

Accounting Policy and Notes / Disclosures

to the Financial Report for the period ending on 31.12.2019

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1/ GENERAL INFORMATION ABOUT SIRMA GROUP HOLDING JSC

"Sirma Group Holding" JSC is a holding company is registered on 25.04.2008 with the Registry Agency with UIC 200101236.

Seat and registered office:

BULGARIA, Sofia (capital), Sofia municipality, city. Sofia, 1784, Mladost area, bul. Tsarigradsko Shosse, No 135.

The object of the company is:

ACQUISITIONS, MANAGEMENT, EVALUATION AND SALE OF PARTICIPATION IN BULGARIAN AND FOREIGN COMPANIES, ACQUISITION, EVALUATION

AND SALE OF PATENTS, CESSION OF LICENSES TO USE PATENTS TO COMPANIES IN WHICH THE COMPANY HOLDS, FINANCE COMPANIES IN WHICH THE COMPANY PARTICIPATES, ORGANIZE ACCOUNTING AND COMPILING FINANCIAL STATEMENTS UNDER THE LAW OF ACCOUNTING. COMPANY MAY PERFORM INDEPENDENT BUSINESS ACTIVITY THAT IS NOT PROHIBITED BY LAW.

The share capital of the company amounts to

BGN 59 360 518, divided into 59 360 518 dematerialized shares with nominal value of BGN1.

The capital of the Company is amended as follows:

Date Size of capital (BGN)

30.10.2015	59 360 518
23.10.2014	49 837 156
22.10.2010	73 340 818
15.10.2008	77 252 478
25.4.2008	50 000

The company's capital is paid 100%.

Non-monetary contributions - description:

1. Software representing 29 (twenty nine) software modules

Value: BGN 61 555 838

2. 81 960 number of ordinary registered shares of "Sirma Group" JSC, the company registered in the Commercial Register to the Registry Agency with UIC 040529004.

Value: BGN 11 734 980

3. Real Estate - Floor 3 of an office building "IT - Center Office Express" in Sofia, bul. "Tsarigradsko Shosse " N 135 with an area 796, 50 square meters, pursuant to Deed of buying and selling real estate N 126, Volume I, reg. N 4551, case N 116 from 23.04.200. and 5 floor of an office building "IT - center office Express" in Sofia bul. "Tsarigradsko Shosse " N 135 with area 281.81 square meters, according to Deed of sale of real estate N 86, Volume 4, Reg. N 10237, Case N 592 of 23.12.2004

Value: BGN 3 911 660

Sirma Group Holding is a public company under the Public Offering of Securities Act.



1.1 Distribution of share capital

As of 31.12.2018 the distribution of the share capital of Sirma Group Holding is as follows:

	31.12.2018 BGN '000	31.12.2017 BGN '000
Share capital	59 361	59 361
Number of shares (par value of BGN 1.00)	59 360 518	59 360 518
Total number of registered shareholders	1041	984
Including legal entities	48	56
individuals	993	928
Number of shares held by legal entities	10 747 462	10 053 825
% Of participation of entities	18,11%	16,94%
Number of shares held by individuals	48 613 056	49 306 693
% Participation of individuals	81,89%	83,06%

Share capital allocation, including deduction of own shares:

Shareholders	Number of shares at 31.12.2018	Number of shares at 31.12.2017	Nominal VALUE (BGN)	Value (BGN)	% Shareholding	% shareholding with deducted repurchased own shares
Atanas Kostadinov Kiryakov	2 887 524	2 859 965	1	2 887 524	4,86%	4,90%
Veselin Kirov Antchev	4 700 786	4 700 786	1	4 700 786	7,92%	7,98%
Tsvetan Borisov Alexiev	4 865 753	4 851 376	1	4 865 753	8,20%	8,26%
Chavdar Velizarov Dimitrov	4 750 786	4 750 786	1	4 750 786	8,00%	8,07%
Yavor Liudmilov Djonev	1 392 746	1 404 560	1	1 392 746	2,35%	2,37%
Georgi Parvanov Marinov	5 269 748	5 257 402	1	5 269 748	8,88%	8,95%
Krasimir Nevelinov Bozhkov	2 596 821	2 965 686	1	2 596 821	4,37%	4,41%
Ognyan Plamenov Chernokozhev	3 741 620	3 731 620	1	3 741 620	6,30%	6,35%
Vladimir Ivanov Alexiev	2 177 583	2 177 583	1	2 177 583	3,67%	3,70%
Rosen Vasilev Varbanov	2 156 687	2 156 687	1	2 156 687	3,63%	3,66%
Peter Nikolaev Konyarov	1 271 910	1 289 307	1	1 271 910	2,14%	2,16%
Emiliana Ilieva Ilieva	2 343 985	2 251 925	1	2 343 985	3,95%	3,98%
Elena Yordanova Kozuharova	948 250	2 140 827	1	948 250	1,60%	1,61%
Ivo Petrov Petrov	835 800	755 750	1	835 800	1,41%	1,42%
Stanislav Ivanov Dimitrov	649 868	649 868	1	649 868	1,09%	1,10%
Expat Bulgaria SOFIX UCITS ETF	977 907	881 407	1	977 907	1,65%	1,66%
Foundation for Educational Transformation	1 301 855	669 566	1	1 301 855	2,19%	2,21%
"NN Universal Pension Fund"	2 434 539	2 439 539	1	2 434 539	4,10%	4,13%
UPF "Doverie" JSC	802 126	802 126	1	802 126	1,35%	1,36%
UPF "DSK Rodina"	747 036	747 036	1	747 036	1,26%	1,27%
UPF "Pension Insurance Institute"	664 190	589 277	1	664 190	1,12%	1,13%
"Mandjukov" Ltd.	960 000	960 000	1	960 000	1,62%	1,63%
Other	10 882 998	10 327 439	1	10 882 998	18,33%	18,48%
Total	59 360 518	59 360 518		59 360 518	100%	100%

As of 31.12.2018 "Sirma Group Holding" JSC posses repurchased 474 724 own shares.

Shareholders holding more than 5% of the company's capital are:

Shareholders	Number of shares at 31.12.2018	% Shareholding	% shareholding with deducted repurchased own shares
Veselin Antchev Kirov	4 700 786	7,92%	7,98%
Tsvetan Borisov Alexiev	4 865 753	8,20%	8,26%
Chavdar Velizarov Dimitrov	4 750 786	8,00%	8,07%
Georgi Parvanov Marinov	5 269 748	8,88%	8,95%
Ognyan Plamenov Chernokozhev	3 741 620	6,30%	6,35%



Shareholders	Number of shares at 31.12.2017	% Shareholding	% shareholding with deducted repurchased own shares
Veselin Antchev Kirov	4 700 786	7,92%	7,98%
Tsvetan Borisov Alexiev	4 851 376	8,17%	8,24%
Chavdar Velizarov Dimitrov	4 750 786	8,00%	8,07%
Georgi Parvanov Marinov	5 257 402	8,86%	8,93%
Ognvan Plamenov Chernokozhev	3 731 620	6.29%	6.34%

1.2 Management authorities

Sirma Group Holding has a one-tier management system - Board of Directors.

The Board of Directors as of 31.12.2018 includes the following members:

Chavdar Velizarov Dimitrov
Tsvetan Borisov Alexiev
Atanas Kostadinov Kiryakov
Georgi Parvanov Marinov
Tsvetomir Angelov Doskov
Sasha Konstantinova Bezuhanova - independent member
Petar Borisov Statev - independent member
Yordan Stoyanov Nedev - independent member

Method of determining the mandate of the Board of Directors: 2 years from the date of entry.

The mandate of the present Board of Directors is until 27.07.2019.

CEO of Sirma Group Holding is Tsvetan Borisov Alexiev.

