<u>IMPORTANT NOTICE</u>: This version is a translation of the original Swedish decision and is only made available for information purposes.

NASDAQ STOCKHOLM'S	DECISION	2026-08-17
DISCIPLINARY COMMITTEE	2026:10	

Nasdaq Stockholm

Magle Chemoswed Holding AB

DECISION

The Disciplinary Committee orders Magle Chemoswed Holding AB to pay Nasdaq Stockholm a fine corresponding to two times the annual fee.

Motion

The shares of Magle Chemoswed Holding AB ("Magle" or the "Company") are traded on Nasdaq First North Growth Market, a multilateral trading facility operated by Nasdaq Stockholm (the "Exchange"). The Company has undertaken to comply with the Exchange's rules and regulations for Nasdaq First North Growth Market as applicable from time to time (the "Rulebook").

The Exchange has alleged that the Company has breached the Rulebook by failing to disclose inside information in accordance with the requirements of the EU Market Abuse Regulation and the Rulebook.

The Company has acknowledged the breach of the Rulebook.

Neither party has requested an oral hearing. The Disciplinary Committee has reviewed the documents in the case.

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Reasons for the decision

The Rulebook

Pursuant to section 4.1.1 of the Rulebook, an issuer shall disclose inside information in accordance with Article 17 of Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 ("MAR").

Pursuant to Article 17.1 of MAR, an issuer shall inform the public as soon as possible of inside information which directly concerns the issuer. The inside information shall be made public in a manner which enables fast access and complete, correct and timely assessment of the information by the public.

Considerations

On October 22, 2025, the Company published a press release entitled "Magle Biopolymers receives 2026 order showing a material increase in demand for one of its proprietary dextran derivatives". The press release stated, inter alia, the following:

> [Magle] today announces that its subsidiary […] has received an order for 2026 from a customer, representing a material increase in demand for one of its proprietary dextran derivatives.
>
> The confirmed order reflects a significant rise in committed volumes compared with previous years and, if delivered as agreed, will have a materially positive impact on the earnings of Magle Biopolymers and the Magle Group's consolidated financial performance for the 2026 financial year.
>
> The customer, which has shown strong growth and increasing market share, utilises Magle Biopolymers' proprietary dextran-based materials as a key functional component in its commercial products. The new order strengthens the long-term partnership between the two companies and underlines the strategic importance of Magle Biopolymers' dextran technology platform in supporting customers experiencing expanding global demand.
>
> Fredrik Andersson, Chief Operating Officer of Magle Group, commented: "We are very pleased to receive this binding order, which marks a strong vote of confidence in our technology, our production capabilities, and our longstanding partnership with the customer. This agreement confirms the growing industrial relevance of our proprietary dextran derivatives and reinforces our role as a trusted supplier of high-quality biopolymer materials."
>
> Magle Group considers this information to constitute inside information under Article 7 of the EU Market Abuse Regulation (MAR), as the order is binding and expected to have a material positive impact on the company's financial results and, therefore, may have a significant effect on the share price of Magle Chemoswed Holding AB (publ). The company is therefore disclosing this information in accordance with MAR and the Nasdaq First North Growth Market Rulebook.

The Exchange has submitted: Pursuant to Article 17.1 of MAR, inside information shall be made public in a manner which enables fast access and complete, correct and timely assessment of the information by the public. This obligation requires an issuer to provide the information necessary to enable a complete and correct assessment of the significance of the inside information for the issuer and its financial instruments. In the case of an order received, information regarding the value of the order and the identity of the contractual counterparty should be included. The Exchange understands the press release of October 22, 2025, and the

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submissions made in the matter to mean that the inside information contained in the press release related both to the size of the order value and to the strengthened partnership with an existing customer resulting from the agreement. Both of these details should therefore have been included in the press release in order to enable the public to make a complete and correct assessment of the information. Since the press release included neither more detailed information regarding the order value nor the identity of the contractual counterparty, it did not enable a complete and correct assessment of the significance of the order for the Company and its financial instruments. The Company has therefore breached Article 17.1 of MAR and, consequently, item 4.1.1 of the Rulebook.

The Company has submitted: The Company admits the breach of the Rulebook alleged by the Exchange. The Company nevertheless wishes to emphasize that it takes its disclosure obligations under MAR and the Rulebook very seriously and deeply regrets that the press release did not meet the required standard. In response to the matters raised by the Exchange, the Company has conducted a thorough review of its internal procedures for identifying and disclosing inside information. As a result of the review, the Company has strengthened its internal disclosure controls, enhanced its monitoring of compliance with its insider information and communications policies, and engaged external legal counsel, which will review all press releases prior to publication going forward. The Company wishes to emphasize that this is the first time it has been found to have breached Article 17 of MAR or the Rulebook. In light of the measures described above, the fact that this is the Company's first breach, and the Company's full cooperation with the Exchange throughout the proceedings, the Company requests that no penalty be imposed.

The Disciplinary Committee finds that it is undisputed that the Company, because the press release of October 22, 2025, did not enable a complete and correct assessment of the significance of the order for the Company and its financial instruments, breached Article 17.1 of MAR and, consequently, item 4.1.1 of the Rulebook. The Disciplinary Committee considers the breach to be serious, and a fine shall therefore be imposed. The fact that the Company has taken measures to remedy the underlying deficiencies in its disclosure practices is positive but cannot absolve the Company from liability. The Disciplinary Committee determines the fine to be equivalent to two annual fees.

On behalf of the Disciplinary Committee,

Petter Asp

Supreme Court Justice Petter Asp, Supreme Court Justice Johan Danelius, former authorized public accountant Svante Forsberg, director Anders Oscarsson and Supreme Court Justice Erik Sjöman participated in the Committee's decision.

Secretary: Professor Erik Lidman