

## Corporate Governance

### DECLARATION

*under Article 40 of the Accounting Act and article 100m, paragraph 8 of the LPOS*

### SOPHARMA GROUP

*The undersigned Ognian Ivanov Donev, in his capacity as CEO of "Sopharma" AD, declares the following:*

#### **I. Information on compliance, as appropriate, with the Bulgarian Corporate Governance Code prepared by the National Corporate Governance Commission (NCGC), approved by the Vice-President of the Financial Supervision Commission and the corporate governance practices applied by companies in Sopharma Group in addition to the code.**

The public companies in Sopharma Group have adopted and continue to respect the established in October 2007, with subsequent amendments in 2012 and 2016, National Corporate Governance Code /NCGC/, approved by the deputy chairman of the Financial Supervision Commission.

The good corporate governance is a set of well-balanced relationships between management bodies of the public companies in the Group, its shareholders and all stakeholders - employees, business partners, creditors of the company, and potential future investors and the general public.

Along with the principles bearing recommendatory nature, Sopharma Group establishes a set of requirements for good corporate governance practices, the observance of which is mandatory for their governing bodies and which relate to:

- Protecting the rights of shareholders;
- Ensuring fair treatment of all shareholders, regardless of the number of shares held by them;
- Recognition of the rights of interested parties and promote cooperation between the public company and stakeholders;
- Providing timely and accurate disclosure of information on all matters related to the public companies in the Group, including financial position, performance, ownership and the management of the companies;
- Supporting the strategic management of the companies, control over the activities of the management and their accountability to the public companies in the Group and shareholders.

The Corporate Governance Code applies the principle "**comply or explain**". That means that its recommendations are followed and whether there is a deviation from them or not, the management of the public companies in the Group periodically disclose information on corporate governance to the type and extent, provided in NCGC, namely:

- The actions of their managements are in the direction of strengthening the principles of good corporate governance, enhancing the confidence of shareholders, investors and those interested in the management and operations of the public companies in the Group.
- The managements of the public companies in the Group complies with Program for corporate governance, which is consistent with existing regulations, internationally

recognized standards of good corporate governance and the National Corporate Governance Code.

- The managements of the public companies in the Group approve Policy on disclosure of information in accordance with the legal requirements and statutes.

"Sopharma" AD is involved in the formation of the Association "National Committee on Corporate Governance."

## **1. PARENT COMPANY MANAGEMENT /"SOPHARMA" AD/- BOARD OF DIRECTORS**

### **1.1. Functions and duties**

The Board of Directors of "Sopharma" AD manages independently and responsibly the Company in accordance with the established vision, goals and strategies of the Company and shareholders' interests. The Members of the Board of Directors give guarantee for their management in the amount of their quarterly gross remuneration.

During its mandate the Board of Directors shall be guided in its activities by the generally accepted principles of integrity, management and professional competence. The Board of Directors observes the Ethical code of conduct for the employees of the Company adopted by a protocol of the Board of Directors of 26.03.2007.

The management of "Sopharma" AD, represented by the Board of Directors also:

- monitors the results of the Parent Company and the Group and, if necessary, initiate changes in the management;
- treats equally all shareholders, acts in their own interest and with due diligence;
- provides and controls the integrated functioning of the accounting and financial reporting;
- is responsible for the establishment and proper functioning of the financial information system of the Parent Company and the Group.
- gives guidelines, approves and controls the implementation of the business plan of the Parent Company and the Group, material transactions and etc.
- reports on its activities to the General meeting of shareholders, by preparing an Annual report on its activities and submitting it for adoption by the GMS.

### **1.2. Appointment and dismissal of members of the Board of Directors**

The General meeting of shareholders elects and dismisses the members of the Board of Directors of "Sopharma" AD, according to the law and the Statute of the Company, subject to the principles of continuity and sustainability of the work. All members meet the legal requirements for taking up the respective position.

By proposals for election of new members of the Board of Directors, they shall comply with the principles of compliance competence of candidates to the character of the Parent Company's activities and the Group.

### **1.3. Structure and competence**

The number of members and the structure of the Board of Directors are set out in the Statute, as it is managed and represented by a Board of Directors, which consists of five individuals, meeting the requirements of Article 234 of the Commercial Code and Article 116a, paragraph 2 of the Law on public offering of securities.

The members chosen by the General Meeting Board of Directors is structured in a way that ensures professionalism, impartiality and independence of decisions and actions of its members in the management of the Group.

The Board of Directors ensures a proper division of tasks and duties among its members. The main functions of the members of the Board of Directors and the number of independent members is laid down in the Statute of the Company. Independent directors control the actions of the executive management and participate effectively in the work of the Company in accordance with the interests and rights of the shareholders. In the Board of Directors of "Sopharma" AD the independent members are two.

The competencies, rights and obligations of the members of the Board of Directors follow the requirements of the law, Statute and standards of good professional and managerial practice.

The Members of the Board of Directors of "Sopharma" AD have appropriate knowledge and experience, corresponding to the position they take. After their election, the new members of the Board of Directors should be introduced to fundamental legal and financial issues related to the Group. The company promotes training of members of the Board of Directors.

The election of the members of the Board of Directors of the Parent Company is through a transparent procedure which should ensure timely and sufficient information on the personal and professional qualities of the candidates. The number of consecutive mandates of the Board of Directors ensures efficient operation of the Parent Company and compliance with the legal requirements. According to the Statute of the Parent Company, the members of the Board of Directors may be re-elected without limitation.

#### **1.4. Remuneration of the Board of Directors**

The management bodies of all public companies in the Group have prepared and applied a Policy for the formation of their remuneration, which is adopted by the General meeting of shareholders. Remuneration policies were developed in accordance with Ordinance № 48 of 20 March 2013 of the Financial Supervision Commission and the Law on public offering of securities. The size and structure of remuneration shall be determined by the General meeting of shareholders.

In accordance with legal requirements and best practice of corporate governance, the size and structure of the remuneration account:

- The responsibilities and contributions of each member of the management bodies on the activities and results of the respective company. The members of the management bodies receive a fixed remuneration as determined by the General meeting of shareholders amount paid under the terms and conditions of agreements concluded between them and the Company management contracts.
- The ability to select and retain qualified and loyal members of the management bodies.
- The necessity for conformity to the interests of the members of the management bodies and long-term interests of the companies. The remuneration of the members is formed on the basis of the results of the company and are consistent with the business strategy, objectives, values and long-term interests of the Group.
- The Executive member of the Board of Directors receives fixed remuneration as determined by the General meeting of shareholders, amount paid under the terms and conditions of the signed management contract between him and the company.

