



ÅRSREGNSKAPET FOR REGNSKAPSÅRET 2021 - GENERELL INFORMASJON

Enheten

Organisasjonsnummer: 913 062 612
Organisasjonsform: Aksjeselskap
Foretaksnavn: NEC ONCOIMMUNITY AS
Forretningsadresse: Ullernchausséen 64
0379 OSLO

Regnskapsår

Årsregnskapets periode: 01.04.2020 - 31.03.2021

Konsern

Morselskap i konsern: Nei

Regnskapsregler

Regler for små foretak benyttet: Ja
Benyttet ved utarbeidelsen av årsregnskapet til selskapet: Regnskapslovens alminnelige regler

Årsregnskapet fastsatt av kompetent organ

Bekreftet av representant for selskapet: Richard Stratford
Dato for fastsettelse av årsregnskapet: 02.07.2021

Grunnlag for avgivelse

År 2021: Årsregnskapet er elektronisk innlevert
År 2020: Tall er hentet fra elektronisk innlevert årsregnskap fra 2021

Det er ikke krav til at årsregnskapet m.v. som sendes til Regnskapsregisteret er undertegnet. Kontrollen på at dette er utført ligger hos revisor/enhetens øverste organ. Sikkerheten ivaretas ved at innsender har rolle/rettighet for innsending av årsregnskapet via Altinn, og ved at det bekreftes at årsregnskapet er fastsatt av kompetent organ.

Brønnøysundregistrene, 03.02.2023



Resultatregnskap

Beløp i: NOK	Note	2021	2020
RESULTATREGNSKAP			
Inntekter			
Revenue		7 329 624	210 400
Other operating income	2	10 222 176	15 452 856
Sum inntekter		17 551 800	15 663 256
Kostnader			
Personnel costs	3	17 402 599	30 662 941
Depreciations	4	135 331	489 887
Nedskrivning av varige driftsmidler og immaterielle eiendeler	4		
Other operating costs	3	20 766 596	21 170 125
Sum kostnader		38 304 525	52 322 954
Driftsresultat		-20 752 726	-36 659 698
Finansinntekter og finanskostnader			
Annen renteinntekt		39 088	34 919
Other financial income		351 854	4 534 939
Sum finansinntekter		390 942	4 569 858
Annen rentekostnad		165	160 834
Other financial expenses		930 530	3 952 452
Sum finanskostnader		930 695	4 113 286
Netto finans		-539 753	456 572
Ordinært resultat før skattekostnad		-21 292 479	-36 203 126
Tax on ordinary result	5		
Ordinært resultat etter skattekostnad		-21 292 479	-36 203 126
Årsresultat	6	-21 292 479	-36 203 126
Årsresultat etter minoritetsinteresser		-21 292 479	-36 203 126
Totalresultat		-21 292 479	-36 203 126



Resultatregnskap

Beløp i: NOK	Note	2021	2020
Overføringer og disponeringer			
Udekket tap		-21 292 479	-36 203 126
Sum overføringer og disponeringer		-21 292 479	-36 203 126



Balanse

Beløp i: NOK	Note	2021	2020
BALANSE - EIENDELER			
Anleggsmidler			
Immaterielle eiendeler			
Utsatt skattefordel	5		
Varige driftsmidler			
Equipment and fixed assets	4	250 807	301 866
Sum varige driftsmidler	4	250 807	301 866
Sum anleggsmidler		250 807	301 866
Omløpsmidler			
Varer			
Fordringer			
Accounts receivables		6 771 393	922 900
Other short-term receivables		7 609 168	7 410 031
Sum fordringer		14 380 560	8 332 931
Bankinnskudd, kontanter og lignende			
Cash and bank deposits	8	23 329 855	44 193 031
Sum bankinnskudd, kontanter og lignende		23 329 855	44 193 031
Sum omløpsmidler		37 710 415	52 525 961
SUM EIENDELER		37 961 222	52 827 827
BALANSE - EGENKAPITAL OG GJELD			
Egenkapital			
Innskutt egenkapital			
Share capital	6, 7	283 696	283 696
Overkurs	6	20 994 626	91 297 659
Sum innskutt egenkapital		21 278 322	91 581 355



