1.11	Details of the person discharge	ging managerial responsibilities/person closely associated
a)	Name	Donev Investments Holding AD
-,		[For physical persons: the first name and the last name(s).]
		[For legal persons: full name including legal form as provided for in the register where it is incorporated, if
2	Desses for the metilisetics	applicable.]
<u>v</u> .	Reason for the notification	
a)	Position/status	Based on the provisions of art.3, para 1, item 26, letter "g" of Regulation 596/2014 as a person closely
		associated.
		Ognian Donev is an Executive director and chairman of the Board of directors of Sopharma AD and chairman
		of the Board of directors of Donev Investments Holding AD
		[For persons discharging managerial responsibilities: the position occupied within the issuer, emission
		allowances market participant/auction platform/auctioneer/auction monitor should be indicated, e.g. CEO,
		[For persons closely associated,
		-An indication that the notification concerns a person closely associated with a person discharging managerial
		responsibilities;
		- Name and position of the relevant person discharging managerial responsibilities.]
b)	Initial notification/ Amendment	Initial notification
		[Indication that this is an initial notification or an amendment to prior notifications. In case of amendment,
		explain the error that this notification is amending.]
3.	Details of the issuer, emissior	n allowance market participant, auction platform, auctioneer or auction monitor
a)	Name	Sopharma AD
~)		[Full name of the entity.]
(h)		
b)	LEI	097900BGGW0000048796
		[Legal Entity Identifier code in accordance with ISO 17442 LEI code.]
4.		section to be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and (iv) each
	place where transactions hav	e been conducted
a)	Description of the financial	Shares, ISIN № BG11SOSOBT18
	instrument, type of instrument Identification code	Indication as to the nature of the instrument
		 a share, a debt instrument, a derivative or a financial instrument linked to a share or a
		debt instrument;
		 an emission allowance, an auction product based on an emission allowance or a
		derivative relating to an emission allowance.
		Instrument identification code as defined under Commission Delegated Regulation supplementing Regulation
		(EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standard
		for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No
		600/2014.
b)	Nature of the transaction	Buy
		[Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the
		Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No
		596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.
		Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is
<u></u>	Price(c) and volume(c)	
c)	Price(s) and volume(s)	Price(s) volume(s) 5.72 2 49
		5.80 50
		5.72 2 00
		5.72 17
		5.72 17
		5.72 17
		5.72
		5.72 17
		5.72 17
		[Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on the same
		[Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on the same financial instrument or emission allowance are executed on the same day and on the same place of transaction,
		[Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on the same financial instrument or emission allowance are executed on the same day and on the same place of transaction, prices and volumes of these transactions shall be reported in this field, in a two columns form as presented
		[Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on the same financial instrument or emission allowance are executed on the same day and on the same place of transaction,
		[Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on the same financial instrument or emission allowance are executed on the same day and on the same place of transaction, prices and volumes of these transactions shall be reported in this field, in a two columns form as presented above, inserting as many lines as needed.
		[Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on the same financial instrument or emission allowance are executed on the same day and on the same place of transaction, prices and volumes of these transactions shall be reported in this field, in a two columns form as presented above, inserting as many lines as needed. Using the data standards for price and quantity, including where applicable the price currency and the quantity
		[Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on the same financial instrument or emission allowance are executed on the same day and on the same place of transaction, prices and volumes of these transactions shall be reported in this field, in a two columns form as presented above, inserting as many lines as needed. Using the data standards for price and quantity, including where applicable the price currency and the quantity currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of
		[Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on the same financial instrument or emission allowance are executed on the same day and on the same place of transaction, prices and volumes of these transactions shall be reported in this field, in a two columns form as presented above, inserting as many lines as needed. Using the data standards for price and quantity, including where applicable the price currency and the quantity currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of
		[Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on the same financial instrument or emission allowance are executed on the same day and on the same place of transaction, prices and volumes of these transactions shall be reported in this field, in a two columns form as presented above, inserting as many lines as needed. Using the data standards for price and quantity, including where applicable the price currency and the quantity currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of
		[Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on the same financial instrument or emission allowance are executed on the same day and on the same place of transaction, prices and volumes of these transactions shall be reported in this field, in a two columns form as presented above, inserting as many lines as needed. Using the data standards for price and quantity, including where applicable the price currency and the quantity currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of
		[Where more than one transaction of the same nature (purchases, sales, lendings, borrows,) on the same financial instrument or emission allowance are executed on the same day and on the same place of transaction, prices and volumes of these transactions shall be reported in this field, in a two columns form as presented above, inserting as many lines as needed. Using the data standards for price and quantity, including where applicable the price currency and the quantity currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of

NOTIFICATION OF INSIDERS' TRANSACTIONS under art. 19 of Regulation 596/2014

		5.73 5175
		[The volumes of multiple transactions are aggregated when these transactions:
	– Aggregated volume –	 relate to the same financial instrument or emission allowance;
	Price	— are of the same nature;
		 are executed on the same day; and
		 are executed on the same place of transaction.
		Using the data standard for quantity, including where applicable the quantity currency, as defined under
		[Price information:
		 In case of a single transaction, the price of the single transaction;
		 In case the volumes of multiple transactions are aggregated: the weighted average price of the aggregated
		Using the data standard for price, including where applicable the price currency, as defined under Commission
e)	Date of the transaction	20.12.2024
		[Date of the particular day of execution of the notified transaction.
		Using the ISO 8601 date format: YYYY-MM-DD; UTC time.]
f)	Place of the transaction	BSE AD
		[Name and code to identify the MiFID trading venue, the systematic internaliser or the organised trading
		if the transaction was not executed on any of the above mentioned venues, please mention 'outside a trading