

Annex № 9

To Art. 33, Par. 1, item 3 of Ordinance № 2 from 17.09.2003

Facts and circumstances subject to disclosure

Sopharma Group as at 31 March 2020

1.1. No change in the persons exercising control the Company.

1.6. No opening of bankruptcy proceedings against the Company or its subsidiary or any significant events related to production.

1.7. Conclusion or execution of significant transactions

There are no significant transactions beyond the ordinary course of business.

1.8. There are no agreements for conclusion, termination and cancellation of joint venture.

1.10. Change in the Company's auditors and reasons for that.

The General Meeting of Shareholders of “Sopharma” AD selected the auditing company Baker Tilly Klitou and Partners OOD as a registered auditor of the Company for 2019. The reason for the change of the current external auditor "AFA" OOD is compliance with the requirements of Article 65, paragraph 3 of the Independent Financial Audit Act.

1.30. No 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.

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

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

Group structure and changes in ownership interests:

Subsidiaries	31.03.2020	31.12.2019	Date of	Date of
Companies in Bulgaria	Interest	Interest	acquisition	disposal
	%	%	of control	of control
“Sopharma Trading” AD*	74.23	74.23	08.06.2006	
“Pharmalogistica” AD	89.39	89.39	15.08.2002	
“Electroncommerce” EOOD	100.00	100.00	09.08.2005	
“Biopharm Engineering” AD	97.15	97.15	10.03.2006	
“Sopharma Buildings” REIT	40.38	40.38	04.08.2008	
“Momina Krepost” AD	63.12	63.12	01.01.2008	
“Phyto Palauzovo” AD	95.00	95.00	21.09.2012	
“Veta Pharma” AD	99.98	99.98	11.11.2016	
“Aromania” AD	76.00	76.00	31.07.2017	
“Sopharmacy” EOOD**	74.23	74.23	19.01.2015	
“Sopharmacy 2” EOOD**	74.23	74.23	05.06.2015	
“Sopharmacy 3” EOOD**	74.23	74.23	02.12.2015	

“Sopharmacy 4” EOOD**	74.23	74.23	29.02.2016
“Sopharmacy 5” EOOD**	74.23	74.23	01.03.2016
“Sopharmacy 6” EOOD**	74.23	74.23	03.12.2015
“Sopharmacy 7” EOOD**	74.23	74.23	15.03.2017
“Sopharmacy 8” EOOD**	74.23	74.23	27.06.2017
“Sopharmacy 9” EOOD**	74.23	74.23	11.09.2017
“Sopharmacy 10” EOOD**	74.23	74.23	11.09.2017
“Sopharmacy 11” EOOD	74.23	74.23	07.12.2017
“Sopharmacy 12” EOOD	74.23	74.23	07.12.2017
“Sopharmacy 13” EOOD	74.23	74.23	07.12.2017
“Sopharmacy 14” EOOD	74.23	74.23	07.12.2017
“Sopharmacy 15” EOOD	74.23	74.23	07.12.2017
“Sopharmacy 16” EOOD **	74.23	74.23	15.05.2018
“Sopharmacy 17” EOOD **	74.23	74.23	15.05.2018
“Sopharmacy 18” EOOD **	74.23	74.23	28.02.2019

* effective percentage of interest
** indirect interest

Subsidiaries	31.03.2020	31.12.2019	Date of	Date of
	Interest	Interest	acquisition	disposal
Companies abroad	%	%	of control	of control
SIA “Briz”	68.14	68.14	10.11.2009	
SOOO “Brititrade” **	54.51	54.51	10.11.2009	
PAO “Vitamini”	100.00	100.00	18.01.2008	
“Sopharma Warsaw” SP. Z.O.O.	100.00	100.00	23.11.2010	
“Sopharma Trading Pharmaceuticals”** (“Sopharma Trading” d.o.o. Belgrade**)	74.23	74.23	05.06.2015	
“Sopharma Poland” Z.O.O. – in liquidation	60.00	60.00	16.10.2003	
OOO “Tabina” **	54.66	54.66	08.04.2011	
SOOO “Brizpharm” **	-	56.42	20.12.2012	31.01.2020
OOO “Sopharma Ukraine”	100.00	100.00	07.08.2012	
OOO “Farmacevt Plus” **	40.26	41.28	31.05.2013	
TOO “Sopharma Kazakhstan”	100.00	100.00	06.11.2014	
OOO “Galenapharm”**	61.73	61.73	28.02.2015	
ODO “Medjel”**	55.87	55.87	28.02.2015	
ODO “Alenpharm-plus”**	62.68	62.68	30.06.2015	
ODO SalusLine**	52.47	52.47	18.11.2016	
“Rap Pharma International” OOD	80.00	80.00	14.04.2017	
ZAO “Interpharm” **	61.33	61.33	26.04.2017	
“Sopharma Trading” d.o.o. (Lekovit d.o.o.**)	74.23	74.23	09.08.2017	
OOO “Zdorovei”**	45.55	46.38	16.08.2017	
BOOO “SpetsAfarmacia” **	47.70	47.70	16.08.2018	
OOO “Bellerofon”**	58.46	61.33	07.03.2019	
UAB “Recessus”, Lithuania **	34.74	34.74	26.09.2019	
OOO “Zdorovey Pharn” **	29.61	-	02.03.2020	

