

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 31 March 2018

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

1.10. Change in the Company's auditors.

The General Meeting of Shareholders of Sopharma AD selected the auditing company Baker Tilly Klitou and Partners OOD 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:

Subsidiaries	<i>31.03.2018</i>	<i>31.12.2017</i>	<i>Date of acquisition of control</i>	<i>Date of disposal of control /merger</i>
	Share	Share		
<i>Companies in Bulgaria</i>	%	%		
Sopharma Trading AD*	72.85	72.85	08.06.2006	
Pharmalogistica AD	89.39	89.39	15.08.2002	
Electroncommerce EOOD	100.00	100.00	09.08.2005	
Biopharm Engineering AD	97.15	97.15	10.03.2006	
Sopharma Buildings REIT	40.38	40.38	04.08.2008	
Momina Krepost AD	93.55	93.55	01.01.2008	
Unipharm AD *	98.77	98.77	27.10.2010	
Phyto Palauzovo AD	95.00	95.00	21.09.2012	
Sopharmacy EOOD**	72.85	72.85	19.01.2015	
Sopharmacy 2 EOOD**	72.85	72.85	05.06.2015	
Sopharmacy 3 EOOD**	72.85	72.85	02.12.2015	

Sopharmacy 4 EOOD**	72.85	72.85	29.02.2016	
Sopharmacy 5 EOOD**	72.85	72.85	01.03.2016	
Sopharmacy 6 EOOD**	72.85	72.85	03.12.2015	
Sopharmacy 7 EOOD**	72.85	72.85	15.03.2017	
Sopharmacy 8 EOOD**	72.85	72.85	27.06.2017	
Sopharmacy 9 EOOD**	72.85	72.85	11.09.2017	
Sopharmacy 10 EOOD**	72.85	72.85	11.09.2017	
Medica AD	-	-	26.10.2015	08.08.2017
Medica-Zdrave EOOD **	-	-	26.10.2015	22.02.2017
Veta Pharma AD	99.98	99.98	11.11.2016	
Aromania OOD	76.00	76.00	31.07.2017	
Pharmastore 1 EOOD**	72.85	72.85	07.12.2017	
Pharmastore 2 EOOD **	72.85	72.85	07.12.2017	
Pharmastore 3 EOOD **	72.85	72.85	07.12.2017	
Pharmastore 4 EOOD **	72.85	72.85	07.12.2017	
Pharmastore 5 EOOD **	72.85	72.85	07.12.2017	
<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.	100.00	100.00	23.11.2010	
Sopharma Trading d.o.o. Belgrade**	72.85	72.85	05.06.2015	
Sopharma Poland Z.O.O. – in liquidation	60.00	60.00	16.10.2003	
OOO Tabina **	53.71	54.37	08.04.2011	
SOOO Brizpharm **	31.45	31.45	20.12.2012	
ODO Alean **	-	-	07.02.2013	31.08.2017
OOO Sopharma Ukraine	100.00	100.00	07.08.2012	
OOO Farmacevt Plus **	35.60	35.60	31.05.2013	
UAB TBS Pharma**	33.73	33.73	01.03.2013	
ODO Vestpharm **	-	-	04.07.2013	01.08.2017
ODO BelAgroMed **	-	-	30.07.2013	01.08.2017
TOO Sopharma Kazakhstan	100.00	100.00	06.11.2014	
OOO Danapharm**	-	-	28.02.2015	01.12.2017
OOO Galenapharm**	54.62	54.62	28.02.2015	
ODO Medjel**	55.55	55.55	28.02.2015	
ODO Alenpharm-plus**	52.24	52.24	30.06.2015	
OOO Farmatea**	38.18	38.18	30.11.2015	
OOO Mobil Line**	-	-	16.02.2016	04.07.2017
ODO SalusLine**	52.24	52.24	18.11.2016	
Rap Pharma International OOD	51.00	51.00	14.04.2017	
ZAO Interfarm**	59.52	59.52	26.04.2017	
Lekovit D.o.o.**	50.96	50.96	09.08.2017	
OOO Zdrovei **	34.79	35.00	16.08.2017	

OOO Ivem I K**	42.83	39.62	16.08.2017
OOO Ariens**	35.20	35.30	16.08.2017

* *efficient percentage of interest*

** *indirect interest*

- Sopharma Trading AD is a subsidiary of Sopharma AD, the control there on being acquired and exercised through the direct participation of the parent company in the ownership of Sopharma Trading AD with 72.67% and the indirect participation of the parent company with 0.03% through the subsidiary Unipharm AD holding 0.18% 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 Pharma Online 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 8 EOOD;
- Sopharmacy 9 EOOD is a subsidiary of Sopharmacy EOOD whereas the latter holds 100% of the capital Sopharmacy 9 EOOD;
- Sopharmacy 10 EOOD is a subsidiary of Sopharmacy EOOD whereas the latter holds 100% of the capital Sopharmacy 10 EOOD;
- Pharmastore 1 EOOD is a subsidiary through Sopharma Trading AD – Sopharma Trading AD holds 100% of the capital of Pharmastore 1 EOOD.
- Pharmastore 2 EOOD is a subsidiary through Sopharma Trading AD – Sopharma Trading AD holds 100% of the capital of Pharmastore 2 EOOD.
- Pharmastore 3 EOOD is a subsidiary through Sopharma Trading AD – Sopharma Trading AD holds 100% of the capital of Pharmastore 3 EOOD.

- Pharmastore 4 EOOD is a subsidiary through Sopharma Trading AD – Sopharma Trading AD holds 100% of the capital of Pharmastore 4 EOOD.
- Pharmastore 5 EOOD is a subsidiary through Sopharma Trading AD – Sopharma Trading AD holds 100% of the capital of Pharmastore 5 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 11.1% of the capital of OOO Tabina and SOOO Brititrade – 88.9% 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 53.84% 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 53% and SOOO Brititrade holds 37% 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 35% and SOOO Brititrade holds 55% 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 35%, SOOO Brititrade holds 80% of the capital of ODO SalusLine.

- 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 – 63% 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 Framacevt 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>31.03.2018</i>	<i>Interest</i>	<i>31.12.2017</i>	<i>Interest</i>
		<i>BGN '000</i>	<i>%</i>	<i>BGN '000</i>	<i>%</i>
Lavena AD	Bulgaria	3 499	11.24	3 519	11.30
Olainfarm AD	Latvia	1 874	0.77	1 826	0.77
Achieve Life Siences Inc.	USA	762	3.01	770	3.01
Sopharma Properties REIT	Bulgaria	744	0.56	664	0.50
Hydroizomat AD	Bulgaria	500	14.11	489	13.81
OOO Pharmico	Belarus	172	2.00	172	2.00
Todorov AD	Bulgaria	156	10.83	155	10.56
OOO Aptekar-Centr	Belarus	161	2.00	-	-
ODO DKM-Pharm	Belarus	100	2.00	100	2.00
BTF Expat Bulgaria	Bulgaria	67	0.17	78	0.19
OOO Set Aptek	Belarus	70	2.00	70	2.00
Elana Agrocredit AD	Bulgaria	31	-	13	0.05
Other		109		126	
Total		8 245		7 982	

The other available-for-sale investments as at 31 March 2018, amounting to BGN 109 thousand (31 December 2017: BGN 126 thousand), include a number of minority interests of the Group in the capital of nine companies (31 December 2017: eight companies).

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

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

All circumstances, that the company considers important for the investors while making the decision to acquire, sell or continue to possess shares are revealed in public, are included in the interim consolidated financial statement as at 31.03.2018.