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1. BACKGROUND CORPORATE INFORMATION

“Sopharma” AD is a business entity registered in Bulgaria with a seat and registered address of management: Sofia, 16, Iliensko Shose Str. The Company was entered in the Commercial Registry on 11 April 2008 with UIC 831902088.

The Company was registered with court on 15 November 1991 by Decision № 1/1991 of Sofia City Court.

1.1. Ownership and management

“Sopharma” AD is a public company under the Law on Public Offering of Securities.

As at 31 March 2022, the structure of Company's joint-stock capital was as follows:

	%
“Donev Investments Holding” AD	27.86
“Telecomplect Invest” AD	20.68
CUPF “Alianz Bulgaria”	5.23
“Sopharma” AD (treasury shares)	9.69
Other legal persons	26.23
Physical persons	10.31

“Sopharma” AD has a one-tier management system with a five-member Board of Directors. Company's management in the form of Board of Directors is composed as at 31 March 2022 as follows:

Ognian Donev, PhD	Chairperson
Vessela Stoeva	Member
Bissera Lazarova	Member
Alexander Tchaoushev	Member
Ivan Badinski	Member

The Company is represented and managed by its Executive Director - Ognian Donev, PhD.

The Audit Committee supports the work of the Board of Directors and plays the role of those charged with governance that exercise monitoring and control over the internal control system, risk management and Company's system of financial reporting.

The composition of the Audit Committee is as follows:

Vasil Naidenov	Chairperson
Tsvetanka Zlateva	Member
Kristina Atanasova - Elliot	Member

Based on a contract for commercial management concluded on 9 June 2020, the Company's procurator is Simeon Donev.

The average number of Company's personnel for 2022 is 1,740 workers and employees (2021: 1,860).

1.2. Principal activities

The principal activities of the Company include the following types of transactions and deals:

- production and trade in medicinal substances and finished drug forms;
- research and development as well as engineering and implementation activities in the field of medicinal products.

The Company holds manufacturing / import authorisation for medicinal products which was last updated with № BG / MIA - 0293 dated 19 January 2022, issued by the Bulgarian Drug Agency (BDA).

2. SUMMARY OF THE SIGNIFICANT ACCOUNTING POLICIES OF THE COMPANY

2.1. Basis for preparation of the separate financial statements

The separate financial statements of SOPHARMA AD have been prepared in accordance with all International Financial Reporting Standards (IFRS), which comprise Financial Reporting Standards and the International Financial Reporting Interpretations Committee (IFRIC) interpretations, approved by the International Accounting Standards Board (IASB), as well as the International Accounting Standards (IAS) and the Standing Interpretations Committee (SIC) interpretations, approved by the International Accounting Standards Committee (IASC), which are effectively in force on 1 January 2022 and have been accepted by the Commission of the European Union. IFRSs as adopted by the EU is the commonly accepted name of the general-purpose framework – the basis of accounting equivalent to the framework definition introduced by § 1, p. 8 of the Additional Provisions of the Accountancy Act "International Accounting Standards" (IASs).

For the current financial year the Company has adopted all new and/or revised standards and interpretations, issued by the International Accounting Standards Board (IASB) and respectively, by the International Financial Reporting Interpretations Committee (IFRIC), which have been relevant to its activities.

The adoption of these standards and/or interpretations, effective for annual periods commencing on 1 January 2022, has not resulted in changes to the Company's accounting policy, with the exception of some new and the expansion of already introduced disclosures, without leading to other changes in the classification or measurement of individual reporting items and transactions.

The new and/or amended standards and interpretations include:

- *Amendments to IFRS 3 “Business Combinations” (in force for annual periods beginning on or after 1 January 2022, not endorsed by EC).* These amendments update IFRS 3 by replacing an outdated reference to the Conceptual Framework for Financial Reporting with its latest updated 2018 version. They also add an exception from the principle for recognition of liabilities and contingent liabilities within the scope of IAS 37 “Provisions, Contingent Liabilities and Contingent Assets” and IFRIC 21 “Levies”, explicitly specifying

that contingent liabilities are not recognized at the date of acquisition. The amendments are applied prospectively.

- *Amendments to IAS 16 “Property, Plant and Equipment” (in force for annual periods beginning on or after 1 January 2022, not endorsed by EC).* These amendments prohibit deducting from the cost for “testing whether the asset is functioning properly”, which is part of the direct costs attributable to bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management, net proceeds received from selling items produced while the entity is preparing the asset for its intended location and condition. Instead, the entity shall recognize this sales revenue for such items and the respective costs related thereto within profit or loss for the period, in accordance with the other applicable standards. The amendments specify that testing whether the asset is functioning properly is in fact an assessment of whether the technical and physical performance and capacity of the asset correspond to its intended use in production, supply of goods or services, lease, or for administrative purposes. Additionally, the amendment requires entities to separately disclose the amounts of proceeds and costs relating to items produced that are not an output of the entity’s ordinary activities. The amendments are applied retrospectively, but only for property, plant and equipment brought to the location and condition necessary for their intended use on or after the start of the earliest period presented in the financial statements for which the entity first applies the amendments.
- *Amendments to IAS 37 “Provisions, Contingent Liabilities and Contingent Assets” (in force for annual periods beginning on or after 1 January 2022, not endorsed by EC).* The amendments specify that the ‘cost of fulfilling’ a contract comprises the ‘costs that relate directly to the contract’, including: a) direct labour costs and direct cost of materials; and b) additional costs which related directly to fulfilling the contract – for instance, the allocation of the depreciation charge for an item of property, plant and equipment used in fulfilling the contract. Administrative and other general costs are excluded, unless specifically billable to the counterpart. The amendments also make a small adjustment to the clarifications for recognition of impairment losses before a separate onerous contract provision is created, by highlighting that these are assets used in fulfilling the contract rather than assets dedicated thereto, which was the requirement prior to the amendments’ enforcement. An entity shall apply those amendments to contracts for which it has not yet fulfilled all its obligations at the beginning of the annual reporting period in which it first applies the amendments.
- *Annual Improvements to IFRSs 2018-2020 Cycle, to IFRS 1 “First-time Adoption of International Financial Reporting Standards”, IFRS 9 “Financial Instruments”, Illustrative Example 13 to IFRS 16 “Leases” and IAS 41 “Agriculture” (in force for annual periods beginning on or after 1 January 2022, not endorsed by EC).* These improvements

introduce partial amendments to the following standards: a) the amendment to IFRS 1 grants a relief for a subsidiary in first-time adoption of IFRS at a date later than the parent. It measures in its separate financial statements the assets and liabilities at the carrying amounts that would be included in the parent’s consolidated financial statements based on which the parent acquired the subsidiary. The subsidiary may, in its financial statements, measure the cumulative translation differences using the carrying amount stated in the parent’s consolidated financial statements based on the date of the parent’s date of transition to IFRS, unless adjustments have been made for the purpose of consolidation procedures or to account for the business combination’s effects. This amendments will also be applied for associates and joint ventures which have elected the same relief under IFRS 1. Entities shall apply this amendments for annual reporting periods beginning on or after 1 January 2022. Earlier application is permitted; b) the amendment to IFRS 9 clarifies which fees an entity includes when it applies the ‘10 per cent’ test in assessing whether in case of a modification of a financial liability the conditions of the new or amended financial liability significantly differ from the conditions of the initially recognized one. According to the amendment, the entity includes only fees paid or received between the entity (the borrower) and the lender, including fees paid or received by either the entity or the lender on the other’s behalf. The entity applies the amendments to financial liabilities modified at or after the beginning of the annual reporting period in which it first applies these amendments; c) the amendment to Illustrative Example 13 to IFRS 16 removes from the example the illustration of the reimbursement of leasehold improvements by the lessor in order to resolve any potential confusion regarding the treatment of lease incentives. Since the amendment refers to an illustrative example accompanying the standard and is not a part thereof, no enforcement date is specified; d) the amendment to IAS 41 removes the requirement for entities to exclude taxation cash flows when measuring the fair value of biological assets and agricultural production.

At the date of this financial statement were issued but not in force (and/or not adopted by the EC) and the following amended standards and interpretations:

- *Amendments to IAS 1 “Presentation of Financial Statements” and Practice Statement 2 (effective for annual periods beginning on or after 1 January 2023, not endorsed by EC).* The changes: (a) require disclosure of material information about accounting policies instead of significant accounting policies. (b) explain how entities can identify material information about accounting policies and give examples of when information about

accounting policies is likely to be material; (c) clarify that information about accounting policies may be material because of its nature, even when the amounts concerned are immaterial; (d) clarify that information about accounting policies is material if it is necessary for users of the entity's financial statements to understand other material information in the financial statements; and (e) clarify that if the entity discloses non-material information about accounting policies, this should not lead to concealment of material information about accounting policies. Earlier application is allowed. Management is in the process of researching, analysing and evaluating the effects of changes that would affect the accounting policy and the values and classification of the company's assets, liabilities, operations and results.

- *Amendments to IAS 1 Presentation of Financial Statements (effective for annual periods beginning on or after 1 January 2023, not endorsed by the EC).* These changes are aimed at the criteria for classifying liabilities as current and non-current. According to them, the enterprise classifies its liabilities as current or non-current depending on the rights that exist at the end of the reporting period and is not affected by the probability that it will exercise its right to defer settlement of liabilities. The amendments specify that "settlement" of liabilities means the transfer to a third party of cash, equity instruments, other assets or services. The classification does not apply to derivatives in convertible liabilities, which are themselves equity instruments. The changes are applied retrospectively. Management is in the process of researching, analysing and evaluating the effects of changes that would affect the accounting policy and the values and classification of the company's assets, liabilities, operations and results.
- *Amendments to IAS 8 "Accounting Policies, Changes in Accounting Estimates and Errors" (in force for annual periods beginning on or after 1 January 2023 – not endorsed by EC).* The changes are mainly focused on estimates and are related to: (a) the "definition of changes in estimates" has been replaced by "definition of estimates". According to the new definition, estimates are values in the financial statements that are subject to uncertainty about their valuation; (b) the entity develops estimates if the accounting policies require items in the financial statements to be measured in a manner that includes uncertainty about their measurement; (c) a clarification that a change in estimate resulting from new information or new developments does not constitute a correction of an error; and (d) a change in estimate may have an impact on profit or loss for the current period or on profit and loss for the current and future periods. Earlier application is allowed. Management is in the process of researching, analysing and evaluating the effects of changes that would

affect the accounting policy and the values and classification of the company's assets, liabilities, operations and results.

- *IAS 12 Income Taxes (effective for annual periods beginning on 1 January 2023, not endorsed by the EC).* Amendments to IAS 12 Income Taxes - Deferred Taxes on Assets and Liabilities Arising from a Single Transaction. The amendments limit the scope of the exemption from the recognition of deferred tax liabilities, as a result of which it does not apply to transactions where, on initial recognition, equal amounts of taxable and deductible temporary differences arise. Such transactions are the recognition of an asset “right of use” and lease obligations by lessees at the commencement date of the lease, as well as the accrual of liabilities for dismantling, relocation and restoration included in the cost of the asset. Upon the entry into force of the amendments, enterprises should recognize each deferred tax asset (to the extent that it is probable that taxable profit will be available against which deductible temporary differences can be used) and deferred tax liabilities (for all taxable temporary differences) in accordance with the criteria in IAS 12 for transactions in assets and liabilities arising from single transactions on or after the beginning of the earliest comparative period presented in the financial statements. Undertakings recognize the cumulative effect of the initial application of the amendments as an adjustment to the opening balance of retained earnings or other component of equity, if appropriate at that date. The amendments are effective for annual periods beginning on or after 1 January 2023, with earlier application permitted. Management is in the process of researching, analysing and evaluating the effects of changes that would affect the accounting policy and the values and classification of the company's assets, liabilities, operations and results.
- *IFRS 10 (amended) “Consolidated Financial Statements” and IAS 28 (amended) “Investments in Associates and Joint Ventures” – regarding the sale or contribution of assets between an investor and its associates or joint ventures (postponed effective date, to be determined by the IASB).* These amendments address the accounting treatment of the sale or contribution of assets between an investor and its associates or joint ventures. They confirm that the accounting treatment depends on whether the assets sold or contributed constitute in substance a business as defined in IFRS 3. If these assets as an aggregate do not meet the definition of a business, then the investor shall recognise gain or loss only to the extent of other unrelated investor's interests in the associate or joint venture. In cases of sale or contribution of assets, which as an aggregate constitute a business, the investor shall recognise the full gain or loss on the transaction. The amendments will be applied on a prospective basis. IABS postponed the initial date of application of these amendments for an indefinite period. Management is in the process of

researching, analysing and evaluating the effects of changes that would affect the accounting policy and the values and classification of the company's assets, liabilities, operations and results.

The individual financial statements of the Company have been prepared on a historical cost basis except for property, plant and equipment, investment property and financial assets constituting equity investments through other comprehensive income, which are measured at revalued amount and respectively, at fair value.

The Company keeps its accounting books in Bulgarian Levs (BGN), which is accepted as being its presentation currency. The data in the separate financial statements and the notes thereto is presented in thousand Bulgarian Levs (BGN'000) except where it is explicitly stated otherwise.

The presentation of financial statements in accordance with International Financial Reporting Standards requires the management to make best estimates, accruals and reasonable assumptions that affect the reported values of assets and liabilities, the amounts of income and expenses and the disclosure of contingent receivables and payables as at the date of the financial statements. These estimates, accruals and assumptions are based on the information, which is available at the date of the financial statements, and therefore, the future actual results might be different from them (whereas in the conditions of financial crisis the uncertainties are more significant). The items presuming a higher level of subjective assessment or complexity or where the assumptions and accounting estimates are material for the individual financial statements, are disclosed in *Note 2.32, Note 12, Note 14 and Note 17*.

2.2. Consolidated financial statements of the Company

The Company has started the process of preparation of its consolidated financial statements for the first quarter of 2022 in accordance with IFRS effective for year 2022 whereas the individual financial statements will be included therein. In accordance with the planned dates, the management expects the consolidated financial statements to be issue no later than 30 May 2022 after which date the report will be publicly available to third parties.

2.3. Comparatives

The Company usually presents comparative information for one prior year in its financial statements.

Where necessary, comparative data is reclassified (and restated) in order to achieve comparability in view of the current year presentation changes.

2.4. Functional currency and recognition of exchange differences

The functional and reporting (presentation) currency of the Company is the Bulgarian Lev. Starting from 1 July 1997 the Bulgarian Lev was fixed under the Bulgarian National Bank Act to the German Mark at the ratio of BGN 1 : DEM 1, and with the introduction of the Euro as the official currency of the European Union, it has been fixed to the Euro at a ratio of BGN 1.95583 : EUR 1.

Upon its initial recognition, a foreign currency transaction is recorded in the functional currency whereas the exchange rate to BGN at the date of the transaction or operation is applied to the foreign currency amount. Cash and cash equivalents, receivables and payables, as monetary reporting items, denominated in a foreign currency, are recorded in the functional currency by applying the exchange rate as quoted by the Bulgarian National Bank (BNB) for the last working day of the respective month. At 31 December, these amounts are presented in BGN at the closing exchange rate of BNB.

The non-monetary items in the statement of financial position, which have been initially denominated in a foreign currency, are accounted for in the functional currency by applying the historical exchange rate at the transaction date and are not subsequently revalued at the closing exchange rate.

Foreign exchange gains or losses arising on the settlement or recording of foreign currency transactions at rates different from those at which they were converted on initial recognition, are recognised in the statement of comprehensive income (within profit or loss for the year) in the period in which they arise and are treated as 'other operating income/(losses)' (within profit or loss for the year) and presented net.

2.5. Revenue

Revenue from contracts with customers

The Company's usual revenue is from the activities disclosed in *Note 3.1.*

2.5.1. Recognition of revenue from contracts with customers

The Company's revenue is recognised when control over the goods promised in the *contract with the customer* is transferred to the customer. Control is transferred to the customer upon satisfaction of the contractual performance obligations through transfer of the promised goods and/or provision of the promised services.

Measurement of contracts with customers

The Company accounts for *a contract with a customer* only if upon its enforcement: a/ it has commercial essence and rationale; b/ the parties to the contract have approved the contract (in writing, orally or in accordance with other customary business practices) and are committed to perform it; c/ each party's rights and the d/ payment conditions can be identified; and e/ it is probable that the Company will collect the consideration to which it is entitled upon performing its performance obligations. In evaluating whether collectability of an amount of consideration is probable, the Company considers all relevant facts and circumstances of the transaction, including past experience, customary business practices, published rules and declarations made by the Company, collaterals and possibilities for satisfaction.

A contract for which any of the above criteria has not yet been met is subject to new assessment in each reporting period. The consideration received under such contracts shall be recognised as payable (*contract liability*) in the statement of financial position, until: a) all criteria for recognizing a contract with a customer are met; b) the Company meets its performance obligations and has received the whole or almost

the whole remuneration (which is not recoverable); and/or c) when the contract is terminated and the remuneration received is not recoverable.

Upon the initial measurement of its contracts with customers, the Company makes additional analysis and judgement whether two or more contracts should be combined and accounted for as a single contract, respectively whether the products promised in each separate and/or combined contract should be accounted for as a single and/or multiple performance obligation(s).

Each promise to transfer goods which are distinct (in nature and in the context of the contract), is accounted for as a separate performance obligation.

The Company recognises revenue for *each separate performance obligation* at the level of *individual contracts with customers*, by analysing the type, term and conditions of each particular contract. For contracts with similar features, revenue is recognised on a portfolio basis, only if their grouping into a portfolio would not have a materially different impact on the financial statements.

When another (third) party is involved in the performance of obligations, the Company determines whether it acts in its capacity as principal or agent, by assessing the nature of its promise to the customer: to provide the finished goods or services on its own (principal) or to arrange for another party to provide them (agent). The Company is a principal and recognises as revenue the gross amount of remuneration if it controls the promised finished goods and/or services prior to their transfer to the customers. If however the Company does not obtain control over the promised goods and/or services and its obligation is only to organise for a third party to provide these finished goods and/or services, the Company is an agent and recognises as revenue the net amount it retains for the services granted in its capacity as agent.

2.5.2. Measurement of revenue under contracts with customers

Revenue is measured based on the *transaction price* determined for each contract.

The transaction price is the amount of consideration to which an entity expects to be entitled, excluding amounts collected on behalf of third parties. Upon determining the transaction price, the Company takes into consideration the contractual conditions and its customary business practices, including the impact of variable consideration, the existence of a significant financing component in the contract, non-cash consideration, consideration payable to the customer (if any). In contracts with more than one performance obligations, the transaction price is allocated between each performance obligation based on the standalone selling prices of each good and/or service determined based on one of the methods permitted under IFRS 15, priority being given to the method of “observable selling prices”.

The change in the scope or price (or both) of the contract is accounted for as a separate contract and/or as part of the existing contract, depending on whether the change is related to the addition of goods and/or services which are distinct, and on the price determined for them. Depending on that: a) the Company accounts for a contract modification as a separate contract if the scope of the contract increases because of the addition of promised goods or services that are distinct, and the price of the contract increases by an amount of consideration that reflects the entity's stand-alone selling prices of the additional promised goods or services; b) the Company accounts for the contract modification as if it were a termination of the existing contract and the creation of a new contract (future application), if the remaining goods and/or services are distinct from the goods and/or services transferred before the contract modification, but the change in the

contract price does not reflect the standalone selling price of the goods and/or services added; c) the Company accounts for the contract modification as if it were a part of the existing contract (cumulative adjustment) if the remaining goods or services are not distinct and, therefore, form part of a single performance obligation that is partially satisfied.

2.5.3. Performance obligations under contracts with customers

Revenue from the sale of products

Wholesales of medical substances and medical forms are made in the country and abroad, both based on the Company’s specification (technology) and based on the customer’s specification (technology). As a whole, the Company has concluded that it acts as principal in its contracts with customers, unless it has been explicitly stated otherwise for certain transactions, since usually the Company controls its goods and/or services prior to their transfer to the customer.

Sales of products based on the Company’s specifications

Upon sales of products based on the Company’s specifications, control is transferred to the customer *at a point in time*.

Upon *domestic sales*, this is usually upon handover of the products and the physical ownership of the customer thereof, when the customer may dispose of the finished goods by obtaining substantially all remaining rewards.

Upon *export sales*, the judgement on the point in which the customer obtains control over the finished goods is made based on the INCOTERMS applicable for the contract.

Sales of products based on the customer’s specifications

Regarding products produced based on the customer’s specifications, the Company has a legal and contractual restriction on direction for other use (sales to another party) and it has no alternative use. In these cases, the method of transfer is determined specifically for each contract with customers (at individual contract level). For this purpose, it is determined if the Company is entitled to payment for the work performed to date, which should at least compensate for the cost incurred, plus a reasonable margin should the contract be terminated for reasons other than the Company’s default (legally exercisable right to payment).

If in the specific contract the Company has a legally exercisable right to payment, revenue is recognised *over time*, and the *output method* is used to measure progress (stage of completion) of the contract. This method has been determined as most suitable to measure progress, as the results achieved best describe the Company’s activity towards complete satisfaction of the performance obligations. Progress is measured *based on the units produced versus the total number of units ordered by the customer*. The assessments of revenue, costs and/or stage of progress towards complete satisfaction of the performance obligations are reviewed at the end of each reporting period, incl. in case of change in the circumstance/occurrence of new circumstances. Each subsequent increase or decrease of expected revenue and/or costs is stated within profit or loss for the period in which the circumstances resulted in the review became known to the management.

If in the specific contract the *Company does not have a legally exercisable right to payment*, revenue is recognised revenue is recognised *at a point in time*, when control over the products sold is transferred to

the customer: when the products are handed over to the customer and it has physical title thereon (for domestic sales) and in accordance with the contract’s applicable INCOTERMS (for export sales).

Transportation of the products sold

Usually, upon export sales, the Company is responsible for transporting the goods to the location agreed, and transport is organised by the Company, and the cost of transport is included (calculated) as part of the selling price. Depending on the transportation conditions agreed with the customer, it may be carried out also after control over the products sold has been transferred to the customer. Until the transfer of control over the products, the sales of products and the transportation service are accounted for as a *single performance obligation*, since they constitute parts of an integrated service.

The transportation service following transfer of control over the products sold is accounted for as a *separate performance obligation*, since the transportation can be provided by another supplier (i.e. the customer may use the products sold with easily accessible resources), and the transportation service does not modify or amend the products sold in any way. In this case, the remuneration the Company expects to be entitled to (the transaction price) is allocated between the separate performance obligations based on their standalone selling prices. The standalone selling price of the products sold is determined based on the price list effective at the transaction’s date, and the standalone selling price of the transport service is determined in an approximate manner by using the cost plus margin approach.

To render the transportation service, the Company uses transportation companies – subcontractors. The Company has determined it controls the services prior to their provision to the customer and therefore it acts in its capacity as principal, since a) it bears the responsibility for rendering the services and that the services are acceptable to the customer (i.e. the Company is responsible for fulfilling the promise in the contract irrespective of whether it performs the services itself or hires a third-party service supplier to perform them); and b) it negotiates the service price independently, without interference by the customer.

Revenue from the sales of transportation services are recognised *over time*, since it is not necessary for the work performed to date to be repeated if another party has to perform the remaining work, therefore, the customer receives and consumes rewards simultaneously with the service rendition. In order to measure the contract progress (stage of completion), the *input method* is used. This method has been determined as most appropriate to measure progress since it best describes the Company’s activity regarding the transfer of control and satisfaction of obligations; respectively, it most accurately reflects the level of performance of obligations, in as far as the Company’s efforts (costs incurred) are directly related to the transfer of the service to the customer. Progress is measured *based on the costs incurred versus the total costs planned for contract performance*.

Transaction price and payment terms

Selling prices are fixed based on a common or customer-specific price list and are individually determined for each product. The usual credit period is 30 to 270 days. In certain cases, the Company collects short-term advances from clients which do not have a significant financing component. The advances from clients are presented in the statement of financial position as contract liabilities.

Variable consideration

The variable consideration is included in the transaction price only to the extent that it is highly probable that a significant reversal in the amount of cumulative revenue recognised will not occur. The forms of variable consideration include:

- Volume discounts: Retrospective trade discounts provided to the customer upon reaching monthly, quarterly and/or annual turnover determined in advance, set as a uniform threshold and/or progressive bonus scheme. Upon measuring the variable consideration, the Company determines the customer’s estimated turnover by using the most probable value method. The discounts granted are offset against the amounts due by the customer.
- Price protection: With regards to domestic sales, the Company is obliged, upon price reduction imposed by a state regulatory body, to compensate the buyer and/or its customers for finished goods purchased at a higher price and not yet sold to end clients. The payment of this consideration depends on the state policy on medicinal products price regulation and is beyond the Company’s control.
- Compensation for hidden flaws: the customer may claim returns due to hidden flaws (quality claims) throughout the validity period of the finished goods sold, which may vary from one to five years. Quality claims are settled by the provision of new compliant goods or by recovery of the amount paid by the customer. Upon determining the compensations for hidden flaws due at the end of the reporting period, the Company takes into consideration the quality assurance system implemented thereby and the accumulated experience.
- Compensations due to the customer: in case of inaccurate performance of contractual obligations by the Company, usually in relation of failure to meet the negotiated delivery deadline. These are included within a decrease of the transaction price only if the payment is very likely. The Company’s experience shows that historically, contract terms are complied with, and the Company has not charged payables for payment of compensations.
- Compensations owed by the customer: variable consideration in the form of compensations for delayed payment by the customer. Receiving such consideration depends on the customer’s actions and is beyond the Company’s control. They are included within the transaction price only when the uncertainty regarding their receipt has been resolved.

Including compensations (owed by and due to the customer) within the transaction price is determined for each individual contract and is subject to review at the end of each reporting period.

The variable consideration expected in the form of various discounts, defaults and compensations is determined and measured based on the accumulated historical trade experience with customers and is recognised as adjustment for the purpose of the transaction price only and respectively the revenue (as an “increase” or a “decrease” component) only to the extent that it is highly probable that a significant reversal in the amount of cumulative revenue recognised will not occur, including due to assessment restrictions. Any subsequent changes to amount of the variable consideration are recognised as adjustment of revenue (as an increase or a decrease) at the date of change and/or resolving the uncertainty. At the end of each reporting period, the Company updates the transaction prices, including whether the estimated price contains restrictions, so as to accurately present circumstances existing and occurring during the reporting period. Upon assessing the variable consideration, the Company uses the most likely value approach.

Discounts accrued but not settled at the end of the reporting period, to which the customer still does not have unconditional right, are presented as refund obligations in the statement of financial position.

2.5.4. Contract costs

The Company treats as contract costs the following:

- the additional and directly related expenses it incurs upon concluding a contract with a customer, which it expects to recover over a period longer than twelve months (*costs to obtain a contract with a customer*) and
- the expenses it incurs to fulfil a contract with a customer and which are directly related to the specific contract, support the generation of resource to be used in the contract fulfilment and the Company expects to recover them over a period longer than twelve months (*costs to fulfil such contracts*).

In its usual activity, the Company does not incur direct and specific costs to enter contracts with customers or costs to fulfil contracts with customers which would not have occurred if the respective contracts had not been concluded.

