

Annex № 9

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

And Regulation (EU) 596/2014 of the European Parliament and of the Council of 16 April 2014

- 1.1. No change in the persons controlling the Company.
- 1.6. No opening of bankruptcy proceedings against the company or its subsidiary or any significant events related to production.
- 1.7. No acquisition, use or disposition of high-value assets under art. 114, par. 1, item 1 of POSA
- 1.8. No decision on conclusion, termination and cancellation of joint venture agreements.
- 1.10. Change in the Company's auditors. No change
- 1.30. No initiation or termination of a court or arbitration proceedings relating to claims or liabilities of the company or its subsidiary, with the price of the claim at least 10% of the company's equity.

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

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

Subsidiaries Companies in Bulgaria	Jan-March 2017 Interest %	Jan- March 2016 Interest %	Date of acquisition of control	Date of disposal of control
Sopharma Trading AD*	72.58	72.13	08.06.2006	
Pharmalogistica AD	84.93	78.37	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	40.39	40.75	04.08.2008	
Momina Krepost AD	93.54	92.78	01.01.2008	
Unipharm AD *	77.89	52.06	27.10.2010	
Phyto Palauzovo AD	95.00	95.00	21.09.2012	
	72.58	72.13	19.01.January-	
Sopharmacy EOOD**			March 2016	
	72.58	72.13	05.06.January-	
Sopharmacy 2 EOOD**			March 2016	
	72.58	72.13	02.12.January-	
Sopharmacy 3 EOOD**			March 2016	
Sopharmacy 4 EOOD**	72.58	-	29.02.January-	

			March 2017
	72.58	-	01.03.January-
Sopharmacy 5 EOOD**			March 2017
	72.58	72.13	03.12.January-
Sopharmacy 6 EOOD**			March 2016
	97.96	66.72	26.10.January-
Medica AD			March 2016
	97.96	66.72	26.10.January-
Medica-Zdrave EOOD (in liquidation)**			March 2016
	68.05	-	11.11.January-
Veta Pharma AD			March 2017
* CC* ·			

^{*} efficient percentage of interest

^{**} indirect interest

Subsidiaries Companies abroad	Jan-March 2017 Interest %	Jan- March 2016 Interest %	Date of acquisition of control	Date of disposal of control
SIA Briz	66.13	66.13	10.11.2009	
SOOO Brititrade **	52.90	51.91	10.11.2009	
PAO Vitamini	99.56	99.56	18.01.2008	
	-	51		08.05.Januar
				y-March
Ivančić and Sinovi d.o.o.			10.04.2008	2017
Sopharma Warsaw SP. Z.O.O.	100.00	100.00	23.11.2010	
	72.58	72.13	05.06.January-	
Sopharma Trading d.o.o. Belgrade**			March 2016	
Sopharma Poland Z.O.O. – in liquidation	60.00	60.00	16.10.2003	
	-	66.72		24.03.Januar
			26.10.January-	y-March
Medica Balkans S.R.L. **			March 2016	2017
OOO Tabina **	62.82	58.86	08.04.2011	
SOOO Brizpharm **	46.26	39.41	20.12.2012	
ODO Alean **	62.96	64.81	07.02.2013	
OOO Sopharma Ukraine	100.00	100.00	07.08.2012	
OOO Farmacevt Plus **	42.98	42.98	31.05.2013	
UAB TBS Pharma**	33.73	33.73	01.03.2013	
ODO Vestpharm **	62.96	62.82	04.07.2013	
	-	46.29		05.12.Januar
			02.09.2013	y-March
OOO NPK Biotest **				2017
ODO BelAgroMed **	62.96	50.26	30.07.2013	
TOO Sopharma Kazakhstan	100.00	100.00	06.11.2014	

	48.94	48.14	28.02.January-
OOO Danapharm**			March 2016
	48.94	48.14	28.02.January-
OOO Galenapharm**			March 2016
	48.94	48.14	28.02.January-
ODO Medjel**			March 2016
	48.94	48.14	30.06.January-
ODO Alenpharm-plus**			March 2016
	22.39	33.73	30.11.January-
OOO Farmatea**			March 2016
	48.94	-	16.02.January-
OOO Mobil Line**			March 2017
	48.74	-	18.11.January-
ODO SalusLine**			March 2017

^{*} efficient percentage of interest

- Unipharm AD is a subsidiary to Sopharma AD, the control thereon being acquired and exercised through the direct participation of the parent company in the ownership of Unipharm AD with 77.88%;
- Sopharma Trading AD is a subsidiary of Sopharma AD, the control thereon being acquired and exercised through the direct participation of the parent company in the ownership of Sopharma Trading AD with 72.14% and the indirect participation of the parent company with 0.42% through the subsidiary Medica AD holding 0.43% of the capital of Sopharma Trading AD and 0.02% through the subsidiary Unipharm AD holding 0.03% of the capital of Sopharma Trading AD;
- Sopharma Buildings REIT is a subsidiary by virtue of a written agreement for control concluded between Sopharma AD and other shareholders;
- Phyto Palauzovo is a direct subsidiary after the merger of Bulgarian Rose-Sevtopolis AD into Sopharma AD (as from 1 January January-March 2016);
- 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;

