

**ADDITIONAL INFORMATION**  
in accordance with Art. 33, para.1, i. 7 of Ordinance 2 of 17 September 2003  
of Gradus AD for the III quarter of 2020

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** – For the current financial year, the Group has adopted all new and revised standards and interpretations issued by the International Accounting Standards Board (IASB) and the Interpretations Committee of International Financial Reporting Standards (IFRIC).  
More information on the Group's accounting policy can be found in the disclosure of accounting policies and explanatory notes on the III quarter.
2. **Information about occurred changes in the economic group of the issuer if it participates in such group** - there have been no changes in the economic group of the issuer.
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	30.09.2020		31.12.2019	
		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		4 052	100	4 052	100
<b>Total:</b>		<b>269 012</b>		<b>269 012</b>	

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 III quarter of 2020, and the changes in the held by the persons votes for the period since the end of the preceding quarter**

	Shareholders	30.09.2020		31.12.2019	
		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	50 312 465	20,65
3	Angel Ivanov Angelov	50 312 465	20,65	50 312 465	20,65
4	POC Doverie - indirectly	12 824 503	5,26	12 541 468	5,15
5	Legal entities 69	25 259 008	10,38	25 751 287	10,57
6	Individual shareholders 1 181 per	5 704 624	2,34	5 495 380	2,26
	<b>TOTAL</b>	<b>243 608 710</b>	<b>100,00</b>	<b>243 608 710</b>	<b>100,00</b>

**6. For the public companies - data about the shares owned by the issuer's management and supervisory bodies at the end of III quarter of 2020:**

Name, father's name, family name	30.09.2020	31.12.2019
	Number of shares	Number of shares
Luka Angelov Angelov	99 195 645	99 195 645
Ivan Angelov Angelov	50 312 465	50 312 465
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.**

***Loans granted:***

The Group has provided loans to related and unrelated parties. Detailed information is available in the notes to the interim consolidated financial statements for the Q3 of 2020.

..... November 2020

GRADUS

Ivan Angelov  
/Executive Director/

Luka Angelov  
/Chairman of the Board of Directors/