

Annex 9

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

Facts and circumstances to disclosed

as at 31.12.2021 for issuers

Sopharma Group

1.1. Change of the persons exercising control over the company.

No change - no such people.

1.6. No opening of bankruptcy proceedings against the Company or its subsidiary or any significant events related to production.

1.7. Conclusion or execution of significant transactions

There are no significant transactions beyond the ordinary course of business.

1.8. There are no agreements for conclusion, termination and cancellation of joint venture.

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

On June 7, 2021 “Sopharma” AD terminated its agreement for joint management of “Sopharma Buildings” REIT with “Donev investments holding” AD.

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

1.30. No initiation or termination of a court or arbitration proceedings relating to claims or liabilities of the Company or its subsidiary, with the price of the claim at least 10% of the Company's equity.

1.31. Purchase, sale or pledge of shares in companies of the issuer or its subsidiary

The structure of the Group includes “Sopharma” AD as a parent company and the subsidiaries stated below:

<i>Subsidiaries</i>	<i>31.12.2021</i>	<i>31.12.2020</i>	<i>Date of acquisition of control</i>	<i>Date of disposal of control</i>
<i>Companies in Bulgaria</i>	<i>Interest %</i>	<i>Interest %</i>		
Sopharma Trading AD	81.34	76.17	08.06.2006	
Pharmalogistica AD	89.39	89.39	15.08.2002	
Electroncommerce EOOD	100.00	100.00	09.08.2005	
Biopharm Engineering AD	97.15	97.15	10.03.2006	
Sopharma Buildings REIT	-	40.38	04.08.2008	07.06.2021

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Momina Krepost AD	-	60.93	01.01.2008	10.03.2021
Phyto Palauzovo AD	95.00	95.00	21.09.2012	
Veta Pharma AD	99.98	99.98	11.11.2016	
Aromania OOD	-	-	31.07.2017	23.12.2020
Sopharmacy EOOD**	81.34	76.17	19.01.2015	
Sopharmacy 2 EOOD**	81.34	76.17	17.06.2015	
Sopharmacy 3 EOOD**	81.34	76.17	02.12.2015	
Sopharmacy 4 EOOD**	81.34	76.17	29.02.2016	
Sopharmacy 5 EOOD**	81.34	76.17	01.03.2016	
Sopharmacy 6 EOOD**	81.34	76.17	03.12.2015	
Sopharmacy 7 EOOD**	81.34	76.17	15.03.2017	
Sopharmacy 8 EOOD**	81.34	76.17	27.06.2017	
Sopharmacy 9 EOOD**	81.34	76.17	11.09.2017	
Sopharmacy 10 EOOD**	81.34	76.17	11.09.2017	
Sopharmacy 11 EOOD**	81.34	76.17	07.12.2017	
Sopharmacy 12 EOOD**	81.34	76.17	07.12.2017	
Sopharmacy 13 EOOD**	81.34	76.17	07.12.2017	
Sopharmacy 14 EOOD**	81.34	76.17	07.12.2017	
Sopharmacy 15 EOOD**	81.34	76.17	07.12.2017	
Sopharmacy 16 EOOD**	81.34	76.17	15.05.2018	
Sopharmacy 17 EOOD**	81.34	76.17	15.05.2018	
Sopharmacy 18 EOOD**	81.34	76.17	28.02.2019	
Sopharmacy 19 EOOD (Valentina Vassileva – Lyulin EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 20 EOOD (Vasilka Lilovska EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 21 EOOD (Venera Mutashka EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 22 EOOD (Veselka Vassileva EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 23 EOOD (Victoria Angelova EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 24 (Desislava Yordanova EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 25 (Dimka Vladeva EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 26 (Donka Chivganova EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 27 (Ekaterina Mihaylova – Shumen 1 EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 28 (Elka Neykova EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 29 (Emilia Angelova EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 30 (Zhuliana Kotova EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 31 (Ivan Ivanov-1 EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 32 (Iliana Kalushkova EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 33 (Irina Toncheva EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 34 (Kapka Nikolova – Voenna Bolnica EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 35 (Kostadin Gorchev EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 36 (Krasimira Shunina EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 37 (Lora Doncheva EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 38 (Lyudmila Zlatkova EOOD) **	81.34	76.17	01.10.2020	
Sopharmacy 39 (Lyudmila Kovacheva EOOD) **	81.34	76.17	01.10.2020	

