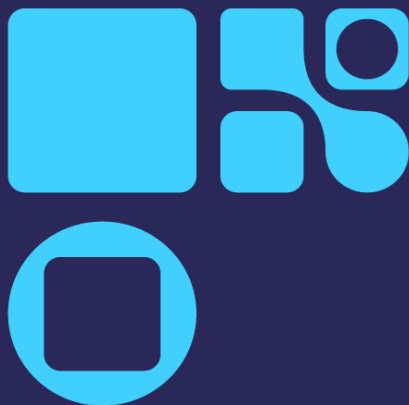


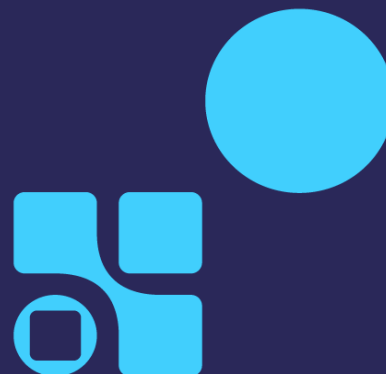


RULES OF OPERATION

OF THE BOARD OF DIRECTORS

**SIRMA GROUP JSC
AND ITS SUBSIDIARIES**

last updated on 18 June 2026



CONTENTS

Section I. General Provisions	2
Section II. Rights and Obligations of the Members of the Board of Directors	3
Section III. Status of the Members of the Board of Directors	5
Section IV. Guarantee for Good Management	5
Section V. Composition of the Board of Directors	5
Section VI. Activity of the Board of Directors.....	5
Section VII. Meetings of the Board of Directors	7
Section VIII. Representation and Management.....	10
Section IX. Functions of the Board of Directors	11
Section X. Property Rights of the Members of the Board of Directors	12
Section XI. Gifts.....	13
Section XII. Annual Reports	13
Section XIII. Obligation for Specific Reports of Sirma Group JSC	13
Section XIV. Transitional and Final Provisions.....	13

RULES OF OPERATION OF THE BOARD OF DIRECTORS OF SIRMA GROUP JSC AND ITS SUBSIDIARIES

Section I. General Provisions

- Art. 1.** (1) These Rules of Operation are adopted in accordance with Art. 42(1) of the Articles of Association of Sirma Group JSC and regulate the organisation and activities of the Board of Directors of the Company.
- (2) These Rules of Operation apply to the Boards of Directors of all subsidiaries of Sirma Group JSC.
- (3) The purpose of these Rules of Operation is to specify the rights and obligations of the members of the Board of Directors of Sirma Group JSC and to ensure the effective organisation of its work.
- (4) For brevity, these rules are hereinafter referred to as the “Rules”, Sirma Group JSC and its subsidiaries together as the “Group”, Sirma Group JSC and each of its subsidiaries individually as the “Company”, and the Board of Directors of each individual company as the “Board”.
- Art. 2.** (1) The Board of Directors of the Company is elected by the General Meeting of Shareholders for a term of up to two years.
- (2) The members of the Board may be re-elected without restriction.
- (3) The number of members of the Board of Directors, its composition, and the remuneration of the members who are not entrusted with management are determined by the General Meeting of Shareholders of the Company.
- (4) The members of the Board of Directors are elected through a transparent procedure which ensures, among other things, timely and sufficient information on the personal and professional qualities of the candidates.
- (5) After the expiry of their term of office, the members of the Board of Directors continue to perform their functions until a new Board is elected by the General Meeting of Shareholders.
- Art. 3.** (1) The Board of Directors consists of three to nine natural persons and/or legal entities. The composition of the Board of Directors may be changed by the General Meeting of Shareholders at any time.
- (2) If a member of the Board of Directors is a legal entity, it appoints a representative to perform its duties on the Board. The legal entity is jointly and severally liable, together with the other members of the Board, without limitation, for the obligations arising from the actions of its representatives.
- Art. 4.** (1) The members of the Board of Directors must hold a university degree and must not have been:
1. convicted of an intentional crime of a general nature;
 2. declared bankrupt as sole traders or as partners with unlimited liability in a commercial company, and must not be subject to bankruptcy proceedings;
 3. members of a management or supervisory body of a company or cooperative terminated due to bankruptcy during the two years preceding the date of the decision declaring bankruptcy, where there are unsatisfied creditors;
 4. deprived of the right to hold a position involving financial accountability.
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(2) Persons who, at the time of election, have been convicted by a final judgment of crimes against property, against the economy, or against the financial, tax or social security system, committed in the Republic of Bulgaria or abroad, may not be elected to the Board of Directors unless they have been rehabilitated.

