

Decision by the Disciplinary Committee regarding Brighter AB

Stockholm, November 23, 2022— The Disciplinary Committee of Nasdaq Stockholm has found that Brighter AB (the “Company”) has breached the Nasdaq First North Growth Market Rulebook (the “Rulebook”) and therefore ordered the Company to pay a fine of eight annual fees, corresponding to an amount of approximately SEK 1,500,000.

The Disciplinary Committee concludes that the Company on several occasions between 2020 and 2022 has breached Article 17 of the EU Market Abuse Regulation (“MAR”) and the obligation to disclose inside information in a manner that enables a complete and correct assessment of it, by:

- not, in its disclosures of distribution agreements, having included information that the agreements were conditional upon regulatory approvals,
- having disclosed incorrect information about the subscription price for a warrant that the Company intended to issue,
- having disclosed misleading information regarding the terms for employment of the Company’s CEO.

The Disciplinary Committee concludes that the Company, through these violations, consequently also breached item 4.1 of the Rulebook.

The Disciplinary Committee further concludes that the Company did not hold its annual general meeting 2021 within the deadline set out in the Swedish Companies Act, and that the Company thereby breached item 1.3 of the Rulebook.

The Disciplinary Committee takes a serious view of the Company’s violations and orders the Company to pay a fine of eight annual fees.

The Disciplinary Committee’s decision is available at:

<https://www.nasdaq.com/solutions/decisions-sanctions-stockholm-2022>

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, Company Director Anders Oscarsson, Company Director Jack Junel, Company Director Joakim Strid, Lawyer Wilhelm Lüning, Lawyer Patrik Marcellius, Lawyer Erik Sjöman, MBA Ragnar Boman, MBA Carl Johan Högbom, Authorized Public Accountant Magnus Svensson Henryson and Former Authorized Public Accountant Svante Forsberg.

About Nasdaq

Nasdaq (Nasdaq: NDAQ) is a global technology company serving the capital markets and other industries. Our diverse offering of data, analytics, software and services enables clients to optimize and execute their business vision with confidence. To learn more about the company, technology solutions and career opportunities, visit us on LinkedIn, on Twitter @Nasdaq, or at www.nasdaq.com.

Nasdaq Media Contact

Erik Gruvfors

+46 73 449 78 12

erik.gruvfors@nasdaq.com