- The remuneration and bonuses of the members of the management bodies and the Executive Director of the company must be approved by the General meeting of shareholders.
- The remuneration of the independent directors is only basically without additional incentives and reflects their participation in meetings as well as the fulfillment of their tasks to control the actions of the executive management and to participate effectively in the company's work.

Until now, the executive members have not been provided with shares, options on shares or other financial instruments.

With the qualified majority, the management bodies may take a decision to determine the circle of employees, among which may be distributed as bonus cash amount to 2% of the profit of the Parent Company for each financial year. The same is possible only if there is a decision of the General meeting of shareholders to determine the specific amount of the bonus amount taken at a meeting, which approved the corresponding Audited annual financial statements and there is a positive financial result /profit/.

The disclosure of the information about the remuneration of the Board of Directors is in accordance with legal regulations and the Statutes of the public companies of the Group and the Parent Company.

Shareholders have easy access to the adopted company policy for determining the remunerations and bonuses of the Board members as well as information on their annual remuneration and additional incentives. The remuneration of the members of the Board of Directors is presented in the Annual financial statements in the Report on the implementation of the remuneration policy of the Board of Directors and is published on the websites of the companies.

### **1.5. Conflict of interests**

The members of the management bodies shall endeavor to avoid and prevent real or potential conflict of interests.

The procedures for preventing and disclosing conflicts of interest are regulated by the Statutes of the companies and internal documents and rules.

The members of the management bodies shall endeavor to disclose immediately conflicts of interest and provide the shareholders with access to information about transactions between the companies and the members of the management bodies or related parties.

Any conflict of interests is disclosed to the management bodies.

Potential conflict of interests exists when the company intends to carry out a transaction with a legal entity in which the member of the management bodies or related (interested) parties thereto have a financial interest.

In Article 114 of the Law on public offering of securities describes in detail the situations in which the persons who managing and representing a public company, including the representatives of legal person that is a member of the public company's management body, without being expressly empowered by the General meeting of the public company, may not carry out certain transactions. Article 114 of the Law on public offering of securities and the following provide an opportunity for shareholders to review and approve in advance transactions with the participation of interested parties and related parties in order to avoid conflicts of interest and violation of shareholders' rights.

## **1.6. Committees**

The work of the management bodies is assisted by committees as the necessity for their settlement is determined by the management body pursuant to the specificity of the company.

In accordance with the requirements of the applicable law and on the basis of the criteria it sets, the management body proposes to the General meeting of shareholders to elect an audit committee in stock that complies with the legal requirements and the particular needs of the company.

The Committees are created on the basis of written structure, scope of tasks, operation and reporting procedures. The Audit Committee of "Sopharma" AD consists of three people with three-year mandate determined by the General meeting of shareholders. The members of the Audit Committee meet the requirements of the Independent financial audit Act.

## **2. INDEPENDENT FINANCIAL AUDIT AND INTERNAL CONTROL**

The Audit Committee of "Sopharma" AD and its members, in their capacity as persons charged with governance, oversee the internal audit activities and monitor the overall relationship with the external auditor, including the nature of the non-audit services provided by the auditor of the Group.

The management of the "Sopharma" AD, assisted by the Audit Committee, motivates in writing to the General Meeting its proposal for selection of an auditor, guided by the established professionalism requirements.

The managements of the companies in the Sopharma Group ensures compliance with the applicable law with respect to independent financial audit and the public companies moreover apply the provisions of special laws.

The principle of rotation is applied in the selection and the appointment of an external auditor. The auditors are elected by the GMS for each financial year.

The companies of Sopharma Group have established an internal control system that identifies risks associated with their operation and supports their effective management. It ensures the effective functioning of the systems for reporting and disclosure of information and its complexity is defined by the specificity of the company's activity.

## **3. PROTECTION OF SHAREHOLDERS**

The managements of the public companies in the Sopharma Group, ensure equal treatment of all shareholders, including minority and foreign shareholders, protecting their rights and facilitating their implementation within the limits allowed by the current legislation and in accordance with the provisions of the companies' Statutes. The management bodies provide information to all shareholders about their rights.

### **3.1. General meeting of shareholders**

At the disposal of all shareholders is information about the rules under which the General meetings of shareholders are convened and held, including voting procedures. The managements of the public companies in the Sopharma Group provide sufficient and timely information concerning the date and venue of the meetings, as well as full information on the matters to be discussed and decided at the meetings.

All shareholders are entitled to participate in the General meeting of shareholders and to express their opinion, as well as to ask questions:

- Shareholders entitled to vote are eligible to exercise their right at the General Meeting of the public companies in person or by proxy, as well as by correspondence or by electronic means. The order of participation of the shareholders in the General meeting is announced in the Invitation.

- The management performs effective control by creating the necessary organization to vote on the authorized persons in accordance with the instructions of the shareholders or authorized by the law.

- The management organizes and conducts regular and extraordinary General meetings of shareholders of the company in accordance with statutory procedures, ensuring equal treatment of all shareholders and the right of each shareholder to express its views on the items on the agenda of the General meeting.

- The management organizes the procedures and conditions for holding the General meeting of shareholders in a manner that does not impede or unnecessarily expensive the vote.

- The management takes action to encourage the participation of the shareholders at the General meeting of shareholders, incl. by providing opportunities for telepresence by technical means (incl. Internet) where this is possible and necessary, and does not contradict the NCGC.

- The managements of the public companies in Sopharma Group believe that prerequisites have been created for sufficient transparency in investor relations, financial media and capital market analysts.

- The processes and procedures for holding General meetings of Shareholders guarantee equal treatment of all shareholders, including minority and foreign shareholders, and protect their interests.

All members of the managements are trying to attend the General meetings of shareholders of the companies.

### **3.2. Materials for the General meeting of shareholders**

The materials related to the General meeting of shareholders are available to the shareholders from the day of the announcement of the invitation for its convening in the Commercial Register. They shall be submitted to the Financial Supervision Commission and published on the company's website and in the relevant media at least 30 days before the date of the General meeting and shall be provided free of charge to the shareholders upon request.

The text in the written materials related to the agenda of the General meeting are specific and clear and do not mislead. All proposals regarding major corporate events are presented as separate items on the agenda of the General meeting, including proposal for profit distribution.

