

Annex № 9
**To Art. 28, Par. 2 of Ordinance № 2 from 17.09.2003
 FACTS AND CIRCUMSTANCES TO BE DISCLOSED AND HAVE
 OCCURRED IN THE FIRST HALF OF 2016 FOR ISSUERS**
SOPHARMA AD
1.1. Change in the persons controlling the Company.

No changes.

1.6. Opening of bankruptcy proceedings and all significant events associated to such proceedings.

No bankruptcy proceedings.

1.7. Contracted or executed significant transactions.

No significant transactions outside of the ordinary activities of the companies.

1.8. Decision on conclusion, termination and cancellation of joint venture agreements.

None,

1.10. Change of the auditors of the company and reason for this change.

No change in the auditors of the company.

1.30. Initiation or termination of a court or arbitration proceedings relating to claims or liabilities of the company or its subsidiary, with the price of the claim at least 10% of the company's equity.

No such litigation proceedings.

1.31. Purchase, sale or pledge of shares in companies of the issuer or its subsidiary in the first quarter of 2016.

Structure of the Group and principal activities

The *structure* of the Group includes Sopharma AD as a parent company and the subsidiaries stated below:

Subsidiaries	30.09.2016 Interest %	31.12.2015 Interest %	Date of acquisition of control	Date of disposition of control
Companies in Bulgaria				
Sopharma Trading AD*	72.40	72.13	08.06.2006	
Pharmalogistica AD	80.80	78.37	15.08.2002	
Electroncommerce EOOD	100	100	09.08.2005	
Biopharm Engineering AD	97.15	97.15	10.03.2006	
Sopharma Buildings REIT	40.39	40.75	04.08.2008	
Momina Krepost AD	93.53	92.78	01.01.2008	
Unipharm AD *	52.53	52.06	27.10.2010	
Phyto Palauzovo AD	95	95	21.09.2012	
Sopharmacy EOOD**	72.40	72.13	19.01.2015	
Sopharmacy 2 EOOD**	72.40	72.13	05.06.2015	
Sopharmacy 3 EOOD**	72.40	72.13	02.12.2015	
Sopharmacy 4 EOOD**	72.40	-	29.02.2016	
Sopharmacy 5 EOOD**	72.40	-	01.03.2016	
Sopharmacy 6 EOOD**	72.40	72.13	03.12.2015	
Medica AD	97.96	66.72	26.10.2015	

Medica-Zdrave EOOD (in process of liquidation)** 97.96 66.72 26.10.2015

* effective percentage of interest

** indirect interest

Subsidiaries	30.09.2016 Interest %	31.12.2015 Interest %	Date of acquisition of control	Date of disposal of control
Companies abroad				
SIA Briz	66.13	66.13	10.11.2009	
SOOO Brititrade **	52.90	51.91	10.11.2009	
PAO Vitamini	99.56	99.56	18.01.2008	
	-	51		
Ivančić and Sinovi d.o.o.			10.04.2008	09.05.2016
Sopharma Warsaw SP. Z.O.O.	100	100	23.11.2010	
Sopharma Trading d.o.o. Belgrade**	72.40	72.13	05.06.2015	
Sopharma Poland Z.O.O. – in liquidation	60	60	16.10.2003	
Medica Balkans S.R.L. **	-	66.72	26.10.2015	24.03.2016
OOO Tabina **	62.82	58.86	08.04.2011	
SOOO Brizpharm **	46.26	39.41	20.12.2012	
ODO Alean **	65.87	64.81	07.02.2013	
OOO Sopharma Ukraine	100	100	07.08.2012	
OOO Farmacevt Plus **	42.98	42.98	31.05.2013	
UAB TBS Pharma**	33.73	33.73	01.03.2013	
ODO Vestpharm **	62.82	62.82	04.07.2013	
OOO NPK Biotest **	-	46.29	02.09.2013	26.08.2016
ODO BelAgroMed **	50.26	50.26	30.07.2013	
TOO Sopharma Kazakhstan	100	100	06.11.2014	
OOO Danapharm**	48.94	48.14	28.02.2015	
OOO Galenapharm**	48.94	48.14	28.02.2015	
ODO Medjel**	48.94	48.14	28.02.2015	
ODO Alenpharm-plus**	48.94	48.14	30.06.2015	
OOO Farmatea**	22.39	33.73	30.11.2015	
OOO Mobil Line **	48.94	-	16.02.2016	

