



Sirma



Digital Excellence With a Sustainable Mindset

2025 Sustainability Report of Sirma Group Holding JSC
and its Subsidiaries



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Highlights Sirma 2025

Business

OFFICES

Bulgaria (HQ)	Germany
Albania	Romania
Brasil	UK
Dubai	USA

EMPLOYEES

800⁺

REVENUE

€67^M

COUNTRIES SERVED

170

CLIENTS

1000⁺

Climate

RENEWABLE ENERGY USED

23% renewable energy used by our HQ office

RENEWABLE ENERGY GENERATED

↑ 19% **87 MWh**

ENERGY INTENSITY

10.6 tCO₂e per 1M EUR

ENERGY INTENSITY

25% improved energy intensity of operations Scope 1&2

ENERGY EFFICIENCY

35% improved energy efficiency of own offices

Governance

DOCUMENTS & POLICIES

90⁺ key internal documents reviewed and updated

ETHICAL CONDUCT

0 reported cases of misconduct and corruption

INITIATIVES

launched **Sirma Knowledge Center** - a new internal information ecosystem

TRAINING

Sirma.AI Enterprise: AI transformation for Sirma Academy

TRAINING

500⁺ employee participations in internal trainings

TRAINING

↑ 30% 1,322 external training participations

PREFERRED EMPLOYER FOCUS

competitive pay, lifelong learning and employee retention

PREFERRED EMPLOYER FOCUS

77% employee satisfaction

DUAL LISTING OF SIRMA'S SHARES

BSE & FSE Liquidity, Visibility, Transparency

SHARES

49% increase in share price and market capitalization



Statement by CEO Tsvetan Alexiev

"Dear shareholders, investors, customers, partners, and colleagues,

2025 was a year in which Sirma continued to demonstrate that sustainability is not a separate program, but rather a way of managing the business – through the lens of results, risk, people, technological ethics, and trust. For us, sustainability begins with economic sustainability—the ability to grow profitably and predictably—and is built upon social responsibility, good governance, and control over the environmental footprint of our operations.

In 2025, we operated in an environment of dynamic market expectations for the technology sector—accelerated AI adoption, heightened cybersecurity requirements, pressure for efficiency, and growing investor sensitivity to risk management (regulatory, technological, human resources, and reputational).



Tsvetan Alexiev
CEO,
Sirma Group Holding JSC

Trust is a competitive advantage

Our response was to remain true to our business model: deep vertical expertise, an AI-first approach, sustainable client relationships, and discipline in execution, supported by a clear framework for managing material ESG issues through due diligence, measurement, and disclosure processes.

For a technology company like ours, risk manifests most strongly where the greatest opportunities lie: in talent, data, security, and the speed of innovation. That is why we view sustainability as the management of impact, risk, and opportunities—an approach embedded in our Sustainability Policy and in our methodology for the annual update of material topics. There are several topics that defined 2025 for Sirma.

First—capital markets and trust. “Caring for our shareholders” has been an important sustainability topic since Sirma went public in 2015. In 2025 this topic became a leading one. This was the year of preparation and finalization of a key strategic move: the dual listing on the Frankfurt Stock Exchange (FSE). Although trading began in February 2026, this event is a direct result of the efforts, discipline, and standards we demonstrated in 2025—transparency, compliance and accountability. All of this leads to improved visibility for Sirma and liquidity for our shares in the coming years.

Second – people and organizational sustainability. For us, employees are a key asset and a leading factor in competitiveness. Our policy is focused on being a “preferred employer,” investing in lifelong learning, maintaining fair practices and practices and creating an environment where motivated employees choose to and contribute their best. In 2025, we continued

to strengthen these areas because talent and culture are our strongest buffer against market volatility.

Third – responsible digitalization and customer value. In our model, sustainability is also reflected in the fact that our technologies help customers improve their efficiency, optimize processes, reduce resource intensity, and enhance security. This is a direct link between our economic sustainability and the sustainability of our customers and end-users.

What we have achieved and where progress has been made

In 2025, we made progress on several fronts.

- **Progress in the ESG governance and reporting framework:** We continued to apply our approach based on CSRD/ESRS logic—identifying material topics, indicators, targets, and disclosures. This is the foundation that allows investors to assess both the impact and the maturity of risk management.
- **Progress on climate and resources:** As an IT company, our primary environmental footprint relates to energy, emissions from electricity consumption, and e-waste management. We have already undertaken measurement and analysis of Scope 1 and 2 emissions, energy efficiency measures, and renewable electricity generation—a foundation upon which we continued to build in 2025.
- **Financial sustainability and discipline:** 2025 brought significant improvements in financial results at the group level, which is key because it is precisely economic sustainability that funds the other dimensions—people, innovation, environment, and governance.

Challenges in 2025 and their impact on the business

In 2025, they were concentrated in three groups:

- **Market and technological dynamics** – an accelerated AI cycle, the need for rapid product adaptation, and data protection. This increases the demands on quality, security, and project risk management.
- **Competition for talent** – for the IT sector, talent remains a strategic risk; that is why we invested in retention, training, and culture.
- **Regulatory and reporting expectations** – expanded compliance related to dual listing, as well as the evolving sustainability and reporting framework, requires capacity, processes, and internal expertise, which we are purposefully building.

Our short- and long-term vision

Short term (next 12–24 months) our ambition is clear:

to capitalize on the international visibility and standard of transparency that dual listing in Frankfurt brings;

to strengthen the management of material ESG issues through even better metrics, internal controls, and reporting;

to continue improving energy efficiency and increasing the share of renewable energy in our operations, where applicable and economically justified.



Long-term our vision is for Sirma to establish itself as a European technology group that creates value for investors through sustainable growth and discipline, and for society through responsible digitalization. To be a company where trust is a competitive advantage—trust built through responsible partnerships, transparency toward shareholders, and a stable culture that attracts and develops talent.

In conclusion, 2025 has reinforced our conviction that sustainability is the most logical business approach: it reduces risk and costs, increases efficiency, and strengthens our relationship with investors and customers. I am grateful to the Sirma team, our partners, and our shareholders for their trust and support. We are entering the next stage of development with confidence—with a clear direction, higher standards, and the ambition to grow sustainably and with international visibility.”

Tsvetan Alexiev
CEO, Sirma Group Holding JSC



Stanislav Tanushev
Investor Relations and
Sustainability Director,
Sirma Group Holding JSC

We embed sustainability at the core of our operations

Scope: Statement by the Sustainability Director, Sirma Group Holding JSC Stanislav Tanushev

“In today’s business environment, digital transformation and sustainable development are interrelated and mutually reinforcing areas. Sirma views sustainability as a key principle in the development of its digital solutions and management approaches, aiming to create long-term value for all stakeholders. By integrating sustainable thinking into technological development, the company supports responsible growth, greater efficiency, and the strengthening of market and investor confidence.

At Sirma Group Holding JSC and our subsidiaries—collectively Sirma—we embed sustainability at the core of our operations. We embrace the United Nations World Commission on Environment and Development’s definition: **the ability to meet present needs without jeopardizing future generations**, achieved through balancing economic growth, environmental protection, and social well-being.

Sirma has disclosed publicly its sustainability initiatives since 2022, however our sustainability actions have been with us since incorporation. Sustainability reporting requirements have been dynamic in Europe in the past 2 years. This year Sirma is officially not required to disclose sustainability data. Yet, we maintain the same commitment to

sustainability reporting as in the past. For 2025 Sirma is providing voluntarily its non-financial information using the guidelines provided in the Corporate Sustainability Reporting Directive 2022/2464 (CSRD) and the standards thereto (ESRS) as they stand in March 2026.

Looking at the various material sustainability topics for Sirma, in 2025 the focus was yet again on the social ones. For an IT software and service company these are of utmost importance – we can provide a good service only once and we need qualified and motivated employees to do so. The topics “Fair Employer”, “Preferred Employer”, and “Lifelong Learning” stayed strong during the year.

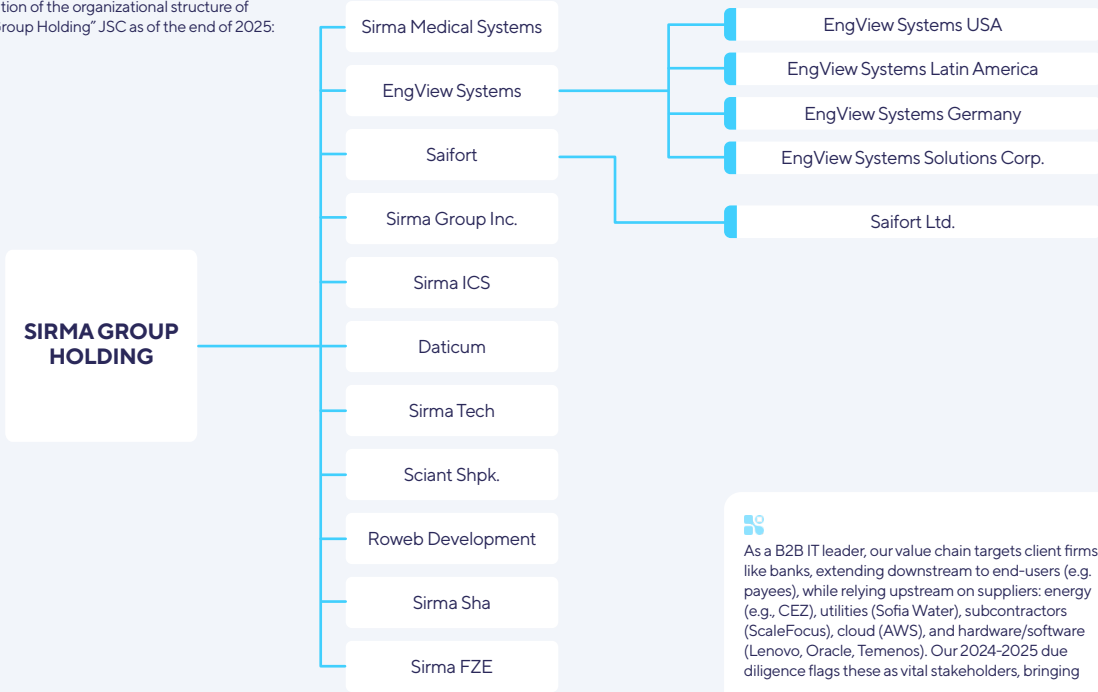
2025, brought something new for Sirma. The Governance topic “Shareholder care” expanded largely its importance. We have always taken great care to achieve full compliance with Bulgarian and EU regulations, as well as maximum transparency of operations and rigorous protection of our shareholder rights. This year, however, the topic expanded to include the Frankfurt Stock Exchange rules and German shareholder protection following the double listing of Sirma on the German market. Compliance and shareholder care were strongly enhanced.

Given 2025 Bulgarian legislative updates delaying CSRD transposition this unaudited report is prepared on a consolidated basis, mirroring our financial reporting scope across all majority-owned subsidiaries. The financial details are described in our Annual Management Report, Consolidated Financial Statements, and Notes. The Sirma Group is united under shared strategies, values, policies, governance visions, and personnel practices.





Visualization of the organizational structure of "Sirma Group Holding" JSC as of the end of 2025:



with them specific risks, and opportunities [see Stakeholders and Materiality]. Sustainability analysis centers on our geographic offices. We exclude seven immaterial smaller offices (<1% employees in 2025) due to immaterial impact, aggregating their staff into larger units.

- For oversight, we track indicators by key countries:
- **Bulgaria: 9 offices**
Sofia (x4), Varna (x2), Plovdiv (x2), Ruse (x1);
 - **Albania: 2 offices**
Tirana (x2)
 - **Romania: 3 offices**
Bucharest, Pitesti, Craiova

Finer breakdowns—by company, vertical, city, or office—hold no material weight, owing to our consistent business performance, shared infrastructure, uniform environmental/social impacts, aligned risks, and collaborative projects across teams and locations.

This report covers events and achievements from 2025 and is published together with the audited consolidated financial statements for 2025. At the same time, some of the topics covered in the report are directly related to an event that occurred in early 2026, namely: the dual listing of the Company's shares on the Frankfurt Stock Exchange.

Investor information, ESG updates and additional company news may be accessed on the [dedicated section of our website](#)."

Stanislav Tanushev
Investor Relations and Sustainability Director,
Sirma Group Holding JSC

As a B2B IT leader, our value chain targets client firms like banks, extending downstream to end-users (e.g. payees), while relying upstream on suppliers: energy (e.g., CEZ), utilities (Sofia Water), subcontractors (ScaleFocus), cloud (AWS), and hardware/software (Lenovo, Oracle, Temenos). Our 2024-2025 due diligence flags these as vital stakeholders, bringing



The Business Model of Sirma

Organization

The companies from the economic group of Sirma Group Holding JSC form one of the largest ICT holding companies in Bulgaria with over 33 years of history. The company develops mainly in the information technology sector.

Sirma is a regional leader in the field of IT services, software development, and system integration. The group has a set of its own innovative technologies, in-depth expertise in a number of economic verticals, a diverse product portfolio, and a growing market share in Europe and North America.

In 2015 Sirma was listed for trading on the Bulgarian Stock Exchange after the successful public offering of shares. In early 2026 Sirma achieved a dual listing with its shares being accepted for trade on the Frankfurt Stock Exchange.

Added Value

Sirma is a B2B IT service provider. Tapping into its accumulated vast business knowledge of vertical technology solutions, Sirma anticipates its clients' needs.

Mission

We help companies transition to intelligent enterprises, by rendering to them software technologies for digitalization and transformation.

The company facilitates organizations to understand, incorporate in their business and apply the latest technology solutions. In doing so, Sirma helps its clients:

-  **Improve their business processes**
-  **Increase efficiency**
-  **Strengthen competitiveness**
-  **Enhance security**
-  **Boost productivity**

Products and Services

The companies of Sirma Group offer the following technology solutions, and services linked with them to their clients:

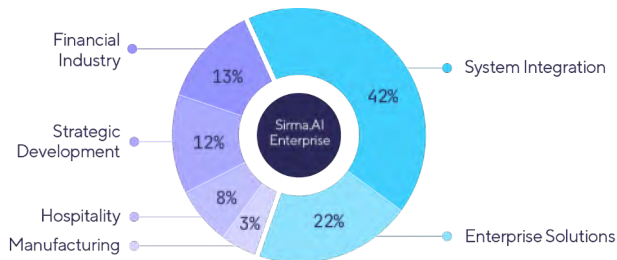




Serviced Client Groups

Currently, companies in the Group operate domestically and internationally in 6 client business groups, "sectors" or "verticals": Financial Institutions and Fintech, Insurance Institutions, Industrial Software, Healthcare, Logistics and Transport, and Hospitality. Although Sirma offers similar IT products and services to each different vertical, over time the Company accumulates knowledge and expertise that are specific to the different client groups/verticals. This competence provides added value for clients from the different verticals and improves the results of the offered IT products and services.