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Sopharmacy 40 (Manik Burhazyan EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 41 (Mariyka Zhaygarova EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 42 (Maria Agova EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 43 (Maria Gancheva EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 44 (Maria Kenova EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 45 (Maria Hristova – Motopista EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 46 (Mariana Markova EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 47 (Mery Ivanova EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 48 (Nelly Stavreva EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 49 (Preslava Becheva EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 50 (Rayna Madzharova – St. Georgi Sofiyski EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 51 (Rumyana Ignatova – Gancheva EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 52 (Sashka Todorova EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 53 (Svetlana Harizanova EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 54 (Svetlana Pirpidonova EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 55 (Ceiba-Blagoevgrad-1 EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 56 (Silvia Veneva EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 57 (Siyana Milanova EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 58 (Stoyanka Radenkova EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 59 (Ana Avdzhieva EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 60 (Radina Bekova EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 61 (Rumen Raynov EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 62 (Hani Modhi EOOD) **	81.34	76.17	01.10.2020
Sopharmacy 63 (SCS Franchise EAD)	81.34	76.17	01.10.2020
Sopharmacy 64 (Sanita Franchising AD) **	81.34	76.17	01.10.2020

* *effective percentage of interest*

** *indirect interest*

<i>Subsidiaries</i>	31.12.2021	31.12.2020	<i>Date of acquisition of control</i>	<i>Date of disposal of control</i>
<i>Companies abroad</i>	<i>Interest %</i>	<i>Interest %</i>		
SIA Briz	-	100.00	10.11.2009	30.12.2021
SOOO Brititrade **	-	80.00	10.11.2009	30.11.2021
PAO Vitamini	100.00	100.00	18.01.2008	
Sopharma Warsaw SP. Z.O.O.	100.00	100.00	23.11.2010	
Sopharma Poland Z.O.O. – in liquidation	60.00	60.00	16.10.2003	
OOO Tabina **	-	80.22	08.04.2011	30.11.2021
OOO Sopharma Ukraine	100.00	100.00	07.08.2012	
OOO Farmacevt Plus **	-	59.08	31.05.2013	30.11.2021
TOO Sopharma Kazakhstan	100.00	100.00	06.11.2014	
OOO Galenapharm**	-	90.60	28.02.2015	30.11.2021
ODO Medjel**	-	82.00	28.02.2015	30.11.2021
ODO Alenpharm-plus**	-	91.98	30.06.2015	30.11.2021
ODO SalusLine**	-	77.00	18.11.2016	30.11.2021

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Rap Pharma International OOD	80.00	80.00	14.04.2017	
ZAO Interpharm **	-	90.00	26.04.2017	30.11.2021
Sopharma Trading d.o.o. (Lekovit d.o.o.)	81.34	76.17	09.08.2017	
OOO Zdorovei**	-	66.85	16.08.2017	30.11.2021
BOOO SpetsAfarmacia **	-	70.00	16.08.2018	30.11.2021
Bellerophon**	-	85.80	07.03.2019	30.11.2021
UAB Recessus	-	50.98	26.09.2019	01.10.2021
OOO Zdorovei Pharm**	-	43.46	02.03.2020	30.11.2021
Pharmachim EOOD	100.00	100.00	14.04.2020	
SIA Briz Trading	-	-	15.02.2021	30.12.2021
SIA BACH **	-	-	02.11.2021	30.11.2021