2.5.5. Contract balances

Trade receivables and contract assets

A contract asset is the Company's right to consideration in exchange for goods or services that it has transferred to a customer but is not unconditional (receivable accrual). If by transferring the products and/or providing the services the Company performs its obligation to the customer to pay the respective consideration and/or before the payment is due, a contract asset is recognised for the consideration worked-out (which is conditional). Recognised contract assets are reclassified as trade receivables when the right to consideration becomes unconditional. A right to consideration is unconditional if only the passage of time is required before payment of that consideration is due.

Contract liabilities

A contract liability is the consideration received from the customer and/or the unconditional right to receive consideration before it has performed its contractual obligations. Contract liabilities are recognised as revenue when (or as) the performance obligations are satisfied.

Contract assets and contract liabilities are stated within other receivables and payables in the statement of financial position. They are included within current assets when their maturity is within 12 months or are part of the Company's usual operating cycle, and the others are stated as non-current. Assets and liabilities from a single contract are stated net in the statement of financial position, even if they result from difference performance obligations in the contract.

Following their initial recognition, trade receivables and contract assets are subject to review for impairment pursuant to the conditions of IFRS 9 *Financial Instruments*.

2.5.6. Refund obligations under contracts with customers

The refund obligation includes the Company’s obligation to reimburse a portion or the whole consideration received (or subject to receipt) from the customer under contracts with a right of return – for the expected retrospective discounts, rebates and discount volumes. The obligation is initially measured at the amount which the Company does not expect to be entitled to and which it expects to return to the customer. At the end of each reporting period, the Company updates the measurement of the refund obligations, respectively of the transaction price and of the recognised revenue.

Refund obligations under contracts with customers are stated within “other current liabilities” in the statement of financial position.

Other revenue

Other revenues include the realized revenues from provided investment properties and tangible fixed assets under operating lease. They are presented in the statement of comprehensive income (in profit or loss for the year) to the item / item "income".

2.6. Expenses

Company’s expenses are recognised upon incurrence and based on the accrual and comparability principles to the extent at which this would not result in the recognition of assets/liabilities that do not meet the definitions for such under IFRS.

Deferred expenses are postponed for recognition as deferred expense in the period that contracts related thereto are performed.

Losses from the revaluation of investment property to fair value are stated in the statement of comprehensive income (within profit or loss for the year), within “other operating income/(losses)”.

Losses from revaluation of agricultural produce upon initial fair value measurement are stated in the statement of comprehensive income (within profit or loss for the year), within “other operating income/(losses)”.

2.7. Financial income

Financial income is included in the statement of comprehensive income (within profit or loss for the year) when earned, and comprises: interest revenue from loans granted and term deposits, interest revenue from receivables under special contracts dividends on equity investments, net giants from exchange differences under loans denominated in a foreign currency, revenue from debt settlement transactions, gains from fair value measurements of investments in securities at fair value through profit or loss, or through other comprehensive income, gains from the fair value of long-term equity investments which constitute part of stage-by-stage acquisition of a subsidiary.

Interest income is calculated by applying the effective interest rate on the gross carrying amount of financial assets, with the exception of financial assets, which are credit-impaired (Stage 3), for which interest income is calculated by applying the effective interest rate on their amortised cost (i.e. the gross carrying amount after deducting the impairment allowance).

Financial income is stated separately from financial costs on the face of the statement of comprehensive income (within profit or loss for the year).

2.8. Financial costs

Financial income is included in the statement of comprehensive income (within profit or loss for the year) when incurred, and are stated separately from financial income and comprise: interest expenses on loans, interest expenses on leases, bank charges and guarantees, net foreign exchange loss from loans in a foreign currency, impairment of fees on guarantees provided, provisions under financial guarantee contracts and impairment of commercial loans granted.

Financial costs are stated separately from financial income on the face of the statement of comprehensive income (within profit or loss for the year).

2.9. Property, plant and equipment

Property, plant and equipment, including biological assets (carriers) are presented at revalued amount less the accumulated depreciation and impairment losses in value.

Initial acquisition

Upon their initial acquisition, non-current tangible assets are valued at acquisition cost (cost), which comprises the purchase price, including customs duties and any directly attributable costs of bringing the asset to working condition for its intended use. The directly attributable costs include the cost of site preparation, initial delivery and handling costs, installation costs, and professional fees for people involved in the project, non-refundable taxes, expenses on capitalised interest for qualifying assets, etc.

Upon acquisition of non-current tangible assets under deferred settlement terms, the purchase price is equivalent to the present value of the liability discounted on the basis of the interest level of the attracted by the Company credit resources with analogous maturity and purpose.

The Company has set a value threshold of BGN 500, below which the acquired assets, regardless of having the features of fixed assets, are treated as current expense at the time of their acquisition.

Subsequent measurement

The approach chosen by the Company for subsequent measurement of non-current tangible assets is the revaluation model under IAS 16, i.e. measurement at revalued amount less any subsequent accumulated depreciation and subsequent accumulated impairment losses.

The revaluation of property, plant and equipment is accepted to be performed by certified appraisers normally in a period of five years. Where the fair value changes materially in shorter periods, revaluation may be performed more frequently.

Subsequent costs

Repair and maintenance costs are recognised as current expenses as incurred. Subsequent costs incurred in relation to property, plant and equipment having the nature of replacement of certain components, significant parts and aggregates or improvements and restructuring, are capitalised in the carrying amount of the respective asset whereas the residual useful life is reviewed at the capitalisation date.

At the same time, the non-depreciated part of the replaced components is derecognised from the carrying amount of the assets and is recognised in the current expenses for the period of restructure.

Depreciation methods

The Company applies the straight-line depreciation method for property, plant and equipment. Depreciation of an asset begins when it is available for use. Land is not depreciated. The useful life of the groups of assets is dependent on their physical wear and tear, the characteristic features of the equipment, the future intentions for use and the expected obsolescence.

The useful life per group of assets is as follows:

- for buildings – from 20 to 70 years;
- for facilities and transmitter devices – from 5 to 30 years;
- for machinery and equipment – from 6 to 35 years;
- for computers and mobile devices – from 2 to 5 years;
- for servers and systems – from 4 to 18 years;
- for motor vehicles – from 5 to 13 years;
- for furniture and fixtures – from 3 to 13 years;
- for biological assets (carriers) – from 10 to 12 years.

The term of use of right-of-use assets is as follows:

- for land – from 4 to 5 years;
- for buildings – from 2 to 8 years;
- for motor vehicles – from 2 to 5 years;
- for furniture and fixtures – from 2 to 3 years.

The useful life set for any tangible fixed asset is reviewed at the end of each reporting period and in case of any material deviation from the future expectations on the period of use, the latter is adjusted prospectively.

Impairment of assets

The carrying amounts of property, plant and equipment are reviewed for impairment when events or changes in circumstances indicate that the carrying amount might permanently differ from their recoverable amount. If any indications exist that the estimated recoverable amount of an asset is lower than its carrying amount, the latter is adjusted to the recoverable amount of the asset. The recoverable amount of property, plant and equipment is the higher of fair value less costs to sell or the value in use. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market conditions and assessments of the time value of money and the risks, specific to the particular asset. Impairment losses are recognised in the statement of comprehensive income (within profit or loss for the year) unless a revaluation reserve has been set aside for the respective asset. Then the impairment is at the expense of this reserve and is presented in the statement of comprehensive income

(within other comprehensive income) unless it exceeds the reserve amount and the surplus is included as expense in the statement of comprehensive income (within profit or loss for the year).

Gains and losses on disposal (sale)

Tangible fixed assets are derecognised from the statement of financial position when they are permanently disposed of and no future economic benefits are expected therefrom or on sale, at the date of transfer of control to the asset recipient. The gains or losses arising from the sale of an item of 'property, plant and equipment' group are determined as the difference between the consideration the Company expects to be entitled to (sales revenue) and the carrying amount of the assets on the date when the recipient obtains control thereon. They are stated under 'other operating income/(losses), net' on the face of the statement of comprehensive income (within profit or loss for the year). The part of 'revaluation reserve' component attributable to the asset sold is directly transferred to 'retained earnings' component in the statement of changes in equity.

2.10. Biological assets and agricultural produce

Upon initial acquisition, biological assets (non-fruit-bearing) are valued at acquisition cost (cost), which includes the purchase price and all direct costs necessary to align the asset to a fruit-bearing condition. Direct costs are mainly: costs for land preparation and processing, costs for planting, fertilization, irrigation and other activities performed over a long period (4-5 years) in which biological assets (non-fruit-bearing) will be transferred into biological assets (bearer plants).

Agricultural produce (yellow acacia harvest) is measured at fair value as at the date of acquisition, less the sales costs. The fair value of agricultural produce is determined with the assistance of an independent licensed appraiser:

The agricultural produce –yellow acacia seeds – is presented within the Company’s inventories, on line “herbs” and is subsequently measured according to the requirements of IAS 2 *Inventories*.

Gains on losses on measurement of agricultural produce at fair value, less sales costs, are recognized in the statement of comprehensive income (within profit or loss for the year) when incurred and are stated within “other operating income/(losses), net”.

2.11. Intangible assets

Goodwill

Goodwill represents the excess of the cost of an acquisition (the consideration given) over the fair value of the share of Sopharma AD in the net identifiable assets of the subsidiaries (Bulgarian Rose - Sevtopolis AD, Medica AD and Unipharm AD) at the date of its acquisition (the business combination). This goodwill on the merger of the subsidiaries into the parent company is recognised in the separate statement of financial position of the parent. Goodwill is presented within the 'intangible assets' group.

Goodwill is measured at acquisition cost (cost), determined at the date of the actual business combination, less the accumulated impairment losses. It is not amortised. It is subject to annual review for existence of impairment indicators. Impairment losses on goodwill are presented in the separate statement of comprehensive income (within profit or loss for the year) in the item 'impairment of non-current assets'.

Other intangible assets

Intangible assets are stated in the financial statements at acquisition cost (cost) less accumulated amortisation and any impairment losses in value.

The Company applies the straight-line amortisation method for the intangible assets.

The useful life per group of assets is as follows:

- for software – from 2 to 12 years;
- for patents and licenses – from 2 to 10 years;
- for trademarks – from 5 to 13 years;
- for other intangible assets – from 5 to 7 years.

The carrying amount of the intangible assets is subject to review for impairment when events or changes in the circumstances indicate that the carrying amount might exceed their recoverable amount. Then impairment is recognised as an expense in the statement of comprehensive income (within profit or loss for the year).

Intangible assets are derecognised from the statement of financial position when they are permanently disposed of and no future economic benefits are expected therefrom or on sale, at the date of transfer of control to the asset recipient. The gains or losses arising from the sale of an item of intangible assets are determined as the difference between the consideration the Company expects to be entitled to (sales revenue) and the carrying amount of the assets on the date when the recipient obtains control thereon. They are stated under 'other operating income/(losses), net' on the face of the statement of comprehensive income (within profit or loss for the year).

2.12. Investment property

Investment property is property lastingly held by the Company to earn rentals and/or for capital appreciation. They are presented in the statement of financial position at fair value (*Note 2.31*). Gains or losses arising from a change in the fair value of investment property are recognised in the statement of comprehensive income (within profit or loss for the year) as 'other operating income/(losses), net' for the period in which they arise. Realized income from investment property is presented in the statement of comprehensive income (in profit or loss for the year) to the item "income".

Investment property is derecognised from the statement of financial position when they are permanently disposed of and no future economic benefits are expected therefrom or on sale, at the date of transfer of control to the asset recipient. Gains or losses arising from the disposal of investment property are determined as the between the consideration the Company expects to be entitled to (sales revenue) and the carrying amount of the assets on the date when the recipient obtains control thereon. They are presented under 'other operating income/(losses), net' in the statement of comprehensive income (within profit or loss for the year).

Transfers to, or from, the group of 'investment property' is made only when there is a change in the function and purpose of a particular property. In case of a transfer from 'investment property' to 'owner-occupied property', the asset is recognised in the new group at deemed cost, which is its fair value at the

date of transfer. To the opposite, in case of a transfer from 'owner-occupied property' to 'investment property' the asset is measured at fair value at the date of transfer while the difference to its carrying amount is presented as a component of the statement of comprehensive income (within other comprehensive income) and within 'revaluation reserve – property, plant and equipment' in the statement of changes in equity.

2.13. Investments in subsidiaries, associates and joint ventures

Long-term investments, in the form of stocks and shares in subsidiary, associate and joint ventures companies are presented in the financial statements at acquisition cost (cost) being the fair value of the consideration paid for the investment including any directly attributable costs incurred on the acquisition less accumulated impairment.

Company's investments in subsidiaries, associates and joint ventures are subject to annual review for impairment. Where conditions for impairment are identified, the impairment is recognised in the statement of comprehensive income (within profit or loss for the year).

In purchases and sales of investments in subsidiaries, associates and joint ventures the date of trading (conclusion of the deal) is applied.

Dividend income

Dividend income from long-term investments in the form of shares and interests in subsidiaries, associates and joint ventures is recognized as current income and presented in the statement of comprehensive income (in profit or loss for the year) to the item “financial income”.

Investments are derecognised when the rights related thereto are transferred to third parties as a result of occurrence of legal rights for that and thus the control over the economic benefits from the respective specific type of investments are being lost. Gain/(loss) on disposal is presented under the item "net profit / (loss) from sale of investments in subsidiaries, associates and joint ventures" on the face of the statement of comprehensive income (in profit or loss for the year).

2.14. Other long-term equity investments

The other long-term equity investments constitute non-derivative financial assets in the form of shares in the capital of other companies (minority interest), held for a long term.

Initial measurement

Equity investments are initially recognised at acquisition cost, which is the fair value of consideration paid, including direct costs to acquire the investment (financial asset) (*Note 2.25*).

All purchases and sales of equity instruments are recognised at the transaction's “trade date”, i.e. the date on which the Company undertakes to purchase or sell the asset.

Subsequent measurement

The equity investments held by the Company are subsequently measured at fair value (*Note 2.31*) determined with support by an independent licensed valuator.

The effects from subsequent revaluation to fair value are carried within a separate component of the statement of comprehensive income (in other comprehensive income), respectively in the reserve for financial assets at fair value through other comprehensive income.

These effects are transferred to retained earnings upon disposal of the respective investment.

Dividend income

Dividend income related to long-term equity investments constituting shares in other entities (non-controlling interest) is recognised as current income and stated in the statement of financial position (within profit or loss for the year) in the “financial income” item.

Upon derecognising shares at disposal or sale, the average weighted price method is used, applying the price determined at the end of the month when the derecognition is performed.

2.15. Inventories

Inventories are valued in the financial statements as follows:

- raw materials, materials and goods – at the lower of acquisition cost (cost) and net realisable value;
- finished goods, semi-finished goods and work in progress – at the lower of production cost and net realisable value;
- agricultural produce – at the lower of fair value at initial acquisition and net realisable value.

Expenses incurred in bringing a certain product within inventories to its present condition and location, are included in the acquisition cost (cost) as follows:

- raw materials, materials and goods – all delivery costs, including the purchase price, import customs duties and charges, transportation expenses, non-refundable taxes and other expenses, incurred for rendering the materials and goods ready for usage/sale;
- finished goods, semi-finished goods and work in progress – all necessary expenses on production that constitute the production cost, which includes the cost of direct materials and labour and the attributable proportion of production overheads (both variable and fixed), but excluding administrative expenses, exchange rate gains and losses and borrowing costs. Fixed production overheads are included in the production cost of manufactured finished goods semi-finished goods and work in progress based on the normal operating capacity determined on the grounds of commonly maintained average volume of production confirmed by the production plan. The base, chosen for their allocation at unit-of-production level, is the standard rate of man-hours of directly engaged staff in the production of the particular unit.

The Company applies 'standard production cost' for current valuation of finished goods, semi-finished goods and work in progress, and respectively, 'standard purchase cost' for basic raw materials and other production materials. At the end of each reporting period the management performs analysis of factors leading to variances on: (a) the supply of raw materials and other production materials – by comparing the actual and standard acquisition costs, and (b) the production of finished goods, semi-finished goods and work in progress – by comparing the actual and standard production costs. Where necessary, the value of inventories, included in the financial statements, is adjusted. On the basis of research on the good reporting practices in the pharmaceutical industry, the Company has adopted materiality thresholds regarding: (a) variance on supply of raw materials and other production materials – up to 2%, and (b) variance on production – up to 1%, within which the current value of the existing closing stocks of raw and other

materials, finished goods and work in progress are not adjusted for the purposes of the financial statements (*Note 2.32*).

Upon use (putting into production or sale) of inventories, they are currently expensed by applying the weighted average cost (cost) method.

The net realisable value represents the estimated selling price of an asset in the ordinary course of business less the estimated cost for completion of this asset and the estimated costs necessary to make the sale.

2.16. Trade receivables

Trade receivables constitute the Company’s unconditional entitlement to consideration under contracts with customers and other counterparties (i.e. it is only dependent on the passage of time before payment of the consideration).

Initial measurement

Trade receivables are initially recognised and carried at fair value based on the transaction price, which is usually equal to the invoice amount, unless they contain a significant financial component, which is not additionally charged. In this case they are recognised at their present amount determined at a discount equal to the interest associated to the client - debtor.

Subsequent measurement

The Company holds trade receivables only for the purpose of collecting contractual cash flows and subsequently measures them at amortised cost less the amount of impairment accumulated for credit losses. (*Note 2.25*).

Impairment

The Company applies the expected credit losses model for the entire term of all trade receivables, using the simplified approach under IFRS 9, and based on the matrix model for loss percentage (*Note 2.25 and Note 2.32*).

Impairment of receivables is accrued through the respective corresponding allowance account for each type of receivable to the “other operating expenses” on the face of the statement of comprehensive income (within profit or loss for the year).

2.17. Interest-bearing loans and other financial resources granted

All loans and other financial resources granted are initially presented at acquisition cost (nominal amount), which is accepted to be the fair value of the amount given in the transaction, net of the direct costs related to these loans and granted resources. Following their initial recognition, interest-bearing loans and other funding granted is subsequently measured and stated in the statement of financial position at amortised cost, determined by applying the effective interest method. They are classified in this group since the Company’s business model only aims to collect contractual cash flows of principal and interest. Amortised cost is calculated by taking into account all types of charges, commissions, and other costs, associated with these loans. Gains and losses are recognised in the statement of comprehensive income (within profit or

loss for the year) as financial income (interest) or costs throughout the amortisation period, or when the receivables are settled, derecognised or reduced.

Interest income is recognised in accordance with the stage in which the respective loan or other receivables has been classified based on the effective interest method.

Interest-bearing loans and other financial resources granted are classified as current ones unless (and for the relevant portion thereof) the Company has unconditionally the right to settle its payable within a term of more than 12 months after the end of the reporting period (*Note 2.25*).

2.18. Cash and cash equivalents

Cash includes cash in hand and cash in current accounts, and cash equivalents – bank deposits with original maturity up to three months, and funds in deposits with longer maturity which are readily available to the Company under its agreements with the banks over the deposits’ terms.

Subsequent measurement

Cash and cash equivalents at banks are subsequently measured at amortised cost, less the impairment accumulated for expected credit losses (*Note 2.25*).

For the purposes of the statement of cash flows:

- cash proceeds from customers and cash paid to suppliers are presented at gross amount, including value added tax (20%);
- interest on received investment purpose loans is reported as payments for financial activities while the interest on loans for current activities (for working capital) is included in the operating activities;
- interest received from bank deposits is included within cash flows from investing activities;
- VAT paid on fixed assets purchased from foreign suppliers is presented within the item 'taxes paid', while that paid on assets purchased from local suppliers is presented within the items 'purchase of PPE', 'purchase of intangible assets' and 'purchase of investment property' within cash flows from investing activities;
- overdraft proceeds and payments are stated net by the Company;
- permanently blocked funds for a period of more than 3 months are not treated as cash and cash equivalents.
- proceeds under factoring agreements are stated within cash flows from financing activities.

2.19. Trade and other payables

Trade and other current amounts payable in the statement of financial position are carried at original invoice amount (acquisition cost), which is the fair value of the consideration to be paid in the future for goods and services received. In case of payments deferred over a period exceeding the common credit terms, where no additional interest payment has been envisaged or the interest considerably differs from the

common market interest rates, the payables are initially valued at their fair value based on their present value at a discount rate applicable for the Company, and subsequently – at amortised cost (*Note 2.25*).

2.20. Interest-bearing loans and other borrowings

In the statement of financial position, all loans and other borrowings are initially presented at acquisition cost (nominal amount) which is designated as the fair value of the transaction’s deliverable, net of the direct costs related to these loans and borrowings. Following their initial recognition, interest-bearing loans and other borrowings are subsequently measured and presented in the statement of financial position at amortised cost, determined by means of the effective interest method. The amortised cost is calculated by considering all charges, commissions and other costs, including discounts and premiums associated with these loans. Gains and losses are recognised in the statement of comprehensive income (within profit or loss for the year) as financial income or financial expenses (interest) over the amortisation period or when the payables are written-off or reduced (*Note № 2.25*).

Interest costs are recognised for the term of the financial instrument based on the effective interest method.

Interest-bearing loans and other borrowings are classified as current, except from the portion thereof regarding which the Company has an unconditional right to settle its payable within over 12 months after the end of the reporting period.

2.21. Capitalisation of borrowing costs

Borrowing costs that are directly attributable to the acquisition, construction or production of a qualifying asset are capitalised as part of the cost of that asset. A qualifying asset is an asset that necessarily takes a period of at least 12 months to get ready for its intended use or sale.

The amount of borrowing costs eligible for capitalisation to the value of a qualifying asset is determined by applying a capitalisation rate. The capitalisation rate is the weighted average of the borrowing costs applicable to the borrowings of the Company that are outstanding during the period, other than borrowings made specifically for the purpose of obtaining a qualifying asset.

The capitalisation of borrowing costs as part of the cost of a qualifying asset commences when the following conditions are met: expenditures for the asset are being incurred, borrowing costs are being incurred and activities that are necessary to prepare the asset for its intended use or sale are in progress.

Borrowing costs are also reduced by any investment income earned on the temporary investment of those borrowed funds.

2.22. Leases

Lessee

A contract is, or contains, a lease, if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration.

The Company as elected to state all lease payments under short-term leases (up to 12 months) as current expenses over a straight-line basis for the lease term.

Initial recognition

The Company recognises right-of-use assets in the statement of financial position at the commencement date of the lease (the date on which a lessor makes an underlying asset available for use by the lessee).

The acquisition cost of the right-of-use asset includes:

- the amount of the initial measurement of the lease liability;
- any lease payments made at or before the commencement date, less any lease incentives received;
- any initial direct costs incurred by the lessee;
- provisions for expenses related to dismantling and removing the underlying asset.

The Company depreciates the right-of-use asset to the earlier of the end of the useful life of the right-of-use asset or the end of the lease term.

Right-of-use assets are presented in the statement of financial position, within ‘property, plant and equipment’, and depreciation thereof – in the statement of comprehensive income, within ‘depreciation and amortisation expenses’.

The lease liabilities include the net present value of the following lease payments:

- fixed lease payments less any lease incentives receivable;
- variable lease payments that depend on an index or rate;
- the exercise price of the purchase options, if the lessee is reasonably certain to exercise this option;
- payments of penalties for terminating the lease;
- residual value guarantees.

Lease payments are discounted using the interest rate implicit in the lease, if that rate can be readily determined, or the Company’s incremental borrowing rate, which it would have to pay to borrow over a similar term, and with a similar security, the funds necessary to obtain an asset of a similar value to the right-of-use asset in a similar economic environment.

Lease payments (instalments) contain a certain ratio of the financial cost (interest) and the respective portion of the lease liability (principal). Financial costs for the lease are presented in the statement of comprehensive income for the lease period on a periodic basis, so as to achieve constant periodic rate of interest on the remaining balance of the lease liability.

Subsequent measurement

The Company has elected to apply the acquisition cost model for all of its right-of-use assets. They are presented at acquisition cost less the depreciation accumulated, impairment losses and adjustments from restatement and adjustments to the lease liability.

The Company subsequently measures the lease liability by:

- increasing the carrying amount to reflect the interest on the lease liability;
- reducing the carrying amount to reflect the lease payments made;
- remeasuring the carrying amount to reflect any reassessment or lease modifications of the lease.

Accounting for revaluation and modifications to leases

As a result of revaluation, the lessee recognises the amount of revaluation of the lease liability as an adjustment to the right-of-use asset. If the carrying amount of the asset is lower, the residual amount of revaluations is recognised within profit or loss.

The Company remeasures the lease liabilities whenever:

- the modification increases the scope of the lease by adding another right-of-use of one or more additional underlying assets;
- the lease payment increases by an amount corresponding to the standalone price of the increase in the scope and potential adjustments reflecting circumstances of the respective lease.

Payments related to short-term leases and leases in which the underlying asset is of a low value, as well as variable lease payments are recognised directly as current expenses in the statement of comprehensive income on a straight-line basis over the lease term.

Lessor

Finance lease where a substantial portion of all risks and rewards incidental to the ownership of the leased asset is transferred outside the Company, is written-off from the assets of the lessor upon transfer to the asset's lessee and is presented in the statement of financial position as a receivable at an amount equal to the net investment in the lease. The net investment in the lease agreement represents the difference between the total amount of minimum lease payments under the finance lease agreement and the non-guaranteed residual value, accrued for the lessor and the non-earned financial income.

The difference between the carrying amount of the leased asset and the immediate (fair selling) value is recognised in the statement of comprehensive income (within profit or loss for the year) in the inception of the lease term (when the asset is delivered) as assets sales income.

The recognition of the earned financial income as current interest income is based on the application of the effective interest rate method.

In operating leases, the lessor continues to hold a significant part of all risks and rewards of ownership over the said asset. Therefore the asset is still included in its property, plant and equipment, while its depreciation for the period is included in the current expenses of the lessor.

Rental income from operating leases is recognised on a straight-line basis over the lease term. Initial direct costs incurred in negotiating and arranging an operating lease are added to the carrying amount of the leased asset and recognised on a straight-line basis over the lease term.

2.23. Pensions and other payables to personnel under the social security and labour legislation

The employment and social security relations with the workers and employees of the Company are based on the provisions of the Labour Code and the effective social security legislation in Bulgaria.

Short-term benefits

Short-term benefits in the form of remuneration, bonuses and social payments and benefits (due for payment within 12 months after the end of the period when the employees have rendered the service or have satisfied the required terms) are recognised as an expense in the statement of comprehensive income (within profit or loss for the year) for the period when the service thereon has been rendered and/or the requirements for their receipt have been met, unless a particular IFRS requires capitalisation thereof to the cost of an asset, and as a current liability (less any amounts already paid and deductions due) at their undiscounted amount.

At the end of each reporting period, the Company measures the estimated costs on the accumulating compensated absences, which amount is expected to be paid as a result of the unused entitlement. The measurement includes the estimated amounts of employee's remuneration and the statutory social security and health insurance contributions due by the employer thereon.