The public companies in Sopharma Group maintain on their websites a special section on the rights of shareholders and their participation in the General meeting of shareholders.

The managements of the public companies in Sopharma Group assist shareholders, entitled under current law to include additional items and to propose decisions on already included items in the agenda of the General meeting.

### **3.3. The managements of the public companies in the Group guarantee the right of shareholders to be informed about the decisions of the General meeting of shareholders.**

The minutes of the General meetings of shareholders are published within the statutory period, observing the provisions on the requirements for maximum publicity and transparency of the information provided, its simultaneous publication, using sufficiently accessible information disclosure platforms, including the company's own websites. All materials from the held General meetings of shareholders are kept available to shareholders and all interested parties for a period specified in the Law on public offering of securities.

In 2020 the public companies of Sopharma Group held General meetings of shareholders as follows: “Sopharma” AD held three GMS, “Sopharma Trading” AD held two GMS, “Momina Krepost” AD held two GMS, “Sopharma Buildings” REIT held two GMS and “Doverie-obedinen holding” AD held two GMS.

The Board of Directors believes that they have created prerequisites for sufficient transparency in relationships with investors, financial analysts, media and the capital market.

### **3.4. Uniform treatment of the shareholders of one class**

All shareholders of the same class are treated equally.

All shares within a class give equal rights to the shareholders of the same class.

### **3.5. The managements of the public companies in the Group ensure that sufficient information to investors about the rights attaching to the shares of each class prior to their acquisition.**

### **3.6. Consultations between shareholders on major shareholder rights**

Within the limits permitted by the applicable law and in accordance with the Statutes of the companies in the Group, the managements of the public companies in Sopharma Group do not prevent shareholders from consulting each other on issues related to their basic shareholder rights in a way that does not allow committing abuses.

### **3.7. Transactions of shareholders with control rights and transactions of abuse**

The managements of the public companies in Sopharma Group do not allow carrying out transactions with shareholders with control rights that violate the rights and/or legitimate interests of other shareholders, including the terms negotiated with itself.

### **3.8. Remuneration policy**

The management bodies of the public companies in the Group prepare a Report on the implementation of the remuneration policy of the members of the Management bodies in 2020. The report reveals how the remuneration policy is applied, paying particular attention to avoiding the creation of incentives for excessive risk-taking, conflicts of interests or other behavior that leads to adverse consequences. The size and structure of the remuneration shall be determined by the General meeting of the company.



#### 4. DISCLOSURE OF INFORMATION

The managements of the public companies in the Sopharma Group approved Policy on disclosure of information in accordance with legal requirements and regulations.

In accordance with the adopted Policy of disclosure the managements establish and maintain a system of disclosure.

The Policy on disclosure ensures equal access to information (shareholders, stakeholders, investment community) and prevents misuse of inside information and manipulation of the market of financial instruments.

The managements of the public companies in Sopharma Group also:

- ensure that the system of disclosure provides complete, timely, accurate and understandable information that enables objective and informed decisions and assessments;
- timely disclose the capital structure of the companies and the agreements that lead to exercise of control, according to its rules for disclosure of information;
- in accordance with the current legislation and the Statutes of the companies, ensure that the rules and procedures under which the acquisition of corporate control and extraordinary transactions such as mergers and sales of substantial portions of the assets are made, are clearly and timely disclosed;
- approve and monitor compliance with internal rules for the preparation of annual and interim statements and procedures for disclosure of information;
- have adopted internal rules that provide timely disclosure of any significant periodic and incidental information about the companies, their management, corporate manuals, operational activities, shareholding structure.

As a part of the disclosure system, Sopharma Group maintains a website of the company with established content, scope and frequency of information disclosed, which is: [www.sopharmagroup.com](http://www.sopharmagroup.com)

The information disclosed by the company website includes:

- basic identifying the Group's commercial and corporate information;
- up-to-date information on shareholding structure of the Parent Company;
- the rules and adopted policies related to the activities and functioning of the Group;
- information about the structure and composition of the management bodies of the Parent Company, as well as basic information about their members, including information about committees;
- financial statements for the last 10 years;
- materials for the upcoming General meetings of shareholders of "Sopharma" AD, as well as additional ones received by law;
- information on decisions of General meetings of shareholders at least the last three years incl. information on dividends distributed by the Group for that period;
- information about the auditors;
- information about upcoming events;
- information on issued shares and other financial instruments;
- important information related to the Group;
- information about shareholder rights including sufficient information on the right of shareholders to request inclusion of items and propose decisions on already included in the agenda of the General meeting under article 223a of the Commercial Code;
- information for contacts with the Director of Investor Relations of "Sopharma" AD.



The Group maintains a foreign language version of the corporate website with similar content in the following languages: English, Russian and Polish.

The Group periodically discloses information about Corporate governance. Disclosure of Corporate governance information is carried out in accordance with the principle "comply or explain".

The managements of the public companies in the Sopharma Group provide disclosure of any significant periodic and incidental information about the Group, through channels that provide equal and timely access to relevant information by users.

In 2020, the public companies in the Group disclose publicly regulated information and other information by providing it to the Financial Supervision Commission and the public. Regulated information is disclosed to the public in a way that ensures that it reaches the widest possible range of people at the same time and in a way that does not discriminate them. This is done through the information systems X3NEWS and Investor.bg, as well as for the Parent Company of the Warsaw Stock Exchange, including through the Polish Press Agency (PAP).

## **5. STAKEHOLDERS**

The managements provide effective interaction with stakeholders. This category includes certain groups of persons to whom the Group directly affects and which in turn could affect their activities, including suppliers, customers, employees, creditors, civil society groups and others. The companies in the Group identify who are the stakeholders with respect to their activities based on their degree of influence, role and relationship to sustainable development.

In their Policy for disclosure of information to stakeholders, the managements comply with legal requirements and principles of transparency, accountability and business ethics.

The managements of the companies ensure sufficient awareness of all stakeholders about their statutory rights.

In accordance with this policy, the managements of the companies in the Group have developed specific rules for addressing stakeholder interests, that rules should ensure their involvement in solving specific issues, that require their input. These rules ensure balance between the development of the Group's economic, social and ecological environment in which it operates.

The managements of the companies in the Sopharma Group maintain effective relationships with stakeholders. Periodically, in accordance with legal norms and international best practice for disclosure of non-financial information, the Group informs the stakeholders about the economic, social and environmental related issues, such as: combating corruption; working with employees, suppliers and customers; corporate social responsibility of the Group; environmental protection.

