

Annex 9

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

Facts and circumstances to disclosed

as at 31.03.2021 for issuers

Sopharma Group

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.

On March 15, 2021 at its meeting the Board of Directors of the Company decided to conclude a general policy agreement for the management of “Momina Krepost” AD with “Medical Consumables” OOD holding 56.59% of the votes in the General Meeting of “Momina Krepost” AD by joint exercise of voting rights. The parties will coordinate their actions on all significant issues concerning the company's activities, such as transformation or termination of the company, changes in the amount of the company's capital, amendments or supplements to the Articles of Association, changes in the composition of management bodies, staff and conditions on employment contracts, the main activity and the financial strategy of the company, etc.

1.10. There is no change in the company's auditors and no reasons for the change.

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:

Subsidiaries	31.03.2021	31.03.2020	Date of acquisition of control	Date of acquisition of control / inflowing
Companies in Bulgaria	Interest %	Interest %		
“Sopharma Trading” AD*	76.17	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	60.93	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	

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"Aromania" AD	-	76.00	31.07.2017	23.12.2020
"Sopharmacy" EOOD**	76.17	74.23	19.01.2015	
"Sopharmacy 2" EOOD**	76.17	74.23	05.06.2015	
"Sopharmacy 3" EOOD**	76.17	74.23	02.12.2015	
"Sopharmacy 4" EOOD**	76.17	74.23	29.02.2016	
"Sopharmacy 5" EOOD**	76.17	74.23	01.03.2016	
"Sopharmacy 6" EOOD**	76.17	74.23	03.12.2015	
"Sopharmacy 7" EOOD**	76.17	74.23	15.03.2017	
"Sopharmacy 8" EOOD**	76.17	74.23	27.06.2017	
"Sopharmacy 9" EOOD**	76.17	74.23	11.09.2017	
"Sopharmacy 10" EOOD**	76.17	74.23	11.09.2017	
"Sopharmacy 11" EOOD	76.17	74.23	07.12.2017	
"Sopharmacy 12" EOOD	76.17	74.23	07.12.2017	
"Sopharmacy 13" EOOD	76.17	74.23	07.12.2017	
"Sopharmacy 14" EOOD	76.17	74.23	07.12.2017	
"Sopharmacy 15" EOOD	76.17	74.23	07.12.2017	
"Sopharmacy 16" EOOD **	76.17	74.23	15.05.2018	
"Sopharmacy 17" EOOD **	76.17	74.23	15.05.2018	
"Sopharmacy 18" EOOD **	76.17	74.23	28.02.2019	
"Sanita Franchising" AD**	76.17	-	01.10.2020	
"Sopharmacy 19" EOOD (Valentina Vasileva – Lyulin EOOD) **	76.17	-	01.10.2020	
"Sopharmacy 20" EOOD (Vasilka Lilovska EOOD) **	76.17	-	01.10.2020	
"Sopharmacy 21" EOOD (Venera Mutashka EOOD) **	76.17	-	01.10.2020	
"Sopharmacy 22" EOOD (Veselka Vasileva EOOD) **	76.17	-	01.10.2020	
"Sopharmacy 23" EOOD (Victoria Angelova EOOD) **	76.17	-	01.10.2020	
"Sopharmacy 24" EOOD (Desislava Jordanova EOOD) **	76.17	-	01.10.2020	
"Sopharmacy 25" EOOD (Dimka Vladeva EOOD) **	76.17	-	01.10.2020	
"Sopharmacy 26" EOOD (Donka Chivganova EOOD) **	76.17	-	01.10.2020	
"Sopharmacy 27" EOOD (Ekaterina Mihaylova – Shumen 1 EOOD) **	76.17	-	01.10.2020	
"Sopharmacy 19" EOOD (Valentina Vasileva – Lyulin EOOD) **	76.17	-	01.10.2020	
"Sopharmacy 20" EOOD (Vasilka Lilovska EOOD) **	76.17	-	01.10.2020	
"Sopharmacy 21" EOOD (Venera Mutashka EOOD) **	76.17	-	01.10.2020	
"Sopharmacy 22" EOOD (Veselka Vasileva EOOD) **	76.17	-	01.10.2020	
"Sopharmacy 23" EOOD (Victoria Angelova EOOD) **	76.17	-	01.10.2020	