Balanse

Beløp i: NOK	Note	2021	2020
Opptjent egenkapital			
Result brought forward (aut)			
Udekket tap			49 010 554
Sum opptjent egenkapital			-49 010 554
Sum egenkapital	6	21 278 322	42 570 801
Gjeld			
Langsiktig gjeld			
Utsatt skatt	5		
Annen langsiktig gjeld			
Sum langsiktig gjeld		0	0
Kortsiktig gjeld			
Leverandørgjeld		4 830 026	1 019 642
Tax payable	5		
Public duties payable		669 650	207 484
Other current liabilities		11 183 224	9 029 900
Sum kortsiktig gjeld		16 682 900	10 257 026
Sum gjeld		16 682 900	10 257 026
SUM EGENKAPITAL OG GJELD		37 961 222	52 827 827



Brønnøysundregistrene

ÅRSREGNSKAP FOR REGNSKAPSÅRET 2021 - GENERELL INFORMASJON

Journalnummer: 2021 882288

Enheten

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Organisasjonsform: Aksjeselskap
Foretaksnavn: NEC ONCOIMMUNITY AS
Forretningsadresse: Ullernchausséen 64
0379 OSLO

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årsregnskapet til selskapet: Regnskapslovens alminnelige regler

Årsregnskapet fastsatt av kompetent organ

Bekreftet av representant for selskapet: Richard Stratford
Dato for fastsettelse av årsregnskapet: 02.07.2021

Grunnlag for avgivelse

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År 2020: Tall er hentet fra elektronisk innlevert årsregnskap fra 2021.

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Brønnøysundregistrene, 30.10.2021



Organisasjonsnr: 913 062 612
NEC ONCOIMMUNITY AS

RESULTATREGNSKAP

Beløp i: NOK	Note	2021	2020
RESULTATREGNSKAP			
Inntekter			
Revenue		7 329 624	210 400
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Totalresultat		-21 292 479	-36 203 126
Overføringer og disponeringer			
Udekket tap		-21 292 479	-36 203 126
Sum overføringer og disponeringer		-21 292 479	-36 203 126



Organisasjonsnr: 913 062 612
NEC ONCOIMMUNITY AS

BALANSE

Beløp i: NOK Note 2021 2020

BALANSE - EIENDELER

Anleggsmidler

Immaterielle eiendeler

Utsatt skattefordel 5

Varige driftsmidler

Equipment and fixed assets 4 250 807 301 866

Sum varige driftsmidler 4 250 807 301 866

Sum anleggsmidler 250 807 301 866

Omløpsmidler

Varer

Fordringer

Accounts receivables 6 771 393 922 900

Other short-term receivables 7 609 168 7 410 031

Sum fordringer 14 380 560 8 332 931

Bankinnskudd, kontanter og lignende

Cash and bank deposits 8 23 329 855 44 193 031

Sum bankinnskudd, kontanter og lignende 23 329 855 44 193 031

Sum omløpsmidler 37 710 415 52 525 961

SUM EIENDELER 37 961 222 52 827 827

BALANSE - EGENKAPITAL OG GJELD

Egenkapital

Innskutt egenkapital

Share capital 6, 7 283 696 283 696

Overkurs 6 20 994 626 91 297 659

Sum innskutt egenkapital 21 278 322 91 581 355

Opptjent egenkapital

Result brought forward

(aut)

Udekket tap 49 010 554

Sum opptjent egenkapital -49 010 554

Sum egenkapital 6 21 278 322 42 570 801

Gjeld



Langsiktig gjeld			
Utsatt skatt	5		
Annen langsiktig gjeld			
Sum langsiktig gjeld		0	0
Kortsiktig gjeld			
Leverandørgjeld		4 830 026	1 019 642
Tax payable	5		
Public duties payable		669 650	207 484
Other current liabilities		11 183 224	9 029 900
Sum kortsiktig gjeld		16 682 900	10 257 026
Sum gjeld		16 682 900	10 257 026
SUM EGENKAPITAL OG GJELD		37 961 222	52 827 827



