

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

Sopharma Group as at 30 September 2017

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.

- On 04.04.2017 a contract was signed for the sale of the Group's participation through the subsidiary SEA Briz, Latvia in the amount of 50% in the joint venture OOO Vivaton Plus, Belarus. Under the terms of the contract, the transaction should be finalized within 30 days of the date of its conclusion.
- OOO Ivem i K, Belarus is a subsidiary through SOOO Brititrade, Belarus, OOO Farmacevt Plus, Belarus and OOO Zdorovei, Belarus – SOOO Brititrade and OOO Farmacevt Plus own each 25% of the capital of OOO Ivem i K and OOO Zdorovei owns 50% of the capital of OOO Ivem i K.
- OOO Ariens, Belarus is a subsidiary through OOO Farmacevt Plus, Belarus and OOO Zdorovei, Belarus – OOO Farmacevt Plus and OOO Zdorovei own each 50% of the capital of OOO Ariens.

1.10. Change in the Company's auditors.

The General Meeting of Shareholders of Sopharma AD selected the auditing company Baker Tilly Clitou and Partners Ltd. as a registered auditor of the Company for 2017. The reason for change of the previous external auditor "AFA" OOD is compliance with the requirements of art.65, par.3 of the Independent Financial Act Audit.

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>Jan-Sept 2017Interest %</i> | <i>Jan-Sept 2016Interest %</i> | <i>Date of acquisition of control</i> | <i>Date of disposal of control</i> |
|-------------------------------------|---|---|--|---|
| <i>Companies in Bulgaria</i> | | | | |

| | | | | |
|---|-------|-------|------------|------------|
| Sopharma Trading AD* | 72.66 | 72.58 | 08.06.2006 | |
| Pharmalogistica AD | 89.39 | 84.93 | 15.08.2002 | |
| Electroncommerce EOOD | 100 | 100 | 09.08.2005 | |
| Biopharm Engineering AD | 97.15 | 97.15 | 10.03.2006 | |
| Sopharma Buildings REIT | 40.38 | 40.39 | 04.08.2008 | |
| Momina Krepost AD | 93.54 | 93.54 | 01.01.2008 | |
| Unipharm AD * | 98.77 | 77.89 | 27.10.2010 | |
| Phyto Palauzovo AD | 95 | 95 | 21.09.2012 | |
| Sopharmacy EOOD** | 72.66 | 72.58 | 19.01.2015 | |
| Sopharmacy 2 EOOD** | 72.66 | 72.58 | 05.06.2015 | |
| Sopharmacy 3 EOOD** | 72.66 | 72.58 | 02.12.2015 | |
| Sopharmacy 4 EOOD** | 72.66 | 72.58 | 29.02.2016 | |
| Sopharmacy 5 EOOD** | 72.66 | 72.58 | 01.03.2016 | |
| Sopharmacy 6 EOOD** | 72.66 | 72.58 | 03.12.2015 | |
| Sopharmacy 7 EOOD** | 72.66 | - | 15.03.2017 | |
| Sopharmacy 8 EOOD** | 72.66 | - | 27.06.2017 | |
| Sopharmacy 9 EOOD** | 72.66 | - | 11.09.2017 | |
| Sopharmacy 10 EOOD** | 72.66 | - | 11.09.2017 | |
| Medica AD | - | 97.96 | 26.10.2015 | 08.08.2017 |
| Medica-Zdrave EOOD (in liquidation)** | - | 97.96 | 26.10.2015 | 22.02.2017 |
| Veta Pharma AD | 68.05 | 68.05 | 11.11.2016 | |
| Aromania OOD | 76 | - | 31.07.2017 | |
| * <i>efficient percentage of interest</i> | | | | |
| ** <i>indirect interest</i> | | | | |

| <i>Subsidiaries</i> | Jan-Sept 2017 <i>Interest</i> % | Jan-Sept 2016 <i>Interest</i> % | <i>Date of acquisition of control</i> | <i>Date of disposal of control</i> |
|---|--|--|--|---|
| <i>Companies abroad</i> | | | | |
| SIA Briz | 66.13 | 66.13 | 10.11.2009 | |
| SOOO Brititrade ** | 52.90 | 52.90 | 10.11.2009 | |
| PAO Vitamini | 99.56 | 99.56 | 18.01.2008 | |
| Sopharma Warsaw SP. Z.O.O. | 100 | 100 | 23.11.2010 | |
| Sopharma Trading d.o.o. Belgrade** | 72.66 | 72.58 | 05.06.2015 | |
| Sopharma Poland Z.O.O. – in liquidation | 60 | 60 | 16.10.2003 | |
| OOO Tabina ** | 65.64 | 62.82 | 08.04.2011 | |
| SOOO Brizpharm ** | 32.59 | 46.26 | 20.12.2012 | |
| ODO Alean ** | - | 62.96 | 07.02.2013 | 31.08.2017 |