(3) At least one third of the members of the Board of Directors must be independent. An independent member may not be:

1. an employee of the Company;
2. a shareholder who holds, directly or through related persons, at least 25 per cent of the votes in the General Meeting of Shareholders, or a person related to the Company;
3. a person who has a permanent commercial relationship with the Company;
4. a member of a management or supervisory body, a procurator or an employee of a commercial company or other legal entity under items 2 and 3;
5. a person related to another member of the Board of Directors.

(4) Persons elected as members of the Board of Directors in respect of whom, after the date of their election, circumstances under paragraphs 1 and 2 arise must immediately notify the Board of Directors. In this case, they cease to perform their functions and do not receive remuneration.

Section II. Rights and Obligations of the Members of the Board of Directors

Art. 5. The members of the Board of Directors must comply with the requirements of the Public Offering of Securities Act, the Commercial Act and the Articles of Association of the Company.

Art. 6. (1) The members of the Board of Directors must perform their functions with the care of a prudent businessperson, be loyal to the Company, and act in the best interest of its shareholders, including by:

1. performing their duties with the skill, diligence and responsibility expected of a professional and in a manner which they reasonably consider to be in the interest of all shareholders of the Company, using only information which they reasonably consider to be reliable, complete and timely;
2. giving priority to the interests of the Company and its investors over their own interests, and not using for the benefit of themselves or other persons, at the expense of the Company and its shareholders, facts and circumstances learned in the performance of their official and professional duties;
3. avoiding direct or indirect conflicts between their own interests and those of the Company and, where such conflicts arise, disclosing them promptly and in full, and neither participating in the decision-making in such cases nor influencing the other members of the Board;
4. not disclosing information on the deliberations and decisions of the meetings of the Board of Directors, or other non-public information about the Company, including after they cease to be members of the Board of Directors, until the relevant circumstances are publicly disclosed by the Company;

5. providing and disclosing information to shareholders and investors in accordance with the requirements of the statutory and internal acts of the Company.

(2) Paragraph 1 also applies to the natural persons who represent legal entities that are members of the Board of Directors, as well as to procurators.

Art. 7. (1) Each member of the Board of Directors receives a fixed monthly remuneration which may not exceed ten (10) times the minimum monthly wage for the country.

(2) In addition to the monthly remuneration under para. 1, the Chairman and the Deputy Chairman of the Board of Directors, as well as the executive directors and other members of the Board of Directors, may receive additional remuneration (tantiemes) determined on the basis of additionally adopted indicators, before the payment of dividends.

(3) The persons under para. 1 and 2 may receive remuneration of different amounts.

(4) The remuneration under para. 1 is paid monthly, in cash or by bank transfer, on the first working day of the month following the month for which it is due, and the remuneration under para. 2 – in the manner determined in the Remuneration Regulations of the Board of Directors.

Art. 8. (1) The members of the Board of Directors of Sirma Group JSC and the persons closely associated with them notify the Financial Supervision Commission and Sirma Group JSC in writing, in accordance with Art. 19 of Regulation (EU) No 596/2014, of transactions conducted on their own account in shares issued by Sirma Group JSC which are admitted to trading on a regulated market, or in derivatives or other financial instruments linked to those shares, where the value of these transactions exceeds EUR 20,000 within one calendar year. The notification is made within 3 working days of the conclusion of the transaction by which the threshold is crossed.