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“Sopharmacy 24” EOOD (Desislava Jordanova EOOD) **	76.17	-	01.10.2020
“Sopharmacy 25” EOOD (Dimka Vladeva EOOD) **	76.17	-	01.10.2020
“Sopharmacy 26” EOOD (Donka Chivganova EOOD) **	76.17	-	01.10.2020
“Sopharmacy 27” EOOD (Ekaterina Mihaylova – Shumen 1 EOOD) **	76.17	-	01.10.2020
“Sopharmacy 28” EOOD (Elka Neykova EOOD) **	76.17	-	01.10.2020
“Sopharmacy 29” EOOD (Emilia Angelova EOOD) **	76.17	-	01.10.2020
“Sopharmacy 30” EOOD (Juliana Kotova EOOD) **	76.17	-	01.10.2020
“Sopharmacy 31” EOOD (Ivan Ivanov 1 EOOD) **	76.17	-	01.10.2020
“Sopharmacy 32” EOOD (Iliana Kalushkova EOOD) **	76.17	-	01.10.2020
“Sopharmacy 33” EOOD (Irina Toncheva EOOD) **	76.17	-	01.10.2020
“Sopharmacy 34” EOOD (Kapka Nikolova – Military Hospital EOOD) **	76.17	-	01.10.2020
“Sopharmacy 35” EOOD (Kostadin Gorchev EOOD) **	76.17	-	01.10.2020
“Sopharmacy 36” EOOD (Krasimira Shunina EOOD) **	76.17	-	01.10.2020
“Sopharmacy 37” EOOD (Lora Doncheva EOOD) **	76.17	-	01.10.2020
“Sopharmacy 38” EOOD (Lyudmila Zlatkova EOOD) **	76.17	-	01.10.2020
“Sopharmacy 39” EOOD (Lyudmila Kovacheva EOOD) **	76.17	-	01.10.2020
“Sopharmacy 40” EOOD (Manik Burgazyan EOOD) **	76.17	-	01.10.2020
“Sopharmacy 41” EOOD (Mariyka Jaigarova EOOD) **	76.17	-	01.10.2020
“Sopharmacy 42” EOOD (Mariya Agova EOOD) **	76.17	-	01.10.2020
“Sopharmacy 43” EOOD (Mariya Gancheva EOOD) **	76.17	-	01.10.2020
“Sopharmacy 44” (Maria Kenova EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 45” (Maria Hristova – Motopista EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 46” (Mariana Markova EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 47” (Mery Ivanova EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 48” (Nelly Stavreva EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 49”(Preslava Becheva EOOD) **	76.17	76.17	01.10.2020

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“Sopharmacy 50” (Rayna Madzharova – St. Georgi Sofiyiski EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 51” (Rumyana Ignatova – Gancheva EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 52” (Sashka Todorova EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 53” (Svetlana Harizanova EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 54” (Svetlana Pirpidonova EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 55” (Ceiba-Blagoevgrad-1 EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 56” (Silvia Veneva EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 57” (Siyana Milanova EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 58” (Stoyanka Radenkova EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 59” (Ana Avdzhieva EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 60” (Radina Bekova EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 61” (Rumen Raynov EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 62” (Hani Modhi EOOD) **	76.17	76.17	01.10.2020
“Sopharmacy 63” (SCS Franchise EAD)	76.17	76.17	01.10.2020
* effective percentage of interest			
* indirect interest			

