## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re OATLY GROUP AB SECURITIES		Consolidated Civil Action No.	
LITIGATION		1:21-cv-06360-AKH	
SUPREME COURT OF THE STATE OF NEW YO COUNTY OF NEW YORK	RK		

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BRUCE HIPPLE, Individually and on Behalf of All			Index No. 151432/2022
Others Similarly Situated, vs. OATLY GROUP AB, et al.,	Plaintiff,	:	CLASS ACTION Justice Andrew Borrok
	Defendants.	X	

## **PROOF OF CLAIM AND RELEASE**

## I. GENERAL INSTRUCTIONS

1. To recover as a Member of the Settlement Class based on your claims in the actions titled *In re Oatly Group AB Securities Litigation*, Case No. 1:21-cv-06360-AKH (S.D.N.Y.) and *Hipple v. Oatly Group AB, et al.*, Index No. 151432/2022 (Sup. Ct. N.Y.) (the "Actions"), you must complete and, on page 10 hereof, sign this Proof of Claim and Release ("Proof of Claim"). If you fail to submit a properly addressed (as set forth in paragraph 3 below) Proof of Claim, postmarked or received by the date shown below, your claim may be rejected and you may be precluded from any recovery from the Net Settlement Fund created in connection with the proposed settlement of the Actions (the "Settlement").<sup>1</sup>

2. Submission of this Proof of Claim, however, does not assure that you will share in the proceeds of the Settlement.

3. YOU MUST MAIL OR SUBMIT ONLINE YOUR COMPLETED AND SIGNED PROOF OF CLAIM, ACCOMPANIED BY COPIES OF THE DOCUMENTS REQUESTED HEREIN, NO LATER THAN JULY 25, 2024, TO THE COURT-APPOINTED CLAIMS ADMINISTRATOR IN THIS CASE, AT THE FOLLOWING ADDRESS:

> Oatly Securities Settlement Claims Administrator c/o Gilardi & Co. LLC P.O. Box 301170 Los Angeles, CA 90030-1170 Online Submissions: www.OatlySecuritiesSettlement.com

<sup>&</sup>lt;sup>1</sup> This Proof of Claim and Release incorporates by reference the definitions in the Stipulation of Settlement ("Stipulation"), which can be obtained at www.OatlySecuritiesSettlement.com.

Do not mail or deliver your Proof of Claim to the Court, the Parties to the Actions, or their counsel. Submit your Proof of Claim only to the Claims Administrator at the address set forth above. If you are NOT a Member of the Settlement Class (as defined below and in the Notice of Pendency and Proposed Settlement of Class Action (the "Notice")), DO NOT submit a Proof of Claim.

4. If you are a Member of the Settlement Class and you do not request exclusion, you will be bound by the terms of any judgment entered in the Actions, including the releases provided therein, WHETHER OR NOT YOU SUBMIT A PROOF OF CLAIM.

5. It is important that you completely read and understand the Notice that accompanies this Proof of Claim, including the Plan of Allocation of the Net Settlement Fund set forth in the Notice. The Notice describes the proposed Settlement, how Settlement Class Members are affected by the Settlement, and the manner in which the Net Settlement Fund will be distributed if the Settlement and Plan of Allocation are approved by the Federal Court. The Notice (as well as the Stipulation) also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Proof of Claim. By signing and submitting this Proof of Claim, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein.