(2) The notification under para. 1 is submitted using the form approved by the FSC, which is downloaded from its website, and contains at least:

1. the full names of the member of the Board of Directors and of the person closely associated with him or her;
2. the reason for the notification;
3. the name of Sirma Group JSC;
4. a description of the financial instruments which are the subject of the transaction;
5. the type of transaction (acquisition or disposal);
6. the date and place of the transaction;
7. the price and number of the financial instruments which are the subject of the transaction.

(3) During the 30 calendar days before the announcement of an interim financial report or a year-end report of Sirma Group JSC (the closed period), the members of the Board of Directors and the persons closely associated with them may not conduct any transactions on their own account or for the account of a third party in the shares of Sirma Group JSC or in financial instruments linked to them (Art. 19(11) of Regulation (EU) No 596/2014), except in the cases permitted under Art. 19(12) of that Regulation and the acts implementing it.

Art. 9. The Board of Directors must ensure that shareholders and the investment community receive regular and timely disclosure of information on the major corporate events relating to the activities and condition of the Company.

Section III. Status of the Members of the Board of Directors

Art. 10. (1) The members of the Board of Directors have equal rights and obligations, regardless of the internal distribution of functions among them and of the additional management and representation rights and obligations of the CEO (the executive member).

(2) The members of the Board of Directors must perform their duties in the interest of the Company and keep all its secrets during their term of office.

(3) The members of the Board of Directors are jointly and severally liable for damage caused to the Company through their fault. Any member of the Board may be released from liability if it is established that he or she is not at fault for the damage caused.

Section IV. Guarantee for Good Management

Art. 11. (1) The members of the Board of Directors give a guarantee for the term of their management in the amount of three (3) initial monthly gross remunerations.

(2) Under the management contracts, the members of the Board of Directors guarantee to the Company by signing a promissory note.

(3) The promissory note is returned to the relevant member upon termination of his or her membership of the Board and his or her release from liability in this connection.

Section V. Composition of the Board of Directors

Art. 12. For the better organisation of their work, the members of the Board of Directors elect from among themselves a Chairman, a Deputy Chairman and one executive member (the CEO).

Art. 13. (1) The CEO represents the Company. The CEO's authorisation may be withdrawn at any time by decision of the Board of Directors. The Company may also be represented by two procurators acting jointly.

(2) The names of the persons authorised to represent the Company are entered in the Commercial Register and published.

Section VI. Activity of the Board of Directors

Rights and obligations

Art. 14. (1) The Board of Directors organises, directs and controls the activities of the Company and resolves all matters related to them, except those within the exclusive competence of the General Meeting of Shareholders and of the CEO.

(2) The Board of Directors:

1. governs and manages the property of the Company with the care of a prudent businessperson;
2. organises, within 7 (seven) days of the arising of the relevant grounds, the preparation and filing with the competent court of the documents required for

- the entry in the Commercial Register of the circumstances subject to entry which concern the Company;
3. develops and presents to the annual General Meeting of Shareholders business programmes and plans for the entire term of office of the Board of Directors and specifically for each year;
 4. prepares and presents to the annual General Meeting of Shareholders the annual financial statements and the report on the activities for the past financial year, and publishes them after their adoption;
 5. determines and approves the organisational and management structure of the Company in accordance with the applicable regulations;
 6. adopts the internal organisational acts of the Company, such as remuneration rules, internal labour regulations, etc.;
 7. decides on the appointment and dismissal of the chief accountant of the Company and of the heads of the main departments (directorates, units);
 8. elects and dismisses the CEO;
 9. entrusts the CEO, by a management contract, with the immediate organisation of the management and representation of the Company;
 10. determines the remuneration of the CEO within the remuneration set by the General Meeting of Shareholders;
 11. disposes of the tangible assets of the Company;
 12. decides on entering into loan agreements for the Company, as well as on the creation of mortgages, pledges or other security;
 13. decides on the formation of cash funds and determines the procedure for their accumulation and spending;
 14. organises and prepares the meetings of the General Meeting of Shareholders of the Company and makes proposals for their agenda;
 15. decides on participation in, or disposal of participations in, other corporate legal entities;
 16. decides on the provision of guarantees in favour of third parties;
 17. decides on entering into loan agreements with third parties as borrowers;
 18. decides on the opening of representative offices of the Company;
 19. oversees the identification and management of sustainability impacts, risks and opportunities, receives reports from the Investments, Risk and Sustainability Committee, and approves the Sustainability Report;
 20. decides on all other matters in line with its rights and obligations under the applicable legislation and the Articles of Association of the Company.
- (3) In its activities the Board of Directors is assisted by committees and commissions defined in the management structure adopted by the Board of Directors.
- (4) The Board has the Remuneration Committee, the Information Disclosure Committee and the Investments, Risk and Sustainability Committee. The Audit Committee is elected by the General Meeting of Shareholders on the proposal of the Board of Directors pursuant to Art. 107 of the Independent Financial Audit and Sustainability Assurance Act. The composition, powers and accountability of the

