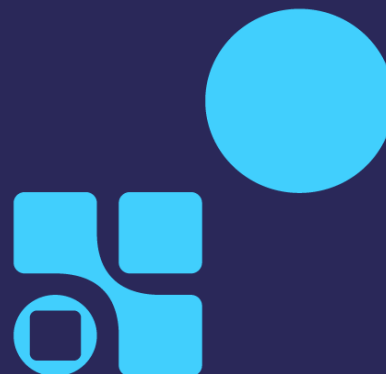




SUSTAINABILITY POLICY

SIRMA GROUP JSC
and its subsidiaries

last updated on 18 June 2026



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SUSTAINABILITY POLICY

Chapter I. General Provisions

Purpose and scope

Art. 1. (1) This Sustainability Policy (the “Policy”) sets out how Sirma Group JSC and its subsidiaries (together “Sirma” or the “Group”) manage the economic, social, environmental and governance aspects of their business, which topics have been identified as material, the commitments Sirma makes and the indicators by which it measures them.

(2) The Policy applies to all companies in the Group and is binding on all employees.

Definition of sustainability

Art. 2. Sirma regards sustainability as the basis of its activity. It adopts the definition of the UN World Commission on Environment and Development (the Brundtland Commission, 1987): development that “meets the needs of the present without compromising the ability of future generations to meet their own needs”, achieved through a balance between economic growth, protection of the environment and social well-being.

Contribution to the United Nations Sustainable Development Goals

Art. 3. (1) The definition finds its operational expression in the United Nations 2030 Agenda for Sustainable Development and the seventeen Sustainable Development Goals (SDGs) established under it, which Sirma recognises as the common international framework through which the contribution of business to sustainable development is understood, compared and held to account.

(2) 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 limited number of them. Sirma has therefore mapped its material topics, the commitments 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 through the solutions Sirma builds for its clients rather than through its own operations, it is stated as indirect.

(3) 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	Indirect contribution. 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.

Goal	Target	Sirma's contribution
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.
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.
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, a Code of Ethics and Whistleblowing Rules, together with channels for reporting irregularities and protection against retaliation, and reports annually on signals received and cases identified.

(4) The mapping is reviewed annually as part of the due diligence under Art. 5 and is reported, together with the quantitative indicators for the year, in the Annual Sustainability Report. The Investor Relations and Sustainability Director maintains the mapping and reports against it, under the supervision of the Investments, Risk and Sustainability Committee. Goals are added or withdrawn as activities, material topics and measurable results change.

Legal framework

Art. 4. (1) Sirma reports on sustainability voluntarily, adhering to the European Sustainability Reporting Standards (ESRS) and to the requirements of Directive (EU) 2022/2464 (CSRD) as they stand at the date of each report, and taking into account the national legislation transposing it.

(2) The Policy also takes into account Regulation (EU) 2020/852 (the Taxonomy), the EU Climate Law (Regulation (EU) 2021/1119) and the National Corporate Governance Code.

Due diligence on sustainability topics

Art. 5. (1) Under the guidance of the Investments, Risk and Sustainability Committee, Sirma carries out a due diligence process on sustainability topics (a double materiality assessment under the ESRS). It analyses the topics, Sirma's impacts and the related risks and opportunities, identifies the material topics and defines indicators (KPIs) for managing them. Measuring, analysing and disclosing the values of these indicators allows Sirma to reduce negative impacts and risks and to make the most of the opportunities.

(2) The process and its results are documented in Sirma's Methodology for Sustainability Due Diligence (the "Methodology") and are updated annually, so that the results follow the changing environment and requirements.

Double materiality assessment

Art. 6. (1) The latest double materiality assessment (2025) examined ten sustainability topics. Each topic was assessed against two criteria – Sirma's impact on people and the environment, and the financial effect on Sirma of risks and opportunities. A topic is material when its overall score reaches the threshold of 15 points on a scale of up to 50. Seven topics are material:

Material topic	Pillar	ESRS	Score
Lifelong learning	Social	S1	45.00
Shareholder care	Governance	Specific to Sirma	42.78
Preferred employer	Social	S1	32.42
Fair employer	Social	S1	27.50
Energy and climate	Environmental	E1	20.28
Corporate governance, values and dialogue	Governance	G1	20.00
Clients and end users	Social	S4	18.56

(2) Clients and end users is the only material topic where impact exceeds the financial effect. The other three topics examined were not material for 2025. The assessment is updated annually under the Methodology (Art. 5), and its results determine the topics on which Sirma sets targets and reports indicators.

