

Report

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

For the activity in 2024

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, 2024 to December 31, 2024 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.

In addition to regulatory compliance, "Shareholder Care" was identified as a material topic for „Sirma Group Holding“ JSC, and transparency and accountability as important elements of corporate governance. Accordingly, the company will make efforts to improve the results of its investor relations work.

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 2024 the contract was renewed 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](https://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 2024, an annual dividend for 2023 was 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.

2024 was also the third year for non-financial reporting of “Sirma Group Holding” JSC, as IRD actively participated in the preparation of the company's third non-financial statement. In addition, IRD assists in preparing the company for the fulfilment of 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.

In 2024, the first Sustainability Report of the Company was developed and subsequently published, which, after the postponement of the implementation of the transposed CSRS requirements by the Bulgarian Parliament in February, is voluntary. The purpose of this voluntary reporting was to preserve the already established tradition of non-financial reporting and to comply with the principle of transparency for investors interested in these topics.

International ESG Rating

During the year, IRD initiated and implemented the rating of “Sirma Group Holding” JSC by an internationally recognized ESG rating organization - the London Stock Exchange Group. The Company achieved 51 points, ranking 303rd in the world among IT service companies. “Sirma Group Holding” JSC is the second company in Bulgaria with such a rating (after the Bulgarian Stock Exchange). The purpose of this endeavor is to help global investors assess the ESG practices of the Company without the need to conduct their own similar analysis.

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’ Meetings

IRD supported the successful organization of the two General Shareholders Meetings of „Sirma Group Holding“ JSC during the year: on June 27, 2024, September 17, 2024, and January 10, 2024 (disclosed at the end of 2024). 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. All meetings had the necessary quorum to be held, and an average representation of 65.86% of the capital at the company's shareholders' meetings was achieved during the year.

Association and membership

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.

The company renewed its membership in the "Green Center" at the Bulgarian Stock Exchange, and during the year it actively participated in the discussions of the new regulatory requirements.

Prepared by Stanisav Tanushev
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Sofia

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