* *effective percentage of interest*

** *indirect interest*

- “Sopharmacy” EOOD is a subsidiary of “Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharmacy” EOOD;
- “Sopharmacy 2” EOOD is a subsidiary of “Sopharmacy” EOOD whereas the latter holds 100% of the capital of “Sopharmacy 2” EOOD;
- “Sopharmacy 3” EOOD is a subsidiary of “Sopharmacy” EOOD whereas the latter holds 100% of the capital of “Sopharmacy 3” EOOD;
- “Sopharmacy 4” EOOD is a subsidiary of “Sopharmacy” EOOD whereas the latter holds 100% of the capital of “Sopharmacy 4” EOOD;
- “Sopharmacy 5” EOOD is a subsidiary of “Sopharmacy” EOOD whereas the latter holds 100% of the capital of “Sopharmacy 5” EOOD;
- “Sopharmacy 6” EOOD is a subsidiary of “Sopharmacy” EOOD whereas the latter holds 100% of the capital of „Sopharmacy 6“ EOOD;
- “Sopharmacy 7” EOOD is a subsidiary of “Sopharmacy” EOOD whereas the latter holds 100% of the capital of “Sopharmacy 7” EOOD;
- “Sopharmacy 8” EOOD is a subsidiary of “Sopharmacy” EOOD whereas the latter holds 100% of the capital of “Sopharmacy 8” EOOD;
- “Sopharmacy 9” EOOD is a subsidiary of “Sopharmacy” EOOD whereas the latter holds 100% of the capital of “Sopharmacy 9” EOOD;
- “Sopharmacy 10” EOOD is a subsidiary of “Sopharmacy” EOOD whereas the latter holds 100% of the capital of “Sopharmacy 10” EOOD;
- “Sopharmacy 11” EOOD is a subsidiary through “Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharmacy 11” EOOD;
- “Sopharmacy 12” EOOD is a subsidiary through “Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharmacy 12” EOOD;
- “Sopharmacy 13” EOOD is a subsidiary through “Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharmacy 13” EOOD;
- “Sopharmacy 14” EOOD is a subsidiary through “Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharmacy 14” EOOD;

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- “Sopharmacy 15” EOOD is a subsidiary through “Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharmacy 15” EOOD;
- “Sopharmacy 16” EOOD is a subsidiary through “Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharmacy 16” EOOD;
- “Sopharmacy 17” EOOD is a subsidiary through “Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharmacy 17” EOOD;
- “Sopharmacy 18” EOOD is a subsidiary through “Sopharma Trading” AD whereas the latter holds 100% of the capital of “Sopharmacy 18” EOOD;
- Sopharmacy 19 EOOD is a subsidiary through Sopharmacy 61 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 19 EOOD;
- Sopharmacy 20 EOOD is a subsidiary through Sopharmacy 59 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 20 EOOD;
- Sopharmacy 21 EOOD is a subsidiary through Sopharmacy 40 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 21 EOOD;
- Sopharmacy 22 EOOD is a subsidiary through Sopharmacy 59 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 22 EOOD;
- Sopharmacy 23 EOOD is a subsidiary through Sopharmacy 59 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 23 EOOD;
- Sopharmacy 24 EOOD is a subsidiary through Sopharmacy 40 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 24 EOOD;
- Sopharmacy 25 EOOD is a subsidiary through Sopharmacy 40 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 25 EOOD;
- Sopharmacy 26 EOOD is a subsidiary through Sopharmacy 40 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 26 EOOD;
- Sopharmacy 27 EOOD is a subsidiary through Sopharmacy 59 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 27 EOOD;
- Sopharmacy 28 EOOD is a subsidiary through Sopharmacy 60 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 28 EOOD;
- Sopharmacy 29 EOOD is a subsidiary through Sopharmacy 59 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 29 EOOD;
- Sopharmacy 30 EOOD is a subsidiary through Sopharmacy 61 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 30 EOOD;
- Sopharmacy 31 EOOD is a subsidiary through Sopharmacy 60 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 31 EOOD;
- Sopharmacy 32 EOOD is a subsidiary through Sopharmacy 63 EAD whereas the latter holds 100% of the capital of Sopharmacy 32 EOOD;
- Sopharmacy 33 EOOD is a subsidiary through Sopharmacy 61 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 33 EOOD;
- Sopharmacy 34 EOOD is a subsidiary through Sopharmacy 59 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 34 EOOD;
- Sopharmacy 35 EOOD is a subsidiary through Sopharmacy 59 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 35 EOOD;