* effective percentage of interest

** indirect interest

- Unipharm AD is a subsidiary of Sopharma AD, the control thereon being acquired and exercised through the direct participation of the parent company in the ownership of Unipharm AD with 49.99% and the indirect participation of the parent company with 2.54% through the subsidiary Sopharma Trading AD holding 3.22% and Medica AD holding 0.23% of the capital of Unipharm AD;
- Sopharma Trading AD is a subsidiary of Sopharma AD, the control thereon being acquired and exercised through the direct participation of the parent company in the ownership of Sopharma Trading AD with 71.98% and the indirect participation of the parent company with

0.42% through the subsidiary Medica AD holding 0.40% of the capital of Sopharma Trading AD and Unipharm AD with 0.02% of the capital of Sopharma Trading AD;

- Sopharma Buildings REIT is a subsidiary by virtue of a written agreement for control concluded between Sopharma AD and other shareholders;
- Phyto Palauzovo AD is a direct subsidiary after the merger of Bulgarian Rose Sevtopolis AD into Sopharma AD (since 1 January 2015);
- Sopharmacy EOOD is a subsidiary of Sopharma Trading AD whereas the latter holds 100% of the capital of Sopharmacy EOOD;
- Sopharmacy 2 EOOD is a subsidiary of Sopharmacy EOOD whereas the latter holds 100% of the capital of Sopharmacy 2 EOOD;
- Sopharmacy 3 EOOD is a subsidiary of Sopharmacy EOOD whereas the latter holds 100% of the capital of Sopharmacy 3 EOOD;
- Sopharmacy 4 EOOD is a subsidiary of Sopharmacy EOOD whereas the latter holds 100% of the capital of Sopharmacy 3 EOOD;
- Sopharmacy 5 EOOD is a subsidiary of Sopharmacy EOOD whereas the latter holds 100% of the capital of Sopharmacy 3 EOOD;
- Sopharmacy 6 EOOD is a subsidiary of Sopharmacy EOOD whereas the latter holds 100% of the capital of Pharma Online EOOD;
- Sopharma Trading d.o.o. Belgrade is a subsidiary of Sopharma Trading AD whereas the latter holds 100% of the capital of Sopharma Trading d.o.o. Belgrade;
- Medica-Zdrave EOOD (in process of liquidation) is a subsidiary of Medica AD whereas the latter holds 100% of the capital of Medica-Zdrave EOOD;
- SOOO Brititrade, Belarus, is a subsidiary of Briz SIA, Latvia – Briz SIA holds 80% of the capital of SOOO Brititrade;
- OOO Tabina, Belarus, is a subsidiary through Briz SIA, Latvia – Briz SIA holds 95% of the capital of OOO Tabina;
- SOOO Brizpharm, Belarus, is a subsidiary through Briz SIA, Latvia – Briz SIA holds 69.25% of the capital of SOOO Brizpharm;
- ODO Alean, Belarus, is a subsidiary through Briz SIA, Latvia and its subsidiary SOOO Brititrade, Belarus – Briz SIA holds 98% of the capital of ODO Alean and SOOO Brititrade, Belarus – 2% of the capital of ODO Alean;
- OOO Farmacevt Plus, Belarus, is a subsidiary through Briz SIA, Latvia – Briz SIA holds 65% of the capital of OOO Farmacevt Plus;
- UAB TBS Pharma, Lithuania, is a subsidiary through Briz SIA, Latvia – Briz SIA holds 51% of the capital of UAB TBS Pharma;
- ODO Vestpharm, Belarus, is a subsidiary through Briz SIA, Latvia – Briz SIA holds 95% of the capital of ODO Vestpharm;
- OOO NPK Biotest, Belarus, is a subsidiary through Briz SIA, Latvia – Briz SIA holds 70% of the capital of OOO NPK Biotest;