Organisasjonsnr: 913 062 612
NEC ONCOIMMUNITY AS

NOTEOPPLYSNINGER - SELSKAP - alle poster oppgitt i hele tall

Note

Antall årsverk i regnskapsåret

Virksomheten har hatt følgende antall årsverk:
16.00



Annual Report 2021

NEC Oncoimmunity AS

Income statement
Balance sheet
Notes to the financial statement

Org.no.: 913 062 612



Income statement			
NEC Oncoimmunity AS			
Operating income and expenses	Note	01.04.20 -31.03.21	01.01.19 - 31.03.20
Revenue		7 329 624	210 400
Other operating income	2	10 222 176	15 452 856
Total operating income		17 551 800	15 663 256
Personnel costs	3	17 402 599	30 662 941
Depreciations	4	135 331	489 887
Other operating costs	3	20 766 596	21 170 125
Total operating costs		38 304 525	52 322 954
Operating profit		-20 752 726	-36 659 698
Financial income and expenses			
Other interest income		39 088	34 919
Other financial income		351 854	4 534 939
Other interest expenses		165	160 834
Other financial expenses		930 530	3 952 452
Net financial items		-539 753	456 572
Operating result before tax		-21 292 479	-36 203 126
Tax on ordinary result	5	0	0
Ordinary result after tax		-21 292 479	-36 203 126
Net losses	6	-21 292 479	-36 203 126
Transfers and allocations			
Losses brought forward		21 292 479	36 203 126
Total transfers and allocations		-21 292 479	-36 203 126
NEC Oncoimmunity AS		Side 2	



Balance sheet			
NEC Oncoimmunity AS			
Assets	Note	31.03.2021	31.03.2020
Fixed assets			
Tangible fixed assets			
Equipment and fixed assets	4	250 807	301 866
Total tangible fixed assets	4	<u>250 807</u>	<u>301 866</u>
Total fixed assets		<u>250 807</u>	<u>301 866</u>
Current assets			
Short term receivables			
Accounts receivables		6 771 393	922 900
Other short-term receivables		7 609 168	7 410 031
Total short term receivables		<u>14 380 560</u>	<u>8 332 931</u>
Cash and bank deposits	8	23 329 855	44 193 031
Total current assets		<u>37 710 415</u>	<u>52 525 961</u>
Total assets		<u>37 961 222</u>	<u>52 827 827</u>



Balance sheet			
NEC Oncoimmunity AS			
Equity and liabilities	Note	31.03.2021	31.03.2020
Paid in equity			
Share capital	6, 7	283 696	283 696
Share premium reserve	6	20 994 626	91 297 659
Total paid in equity		21 278 322	91 581 355
Retained earnings			
Uncovered loss		0	-49 010 554
Total retained earnings		0	-49 010 554
Total equity	6	21 278 322	42 570 801
Liabilities			
Current liabilities			
Trade creditors		4 830 026	1 019 642
Public duties payable		669 650	207 484
Other current liabilities		11 183 224	9 029 900
Total current liabilities		16 682 900	10 257 026
Total liabilities		16 682 900	10 257 026
Total equity and liabilities		37 961 222	52 827 827
Oslo, 28.06.2021			
<u>Richard Stratford (sign)</u> Managing director	<u>Akira Kitamura (sign)</u> chairman of the board	<u>Naoko Yamagata (sign)</u> member of the board	
<u>Trevor Clancy (sign)</u> member of the board	<u>Juergen Wilhelm Quittek (sign)</u> member of the board		
NEC Oncoimmunity AS		Page 4	



NEC Oncoimmunity AS

Note 1 Accounting principles

The annual accounts have been prepared in accordance with the Accounting Act and NRS 8 - Good accounting practice for small companies.

NEC Oncoimmunity AS is included in the consolidated financial statement of NEC Corporation. The financial statement can be downloaded from the following web address:
<https://www.nec.com/en/global/ir/library/annual/index.html>

Change of accounting period

Effective from January 1, 2019 the company changed its accounting year to April 1 - March 31. Hence the comparables covers the 18 months accounting period from January 1, 2019 until March 31, 2020 and has not been updated to be comparable to current year period.

Foreign currency

Monetary foreign currency items are valued at the exchange rate on the balance sheet date.

Operating revenues

Income from services are recognised as revenues as they are delivered.
Grants are recognised and classified as other operating revenues as they are earned.

Tax

The tax charge in the profit and loss account consists of tax payable for the period and the change in deferred tax. Deferred tax is calculated at the tax rate at 22 % on the basis of tax-reducing and tax-increasing temporary differences that exist between accounting and tax values, and the tax loss carried forward at the end of the accounting year. Tax-increasing and tax-reducing temporary differences that reverse or may reverse in the same period are set off and entered net.

Classification and valuation of fixed assets

Fixed assets include assets included for long-term ownership and use. Property, plant and equipment are recognized in the balance sheet at its cost of acquisition and depreciated over the asset's economic lifetime. Property, plant and equipment are written down to a recoverable amount in the case of decrease in value which is expected not to be temporary. The recoverable amount is the higher of the realisable value less cost to sell and the value in use. Value in use is the present value of future cash flows related to the asset. Write-downs are reversed when the basis for the write-down is no longer present.

