a)		ng 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 incorpora	ited, if	
		applicable.]		
	Reason for the notification	akk		
		Based on the provisions of art.3, para 1, item 26, letter "g" of Regulation 596/2014 as a person cl	osoly	
a)	Position/status	associated.	Usery	
			d also increase	
		Ognian Donev is an Executive director and chairman of the Board of directors of Sopharma AD ar	id chairman	
		of the Board of directors of Donev Investments Holding AD		
		[For persons discharging managerial responsibilities: the position occupied within the issuer, emissi		
		market participant/auction platform/auctioneer/auction monitor should be indicated, e.g. CEO, CFC	D.]	
		[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 amen	dment,	
		explain the error that this notification is amending.]		
3		allowance market participant, auction platform, auctioneer or auction monitor		
з. а)	Name	Sopharma AD / Inc.number: 195-00-77/ 26.9.2023		
		[Full name of the entity.]		
b) 4.	LEI	097900BGGW0000048796		
		[Legal Entity Identifier code in accordance with ISO 17442 LEI code.]		
	Details of the transaction(s): s	ection to be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and	(iv) each	
	place where transactions have	been conducted		
a)	Description of the financial	Warrants, ISIN № BG9200001212		
	instrument, type of	Indication as to the nature of the instrument		
	instrument Identification	<ul> <li>a share, a debt instrument, a derivative or a financial instrument linked</li> </ul>	o a share or	
	code	debt instrument;		
		<ul> <li>— an emission allowance, an auction product based on an emission a</li> </ul>	llowance or	
			nowance of	
		derivative relating to an emission allowance.	na Dogulatio	
		Instrument identification code as defined under Commission Delegated Regulation supplement		
		(EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory techr		
		for the recenting of the constitute to construct with with a clouted under Article 3C of Decul		
		for the reporting of transactions to competent authorities adopted under Article 26 of Regul		
		for the reporting of transactions to competent authorities adopted under Article 26 of Regul 600/2014.		
b)	Nature of the transaction			
b)	Nature of the transaction	600/2014.	ation (EU) N	
b)	Nature of the transaction	600/2014. Sell	ation (EU) N	
b)	Nature of the transaction	600/2014. Sell [Description of the transaction type using, where applicable, the type of transaction identified in Art	ation (EU) N	
b)	Nature of the transaction	600/2014. Sell [Description of the transaction type using, where applicable, the type of transaction identified in Art Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.	ation (EU) N icle 10 of the J) No	
		600/2014. Sell [Description of the transaction type using, where applicable, the type of transaction identified in Art Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU 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 transa	ation (EU) N icle 10 of the J) No	
b) c)	Nature of the transaction Price(s) and volume(s)	600/2014. Sell [Description of the transaction type using, where applicable, the type of transaction identified in Art Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU 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 Price(s) volume(s)	ation (EU) N icle 10 of the J) No action is linke	
		600/2014. Sell [Description of the transaction type using, where applicable, the type of transaction identified in Art Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU 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 Price(s) volume(s) 1,39	ation (EU) N icle 10 of the J) No action is linke 10 000,0	
		600/2014. Sell [Description of the transaction type using, where applicable, the type of transaction identified in Art Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU 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 Price(s) volume(s) 1,39 1,41	ation (EU) N icle 10 of the J) No action is linke 10 000,0 8 000,0	
		600/2014. Sell [Description of the transaction type using, where applicable, the type of transaction identified in Art Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU 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 transa Price(s) Volume(s) 1,39 1,41 1,33	ation (EU) N icle 10 of the J) No action is linke 10 000,0 8 000,0 1 000,0	
		600/2014. Sell [Description of the transaction type using, where applicable, the type of transaction identified in Art Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU 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 transa Price(s) volume(s) 1,39 1,41 1,33 1,35	ation (EU) N icle 10 of the J) No action is linke 10 000, 8 000, 1 000, 1 950,	
		600/2014. Sell [Description of the transaction type using, where applicable, the type of transaction identified in Art Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU 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 Price(s) volume(s) 1,39 1,41 1,33 1,35 1,38	ation (EU) N icle 10 of the J) No action is linke <u>10 000,(</u> 8 000,( 1 000,( 1 950,( 1 000,(	
		600/2014. Sell [Description of the transaction type using, where applicable, the type of transaction identified in Art Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU 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 transa Price(s) volume(s) 1,39 1,41 1,33 1,35	ation (EU) N icle 10 of the J) No action is linke 10 000,( 8 000,( 1 000,( 1 950,(	
		600/2014. Sell [Description of the transaction type using, where applicable, the type of transaction identified in Art Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU 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 transac Price(s) volume(s) 1,39 1,41 1,33 1,35 1,38 1,35	ation (EU) N icle 10 of the J) No action is linke 10 000, 8 000, 1 000, 1 950, 1 000, 200,	
