

## 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 30 September 2019*

***1.1. No change in the persons controlling 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***

***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 2017. The reason for change of the previous external auditor AFA OOD is compliance with the requirements of art.65, par.3 of the Independent Financial Act Audit.

***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:

<b><i>Subsidiaries</i></b>	<b><i>30.09.2019</i></b>	<b><i>31.12.2018</i></b>	<b><i>Date of</i></b>	<b><i>Date of</i></b>
<b><i>Companies in Bulgaria</i></b>	<b><i>Interest</i></b>	<b><i>Interest</i></b>	<b><i>acquisition</i></b>	<b><i>disposal</i></b>
	<b><i>%</i></b>	<b><i>%</i></b>	<b><i>of control</i></b>	<b><i>of control</i></b>
Sopharma Trading AD*	73.03	72.96	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	65.07	93.56	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**	73.03	72.96	19.01.2015	
Sopharmacy 2 EOOD**	73.03	72.96	05.06.2015	
Sopharmacy 3 EOOD**	73.03	72.96	02.12.2015	
Sopharmacy 4 EOOD**	73.03	72.96	29.02.2016	
Sopharmacy 5 EOOD**	73.03	72.96	01.03.2016	

Sopharmacy 6 EOOD**	73.03	72.96	03.12.2015
Sopharmacy 7 EOOD**	73.03	72.96	15.03.2017
Sopharmacy 8 EOOD**	73.03	72.96	27.06.2017
Sopharmacy 9 EOOD**	73.03	72.96	11.09.2017
Sopharmacy 10 EOOD**	73.03	72.96	11.09.2017
Sopharmacy 11 EOOD	73.03	72.96	07.12.2017
Sopharmacy 12 EOOD	73.03	72.96	07.12.2017
Sopharmacy 13 EOOD	73.03	72.96	07.12.2017
Sopharmacy 14 EOOD	73.03	72.96	07.12.2017
Sopharmacy 15 EOOD	73.03	72.96	07.12.2017
Sopharmacy 16 EOOD**	73.03	72.96	15.05.2018
Sopharmacy 17 EOOD**	73.03	72.96	15.05.2018
Sopharmacy 18 EOOD**	73.03	-	28.02.2019

\* *effective percentage of interest*

\*\* *indirect interest*

<b><i>Subsidiaries</i></b>	<b>30.06.2019</b>	<b>31.12.2018</b>	<b><i>Date of acquisition of control</i></b>	<b><i>Date of disposal of control</i></b>
<b><i>Companies abroad</i></b>	<b><i>Interest %</i></b>	<b><i>Interest %</i></b>		
SIA Briz	68.14	66.13	10.11.2009	
SOOO Brititrade **	54.51	52.90	10.11.2009	
PAO Vitamini	100.00	99.56	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**)	73.03	72.96	05.06.2015	
Sopharma Poland Z.O.O. – in liquidation	60.00	60.00	16.10.2003	
OOO Tabina **	54.66	53.05	08.04.2011	
SOOO Brizpharm **	56.42	35.85	20.12.2012	
OOO Sopharma Ukraine	100.00	100.00	07.08.2012	
OOO Farmacevt Plus **	41.28	40.72	31.05.2013	
UAB TBS Pharma**	34.75	33.73	01.03.2013	
TOO Sopharma Kazakhstan	100.00	100.00	06.11.2014	
OOO Galenapharm**	61.73	59.91	28.02.2015	
ODO Medjel**	55.87	54.23	28.02.2015	
ODO Alenpharm-plus**	62.68	55.54	30.06.2015	
OOO Farmatea**	-	35.80	30.11.2015	
ODO SalusLine**	52.47	50.92	18.11.2016	
Rap Pharma International OOD	51.00	51.00	14.04.2017	
ZAO Interpharm **	61.33	59.52	26.04.2017	
Sopharma Trading d.o.o. (Lekovit d.o.o.**)	73.03	51.07	09.08.2017	
OOO Zdorovej**	42.29	38.94	16.08.2017	
OOO Ivem&K**	-	29.65	16.08.2017	
OOO Ariens**	-	39.83	16.08.2017	
OOO Zabolivaya Apteka **	-	34.74	03.04.2018	
OOO Med-Dent **	-	46.29	16.08.2018	02.01.2019
BOOO SpetsAfarmacia **	47.70	46.29	16.08.2018	
OOO Bellerofon**	47.70	-	07.03.2019	
UAB Recessus	34.74	-	26.09.2019	

\* *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 Pharma Online 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 whereas the latter holds 100% of the capital of Sopharmacy 11 EOOD;
- Sopharmacy 12 EOOD is a subsidiary through Sopharma Trading AD whereas the latter holds 100% of the capital of Sopharmacy 12 EOOD;
- Sopharmacy 13 EOOD is a subsidiary through 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 whereas the latter holds 100% of the capital of Sopharmacy 14 EOOD;
- Sopharmacy 15 EOOD is a subsidiary through 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 whereas the latter holds 100% of the capital of Sopharmacy 16 EOOD;

- Sopharmacy 17 EOOD is a subsidiary through 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 whereas the latter holds 100% of the capital of Sopharmacy 18 EOOD;
- Sopharma Trading Pharmaceuticals is a subsidiary of 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 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 60.58% of the capital of OOO Farmacevt Plus;
- UAB TBS Pharma, Lithuania, is a subsidiary through SIA Briz, Latvia, whereas the latter holds 51% of the capital of UAB TBS Pharma;
- 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 13%, 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 – 25% of the capital of OOO Bellerofon.
- UAB Recessus, Lithuania is a subsidiary through SIA Briz, Latvia - SIA Briz holds 50.98% of UAB Recessus capital.

#### ***OTHER LONG-TERM EQUITY INVESTMENTS***

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

	<i>Country</i>	<i>30.09.2019</i> <i>BGN '000</i>	<i>Interest</i> <i>%</i>	<i>31.12.2018</i> <i>BGN '000</i>	<i>Interest</i> <i>%</i>
<b>Traded securities</b>					
Lavena AD	<i>Bulgaria</i>	4,711	12.62	3,616	10.89
Sopharma Properties REIT	<i>Bulgaria</i>	2,843	2.09	2,078	1.55
Olainfarm AD	<i>Latvia</i>	1,426	0.77	1,484	0.77
Achieve Life Sciences Inc. – USA	<i>USA</i>	141	0.53	83	0.53
Todorov AD	<i>Bulgaria</i>	102	12.45	182	10.94
BTF Expat Bulgaria	<i>Bulgaria</i>	5	0.01	59	0.17
Elana Agrocredit AD	<i>Bulgaria</i>	-	-	31	0.07
Other		16		5	
		<b>9,244</b>		<b>7,538</b>	
<b><i>Non-traded securities</i></b>					
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
OOO Aptekar - Centr	<i>Belarus</i>	24	0.14	24	0.14
OOO Medprostor	<i>Belarus</i>	-	-	546	19.00
Other		148		148	
Total		<b>514</b>		<b>1,060</b>	
		<b>9,758</b>		<b>8,598</b>	

As at 30 September 2019, as “others” are stated long-term equity investments at the amount of 169 thousand (31 December 2018: BGN 153 thousand) - very small minority interests of the Group in the capital of ten companies (31 December 2018: nine 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 financial statement for the first quarter of 2019.

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Ognian Donev, PhD  
Executive director