CHARTER DISCLOSURE COMMITTEE

OF

SIRMA GROUP JSC

AND ITS SUBSIDIARIES

last updated on 18 June 2026

CONTENTS

I. General Provisions 2
II. Composition 2
III. Functioning 2
IV. Responsibilities 3

CHARTER OF THE INFORMATION DISCLOSURE COMMITTEE OF SIRMA GROUP JSC AND ITS SUBSIDIARIES

I. General Provisions

Art. 1. Purpose and status

(1) The Information Disclosure Committee (the "Committee") is responsible for the organisation and control of information disclosure by Sirma Group JSC and its Subsidiaries ("Sirma", the "Group").

(2) The Committee acts as a committee of the Board of Directors (the "Board") under Art. 14(4) of the Board Rules.

Art. 2. Relationship to other documents

(1) Sirma's Information Disclosure Policy is Chapter VII ("Disclosure Policy") of the Corporate Governance Program of Sirma Group JSC and its Subsidiaries (the "Program"); it is adopted by the Board and published at www.sirma.com. The calendar of corporate events is in Chapter VIII of the Program. The operative system under item 2 of Art. 8 is the Information Disclosure Procedure (the "Procedure"). The Committee also acts in line with the Insider Instructions.

(2) In case of conflict between this Charter and the Procedure on the composition and functions of the Committee, the Charter prevails.

II. Composition

Art. 3. Composition and members

(1) The Board elects at least three members of the Committee. At least one member is external to the Board and has the necessary economic education. All members are professionals with proven business acumen.

(2) The chair of the Committee is Tsvetan Alexiev. The other members are Georgi Marinov, Atanas Kiryakov, Chavdar Dimitrov and Stanislav Tanushev.

(3) The members of the Committee have access to inside information and are entered on the list under the Insider Instructions. One member is appointed secretary and prepares and keeps the minutes of the meetings at which decisions are taken.

III. Functioning

Art. 4. Meetings

(1) The Committee meets at a frequency it sets itself, so that it fulfils its responsibilities under items 1–3 of Art. 8 in due time, within the legal and internal deadlines. As a minimum, the Committee meets every quarter, before the reports are published.

(2) To fulfil its obligation under item 4 of Art. 8, the Committee meets at least once every six months to analyse the effects of applying the Policy and the Procedure and to issue a status statement.

Art. 5. Opinions before disclosure

Before regulated information, inside information and other undisclosed information on the Group's financial position, results or strategy is disclosed, the Committee gives an

opinion under the Procedure. The opinion may be given by the chair or by at least one member, including by e-mail, and is recorded in the Register of Disclosures.

Art. 6. Decisions and Board approval

The Committee's proposals on the Policy and its decisions on the Procedure and the internal rules under Art. 8 are approved by the Board. Opinions on individual disclosures take effect without Board approval; the Board receives a monthly overview of the information disclosed.

Art. 7. External consultants

In pursuing its goals the Committee may use the professional help of external consultants.

IV. Responsibilities

Art. 8. Responsibilities of the Committee

The Committee:

1. proposes to the Board amendments to the Information Disclosure Policy (Chapter VII of the Program) in full compliance with the National Corporate Governance Code (2024);
2. in line with the Policy, elaborates the operative information disclosure system – the Procedure – which guarantees completeness, timeliness, correctness and clarity of the information and equal treatment of all beneficiaries;
3. develops and controls the execution of internal rules for the preparation and disclosure of annual and interim reports;
4. supervises the implementation of the Policy and the Procedure and proposes amendments to them, at least once a year and whenever the law or the rules of the markets on which Sirma's securities are traded change;
5. gives opinions before disclosure under Art. 5;
6. decides whether information is inside information and whether its disclosure is delayed under Art. 17(4) MAR, in line with the Insider Instructions, and informs the Investor Relations Director (the "IR Director") and the Chief Financial Officer (CFO);
7. monitors the disclosure deadlines and the requirements of the Prime Standard segment of the Frankfurt Stock Exchange and reports to the Board at least once every six months.

Final provisions

§ 1. By decision of the General Meeting of Shareholders of 18.06.2026, the Company's name was changed to Sirma Group JSC. All references to Sirma Group Holding JSC, Sirma Group Holding, SGH or the Holding in this Charter are to be read as references to Sirma Group JSC.

§ 2. The Charter applies together with the Procedure and replaces the Committee's previous Charter.

Amendment history

Date	Decision	Amendment
24.03.2024	Resolution of the Board of Directors	Adoption of the Charter
18 Jun 2026	Resolution of the General Meeting of Shareholders	Change of the Company name to Sirma Group JSC

* * *