

DECLARATION

in accordance to Article 100o of the Public Offering of Securities Act

The undersigned,

Ivan Angelov Angelov – Executive Director of Gradus AD

Luka Angelov Angelov – Chairman of the Board of Directors

and

Antoaneta Nikiforova Boeva – Chief Accountant of Gradus AD

DECLARE HEREBY, that to the best of our knowledge:

1 The set of interim consolidated financial statements as of December 31, 2021, prepared in accordance with the applicable accounting standards, accurately and fairly reflects the information on the assets and liabilities, financial condition and profit or loss of the Group Gradus;

2 The interim activity report for the fourth quarter of 2021 contains a reliable review of the information under Art. 100o, para 4, item 2 of POSA.

25 February 2022

A. Boeva
/Chief Accountant/

I. Angelov
/Executive Director/

L. Angelov
/Chairman of the Board of Directors/