Investor's Relationship Director is Stanislav Borisov Tanushev

The following committees have been established to the Board of Directors:

Committee on investments and risk Remuneration Committee Committee for disclosure of information

Audit Committee

The participation of members of the Board of Directors in the capital of the Company is as follows:

Shareholders	Number of shares at 31.12.2018	Number of shares at 31.12.2017	Nominal VALUE (BGN)	Value (BGN)	% Shareholding	% shareholding with deducted repurchased own shares
Atanas Kostadinov Kiryakov	2 887 524	2 859 965	1	2 887 524	4,86%	4,90%
Georgi Parvanov Marinov	5 269 748	5 257 402	1	5 269 748	8,88%	8,95%
Tsvetan Borisov Alexiev	4 865 753	4 851 376	1	4 865 753	8,20%	8,26%
Chavdar Velizarov Dimitrov	4 750 786	4 750 786	1	4 750 786	8,00%	8,07%
Petar Borisov Statev	10 100	10 100	1	10 100	0,02%	0,02%
Yordan Stoyanov Nedev	3 433	3 433	1	3 433	0,01%	0,01%
Total	17 787 344	17 733 062		17 787 344	29,96%	30,21%

During the 2018:

- the member of the Board of Directors Atanas Kostadinov Kiryakov acquired 27 559 shares of Sirma Group Holding JSC;
- the member of the Board of Directors Georgi Parvanov Marinov acquired 12 346 shares of Sirma Group Holding JSC;
- the member of the Board of Directors Tsvetan Borisov Alexiev acquired 14 337 shares of Sirma Group Holding JSC;



NOTES TO THE ANNUAL FINANCIAL STATEMENTS FOR 2018

Pursuant to Article 25, paragraph 5 of the Articles of Association of the Company, each member of the Board of Directors has received a permanent bruto remuneration:

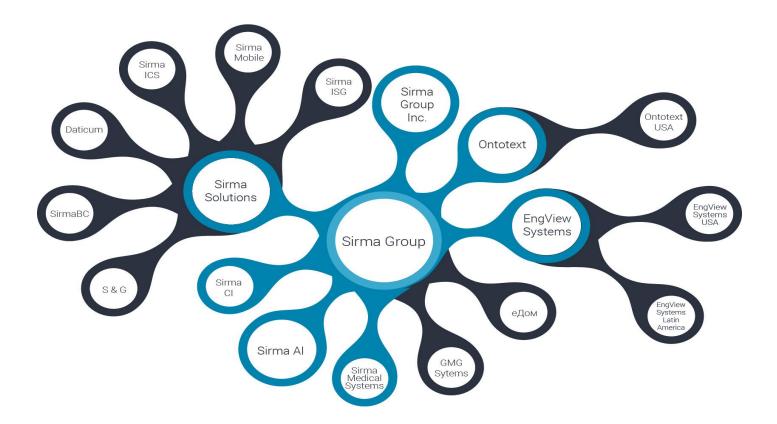
Name	Company	Period: 01.01.2018 - 31.12.2018 (BGN)
Tsvetan Borisov Alexiev	SIRMA GROUP HOLDING JSC	139 500
Chavdar Velizarov Dimitrov	SIRMA GROUP HOLDING JSC	55 689
Tsvetomir Angelov Doskov	SIRMA GROUP HOLDING JSC	18 300
Atanas Kostadinov Kiryakov	SIRMA GROUP HOLDING JSC	18 300
Georgi Parvanov Marinov	SIRMA GROUP HOLDING JSC	19 800
Sasha Konstantinova Bezuhanova	SIRMA GROUP HOLDING JSC	18 000
Yordan Stoyanov Nedev	SIRMA GROUP HOLDING JSC	72 480
Petar Borisov Statev	SIRMA GROUP HOLDING JSC	18 300
Total		360 369

The GMS of "Sirma Group Holding" JSC has selected registered auditor Teodora Ivanova Tsvetanova, diploma № 0771 from 2012 for the auditor of the Company for 2018. The remuneration of the registered auditor for 2018 amounts to BGN 6 000.

1.3 Structure of the group and scope of activity

The structure of the Group includes "Sirma Group Holding" JSC as a parent company and the following companies:

- On 26.10. 2018, a new subsidiary of "Sirma Group Holding" JSC was established "Sirma CI"
- As of 30.11.2018 the subsidiary company "Sirma Enterprise Systems" has changed its name to "Sirma Al"





Subsidiaries of "Sirma Group Holding" JSC

Company	Value of the investment at 31.12.2018 (in BGN'000)	Percentage of capital at 31.12.2018	Percentage of capital with adjusted repurchased own shares at 31.12.2018	Value of the investment at 30.09.2018 (in BGN'000)	Percentage of capital at 30.09.2018	Percentage of capital with adjusted repurchased own shares at 30.09.2018	Changes (in BGN'000)
Sirma Solutions	39 311	77,71%	82,43%	36 260	75,61%	80,62%	3051
Sirma Al	7 035	100,00%	100,00%	6 895	88,71%	90,13%	140
Sirma Medical Systems	66	66,00%	66,00%	66	66,00%	66,00%	0
Sirma Group Inc.	3 471	76,16%	76,16%	3 471	76,16%	76,16%	0
Sirma CI	106	80,00%	80,00%	0	0	0,00%	106
Ontotext	17 865	87,65%	90,44%	9 650	58,51%	58,51%	8215
Engview Systems	50	72,90%	72,90%	50	72,90%	72,90%	0
Total	67 904			56 392			11512

Associated companies and joint ventures of "Sirma Group Holding" JSC

Company	Value of the investment at 31.12.2018 (BGN'000)	Percentage of capital at 31.12.2018	Value of the investment at 31.12.2017 (BGN'000)	Percentage of capital at 31.12.2017	Changes (BGN'000)
GMG Systems (IN LIQUIDATION)	150	19,93%	214	19,93%	(64)
E-DOM MANAGEMENT	7	35,00%	7	35,00%	0
Total	157		221		(64)

In 2018, GMG Systems was depreciated at the amount of BGN 64 thousand, which is entered under "Financial expenses" in the Statement of Comprehensive Income.

1.4 Events and business news in 2018

The following major events took place in 2018:

17.12.2018

Sirma Business Consulting with a new contract in the Caribbean Basin.

23.11.2018

Fujitsu purchased Graph DB licenses for its activity from the daughter company of Sirma Group Holding JSC - Ontotext JSC.

22.11.2018

Sirma Group joins the charity initiative of the Bulgarian Red Cross "Colour in Life".

19.11.2018

The product of Sirma Medical Systems JSC for stuttering defects MPI II is presented at the Annual Congress of the American Hearing and Speech Association.

12.11.2018

Sirma acknowledges a 40% increase of its US-based business for the first nine months of the year.

29.10.2018

Ontotext JSC won new European funding for 1.7 million euro from the program Horizon 2020.

09.10.2018

Ontotext JSC launched a new version of its leading product Graph DB 8.7

18.09.2018

Sirma Business Consulting launches online the first Bulgarian credit chat-bot - EVA (Electronic Virtual Assistant) supporting the clients of the PostBank.



17.09.2018

Ontotext takes part for the third time in the Global Datathon 2.0. Ontotex is presenting their project "Automated Industry Classification for Open Data Company Graph".

10.09.2018

The daughter company of Sirma Group – S&G Technology Services supported the finalization of a project for a new, fully integrated mobile application of UBB, part of the KBC Group.

16 07 2018

Sirma Group Holding is ranked among the ten leading IT companies in the "Top 100 IT Companies in Bulgaria" ranking.

29.06.2018

Ontotext launched their new upgraded version of their semantic graph base – GraphDB 8.6. You may read the full text of this news post <u>here</u>.

18.06.2018

Ontotext won funding for applying AI for linked data to the amount of BGN 779 605 under EU Operational Programme "Innovation and Competitiveness". The project is called "Intelligent linked data for companies from various sources". You may read the full text of this news post https://example.com/here/.

12.06.2018

The Financial Supervision Commission approved the Prospectus of Sirma Group Holding for increase of capital through issue of new shares. You may read the whole news post here.

18.05.2018

Sirma Medical System launched a new product – the application MPI-2 for support of people with stuttering problems. You may read the whole news post <u>here</u>.

29.03.2018

The shares of Sirma Group Holding are included in the leading "Premium" segment of the Bulgarian Stock Exchange - Sofia. This was made clear after a meeting of 28.03.2018 of the Board of Directors of the Bulgarian Stock Exchange, where the respective decision was made. So far the shares of Sirma have traded in the "Standard" segment. The decision comes into force on 03.04.2018.

