

DECLARATION

in accordance to Article 100o, Para 4, Item 3 of the Public Offering of Securities Act

The undersigned,

Ivan Angelov Angelov – Executive Director of Gradus AD

and

Antoaneta Nikiforova Boeva – Chief Accountant of Gradus AD

WE DECLARE, that to our knowledge:

1. The financial statements prepared in accordance with the applicable accounting standards give a true and fair view of the assets and liabilities, financial performance, and of the profit or loss of Gradus AD;

2. The interim management report contains a credible review of the state of affairs and operating performance of Gradus AD, together with a description of the main risks and uncertainties faced by the company.

28 January 2019

A. Boeva
/Chief Accountant/

I. Angelov
/Executive Director/