

REPORT
OF THE AUDIT COMMITTEE OF
SIRMA GROUP HOLDING AD for 2025

I. GENERAL INFORMATION

This report of the Audit Committee of Sirma Group Holding AD has been prepared pursuant to Article 108, Paragraph 1, Item 8 of the Independent Financial Audit and Assurance Act, which requires a report on the Audit Committee's activities to be submitted to the appointing body.

1. Composition of the Audit Committee

During the third year of its term, the Audit Committee operated with the following composition:

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

2. Main Activities of the Audit Committee

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

- Monitoring the financial reporting processes within the company;
- Monitoring the effectiveness of internal control systems;
- Monitoring the effectiveness of risk management systems;
- Monitoring the independent financial audit within the company;
- Reviewing the independence of the registered auditor responsible for the audit, and the audit firm in accordance with the requirements of the Independent Financial Audit Act and expressing assurance regarding compliance with the Code of Ethics for Professional Accountants of the International Ethics Standards Board for Accountants (IESBA Code).

II. ACTIVITIES OF THE AUDIT COMMITTEE IN 2025 AND CONCLUSIONS AND FINDINGS

At its regular meetings, based on available information and professional analyses and discussions, in compliance with the requirements of the Law on Independent Financial Audit and Assurance on Sustainability and the Law on Public Offering of Securities, the Audit Committee of Sirma Group Holding AD reached the following findings and conclusions regarding the company's operations in 2025

1. Monitoring of financial reporting processes at Sirma Group Holding AD

The company prepares separate and consolidated quarterly interim financial statements, as well as separate and consolidated annual financial statements, which it submits to the Financial Supervision Commission and discloses to the public. The Audit Committee reviewed the financial calendar on the company's website and the information regarding the publication of periodic reports on the Bulgarian Stock Exchange website and confirmed that the separate and consolidated interim and annual financial statements were submitted within the established deadlines. The Disclosure Committee of the Board of Directors continued to operate during the reporting period to support the process of more effective financial reporting and disclosure of financial information. To optimize financial reporting processes within the holding company, the implementation of the SAP Financials module was initiated. The Audit Committee monitored the implementation process and also reviewed the Financial and Accounting Department's preparations for the introduction of the euro as the functional currency of the Republic of Bulgaria effective January 1, 2026.

2. Monitoring the effectiveness of internal control systems

The Audit Committee monitored the functioning of the internal control organization and the ongoing control and reporting procedures, as well as the audit firm's communication with internal control and the finance and accounting department. The Audit Committee accepts that during the reporting period, the internal control systems functioned at the level of the achieved internal control quality standards.

3. Monitoring the effectiveness of risk management systems

Ongoing risk management is carried out by the company's management. An Investment, Risk, and Sustainability Committee operates to assist the Board of Directors. With regard to risks, its primary activity is to analyze the existing risks facing Sirma Group Holding AD and its subsidiaries and to make proposals for minimizing their negative impact. Management believes that a detailed understanding and systematization of risks, their ongoing analysis, and timely management are essential to ensuring the company's successful operation. In discussions with management, the Audit Committee reviewed the monitoring of current risks and discussed the prospects for the development of risks and their expected impact on the company's operations in the near term. The company's management presents detailed

information on risks in the Management Report accompanying the annual financial statements.

4. Monitoring of the Independent Financial Audit at the Company

The independent financial audit of the financial statements of Sirma Group Holding AD for 2025 is being conducted for the seventh consecutive year by Grant Thornton Ltd., with Ms. Emilia Marinova serving as the registered auditor responsible for the audit. The Audit Committee's monitoring revealed that a favorable environment has been established for conducting the independent financial audit in collaboration with the company's management, the finance and accounting department, and the internal control system.

The audit reports confirm that the separate annual financial statements for 2025 and the consolidated annual financial statements for 2025 present a true and fair view of the company's financial position as of December 31, 2025, and the audit opinion expressed is consistent with the supplementary reports to the Audit Committee. The audit reports were prepared within the agreed deadlines.

The audit firm provided the Audit Committee with the supplementary reports on the separate and consolidated annual financial statements in accordance with Article 60, paragraphs 1 and 2, of the Independent Financial Audit Act and the assurance on sustainability. The reports noted that no significant deficiencies were identified in the company's internal financial control system or accounting system. Key audit matters were discussed with the Audit Committee and management during the audit.

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

The Audit Committee reviewed the Independence Statements of the audit firm Grant Thornton Ltd. and the responsible auditor, submitted at the commencement of the financial audit during the audit planning phase, and satisfied itself with the independence of the audit firm and the responsible auditor. The Audit Committee noted that the audit firm fulfills its obligation to publish a transparency report on its website, which includes the information required by law. The Audit Committee requested information on whether the audit firm provides additional services, in addition to financial audit services for the audited entity, and received assurance from the management of the audited entity that there is no agreement to provide additional services and that none are being provided; furthermore, the audit firm declares that no other services are being provided beyond the financial audit. Furthermore,

the Audit Committee notes that in the additional reports, the registered auditor has again declared its independence from the audited entity.

As a result of all this, the Audit Committee found no violation of the requirements of the Law on Independent Financial Audit and Assurance and the Code of Ethics for Professional Accountants of the International Ethics Standards Board for Accountants regarding independence, and confirmed the independence of the audit firm and the registered auditor responsible for the audit from the audited entity.

This report was adopted at a meeting of the Audit Committee No. 6/ April 30, 2026.

Sofia, April 30, 2026

Signed by Angel Kraichev – Chairman of the Audit Committee