Stakeholder dialogue

Art. 7. (1) Sirma maintains a continuous dialogue with its stakeholders at many levels. Feedback is gathered through:

- employee surveys;
- investor days – at least four times a year – for shareholders and investors;
- client surveys;
- general studies covering all stakeholders.

(2) The results of the dialogue are taken into account in the double materiality assessment (Art. 6) and in setting targets and indicators for the material topics.

Risks and opportunities

Art. 8. (1) By implementing the Policy, Sirma manages its material sustainability topics, reduces negative impacts and the effect of risks that could threaten the Group's activity, and pursues the opportunities related to sustainability, while developing sustainably, helping to protect the natural environment and developing the social environment.

(2) Implementation also reduces the costs of realised risks (for example, preventing the loss of qualified employees) and brings a direct economic effect (for example, the production of low-cost electricity from renewable sources).

Elements of sustainability

Art. 9. Sirma identifies the following main components of its sustainable development:

- economic sustainability (Chapter II);
- social sustainability (Chapter III), which includes the resilience of employees (internal) and sustainability along the value chain (external);
- sustainability of the environmental footprint of the activity (Chapter IV);
- sustainable governance (Chapter V).

Chapter II. Economic Sustainability

Basis and activity

Art. 10. (1) Sirma was created to carry out a specific economic activity, meet specific needs of its clients and achieve a positive financial result. Financial and economic sustainability is the basis of all other forms of sustainability: an economically strong company is able to improve its environmental practices, develop its social programme and improve its governance.

(2) Sirma mainly provides IT services and develops software for corporate clients (B2B) from various verticals and thereby helps them achieve and develop their digitalisation.

Commitment

Art. 11. (1) Sirma believes that the digitalisation it provides to its clients (its impact) leads to sustainability and added value for them through:

- increasing the efficiency of each activity by optimising the work processes of clients;
- improving working conditions by eliminating routine and repetitive operations, so that the clients' employees can focus on high-value-added activities;
- reducing the clients' negative environmental footprint by reducing and, where possible, eliminating the need for paper, lowering the energy required for digitalised activities and reducing the need to purchase hardware (through Sirma's cloud services and data centre).

(2) In this way Sirma helps its clients become more sustainable and competitive, which reduces the risks to its own economic sustainability. The greater sustainability of its clients also secures new orders for Sirma's products and services.

Material topic

Art. 12. “Clients and end users” (ESRS S4) is a material topic for Sirma and the only one in which impact materiality exceeds financial materiality.

Measurement and management

Art. 13. (1) Sirma measures its economic sustainability using various indicators, among which:

- sales revenue;
- EBITDA;
- net profit;
- number of new orders and returning clients;
- other economic indicators and ratios.

(2) The results are analysed for the operational management of Sirma’s economic activity and are published in its quarterly and annual reports.

Chapter III. Social Sustainability

Internal social sustainability

Art. 14. (1) Sirma regards the employees of the Group as its main asset, which contributes to the sustainability of its activity.

(2) The risks and opportunities for sustainable social development are analysed annually by the Investments, Risk and Sustainability Committee under the Methodology. The results are presented to the Board of Directors and serve as a basis for the operational management of Sirma.

Commitment

Art. 15. (1) Sirma is committed to working actively to secure the sustainability of its teams and to overcome the related risks by:

- ensuring equality and equal treatment of all potential and current employees;
- selecting highly qualified employees and continuously improving their expertise through additional educational courses;
- promoting a culture of training and development;
- creating and maintaining its own Academy for personnel training and for attracting quality personnel;
- competitive remuneration related to the results achieved, above the IT-industry average in the territories of operation;
- providing a healthy working environment and the possibility of remote work;
- providing additional full health insurance for employees;
- providing additional health activities that support healthy eating and physical activity;
- organising additional events to support the cohesion of the teams in the Group.

(2) The goal is a diverse and sufficient workforce of healthy, well-prepared, motivated employees who find personal satisfaction in the results of the team of which they are part.

Material topics

Art. 16. Internal social sustainability is the leading sustainability topic under the CSRD and contains three of the Group's seven material topics, including the highest-ranked one (2025 assessment):

- fair employer;
- preferred employer;
- lifelong learning.

Measurement and management

Art. 17. (1) The sustainability of Sirma's employees is measured by:

- the average length of employment or management engagement with the companies in the Group, in years;
- the amount invested in training and qualification of employees;
- the total number of person-hours of training and qualification per year;
- other indicators defined in the annual due diligence process (see the Methodology).

(2) The results are analysed for the operational management of the internal social measures and are published in the Annual Sustainability Report.

