



"SIRMA GROUP HOLDING" JSC

**ADDITIONAL INFORMATION CONCERNING CIRCUMSTANCES
CURRENT AS OF 31.03.2023**

(UNDER ART. 12, PAR. 1, ITEM 4 OF ORDINANCE №2 FROM 09 NOVEMBER 2021)

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;

The interim consolidated 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 2016 and have been accepted by the Commission of the European Union.

More detailed information about the Group's accounting policies and changes in it can be found at note 3 and 4 in the Notes to the interim consolidated financial statements for the period.

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

On 10.02.2023 "Ontotext" AD - a subsidiary of "Sirma Group Holding" JSC, changed its name to "SAI" AD and a new Board of Directors of the company was registered in the CR, composed of:

Tsvetan Georgiev Trenchev
Georgi Parvanov Marinov
Yordan Stoyanov Nedev

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 30.03.2023 all actions regarding the sale of shares from the capital of "Sirma AI" AD, which were owned by the subsidiary company "Sirma Solutions" AD, were finalized, according to the decision of the General Meeting of Shareholders of the majority owner "Sirma Group Holding" JSC, held on 15.02.2023, as follows:

- Subsidiary whose shares are subject to disposal: "Sirma AI" AD;
- Subsidiary company owner of the minority share package: „Sirma Solutions“ AD;
- Size of the minority package subject to disposal: 23.80% of the capital of "Sirma AI" AD;
- Transaction value: EUR 9 460 000;
- Buyers of shares:

Purchaser	Type of Shares	Number of Shares	Purchase Price Distribution (EUR)
European Bank for Reconstruction and Development , an international financial institution having its headquarters at Five Bank Street, London E14 4BG, United Kingdom (“ EBRD ”)	Common	1 179 908	6 960 000
	Class A	226 974	
OTX-Partner Korlatolf Felelossegu Tarsasag , a Hungarian limited liability company with registration number 01-09-410198 and having its registered address at 53 Alkotás utca, MOM Park C épület V. emelet, 1123 Budapest, Hungary (“ PortfoLion ”)	Common	338 946	2 000 000
	Class A	65 201	
Atanas Kostadinov Kiryakov , Member of the Board of Sirma Group Holding JSC, Bulgaria;	Common	84 905	500 000
	Class A	16 333	
Total:		1 912 267	9 460 000

As a result of the received cash and the transferred shares, the commitments of all parties to the transaction have been completed.

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 Group 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 Q1 2023 are respectively the following:

Shareholders	Number of shares at 31.03.2023	% Shareholding	% shareholding with deducted repurchased own shares
Georgi Parvanov Marinov	5 335 748	8,99%	9,22%
Tsvetan Borisov Alexiev	4 965 753	8,37%	8,58%
Chavdar Velizarov Dimitrov	4 750 786	8,00%	8,21%
Veselin Antchev Kirov	4 700 786	7,92%	8,13%
Ivo Petrov Petrov	4 013 920	6,76%	6,94%
Ognyan Plamenov Chernokozhev	3 741 620	6,30%	6,47%

During the period 01.01.2023 – 31.03.2023 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 Georgi Parvanov Marinov has 66 000 shares more and owns 8,99% 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 Q1 2023 are as follows:

Shareholders	Number of shares at 31.03.2023	Number of shares at 31.12.2022	Nominal VALUE (BGN)	Value (BGN)	% Shareholding	% shareholding with deducted repurchased own shares
Georgi Parvanov Marinov	5 335 748	5 269 748	1	5 335 748	8,99%	9,22%
Tsvetan Borisov Alexiev	4 965 753	4 965 753	1	4 965 753	8,37%	8,58%
Chavdar Velizarov Dimitrov	4 750 786	4 750 786	1	4 750 786	8,00%	8,21%
Veselin Anchev Kirov	4 700 786	4 700 786	1	4 700 786	7,92%	8,12%
Atanas Kostadinov Kiryakov	1 487 524	2 887 524	1	1 487 524	2,51%	2,57%
Yavor Ludmilov Djonev	1 292 746	1 292 746	1	1 292 746	2,18%	2,18%
Martin Veselinov Paev	126 720	126 720	1	126 720	0,21%	0,22%
Yordan Stoyanov Nedev	3 433	3 433	1	3 433	0,01%	0,01%
Peyo Vasilev Popov	100	100	1	100	0,0002%	0,0002%
Total	22 663 596	23 997 596		22 663 596	38,18%	39,11%

During the period 01.01.2023 – 31.03.2023 the member of the BD Georgi Parvanov Marinov has acquired 99 720 shares and the member of the BD Atanas Kostadinov Kiryakov has sold 1 400 000 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 on the loans granted by the issuer or its subsidiary, by their subsidiaries, the collateral provided or the liabilities assumed in total to one person or its subsidiary, including related parties, indicating the names or titles and UIC of the person, the nature of the relationship between the issuer or its subsidiaries and the borrower, the amount of outstanding principal, interest rate, date of conclusion of the contract, including additional agreements, repayment period, amount of commitment, specific conditions other than those specified in this provision , as well as the purpose for which they are granted, in case they are concluded as targets.

Information is contained in item 9 of the Interim consolidated management report of „Sirma Group Holding” JSC for the period.

Sofia

Executive Director:



30.05.2023

Tsvetan Alexiev