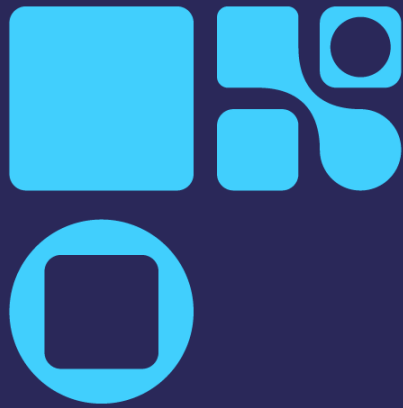




Sustainability Policy



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General

Definition of sustainability

"Sirma Group Holding" JSC and its subsidiaries (Sirma, the Group, the Company) consider sustainability as the basis for their activity.

Sirma adopts the definition of sustainability given by the United Nations World Commission on Environment and Development: *"meeting the needs of the present without compromising the ability of future generations to meet their own needs, by striking a balance between economic growth, environmental protection, and social well-being"*.

Contribution to the United Nations Sustainable Development Goals

The definition of sustainability adopted above finds its operational expression in the United Nations 2030 Agenda for Sustainable Development and the seventeen Sustainable Development Goals (SDGs) established under it. Sirma recognises the SDGs as the common international framework through which the contribution of business to sustainable development is understood, compared and held to account.

Sirma does not claim to contribute to all seventeen Goals. As a business-to-business provider of software and IT services, the Group's activity bears meaningfully on a defined subset of them. Sirma has therefore mapped its material sustainability topics, the commitments made in this Policy and its established practices against the Goals and targets on which it has a genuine and demonstrable

effect. Where a contribution is made indirectly — through the solutions Sirma builds for its clients rather than through its own operations — this is stated as such.

The Goals to which Sirma contributes, and the means by which it does so, are:

Goal	Target	Sirma's contribution
SDG 1 No Poverty	1.3, 1.4	<i>Indirect contribution.</i> Sirma develops and implements payment and other digital platforms through which the end users of its clients — including persons with no or limited access to financial, health and administrative services — gain access to those services.
SDG 3 Good Health and Well-being	3.4, 3.8	Sirma provides all employees with mandatory preventive medical examinations, supplementary health insurance and access to free physical and recreational activities, and monitors take-up, workplace accidents and satisfaction with working conditions. Through Sirma Medical Systems the Group also develops telehealth and chronic-disease management applications, including for diabetes, which extend access to health monitoring for their users.
SDG 4 Quality Education	4.3, 4.4	Through Sirma Academy, the Group provides structured technical and digital training to its own employees and to external participants, including students, partners and clients. Training content is maintained and expanded annually, with emphasis on artificial intelligence and practical digital skills, and is delivered in online, hybrid and asynchronous formats.
SDG 5 Gender Equality	5.1, 5.5	Sirma applies anti-discrimination policies, monitors the ratio of men to women across the Group and at management level, measures the difference between the average remuneration of men and women, and sets annual targets for reducing it.

Goal	Target	Sirma's contribution
SDG 7 Affordable and Clean Energy	7.2, 7.3	Sirma produces electricity from its own photovoltaic installation for consumption at the Group's headquarters, invests in the supporting electrical infrastructure, and carries out a continuing programme of energy-efficiency renovation of its building stock.
SDG 8 Decent Work and Economic Growth	8.5, 8.8	All persons working for Sirma are engaged under lawful employment, management or civil contracts, with defined working hours, social security and health coverage. The Group maintains remuneration above the average for the IT sector in the markets where it operates, provides preventive medical examinations, and monitors workplace accidents, employee complaints and satisfaction with working conditions.
SDG 9 Industry, Innovation and Infrastructure	9.4, 9.5	Sirma's core activity is the development and integration of software that enables client organisations to modernise their processes, improve efficiency and reduce resource intensity. The Group invests continuously in research and development, with emphasis on enterprise artificial intelligence.
SDG 10 Reduced Inequalities	10.2	Sirma promotes the inclusion of employees of different nationalities and of people with disabilities, and applies policies preventing discrimination in recruitment, remuneration and advancement.
SDG 12 Responsible Consumption and Production	12.5	Sirma operates the hardware it uses over an extended service life and applies a waste hierarchy of reuse, donation and recycling to equipment withdrawn from use, in accordance with its Waste Management Policy and the requirements applicable to waste electrical and electronic equipment.