* effective percentage of interest
** indirect interest

- “Sopharma Buildings” REIT is a subsidiary by virtue of a written agreement for control concluded between “Sopharma” AD and other shareholders;

- “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 4” EOOD;
- “Sopharmacy 5” EOOD is a subsidiary of “Sopharmacy” EOOD whereas the latter holds 100% of the capital of “Sopharmacy 5” EOOD;
- “Sopharmacy 6” EOOD is a subsidiary of “Sopharmacy” EOOD whereas the latter holds 100% of the capital of Soparmacy 6 EOOD;
- “Sopharmacy 7” EOOD is a subsidiary of “Sopharmacy” EOOD whereas the latter holds 100% of the capital of Pharma Online EOOD;
- “Sopharmacy 8” EOOD is a subsidiary of “Sopharmacy” EOOD whereas the latter holds 100% of the capital of Pharma Online EOOD;
- “Sopharmacy 9” EOOD is a subsidiary of “Sopharmacy” EOOD whereas the latter holds 100% of the capital of Pharma Online EOOD;
- “Sopharmacy 10” EOOD is a subsidiary of “Sopharmacy” EOOD whereas the latter holds 100% of the capital of “Pharma Online” EOOD;
- “Sopharmacy 11” EOOD is a subsidiary through “Sopharma Trading” AD“Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharmacy 11” EOOD;
- “Sopharmacy 12” EOOD is a subsidiary through “Sopharma Trading” AD“Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharmacy 12” EOOD;
- “Sopharmacy 13” EOOD “Sopharmacy 13” EOOD is a subsidiary through “Sopharma Trading” AD“Sopharma Trading” AD whereas the latter holds 100% of the capital of Sopharmacy 13 EOOD;
- “Sopharmacy 14” EOOD is a subsidiary through “Sopharma Trading” AD“Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharmacy 14” EOOD ;
- “Sopharmacy 15” EOOD is a subsidiary through “Sopharma Trading” AD“Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharmacy 15” EOOD ;
- “Sopharmacy 16” EOOD is a subsidiary through “Sopharma Trading” AD“Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharmacy 16” EOOD ;
- “Sopharmacy 17” EOOD is a subsidiary through “Sopharma Trading” AD“Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharmacy 17” EOOD ;
- “Sopharmacy 18” EOOD is a subsidiary through “Sopharma Trading” AD“Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharmacy 18” EOOD ;