The managements of the companies in the Sopharma Group guarantee the right for timely access to relevant, sufficient and reliable information on the companies in the Group when stakeholders involved in corporate governance.

**II. Explanation which parts of the Code of Corporate Governance under p. 1, letter "a" or "b" of art. 100 "m" par. 8 are not complied with and the reasons for it accordingly when the issuer has decided not to invoke any of the rules of Corporate governance code – warranted.**

The public companies in the Sopharma Group comply with all parts of the Corporate governance code under p. 1, letter "a".

**III. Description of the main features of the internal control and risk management of the issuer in relation to the financial reporting process.**

The internal control system of financial reporting and accounting in the companies of Sopharma Group has been developed as a result of good reporting and control practices in Bulgaria and large pharmaceutical groups as well as in compliance with the national legal requirements, including listed on regulated markets companies and groups. It is in constant process of monitoring by management and of further elaboration and improvement. Most of the parameters to be provided in this document are from the practices of the companies with the most developed internal control systems, namely "Sopharma" AD and "Sopharma Trading" AD.

The internal control systems of financial reporting and accounting of the companies in the Group are a complex of behavioral and technical principles, rules, procedures and control activities, which are specially developed and adapted to the specifics of the companies, their activities and reporting system. They are aimed at:

- providing ongoing monitoring and reporting activities targeted towards the Group objectives, the expectations of its various users and the achievement of the necessary efficiency and effectiveness, incl. the use of resources employed; and
- ensuring adequate and timely address the identified business risks that have an impact on the financial, management and operational reporting.

In particular, it is developed in a way that create comfort leadership that:

- the companies in the Group comply with applicable legal requirements in accounting, reporting and other directly related fields, particularly the requirements of the Accounting Act and International Financial Reporting Standards;
- the Group complies with the instructions and guidance to senior management regarding the reporting and documentation;
- there is the required effectiveness and efficiency of the financial accounting process, incl. consolidation and documentary justification;
- there is a high degree of security protection and maintenance of the Group companies' assets, incl. and prevention of fraud and error; and
- there is provision of reliable, quality and timely financial and operational information for internal and external users.

The main components of the internal control system on financial reporting and accountability include:

- a) acceptance and observance of ethical principles and rules of conduct, adopted in a Code of Ethics of employees in the companies of the Sopharma Group and in terms of financial reporting and accounting and all related processes, procedures and actions of all personnel of the company;

b) developing and defining the optimal structure of the units involved in the processes related to financial reporting, with clearly defined responsibilities and delegation powers and duties, incl. by developing written internal documents;

c) developing policies for recruitment, training and development of personnel in the processes of accounting and financial reporting;

d) developing and maintaining control procedures and rules for each stage of the process relating to accounting, financial reporting and accountability priority gradual introduction of formalized written procedures;

e) developing procedures for identifying, monitoring and managing risks relating to accounting, financial reporting and accountability, incl. development of adequate measures and actions for their minimization; and

f) developing and maintaining adequate organization of information system incl. access controls, input, processing and retrieval of data, system changes, allocation of responsibilities of employees in her party, as well as storage and preservation of the integrity and authenticity of data in the system.

### ***Control environment***

*Ethical principles and rules related to the processes of accounting, financial reporting and accountability*

The managements of different levels of the companies in Group have implemented and continuously monitor compliance with ethical values such as integrity, independence and objectivity as foundations of professional conduct of all persons involved in the processes related to accounting and financial reporting in the Group. It is the framework against which the control environment was built, and which have influenced the effectiveness of the design model, administration and ongoing monitoring of other components of internal control in the field of accounting and financial reporting. Integrity and ethical behavior are the product of established common ethical and behavioral standards of the companies in the Group. They are clearly communicated to the entire financial accounting and control personnel and they constantly affirm in practice.

Ethical principles governing the professional conduct that should be observed by all persons involved directly or indirectly in accounting and business processes and related financial reporting are: objectivity; impartiality; independence; conservatism; transparency; methodological soundness; sequence and the use of independent experts. These principles are applied to all stages of financial reporting in: accounting policy choice; closing of accounts; design and implementation of accounting estimates and develop public and government financial statements of other public reports and documents containing financial information.

*Management bodies responsible for different components of the overall process of accounting and financial reporting*

Management bodies which carry certain responsibilities and powers regarding the financial reporting process and respectively other related process are different in the different companies in the Group. For the whole Group they are: Board of Directors, Audit Committee, Chief Financial Officer, Chief Accountant, Head of "Reporting" and Head of "Internal Audit" of the Parent Company "Sopharma" AD.

Their functions and responsibilities can be summarized as follows:

- The Board of Directors accepts and affirms: accounting policies and changes thereto for each reporting period, developing accounting estimates at the date of each reporting period, incl. methodologies; financial statements and reports and other public documents containing financial information; functions, organization and responsibilities of all departments and their leaders involved in processes and associated financial reporting; development, deployment and ongoing monitoring functioning of the various components of the internal control system, incl. activities of the department "Internal Audit";
- The Audit Committee independently monitors the implementation of the financial reporting processes, accounting policies and the effectiveness of the internal control system of the company, incl. risk management, as well as the implementation and results of the external and internal audit;
- The CFO is responsible for the overall organization, operation and monitoring of accounting and financial reporting. He directly manages the entire process takes all key decisions related to the financial statements and other public documents with financial information. He also approves the first level accounting policy, the main accounting methods and evaluates and approves the reports of independent experts (appraisers, actuaries, consultants and others) involved in the financial reporting process. He currently monitors, along with the chief accountant and head of the department "Reporting" effects and risks on the financial statements of the identified business risks for the company;
- The Chief accountant organizes and manages the accounting and reporting of the company - controls and methodological manages current accounting, manages the preparation of financial and management reports; is responsible for development and implementation of accounting and reporting methods and techniques; is responsible for the process of closing of accounts and preparation of all accounting estimates, offers and develops accounting policies and changes in them, monitors ongoing changes to IFRS. He is the direct contact with internal and external experts for financial reporting purposes;
- The department "Reporting" and its head carries overall organization, providing methodological and implementation process related to the preparation of the consolidated financial statements of the company, incl. current control, instruction, monitoring and analysis of financial statements for purposes of consolidation of the companies of Sopharma Group;
- "Internal audit" performs subsequent control over the operations and activities related to the preparation of the financial statements of the Company and compliance with the internal controls put in place by individual routine and non-routine processes.