Goal	Target	Sirma's contribution
SDG 13 Climate Action	13.2, 13.3	Sirma measures and discloses its Scope 1 and Scope 2 greenhouse gas emissions, monitors the carbon intensity of its operations per unit of revenue and per employee, renews its vehicle fleet with hybrid and electric vehicles, and maintains a certified environmental management system under ISO 14001.
SDG 16 Peace, Justice and Strong Institutions	16.5	Sirma maintains an Anti-Corruption Policy, an Ethical Code of Conduct and Internal Rules for the protection of whistleblowers, together with channels for reporting irregularities and protection against retaliation, and reports annually on signals received and cases identified.

The Group's contribution to these Goals is reviewed annually as part of the Sustainability Due Diligence, and is reported, together with the corresponding quantitative indicators for the year, in the "Annual Sustainability Report". Responsibility for maintaining this mapping and for reporting against it rests with the Sustainability Director, under the Investment, Risk and Sustainability Committee.

Sirma will keep the mapping under annual review and will add or withdraw Goals as its activities, its material topics and its measurable results change.

Legal framework

Sirma's sustainability policy is in compliance with the requirements of Regulation 2020/852 adopted by the EP regarding the taxonomy of sustainability, the Corporate Sustainability Reporting Directive (CSRD – successor to the Non-Financial Reporting Directive), the European Sustainability Reporting Standards (ESRS) applicable to it, and their transposition into Bulgarian legislation.

Due Diligence of Sustainability Topics

Under the guidance of the "Committee on Sustainability", Sirma underwent a due diligence process on sustainability topics, as defined in the ESRS. In this process, the different topics, Sirma's impact, the associated risks and opportunities were analyzed. This analysis identifies the material sustainability topics for Sirma.

Various KPIs were then defined for the purpose of their management. Measuring, analyzing and disclosing the values of these indicators makes it possible to manage the material topics for Sirma – reducing negative impacts, reducing the impact of risks and making the most of the opportunities related to the sustainability topics. This process and its results are documented in the “Sirma’s Methodology for Sustainability Due Diligence”.

The due diligence will be carried out annually, so that its results may be revised according to the changing environment and requirements.

Risks and opportunities

Each year Sirma conducts a due diligence review of the Company's material sustainability topics, their impacts, risks and opportunities. The identified material topics and their associated impacts, risks and opportunities are described in detail in the "Sustainability Due Diligence Methodology".

By implementing the Sustainability Policy (the Policy), Sirma **manages** the material topics of sustainability, **reduces the negative impact**, reduces the negative effect of various **risks** that could threaten the Group's activities and outlines various **opportunities** related to sustainability. By implementing the Policy, the Group while developing sustainably also helps to protect the natural environment, develops the social environment and seeks the realization of various opportunities related to sustainability topics.

In addition, the implementation of the Policy **reduces costs** related to realized risks (e.g. preventing the loss of quality qualified employees), as well as leads to a **direct economic/financial effect** (e.g. production of cheap and sustainable electricity from renewable sources).

Elements of sustainability

Sirma identifies the following main components of its sustainable development (ranked in descending order of their double materiality for the Group):

- Economic sustainability
- Social sustainability, which includes:
 - Employee resilience (internal sustainability)
 - Sustainability along the value chain (external sustainability)
- Governance sustainability
- Sustainability of the ecological footprint of the activity

ECONOMIC SUSTAINABILITY

Sirma was created to perform a specific economic activity, satisfy specific customer needs and achieve a positive financial result. The financial and economic sustainability of the Company **is the basis** for all other forms of sustainability (as described in the definition of sustainability by the UN as stated above). An economically strong company has the opportunity to improve its environmental practices, develop its social program and improve its governance.

Sirma mainly performs “IT services” and “Software development” for its corporate clients (B2B) from various verticals. Through this activity, Sirma helps client organizations to achieve and/or develop their digitalization.

