

Report

by the Investment Relations Director of „Sirma Group Holding“ JSC

For the activity in 2023

This Investor Relations Activity Report is prepared by Stanislav Tanushev, Investor Relations Director, in accordance with the requirements of Article 116d, paragraph 4 of the Public Offering of Securities Act (POSA).

IRD

In the period from January 01, 2023 to December 31, 2023 the activity of IRD was performed by Stanislav Tanushev.

Main Guidelines

The main objectives and guidelines for the work on investor relations during the year were the requirements of POSA, taking into consideration the changes therein, Regulation 596/2014, The National Code for Corporate Governance, the Program for Good Corporate Governance of „Sirma Group Holding“ JSC as well as the applicable Regulations of the EU.

Registers

During the year, according to the requirements of the regulatory framework, a Register for the disclosed information, as well as a Register of the Board Meetings were kept, in accordance with the „Sirma Group Holding“ JSC document handling practice.

Activity during the year

During the year there was a timely and effective communication between the corporate management of the company and the shareholders, the potential investors, the Bulgarian Stock Exchange, the Financial Supervision Commission and the Central Depository.

For the purpose of disclosure of regulated information, the contract with “Financial Market Services” EOOD for the use of their X3News electronic platform, was renewed. Contrasts with some selected information partners were also signed: Investor.bg and Infostock.bg.

As part of our investors normally use the similar platform of Infostock, in 2023 a contract was concluded for the disclosure of financial information on this platform as well.

The above information media were used for the timely disclosure of regulated, internal and additional information from „Sirma Group Holding“ JSC.

Site

The [Investor Relations](https://sirma.com/) section of the site <https://sirma.com/> was duly supported, and all documents related to the disclosure of information were also published there. The information on this section was published both in the Bulgarian and English languages.

The “[News](http://www.sirma.com)” section on the company's website, www.sirma.com was also duly supported, in order to fully inform investors and stakeholders about the development of products, companies, awards, events, and other news from „Sirma Group Holding“ JSC and its subsidiaries.

Dividends

According to the decisions of the General Meeting of Shareholders and in accordance with the Dividend Policy, in 2023, two dividends (for the six months and annual) for 2022 were distributed. The Investor relations director successfully organized and communicated the process so that all shareholders received their dividend on time.

Reporting Novelties

During the year, the IRD assisted in the successful disclosure of the financial reports using the new ESEF format in accordance with the corresponding new requirements of the FSC.

2023 was also the second year for non-financial reporting of “Sirma Group Holding” JSC, as IRD actively participated in the preparation of the company's second non-financial declaration in accordance with the regulatory requirements. In addition, IRD assists in preparing the company for the transition to the requirements of the Corporate Sustainability Reporting Directive (CSRD). In fulfillment of the new requirements, the Company's Dual Materiality Matrix was created, information was collected on Scope 1 and 2 carbon emissions, the various ESG-related risks and opportunities were analyzed, and the stakeholders of the company's sustainable development were defined.

Information for the Management of “Sirma Group Holding” JSC

During the year, IRD dully followed the methodology for informing the management of “Sirma Group Holding” JSC about the investor structure and its dynamics. IRD was also involved in market research of the markets of importance for “Sirma Group Holding” JSC and its daughter companies, informing the Management with reports and infographics accordingly.

Personalization of Investor Relations

Further to the electronic means for disclosure of information, mentioned above, special attention was given to the personalization of communication with investors and interested persons.

- During the year, managers of “Sirma Group Holding” JSC attended conferences and public discussions, such as: “The Next Big Thing” organized by Bloomberg TV, “Investor Finance Forum”, as well as interviews and articles. On these events the managers of “Sirma Group Holding” JSC shared the Vision of Sirma Group for the future, the targets which the company pursues, the strategy of the company for reaching its objectives as well as technological news and product presentations.

- During the year the news-letter “News from Sirma” continued to be issued. The news-letter is targeted at shareholders and interested persons, who have subscribed for it. Its issue was monthly. The platform, on which the news-letter is launched, offers the possibility for new subscribers, as well as easy un-subscription and is in total compliance with the regulations for protection of personal data.
- All direct questions, put forth by investors and interested parties, received a timely and comprehensive response.

Shareholders’ Meeting

IRD supported the successful organization of the two General Shareholders Meetings of „Sirma Group Holding“ JSC during the year: on January 9, 2023, February 15, 2023, and June 15, 2023. In order to ensure a wider representation of the shareholders at the meetings, the practice of remote voting was again used during the year, as described in Art. 34a of the Articles of Association of the Company.

Association

During 2023, the participation of the IRD of „Sirma Group Holding“ JSC in the Association of the Bulgarian Investor Relations Directors was renewed. This provided methodological and best-practice support to the IRD of „Sirma Group Holding“ JSC.

Prepared by Stanisav Tanushev
May 23, 2023
Sofia

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