Tantieme and bonus schemes

In accordance with Company's Articles of Association and upon a decision of the General Meeting of Shareholders, the Executive Director is entitled to one-off remuneration (tantieme) at the amount of up to 1% of Company's net profit and is empowered to determine the circle of employees among whom to distribute up to 2% of Company's profit for the year as a bonus for each calendar year. When a certain portion is required to be deferred for a period of more than 12 months, this portion is measured at present value at the reporting date and is stated within non-current liabilities in the statement of financial position in the item 'payables to personnel'.

Long-term retirement benefits

Defined contribution plans

The major duty of the Company as an employer in Bulgaria is to make the mandatory social security contributions for the hired employees to the Pensions Fund, the Supplementary Mandatory Pension Security (SMPS) Fund, to the General Diseases and Maternity (GDM) Fund, the Unemployment Fund, the Labour Accident and Professional Diseases (LAPD) Fund, the Guaranteed Receivables of Workers and Employees (GRWE) Fund and for health insurance. The rates of the social security and health insurance contributions are defined annually in the Law on the Budget of State Social Security and the Law on the Budget of National Health Insurance Fund for the respective year. The contributions are split between the employer and employee in line with rules of the Social Security Code (SSC).

These pension plans applied by the Company in its capacity as an employer are defined contribution plans. Under these plans, the employer pays defined monthly contributions to the government funds as follows: Pensions Fund, GDM Fund, Unemployment Fund, LAPD Fund as well as to universal and professional pension funds – on the basis of rates fixed by law, and has no legal or constructive obligation

to pay further contributions if the funds do not hold sufficient means to pay the respective individuals the benefits they have worked-out over the period of their service. The obligations referring to health insurance are analogous.

There is no established and functioning private voluntary social security fund at the Company.

The contributions payable by the Company under defined contribution plans for social security and health insurance are recognised as a current expense in the statement of comprehensive income (within profit or loss for the year) unless a particular IFRS requires this amount to be capitalised to the cost of an asset, and as a current liability at their undiscounted amount along with the accrual of the respective employee benefits to which the contributions refer and in the period of rendering the underlying service.

Defined benefit plans

In accordance with the Labour Code, the Company in its capacity as an employer in Bulgaria is obliged to pay an indemnity to its personnel when coming of age for retirement, at an amount which, depending on the length of service with the entity, varies between two and six gross monthly salaries at the employment termination date. In their nature these are unfunded defined benefit schemes.

The calculation of the amount of these liabilities necessitates the participation of qualified actuaries in order to determine their present value at the date of the financial statements, at which they shall be presented in the statement of financial position, and respectively, the change in their value – in the statement of comprehensive income as follows: (a) current and past service costs, interest costs and the gains/losses on a curtailment and settlements are recognised immediately when incurred and are presented in current profit or loss under 'employee benefits expense'; and (b) effects from revaluation of obligations that in substance represent actuarial gains and losses are recognised immediately when occurred and are presented to other comprehensive income in the item 'revaluations of defined benefit pension plans'. Actuarial gains and losses arise from changes in the actuarial assumptions and experience adjustments.

At the end of each reporting period, the Company assigns certified actuaries who issue a report with their calculations about the long-term retirement benefit obligations to personnel. For this purpose, they apply the Projected Unit Credit Method. The present value of the defined benefit obligation is determined by discounting the estimated future cash flows, which are expected to be paid within the maturity of this obligation, and using the interest rates of long-term government bonds of similar term, quoted in Bulgaria where the Company itself operates.

Share-based payments

Share-based payments to employees and other persons rendering similar services are measured at the fair value of the equity instruments at the date of provision. For conditional share-based payments the fair value at the date of share-based payment is measured so as to reflect these conditions without actual differences between the expected and actual results.

Termination benefits

In accordance with the local provisions of the employment and social security regulations in Bulgaria, the Company as an employer is obliged, upon termination of the employment contracts prior to retirement, to pay certain types of indemnities.

The Company recognises employee benefit obligations on employment termination before the normal retirement date when it is demonstrably committed, based on a publicly announced plan, including for restructuring, to terminating the employment contract with the respective individuals without possibility of withdrawal or in case of formal issuance of documents for voluntary redundancy. Termination benefits due more than 12 months are discounted and presented in the statement of financial position at their present value.

2.24. Share capital and reserves

The Company is a joint-stock one and is obliged to register with the Commercial Register a specified ***share capital***, which should serve as a security for the creditors of the Company for execution of their receivables. Shareholders are liable for the obligations of the Company up to the amount of the capital share held by each of them and may claim returning of this share only in liquidation or bankruptcy proceedings. The Company reports its share capital at the nominal value of the shares registered in the court.

According to the requirements of the Commercial Act and the Articles of Association, the Company is obliged to set aside a ***Reserve Fund*** by using the following resources:

- at least one tenth of the profit, which should be allocated to the Fund until its amount reaches one tenth of the share capital or any larger amount as may be decided by the General Meeting of Shareholders;
- any premium received in excess of the nominal value of shares upon their issue (share premium reserve);
- other sources as provided for by a decision of the General Meeting.

The amounts in the Fund can only be used to cover annual loss or losses from previous years. When the amount of the Fund reaches the minimum value specified in the Articles of Association, the excess may be used for share capital increase.

Treasury shares are presented in the statement of financial position at cost (acquisition price) and their gross amount is deducted from Company's equity. Gains or losses on sales of treasury shares are at the account of retained earnings and are carried directly to Company's equity in the 'retained earnings' component.

Revaluation reserve – of property, plant and equipment is set aside from:

- the revaluation surplus between the carrying amount of property, plant and equipment and their fair values at the date of each revaluation; and
- gain from the difference between the carrying amount of property, stated within the group 'owner occupied property', and their fair value at the date on which they are transferred to the group 'investment property'.

Deferred tax effect on the revaluation reserve is directly carried at the account of this reserve.

Revaluation reserve is transferred to the 'accumulated profits' component when the assets are derecognised from the statement of financial position or are fully depreciated.

The revaluation reserve covers the impairment of the assets with which it relates. It may be used in the implementation of Company's dividend and capital policies only after it is transferred to the 'retained earnings' component.

The reserve for financial assets at fair value through other comprehensive income is formed by the effects of fair-value measurement of other long-term equity investments. Upon derecognition of these investments, the reserve form is transferred to 'retained earnings'.

The other capital components represent a reserve on issued warrants, which is formed by the difference between the issue value of the subscribed warrants and the transaction costs related to the issue. The warrants are issued and subscribed at a fixed price denominated in BGN and carry future rights for conversion into a fixed number of ordinary, dematerialized, registered, freely transferable shares of the company, therefore they are classified as equity instruments.

2.25. Financial instruments

A financial instrument is any contract that simultaneously gives rise to a financial asset at one entity and a financial liability or equity instrument at another entity.

Financial assets

Initial recognition, classification and measurement

Upon initial recognition, the Company's financial assets are classified in three groups, based on which they are subsequently measured: at amortised cost; at fair value through other comprehensive income, and at fair value through profit or loss.

The Company initially measures financial assets at fair value, and in the case of financial assets which are not stated at fair value through profit and loss, the direct transaction costs are added. An exception to this rule are trade receivables that do not contain a significant financing component – they are measured based on the transaction price determined under IFRS 15 (*Note 2.5.1.*).

The purchases and sales of financial assets whose conditions require asset delivery within a certain period, usually pursuant to legislation or the effective practice of the respective market (regular way purchases), are recognised using trade date accounting, i.e. on the date when the Company committed to purchase or sell the asset.

The classification of financial assets upon their initial recognition depends on the characteristics of the contractual cash flows of the respective financial asset and on the Company's business model for management thereof. In order for a financial asset to be classified and measured at amortised value or at fair value through other comprehensive income, its conditions should give rise to cash flows that are “solely

payments of principal and interest (SPPI)” on the principal amount outstanding. For this purpose, analysis is performed by means of SPPI test at instrument level.

The Company’s business model for the management of financial assets reflects the way the Company manages its financial assets to generate cash flows. The business model determines if cash flows are generated by the collection of contractual cash flows, the sale of financial assets, or both.

Subsequent measurement

For the purpose of subsequent measurement, the Company’s financial assets are classified in the following categories:

- Financial assets at amortised cost (debt instruments)
- Financial assets at fair value through other comprehensive income without “recycling” of cumulative gains or losses (equity instruments).

Classification groups

Financial assets at amortised cost (debt instruments)

The Company measures a financial asset at amortised cost if both of the following conditions are met:

- the financial asset is held within a business model whose objective is to hold financial assets in order to collect contractual cash flows and
- the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

Financial assets at amortised cost are subsequently measured using the effective interest method.

They are subject to impairment. Gains and losses are recognised in the statement of comprehensive income (within profit or loss for the year) upon asset disposal, modification or impairment.

The Company’s financial assets at amortised cost include: cash and cash equivalents at banks, trade receivables, including from related parties, loans to related and third parties (*Note 18, Note 19, Note 21, Note 22, Note 23 (a) and Note 24*).

Financial instruments at fair value through other comprehensive income (equity instruments)

Upon their initial recognition, the Company may make an irrevocable choice to classify certain equity instruments as financial instruments at fair value through other comprehensive income, but only if they meet the equity definition under IAS 32 *Financial Instruments*. The classification is determined at the level of individual instruments.

Upon derecognition of these assets, gains and losses from measurement to fair value, recognised in other comprehensive income, are not stated (recycles) through profit or loss. Dividends are recognised as “financial income” in the statement of comprehensive income (within profit or loss for the year) when the right to payment is established, with the exception of cases when the Company obtains rewards from these proceeds as compensation of a portion of the financial asset’s acquisition price – in this case, gains

are stated in other comprehensive income. Equity instruments designated as financial instruments at fair value through other comprehensive income are not subject to impairment test.

The Company has made an irrevocable commitment to classify into this category minority equity investments which it holds in the long term and in relation to its business interests in these entities. Some of these instruments are traded on stock exchanges, and some aren't. They are stated in the statement of financial position within the „other long-term equity investments” item.

Derecognition

A financial asset (or, when applicable, a portion of a financial asset or a group of similar financial assets) is derecognised from the Company's statement of financial position, when:

- the rights to cash flows from the asset have expired, or
- the rights to cash flows from the asset have been transferred or the Company has assumed an obligation to pay in full the cash flows received, without undue delay, to a third party under a transfer agreement, in which: a) the Company has transferred substantially all risks and rewards from ownership of the asset; or b) the Company has neither transferred nor retained substantially all risks and rewards from ownership of the asset, but has transferred control thereon.

When the Company has transferred its right to obtain cash flows from the asset or has concluded a transfer agreement, it assesses the extent to which it has retained the risks and rewards of ownership. When the Company has neither transferred, nor retained substantially all risks and rewards from ownership of the financial assets, it continues to recognise the asset transferred to the extent of its continuing interest therein. In this case, the Company also recognises the respective liability. The transferred asset and the related liability are measured on a basis reflecting the rights and obligations that the Company has retained.

Continuing involvement in the form of a guarantee on the transferred asset is measured at the lower of the two values: the initial carrying amount of the asset and the maximum amount of consideration that the Company may be required to pay.

Impairment of financial assets

The Company recognises an allowance (impairment provision) for expected credit losses for all debt instruments which are not carried at fair value through profit or loss. Expected credit losses are calculated as the difference between the contractual cash flows due under the contractual conditions, and all cash flows the Company expects to receive, discounted at the initial effective interest rate. Expected cash flows also include cash flows from the sale of collateral held or other credit enhancements that constitute an integral part of the contractual conditions.

To calculate the expected credit losses for *loans to related and third parties, incl. cash and cash equivalents at banks*, the Company applies the general impairment approach defined by IFRS 9. Under this approach, the Company applies a 3-stage impairment model based on changes versus the initial recognition of the credit quality of the financial instrument (asset).

Expected credit losses are recognised at two stages:

- a. A financial asset which is not credit impaired upon its initial recognition/acquisition is classified in Stage 1. These are loans granted: to debtors with a low risk of default with stable key indicator (financial and non-financial) trends, regularly services and without any outstanding past due amounts. Since its initial recognition, its credit risk and characteristics are subject to continuous monitoring and analyses. The expected credit losses for the financial assets classified in Stage 1 are determined based on credit losses resulting from probable events or default, which could over the next 12 months of the respective asset's lifetime (12-month expected credit losses for the instrument).
- b. When there has been a significant increase in credit risk since the initial recognition of a financial asset, and as a result its characteristics deteriorate, it is transferred to Stage 2. Expected credit losses for financial assets classified in Stage 2 are determined for the remaining lifetime of the respective asset, irrespective of the point of default (lifetime expected credit loss (ECL)).

The Company's management has developed a policy and a set of criteria to analyse, ascertain and assess the occurrence of a condition of “significant increase in credit risk”. The main aspects related thereto are disclosed in *Note 2.32*.

In the cases when the credit risk of a financial instrument increases to a level that indicates default, the financial asset is considered to be impaired, and is classified in Stage 3. At this stage, the losses incurred for the lifetime of the respective asset are identified and calculated.

The Company's management has performed the respective analyses, based on which it has determined a set of criteria for default events, in accordance with the specifics of the respective financial instrument. One of them is delay in contract payments by over 90 days, unless circumstances exist for a certain instrument that make such claim refutable. Along with that, there are other events, based on internal and external information, which indicate that the debtor is not able to repay all contract amounts due, including in consideration of all loan collaterals and reliefs held by the Company. The main aspects of the policy and the set of criteria are disclosed in *Note 2.32*.

The Company adjusts expected credit losses determined based on historical data, with forecast macroeconomic indicators for which it has been established that correlation exists and which are expected to impact the amount of future credit losses.

In order to calculate expected credit losses for *trade receivables and contract assets* the Company has elected and applies a simplified approach based on an expected credit losses calculation matrix and does not monitor subsequent changes in their credit risk. In this approach, it recognises an allowance (impairment provision) based on lifetime expected credit losses at each reporting date. The Company has developed and applies a provisioning matrix based on its historical experience with credit losses, adjusted with forecast factors specific for debtors and the economic environment, for which a correlation has been established with the percentage of credit losses (*Note 38*).

Derecognition

Impaired financial assets are derecognised when no reasonable expectation exists to collect contractual cash flows.

Financial liabilities

Initial recognition, classification and measurement

The Company’s financial assets include trade and other payables, loans and borrowings, including bank overdrafts. Upon their initial recognition, financial assets are usually classified as liabilities at amortised cost.

All financial liabilities are initially recognised at fair value, and in the case of loans and borrowings and trade and other payables, net of direct transaction costs.

Subsequent measurement

The subsequent measurement of financial liabilities depends on their classification. They are usually classified and measured at amortised cost.

Classification groups

Loans and borrowing

Following their initial recognition, the Company measures interest-bearing loans and borrowings at amortised cost, applying the effective interest method. Gains and losses are recognised in the statement of comprehensive income (within profit or loss for the year) when the respective financial liability is derecognised, as well as through amortisation based on the effective interest rate.

The amortised cost is calculated by taking into consideration any discounts or premiums at acquisition, as well as fees or costs that constitute an integral part of the effective interest rate. Amortisation is stated as a “financial expense” in the statement of comprehensive income (within profit or loss for the year).

Derecognition

Financial liabilities are derecognised when the obligation specified in the contract is discharged or cancelled or expires. An exchange between an existing borrower and lender of debt instruments with substantially different terms is accounted for as an extinguishment of the original financial liability and the recognition of a new financial liability. The difference between the respective carrying amounts is recognised in the statement of comprehensive income (within profit or loss for the year).

Offsetting (netting) of financial instruments

Financial assets and liabilities are offset and the net amount reported in the statement of financial position, if a legally enforceable right exists to offset the recognised amounts and if there is an intention to settle on a net basis or realise the asset and settle the liability simultaneously.

This requirement results from the concept of the actual economic nature of the Company’s relations with a given counterpart stating that in the simultaneous presence of these two requirements the expected actual future cash flow and rewards for the Company is the net flow, i.e. the net amount reflects the Company’s actual right and obligation resulting from these financial instruments – in all cases to only receive or pay

the net amount. If the two conditions are not simultaneously met, it is assumed that the Company's rights and obligations with respect to these offsetting financial instruments are not exhausted in all situations by only the payment or receipt of the net amount.

The offsetting policy is also related to the measurement, presentation and management of actual credit risk and the liquidity risk pursuant from these offsetting instruments.

The criteria applied to establish the “current and legally enforceable entitlement to offsetting” are:

- lack of dependence on a future event, i.e. it should not only be applicable upon the occurrence of a future event;
- the offsetting should be enforceable and legally defensible during (cumulatively):
 - the Company's usual business operations;
 - in case of default/delay, and
 - in case of insolvency.

The applicability of criteria is measured against the requirements of the Bulgarian legislation and the contractual relations between the parties. The condition of “presence of current and legally enforceable right to offsetting” is always and mandatorily assessed together with the second condition – for “mandatory settling of these instruments on a net basis”.

2.26. Financial guarantee contracts

A financial guarantee contract is a contract that requires the issuer to make certain payments to recover the holder's loss incurred when a debtor failed to make payment when due, in accordance with the initial or amended conditions of a debt instrument.

Financial guarantee contracts are recognised a financial liabilities at guarantee issuance. The liability is initially measured at fair value, and subsequently – at the higher of the following:

- the amount determined in accordance with the expected credit losses model, and
- the initially recognised amount, less the cumulative amount of the revenue (where applicable) recognised under the principles of IFRS 15 *Revenue from Contracts with Customers*.

The fair value of financial guarantees is determined based on the present value of the difference in cash flows between contract payments required under the debt instrument, and payments that would be required without a guarantee payable to a third party upon commitment.

The subsequent measurement of financial guarantee liabilities at the amount of expected losses under financial guarantee contracts is included in the statement of financial position, within “other current liabilities”.

2.27. Income taxes

Company's *current income taxes* are determined in accordance with the requirements of the Bulgarian tax legislation – the Corporate Income Taxation Act. The nominal income tax rate in Bulgaria for 2022 is 10% (2021: 10%).

Deferred income taxes are determined using the liability method on all of Company's temporary differences between the carrying amounts of the assets and liabilities and their tax bases, existing at the date of the financial statements.

Deferred tax liabilities are recognised for all taxable temporary differences, with the exception of those originating from recognition of an asset or liability, which has not affected the accounting and the taxable profit/(loss) at the transaction date.

Deferred tax assets are recognised for all deductible temporary differences and the carry-forward of unused tax losses, to the extent that it is probable they will reverse and a taxable profit will be available or taxable temporary differences might occur, against which these deductible temporary differences can be utilised, with the exception of the differences arising from the recognition of an asset or liability, which has affected neither the accounting nor taxable profit /(loss) at the transaction date.

The carrying amount of all deferred tax assets is reviewed at each reporting date and reduced to the extent that it is probable that they will reverse and sufficient taxable profit will be generated or taxable temporary differences will occur in the same period, whereby they could be deducted or compensated.

Deferred taxes related to items that are accounted for as other components of comprehensive income or an equity item in the statement of financial position, are also reported directly in the respective component of the comprehensive income or the equity item in the statement of financial position.

Deferred tax assets and liabilities are measured at the tax rates and on the bases that are expected to apply to the period and type of operations when the asset is realised or the liability – settled (repaid) on the basis of the tax laws that have been enacted or substantively enacted, and at tax rates of the country (Bulgaria) under the jurisdiction of which the respective deferred asset or liability is expected to be recovered or settled.

The deferred tax assets of the Company are presented net against its deferred tax liabilities when and as much as it is the tax payer for them in the respective jurisdiction (Bulgaria), and this is only in cases where the Company is legally entitled to perform or receive net payments of current tax liabilities or income tax receivables.

As of 31 March 2022 the deferred income tax liabilities of the Company were assessed at a rate valid for 2022, at the amount of 10% (31 December 2021: 10%).

2.28. Government grants

Government grants represent various forms of providing gratuitous resources by a government (local and central bodies and institutions) and/or intergovernmental agreements and organisations.

Government grants (municipal, government and international, including under the procedure of using the European funds and programmes) are initially recognised as deferred income (financing) when there is reasonable assurance that they will be received by the Company and that the latter has complied and complies with the associated thereto requirements.

A government grant that compensates the Company for expenses incurred is recognised in current profit or loss on a systematic basis in the same period in which the expenses are recognised.

A government grant that compensates investment expenses incurred to acquire an asset is recognised in current profit or loss on a systematic basis over the useful life of the asset proportionately to the amount of the recognised depreciation charge.

2.29. Net earnings or loss per share

The base net earnings or loss per share are calculated by dividing net profit or loss attributable to ordinary equity holders by the weighted average number of ordinary shares outstanding during the period.

The weighted average number of ordinary shares outstanding during the period is the number of ordinary shares outstanding during at the beginning of the period, adjusted by the number of ordinary shares bought back or issued during the period multiplied by a time-weighting factor. This factor represents the number of days that the shares are outstanding as a proportion of the total number of days in the period.

In case of a capitalisation, bonus issue or split, the number of the outstanding ordinary shares as at the date of such event, is adjusted as to reflect the proportional change in the number of outstanding ordinary shares as if the event has occurred in the beginning of the earliest presented period.

The diluted net earnings or loss per share are not calculated because no dilutive potential ordinary shares have been issued.

2.30. Segment reporting

The Company identifies its reporting segments and discloses segment information in accordance with the organisational and reporting structure used by the management. Operating segments are business components, which are regularly measured by members of the management who take operating decisions by using financial and operating information prepared specifically on the segment for the purposes of current monitoring and assessment of results and allocating Company's resources.

Company's operating segments are currently monitored and directed separately as each of them represents a separate business area that offers various products and bears various business risks and rewards. Company's operating segments include the business fields by individual lines of medicinal forms production – tablets, ampoules, medical products, other forms and other revenue.

Information by operating segments

The Company uses one basic measuring unit – gross margin (profit) for measuring the results in the operating segments and allocation of resources between them. The gross margin is defined as the difference between segment revenue and segment expenses directly attributable to the respective segment.

Segment assets, liabilities, respective revenue, expenses and results include those that are and can be directly attributable to the respective segment as well as such that can be allocated on a reasonable basis. Usually they include: (a) for revenue - sales of finished goods; (b) for expenses - raw materials and consumables used, depreciation and amortisation and production staff remuneration; (c) for assets - property, plant and equipment, investment property and inventories; (d) for liabilities – government grants, payables to personnel and for social security. Capital expenditures (investments) by business segments are

differentiated expenses incurred in the period of acquisition or construction of segment non-current assets, which are expected to be used for more than one period.

The Company manages its investments in securities, trade accounts and financial resources granted/received as well as taxes at entity's level and they are not allocated at segment level.

The results of the operations regarded as accidental ones compared to the main types of operations (activities) of the Company as well as revenue, expenses, liabilities and assets that are not subject to allocation are stated separately in the item 'total at Company level'. In general, these amounts include: other operating income unless originating from the operation of a particular segment, administrative expenses, interest income and expenses, realised and unrealised gains and losses from foreign currency transactions and investments, investments in other companies, trade and other receivables, trade payables and loans received, tax accounts, general-purpose production and administrative equipment.

The applied accounting policy for segment reporting is based on that used by the Company for the preparation of its statutory financial statements for public purposes.

2.31. Fair value measurement

Some of Company's assets and liabilities are measured and presented and/or just disclosed at fair value for financial reporting purposes. Such are: (a) on a recurring (annual) basis – other *long-term equity investments, investment property, bank loans to/from third parties, certain trade and other receivables and payables; and other* (b) on a non-recurring (periodical) basis – *non-financial assets such as property, plant and equipment*.

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between independent market participants at the measurement date. Fair value is an exit price and is based on the assumption that the sale transaction will take place either in the principal market for this asset or liability or in the absence of a principal market – in the most advantageous market for the asset or liability. Both the designated as a principal market and the most advantageous market are markets to which the Company must have an access.

Fair value is measured from the perspective of using the assumptions and judgments that potential market participants would use when pricing the respective asset or liability assuming that market participants act in their economic best interest.

In measuring the fair value of non-financial assets the starting point is always the assumption what would be the highest and best use of the particular asset for the market participants.

The Company applies various valuation techniques that would be relevant to the specific features of the respective conditions and for which it has sufficient available inputs while trying to use at a maximum the publicly observable information, and respectively, to minimize the use of unobservable information. It uses the three acceptable approaches – *the market approach, the income approach and the cost approach* – whereas the most frequently applied valuation techniques include directly quoted and/or adjusted quoted market prices, market comparables (analogues) and discounted cash flows, including based on capitalised rental income.

All assets and liabilities that are measured and/or disclosed in the financial statements at fair value, are categorised within the following fair value hierarchy, namely:

- Level 1 — Quoted (unadjusted) market prices in active markets for identical assets or liabilities;
- Level 2 — Valuation techniques that use inputs other than directly quoted prices but are observable, either directly or indirectly, including where the quoted prices are subject to certain adjustments; and
- Level 3 — Valuation techniques for which the lowest level input that is significant to the fair value measurement is unobservable.

For assets and liabilities that are recognised at fair value in the financial statements on a recurring basis, the Company determines at the end of each reporting period whether transfers between levels in the fair value hierarchy are deemed to be made for a particular asset or liability depending on the inputs available and used at that date.

The Company has developed internal rules and procedures for measuring the fair value of various types of assets and liabilities. For the purpose, a specifically designated individual, subordinated to the Company's Finance Director, organised the performance of the overall valuation process and also coordinates and observes the work of the external valuers.

The Company uses the expertise of external certified appraisers to determine the fair value of the following assets and liabilities: *financial assets at fair value through other comprehensive income* Level 1 and Level 2, *investment property* – Level 2, *property, plant and equipment* – Level 2 and Level 3. The choice of licensed appraisers is made on an annual basis using the following criteria: applied professional standards, professional experience and knowledge, reputation and market status. The need for rotation of external appraisers is periodically assessed – every three to five years. The applied valuation approaches and techniques as well as the used inputs for each case of fair value measurement are subject to mandatory discussion and coordination between the external experts – appraisers and the specifically designated individual, engaged with measurements, and so is the acceptance of the issued appraiser's reports – especially with regard to the significant assumptions and the final conclusions and proposals for the fair value amount. The final fair value measurements are subject to approval by Company's Finance Director and/or Chief Accountant, Executive Director and the Board of Directors.

In accordance with Company's accounting policy, at the end of each reporting period the specifically designated individual, engaged with measurements, performs a general analysis of collected in advance information about the movement in the values of the Company's assets and liabilities that are subject to valuation or to a disclosure at fair value, the type of available data and the possible factors for the observed changes, and proposes for approval to the Finance Director, the approach for measuring the fair value of the respective assets and liabilities at that date. Where necessary, this is explicitly consulted with the involved external appraisers.

The results from the process of fair value measurement are presented to the audit committee and to Company's independent auditors.

For the purposes of fair value disclosures, the Company has determined the respective assets and liabilities on the basis of their nature, basic characteristics and risks as well as of the fair value hierarchical level.

2.32. Critical accounting judgments on applying the Company's accounting policies. Key estimates and assumptions of high uncertainty.