- ODO BelAgroMed, Belarus, is a subsidiary through Briz SIA, Latvia – Briz SIA holds 76% of the capital of ODO BelAgroMed;
- OOO Danapharm, Belarus, is a subsidiary through Briz SIA, Latvia, and its subsidiary SOOO Brititrade, Belarus – Briz SIA holds 10% and SOOO Brititrade holds 80% of the capital of OOO Danapharm;
- OOO Galenapharm, Belarus, is a subsidiary through Briz SIA, Latvia, and its subsidiary SOOO Brititrade, Belarus – Briz SIA holds 10% and SOOO Brititrade holds 80% of the capital of OOO Galenapharm;
- ODO Medjel, Belarus, is a subsidiary through Briz SIA, Latvia, and its subsidiary SOOO Brititrade, Belarus – Briz SIA holds 10% and SOOO Brititrade holds 80% of the capital of ODO Medjel;
- ODO Alenpharm-plus, Belarus, is a subsidiary through Briz SIA, Latvia, and its subsidiary SOOO Brititrade, Belarus – Briz SIA holds 10% and SOOO Brititrade holds 80% of the capital of ODO Alenpharm-plus;
- OOO Farmatea, Belarus, is a subsidiary through Briz SIA, Latvia and its subsidiary OOO Pharmaceft Plus, Belarus – Briz SIA holds 2%, and OOO Pharmaceft Plus – 49% of the capital of OOO Farmatea.
- OOO Mobil Line, Belarus is a subsidiary through SIA Briz, Latvia and its subsidiary SOOO Brititrade, Belarus – SIA Briz owns 10%, and SOOO Brititrade – 80% of the capital of OOO Mobil Line.

AVAILABLE-FOR-SALE INVESTMENTS

The carrying amount of the investments by company is as follows:

	Country	30.09.2016 BGN '000	Interest %	31.12.2015 BGN '000	Interest %
Doverie United Holding AD	Bulgaria	2,804	19.87	2,805	19.88
Lavena AD	Bulgaria	1,599	11.21	1,567	11.03
Olainfarm AD	Latvia	1,535	0.77	1,553	0.77
Extab Pharma Inc. – USA	USA	290	5.00	290	5.00
OOO Pharmico	Belarus	172	2.00	172	2.00
Sopharma Properties REIT	Bulgaria	159	0.18	39	0.05
Hydroizomat AD	Bulgaria	133	10.65	132	10.65
ODO DKM-Pharm	Belarus	100	2.00	100	2.00
OOO Set Aptek	Belarus	70	2.00	70	2.00
Monbat AD	Bulgaria	50	0.02	-	-
Todorov AD	Bulgaria	22	4.69	22	4.74
Elana Money Market Fund	Bulgaria	-	-	257	1.14
MF Elana Eurofund	Bulgaria	-	-	252	6.34

Elana Agrocredit AD	Bulgaria	-	-	67	1.26
Other		96		98	
Total		<u>7,031</u>		<u>7,424</u>	

The Group's intentions towards its shareholding in Doverie United Holding AD are purely investment related and, therefore, the investment is treated as "available-for-sale".

The other available-for-sale financial assets as at 30 September 2016, amounting to BGN 100 thousand (31 December 2015: BGN 98 thousand), include a number of minority interests of the Group in the capital of five companies (31 December 2015: six companies).

The investments in Extab Pharma Inc., USA and all other companies in Belarus are valued and presented in the consolidated financial statements at acquisition cost.

1.34. Other circumstances which the company believes could be relevant for investors in deciding to acquire, sell or continue to hold publicly traded securities:

All circumstances which the company believes could be relevant for investors in deciding to acquire, sell or continue to hold publicly traded securities have been publicly disclosed including in the consolidated financial report for the first nine months of 2016.