## II. CLAIMANT IDENTIFICATION

You are a Member of the Settlement Class if you: (i) purchased or acquired Oatly American Depositary Shares ("ADS") between May 20, 2021 and November 15, 2021, inclusive (the "Class Period"), or otherwise pursuant to Oatly's Offering Documents for its May 20, 2021 initial public offering ("IPO"), and were damaged thereby (the "ADS Class"); or (ii) purchased or acquired call options on Oatly ADS or sold put options on Oatly ADS during the Class Period, or otherwise pursuant to Oatly's Offering Documents, and were damaged thereby (the "Options Class," and with the ADS Class, the "Settlement Class"). Excluded from the Settlement Class are Defendants; their respective successors and assigns; the past and current executive officers and directors of Oatly, Nativus Company Limited (and any of its subsidiaries or affiliates); and China Resources Verlinvest Health Investment Ltd. (and any of its subsidiaries or affiliates); the Underwriter Defendants; the Immediate Family Members of the Individual Defendants and of Oatly's past and current executive officers and directors; the legal representatives, heirs, successors, or assigns of any excluded Person, and any entity in which any of the above excluded Persons have or had a controlling interest, and the legal representatives, heirs, successors-in-interest or assigns of any such excluded Persons, provided, however, that any Investment Vehicle shall not be excluded from the Settlement Class. Also excluded from the Settlement Class is any Person who would otherwise be a Member of the Settlement Class but who validly and timely requests exclusion in accordance with the requirements set by the Court.

Use Part I of this Proof of Claim entitled "Claimant Identification" to identify each purchaser, acquirer or seller of record ("nominee"), if different from the beneficial purchaser, acquirer or seller of the Oatly securities which forms the basis of this claim. THIS CLAIM MUST BE FILED BY THE ACTUAL BENEFICIAL PURCHASER(S), ACQUIRERS OR SELLER(S) OR THE LEGAL REPRESENTATIVE OF SUCH PURCHASER(S), ACQUIRER(S) OR SELLER(S) OF THE OATLY SECURITIES UPON WHICH THIS CLAIM IS BASED.

All joint purchasers, acquirers or sellers must sign this Proof of Claim. Executors, administrators, guardians, conservators and trustees must complete and sign this Proof of Claim on behalf of persons represented by them and their authority must accompany this Proof of Claim and their titles or capacities must be stated. The last four digits of the Social Security Number (or full Taxpayer Identification Number) and telephone number of the beneficial owner may be used in verifying the claim. Failure to provide the foregoing information could delay verification of your claim or result in rejection of the claim.

If you are acting in a representative capacity on behalf of a Member of the Settlement Class (for example, as an executor, administrator, trustee, or other representative), you must submit evidence of your current authority to act on behalf of that Member of the Settlement Class. Such evidence would include, for example, letters testamentary, letters of administration, or a copy of the trust documents.

One Proof of Claim should be submitted for each separate legal entity. Separate Proofs of Claim should be submitted for each separate legal entity (*e.g.*, a claim from joint owners should not include separate transactions of just one of the joint owners, and an individual should not combine his or her IRA transactions with transactions made solely in the individual's name). Conversely, a single Proof of Claim should be submitted on behalf of one legal entity, including all transactions made by that entity on one Proof of Claim, no matter how many separate accounts that entity has (*e.g.*, a corporation with multiple brokerage accounts should include all transactions made in all accounts on one Proof of Claim).

NOTICE REGARDING ELECTRONIC FILES: Certain claimants with large numbers of transactions may request to, or may be requested to, submit information regarding their transactions in electronic files. All claimants MUST submit a manually signed paper Proof of Claim listing all their transactions whether or not they also submit electronic copies. If you wish to file your Proof of Claim electronically, you must contact the Claims Administrator at edata@gilardi.com to obtain the mandatory file layout. Any file not in accordance with the required electronic filing format will be subject to rejection. Only one Proof of Claim should be submitted for each legal entity (see above) and the complete name of the beneficial owner(s) of the securities must be entered where called for. Distribution payments must be made by check or electronic payment payable to the Authorized Claimant (beneficial account owner). The Third Party Filer shall not be the payee of any distribution payment check or electronic distribution payment. No electronic files will be considered to have been properly submitted unless the Claims Administrator issues to the claimant a written acknowledgement of receipt and acceptance of electronically submitted data. Do not assume that your file has been received until you receive this notification. If you do not receive such an email within 10 days of your submission you should contact the electronic filing department at www.OatlySecuritiesSettlement.com to inquire about your file and confirm it was received.

## III. CLAIM FORM

Use Parts II and III of this Proof of Claim entitled "Schedule of Transactions in Oatly ADS," and "Schedule of Transactions in Exchange-Traded Oatly Options" to supply all required details of your transaction(s) in Oatly Securities. If you need more space or additional schedules, attach separate sheets giving all of the required information in substantially the same form. Sign and print or type your name on each additional sheet.