Fair value measurement of equity investments

When the fair value of equity investments carried in the statement of financial positions cannot be obtained based on quoted prices on active markets, their fair value is determined by using other valuation models and techniques, including the discounted cash flows model.

The input used in these models is obtained from observable markets, where possible, but when this cannot be done, significant judgement is applied to determine fair values. Such judgement involves the review, analysis and assessment of input, for instance regarding liquidity risk, credit risk, and volatility. The changes in assumptions for these factors may impact the amount of the fair value of financial instruments stated. The main key assumptions and components of the model are disclosed in *Note 17*.

Calculation of expected credit losses for loans and guarantees granted, trade receivables, incl. from related parties, and cash and cash equivalents

The measurement of expected credit losses for financial assets stated at amortised cost (loans granted, contract receivables and assets, cash and cash equivalents), as well as for financial guarantees granted is an area that requires the use of complex models and material assumptions for future economic conditions and the credit behaviour of customers and debtors (for instance, the probability of counterparties not meeting their obligations and the pursuant losses).

In order to apply these requirements, the Company's management makes a number of material judgements, such as: a) determining criteria to identify and measure significant credit risk increases; b) selection of suitable models and assumptions to measure expected credit losses; c) establishing groups of similar financial assets (portfolios) for the purpose of measuring expected credit losses; d) establishing and assessing the correlation between historical default rates and the behaviour of certain macro indicators to reflect the effects of forecasts for these macro indicators in the calculation of expected credit losses. (*Note 38*).

Regarding trade receivables, including from related parties

The Company uses provisioning matrixes calculate expected credit losses from trade receivables and contract assets. The provision rates are based on days past due for groups from different customer segments (portfolios) sharing similar loss models (type of client sector).

Each provisioning matrix is initially based on detailed historical observation of default rates in the Company's receivables and the movement of receivables by delay groups. Usually, historical data is used for at least three years as per the financial statement's date. Moreover, the Company calibrates the matrix so as to adjust historically ascertained dependence for credit losses with forecast information by also using probability scenarios. If certain forecast economic conditions, measured by means of certain macro indicators, are expected to aggravate or improve in the next year, which might result in established

correlational increase in payment delays for a certain sector (type of client), the historic default rates are adjusted. At each reporting date, the observable historical default rates are updated and the effects of changes in the estimates are accounted for.

The assessment of the relation between observable historical default rates, the forecast economic conditions and expected credit losses is a significant accounting judgement.

The amount of expected credit losses is sensitive to changes in circumstances and forecast conditions. The Company’s historical credit closes and the forecast economic conditions may deviate from actual collection rates in the future.

Information about expected credit losses from trade receivables and contract losses is disclosed in *Note 19, Note 21 and Note 22*.

In 2022 impairment of trade receivables, including related parties, of BGN 151 thousand (31 December 2014) (2021: no impairment of trade receivables accrued, including related parties) (Note 8, Note 19, Note 21 and Note 22).

Regarding loans and guarantees granted:

The Company has adopted the general approach for calculating impairment based expected credit losses of the loans granted, pursuant to IFRS 9. For this purpose, the Company applies a model of its choice. Its application goes through several stages. First, the debtor’s credit rating is determined by means of several rating agencies’ methodologies for the respective economic sectors and ratios, quantitative and qualitative parameters and indicators of the entity. Second, by using statistical models including historical default probability data (PD), transfer between ratings, macro-economic data and forecast, the relevant marginal PD are calculated by year for each rating. Third, based on this analysis and the determined rating, and based on a set of indicators for the instrument’s characteristics at the date of each financial statements, the following parameters are determined: instrument stage (Stage 1, Stage 2 or Stage 3), PD needed for the instrument’s lifetime, as well as loss given default (LGD). The main formula used to calculate expected credit losses is: $ECL = EAD \times PD \times LGD$, where:

ECL is the expected credit losses indicator;

EAD is the exposure at default indicator;

PD is the probability of default indicator;

LGD is the loss given default indicator.

Upon determining losses, all guarantees and/or collaterals and/or insurances are taken into consideration. Thus, in the final step, by using all these parameters and following discount, the expected credit loss for the respective period of the respective financial assets is calculated.

Stage 1 includes loans granted which are classified as “regular” according to the internal risk classification scheme developed. These are loans granted to debtors with low default rates, regular servicing, without considerable aggravation of key indicators (financial and non-financial), and without amounts past due. The expected impairment loss for such loans is calculated based on default probability for the next 12 months and the Company’s expectation for loss amount upon exposure default over the next 12 months.

Stage 2 includes granted loans classified as “renegotiated”. These are loans with respect to which (based on a set of indicators) a significant aggravation of the credit risk related to the debtor has been established as compared to the exposure’s initial recognition. The expected impairment loss for these loans is calculated based on the default probability for the lifetime of the loan which is considered to be credit-unimpaired, and the Company’s expectations for loss amount upon exposure default over the lifetime.

Stage 3 includes granted loans which are classified as “underperforming”. These are loans for which evidence exists that the asset is credit-impaired, i.e. a credit event has occurred (according to the policy on default event eligibility). Therefore, an analysis is performed of a system of indicators used to identify the occurrence of credit losses. Impairment losses for such loans are calculated based on probability-weighted scenarios for the Company’s expectations for the loss amount of the non-performing credit-impaired exposure throughout its lifetime.

A granted loan, respectively financial assets, is credit-impaired when one or more events have occurred which have an adverse effect on expected future cash flows from this loan, accordingly financial assets.

The Company applies the same model with respect to expected credit losses from guarantees granted and certain individual receivables.

The main matters related to the policy and set of criteria to assess the Company’s exposure to credit risk related to loans granted are disclosed in *Note 38*.

Information about expected credit losses from loans and sureties and financial guarantees is disclosed in *Note 21, Note 22, Note 24 and Note 39*.

Information on expected credit losses from loans, guarantee fees and financial guarantee contracts is disclosed in *Note 18, Note 19, Note 21 and Note 36*.

In 2022 there is no accrued impairment for expected credit losses on loans (2021: the accrued impairment for expected credit losses on loans is in the amount of BGN 63 thousand, net of the recovered) (*Note 9, Note 10, Note 18, Note 19 and Note 21*). The impairment accrued for 2021 in the amount of BGN 63 thousand is netted with interest income on loans.

In 2022, no impairment was expected for expected credit losses under financial guarantee contracts (2021: none) (*Note 10 and Note 36*).

In 2022, no impairment was expected for expected credit losses on guarantee fees (2021: none). (*Note 10 and Note 36*).

Cash

To calculate expected credit losses for cash and cash equivalents at banks, the Company applies the general “three-stage” impairment model under IFRS 9. For this purpose, it applies a model based on the bank’s public ratings as determined by internationally recognised rating firms like Moody’s, Fitch, S&P, BCRA and Bloomberg. Based on this, on the one hand, PD (probability of default) indicators are set by using public data about PD referring to the rating of the respective bank, and on the other hand, through the change in the rating of the respective bank from one period to the next, the Company assesses the presence of increased credit risk. Loss given default is measured by using the above formula. Upon determining LGD, the presence of secured amounts in the respective bank accounts is taken into consideration.

Leasing contracts

The application of IFRS 16 requires the management to perform various assessments, estimates and assumptions that impact the accounting for right-of-use assets and lease liabilities. The main key assessments concern determining an appropriate discount rate and determining the term of each lease, including whether it is reasonably certain that the extension/termination options will be exercised. As a result of the uncertainty regarding these assumptions and estimates, significant adjustments may be made to the respective assets and liabilities in the future, respectively the revenue and expenses stated (*Note 29, Note 33 and Note 36*).

Revenue from contracts with customers

Upon revenue recognition and preparation of the annual financial statements, the management performs various judgements, estimates and assumptions that impact the revenue, costs, assets and liabilities accounted for and the respective disclosures thereto. As a result of the uncertainty regarding these assumptions and estimates, significant adjustments may occur in the carrying amount of the assets and liabilities concerned in the future, respectively the costs and revenue stated.

The key judgements and assumptions that materially impact the amount and term for recognition of revenue from contracts with customers are related to determining the point in time when control over the goods and/or services promised in the contract is transferred to the customer and assessment of the variable consideration for returned goods and volume rebates (*Note 2.5.1.*).

Inventories

Normal capacity

Company's normal production capacity is determined on the basis of management assessments (made after relevant analyses) for optimum load of the production facilities and return on the investments made therein, with structure of the manufactured finished goods accepted as being common for the Company. When the actually achieved volume for individual articles is below the volume at the normal production capacity, set by the Company, the relevant recalculation are made for the fixed overheads, included in the cost of stocks of finished goods and work in progress.

Impairment

At the end of each financial year, the Company reviews the state, useful life and usability of the existing inventories. In case of identified inventories bearing a potential of not being realised at their current carrying amount in the following reporting periods, the Company impairs these inventories to net realisable value.

As a result of the reviews and analyzes made in 2022 no impairment of inventories was reported (2021: none) (*Note 5*).

Revaluation of property, plant and equipment

As of 31.12.2021 a comprehensive review of the occurred price changes in the fair value of the fixed tangible assets of the company, as well as their physical and technical condition, mode of operation and residual useful life has been performed. Accordingly, a revaluation has been made, as the five-year policy period for their revaluation ends on that date. The review and re-evaluation are performed with the professional assistance of independent licensed appraisers.

The licensed appraisers have also developed a test of the sensitivity of their proposed fair value estimates, determined by the various valuation methods, according to reasonably possible changes in the underlying assumptions, and a comment on the deviations obtained.

As a result, a revaluation was reported and a new revaluation reserve was recognized in the amount of BGN 8,298 thousand, net of impairment (*Note 12*).

Goodwill impairment

At each reporting date, the management determines whether indicators exist for goodwill impairment. The calculations are made by the management with support from independent licensed appraisers.

As a result of the calculations made in 2022, there is no need to recognize impairment of goodwill (2021: none) (*Note 13*).

Impairment of investments in subsidiaries

At each reporting date, the management makes an assessment about whether indicators for impairment exist in respect of its investments in subsidiaries. The calculations were made by the management with the assistance of independent certified appraisers.

As a result of the calculations made in 2021, there is no need to recognize the impairment of certain investments in subsidiaries (2020: 3,389). (*Note 10 and Note 16*)

Impairment of investments in subsidiaries

At each date of the statement of financial position, management assesses whether there is any indication of impairment of its investments in subsidiaries. The calculations were made by the management with the assistance of independent licensed appraisers..

As a result of the calculations made in 2022, there is no need to recognize the impairment of certain investments in subsidiaries (2021: BGN 104 thousand) (*Note 15*).

Actuarial calculations

Calculations of certified actuaries have been used when determining present value of long-term payables to personnel upon retirement on the basis of assumptions for mortality rate, staff turnover rate, future salaries level and discount factor. They are disclosed in *Note 30*.

As a result of the calculations made in 2021 a liability for long-term income of the personnel in the amount of BGN 4,652 thousand was reported. (31.12.2021: BGN 4,532 thousand) (*Note 30*).

Deferred tax assets

There are unrecognised deferred tax assets at the amount of BGN 3,582 thousand (31 December 2021: BGN 3,582 thousand), related to impairment of investments in subsidiaries because the management is not planning to dispose of these investments and has concluded that it is unlikely the temporary difference to be manifested in a foreseeable future. The temporary difference on which no tax asset is recognised amounts to BGN 35,823 thousand (31 December 2021: BGN 35,823 thousand).

Litigation provisions

With regard to the pending litigations against the Company, the management, jointly with Company's lawyers, has decided that at this stage the probability and risks of a negative outcome therefrom is still below 50% and therefore, it has not included provisions for litigation payables in the statement of financial position as at 31 March 2022.

3. REVENUE

Company's revenue includes:

	2022	2021
	BGN '000	BGN '000
Revenue from contracts with customers	44,085	34,055
Other revenue	472	515
Total	44,557	34,570

3.1. The revenue from contracts with customers is from sales of medication produced and includes:

	2022	2021
	BGN '000	BGN '000
Domestic market	23,659	13,138
Export	20,426	20,917
Total	44,085	34,055

Revenue from domestic sales by product are as follows:

	2022	2021
	BGN '000	BGN '000
Tablets	12,851	7,027
Ampoules	3,990	1,625
Lyophilic products	2,547	1,174
Dressings products	1,415	1,008
Syrops	757	74
Plasters	633	547
Unguent	454	547
Sachets	276	323
Drops	228	159
Haemodialysis concentrates	158	265
Sanitary and hygienic products	131	79
Inhalers	104	187
Suppositories	88	107
Medical cosmetics	27	16
Total	23,659	13,138

Revenue from export sales by product are as follows:

	2022	2021
	BGN '000	BGN '000
Tablets	15,201	16,345
Ampoules	3,322	2,380
Unguent	675	1,370
Syrups	643	483
Drops	178	22
Suppositories	139	80
Plasters	80	53
Sachets	56	66
Medical cosmetics	52	37
Dressings products	42	60
Lyophilic products	38	17
Sanitary and hygienic products	-	4
Total	20,426	20,917

The distribution of sales revenues by geographical regions is as follows:

	2022	Relative share	2021	Relative share
	BGN '000		BGN '000	
Europe	16,816	38%	17,947	53%
Bulgaria	23,659	54%	13,138	39%
Other countries	3,610	8%	2,970	9%
Total	44,085	100%	34,055	100%

The total revenue from transaction with the largest clients of the Company is as follows:

	2022	% of	2021	% of revenue
	BGN '000	revenue	BGN '000	
Client 1	23,604	54%	13,646	31%
Client 2	6,061	14%	10,827	34%
Client 3	5,490	12%	3,180	13%

The balances on contracts with customers are as follows:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Receivables under contracts with customers – related parties, net of impairment (<i>Note 21</i>)	67,727	68,101
Receivables under contracts with customers – third parties, net of impairment (<i>Note 22</i>)	12,974	20,326
	80,701	88,427

The increase/decrease in trade receivables under contracts with customers, including receivables from related parties, is the result of an increase/decrease in operating volumes.

The liabilities for reimbursement as of 31 March 2022 amount to BGN 3 thousand (31.12.2021: BGN 630 thousand). These include liabilities under retrospective trade volume discounts payable under contracts with customers which have been or will be reimbursed over the next reporting period. (*Note 36*).

3.2. *The other revenues* of the company are from provided assets under leasing contracts and amount to BGN 472 thousand (31 March 2021: BGN 515 thousand).

4. OTHER OPERATING INCOME AND LOSSES

The other income from the company's activity is as follows:

	2022	2021
	BGN '000	BGN '000
Services rendered	442	445
Income from government grants under European projects	105	108
Written off liabilities	100	-
<i>Income on sale of goods</i>	<i>354</i>	<i>343</i>
<i>Carrying amount of goods sold</i>	<i>(312)</i>	<i>(286)</i>
Profit on sale of goods	42	57
Amounts awarded	12	-
<i>Income from sales of materials</i>	<i>340</i>	<i>290</i>
<i>Book value of sold materials</i>	<i>(330)</i>	<i>(275)</i>
Profit on sales of materials	10	15
<i>Income from sale of fixed assets</i>	<i>7</i>	<i>349</i>
<i>Carrying amount of fixed assets sold</i>	<i>(3)</i>	<i>(309)</i>
Profit/ (loss) on sale of fixed assets	4	40
Revenues from financing for agricultural land	4	4
<i>Written off liabilities under leasing contracts</i>	<i>-</i>	<i>8</i>
<i>Carrying amount of written off assets under leasing contracts</i>	<i>-</i>	<i>(8)</i>

Operating lease losses	-	-
Net profit / (loss) on foreign exchange differences on trade receivables and payables and current accounts	(41)	69
Other income	62	13
Total	740	751

Revenues from the sale of materials are mainly from the sale of substances, chemical products and packaging materials.

Services rendered include:

	2022 BGN '000	2021 BGN '000
Manufacturing services	319	277
Gamma irradiation	48	43
Laboratory analyses	31	29
Social activities	20	20
Regulatory services	8	44
Transport organisation	2	4
Other	14	28
Total	442	445

Sales of goods include:

	2022 BGN '000	2021 BGN '000
Food products	334	304
Medical supplies	14	33
Goods for technical purposes	6	6
Total	354	343

The book value of goods sold by types of goods is as follows:

	2022 BGN '000	2021 BGN '000
Food products	294	253
Medical supplies	12	28
Goods for technical purposes	6	5
Total	312	286

5. RAW MATERIALS AND CONSUMABLES USED

The *raw materials and supplies* includes:

	2022	2021
	BGN '000	BGN '000
Basic materials	13,216	10,943
Heat power	2,209	889
Electric energy	1,888	1,296
Laboratory materials	570	818
Spare parts	376	214
Technical materials	308	233
Working clothes and personal protective equipment for labour	213	210
Fuels and lubricating materials	164	113
Auxiliary materials	159	128
Water	93	163
Scrapped materials	10	2
Total	19,206	15,009

Expenses on basic materials include:

	2022	2021
	BGN '000	BGN '000
Substances	6,931	4,076
Packaging materials	2,656	2,750
Liquid and solid chemicals	1,679	1,730
Sanitary-hygienic and dressing materials	620	698
Ampoules	570	304
Vials	378	190
Aluminium and PVC foil	200	304
Tubes	129	232
Herbs	53	659
Total	13,216	10,943

6. HIRED SERVICES EXPENSE

Hired services expense includes:

	<i>2022</i>	<i>2021</i>
	<i>BGN '000</i>	<i>BGN '000</i>
Advertising and marketing services	1,091	898
Manufacturing of medical products	1,056	2,040
Consulting services	805	684
Logistic services – domestic market	588	464
Subscription fees	510	287
Building and equipment maintenance	407	432
Local taxes and charges	324	366
Transport and forwarding services	299	727
Security	293	357
State and regulatory fees	241	285
Medical care	182	190
Insurance	139	120
License remunerations	134	123
Services under civil contracts	103	128
Medicinal products registration services	100	130
Translation of documentation	98	92
Vehicles repair and maintenance	89	86
Announcements and communications	84	87
Taxes on expenses	36	54
Logistic services (export)	33	36
Fees and charges on current bank accounts	31	28
Courier services	29	32
Patent fees	21	16
Destruction of pharmaceuticals	16	20
Rentals	11	1
Commissions	2	2
Other	202	94
Total	6,924	7,779

The company has concluded long-term lease agreements for agricultural land (for 10 years and for 15 years), which have variable remuneration over the years, therefore they are not included in the scope of IFRS 16.

Remuneration due under these contracts is presented on an ongoing basis over the years in the statement of comprehensive income as “rental costs”.

In 2021, the company entered into lease agreements for the above-mentioned leases of agricultural land, transferring all its lease obligations to subtenants.

Rental costs include:

	2022 BGN '000	2021 BGN '000
Rents related to short - term leases	11	-
Rents related to lease contracts of low value assets	-	1
Total	11	1

7. EMPLOYEE BENEFITS EXPENSE

Employee benefits expense includes:

	2022 BGN '000	2021 BGN '000
Current wages and salaries	8,843	9,015
Social security contributions	1,674	1,644
Social benefits and payments	583	533
Accruals for unused leaves	750	828
Accruals for insurance over leaves	146	161
Accruals for long-term retirement benefit obligations (Note 30)	120	85
Total	12,116	12,266

8. OTHER OPERATING EXPENSES

Other expenses include:

	2022 BGN'000	2021 BGN'000
Scrapped finished products and work in progress	178	35
Written off receivables	151	-
Donations	90	98
Other taxes and payments to the budget	54	9
Representative events	53	35
Business trip costs	43	28
Training courses	24	47
Unrecognized input tax under VATA	15	30
Other	45	-
Total	653	282

9. FINANCIAL INCOME

Financial income includes:

	2022	2021
	BGN'000	BGN'000
Interest income on loans extended	585	637
Income from fees on provided guarantees and warranties	113	-
Net profit from exchange differences on receivables from the sale of a subsidiary	70	148
Net profit from exchange rate differences under lease agreements	3	-
Net gain on transactions with investments in securities	-	232
<i>incl. profits from the sale of investments in subsidiaries</i>	-	187
Total	771	1,017

10. FINANCIAL COSTS

Financial costs include:

	2022	2021
	BGN'000	BGN'000
Interest expense on loans received	108	204
Bank fees and charges on loans and guarantees	51	72
Interest expenses on leasing contracts	29	25
Net foreign exchange loss on leases	-	9
Total	188	310

11. OTHER COMPREHENSIVE INCOME

Other comprehensive income include:

	2022	2021
	BGN '000	BGN '000
Net change in the fair value of equity investments designated for measuring at fair value through other comprehensive income	156	(57)
Total comprehensive income for the year	156	(57)

12. PROPERTY, PLANT AND EQUIPMENT

The property, plant and equipment of the company are as follows:

	<i>Land and buildings</i>		<i>Plant and equipment</i>		<i>Other</i>		<i>Assets in progress</i>		<i>Total</i>	
	<i>2022 BGN '000</i>	<i>2021 BGN '000</i>	<i>2022 BGN '000</i>	<i>2021 BGN '000</i>	<i>2022 BGN '000</i>	<i>2021 BGN '000</i>	<i>2022 BGN '000</i>	<i>2021 BGN '000</i>	<i>2022 BGN '000</i>	<i>2021 BGN '000</i>
Reporting value										
Balance at 1 January	171,404	169,345	201,868	199,521	22,050	22,029	4,170	2,580	399,492	393,475
Acquired assets	120	34	165	451	98	544	2,226	5,657	2,609	6,686
Transfer to property, plant and equipment	-	975	99	2,562	593	528	(692)	(4,065)	-	-
Effect from remeasurement to fair value	-	5,266	-	1,956	-	443	-	-	-	7,665
Impairment	-	(3,883)	-	(732)	-	-	-	-	-	(4,615)
Disposals	-	(333)	(24)	(1,890)	(15)	(1,494)	-	(2)	(39)	(3,719)
Balance at 31 March	171,524	171,404	202,108	201,868	22,726	22,050	5,704	4,170	402,062	399,492
Accumulated depreciation										
Balance at 1 January	47,633	42,492	129,131	121,941	17,638	17,361	-	-	194,402	181,794
Depreciation accrued	1,361	5,724	2,431	9,306	487	1,734	-	-	4,279	16,764
Effect from remeasurement to fair value	-	(343)	-	(288)	-	(2)	-	-	-	(633)
Depreciation written off	-	(240)	(24)	(1,828)	(12)	(1,455)	-	-	(36)	(3,523)
Balance at 31 March	48,994	47,633	131,538	129,131	18,113	17,638	-	-	198,645	194,402
Balance at 31 March	122,530	123,771	70,570	72,737	4,613	4,412	5,704	4,170	203,417	205,090
Carrying amount at 1 January	123,771	126,853	72,737	77,580	4,412	4,668	4,170	2,580	205,090	211,681

The Company's *land and buildings* as at 31 March / 31 December include:

- Buildings of carrying amount BGN 74,143 thousand (31.12.2021: BGN 75,383 thousand);
- Land amount BGN 48,387 thousand (31.12.2021: BGN 48,388 thousand).

The Company's *other tangible fixed assets* as at 31 March / 31 December include:

- Transportation vehicles with carrying amount BGN 2,812 thousand (31.12.2021: BGN 2,489 thousand);
- Business inventory with carrying amount BGN 1,350 thousand (31.12.2021: BGN 1,462 thousand);

- Biological assets (carriers) with carrying amount of BGN 451 thousand (31.12.2021: BGN 461 thousand).

Cost of acquisition of tangible fixed assets as at 31 March / 31 December include:

- Advances granted for the purchase of machines and equipment – BGN 2,872 thousand (31.12.2021: BGN 1,978 thousand);
- Reconstruction of buildings - BGN 1,587 thousand (31.12.2021: BGN 1,001 thousand);
- Expenses on new buildings - BGN 952 thousand (31.12.2021: BGN 909 thousand);
- Biological assets (infertile) - BGN 138 thousand (31.12.2021: BGN 138 thousand);
- Other – BGN 155 thousand (31.12.2021: BGN 144 thousand).

As at 31 March / 31 December, the carrying amount of property, plant and equipment includes machinery and equipment, purchased using Grant Agreements under Operational Programme “Development of the Competitiveness of the Bulgarian Economy” 2007 – 2013 and Operational Programme “Energy Efficiency” (Note 28) as follows:

- for a tablet production facility at the amount of BGN 6,603 thousand (31.12.2021: BGN 6,798 thousand);
- for ampoule production at the amount of BGN 3,335 thousand (31.12.2021: BGN 3,438 thousand).
- combined exchange ventilation and air conditioning installation for the production of medical products at the amount of BGN 519 thousand (31.12.2021: BGN 534 thousand).
- for the production of innovative eye drops, “artificial tears” type, at the amount of BGN 153 thousand (31.12.2021: BGN 159 thousand)

Leasing

The assets with the right to use the company are as follows:

	<i>Lands</i>		<i>Buildings</i>		<i>Vehicles</i>		<i>Business inventory</i>		<i>Total</i>	
	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021
	BGN ‘000	BGN ‘000	BGN ‘000	BGN ‘000	BGN ‘000	BGN ‘000	BGN ‘000	BGN ‘000	BGN ‘000	BGN ‘000
Reporting value										
Balance at 1 January	9	38	3,877	4,017	2,665	2,771	116	131	6,667	6,957
Acquired assets	-	-	120	34	19	265	-	-	139	299
Written off	-	(29)	-	(174)	-	(371)	-	(15)	-	(589)
Balance at 31 March / 31 December	9	9	3,997	3,877	2,684	2,665	116	116	6,806	6,667
Accumulated depreciation										
Balance at 1 January	3	8	3,142	2,191	1,684	1,269	98	50	4,927	3,518
Depreciation accrued	1	5	286	1,125	189	762	13	55	489	1,947
Depreciation written off	-	(10)	-	(174)	-	(347)	-	(7)	-	(538)

NOTES TO THE INDIVIDUAL FINANCIAL STATEMENTS FOR THE PERIOD FROM 01.01.2022 TO 31.03.2022

Balance at 31 March / 31 December	4	3	3,428	3,142	1,873	1,684	111	98	5,416	4,927
Carrying amount at 31 March / 31 December	5	6	569	735	811	981	5	18	1,390	1,740
Carrying amount ad 1 January	6	30	735	1,826	981	1,502	18	81	1,740	3,439

The Company included the usable assets in the same position in which the assets would be represented if they were own.

The company has provided for rent fixed tangible assets of related parties with a zero carrying amount as of 31 March 2022 and 31 December 2021.

Also, fixed tangible assets with a book value as of 31 March 2022 in the amount of BGN 1,191 thousand have been leased to third parties (31.12.2021: BGN 1,212 thousand).

Other data

The book value of fully depreciated tangible fixed assets, used in the Company's activities by group, is as follows:

- Buildings – BGN 3,282 thousand (31.12.2021: BGN 3,282 thousand);
- Machines, plant and equipment – BGN 58,488 thousand (31.12.2021: BGN 56,723 thousand);
- Other – BGN 8,876 thousand (31.12.2021: BGN 8,600 thousand).