committees are set out in their charters; their chairpersons report on their activities to the Board of Directors.

Prohibited activity

Art. 15. The Board of Directors may not carry out disposal transactions or other actions for which, under the Articles of Association or the law, the prior decision of the General Meeting of Shareholders of the Company is required.

Incompatibility

Art. 16. (1) The members of the Board of Directors, or those representing them under Art. 234 of the Commercial Act, may not, during their term of office:

- a) be sentenced to imprisonment for an intentional crime of a general nature;
- b) be declared bankrupt, or be members of a management or supervisory body or partners with unlimited liability in a company dissolved due to bankruptcy, where there are unsatisfied creditors;
- c) be spouses or relatives in the direct line or in the collateral line up to the third degree, or relatives by marriage up to the third degree inclusive, of another member of the Board;
- d) fail to meet other requirements of the law or the Articles of Association.

(2) Where an incompatibility arises, the relevant member (representative) must immediately tender his or her resignation as a member of the Board. If he or she fails to do so, the Board of Directors proposes to the General Meeting of Shareholders that his or her rights as a member of the Board be terminated, and where the person concerned is a representative of a legal entity, the Board of Directors proposes that the legal entity immediately replace its representative on the Board.

Section VII. Meetings of the Board of Directors

Schedule of meetings

Art. 17. (1) The Board of Directors holds regular meetings.

(2) The Board meets at least once a month.

(3) Extraordinary meetings may be convened at the request of any member of the Board of Directors.

(4) Meetings are held at the building in which the registered management address of the Company is located. The Board may hold a meeting at another place if it so decides. Meetings may also be held remotely by video or telephone conference in which all participants can hear one another in real time (an online meeting); participation in this way counts as presence. The invitation to an online meeting contains the joining link and is sent under Art. 18; under Art. 42(4) of the Articles of Association, notices may also be sent by communication on the Internet.

(5) For each meeting, the Board of Directors designates, where possible at its previous meeting, a rapporteur for the items on the agenda. The rapporteur prepares written information, which is sent to the members of the Board together with the invitation to the meeting.

(6) Meetings of the Board of Directors are closed, unless the Board decides otherwise.

Convening of meetings

- Art. 18.** (1) Meetings are convened by the Chairman of the Board of Directors. Any member of the Board of Directors may ask the Chairman to convene a meeting to discuss particular matters. In this case, the Chairman must convene the meeting no later than 3 days after receipt of the request (Art. 42(3) of the Articles of Association).
- (2) Notices convening a meeting are sent in writing or by communication on the Internet and must be received by the members at least 24 hours before the meeting (Art. 42(4) of the Articles of Association). The notice must state the place, date and time of the meeting and the proposed agenda.
- (3) Notice of a meeting is not required for members who were present at the previous meeting of the Board of Directors, if they were informed there of the place, date, time and agenda of the next meeting. Members who were absent are notified in accordance with para. 1 and 2.
- (4) Any member of the Board of Directors may request from the Chairman or from the other members of the Board the materials needed on the matters to be discussed at the forthcoming meeting.

Quorum

- Art. 19.** (1) A meeting is valid if more than 50% of the members are present.
- (2) If there is no quorum, a new meeting is scheduled within 1 (one) week.
- (3) The members of the Board of Directors present at the meeting are recorded in the minutes of the meeting.