29.03.2018

The Bulgarian semantic software company Ontotext JSC, part of Sirma Group Holding, officially introduced the new version 8.5 of its GraphDB semantic graph base. The release includes a number of improvements and is the next step in the company's policy of creating an even easier to use and reliable graph data base, which is much more efficient and faster to load, process, and refresh large volumes of data.

20.03.2018

From March 20, 2018, Sirma installed on its site a prototype of a chatbot to facilitate site visitors. The chatbot is called Sam. It is specifically designed to make it easy for a site visitor to quickly and easily receive the most frequently searched corporate information.

19.03.2018

The Bulgarian rating system for higher education institutions received important international recognition in the new Global Ratings and Geopolitics of Higher Education book. Sirma Solutions JSC is among the founders of the project. In the book, the Bulgarian rating of universities is described as extremely "successful", "innovative" and the "first" of the so-called "third wave of national ratings" in the world.

08.03.2018

S & G Technology Services Ltd, a Sirma Group company, has successfully completed work on a challenging Temenos - Front Office Open Banking prototype project for pre-validation of the technology. Excellent teamwork, together with the accumulated technological expertise in banking software, system integration, user design and compliance services helped the successful implementation of a fully-fledged prototype, covering the most important applications of the revised European Payment Services Directive - PSD2.



26.02.2018

Ontotext AD announced a partnership with one of the leading information databases in the field of pharma and biotechnology - the Canadian DrugBank. This will add a great deal of opportunity to commercial and academic research in the field of pharmacy and healthcare and will increase the possibility of detecting and re-using information on drug substances, which is used in the treatment of various diseases.

01.02.2018

Sirma presented its Development and Growth Strategy for the period 2018 - 2022. The strategy of Sirma Group Holding AD was updated in the first half of 2017, after discussion with shareholders and stakeholders. Our ambitious goal is to reach EUR 120 million in sales revenue in 2022. The information is also available in English.

24.01.2018

On 24 January 2018 the Atanas Burov Foundation presented its annual awards. The ceremony was held at the Grand Hotel Sofia and the winners of the prize for 2017 were Petya Dimitrova and Tsvetan Alexiev. The Executive Director of Sirma Group Holding JSC - Tsvetan Alexiev is the winner of the award in the section "Industrial Management". Established in 1992, the Atanas Burov Foundation has been awarded annually with a prize for bank management - since 1994, and for industrial management - since 2000.

13.01.2018

More than thirty children took part in the first climbing competition titled "With Diabetes to the Top". The competition is part of the charity event organized by Sirma Medical Systems, the developer of one of the most popular diabetes applications in the world - Diabetes: M.

2/ SUMMARY OF THE SIGNIFICANT ACCOUNTING POLICIES OF THE COMPANY

The individual annual financial statements of Sirma Group Holding JSC have been prepared in accordance with all International Financial Reporting Standards (IFRS), which comprise Financial Reporting Standards and the International Financial Reporting Interpretations Committee (IFRIC) interpretations, approved by the International Accounting Standards Board (IASB), as well as the International Accounting Standards (IAS) and the Standing Interpretations Committee (SIC) interpretations, approved by the International Accounting Standards Committee (IASC), which are effectively in force on 1 January 2018 and have been accepted by the Commission of the European Union

For the current financial year the Company has adopted all new and/or revised standards and interpretations, issued by the International Accounting Standards Board (IASB) and respectively, by the International Financial Reporting Interpretations Committee (IFRIC), which have been relevant to its activities.

The adoption of these standards and/or interpretations, effective for annual periods beginning on 1 January 2018, has caused changes in the accounting policies.

For more information, please see – Appendix №2.



3/ REVENUES

The revenues of the Company are:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Sales revenue	5 558	4 569	989	21,65%
Interest income	269	248	21	8,47%
Revenue from participations	-	859	(859)	-100,00%
Income from financing	54	54	-	0,00%
Other Income	3	5	(2)	-40,00%
Total	5 884	5 735	149	2,60%

In 2018 the revenues of Sirma Group Holding increased by BGN 149 thousand or by 2,60% compared to 2017. The main share in the increase of the revenues has the sales revenues, which increased by BGN 989 thousand or by 21,65% compared to 2017.

Revenue during 2018 includes revenue from services - accounting and administrative-legal, and revenue from cloud services, income from licenses and rental income from investment property and interest on lending to related parties.

Revenues from financing are in connection with the Grant Contract BI-02-16 / 02.02.2012 under Operational Program "Development of the Competitiveness of the Bulgarian Economy" 2007-2013. Funding is for buying fixed assets and incubating new startups.

Revenues by countries:

	31.12.2018 BGN '000	Relative share	31.12.2017 BGN '000	Relative share
USA	4	0,07%	147	3,22%
Germany	255	4,59%	-	0,00%
Bulgaria	5 299	95,34%	4 422	96,78%
Total	5 558	·	4 569	

Revenues generated by the biggest clients of the company:

	31.12.2018 BGN '000	Relative share	Relationship	31.12.2018 BGN '000	Relative share	Relationship
Client 1	4 099	73,75%	Related party	1 681	36,79%	Related party
Client 2	255	4,59%	Unrelated party	1 143	25,02%	Related party
Client 3	170	3,06%	Related party	873	19,11%	Related party

Sales revenue includes:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Rents of investment properties	301	317	(16)	-5,05%
Consulting services	-	133	(133)	-100,00%
Administrative service	872	863	9	1,04%
Software Services	-	1 044	(1 044)	-100,00%
Sales of licenses	906	625	281	44,96%
Cloud Services	3 316	1 510	1 806	119,60%
Others	163	77	86	111,69%
Total	5 558	4 569	989	21,65%



EXPENSES

In 2018 the expenses of "Sirma Group Holding" JSC increased by BGN 216 thousand or by 8,42% as compared to 2017. The main share in the expenses is the expenses for external services, increased by BGN 764 thousand or by 19,79% compared to 2017.

4/ STAFF EXPENSES

Staff expenses include:

	31.12.2018	31.12.2017	Change	Change
	BGN '000	BGN '000	(BGN '000)	(%)
Employment remuneration	1 220	1 357	(137)	-10,1%
Social security contributions	124	129	(5)	-3,88%
Total	1 344	1 486	(142)	-9,56%

During the reporting period staff expenses decreased by 9,56%, mainly due to the decrease in the number of staff and the suspension of the remuneration of the members of the Remuneration Committee and the Committee on Investment and Risk

5/ MATERIAL EXPENSES

The material expenses includes:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN 000)	Change (%)
Electricity	6	5	1	20,00%
Heating	8	2	6	300,00%
Office supplies	4	4	-	0,00%
Materials for office repair and maintenance	15	2	13	650,00%
Computer components	4	20	(16)	-80,00%
Inventory	17	4	13	325,00%
Advertising materials	1	7	(6)	-85,71%
Hygienic materials	9	7	2	28,57%
Others	27	25	2	8,00%
Total	91	76	15	19,74%



6/ EXPENSES FOR EXTERNAL SERVICES

Expenses for external services includes:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Mobile phones	9	11	(2)	-18,18%
Fixed phones	-	1	(1)	-100,00%
Internet	18	18	-	0,00%
Civil contracts	5	1	4	400,00%
Consulting services	331	299	32	10,70%
Audit	11	16	(5)	-31,25%
Security	11	10	1	10,00%
Cleaning	10	18	(8)	-44,44%
Maintenance and repair of automobiles	8	15	(7)	-46,67%
Maintenance and repair of the office	32	16	16	100,00%
Parking	5	4	1	25,00%
Insurance	10	8	2	25,00%
Subscriptions	17	37	(20)	-54,05%
Advertising	73	130	(57)	-43,85%
Seminars and training	20	7	13	185,71%
Software services	3 941	3 202	739	23,08%
Rental of software license	82	20	62	310,00%
Fees and commissions	32	31	1	3,23%
Others	9	16	(7)	-43,75%
Total	4 624	3 860	764	19,79%

The largest share in the increase of the expenses for external services had the increase in software services expenses - the bulk of which is for the development of Sirma Cloud software asset.