SIRMA REVENUE BY EXPERTISE 2025



FEATURED CLIENTS



INDUSTRIES



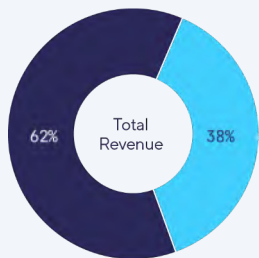
SERVICES



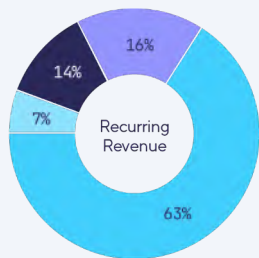


Client Sustainability

FINANCIAL PERFORMANCE RECURRING REVENUE



- Total Recurring Revenue - 49,415 '000 BGN
- Other Revenue - 81,371 '000 BGN

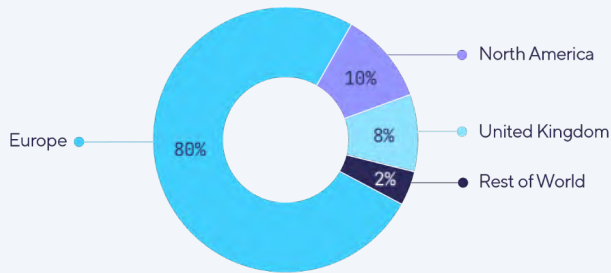


- IT Systems Development and Management - 31,259 '000 BGN
- Long-Term Contract Services - 7,795 '000 BGN
- Support and Service - 7,048 '000 BGN
- Subscriptions and Licenses - 3,313 '000 BGN



Geographic Penetration

REVENUE BY GEOGRAPHIC MARKETS 2025



- Europe - 105,231 '000 BGN
- North America - 12,638 '000 BGN
- United Kingdom - 10,292 '000 BGN
- Rest of World (Asia, South America, Australia, Africa) - 2,625 '000 BGN





Financial Performance

Information on Sirma's financial performance in 2025 is included in the Consolidated Management Report, the Financial Statements, and the Notes thereto, which are published together with this report. Here are some important highlights:

REVENUE 2025

130 M BGN

↑ 30.77%

EBITDA

10.5 M BGN

↑ 80.68%

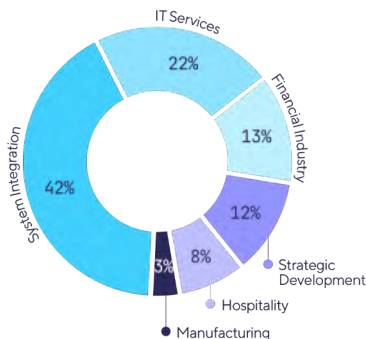
NET PROFIT

4 M BGN

↑ 269.66%

(Percent changes are calculated relative to 2024)

Revenue by Segment



Risks

As an IT company operating in a dynamic and highly competitive environment, we are exposed to a range of risks driven by rapid technological advancements, including the accelerated adoption of artificial intelligence, evolving cybersecurity threats, and increasing regulatory expectations. In this context,

our key risks span operational, technological, and compliance-related areas, as well as those linked to human capital and data protection.

We systematically identify, assess, and manage these risks through established internal processes and control mechanisms, with further details outlined in the relevant internal policies and documents.

Our principal ESG risks are associated with energy consumption and carbon footprint management, the attraction and retention of talent, diversity and inclusion, and ensuring high standards of cybersecurity, data protection, and responsible AI use.

A more detailed description of these risks, along with the measures undertaken to mitigate them, is provided in the sections dedicated to material topics below in this report and the "[Risk Management Policy](#)" of Sirma.

Risk Management

At Sirma risk management is embedded in a dedicated policy framework that ensures a consistent and proactive approach to identifying, assessing, and mitigating risks across the organization. The core elements of this framework include:

Risk Identification:

Sirma identifies and documents risks across all areas, including cybersecurity, operational, financial, and compliance. Employees report relevant risks, which are escalated to the [Committee for Investments, Risk and Sustainability](#) to the Board of Directors of Sirma Group Holding JSC.

Risk Assessment:

Risks are evaluated based on their likelihood and potential impact on the Group's sustainability and business objectives. Sirma uses a Risk Matrix (see "[Risk Management Policy](#)") to classify risks as high, medium, or low priority, guiding resource allocation for mitigation.

Risk Mitigation:

Mitigation strategies are developed and assigned to responsible individuals, documented, and monitored for effectiveness, with outcomes summarized in the Risk Matrix.

Risk Monitoring and Review:

The Committee for Investments, Risk and Sustainability continuously monitors mitigation measures and periodically reviews risks, adjusting strategies as needed in response to internal or external changes.

Risk Reporting:

Regular reports on risks, mitigation efforts, and emerging threats are provided to senior management and the Board. Quarterly updates are included in the Management Reports, which Sirma discloses publicly.



Risk Management Responsibilities

OVERSEE

Board of Directors

The BD is responsible for providing oversight and direction for the risk management process. They ensure that adequate resources are allocated for risk management activities and that risk management objectives are aligned with the organization's strategic goals.

COORDINATE

Committee for Investments, Risk and Sustainability

The Committee is responsible for coordinating risk identification, assessment, mitigation, and monitoring activities across the organization. They facilitate risk management training for employees, provide risk management support for the Board of directors, and ensure guidance on risk-related matters.

IMPLEMENT

Senior Management

Accountable for implementing and enforcing the risk management policy, overseeing risk assessments, and ensuring that appropriate controls are in place.

REPORT

Employees

All employees are responsible for adhering to risk management policies and procedures, promptly reporting any potential risks or incidents, and actively participating in risk assessment and mitigation activities within their respective roles.

Resilience and Sustainability

Sirma's sustainability largely stems from the strong diversification of the Company's activities—diversification in terms of the technologies offered, diversification of the verticals served, and diversification of geographical penetration – if some of these would falter, the rest shall compensate. This flexibility and sustainability has been proven over the years in the face of various global, regional, and local crises, where Sirma and the products and services it offers, along with all other IT companies, have been seen not as victims but as solutions to the crises.

Sirma incorporates sustainability in its business strategy with "Economic sustainability" being a major emphasis. The remaining ESG topics are not considered by Sirma as cost-generating activities, rather a way to reduce risk and improve innovation and productivity:

E Producing its own solar electricity, Sirma reduces both its carbon footprint and the risk of energy shortages and/or spikes in energy prices;

S Caring for its employees and investing in their working conditions and skill sets only strengthen Sirma and motivate its workforce;

G Warranting transparency attracts investors, employees and partners who create the environment for success and reduces turnover rates.





Growth Drivers

A. Organic Growth and Market Expansion

Enhance Core Competencies:

- Invest in R&D with special focus on AI, machine learning, and other emerging technologies, ensuring that your product portfolio remains ahead of industry trends
- Expand our customer base in the established industry verticals with deeper relationship management and tailored solution offerings.
- Add other vertical expertise through acquisitions / partnerships with recognizable domain players.
- Become a player of significance in the near-east technology market.

Operational Excellence:

- Optimize internal operations with lean management, advanced analytics, and scalable IT infrastructure.
- Place an increased emphasis on talent acquisition, development, and retention to support growth and innovation.
- Introduce efficient AI techniques at all levels of delivery and management. Grow Sirma's enterprise AI core.

Outcome:

A stronger, self-sustaining core that not only prepares the business for scalable operations following acquisition activities but also builds intrinsic market momentum.

B. Strategic Acquisitions and Integration

Targeted Acquisition:

- Identify a future acquisition target with 100-150 FTEs and EUR 10-20M in revenue; ensure the target is highly active in AI technologies and aligns with the group's strategic vision.
- Use a robust due diligence process that evaluates cultural fit, technological compatibility, and synergy potential.

Integrated Roadmap:

- Cherry-pick synergies - realize the cross- and up-sell potential of the transaction. Smoothen team interactions and delivery.
- When ripe, establish a dedicated integration team with clear KPIs for merging operations, systems, and cultures.
- Plan for knowledge transfer and retention of key talent to ensure a seamless transition that accelerates market competence and revenue growth.

Outcome:

An enhanced portfolio of capabilities that strengthens our market position and provides the technological edge required to lead in the AI-driven market landscape.

C. Financial Strength and Capital Strategy

Dual Listing on FSE (2026):

- Strengthen governance frameworks and reporting processes to meet dual listing requirements, thereby enhancing investor confidence and liquidity.
- Engage in marketing activities to foster brand recognition and build trust in potential clients in the DACH region.

Capital Raise (End 2028):

- Organize a capital-raising round to secure EUR 50-100M, which will be allocated for additional acquisitions and fueling organic growth initiatives.
- Engage financial advisors and investment banks to ensure transparency, regulatory compliance, and the best market pricing.

Outcome:

A strong financial foundation that supports both organic advancements and inorganic growth, ensuring the company remains well-capitalized through each stage of its evolution.





Management System

Since 2015, "Sirma Group Holding" JSC has been a public company and is owned by its shareholders, who exercise full control over the company. The holding, in turn, owns a controlling stake (over 50%) of the capital of its subsidiaries.

The holding, as well as its subsidiaries, has a single-tier management system.

Operational control is delegated to the Board of Directors and, respectively, to the Executive Director. **The Board of Directors** of "Sirma Group Holding" JSC as of 31.12.2025 includes the following members:



Georgi Marinov
Chairman

Tsvetan Alexiev

Chavdar Dimitrov



Veselin Kirov

Atanas Kiryakov

Martin Paev



Yordan Nedev

Yavor Djonev

Peyo Popov

The ratio of independent members to the total number of members of the Board of Directors is 33%, and the entire Board composition is male. All members of the Board of Directors are highly qualified and competent to perform the tasks entrusted to them. Their qualifications have been reviewed and approved by the General Meeting of Shareholders when adopting the composition of the Board of Directors.

The mandate of the Board of Directors is set for 2 years from the date of registration. The mandate of the current Board of Directors expires in July 2026.

The Executives of Sirma are each focused on a specific field of corporate life as follows:



Tsvetan Alexiev
CEO and President

Yordan Nedev
CFO

Tsvetan Trenchev
COO



Momchill Zarev
CGO

Rumyana Stoykova
CCO

Tihomir Totev
CTO



Rosen Marinov
CPaO

Chavdar Dimitrov
Chief Talent Officer



The verticals of specialization are managed by the **Senior Vice Presidents (SVPs)** of Sirma as follows:



Tsvetomir Doskov
SVP Financial Industry



Galina Koleva
SVP Insurance



Darko Bosancic
SVP Travel & Hospitality



Rosen Marinov
SVP System Integration & BPO



Monika Ilieva
SVP Transport & Logistics



Momchill Zarev
SVP Cross-Industry Services



Dejan Nenov
SVP Healthcare



Nikolay Kondikov
SVP AI & Data Science



Georgi Marinov
SVP Manufacturing



Fabrice Gouttebroze
SVP ISU



Bodies to the Board of Directors

"Sirma Group Holding" JSC has established the following internal committees, which are assigned to manage the relevant activities at an operational level, as well as to propose decisions to the company's Board of Directors. As of 31.12.2025, their composition is:

Investment, Risk and Sustainability Committee composed of:

Yordan Nedev **CHAIRMAN**

Tsvetan Alexiev **MEMBER**
until 20.03.2024

Stanislav Tanushev **MEMBER**
after 20.03.2024

Georgi Marinov **MEMBER**

Remuneration Committee composed of:

Georgi Marinov **CHAIRMAN**

Martin Paev **MEMBER**

Yordan Nedev **MEMBER**

Audit Committee composed of:

Angel Kraychev **CHAIRMAN**

Alexander Kolev **MEMBER**

Veselin Kirov **MEMBER**

Disclosure Committee composed of:

Tsvetan Alexiev **CHAIRMAN**

Stanislav Tanushev **MEMBER**

Chavdar Dimitrov **MEMBER**

Atanas Kiryakov **MEMBER**

Partnerships and Certifications

Sirma strongly depends on its strategic upstream partners in order to provide state-of-the-art software and services to its clients.

Partnerships

Strategic partnerships with IBM, Apple, Oracle, Microsoft, Cisco, Lenovo, HPE, Oracle Financial Services (i-Flex), and Temenos

Sirma holds seven ISO certificates to demonstrate its commitment to quality, security and continuous improvement across all business areas. These certifications reflect the company's dedication to internationally recognized standards, ensuring reliable and efficient processes that enhance customer satisfaction. By maintaining multiple ISO standards, Sirma strengthens its competitive advantage, fosters trust with clients and partners, and supports sustainable growth. The certificates cover critical aspects such as quality management, information security, environmental responsibility, and service excellence. This holistic approach helps Sirma consistently deliver high-value solutions while complying with regulatory requirements and adapting to evolving industry best practices.

Sirma has the following ISO certificates:

ISO 9001:2015

Quality management systems

ISO 14001:2015

Environmental management systems

ISO 20000-1:2022

IT service management

ISO 27001:2022

Information security management system

ISO 27018:2019

Information technology. Security methods. Code of good practice for the protection of personal data in public clouds acting as data controllers

ISO 27701:2019

Guidance on the management of personal data in the context of information security management systems (ISMS)

ISO 22301:2019

Business continuity management systems



Management Remuneration

Sirma is a merit-based company. The compensation of the Board of Directors is closely linked to the results achieved – both financial and sustainability, as is described in detail in the Remuneration policy. Annually these are presented to the General shareholders meeting, which sets the annual remuneration (both fixed and variable) of the board members for the respective year.

Intra-company Documentation

The company applies a score of internal documents aimed at regulating the work, ensuring transparency, and preventing abuse. The majority of these documents apply to both the Holding and its subsidiaries. A small part (strictly specific or valid for the public company) concerns only “Sirma Group Holding” JSC.

Each of the internal documents is controlled by a member of the Board of Directors (detailed in the material topics below), who makes annual reviews of the results of the implementation, reports to the Board of Directors, and, if needed, makes necessary changes to the relevant document. A comprehensive list of the intra-company documents is provided in Annex 1.