Classification and valuation of current assets

Current assets and short-term liabilities normally include items that fall due for payment within one year of the balance sheet date, as well as items that are related to inventory. Current assets are valued at the lower of acquisition cost and and recoverable amount.

Receivables

Receivables from customers and other receivables are recognized at par value after deducting a provision for expected losses. The provision for losses is made on the basis of an individual assessment of the respective receivables.



NEC Oncoimmunity AS

Note 2 Grants

Grants from	2020/2021	2019/2020
NRC - Norges Forskningsråd	5 354 840	5 510 000
SkatteFUNN	4 867 336	5 978 666
H2020 - EU-programme for research and innovation	0	3 964 190
Total grants	10 222 176	15 452 856

Note 3 Salary costs and benefits, remuneration to the chief executive, board and auditor

Salary costs	2020/2021	2019
Salaries	15 306 762	27 169 013
Employment tax	1 728 705	2 945 335
Pension costs	226 715	241 855
Other benefits	140 418	306 739
Total	17 402 599	30 662 941

In 2020/2021 the company employed 16 full time employees.

Pension liabilities

The company is liable to maintain an occupational pension scheme under the Mandatory Occupational Pensions Act. The company's pension schemes satisfy the requirements of this Act.

Remuneration to leading personnel	Managing director	Executive director
Salaries	1 883 799	1 883 799
Pension costs	37 500	37 500
Other remuneration	4 392	4 392
Total	1 925 691	1 925 691

Auditor

Audit fees expensed for 2020 / 2021 amount to NOK 253 500 (VAT excl.).

In addition there is a fee for other services amount to NOK 102 365 (VAT excl.)

Note 4 Fixed assets

	Fixtures and fittings	Office machines	Total
Purchase cost as of 01.04.2020	361 330	390 407	751 737
Additions		84 272	84 272
Acquisition cost 31.03.2021	361 330	474 679	836 009
Accumulated depreciation 31.03.2021	217 671	367 530	585 201
NEC Oncoimmunity AS			Page 6



NEC Oncoimmunity AS

Net book value 31.03.2021	361 330	474 679	836 009
This year's ordinary depreciations	59 858	75 473	135 331
Assessed economic life	Up to 5 years	Up to 3 years	
Depreciation method	Linearly	Linearly	

Note 5 Tax

Tax expense	2020/2021	2019/2020
Recognized tax on ordinary profit/loss:		
Payable tax	0	0
Too much/little allocated previous years	0	0
Changes in deferred tax assets	0	0
Tax expense on ordinary profit/loss	0	0

Taxable income:		
Ordinary result before tax	-21 292 479	-36 203 126
Permanent differences	-4 894 998	-3 586 274
Changes in temporary differences	954 275	359 942
Taxable income	-25 233 202	-39 429 458

Payable tax in the balance sheet:		
Current taxes payable	0	0
Total payable tax in the balance sheet	0	0

The tax effect of temporary differences and loss for to be carried forward that has formed the basis for deferred tax and deferred tax advantages, specified on type of temporary differences

	31.03.2021	31.03.2020	Difference
Tangible assets	-52 656	-98 381	-45 725
Other temporary differences	-1 000 000	0	1 000 000
Total temporary differences	-1 052 656	-98 381	954 275

Accumulated loss to be brought forward	-87 875 085	-62 440 218	25 434 867
Temporary differences not recognised as deferred tax assets	88 927 741	62 538 599	-26 389 142

Recognised deferred tax assets	0	0	0
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NEC Oncoimmunity AS

Note 6 Equity capital

	Share capital	Share premium reserve	Uncovered loss	Total equity
As at 31.03.2020	283 696	91 297 659	-49 010 554	42 570 801
Transferred from Share Premium		-49 010 554	49 010 554	
Net loss		-21 292 479		-21 292 479
As at 31.03.2021	283 696	20 994 626	0	21 278 322

Note 7 Shareholders

The share capital in NEC Oncoimmunity AS as of 31 March 2021 consists of:

	Total	Nominal value per share	Entered
Ordinary shares	2 720 086	0,10	272 009
B-shares	116 867	0,10	11 687
Total	2 836 953		283 695

Ownership structure

	Ordinary shares	B-shares	Total	Owner interest	Share of votes
Stratford Holdings AS	0	58 433	58 433	2,05	0,0
TJC Holding AS	0	58 434	58 434	2,05	0,0
NEC Corporation	2 720 499	0	2 720 499	95,90	100,0
Total number of shares	2 720 499	116 867	2 837 366	100,0	100,0

Stratford Holdings AS is fully owned by the managing director of NEC Oncoimmunity AS.