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- Sopharmacy 36 EOOD is a subsidiary through Sopharmacy 40 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 36 EOOD;
- Sopharmacy 37 EOOD is a subsidiary through Sopharmacy 40 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 37 EOOD;
- Sopharmacy 38 EOOD is a subsidiary through Sopharmacy 40 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 38 EOOD;
- Sopharmacy 39 EOOD is a subsidiary through Sopharmacy 59 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 39 EOOD;
- Sopharmacy 40 EOOD is a subsidiary through Sopharmacy 63 EAD whereas the latter holds 100% of the capital of Sopharmacy 40 EOOD;
- Sopharmacy 41 EOOD is a subsidiary through Sopharmacy 60 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 41 EOOD;
- Sopharmacy 42 EOOD is a subsidiary through Sopharmacy 59 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 42 EOOD;
- Sopharmacy 43 EOOD is a subsidiary through Sopharmacy 40 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 43 EOOD;
- Sopharmacy 44 EOOD is a subsidiary through Sopharmacy 40 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 44 EOOD;
- Sopharmacy 45 EOOD is a subsidiary through Sopharmacy 40 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 45 EOOD;
- Sopharmacy 46 EOOD is a subsidiary through Sopharmacy 59 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 46 EOOD;
- Sopharmacy 47 EOOD is a subsidiary through Sopharmacy 59 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 47 EOOD;
- Sopharmacy 48 EOOD is a subsidiary through Sopharmacy 61 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 48 EOOD;
- Sopharmacy 49 EOOD is a subsidiary through Sopharmacy 40 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 49 EOOD;
- Sopharmacy 50 EOOD is a subsidiary through Sopharmacy 60 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 50 EOOD;
- Sopharmacy 51 EOOD is a subsidiary through Sopharmacy 60 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 51 EOOD;
- Sopharmacy 52 EOOD is a subsidiary through Sopharmacy 59 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 52 EOOD;
- Sopharmacy 53 EOOD is a subsidiary through Sopharmacy 40 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 53 EOOD;
- Sopharmacy 54 EOOD is a subsidiary through Sopharmacy 59 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 54 EOOD;
- Sopharmacy 55 EOOD is a subsidiary through Sopharmacy 60 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 55 EOOD;
- Sopharmacy 56 EOOD is a subsidiary through Sopharmacy 59 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 56 EOOD;

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- Sopharmacy 57 EOOD is a subsidiary through Sopharmacy 59 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 57 EOOD;
- Sopharmacy 58 EOOD is a subsidiary through Sopharmacy 60 EOOD, whereas the latter holds 100% of the capital of Sopharmacy 58 EOOD;
- Sopharmacy 59 EOOD is a subsidiary through Sopharmacy 63 EAD whereas the latter holds 100% of the capital of Sopharmacy 59 EOOD;
- Sopharmacy 60 EOOD is a subsidiary through Sopharmacy 63 EAD whereas the latter holds 100% of the capital of Sopharmacy 60 EOOD;
- Sopharmacy 61 EOOD is a subsidiary through Sopharmacy 63 EAD whereas the latter holds 100% of the capital of Sopharmacy 61 EOOD;
- Sopharmacy 62 EOOD is a subsidiary through Sopharmacy 63 EAD whereas the latter holds 100% of the capital of Sopharmacy 62 EOOD;
- Sopharmacy 63 EAD is a subsidiary through Sopharma Trading AD whereas the latter holds 100% of the capital of Sopharmacy 63 EAD;
- Sopharmacy 64 AD is a subsidiary through Sopharma Trading AD - Sopharma Trading AD owns 100% of the capital of Sopharmacy 64 AD;
- Sopharma Trading D.o.o., Serbia is a subsidiary of Sopharma Trading AD whereas the latter holds 100% of the capital of Sopharma Trading d.o.o.;

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

The parent company holds a permit for production/import of pharmaceuticals No BG/MIA - 0242/1 June 2021, issued by the Bulgarian Drug Agency (BDA).

