

DECLARATION

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

The undersigned,

Georgi Aleksandrov Babev - Executive Director of Gradus AD

Angel Ivanov Angelov – Chairman of the Board of Directors of Gradus AD

Antoaneta Nikiforova Boeva – Chief Accountant of Gradus AD

DECLARE HEREBY, that to the best of our knowledge:

(a) The set of consolidated financial statements covering the period January – June 2023. 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 the issuer and the companies included in the consolidation.

(b) The interim activity report contains information on significant events that occurred before the six months and their impact on the results in the financial statements, as well as a description of the main risks and uncertainties faced by the Group.

August 2023

A. Boeva
/Chief Accountant/

G. Babev
/Executive Director/

A. Angelov
/Chairman of the Board of Directors/