

Decision by the Disciplinary Committee regarding Rolling Optics Holding AB

Stockholm, May 14, 2025— The Disciplinary Committee of Nasdaq Stockholm (the “Exchange”) has found that Rolling Optics Holding AB (the “Company”) has breached the rules of Nasdaq First North Growth Market (the “Rulebook”) and therefore ordered the Company to pay a fine of three annual fees, corresponding to an amount of SEK 375,000.

On May 20, 2024, the Company announced the outcome of an arbitration between the Company and a former business partner. The dispute concerned two agreements between the parties that the Company terminated in April 2023. The arbitration award was issued on May 16, 2024. The Company assessed that it needed time to fully understand the significance of the award for the Company and what information should be disclosed to the market. The Company decided to delay its disclosure of the inside information and called a board meeting to address the issue, which was held on the evening of May 19, 2024.

The Disciplinary Committee understands the Company's assessment, but argues that the analysis of the arbitration award could not have required a formal board meeting to be called and held. Even less so, there were no grounds to delay the disclosure of information until the morning after the board meeting. Against this background, the Disciplinary Committee's assessment is that the Company's decision to postpone the announcement of the relevant insider information was not in accordance with Article 17.4 of the EU Market Abuse Regulation, and the information was therefore not disclosed in a timely manner. The Company has thus violated point 4.1.1 of the Rulebook. The Disciplinary Committee considers the violation to be serious and therefore imposes a fine equivalent to three annual fees.

The Disciplinary Committee's decision is available at:

<https://www.nasdaq.com/market-regulation/nordic/stockholm/disciplinary/decisions-sanctions>

About the Disciplinary Committee

The role of Nasdaq Stockholm's Disciplinary Committee is to consider suspicions regarding whether Exchange Members or listed companies have breached the rules and regulations applying on the Exchange. If the Exchange suspects that a member or company has acted in breach of the rules, the matter is referred to the Disciplinary Committee. Nasdaq Stockholm investigates the suspicions and pursues the matter and the Disciplinary Committee issues a ruling regarding possible sanctions. The sanctions possible for listed companies are a warning, a fine or delisting. The sanctions possible for Exchange Members are a warning, a fine or debarment. Fines paid are not included in the Exchange's business but are attributed to a foundation supporting research in the securities market. The Disciplinary Committee's Chairman and Deputy Chairman must be lawyers with experience of serving as judges. At least two of the other members of the Committee must have in-depth insight into the workings of the securities market.

Members: Former Supreme Court Justice Marianne Lundius (Chairman), Supreme Court Justice Petter Asp (Deputy Chairman), Supreme Court Justice Johan Danelius (Deputy Chairman), Company Director Anders Oscarsson, Company Director Joakim Strid, Lawyer Wilhelm Lüning, Lawyer Patrik Marcelius, Lawyer Erik Sjöman, MBA Carl Johan Högbom, Authorized Public Accountant Magnus Svensson Henryson, Former Authorized Public Accountant Svante Forsberg, Lawyer Magnus Lindstedt and director Kristina Schauman.



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