On the schedules, provide all of the requested information with respect to **all** of your holdings, purchases or acquisitions, and **all** of your sales of Oatly Securities, whether such transactions resulted in a profit or a loss. Failure to report all such transactions may result in the rejection of your claim.

List these transactions separately and in chronological order, by trade date, beginning with the earliest. You must accurately provide the month, day, and year of each transaction you list.

For short-sale transactions, the date of covering a "short sale" is deemed to be the date of purchase of Oatly ADS, and the date of a "short sale" is deemed to be the date of sale of Oatly ADS.

For each transaction, you must provide, together with this Proof of Claim, copies of stockbroker confirmation slips, stockbroker statements, or other documents adequately evidencing your transactions in Oatly Securities. If any such documents are not in your possession, please obtain a copy or equivalent documents from your broker because these documents are necessary to prove and process your claim. Failure to provide this documentation could delay verification of your claim or result in rejection of your claim. THE PARTIES DO NOT HAVE INFORMATION ABOUT YOUR TRANSACTIONS IN OATLY SECURITIES.

PLEASE NOTE: As set forth in the Plan of Allocation, each Authorized Claimant shall receive his, her or its *pro rata* share of the Net Settlement Fund. If the prorated payment to any Authorized Claimant calculates to less than \$10.00, it will not be included in the calculation and no distribution will be made to that Authorized Claimant.

Official Office Use Only

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK In re Oatly Group AB Securities Litigation

Civil Action No. 1:21-cv-06360-AKH

**PROOF OF CLAIM AND RELEASE FORM** 

Must Be Postmarked (if Mailed) or Received (if Submitted Online) No Later Than July 25, 2024



Please Type or Print in the Boxes Below Must use Black or Blue Ink or your claim may be deemed deficient.

## REMEMBER TO ATTACH COPIES OF BROKER CONFIRMATIONS OR OTHER DOCUMENTATION OF YOUR TRANSACTIONS IN OATLY SECURITIES. FAILURE TO PROVIDE THIS DOCUMENTATION COULD DELAY VERIFICATION OF YOUR CLAIM OR **RESULT IN REJECTION OF YOUR CLAIM.**

PART I. CLAIMANT IDENTIFICATION					
Last Name	I	M.I. F	First Name		
Last Name (Co-Beneficial Owner)		M.I. F	irst Name (Co-Bene	eficial Owner)	
IRA Joint Tenancy Em		Individua	I Other		
,			-	(specify)	
Company Name (Beneficial Owner - If Claimant is	not an individual) or	Custodia	n Name II an IRA	(opeony)	
Trustee/Asset Manager/Nominee/Record Owner's	Name (If Different fro	om Benef	icial Owner Listed A	bove)	
Account#/Fund# (Not Necessary for Individual File	ers)				
Last Four Digits of Social Security Number	Taxpayer Identification	on Numb	er		
or					
Telephone Number (Primary Daytime)	Telephone Numb	er (Altern	ate)		
Email Address					
Address MAILING INFORMATION					
Address (cont.)					
City		State	ZIP Code		
City		State	ZIP Code		
			E		
Foreign Province	Foreign Postal Code		Foreign Co	ountry Name/Abbre	eviation
FOR CLAIMS	BE FL	OP			FOR CLAIMS
		RE SH		YYYY	PROCESSING ONLY
	5				