#### *Policies and practices related to human resources in financial and accounting departments*

The companies in the Group have established policies and rules, related to the management of human resources in the financial reporting process and other processes associated with it. These include enforced and implemented policies and procedures for the selection and appointment of staff aimed at education and work experience, computer literacy and possession of languages of candidates when selecting leading requirements set out in the job descriptions of individual positions.

To the policies for personnel management are included those related to continuous further professional training, upgrading and expansion of knowledge and skills of employed specialists. In case of changes in the legacy, IFRS, tax and other laws affecting their work directly, the employees must attend different kind of trainings. The purpose of this policy is to achieve an increase in their expertise and improve their skills to increase efficiency in the performance of their duties.

### *Processes in the Group to assess the risk associated with financial reporting*

The Board of Directors, the Audit Committee, the Finance Director and the Chief Accountant of the Group's public companies have a key role in permanently identifying, monitoring and controlling business risks, incl. to identify and control the effects of those that have a direct impact on individual processes and areas of accounting, financial reporting and accounting of the companies. They, together, provide overall monitoring of the process of risk management.

Risk factors related to reliable financial reporting include external and internal events, transactions or circumstances that may arise and reflect negatively on the entity's ability to create, maintain and process accounting and operational data in a way that ensures reliable financial reporting, records and reports. In summary, the following factors are defined as the main in the Group:

a) as external risks are determined: change in the business environment and market environment of the companies and their major products; the activities of competitors; changes in legal and regulatory framework; changes in key suppliers or customers; fraudulent or malicious actions by outsiders; rapid corporate growth and growth of the group; development of the companies in which they hold significant investments in the form of shares and/or loans.

b) to internal risks are assigned: change the technological base of the companies, the manner and intensity of use of their assets and resources; new products and activities; new accounting policies and IFRS; changes in the personnel of the departments responsible for and/or financial reporting; changes in information systems; mistakes at work and/or insufficient knowledge or skills of staff rapidly expanding business abroad; administration of multiple estimates - especially use of fair values and calculating the recoverable amount of certain non-current assets, with the participation of external experts.

Risk factors that are repetitive and/or are related to the application of accounting policies and estimates are currently monitored by the chief accountant of the Group, who offers solutions for the management and proper coverage of their effects in the financial statements. The new risk factors are identified by the CFO of the Parent Company and they are evaluated and developed together with the Chief accountant and Head of the department "Reporting." If necessary, technical assistance of independent consultants is used, incl. and implementation of new IFRSs. The general supervision of the process of managing the risks associated with financial reporting is carried out by the Audit Committee of the company.

### *Information system of the companies in the Group. Department "Accounting" - organization of the accounting function in the company and the financial reporting process*

#### *Information System*

The information system of the "Sopharma" AD includes infrastructure (physical and hardware components), software, people, procedures and data. In 2013 the Company has implements ERP system Microsoft Dynamics AX. It covers all processes in sales, warehouse, mainly planning, production and accounting. The system was adapted and implemented not only by taking into account the specifics of the Company itself but also are borrowed best practices from the pharmaceutical sector and other manufacturing industries.

Besides the main information system, the Company uses the following systems: Hermes - a system of human resource management that covers the entire management cycle associated with the planning, evaluation, remuneration and human capital development in "Sopharma" AD. The relationship between them is that they enter data from Hermes into Microsoft Dynamics AX. The quality of information generated by the system Microsoft Dynamics AX and other products

provide significant opportunities for management to take adequate, reasonable and timely decisions in managing and controlling activities on the preparation of various financial and management reports and other public documents with financial information.

The information system of "Sopharma Trading" AD includes infrastructure (physical and hardware components), software, people, procedures and data. The Company started in 2014 the phased implementation of SAP ERP system. It covers all major transaction processes in the Company. The system is adapted and implemented, taking into account the specifics of the Company itself, but also good practices from the pharmaceutical sector and other production branches are borrowed.

In addition to the main information system, the following systems are also used in the Company: FM + Transportation Planning and Management, Mobile Driving Management Application (on SAP Mobile Platform), KNAPP WMS and SAP WMS - Warehouse Management, SAP Hybris - Online Sales Management, Hermes - HR management. The relationship between them is accomplished through interfaces. The quality of information generated by the SAP ERP system and other products provides significant opportunities for management to make adequate, reasoned and timely decisions in managing and controlling the preparation of various financial and management reports as well as other public documents with financial information. Given the smaller scale of operations of the other companies in the Group, each of them uses software that is in line with its needs. The information system, relevant to the purpose and process of the financial reporting, includes, methods and documentation, which:

- identify and reflect all valid transactions and operations;
- timely describe the transactions and operations in sufficient detail to allow their appropriate classification for financial reporting purposes;
- evaluate transactions in a way that allows to reflect their appropriate value in the financial statements;
- determine the time period in which transactions arise to enable their recording in the appropriate accounting period;
- appropriately present transactions and related disclosures in the financial statements in accordance with the accounting framework.

The "Information Technology" Department is responsible for the risk-free functioning of the information system in the Parent company and in "Sopharma Trading" AD – "Business and Technological Development". In each of the companies in the Group was established "Information technology" department, which is responsible for the smooth functioning of the different types of software.

#### *"Accounting" Departments - Implementation of the accounting policy and a key role in financial reporting*

The accounting department of the Parent Company is directly subordinate to the Executive Director. It is headed by the chief accountant. The following positions are subordinate to the chief accountant: deputy chief accountant and heads of sectors and operational accountants. Structurally, the department consists of the following sectors: Fixed assets, Materials, Expenses, Implementation, Foreign currency transactions, Local currency transactions, Salaries. According to their functional characteristics they cover and fully realize the accounting and reporting function in the Company's internal accounting controls and the preparation of financial statements.



The department's responsibilities include the correct and consistent application of the developed accounting policies, the development and application of internal chart of accounts; reporting methodologies; current bookkeeping; current accounting analysis and control of accounting data and documentation; addition of and classification of accounting data for financial reporting purposes; preparation and/or processing of incoming data for approximate accounting estimates with the involved experts and reporting of identified deviations to the Financial Director; and compliance with regulatory requirements in the field of accounting, taxation and other related areas.

The accounting department of "Sopharma Trading" AD is directly subordinated to the Financial Director. It is headed by a chief accountant and a deputy chief accountant. Structurally, the accounting department consists of a chief accountant, two deputy chief accountants, one senior accountant and 18 operational accountants.

