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**NASDAQ STOCKHOLM'S**

**DECISION**

**11 April 2022**

**DISCIPLINARY COMMITTEE**

**2022:04**

Nasdaq Stockholm

Precomp Solutions AB

## **DECISION**

The Disciplinary Committee orders Precomp Solutions AB to pay a fine to Nasdaq Stockholm corresponding to five times the annual fee.

### **Motion**

The shares in Precomp Solutions AB (the "Company") are admitted for trading on Nasdaq Stockholm AB's (the "Exchange") MTF platform, Nasdaq First North Growth Market. The Company has signed an undertaking to comply with the Exchange's Rule Book for Nasdaq First North Growth Market applicable from time to time ("Rule Book").

The Exchange has argued that the Company did not properly issue the notice to attend the Company's annual general meetings in 2017, 2018, 2019, or 2020, thereby violating section 4.2.3 (a) in combination with section 4.1 of the Rule Book on four occasions.

Company has admitted the violations of the Rule Book.

### **Reasons for the decision**

#### The Rule Book

Pursuant to section 4.2.3 (a) of the Rule Book, an issuer shall disclose notice to attend general meetings. Section 4.2.1 of the Rule Book, in combination with section 4.1 of the Rule Book, provide that, with regards to time and method, such publication shall take place in the same manner as a disclosure of inside information.

Pursuant to Article 17 of Regulation (EU) No. 596/2014 of the European Parliament and of the Council of 16 April 2014, ("MAR"), the issuer shall inform the public as soon as possible of inside information which directly concerns that issuer. Pursuant to Article 2 of Commission Implementing Regulation (EU) No. 2016/1055 of 29 June 2016 (the "Implementing Regulation"), such public disclosure of inside information shall take place using technical means that ensure that the information is disseminated to as wide a public as possible on a non-discriminatory basis.

#### Considerations

The Company's notices to attend the 2017, 2018, 2019, and 2020 annual general meetings were published in *Post- och Inrikes Tidningar* and were made available on the Company's website in connection with the publication, but were not made public in a press release.

*The Exchange has argued:* Notices to attend the Company's 2017–2020 annual general meetings were published in *Post- och Inrikes Tidningar* and on the Company's website without having been made public in a press release prior thereto. Consequently, the notices to attend were made available to the public on a discriminatory basis. The Company thus committed repeated violations of section 4.2.3 (a), in combination with sections 4.2.1 and 4.1, of the Rule Book.

*The Company has argued:* The Company admits the violations of the Rule Book that occurred prior to the 2017-2020 annual general meetings. The Company takes a very serious view of what occurred and, in this context, would like to point out that the Company has taken a great number of measures to ensure that the Company's routines and systems for disclosure of information are adequate and that the Company's employees who are involved in these matters, including the board of directors, are well versed in the applicable regulatory framework in relation to the disclosure of information. Furthermore, the Company would like to point out that the notices to attend that were published incorrectly did not contain inside information.

*The Disciplinary Committee notes* that it undisputed that the Company did not publish the notices to attend the 2017–2020 annual general meetings as required by the MAR and the Implementing Regulation and that the Company thereby violated section 4.2.3 (a), in combination with 4.2.1 and 4.1, of the Rule Book. The Disciplinary Committee holds that the violations are serious, and therefore sanctions must be imposed in the form of a fine. In view of the fact that there were repeated violations over a long period of time, the fine shall be set at five times the annual fee.

On behalf of the Disciplinary Committee,

A handwritten signature in blue ink, appearing to read 'Marianne Lundius', is shown within a light gray rectangular box.

Marianne Lundius

Former Justice Marianne Lundius, Justice Petter Asp, former authorised public accountant Svante Forsberg, *advokat* Wilhelm Lüning, and *advokat* Erik Sjöman participated in the committee's decision.

Secretary: Erik Lidman, J.D.