

"SIRMA GROUP HOLDING" JSC

**ADDITIONAL INFORMATION CONCERNING CIRCUMSTANCES
CURRENT AS OF 31.12.2021**

(ACCORDING TO ART. 33, PAR. 1, ITEM 7 OF ORDINANCE № 2 FROM 17. 09. 2003)

This document provides information according to the requirements of Art. 33, par. 1 of Ordinance No. 2 of 17.09.2003 on Prospectuses for Public Offering of Securities and Disclosure of Inside Information by Public Companies and Other Issuers of Securities

1. Information about changes in accounting policies during the reporting period, the reasons for their performance and how they affect the issuer's financial result and equity;

There is no change in the accounting policy of "Sirma Group Holding" JSC (the company) for the reporting period.

2. Information on changes in the economic group of the issuer if it participates in such a group;

On 21 July 2021 „EngView Systems Sofia“ JSC, part of Sirma Group, established its subsidiary in Germany - EngView Systems GmbH. The new company is 100% owned by „EngView Systems Sofia“ JSC, with a capital of EUR 200 000.

On 16 November 2021, after receiving approval from the Commission for Protection of Competition, "Sirma Group Holding" JSC signed a contract with the shareholders of the IT company "Sciant" AD for the acquisition of a majority stake, as follows:

- Acquired share: 80% (eighty percent) or 200 000 (two hundred thousand) shares of the company;
- Option: the contract also provides for an option for „Sirma Group Holding“ JSC for subsequent acquisition of the remaining 20% of the company's shares on 01.04.2024.

With the implementation of this contract, "Sciant" AD officially became part of "Sirma Group Holding" JSC.

3. Information on the results of organizational changes within the issuer, such as transformation, sale of companies in the economic group, in-kind contributions from the company, rental of property, long-term investments, cessation of activity;

On 18 January 2021, the company released its investment in the associated company "E-Dom Management" Ltd., selling its stake at a nominal value of BGN 7 thousand.

On 30 December 2021, the company "Sirma Mobile" AD, in which "Sirma Solutions" owned 40% of the capital, was finally liquidated and ceased its activities.

4. Opinion of the Management Authority on the feasibility of making published forecasts for the results of the current financial year, taking into account the results of the current quarter, as well as information on the factors and circumstances that will influence the achievement of the forecast results for at least the next quarter ;

The Company has no published estimates for the current financial year as well as information on the factors and circumstances that will affect the achievement of the forecast results for at least the next quarter.

5. For public companies - data about the persons holding directly and indirectly at least 5 per cent of the votes in the general meeting at the end of the respective quarter and the changes in the votes held by the persons for the period from the end of the previous quarter;

The persons holding directly and indirectly at least 5 per cent of the votes in “Sirma Group Holding” JSC at the end of 2021 are respectively the following:

Shareholders	Number of shares at 31.12.2021	% Shareholding	% shareholding with deducted repurchased own shares
Georgi Parvanov Marinov	5 269 748	8,88%	8,97%
Tsvetan Borisov Alexiev	4 965 753	8,37%	8,45%
Chavdar Velizarov Dimitrov	4 750 786	8,00%	8,08%
Veselin Antchev Kirov	4 700 786	7,92%	8,00%
Ivo Petrov Petrov	4 500 000	7,58%	7,66%
Ognyan Plamenov Chernokozhev	3 741 620	6,30%	6,37%

During the period 01.10.2021 – 31.12.2021 there were changes in the number of shares held by shareholders with at least 5 per cent of the votes of the General Meeting of Shareholders of “Sirma Group Holding” JSC:

- Shareholder Ivo Petrov Petrov has acquired additional 100 000 shares and owns 8.37% of the company's capital.

6. For public companies - data about the shares held by the issuer's management and supervisory authorities at the end of the respective quarter as well as the changes occurring for the period since the end of the previous quarter for each individual;

The shares held by the management and supervisory authorities of the company at the end of 2021 are as follows:

Shareholders	Number of shares at 31.12.2021	Number of shares at 31.12.2020	Nominal VALUE (BGN)	Value (BGN)	% Shareholding	% shareholding with deducted repurchased own shares
Georgi Parvanov Marinov	5 269 748	5 269 748	1	5 269 748	8,88%	8,97%
Tsvetan Borisov Alexiev	4 965 753	4 865 753	1	4 965 753	8,37%	8,45%
Chavdar Velizarov Dimitrov	4 750 786	4 750 786	1	4 750 786	8,00%	8,08%
Atanas Kostadinov Kiryakov	2 887 524	2 887 524	1	2 887 524	4,86%	4,91%
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	17 887 344	17 787 344		17 887 344	30,14%	30,44%

During the period 01.01.2021 – 31.12.2021 the member of the Board of Directors Tsvetan Borisov Alexiev has acquired 100 000 additional shares of the capital of the company.

7. Information on pending court, administrative or arbitration proceedings concerning liabilities or receivables of at least 10 percent of the issuer's equity; if the total value of the liabilities or receivables of the issuer in all initiated proceedings exceeds 10 per cent of its own capital, information shall be provided for each production separately;

There are no pending litigation, administrative or arbitration proceedings concerning debts or receivables of at least 10 per cent of the company's equity and taking into account the total value of the debts or receivables of the company in all initiated proceedings exceeding 10 per cent of its own capital.

8. Information about the loans granted by the issuer or its subsidiary, providing guarantees or assuming liabilities in general to one person or its subsidiary, including related parties, indicating the nature of the relationship between the issuer and the person, the amount of unpaid principal, interest rate, repayment deadline, commitment amount, terms and term.

Lender	Recipient of the credit	Relationship with the issuer	Currency	Unsettled principal at 31.12.2021 (BGN '000)	Interest rate	End date of the contract
Sirma Group Holding	Sirma Medical Systems	subsidiary	BGN	816	1,3%, 2,8%, 5,00%	31.12.2021
Sirma Group Holding	Sirma AI	subsidiary	BGN	3 807	1,3% 2,8%, 3,5%, 5%	31.12.2021
Sirma Group Holding	Sirma CI	subsidiary	BGN	63	1,3%, 2,8%, 5%	31.12.2021
Sirma Solutions	Sirma ISG	a company under common control with key management personnel	BGN	107	6,50%	31.12.2021

Sofia

CEO:

25.03.2022

Tsvetan Alexiev