		600/2014. Sell [Description of the transaction type using, where applicable, the type of transaction identified in Art Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU 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 Price(s) volume(s) 1,39 1,41 1,33 1,35 1,38 1,35 [Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on t	ation (EU) N icle 10 of the J) No action is linke 10 000, 8 000, 1 000, 1 950, 1 000, 200, ne same	
		600/2014. Sell [Description of the transaction type using, where applicable, the type of transaction identified in Art Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU 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 transac Price(s) volume(s) 1,39 1,41 1,33 1,35 1,38 1,35	ation (EU) N icle 10 of the J) No action is linke 10 000, 8 000, 1 000, 1 950, 1 000, 200, ne same	
		600/2014. Sell [Description of the transaction type using, where applicable, the type of transaction identified in Art Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU 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 Price(s) volume(s) 1,39 1,41 1,33 1,35 1,38 1,35 [Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on t	ation (EU) N icle 10 of the J) No action is linke 10 000, 8 000, 1 000, 1 950, 1 000, 200, ne same	
c)	Price(s) and volume(s)	600/2014. Sell [Description of the transaction type using, where applicable, the type of transaction identified in Art Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU S96/2014 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 transa Price(s) volume(s) 1,39 1,41 1,33 1,35 1,38 1,35 [Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on t Using the data standards for price and quantity, including where applicable the price currency and t	ation (EU) N icle 10 of the J) No action is linke 10 000, 8 000, 1 000, 1 950, 1 000, 200, he same he quantity	
c)	Price(s) and volume(s)	600/2014. Sell [Description of the transaction type using, where applicable, the type of transaction identified in Art Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU 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 transac Price(s) volume(s) 1,39 1,41 1,33 1,35 1,35 [Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on t Using the data standards for price and quantity, including where applicable the price currency and t Price volume 1,39	ation (EU) N icle 10 of the J) No action is linke 10 000, 8 000, 1 000, 1 950, 1 000, 2 200, he same he quantity	
c)	Price(s) and volume(s) Aggregated information	600/2014.         Sell         [Description of the transaction type using, where applicable, the type of transaction identified in Art         Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU)         S96/2014 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 transactor         Price(s)       volume(s)         1,33         1,41         1,33         1,34         1,35         1,38         1,35         (Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on t         Using the data standards for price and quantity, including where applicable the price currency and t         Price       volume         1,39         [The volumes of multiple transactions are aggregated when these transactions:	ation (EU) N icle 10 of the J) No action is linke 10 000, 8 000, 1 000, 1 950, 1 000, 2 200, he same he quantity	
c)	Price(s) and volume(s) Aggregated information — Aggregated volume —	600/2014.         Sell         [Description of the transaction type using, where applicable, the type of transaction identified in Art         Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU)         S96/2014 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 transact         Price(s)       volume(s)         1,39         1,41         1,33         1,34         1,35         It is a standards for price and quantity, including where applicable the price currency and the same nature (purchases, sales, lendings, borrows,) on t         Using the data standards for price and quantity, including where applicable the price currency and the same standards for price and quantity, including where applicable the price currency and the same standards are aggregated when these transactions:         -       relate to the same financial instrument or emission allowance;	ation (EU) № icle 10 of the J) No action is linke 10 000, 8 000, 1 000, 1 950, 1 000, 2 00, he same he quantity	
c)	Price(s) and volume(s) Aggregated information	600/2014.         Sell         [Description of the transaction type using, where applicable, the type of transaction identified in Art         Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU)         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 transact         Price(s)       volume(s)         1,39         1,41         1,33         1,34         1,35         It is a standards for price and quantity, including where applicable the price currency and the same nature (purchases, sales, lendings, borrows,) on t         Using the data standards for price and quantity, including where applicable the price currency and the same standards for price and quantity, including where applicable the price currency and the same financial instrument or emission allowance;         -       relate to the same nature;	ation (EU) N icle 10 of the J) No action is linke 10 000, 8 000, 1 000, 1 950, 1 000, 2 200, he same he quantity	