^{**} indirect interest

- 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 Sopharmacy 7 EOOD;
- Sopharma Trading d.o.o. Belgrade is a subsidiary of Sopharma Trading AD whereas the latter holds 100% of the capital of Sopharma Trading d.o.o. Belgrade;
- Medica-Zdrave EOOD (in liquidation) is a subsidiary of Medica AD whereas the latter holds 100% of the capital of Medica-Zdrave EOOD;
- SOOO Brititrade, Belarus, is a subsidiary of SIA Briz, Latvia, whereas the latter holds 80% of the capital of SOOO Brititrade;
- OOO Tabina, Belarus, is a subsidiary through SIA Briz, Latvia, whereas the latter holds 95% of the capital of OOO Tabina;
- SOOO Brizpharm, Belarus, is a subsidiary through SIA Briz, Latvia and its subsidiary OOO
 Pharmacevt plus, Belarus SIA Briz holds 37.27% of the capital of SOOO Brizpharm and
 OOO Pharmacevt Plus 49.98% of the capital of SOOO Brizpharm;
- ODO Alean, Belarus, is a subsidiary through Briz, Latvia, and its subsidiary SOOO Brititrade, Belarus, whereas SIA Briz holds 76% and SOOO Brititrade holds 24% of the capital of ODO Alean;
- OOO Farmacevt Plus, Belarus, is a subsidiary through SIA Briz, Latvia, whereas the latter holds 65% of the capital of OOO Farmacevt Plus;
- UAB TBS Pharma, Lithuania, is a subsidiary through SIA Briz, Latvia, whereas the latter holds 51% of the capital of UAB TBS Pharma;
- ODO Vestpharm, Belarus, is a subsidiary through SIA Briz, Latvia, and its subsidiary SOOO
 Brititrade, Belarus, whereas SIA Briz holds 76% and SOOO Brititrade holds 24% of the
 capital of ODO Vestpharm;
- ODO BelAgroMed, Belarus, is a subsidiary through SIA Briz, Latvia, and its subsidiary SOOO Brititrade, Belarus, whereas SIA Briz holds 76% and SOOO Brititrade holds 24% of the capital of ODO BelAgroMed;
- ODO Danapharm, Belarus, is a subsidiary through SIA Briz, Latvia, and its subsidiary SOOO
 Brititrade, Belarus, whereas SIA Briz holds 10% and SOOO Brititrade holds 80% of the
 capital of ODO Danapharm;
- ODO Galenapharm, Belarus, is a subsidiary through SIA Briz, Latvia, and its subsidiary SOOO Brititrade, Belarus, whereas SIA Briz holds 10% and SOOO Brititrade holds 80% of the capital of ODO Galenapharm;
- ODO Medjel, Belarus, is a subsidiary through SIA Briz, Latvia, and its subsidiary SOOO
 Brititrade, Belarus, whereas SIA Briz holds 10% and SOOO Brititrade holds 80% of the
 capital of ODO Medjel;

- ODO Alenpharm-plus, Belarus, is a subsidiary through SIA Briz, Latvia, and its subsidiary SOOO Brititrade, Belarus, whereas SIA Briz holds 10% and SOOO Brititrade holds 80% of the capital of ODO Alenpharm-plus;
- ODO Farmatea, Belarus, is a subsidiary through SIA Briz, Latvia, and its subsidiary OOO
 Farmacevt Plus, Belarus, whereas SIA Briz holds 2% and OOO Farmacevt Plus holds 49% of
 the capital of ODO Farmatea;
- ODO Mobil Line, Belarus, is a subsidiary through SIA Briz, Latvia, and its subsidiary SOOO
 Brititrade, Belarus, whereas SIA Briz holds 10% and SOOO Brititrade holds 80% of the
 capital of ODO Mobil Line;
- ODO SalusLine, Belarus, is a subsidiary through SIA Briz, Latvia, and its subsidiary SOOO
 Brititrade, Belarus, and its subsidiary ODO Alenpharm-plus, Belarus, whereas SIA Briz holds
 10%, SOOO Brititrade holds 75% and ODO Alenpharm-plus holds 5% of the capital of ODO
 SalusLine.

AVAILABLE-FOR-SALE INVESTMENTS

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

	<i>C</i> 4	Jan-March 2017	Interes	I M	Interes	
	Country		t	Jan-March 2016	t	
		BGN '000	%	BGN '000	%	
Lavena AD	Bulgaria	2,890	11.32	2,883	11.29	
Olainfarm AD	Latvia	1,780	0.77	1,796	0.77	
Achieve Life Siences Inc.	USA	290	4.70	290	5.00	
OOO Pharmico	Belarus	172	2.00	172	2.00	
Hydroizomat AD	Bulgaria	131	10.67	131	10.65	
ODO DKM-Pharm	Belarus	100	2.00	100	2.00	
Sopharma Properties REIT	Bulgaria	80	0.07	64	0.07	
OOO Set Aptek	Belarus	70	2.00	70	2.00	
Todorov AD	Bulgaria	58	4.98	37	4.98	
BTF Expat Bulgaria	Bulgaria	-	-	82	0.32	
Other		97		96		
Total		5,668		5,721		

The other available-for-sale investments as at 31 March 2017, amounting to BGN 97 thousand (31 December 2016: BGN 96 thousand), include a number of minority interests of the Group in the capital of five companies (31 December 2016: five companies).

The investments in Achieve Life Science Inc., USA and all other companies in Belarus are valued and presented in the consolidated financial statements at acquisition cost.

1.34. Other circumstances which the company believes could be relevant for investors in deciding to acquire, sell or continue to hold publicly traded securities:

All circumstances, that the company considers important for the investors while making the decision to acquire, sell or continue to possess shares are revealed in public, are included in the consolidated statement for the first quarter of 2017.