Collaboration and Recognition

In order to further shared objectives, like digital transformation, the development of digital skills, or the encouragement of sustainable practices, **Sirma** collaborates with other businesses and organizations and takes part in a variety of trade associations. Through these involvements, Sirma actively shapes and influences legislation and policies that impact the company's operations, markets, and the larger IT sector. Sirma's active involvement in clean energy, industry advocacy, technology standards, business development networks, and digital transformation is reflected in these memberships:

Digital Transformation



Vzw Vil



Bulgarian Association of Software Companies (BASSCOM)

Sustainability and Compliance



Green Finance and Energy Center



Association of Bulgarian Investor Relations (ABIRD)



Bulgarian Procurement Association (BPA)

Business Organizations and Chambers



British-Bulgarian Chamber of Commerce



French-Bulgarian Trade and Industry Chamber



Bulgarian-Romanian Chamber of Commerce



American Chamber of Commerce in Bulgaria



Sirma's contribution to the IT industry, sustainability and society has been acknowledged by 30+ awards:



2025

Investor.bg

Stock of the Year



2024

PwC ESG Awards

Special Prize for Outstanding Corporate Sustainability Among Public Companies



2024

B2B Media Awards

Innovation in Talent Education



2024

B2B Media Awards

Excellence in Coaching



2024

Tech Elite Technology & Innovation Awards

Tech Growth Business of the Year



2024

Tech Elite Technology & Innovation Awards

Technology for Good



2023

Innovation in Talent Education

Annual Employer Branding Awards 2023, B2B Media Group (Sirma Solutions)



2023

Top B2B Companies - IT Services, Systems Integration and MS

Clutch Global Award winner 2023 (Sciant)



2023

European Public Sector Award (EPSA)

at National Information System of Medicinal Products (Sirma Solutions)



2018

Most Innovative Company

Bulgarian Chamber of Commerce and Industry Innovations Competition 2018 (Sirma AI)



2017

Start-up of the year

at the Innovation Technology & Sourcing Awards (Sirma Medical Systems)



2017

Innovative Enterprise of the Year

by Applied Research & Communication Fund (Ontotext)



2017

Top 10 Mobile Banking Solution Providers

by Banking CIO Outlook (Sirma Business Consulting)



2017

Best App for Healthy Living and Eating

at Webit Festival Europe 2017 (Sirma Medical Systems / Diabetes:M)



2016

Top ICT Employer

by ICT Media (Sirma Business Consulting)



2016

Best IR Campaign

by the Association of Investor Relations Directors (Sirma Group Holding)



2015

Two Best of show awards at CES 2015

for Energeous (NASDAQ:WATT) embeddedcloud-mobile IoT infrastructure (Panaton)



2015

Loyalty 360 Awards

Galleria Loyalty Club Top 6 Loyalty Programs Worldwide (Sirma Solutions/LOYAX)



2014

Top ICT Employer

by ICT Media (Sirma Business Consulting)



2014

Best Entity Extraction

at BBC III News Hack Awards (Ontotext)



2014

Innovative Enterprise of the Year

by Applied Research & Communication Fund (Ontotext)



2013

Forbes Bulgaria Business Awards 2013

Business Development (Sirma Solutions/mSmartCast)



2012

Forbes Business Awards Bulgaria 2012

Business Development (Sirma Solutions/LOYAX)



2011

Best Mobile Internet Security Award

SIMagine Awards for SIM Toolkit Forbes Business Awards Bulgaria 2012, (Sirma Mobile)



2010

Pithagoras Award

for the most outstanding and successful company in the 6-th EU Framework Program (Ontotext)



2010

Comenius EduMedia

prize for didactic media products – Electronic encyclopedia "History of Bulgaria" (Sirma Media)



2008

Bulgarian Superbrands Award

Sirma Solutions



2007

Bulgarian Superbrands Award

Sirma Solutions



2005

The Best of Show Awards

External Dynamic Routing (EyeBill Interactive)



2004

Bulgarian IT Innovation Award

Vulcan C4I system (Sirma Solutions)



2002

Euroawards New Startup Ventures

EyeBill Multi-Services Billing Platform (EyeBill Interactive)



2000

GTEC (Government in Technology) Product Innovation Award

WorkLogic, Canada



In 2023–2024, the Bulgarian Stock Exchange introduced the LSEG ESG rating framework for listed companies, providing an important benchmark for sustainable business practices. The year 2024 was the first reporting period during which companies had the opportunity to be evaluated, and Sirma became the first to successfully complete this assessment, setting a precedent for ESG reporting in the local market and demonstrating its commitment to transparency.

Following the initial pilot, the partnership of Bulgarian Stock Exchange with LSEG was not renewed for year 2025. Sirma is currently pursuing a new ESG rating, aligning this effort with its Frankfurt Stock Exchange listing, reflecting its ongoing dedication to robust sustainability practices and investor transparency.



Sustainability Management

Board of Directors

Incentive schemes and remuneration policies related to sustainability issues have been established for the members of the Board of Directors of Sirma. The [Remuneration Policy for the Board of Directors](#) (adopted by the General Meeting of Shareholders of Sirma) defines among the criteria for payment of variable remuneration to the members of the Board of Directors:

Setting annual targets on sustainability topics and monitoring their implementation;

Imposing high standards of corporate governance;

Integrating corporate social responsibility into the daily management practice of the company;

Stable and sustainable development of the company in economic, social, and environmental aspects;

Compliance with applicable rules and procedures;

Promoting cooperation with stakeholders.

Non-financial criteria for achieved results are determined annually by the Board of Directors of "Sirma Group Holding" JSC, in accordance with the short-term and medium-term development plans of the company. The assessment of the implementation of the non-financial criteria for achieved results is carried out annually, based on an analysis of the results achieved according to the non-financial criteria set for the previous year (text according to Art. 13 of the Remuneration Policy).

Reporting on the remuneration paid out to the members of the Board of Directors is carried out before, and adopted by, the General Meeting of Shareholders annually.

Sustainability Director

In 2024, a new management position was created – Director Sustainability, to focus and coordinate all of Sirma's activities in the area of sustainability and ESG, achieving full compliance with the relevant legal framework, monitoring progress, setting and implementing goals, strategies, and governance. Mr. Stanislav Tanushev was elected as Sirma's first Director of Sustainability.



"Sirma has always maintained sustainable practices. For the most part, these practices have been fully justified by business logic. What is new, however, is the measurement of their results and the disclosure of what has been achieved."

Stanislav Tanushev

*Investor Relations and Sustainability Director,
Sirma Group Holding JSC*



Sustainability Committee

Since 2024 the "Risk, Investment and Sustainability Committee" (Sustainability Committee for brevity in this document) is managing all of Sirma's sustainability efforts, analyzes the impact, risks, and opportunities of sustainability-related topics. The Sustainability Committee reports to the Board of Directors. Its mandate was accordingly published on the company's website in the Governance section. The Sustainability Director is a member of the committee. The Chairman of the Committee remains Sirma's CFO, thus ensuring good coordination between sustainability, risk management, and investments. The third member of the Committee is the Chairman of the Board of Directors of "Sirma Group Holding" JSC, which contributes to the excellent coordination of the activities of the Committee and the Board.

CSRD competence

The volume of new regulatory requirements related to CSRD is significant. In parallel, the reporting requirements are new for the entire European Union, and good examples are lacking. To meet these challenges, the Sustainability Committee has taken steps to ensure the necessary competence, as follows:

The Sustainability Director has successfully completed the Sustainability & ESG Introductory Course of the Exponential Education Institute and

A contract has been concluded with a specialized consulting company to obtain specific knowledge from the Sustainability Committee and assist in achieving compliance with the new regulatory requirements and preparing Sirma's first Sustainability Report.

These measures have yielded the necessary result, culminating in the current Sustainability Report.

Sustainability Ambassadors

The CSRD and ESRS requirements necessitate the involvement of many of Sirma's employees and managers in the process of collecting ESG information, its analysis, and reporting. All ESG initiatives usually involve many of Sirma's team. Thus, the Risk, Investment and Sustainability Committee coined the title "Sustainability Ambassador" to recognize the most important and active participants in Sirma's ESG efforts. Some of the Sustainability Ambassadors are such due to their official positions (e.g., HR Director, Chief Accountant, etc.). Other Ambassadors are such due to their own desire and conviction (e.g., Chief Graphic Designer). In both cases, the Ambassadors contribute both to explaining sustainability topics among employees and to collecting data, setting goals, and monitoring their implementation.

Sustainability Ambassadors include, but are not limited to:

- The Chief Accountants of all Sirma companies
- HR Director
- Marketing Director
- PR Manager
- Head of Sirma Academy
- Chief Graphic Designer
- Employee engagement expert
- Facility Manager





Materiality of the Sustainability Topics

The Materiality Analysis Methodology was developed in 2024, and the first due diligence review of sustainability-related topics for Sirma was conducted in accordance with ESRS requirements. The methodology provides for an annual review of materiality in line with changes in Sirma's priorities and the surrounding environment. The analysis conducted in 2025 reflected the changes that have occurred, which are described below.

Due Diligence Process

Definitions

Through its operations, Sirma impacts the environment and communities across various sustainability issues. At the same time, these sustainability issues have a financial impact on Sirma's operations, presenting both risks and opportunities. Topics that are material in terms of either impacts or financial implications, or both (double materiality), are identified as the company's material environmental, social, and governance (ESG) issues. A sustainability topic is material in terms of impact when it has actual or potential, positive or negative, significant influence on people or the environment in the short, medium, or long term. The impact is considered both from the Company's own

operations and from operations up and down the value chain to the first level (organizations directly affected by, or affecting Sirma). The materiality of the impact is measured by the likelihood of occurrence, the severity, and the scope of the negative impacts—the ability to mitigate the negative consequences.

On the other hand, a sustainability issue is material from a financial perspective if it causes or can reasonably be expected to cause material financial effects on the Company. This is the case when the sustainability topic generates risks or opportunities that have a material impact or can reasonably be expected to have a material impact on Sirma's development, financial condition, financial results, cash flows, access to financing, or cost of capital in the short, medium-term, or long-term. Again, the financial impact, or the risks and opportunities, are not limited to the scope of Sirma's operations but also encompass the Company's interactions throughout its value chain. The materiality of risks and opportunities is assessed based on a combination of the probability of occurrence and the potential magnitude of the financial impact on Sirma.

Due diligence regarding the materiality of impacts, risks, and opportunities arising from or related to Sirma's operations is the process through which actual and potential negative or positive impacts, risks, and opportunities on the environment and people are identified, prevented, mitigated, and accounted for. These include impacts related to the Company's own operations and its upstream and downstream value chain, including through its products or services, as well as through its business relationships.

Stages of the Due Diligence

Sirma's sustainability due diligence and dual materiality assessment process consists of the following main stages:

identification of stakeholders and their engagement;

analysis of all ESG topics according to ESRS and determination of those not applicable to Sirma;

justification of the reasons for excluding certain topics;

definition of the risk assessment methodology;

identification and analysis of applicable topics for Sirma - impact, risks, and opportunities;

assessment of the impact, risks, and opportunities of each applicable topic;

ranking of applicable topics and determination of those with dual materiality;

preparation of a dual materiality matrix;

definition of indicators for measuring material topics;

collection and analysis of data on the indicators of material topics;

verification of "Eligibility" and "Compliance" of Sirma's activities.

The due diligence methodology is documented in detail.

Applicable Topics

Not all topics proposed by the ESRS are applicable to Sirma and its operations. The topics and their subtopics that are applicable to Sirma were identified by the Sustainability Committee. The full list of sustainability topics, subtopics, and sub-subtopics (according to the ESRS) was analyzed by the Investment, Risk, and Sustainability Committee. Each topic was simultaneously assessed to determine whether:

Sirma's activities have a significant impact on the elements of the relevant topic (e.g., carbon emissions, impact on society) and whether

it carries risks and/or opportunities (e.g., operational, financial, reputational) for Sirma's activities.

To assess both the impact and the risks and opportunities, a 5-point scoring system was used, which Sirma employs in its [Risk Management Policy](#).



Stakeholders

Stakeholders are those individuals and organizations that can influence or be affected by Sirma's operations (marked in blue in the double materiality matrix below) or by its sustainability reports (marked in red in the chart below), both positively and negatively. Some stakeholders are affected by both Sirma's operations and its reports (marked in green in the stakeholder matrix below).

Identification of Stakeholders

Sirma is a B2B company. Its IT products, solutions, and services are sold primarily to other businesses. To do this, Sirma uses its internal capacity as well as external suppliers (e.g., Oracle, Temenos, Microsoft, hardware suppliers, etc.). Sirma's products are sold to its customers. They, in turn, use them to facilitate their own internal processes or to serve their "end users".

The process map to the right outlines the 7 main operational stakeholders in Sirma. However, there are also 4 additional stakeholder groups that are both affected by and have an impact on the company's operations: regulators, the environment, communities, and potential investors.

This comprehensive list of stakeholders was determined after an analysis by Sirma's Investment, Risk, and Sustainability Committee, listed in descending order of their impact:



- **Management** (operations)
- **Shareholders** (operations and reporting)
- **Employees** (operations)
- **Banks and other creditors** (reports)
- **Customers** (operations)
- **Suppliers** (operations)
- **Environment** (operations and reporting)
- **Regulators** (reports)
- **Communities where Sirma operates** (operations)
- **End-users of products and services produced by Sirma** (operations)
- **Potential investors** (reports)

Stakeholder Research and Engagement

Every year, Sirma conducts a survey that covers all stakeholders. In addition to this main survey, the Company also conducts a number of surveys targeting specific stakeholder groups: employee satisfaction surveys, customer satisfaction surveys, and others. The results of these surveys help determine the impact and influence of each group throughout the year.

Sirma's Stakeholder Matrix

Different groups of stakeholders have different influences on Sirma's activities and are themselves influenced in different ways by these activities. The stakeholder survey identifies and enables graphical expression.

The result of the stakeholder survey is as follows:





2024/2025 Dynamic

There has been a significant change compared to the same survey from 2024 in the positioning of “Potential Investors” and “Regulators.” The influence of both groups has grown significantly in 2025.

The main reason for both significant shifts is the dual listing of Sirma’s shares in Frankfurt. The listing of the company’s shares on a significantly larger market (approximately 100 times larger in terms of trading volume compared to the BSE) has led to a sharp increase in the number of potential investors and, consequently, in their importance to Sirma.

The influence of “Regulators” has also grown significantly over Sirma. The company must now comply with the rules and requirements of the German market and, consequently, those of German regulators.

The significant increase in the importance of these two stakeholder groups was anticipated, with preparations for this taking place in the second half of 2025. In late 2025 and early 2026, Sirma launched a massive marketing campaign outside Bulgaria with one primary goal: to familiarize “potential investors” with the Company’s business model, operations, and results. At the same time, all necessary measures were taken so that, at the time of the Company’s stock listing on the Frankfurt Stock Exchange, Sirma was fully compliant with the requirements of that market and its regulators.

Sirma adopts the three-tiered approach established in the Company’s Risk Management Policy, including here in the grouping of various stakeholders. Accordingly, the weight of each stakeholder group is graphically divided into three segments, with only

values above 3.33 (the top third) being considered to represent significant influence or interest.

Engaging and Mapping Stakeholders

The Sustainability Team engages with stakeholders through explanatory content, surveys, interviews, and workshops to collect qualitative and quantitative data on sustainability topics (Sirma’s stakeholder mapping is a prime example of this approach). Stakeholders are often asked to identify all of Sirma’s significant impacts and the risks and opportunities the Group faces related to sustainability.

