

ADDITIONAL INFORMATION

in accordance with Art. 33, para.1, i. 7 of Ordinance 2 of 17 September 2003
of Gradus AD at the end of IV quarter of 2019

1. **Information about the changes in the accounting policy during the reporting period, the reasons for their making and in what way they impact on the issuers financial result and equity** – there have been no changes in the accounting policy during the reporting period.
2. **Information about occurred changes in the economic group of the issuer if it participates in such group** - During the reporting period there were changes in the economic group of the issuer. Gradus AD acquires by acquisition 100% of the shareholdings of Gold Farm 91 EOOD.
3. **Information on the results from organizational changes within the issuer, such as transformation, selling of undertakings from the economic group, non-money contributions by the undertaking, renting out of property, long-term investments, suspension of operation** - there have been no organizational changes within the issuer.

The long-term investments in subsidiaries are with carrying amount:

Company	Country	31.12.2019		31.12.2018	
		Shareholding - BGN	Equity share %	Shareholding - BGN	Equity share %
Lora-2004 EOOD	Bulgaria	11 100	100	11 100	100
Zhyuliv EOOD	Bulgaria	16 200	100	16 200	100
Millennium 2000 EOOD	Bulgaria	35 700	100	35 700	100
Gradus-1 EOOD	Bulgaria	149 760	100	149 760	100
Gradus-98 AD	Bulgaria	52 200	99.94	52 200	99.94
Gold Farm 91 EOOD	Bulgaria	4 052	100	-	-
Total:		269 012		264 960	

4. **Opinion of the management body about the likelihood of realization of the published forecasts on the results of the current financial year, taking account of the results of the current quarter, as well as information about the factors and circumstances which will influence the obtaining of the forecast results at least for the next quarter** – forecasts have not been published.

5. **For the public companies - data about the persons holding directly and/or indirectly at least 5 per cent of the votes in the general meeting at the end of IV quarter of 2019, and the changes in the held by the persons votes for the period since the end of the preceding quarter**

	Shareholders	31.12.2019		31.12.2018	
		Number of shares	%	Number of shares	%
1	Luka Angelov Angelov	99 195 645	40,72	99 195 645	40,72
2	Ivan Angelov Angelov	50 312 465	20,65	99 195 645	40,72
3	Angel Ivanov Angelov	50 312 465	20,65	1 400 000	0,57
4	POK Doverie - indirectly	12 541 468	5,15	12 225 000	5,02
5	Legal entities - 68	25 751 287	10,57	25 909 878	10,63
6	Individual shareholders - 1 173	5 495 380	2,26	5 682 542	2,34
	TOTAL	243 608 710	100,00	243 608 710	100,00

6. For the public companies - data about the shares owned by the issuer's management and supervisory bodies at the end of IV quarter of 2019:

Name, father's name, family name	31.12.2019	31.12.2018
	Number of shares	Number of shares
Luka Angelov Angelov	99 195 645	99 195 645
Ivan Angelov Angelov	50 312 465	99 195 645
Georgi Alexandrov Babev	0	0

7. Information on pending legal, administrative or arbitration procedures relating to liabilities or receivables at the rate of at least 10 per cent from the issuer's equity; if the total amount of the issuer's liabilities or receivables of all initiated proceedings exceeds 10 per cent of its equity, information shall be presented for each procedure separately – there are no pending legal, administrative or arbitration procedures.

8. Information about granted by the issuer or its subsidiary loans, providing of guarantees or assuming liabilities in whole to one entity or its subsidiary, including also related persons with indication of the nature of the relations between the issuer and the entity, the amount of unpaid principal, interest rate, deadline for repayment, amount of the assumed liability, term and conditions – guarantees have not been provided and liabilities have not been assumed in whole to one entity or its subsidiary.

As of 31.12.2019. the short-term loans granted to the subsidiaries amount to BGN 38 841 000 under the following conditions

Loans amount	Interest rate %	Maturity date	Collateral	Loan to the 31.12.2019	Loan to the 31.12.2018
BGN '000					
„Gradus-1“ EOOD	0.86%	08-12.2020	No	16 650	19 400
„ Gradus -3“ AD	0.86%	07-12.2020	No	9 090	20 000
„Milenium 2000“ EOOD	0.86%	07.2020	No	-	5 000
„Lora-2004“ EOOD	0.86%	07.2020	No	10 601	11 000
„ Gradus -98“ AD	0.86%	12.2020	No	2 500	-
Total:				38 841	55 400

The purpose of the short-term loans granted is to support the development of existing and new business lines described in the Prospectus for Public Offering of Securities, as well as to finance operating activities.

28 January 2020
Gradus AD

Ivan Angelov
/Executive Director/

Luka Angelov
/Chairman of the Board of Directors/