## - PURCHASES Total Purchase or Acquisition Price Proof of Trade Date(s) Number of Shares (Excluding commissions, Purchase (List Chronologically) Purchased or Acquired taxes and fees) Enclosed? D D Y YYY M M Y 1. \$ 00 Ν Y 2. \$ 00 Ν Y 3. \$ 00 N Y 4. \$ 00 Ν Y 5. \$ 00 Ν IMPORTANT: (i) If any purchase listed covered a "short sale," please mark Yes: Yes (ii) If you received shares through an acquisition or merger, please identify the date, the share amount, and the company acquired: M M D D Y Y Y Merger Shares: Company: Y Β. Sales of Oatly ADS between May 20, 2021 and February 22, 2022, inclusive: SALES **Total Sales Price** Proof of Trade Date(s) Number of (Excluding commissions, Sales (List Chronologically) Shares Sold taxes and fees) Enclosed? Y Y Μ Y Y Μ D D Y 1. \$ 00 Ν Y \$ 00 2. Ν Y \$ 00 3. Ν Y 00 4. \$ Ν Y 5. \$ \_ 00 Ν C. Number of Oatly ADS held at the close of Proof Enclosed? Υ trading on November 15, 2021: Ν D. Number of Oatly ADS held at the close of Proof Enclosed? Y trading on February 22, 2022: Ν

## PART II. SCHEDULE OF TRANSACTIONS IN OATLY ADS

A. Purchases or acquisitions of Oatly ADS between May 20, 2021 and February 22, 2022, inclusive:<sup>2</sup>

If you require additional space, attach extra schedules in the same format as above. Sign and print your name on each additional page.

YOU MUST READ AND SIGN THE RELEASE ON PAGE 10. FAILURE TO SIGN THE RELEASE MAY RESULT IN A DELAY IN PROCESSING OR THE REJECTION OF YOUR CLAIM.

Information requested about your purchases on November 15, 2021 through and including the close of trading on February 22, 2022 is needed only in order for the Claims Administrator to confirm that you have reported all relevant transactions. Purchases during this period are not eligible for a recovery because they were made outside the Class Period.



PART III. SCHEDULE OF TRANSACTIONS IN EXCHANGE-TRADED OATLY OPTIONS

# **PURCHASES/REPURCHASES**

I made the following purchases/repurchases of exchange-traded call options on Oatly ADS during the period from May 20, 2021 through and including Ŕ

	Proof of transaction Enclosed?	≻ z OO	≻ Z	≻ z	≻ z	≻ z ●●	≻ Z
	Assigned/Exercised Date (MM/DD/YY)						
	[X]expired [A]ssigned [E]xercised						
	Transaction price per option contract	-	_	_	_	_	_
	Strike Price	-	-	-	-	-	
	Expiry Date (MM/DD/YY)						
	Number of option contracts acquired						
February 22, 2022, inclusive:	Date(s) of transaction (List Chronologically) (MM/DD/YY)						
Febru	Option Type	Put Call	Call	Put Call	Put Call	Call	<ul><li>Put</li><li>Call</li></ul>

YOU MUST READ AND SIGN THE RELEASE ON PAGE 10. FAILURE TO SIGN THE RELEASE MAY RESULT IN A DELAY IN PROCESSING OR THE REJECTION OF YOUR CLAIM.

PART III. SCHEDULE OF TRANSACTIONS IN EXCHANGE-TRADED OATLY OPTIONS (CONT.)

## **SALES/WRITTEN**

I sold/wrote the following exchange-traded but options on Oatly ADS during the period from May 20, 2021 through and including Eebrulary 22, 2022, inclusive £

B. 1 Soldwrote schlamperchand notubring recturary 22, 2021, Introlle with and including February 22, 2022, Introlle with and including February 22, 2022, Introlle with and including February 22, 2021, Introlle with and including February 21, 2021, Intel wit	
gh and inc [X]sxpired [E]xercised	
IV 20, 2021 through and in Transaction price [A]ssigned per option contract [E]xercised	
Trail	
the period	
Expiry Date (MM/DD/YY)	
Number of option contracts acquired	
Wing exchansection ogically) or YY	
Wrote the following e Date(s) of transaction (List Chronologically) (MM/DD/YY)	
B. Isold/ Option Type Put Call Call Call Call Call Call Put Call Put	Call

YOU MUST READ AND SIGN THE RELEASE ON PAGE 10. FAILURE TO SIGN THE RELEASE MAY RESULT IN A DELAY IN PROCESSING OR THE REJECTION OF YOUR CLAIM.

If you require additional space, attach extra schedules in the same format as above. Sign and print your name on each additional page.