This information simultaneously:

helps prioritize issues based on their importance, both to the business and to stakeholders

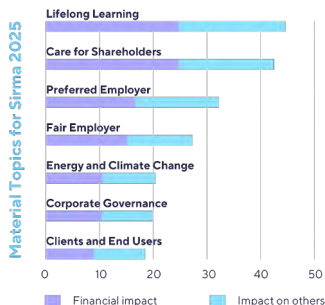
Increases stakeholders’ knowledge and awareness of sustainability issues and the steps Sirma is taking in this direction.

Sustainability Topics that are Material for Sirma

After conducting a thorough review of the sustainability topics, each one is assessed. For each individual topic, the higher value of the assessment of its risks and opportunities is taken into account when determining its financial impact.

A sustainability issue is considered double-material when its score under the scoring system exceeds 15 points (again, the three-tier approach from the “Risk Management Policy” is applied, and the top 33%, or 1/3 of the maximum sum of impacts, is considered). These topics should be reported on, monitored, and, where possible, managed.

The material topics for Sirma in 2025 are seven: **Lifelong Learning, Shareholder Care, Preferred and Fair Employer, Energy and Climate Change, Governance, and Customers**—in that order.



The following double materiality topics for the Group’s sustainable development, ecology, and society were identified:

Social sustainability

- **Lifelong learning**
- **Preferred employer**
- **Fair employer**
- **Client and end-user care**

Environmental sustainability

- **Energy and climate change**

Governance sustainability

- **Shareholder care**
- **Corporate governance, values, and dialogue**

Each material topic consolidates several material sub-topics, which will be discussed below.





Social Impact of Sirma's Activity

"People are the heart and the driving force of Sirma Group. It is their talent, curiosity, and dedication that turn our ambitions into tangible results. When we invest in the knowledge, motivation, and well-being of our teams, we build an environment where innovation happens naturally and success is sustainable. Confident and inspired professionals create value—both for the company and for the clients whom we help every day to digitize, grow, and succeed."

Chavdar Dimitrov
Chief Talent Officer,
Sirma Group Holding JSC



Social Highlights

The most significant topics, and those with the highest scores, are found in the social category. At Sirma Group Holding, social topics encompass the ways in which the company creates value through its people, customers, and the communities in which it operates. These include responsible labor practices, equal opportunities and inclusion, health and safety, skills development, and lifelong learning.

The focus is on building an engaging work environment that supports motivation, well-being, and ethical workplace relationships. The focus is also on the protection of human rights, constructive dialogue with stakeholders, and high-quality customer service. Through investments in knowledge, leadership, and internal academic initiatives, Sirma promotes innovation and sustainable employment.

Social issues are integrated into corporate governance and the sustainability strategy and are viewed as a key factor for long-term competitiveness, investor confidence, and a positive impact on society. This approach aligns with international standards for sustainable development and supports transparency, accountability, and the group's responsible growth within a global, technological, and social context, fostering a sustainable business model.

Main Social KPIs

Social KPIs

2025

Who We Are – the Demographics

Nationalities within Sirma	9
Average number of employees and managers in 2025	826
Incl. average external employees	62 (8%)
Incl. part time employees	9 (1%)
Incl. managers	14
Incl. average full time employees	755
Split men/women – average for the year	64% / 36%
Share of employees with disabilities	2%
Employees up to 30 years of age (% of total)	25%
Employees age between 30 and 50 (% of total)	52%
Employees age above 50 (% of total)	23%
Average age of the employees of Sirma	34 years
Average tenor in Sirma	7 years
New employees during the year – men	76 (67%)
New employees during the year – women	37 (33%)
Employees who left – men	66 (62%)
Employees who left – women	40 (38%)

Additional indicators are published under the relevant topics below.



The due diligence process places social issues related to sustainability at the forefront of the material topics. Four of the seven material topics are socially oriented. Three of these relate to the employee stakeholder group, and one relates to the customer and end-user stakeholder group. Here is a brief description of each topic and its included subtopics, the identified impacts, risks, and opportunities, the relevant indicators for measuring and monitoring each one, and the actions taken and results achieved during 2025:

Lifelong Learning

Lifelong learning is a key element of Sirma's social strategy and a major factor in the sustainability of its business model within the dynamic environment of the IT sector. The company views the continuous development of employees' knowledge, skills, and competencies as a strategic investment in service quality, innovation, and long-term competitiveness.

In accordance with ESR5 S1 – Own Workforce, Sirma applies a systematic approach to training, encompassing skills planning, individual development, formal and informal training, and adaptation to technological and market changes. Through targeted investments in training and via "Sirma Academy," the company creates a sustainable environment for professional and personal growth. Lifelong learning supports employee engagement, the management of risks associated with skills shortages, and the creation of added value for customers and society.

This topic has always received significant attention (and recognition) at Sirma. In 2025, its importance rose to become a top priority for the Group.

Sirma has been developing AI-based solutions since its inception. However, in 2025, this expertise became critical. The application of artificial intelligence in Sirma's products and services became a competitive advantage for the Group. In this context, engaging the entire Sirma team in the application of artificial intelligence in daily work and innovation became essential. The elements of the "Lifelong Learning" topic were mobilized to develop AI skills among every employee in the company. Moreover—as in previous years—Sirma Academy ensured that this knowledge was disseminated to the public through its courses, webinars, and podcasts. Consequently, the materiality of this topic took on leading importance for the Group, receiving the highest score among material topics in 2025 at 45 points.

The topic has two sub-topics: "Training and Upskilling" and "Sirma Academy," which are closely linked.

Skills management and development at Sirma Group Holding is a planned and systematic process for building professional, technical, and managerial competencies in line with the company's strategic goals.

Training and professional development at Sirma encompass a wide range of formal and informal educational initiatives—internal programs, external courses, certification training, and specialized technical and soft skills. In accordance with ESR5 S1-2, S1-4, and S1-6, the company encourages active dialogue with employees and provides access to training throughout their professional careers. "Sirma Academy" plays a central role, systematizing knowledge, supporting innovation, and contributing to the sustainable development of human capital, including through training for external participants.

Systematic training and upskilling help employees adapt to rapidly evolving technologies and strengthen the group's internal capacity.

Impact, Risks and Opportunities

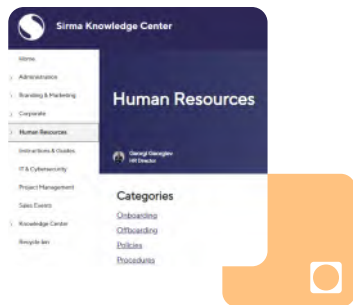
The topic of "Lifelong Learning" is doubly material to Sirma, with the financial impact on the Company carrying slightly more weight. Ensuring the continuous maintenance and improvement of professional qualifications for all employees, creating opportunities for career development and increasing compensation has a positive impact on Sirma's employees (the impact received 20 points in 2025). At the same time, the financial impact during the year reached the maximum of 25 points. The main reason for this was the widespread adoption of artificial intelligence in IT products and services globally. This significantly increased the risks of employees' knowledge and skills falling behind rapid technological and market advancements, leading to a loss of competitiveness, market share, and customers. At the same time, the AI revolution also created many opportunities to strengthen market position by offering high-value IT services and solutions based specifically on AI and supporting the company's clients in applying artificial intelligence in practice within their operations.

Since the beginning of the year, the topic of "Lifelong Learning" has been developed and enriched with new content, specifically addressing the risks and opportunities dictated by AI adoption through the development of all employees' knowledge base.

Actions taken in 2025

The materiality (impact and influence) of the topic "Lifelong Learning" was underscored not only through analysis but also by the numerous initiatives and achievements in 2025. The actions taken were focused on two areas: the development of the "Internal Training Ecosystem" and "Sirma Academy."





Internal Training Ecosystem

The first step in 2025 regarding the topic of “Lifelong Learning” was ensuring free access for every employee to Sirma’s knowledge library. The internal learning ecosystem “**Sirma Knowledge Center**” was completed and became operational in early 2025. Sirma Knowledge Center is a centralized repository of key organizational information and knowledge. It provides employees with quick access to up-to-date answers to frequently asked questions and a wide range of important documents, while simultaneously reducing risks related to security, compliance, and lack of transparency. By storing all relevant information in one place, duplication and manual document sharing are avoided, ensuring that employees use a single, up-to-date version created by authorized personnel.

The Knowledge Center serves as the foundation for future solutions in artificial intelligence and business process automation. Its content and structure serve as a high-quality **source for training AI models and contextual management**. Its primary objectives are to enhance transparency, foster a shared vision, ensure effective information management, improve operational efficiency, and mitigate risks. The portal covers documents related to vision and brand, strategy and management, risk and compliance, HR and operations, unit-specific assets, and corporate training. Through the Sirma Knowledge Center, artificial intelligence has been applied not only in educational programs but also in the Company’s daily corporate work and training.

Sirma Academy

2025 was a year of growth, modernization, and AI transformation for Sirma Academy. The Academy established itself not only as a training center but also as a strategic tool for developing people, knowledge, and future talent for the group.



Sirma Academy in 2025

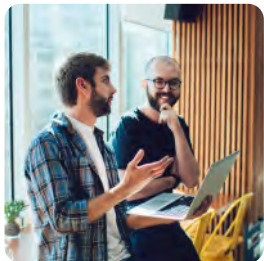
Action Category	Actions Taken and Results Achieved in 2025
External training	<p>3,500+ external trainees enrolled in various training courses and programs +185% growth compared to 2024</p> <ul style="list-style-type: none"> • Training conducted in the following areas: Software Engineering, AI, QA, Digital Skills, and specialized corporate programs that we launched both internally and for external partners. • Expanded portfolio with new AI training courses aimed at both beginners and professionals
Internal training	<ul style="list-style-type: none"> • 500+ employee participations in internal training sessions, workshops, and learning initiatives • Topics: AI adoption, development skills, automation • Support for internal transformation and upskilling within the group
Updating training content	<p>Updating and expanding curricula with a focus on artificial intelligence, new technologies, and practical skills, in line with market and business needs. Introducing and developing practical AI programs (AI Foundation, Practical AI) aimed at both IT and non-IT professionals.</p>
Programs with the highest interest in 2025	<ul style="list-style-type: none"> • AI Foundation – Practical AI • AI First Development • HTML & CSS Foundation • SQL Foundation • JavaScript Track • Practical AI Workshops
Accessibility and Flexibility of Training	<ul style="list-style-type: none"> • Use of online, hybrid, and asynchronous formats, including recorded lectures, live streams, webinars, and podcasts. • Investment in our own podcast studio
Practical focus and measurability	<p>Introduction of practical assignments, projects, and exams to assess knowledge retention and improve the effectiveness of training.</p>
Development of internal expert capacity	<p>Establishing and utilizing an internal network of lecturers and experts from the group to share knowledge and best practices.</p>
External outreach and monetization	<p>Offering training, certification programs, and exams to external participants, partners, and clients through “Sirma Academy.”</p> <ul style="list-style-type: none"> • Training sessions conducted for external companies and partners • New focus on AI upskilling for business teams • Customized programs tailored to client needs
Knowledge Dissemination and Reputation	<p>Creating and sharing educational content through social media and digital channels to increase visibility and reputation.</p>



"Lifelong learning" yielded tangible business results in 2025. Artificial intelligence was integrated into both the Company's day-to-day operations and its product portfolio. During the year, the [Sirma AI Enterprise](#) platform was rolled out across all of Sirma's verticals of specialization. This initiative contributed to Sirma's competitiveness and helped improve customer service (see the dedicated section below).

Lifelong Learning KPIs

Sirma monitors and manages the "Lifelong Learning" topic through indicators related to investment in training, access to training, and training outcomes. Throughout the year, all measured indicators showed a measurable increase compared to 2024, reflecting the growing importance of this topic:



Lifelong Learning KPIs	2025
Expenses for training through the year	EUR 177,500 (25% growth)
Employees who attended courses, seminars and symposiums during the year (other than those organized by Sirma Academy), with some visiting more than one	1,322 (30% growth)
Employees who attended Sirma Academy courses during the year	EUR 85,000
External students at Sirma Academy during the year	512 (51% growth)
Views of Sirma Academy's YouTube channel during the year	3,517
Hours of viewing on Sirma Academy's YouTube channel during the year	17,400

Targets for Lifelong Learning in 2026

Strategic Direction	2026 Target	Metric / KPI	Scope
Average training levels	Increase the average number of training hours per employee	≥ 40 hours of training per employee per year	All employees
Training coverage	Ensuring access to structured training	≥ 90% of employees with at least one training session per year	All employees
Sirma Academy	Expanding the role of the internal academy	≥ 60% of all training conducted through Sirma Academy	Group level
Professional certifications	Encouraging certification	≥ 20% increase in employees with valid professional certification	Target roles
Leadership capacity	Systematic development of managers	100% of managers have completed at least one leadership training course	Management
Career development	Link between training and development	≥ 70% of employees have an updated individual development plan	All employees
Comitment to learning	Promoting a culture of learning	≥ 80% positive feedback on training	All participants



Preferred Employer

"In 2025, Sirma organized more than 35 targeted events and initiatives focused on employee engagement. These activities are part of the company's systematic approach to human capital management and aim to foster an inclusive and engaging organizational culture that supports employee well-being, strengthens a sense of belonging, and contributes to the Group's sustainable development and corporate identity."

Ivona Boneva

Employee Engagement Expert



ESRS mapping:

ESRS S1 – Own workforce

The "Preferred Employer" topic reflects Sirma's strategic approach to human capital management and builds upon the principles of legality and fairness established in the "Fair Employer" topic. It is **doubly material** for Sirma with an almost equal score in 2025 between impact on employees and financial relevance for the Company (total score of 32 points).

The topic "Preferred Employer" reflects the long-term strategic commitment of **Sirma Group Holding** to creating a secure, inclusive, motivating, and developmental work environment that attracts, engages, and retains highly qualified professionals in the highly competitive and dynamically evolving IT sector. The company views its employees as a key strategic resource and places their well-being, development, and engagement at the core of the sustainable implementation of its corporate strategy.

In accordance with the requirements of **ESRS S1**, Sirma applies an integrated and systematic approach to managing its workforce, based on clearly defined policies, measurable indicators, and active dialogue with employees. This topic encompasses flexible forms of employment and measures for work-life balance, opportunities for professional and career development, inclusion and equal access to employment, promotion of diversity, as well as the provision of competitive compensation and additional motivational benefits.

In **2025, the "Preferred Employer" topic remains among the top priorities for Sirma**, with its importance growing in the context of increasing competition for talent, employees' heightened expectations regarding flexibility, fulfilling work, and development, as well as accelerated technological transformations in the sector and the rapid adoption of AI.