<i>Subsidiaries</i>	<i>31.03.2021</i>	<i>31.12.2020</i>	<i>Date of acquisition of control</i>	<i>Date of release from control / inflowing</i>
<i>Companies abroad</i>	<i>Interest %</i>	<i>Interest %</i>		
SIA “Briz”	100.00	100.00	10.11.2009	
SOOO “Brititrade” **	80.00	80.00	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**)	-	-	05.06.2015	04.08.2020
“Sopharma Poland” Z.O.O. – in liquidation	60.00	60.00	16.10.2003	
OOO “Tabina” **	80.22	80.22	08.04.2011	
SOOO “Brizpharm” **	-	-	20.12.2012	31.01.2020
OOO “Sopharma Ukraine”	100.00	100.00	07.08.2012	
OOO “Farmaceut Plus” **	63.09	59.08	31.05.2013	
TOO “Sopharma Kazakhstan”	100.00	100.00	06.11.2014	
OOO “Galenapharm”**	90.60	90.60	28.02.2015	

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ODO "Medjel"***	82.00	82.00	28.02.2015
ODO "Alenpharm-plus"***	91.98	91.98	30.06.2015
ODO SalusLine**	77.00	77.00	18.11.2016
"Rap Pharma International" OOD	80.00	80.00	14.04.2017
ZAO "Interpharm" **	90.00	90.00	26.04.2017
"Sopharma Trading" d.o.o. (Lekovit d.o.o.**)	76.17	76.17	09.08.2017
OOO "Zdorovei" **	70.10	66.85	16.08.2017
BOOO "SpecApharmatsia" **	70.00	70.00	16.08.2018
OOO "Bellerofon" **	85.80	85.80	07.03.2019
UAB "Receus" **	50.98	50.98	26.09.2019
OOO "Zdorovei Pharm" **	45.57	43.46	02.03.2020
"Pharmachim" EOOD	100.00	100.00	14.04.2020
SIA "Briz Trading" **	100.00	-	15.02.2021

* *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;
- "Soparmacy" EOOD is a subsidiary of "Sopharma Trading" AD whereas the latter holds 100% of the capital of "Soparmacy" EOOD;
- "Soparmacy 2" EOOD is a subsidiary of "Soparmacy" EOOD whereas the latter holds 100% of the capital of "Soparmacy 2" EOOD;
- "Soparmacy 3" EOOD is a subsidiary of "Soparmacy" EOOD whereas the latter holds 100% of the capital of "Soparmacy 3" EOOD;
- "Soparmacy 4" EOOD is a subsidiary of "Soparmacy" EOOD whereas the latter holds 100% of the capital of "Soparmacy 4" EOOD;
- "Soparmacy 5" EOOD is a subsidiary of "Soparmacy" EOOD whereas the latter holds 100% of the capital of "Soparmacy 5" EOOD;
- "Soparmacy 6" EOOD is a subsidiary of "Soparmacy" EOOD whereas the latter holds 100% of the capital of „Soparmacy 6“ EOOD;
- "Soparmacy 7" EOOD is a subsidiary of "Soparmacy" EOOD whereas the latter holds 100% of the capital of "Soparmacy 7" EOOD;
- "Soparmacy 8" EOOD is a subsidiary of "Soparmacy" EOOD whereas the latter holds 100% of the capital of "Soparmacy 8" EOOD;
- "Soparmacy 9" EOOD is a subsidiary of "Soparmacy" EOOD whereas the latter holds 100% of the capital of "Soparmacy 9" EOOD;
- "Soparmacy 10" EOOD is a subsidiary of "Soparmacy" EOOD whereas the latter holds 100% of the capital of " "Soparmacy 10" EOOD;
- "Soparmacy 11" EOOD is a subsidiary through "Sopharma Trading" AD whereas the latter holds 100% of the capital of "Soparmacy 11" EOOD;
- "Soparmacy 12" EOOD is a subsidiary through "Sopharma Trading" AD whereas the latter holds 100% of the capital of "Soparmacy 12" EOOD;