7/ DEPRECIATION AND AMORTIZATION EXPENSES

	31.12.2018	31.12.2017	Change	Change
	BGN '000	BGN '000	(BGN '000)	(%)
Depreciation and amortization	242	324	(82)	-25,31%

8/ CAPITALIZED EXPENSES

	31.12.2018	31.12.2017	Change	Change
	BGN '000	BGN '000	(BGN '000)	(%)
Canitalized own expenses	3 761	3 361	400	11 00%

9/ INTEREST EXPENSES

Interest expenses on deposits of related companies include:

	31.12.2018	31.12.2017	Change	Change
	BGN '000	BGN '000	(BGN '000)	(%)
Interest expenses	6	7	(1)	-14 29%



10/ CARRYING AMOUNT OF ASSETS SOLD

	31.12.2018	31.12.2017	Change	Change
	BGN '000	BGN '000	(BGN '000)	(%)
Carrying amount of assets sold	81	-	81	n/a

11/ OTHER OPERATING EXPENSES

Other operating expenses include:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Entertainment expenses	13	14	(1)	-7%
Social costs	13	14	(1)	-7%
Local taxes and fees	69	127	(58)	-46%
Business trips	-	4	(4)	-100%
Donations	3	7	(4)	-57%
Others	57	8	49	613%
Total	155	174	(19)	-10,92%

FINANCIAL INCOME / COSTS (NET)

In 2018, financial income / costs (net) of "Sirma Group Holding" JSC increased by BGN 73 thousand to 2017. The main share in the increase is the financial expenses, increased by BGN 146 thousand or 91,25% against the previous period.

12/ FINANCIAL COSTS

Financial costs include:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Interest expense on loans received from unrelated parties	211	107	104	97,20%
Expenses on foreign exchange operations	3	34	(31)	-91,18%
Other financial costs	92	19	73	384,21%
Total	306	160	146	91,25%

13/ FINANCIAL INCOME

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Interest income from unrelated parties	10	10	-	0,00%
Income from foreign exchange operations	74	1	73	7300,00%
Total	84	11	73	663.64%



14/ COMPREHENSIVE INCOME

	31.12.2018	31.12.2017	Change	Change
	BGN '000	BGN '000	(BGN '000)	(%)
Actuarial gains and losses	-4	-	4	n/a

15/ PROPERTY, PLANT AND EQUIPMENT

31.12.2018	PROPERTY, PLANT AND EQUIPMENT	OTHER	WORK IN PROGRESS	TOTAL
Cost				
Cost at 1 st of January	855	24		879
Additions	105	22	406	127
Cost at 31 st of December	960	46	406	1 006
Depreciation				
Depreciation at 1 st of January	449	3		452
Depreciation charge for the period	115	5		120
Depreciation at 31 st of December	564	8		572
Net Book Value at 31 st of December	396	38	406	840
Net Book Value at 1 st of January	406	21		427

31.12.2017	PROPERTY, PLANT AND EQUIPMENT	OTHER	TOTAL
Cost			
Cost at 1 st of January	828	9	837
Additions	27	15	42
Cost at 31 st of December	855	24	879
Depreciation			
Depreciation at 1 st of January	285	2	287
Depreciation charge for the year	164	1	165
Depreciation at 31 st of December	449	3	452
Net Book Value at 31 st of December	406	21	427
Net Book Value at 1 st of January	543	7	550



16/ INTANGIBLE ASSETS

31.12.2018	Rights to the software modules	Software products	Other Intangible Assets	Work in progress(Intangible assets in development)	Total
Cost					
Cost at 1 st of January	-	57	4	5 103	5 164
Additions	540	-	-	3 761	4 301
Cost at 31 st of December	540	57	4	8 864	9 465
Amortization					
Amortization at 1st of January	-	27	1	-	28
Amortization charge for the year	31	12	-	-	43
Amortization at 31 st of December	31	39	1	-	71
Net Book Value at 31 st of December	509	18	3	8 864	9 394
Net Book Value at 1 st of January	-	30	3	5 103	5 136

31.12.2017	Rights to the software modules	Software products	Other Intangible Assets	Work in progress(Intangible assets in development)	Total
Cost					
Cost at 1 st of January	1 904	57	4		1 965
Additions				5 103	5 103
Disposals	1 904				1 904
Cost at 31 st of December	-	57	4	5 103	5 164
Amortization					
Amortization at 1 st of January	163	14	1		178
Amortization charge for the year		13			13
Amortization on disposals	163				163
Amortization at 31 st of December	-	27	1	-	28
Net Book Value at 31 st of December	-	30	3	5 103	5 136
Net Book Value at 1 st of January	1 741	43	3	-	1 787

17/ INVESTMENT PROPERTY

	31.12.2018 BGN '000	31.12.2017 BGN '000
Cost at 1 st of January	7 750	6 222
Additions	-	1 528
Cost at 31 of December	7 750	7 750
Depreciation		
Depreciation at 1 st of January	1 068	921
Depreciation charge for the year	78	147
Depreciation at / 31 of December	1 146	1 068
Net Book Value at 31 of December	6 604	6 682
Net Book Value at 1 st of January	6 682	5 301



Investment properties, reported at acquisition cost, are specially distinct parts of self-contained buildings intended for long-term letting of subsidiaries and third parties.

The rental income of investment properties for 2018 is BGN 301 thousand (2017 - BGN 304 thousand).

The direct operating costs for investment property for 2018 are BGN 147 thousand (2017 - 76 thousand).

The fair value of the investment property as at 31.12.2018 is BGN 6 626 thousand.

18/ INVESTMENTS IN SUBSIDIARIES AND ASSOCIATED COMPANIES

The carrying amount of investments in subsidiaries is as follows:

Company	Value of the investment at 31.12.2018 (BGN'000)	Value of the investment at 31.12.2017 (BGN'000)	Changes In BGN'000
Sirma Solutions	39 311	36 260	3051
Sirma AI	7 035	6 895	140
Sirma Medical Systems	66	66	0
Sirma Group Inc.	3 471	3 471	0
Sirma CI	106	0	106
Ontotext	17 865	9 650	8215
Engview Systems	50	50	0
Total	67 904	56 392	11 512

The carrying amount of investments in associates (associates and joint ventures) is as follows:

Company	Value of the investment at 31.12.2018 (BGN'000)	Value of the investment at 31.12.2017 (BGN'000)	Changes In BGN'000
GMG Systems (IN LIQUIDATION)	150	214	(64)
E-DOM MANAGEMENT	7	7	0
Total	157	221	(64)

[&]quot;Sirma Group Holding" JSC has direct or indirect control over the aforementioned companies.

The core business of Group companies is concentrated in the IT sector.

The parent company and the subsidiaries operate on the territory of Bulgaria and the United States.

The shares of the subsidiaries are not traded on a regulated market.

In pursuance of the strategy of Sirma Group Holding JSC for the reduction of the non-controlling interest in the subsidiaries during the reporting period were acquired: 305 110 shares from the increase of the capital of Sirma Solutions for BGN 3 051 thousand; 4 187 087 shares of Ontotext through purchase by a minority shareholder for BGN 8 215 thousand; 13 902 Class A Shares and 2 024 ordinary shares of Sirma AI capital for BGN 140 thousand.

A new company - Sirma CI - was set up with a capital of BGN 133 000, in which Sirma Group Holding JSC acquired 106 000 shares, which was not fully paid.



Changes in the investment in subsidiaries are presented below:

	31.12.2018	31.12.2017
Cost of acquisition	BGN '000	BGN '000
Cost at 1 st of January	56 392	55 414
Acquired through increase of the share capital	11 512	978
Cost at 31 of December	67 904	56 392
Net Book Value at 31 of December	67 904	56 392
Net Book Value at 1 st of January	56 392	55 414

Investments are measured at historical cost and tested for impairment.

19/ INCOME TAX EXPENSE / REVENUE FROM INCOME TAXES

Conversion of accounting to tax result:

Accounting result as at 31.12.2018 (in thousands of BGN)	2881
Increases (in thousands of BGN)	407
Reductions (in thousands of BGN)	(353)
Tax result as at 31.12.2018 (in thousands of BGN)	2935
Current tax (10%)	293
Temporary differences	(9)
Income tax expense	284

20/ OPERATING LEASE

The Company has provided for rent fixed assets to related parties with carrying amount as at 31.12.2018 amounting to BGN 5 172 thousand (31.12.2017 - BGN 5 234 thousand).