Our Commitment

“We are committed to accumulating knowledge about Sirma's various verticals of specialization, which, in combination with the most modern and innovative technological solutions, will help us transform various processes, activities and entire industries for the benefit of our clients and their end users.”

Sirma

Steps to achieving this commitment

At Sirma, we believe that the digitalization we provide to our clients (our impact) leads to **sustainability and added value** for them and their activity:

- increasing the **efficiency** of each activity, by optimizing work processes of our clients;
- improving **working conditions**, by eliminating routine and repetitive operations and providing the opportunity for our clients' employees to focus their efforts on high-value-added activities;
- **reducing the negative environmental footprint** of their activities by reducing and eventually eliminating the need to use paper, reducing the energy required to perform digitalized activities and reducing and eventually eliminating the need to purchase hardware (through our cloud services and data center).

In this way, Sirma **impacts** its clients to become more sustainable and competitive, which in turn contributes to minimizing all risks associated with the economic sustainability. The increased sustainability of our clients as a result of Sirma's activities also ensures the sustainability of new orders for our products and services.

Material topic

“Clients and end users” is a doubly material topic for Sirma.

Measurement and management of the economic sustainability

Sirma **measures** its economic sustainability using various indicators, among which:

- sales revenue;
- EBITDA;
- Net profit;
- Number of new orders and returning customers;
- Other KPIs and ratios.

The results of the measurement of these indicators are analyzed for the purpose of operational management of the economic activity of Sirma. Data from this evaluation is published in the quarterly and annual financial reports of the company.

SOCIAL SUSTAINABILITY

ENVIRONMENT

A sustainable natural environment is crucial for Sirma’s overall long-term sustainability. The company strives to measure, control and reduce the negative impact that its activities have on nature. At Sirma, we are convinced that a responsible attitude towards our surroundings should not collide with economic development and/or the social contribution of our activities. Quite the opposite – these three types of impact must be balanced in order to achieve true corporate sustainability.

Sustainable practices such as producing our own energy from renewable sources, energy-efficient hardware, cloud computing and responsible management of e-waste minimize environmental impact while optimizing operational efficiency and increasing competitiveness. This not only corresponds to the growing consumer demand for environmentally friendly businesses, but also improves corporate reputation and compliance with environmental regulations. In addition, environmental sustainability can lead to cost savings and improved brand perception among environmentally conscious stakeholders.

The sustainability due diligence in Sirma (see Sustainability Due Diligence Methodology) has proven the following **negative impacts** of the Company's activities on the natural environment:

- Greenhouse gases generated from fossil fuel energy used

- Generation of electronic waste
- Water consumption

The identified impact and material **risks and opportunities** related to the sustainability of the natural environment are updated annually through the application of the “Sustainability Due Diligence Methodology”.

Our commitment

“We will make every effort to minimize the negative impact of our activities in terms of energy use, e-waste and water consumption.”

Sirma

Steps to achieving this commitment

Sirma will achieve this commitment by:

- maintenance and improvement of energy-efficient offices;
- minimizing the amount of paper used and its use in Sirma's offices only when this is a regulatory/legal requirement;
- full implementation and maximum evaluations of all recommended practices for energy efficiency of the Sirma Data Center, according to the European Code of Conduct on Data Center Energy Efficiency;
- reducing e-waste and achieving complete recycling of hardware that has gone out of use;
- improving energy efficiency;
- increasing the use of electricity from (own) renewable sources;
- maintenance of the system that allows the remote work of Group employees;
- limiting trips that use carbon fuels;
- encouraging remote video-conferences;
- ensuring that the positions on climate and energy policy taken by the industry associations and business organisations in which Sirma participates are consistent with Sirma's own climate commitments;
- refraining from funding, supporting or participating in advocacy that opposes climate legislation or the objectives of the Paris Agreement and the EU Climate Law (Regulation (EU) 2021/1119).

In this way, we believe that we will contribute to reducing the negative impact of our activities on the natural

environment and reduce the identified risks associated with this.

Climate advocacy and industry participation

Sirma supports the objectives of the Paris Agreement and of the EU Climate Law (Regulation (EU) 2021/1119) and expects the industry associations and business organisations in which it participates to hold positions consistent with those objectives. Sirma does not fund, support or take part in advocacy that opposes climate legislation.