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- “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;
- “Sopharmacy 63” EAD is a subsidiary through Sopharma Trading AD whereas the latter holds 100% of the capital of “Sopharmacy 63” EAD;
- “Sanita Franchising” AD is a subsidiary through “Sopharma Trading” AD whereas the latter holds 100% of the capital of Sanita Franchising AD;
- “Sopharmacy 32” EOOD is a subsidiary through “Sopharmacy 63” EAD whereas the latter holds 100% of the capital of “Sopharmacy 32” EOOD;
- “Sopharmacy 59” EOOD is a subsidiary through “Sopharmacy 63” EAD whereas the latter holds 100% of the capital of “Sopharmacy 59” EOOD;
- “Sopharmacy 60” EOOD is a subsidiary through “Sopharmacy 63” EAD whereas the latter holds 100% of the capital of “Sopharmacy 60” EOOD;
- “Sopharmacy 61” EOOD is a subsidiary through “Sopharmacy 63” EAD whereas the latter holds 100% of the capital of “Sopharmacy 61” EOOD;
- “Sopharmacy 62” EOOD is a subsidiary through “Sopharmacy 63” EAD whereas the latter holds 100% of the capital of “Sopharmacy 62” EOOD;
- “Sopharmacy 40” EOOD is a subsidiary through “Sopharmacy 63” EAD whereas the latter holds 100% of the capital of “Sopharmacy 40” EOOD;
- “Sopharmacy 30” EOOD is a subsidiary through “Sopharmacy 61” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 30” EOOD;
- “Sopharmacy 33” EOOD is a subsidiary through “Sopharmacy 61” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 33” EOOD;
- “Sopharmacy 19” EOOD is a subsidiary through “Sopharmacy 61” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 19” EOOD;
- “Sopharmacy 48” EOOD is a subsidiary through “Sopharmacy 61” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 48” EOOD;
- “Sopharmacy 31” EOOD is a subsidiary through “Sopharmacy 60” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 31” EOOD;
- “Sopharmacy 55” EOOD is a subsidiary through “Sopharmacy 60” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 55” EOOD;
- “Sopharmacy 41” EOOD is a subsidiary through “Sopharmacy 60” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 41” EOOD;

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- “Sopharmacy 58” EOOD is a subsidiary through “Sopharmacy 60” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 58” EOOD;
- “Sopharmacy 28” EOOD is a subsidiary through “Sopharmacy 60” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 28” EOOD;
- “Sopharmacy 50” EOOD is a subsidiary through “Sopharmacy 60” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 50” EOOD;
- “Sopharmacy 51” EOOD is a subsidiary through “Sopharmacy 60” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 51” EOOD;
- “Sopharmacy 20” EOOD is a subsidiary through “Sopharmacy 59” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 20” EOOD;
- “Sopharmacy 29” EOOD is a subsidiary through “Sopharmacy 59” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 29” EOOD;
- “Sopharmacy 54” EOOD is a subsidiary through “Sopharmacy 59” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 54” EOOD;
- “Sopharmacy 42” EOOD is a subsidiary through “Sopharmacy 59” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 42” EOOD;
- “Sopharmacy 46” EOOD is a subsidiary through “Sopharmacy 59” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 46” EOOD;
- “Sopharmacy 23” EOOD is a subsidiary through “Sopharmacy 59” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 23” EOOD;
- “Sopharmacy 56” EOOD is a subsidiary through “Sopharmacy 59” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 56” EOOD;
- “Sopharmacy 35” EOOD is a subsidiary through “Sopharmacy 59” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 35” EOOD;
- “Sopharmacy 34” EOOD is a subsidiary through “Sopharmacy 59” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 34” EOOD;
- “Sopharmacy 47” EOOD is a subsidiary through “Sopharmacy 59” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 47” EOOD;
- “Sopharmacy 39” EOOD is a subsidiary through “Sopharmacy 59” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 39” EOOD;
- “Sopharmacy 22” EOOD is a subsidiary through “Sopharmacy 59” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 22” EOOD;
- “Sopharmacy 52” EOOD is a subsidiary through “Sopharmacy 59” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 52” EOOD;
- “Sopharmacy 57” EOOD is a subsidiary through “Sopharmacy 59” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 57” EOOD;
- “Sopharmacy 27” EOOD is a subsidiary through “Sopharmacy 59” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 27” EOOD;
- “Sopharmacy 25” EOOD is a subsidiary through “Sopharmacy 40” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 25” EOOD;
- “Sopharmacy 49” EOOD is a subsidiary through “Sopharmacy 40” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 49” EOOD;