In each of the companies in the Group there are corresponding structures that ensure the proper functioning of both the company itself and the control of its financial and accounting activities.

The accounting policy of the Parent Company and the Group, respectively, for the purpose of preparing the consolidated financial reports is subject to annual approval at two levels by the Financial director and the Board of Directors of the Parent Company. The most important aspects necessary for a proper understanding of the financial statements must be disclosed.

Choosing the reporting framework is defined based on the requirements of the Accounting Act. The Company applies International Financial Reporting Standards (IFRS) as adopted by the European Union. The current control for the proper application of IFRS is performed by the Chief Accountant, Finance Director and Audit Committee. Further confirmation of the correctness of the application is received by the external auditors.

The preparation of financial statements of the Parent Company for public use is the result of a comprehensive process of closing an accounting period. This process is formalized through rules and instructions adopted by the management. They are linked to the performance of certain actions and procedures, respectively preparation of certain documents by persons from the "Accounting" Departments or other officials and those actions and procedures are directed to: carrying out inventories; analysis of accounts; sending confirmation letters; determining the best estimates as amortization, revaluations and impairment charges, which are based on reasonable assumptions and classification of accounting data; research and analysis of certain legal documents (contracts, litigation, opinions of legal advisors); research and evaluation reports of experts (appraisers, actuaries, internal auditors, other domestic experts and officials); preparing reports and financial packages for consolidation; preparation, analysis and discussion of draft financial statements.

The process of closure of accounts is managed directly by the Chief Accountants and the Head of Reporting department, while the Financial Director monitors and takes the final decisions on key issues related to the recognition, classification, evaluation, presentation and disclosure concerning certain objects, operations and events as well as overall performance financial statements – individual and consolidated financial statement of the Parent Company.



### ***Control activities***

Control activities in the developed and implemented internal control processes include: reviewing the implementation and results of operations; information processing; physical controls and segregation of duties and responsibilities.

General controls that relate to financial reporting can be categorized as procedures relating to current and periodic reviews and analyses of financial indicators and the input data used for their calculation represented in the financial to show the results of the companies in the Group. They in turn include such reviews and analyses of factually reported results data relative to budgetary, forecast, prior periods and industry. They may also normally contain proposals for optimization or revision of certain budgets.

Controls on the Parent Company's information systems encompass both application program controls and common IT controls, which are policies and procedures that help ensure the continuous functioning of information systems. Typical application controls that are set are: verification of mathematical accuracy of records, maintenance and review of accounts and workflows, automated controls such as input checks and sequencing checks and non-automated tracking of exception reports. Common IT controls include: program change controls, controls that restrict access to programs or data, controls on the implementation of new editions of bundled software application programs, and system software controls that restrict access or ongoing monitoring of the use of system support functions could change financial data or records without leaving a trace of follow-up.

In "Sopharma Trading" AD, the general controls relevant to financial reporting can be categorized as procedures related to current and periodic reviews and analyses of the financial indicators and their inputs, through which the performance and results of the Company's activity are presented in the financial statements. In turn, they include such reviews and analyzes of factual reported results against budget, forecast, prior periods and industry segments. Such financial analyzes are done through the SAP ERP and SAP BI. For the purposes of management, separate forms are approved according to the monthly reports. The reports contain factual and budget figures, analysis of deviations. Comparison of current with previous period. Typically, they may also contain suggestions for optimizations or review of certain budgets.

Most of the companies in the Group have IT Departments which are responsible for the implementation of the control activities.

Applied physical controls in the companies in the Group include:

- a) measures for the physical security of assets - safe equipment and facilities, and special conditions of access to assets and documents;
- b) a specific procedure for approval of access to computer programs and data files;
- c) periodic inventories - procedures for organizing and holding inventory through physical counting /weighing of stocks/ sending appropriate written confirmation and comparing the amounts reflected in inventory control and accounting records/registers. Procedures are also introduced to ensure the timely analysis of the results of the inventories and developing solutions for their accounting and respectively approval by the Executive Director.

Internal controls are provided for the developed and implemented management procedures, organization and execution of the main routine processes (supply and sales) as well as the processes of preparation and adoption of complex estimates (amortization, impairment, revaluation actuarial calculations and long-term provisions).

They include: authorization of individual transactions and issuance of primary documents; review and verification of documents issued and involved in the operation assets; subsequent restatement and comparisons with other documents (contracts, orders, confirmations, price lists, etc.) and persons, as well as segregation of duties and responsibilities of participating officials on each step of the process to ensure checks and balances between them and to reduce the possibilities that any person is in a position both to make and to conceal errors or fraud in the normal course of performing his/her duties.

The Group is in constant expansion of formalized control procedures and activities.

### ***Monitoring of controls***

An important objective with high priority for the managements of the companies in Sopharma Group and particularly the financial directors is to establish and maintain continuous and effective internal controls. Monitoring of controls by the managements includes considering whether they are working as intended and whether they are modified appropriately to reflect changing conditions. The ongoing monitoring of controls may include activities such as a review by the management of the company as to whether internal management reports are timely and whether key data are consistent with third party endorsement and assumptions by internal auditors of compliance with policies and the procedures for the implementation of the routine processes (sales and deliveries) by the personnel employed in them, incl. internal controls, incl. when comparing contracts with counterparties, as well as oversight of ethics or business practice by the legal department of companies and the investor relations division of public companies. Ongoing monitoring is done to ensure that controls continue to operate effectively in time.

Internal auditors, as well as other personnel performing supervisory, monitoring or control functions, incl. the companies' accounting departments and the Reporting Department also contribute to the ongoing monitoring of the entity's internal control over its processes through its assessments of individual controls or control groups. Normally, they periodically provide such information in the course of performing their duties and functions, and their judgments about the operation of certain internal controls, focusing significantly on the assessment of their effectiveness, communicate with the relevant persons the information on the strengths and weaknesses of internal controls and make recommendations for their improvement.

Ongoing monitoring activities include the use of information from external parties that indicate problems or identifying areas in need of improvement. Such parties are customers, suppliers and servicing banks. In addition, the regulatory authority in the face of the FSC can also communicate with management on matters affecting the functioning of the internal control, for example, exchange of information directly monitored by the Commission related to the implementation of specific activities or transactions of the companies or revisions by the FSC itself. Also when implementing the activities on current monitoring management always takes into account the communication with external auditors related to internal control and the weaknesses discovered by them and the recommendations made.

