NOTIFICATION OF INSIDERS' TRANSACTIONS under art. 19 of Regulation 596/2014

Dated: 19.12.2024

1	Details of the person discharge	ng managerial responsibilities/person closely associated
a)	Name	Donev Investments Holding AD
u,	Nume	[For physical persons: the first name and the last name(s).]
		[For legal persons: full name including legal form as provided for in the register where it is incorporated, if
		applicable.]
2	Reason for the notification	applicable.]
a)	Position/status	Based on the provisions of art.3, para 1, item 26, letter "g" of Regulation 596/2014 as a person closely
aj	Position/status	associated.
		Ognian Donev is an Executive director and chairman of the Board of directors of Sopharma AD and chairman
		of the Board of directors of Donev Investments Holding AD
		[For persons discharging managerial responsibilities: the position occupied within the issuer, emission
		allowances market participant/auction platform/auctioneer/auction monitor should be indicated, e.g. CEO,
		[For persons closely associated,
		-An indication that the notification concerns a person closely associated with a person discharging managerial
		responsibilities;
b)	Initial notification/ Amendment	- Name and position of the relevant person discharging managerial responsibilities.]
		Initial notification
		[Indication that this is an initial notification or an amendment to prior notifications. In case of amendment,
		explain the error that this notification is amending.]
3.	Details of the issuer, emission	allowance market participant, auction platform, auctioneer or auction monitor
a)	Name	Sopharma AD
		[Full name of the entity.]
b)	LEI	097900BGGW0000048796
		[Legal Entity Identifier code in accordance with ISO 17442 LEI code.]
4.	Details of the transaction(s):	ection to be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and (iv) each
	place where transactions hav	been conducted
a)	Description of the financial	Shares, ISIN № BG11SOSOBT18
	instrument, type of	Indication as to the nature of the instrument
	instrument Identification code	 a share, a debt instrument, a derivative or a financial instrument linked to a share or
		debt instrument;
		— an emission allowance, an auction product based on an emission allowance or
		derivative relating to an emission allowance.
		Instrument identification code as defined under Commission Delegated Regulation supplementing Regulatio
		(EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standard
		for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) N
		600/2014.
b)	Nature of the transaction	Buy
5)		Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of th
		Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No
		596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.
		Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is
c)	Price(s) and volume(s)	Price(s) volume(s)
٥,	i risc(s) and volume(s)	5.76 Volume(s)
		5.76 898.1
		5.76 10 000.1
		5.76 470.1
		5.76 10 000.0
		5.76
		5.76 9 870.1
		5.76 297.
		5.76 2 703.
		5.76 297.
		5.76 703.
		5.74
		5.74
		5.74 235.0
		5.76 65.
		5.76
		5.74 4 000.1
		5.74 400.0
		5.74 600.0
		5.74 400.0
		5.72

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		5.72	700.00
		5.72	3 000.00
		5.70	500.00
		5.72	51.00
		5.70	500.00
		5.70	198.00
		5.72	3 000.00
		5.72	2 000.00
		5.70	600.00
		5.72	151.00
		[Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on the same financial instrument or emission allowance are executed on the same day and on the same place of transactions and volumes of these transactions shall be reported in this field, in a two columns form as presente above, inserting as many lines as needed. Using the data standards for price and quantity, including where applicable the price currency and the quacurrency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/201 the European Parliament and of the Council with regard to regulatory technical standards for the reporting transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.]	action, d antity .4 of
d)	Aggregated information	Price volume	
		5.75	63000
		[The volumes of multiple transactions are aggregated when these transactions:	
	 Aggregated volume 	 relate to the same financial instrument or emission allowance; 	
	Price	— are of the same nature;	
		— are executed on the same day; and	
		— are executed on the same place of transaction.	
		are executed on the same place of transaction.	
		·	
		Using the data standard for quantity, including where applicable the quantity currency, as defined under	
		Using the data standard for quantity, including where applicable the quantity currency, as defined under [Price information:	
		Using the data standard for quantity, including where applicable the quantity currency, as defined under [Price information: — In case of a single transaction, the price of the single transaction;	ated
		Using the data standard for quantity, including where applicable the quantity currency, as defined under [Price information: — In case of a single transaction, the price of the single transaction; — In case the volumes of multiple transactions are aggregated: the weighted average price of the aggregated.	
e)	Date of the transaction	Using the data standard for quantity, including where applicable the quantity currency, as defined under [Price information: — In case of a single transaction, the price of the single transaction; — In case the volumes of multiple transactions are aggregated: the weighted average price of the aggregations are data standard for price, including where applicable the price currency, as defined under Commissions.	
e)	Date of the transaction	Using the data standard for quantity, including where applicable the quantity currency, as defined under [Price information: — In case of a single transaction, the price of the single transaction; — In case the volumes of multiple transactions are aggregated: the weighted average price of the aggregation using the data standard for price, including where applicable the price currency, as defined under Commission 18.12.2024	
e)	Date of the transaction	Using the data standard for quantity, including where applicable the quantity currency, as defined under [Price information: — In case of a single transaction, the price of the single transaction; — In case the volumes of multiple transactions are aggregated: the weighted average price of the aggregation using the data standard for price, including where applicable the price currency, as defined under Commission 18.12.2024 [Date of the particular day of execution of the notified transaction.	
		Using the data standard for quantity, including where applicable the quantity currency, as defined under [Price information: — In case of a single transaction, the price of the single transaction; — In case the volumes of multiple transactions are aggregated: the weighted average price of the aggregation using the data standard for price, including where applicable the price currency, as defined under Commistant 18.12.2024 [Date of the particular day of execution of the notified transaction. Using the ISO 8601 date format: YYYY-MM-DD; UTC time.]	
e) f)	Date of the transaction Place of the transaction	Using the data standard for quantity, including where applicable the quantity currency, as defined under [Price information: — In case of a single transaction, the price of the single transaction; — In case the volumes of multiple transactions are aggregated: the weighted average price of the aggregation using the data standard for price, including where applicable the price currency, as defined under Commission 18.12.2024 [Date of the particular day of execution of the notified transaction.	

if the transaction was not executed on any of the above mentioned venues, please mention 'outside a trading