Sirma participates directly in the governing bodies of the organisations of which it is a member. The Chief Executive Officer of "Sirma Group Holding" JSC is a member of the Board of Directors of the Bulgarian Association of Software Companies (BASSCOM), and the Investor Relations and Sustainability Director is a member of the Sustainability Committee of the British-Bulgarian Chamber of Commerce, where energy consumption, emissions and climate-related disclosure are among the matters addressed. Sirma also participates in the Green Finance and Energy Center, whose work on sustainable finance and the energy transition is consistent with Sirma's climate commitments. This representation provides Sirma with direct visibility of, and an active voice in, the positions these organisations adopt on climate and energy matters.

Where an association of which Sirma is a member adopts a position inconsistent with Sirma's climate commitments, Sirma will raise the matter within that organisation and, if the inconsistency persists, will reconsider its membership.

Material Topics

The Sustainability Due Diligence has determined two environmental topics which have material impact, risks and opportunities for Sirma:

- E-waste management
- Combating climate change

Measurement and management

We **measure** the sustainability of Sirma's environmental impact by:

- the percentage share of recycled unnecessary hardware, aiming for the achievement of full recycling;
- the amount of electricity used per employee;
- the percentage share of used electricity that is produced from renewable sources;
- the amount and percentage share of used electricity that is produced from its own renewable sources;
- the number of days of business trips of Sirma employees related to the total number of employees;
- number of official vehicles and their annual mileage;
- number of environmental initiatives for Sirma employees;
- on other KPIs as detailed in the Methodology for Sustainability Due Diligence.

The results of the measurement of these indicators are analyzed for the purpose of operational management of environmental impact, risks and opportunities. Data from this measurement are published in the "Annual Sustainability Report".

SUSTAINABLE GOVERNANCE

At Sirma we believe that sustainable corporate governance is the glue between all other elements of sustainability.

To protect good practices and impact, as well as to overcome the risks associated with the lack of sustainable governance, and benefit from its opportunities, Sirma has developed a system of instructions, policies, procedures and codes. The latter are absolutely mandatory for compliance by all employees of the Group. These documents are published on the website www.sirma.com.

Our commitment

"Sirma is committed to building and continuously improving an ethical, transparent, secure and accountable management system and corporate culture."

Sirma

Steps to achieving this commitment

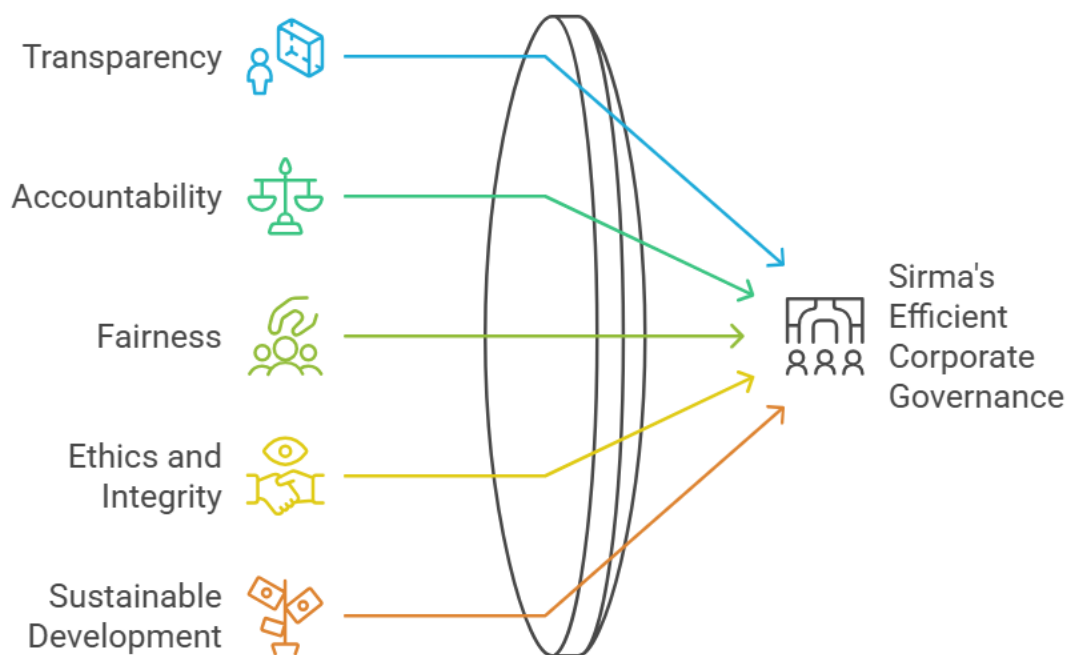
Sirma will achieve this commitment by following these steps:

- Building operations that are protected from corruption and related phenomena;
- Ensuring quality control of activities and results;
- Ensuring equal treatment of different categories of stakeholders;
- Protecting the Company from any form of discrimination that would violate social sustainability;
- Protection and control from abuse of inside information;
- Ensuring compliance and prevention of any sanctions from state and regulatory authorities;
- Cybersecurity and data protection of the Company and its customers;
- Compliance with the following principles of corporate governance.

Principles of corporate governance

Corporate governance principles are essential for the successful functioning of Sirma. They provide a framework for decision-making that is transparent, accountable and ethical. Adherence to these principles not only improves business management, but also strengthens stakeholder trust and builds a stable corporate culture, which are key to the sustainable development of the organization.

Principles of Corporate Governance of Sirma



1. Transparency

Transparency is a fundamental principle of corporate governance that requires that information about Sirma be easily accessible, timely, and understandable to all stakeholders. This includes financial statements, strategies, risks and other important aspects of the business. Transparency helps build trust between shareholders, employees and the public.

2. Accountability

Accountability is another important principle that requires managers and Board of directors to act in the best interests of the company and its shareholders. They should make decisions that benefit the long-term value of the company, not just short-term profits. Accountability also includes accountability for the actions and decisions that are taken.

3. Fairness

Fairness in corporate governance means that all shareholders and stakeholders should be treated equally. This includes protecting the rights of small shareholders and ensuring equal access to information. Fair governance is important for preventing conflicts of interest and promoting good practices.

4. Ethics and Integrity

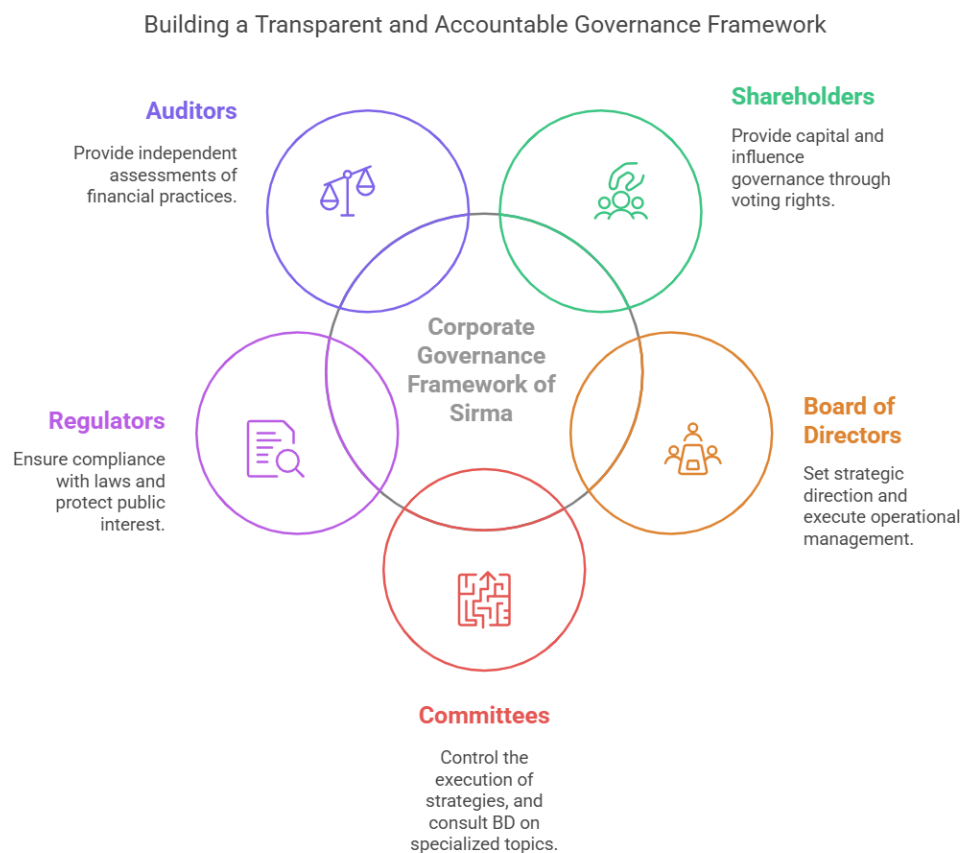
Ethics and integrity are fundamental principles that should guide the behavior of managers and employees. The corporate culture should promote honesty, integrity and responsibility. Compliance with ethical standards is essential for building a positive image of the company and maintaining trust among customers and partners.