**IV. Information in accordance with Article 10, paragraph 1, letter "c", "d", "e", "h" and "i" of Directive 2004/25/EC of the European Parliament and of the Council as of 21 April 2004 on proposals for takeover.**

*1. Significant direct or indirect shareholdings (including indirect shareholdings through pyramid structures and cross-shareholdings) within the meaning of Article 85 of Directive 2001/34/EU;*

There is no reaching, exceeding or falling below one of the thresholds of 10%, 20%, 1/3, 50% and 2/3 of the share capital of the Parent Company during the year.

*2. Holders of all securities with special control rights and description of these rights;*

For the Parent Company and for the other companies in the Group, there are no securities with special rights issued. According to the Statutes of the companies in the Group, all shares issued by them are of the same class, registered, common and indivisible. Each share entitles to one vote at the General meeting of shareholders, to dividends and liquidation part, in proportion to the nominal value of the share.

*3. All restrictions on the voting rights, such as restrictions on the voting rights of holders of a given percentage or number of votes, deadlines for exercising the voting rights or systems through which through cooperation with the company the financial rights attached to the securities are separated from the holding of the securities;*

There are no restrictions on the voting rights in the Parent Company and the other public companies in the Group.

*4. The rules which regulate the appointment and replacement of Board members and amendments to its Articles of Incorporation.*

The Board of Directors of "Sopharma" AD proposes to the General Meeting amendments and/or supplements to the Statutes, changes in the constitution of the Board of Directors release and election of new Board members.

Members of the Board of Directors may be physical or legal persons meeting the requirements of Article 234 of the Commercial Code and Article 116a, paragraph 2 of the Law on public offering of securities.

When a member of the Board of Directors is a legal entity, it shall designate a representative/and/ for the performance of duties in the Board. The legal entity is jointly and unlimitedly liable with the other members of the Council for the obligations arising from the actions of his representative.

Natural persons who are legal persons - members of the Board of Directors must meet the requirements of Art. 234, paragraph 2 of the CA.

They cannot be members of the Board of Directors of persons who were members of management or supervisory body of a company terminated due to bankruptcy in the last two years preceding the date of the declaration of insolvency, if unsatisfied creditors.

A member of the Board of Directors cannot be a person who has been governor, member of the management or supervisory body of the company, which was established by an effective penalty decree defaulting on creation and preservation of its defined levels of stocks under the stocks of oil and oil products.

At least one third of members of the Board of Directors must be independent entities. The independent member of the Board cannot be:

- employee of the public company;
- shareholder who owns directly or through related parties, at least 25 percent of the votes in the General meeting or related company;
- a person who is in permanent trade relations with the public company;
- member of the management or supervisory body, procurator or employee of a company or other entity.
- a person connected with another member of management or supervisory body of the public company.

Members of the Board of Directors can be reelected without limitation.

In case of changes in legislation, the next General meeting of shareholders shall decide on amending the Statute in order to align its provisions with those of existing regulations. By making this decision, the affected versions of the Charter shall be interpreted in accordance with the Constitution and laws of the country.

The Statute shall be amended by the General meeting of shareholders with a majority of 2/3 / two thirds / of the represented at the General meeting capital. The current Statute was entered in the Commercial Register under number № 20210412150242.

#### *5. The powers of Board members, and in particular the right to issue or buy back shares.*

The powers of the Board of Directors are regulated in the Statute of the Parent Company. A decision to issue bonds can be taken by the Board of Directors with a qualified majority of two thirds of its members.

The Board of Directors is authorized to redemption of shares under certain conditions, according to a decision of the Extraordinary general meeting of 23.02.2018.

## **V. Composition and functioning of the administrative, management and supervisory bodies and their committees.**

### **1. Composition of the Board of Directors of “Sopharma” AD:**

The Parent Company is managed and represented by a Board of Directors, which consists of five physical persons meeting the requirements of Article 234 of the Commercial Code and Article 116a, paragraph 2 of the Law on public offering of securities. The composition of the Board of Directors can be changed by the General meeting at any time.

The composition of the Board of Directors is described in section I. Overview of “Sopharma” AD in the Management report.

According to Article 116 Paragraph 2 of the Law on public offering of securities at least one third of the members of the Board of Directors must be independent. In this case, these are:

- Ognian Kirilov Palaveev
- Alexander Viktorov Tchaoushev

The members of the Board of Directors are aware of their rights and duties associated with the position they take.

## 2. Rules of the Board of Directors

“Sopharma” AD has developed Rules of procedure of the Board of Directors that match and are an addition to the principles enshrined in the Corporate Governance Program. The Statute of the Company is prepared in accordance with the requirements of LPOS and include provisions on the right of shareholders to timely notification on various issues.

The Board of Directors shall hold regular meetings at least once a month.

## 3. Minutes of meetings

The decisions of the Board of Directors shall be kept, which shall be signed by all members present at the meeting.

The minutes are kept by the Investor Relations Director of the Company in a special register in accordance with the provisions of Art. 116d, para. 3, item 3 of LPOS.

The minutes of meetings are trade secret. Facts and circumstances that are included therein can be published, disclosed or brought to the attention of third parties only by a decision of the Board of Directors or when it is required by law.

## 4. Responsibility

The members of the Board of Directors must give a guarantee for their management in an amount determined by the General Meeting, but not less than three times their monthly gross salary.

The members of the Board of Directors are jointly liable for the damages caused to the Company.

Each member of the Board of Directors may be released from liability if it is established that they have no fault for a damage. The General Meeting can discharge the Board of Directors on the annual general meeting in the presence of audited annual financial statements for the previous year and interim financial statements for the period from the beginning of the current year to the date of the general meeting.

The Board of Directors reports for its activities to the General meeting of shareholders.

## 5. Role of the Board of Directors to implement the principles of good corporate governance

The Board of Directors decides on all matters relating to the Parent Company, except those under current law and the Statute of the Company are of the exclusive competence of the General meeting. According to the structure and composition of the management bodies of each of the Group's companies, their functions are allocated to the departments that exist in them. The functioning of the management and supervisory bodies is aimed at bringing the management of each company in line with the strategic objectives of both- those of the company itself and those of the Group.

The Board of Directors assigns the implementation of its decisions and functions under the operational management of the Company to one of its members /CEO/. The Executive Director may be changed at any time.

The members of the Board of Directors of public companies in the Group shall submit a declaration to the Financial Supervision Commission /FSC/, to “BSE – Sofia” AD and the Company itself under Art. 114b of LPOS and under Art. 247, item 4 of the Commercial Law. The change in these circumstances shall be declared within the respective terms after its occurrence.