As of 31 March 2022 there were established burdens on property, plant and equipment as follows:

- Land and buildings with a carrying amount of BGN 21,024 thousand and BGN 42,434 thousand (31.12.2021: respectively BGN 21,024 thousand and BGN 43,100 thousand) (*Note 26, Note 31 and Note 37*);
- Pledges on equipment – BGN 22,436 thousand (31.12.2021: BGN 23,025 thousand) (*Note 26, Note 31 and Note 37*).

Periodical fair value remeasurement

As at 31 March 2022, property, plant and equipment were revalued with the assistance of independent licensed appraisers in order to determine the fair value of the assets, in accordance with the requirements of IFRS 13 and IAS 16.

This revaluation shall apply the following basic approaches and valuation methods to measure the fair value of the different types of tangible fixed assets:

- "Market approach" through the "Method of market analogues" - for land in regulation and agricultural land for which there is a real market, analog properties and transactions with them are observed, and is on a person basis for comparability - their market price, determined by the comparative method is accepted for fair value;

- "Cost approach" through the "Amortised recoverable amount method" and "Method based on costs for the creation or replacement of the asset" - for specialized buildings, machinery, equipment, equipment and other assets for which there is no real market and comparable sales of analogue assets – their depreciated recoverable amount based on the indexed historical value of the asset and on the basis of running costs for the creation or replacement of the asset is considered to be fair value.

• "Revenue approach" through "Capitalized income from the fertilization / production of biological assets" - for perennials of yellow acacia in the life stage of fertilization.

From the assessment made, a revaluation reserve of BGN 8,298 thousand was recognised net of impairment.

13. INTANGIBLE ASSETS

Intangible assets of the company are as follows:

	<i>Goodwill</i>		<i>Intellectual property rights</i>		<i>Software</i>		<i>Assets in progress</i>		<i>Total</i>	
	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021
	BGN '000	BGN '000	BGN '000	BGN '000	BGN '000	BGN '000	BGN '000	BGN '000	BGN '000	BGN '000
Book value										
Balance at 1 January	6,698	6,698	9,207	11,176	4,458	4,437	771	278	21,134	22,589
Additions	-	-	-	16	-	1	46	1,052	46	1,069
Transfer to intangible assets	-	-	-	537	-	22	-	(559)	-	-
Written-off	-	-	-	(2,522)	-	(2)	-	-	-	(2,524)
Balance at 31 March / 31 December	6,698	6,698	9,207	9,207	4,458	4,458	817	771	21,180	21,134
Accumulated depreciation and impairment										
Balance at 1 January	5,930	5,930	6,918	8,861	3,962	3,655	-	-	16,810	18,446
Accumulated depreciation	-	-	147	577	72	309	-	-	219	886
Depreciation written-off	-	-	-	(2,520)	-	(2)	-	-	-	(2,522)
Balance at 31 March / 31 December	5,930	5,930	7,065	6,918	4,034	3,962	-	-	17,029	16,810
Carrying amount at 31 March / 31 December	768	768	2,142	2,289	424	496	817	771	4,151	4,324
Carrying amount at 1 January	768	768	2,289	2,315	496	782	771	278	4,324	4,143

Goodwill impairment

The goodwill, which is result from the merger of subsidiaries (Bulgarian Rose – “Sevtopolis” AD, “Medica” AD and “Unipharm” AD) into the parent company (*Note 2.11*).

In 2022, there was no need to recognize impairment of goodwill (2021: none) (*Note 13*).

Intellectual property rights mainly include development products and trademarks.

Expenses for acquisition of intangible fixed assets as of 31 March / 31 December include:

- the cost of implementing a software product in the amount of BGN 210 thousand (31.12.2021: BGN 210 thousand);
- costs for the acquisition of licences and marketing authorisations for medicinal products of BGN 607 thousand (31.12.2021: BGN 561 thousand).

The carrying amount of fully amortized intangible fixed assets used in the Company's activity by asset group is as follows:

- intellectual property rights - BGN 4,645 thousand (31.12.2021: BGN 4,526 thousand);
- software products - BGN 1,971 thousand (31.12.2021: BGN 1,964 thousand).

14. INVESTMENT PROPERTY

Investment property represents buildings and the land they stand on, differentiated parts of buildings for independent use, intended for long-term lease to subsidiaries and third parties.

	31.03.2022 BGN '000	31.12.2021 BGN '000
Balance at 1 January	47,302	44,759
Additions	57	4,201
Written-off	-	(1,748)
Net profit (loss) from adjustment to fair value measurement included in profit or loss (Note 4)	-	90
Balance at 31 March / 31 December	47,359	47,302

Investments property in asset group are as follows:

Group of assets	31.03.2022 BGN '000	31.12.2021 BGN '000
Warehouse premises	44,411	44,354
Offices	1,457	1,457
Production buildings	1,036	1,036
Social objects	455	455
Total	47,359	47,302

As at 31 March 2022 there are established encumbrances on investment properties as follows:

- mortgage of warehouse premises – BGN 13,397 thousand (31.12.2021: BGN 13,397 thousand) (*Note 31 and Note 37*);
- pledges on attached equipment – BGN 4,471 thousand (31.12.2021: BGN 4,471 thousand) (*Note 31*).

The table below shows reconciliation between the opening and closing balances of the fair values of investment properties measured at Level 2:

	<i>Warehouse premises</i>	<i>Offices</i>	<i>Production buildings</i>	<i>Social objects</i>	<i>Acquisition costs</i>	<i>Total</i>
	<i>BGN '000</i>	<i>BGN'000</i>	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN'000</i>
Balance at 1 January 2021	34,627	3,189	1,003	441	5,499	44,759
Additions	-	-	-	-	4,201	4,201
Transfer	9,700	-	-	-	(9,700)	-
Written-off	(14)	(1,734)	-	-	-	(1,748)
Remeasurement to fair value through profit or loss - unrealized	41	2	33	14	-	90
Balance at 31 December 2021	44,354	1,457	1,036	455	-	47,302
Additions	57	-	-	-	-	57
Balance at 31 March 2022	44,411	1,457	1,036	455	-	47,359

15. INVESTMENTS IN SUBSIDIARIES

The carrying amount of the investments by companies is as follows:

		<i>31.03.2022</i>	<i>Interest</i>	<i>31.12.2021</i>	<i>Interest</i>
		<i>BGN '000</i>	<i>%</i>	<i>BGN '000</i>	<i>%</i>
“Sopharma Trading” AD	Bulgaria	52,428	81.34	52,428	81.34
“Sopharma Ukraine” EOOD	Ukraine	9,669	100.00	9,669	100.00
“Biopharm Engineering” AD	Bulgaria	7,111	97.15	7,111	97.15
“Veta Pharma” AD	Bulgaria	6,754	99.98	6,754	99.98
“Vitamini” AD	Ukraine	1,283	100.00	1,283	100.00
“Rap Pharma International” OOD	Moldova	1,183	80.00	1,183	80.00
“Pharmalogistica” AD	Bulgaria	961	89.39	961	89.39
“Sopharma Kazakhstan” EOOD	Kazakhstan	502	100.00	502	100.00
“Electroncommerce” EOOD	Bulgaria	384	100.00	384	100.00
“Sopharma Warsaw” EOOD	Poland	323	100.00	323	100.00
Total		80,598		80,598	
Advances granted for the acquisition of subsidiaries abroad		1,957		-	
Total		82,555		80,598	

As at 31 March 2022 the composition of the investments in subsidiaries also covers the investment in the subsidiary Sopharma Poland OOD - in liquidation, Poland and Phyto Palauzovo AD, Bulgaria, which are completely impaired (31.12.2021: fully impaired investment in Sopharma Poland OOD - in liquidation, Poland and the investment in Phyto Palauzovo AD, Bulgaria). “Sopharma” AD exercises direct control on the above-mentioned companies.

The scope of activities of the subsidiaries and the dates of their acquisition are as follows:

- “Pharmalogistica” AD – Scope of activities: secondary packaging and real estate leases. Date of acquisition – 15 August 2002.
- “Sopharma Poland” OOD – in liquidation – Scope of activities: market and public opinion research. Date of acquisition – 16 October 2003. The company is in a procedure of liquidation.
- “Electroncommerce” EOOD – Scope of activities: trade, transportation and packaging of radioactive materials and nuclear equipment, household electronics and electrical equipment. Date of acquisition – 9 August 2005.
- “Biopharm Engineering” AD – Scope of activities: manufacture and trade in solutions for infusion. Date of acquisition – 10 March 2006.
- “Sopharma Trading” AD – Scope of activities: trade in pharmaceuticals. Date of acquisition – 8 June 2006.
- “Vitamini” AD – Scope of activities: production and trade in pharmaceuticals. Date of acquisition – 18 January 2008.
- “Sopharma Warsaw” EOOD – Scope of activities: market and public opinion research. Date of acquisition – 23 November 2010.
- “Sopharma Ukraine” EOOD – Scope of activities: trade in pharmaceuticals; Date of acquisition – 7 August 2012.
- “Phyto Palauzovo” AD – Scope of activities: production, collection of crops and trade in herbs and medicinal plants. Date of acquisition (as from the merger of a subsidiary) – 1 January 2014.
- TOO “Sopharma Kazakhstan” – Scope of activities: trade in pharmaceuticals. Date of acquisition – 31 December 2014.
- “Veta Pharma” AD – Scope of activities: production of medicinal, non-medicinal and other products. Date of acquisition – 11 November 2016.
- “Rap Pharma International” OOD – Scope of activities: trade in pharmaceutical products. Date of acquisition – 14 April 2017.
- “Pharmachim” EOOD - Scope of activities: consulting services. Date of establishment – 14 April 2020.

The movement of investments in subsidiaries is presented below:

	<i>Investments in subsidiaries</i>	
	<i>31.03.2022</i>	<i>31.12.2021</i>
	<i>BGN '000</i>	<i>BGN '000</i>
Acquisition cost		
Balance at 1 January	131,517	137,624

Advances granted for the acquisition of subsidiaries	1,957	-
Sold shares with loss of control	-	(12,520)
Transfer to associates and joint ventures	-	(2,041)
Acquired additional participations	-	8,472
Sold shares without loss of control	-	(18)
Balance at 31 March / 31 December	133,474	131,517

Impairment charged

Balance at 1 January	50,919	50,815
Impairment charged	-	104
Balance at 31 March / 31 December	50,919	50,919
Carrying amount at 31 March / 31 December	82,555	80,598
Carrying amount at 1 January	80,598	86,809

Impairment of investments in subsidiaries

At each reporting date, the management makes an analysis and assessment about whether indicators for impairment exist in respect of its investments in subsidiaries.

The following are accepted as main indicators for impairment: significant volume reduction (over 25%) and/or termination of activities of the investee; loss of markets, clients or technological problems, reporting of losses for a longer period of time (over three years), reporting of negative net assets or assets below the registered share capital, trends of deterioration of main financial ratios; decrease in market capitalisation.

The tests and assumptions of the management for impairment of investments are made through the prism of its projections and intents on the future economic benefits, which are expected from the subsidiaries, including trade and industrial experience, ensuring position in the Bulgarian and in foreign markets, expectations for future sales, etc.

As a result of the calculations made in 2022, it is not necessary to recognize the impairment of certain investments in subsidiaries (2021: BGN 104 thousand).

16. INVESTMENTS IN ASSOCIATES AND JOINT VENTURES

Investments in associates and joint ventures are as follows::

	31.03.2022	Interest	31.12.2021	Interest
	BGN ,000	%	BGN ,000	%
“Sopharma Imoti” REIT	44,240	33.15	43,548	32.77
“Doverie Obedinen Holding” AD	9,243	24.998	9,243	24.998
“Momina Krepost” AD	1,694	37.46	1,694	37.46
Total	55,177		54,485	

“Doverie Obedinen Holding” AD is an associated company with subject of activity acquisition, management, valuation and sale of units and / or shareholdings in Bulgarian and foreign companies - legal entities.

“Sopharma Imoti” REIT is an associate company with the activity of investing funds raised through the issuance of securities in real estate through the purchase of property rights and other real rights over real estate, construction and improvements in them in order to provide them for management , renting, leasing, leasing and / or selling them.

The movement of investments in associates and joint ventures is presented below:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Balance at 1 January	52,791	6,062
Acquired shares in associates	692	17,920
Transfer from other long-term capital investments in subsidiaries	-	25,989
Issue of shares in associates	-	2,880
Transfer of investments in subsidiaries	-	347
Sold Shares in associates	-	(263)
Transfer to other long - term capital investments	-	(144)
Balance at 31 March / 31 December	53,483	52,791

Momina Krepost AD is a joint venture with a subject of activity development, implementation and production of medical devices for human and veterinary medicine.

The movement of investments in joint ventures is presented below:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Balance at 1 January	1,694	-
Transfer of investments in subsidiaries	-	1,694
Balance at 31 March / 31 December	1,694	1,694

Impairment of investments in associates and joint ventures

At each reporting date, the management makes an assessment about whether indicators for impairment exist in respect of its investments in associates and joint ventures.

The assessments of the management for impairment of investments are made through the prism of its projections and intents on the future economic benefits, which are expected from the associates and joint ventures, including trade and industrial experience, ensuring position in the Bulgarian and in foreign markets, expectations for future sales, etc.

In 2022, there is no need to recognize impairment of investments in associates and joint ventures.

17. OTHER LONG-TERM EQUITY INVESTMENTS

The *other long-term equity investments* include the interest (shares) in the following companies:

	31.03.2022	Interest	31.12.2021	Interest
	BGN '000	%	BGN '000	%
“Lavena” AD“	4,926	13.23	4,919	13.23
“Chimimport” AD	548	0.27	548	0.27
“Bulgarian Stock Exchange” AD	111	0.20	-	-
“Sopharma Buildings” REIT	85	10.25	85	10.25
“Imventure 1” KDS	50	1.36	50	1.36
“Central Cooperative Bank” AD	23	0.06	70	0.06
“Achieve Life Science Inc.” – USA	22	0.02	23	0.02
“Ecobulpack” AD	7	0.74	7	0.74
“UniCredit Bulbank” AD	3	0.001	3	0.001
“Expo Group” AD	1	1.04	1	1.04
Total	5,776		5,706	

All above companies except for “Achieve Life Science Inc.” - USA have their seat and operations in Bulgaria.

The fair value per share as at 31 March / 31 December is as follows:

<i>Equity investments</i>	<i>Number of shares</i>	31.03.2022		<i>Number of shares</i>	31.12.2021	
		<i>Fair value per share</i>	<i>Fair value as per the statement of financial position</i>		<i>Fair value per share</i>	<i>Fair value as per the statement of financial position</i>
		BGN	BGN '000		BGN	BGN '000
“Lavena” AD	1,312,383	3.75	4,926	1,312,102	3.75	4,919
“Chimimport” AD	555,152	0.99	548	651,045	0.84	548
“Sopharma Buildings” REIT	66,627	1.28	85	66,627	1.28	85
“Bulgarian Stock Exchange” AD	13,044	8.51	111	-	-	-
“Central Cooperative Bank” AD	17,301	1.32	23	69,934	1.01	70
“Achieve Life Science Inc.” – USA	1,796	12.30	22	1,796	12.64	23
Total			5,715			5,645

The table below presents Company's other equity investments, which are measured at fair value on a recurring basis in the individual statement of financial position:

<i>Equity investments</i>	<i>Fair value</i>	<i>Level 1</i>	<i>Level 2</i>
	31.03.2022		
	BGN'000	BGN'000	BGN'000
“Lavena” AD	4,926	-	4,926
“Chimimport” AD	548	548	-
“Bulgarian Stock Exchange” AD	111	111	-
“Sopharma Buildings” REIT	85	-	85
“Central Cooperative Bank” AD	23	23	-
“Achieve Life Science Inc.” – USA	22	22	-
Total	5,715	704	5,011

<i>Equity investments</i>	<i>Fair value</i>	<i>Level 1</i>	<i>Level 2</i>
	31.12.2021		
	BGN'000	BGN'000	BGN'000
“Lavena” AD	4,919	-	4,919
“Chimimport” AD	548	548	-
“Sopharma Buildings” REIT	85	-	85
“Central Cooperative Bank” AD	70	70	-
“Achieve Life Science Inc.” – USA	23	23	-
Total	5,645	641	5,004

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

<i>Equity investments</i>	<i>Level 1</i>	<i>Level 2</i>	<i>Total</i>
	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>
Balance at 1 January 2021	6,518	5,028	11,546
Purchases	22,189	149	22,338
Transfer to investments in associates	(25,989)	-	(25,989)
Transfer of investments in associates	-	144	144
Sales	(2,004)	(35)	(2,039)
Unrealised profit/(loss), net, included in other comprehensive income (<i>Note 11</i>)	(73)	(282)	(355)
Balance at 31 December 2021	641	5,004	5,645
Purchases	340	1	341
Sales	(427)	-	(427)
Unrealised profit/(loss), net, included in other comprehensive income (<i>Note 11</i>)	150	6	156
Balance at 31 March 2022	704	5,011	5,715

Valuation techniques and approaches

The market comparable approach was applied in the Level 2 fair value measurements. The valuation technique was based on the trading multiples method. Upon preparing fair value measurements, the Company has used the services of certified valuers.

For investments not traded on equity markets, the Company has used internal assessments by Company’s specialists. Upon the analysis of the companies subject to these internal assessments the Company has determined that the fair value of these equity investments do not materially deviate from the carrying amounts.

18. LONG-TERM RECEIVABLES FROM RELATED PARTIES

The long-term receivables from related parties include:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Long-term loans granted	51,660	49,792
Impairment for credit losses	(97)	(97)
Total	51,563	49,695

The long-term loans granted are to the following related enterprises:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Companies controlled by an associate	51,563	49,695
Total	51,563	49,695

The terms and conditions of the long-term loans granted to related parties are as follows:

Currency	Contracted amount	Maturity	Interest %	31.03.2022		31.12.2021	
	'000			BGN'000	BGN'000	BGN'000	BGN'000
					incl. interest		incl. interest
<i>To companies controlled by an associate</i>							
BGN	83,400	31.12.2025	3.00%	51,563	463	49,695	95
				51,563	463	49,695	95

The movement in the allowance for impairment of receivables from related parties under long-term loans granted is as follows:

2022	2021
BGN '000	BGN '000

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Balance on 1 January	97	118
Decrease in credit loss adjustment recognized in profit or loss for the year	-	(21)
Balance at 31 March / 31 December	97	97

The long-term loans granted to related parties are intended to support the financing of these companies' activities under common strategic objectives. They are secured by pledges on securities (shares) and promissory notes.

19. OTHER LONG-TERM RECEIVABLES

Company's *other long-term receivables* include:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
<i>Granted long-term loans</i>	6,358	6,314
<i>Impairment of credit losses</i>	(6)	(6)
Granted long-term loans, net	6,352	6,308
<i>Receivables under transactions in securities</i>	3,524	3,454
<i>Impairment of credit losses</i>	(216)	(216)
Receivables under transactions in securities, net	3,308	3,238
Total	9,660	9,546

The terms of the long-term loans granted to third parties are as follows:

<i>Currency</i>	<i>Contracted amount</i>	<i>Maturity</i>	<i>Interest rate</i>	31.03.2022		31.12.2021	
	'000			BGN'000	BGN'000	BGN'000	BGN'000
					<i>incl. interest</i>		<i>incl. interest</i>
EUR	3,000	29.06.2023	3.05%	6,352	484	6,308	440
				6,352	484	6,308	440

The movement in the allowance for impairment of receivables from third parties under long-term loans granted is as follows:

	2022	2021
	BGN '000	BGN '000
Balance on 1 January	6	12
Decrease in the credit loss allowance recognised in profit or loss for the year	-	(6)
Balance at 31 March/ 31 December	6	6

Long-term loans granted to third parties are intended to support the financing of activities of these enterprises under common strategic objectives. They are secured by pledges on securities (shares), pledges on machinery and equipment and mortgages on real estate.

Receivables from securities transactions are receivables from sold investments in subsidiaries and are as follows:

<i>Currency</i>	<i>Receivables</i>	<i>Maturity</i>	<i>31.12.2021</i>	<i>31.12.2020</i>
	<i>'000</i>		<i>BGN'000</i>	<i>BGN'000</i>
<i>USD</i>	2,000	31.03.2024	<u>3,308</u>	<u>3,238</u>
			<u>3,308</u>	<u>3,238</u>

The receivable due on 31 March 2024 is bound by the completion of certain normative actions on registrations of authorizations of medical devices.

The movement of the allowance for impairment of receivables from securities transactions is as follows:

	<i>2022</i>	<i>2021</i>
	<i>BGN '000</i>	<i>BGN '000</i>
Balance at 1 January	<u>216</u>	<u>297</u>
Reduction of the credit loss adjustment recognized in profit or loss during the year	<u>-</u>	<u>(81)</u>
Balance at 31 March/ 31 December	<u>216</u>	<u>216</u>

20. INVENTORIES

Company's *inventories* include:

	<i>31.03.2022</i>	<i>31.12.2021</i>
	<i>BGN '000</i>	<i>BGN '000</i>
Materials	32,231	31,226
Finished products	27,661	17,552
Work in progress	4,928	8,281
Semi-finished products	4,032	6,024
Goods	137	139
Total	<u>68,989</u>	<u>63,222</u>

The materials by type are as follows:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Basic materials	31,194	27,185
Technical materials	522	495
Auxiliary materials	295	279
Spare parts	203	187
Materials in the process of delivery	-	3,041
Other	17	39
Total	32,231	31,226

The main materials by type are as follows:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Substances	18,896	16,296
Chemicals	4,782	3,859
Ampoules	2,500	2,327
Packaging materials	1,880	1,640
Aluminium and PVC foil	1,235	1,059
Sanitary and hygienic and dressing materials	1,094	1,202
Herbs	348	401
<i>incl. own production</i>	26	26
Vials	297	288
Tubes	162	113
Total	31,194	27,185

The movement of herbs of own production (agricultural production, including harvested seeds of milk thistle and yellow acacia) is as follows:

	2022	2021
	BGN '000	BGN '000
Agricultural production on 1 January	26	2
Cost of production harvested during the year	-	59
Loss of fair value measurement	-	(33)
Invested in production	-	(2)
Agricultural production on 31 March/ 31 December	26	26

The finished product is as follows:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Tablets	17,091	10,807
Ampoules	2,965	2,832
Lyophilic products	1,733	-
Unguent	1,596	1,116
Dressing products	1,258	906
Syrups	1,138	393
Suppositories	417	314
Plasters	319	303
Sachets	286	295
Drops	242	227
Sanitary and hygienic products	241	187
Medical cosmetics	232	51
Hemodialysis concentrates	143	121
Total	27,661	17,552

Goods by types are as follows:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Food products	82	72
Medicinal products	55	67
Total	137	139

As of 31 March 2022 on available inventories of the company with a book value in the amount of BGN 27,661 thousand there are established pledges as collateral for bank loans (31 December 2021: BGN 23,552 thousand) (*Note 31 and Note 37*).

21. RECEIVABLES FROM RELATED PARTIES

Receivables from related parties include:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Receivables from subsidiaries	75,333	75,737
<i>Impairment of credit losses</i>	(1,858)	(1,858)
	73,475	73,879
Receivables from companies controlled by an associate	12,424	12,330

<i>Impairment of credit losses</i>	(46)	(46)
	12,378	12,284
Receivables from joint ventures	1,309	1,355
<i>Impairment for credit losses</i>	(1)	(1)
	1,308	1,354
Receivables from companies, contact through key management personnel	44	-
Receivables from associates	189	189
Total	87,394	87,706

The receivables from related parties by type are as follows:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
<i>Receivables under contracts with customers</i>	69,572	69,946
<i>Impairment of credit losses</i>	(1,845)	(1,845)
Receivables under contracts with customers, net	67,727	68,101
<i>Trade loans granted</i>	19,310	19,205
<i>Impairment of credit losses</i>	(1)	(1)
Trade loans granted, net	19,309	19,204
Receivables under sureties and guarantees	216	271
<i>Impairment for credit losses</i>	(59)	(59)
Receivables from guarantees and sureties, net	157	212
Rental deposit receivables	189	189
Advances granted	12	-
Total	87,394	87,706

The receivables under contracts with customers - related parties are interest-free and of which BGN 55,370 thousand are in BGN (31.12.2021: BGN 54,461 thousand) and in EUR – BGN 12,357 thousand (31.12.2021: BGN 13,640 thousand).

The receivables from a subsidiary with principal activities in the field of trade in pharmaceuticals were the most significant and as of 31 March 2022 amounted to BGN 55,215 thousand or 81.53% of all receivables under contracts with customers - related parties (31.12.2021: BGN 54,371 thousand – 79.84%).

The Company usually negotiates with its subsidiaries payment terms ranging from 45 to 270 days for receivables on sales of finished products and up to 90 days for receivables on sales of materials (incl. substances).

The movement in the allowance for impairment of trade receivables from related parties is as follows:

	2022 BGN '000	2021 BGN '000
Balance on 1 January	1,845	2,634
Increase in the credit loss allowance recognised within profit or loss for the year	-	1,845
Decrease in the credit loss allowance recognised within profit or loss for the year	-	(2,634)
Balance at 31 March/ 31 December	1,845	1,845

The age structure of non-matured (regular) trade receivables from related parties is as follows:

	31.03.2022 BGN '000	31.12.2021 BGN '000
up to 30 days	11,561	11,863
from 31 to 90 days	22,304	23,822
from 91 to 180 days	26,418	25,042
from 181 to 365 days	1,863	1,971
Over 365 days	4,166	4,877
<i>Gross amount of non-matured (regular) receivables from related parties</i>	<i>66,312</i>	<i>67,575</i>
<i>Impairment of credit losses</i>	<i>(1,083)</i>	<i>(1,083)</i>
Non-matured (regular) receivables from related parties, net	65,229	66,492

The impairment of credit losses of non-matured (regular) trade receivables from related parties is as follows:

	31.03.2022 BGN '000	31.12.2021 BGN '000
up to 30 days	188	188
from 31 to 90 days	382	382
from 91 to 180 days	403	403
from 181 to 365 days	32	32
Over 365	78	78
Total	1,083	1,083

The age structure of invoice date of past due trade receivables from related parties is as follows:

	31.03.2022 BGN '000	31.12.2021 BGN '000
from 31 to 90 days	23	14
from 91 to 180 days	870	365
from 180 to 365 days	1,178	1,493
over 365 days	1,189	499
<i>Gross amount of past due receivables from related parties</i>	3,260	2,371
<i>Impairment of credit losses</i>	(762)	(762)
Past due receivables from related parties, net	2,498	1,609

The Company applies the simplified approach under IFRS 9 to measure expected credit losses for trade receivables from related companies, recognizing expected losses for the entire term of the instrument for all trade receivables from related companies (Note 2.16).

Based on that, the credit loss allowance as at 31 December is determined as follows:

		Regular	Up to 90 days past due	Over 90 days past due	Over 180 days past due	Over 365 days past due	Total
31 March 2022							
Expected average percentage of credit losses		2%	1%	27%	11%	90%	
Trade receivables (gross carrying amount)	BGN '000	66,312	889	365	1,461	545	69,572
Expected credit loss (Impairment allowance)	BGN '000	(1,083)	(9)	(100)	(163)	(490)	(1,845)
31 December 2021							
Expected average percentage of credit losses		2%	2%	12%	25%	100%	
Trade receivables (gross carrying amount)	BGN '000	67,575	375	859	646	491	69,946
Expected credit loss (Impairment allowance)	BGN '000	(1,083)	(9)	(100)	(163)	(490)	(1,845)

As of 31 March 2022, special pledges have been established as collateral for received bank loans on receivables from related parties in the amount of BGN 61,715 thousand (31 December 2021: BGN 60,871 thousand) (*Note 31*).