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

- Sopharma AD – production and trade in medicinal substances (active ingredients) and finished drug forms; research and development activities in the field of medicinal products;
- Sopharma Trading AD – trade in pharmaceutical products;
- Biopharm Engineering AD – production and trade in infusion solutions;
- Pharmalogistica AD – secondary packaging of pharmaceutical products and real estate leases;
- Electroncommerce EOOD – trade, transportation and packaging of radioactive materials and nuclear equipment for medicinal use, household electronics and electrical equipment;
- Phyto Palauzovo AD – production, harvesting, purchase, growing and trade in herbs and medicinal plants;
- Veta Pharma AD – production of medicinal, non-medicinal and other products;
- Sopharmacy EOOD – franchising, know-how, renting of property, trade and other;
- Sopharmacy 2 EOOD – retail trade in medicinal products;
- Sopharmacy 3 EOOD – retail trade in medicinal products;
- Sopharmacy 4 EOOD – retail trade in medicinal products;
- Sopharmacy 5 EOOD – retail trade in medicinal products;
- Sopharmacy 6 EOOD – online and off-line retail trade in medicinal products;

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- Sopharmacy 7 EOOD – retail trade in medicinal products;
- Sopharmacy 8 EOOD – retail trade in medicinal products;
- Sopharmacy 9 EOOD – retail trade in medicinal products;
- Sopharmacy 10 EOOD – retail trade in medicinal products;
- Sopharmacy 11 EOOD – retail trade in medicinal products;
- Sopharmacy 12 EOOD – retail trade in medicinal products;
- Sopharmacy 13 EOOD – retail trade in medicinal products;
- Sopharmacy 14 EOOD – retail trade in medicinal products;
- Sopharmacy 15 EOOD – retail trade in medicinal products;
- Sopharmacy 16 EOOD – retail trade in medicinal products;
- Sopharmacy 17 EOOD – retail trade in medicinal products;
- Sopharmacy 18 EOOD – retail trade in medicinal products;
- Sopharmacy 19 EOOD - retail trade in medicinal products;
- Sopharmacy 20 EOOD - retail trade in medicinal products;
- Sopharmacy 21 EOOD - retail trade in medicinal products;
- Sopharmacy 22 EOOD - retail trade in medicinal products;
- Sopharmacy 23 EOOD - retail trade in medicinal products;
- Sopharmacy 24 EOOD - retail trade in medicinal products;
- Sopharmacy 25 EOOD - retail trade in medicinal products;
- Sopharmacy 26 EOOD - retail trade in medicinal products;
- Sopharmacy 27 EOOD - retail trade in medicinal products;
- Sopharmacy 28 EOOD - retail trade in medicinal products;
- Sopharmacy 29 EOOD - retail trade in medicinal products;
- Sopharmacy 30 EOOD - retail trade in medicinal products;
- Sopharmacy 31 EOOD - retail trade in medicinal products;
- Sopharmacy 32 EOOD - retail trade in medicinal products;
- Sopharmacy 33 EOOD - retail trade in medicinal products;
- Sopharmacy 34 EOOD - retail trade in medicinal products;
- Sopharmacy 35 EOOD - retail trade in medicinal products;
- Sopharmacy 36 EOOD - retail trade in medicinal products;
- Sopharmacy 37 EOOD - retail trade in medicinal products;
- Sopharmacy 38 EOOD - retail trade in medicinal products;
- Sopharmacy 39 EOOD - retail trade in medicinal products;
- Sopharmacy 40 EOOD - retail trade in medicinal products;
- Sopharmacy 41 EOOD - retail trade in medicinal products;
- Sopharmacy 42 EOOD - retail trade in medicinal products;
- Sopharmacy 43 EOOD - retail trade in medicinal products;
- Sopharmacy 44 EOOD - retail trade in medicinal products;
- Sopharmacy 45 EOOD - retail trade in medicinal products;
- Sopharmacy 46 EOOD - retail trade in medicinal products;
- Sopharmacy 47 EOOD - retail trade in medicinal products;
- Sopharmacy 48 EOOD - retail trade in medicinal products;