The company consistently implements policies for remote and hybrid work and provides opportunities for family-related leave, which are integrated into HR processes and systematically tracked. The systematic approach to employee development is implemented through **360-degree evaluations** conducted twice a year and through targeted investments in training and upskilling. In parallel, Sirma implements active policies to prevent discrimination, promote the inclusion of people of different nationalities and people with disabilities, and encourage gender and age diversity.

Through competitive compensation, additional social benefits, bonus schemes, and regular engagement surveys, the "Preferred Employer" topic contributes to high satisfaction, lower turnover risk, and sustainable

human capital development, creating long-term value for employees, customers, and society.

Impact, Risks and Opportunities

The "Preferred Employer" topic has a **significant positive impact** on employees, organizational culture, and the long-term sustainability of **Sirma**. By providing flexible work models, opportunities for professional development, an inclusive work environment, and competitive compensation, Sirma increases employee engagement, satisfaction, and retention. This leads to higher productivity, stronger innovation capacity, and the creation of long-term value for customers and society.

The main **risks** associated with this topic stem from increased competition for IT talent, rapid technological changes, and rising employee expectations regarding flexibility, development, and well-being. Insufficiently effective policies for engagement, development, or inclusion could lead to increased turnover, loss of key experts, and reputational risks for Sirma as an employer.

At the same time, this topic presents **significant opportunities** for the Group. Through the consistent development of its **Employer Value Proposition**, the integration of training and career development (including through Sirma Academy), and an active policy on diversity and equal access to employment, Sirma is strengthening its position as an employer of choice. This supports sustainable growth, improves the ability to attract new talent, and reduces long-term risks associated with skills shortages.



Actions Taken in 2025



Flexible work models and work-life balance measures introduced and consistently implemented

In 2025, Sirma consistently implements policies for remote and hybrid work, as well as family leave options for all employees. These measures are integrated into HR processes and tracked through metrics related to leave usage and working from home, with the aim of providing real support for work-life balance.



A guaranteed systematic approach to professional development through 360° evaluations and training

Sirma conducts 360-degree employee evaluations twice a year, which serve as a basis for identifying development needs and planning career paths. This approach is supported by active investments in training and upskilling, including through internal and external programs.



Active policy on inclusion, diversity, and equal access to employment

Sirma implements anti-discrimination policies and actively promotes the inclusion of employees of different nationalities and people with disabilities. In 2025, the company launched its "onboarding" system, which includes an Onboarding Policy, Onboarding Procedure, mentoring programs, and technical support from the Sirma Knowledge Center.



Maintaining competitive compensation, additional benefits, and high engagement

Sirma uses various measures to further motivate its employees:

- **bonuses** for a job well done
- supplementary **health insurance** for all employees
- various motivational **events** and **meetings**
- free physical and recreational **activities**
- an excellent **work environment**

These additional motivational initiatives ensure high employee engagement with both their individual operational tasks and a sense of ownership regarding Sirma's overall objectives. Employee satisfaction and engagement are tracked through regular internal surveys, which reinforce Sirma's position as a preferred employer.



Results 2025

The actions taken in 2025 under the "Preferred Employer" topic have yielded results. In a survey conducted among all employees at the end of the year, respondents indicated that:

Results for Preferred Employer - employees: 2025

feel that their direct supervisor values their work	81%
feel motivated and satisfied with their work	75%
have good or excellent work-life balance	64%
consider that Sirma offers opportunities for career development	72%
think that their team works well together to achieve common goals	87%





Preferred Employer KPI

Preferred Employer KPIs	2025
Average monthly salary in EUR as of 12/31 for men	EUR 3,619
Average monthly salary in EUR as of 12/31 for women	EUR 3,000
Difference in average monthly salary between men and women	≈19%
Level of average wages in Sirma relative to the <u>IT sector average</u>	+33%
Employees who have undergone attestations at least once a year	100%
Increase in the average monthly salary during the year	27.9%
Number of family/maternity leaves	154
Employees with a right to remote work	92%
Number of days of remote work	9,982
Expenses for employee engagement	EUR 245,000
Employees with additional health insurance	76%

Preferred Employer Goals for 2026

Strategic Direction	2026 Target	Metric / KPI	Scope
Pay disparity	Analyze causes and reduce pay disparity between men and women	Reduction of disparity	All employees
Compensation	Countering inflation	Real wage growth of up to 5%	All employees
Additional incentives	Standardization of additional incentives across all offices	100% employee coverage	Group level
Development	Improvement of career development opportunities	≥ 65% satisfaction	All employees
Work-life balance	Improving work-life balance	≥ 70% satisfaction	All employees



Fair Employer

At Sirma, the management of the social indicators described in **ESRS S1 – Own Workforce** is integrated into the company's efforts to be a "Fair Employer."

The "Fair Employer" topic reflects Sirma's commitment to applying responsible, lawful, and ethical practices in the management of its own workforce, in full compliance with the requirements of European and Bulgarian labor legislation and the applicable ESRS (S1) standards. At the heart of this topic lies the conviction that sustainable business results are directly linked to respect for labor rights, transparent management processes, adequate compensation, and the provision of a healthy and safe work environment.

As a fair employer, Sirma ensures that all employees work under lawful employment or management contracts, with clearly defined working hours, the right to leave, and predictable, timely, and non-discriminatory compensation. The company implements transparent policies and procedures, provides clear job descriptions, and offers systematic feedback through annual performance reviews, thereby supporting employee development and engagement.

Sirma ensures fairness in pay, linked to individual contribution and results, and actively works to reduce gender pay gaps. Particular importance is placed on occupational health and safety through compliance with regulatory requirements and regular preventive medical examinations. Through these policies, processes, and performance indicators, Sirma reinforces its role as a responsible and fair employer.





Impact, Risks, and Opportunities of Fair Employer

The "Fair Employer" topic has a direct and systematic **impact** on legal certainty, internal trust, and the social sustainability of employees at Sirma Group Holding. Strict compliance with labor legislation, the guarantee of labor rights, transparent management practices, and the assurance of health and safety at work create a stable and predictable work environment. This reduces the risk of workplace accidents, disputes, penalties, and internal tensions, while simultaneously fostering a culture of fairness, and accountability. In the long term, this topic contributes to the Group's institutional sustainability and to the trust of employees, regulators, and investors.

The main **risks** related to the "Fair Employer" topic are associated with potential gaps in the implementation or enforcement of labor laws, insufficient transparency in processes, or inconsistent application of policies across different companies and teams. Such weaknesses could lead to workplace accidents, administrative sanctions, financial costs, reputational damage, and a deterioration of the social climate within the organization. This, in turn, would result in reduced competitiveness, loss of customers, and direct financial losses. An additional risk is posed by the growing EU regulatory requirements, including those under the CSRD and ESRs, which demand a higher degree of formalization, traceability, and accountability.

At the same time, this issue presents significant **opportunities** for Sirma. By systematizing policies, clearly defined processes, measurable indicators, and effective control mechanisms, the Group can improve management quality and reduce long-term health,

legal, and operational risks. Sirma's consistent establishment as a fair and law-abiding employer strengthens its corporate reputation, supports access to capital, and creates a stable foundation for sustainable growth.

Actions Taken Under the Fair Employer Initiative in 2025

The actions taken in 2025 under the "Fair Employer" topic are aimed at addressing the identified risks through more effective management, as well as at realizing the identified opportunities through their consistent implementation.



Digitization of labor-law processes through electronic personnel files

In 2025, Sirma actively implements and uses electronic personnel files (via the sHRedy platform), ensuring full compliance with the Labor Code, eIDAS, and personal data protection requirements. The solution enables the lawful signing, storage, and management of employment contracts, addenda, orders, and leave requests, thereby reducing administrative risk and enhancing legal certainty for employees.



Maintenance and implementation of a unified Internal Labor Regulations for the Group

Sirma implements an updated Internal Labor Regulations manual, valid for all companies within the Group, which clearly regulates employment relationships, working hours, leave, disciplinary responsibility, and occupational health and safety. This ensures consistent and non-discriminatory treatment of employees throughout the Group structure.



Ensuring health and safety through mandatory and supplementary health measures and optimal working conditions

In 2025, Sirma continues to provide mandatory preventive medical examinations for its employees, in accordance with legal requirements for healthy and safe working conditions. In parallel with preventive health care, Sirma ensures optimal, comfortable, and safe working conditions, which are verified by external auditing organizations.



Ensuring transparency in labor relations

In 2025 Sirma launched its digital platform, the Sirma Knowledge Center. One of the platform's modules provides employees with access to all internal regulations within the company governing labor relations, secure information handling, whistleblowing, anti-corruption measures, and workplace ethics.

Fair Employer KPIs

The results of the actions taken under the "Fair Employer" initiative were excellent during the year.

Fair Employer KPIs	2025
Number of sick leaves	233
Employees who have undergone an annual health check-up	89%
Number of work accidents during the year	0
Employee complaints during the year	0
Employee satisfaction from working conditions	77%
Employees with electronic working/management contracts	100%
Employees with job descriptions	100%
Employees with social security contracts	100%
Employees with health assurance	100%
Average tenor in Sirma	7 years



Fair Employer Goals for 2026

Maintaining full compliance with labor laws and ensuring that 100% of employees have valid digital employment, civil, and administrative contracts;

Maintaining transparency in labor relations and 100% access to the Group's internal documents, with 100% of employees having job descriptions, health, and social insurance coverage;

Maintaining the highest standards for working conditions and achieving an employee satisfaction rating above 80%

Improving employee coverage of annual health checkups—over 90%

Maintaining or increasing the average tenure of Sirma employees to 7 years



Clients and End Users

ESRS G1 – Business Conduct (Data Ethics, Compliance)

ESRS S4 – Customers and End Users – Digital Inclusion

- **S4-1:** Policies related to data protection and privacy
- **S4-2:** Processes to prevent impacts on consumers
- **S4-4:** Innovations impacting end users

ESRS E1 (indirect link) through digital efficiency effects

The "Clients and End Users" is the most significant topic for Sirma. Customers and end users are the company's *raison d'être*. This is the topic that bridges the company's non-financial sustainability and economic sustainability.

The "Customers and End Users" topics reflects Sirma's responsibility as a B2B provider of IT services and solutions that support customers' operations and have a direct or indirect impact on their end users. In the digital environment in which Sirma operates, trust, security, and the creation of value for customers and society are key elements for the Group's sustainable growth.

The main focus of this topic is on personal data protection and digital security. All of Sirma's solutions are developed and maintained with a view to

preventing unauthorized access, misuse, and cyber risks, in accordance with the principles of ethical business conduct and applicable regulatory standards. Data security is critical to maintaining customer trust, the Company's reputation, and long-term business relationships. Sirma's achievements in personal data protection are attested to by its numerous banking, fintech, and insurance clients, who rely on this security.

A second key focus is digital inclusion. Through its products and services, Sirma helps clients and their end-users gain access to digital services, new technologies, and more efficient solutions, thereby contributing to social and economic inclusion amid rapid technological transformation. A good example of the digital inclusion provided by Sirma is the various payment applications implemented by Sirma, through which customers with no or limited access to financial services gain access to them.

This topic also includes customer-centric innovations, where Sirma develops personalized solutions based on in-depth knowledge of business processes, cutting-edge technologies, and the responsible use of digital capabilities. Through this approach, the Group creates long-term value for clients, end users, and society as a whole. This is Sirma's key competitive advantage: integrating in-depth knowledge of the businesses in the verticals it serves with the latest digital technologies. In 2025, and in the coming years, this has been artificial intelligence. The Sirma.AI Enterprise platform developed by the Company ensures rapid customer adoption of the AI revolution, personalized solutions tailored to their business, and—most importantly—protection of customer data from the AI agents themselves.

Impact, Risks, and Opportunities

As a B2B provider of IT services and solutions, Sirma has a significant indirect impact on a wide range of clients, as well as on their end users. The positive **impact** manifests itself in enhanced digital security, greater business process efficiency, and expanded access to digital services—including for groups and sectors that until recently were not digitally served. Through customer-centric innovations, Sirma contributes to the sustainable development of its clients and to the public good.

The main **risks** are related to growing cyber threats, the risk of misuse of customer data by AI agents, data privacy, and rapid technological obsolescence. A security breach or insufficiently inclusive solutions could lead to a loss of trust, customers, and reputation. This would limit repeat business and reduce Sirma's revenue, profit, and economic sustainability.

At the same time, this topic presents significant **opportunities**. Increased cybersecurity requirements, accelerated digital transformation, the opportunities offered by AI, climate challenges, and constant technological progress are driving demand for secure, innovative, and inclusive IT solutions. This enables Sirma to strengthen its competitiveness, expand its customer base, and create long-term value through responsible innovation.

Measuring impact, mitigating risks, and capitalizing on opportunities is reflected in Sirma's financial results. These are disclosed quarterly, with key highlights outlined in the "Business Model" section above.



Measures Taken in 2025



Enhancing cybersecurity and personal data protection in customer solutions

In 2026, Sirma further integrated the principles of *security-by-design* and *privacy-by-design* into the IT solutions it develops, including AI-based and cloud platforms. This includes enhanced access controls, vulnerability monitoring, and stricter requirements for suppliers along the value chain.



Expanding the portfolio of digital inclusion solutions

Sirma continued to develop and implement digital platforms that provide access to services for end users with limited physical or institutional access—including remote financial, healthcare, and administrative services that support social and economic inclusion.



Enhanced collaboration with clients on adapting to new regulatory requirements

In 2026, Sirma assisted its clients in implementing new European regulations in the areas of data protection, digital resilience, and AI through consulting, architectural solutions, and regulatory-compliant IT systems.



Innovations focused on adding value for end users

The Group implemented new functionalities based on artificial intelligence, automation, and data analytics, aimed at improving the user experience, efficiency, and reliability of the services provided by Sirma's clients.



Training and enhancing the digital maturity of clients and end users

Through consulting initiatives and the Sirma Academy in 2026, Sirma expanded training for clients and users on cybersecurity, the practical use of AI, the adoption of new digital solutions, and the responsible implementation of innovative technologies.



KPIs and Results

KPIs for Clients and end Users

2025

Growth of consolidated sales from previous year

31%

Percentage of recurring revenue during the year

38%





Ecological Footprint of Sirma's Activities

"Sustainability does not have to come at the cost of slowed growth and reduced profits. On the contrary, sustainability reduces both risks and costs for the company. At Sirma, we are fully aware of this"

Tsvetan Trenchev

Chief Operating Officer,
Sirma Group Holding JSC



Main Ecological KPIs

Scope 1

Fuel for own auto-park 2025	Number of cars	Benzine in liters	Diesel in liters
Quantity	11	5,929	6,599
tCO2e*		12.27	16.96

*for conversion into CO2 equivalent the platform of Defra GHG Conversion Factors for Company Reporting <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2025>

Scope 2

Ecological KPIs	2025	2025 tCO2e*	Change y/y
Heat consumption	326 MWh	58.57	+7.26
Electricity consumption	1,835 MWh	621.97	-24.72
Total energy in MWh	2,163 MWh	680.54	-17.53
Per employee	2.61 MWh	0.86	-0.12
Generated renewable electricity in MWh **	87 MWh	29.46	4.74

*for conversion into CO2 equivalent the platform of Ember Climate 2025 at <https://ember-energy.org/>

** which is part of the "Electricity consumed", and accordingly the above factor was used, reflecting saved energy tCO2e

2025 Scope 1+ Scope 2 = **tCO2e 710.51**

Other Ecological KPIs:

Ecological KPIs	2025
Water consumption m ³	5,601
Average hardware usage time	6.92 years
Recycled hardware in 2025	3,374 kg





Energy and Climate Change

The topic “Energy and Climate Change” was identified as doubly significant following a thorough analysis (described above). The topic encompasses subtopics from ESR5 E1.

