

**REPORT**  
**OF THE AUDIT COMMITTEE**  
**OF SIRMA GROUP HOLDING JSC**  
**for 2024**

**I . GENERAL INFORMATION**

This report of the Audit Committee of Sirma Group Holding JSC has been prepared on the basis of Art. 108, para. 1, item 8 of the Independent Financial Audit and Sustainability Assurance Act, which requires a report on the activities of the Audit Committee to the appointing authority.

**1. Composition of the Audit Committee**

In the third year of its mandate, the Audit Committee operates in the following composition:

- Angel Petrov Kraychev- Chairman of the Audit Committee;
- Alexander Todorov Kolev- Member of the Audit Committee;
- Vesselin Anchev Kirov- Member of the Audit Committee.

**2. Main activities of the Audit Committee**

During the reporting period, the Audit Committee carried out its activities in accordance with the requirements of the Law on Independent Financial Audit and Assurance on Sustainability, as well as within the framework of the Statute of the Audit Committee of Sirma Group Holding JSC (amended and supplemented in accordance with the changes in the Law on Independent Financial Audit and Assurance on Sustainability). The main activities of the Audit Committee were focused on the following areas:

- Monitoring the financial reporting processes in the enterprise;
- Monitoring the effectiveness of internal control systems;
- Monitoring the effectiveness of risk management systems;
- Monitoring the independent financial audit in the enterprise;

- Performing a review of the independence of the registered auditor responsible for the audit and the audit firm in accordance with the requirements of the Law on Independent Financial Audit and Assurance on Sustainability and the Code of Ethics for Professional Accountants of the International Ethics Standards Board for Accountants (IESBA Code).

## II. ACTIVITY OF THE AUDIT COMMITTEE THROUGH 2024 AND FORMULATED FINDINGS AND CONCLUSIONS

At its regular meetings, based on the available information and professional analyses and discussions conducted, in compliance with the requirements of the Independent Financial Audit and Assurance Act and the Public Offering of Securities Act, the Audit Committee of Sirma Group Holding JSC reached the following findings and conclusions regarding the company's activities in 2024.

### 1. Observation of the processes of financial reporting of Sirma Group Holding JSC

The Company prepares separate and consolidated quarterly interim financial statements, separate and consolidated annual financial statements, which it submits to the Financial Supervision Commission and discloses to the public. The Audit Committee reviewed the financial calendar on the Company's website and the information on the publication of periodic information on the Bulgarian Stock Exchange website and found that the separate and consolidated interim and annual financial statements were submitted within the established deadlines. The Disclosure Committee of the Board of Directors also functions during the reporting period in order to support the process of more effective financial reporting and disclosure of financial information.

### 2. Monitoring the effectiveness of internal control systems

The Audit Committee monitored the functioning of the internal control organization and the ongoing control and reporting procedures, as well as the communication of the audit firm with the internal control and the finance and accounting department. The Audit Committee found that financial analyses and financial control were periodically carried out by the management of the current accounting reporting in the company.

### 3. Monitoring the effectiveness of risk management systems

The ongoing risk management is carried out by the company's management. The Investment, Risk and Sustainability Committee functions to assist the Board of Directors. With regard to risks, its main activity is to analyze the existing risks facing Sirma Group Holding JSC and its subsidiaries and to make proposals for minimizing their negative impact. The management believes that detailed knowledge and systematization of risks, their ongoing analysis and timely management are of

fundamental importance for ensuring the successful functioning of the company. The company's management presents detailed information in the Activity Report to the annual financial report.

#### 4. Monitoring the independent financial audit in the enterprise

The independent financial audit of the financial statements of Sirma Group Holding JSC for 2024 is being carried out for the sixth consecutive year by Grant Thornton OOD, with the registered auditor responsible for the audit being Ms. Emilia Marinova. The Audit Committee's observation showed that a favorable environment was created for the implementation of the independent financial audit in terms of joint work with the company's management, the financial and accounting department and the internal control system.

The audit reports confirm that the separate annual financial statement for 2024 and the consolidated annual financial statement for 2024 give a true and fair view of the company's financial position as of 31.12.2024, and the audit opinion expressed is in accordance with the additional reports to the Audit Committee. The audit reports were prepared within the agreed deadlines.

The Audit Committee was presented with the additional reports on the separate and consolidated annual financial statements in accordance with Art. 60, para. 1 and para. 2 of the Law on Independent Financial Audit and Assurance on Sustainability. The reports noted that no significant deficiencies were found in the internal financial control system and the accounting system of the enterprise. The key audit matters were discussed with the Audit Committee and management during the audit.

#### 5. Conducting a review of the independence of the audit firm and the registered auditor responsible for the audit, in accordance with the requirements of the Independent Financial Audit and Sustainability Assurance Act and the Code of Ethics for Professional Accountants of the International Ethics Standards Board for Accountants

The Audit Committee reviewed the Independence Declarations of the audit firm Grant Thornton OOD and the responsible auditor, submitted at the start of the financial audit at the audit planning stage, and was satisfied with the independence of the audit firm and the responsible auditor. The Audit Committee found that the audit firm fulfilled its obligation to publish a transparency report on its website, which includes the information required by law. The Audit Committee requested information on whether the audit firm provides additional services, in addition to the financial audit services of the audited entity, and received assurance from the management of the audited entity that there is no agreement to provide additional services and that such services are not provided, and the audit firm also declared

that no other services are provided outside the financial audit. The Audit Committee also found that in the additional reports the registered auditor has again declared its independence from the audited entity.

As a result of all this, the Audit Committee did not find any violation of the requirements of the Law on Independent Financial Audit and Assurance on Sustainability and the Code of Ethics for Professional Accountants of the International Ethics Standards Board for Accountants regarding independence and was satisfied with the independence of the audit firm and the registered auditor responsible for the audit from the audited entity.

This report was adopted at the meeting of the Audit Committee No. 6/ 02.05.2025.

Sofia, 02.05.2025

Signed by the Chairman of the Audit Committee Angel Kraichev on the Bulgarian copy