Loans granted to related parties by type of related party are as follows:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Subsidiaries	5,637	5,584
<i>Impairment of credit losses</i>	(1)	(1)
	<u>5,636</u>	<u>5,583</u>
Companies controlled by an associate	12,367	12,274
<i>Impairment of credit losses</i>	-	-
	<u>12,367</u>	<u>12,274</u>
Joint ventures	1,306	1,347
Total	<u>19,309</u>	<u>19,204</u>

The terms and conditions of the loans granted to related parties are as follows:

<i>Currency</i>	<i>Contracted amount</i>	<i>Maturity</i>	<i>Interest %</i>	31.03.2022		31.12.2021	
	'000			BGN '000	BGN '000 incl. interest	BGN '000	BGN '000 incl. interest
<i>to subsidiaries</i>							
BGN	14,109	31.12.2022	4.10%	5,636	326	5,583	273
<i>to companies controlled by an associate</i>							
BGN	10,997	31.12.2022	3.10%	8,324	275	8,263	215
BGN	4,000	31.12.2022	3.33%	4,043	43	4,011	11
<i>To joint ventures</i>							
BGN	3,500	31.12.2022	3.50%	<u>1,306</u>	<u>4</u>	<u>1,347</u>	<u>27</u>
				<u>19,309</u>	<u>648</u>	<u>19,204</u>	<u>526</u>

The short-term loans granted to related parties are intended to support the financing of these companies' activities under common strategic objectives. They are secured by pledges on corporate shares and securities (shares) and pledges on receivables.

The movement in the allowance for impairment of loans granted to related parties is as follows:

	2022	2021
	BGN '000	BGN '000
Balance at 1 January	1	5,707
Decrease in the credit loss allowance recognised within profit or loss for the year		(5,706)
Balance at 31 March/ 31 December	1	1

The receivables under guarantees by types of related companies are as follows:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Subsidiaries	212	262
<i>Impairment for credit losses</i>	(58)	(58)
	154	204
Receivables from joint ventures	4	9
<i>Impairment for credit losses</i>	(1)	(1)
	3	8
Total	157	212

The receivables under sureties are interest-free and 3 thousand of them are in BGN (31.12.2021: BGN 73 thousand) and in EUR - BGN 154 thousand. (31.12.2021: BGN 139 thousand).

The movement of the adjustment for impairment of receivables from guarantees from related companies is as follows:

	2022	2021
	BGN '000	BGN '000
Balance at January 1	59	-
Increase in credit loss adjustment recognized in profit or loss for the year	-	59
Balance at 31 March/ 31 December	59	59

22. TRADE RECEIVABLES

Trade receivables include:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
<i>Receivables under contracts with customers</i>	14,847	22,199

<i>Impairment of credit losses</i>	(1,873)	(1,873)
Receivables under contracts with customers, net	12,974	20,326
Receivables from assignment agreements	4,890	4,890
Receivables from securities transactions	217	417
Advances granted	2,439	998
Total	20,520	26,631

The *receivables from clients* are interest-free and BGN 389 thousand are denominated in BGN (31.12.2021: BGN 448 thousand), in EUR – BGN 8,473 thousand (31.12.2021: BGN 16,126 thousand) and in USD – BGN 4,112 thousand (31 December 2021: BGN 3,752 thousand) and in other currencies - none (31.12.2020: 2 thousand).

One main counterpart of the Company is accountable for about 45.90% of the receivables from clients (31.12.2021: one main counterpart accountable for 57.19%)

The Company usually agrees with its clients payment terms from 30 to 180 days for receivables under sales except for the cases when new markets and products are being developed and new trade counterparts are being attracted.

The movement in the allowance (provision) for impairment of trade receivables from third parties is as follows:

	2022 BGN '000	2021 BGN '000
Balance at 1 January	1,873	1,692
Increase in the credit loss allowance recognised within profit or loss for the year	-	1,873
Decrease in the credit loss allowance recognised within profit or loss for the year	-	(1,692)
Balance at 31 March/ 31 December	1,873	1,873

The age structure of non-matured (regular) trade receivables is as follows:

	31.03.2022 BGN '000	31.12.2021 BGN '000
up to 30 days	1,283	6,943
from 31 to 90 days	2,234	12,160
from 91 to 180 days	2,729	657
from 181 to 365 days	57	110
<i>Gross amount of non-matured (regular) trade receivables</i>	<i>6,303</i>	<i>19,870</i>
<i>Impairment of credit losses</i>	<i>(180)</i>	<i>(180)</i>
Non-matured (regular) trade receivables, net	6,123	19,690

The Impairment of credit losses of non-matured (regular) trade receivables is as follows:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
up to 30 days	63	63
from 31 to 90 days	110	110
from 91 to 180 days	6	6
from 181 to 365 days	1	1
Total	180	180

The age structure of the invoice date for overdue trade receivables is as follows:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
from 31 to 90 days	5,832	153
from 91 to 180 days	910	108
from 181 to 365 days	72	360
over 365 days	1,730	1,708
Gross amount of past due receivables	8,544	2,329
Impairment of credit losses	(1,693)	(1,693)
Past due trade receivables, net	6,851	636

The Company applies the simplified approach under IFRS 9 to measure expected credit losses for trade receivables by recognizing expected lifetime losses for all trade receivables (Note 2.16). Based on that, the loss allowance as at 31 December is determined as follows:

31 March 2022		Regular	Up to 90 days past due	Over 90 days past due	Over 180 days past due	Over 365 days past due	Total
Expected average percentage of credit losses		3%	0%	76%	87%	95%	
Trade receivables (gross carrying amount)	BGN '000	6,303	6,733	42	507	1,262	14,847
Expected credit loss (Impairment allowance)	BGN '000	(180)	(14)	(32)	(442)	(1,205)	(1,873)
31 December 2021		Regular	Up to 90 days past due	Over 90 days past due	Over 180 days past due	Over 365 days past due	Total
Expected average percentage of credit losses		1%	3%	34%	85%	100%	

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Trade receivables (gross carrying amount)	BGN '000	19,870	506	94	518	1,211	22,199
Expected credit loss (Impairment allowance)	BGN '000	(180)	(14)	(32)	(442)	(1,205)	(1,873)

As at 31 March 2022, special pledges have been established as collateral of bank loans received on trade receivables at the amount of BGN 11,735 thousand (31.12.2021: BGN 11,735 thousand) (*Note 31 and Note 37*).

Receivables from assignment contracts are in euros, interest-free with maturity on 31.12.2022.

Receivables from securities transactions are BGN, interest-free and represent receivables from a sold investment in a subsidiary maturing on June 22, 2022. They are secured by pledges of two trademarks and a pledge of packaging design.

The *advances granted to suppliers* as at 31 March/ 31 December are for the purchase of:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Inventories	1,818	824
Services	621	174
Total	2,439	998

The *advances granted* are regular. They include: in BGN – 598 thousand (31.12.2021: BGN 504 thousand), in EUR – BGN 259 thousand (31.12.2021: BGN 54 thousand), in USD: BGN 1,429 thousand (31.12.2021: BGN 399 thousand) and in other currency – BGN 153 thousand (31.12.2021: BGN 41 thousand).

23(A). LOANS GRANTED TO THIRD PARTIES

The *loans granted to third parties* are as follow:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
<i>Commercial loans granted</i>	1,810	1,804
Total	1,810	1,804

The terms and conditions under which loans are granted to third parties are as follows:

<i>Currency</i>	<i>Contracted amount</i>	<i>Maturity</i>	<i>Interest %</i>	<i>31.03.2022</i>		<i>31.12.2021</i>	
	<i>'000</i>			<i>BGN'000</i>	<i>BGN'000 incl. interest</i>	<i>BGN'000</i>	<i>BGN'000 incl. interest</i>
<i>EUR</i>	695	12.10.2022	3.05%	1,537	178	1,527	168
<i>BGN</i>	4,184	31.12.2022	4.30%	187	-	187	-
<i>BGN</i>	949	31.12.2022	4.70%	86	-	90	-
				1,810	178	1,804	168

The loans provided to third parties are intended to support the financing of the activities of these enterprises under common strategic objectives. They are secured by pledges of securities (shares).

23(B). OTHER RECEIVABLES AND PREPAYMENTS

Other receivables and prepayments include:

	<i>31.12.2021</i>	<i>31.12.2020</i>
	<i>BGN '000</i>	<i>BGN '000</i>
Tax recovery	4,824	5,938
Prepaid expenses	943	1,054
Funds provided to an investment intermediary	294	200
Receivables under deposits granted as guarantees	139	117
<i>Awarded receivables</i>	<i>148</i>	<i>148</i>
<i>Impairment of credit losses from court and awarded receivables</i>	<i>(148)</i>	<i>(148)</i>
Awarded receivables, net	-	-
Other	155	63
Total	6,355	7,372

Taxes refundable include:

	<i>31.03.2022</i>	<i>31.12.2021</i>
	<i>BGN '000</i>	<i>BGN '000</i>
Excise duties	4,324	4,433
Income tax	340	1,222
Value added tax	160	283
Total	4,824	5,938

Prepayments include:

	<i>31.03.2022</i>	<i>31.12.2021</i>
	<i>BGN '000</i>	<i>BGN '000</i>
Subscriptions	492	631
Insurance	317	258
Licence and patent fees	106	123
Vouchers	15	15
Rentals	2	16
Other	11	11
Total	943	1,054

Deposits placed as guarantees include:

	<i>31.03.2022</i>	<i>31.12.2021</i>
	<i>BGN '000</i>	<i>BGN '000</i>
Guarantees under contracts for fuel supply	80	80
Guarantees under leasing contracts	15	12
Guarantees under contracts for supply of medicinal products	14	14
Guarantees under rental contracts	14	2
Guarantees under construction contracts	4	4
Guarantees under contracts for electricity supply	3	3
Guarantees under insurance contracts	1	1
Other	8	1
Total	139	117

The movement in the allowance for impairment of court and awarded receivables is as follows:

	<i>2022</i>	<i>2021</i>
	<i>BGN '000</i>	<i>BGN '000</i>
Balance at 1 January	148	20
Increase in the credit loss allowance recognised within profit or loss for the year	-	128
Balance at 31 March/ 31 December	148	148

24. CASH AND CASH EQUIVALENTS

Cash includes:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Cash at current bank accounts	3,882	15,510
Cash in hand	87	81
Blocked cash under issued bank guarantees	61	27
Cash and cash equivalents	4,030	15,618

Cash structure at current bank accounts is as follows: in BGN: BGN 1,804 thousand (31.12.2021: BGN 13,746 thousand), in EUR – BGN 1,844 thousand (31.12.2021: BGN 1,377 thousand), in USD – BGN 140 thousand (31.12.2021: BGN 324 thousand) and in other currency – BGN 1 thousand (31.12.2020: none).

Cash in hand is as follows: in BGN 86 thousand (31.12.2021: BGN 81 thousand) and in other currencies – 1 thousand (31.12.2021: none).

The cash blocked under bank securities issued is as follows: in BGN – BGN 54 thousand (31.12.2021: BGN 20 thousand) and in EUR – BGN 7 thousand (31.12.2021: 7 thousand).

As a result of the analyses made and the methodology applied to calculate expected credit losses for cash and cash equivalents, the management has determined that no impairment is necessary of cash and cash equivalents.

25. EQUITY

Share capital

As at 31 March 2022, the registered share capital of “Sopharma” AD amounted to BGN 134,798 thousand distributed in 134,797,899 shares of nominal value BGN 1 each.

Ordinary shares issued and fully paid	Shares number	Share capital net of treasury shares BGN '000
Balance at 1 January 2021	125,786,432	101,142
Treasury shares bought	(4,043,533)	(16,546)
Expense on treasury shares bought	-	(82)
Balance at 31 December 2021	121,742,899	84,514
Balance at 31 March 2022	121,742,899	84,514

The table below presents the paid joint-stock capital of the Company at 31 December:

	31.03.2022 BGN '000	31.12.2021 BGN '000
Share capital (registered), nominal	134,798	134,798
Premium reserve	8,785	8,785
Total paid capital	143,583	143,583

Company's shares are ordinary, non-cash, with right of dividend and liquidation share and are registered for trade in the “Bulgarian Stock Exchange – Sofia” AD and Warsaw Stock Exchange.

The *treasury shares* are 13,055,000 at the amount of BGN 50,284 thousand (31.12.2021: 13,055,000 shares at the amount of BGN 50,284 thousand). During the current year, there were no shares purchased (2021: 4,043,533 shares purchased) and no shares sold (2021: no shares sold).

The company's *reserves* are summarized in the table below:

	31.03.2022 BGN '000	31.12.2021 BGN '000
Statutory reserves	66,201	66,201
Property, plant and equipment revaluation reserve	28,464	28,614
Reserve for financial assets at fair value through other comprehensive income	1,766	1,644
Additional reserves	342,581	342,581
Total	439,012	439,040

Statutory reserves at the amount of BGN 66,201 thousand (31.12.2021: BGN 66,201 thousand) represent the Reserve Fund, which is set aside under a requirement of the Commercial Act and Company's Articles of Association, and includes two components: (a) amounts from distribution of profit for the Reserve Fund – BGN 57,416 thousand (31.12.2021: BGN 57,416 thousand), and (b) share premium representing the excess of the issue value over the nominal value of the issued shares on the merger of a subsidiary into “Sopharma” AD – BGN 8,785 thousand (31.12.2021: BGN 8,785 thousand).

The movements of statutory reserves were as follows:

	2022 BGN '000	2021 BGN '000
Balance at 1 January	66,201	63,335
Distribution of profit	-	2,866
Balance at 31 March/ 31 December	66,201	66,201

The *property, plant and equipment revaluation reserve*, amounting to BGN 28,464 thousand (31.12.2021: BGN 28,614 thousand), is formed by the positive difference between the carrying amount of

property, plant and equipment and their fair value at the date of the respective revaluation. The deferred tax effect on the revaluation reserve was directly carried to this reserve.

The movements of property, plant and equipment revaluation reserve were as follows:

	2022 BGN '000	2021 BGN '000
Balance at 1 January	28,614	21,594
Transfer to retained earnings	(150)	(448)
(Loss) / Profit from revaluation of property, plant and equipment, net	-	8,298
Deferred tax relating to revaluations	-	(830)
Balance at 31 March/ 31 December	28,464	28,614

The reserve for financial assets at fair value through other comprehensive income, amounting to BGN 1,766 thousand (31.12.2021: BGN 1,644 thousand) is formed of the effects of fair-value measurement of other long-term equity investments. Upon derecognition of these investments, the reserve formed is transferred to the “retained earnings” component.

The movements of the reserve for financial assets at fair value through other comprehensive income were as follows:

	2022 BGN '000	2021 BGN '000
Balance at 1 January	1,644	2,282
Net income from revaluation of available-for-sale financial assets	156	(355)
Transfer to retained earnings	(34)	(283)
Balance at 31 March/ 31 December	1,766	1,644

Additional reserves at the amount of BGN 342,581 thousand (31.12.2021: BGN 324,581 thousand) are formed by the distribution of profits under a decision of shareholders and can be used for payment of dividend, share capital increase as well as to cover losses.

The movements of additional reserves are as follows:

	2022 BGN '000	2021 BGN '000
Balance at 1 January	342,581	321,596
Distributed profit in the year	-	20,985
Balance at 31 March/ 31 December	342,581	342,581

Other capital components (issue warrants)

Pursuant to Article 25 of the Articles of Association of the company on 21 May 2021, the Board of Directors determines the parameters and decides on the issuance of warrants for the initial public offering. By Decision № 804 - E of 04.11.2021, the Financial Supervision Commission entered an issue in the amount of 44,932,633 dematerialized, freely transferable and registered warrants, with an issue value of BGN 0.28, issued by Sopharma AD under Art. 112 b, para. 11 of the LPOS. The underlying asset of the issued warrants are future ordinary, registered, dematerialized, freely transferable shares, giving the right to one vote in the General Meeting of Shareholders, which will be issued by the company on condition only in favor of the owners of warrants. Each subscribed warrant entitles its holder to subscribe for one share of a future issue. Holders of warrants may exercise their right to subscribe for the respective number of shares from a future increase in the company's capital within 3 years at a fixed price of BGN 4,13 per share. The right to exercise arises from the date on which the issue of warrants is registered in Central Depository AD – 16 November 2021.

The warrants have been admitted to trading on the main BSE market of the Bulgarian Stock Exchange-Sofia AD, as of 17 November 2021.

<i>Warrants issued and fully paid</i>	<i>Warrants</i>	<i>Other capital components</i>
	<i>number</i>	<i>BGN '000</i>
Balance at 1 January 2021	-	-
Warrants issued and paid	44,925,943	12,579
Transaction costs	-	(67)
Balance on 31 December 2021	44,925,943	12,512
Transaction costs	-	(2)
Balance on 31 March 2022	44,925,943	12,510

During the current year 103,115 rights were sold under warrants in the amount of BGN 103 thousand. (2021: no warrants sold).

Base net earnings per share

	<i>31.03.2022</i>	<i>31.03.2021</i>
Weighted average number of shares	121,742,899	125,786,432
Net profit for the year (BGN '000)	7,076	4,626
Base net earnings per share (BGN)	0.06	0.04

As at 31 March 2022, *retained earnings* amount at BGN 35,500 thousand (31.12.2021: BGN 28,137 thousand).

The movement in *retained earnings* is as follows:

	2022 BGN '000	2021 BGN '000
Balance at 1 January	28,137	27,039
Net profit for the year	7,076	24,271
Transfer from revaluation reserve of property, plant and equipment	150	448
Effects of sold rights on issued warrants	103	-
Transfer from reserve of financial assets at fair value through other comprehensive income	34	283
Profit distribution for reserves	-	(23,851)
Actuarial losses from remeasurement	-	(53)
Balance at 31 March/ 31 December	35,500	28,137

26. LONG-TERM BANK LOANS

Long-term bank loans include:

Currency	Contracted loan amount	Maturity	Non-current portion	31.03.2022 Current portion	Total	Non-current portion	31.12.2021 Current portion	Total
	'000		BGN'000	BGN'000	BGN'000	BGN'000	BGN'000	BGN'000
<i>Extended credit lines</i>								
EUR	10,000	31.08.2023	2,832	-	2,832	6,750	-	6,750
BGN	20,000	15.09.2024	11,310	-	11,310	-	-	-
			14,142	-	14,142	6,750	-	6,750

Bank loans received in euro are agreed at an interest rate determined on the basis of one-month EURIBOR plus a margin of 1.1 points but not less than 1.1 points and for those in BGN - average deposit index plus 1 point (2021: one-month EURIBOR plus a margin of 1.1 points, but not less than 1.1 points).

To secure these loans, the following are established:

- Mortgages of real estate with book value as at 31 March 2022: BGN 10,025 (31.12.2021: BGN 10,075 thousand) (*Note 12*);
- Special pledges on machinery and equipment with book value as at 31 March 2022: BGN 12,608 (31.12.2021: BGN 12,890 thousand) (*Note 12*).
- Receivables from related companies with book value as of 31.03.2022: BGN 6,500 thousand. (31 December 2021: none) (*Note 21*).

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The long-term bank loan contracts include clauses with covenants for maintaining certain financial ratios. Company's management currently controls the observance of these financial ratios in communication with the respective creditor bank.

Reconciliation of the movement of liabilities from financing activities

The table below shows changes in liabilities from financing activities, representing both cash and non-cash changes. Liabilities from financial liabilities are those for which cash flows are or future cash flows will be classified in the Company's statement of cash flows as cash flows from financing activities.

	01.01.2022	Changes in cash flows from financing activities	Newly arising liabilities over the year	Other non-cash changes	31.03.2022
	BGN'000	BGN'000	BGN'000	BGN'000	BGN'000
Bank loans	53,413	(16,948)	-	(50)	36,415
Liabilities under leases to related companies	587	(276)	120	11	442
Liabilities under leasing contracts to third parties	1,198	(202)	19	(22)	993
Dividends and unexercised warrant rights	269	(4)	-	-	265
Total	55,467	(17,430)	139	(61)	38,115
Treasury shares	(50,284)	-	-	-	(50,284)
Rights sold under warrants	-	103	-	-	103
Reserve for warrants issued	12,512	(2)	-	-	12,510
Net cash flows from financing activities	17,695	(17,329)	139	(61)	444

	01.01.2021	Changes in cash flows from financing activities	Newly arising liabilities over the year	Other non-cash changes	31.12.2021
	BGN'000	BGN'000	BGN'000	BGN'000	BGN'000
Bank loans	109,938	(34,213)	28	1	75,754
Liabilities under leases to related companies	2,609	-	-	(2,609)	-
Leasing liabilities to third parties	1,677	(1,928)	1,223	2,462	3,434
Dividends and unexercised warrant rights	325	(22)	14	(48)	269
Total	79,513	(24,275)	313	(84)	55,467
Treasury shares	(33,656)	(16,628)	-	-	(50,284)

Reserve for warrants issued	-	12,512	-	-	12,512
Net cash flows from financing activities	45,857	(28,391)	313	(84)	17,695

27. DEFERRED TAX LIABILITIES

Deferred income taxes as at 31 March/ 31 December are related to the following items of the statement of financial position:

<i>Deferred tax liabilities/(assets)</i>	<i>temporary difference</i>	<i>tax</i>	<i>temporary difference</i>	<i>tax</i>
	31.03.2022	31.03.2022	31.12.2021	31.12.2021
	BGN '000	BGN '000	BGN '000	BGN '000
Property, plant and equipment	68,452	6,845	69,204	6,920
<i>including revaluation reserve</i>	27,466	2,747	27,632	2,763
Investment property	11,554	1,155	11,102	1,110
<i>including revaluation reserve</i>	511	51	511	51
Intangible assets	488	49	618	62
Total deferred tax liabilities	80,494	8,049	80,924	8,092
Payables to personnel	(8,769)	(877)	(8,242)	(824)
Receivables	(4,358)	(436)	(4,358)	(436)
Inventories	(3,332)	(333)	(3,332)	(333)
Accrued liabilities	(674)	(67)	(1,096)	(110)
Total deferred tax assets	(17,133)	(1,713)	(17,028)	(1,703)
Deferred income tax liabilities, net	63,361	6,336	63,896	6,389

On recognising deferred tax assets, the probability of a reversal of the individual differences and the abilities of the Company to generate sufficient taxable profit in the future, had been taken into account.

The change in the balance of deferred taxes for 2022 is as follows:

<i>Deferred tax (liabilities)/ assets</i>	<i>Balance at 1 January 2022</i>	<i>Recognized in profit and loss</i>	<i>Recognised in equity</i>	<i>Recognised in the statement of changes in equity and the current tax return</i>	<i>Balance at 31 March 2022</i>
	BGN '000	BGN '000	BGN '000	BGN '000	BGN '000
Property, plant and equipment	(6,920)	42	-	33	(6,845)
Investment property	(1,110)	(45)	-	-	(1,155)
Intangible assets	(62)	13	-	-	(49)

NOTES TO THE INDIVIDUAL FINANCIAL STATEMENTS FOR THE PERIOD FROM 01.01.2022 TO 31.03.2022

Payables to personnel	824	53	-	-	877
Receivables	436	-	-	-	436
Inventories	333	-	-	-	333
Accrued liabilities	110	(43)	-	-	67
Total	(6,389)	20	-	33	(6,336)

The change in the balance of deferred taxes for 2021 was as follows:

<i>Deferred tax (liabilities)/ assets</i>	<i>Balance at 1 January 2021</i>	<i>Recognized in profit and loss</i>	<i>Recognised in equity</i>	<i>Recognised in the statement of changes in equity and the current tax return</i>	<i>Balance at 31 December 2021</i>
	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>
Property, plant and equipment	(6,743)	609	(830)	44	(6,920)
Investment property	(1,003)	(107)	-	-	(1,110)
Intangible assets	(103)	41	-	-	(62)
Payables to personnel	818	6	-	-	824
Receivables	1,189	(753)	-	-	436
Inventories	407	(74)	-	-	333
Accrued liabilities	77	33	-	-	110
Total	(5,358)	(245)	(830)	44	(6,389)

28. GOVERNMENT GRANTS

The government grants are under concluded contracts with the Bulgarian Small and Medium Enterprises Promotion Agency for gratuitous financial aid under Operational Programme "Development of the Competitiveness of the Bulgarian Economy" 2007-2013 and Operational Programme "Energy Efficiency".

The table below presents the non-current and the current portion of the grants received by type:

	<i>31.03.2022</i>			<i>31.12.2021</i>		
	<i>Non-current portion</i>	<i>Current portion</i>	<i>Total</i>	<i>Non-current portion</i>	<i>Current portion</i>	<i>Total</i>
	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>
Acquisition of machinery and equipment for a new tablets production line	2,056	179	2,235	2,100	179	2,279
Implementation of innovative products in the production of ampoule dosage forms	1,450	200	1,650	1,500	200	1,700

Acquisition on non-current assets and building reconstruction	293	8	301	296	8	304
Acquisition of combined exchange ventilation and air conditioning installation	72	9	81	74	9	83
Implementation of innovative “artificial tears” eye drops production	31	24	55	37	24	61
Total	3,902	420	4,322	4,007	420	4,427

The short-term part of the financing will be recognized as current income in the next 12 months from the date of the individual statement of financial position and is presented as “other current liabilities” (*Note 36*).

29. LEASING CONTRACT LIABILITIES TO THIRD PARTIES

The liabilities under the lease agreements to third parties included in the statement of financial position are presented net of the interest due in the future and are as follows:

<i>Term</i>	<i>31.03.2022</i> <i>BGN '000</i>	<i>31.12.2021</i> <i>BGN '000</i>
Up to 1 year	559	702
Over 1 year	434	496
Total	993	1,198

The minimum lease payments to third parties are due as follows:

<i>Term</i>	<i>31.03.2022</i> <i>BGN '000</i>	<i>31.12.2021</i> <i>BGN '000</i>
Up to 1 year	678	775
Over 1 year	499	624
	1,177	1,399
Future financial expense under leases contracts	(184)	(201)
Current value of operating lease obligations to related parties	993	1,198

The table below shows the obligations by types of leasing contracts to third parties:

	31.03.2022			31.12.2021		
	<i>Long-term part</i>	<i>Short-term part</i>	<i>Total</i>	<i>Long-term part</i>	<i>Short-term part</i>	<i>Total</i>
	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>
Under car lease agreements	379	448	827	413	582	995
Under lease agreements for buildings	51	97	148	79	97	176
Under land lease agreements	4	5	9	4	5	9
Under lease agreements for devices	-	9	18	-	18	18
Total	434	559	993	496	702	1,198

Liabilities under leasing contracts to third parties in BGN amount to BGN 61 thousand (31 December 2021: BGN 60 thousand), in EUR are BGN 717 thousand (31 December 2021: BGN 901 thousand), in USD - BGN 128 thousand (31 December 2021: BGN 143 thousand) and in other currencies - BGN 87 thousand (31 December 2021: BGN 94 thousand).

