

ACCORDING TO ANNEX 9  
TO ARTICLE 28 (2) OF ORDINANCE № 2 OF 17.09.2003

**INSIDE INFORMATION FOR SIRMA GROUP HOLDING JSC  
AS OF 31.12.2020**

***1. Change of persons exercising control over the company.***

During the period there was no change of persons exercising control over the company.

***2. Opening insolvency proceedings for the company or its subsidiary and all material steps involved in the proceedings.***

During the period under review, no insolvency proceedings were opened for the company.

***3. Conclusion or execution of significant transactions.***

In 2020, the company made several large contracts with customer and subcontracts:

Purchases:

- Deal 1 for BGN 146 thousand
- Deal 2 for BGN 55 thousand
- Deal 3 for BGN 44 thousand

Sales:

- Deal 1 for BGN 2 047 thousand
- Deal 2 for BGN 1 596 thousand
- Deal 3 for BGN 227 thousand

***4. A decision on the conclusion, termination and cancellation of a joint venture agreement.***

No decision for concluding, termination and cancellation of a joint venture was taken during the period considered.

***5. Change of auditors of the company and reasons for the change.***

During the period there was no change of auditors of the company.

***6. Conclusion or execution of contracts not related to the Company's ordinary activities.***

During the period under review, there were no signed or executed contracts that were not related to the company's ordinary activities.

**7. Formation or termination of a court or arbitration case relating to the debts or claims of the company or its subsidiaries with a claiming price of at least 10 percent of the company's equity.**

No court or arbitration case was opened or terminated during the period under review.

**8. Purchase, sale or pledge of shares in companies from the issuer or its subsidiary.**

During the period under review, there was no purchase, sale or pledge of shareholdings in commercial companies by the issuer or its subsidiary.

**9. Other circumstances that the Company considers may be relevant to investors in taking a decision to acquire, sell or continue to hold publicly available securities:**

**- Acquisition of more than 5% share of the Company's capital by a shareholder.**

According to the requirements of Article 148b of the Public Offering of Securities Act, we inform you of the following:

On 14.08.2020 the office of Sirma Group Holding JSC received a notification from the investment intermediary FFBH AD, Sofia for significant share participation and acquisition of more than 5% share of the company's capital by their client, as follows:

- Name of the shareholder holding 5% or more of the voting rights: Ivo Petrov Petrov
- Date on which the voting right of the person has transferred the thresholds under Art. 145, para 1 of LPOS: 10.08.2020
- Total sum of voting rights of Ivo Petrov Petrov: 2 960 570 voting shares or 5,03% of the company's capital

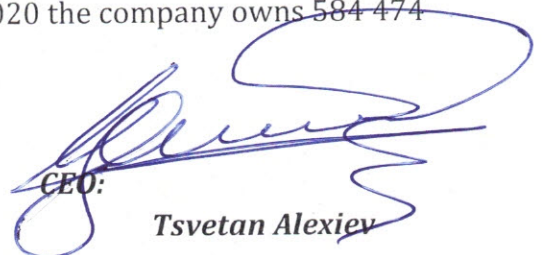
As of 31.12.2020 Ivo Petrov Petrov owned 4 400 000 voting shares or 7,41% of the company's capital.

**- Repurchase of own shares**

With a decision of the General Meeting of Shareholders of "Sirma Group Holding" JSC dated 26 August 2019, on 16 September 2020 the Company repurchased 109,750 of its shares at an average price of BGN 0.68 per share at a total price of BGN 74 630. The shares represent 0,1848872% of the company's capital. The purchase was made on the „Bulgarian Stock Exchange – Sofia“ AD. As of 31.12.2020 the company owns 584 474 own shares (0,98% of the capital).

**Date: 19.03.2021**

**Sofia**

  
CEO:  
**Tsvetan Alexiev**