21/ FINANCE LEASE

As at 31.12.2018, assets with carrying amount of BGN 208 thousand were acquired under finance lease contracts (31.12.2017: BGN 210 thousand).

22/ INVENTORIES AND OTHER DATA

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Other material assets	0	29	(29)	100%
Total	0	29	(29)	100%

As at 31.12.2018, there are established burdens on the tangible fixed assets of the company in relation to borrowings as follows:

• Mortgages - BGN 7 664 thousand (31.12.2017: BGN 7 664 thousand)



23/ RECEIVABLES FROM RELATED PARTIES

Receivables from related parties include:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Receivables from subsidiaries	5 064	7 111	(2 047)	-28,79%
Receivables from entities under indirect common control	1 440	1 364	76	5,57%
Total	6 504	8 475	(1 971)	-23,26%

Trade receivables from related parties by types are as follow:

	31.12.2018	31.12.2017	Change	Change
	BGN '000	BGN '000	(BGN '000)	(%)
Receivables on sales of products, goods, materials and	895	1 552	(657)	-42,3%

Typically, the company negotiates with its subsidiaries a payment period for receivables from sales of services up to 180 days. Because of the company's high collectivity, the expected loss pattern has an insignificant effect.

The Company has set a 180-day credit period for which it does not charge interest rates on the related parties. The delay after this period was accepted by the company as an indicator of impairment.

The management assesses on an individual basis the collection by analyzing the specific receivables and the circumstances of the delay for accruing impairment. The management estimates expected future losses.

The ageing of trade receivables from related parties is as follows:

	31.12.2018	31.12.2017	Change	Change
	BGN '000	BGN '000	(BGN '000)	(%)
up to 30 days	370	439	(69)	-15,72%
from 31 to 90 days	10	159	(149)	-93,71%
from 91 to 180 days	515	273	242	88,64%
from 181 to 240 days	-	1	(1)	-100,00%
Total	895	872	23	2,64%

The ageing of past due unimpaired trade receivables from related parties is as follows:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
from 180 days to 365 days	-	439	(439)	-100.00%
from 1 year to 2 years	-	223	(223)	-100.00%
over 2 years	-	18	(18)	-100.00%
Total	-	680	(680)	-100.00%

IFRS 9 requires the Company to account for the expected credit losses on all its trade and other receivables.

For the reporting period, depreciation expenses amounting to BGN 21 thousand have been reported. They are included in line "Other expenses" in the Statement of Comprehensive Income.



Granted loans to related companies by type of ownership:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Receivables from entities under indirect common control	1 292	1 108	184	16,61%
Subsidiaries	4 159	4 386	(227)	-5,18%
Total	5 451	5 494	(43)	-0,78%

Dividends receivables from related companies by type of ownership:

	31.12.2018	31.12.2017	Change	Change
	BGN '000	BGN '000	(BGN '000)	(%)
Subsidiaries	66	1402	(1336)	-95.29%

As of 31.12.2018, amounts to accountable persons amounting to BGN 371 thousand (BGN 2017 - 0 thousand) were provided, including members of the board of directors of Sirma Group Holding JSC:

- Atanas Kostadinov Kiriakov BGN 57 thousand (2017 BGN 0 thousand)
- Tsvetan Borisov Aleksiev BGN 14 thousand (2017 BGN 0 thousand)
- Georgi Parvanov Marinov BGN 12 thousand (2017 BGN 0 thousand)

The conditions under which loans to related parties are granted are as follows:

Currency BGN	Amount agreed BGN '000	Maturity	Interest rate %	31.12.2018 BGN '000	31.12.2017 BGN '000
Receivables from entities under indirect common control					
Sirma ISG	257	31.12.2018	5,00%	257	250
Sirma Media	18	31.12.2019	6,50%	18	18
Pirina Technologies	767	31.12.2019	6,50%	767	591
Flash Media	250	31.12.2019	3,00%	250	250
Sirma ICS					
Subsidiaries	801	31.12.2018	3,75%	-	800
Sirma Solutions	3 583	31.12.2019	5%, 3,5%	3 583	3 164
Sirma Enterprise Systems	516	31.12.2019	5,00%	516	421
Sirma Medical Systems	60	31.12.2019	2,50%	60	-

All related party transactions are under market conditions and receivables are not secured.

24/ TRADE RECEIVABLE

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Receivables from customers	353	1 512	(1 159)	-76,65%
Advances provided	131	3	128	4266,67%
Total	484	1 515	(1 031)	-68,05%



The age structure of non-performing (regular) trade receivables is as follows:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Up to 30 days	467	1 490	(1 023)	-68,66%
From 31 to 90 days	3	1	2	200,00%
From 91 до 180 days	14	-	14	n/a
Total	484	1 491	(1 007)	-67,54%

The age structure of past due unrecognized trade receivables is as follows:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
from 181 days to 365 days	-	1	(1)	-100.00%
over 1 year	-	23	(23)	-100.00%
Total	-	24	(24)	-100.00%

25/ TAX RECEIVABLES,OTHER RECEIVABLES AND PREPAID EXPENSES

Tax receivables includes:

	31.12.2018	31.12.2017	Change	Change
	BGN '000	BGN '000	(BGN '000)	(%)
VAT	69	-	69	n/a

Other receivables and prepaid expenses includes:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Prepaid expenses	7	7	-	0,00%
Other receivables	353	336	17	5,06%
Total	360	343	17	4.96%

Prepaid expenses includes:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Insurance	2	1	1	100%
Subscriptions	5	6	(1)	-17%
Total	7	7	-	0%

26/ CASH AND CASH EQUIVALENTS

Cash and cash equivalents includes:

	31.12.2018	31.12.2017	Change	Change
	BGN '000	BGN '000	(BGN '000)	(%)
Cash at bank	1 179	587	592	100,85%
Cash in case	35	17	18	105,88%
Total	1 214	604	610	100,99%

Cash in case is in BGN.



27/ EQUITY

In 2018, Equity increased by BGN 2 574 thousand compared to the previous reporting period.

MAIN SHARE CAPITAL

As of 31.12.2018, the share capital of "Sirma Group Holding" JSC amounted to BGN 59 361 thousand, divided into

59 360 518 dematerialized registered shares with nominal value of BGN 1

Shares are ordinary, dematerialized, with the right to receive dividends and liquidation share.

Issued and fully paid ordinary at	Number of shares	Share capital, net of treasury shares BGN '000
Balance at January 1, 2017	59 360 518	59 099
Balance at December 31, 2017	59 360 518	58 886
Balance at January 1, 2018	59 360 518	58 886
Balance at December 31, 2018	59 360 518	58 886

For the reporting period share capital remained unchanged from the previous period. In execution of the decisions of the regular General Meeting of Shareholders Sirma Group Holding JSC purchased 474 724 own shares. The board of directors believes in the development of the Sirma Group Holding JSC and the increase of the market value of the shares in the future and therefore decided to purchase these shares at a relatively low price.