We fully recognize the risks posed by climate change resulting from greenhouse gas emissions. Our business model and strategic priorities are firmly aligned with the transition to a sustainable economy, supporting the objectives of the Paris Agreement to limit global temperature increase to well below 2°C—striving for 1.5°C above pre-industrial levels—and the EU Climate Law (Regulation (EU) 2021/1119), which sets the goal of achieving climate neutrality by 2050.

The review of the topics related to sustainability found that electricity use is of leading importance for Sirma’s activities while also having a negative impact on the environment and climate. The **risks** for Sirma’s activities related to energy and climate change are significant:

Lack or interruption of electricity supply results in a complete interruption of operations;

Increase in the price of electricity (similar to the price of electricity in Bulgaria in 2022) increases costs and, consequently, the price of the added value by Sirma;

The transition to a low-carbon economy involves financial costs;

Changes in regulations and an increase in the administrative burden lead to higher costs (e.g., costs associated with compliance with the CSRD);

lack of water and the challenges arising from this

The topic of “Energy and Climate Change” presents, in addition to risks, a number of **opportunities** for Sirma:

Potential for new software solutions and services related to sustainability among Sirma’s customers;

Production of own renewable energy and reduction of electricity costs;

Attracting investors who, like Sirma, are concerned about protecting nature;

Reduction of costs from reduced energy and water consumption.

Action taken in 2025

The **actions taken** to adapt to these risks, reduce their impact, and realize the opportunities include:



Improving operational sustainability

The construction and equipping of a new transformer station at Sirma’s headquarters, which is designed to utilize the energy generated by the photovoltaic system;



Changing business practices

Actively utilizing remote work and increasing the number of virtual meetings to reduce fuel consumption for transportation;



Energy efficiency measures for its offices

The renovation and improvement of **energy efficiency** in 35% of Sirma’s building stock;



ISO certification renewal

Renewal of the ISO 14001:2015 certification—Environmental Management Systems



Production of renewable energy

Accounting for 23% of electricity consumption at the Group’s headquarters;



Measures to reduce total greenhouse gas emissions and align with global climate goals

Replacing the aging internal combustion engine (ICE) fleet with new hybrid and fully electric vehicles.





Environmental Achievements in 2025

Environmental Data

Throughout the year, Sirma continues to collect data on energy consumption under Scope 1 and Scope 2 from all of its offices. This enables the Group to accurately set its targets for reducing the direct carbon footprint of its operations.

Energy Efficiency

In 2025, a brand-new substation was built and fully equipped at Sirma's central building. In addition to improved energy efficiency, the new equipment ensures optimal operation of the adjacent photovoltaic system. This substation enables the future expansion of the photovoltaic plant, which is scheduled to take place in 2027.

In parallel with the new substation, Sirma launched a program for the renovation and energy efficiency of its workspaces. By 2025, 35% of the workspaces at the group's headquarters had been renovated. The program continues in the coming years.

These steps in energy efficiency provide for a small decrease in the energy required to run operations. Sirma registered a 25 MWh drop in consumed energy during 2025.

The Photovoltaic System

The photovoltaic system, which was installed at the end of 2023 on Sirma's headquarters building, has been operating successfully throughout the year. The system generated 86,5 MWh of renewable energy during the year, thereby meeting 23% of the building's energy needs. This production and use of renewable energy marks a 19% rise y/y for Sirma.

In pursuit of its goal to increase the share of renewable energy in its energy mix, Sirma continued to invest in the photovoltaic project. In 2025, a dedicated substation was built for the system (with an investment of BGN 211,000), which is expected to increase renewable energy production and cover one-third of the building's energy needs.

Fleet Renewal

In 2025, 35% of the group's company fleet was renewed. In the process, old internal combustion engine vehicles were replaced with brand-new hybrid or fully electric vehicles.

Yield



Consumption



Energy Management

MWh





Charging Electric Vehicles

In addition to producing renewable electricity, in 2025 Sirma laid the groundwork for promoting the use of electric vehicles. An increasing number of the company's employees own electric vehicles. In pursuit of both its environmental goals and its commitment to the well-being of its employees, in 2025 Sirma installed a second (following the station installed at the Sirma office in Plovdiv in 2024) charging station for electric vehicles near the Group's central building. Following an analysis of consumption, an expansion of the network of charging stations around Sirma's offices is expected in 2026.



Energy Intensity

Sirma's energy consumption, and consequently its carbon footprint under Scope 1 and 2 decreased slightly in 2025 compared to 2024: by **33 MWh** or **17 tCO₂e**, respectively. This is due to the increased energy efficiency, increased renewable energy production, and the renewed vehicle fleet described above. Although the improvements may seem insignificant at first glance, they become material when we consider the increase in Sirma's workforce (+21%) and the rise in revenue (+31%) during the year. Combining these figures reveals Sirma's true achievements. The energy intensity of the Group's operations has been reduced by nearly 25% to 10.64 tCO₂e per €1,000,000 in revenue, as has the energy required per Sirma employee, which has decreased by nearly 16%, reaching an average of 0.86 tCO₂e per employee in 2025.



Ecological Goals for 2026

Sirma has always taken a responsible approach to nature, energy consumption, and the environmental footprint of its operations. To establish well-founded and scientifically sound decarbonization targets, the groundwork was laid in 2023 and subsequently in 2024 to collect information and measure the Group's environmental footprint under Scopes 1 and 2, as defined in the Greenhouse Gas Protocol. Using this data, Sirma is already successfully taking steps to reduce its environmental impact and will be able to properly determine its next steps for 2026 to mitigate its negative impact on the environment and set specific decarbonization targets.

The Group's direct environmental goals for 2026 are:

- Defining the **relevant Scope 3** categories and laying the groundwork for data collection and related calculations for the Group;
- Complete **replacement of the chiller** (which cools and heats the entire building) at Sirma's central building with a new, highly energy-efficient model. The budget for this project is EUR 150,000;
- Continuing the expansion of **charging stations** for electric vehicles around Sirma's offices;
- Continuing with the **renovation and improvement of energy efficiency** of our own building stock. The budget for this project for the year is EUR 350,000, of which EUR 90,000 is specifically allocated to improving the energy efficiency of the facade of Sirma's headquarters.



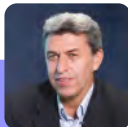


Corporate Governance at Sirma

"We uphold the highest ethical standards in our management and operations, ensuring transparency, accountability, and integrity. Our governance framework is built on the principles of responsible business conduct, ensuring that our clients can trust us not only for cutting-edge technology but also for ethical business practices"

Georgi Marinov

Chairman of the Board of Directors,
Sirma Group Holding JSC



Applicable Governance KPIs

Governance KPIs	2025
Revised and updated internal documents	all
Cybersecurity incidents detected in Sirma during the year	0
Received reports of irregularities in Sirma during the year	0
Cases of corrupt practices identified in Sirma during the year	0
Shareholder participation - voting shareholders % of capital	67.23%
Violations and fines found by supervisory authorities	0
Payment of dividends on each share	BGN 0.02
Change in the price of SGH shares in 2025	+49%

The due diligence identified two essential topics that are related to sustainable governance:

Corporate Governance, Values, Dialogue and Culture

Corporate governance, values and culture at Sirma reflect the framework through which the Company is managed, controlled, motivated and supervised, as well as the way in which the governing bodies

integrate sustainability, ethics, and responsible conduct into the strategy and business model. In accordance with **ESRS G1 – Business Conduct and the disclosures under ESRS 2 (GOV 1 and GOV 2)**, the corporate governance system ensures a clear allocation of roles and responsibilities among the Board of Directors, the specialized committees, and the management team, as well as independent oversight of key management and risk processes.

The governance framework is designed to ensure transparency, accountability, and timely decision-making, while also supporting the integration of environmental, social, and governance (ESG) factors into strategic planning and operational management. Central to this are established ethical standards, the management of conflicts of interest, the prevention of corruption, and the existence of effective mechanisms for reporting and addressing concerns.

Corporate values and a culture of integrity support sustainable risk management, including regulatory, reputational, and cyber risks, and create a foundation of trust among investors and other stakeholders. Through the consistent implementation and updating of management policies and practices, Sirma aims to maintain high standards of corporate governance, consistent with the requirements of the CSRD, and to ensure long-term sustainability and value creation.





Impact, Risks and Opportunities

The corporate governance system has an impact on all stakeholders. **This impact** includes:

integrating sustainability into existing corporate structures;

aligning business strategies with environmental and social goals;

preventing corrupt practices;

ensuring opportunities and protections for whistleblowing;

developing and harmonizing corporate culture and values;

ensuring responsible procurement and payment practices;

ensuring sustainable cybersecurity.

Effective governance frameworks enable Sirma to manage sustainability-related risks, comply with existing regulations, and meet stakeholder expectations, while simultaneously fostering innovation and operational efficiency. By establishing

clear roles, responsibilities, and performance metrics across the organization, sustainable management not only supports ethical practices but also positions the company for sustainability and growth in a rapidly changing global landscape.

The main **risks** associated with this topic include potential violations of ethical standards, insufficient employee awareness of internal rules and policies, as well as ineffective or perfunctory dialogue with stakeholders. Such shortcomings can lead to reputational damage, loss of trust, legal and regulatory consequences, as well as lower employee engagement and satisfaction. **An additional risk** is the increasing regulatory requirement for transparency and accountability (including under the CSRD and those related to dual listing), which requires constant updating of the internal regulatory framework. The due diligence identified the following key risks related to the corporate governance system:

- increasing **regulatory requirements**, which lead to additional costs to meet them;
- **reputational risk** caused by non-compliance, which could lead to a decline in Sirma's sales and revenue;
- risks from **cyberattacks** and breaches in digital security systems, which threaten both the Company's operations and the information of customers and end users;
- **supply chain disruptions**, which threaten or delay the delivery of one of Sirma's core services—system integration, which relies on hardware deliveries.

The topic also reveals significant **opportunities** for Sirma. By establishing a strong management culture based on clear values, ethical conduct, and active dialogue, the company can strengthen its position as a reliable and preferred partner and employer. Structured dialogue with stakeholders enables the timely identification of expectations, risks, and business opportunities, as well as better strategic planning. The development and improvement of the corporate governance system brings significant **opportunities**:

Systematic implementation of the recommendations set forth in internal regulatory documents leads to a harmonized corporate culture;

enhance employee motivation;

Enhanced digital security through the creation, refinement, and implementation of a systematic cyber-defense methodology;

Ensuring consistent supply even during crises by analyzing and optimizing the supply chain;

By implementing responsible data management practices and developing AI-based technological solutions, Sirma creates an opportunity to position itself as a reliable partner and attract investors focused on sustainable and ethical business models;

By actively communicating and demonstrating the digital security measures implemented, including through targeted information campaigns and disclosures to the market, opportunities are created to build investor confidence and improve access to capital.





To mitigate potential risks and maximize opportunities, Sirma has taken the following **actions**:

Impact – Strengthening Integrity, Transparency, and Trust

Sirma has established a **comprehensive framework of policies and internal rules** that define standards for ethical conduct, transparency, and accountability. The company maintains and regularly updates the **Code of Ethical Conduct**, Anti-Corruption Policy, Data Protection Policy, Human Rights Policy, and Whistleblowing Rules. These documents are publicly available and applicable throughout the Group. The single-tier governance system with clearly defined roles for the Board of Directors and the specialized committees (including the Investment, Risk, and Sustainability Committee; the Compensation Committee; and the Disclosure Committee) ensures independent oversight and responsible decision-making.

Risks – Regulatory, Reputational, and Organizational

To mitigate the risk of non-compliance with regulatory requirements and loss of trust, Sirma conducts **regular reviews and updates of its internal regulatory framework**, including in connection with the new CSRD requirements.

Internal audits and independent financial and non-financial controls

are conducted; for 2025, the auditor is Grant Thornton Bulgaria. The risk of low employee awareness and engagement is addressed by ensuring **broad access to internal documents** and through digitized internal communication channels, as described in the Sustainability Report.

Opportunities – trust, engagement, and strategic sustainability

Sirma actively develops a **structured dialogue with stakeholders**, particularly with employees and shareholders. The company maintains an active Investor Relations function, regular disclosures via X3News, Investor.bg, and Infostock, as well as a bilingual IR section on its website.

Webinars and public presentations of financial results are held, offering the opportunity for direct dialogue with management, which strengthens trust and transparency.

Sirma uses internal surveys to assess awareness of policies and the effectiveness of communication, applying the results to improve management practices and transparency.

Achievements in 2025



Corporate Governance

In 2025, Sirma Group Holding AD further strengthens and structures its corporate governance system by clearly defining the roles and responsibilities of the Board of Directors and the specialized committees (including the Risk and Sustainability Committee, the Remuneration Committee, and the Disclosure Committee). This supports compliance with the ESRS requirements under **ESRS 2 GOV-1 (governance and oversight)** and **GOV-2 (conflicts of interest, independence)**, while enhancing accountability and transparency in strategic and management decision-making.



Code of Ethical Conduct and Internal Rules

In 2025, the Company updated and expanded the **Code of Ethical Conduct**, as well as key internal documents: Anti-Corruption Policy, Personal Data Protection Policy, Human Rights Policy, and Whistleblowing Rules (whistleblowing). The documents are available to all group companies and contain references to the new CSRD and ESRS requirements. This achievement directly addresses **ESRS G1 (Business Conduct)** and supports the KPI *“Existence and updating of a Code of Ethical Conduct”*, thereby reinforcing the ethical framework and standard of conduct throughout the organization.



Access to Internal Documents and Policy Updates

All Group employees have digital access to internal management documents via the centralized Sirma Knowledge Center platform. As a result of activities in 2025, **all employees** have active access to internal rules and policies, which meets the KPI *“% of employees with access to the company’s internal documents”*. At the same time, **over 90% of key internal documents** were reviewed and updated during the year, which corresponds to the KPI *“% of internal documents updated during the year”* and supports ESRS responsibilities under GOV-1 and GOV-2.