Representation at meetings

- Art. 20.** (1) Any member of the Board of Directors may be represented at a meeting of the Board by another member authorised for this purpose. A member present may not represent more than one absent member (Art. 39(2) of the Articles of Association).
- (2) The authorisation must be in writing. A copy of it, certified by the authorised member, is attached to the minutes of the meeting.
- (3) The minutes of the meeting expressly record which member of the Board represents whom.

Majority for decision-making

- Art. 21.** (1) The Board of Directors takes its decisions by a majority of more than half of the members present.
- (2) The Board of Directors takes its decisions unanimously where this is provided for by law or by the Articles of Association of the Company.
- (3) A member of the Board of Directors may not vote, in person or through a representative, on a decision concerning:
- the bringing of a claim against him or her;
 - actions to enforce his or her liability to the Company.

Decision-making without a meeting

- Art. 22.** (1) The Board of Directors may take decisions on a given matter without a meeting, if all its members have expressed their consent in writing (Art. 39(3) of the Articles of Association).

(2) The decision is deemed to have been taken once the minutes of the decision-making without a meeting have been signed by all members of the Board, who by their signature declare their consent to the decision (Art. 42(7) of the Articles of Association).

(3) The decision-making without a meeting is organised by the Chairman of the Board.

Entry into force of decisions

Art. 23. (1) The decisions of the Board of Directors enter into force immediately upon their adoption, unless their effect is expressly deferred.

(2) The decisions of the Board are numbered consecutively for each meeting.

Minutes

Art. 24. (1) Minutes are kept at the meetings of the Board of Directors, stating:

- a) the place and time of the meeting;
- b) the names of the members of the Board present, of the members represented and of their representatives;
- c) the external persons present;
- d) the agenda;
- e) the proposed decisions;
- f) the votes held, their results and the decisions taken.

(2) The minutes are drawn up within 7 (seven) days of the meeting and are signed by all members of the Board present at the meeting.

(3) The written materials submitted for discussion, the powers of attorney for the representation of members of the Board and any written opinions of members on the agenda items are attached to the minutes.

(4) The originals of the minutes, with all their annexes, are kept by the Chairman of the Board of Directors or by a person designated by the Board of Directors.

(5) Copies of the minutes of the Board are provided to its members ex officio immediately after the minutes have been drawn up.

(6) The finished minutes are arranged in a minutes register (book), which is certified annually by the Chairman of the Board. The minutes and their annexes are kept for 10 (ten) years from the date of the meeting.

Art. 25. The minutes of the meetings of the Board constitute a trade secret. Facts and circumstances from them may be published, disclosed or communicated to third parties only by decision of the Board of Directors, or where a statutory act so requires.

Minute-taker

Art. 26. (1) The Board of Directors may elect a minute-taker to keep the minutes of the meetings and to prepare copies and extracts from them.

(2) The minute-taker is responsible for the printing of the minutes, for the necessary extracts of the decisions, and for delivering these decisions to the persons concerned.

(3) The costs of preparing, printing and copying the minutes and the extracts from them are borne by the Company.

Provision of information for meetings

- Art. 27.** (1) The matters submitted to the Board of Directors for decision are considered on the basis of written information prepared by the submitting party and provided within an appropriate period before the date of the meeting.
- (2) Given the nature of the matters under consideration, employees of the Company and other persons (experts, etc.) whose official competence relates to the matters discussed by the Board may attend the meetings.

Section VIII. Representation and Management

Representation of the Company

- Art. 28.** (1) The Company is managed and represented by the Board of Directors.
- (2) The Board allocates functions among its members, takes decisions and entrusts their implementation to its members.
- (3) The Company is represented before third parties by its CEO.