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- “Sopharmacy 36” EOOD is a subsidiary through “Sopharmacy 40” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 36” EOOD;
- “Sopharmacy 21” EOOD is a subsidiary through “Sopharmacy 40” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 21” EOOD;
- “Sopharmacy 24” EOOD is a subsidiary through “Sopharmacy 40” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 24” EOOD;
- “Sopharmacy 45” EOOD is a subsidiary through “Sopharmacy 40” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 45” EOOD;
- “Sopharmacy 44” EOOD is a subsidiary through “Sopharmacy 40” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 44” EOOD;
- “Sopharmacy 38” EOOD is a subsidiary through “Sopharmacy 40” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 38” EOOD;
- “Sopharmacy 53” EOOD is a subsidiary through “Sopharmacy 40” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 53” EOOD;
- “Sopharmacy 26” EOOD is a subsidiary through “Sopharmacy 40” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 26” EOOD;
- “Sopharmacy 43” EOOD is a subsidiary through “Sopharmacy 40” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 43” EOOD;
- “Sopharmacy 37” EOOD is a subsidiary through “Sopharmacy 40” EOOD, whereas the latter holds 100% of the capital of “Sopharmacy 37” EOOD;
- “Sopharma Trading” d.o.o., Serbia 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”;
- 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 53% and SOOO “Brititrade” holds 47% 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 40% 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”;

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- 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 “SpetsAfarnatsia”, 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 “SpetsAfarnatsia”;
- OOO “Bellerofon”, Belarus, is a subsidiary through SIA “Briz”, Latvia, and its subsidiary SOOO “Brititrade”, Belarus – SIA “Briz” holds 29%, 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”;
- OOO “Zdorovei Pharm”, Belarus is a subsidiary through OOO “Zdorovei”, Belarus – the latter holds 65% in the capital of OOO “Zdorovei Pharm”.
- SIA “Briz Trading”, Latvia is a subsidiary through SIA “Briz”, Latvia - SIA “Briz” owns 100% of the capital of SIA “Briz Trading”.

The core business activities of the Group companies are focused on the pharmaceutical sector except for separate companies having business activities also in the field of investment in real estate and securities.

The parent company holds a permit for production/import of pharmaceuticals No BG/MIA - 0081/31 January 2019, issued by the Bulgarian Drug Agency (BDA).

The core business activities of the companies within the Group are as follows:

- “Sopharma” AD – production and trade in medicinal substances (active ingredients) and finished drug forms; research and development activities in the field of medicinal products;
- “Sopharma Trading” AD – trade in pharmaceutical products;
- “Biopharm Engineering” AD – production and trade in infusion solutions;
- “Pharmalogistica” AD – secondary packaging of pharmaceutical products and real estate leases;
- “Electroncommerce” EOOD – trade, transportation and packaging of radioactive materials and nuclear equipment for medicinal use, household electronics and electrical equipment;
- “Sopharma Buildings” REIT – investment of funds, accumulated by issuance of securities, in real estate (securitisation of real estate) through purchase of property rights and other proprietary over real estate, rent-out, lease, and/or sale;
- “Phyto Palauzovo” AD – production, harvesting, purchase, growing and trade in herbs and medicinal plants;
- “Veta Pharma” AD – production of medicinal, non-medicinal and other products;
- “Sopharmacy” EOOD – franchising, know-how, renting of property, trade and other;
- “Sopharmacy 2” EOOD – retail trade in medicinal products;

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In case of divergence Bulgarian text should prevail.