Dialogue with Investors and Expansion of IR Activities

In 2025, the Company expanded its dialogue with investors and shareholders through regular publications on X3News, Investor.bg, and Infostock, as well as a bilingual IR section on the website, webinars, and public presentations of financial results with the opportunity for direct Q&A with management. Sirma also prepared and published its Sustainability Report, following the recommendations of the CSRD and ESRS, despite the regulatory requirement for this having been removed.

These activities align with **ESRS 2 IRO-1 (Investor Dialogue)** and support the sustainability of the topic *“Corporate Governance, Values, and Dialogue,”* thereby strengthening trust, transparency, and the long-term investment base.



Preparation for dual listing and increased transparency

In 2025, the Board of Directors approved the **Prospectus for the admission of Sirma's shares to trading on a regulated market in Frankfurt**, as part of the dual listing strategy. This achievement requires further enhanced management and disclosure discipline, which contributes to compliance with **ESRS requirements under GOV-1 and GOV-2** and establishes Sirma as a company with high standards of corporate governance and accountability. All necessary steps were taken to ensure transparency and full compliance with the requirements of the Frankfurt Stock Exchange and the German market.



KPIs for Corporate Governance

Corporate Governance, values and dialogue	2025
Existence and updating of a Code of Ethical Conduct	Yes
% of employees with access to the company's internal documents	100%
% of internal documents that were updated during the year	90%
Number of shareholder information events (e.g., Investor Day)	7
Number of disclosures and reports for shareholder information (e.g., Quarterly Activity Report)	29
Whistleblowing on abuse and corruption	0



Goals for 2026

- Review and update all internal documents in light of changes to the regulatory framework and the introduction of the euro in Bulgaria;
- Ensure 100% access to all internal documents for every employee of the company in both Bulgarian and English;
- Election of a new Board of Directors for Sirma Group Holding (the term of the current Board is expiring);
- Dual listing of the company's shares and achieving full compliance with the requirements of the German market;
- Developing a methodology for collecting ESG data from suppliers, partners, and other entities in the value chain;
- Enhancing the company's transparency and accountability by preparing and regularly publishing a Sustainability Report in accordance with applicable disclosure requirements;
- Maintaining zero tolerance for identified cases of corruption, conflicts of interest, and violations of ethical standards;
- Continuing the effective integration of acquired companies by aligning management practices and ESG policies;
- Improving sustainable practices through regular monitoring, evaluation, and updating of internal policies and processes.

Care for Shareholders

Corresponding ESRS standard

ESRS G1 – Business Conduct

Links to ESRS 2 – GOV-1, GOV-2, SBM-3, IRO-1

The first company in the Group—Sirma AI—was established way back in 1992. In 2015, Sirma Group Holding AD—the Group's holding company—went public following a successful initial public offering. Since then, Sirma has had a new and significant group of stakeholders—its shareholders. This was also confirmed by the due diligence conducted in 2024. Thus, the topic of "Shareholder Care" was identified as doubly material for Sirma.

This topic concerns the company's commitment to protecting the rights and interests of shareholders through equal treatment, transparency, and timely disclosure of information. It includes effective corporate governance, open dialogue with investors, access to reliable information, and best practices in strategic decision-making. Shareholder care aims to build trust, a stable investor base, and sustainable long-term growth.

A specific opportunity that arose in 2025 stems from the dual listing of the Company's shares. By expanding access to capital markets, an opportunity is created to increase the liquidity of the shares and boost investor interest, which enhances long-term value for shareholders.



Impact, Risks, and Opportunities

The topic of "Shareholder Care" is of significant importance to the sustainable development and market reputation of Sirma Group Holding. The company ensures a **positive impact** on shareholders through equal treatment, transparency, and the timely disclosure of complete and reliable information, as well as the regular payment of dividends. Active and open dialogue with current and potential investors helps build trust, a stable shareholder structure, and long-term support for the Group's strategic decisions.

The relationship with shareholders is two-way—they also have a strong and direct financial impact on Sirma. It is the shareholders who have been the source in the past, and the potential source in the future, of the investment capital so valuable to the company.

The main **risks** associated with this topic include potential delays or omissions in the disclosure of regulated information, ineffective communication with investors, or limited shareholder participation in General Meetings. Such situations could lead to reputational damage, regulatory sanctions, diminished trust, and reduced interest from capital markets. An additional risk stems from growing regulatory requirements for transparency and accountability, including those under the CSRD.

At the same time, this topic presents significant **opportunities** for Sirma. By maintaining a strong Investor Relations function, a formalized IR policy, and clear communication procedures, the company can enhance shareholder engagement, increase their participation in General Meetings, and strengthen its

market positioning, including among international investors. Timely and proactive communication helps attract long-term investors and reduces capital market risk.

Actions Taken Regarding "Shareholder Care"

Sirma Group Holding has taken consistent steps to protect the rights and interests of shareholders and to strengthen confidence in the capital market, as part of the best practices under ESRS G1.

Timely and Transparent Disclosure of Information

The company follows established procedures for publishing financial statements, regulatory, and supplementary information, minimizing the risk of delays and discrepancies.

Active Investor Relations dialogue

We maintain constant communication with shareholders and investors through the Investor Relations section of the website, public announcements, webinars, and direct contacts.

Equal Treatment of Shareholders

All shareholders have equal access to information, regardless of the size of their equity stake.

Support for Shareholder Participation

Participation in General Shareholders' Meetings is encouraged through timely information and clear procedures.

Formalized IR framework

The company develops and implements an Investor Relations policy and internal rules ensuring consistency, accountability, and compliance with regulatory requirements.



Key performance indicators for this topic

Care for Shareholders	2025
Penalties or complaints regarding a lack of, or delays in communication with investors	0
Percentage of late publications of reports and announcements	0
Percentage of capital participating in GSM	75% +
Formalized Investor Relations policy and procedure	Yes
Penalties and fines imposed by regulators for non-compliance	No
Change in the company's stock price y/y	+49%





2025 Achievements on the Topic of Shareholder Care

Timely and complete disclosure of regulated information without penalties

In 2025, Sirma fulfills its obligations for timely disclosure of information through established platforms and IR channels, without any publicly recorded penalties or complaints from investors regarding delays, confirming the effectiveness of the Investor Relations function.

Successful preparation for dual listing and access to international investors

The company successfully prepared for dual listing on both the Bulgarian Stock Exchange and the **Frankfurt Stock Exchange (Xetra)**, ensuring equal access to information for local and international shareholders. This enhances the transparency and liquidity of the shares.

Active and structured dialogue with investors

Throughout the year, Sirma organized investor webinars and public presentations of financial results with opportunities for direct questions to management, as well as participation in Investor Day, thereby strengthening shareholder trust and engagement. In 2025 the investor section of Sirma's site was updated in order to provide more information, easier navigation, and a contemporary design.

Effective corporate governance and internal control

In 2025, the specialized committees of the Board of Directors (including the Information Disclosure Committee and the Investment, Risk, and Sustainability Committee) are functioning successfully, and the independent external audit supports the reliability of the financial information provided to shareholders.

Consistent shareholder remuneration policy

In accordance with the Dividend Policy and the decisions of the General Meeting, in 2025 Sirma pays a dividend to shareholders for 2024, demonstrating a commitment to creating and sharing long-term value.

2026 Goals for the Shareholder Care Topic

- Achieve and maintain full transparency on both markets where the Company's shares are listed;
- Translate the investor section of the Company's website into German and begin disclosing information in German;
- Maintain timely disclosure of information from the previous year and the absence of complaints and sanctions;
- Increase the represented capital at the General Meeting to 80%;
- Explore a platform for conducting hybrid General Meetings (to hold one in 2027).





Appendix 1

In 2025, Sirma's internal documents are:

System of Corporate Governance	Description	Adoption	Latest review	Application
<u>Articles of Association</u>	The Articles of Association define the rules by which important decisions are made in the Company	2015	10.01.2025	SGH
<u>Decisions of the General Meeting of Shareholders</u>	The decisions of the shareholders are fundamental to the Company's activities	Minimum once per year	10.01.2025	SGH
<u>Dividend Policy</u>	Policy for the distribution of dividends of the public company	29.09.2022		SGH
<u>Rules for the operation of the Board of Directors</u>	Instructions and clarifications on the duties and responsibilities of the members of the Board of Directors	2015		All subsidiaries
<u>Remuneration Policy</u>	Remuneration policy for the members of the Board of Directors	2015	17.09.2024	SGH
<u>Instruction for the obligations and responsibilities of insiders</u>	Instructions and clarifications on duties and responsibilities when accessing and working with inside information.	2015	30.08.2023	All subsidiaries
<u>Program for good corporate governance</u>	A system of rules that protects the interests of shareholders and other stakeholders	2015	2023	All subsidiaries
<u>Accounting Policy</u>	Policy which governs the accounting and control in the companies	2015	30.06.2023	All subsidiaries
<u>Anti-corruption Policy</u>	Policy against all corruption practices and related phenomena		2015	All subsidiaries
<u>Rules for the protection of whistleblowers</u>	Internal Rules for Submitting Signals and Protection of Persons Submitting Signals or Publicly Disclosing Information for Violations – "Whistleblowers"		04.05.2023	All subsidiaries
<u>Ethical code of conduct for employees</u>	The Code establishes the norms for ethical behavior of employees at Sirma Group Holding	2020	15.12.2024	All subsidiaries

System of Corporate Governance	Description	Adoption	Latest review	Application
<u>Data protection Policy</u>	Privacy and data protection policy for the clients of Sirma		2021	All Subsidiaries
<u>Sustainability Policy</u>	Policy for the sustainable function and development of the companies in Sirma	2021	30.09.2024	All Subsidiaries
<u>Human rights policy</u>	Policy, which determines attitude to human rights in Sirma	2023	25.03.2024	All Subsidiaries
<u>CSR in procurement policy</u>	A policy that integrates CSR into Sirma's procurement practice	2023	25.03.2024	All subsidiaries
<u>Waste management policy</u>	The Policy which provides the guidelines for reduction of waste generation by Sirma and a transition to a circular economy.	2022	31.03.2024	All Subsidiaries
<u>Health and safety policy</u>	The Policy for providing a safe and secure working space.	2021	25.03.2024	All subsidiaries
<u>Risk management policy</u>	The policy for identifying, measuring and managing of risks.	2020	25.03.2024	All subsidiaries
<u>Workplace regulation</u>	Defines the rules linked to the working process in Sirma	2015	25.03.2024	All subsidiaries
<u>Policy for information dissemination</u>	Policy for communication with investors and other stakeholders.	2015	25.03.2024	All subsidiaries



Appendix 2

List of ESRS Indicators

ESRS 2 - General Disclosures

ID	Name	Topic / Section in the Report
BP-1_01	Basis for preparation of sustainability statement	Scope
BP-1_02		Scope
BP-1_03	Scope of consolidation of consolidated sustainability statement is same as for financial statements	Scope
BP-1_04	Indication of subsidiary undertakings included in consolidation that are exempted from individual or consolidated sustainability reporting	Scope
BP-2_06	Disclosure of extent to which sustainability statement covers upstream and downstream value chain	Scope; Material Topics presentation
BP-2_17	Description of planned actions to improve accuracy in future of metrics that include value chain data estimated using indirect sources	Scope
BP-2_22	Disclosure of reference to paragraphs of standard or framework applied	Materiality of the Sustainability Topics
BP-2_23	List of sustainability matters assessed to be material	The Business Model of Sirma; Materiality of the Sustainability Topics
BP-2_25		Materiality of the Sustainability Topics Material Topic presentations
BP-2_26	Disclosure of how business model and strategy take account of impacts related to sustainability matters assessed to be material (phase-in)	Materiality of the Sustainability Topics Material Topic presentations
BP-2_27		Materiality of the Sustainability Topics
GOV-1_01	Description of policies related to sustainability matters assessed to be material (phase-in)	The Business Model of Sirma
GOV-1_02		The Business Model of Sirma
GOV-1_05	Description of actions taken to identify, monitor, prevent, mitigate, remediate or bring end to actual or potential adverse impacts related to sustainability matters assessed to be material (phase-in) and result of such actions	The Business Model of Sirma
GOV-1_06		The Business Model of Sirma

ID	Name	Topic / Section in the Report
GOV-1_07	Disclosure of metrics related to sustainability matters assessed to be material (phase-in)	The Business Model of Sirma;
GOV-1_08		The Business Model of Sirma; Corporate Governance
GOV-1_09	Number of executive members	The Business Model of Sirma; Corporate Governance
GOV-1_10		The Business Model of Sirma; Corporate Governance
GOV-1_11	Number of non-executive members	The Business Model of Sirma; Corporate Governance
GOV-1_12		The Business Model of Sirma; Corporate Governance
GOV-1_13	Percentage of members of administrative, management and supervisory bodies by gender and other aspects of diversity	The Business Model of Sirma; Corporate Governance
GOV-1_14		The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
GOV-1_16	Board's gender diversity ratio	The Business Model of Sirma; Corporate Governance
GOV-2_01		The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
GOV-2_02	Percentage of independent board members	The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
GOV-2_03		The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
GOV-3_01	Information about identity of administrative, management and supervisory bodies or individual(s) within body responsible for oversight of impacts, risks and opportunities	



ID	Name	Topic / Section in the Report
GOV-3_02		The Business Model of Sirma; Corporate Governance
GOV-3_03	Disclosure of how body's or individuals within body responsibilities for impacts, risks and opportunities are reflected in undertaking's terms of reference, board mandates and other related policies	The Business Model of Sirma; Corporate Governance
GOV-3_06		The Business Model of Sirma; Corporate Governance
GOV-4_01	Description of management's role in governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities	The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
GOV-5_01		The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
GOV-5_02	Description of how oversight is exercised over management-level position or committee to which management's role is delegated to	Materiality of Sustainability Topics
GOV-5_03		Materiality of the Sustainability Topics
GOV-5_04	Information about reporting lines to administrative, management and supervisory bodies	The Business Model of Sirma; Materiality of the Sustainability Topics
SBM-1_01		The Business Model of Sirma
SBM-1_02	Disclosure of how dedicated controls and procedures are integrated with other internal functions	The Business Model of Sirma
SBM-1_03		Social Impact of Sirma's Activity
SBM-1_04	Disclosure of how administrative, management and supervisory bodies and senior executive management oversee setting of targets related to material impacts, risks and opportunities and how progress towards them is monitored	Social Impact of Sirma's Activity
SBM-1_06		The Business Model of Sirma
SBM-1_23	Information about sustainability-related expertise that bodies either directly possess or can leverage	The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
SBM-1_25		The Business Model of Sirma
SBM-1_26	Disclosure of whether, by whom and how frequently administrative, management and supervisory bodies are informed about material impacts, risks and opportunities, implementation of due diligence, and results and effectiveness of policies, actions, metrics and targets adopted to address them	The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics

ID	Name	Topic / Section in the Report
SBM-1_27		The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
SBM-1_28	Disclosure of how administrative, management and supervisory bodies consider impacts, risks and opportunities when overseeing strategy, decisions on major transactions and risk management process	The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
SBM-2_01		The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
SBM-2_02	Disclosure of list of material impacts, risks and opportunities addressed by administrative, management and supervisory bodies or their relevant committees	The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
SBM-2_03		Materiality of Sustainability Topics
SBM-2_04	Incentive schemes and remuneration policies linked to sustainability matters for members of administrative, management and supervisory bodies exist	Corporate Governance; Materiality of Sustainability Topics
SBM-2_05		Corporate Governance; Materiality of Sustainability Topics
SBM-2_06	Description of key characteristics of incentive schemes	Materiality of Sustainability Topics
SBM-2_07		The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
SBM-2_09	Description of specific sustainability-related targets and (or) impacts used to assess performance of members of administrative, management and supervisory bodies	The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
SBM-2_10		Material Topics presentation
SBM-2_11	Description of level in undertaking at which terms of incentive schemes are approved and updated	Materiality of Sustainability Topics
SBM-2_12		The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
SBM-3_01	Disclosure of mapping of information provided in sustainability statement about due diligence process	Materiality of Sustainability Topics
SBM-3_02		Materiality of Sustainability Topics
SBM-3_03	Description of scope, main features and components of risk management and internal control processes and systems in relation to sustainability reporting	Materiality of Sustainability Topics; Material Topics presentation



ID	Name	Topic / Section in the Report
SBM-3_04		Materiality of Sustainability Topics; Material Topics presentation
SBM-3_05	Description of risk assessment approach followed	Materiality of Sustainability Topics; Material Topics presentation
SBM-3_07		Materiality of Sustainability Topics; Material Topics presentation
SBM-3_10	Description of main risks identified and their mitigation strategies	Materiality of Sustainability Topics; Material Topics presentation
IRO-1_01		Materiality of Sustainability Topics
IRO-1_02	Description of how findings of risk assessment and internal controls as regards sustainability reporting process have been integrated into relevant internal functions and processes	Materiality of Sustainability Topics
IRO-1_04		Materiality of Sustainability Topics; Material Topics presentation
IRO-1_06	Description of significant groups of products and (or) services offered	Materiality of Sustainability Topics; Material Topics presentation
IRO-1_09		Materiality of Sustainability Topics
IRO-1_11	Description of significant markets and (or) customer groups served	The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
IRO-1_12		The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
IRO-1_13	Total number of employees (head count)	The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
IRO-1_14		The Business Model of Sirma; Corporate Governance; Materiality of Sustainability Topics
IRO-1_15	Number of employees (head count)	Materiality of Sustainability Topics; Material Topics presentation
IRO-2_02		Materiality of Sustainability Topics; Material Topics presentation
IRO-2_13	Total revenue	Materiality of Sustainability Topics; Material Topics presentation

ESRS 2 MDR

ID	Name	Topic / Section in the Report
MDR-P_01	Description of key contents of policy	The Business Model of Sirma; Corporate Governance
MDR-P_02		The Business Model of Sirma; Corporate Governance
MDR-P_03	Description of scope of policy or of its exclusions	The Business Model of Sirma; Corporate Governance
MDR-P_04		The Business Model of Sirma; Corporate Governance
MDR-P_05	Description of most senior level in organisation that is accountable for implementation of policy	The Business Model of Sirma; Corporate Governance
MDR-P_06		The Business Model of Sirma; Corporate Governance
MDR-A_01	Disclosure of third-party standards or initiatives that are respected through implementation of policy	The Business Model of Sirma; Corporate Governance; Material Topics presentation
MDR-A_02		The Business Model of Sirma; Corporate Governance; Material Topics presentation
MDR-A_04	Description of consideration given to interests of key stakeholders in setting policy	The Business Model of Sirma; Corporate Governance; Material Topics presentation
MDR-M_01		The Business Model of Sirma; Corporate Governance; Material Topics presentation



E1 - Climate Change

ID	Name	Topic / Section in the Report
E1-4_03	Absolute value of total Greenhouse gas emissions reduction	Ecological Footprint of Sirma's Activities
E1-4_06		Ecological Footprint of Sirma's Activities
E1-4_09	Absolute value of Scope 1 Greenhouse gas emissions reduction	Ecological Footprint of Sirma's Activities
E1-4_11		Ecological Footprint of Sirma's Activities
E1-5_05	Absolute value of location-based Scope 2 Greenhouse gas emissions reduction	Ecological Footprint of Sirma's Activities
E1-5_08		Ecological Footprint of Sirma's Activities
E1-5_09	Intensity value of location-based Scope 2 Greenhouse gas emissions reduction	Ecological Footprint of Sirma's Activities
E1-5_17		Ecological Footprint of Sirma's Activities
E1-6_07	Total energy consumption from renewable sources	Ecological Footprint of Sirma's Activities
E1-6_09		Ecological Footprint of Sirma's Activities
E1-6_30	Consumption of self-generated non-fuel renewable energy	Ecological Footprint of Sirma's Activities

S1 - Own Workforce

ID	Name	Topic / Section in the Report
S1.SBM-3_01	All people in its own workforce who can be materially impacted by undertaking are included in scope of disclosure under ESRs 2	Social Impact of Sirma's Activity
S1.SBM-3_02	Description of types of employees and non-employees in its own workforce subject to material impacts	Social Impact of Sirma's Activity
S1.SBM-3_03	Material negative impacts occurrence (own workforce)	Social Impact of Sirma's Activity
S1.SBM-3_04	Description of activities that result in positive impacts and types of employees and non-employees in its own workforce that are positively affected or could be positively affected	Social Impact of Sirma's Activity
S1.SBM-3_05	Description of material risks and opportunities arising from impacts and dependencies on own workforce	Social Impact of Sirma's Activity
S1.MDR-P_01-06	Policies to manage material impacts, risks and opportunities related to its own workforce [see ESRs 2 MDR-P]	Social Impact of Sirma's Activity; Corporate Governance
S1-1_03	Description of relevant human rights policy commitments relevant to own workforce	Social Impact of Sirma's Activity; Corporate Governance

ID	Name	Topic / Section in the Report
S1-1_04	Disclosure of general approach in relation to respect for human rights including labour rights, of people in its own workforce	Social Impact of Sirma's Activity; Corporate Governance
S1-1_05	Disclosure of general approach in relation to engagement with people in its own workforce	Social Impact of Sirma's Activity; Corporate Governance
S1-1_09	Workplace accident prevention policy or management system in place	Social Impact of Sirma's Activity; Corporate Governance
<u>S1.MDR-A_01-12</u>	Action plans and resources to manage its material impacts, risks, and opportunities related to its own workforce [see ESRs 2 - MDR-A]	Social Impact of Sirma's Activity; Corporate Governance
S1-4_01	Description of action taken, planned or underway to prevent or mitigate negative impacts on own workforce	Social Impact of Sirma's Activity; Corporate Governance
S1-4_03	Description of additional initiatives or actions with primary purpose of delivering positive impacts for own workforce	Social Impact of Sirma's Activity; Corporate Governance
S1-4_04	Description of how effectiveness of actions and initiatives in delivering outcomes for own workforce is tracked and assessed	Social Impact of Sirma's Activity; Corporate Governance
S1-4_05	Description of process through which it identifies what action is needed and appropriate in response to particular actual or potential negative impact on own workforce	Social Impact of Sirma's Activity; Corporate Governance
S1-4_06	Description of what action is planned or underway to mitigate material risks arising from impacts and dependencies on own workforce and how effectiveness is tracked	Social Impact of Sirma's Activity; Corporate Governance
S1-4_07	Description of what action is planned or underway to pursue material opportunities in relation to own workforce	Social Impact of Sirma's Activity; Corporate Governance
<u>S1.MDR-T_01-13</u>	Targets set to manage material impacts, risks and opportunities related to own workforce [see ESRs 2 - MDR-T]	Social Impact of Sirma's Activity; Corporate Governance Social Impact of Sirma's Activity; Corporate Governance
S1-6_01	Characteristics of undertaking's employees - number of employees by gender [table]	Social Impact of Sirma's Activity
S1-6_02	Number of employees (head count)	Social Impact of Sirma's Activity
S1-6_07	Characteristics of undertaking's employees - information on employees by contract type and gender [table]	Social Impact of Sirma's Activity
S1-6_09	Number of employees (head count or full-time equivalent)	Social Impact of Sirma's Activity
S1-6_10	Number of employees (head count or full-time equivalent)	Social Impact of Sirma's Activity



ID	Name	Topic / Section in the Report
S1-6_11	Number of employee who have left undertaking	Social Impact of Sirma's Activity
S1-9_01	Gender distribution in number of employees (head count) at top management level	Social Impact of Sirma's Activity
S1-9_02	Gender distribution in percentage of employees at top management level	Social Impact of Sirma's Activity
S1-9_03	Distribution of employees (head count) under 30 years old	Social Impact of Sirma's Activity
S1-9_04	Distribution of employees (head count) between 30 and 50 years old	Social Impact of Sirma's Activity
S1-9_05	Distribution of employees (head count) over 50 years old	Social Impact of Sirma's Activity
S1-10_01	All employees are paid adequate wage, in line with applicable benchmarks	Social Impact of Sirma's Activity
S1-13_01	Training and skills development indicators gender [table]	Social Impact of Sirma's Activity
S1-13_02	Percentage of employees that participated in regular performance and career development reviews	Social Impact of Sirma's Activity
S1-14_01	Percentage of people in its own workforce who are covered by health and safety management system based on legal requirements and (or) recognised standards or guidelines	Social Impact of Sirma's Activity
S1-14_02	Number of fatalities in own workforce as result of work-related injuries and work-related ill health	Social Impact of Sirma's Activity
S1-14_04	Number of recordable work-related accidents for own workforce	Social Impact of Sirma's Activity
S1-14_07	Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health related to employees	Social Impact of Sirma's Activity
S1-15_02	Percentage of entitled employees that took family-related leave	Social Impact of Sirma's Activity
S1-16_01	Gender pay gap	Social Impact of Sirma's Activity
S1-17_02	Number of incidents of discrimination	Social Impact of Sirma's Activity
S1-17_03	Number of complaints filed through channels for people in own workforce to raise concerns	Social Impact of Sirma's Activity
S1-17_08	Number of severe human rights issues and incidents connected to own workforce	Social Impact of Sirma's Activity

S4 - Consumers and End-users

ID	Name	Topic / Section in the Report
S4.SBM-3_02	Description of types of consumers and end-users subject to material impacts	The Business Model of Sirma; Social Impact of Sirma's Activity - clients and End Users
S4.SBM-3_03	Type of consumers and end-users subject to material impacts by own operations or through value chain	The Business Model of Sirma; Social Impact of Sirma's Activity - clients and End Users
S4.SBM-3_04	Material negative impacts occurrence (consumers and end-users)	The Business Model of Sirma; Social Impact of Sirma's Activity - clients and End Users
S4.SBM-3_05	Description of activities that result in positive impacts and types of consumers and end-users that are positively affected or could be positively affected	The Business Model of Sirma; Social Impact of Sirma's Activity - clients and End Users
S4.SBM-3_06	Description of material risks and opportunities arising from impacts and dependencies on consumers and end-users	The Business Model of Sirma; Social Impact of Sirma's Activity - clients and End Users
<u>S4.MDR-P_01-06</u>	Policies to manage material impacts, risks and opportunities related to consumers and end-users [see ESRS 2 MDR-P]	The Business Model of Sirma; Social Impact of Sirma's Activity - clients and End Users
S4-1_01	Policies to manage material impacts, risks and opportunities related to affected consumers and end-users, including specific groups or all consumers / end-users	The Business Model of Sirma; Corporate Governance; Social Impact of Sirma's Activity - clients and End Users
<u>S4.MDR-A_01-12</u>	Action plans and resources to manage its material impacts, risks, and opportunities related to consumers and end-users [see ESRS 2 - MDR-A]	The Business Model of Sirma; Social Impact of Sirma's Activity - clients and End Users
S4-4_01	Description of action planned or underway to prevent, mitigate or remediate material negative impacts on consumers and end-users	The Business Model of Sirma; Social Impact of Sirma's Activity - clients and End Users
S4-4_03	Description of additional initiatives or processes with primary purpose of delivering positive impacts for consumers and end-users	The Business Model of Sirma; Social Impact of Sirma's Activity - clients and End Users
S4-4_09	Description of what action is planned or underway to pursue material opportunities in relation to consumers and end-users	The Business Model of Sirma; Social Impact of Sirma's Activity - clients and End Users
S4-4_15	Disclosure of how consumers and end-users play role in decisions regarding design and implementation of programmes or processes	The Business Model of Sirma; Social Impact of Sirma's Activity - clients and End Users



ID	Name	Topic / Section in the Report
S4-4_16	Information about intended or achieved positive outcomes of programmes or processes for consumers and end-users	The Business Model of Sirma; Social Impact of Sirma's Activity - clients and End Users
S4-5_04	Disclosure of intended outcomes to be achieved in lives of consumers and end-users	The Business Model of Sirma; Social Impact of Sirma's Activity - clients and End Users

G1 - Business Conduct

ID	ESRS	Name	Topic / Section in the Report
G1.GOV-1_01	G1	Disclosure of role of administrative, management and supervisory bodies related to business conduct	The Business Model of Sirma; Corporate Governance;
G1.GOV-1_02	G1	Disclosure of expertise of administrative, management and supervisory bodies on business conduct matters	The Business Model of Sirma; Corporate Governance;
<u>G1.MDR-P-01-06</u>	<u>G1</u>	Policies in place to manage its material impacts, risks and opportunities related to business conduct and corporate culture [see ESRS 2 MDR-P]	The Business Model of Sirma; Corporate Governance;
G1-1_01	G1	Description of how the undertaking establishes, develops, promotes and evaluates its corporate culture	The Business Model of Sirma; Corporate Governance; Material Topics presentation
G1-1_05	G1	Disclosure of safeguards for reporting irregularities including whistleblowing protection	The Business Model of Sirma; Corporate Governance;
G1-1_10	G1	Information about policy for training within organisation on business conduct	The Business Model of Sirma; Corporate Governance;
G1-1_12	G1	Entity is subject to legal requirements with regard to protection of whistleblowers	The Business Model of Sirma; Corporate Governance;
G1-3_01	G1	Information about procedures in place to prevent, detect, and address allegations or incidents of corruption or bribery	The Business Model of Sirma; Corporate Governance;
G1-3_03	G1	Information about process to report outcomes to administrative, management and supervisory bodies	The Business Model of Sirma; Corporate Governance;
G1-4_04	G1	Number of confirmed incidents of corruption or bribery	The Business Model of Sirma; Corporate Governance;