Lease payments due within the next 12 months are presented in the statement of financial position as "Liabilities to related parties" (*Note 36*).

The company has provided deposits under the leasing contracts as collateral for the liabilities under them in the amount of BGN 15 thousand. (31 December 2021: BGN 12 thousand) (*Note 23 b*).

30. RETIREMENT BENEFIT OBLIGATIONS

Long-term payables to personnel include:

	31.03.2022	31.12.2021
	<i>BGN '000</i>	<i>BGN '000</i>
Long-term retirement benefit obligations	4,652	4,532
Long-term benefit obligations for tantieme	262	262
Total	4,914	4,794

Long-term retirement benefit obligations

The long-term retirement benefit obligations to personnel include the present value of Company's liability at the date of the statement of financial position to pay indemnities to individuals of its employees upon coming of age for retirement.

In accordance with the Labour Code in Bulgaria, every employee is entitled to an indemnity on retirement at the amount of two gross monthly salaries, and if he or she has worked for the same employer during the last 10 years of their service the indemnity amounts to six gross monthly salaries at the time of retirement. This is a defined benefits plan (*Note 2.23*).

To determine these liabilities, the company has made an actuarial valuation as of 31.12.2021, using the services of a certified actuary.

Movements in the present value of retirement benefit obligations to personnel are as follows:

	2022 BGN '000	2021 BGN '000
Present value of the obligation at 1 January	4,532	4,478
Expense for current work experience	120	473
Interest cost	-	23
Net actuarial profit/ loss recognised for the period	-	(9)
Payments made in the year	-	(486)
Effects of ex-post assessments of retirement liabilities incl. by:	-	53
<i>Actuarial gains/ losses on changes in demographic assumptions</i>	-	(1)
<i>Actuarial gains/losses from changes in financial assumptions</i>	-	(31)
<i>Actuarial losses/ (gains) on adjustments due to past experience</i>	-	85
Present value of the obligation at 31 March/ 31 December	4,652	4,532

The amounts of long-term retirement benefits of personnel accrued in the statement of comprehensive income are as follows:

	2022 BGN '000	2021 BGN '000
Expense for current work experience	120	473
Interest expenses	-	23
Net actuarial loss recognized during the period	-	(9)
Cost components of defined benefit plans recognized in profit or loss (Note 7)	120	487

In determining the present value as of 31.12.2021, the following actuarial assumptions have been made:

- a rate based on an annual interest rate of 0.6% (2020: 0.5%) was used to determine the discount factor. The assumption made is based on the yield data of long-term government securities with a 10-year maturity;
- the assumption for the future level of salaries is based on the information provided by the management of the company and amounts to 5% annual growth compared to the previous reporting period (2020: 5%);
- mortality - according to the NSI mortality table for the total mortality of the population of Bulgaria for the period 2018 - 2020 (2020: 2017 - 2019);
- turnover rate - between 1% and 16%, depending on five different age groups (2020: between 0% and 16%);

- early retirement due to illness - between 0.03% and 0.32%, depending on five distinct age groups (2020: between 0.03% and 0.32%).

This defined benefit plan creates an exposure of the company to the following risks: investment, interest rate, longevity risk, and wage increase risk. The management of the company defines them as follows:

- for the investment - insofar as it is an unfunded plan, the company should monitor and balance the forthcoming payments on it on an ongoing basis with the provision of sufficient financial resources. Historical experience, as well as the structure of the obligation, show that the resource required by years is not material to the commonly held liquidity funds;
- for interest rates - any decrease in the yield of government securities with a similar maturity leads to an increase in the plan obligation;
- for longevity risk - the present value of the obligation to retirement staff is calculated using the best estimate and up-to-date information on the mortality of plan participants. An increase in life expectancy would have the potential to increase the debt. In recent years, there has been a relative sustainability of this indicator; and
- risks related to salary increases - the present value of the obligation to staff at retirement is calculated applying the best estimate of the future increase in the salaries of plan participants. Such an increase would increase the obligation of the plan.

Long-term liabilities for tantieme are as follows:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Long-term benefit obligations for tantieme with maturity in 2023	154	154
Long-term benefit obligations for tantieme with maturity in 2024	108	108
Total	262	262

31. SHORT-TERM BANK LOANS

Short-term bank loans include:

Currency	Contracted amount	Maturity	31.03.2022	31.12.2021
	'000		BGN '000	BGN '000
Extended bank loans (overdrafts)				
BGN	9,779	01.06.2022	9,748	9,759
BGN	20,000	31.07.2022	7,519	5,476
EUR	7,500	30.11.2022	3,788	-
BGN	20,000	31.05.2022	1,218	19,967
			22,273	35,202
Extended credit lines				
BGN	20,000	31.01.2022	-	11,461
			-	11,461

Total	22,273	46,663
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The received bank loans in EUR are agreed at an interest rate determined on the basis of one-month EURIBOR plus a margin of 1.5 points, and for those in BGN - from 1.3% to 1.45% (2021: loans in EUR are agreed at an interest rate, determined on the basis of one-month EURIBOR plus a surcharge of 1.5 points, and for those in BGN - from 1.3% to 1.45% and an average deposit index plus 1 point). The loans are for working capital.

The following collateral has been established:

- Mortgages of real estate with a carrying amount of BGN 18,696 thousand as at 31 March 2022 (31.12.2021: BGN 18,801 thousand) (*Note 12 and Note 14*);
- Special pledges on:
 - machines and equipment with a carrying amount of BGN 14,299 thousand as at 31 March 2022 (31.12.2021: BGN 14,606 thousand) (*Note 12 and Note 14*);
 - inventories with a carrying amount of BGN 55,215 thousand as at 31 March 2022 (31.12.2021: BGN 26,876 thousand) (*Note 20*);
 - receivables from related parties with a carrying amount of BGN 55,215 thousand as at 31 March 2022 BGN (31.12.2020: BGN 60,871 thousand) (*Note 21*);
 - trade receivables with a carrying amount of BGN 11,735 thousand as at 31 March 2022 (31.12.2021: BGN 11,735 thousand) (*Note 22*);
 - trade receivables from third parties of a subsidiary with a carrying amount of BGN 7,823 thousand as at 31 March 2022 (31.12.2021: BGN 7,823 thousand).

The short-term bank loan contracts include clauses with covenants for maintaining certain financial ratios. Company's management currently controls the observance of these financial ratios in communication with the respective creditor bank.

32. TRADE PAYABLES

Trade payables include:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Payables to suppliers	10,519	12,033
Advances received	289	638
Total	10,808	12,671

Payables to suppliers by type are as follows:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Payables to suppliers for inventories	4,561	6,882
Payables to suppliers for services	3,855	4,085
Payables to suppliers for long – term assets	2,103	1,066

Total	10,519	12,033
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Payables to suppliers are as follows:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Payables to local suppliers	6,951	5,310
Payables to foreign suppliers	3,568	6,723
Total	10,519	12,033

The payables to suppliers are regular and interest-free. The payables in BGN amount to BGN 6,783 thousand (31.12.2021: BGN 5,002 thousand), in EUR – BGN 2,879 thousand (31.12.2021: BGN 4,314 thousand), in USD – BGN 839 thousand (31.12.2021: BGN 2,980 thousand), and in other currency – BGN 18 thousand (31.12.2021: BGN 7 thousand).

The common credit period for which no interest is charged on trade payables, is 180 days. The Company has no past due trade payables.

Advances received from customers are for purchases of:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Finished products	285	604
Services	4	34
Total	289	638

The advances received from customers as at 31 March/ 31 December are current. Of these, in BGN are 4 thousand (31.12.2021: BGN 38 thousand), in EUR are BGN 197 thousand (31.12.2021: BGN 600 thousand) and in USD – BGN 88 thousand (31.12.2021: none).

The Company has placed deposits as security for payables to suppliers under commercial transactions at the amount of BGN 185 thousand (31.12.2021: BGN 132 thousand) (*Note 22, Note 23b, Note 24 and Note 31*).

33. PAYABLES TO RELATED PARTIES

The payables to related parties refer to:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Liabilities to companies related through key managing personnel	2,140	830
Liabilities to associates	443	605
Liabilities to shareholders with significant influence	214	97
Liabilities to subsidiaries	83	69
Liabilities to companies controlled by an associate	6	8

Total	2,886	1,609
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The payables to related parties by type are as follows:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Liabilities for delivery of inventories	2,140	847
Liabilities under leasing contracts	442	587
Supply of services	304	175
Total	2,886	1,609

Liabilities under related leases to related parties arose in connection with the rental of buildings and are presented net of future interest due and are as follows:

<i>Term</i>	31.03.2022	31.12.2021
	BGN '000	BGN '000
Up to one year	442	587
Total	442	587

The minimum lease payments to related companies are due as follows:

<i>Term</i>	31.03.2022	31.12.2021
	BGN '000	BGN '000
Up to one year	460	612
	460	612
Future financial cost of leasing	(18)	(25)
Present value of lease liabilities to related companies	442	587

Liabilities to related companies are current. The BGN liabilities amount to BGN 2,361 thousand. (31 December 2021: BGN 953 thousand), in euros - 481 thousand. BGN (31 December 2021: BGN 647 thousand) and in Polish zlotys - BGN 44 thousand. (31 December 2021: BGN 9 thousand).

The common credit period, for which no interest is charged on trade payables to related parties, is 90 days. The Company has no overdue trade payables to related parties.

The term of the contracts is 1 August 2022.

The company has provided a deposit under the leasing contracts as collateral for the liabilities under them in the amount of BGN 189 thousand (31.12.2021: BGN 189 thousand) (*Note 23 b*).

34. TAX PAYABLES

Tax payables include:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Taxes on expenses	797	401
Personal income taxes	504	299
Total	1,301	700

The company and its subsidiaries have undergone tax audits as follows:

“Sopharma” AD:

- under VAT Act – until 31 December 2011;
- full-scope tax audit – until 31 December 2011;
- National Social Security Institute – until 31 September 2013.

“Bulgarian Rose – “Sevtopolis” AD (transforming company)

- under VAT Act – until 31 December 2014;
- full-scope tax audit – until 31 December 2013;
- National Social Security Institute – until 31 December 2013.

“Medica” AD (transforming company)

- under VAT Act – until 31 January 2013;
- full-scope tax audit – until 31 December 2002;
- National Social Security Institute – until 31 December 2016.

“Unipharm” AD (transforming company)

- under VAT Act – until 31 August 2018;
- full-scope tax audit – until 31 December 2017;
- National Social Security Institute – until 31 December 2017.

Tax audit is performed within a 5-year period after the end of the year when the tax return for the respective liability has been submitted. The tax audit confirms finally the tax liability of the respective company-tax liable person except in the cases explicitly stated by law.

35. PAYABLES TO PERSONNEL AND FOR SOCIAL SECURITY

Payables to personnel and for social security are as follows:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
Payables to personnel, including:	6,971	6,846
<i>tantieme</i>	3,374	3,396

<i>accruals on unused compensated leaves</i>	2,091	1,635
<i>current liabilities</i>	1,506	1,815
Payables for social security/health insurance, including:	1,288	1,188
<i>current liabilities</i>	909	902
<i>accruals on unused compensated leaves</i>	379	286
Total	8,259	8,034

36. OTHER CURRENT LIABILITIES

Other current liabilities are as follows:

	31.03.2022	31.12.2021
	BGN '000	BGN '000
<i>Provision for financial guarantees granted (Note 2.26)</i>	666	666
Liabilities under leasing contracts to third parties (<i>Note 39</i>)	559	702
Government grants (<i>Note 28</i>)	420	420
Dividend liabilities and unexercised rights for warrants	265	269
Deductions from salaries	51	85
Reimbursement obligations under contracts with clients (<i>Note 2.5.6</i>)	3	630
Liabilities for financial deposits received as guarantees	1	1
Liabilities for recovery of exercised rights for warrants	-	6
Other	-	4
Total	1,965	2,783

The provision for financial guarantees granted, at the amount of BGN 666 thousand (31.12.2021: BGN 666 thousand), arises as a result of commitment undertaken by the Company to perform payments for a debtor which failed to make payment in accordance with a debt instrument (*Note 2.26*).

The movement in the provision for financial guarantees is as follows:

	2022	2021
	BGN '000	BGN '000
Balance at 1 January	666	427
Increase in provision for financial guarantees recognized in profit or loss during the year	-	312
Decrease in provision for financial guarantees recognized in profit or loss during the year	-	(73)
Balance at 31 March/ 31 December	666	666

The commitments made by the company to make certain payments on behalf of a debtor who has not made a payment in accordance with a debt instrument are as follows:

	<i>2022</i> <i>BGN '000</i>	<i>2021</i> <i>BGN '000</i>
Commitments to banks - creditors on debt instruments of related companies	664	664
Commitments to banks - creditors on debt instruments of third parties	<u>2</u>	<u>2</u>
Total	<u>666</u>	<u>666</u>

37. CONTINGENT LIABILITIES AND COMMITMENTS

Significant irrevocable agreements and commitments

The Company received government grants under Operational Programme "Development of the Competitiveness of the Bulgarian Economy" 2007 – 2013 and Operational Programme "Energy Efficiency" (Note 28 and Note 36), related to the acquisition of long - term assets and renovations of buildings and technological renovation and modernisation of tablet production facilities and implementation of innovative products in the ampoule production section, the acquisition of combined exchanger installations for ventilation and air conditioning in the production of medical products and implementation of innovative “artificial tears” eye drops (Note 12). The Company undertook a commitment that for a period of 5 years after the completion of the respective projects they shall not be subject to significant modifications affecting the essence and the terms and conditions for their execution or giving rise to unjustified benefits to the company, neither modifications resulting from a change in the nature of ownership over the assets acquired in relation to the grants. On non-compliance with these requirements, the financing shall be returned. At the date of preparation of the financial statements, all contractual requirements were being fulfilled.

Issued and granted guarantees

The Company has provided the following collateral in favour of banks under loans received by related parties:

a) under loans of subsidiaries:

- Mortgages of real estate with a carrying amount of BGN 43,379 thousand as at 31 March 2022 (31.12.2021: BGN 43,844 thousand) (Note 12);
- Special pledges on:
 - Machines and equipment with a carrying amount of BGN 12,608 thousand as at 31 March 2022 (31.12.2020: BGN 12,890 thousand) (Note 12);
 - Inventories with a carrying amount of BGN 17,000 thousand as at 31 March 2022 (31.12.2021: BGN 17,000 thousand) (Note 20);
 - Trade receivables with a carrying amount of BGN 11,735 thousand as at 31 March 2022 (31.12.2021: BGN 11,735 thousand) (Note 22).

b) on loans to associates:

- real estate mortgages with carrying amount of BGN 14,780 thousand as at 31 March 2022 (31.12.2021: BGN 14,876 thousand) (*Note 12*);

The Company is a co-debtor and guarantor under received bank loans and issued bank guarantees and concluded lease agreements of the following companies:

Company	Maturity	Currency	Guarantee amount as at		
			Original currency	BGN '000	31.03.2022 BGN '000
“Sopharma Trading” AD	2022-2025	EUR	67,822	132,648	92,159
“Sopharma Trading” AD	2022-2024	BGN	92,125	92,125	78,903
“Sopharma Trading” Doo, Belgrade	2024-2026	EUR	35,010	68,474	30,290
“Doverie obedinen holding” AD	2027	BGN	30,000	30,000	25,009
“Doverie obedinen holding” AD	2022	EUR	5,000	9,779	9,779
“Momina Krepost” AD	2022-2026	BGN	5,000	5,000	3,923
“Biopharm Engineering” AD	2023-2028	BGN	7,750	7,750	2,806
PAO “Vitamini” and “Sopharma Ukraine” EOOD	2022	EUR	7,000	13,691	2,701
“Energoinvestment” AD	2023	BGN	2,000	2,000	1,600
“Pharmaplant” AD	2023	BGN	235	460	69
Total					247,239

38. FINANCIAL RISK MANAGEMENT

In the ordinary course of business, the Company can be exposed to a variety of financial risks the most important of which are market risk (including currency risk, risk of a change in the fair value and price risk), credit risk, liquidity risk and risk of interest-bearing cash flows. The general risk management is focused on the difficulty to forecast the financial markets and to achieve minimizing the potential negative effects that might affect the financial results and position of the Company.

The financial risks are currently identified, measured and monitored through various control mechanisms in order to establish adequate prices for the Company’s finished products and services and the borrowed thereby capital, as well as to assess adequately the market circumstance of its investments and the forms for maintenance of free liquid funds through preventing undue risk concentrations.

Risk management is currently performed by Company’s management following the policy adopted by the Board of Directors. The latter has approved the basic principles of general financial risk management, on the basis of which specific procedures have been established for management of the different types of specific risk such as currency, price, interest, credit and liquidity risk and the risk in using non-derivative instruments.

The structure of financial assets and liabilities is as follows:

<i>Financial assets</i>	<i>31.03.2022</i>	<i>31.12.2021</i>
	<i>BGN '000</i>	<i>BGN '000</i>
Financial assets at fair value through other comprehensive income, incl.:		
	<u>5,776</u>	<u>5,706</u>
<i>Equity investments</i>	5,776	5,706
Financial assets at amortised cost, incl.:	<u>172,665</u>	<u>190,119</u>
<i>Receivables and loans granted, incl.:</i>	<u>168,635</u>	<u>174,501</u>
Long - term receivables from related parties	51,563	49,695
Other long - term receivables	9,660	9,546
Receivables from related parties	87,382	87,706
Trade receivables	18,081	25,633
Loans granted to third parties	1,810	1,804
Other current receivables	139	117
<i>Cash and cash equivalents</i>	<u>4,030</u>	<u>15,618</u>
Total financial assets	<u>178,441</u>	<u>195,825</u>
 <i>Financial liabilities</i>	 <i>31.03.2022</i>	 <i>31.12.2021</i>
	<i>BGN '000</i>	<i>BGN '000</i>
Financial liabilities at amortised cost, incl.:		
<i>Long-term and short-term bank loans</i>	<u>36,415</u>	<u>53,413</u>
<i>Liabilities under leases to related companies</i>	<u>442</u>	<u>587</u>
<i>Liabilities under leasing contracts to third parties</i>	<u>993</u>	<u>1,198</u>
<i>Other loans and payables, incl.</i>	<u>13,229</u>	<u>13,331</u>
Trade obligations	10,519	12,033
Liabilities to related parties	2,444	1,022
Other current liabilities	266	276
Total financial liabilities	<u>51,079</u>	<u>68,529</u>

As of 31 March 2022 the recognized liabilities under financial guarantees amount to BGN 666 thousand (31 December 2021: BGN 666 thousand) (Note 36).

Credit risk

Credit risk is the risk that any of the Company's clients will fail to discharge in full and within the normally envisaged terms the amounts due.

The Company's credit risk arises both from its operating activities, through its trade receivables, and from its financing activities, including granting loans to related and third parties, commitments undertaken under loans and guarantees, and bank deposits. The Company has developed policies, procedures and rules for credit risk control and monitoring.

Trade receivables

In its commercial practice, the Company has applied different distribution schemes until arriving at the current effective approach that takes into consideration the market operational condition, the various payment methods, and the inclusion of sales rebates. The Company works with counterparts with whom it has a history on its main markets, and partners with over 70 Bulgarian and foreign licensed distributors of medicinal products.

The work with the NHIF and with distributors working with state hospitals also requires the adoption of a deferred payment policy. In this sense, even though credit risk concentration exists, this risk is controlled by means of selection, ongoing monitoring of the liquidity and financial stability of sales partners, as well as direct communication therewith and seeking quick measures upon indications for problems.

The Company's credit policy envisages assessing each new customer's creditworthiness before proposing standard delivery and payment conditions.

Expected credit losses are calculated at the date of each reporting period.

The Company uses provisioning matrixes to calculate expected credit losses from trade receivables and contract assets. The latter are grouped into groups (portfolios) from various client segments sharing similar characteristics, incl. for credit risk.

The percentages applied in the provisioning matrix are based on days past due for each portfolio.

Each matrix percentage is initially determined based on historical data observed by the Company for a period of three years. The method is based on analysis of the history and assessing behaviour for each invoice within a group issued over at least the last three years, including pays past due, going period by period among the different past due ranges, payments and outstanding receivables, etc. Based on that, the loss percentage is determined as bad debt for the given group of factors versus past due invoices by days. The Company does not have a practice to request collateral of trade receivables, and does not insure them.

Second, the Company makes the impairment provisioning matrixes for each portfolio precise by adjusting certain percentages based on historical data for the behaviour of payments under the invoices issued and historical losses from bad debt, by including scenarios and forecast information about certain macro factors. Historical percentages are adjusted to reflect the effect of the future behaviour of macroeconomic factors for which a statistical dependence has been identified and which are considered to impact the customers' ability to service and settle their payables.

Given the short-term horizon of the receivables and forecasts of international institutions (EC, IMF, World Bank) for the next 2022 year for the development of the Bulgarian and world economy, the management analysis shows that the effects of changes in the Macroeconomic environment on the provisioning matrix are immaterial in size to 31 December 2021.

Court and awarded receivables

Upon determining the collectability of court and awarded receivables, the management analyses on an individual basis the overall exposure from each counterpart (counterpart type) in order to determine the actual likelihood of their collection. Upon establishing it is highly unlikely to collect a given receivable (group of receivables), it is assessed what portion thereof is secured (pledge, mortgage, guarantors, bank security) to thus guarantee collectability (through potential future realisation of the collateral or payment by the guarantor).

The receivables or portion thereof for which the management determines are highly unlikely to be collected, are 100% impaired.

Loans and financial guarantees granted

The assessment of each credit exposure for the management’s purposes is a process that requires the use of models to reflect impact on exposure by changes in market conditions and the debtor’s operation, estimated cash flows and time left to maturity. The assessment of the credit risk of loans granted leads to further judgement on the possibility of default, on the loss coefficients related to this judgement and to correlation between counterparts. The Company measures credit risk by using probability of default (PD), exposure at default (EAD) and loss given default (LGD).

To determine the credit risk of loans and financial guarantees granted, and of certain individual trade receivables, the Company’s management has developed a methodology that includes two main components: determining the debtor’s credit rating, and statistical models for calculating marginal PR by year for each rating. With respect to the rating, it uses internal credit ratings of its counterparts based on the global methodologies of world’s leading rating agencies. The rating reflects financial indebtedness, liquidity, profitability ratios, etc. quantitative (for instance, sales volumes) and qualitative (for instance, financial policy, diversifications, etc.) criteria depending on the respective methodology and industry.

By means of statistical models based on historical global data about probability of default (PD) and transitions between different ratings, as well as forecasts for key macroeconomic indicators (GDP growth, inflation, etc.), the necessary marginal PD are determined by year for each rating.

Based on the specific rating established and the analysis of the debtor’s characteristics and the loan/guarantee, incl. changes which have occurred therein compared to the prior period, the instrument’s stage is determined (Stage 1, Stage 2, and Stage 3). The Company considers that a financial instrument has undergone a significant increase in credit risk when one or more of the following quantitative or qualitative criteria are met:

Quantitative criteria:

- Increase in the likelihood of default (PD) for the life of the financial asset at the reporting date compared to the likelihood of a life of default at the date when the asset was first recognized;
- The borrower is past due more than 30 days but less than 90 days;
- Actual or anticipated significant adverse changes in the borrower's operating results beyond the allowable change range measured through the principal financial and operating indicators of the borrower;
- A significant change in the value of the collateral expected to increase the loss and the risk of default.

Quality criteria:

- Significant adverse changes in the business, financial and / or economic conditions under which the borrower operates;
- Actual or expected significant adverse changes in the borrower's operating results;
- A significant change in the value of the collateral expected to increase the loss and the risk of default.
- Early signs of cash flow / liquidity problems, such as delays in servicing lenders / loans.

The criteria used to identify a substantial increase in credit risk are monitored, and their viability is reviewed on a periodic basis by the Company’s Finance Director.

The Company defines a financial instrument in default and with a credit loss when it meets one or more of the following criteria:

Quantitative criteria:

- The borrower is past due more than 90 days;
- Substantial adverse changes and events in the business, financial conditions and business environment of the borrower have occurred or are expected to occur, as measured by a serious decline in the principal financial and operating indicators of the debtor;
- The borrower reports a series of losses and negative net assets;
- Substantial or forthcoming material adverse changes in the value of the key loan collateral, incl. loss of collateral.

Quality criteria:

The borrower is unable to pay due to significant financial difficulties. These are cases where:

- The borrower is in breach of the financing contract, e.g. interest payments, collateral;
- Negative changes in the borrower's business;
- Discounts were made in relation to the borrower's financial difficulties;
- The borrower is likely to be declared bankrupt.
-

The default definition is applied sequentially to model the probability of default (PD), default exposure (EAD) and default loss (LGD) over the calculation of the company's expected losses.

Expected credit losses are calculated by discounting the resulting value of the product of: probability of default (PD), default exposure (EAD), and default loss (LGD), determined as follows:

- PD represents the possibility that the borrower will default on its financial obligation either over the next 12 months or throughout the life of the financial asset (PD for life) determined on the basis of public PD data of generally accepted sources and statistical models for the effects of forecast macroeconomic factors . The company's management has also performed a historical analysis and identified the main economic variables affecting credit risk and expected credit losses for each type of loan (portfolio);
- EAD is the amount due to the company by the borrower at the time of default, over the next 12 months, or over the remaining loan period, determined according to the specific characteristics of the instrument (amount due, repayment plans, interest rates, term, etc.);
- LGD represents the Company's expectation of the amount of default loss. LGD varies by counterparty type, claim type and seniority, and availability of collateral or other credit support. LGD is measured as the percentage of loss for open exposure at default;
- The discount rate used in the calculation of the expected credit loss (ECL) is the original effective interest rate on the loan or, in the case of financial guarantees and other instruments, with no applicable interest rate - risk-free rate for the relevant period, currency, etc.

NOTES TO THE INDIVIDUAL FINANCIAL STATEMENTS FOR THE PERIOD FROM 01.01.2022 TO 31.03.2022

The Company applies a number of policies and practices to lower the credit risk from loans granted. Most frequently, it accepts collateral. The Company assigns valuation to external experts – independent valuers, of the collateral received, as part of the process of granting loans. This valuation is reviewed on a periodic basis, but at least once per year.