- “Sopharmacy 3” EOOD – retail trade in medicinal products;
- “Sopharmacy 4” EOOD – retail trade in medicinal products;
- “Sopharmacy 5” EOOD – retail trade in medicinal products;
- “Sopharmacy 6” EOOD – online and off-line retail trade in medicinal products;
- “Sopharmacy 7” EOOD – retail trade in medicinal products;
- “Sopharmacy 8” EOOD – retail trade in medicinal products;
- “Sopharmacy 9” EOOD – retail trade in medicinal products;
- “Sopharmacy 10” EOOD – retail trade in medicinal products;
- “Sopharmacy 11” EOOD – retail trade in medicinal products;
- “Sopharmacy 12” EOOD – retail trade in medicinal products;
- “Sopharmacy 13” EOOD – retail trade in medicinal products;
- “Sopharmacy 14” EOOD – retail trade in medicinal products;
- “Sopharmacy 15” EOOD – retail trade in medicinal products;
- “Sopharmacy 16” EOOD – retail trade in medicinal products;
- “Sopharmacy 17” EOOD – retail trade in medicinal products;
- “Sopharmacy 18” EOOD – retail trade in medicinal products
- ***“Sanita Franchising” AD – retail trade in medicinal products, franchising and other services;***
- ***“Sopharmacy 19” EOOD - retail trade in medicinal products;***
- “Sopharmacy 20” EOOD - retail trade in medicinal products;
- “Sopharmacy 21” EOOD - retail trade in medicinal products;
- “Sopharmacy 22” EOOD - retail trade in medicinal products;
- “Sopharmacy 23” EOOD - retail trade in medicinal products;
- “Sopharmacy 24” EOOD - retail trade in medicinal products;
- “Sopharmacy 25” EOOD - retail trade in medicinal products;
- “Sopharmacy 26” EOOD - retail trade in medicinal products;
- “Sopharmacy 27” EOOD - retail trade in medicinal products;
- “Sopharmacy 28” EOOD - retail trade in medicinal products;
- “Sopharmacy 29” EOOD - retail trade in medicinal products;
- “Sopharmacy 30” EOOD - retail trade in medicinal products;
- “Sopharmacy 31” EOOD - retail trade in medicinal products;
- “Sopharmacy 32” EOOD - retail trade in medicinal products;
- “Sopharmacy 33” EOOD - retail trade in medicinal products;
- “Sopharmacy 34” EOOD - retail trade in medicinal products;
- “Sopharmacy 35” EOOD - retail trade in medicinal products;
- “Sopharmacy 36” EOOD - retail trade in medicinal products;
- “Sopharmacy 37” EOOD - retail trade in medicinal products;
- “Sopharmacy 38” EOOD - retail trade in medicinal products;
- “Sopharmacy 39” EOOD - retail trade in medicinal products;
- “Sopharmacy 40” EOOD - retail trade in medicinal products;
- “Sopharmacy 41” EOOD - retail trade in medicinal products;
- “Sopharmacy 42” EOOD - retail trade in medicinal products;