The company's reserves are summarized in the table below:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Statutory reserves	592	311	281	90,35%
Emission premiums	5 462	5 462	-	0,00%
Total	6 054	5 773	281	4,87%

The movement of statutory reserves is as follows:

	31.12.2018	31.12.2017	Change	Change
	BGN '000	BGN '000	(BGN '000)	(%)
Balance on January 1	311	147	164	112%
Profit distribution	281	164	117	71%
Balance on 31 December	592	311	281	90%

The movement of the Emission premiums is as follows:

	31.12.2018	31.12.2017	Change	Change
	BGN '000	BGN '000	(BGN '000)	(%)
Balance on January 1	5 462	5 483	(21)	-0,38%
Emission premiums	-	(21)	21	-100,00%
Balance on 31 December	5 462	5 462	-	0,00%



The movement of retained earnings is as follows:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Balance on January 1	4 847	2 796	2 051	73,35%
Recalculated balance	4 835	2 796	2 039	72,93%
Distribution of profit for reserves	(281)	(164)	(117)	71,34%
Others	(18)	-	(18)	100,00%
Dividends	-	(594)	594	-100,00%
Current result for the period	2 596	2 809	(213)	-7,58%
Balance on 31 December	7 132	4 847	2 285	47,14%

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Weighted average number of shares	58 886	59 062	(176)	-0,30%
Net profit for the period (BGN '000)	2 596	2 809	(213)	-7,58%
Basic earnings per share (BGN)	0,0441	0,0476	0.00	-7,38%

28/ LONG-TERM AND SHORT-TERM BANK LOANS

Long-term bank loans

Bank and currency	Agreed amount	Maturity	Interest %	31.12.2018	31.12.2017	Change (BGN '000)	Change (%)
	BGN '000			BGN '000	BGN '000	, ,	(,
Unicredit Bulbank AD (euro)	587	8.12.2023	BIP 4.45%; LI 3M EURIBOR	196	244	(48)	-20%
Unicredit Bulbank AD (BGN)	1 782	7.4.2027	3M SOFIBOR; premium 2.5%	1 308	1 506	(198)	-13%
Alianz Bank AD (euro)	241	25.11.2023	6M LIBOR premium 4.75%	95	120	(25)	-21%
Unicredit Bulbank AD (BGN)	9 780	26.7.2022	3M SOFIBOR; premium 1.35%	7 800	0	7800	n/a

Short-term bank loans

Bank and currency	Agreed amount BGN '000	Maturity	Interest %	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Eurobank Bulgaria AD – overdraft (BGN)	2200	31.7.2019	2,50%	2 110	2 194	(84)	-4%
Societe Generale Exppressbank - overdraft (BGN)	2000	31.8.2019	2,50%	1 994	1 994	-	0%
Unicredit Bulbank AD (euro)	587	8.12.2023	3M EURIBOR + 4.45%	49	49	-	0%
Unicredit Bulbank AD (BGN)	1782	7.4.2027	ADI + 2.332% (no less that 2.5%)	198	132	66	50%
Alianz Bank AD (euro)	241	25.11.2023	6M LIBOR premium 4.75%	24	24	-	0%
Unicredit Bulbank AD (BGN)	9780	26.7.2022	ADI + 2.332% (no less that 1.35%)	1 980	-	1 980	n/a



29/ DEFERRED TAX ASSETS AND LIABILITIES

Deferred income taxes as at 31 December relate to the following items in the statement of financial position:

	Temporary difference as at 31.12.2018 (BGN '000)	Deferred tax at 31.12.2018	Temporary difference as at 31.12.2017 (BGN '000)	Deferred tax at 31.12.2017
Property, plant and equipment, incl. Revaluation	816	82	403	40
reserve	010	02	403	40
Unpaid amounts to individuals	-	-	197	20
Total deferred tax liabilities	816	82	600	60
Payables to staff	53	5	39	4
Unpaid amounts to individuals	45	5	-	-
Loss	-	-	53	5
Impaired receivables	21	2	21	2
Impaired ivestment	64	6	-	-
Pension provisions	27	3	6	1
Total deferred tax assets	210	21	119	12
Net deferred income tax liabilities	606	61	481	48



30/ FINANCIAL LEASING

Finance lease liabilities

The finance lease liabilities included in the statement of financial position as at 31 December are under contracts for the acquisition of fixed assets. They are presented net of interest due in the future and are as follows:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Up to one year	46	42	4	9,52%
Over a year	66	114	(48)	-42,11%

Company	Creditor	Currency	Credit amount in currency	Туре	Value at 31.12.2018 (BGN)	Interest rate	Contract end date
Sirma Group Holding JSC	Leasing Finance	Euro	154 082	Leasing	57 172	3M Euribor + 4,75%	30.4.2021

31/ LONG-TERM LIABILITIES TO RELATED PARTIES

Long-term liabilities to related parties include:

	31.12.2018	31.12.2017	Change	Change
	BGN '000	BGN '000	(BGN '000)	(%)
Liabilities to subsidiaries	0	141	-141	-100%

Long-term liabilities to related parties are not secured and are provided under market conditions.

32/ LONG-TERM PROVISIONS

	31.12.2018	31.12.2017	Change	Change
	BGN '000	BGN '000	(BGN '000)	(%)
Accrued retirement benefits Under IAS 19	27	10	(17)	170%

Long-term payables to staff include the present value of the Company's liability to pay benefits to hired personnel at the end of the reporting period at retirement age. According to the Labor Code, each employee is entitled to compensation amounting to two gross salaries on retirement, and if he has worked with the same employer for the last 10 years of his length of service, the compensation is 6 gross salaries at the time of retirement.

Payables to staff at retirement:

Long-term payables to staff include the present value of the Company's liability for the payment of benefits to employees by 31 December 2018 at retirement age. According to the Labor Code, each employee is entitled to compensation amounting to two gross salaries on retirement, and if he has worked with the same employer for the last 10 years of his length of service, the compensation amounts to 6 gross salaries at the time of retirement. For determining these liabilities, the Company has performed an actuarial valuation using the services of a certified actuary Pavel Valeriyev Dimitrov.



On the basis of the report prepared by the actuary, a liability in the statement of financial position as at 31 December 2018 is set at BGN 27 thousand.

In determining the final net liability as at 31 December 2018, the following basic actuarial assumptions were made:

- · Mortality table;
- · Rate of turnover:
- · Likelihood of disability;
- · Acquisition of pension entitlements for length of service and age;
- · Current and future salary levels;
- The discount rate used to calculate the obligation is an effective annual interest rate of 3.0%, which corresponds to a 2.91% annual discount rate.

Sensitivity analysis

Factors based on which a sensitivity analysis will be done are turnover, wage management and a discount factor.

33/ CURRENT TRADE AND OTHER PAYABLES

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Obligations to suppliers	37	41	(4)	-9,76%
Obligations on purchased shares	4 303	-	4 303	н/п
Total	4 340	41	4 299	10 485%

34/ CURRENT LIABILITIES TO RELATED PARTIES

Current liabilities to related parties include:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Liabilities to subsidiaries	540	2 753	(2 213)	-80,39%
Liabilities to companies under common control through key management personnel	27	415	(388)	-93,49%
Total	567	3 168	(2 601)	-82,10%

Current liabilities to related entities by type are as follows:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Service delivery	174	1 476	-1302	-88,21%
Deposits payable	170	279	-109	-39,07%
Capital liabilities	220	1 410	-1190	-84,40%
Dividend obligations	3	3	-	0,00%
Total	567	3 168	(2 601)	-82,10%

35/ TAX OBLIGATIONS



Tax liabilities include:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Taxes on Income of Individuals	30	28	2	7,14%
VAT	-	3	(3)	-100,00%
Taxes under CITA	300	220	80	36,36%
Total	330	251	79	31.47%

36/ PENSION OBLIGATIONS TO THE STAFF

Payables to staff and social security are as follows:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Payables to personnel, including:	113	36	77	214%
Remuneration obligations	96	2	94	4700%
Social security obligations	17	34	(17)	-50%
Provisions for unused compensated leave, including:	53	56	(3)	-5%
Accruals for unused compensated leave	46	50	(4)	-8%
Contributions for unused compensated leave	7	6	1	17%

37/ OTHER CURRENT LIABILITIES

Other current liabilities include:

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)	
Other liabilities	12	12	0	0	

38/ CONDITIONAL OBLIGATIONS AND COMMITMENTS, FINANCING

There are no legal proceedings against the company.

Guarantees provided

The Company is a co-borrower of bank loans and leases and a guarantor of banks of the following companies:

	Maturity	Type of currency	Amount	Debt status
Sirma ISG – overdraft Unicredit Bulbank	28.2.2019	BGN	120000	regular
Sirma Enterprise Systems - overdraft Unicredit Bulbank	28.2.2019	BGN	250000	regular
Sirma Solutions - overdraft Unicredit Bulbank	28.2.2019	EUR	810000	regular
Sirma Solutions - overdraft Unicredit Bulbank	28.2.2019	EUR	700000	regular
Ontotext	31.1.2019	EUR	460000	regular

Financing

As of 31.12.2018 the long-term financing of Sirma Group Holding JSC amounted to BGN 26 thousand (31.12.2017: BGN 81 thousand) and the short-term loans amounted to BGN 55 thousand (31.12.2017: BGN 55 thousand).