- “Sopharma Trading Pharmaceuticals” is a subsidiary of “Sopharma Trading” AD “Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharma Trading Pharmaceuticals”;
- “Sopharma Trading” d.o.o. is a subsidiary of “Sopharma Trading” AD “Sopharma Trading” AD whereas the latter holds 100% of the capital of Sopharma Trading d.o.o.;
- SOOO “Brititrade”, Belarus, is a subsidiary of SIA “Briz”, Latvia, whereas the latter holds 80% of the capital of SOOO “Brititrade”;
- OOO “Tabina”, Belarus, is a subsidiary through SIA “Briz”, Latvia, and its subsidiary SOOO “Brititrade”, Belarus, whereas SIA “Briz” holds 1.10% of the capital, and SOOO “Brititrade” – 98.9% of the capital of OOO “Tabina”;
- SOOO “Brizpharm”, Belarus, is a subsidiary through SIA “Briz”, Latvia, and its subsidiary SOOO “Brititrade”, Belarus, whereas SIA “Briz” holds 14.02% of the capital, and SOOO “Brititrade” – 85.98% of the capital of SOOO “Brizpharm”;
- OOO “Farmacevt Plus”, Belarus, is a subsidiary through SIA “Briz”, Latvia, whereas the latter holds 59.08% of the capital of OOO “Farmacevt Plus”;
- OOO “Galenapharm”, Belarus, is a subsidiary through SIA “Briz”, Latvia, and its subsidiary SOOO “Brititrade”, Belarus, whereas SIA “Briz” holds 47% and SOOO “Brititrade” holds 37% of the capital of OOO “Galenapharm”;
- ODO “Medjel”, Belarus, is a subsidiary through SIA “Briz”, Latvia, and its subsidiary SOOO “Brititrade”, Belarus, whereas SIA “Briz” holds 50% and SOOO “Brititrade” holds 30% of the capital of ODO “Medjel”;
- ODO “Alenpharm-plus”, Belarus, is a subsidiary through SIA “Briz”, Latvia, and its subsidiary SOOO “Brititrade”, Belarus, whereas SIA “Briz” holds 59.90% and SOOO “Brititrade” holds 40.10% of the capital of ODO “Alenpharm-plus”;
- ODO “SalusLine” Belarus, is a subsidiary through SIA “Briz”, Latvia, and its subsidiary SOOO “Brititrade”, Belarus, whereas SIA “Briz” holds 25%, and SOOO “Brititrade” holds 65% of the capital of ODO “SalusLine”;
- ZAO “Interpharm”, Belarus, is a subsidiary through SIA “Briz”, Latvia, and its subsidiary SOOO “Brititrade”, Belarus, whereas SIA “Briz” holds 50%, and SOOO “Brititrade” – 50% of the capital of ZAO “Interpharm”;
- OOO “Zdorovei”, Belarus, is a subsidiary through SIA “Briz”, Latvia, and its subsidiary OOO “Pharmacevt Plus”, Belarus, whereas SIA “Briz” holds 19%, and OOO “Pharmacevt Plus” holds 81% of the capital of OOO “Zdorovei”;
- BOOO “SpetsAfarmatsia”, Belarus, is a subsidiary through SIA “Briz”, Latvia, and its subsidiary SOOO “Brititrade”, Belarus – SIA “Briz” holds 50%, and SOOO “Brititrade” – 25% of the capital of BOOO “SpetsAfarmatsia”.
- OOO “Bellerofon”, Belarus, is a subsidiary through SIA “Briz”, Latvia, and its subsidiary SOOO “Brititrade”, Belarus – SIA “Briz” holds 50%, and SOOO “Brititrade” – 71% of the capital of OOO “Bellerofon”.

- UAB “Recessus”, Lithuania, is a subsidiary through SIA “Briz”, Latvia - SIA “Briz” holds 50.98% of the capital of UAB “Recessus”, Lithuania.
- OOO “Zdorovey Pharm”, Belarus is a subsidiary through OOO “Zdorovey”, Belarus - OOO “Zdorovey” owns 65% of the capital of OOO “Zdorovey Pharm”.

OTHER LONG-TERM EQUITY INVESTMENTS

Other long-term equity investments include participations (shares) in the following companies:

	<i>Country</i>	<i>31.12.2020</i> <i>BGN '000</i>	<i>Interest</i> <i>%</i>	<i>31.12.2019</i> <i>BGN '000</i>	<i>Interest</i> <i>%</i>
Traded securities					
“Lavena” AD	<i>Bulgaria</i>	4,668	12.91	4,771	12.68
“Sopharma Properties” REIT	<i>Bulgaria</i>	3,772	2.85	2,925	2.13
“Olainfarm” AD	<i>Latvia</i>	1,286	0.77	1,587	0.77
“Chimimport” AD	<i>Bulgaria</i>	318	0.13	13	0.00
“Achieve Life Sciences” Inc.	<i>USA</i>	23	0.12	44	0.12
“Todorov” AD	<i>Bulgaria</i>	-	0.01	208	12.45
BTF “Expat Bulgaria”	<i>Bulgaria</i>	4	0.01	5	0.01
Other		4	-	7	-
		10,075		9,560	
<i>Non-traded securities</i>					
OOO “Fitobel”	<i>Belarus</i>	1,517	19.90	-	-
ODO “Ne Ska”	<i>Belarus</i>	868	19.90	-	-
OOO “Farmico”	<i>Belarus</i>	172	2.00	172	2.00
ODO “DKM-Pharm”	<i>Belarus</i>	100	2.00	100	2.00
OOO “Set Aptek”	<i>Belarus</i>	70	2.00	70	2.00
Balkanpharma-Razgrad AD	<i>Bulgaria</i>	70	-	70	-
Imvenchar	<i>Belarus</i>	50	1.36	50	1.36
OOO Aptekar-Center		24	0.14	24	0.14
Others		32	-	33	-
		2,903		519	
Total		12,978		10,079	

As at 31 March 2020, as “others” are stated long-term equity investments at the amount of 36 thousand (31 December 2019: BGN 40 thousand) - very small minority interests of the Group in the capital of seven companies (31 December 2019: seven companies).

1.34. For issuers - 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, that the Company considers important for the investors while making the decision to acquire, sell or continue to possess shares are revealed in public, are included in the interim consolidated annual financial statements for the first quarter of 2020.



Ognian Donev, PhD
Executive director