Chairman and Deputy Chairman of the Board of Directors

- Art. 29.** (1) The Chairman of the Board of Directors:
- a) leads the preparation and conduct of the meetings of the Board;
 - b) convenes the meetings of the Board;
 - c) prepares the agenda of the meetings of the Board, brings it to the attention of the members of the Board and submits for consideration the materials on it prepared by the rapporteurs designated in advance by the Board;
 - d) receives, processes and summarises the proposals submitted by the members of the Board and gives an opinion on them;
 - e) keeps a record of the decisions taken at the meetings of the Board and coordinates and supervises their implementation;
 - f) sends the executive member of the Board on business trips in the country and abroad;
 - g) performs other functions provided for by the law or the Articles of Association.
- (2) The Deputy Chairman of the Board of Directors replaces the Chairman when the Chairman is absent or otherwise unable to perform his or her functions. In that case the Deputy Chairman exercises all functions of the Chairman under these Rules, the Articles of Association and the decisions of the Board of Directors, and every reference in these Rules to the Chairman is read as a reference to the Deputy Chairman.

CEO

- Art. 30.** The executive member (the CEO) represents the Company before third parties and organises its immediate management.

Management contract

- Art. 31.** (1) The CEO carries out his or her activities on the basis of a management contract signed between him or her and the Company, represented by the Chairman of the Board of Directors.
- (2) The management contract contains:
- a) the tasks of the CEO;

- b) the rights and obligations of the CEO;
- c) the financial incentives for, and the responsibility of, the executive member;
- d) the possibilities for terminating the management contract and the consequences thereof.

Powers of the CEO

Art. 32. (1) The CEO:

- a) organises, directs and controls the overall activities of the Company in accordance with the applicable legislation, the decisions of the Board of Directors, the Articles of Association of the Company and these Rules;
- b) ensures the management and safeguarding of the property of the Company;
- c) exercises the rights of an employer in respect of the persons employed by the Company under an employment relationship;
- d) concludes transactions on behalf of the Company and informs the Board of Directors thereof (in the manner specified in the Articles of Association and in the decisions of the Board of Directors);
- e) represents the Company before state and municipal authorities and before all other natural persons and legal entities;
- f) immediately reports to the Chairman of the Board of Directors any circumstance of material importance for the Company and, where necessary, proposes that a meeting of the Board of Directors be convened;
- g) resolves all other tasks arising from the law, the Articles of Association and the decisions of the Board of Directors.

(2) Where the CEO is unable to exercise his or her rights and perform his or her obligations, they are assumed by the Chairman of the Board of Directors.

Section IX. Functions of the Board of Directors

Art. 33. (1) The Board of Directors is a collective body for the management of the Company. It is accountable for its activities to the General Meeting of Shareholders of the Company.

(2) The Board carries out its activities in accordance with the requirements of the applicable legislation and the Articles of Association of the Company.

(3) The allocation of powers between the General Meeting of Shareholders, the Board of Directors and the CEO is summarised in the table below. The table is for reference; in case of divergence, the law and the Articles of Association prevail.

Matter	Decided by	Basis
Amendment of the Articles of Association; increase and decrease of capital; conversion and termination of the Company	General Meeting of Shareholders	Articles, Art. 24(1)–(3)
Number, election and release of the Board members; their remuneration; discharge from liability	General Meeting of Shareholders	Articles, Art. 24(4), (5) and (10); Art. 43(1)
Annual financial statements and distribution of profit; election of registered auditors	General Meeting of Shareholders	Articles, Art. 24(6) and (7); Art. 51

Matter	Decided by	Basis
Closure or transfer of companies; significant change of activity (unanimously); organisational changes; long-term cooperation; branches and offices; annual business programme; investments; prospectuses	Board of Directors	Articles, Art. 40(1)(1)–(6), (13) and (14)
Credit agreements and security; acquisition and disposal of real estate and shareholdings; pledges and mortgages	Board of Directors (unanimously where the value exceeds half of the assets under the latest audited statements)	Articles, Art. 40(1)(7) and (8); Rules, Art. 14(2)11, 12 and 15–17
Election and dismissal of the CEO and procurators; adoption of these Rules	Board of Directors	Articles, Art. 40(1)(9) and Art. 42(1); Rules, Art. 14(2)8
Remuneration of the CEO	Board of Directors	Articles, Art. 43(2); Rules, Art. 14(2)10
Operational management; implementation of Board decisions; employment relationships; transactions and representation before third parties	CEO	Articles, Art. 44; Rules, Art. 28(3) and 32

Section X. Property Rights of the Members of the Board of Directors

Business trips of the members of the Board of Directors

- Art. 34.** (1) The members of the Board of Directors are sent on business trips in the country by the CEO, and the CEO by the Chairman of the Board.
- (2) The members of the Board of Directors are sent on business trips abroad on the basis of a decision of the Board of Directors for each individual case.
- (3) Members of the Board of Directors who do not live in the town where the relevant meeting of the Board is held are paid a travel allowance for it.
- (4) The costs of the business trips of the members of the Board of Directors are borne by the Company.