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- Sopharmacy 49 EOOD - retail trade in medicinal products;
- Sopharmacy 50 EOOD - retail trade in medicinal products;
- Sopharmacy 51 EOOD - retail trade in medicinal products;
- Sopharmacy 52 EOOD - retail trade in medicinal products;
- Sopharmacy 53 EOOD - retail trade in medicinal products;
- Sopharmacy 54 EOOD - retail trade in medicinal products;
- Sopharmacy 55 EOOD - retail trade in medicinal products;
- Sopharmacy 56 EOOD - retail trade in medicinal products;
- Sopharmacy 57 EOOD - retail trade in medicinal products;
- Sopharmacy 58 EOOD - retail trade in medicinal products;
- Sopharmacy 59 EOOD - retail trade in medicinal products;
- Sopharmacy 60 EOOD - retail trade in medicinal products;
- Sopharmacy 61 EOOD - retail trade in medicinal products;
- Sopharmacy 62 EOOD - retail trade in medicinal products;
- Sopharmacy 63 EAD - retail trade in medicinal products, franchising and other services;
- Sopharmacy 64 AD - retail trade in medicinal products, franchising and other services.
- PAO Vitamini, Ukraine – production and trade in pharmaceuticals;
- OOO Sopharma Ukraine, Ukraine – trade in pharmaceuticals and market and public opinion research;
- Sopharma Trading D.o.o. – wholesale trade in medicinal products;
- Sopharma Poland Z.O.O., Poland, in liquidation – market and public opinion research;
- Sopharma Warsaw SP. Z.O.O., Poland – wholesale trade in pharmaceutical and medicinal products and market and public opinion research;
- TOO Sopharma Kazakhstan, Kazakhstan – trade in pharmaceuticals;
- Rap Pharma International OOD, Moldova – trade in pharmaceuticals;
- Pharmachim EOOD, Serbia – consultancy.

OTHER LONG-TERM EQUITY INVESTMENTS

	<i>Country</i>	<i>30.09.2021</i>	<i>Interest</i>	<i>31.12.2020</i>	<i>Interest</i>
		<i>BGN '000</i>	<i>%</i>	<i>BGN '000</i>	<i>%</i>
Traded securities					
Lavena AD	Bulgaria	4,919	13.23	5,024	12.84
Chimimport AD	Bulgaria	548	0.27	310	0.14
Sopharma Buildings REIT	Bulgaria	85	10.25	-	-
Central Cooperative Bank AD	Bulgaria	70	0.06	-	-
Achieve Life Sciences Inc. – USA	USA	23	0.02	23	0.03
Sopharma Imoti REIT	Bulgaria	-	-	4,648	3.78
Olianfarm AD	Latvia	-	-	1,533	0.77

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In case of divergence Bulgarian text should prevail.*

BTF Expat Bulgaria	Bulgaria	-	-	3	0.01
Other		-	-	5	-
		<u>5,645</u>		<u>11,546</u>	
Non-traded securities					
Balkanpharma Razgrad AD	Bulgaria	70	-	70	-
Imventure 1 KDA	Bulgaria	50	1.36	50	1.36
Phytobel OOO	Belarus	-	-	1,381	19.00
Ne Ska OOO	Belarus	-	-	790	19.00
Farmico OOO	Belarus	-	-	172	2.00
ODO DKM-Pharm	Belarus	-	-	100	2.00
OOO Set Aptek	Belarus	-	-	70	2.00
OOO Aptekar - Centr	Belarus	-	-	24	0.00
Other		13	-	91	-
		<u>133</u>		<u>2,748</u>	
Total		<u><u>5,778</u></u>		<u><u>14,294</u></u>	

As at 31 December 2021, within “others” are stated long-term equity investments at the amount of BGN 13 thousand (31 December 2020: BGN 96 thousand) in Group’s non-controlling interest in a total of four companies (31 December 2020: eight companies).