TJC Holdings AS is fully owned by Trevor Clancy, member of the board.

The B-shares have equal rights as ordinary shares for dividends, but no voting rights.

Note 8 Cash and cash equivalents

Deposits to cover withheld employee taxes are restricted from other uses and amounts to NOK 355 865 at 31.03.2021.



NEC Oncoimmunity AS

Note 9 EU-grant

The company received a 30-month EU grant starting from May 2019 for total of EUR 2.2 million with a cost coverage of 70% of project related costs. The company have received a prepayment of this grant from EU of EUR 1.0 million in April 2020. The EU decided to terminate the grant as of December 24, 2019 due to the acquisition where NEC Corporation became the owner of 100% of the ordinary shares in the company. At 31.03.2021 an amount of NOK 5.7 million in remaining received prepayment is included as a short term liability in the balance sheet, awaiting repayment to the EU as a consequence of the termination.

Note 10 Related party transactions

In 2020/2021, NEC Oncoimmunity AS had revenue from NEC Corporation of NOK 7 028 376.

NEC Corporation invoiced NEC Oncoimmunity AS NOK 508 383 in 2020/2021.

As of 31.03.2021, NEC Oncoimmunity AS have NOK 5 693 682 in net short term receivables against NEC Corporation.

Note 11 Subsequent events

The financial statements of NEC Oncoimmunity AS are prepared under the assumption that the company will continue as a going concern and the board of directors confirms that this assessment is appropriate. The company has not yet reached cash positive generating operations and is dependent on future financial support from its shareholders. Management and the Board of Directors will initiate necessary measures to ensure a sufficient level of liquidity to fund planned activities over the coming 12 months.



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To the General Meeting of NEC Oncoimunity AS

Independent auditor's report

Report on the Audit of the Financial Statements

Opinion

We have audited the financial statements of NEC Oncoimunity AS showing a loss of NOK 21 292 479. The financial statements comprise the balance sheet as at 31 March 2021, the income statement for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements are prepared in accordance with law and regulations and give a true and fair view of the financial position of the Company as at 31 March 2021, and its financial performance for the year then ended in accordance with the Norwegian Accounting Act and accounting standards and practices generally accepted in Norway.

Basis for Opinion

We conducted our audit in accordance with laws, regulations, and auditing standards and practices generally accepted in Norway, including International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Company as required by laws and regulations, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Responsibilities of the Board of Directors and the Managing Director for the Financial Statements

The Board of Directors and the Managing Director (management) are responsible for the preparation in accordance with law and regulations, including a true and fair view of the financial statements in accordance with the Norwegian Accounting Act and accounting standards and practices generally accepted in Norway, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern. The financial statements use the going concern basis of accounting insofar as it is not likely that the enterprise will cease operations.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with laws, regulations, and auditing standards and practices generally accepted in Norway, including ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with laws, regulations, and auditing standards and practices generally accepted in Norway, including ISAs, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error. We design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting

Offices in:

KPMG AS is a Norwegian limited liability company, and member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity.

Statsautoriserte revisorer - medlemmer av Den norske Revisorforening

Oslo	Liverpool	Moscow	Stord
Asta	London	Norway	Straume
Ås	Madrid	Osaka	Trondheim
Bergen	Munich	San Francisco	Tromsø
Bodo	Norway	Sao Paulo	Tysset
Drammen	Osaka	Shanghai	Ålesund



a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control.
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves a true and fair view.

We communicate with the Board of Directors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Report on Other Legal and Regulatory Requirements

Opinion on Registration and Documentation

Based on our audit of the financial statements as described above, and control procedures we have considered necessary in accordance with the International Standard on Assurance Engagements (ISAE) 3000, *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*, it is our opinion that management has fulfilled its duty to produce a proper and clearly set out registration and documentation of the Company's accounting information in accordance with the law and bookkeeping standards and practices generally accepted in Norway.