5. Sustainable Development

Sustainable development is a principle that emphasizes the need for a balance between the economic, social and environmental aspects of business. Companies should strive to minimize their negative impact on the environment and contribute to social well-being. Sustainable management is key to the long-term success of business.

Driving Forces

The corporate governance system of Sirma (built on the above principles) organizes, directs and controls all processes in the Company. Its main driving forces and their discrete functions within this framework are:



Responsibility and control

The corporate governance framework of Sirma is under the direct control of the Board of Directors and the operational management of the Chief Operating Officer. The remuneration policy of the Board of Directors, which is adopted by the General Meeting of Shareholders, links the remuneration and bonuses of the Board of Directors to the achieved results.

The management system consists of a number of internal documents that help regulate a number of internal functions, with each group of documents having a designated coordinator, and he in turn – a department head, who is also a member of the Board of Directors, as follows:

- Internal documents related to the management of Sirma's **human potential** with the coordinator HR Director with the department head Chief Talent Management Director;
- Internal documents related to the **sustainable development** of Sirma with the coordinator Sustainable Development Director with the department head Chief Financial Officer;
- Internal documents related to **digital security** with the coordinator Cybersecurity Officer with the department head Chief Operating Officer;
- Internal documents related to **certification under various ISO standards** with a coordinator Responsible for Compliance with the department head Chief Operating Officer;
- The consistency of the positions taken by the industry associations and business organisations in which Sirma participates with the Group's climate commitments is reviewed annually by the Investment, Risk and Sustainability Committee, which reports the outcome to the Board of Directors.

The control over the implementation of the provisions of the internal documents of the companies and the results achieved is carried out by:

- Board of Directors of the companies in the Group;
- Audit Committee;
- External licensed auditor;
- General meeting of shareholders;
- External regulators.

Material topics

The sustainability due diligence identified two governance topics that are important for Sirma. The first one has a material score for its impact, risks and opportunities for the Group, and the second one, although not as highly scored, also remains important for the business:

- Shareholder Care

- Corporate Governance, Values and Dialogue

Measurement and sustainable governance

Sirma's sustainable governance is measured by the various indicators, some of which are:

- Absence of discrimination of employees of different genders - as a percentage ratio between male and female employees;
- Number of signals of corruption, bribery or other types of abuse, according to the Group's internal documents;
- Number of registered breaches in Sirma's digital security system;
- Number of sanctions imposed by the regulators of Sirma's activities and amount of fines;
- Strict compliance with the regulated deadlines for disclosing complete information on the company's development each quarter;
- other indicators defined in the Sustainability Methodology.

The results of the measurement of these indicators are analyzed in order to achieve sustainable operational governance. Data from this measurement are published in the "Annual Sustainability Report".

DISCLOSURE

Sirma discloses all information related to sustainability in its annual Sustainability Report as part of the annual Consolidated Reports and in accordance with regulatory requirements.

ADDITIONAL PROVISIONS

§1. This Policy was developed by the Board of Directors of "Sirma Group Holding" JSC and applied for execution from January 1, 2022.

§2. This Policy was updated on March 2, 2026, to include Sirma's commitment regarding the consistency of its climate position with the positions of the industry associations and business organisations in which it participates.

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