a)		ing managerial responsibilities/person closely associated			
	Name	Donev Investments Holding AD			
		[For natural persons: the first name and the last name(s).] [For legal persons: full name including legal form as provided for in the register where it is incorporated, if applicable.]			
2.	Reason for the notification				
a)	Position/status	Based on the provisions of art.3, para 1, item 26, letter "g" of Regulation 596/2014 as a person closely associated.			
		Ognian Donev is an Executive director and chairman of the Board of directors of Sopharma AD and chairman of the Board of directors of Donev Investments Holding AD			
		[For persons discharging managerial responsibilities: the position occupied within the issuer, emission allowance market participant/auction platform/auctioneer/auction monitor should be indicated, e.g. CEO, CFO.] [For persons closely associated, -An indication that the notification concerns a person closely associated with a person discharging managerial responsibilities;			
		- Name and position of the relevant person discharging managerial responsibilities.]			
b)	Initial notification/ Amendment	Initial notification [Indication that this is an initial notification or an amendment to prior notifications. In case of amendment, explain the error that this notification is amending.]			
3.	Dotails of the issuer omission	allowance market participant, auction platform, auctioneer or auction monitor			
	Name	Sopharma AD / Inc.number: 195-00-107/ 11.12.2023			
a)	Name				
		[Full name of the entity.]			
b)	LEI	097900BGGW0000048796			
		[Legal Entity Identifier code in accordance with ISO 17442 LEI code.]			
4.	place where transaction(s): s	nsaction(s): section to be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and (iv) each psactions have been conducted			
a)	Description of the financial	Shares, ISIN № BG11SOSOBT18			
u)	instrument, type of				
	instrument Identification	Indication as to the nature of the instrument — a share, a debt instrument, a derivative or a financial instrument linked to a share or a			
	code				
	code	<ul> <li>debt instrument;</li> <li>— an emission allowance, an auction product based on an emission allowance or a derivative relating to an emission allowance.</li> </ul>			
		Instrument identification code as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standard for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.			
b)	Nature of the transaction	600/2014.			
b)	Nature of the transaction				
		600/2014. Buy [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014. Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke			
b) c)	Nature of the transaction Price(s) and volume(s)	600/2014.         Buy         [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.         Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke         Price(s)       volume(s)			
		600/2014.         Buy         [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.         Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke         Price(s)       volume(s)         6,14       1 000,0			
		600/2014.         Buy         [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.         Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke         Price(s)       volume(s)         6,14       1 000,0         6,14       120,0			
		600/2014.         Buy         [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.         Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke         Price(s)       volume(s)         6,14       1000,0         6,14       120,0         6,14       11,0			
		600/2014.         Buy         [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.         Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke         Price(s)       volume(s)         6,14       1000,0         6,14       120,0         6,14       11,0         6,12       196,0			
		600/2014.         Buy         [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.         Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke         Price(s)       volume(s)         6,14       1000,0         6,14       120,0         6,14       11,0         6,12       196,0         300,0       300,0			
		600/2014.         Buy         [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.         Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke         Price(s)       volume(s)         6,14       1000,0         6,14       120,0         6,14       11,0         6,12       196,0         6,12       300,0         6,12       4 500,0			
		600/2014.         Buy         [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No         596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.         Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke         Price(s)       volume(s)         6,14       1000,0         6,14       120,0         6,12       196,0         6,12       300,0         6,12       4500,0         6,10       4794,0			
		600/2014.         Buy         [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014.         Second Seco			
		600/2014.         Buy         [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No         596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.         Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke         Price(s)       volume(s)         6,14       1000,0         6,14       120,0         6,14       11,0         6,12       196,0         6,12       196,0         6,12       196,0         6,13       196,0         6,14       120,0         6,15       196,0         6,16       196,0         6,17       196,0         6,18       196,0         6,19       5206,0         6,10       5206,0			
		600/2014.         Buy         [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014.         Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke         Price(s)       volume(s)         6,14       1000,0         6,14       120,0         6,12       196,0         6,12       300,0         6,12       4500,0         6,10       5206,0         6,10       5206,0         6,11       5206,0         6,12       500,0         6,13       5206,0         6,14       5200,0         6,12       300,0         6,12       300,0         6,13       5206,0         6,10       5206,0         6,11       500,0         6,12       300,0			
		600/2014.         Buy         [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014.         Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke         Price(s)       volume(s)         6,14       1000,0         6,14       120,0         6,12       196,0         6,12       300,0         6,12       4500,0         6,10       5266,0         6,10       5206,0         6,11       5206,0         6,12       300,0         6,13       5206,0         6,14       5200,0         6,12       300,0         6,13       5206,0         6,14       5206,0         6,10       5206,0         6,11       500,0         6,12       300,0         6,13       5206,0         6,14       5206,0         6,10       500,0         6,11       500,0         6,12       300,0         6,13       500,0         6,14       500,0			
		600/2014.         Buy         [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No         596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.         Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke         Price(s)       volume(s)         6,14       1000,0         6,14       120,0         6,14       120,0         6,12       196,0         6,12       196,0         6,12       196,0         6,12       196,0         6,10       5206,0         6,10       5206,0         6,10       5206,0         6,10       5206,0         6,10       5206,0         6,10       5206,0         6,10       5206,0         6,10       5000,0         6,10       5000,0         6,10       5000,0         6,10       5000,0         6,10       1500,0         6,10       3500,0			