## IV. SUBMISSION TO JURISDICTION OF COURT AND ACKNOWLEDGMENTS

I (We) submit this Proof of Claim under the terms of the Stipulation described in the Notice. I (We) also submit to the jurisdiction of the United States District Court for the Southern District of New York with respect to my (our) claim as a Member of the Settlement Class and for purposes of enforcing the releases set forth herein. I (We) further acknowledge that I am (we are) bound by and subject to the terms of the Stipulation and any judgment that may be entered in the Actions, including the releases and the covenants set forth herein. I (We) agree to furnish additional information to the Claims Administrator to support this claim if requested to do so. I (We) have not submitted any other claim covering the same purchases, acquisitions or sale of Oatly ADS or options during the Class Period and know of no other Person having done so on my (our) behalf.

## V. RELEASES

1. I (We) hereby acknowledge full and complete satisfaction of, and do hereby fully, finally, and forever waive, compromise, settle, discharge, extinguish and release from the "Released Claims" (as defined below) each and all of the "Released Defendants' Parties" (as defined below).

2. "Released Claims" means all claims (including "Unknown Claims," as defined below), demands, losses, rights, damages, and causes of action of any nature whatsoever, whether in law or in equity, that have been or could have been asserted in either of the Actions or could in the future be asserted in any forum, whether foreign or domestic, whether arising under federal, state, common, or foreign law, by Federal Plaintiffs, State Plaintiff, any member of the Settlement Class, or their successors, assigns, executors, administrators, representatives, attorneys, and agents, in their capacities as such, whether brought directly or indirectly against any of the Released Defendants' Parties, that (a) arise out of, are based on, or relate in any way to any of the allegations, acts, transactions, facts, events, matters, occurrences, statements, representations, misrepresentations, or omissions involved, set forth, alleged or referred to, in either of the Actions, or which could have been alleged in the Actions, and (b) arise out of, are based on, or relate to (i) the purchase or acquisition of any Oatly Shares (x) during the Class Period, or (y) otherwise pursuant to the Offering Documents; or (ii) the purchase or acquisition of call options on Oatly Shares or the sale of put options on Oatly Shares (xx) during the Class Period, or (yy) otherwise pursuant to the Offering Documents. "Released Claims" does not, however, include claims to enforce the Settlement.

3. "Released Defendants' Claims" means all claims (including but not limited to Unknown Claims as defined below), demands, losses, rights, and causes of actions of any nature whatsoever by the Released Defendants' Parties or any of them against Plaintiffs, Settlement Class Members, or Plaintiffs' Counsel, which arise or relate in any way to the institution, prosecution, assertion, settlement or resolution of either of the Actions (except for any claims to enforce the Settlement).

4. "Released Defendants' Parties" means (i) Defendants, (ii) each of their respective Immediate Family Members (for individuals) and each of their direct or indirect parent entities, subsidiaries, related entities and affiliates, any trust of which any individual defendant is the settler or which is for the benefit of any Defendant and/or member(s) of his or her family, (iii) the unnamed underwriters of the IPO, and (iv) for any of the entities listed at (i), (ii), or (iii) their respective past and present general partners, limited partners, principals, shareholders, foundations, joint venturers, members, officers, directors, managers, managing members, managing directors, supervisors, employees, contractors, consultants, auditors, accountants, advisors (including without limitation financial and investment advisors), investment bankers, representatives, fiduciaries, insurers, reinsurers, trustees, trusts, trustors, trust beneficiaries, agents, attorneys (including Defendants' Counsel and all other counsel who have represented any current or former Defendant in the Actions, or in connection with any of the allegations in the Actions), professionals, predecessors, successors, assigns, heirs, executors, administrators, and any controlling person thereof, in their capacities as such, and any entity in which a Defendant has a controlling interest.