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- “Sopharmacy 43” EOOD - retail trade in medicinal products;
- “Sopharmacy 44” EOOD - retail trade in medicinal products;
- “Sopharmacy 45” EOOD - retail trade in medicinal products;
- “Sopharmacy 46” EOOD - retail trade in medicinal products;
- “Sopharmacy 47” EOOD - retail trade in medicinal products;
- “Sopharmacy 48” EOOD - retail trade in medicinal products;
- “Sopharmacy 49” EOOD - retail trade in medicinal products;
- “Sopharmacy 50” EOOD - retail trade in medicinal products;
- “Sopharmacy 51” EOOD - retail trade in medicinal products;
- “Sopharmacy 52” EOOD - retail trade in medicinal products;
- “Sopharmacy 53” EOOD - retail trade in medicinal products;
- “Sopharmacy 54” EOOD - retail trade in medicinal products;
- “Sopharmacy 55” EOOD - retail trade in medicinal products;
- “Sopharmacy 56” EOOD - retail trade in medicinal products;
- “Sopharmacy 57” EOOD - retail trade in medicinal products;
- “Sopharmacy 58” EOOD - retail trade in medicinal products;
- “Sopharmacy 59” EOOD - retail trade in medicinal products;
- “Sopharmacy 60” EOOD - retail trade in medicinal products;
- “Sopharmacy 61” EOOD - retail trade in medicinal products;
- “Sopharmacy 62” EOOD - retail trade in medicinal products;
- “Sopharmacy 63” EAD - retail trade in medicinal products, franchising and other services;
- PAO “Vitamini”, Ukraine – production and trade in pharmaceuticals;
- OOO “Sopharma Ukraine”, Ukraine – trade in pharmaceuticals and market and public opinion research;
- “Sopharma Trading” d.o.o. – wholesale trade in medicinal products;
- “Sopharma Poland” Z.O.O., Poland, in liquidation – market and public opinion research;
- “Sopharma Warsaw SP.” Z.O.O., Poland – wholesale trade in pharmaceutical and medicinal products and market and public opinion research;
- SIA “Briz”, Latvia – trade in pharmaceuticals;
- TOO “Sopharma Kazakhstan”, Kazakhstan – trade in pharmaceuticals;
- SOOO “Brititrade”, Belarus – trade in pharmaceuticals;
- OOO “Tabina”, Belarus – trade in pharmaceuticals;
- OOO “Farmacevt Plus”, Belarus – trade in pharmaceuticals;
- OOO “Galenapharm”, Belarus – retail trade in medicinal products, medical equipment and pharmaceuticals;
- ODO “Medjel”, Belarus – retail trade in medicinal products, medical equipment and pharmaceuticals;
- ODO “Alenpharm-plus”, Belarus – retail trade in medicinal products, medical equipment and pharmaceuticals;
- ODO “SalusLine”, Belarus – retail trade in pharmaceuticals and medical equipment.
- ZAO “Interpharm”, Belarus – trade in pharmaceuticals and food supplements;
- OOO “Zdorovei”, Belarus – trade in pharmaceuticals;

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- BOOO “SpetsAfarmatsia” - trade in pharmaceuticals and food supplements;
- OOO “Bellerofon” – retail trade in medicinal products, medical equipment and food supplements;
- UAB “Recessus”, Lithuania – trade and marketing of medical goods and food supplements;
- OOO “Zdorovei Pharm”, Belarus – consultancy;
- “Pharmachim” EOOD, Serbia – consultancy;
- SIA “Briz Trading”, Latvia - trade in pharmaceuticals.

OTHER LONG-TERM EQUITY INVESTMENTS

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

	<i>Country</i>	<i>31.03.2021</i>	<i>Interest</i>	<i>31.12.2020</i>	<i>Interest</i>
		<i>BGN '000</i>	<i>%</i>	<i>BGN '000</i>	<i>%</i>
Traded securities					
“Lavena” AD	Bulgaria	4,876	12.82	5,024	12.84
“Sopharma Properties” REIT	Bulgaria	6,042	4.81	4,648	3.78
“Olainfarm” AD	Latvia	1,521	0.77	1,533	0.77
“Chimimport” AD	Bulgaria	303	0.14	310	0.14
“Achieve Life Sciences” Inc.	USA	35	0.03	23	0.03
BTF “Expat Bulgaria”	Bulgaria	4	0.01	3	0.01
Other		3	-	5	-
		12,784		11,546	
Non-traded securities					
OOO “Fitobel”	Belarus	1,419	19.00	1,381	19
ODO “Ne Ska”	Belarus	811	19.00	790	19
OOO “Farmico”	Belarus	172	2.00	172	2.00
ODO “DKM-Pharm”	Belarus	100	2.00	100	2.00
OOO “Set Aptek”	Belarus	70	2	70	2.00
“Balkanpharma-Razgrad” AD	Bulgaria	70	-	70	-
Imvenchar I KDA	Bulgaria	50	1.36	50	1.36
OOO “Aptekar-Center”	Belarus	24	0.00	24	0.00
Others		74	-	91	-
		2,790		2,748	
Total		15,574		14,294	