		600/2014.           Buy           [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014.           Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke           Price(s)         volume(s)           6,14         1000,0           6,14         120,0           6,12         300,0           6,12         300,0           6,12         5206,0           6,10         5206,0           6,10         5206,0           6,11         5206,0           6,12         300,0           6,13         5206,0           6,10         5206,0           6,10         5206,0           6,11         5206,0           6,12         300,0           6,13         5206,0           6,10         5206,0           6,10         5206,0           6,10         5206,0           6,10         5206,0           6,10         3500,0           6,10         3500,0           6,10         3500,0           6,10         2			
		600/2014.           Buy           [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.           Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke           Price(s)         volume(s)           6,14         1200           6,14         1200           6,14         1200           6,14         1200           6,14         1200           6,14         1200           6,14         1200           6,14         1200           6,14         1200           6,12         196,0           6,12         196,0           6,12         196,0           6,12         300,0           6,12         300,0           6,10         5 206,0           6,10         5 206,0           6,10         5 000,0           6,10         3 500,0           6,10         3 500,0           6,10         3 500,0           6,10         3 500,0           6,10 <td< td=""></td<>			
		600/2014.         Buy         [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014.         Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke         Price(s)       volume(s)         6,14       1000,0         6,14       120,0         6,12       300,0         6,12       300,0         6,10       5 206,0         6,10       5 206,0         6,10       5 200,0         6,11       5 206,0         6,12       300,0         6,13       5 206,0         6,14       5 206,0         6,10       5 206,0         6,11       5 206,0         6,12       300,0         6,10       5 206,0         6,10       5 206,0         6,10       5 206,0         6,10       5 206,0         6,10       5 200,0         6,10       3 500,0         6,10       3 500,0         6,10       3 500,0         6,10       2 934,0			
		600/2014.           Buy           [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.           Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke           Price(s)         volume(s)           6,14         120, 6,14           6,14         120, 6,14           6,14         120, 6,14           6,14         120, 6,12           6,12         196, 6,12           6,14         120, 6,12           6,12         196, 6,10           6,13         300, 6,10           6,14         120, 6,10           6,10         5206, 6,10           6,11         5206, 6,10           6,12         300, 6,10           6,13         5206, 6,10           6,14         300, 6,10           6,15         3500, 6,10           6,16         3500, 6,11           6,17         3500, 6,14           6,18         3619, 793, 793, 793, 793, 793, 793, 793, 79			
		600/2014.           Buy           [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.           Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke           Price(s)         volume(s)           6,14         1200,           6,14         1200,           6,14         1200,           6,14         1200,           6,14         1200,           6,14         1200,           6,14         1200,           6,12         300,           6,12         300,           6,12         300,           6,12         300,           6,10         5206,           6,10         5206,           6,10         5206,           6,10         5206,           6,11         5206,           6,12         300,           6,12         300,           6,12         300,           6,12         3500,           6,10         3500,           6,11         3500,			
		600/2014.           Buy           [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.           Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke           Price(s)         volume(s)           6,14         1200,           6,14         1200,           6,14         1200,           6,14         1200,           6,14         1200,           6,14         1200,           6,14         1200,           6,12         300,           6,12         300,           6,12         300,           6,12         300,           6,10         5206,           6,10         5206,           6,10         5206,           6,10         5206,           6,11         5206,           6,12         300,           6,12         300,           6,12         300,           6,12         3500,           6,10         3500,           6,11         3500,			
		600/2014.           Buy           [Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.           Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linke           Price(s)         volume(s)           6,14         1000,0           6,14         120,0           6,14         120,0           6,14         120,0           6,14         120,0           6,14         120,0           6,14         120,0           6,14         120,0           6,12         300,0           6,12         300,0           6,12         300,0           6,12         300,0           6,10         5206,0           6,10         5206,0           6,10         5200,0           6,11         5206,0           6,12         300,0           6,13         5200,0           6,14         3500,0           6,14         3500,0           6,14         3500,0           6,14			

## NOTIFICATION OF INSIDERS' TRANSACTIONS under art. 19 of Regulation 596/2014

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		6,10	3 000,00		
		6,10	1 066,00		
		6,12	5 000,00		
		[Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on the same			
		Using the data standards for price and quantity, including where applicable the price currency and the quantity			
d)	Aggregated information	Price	volume		
		6,11	55 046,00		
		[The volumes of multip	ole transactions are aggregated when these transactions:		
	<ul> <li>Aggregated volume</li> </ul>	<ul> <li>relate to the same financial instrument or emission allowance;</li> </ul>			
	Price	ture;			
		<ul> <li>are executed on the</li> </ul>	e same day; and		
		<ul> <li>are executed on the same place of transaction.</li> </ul>			
		Using the data standar	d for quantity, including where applicable the quantity currency, as defined under		
		<ul> <li>In case of a single transaction, the price of the single transaction;</li> </ul>			
		<ul> <li>In case the volumes of multiple transactions are aggregated: the weighted average price of the aggregated</li> </ul>			
		Using the data standar	d for price, including where applicable the price currency, as defined under Commission		
e)	Date of the transaction	8.12.2023			
	[Date of the particular day of execution of the notified transaction.				
		Using the ISO 8601 date format: YYYY-MM-DD; UTC time.]			
f)	Place of the transaction	BSE AD			
		[Name and code to ide	ntify the MiFID trading venue, the systematic internaliser or the organised trading		
		if the transaction was r	not executed on any of the above mentioned venues, please mention 'outside a trading		