| | | | | |
|------------------------------|-------|-------|------------|------------|
| OOO Sopharma Ukraine | 100 | 100 | 07.08.2012 | |
| OOO Farmacevt Plus ** | 36.93 | 42.98 | 31.05.2013 | |
| UAB TBS Pharma** | 33.73 | 33.73 | 01.03.2013 | |
| ODO Vestpharm ** | - | 62.96 | 04.07.2013 | 01.08.2017 |
| ODO BelAgroMed ** | - | 62.96 | 30.07.2013 | 01.08.2017 |
| TOO Sopharma Kazakhstan | 100 | 100 | 06.11.2014 | |
| OOO Danapharm** | 47.61 | 48.94 | 28.02.2015 | |
| OOO Galenapharm** | 48.94 | 48.94 | 28.02.2015 | |
| ODO Medjel** | 55.55 | 48.94 | 28.02.2015 | |
| ODO Alenpharm-plus** | 48.94 | 48.94 | 30.06.2015 | |
| OOO Farmatea** | 17.85 | 22.39 | 30.11.2015 | |
| OOO Mobil Line** | - | 48.94 | 16.02.2016 | 04.07.2017 |
| ODO SalusLine** | 48.94 | 48.74 | 18.11.2016 | |
| Rap Pharma International OOD | 51 | - | 14.04.2017 | |
| ZAO Interfarm** | 59.52 | - | 26.04.2017 | |
| Lekovit D.o.o.** | 50.86 | - | 09.08.2017 | |
| OOO Zdorovei ** | 28.81 | - | 16.08.2017 | |
| OOO Ivem I K** | 36.86 | - | 16.08.2017 | |
| OOO Ariens** | 32.87 | - | 16.08.2017 | |

* *efficient percentage of interest*

** *indirect interest*

- 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 72.63% 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 0.03% 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;
- 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 Sopharmacy 7 EOOD;
- Sopharmacy 8 EOOD is a subsidiary of Sopharmacy EOOD whereas the latter holds 100% of the capital Sopharmacy 7 EOOD;
- Sopharmacy 9 EOOD is a subsidiary of Sopharmacy EOOD whereas the latter holds 100% of the capital Sopharmacy 7 EOOD;
- Sopharmacy 10 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;
- Lekovit D.o.o. is a subsidiary through Sopharma Trading AD – Sopharma Trading AD owns 70% of the capital of Lekovit D.o.o.;
- 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, and its subsidiary SOOO Brititrade, Belarus - whereas SIA Briz, Latvia holds 70.1% of the capital of OOO Tabina and SOOO Brititrade – 24.9% 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 1.27% of the capital of SOOO Brizpharm and OOO Pharmacevt Plus – 85.98% of the capital of SOOO Brizpharm;
- OOO Farmacevt Plus, Belarus, is a subsidiary through SIA Briz, Latvia, whereas the latter holds 55.84% 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;
- OOO Danapharm, Belarus is a subsidiary through SOOO Brititrade, Belarus – SOOO Brititrade owns 90% of the capital of OOO 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 60% and SOOO Brititrade holds 30% 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, and their subsidiary OOO Ivem I K, Belarus - whereas SIA Briz

holds 2%, OOO Farmacevt Plus holds 49% and OOO Ivem I K – 49% of the capital of ODO Farmatea;

- ODO SalusLine, Belarus, is a subsidiary through SIA Briz, Latvia, and its subsidiary SOOO Brititrade, Belarus - SIA Briz holds 10%, SOOO Brititrade holds 80%.
- ZAO Interfarm, Belarus, is a subsidiary through SIA Briz, Latvia, and its subsidiary SOOO Brititrade, Belarus - SIA Briz holds 50%, SOOO Brititrade holds 50%.
- OOO Zdorovei, Belarus is a subsidiary through SIA Briz, Latvia and its subsidiary OOO Farmacevt Plus, Belarus – SIA Briz owns 19% and OOO Farmacevt Plus – 44% of the capital of OOO Zdorovei;
- OOO Ivem i K, Belarus is a subsidiary through SOOO Brititrade, Belarus, OOO Farmacevt Plus, Belarus and OOO Zdorovei, Belarus – SOOO Brititrade and OOO Farmacevt Plus own each 25% of the capital of OOO Ivem i K and OOO dorovei owns 50% of the capital of OOO Ivem i K.
- OOO Ariens, Belarus is a subsidiary through OOO Farmacevt Plus, Belarus and OOO Zdorovei, Belarus – OOO Farmacevt Plus and OOO Zdorovei own each 50% of the capital of OOO Ariens.

AVAILABLE-FOR-SALE INVESTMENTS

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

| | <i>Country</i> | <i>Jan-Sept 2017</i> | <i>Interest</i> | <i>Jan-Sept 2016</i> | <i>Interest</i> |
|-------------------------------|----------------|--------------------------|-----------------|----------------------|-----------------|
| | | <i>BGN '000</i> | <i>%</i> | <i>BGN '000</i> | <i>%</i> |
| Lavena AD | Bulgaria | 2,896 | 11.34 | 2,883 | 11.29 |
| Olainfarm AD | Latvia | 2,171 | 0.77 | 1,796 | 0.77 |
| Achieve Life Sciences Inc. | USA | 1,663 | 3.28 | - | - |
| Hydroizomat AD | Bulgaria | 202 | 13.53 | 131 | 10.65 |
| OOO Pharmico | Belarus | 172 | 2.00 | 172 | 2.00 |
| Sopharma Properties REIT | Bulgaria | 116 | 0.10 | 64 | 0.07 |
| ODO DKM-Pharm | Belarus | 100 | 2.00 | 100 | 2.00 |
| Todorov AD | Bulgaria | 93 | 10.57 | 37 | 4.98 |
| OOO Set Aptek | Belarus | 70 | 2.00 | 70 | 2.00 |
| BTF Expat Bulgaria | Bulgaria | 25 | 0.20 | 82 | 0.32 |
| Elana Agrocredit AD | Bulgaria | 15 | 0.20 | - | - |
| Achieve Life Sciences Inc. | USA | - | - | 290 | 4.70 |
| Other | | 111 | | 96 | |
| Total | | 7,634 | | 5,721 | |

The other available-for-sale investments as at 30 September 2017, amounting to BGN 112 thousand (31 December 2016: BGN 96 thousand), include a number of minority interests of the Group in the capital of seven companies (31 December 2016: five companies).

The investments in Extab Pharma 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 as at 30.09.2017.