

DECLARATION

in accordance to Article 100o¹, Para 2 and para 4 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:

The public notification for the financial condition of GRADUS GROUP AD as of 31.03.2022, accurately and honestly reflects the information on the assets and liabilities, financial condition and profit or loss of Gradus AD and the companies included in the consolidation.

27 May 2022

A. Boeva
/Chief Accountant/

I. Angelov
/Executive Director/

L. Angelov
/Chairman of the Board of Directors/