External social sustainability

Art. 18. (1) Four stakeholder groups are part of Sirma's value chain but are external to the Group (see "Stakeholders" in the Methodology). They are:

- **suppliers** of goods and services that are key to Sirma's business (hardware, cloud service and software providers, banks and others);
- **clients** – the focus of Sirma's Mission and the reason for its existence. Sirma divides its activity into verticals according to the needs of its clients and the specific knowledge required to serve them (banks, insurers, logistics companies, hotel chains and others). Sirma is a B2B company and most of its clients are other business organisations;
- **end users** – the clients of Sirma's clients (for example, the users of a payment system built by Sirma for a bank client). Sirma has no direct contact with them, but they are an important part of its value chain;
- **communities** neighbouring Sirma's operations.

(2) The sustainability of these stakeholders carries over to the sustainability of Sirma; studying and managing it therefore increases the sustainability of the Group.

Commitment

Art. 19. (1) **Towards suppliers:**

- spreading Sirma's sustainable values, as described in this Policy, to its subcontractors;
- encouraging work with suppliers that have sustainable practices.

(2) **Towards clients:**

- acquiring and maintaining a maximum level of knowledge of client verticals and their IT needs;
- being well versed in the latest IT products and services in the world;
- being as innovative as possible in combining the two previous points to provide first-class IT products and services;

- enabling clients, through Sirma's products and services, to become more sustainable, efficient and competitive (see Chapter II).

(3) Towards end users:

- strengthening digital inclusion;
- facilitation and optimisation of everyday life;
- digital security.

(4) Towards communities:

- assistance with digital qualification and requalification of willing members of the community;
- acceptance, inclusion and care for the community representatives employed by Sirma (see Art. 14);
- joint events and financial and material support for local educational institutions, schools and universities in the digital sphere;
- supporting and developing budding entrepreneurs and innovators in the digital sphere;
- positive impact through initiatives of Sirma employees and managers.

Material topics

Art. 20. The only material topic in external social sustainability is “Clients and end users” (Art. 12). Two other topics, although with lower scores for impact, risks and opportunities, remain under monitoring:

- social contribution;
- working conditions in the value chain.

Measurement and management

Art. 21. (1) The sustainability of participants in the value chain is measured through indicators determined in the annual due diligence process (see the Methodology), which include:

- duration in years of partnering with a given supplier;
- repeat sales to existing clients – percentage of turnover;
- number of learning initiatives and number of students at Sirma Academy;
- other indicators determined by the due diligence.

(2) The results are analysed for the operational management of the initiatives with participants in the value chain and are published in the Annual Sustainability Report.

Chapter IV. Environment

Environmental sustainability

Art. 22. (1) A sustainable natural environment is crucial for the long-term sustainability of Sirma. Sirma strives to measure, control and reduce the negative impact of its activity on nature and is convinced that a responsible attitude towards the environment should not collide with economic development or social contribution. These three types of impact must be balanced to achieve true corporate sustainability.

(2) Practices such as producing own energy from renewable sources, energy-efficient hardware, cloud computing and responsible management of e-waste reduce the environmental impact while increasing operational efficiency and competitiveness,

supporting compliance with environmental regulation, saving costs and improving Sirma's reputation among its stakeholders.

(3) The due diligence has identified the following negative impacts of Sirma's activity on the natural environment:

- greenhouse gases from fossil-fuel energy used;
- generation of electronic waste;
- water consumption, limited to household use.

(4) The impacts and the material risks and opportunities related to the natural environment are updated annually under the Methodology.

Commitment

Art. 23. (1) Sirma will fulfil its commitment by:

- maintaining and improving energy-efficient offices and improving energy efficiency;
- minimising the paper used, and using it in Sirma's offices only where this is a regulatory or legal requirement;
- full implementation of the recommended practices for the energy efficiency of the Sirma data centre under the European Code of Conduct on Data Centre Energy Efficiency;
- reducing e-waste and achieving complete recycling of hardware that has gone out of use;
- increasing the use of electricity from (own) renewable sources;
- maintaining the system that allows the remote work of Group employees;
- limiting trips that use fossil fuels and 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, and refraining from funding, supporting or participating in advocacy that opposes climate legislation or the objectives of the Paris Agreement and the EU Climate Law (Art. 24).

(2) In this way Sirma will contribute to reducing the negative impact of its activity on the natural environment and the associated risks.

Climate advocacy and industry participation

Art. 24. (1) 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.

(2) Sirma participates directly in the governing bodies of the organisations of which it is a member. The CEO of Sirma Group 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

gives Sirma direct visibility of, and an active voice in, the positions these organisations adopt on climate and energy matters.

