with strict confidentiality. We do not tolerate retaliation against persons who report things in good faith. Good faith means that everything you report is true to the best of your knowledge and that you have reported everything you know.



SYMETRI IN THE WORKPLACE:

SECURING PEOPLE AND
THE ENVIRONMENT



Fair Working Conditions

As a Symetri employee/contractor you can expect fair compensation for your work and to be treated with respect in accordance with your employment rights. We only permit working hours, wages, and benefits that comply with national and local laws. All employees must have a written employment agreement, typically an offer letter, which is in accordance with local regulations.

We recognize and respect collective bargaining agreements and our employees' rights to freedom of association, where permissible by law. We maintain good relations with labor organizations, trade unions and workers' representatives. Symetri employees and contractors have the right to be treated with respect and dignity. In turn, you must also respect the dignity, privacy, and rights of the people you interact with and those who are affected by our business operations.

Health, Safety, and Well-being

As a Symetri employee, it is your responsibility to follow health and safety laws, standards, and instructions relevant to your job. If you notice any unsafe or non-compliant situations or behavior, you should act and report non-compliance.

Symetri employees and contractors can expect a socially, physically, and psychologically healthy workplace. This includes supportive management, a sense of purpose, and a feeling of physical and psychological safety. We encourage social activities to enhance overall health and well-being and every individual who works at Symetri is expected to contribute to a healthy work environment.

Continuous Learning and Career Development

We believe that people are our greatest asset and support our employees through training and development opportunities to further their expertise as well as personal and professional growth. We support our employees' continuous learning and development through an annual talent review process and by reinforcing a culture of networking, collaboration, and sharing of best practices. As a Symetri employee, we also expect you to take responsibility for your own development.

Transparent Communication

At Symetri we are honest, trustworthy, and timely in our communication. We take responsibility to make sure all parties, be it customers, suppliers, partners, or colleagues, have the information they need, when they need it. As an employee/contractor you are expected to be constructive and positive in your communication and to practice active listening.

Inclusion and Diversity

At Symetri, we appreciate that all people are unique and are to be respected for their individual talents. For this reason, we strive to attract a diverse workforce and to create an inclusive work environment which allows everyone to contribute. By embracing diversity, we open Symetri to new ways of thinking, new skills, and new opportunities.

We do not tolerate any form of discrimination based on ethnicity, religion, gender, disability, age, language, marital status, race, gender expression, sexual orientation, political or other opinion, national or social origin, property, birth, or any other status.

Preventing Harassment

As a Symetri employee or contractor, we must treat each other with respect. Symetri does not tolerate harassment of any kind, whether physical or verbal. Harassment is an action or behavior that is intimidating, humiliating, offensive or hostile to an individual or group of people.

Harassment, threats, or other unsuitable conduct are never permitted whether physical or verbal. We always respect others' privacy and personal space and, therefore, you may never:

- Engage in physical or psychological actions that are bullying, intimidating, repressive, degrading, humiliating, sexist, offensive, or hostile.
- Distribute or display offensive material at the workplace.
- Behave in a way that can make a colleague feel excluded or unwelcome.

This applies to physical work environments and digital channels such as messages, social media platforms, or websites.

Alcohol and Drug Policy

Symetri promotes a healthy workplace and does not encourage alcohol consumption. Although alcohol may be served at certain events, it is never a focus and unhealthy consumption is never endorsed. When alcohol is served it should be in limited amounts and there should always be non-alcoholic alternatives available. Alcohol consumption is not allowed during working hours.

Use of illegal drugs, or prescription drugs used illegally (e.g., to use prescription drugs that have not been legally obtained or in a manner or for a purpose other than as prescribed) is not tolerated.

Any person affected by alcohol or drugs during working hours must be sent home in a safe way. Symetri will support employees with alcohol and/or drug dependency to get help.





SYMETRI IN THE MARKETPLACE:

SECURING BUSINESS AND INTEGRITY

Information Security

Our business information is an important asset to our company. How you handle this information in both digital and physical forms is key to preventing loss or theft of said information. Leaked, incorrect, or unavailable information affects the reliability and competitiveness of Symetri. It is therefore crucial to ensure that information assets are properly secured.

We make sure that information is accurate and available to those who need it when they need it. We are committed to protecting the personal information of our employees and stakeholders with whom we engage. We handle information about our company and related parties with caution and take the necessary measures to ensure the protection of business-critical information. You are always expected to handle information in accordance with the applicable Information Security Policy and in compliance with laws and regulations in the countries in which we operate.

Privacy and Data Protection

Handling personal data with respect and in a secure and lawful manner is vital. Symetri respects the individual's right to privacy, and we are committed to handling personal data responsibly and in compliance with applicable privacy and data protection laws as well as in accordance with internal policies, instructions, and contractual arrangements with customers.

Intellectual Property

Inventions and other intellectual property originated during your employment at Symetri are considered the property of Symetri and you hold no copyright nor any other intellectual property rights to any such items.

Supplier, Partner, and Subcontractor Requirements

We do not collaborate with parties that practice unethical business. All subcontractors, partners, and suppliers must be able to demonstrate fair business practices and sound working conditions that adhere to local laws and legislation and also comply with the Symetri Supplier Code of Conduct.

SYMETRI SUPPLIER CODE OF CONDUCT

International Trade and Sanctions

We must always ensure that we follow rules linked to sanctions and other regulations that aim to promote peace and security, prevent conflicts, support rule of law and human rights, and defend principles of international law and democratic values. Adhering to sanctions is therefore not only a legal matter but also essential to our ethical values.