The tables below presents the quality of financial assets, contractual assets and financial guarantee contracts of the company, as well as the maximum exposure to credit risk according to the credit rating accepted as of 31 March 2022:

<i>Financial assets</i>	<i>Note</i>	<i>Internal credit risk categorization</i>	<i>Expected credit losses (IFRS 9)</i>	<i>Gross book value BGN '000</i>	<i>Impairment loss (adjustment) BGN '000</i>	<i>Book value As at 31.03.2022 BGN '000</i>
Trade receivables from related parties	21	not applicable	<i>For 12 – months period</i>	69,572	(1,845)	67,727
Long-term loans granted to related parties	18	Regular loans (Stage 1)	<i>Lifetime (secured)</i>	51,660	(97)	51,563
Trade receivables from third parties	19,22	not applicable	<i>For 12 – months period</i>	23,477	(2,088)	21,389
Short-term loans granted to related parties	21	Renegotiated (Stage 2)	<i>Lifetime (secured)</i>	15,267	(1)	15,266
Long-term loans granted to third parties	19	Renegotiated (Stage 2)	<i>Lifetime (secured)</i>	6,358	(6)	6,352
Short-term loans granted to related parties	21	Regular loans (Stage 1)	<i>Lifetime (secured)</i>	4,043	-	4,043
Short-term loans granted to third parties	23 (a)	Renegotiated (Stage 2)	<i>Lifetime (secured)</i>	1,810	-	1,810
Receivables from guarantees provided to related parties	21	not applicable	<i>For 12 – months period</i>	216	(59)	157
Deposit receivables under leasing contracts	21	not applicable	<i>For 12 – months period</i>	189	-	189
Total:				172,592	(4,096)	168,496

NOTES TO THE INDIVIDUAL FINANCIAL STATEMENTS FOR THE PERIOD FROM 01.01.2022 TO 31.03.2022

The table below presents the quality of financial assets, contractual assets and financial guarantee contracts of the company, as well as the maximum exposure to credit risk according to the credit rating accepted as of 31 December 2021:

<i>Financial assets</i>	<i>Note</i>	<i>Internal credit risk categorization</i>	<i>Expected credit losses (IFRS 9)</i>	<i>Gross book value</i>	<i>Impairment loss (adjustment)</i>	<i>Book value as at 31.12.2021</i>
				<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>
Trade receivables from related parties	21	not applicable	<i>For 12 – months period</i>	69,947	(1,845)	68,102
Long-term loans granted to related parties	18	Regular Stage 1	<i>Lifetime (secured)</i>	49,792	(97)	49,695
Trade receivables from third parties	19,22	not applicable	<i>For 12 – months period</i>	30,960	(2,089)	28,871
Short-term loans granted to related parties	21	Renegotiated loans (Stage 2)	<i>Lifetime (secured)</i>	15,194	(1)	15,193
Long-term loans granted to third parties	19	Renegotiated loans (Stage 2)	<i>Lifetime (secured)</i>	6,314	(6)	6,308
Short-term loans granted to related parties	21	Regular Stage 1	<i>Lifetime (secured)</i>	4,011	-	4,011
Short-term loans granted to third parties	23 (a)	Renegotiated loans (Stage 2)	<i>Lifetime (secured)</i>	1,804	-	1,804
Receivables from guarantees provided by related parties	21	not applicable	<i>For 12 – months period</i>	271	(59)	212
Receivables on provided deposit under leasing contracts	21	not applicable	<i>For 12 – months period</i>	189	-	189
Financial assets				178,481	(4,097)	174,384

The table below provides information about the Company’s exposure to credit risk and the impairment of credit losses for loans granted and trade receivables as at 31 March 2022:

<i>Category</i>	<i>Correlation to an external credit rating</i>	<i>Average percentage of expected impairment loss</i>	<i>Gross carrying amount as of 31.03.2022</i>	<i>Impairment loss (allowance) as of 31.03.2022</i>
			<i>BGN '000</i>	<i>BGN '000</i>

NOTES TO THE INDIVIDUAL FINANCIAL STATEMENTS FOR THE PERIOD FROM 01.01.2022 TO 31.03.2022

Regular trade receivables (Stage 1)	<i>not applicable</i>	4.23%	93,049	(3,933)
Regular loans (Stage 1)	B3	0.19%	51,660	(97)
Renegotiated loans (Stage 2)	B3	0.03%	16,219	(6)
Renegotiated loans (Stage 2)	B1	0.02%	5,636	(1)
Regular loans (Stage 1)	B1	0.00%	4,044	-
Renegotiated loans (Stage 2)	Ba3	0.00%	1,306	-
Renegotiated loans (Stage 2)	B2	0.00%	273	-
Receivables from guarantees provided	not applicable	27.31%	216	(59)
Receivables on provided deposit under leasing contracts	<i>not applicable</i>	0.00%	189	-
Uncollectible trade receivables (court and award receivables)	<i>not applicable</i>	100.00%	148	(148)
Total:			172,740	(4,244)

The table below provides information about the Company’s exposure to credit risk and the impairment of credit losses for loans granted and trade receivables as at 31 December 2021:

<i>Category</i>	Correlation to an external credit rating	Average percentage of expected impairment loss	Gross carrying amount as of 31.12.2021 BGN '000	Impairment loss (allowance) as of 31.12.2021 BGN '000
Regular Trade Receivables (Stage 1)	<i>not applicable</i>	3.67%	100,906	(3,933)
Regular loans (Stage 1)	B3	0.20%	49,792	(97)
Renegotiated loans (Stage 2)	B3	0.23%	16,104	(6)
Renegotiated loans (Stage 2)	B1	0.20%	5,584	(1)
Regular loans (Stage 1)	B1	0.00%	4,011	-
Renegotiated loans (Stage 2)	Ba3	0.00%	1,347	-
Renegotiated loans (Stage 2)	B2	0.00%	277	-
Receivables under guarantees and sureties provided	<i>not applicable</i>		271	(59)
Receivables on provided deposit under leasing contracts	<i>not applicable</i>	100.00%	189	-
Uncollectible trade receivables (court and award receivables)	<i>not applicable</i>	100.00%	148	(148)
Total:			178,629	(4,244)

The Company has concentration of receivables from related parties (trade receivables and loans), as follows:

31.03.2022	31.12.2021
BGN '000	BGN '000

Client 1	46%	45%
Client 2	41%	41%

The Company monitors concentration of receivables from related parties on a current basis by applying credit limits and additional collaterals in the form of pledge on securities and other assets and applying promissory notes.

The Company has concentration of trade receivables from a client who is not a related party, amounting to 45.90% of all trade receivables (31.12.2021: 57.19%) (*Note 22*).

Cash

The Company’s cash and payment operations are concentrated in different first-class banks. A rating model is applied to calculate expected credit losses on cash and cash equivalents, using bank ratings determined by internationally recognized rating companies such as Moody's, Fitch, S&P, BCRA and Bloomberg and PD benchmarks (default probabilities) corresponding to the rating of the respective bank. The management monitors changes in a bank’s rating on an ongoing basis in order to assess the presence of increased credit risk, ensure the current management of incoming and outgoing cash flows and the allocation of cash in the bank accounts and banks.

Foreign currency risk

The Company performs its activities with an active exchange with foreign suppliers and clients. Therefore, it is exposed to currency risk mainly in respect of USD. The Company supplies part of its basic raw and other materials in USD. The currency risk is related with the adverse floating of the exchange rate of USD against BGN in future business transactions as to the recognised assets and liabilities denominated in foreign currency and as to the net investments in foreign companies.

The remaining part of Company's operations is usually denominated in BGN and/or EUR. The Company sells significant part of its finished products in Euro and thus eliminates the currency risk. The accounts and balances with the subsidiaries in Ukraine are also denominated in Euro. Nevertheless, in relation with the instability in the country and the devaluation of the Ukrainian Hryvnia, for the purpose of mitigating the currency risk the Company, through its subsidiaries, exercises currency policy that includes the immediate translation in EUR of proceeds in a local currency as well as using higher trade margins to compensate eventual future devaluation of the Hryvnia.

To control foreign currency risk, the Company has introduced a system for planning import supplies, sales in foreign currency as well as procedures for daily monitoring of US dollar exchange rate movements and control on pending payments.

The assets and liabilities denominated in BGN and foreign currency are presented as follows:

31 March 2022	in USD	in EUR	in BGN	in other currency	Total
	BGN '000	BGN '000	BGN '000	BGN '000	BGN '000
Equity investments	22	-	5,754	-	5,776

NOTES TO THE INDIVIDUAL FINANCIAL STATEMENTS FOR THE PERIOD FROM 01.01.2022 TO 31.03.2022

Receivables and loans granted	7,430	33,969	127,234	2	168,635
Cash and cash equivalents	140	1,851	1,944	95	4,030
Total financial assets	7,592	35,820	134,932	97	178,441
Long-term and short-term bank loans	-	6,620	29,795	-	36,415
Liabilities under leases to related companies	-	442	-	-	442
Leasing contract liabilities to third parties	128	717	61	87	993
Other loans and liabilities	839	2,918	9,410	62	13,229
Total financial liabilities	967	10,697	39,266	149	51,079

<i>31 December 2021</i>	in USD	in EUR	in BGN	in other currency	Total
	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>
Equity investments	23	-	5,683	-	5,706
Receivables and loans granted	7,000	42,836	124,664	1	174,501
Cash and cash equivalents	324	1,384	13,847	63	15,618
Total financial assets	7,347	44,220	144,194	64	195,825
Long-term and short-term bank loans	-	6,750	46,663	-	53,413
Leasing liabilities to related parties	-	587	-	-	587
Leasing liabilities to third parties	143	901	60	94	1,198
Other loans and liabilities	2,980	4,374	6,231	16	13,601
Total financial liabilities	3,123	12,612	52,954	110	68,799

Foreign currency sensitivity analysis

The effect of Company's sensitivity to 10% increase/decrease in current exchange rates of BGN to USD and to other currency exposures, based on the structure of foreign currency assets and liabilities at 31 December and on the assumption that the influence of all other variables is ignored, the end effect has been measured and presented as impact on the post-tax financial result and on the equity.

		USD	
		31.03.2022	31.03.2021
		BGN '000	BGN '000
Financial result	+	596	395
Accumulated profits	+	596	395
Financial result	-	(596)	(395)
Accumulated profits	-	(596)	(395)

In case of 10% increase in the exchange rate of USD to BGN, the final effect on post-tax profit of the Company for 2022 would be an increase by BGN 596 thousand (8.42%) (2021: increase at the amount of BGN 395 thousand) (8.54%). The same effect in terms of value would be seen on equity – 'retained earnings' component.

On 10% decrease in the exchange rate of USD to BGN, the ultimate impact on the (post-tax) profit of the Company would be equal and reciprocal of the stated above.

The impact of the remaining currencies (other than USD) on 10% increase in their exchange rates to BGN on Company's (post-tax) profit is insignificant. The ultimate effect thereon for 2022 is a decrease by BGN 76 thousand (-1.07 %) (2021: a decrease by BGN 8 thousand (-0.18%). The effect on equity is of the same amount and in a direction of increase / decrease and reflects in the component 'retained earnings'.

The management is of the opinion that the presented above currency sensitivity analysis, based on the balance sheet structure of foreign currency denominated assets and liabilities, is representative for the currency sensitivity of the Company for the year.

Price risk

On the one hand, the Company is exposed to price risk due to two main factors:

- (a) contingent increase of supplier prices of raw and starting materials, since more than 80% of the raw and starting materials are imported and they represent 50% on the average of all production costs; and
- (b) growing competition on the Bulgarian pharmaceutical market is also reflected in drug prices.

For the purpose of mitigating this influence, the Company applies a strategy aimed at optimization of production costs, validation of alternative suppliers that offer beneficial commercial conditions, expanding product range by means of new generic products development and last but not least, adoption of a flexible marketing and price policy. Price policy is a function of three main factors – structure of expenses, prices of competitors and purchasing capacity of customers.

On the other hand, the Company is exposed to a price risk related to the held thereby shares, classified as other long-term equity investments. For this purpose, the management monitors and analyses all changes in security markets and also uses consulting services of one of the most authoritative in the country investments intermediaries. At this stage, because of the economic and financial crisis, the management has taken a decision for a significant reduction in its operations on stock markets, retaining of the purchased shares for longer periods with current monitoring of the reported by the respective issuer financial and business indicators.

Liquidity risk

Liquidity risk is the adverse situation when the Company encounters difficulty in meeting unconditionally all of its obligations within their maturity.

The Company generates and maintains a sufficient volume of liquid funds. An internal source of liquid funds for the Company is its main economic activity generating sufficient operational flows. Banks and other permanent counterparts represent external sources of funding. To isolate any possible liquidity risk, the Company implements a system of alternative mechanisms of acts and prognoses, the final aim being to maintain good liquidity and, respectively, ability to finance its economic activities. This is complemented by the monitoring of due dates and maturity of assets and liabilities as well as control of cash outflows.

Maturity analysis

The table below presents the financial non-derivative liabilities of the Company, grouped by remaining term to maturity, determined against the contractual maturity at the reporting date. The table is prepared on the basis of undiscounted cash flows and the earliest date on which a payable becomes due for payment. The amounts include principal and interest.

31 March 2022	up to 1 month	1 to 3 months	3 to 6 months	6 to 12 months	1 to 2 years	2 to 5 years	Total
	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>
Long-term and short-term bank loans	37	11,037	7,629	3,868	3,027	11,413	37,011
Leasing contract liabilities to related parties	92	184	184	-	-	-	460
Leasing contract liabilities to third parties	91	156	176	255	291	208	1,177
Other loans and payables	5,804	7,081	78	266	-	-	13,229
Total liabilities	6,024	18,458	8,067	4,389	3,318	11,621	51,877

31 December 2021	up to 1 month	1 to 3 months	3 to 6 months	6 to 12 months	1 to 2 years	2 to 5 years	Total
	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>
Long-term and short-term bank loans	11,549	111	29,832	5,536	6,825	-	53,853
Leasing contract liabilities to related parties	87	175	262	88	-	-	612
Leasing contract liabilities to third parties	71	153	231	343	345	256	1,399
Other loans and payables	8,089	5,225	12	275	-	-	13,601
Total liabilities	19,796	5,664	30,337	6,242	7,170	256	69,465

Risk of interest-bearing cash flows

Interest-bearing assets are presented in the structure of Company's assets by cash, bank deposits and loans granted, which are with fixed interest rate. Company's borrowings in the form of long-term and short-term loans are usually with a floating interest rate. Operating lease liabilities are both floating rate and fixed rate. This circumstance makes the cash flows of the Company partially dependent on interest risk. This risk is covered in two ways:

- (a) optimisation of the sources of credit resources for achieving relatively lower price of attracted funds; and
- (b) combined structure of interest rates on loans comprising two components – a permanent one and a variable one, the correlation between them, as well as their absolute value, can be achieved and maintained in a proportion favourable for the Company. The fixed component has a relatively low absolute value and sufficiently high relative share in the total interest rate. This circumstance eliminates the probability of a significant change in interest rate levels in case of variable component updating. Thus the probability for an unfavourable change of cash flows is reduced to a minimum.

The Company's management currently monitors and analyses its exposure to changes in interest rates. Simulations are carried out for various scenarios of refinancing, renewal of existing positions, and alternative financing. The impact of a defined interest rate shift, expressed in points or percentage, on the financial result and equity is calculated based on these scenarios. For each simulation, the same assumption for interest rate shift is used for all major currencies. The calculations are made for major interest-bearing positions.

<i>31 March 2022</i>	Interest-free	With floating	With fixed	Total
	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>
Equity investments	5,776	-	-	5,776
Receivables and loans granted	91,375	-	77,260	168,635
Cash and cash equivalents	148	3,882	-	4,030
Total financial assets	97,299	3,882	77,260	178,441
Long-term and short-term bank loans	-	36,415	-	36,415
Liabilities under leasing contracts to related parties	-	-	442	442
Liabilities under leasing contracts to third parties	-	98	895	993
Other loans and liabilities	13,229	-	-	13,229
Total financial assets	13,260	36,482	1,337	51,079
<i>31 December 2021</i>	Interest-free	With floating	With fixed	Total
	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>	<i>BGN '000</i>
Equity investments	5,706	-	-	5,706
Receivables and loans granted	98,719	-	75,782	174,501
Cash and cash equivalents	108	15,510	-	15,618
Total financial assets	104,533	15,510	75,782	195,825
Long-term and short-term bank loans	31	53,382	-	53,413
Leasing contract liabilities to related parties	-	-	587	587
Leasing contract liabilities to third parties	-	103	1,095	1,198
Other loans and liabilities	13,601	-	-	13,601

Total financial assets	<u>13,632</u>	<u>53,485</u>	<u>1,682</u>	<u>68,799</u>
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The table below demonstrates the Company's sensitivity to possible changes in interest rates by 0.50 points based on the structure of assets and liabilities as at 31 December and with the assumption that the influence of all other variables is ignored. The effect is measured and presented as impact on the financial result after taxes and on equity.

2022

	<i>Increase/ decrease in interest rate</i>	<i>Impact on post-tax financial result profit/(loss)</i>	<i>Impact on equity increase/(decrease)</i>
EUR	Increase	(35)	(35)
BGN	Increase	(135)	(135)
USD	Increase	(1)	(1)
EUR	Decrease	35	35
BGN	Decrease	135	135
USD	Decrease	1	1

2021

	<i>Increase/ decrease in interest rate</i>	<i>Impact on post-tax financial result profit/(loss)</i>	<i>Impact on equity increase/(decrease)</i>
EUR	Increase	(37)	(37)
BGN	Increase	(211)	(211)
USD	Increase	(1)	(1)
EUR	Decrease	37	37
BGN	Decrease	211	211
USD	Decrease	1	1

Capital risk management

The capital management objectives of the Company are to build and maintain capabilities to continue its operation as a going concern and to provide return on the investments of shareholders and economic benefits to other stakeholders and participants in its business as well as to maintain an optimal capital structure to reduce the cost of capital.

The Company currently monitors capital availability and structure on the basis of the gearing ratio. This ratio is calculated as net debt divided by the total amount of employed capital. Net debt is calculated as the difference between total borrowings, as presented in the statement of financial position, and cash and cash equivalents. Total employed capital is calculated as the sum of equity and net debt.

In 2022, the strategy of the Company management was to maintain the ratio within 5% – 10% (2021: 5% – 10%).

The table below shows the gearing ratios based on capital structure:

Capital risk management

	2022	2021
	BGN '000	BGN '000
Total borrowings, including:	37,850	55,198
<i>bank loans</i>	<i>36,415</i>	<i>53,413</i>
<i>leasing contract liabilities related companies</i>	<i>442</i>	<i>587</i>
<i>leasing contract liabilities to third parties</i>	<i>993</i>	<i>1,198</i>
Less: Cash and cash equivalents	(4,030)	(15,618)
Net debt	33,820	39,580
Total equity	571,536	564,203
Total capital	605,356	603,783
 Gearing ratio	 0.06	 0.07

The liabilities shown in the table are disclosed in *Notes 24, 26, 29, 31, 33 and 36*.

Fair value measurement

The fair value concept presumes realisation of financial assets through a sale based on the position, assumptions and judgments of independent market participants in a principal or most advantageous market for a particular asset or liability. The Company acknowledges as a principal market for its financial assets and liabilities the financial market in Bulgaria – the Bulgarian Stock Exchange, the large commercial banks – dealers, and for some specific instruments – direct transactions between the parties. However, in most cases especially in regard of trade receivables and payables as well as loans and deposits, the Company expects to realise these financial assets also through their total refund or respectively, settlement over time. Therefore, they are presented at amortised cost.

In addition, a large part of the financial assets and liabilities are either short-term in their nature (trade receivables and payables, short-term loans) or are presented in the statement of financial position at market value determined by applying a particular valuation method (investments in securities, loans with floating interest rate) and therefore, their fair value is almost equal to their carrying amount. With regard to loans, extended with fixed interest rate, the method used for setting this rate uses as a starting point for the calculations the current observations of the Company with regard to the market interest levels.

As far as the Bulgarian market of various financial instruments is still not sufficiently active – with stability, satisfactory volumes and liquidity for purchases and sales of certain financial assets and liabilities – there are no sufficient and reliable market price quotations for them, and for this reason, the Company uses other alternative valuation methods and techniques.

Company's management is of the opinion that the estimates of the financial assets and liabilities presented in the statement of financial position are as reliable, adequate and trustworthy as possible for financial reporting purposes under the existing circumstances.

39. RELATED PARTY TRANSACTIONS

The companies related to “Sopharma” AD and the type of their relationship are as follows:

<i>Related parties</i>	<i>Relation type</i>	<i>Relation period</i>
“Donev Investments Holding” AD	Company shareholder with significant influence	2021 and 2022
“Telecomplect invest”AD	Company shareholder with significant influence	2021 and 2022
“Sopharma Trading” AD	Subsidiary	2021 and 2022
“Pharmalogistica” AD	Subsidiary	2021 and 2022
“Sopharma Poland” OOD – in liquidation	Subsidiary	2021 and 2022
“Electroncommerce” EOOD	Subsidiary	2021 and 2022
“Biopharm Engineering” AD	Subsidiary	2021 and 2022
“Vitamina” AD	Subsidiary	2021 and 2022
“Sopharma Buildings” REIT	Subsidiary	Until 07.06.2021
“Momina Krepost” AD	Subsidiary	until 9 March 2021
“Momina Krepost” AD	Joint venture	Since 10 March 2021 and 2022
“Briz”OOD	Subsidiary	until 30.12.2021
“Sopharma Warsaw” EOOD	Subsidiary	2021 and 2022
“Sopharma Ukraine” EOOD	Subsidiary	2021 and 2022
“Sopharma Kazakhstan” EOOD	Subsidiary	2021 and 2022
“Phyto Palauzovo” AD	Subsidiary	2021 and 2022
“Veta Pharma” AD	Subsidiary	2021 and 2022
“Rap Pharma International” OOD	Subsidiary	2021 and 2022
“Pharmahim” EOOD	Subsidiary	2021 and 2022
“Sopharma Trading” OOD, Serbia	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy” EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy” 2 EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy” 3 EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy” 4 EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy” 5 EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy” 6 EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy” 7 EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy” 8 EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy” 9 EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy” 10 EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy” 11 EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy” 12 EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy” 13 EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022

NOTES TO THE INDIVIDUAL FINANCIAL STATEMENTS FOR THE PERIOD FROM 01.01.2022 TO 31.03.2022

This is a translation from Bulgarian of the Individual financial statements of “Sopharma” AD.

“SOPHARMA” AD

NOTES TO THE INDIVIDUAL FINANCIAL STATEMENTS FOR THE PERIOD FROM 01.01.2022 TO 31.03.2022

“Sopharmacy” 60 EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy” 61 EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy” 62 EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy” 63 EOOD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Sopharmacy 64” AD	Subsidiary through “Sopharma Trading” AD	2021 and 2022
“Brititrade” COOO	Subsidiary through “Briz” OOD	until 31.11.2021
OOO “Tabina”	Subsidiary through “Briz” OOD	until 31.11.2021
ZAO “Interpharm”	Subsidiary through “Briz” OOD	until 31.11.2021
OOO “Farmacevt Plus”	Subsidiary through “Briz” OOD	until 31.11.2021
BOOO “SpetzApharmacia”	Joint venture through “Briz” OOD	until 31.11.2021
OOO “Bellerophon”	Joint venture through “Briz” OOD	until 31.11.2021
ODO “Alenpharm Plus”	Subsidiary through “Briz” OOD	until 31.11.2021
ODO “Salyus Line”	Subsidiary through “Briz” OOD	until 31.11.2021
ODO “Medjel”	Subsidiary through “Briz” OOD	until 31.11.2021
OOO “GalenaPharm”	Subsidiary through “Briz” OOD	until 31.11.2021
OOO “Zdorovei”	Subsidiary through “Briz” OOD	until 31.11.2021
UAB “Recesus”	Subsidiary through “Briz” OOD	until 31.11.2021
OOO “Zdorovei Pharm”	Subsidiary through “Briz” OOD	until 31.11.2021
Sia “Briz Trading”	Subsidiary through “Briz” OOD	Since 15 February 2021 until 30.12.2021
SIA BAH	Subsidiary through “Briz” OOD	Since 02.11.2021 until 30.11.2021
“Sopharma Imoti” REIT	Associate	Since 08.12.2021
“Doverie Obedinen Holding” AD	Associate	2021 and 2022
Companies to DOH group	Companies controlled by an associate	2021 and 2022
“Sofprint Group” AD	Company related through key management personnel	2021 and 2022
“Sofconsult Group” AD	Company related through key management personnel	2021 and 2022
“VES electroinvest systems” EOOD	Company related through key management personnel	2021 and 2022
“Eco Solar Invest” OOD	Company related through key management personnel	2021 and 2022
“Sirius”OOD	Company related through key management personnel	until 14 June 2021
„Mill village Stefanovo“ EOOD	Company related through key management personnel	until 14 June 2021
“OKP Investments” OOD	Company related through key management personnel	until 14 June 2021
“Alpha in” EOOD	Company related through key management personnel	2021 and 2022
“Sopharma Buildings” REIT	Associate	Since 7 June 2021 to 10 June 2021
“Consumpharm” OOD	Company related through key management personnel	Since 14 June 2021 and 2022

The sales made by Sopharma AD to companies related to it as of 31 March are as follows:

<i>Sales to related parties</i>	2022	2021
	BGN '000	BGN '000
<i>Sales of finished products to:</i>		
Subsidiaries	31,706	17,993
	31,706	17,993
<i>Interest on loans granted to:</i>		
Company controlled by an associate	463	484
Subsidiaries	54	132
Joint ventures	11	1
	528	617
<i>Sales of services to:</i>		
Subsidiaries	603	535
Associates	2	2
Companies related through key management personnel	-	13
	605	550
<i>Sales of goods and materials to:</i>		
Companies related through key management personnel	307	194
Subsidiaries	126	93
	433	287
<i>Fees and guarantees of:</i>		
Subsidiaries	109	-
Joint venture	4	-
	113	-
Total sales of related companies	33,385	19,447

The deliveries made to Sopharma AD by companies related to it as of 31 March are as follows:

<i>Supplies from related parties</i>	2022	2021
	BGN '000	BGN '000
<i>Supply of inventories from:</i>		
Companies related through key management personnel	2,579	2,424
Joint venture	44	-
Associates	13	-
Subsidiaries	1	23
Company controlled by an associate	1	15

	<u>2,638</u>	<u>2,462</u>
<i>Supply of services from:</i>		
Subsidiaries	887	818
Company controlled by an associate	188	197
Shareholder companies with significant influence	97	91
Associates	73	-
Companies related through key management personnel	57	45
	<u>1,302</u>	<u>1,151</u>
<i>Deliveries of fixed assets related to leasing contracts from:</i>		
Associates	276	-
	<u>276</u>	<u>-</u>
<i>Deliveries of investment properties from:</i>		
Subsidiaries	57	-
	<u>57</u>	<u>-</u>
<i>Other deliveries from:</i>		
Subsidiaries	1	1
	<u>1</u>	<u>1</u>
Total deliveries from related companies	<u>4,274</u>	<u>3,614</u>

The conditions under which the transactions with the related companies were carried out do not deviate from the market for such transactions.

The accounts and balances with related parties are presented in *Notes 18, 21, and 33*.

The members of the key personnel are disclosed in *Note 1*.

Salaries and other short-term benefits of key managing personnel are current and amount to BGN 243 thousand (2021: BGN 243 thousand).

40. EVENTS AFTER THE REPORTING PERIOD

There are no events after the date of the balance sheet which require adjustments or disclosures in the separate financial statements.