5. "Unknown Claims" means (i) any and all Released Claims against the Released Defendants' Parties that any Plaintiff or any Settlement Class Member does not know or suspect to exist in their, his, her, or its favor at the time of the release which, if known by such party, might have affected their, his, her or its decision with respect to the settlement and release of the Released Defendants' Parties, or might have affected such party's decision with respect to this Settlement, and (ii) any claims against the Released Plaintiffs' Parties that any Defendants does not know or suspect to exist in their, his, her or its favor, which if known by such party, might have affected their, his, her, or its decision(s) with respect to the settlement and release of the Released Plaintiffs' Parties. With respect to any and all Released Claims and Released Defendants' Claims, the Parties stipulate and agree that, upon the Effective Date, each Plaintiff and each Defendant shall expressly waive, and each Settlement Class Member shall be deemed to have waived, and by operation of the Judgment shall have waived, any and all provisions, rights, and benefits of Cal. Civ. Code §1542, which provides:

A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS THAT THE CREDITOR OR RELEASING PARTY DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE AND THAT, IF KNOWN BY HIM OR HER, WOULD HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR OR RELEASED PARTY;



and any and all provisions, rights, and benefits conferred by any law of any state or territory of the United States, or principle of common law, which is or has an effect which is similar, comparable, or equivalent to Cal. Civ. Code §1542. Plaintiffs and Settlement Class Members may hereafter discover facts, legal theories, or authorities in addition to or different from those which he, she, or it now knows or believes to be true with respect to the subject matter of the Released Claims, but Plaintiffs shall expressly fully, finally, and forever settle and release, and each Settlement Class Member, upon the Effective Date, shall be deemed to have, and by operation of the Final Judgment shall have, fully, finally, and forever settled and released, any and all Released Claims, known or unknown, suspected or unsuspected, contingent or non-contingent, whether or not concealed or hidden, which now exist, or heretofore have existed, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct which is negligent, reckless, intentional, with or without malice, or a breach of any duty, law, or rule, without regard to the subsequent discovery or existence of such different or additional facts, legal theories, or authorities. Plaintiffs and Defendants acknowledge, and Settlement Class Members shall be deemed to have acknowledged, that the inclusion of "Unknown Claims" in the definition of Released Claims and Released Defendants' Claims was separately bargained for and was a material element of the Settlement.

6. These releases shall be of no force or effect unless and until the Court approves the Stipulation and the Settlement becomes effective on the Effective Date.

7. I (We) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any claim or matter released pursuant to this release or any other part or portion thereof.

8. I (We) hereby warrant and represent that I (we) have included information about all of my (our) purchases, acquisitions and sales of Oatly Securities during the Class Period and the number of Oatly Securities held by me (us) at the close of trading on November 15, 2021 and February 22, 2022.

I (We) declare under penalty of perjury under the laws of the United States of America that the foregoing information supplied by the undersigned is true and correct.

Executed this day of	in				
(Month/Y	Year) (City/State/Country)				
(Sign your name here)	(Sign your name here)				
(Type or print your name here)	(Type or print your name here)				
(Capacity of person(s) signing, <i>e.g.</i> , Beneficial Purchaser or Acquirer, Executor or Administrato	(Capacity of person(s) signing, <i>e.g.</i> , br) Beneficial Purchaser or Acquirer, Executor or Administrator)				

## ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME. THANK YOU FOR YOUR PATIENCE.



## **Reminder Checklist:**

- 1. Please sign the above release and acknowledgment.
- 2. If this claim is being made on behalf of Joint Claimants, then both must sign.
- 3. Remember to attach copies of supporting documentation, if available.
- 4. Do not send originals of certificates.
- 5. Keep a copy of your Proof of Claim and all supporting documentation for your records.
- 6. If you desire an acknowledgment of receipt of your Claim Form, please send it Certified Mail, Return Receipt Requested.
- 7. If you move, please send your new address to the address below.
- 8. **Do not use red pen or highlighter** on the Proof of Claim or supporting documentation. Must use Black or Blue Ink or your claim may be deemed deficient.

## THIS PROOF OF CLAIM MUST BE SUBMITTED ONLINE OR MAILED NO LATER THAN JULY 25, 2024, ADDRESSED AS FOLLOWS:

Oatly Securities Settlement Claims Administrator c/o Gilardi & Co. LLC P.O. Box 301170 Los Angeles, CA 90030-1170 www.OatlySecuritiesSettlement.com



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