Use of Company property

- Art. 35.** In the performance of their functions, the members of the Board of Directors may use the property of the Company, including a company mobile phone and a company car.

Financial costs

- Art. 36.** (1) To carry out its activities, the Board of Directors is entitled to incur financial costs within the limits of the management costs of the Company approved by it.
- (2) For their work, the members of the Board receive remuneration at the expense of the Company, as determined by the General Meeting of Shareholders.

Section XI. Gifts

- Art. 37.** (1) The members of the Board of Directors are entitled to receive freely promotional materials and souvenirs from third parties – companies and organisations with which the Company has contractual relations.
- (2) The members of the Board of Directors are entitled to receive freely promotional materials and souvenirs from persons related to the Company.
- (3) The members of the Board of Directors are not entitled to receive other types of gifts from third parties – companies and organisations with which the Company has contractual relations – or from persons related to the Company.

Section XII. Annual Reports

- Art. 38.** (1) By the end of February each year, the Board of Directors of Sirma Group JSC must prepare the annual financial statements and the annual activity report for the past calendar year, and present them to the registered auditors elected by the General Meeting of Shareholders (Art. 45(1) of the Articles of Association). The consolidated annual financial statements and the consolidated activity report, which includes a separate section on sustainability matters (the sustainability report), are prepared and presented to the auditors within a period that allows their disclosure within the deadline set in Art. 100n(2) of the Public Offering of Securities Act.
- (2) After receiving the reports of the registered auditors, the Board of Directors presents to the General Meeting of Shareholders the financial statements – individual and consolidated – the report on the activities and the auditors' reports.
- (3) The report on the activities describes the course of the activities and the condition of Sirma Group JSC and of the companies in the Group, and explains the annual financial statements. The report also contains other information required by the applicable regulations.

Section XIII. Obligation for Specific Reports of Sirma Group JSC

- Art. 39.** (1) Sirma Group JSC submits to the FSC and to the regulated market the annual and interim individual and consolidated financial statements, as well as the public notifications on its financial position, with the content and within the time limits provided for in Art. 100n, 100o and 100o1 of the Public Offering of Securities Act and the acts on its implementation. Sirma Group JSC provides the FSC and other authorised bodies and organisations with other information required under the applicable legislation.
- (2) Sirma Group JSC publishes a notice of the submission of the reports and of the place, manner and time for inspecting them within 7 days of their submission.

Section XIV. Transitional and Final Provisions

- § 1. All amendments and additions to these Rules enter into force on the day after the meeting of the Board of Directors at which they were made, unless the Board decides otherwise.
- § 2. These Rules are interpreted by the Board of Directors itself.

- § 3. Matters not covered by these Rules are governed by the relevant provisions of Bulgarian legislation and of the Articles of Association of the Company.
- § 4. These Rules are adopted on the basis of Art. 244(2) of the Commercial Act and Art. 42(1) of the Articles of Association of Sirma Group JSC by a decision of 28 May 2014 of the Board of Directors. The Rules were amended by a decision of the Board of Directors of 20 March 2024 in connection with the change of the Investments, Risk and Sustainability Committee (Art. 14(2)19).
- § 5. The name of the Company in these Rules was updated to Sirma Group JSC pursuant to a resolution of the General Meeting of Shareholders of 18.06.2026.

Amendment history

Date	Decision	Amendment
28 May 2014	Board of Directors decision	Adoption of the Rules
20 Mar 2024	Board of Directors decision	Investments, Risk and Sustainability Committee (Art. 14(2)19)
18 Jun 2026	Resolution of the General Meeting of Shareholders	Change of the Company name to Sirma Group JSC (§ 5)

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