**Important information to investors regarding the issue of shares in Dignitana pursuant to the Swedish Screening of Foreign Direct Investments Act**

**The Swedish Screening of Foreign Direct Investments Act (2023:560) (the ”FDI Act”) entered into force on 1 December 2023. Dignitana AB (publ) (the ”Company” or ”Dignitana”) is subject to the FDI Act. Below is important information to investors regarding notification requirements for certain investments that may arise in connection with the issue of shares in Dignitana.**

# BACKGROUND

The FDI Act aims to prevent foreign direct investment in Swedish businesses conducting activities worthy of protection that could have a detrimental effect on Sweden’s security or on public order or public safety in Sweden.

Foreign direct investment refers to investments made by:

1. natural persons with the nationality of a non-EU state,
2. legal entities with a registered office in a non-EU state; or
3. legal entities directly or indirectly owned or controlled by a non-EU State; or
4. legal entities directly or indirectly owned or controlled by a legal entity established in a non-EU State or by a natural person having the nationality of such a State.

Investments made by investors for the benefit of any of the above-mentioned parties also constitute a foreign direct investment.

The Inspectorate for Strategic Products (”**ISP**”) is the responsible reviewing authority. The FDI Act imposes a mandatory and suspensive notification obligation for certain investments in activities worthy of protection, meaning that notifiable investments may not be carried out until they have been cleared or approved by the ISP.

The notification obligation applies to all investors regardless of nationality, registered office or ownership structure. However, the ISP can only prohibit foreign direct investment, which means that the ISP cannot prevent investments made by Swedish or European investors (these only need to be notified to the authority). For investments made in violation of the provisions of the FDI Act, the ISP can impose sanctions.

# DIGNITANA IS SUBJECT TO THE FDI ACT

The FDI Act applies to businesses conducting activities worthy of protection. Activities worthy of protection refer to several different areas of activity, including essential services. The Swedish Civil Contingencies Agency (the “**MSB**“) has issued regulations that list the types of activities that are essential services. According to MSB’s regulations, manufacturing of medical technology devices is covered. Dignitana is a medical technology company that develops and manufactures the DigniCap® Scalp Cooling System and is therefore considered to carry out activities worthy of protection under the FDI Act. Dignitana’s obligation to disclose the applicability of the FDI Act to its activities is fulfilled by this information document.

# CONSEQUENCES FOR INVESTORS OF THE APPLICABILITY OF THE FDI ACT TO DIGNITANA

Under the FDI Act, investments in Dignitana must be notified to the ISP if they result in the investor, a member of its ownership structure or someone on whose behalf the investor is acting, acquiring voting rights in the Company equal to or exceeding 10, 20, 30, 50, 65 or 90 percent. Investments must also be notified if they would in any other way give the investor, a member of its ownership structure or someone on whose behalf the investor is acting a direct or indirect influence in the management of Dignitana.

The notification obligation also covers investments by way of new issue of securities (however, see exception for new issue of securities with pre-emption rights below).

When calculating the votes referred to above, votes held directly or indirectly by a related party shall be counted. Related parties are defined as spouses, registered partners, cohabitants, parents and children and children’s spouses, registered partners or cohabitants.

Investments in Dignitana must be notified by the respective investor prior to the execution of the investment, but not before the investment is imminent.

# EXCEPTION FOR NEW ISSUE OF SECURITIES WITH PRE-EMPTION RIGHTS

A notification in accordance with the foregoing is not required for acquisition of shares acquired in a new issue with pre-emption rights in relation to the number of shares the investor owns in Dignitana. Investors who in the current issue of shares only subscribe for their pro rata right are thus not subject to the notification obligation.

However, investors who subscribe for shares in excess of their pro rata right and thereby acquire votes in Dignitana equal to or exceeding 10, 20, 30, 50, 65 or 90 percent of the votes in the Company must notify the investment to the ISP before it can be carried out.

# THE NOTIFICATION PROCEDURE

Notification to ISP can either be made via the authority’s digital case management system Kundwebben (separate login and civil registration in Sweden is required) or by submitting a form by email or post to the authority. The form is available on ISP’s website ([www.isp.se/utlandska-direktinvesteringar](http://www.isp.se/utlandska-direktinvesteringar)) and can be filled in either in Swedish or English.

The ISP has 25 working days from the submission of a complete notification to the authority to decide whether an investment should be cleared or reviewed. If the ISP initiates a review, the authority has an additional 3 months to make a decision (if there are special reasons, this time window can be extended to a total of 6 months). After the notification is cleared or approved, the investment can be pursued as usual.

As deadlines do not start for incomplete applications, it is important that investors provide, at the request of the ISP, the information or documents that the authority needs for its assessment or to verify compliance with the notified conditions.

The ISP requests, inter alia, information on the ownership structure of the investor, information on the investment and information on Dignitana. Dignitana will provide the information required by the Company for the notification.