c)	Price(s) and volume(s) Aggregated information — Aggregated volume —	600/2014.         Sell         [Description of the transaction type using, where applicable, the type of transaction identified in Art         Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU         S96/2014 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 transact         Price(s)       volume(s)         1,39         1,41         1,33         1,34         1,35         1,38         1,39         (Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on t         Using the data standards for price and quantity, including where applicable the price currency and t         Price       volume         1,39         [The volumes of multiple transactions are aggregated when these transactions:         - relate to the same financial instrument or emission allowance;         - are of the same nature;         - are of the same day; and	ation (EU) N icle 10 of the J) No action is linke 10 000, 8 000, 1 000, 1 950, 1 000, 2 200, he same he quantity	
c)	Price(s) and volume(s) Aggregated information — Aggregated volume —	600/2014.         Sell         [Description of the transaction type using, where applicable, the type of transaction identified in Art         Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU         S96/2014 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 (EU) no 596/2014, it shall be indicated whether the transaction 1,39         1,39         1,41         1,33         1,34         1,35         Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on t         Using the data standards for price and quantity, including where applicable the price currency and t         Price       volume         1,39         [The volumes of multiple transactions are aggregated when these transactions:         - relate to the same financial instrument or emission allowance;         - are of the same nature;         - are executed on the same day; and         - are executed on the same place of transaction.	ation (EU) N icle 10 of the J) No action is linke 10 000, 8 000, 1 000, 1 950, 1 000, 200, 1 000, 200, he same he quantity 22 150,	
c)	Price(s) and volume(s) Aggregated information — Aggregated volume —	600/2014.         Sell         [Description of the transaction type using, where applicable, the type of transaction identified in Art         Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU         S96/2014 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 (EU) and the transaction of the same nature (purchases, sales, lendings, borrows,) on to the transaction of the same nature (purchases, sales, lendings, borrows,) on to the transaction of the same nature (purchases, sales, lendings, borrows,) on the transaction of the same nature (purchases, sales, lendings, borrows,) on the transaction of the same nature (purchases, sales, lendings, borrows,) on the transaction of the same nature (purchases, sales, lendings, borrows,) on the transaction of the same nature (purchases, sales, lendings, borrows,) on the transaction of the same nature (purchases, sales, lendings, borrows,) on the transaction of the same nature (purchases, sales, lendings, borrows,) on the transaction of transaction are aggregated when these transactions:         Price       volume         1,39       vol	ation (EU) N icle 10 of the J) No action is linke 10 000, 8 000, 1 000, 1 950, 1 000, 200, 1 000, 200, he same he quantity 22 150,	
c)	Price(s) and volume(s) Aggregated information — Aggregated volume —	600/2014.         Sell         [Description of the transaction type using, where applicable, the type of transaction identified in Art         Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU         S96/2014 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 transact         Price(s)       volume(s)         1,39         1,41         1,33         1,34         1,35         1,36         1,37         1,38         1,39         1,39         1,31         1,32         1,33         1,33         1,33         1,33         1,33         1,33         1,33         1,33         1,33         1,34         1,35         1,36         1,37         IWhere more than one transaction of the same nature (purchases, sales, lendings, borrows,) on t         Using the data standards for price and quantity, including where applicable the price currency and the Price volume         1,39         [The volumes of multiple transactions	ation (EU) N icle 10 of the J) No action is linke 10 000, 8 000, 1 000, 1 950, 1 000, 200, 1 000, 200, he same he quantity 22 150,	
c)	Price(s) and volume(s) Aggregated information — Aggregated volume —	600/2014.         Sell         [Description of the transaction type using, where applicable, the type of transaction identified in Art         Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU         S96/2014 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 (EU) and the transaction of the same nature (purchases, sales, lendings, borrows,) on to the transaction of the same nature (purchases, sales, lendings, borrows,) on to the transaction of the same nature (purchases, sales, lendings, borrows,) on the transaction of the same nature (purchases, sales, lendings, borrows,) on the transaction of the same nature (purchases, sales, lendings, borrows,) on the transaction of the same nature (purchases, sales, lendings, borrows,) on the transaction of the same nature (purchases, sales, lendings, borrows,) on the transaction of the same nature (purchases, sales, lendings, borrows,) on the transaction of the same nature (purchases, sales, lendings, borrows,) on the transaction of transaction are aggregated when these transactions:         Price       volume         1,39       vol	ation (EU) N icle 10 of the J) No action is linke 10 000, 8 000, 1 000, 1 950, 1 000, 200, 1 000, 200, he same he quantity 22 150,	

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

		Using the data standard for price, including where applicable the price currency, as defined under Commission	
e)	Date of the transaction	25.9.2023	
		[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 identify the MiFID trading venue, the systematic internaliser or the organised trading	
		if the transaction was not executed on any of the above mentioned venues, please mention 'outside a trading	