Oslo, 2 July 2021
KPMG AS

John Thomas Sørhaug
State Authorised Public Accountant



Skatteetaten

Vår dato 09.07.2020	Din/Deres dato 01.07.2020	Saksbehandler Vibeke Horne
800 80 000 Skatteetaten.no	Din/Deres referanse AR380391652	Telefon 32212250
Org.nr 974761076	Vår referanse 2020/5617063	Postadresse Postboks 9200 Grønland 0134 OSLO

NEC ONCOIMMUNITY AS
Ullernchausséen 64
0379 OSLO

Att. Hans Kristian Gjerstad

Tillatelse til å utarbeide årsregnskap og årsberetning på engelsk for NEC Oncoimmunity, org.nr. 913 062 612

Vi viser til deres brev av 1. juli 2020 der det søkes om dispensasjon fra kravet til å utarbeide årsregnskap og årsberetning på norsk for NEC Oncoimmunity AS. Søknaden ble sendt til Skattedirektoratet. Skattedirektoratets myndighet til å treffe enkeltvedtak etter regnskapsloven § 3-4 tredje ledd ble delegert til skattekontoret med virkning fra 1. juni 2019.

Skattekontoret gir på bakgrunn av en konkret helhetsvurdering NEC Oncoimmunity AS dispensasjon fra kravet til å utarbeide årsregnskap og årsberetning på norsk, jf. regnskapsloven § 3-4 tredje ledd. Dispensasjonen gjelder så lenge opplysningene som danner grunnlaget for vedtaket ikke endres vesentlig.

Kopi av dette brevet må sendes til Regnskapsregisteret i Brønnøysund sammen med årsregnskapet.

Bakgrunn

NEC Oncoimmunity AS er eid av utenlandske og norske profesjonelle aktører. Selskapet driver virksomhet knyttet til forskning og utvikling innen medisinsk software. Engelsk er selskapets arbeidsspråk. Selskapet har bedriftskunder og kommunikasjon foregår på engelsk. Flere av styremedlemmene i selskapet er utenlandske.

Skattekontorets vurdering

Etter regnskapsloven § 3-4 tredje ledd skal "årsregnskapet og årsberetningen [...] være på norsk. Departementet kan ved [...] enkeltvedtak bestemme at årsregnskapet og/eller årsberetningen kan være på et annet språk."

I Ot. prp. nr. 42 (1997-1998) Om lov om årsregnskap mv., er det uttalt følgende om regnskapslovens formål, jf. pkt. 1.1:

"Regjeringen har som siktemål at regnskapsloven skal bidra til informative regnskaper for ulike grupper av regnskapsbrukere. Regnskapsbrukerne er dels investorer og kreditorer som tilfører kapital til foretakene, og dels andre grupper som har interesse av å vite hvordan foretaket drives, f.eks. de ansatte og lokalsamfunnet. Informasjonen til kapitalmarkedet skal gi grunnlag for riktig prising av finansielle objekter. Riktig prisdannelse på aksjer er en forutsetning for at ressursbruken i



samfunnsøkonomien skal bli best mulig. Gode regnskaper vil også gjøre det vanskeligere for markedsdeltakere å ta ut spekulasjonsgevinster med basis i skjevt fordelt informasjon.”

Det fremgår således at et av hovedformålene med regnskapsloven er å bidra til "informative regnskaper for ulike grupper av regnskapsbrukere". Regnskapsbrukere vil omfatte, jf. uttalelsen i proposisjonen, blant andre investorer, kreditorer, ansatte og lokalsamfunnet.

Det er etter skattekontorets vurdering derfor avgjørende ved vurdering av om dispensasjon fra kravet til å utarbeide årsregnskap og/eller årsberetning på norsk kan gis, at det ikke foreligger mulige brukere av regnskapsinformasjon som blir vesentlig berørt negativt ved en eventuell dispensasjon.

Det er særlig hensynet til brukerne av regnskapsinformasjon som skal vurderes ved en dispensasjonssøknad. I denne vurderingen har skattekontoret lagt særlig vekt på at selskapet har norske og utenlandske profesjonelle eiere. Videre er det vektlagt at selskapet driver virksomhet i en bransje der alle sentrale aktører behersker og benytter engelsk.

Vennligst oppgi vår referanse ved henvendelse i saken.

Med hilsen

Vibeke Horne
rådgiver
Brukerdialog, brukerkontakt
Skatteetaten

Dokumentet er elektronisk godkjent og har derfor ikke håndskrevne signaturer.