39/ CASH FLOWS

Money and cash equivalents at the end of 2018 increased by BGN 610 thousand or by 100,99% compared to the end of 2017.

In the Cash Flow of the Company for the year 2018, the "Receipts from Customers" and "Payments to Suppliers" sections have actual cash flows from transactions in which the company acted as an agent according to IFRS 15. Also, there is a reimbursement under old related party receivables. This is the reason for the large difference between " Cash receipts from customers " from the Cash Flow Statement and "Revenue" from the Company's Comprehensive Income Statement for 2018.

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Operation activity	20.1 000	20.1 000	(2 222)	(**)
Cash receipts from customers	11 471	6 679	4 792	71,75%
Payments to suppliers	(7 798)	(4 662)	(3 136)	67,27%
Payments to employees and social security institutions	(1 192)	(1 448)	256	-17,68%
Cash flows related to interest, commissions, dividends and the like	1 336	-	1 336	n/a
Cash flows from positive and negative exchange rate differences	(2)	-	(2)	n/a
Payments for income tax	(227)	(34)	(193)	567,65%
Other receipts / (payments), net	126	(698)	824	-118,05%
Net cash flow from operating activities	3 714	(163)	3 877	n/a

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Investment activity	-	-		
Payments for acquisition of property, plant and equipment	(386)	(1 570)	1 184	-75,41%
Payments for acquisition of intangible assets	(3 699)	(1 739)	(1 960)	112,71%
Payments for acquisition of subsidiaries	(8 340)	(978)	(7 362)	752,76%
Loans, deposits	(581)	(2 395)	1 814	-75,74%
Payments on loans	801	1 594	(793)	-49,75%
Others	-	(529)	529	-100,00%
Net cash flow from investing activities	(12 205)	(5 617)	(6 588)	117,29%

	31.12.2018 BGN '000	31.12.2017 BGN '000	Change (BGN '000)	Change (%)
Financial activity				
Received loans	9 780	5 920	3 860	65,20%
Loans payables	(429)	(268)	(161)	60,07%
Payments under finance leases	-	(565)	565	-100,00%
Proceeds from interest, commissions, dividends and similar	(51)	(51)	-	0,00%
Interest payments	(199)	(86)	(113)	131,40%
Others		(5)	5	-100,00%
Net cash flow from financing activities	9 101	4 945	4 156	84.04%



40/ FINANCIAL RISK MANAGEMENT

In the normal course of business the Company may be exposed to various financial risks, the most important of which are market risk (including currency risk, changes in the fair value and price risk), credit risk, liquidity risk and risk of interest-bearing cash flows. The general risk management is focused on the difficulty of forecasting the financial markets and to achieve minimizing the potential negative effects that could affect the financial results and position of the Company. The financial risks are identified, measured and monitored through various control mechanisms in order to establish adequate prices for the products and services of the Company and attracted their loan capital, as well as to assess adequately the market circumstances of these investments and the forms for maintenance of free liquid funds through preventing undue concentration of a particular risk.

Risk management is carried out by the management of the Company under policies adopted by the Board of Directors of the Company. The Board of Directors has approved the basic principles of general financial risk management, based on which have developed specific procedures for the management of individual specific risks such as currency, interest rate, credit and liquidity risk and the use of non-derivative instruments.

Currency risk

Currency risk is linked to adverse movements in the exchange rate of the foreign currency against the Bulgarian lev in future business operations, recognized foreign currency assets and liabilities and the net investments in foreign companies.

Most of the company's operations are usually denominated in Bulgarian levs and / or in euro.

In order to control the foreign currency risk in the company, a system of planning of import deliveries, for foreign currency sales as well as procedures for daily monitoring of movements in the dollar exchange rate and control of forthcoming payments is introduced.

Price risk

The Company is exposed to price risk on three main factors:

- A) rising labor costs;
- B) competition from smaller companies collectives;
- C) competition from the Asian segment;

To minimize this impact, the company applies a company strategy to optimize costs, validate alternative suppliers and subcontractors. Price policy is a function of three main factors - cost structure, competitor prices and purchasing power to customers.

Credit risk

Credit risk is the risk that the customers of The Company will not be able to pay in full and in time with the amounts due under trade receivables. The latter are presented in the consolidated statement of financial position at net value after deducting the impairment allowance for doubtful and bad debts.

Such impairment is made where and when events have existed identifying losses from uncollectible according to previous experience. Company deals with counterparties with a history of relationships of its main markets by partnering with a number of Bulgarian and foreign companies and institutions.

Credit risk is minimized by procedures in the selection and ongoing monitoring of liquidity and financial stability of trading partners. In default of receivables from these counterparties Company has set a deadline of 30 days after starting up collection of receivables. Deferred payments (credit sales) for contractors are available only to customers who have a long history and trade cooperation with The Company's sound financial position and lack of violations in compliance with the agreed credit terms.

The credit policy of The Company provides that each new customer is analyzed for creditworthiness before offering standard terms of delivery and payment. Analysis, performing by The Company includes but is not limited to visiting customers, gathering information on monthly turnovers.

Collection of receivables is controlled directly by the Executive Director of company and respectively by the management of the subsidiaries. Their responsibility is operative to control and regulate receivables in conformity with the market and the needs of The Company.



The Company has developed policies and procedures to assess the creditworthiness of their counterparties and credit rating and credit limits by customer group.

The Company's management currently monitors and adjusts the forming concentration of receivables from customers and counterparties.

Cash in The Company and settlement operations are concentrated in different first-class banks. In the distribution of cash the management take into consideration a number of factors, including the size of the capital, security, liquidity, credit potential and rating of the bank and others.

Liquidity risk

Liquidity risk is the adverse situation, that the Company will not be able to meet unconditionally all its obligations within their maturity.

The Company generated and maintained a significant amount of cash. Internal source of liquidity is the Company's main business, generating sufficient operational flows. External sources of funding are banks and other permanent partners. A significant impact on the company's liquidity may be the change in the dollar's exchange rate in relation to US dollar positions and the market dynamics if it deviates from projected expectations. In order to isolate potential liquidity risk, the company operates a system of alternative mechanisms of action and forecasts, the ultimate effect of which is the maintenance of good liquidity, respectively the ability to finance its business activity. This is complemented by ongoing monitoring of the maturity of assets and liabilities and control of outgoing cash.

Risk of interest-bearing cash flows

In the structure of the Company's assets, earning assets are represented by cash, bank deposits and loans that have a fixed interest rate. On the other hand, the Company's borrowings in the form of long-term and short-term loans are usually with variable rate. This fact partly puts cash flows of the Company depending on the interest rate risk. Covering this risk is achieved in two ways:

a) optimize the sources and structure of credit resources for achieving relatively lower cost of borrowings; and

b) combined structure of interest rates on loans comprising two components - a fixed and a variable ratio between them, as well as their absolute value can be achieved and maintained in a favorable rate for the Company. The fixed component is relatively low absolute value and a large enough share of the total rate. This fact eliminates the possibility of a significant change in interest rates at a possible update of the variable component. This minimizes the likelihood of an unfavorable change in cash flows.

The management of the company is currently monitoring and analyzing its exposure to changes in interest rates. Different scenarios of refinancing, renewal of existing positions and alternative financing are simulated. Based on these scenarios, the effect on financial result and equity is measured when changing with certain points or percentages. For each simulation, the same assumption of interest rate change applies to all major currencies. Calculations are made for significant interest-bearing items.

Capital risk management

With the management of the capital, the company aims to create and maintain opportunities to continue to operate as a going concern and to ensure the appropriate return of the invested funds to shareholders, the economic benefits of other stakeholders and participants in its business, and to maintain an optimal capital structure, to reduce the cost of capital.

The Company is currently monitoring the capital adequacy and structure on the basis of the debt ratio. This ratio is calculated between the net debt capital and the total amount of the committed capital. Net debt capital is defined as the difference between all borrowed funds as stated in the statement of financial position and cash and cash equivalents. The total amount of committed capital is equal to equity and net debt capital.