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

	<i>Number of shares</i>	<i>Fair value per share</i>	<i>31.12.2021 BGN '000</i>	<i>Number of shares held</i>	<i>Fair value per share</i>	<i>31.12.2020 BGN '000</i>
<i>Equity investments</i>						
Lavena AD	1,312,102	3.75	4,919	1,273,646	3.94	5,024
Chimimport AD	651,045	0.84	548	329,000	0.94	310
Sopharma Buildings REIT	66,627	7.22	481	-	-	-
Central Cooperative Bank AD	69,934	1.01	70	-	-	-
Achieve Life Sciences Inc. - USA	1,796	12.64	23	1,796	12.91	23
Sopharma Imoti REIT	-	-	-	829,822	5.60	4,648
Olianfarm AD	-	-	-	108,500	14.13	1,533
Aroma AD	-	-	-	2,371	1.84	4
BTF Expat Bulgaria	-	-	-	4,565	14.13	1,533
Industrial Holding Bulgaria AD	-	-	-	1,482	0.83	1
Total			<u><u>5,645</u></u>			<u><u>11,546</u></u>

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

<i>Equity investments</i>	<i>Fair value</i>	<i>(Level 1)</i>	<i>(Level 2)</i>
	<i>31.12.2021</i>		
	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>
"Lavena" AD	4,919	-	4,919
"Chimimport" AD	548	548	-
"Sopharma Buildings" REIT	85	-	85.0
"Central Cooperative Bank" AD	70	70	-
Achieve Life Sciences Inc. - USA	23	23	-
Total	5,645	641	5,004

<i>Equity investments</i>	<i>Fair value</i>	<i>(Level 1)</i>	<i>(Level 2)</i>
	<i>31.12.2020</i>		
	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>
"Lavena" AD	5,024	-	5,024
"Sopharma Imoti" REIT	4,648	4,648	-
"Olainfarm" AD	1,533	1,533	-
"Chimimport" AD	310	310	-
"Achieve Life Sciences" Inc.	23	23	-
"Aroma" AD	4	-	4
BTF "Expat Bulgaria"	3	3	-
"Industrial Holding Bulgaria" AD	1	1	-
Total	11,546	6,518	5,028

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

	<i>Level 1</i>	<i>Level 2</i>	<i>Total</i>
	<i>BGN'000</i>	<i>BGN'000</i>	<i>BGN'000</i>
Balance at 1 January 2020	4,575	4,985	9,560
Purchases	2,620	88	2,708
Sales	(15)	(44)	(59)
Deregistration of capital	(26)	-	(26)
Unrealized gain/(loss), net, included in other comprehensive income (Note 14)	(636)	(1)	(637)
Balance at 31 December 2020	6,518	5,028	11,546
Purchases	22,189	149	22,338
Sales	(2,004)	(36)	(2,040)
Transfer to investments in associates	(25,989)	-	(25,989)

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Transfer to investments in subsidiaries	-	144	144
Unrealized gain/(loss) included in other comprehensive income (Note 14)	(73)	(281)	(354)
Balance at 31 December 2021	641	5,004	5,645

1.34. For issuers - other circumstances, which the Company believes could be relevant for investors in deciding to acquire, sell or continue to hold publicly traded securities:

All circumstances, that the Company considers important for the investors while making the decision to acquire, sell or continue to possess shares are revealed in public, are included in the Preliminary consolidated annual financial statements for 2021.