As at 31 March 2021, within “others” are stated long-term equity investments at the amount of 77 thousand (31 December 2020: BGN 96 thousand) in Group’s non-controlling interest in a total of seven companies (31 December 2020: eight companies).

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The fair value per share at 31 March 2021 and 31 December 2020 by companies is as follows:

	<i>Number of shares</i>	<i>Fair value per share</i>	<i>31.03.21 BGN '000</i>	<i>Number of shar es held</i>	<i>Fair value per share</i>	<i>31.12.2020 BGN '000</i>
Equity investments						
“Lavena” AD	1,272,090	3.83	4,876	1,273,66	3.94	5,024
“Sopharma Imoti” REIT	1,055,728	5.72	6,042	829,822	5.60	4,648
“Olainfarm” AD	108,500	14.13	1,521	108,500	14.13	1,533
“Chimimport” AD	329,000	0.92	303	329,000	0.94	310
“Achieve Life Sciences” Inc.	1,796	12.91	35	1,796	12.91	23
BTF “Expat Bulgaria”	4,565	0.82	4	4,565	0.72	3
“Aroma” AD	2,371	1.10	2	2,371	1.84	4
“Industrial Holding Bulgaria” AD	1,482	0.82	1	1,482	0.83	1
Total			12,784			11,546

The table below presents the Group's other long-term equity investments at fair value levels in the interim consolidated statement of financial position:

<i>Equity investments</i>	<i>Fair value</i>	<i>(Level 1)</i>	<i>(Level 2)</i>
	<i>31.03.2021</i>		
	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>
“Sopharma Imoti” REIT	6,042	6,042	-
“Lavena” AD	4,876	-	4,876
“Olainfarm” AD	1,521	1,521	-
“Chimimport” AD	303	303	-
“Achieve Life Sciences” Inc.	35	35	-
“Aroma” AD	2	-	2
BTF “Expat Bulgaria”	4	4	-
“Industrial Holding Bulgaria” AD	1	1	-
Total	12,784	7,906	4,878

<i>Equity investments</i>	<i>Fair value</i>	<i>(Level 1)</i>	<i>(Level 2)</i>
	<i>31.12.2020</i>		
	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>
“Lavena” AD	5,024	-	5,024
“Sopharma Imoti” REIT	4,648	4,648	-
“Olainfarm” AD	1,533	1,533	-

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“Chimimport” AD	310	310	-
“Achieve Life Sciences” Inc.	23	23	-
“Aroma” AD	4	-	4
BTF “Expat Bulgaria”	3	3	-
“Industrial Holding Bulgaria” AD	1	1	-
Total	11,546	6,518	5,028

The table below shows the movement between the opening and closing balances of the fair values at Level 1 and Level 2:

	<i>Level 1</i> <i>BGN'000</i>	<i>Level 2</i> <i>BGN'000</i>	<i>Total</i> <i>BGN'000</i>
Balance at 1 January 2020	4,575	4,985	9,560
Purchases	2,620	88	2,708
Sales	(15)	(44)	(59)
Deregistration of capital	(26)	-	(26)
Unrealized gain/(loss), net, included in other comprehensive income (Note 13)	(636)	(1)	(637)
Balance at 31 December 2020	6,518	5,028	11,546
Purchases	1,302	-	1,302
Sales	-	(7)	(7)
Unrealized gain/(loss) included in other comprehensive income (Note 13)	86	(143)	(57)
Balance at 31 March 2021	7,906	4,878	12,784

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 consolidated financial statements for 2021.

/Signature/

Ognian Donev
Executive director

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