Fair Values

Fair value is generally the amount for which an asset may be exchanged or an obligation to be paid under normal terms of trade between independent, willing and informed counterparties. The policy of the company is to disclose in its financial statements the fair value of financial assets and liabilities.



The fair value of financial instruments that are not traded on active markets is determined using valuation techniques based on different valuation techniques and management assumptions made on the basis of market conditions at the date of the statement of financial position.

The concept of fair value implies the realization of financial instruments through sale. In most cases, however, especially with respect to trade receivables and payables, loans and deposits, the Company expects to realize these financial assets through their full back pay or, respectively, repayment over time. Therefore, they are presented at amortized cost.

Also, the bulk of financial assets and liabilities are either short-term in nature (trade receivables and payables, short-term loans) or are reflected in the statement of financial position at market value (bank deposits, securities investments) fair value is approximately equal to their carrying amount.

Investments in subsidiaries and, exceptionally, part of investments in other minority interests, which are stated at cost (cost).

As long as there is still insufficient market experience, stability and liquidity for purchases and sales of certain financial assets and liabilities, there is no sufficient and reliable quote at market prices, which is further complicated at the current stage of the ongoing financial crisis in the country.

The management of the Company considers that, under the circumstances, the estimates of financial assets and liabilities presented in the statement of financial position are as reliable, adequate and reliable as possible for the purposes of financial reporting.

41/ RELATED COMPANIES TRANSACTIONS

Affiliates	Type of connectivity	Connectivity period
Sirma Solutions	subsidiary	25.4.2008 until now
Ontotext	subsidiary	31.3.2014 until now
Ontotext USA	entity under indirect common control	31.3.2014 until now
EnfView Systems Sofia	subsidiary	4.11.2009 until now
Sirma AI	subsidiary	25.4.2008 until now
Daticum	entity under indirect common control	19.1.2009 until now
Sirma Business Consulting	entity under indirect common control	25.4.2008 until now
Sirma ISG	entity under indirect common control	30.5.2011 until now
Panaton Soft Inc.	entity under indirect common control	1.1.2013 untill 15.01.2015
Sirma ICS	entity under indirect common control	24.02.2016 until now
Sirma Medical Systems	subsidiary	28.04.2016 until now
Sirma Group Inc.	subsidiary	15.03.2016 until now
Pirina Technologies	subsidiary	01.09.2008 untill 31.07.2014
Pirina Technologies	other related parties	31.07.2014 until now
Sirma Media	subsidiary	01.01.2009 untill 31.07.2014
Sirma Media	other related parties	31.07.2014 until now
Sirma Sha	entity under indirect common control	17.02.2017 until now
Sirma CI	subsidiary	26.10.2018 until now



The types of connectivity are:

Subsidiary
 A company under common control with key management personnel
 Other related parties

Purchases

			31.12.2018	31.12.2017
Туре	Type of Connectivity	Description	BGN '000	BGN '000
Materials	1	Inventory	(1)	-
Materials	1	Computer Components	(4)	(1)
Materials	1	Office supplies	(3)	(3)
External services	1	Maintenance and repair of the office	-	(11)
External services	2	Internet	(17)	(17)
External services	1	Fees and commissions	-	(1)
External services	1	Consulting services	-	(7)
External services	2	Consulting services	(4)	-
External services	3	Advertising and marketing	-	(32)
External services	1	Software services	(592)	(3 177)
External services	2	Software services	(200)	-
External services	1	Rental software license	(3)	-
External services	2	Rental software license	(79)	-
Interest on deposits	1	Interest expense on deposits	(6)	(7)
Interest on loans	1	Interest expense on loans	-	(15)

Sales

			31.12.2018	31.12.2017
Туре	Type of Connectivity	Description	BGN '000	BGN '000
Services	1	Subscriptions	95	-
Services	1	Administrative, accounting services	661	709
Services	2	Administrative, accounting services	179	132
Services	3	Administrative, accounting services	20	20
Services	1	Consulting services	-	133
Services	1	Consumables	23	23
Services	2	Cabinet rental	-	13
Services	1	Rentals	262	251
Services	2	Rentals	37	54
Services	1	Cloud services	3 316	-
Services	1	Revenue from the sale of licenses	575	625
Services	2	Revenue from the sale of licenses	76	-
Services	1	Technical Support	29	29
Services	2	Technical Support	14	14
Interest on loans	1	Interest income on loans	221	204
Interest on loans	2	Interest income on loans	18	13
Interest on loans	3	Interest income on loans	41	34

The conditions under which the transactions are executed do not deviate from the market for such transactions.



42/ IMPACT OF THE INITIAL ADOPTION OF IFRS 9 AND IFRS 15

This Note presents the impact on the Company's financial statements for 2018 of the first-time adoption of IFRS 9 Financial Instruments and IFRS 15 Revenue from Contracts with Customers as at 1 January 2018. IFRS 9 Financial Instruments replaces the provisions of IAS 39 Financial Instruments: Recognition and Measurement with respect to the recognition, classification and measurement of financial assets and financial liabilities, the derecognition of financial instruments, impairment of financial assets and hedge accounting. It introduces new classification criteria and groups of financial assets, respectively new rules for their subsequent measurement and for the recognition of interest income. The other material difference is the adoption of a new approach to measure impairment – based on expected credit losses.

IFRS15 Revenue from Contracts with Customers replaces IAS 18 Revenue, which covers goods and services contracts, and IAS 11 Construction Contracts, which covers construction contracts, and the respective SIC and IFRIC. The new standard establishes a model of five steps to account for contracts with customers. This model is based on the principle that revenue is recognised when control of a good or service transfers to a customer at an amount reflecting the consideration the entity expects to be entitled to in return for the transfer of goods or services to the customer. The adoption of the new IFRS 15 Revenue from Contracts with Customers significantly increases the use of judgement in the recognition of revenue and provides guidance for accounting for contract expenses.

The adoption of IFRS 9 Financial Instruments has resulted in certain changes in the accounting policies and an adjustment to the amounts of the respective items recognised in the financial statements.

The adoption of IFRS 15 Revenue from Contracts with Customers has resulted in changes in the accounting policies, but has not necessitated adjustments to the respective items recognised in the financial statements.

43/ EVENTS AFTER THE END OF THE REPORTING PERIOD

Purchase of "Ontotext" from "Sirma AI"

On January 18, 2019, a contract was concluded on the grounds of Art.15 of the Commercial Act and a decision of the General Meeting of Shareholders of Ontotext JSC, by which the commercial enterprise of Ontotext JSC, as a set of rights and obligations and factual relations created by realization of its previous business activity was sold to Sirma Al JSC for a price equal to the net asset value, according to the balance sheet of the company as at 17.01.2019 - BGN 21 249 612,89.

Sale of a separate part of "Sirma Solutions" to "Sirma Al"

On 23 January 2019, a contract was signed under which the subsidiary Sirma Solutions transferred the ownership right to a separate part of its trading company Sirma Solutions, UIC 040529004 as a separate set of rights, obligations and factual relations, created in the course of his previous commercial activity to Sirma AI, for a price of BGN 20 912 384.19 (twenty million nine hundred and twelve thousand three hundred eighty four and four hundred levs). In the separate part of the enterprise are included assets - software modules, contracts with receivables on them and employees.

Sale of a separate part of "Daticum" to to "Sirma Al"

On 7 March 201, a contract was signed under which the subsidiary Daticum transferred the ownership right to a separate part of its trading company "Daticum", UIC 200558943, as a separate set of rights, obligations and factual relations, created in the course of his previous commercial activity of "Sirma AI", for a price of BGN 1 241 786.93 (one million two hundred and forty thousand and one thousand seven hundred and eighty-six leva and 93 st.). In the separate part of the enterprise are included assets - cloud platform and employee liability.



44/ OTHER

These financial statements are prepared in accordance with the going concern principle.

The management of the Company considers that it is in force and will remain in force, there are no plans and intentions for the cessation of the activity.

Sofia

07.03.2019

CEO:

Tsvetan Alexiev