Anti-Corruption and Fair Competition

We are committed to being a trusted partner and building long-term partnerships with our customers, partners, and suppliers. We always adhere to all applicable competition and antitrust laws, rules, and regulations to prohibit agreements and arrangements between parties that restrict competition. This includes price-fixing, dividing customers and geographical markets, cartels, and abuse of a dominant position. Symetri has a zero tolerance for any form of corrupt conduct, including transactions made indirectly through a third party such as a sub-consultant or intermediary. Corruption is the abuse of entrusted power for personal or company gain and includes bribery, fraud, facilitation and protection payments, and money laundering.

Non-exhaustive examples of prohibited activities include:

- Never offer, request, promise, give, accept, or demand, or collect any unlawful or improper gifts, contributions, sponsorships, loans, hospitality, employment opportunities, or other favors or benefits (bribes).

- Ensure that improper payments, including facilitation payments, are not made to domestic or foreign officials, public or private sector employees, political figures or other similar representatives, nor others who act on their behalf.
- Never participate in activities such as extortion, influence peddling, financing of bribery, fraud nor any practices that circumvent regulations. Immediately report any attempts to involve you in such activities.

Involvement in corruption will lead to disciplinary action and may lead to termination of employment.

Non-Public Information

Addnode Group, Symetri's owner, is listed on Nasdaq Stockholm in the Large Cap segment. Therefore, it is crucial to handle inside information properly. Inside information is non-public information which, if made public, would be likely to have a significant effect on the price of financial instruments issued by Addnode Group. If you have inside information you may not buy or sell Addnode instruments. Nor may you disclose such information to any third party, for example friends and family, by, for example, recommending they buy Addnode Group instruments. Refer to Addnode Group's Insider Policy for further information about the relevant rules and restrictions in relation to inside information.

ADDNODE GROUP'S INSIDER POLICY

Conflicts of Interests

Conflicts of interest occur when there is a conflict between personal interest and our responsibilities as employees or representatives of Symetri. We do not allow personal interest to interfere with our ability to take fair and objective decisions. Even the appearance of a conflict can be as damaging as an actual conflict.

We all have a responsibility to act in an open and transparent way and inform relevant parties when a conflict of interest occurs. If a conflict of interest nonetheless occurs, you must immediately inform your manager to find ways to resolve it.

You must never let conflicting interests influence your behavior at the expense of a party that has put legitimate trust in you and Symetri.

Nepotism

We operate in a relatively small business in which close relationships are inevitably a factor. Because of this we have a greater responsibility to ensure fair business practices and avoid nepotism.

Nepotism includes favoritism of friends or family members in internal situations such as recruitment, salary negotiations, and promotions, as well as external situations such as business negotiations, price setting, and choosing suppliers/contractors. You have a responsibility to act in an open and transparent way when relationships may influence business decisions.

Hospitality and Gifts

A gift includes any tangible object of any kind, regardless of value. Symetri merchandise is not considered a gift. Hospitality is defined as meals, accommodation, or any events or forms of entertainment. Prior to offering or accepting any gifts or hospitality, we must ensure that the value is reasonable and that they are given and received in accordance with the laws of the relevant country.

Symetri will never offer, give, or receive anything of value, including gifts and hospitality, to influence government officials or any other business relations, either directly or through a third party. Additionally, we never offer or receive gifts or hospitality that appear to be offensive or inappropriate. We do not, under any circumstances, gift alcohol to customers or prospects.



SYMETRI IN THE WORLD:

SECURING SUSTAINABILITY



Sustainability

Symetri has, together with our owner Addnode Group, identified six of The United Nations Sustainable Development Goals (SDG) which we can impact the most through our business and operations.

Symetri recognizes that our biggest impact is achieved through our products and services, including design for sustainable development and circular economy, simulations for environmental and health benefits, and improved citizen involvement and dialogue. With our solutions we contribute to sustainable cities and communities (SDG 11), industry, innovation, and infrastructure (SDG 9), and good health and well-being (SDG 3). Focusing on climate action (SDG 13), we continuously innovate for sustainability and develop new products which enable our customers to reduce CO₂-emissions and act more sustainably. One example is Naviate Zero, our solution which helps users minimize their carbon footprint by making smart and sustainable choices in the design material selection process.

From our own perspective, the environmental impacts of our operations come mainly from office spaces and traveling. We collect and report our CO₂ emissions to Addnode Group and expect our employees to make conscious travel choices regarding the environmental cost of those CO₂ emissions. We aim to continuously ensure knowledge and awareness regarding sustainability within our organization. We commit to further development of sustainability objectives and KPIs to continuously improve the sustainability of our operations.

Symetri contributes to decent work and economic growth (SDG 8) by committing to providing an inclusive, fair, and diverse workplace. We promote the UN Global Compact and its principles of human rights, labor standards, environment, and anticorruption. We advocate for a good work-life

balance and the well-being of our employees and also support professional development and continuous learning. We use the Employee Net Promoter Score (eNPS) as an indicator of employee engagement and loyalty. We contribute to sustainable economic growth by providing our customers with software which facilitates sustainable choices, increased efficiency, and productivity.

As for gender equality (SDG 5) we are striving to increase any under-represented gender through new recruitments. We have the goal that at least 40 percent of each management team will consist of the under-represented gender by 2030



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