In carrying out its activities the Board of Directors comply with the accepted principles of Corporate governance of the Company.

The Board of Directors shall make best efforts to ensure easy and timely access to public information for an informed exercise of shareholders' rights, respectively making an informed investment decision of investors.

#### 6. Due diligence. Avoiding conflict of interest.

The members of the Board of Directors are required to:

- carry out their duties with due diligence, to be loyal to the Company and act in the best interest of its shareholders;
- perform their duties with the inherent professional skill, diligence and responsibility in a way that they reasonably believe is in the interest of all shareholders of the Company, by using only information that they reasonably believe to be reliable, complete and timely;
- prefer the interest of the Company and the investors in the Company before their own interest and not used for the benefit of themselves or others at the expense of the Company and shareholders facts and circumstances that are learned in the course of their professional duties;
- avoid direct or indirect conflicts between their interests and the interests of the Company, and if such conflicts arise - to disclose promptly and fully and do not participate and do not affect the other members of the council in making decisions in such cases;
- not to disclose information about the deliberations and decisions of the meetings of the Board of Directors, as well as other non-public information about the Company, even after they cease to be members of the Board of Directors until the public disclosure of the circumstances of the Company;
- provide and disclose information to shareholders and investors in accordance with regulations and internal acts of the Company.

The Board of Directors assisted by an Audit Committee, which under the Independent Financial Audit and International Standards on Auditing, performs the following functions:

- monitors the financial reporting processes in the enterprise;
- monitors the effectiveness of the internal control in the enterprise;
- monitors the effectiveness of risk management in the enterprise;
- monitors the independent financial audit in the enterprise;
- reviews the independence of the auditor of the Company in accordance with the law and the Code of Ethics for Professional Accountants, including monitoring the provision of ancillary services by the auditor to the audited enterprise.

At the Extraordinary General Meeting of Shareholders of "Sopharma" AD, held on 20.11.2008, an Audit Committee has been elected, consisting of three members: Tsvetanka Zlateva, Vasil Piralkov and Vassil Naydenov with a 3-year term of office, which has been re-elected three consecutive times. By decision of the GMS dated 02.06.2017 Vassil Piralkov was replaced by Kristina Atanasova.

**VI. Description of the diversity policy, applied to administrative, management and supervisory bodies of the issuer in relation to aspects such as age, sex or education and professional experience, the objectives of this policy of diversity, the manner of its implementation and results during the reporting period.**



Sopharma Group is making every effort to ensure equal opportunities in recruitment and compliance in form and substance of the whole range of laws pertaining to fair employment practices and prevent discrimination.

Discrimination, whether based on race, sex, or expression of gender, color, creed, religion, national origin, nationality, citizenship, age, disability, genetic information, marital status (including domestic partnerships and civil unions as defined and recognized by applicable law), sexual orientation, culture, ancestry, veteran's status, socioeconomic status or other legally protected personal characteristic, are unacceptable and completely not consistent with the traditions of the Group, for providing a respectful, professional and dignified workplace. Retaliation against individuals for raising claims of discrimination or harassment is also prohibited.

The main objectives that the Group set itself in the implementation of diversity policies are:

- Attracting, hiring and holding on of people with a wide range of professional skills. The diverse capabilities of management and personnel open up new opportunities for innovative and creative solutions, increase creativity and innovation. This in turn would lead to more efficient adaptation to the impact of globalization and technological change. A diverse workforce can increase company's effectiveness to achieve its objectives. It can lift morale, giving access to new market segments and increase productivity.
- Fostering a working environment that accepts ethno-cultural diversity and in which individual differences are valued and respected.
- Solve one of the most important issues for the employer - that of labor shortages and problems relating to the recruitment and retention of highly skilled workers.
- Improving the reputation and overall performance of the companies in the group to external stakeholders and society.
- Creating opportunities for disadvantaged groups and building the unity of society.

Sopharma Group strives to achieve targets as approved and put into practice important for Company types manifolds. By adopting best practices from other companies and institutions, the managements of the companies in the Group want to make diversity management a functioning part of the company. Sopharma endeavor employees, consumers, customers and investors to be informed about the importance of diversity to them and their work, aiming to build their confidence and willingness to support.

The diversity policy provides a variety of board members, ensuring reliable system management and control, and good corporate governance is an essential element of safe and stable operation of Sopharma Group. They meet the highest standards applied by the Company in order to realize its objectives and strategies.

The composition of the management bodies of the companies in the Group and the number of people involved in it, is consistent with the size, complexity and scope of the operations of the companies and ensure sufficient level of general expertise.

Members of the management bodies of the companies in the Group have extensive experience as a theoretical gained through education, training and qualifications and practical acquired during previous positions occupied. They are persons of good repute and managerial capabilities, with high professional and moral qualities.

Compliance with the principle of gender equality, as witnessed by the many women occupying senior positions in the companies in the Group. The male/female ratio in most companies in the Group is in favor of women and is due to the nature of the production process.



The diversity policy with respect to the management authorities do not allow a limitation of age composition.

In the companies in the Group there are representatives from various minority ethnic groups-ethnicities. The companies in Sopharma Group employ people from disadvantaged backgrounds. The aim is to provide young people with opportunities for professional and personal development.

In Sopharma Group companies have no discrimination on any grounds.

Section V of the Rules of Internal labor order of “Sopharma” AD regulates the rights and protection of employees when it comes to any discriminatory action by the employer.

On the basis of Ordinance on labor readjustment /SG, issue 7/1987, amended and supplemented Issue 111 of 28.12.2001, amend. Issue 78 of 30.09.2005 which entered into force on 01.10.2005 /, Ordinance № 8 for determination of jobs suitable for labor readjustment of disabled performance /SG issue 52/1987, SG, issue 47/1990/ and Ordinance amending and supplementing Ordinance № 8 for determination of jobs suitable for labor readjustment of persons with disabilities /SG, 44/1993/ and according to Art. 27 of the integration of people with disabilities, each year a special Committee on labor readjustment meets in “Sopharma” AD. It develops a list of suitable locations and positions for labor readjustment of disabled workers with permanent disabilities in accordance with the percentage allocated to the sector in accordance with Art. 315 of the Labor Code and of pregnant workers and workers who are breastfeeding. Commission shall examine specific cases for labor readjustment and indicates appropriate places according to the approved list.



28.04.2021  
Sofia

**Ognian Donev, PhD**  
**Executive Director**