

Annex № 4

To Art. 12, par. 1, it.1, art.14 of Ordinance № 2 from 09.11.2021

INSIDE INFORMATION ABOUT THE FACTS AND CIRCUMSTANCES OCCURRED IN SIRMA GROUP HOLDING JSC DURING THE THIRD QUARTER OF 2025

1.1. Change of persons exercising control over the company.

During the period there is no change of persons exercising control over the company.

1.2. Opening insolvency proceedings for the company or its subsidiary and all material steps involved in the proceedings.

During the period under review, no insolvency proceedings were opened for the company.

1.3. Conclusion or execution of significant transactions.

During the period under review, there was no conclusion or execution of significant transactions.

1.4. A decision on the conclusion, termination and cancellation of a joint venture agreement.

No decision for concluding, termination and cancellation of a joint venture was taken during the period under review.

1.5. Change of auditors of the company and reasons for the change.

During the period there was no change of auditors of the company.

1.6. Formation or termination of a court or arbitration case relating to the debts or claims of the company or its subsidiaries with a claiming price of at least 10 percent of the company's equity.

No court or arbitration case was opened or terminated during the period under review.

- 1.7. Purchase, sale or pledge of shares in companies from the issuer or its subsidiary.
 - Acquisition of a separate part of the enterprise "Duo Soft" EOOD

On 15 January 2025, a contract was signed by "Sirma Group Holding" JSC for the acquisition of a separate part of the commercial enterprise with the company "Duo Soft" EOOD, UIC 130235197, entitled "Software developments in the field of academic



recognition" as an independent set of rights, obligations and factual relationships created during the implementation of its previous commercial activity according to the accounting balance sheet at the time of the transfer of the separate part, for a price of BGN 287 000 (two hundred eighty-seven thousand).

- Purchase of a majority stake in the capital of "Sirma Sha" Albania

On 13.06.2025, "Sirma Group Holding" JSC concluded an agreement for the purchase of shares in the capital of "Sirma Sha" Albania with its subsidiary "Sirma Group Inc." USA. The total number of shares is 550, and the total selling price of the shares is 15 000 US dollars. As a result of the transaction, "Sirma Group Holding" JSC became the majority owner of "Sirma Sha" Albania with 55% of the capital.

- Sale of subsidiary Sirma AB Sweden

On 08.08.2025 "Sirma Group Holding" JSC sold its shares in the capital of its subsidiary "Sirma AB" Sweden. The total number of shares is 5000, and their total sale value is 59 000 Swedish kronor. As a result of the transaction, the majority owner of 100% of the capital of Sirma AB is the company Citadellet Likvidationer AB Sweden.

1.8. Other circumstances that the Company considers may be relevant to investors in taking a decision to acquire, sell or continue to hold publicly available securities:

- Submission of Prospectus of Sirma Group Holding AD for approval by the FSC

On 12.09.2025, "Sirma Group Holding" JSC submitted for approval to the FSC its Prospectus for admission of the issuer's existing shares to trading on the Regulated Market of the Frankfurt Stock Exchange (Boerse Frankfurt).

"Sirma Group Holding" JSC informs all interested parties that the interim separate financial statements of the Group as at 30 September 2025 have not been verified by a registered auditor.

Date: 29.10.2025

Sofia CEO:

Tsvetan Alexiev