(3) 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

Art. 25. The due diligence determined energy and climate as the material environmental topic, with material impact, risks and opportunities for Sirma (2025 assessment):

- energy and climate change.

E-waste management is not among the material topics of the 2025 assessment but remains covered by the commitments and indicators in this Chapter.

Measurement and management

Art. 26. (1) Sirma measures the sustainability of its environmental impact by:

- the percentage share of recycled unneeded hardware, aiming at full recycling;
- the amount of electricity used per employee;
- the percentage share of electricity used that is produced from renewable sources;
- the amount and percentage share of electricity used that is produced from Sirma's own renewable sources;
- the Scope 1 and Scope 2 greenhouse gas emissions and the carbon intensity per unit of revenue and per employee;
- the number of days of business trips of employees relative to the total number of employees;
- the number of company vehicles and their annual mileage;
- the number of environmental initiatives for employees;
- other indicators defined in the Methodology.

(2) Scope 3 emissions will be included in the Annual Sustainability Report for 2026, after the relevant categories have been defined. Once Scope 3 has been measured, Sirma will set long-term emission reduction targets on the basis of the resulting baseline.

(3) The results are analysed for the operational management of environmental impact, risks and opportunities and are published in the Annual Sustainability Report.

Chapter V. Sustainable Governance

Sustainable governance

Art. 27. (1) Sirma believes that sustainable corporate governance is the glue between all other elements of sustainability.

(2) To protect good practice and impact, to overcome the risks of a lack of sustainable governance and to benefit from its opportunities, Sirma has built a system of instructions, policies, procedures and codes. They are mandatory for all employees of the Group and are published at www.sirma.com.

Commitment

Art. 28. Sirma will fulfil its commitment by:

- 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 Sirma from any form of discrimination that would violate social sustainability;
- protection and control against abuse of inside information;
- ensuring compliance and preventing sanctions from state and regulatory authorities;
- cybersecurity and data protection of Sirma and its clients;
- complying with the principles of corporate governance in Art. 29.

Principles of corporate governance

Art. 29. (1) Corporate governance principles are essential for the successful functioning of Sirma. They provide a framework for decision-making that is transparent, accountable and ethical, strengthen stakeholder trust and build a stable corporate culture, which is key to sustainable development.



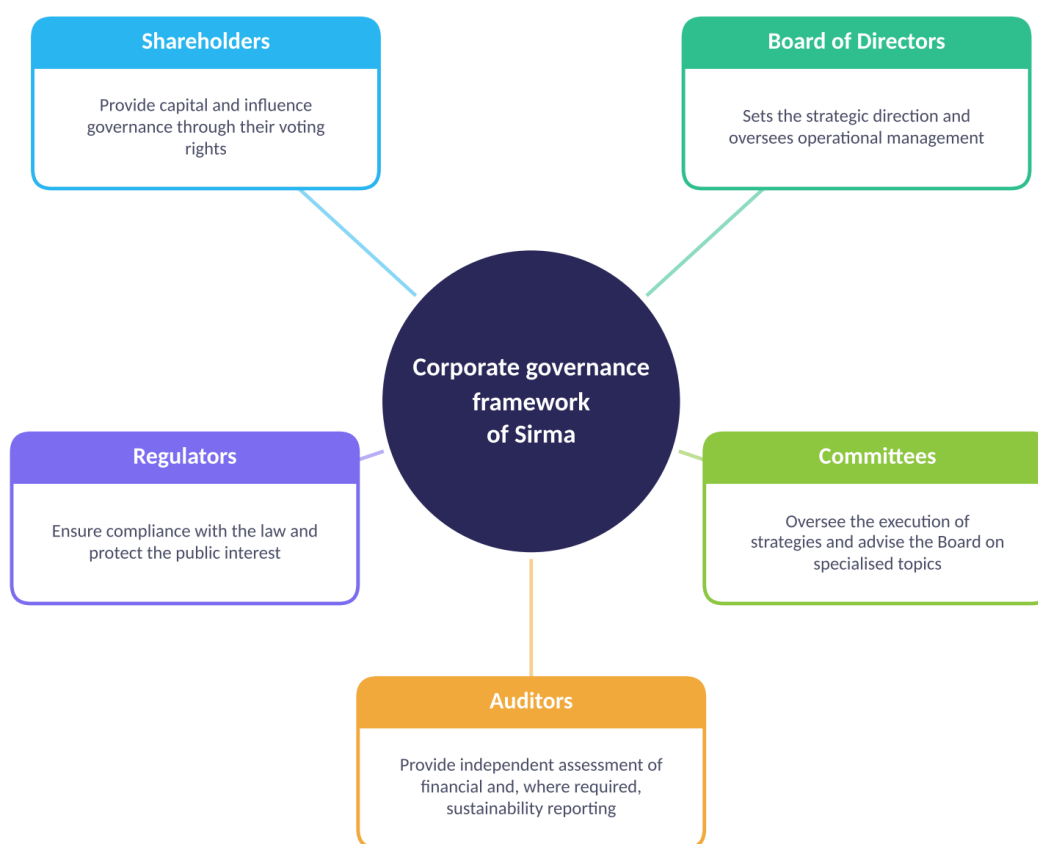
(2) Sirma's principles are:

1. **Transparency** – information about Sirma, including financial statements, strategy, risks and other important aspects of the business, is easily accessible, timely and understandable for all stakeholders. Transparency builds trust between shareholders, employees and the public.
2. **Accountability** – management and the Board of Directors act in the best interests of the company and its shareholders and take decisions that serve its long-term value, not only short-term profit. They are accountable for their actions and decisions.

3. **Fairness** – all shareholders and stakeholders are treated equally, including through the protection of the rights of minority shareholders and equal access to information. This prevents conflicts of interest and promotes good practice.
4. **Ethics and integrity** – ethical standards guide the behaviour of managers and employees, and the corporate culture promotes honesty, integrity and responsibility. This maintains the trust of clients and partners.
5. **Sustainable development** – a balance between the economic, social and environmental aspects of the business. Sirma strives to minimise its negative impact on the environment and to contribute to the social well-being of its stakeholders.

Driving forces

Art. 30. Sirma's corporate governance system, built on these principles, organises, directs and controls all processes in the company. Its main driving forces and their functions are shown in the diagram:



Responsibility and control

Art. 31. (1) The corporate governance framework of Sirma is under the direct control of the Board of Directors and the operational management of the Chief Executive Officer. The Remuneration Policy for the members of the Board of Directors, adopted by the General Meeting of Shareholders, links their remuneration and bonuses to the results achieved.

(2) The management system consists of internal documents that regulate internal functions. Each group of documents has a designated coordinator and a responsible member of senior management:

- documents on the management of human potential – coordinator: HR Director; responsible: Chief Talent Management Director;
- documents on sustainable development – coordinator: Investor Relations and Sustainability Director; responsible: Chief Financial Officer;
- documents on digital security – coordinator: Cybersecurity Officer; responsible: Chief Operating Officer;
- documents on certification under ISO standards – coordinator: Compliance Coordinator; responsible: Chief Operating Officer.

(3) 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 Investments, Risk and Sustainability Committee, which reports the outcome to the Board of Directors.

(4) Control over the implementation of the internal documents of the companies and the results achieved is exercised by:

- the Boards of Directors of the companies in the Group;
- the Audit Committee;
- the external registered auditor;
- the General Meeting of Shareholders;
- the external regulators.

Material topics

Art. 32. The due diligence identified two material governance topics for Sirma (2025 assessment):

- shareholder care;
- corporate governance, values and dialogue.

Measurement and management

Art. 33. (1) Sirma's sustainable governance is measured by various indicators, some of which are:

- gender balance – the share of women and men among employees and at management level, and the difference between the average remuneration of men and women;
- the number of signals of corruption, bribery or other abuse received and of cases identified under the Group's internal documents;
- the number of registered breaches of Sirma's digital security system;
- the number of sanctions imposed by regulators and the 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 Methodology.

(2) The results are analysed in order to achieve sustainable operational governance and are published in the Annual Sustainability Report.

Chapter VI. Disclosure

Art. 34. (1) Sirma discloses all information related to sustainability in its Annual Sustainability Report, prepared on a consolidated basis, adhering to the ESRS (Art. 4) and in accordance with applicable regulatory requirements.

(2) Annual targets are set for the material topics (Art. 6) and are published in the annual sustainability reports together with the results achieved.

Chapter VII. Transitional and Final Provisions

§ 1. The Policy was developed by the Board of Directors of Sirma Group JSC and has applied since 1 January 2022.

§ 2. The Company's name in the Policy was updated to Sirma Group JSC pursuant to a resolution of the General Meeting of Shareholders of 18.06.2026.

§ 3. The Policy is reviewed and updated at least once a year by the Investments, Risk and Sustainability Committee. The decisions of the Committee are approved by the Board of Directors.

Amendment history

Date	Decision	Amendment
20.03.2024	Decision of the Board of Directors	Adoption of the Policy; applied from 01.01.2022
18.06.2026	Resolution of the General Meeting of Shareholders	Change of the Company's name to Sirma Group JSC (§ 2)

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