



POLICY ON THE PROVISION AND DISSEMINATION OF INFORMATION

I. GENERAL PROVISIONS

The corporative management of Stara Planina Hold Plc ensures prompt and correct announcement on all significant matters related to the company activity. The announcement includes substantial information about the financial and operation results, as well as about the material major risks and uncertainties in the activities of the holding and the economic group, the shareholders majority ownership, the capital structure and agreements which result in control exercising, information about the shareholders' rights, including of voting rights, information about the members of the Board of Directors..

Stara Planina Hold Plc carries out its activity in compliance with the principles and provisions of the National Code for Corporate Governance and implements the current policy as an integral element of the Code requirements.

The policy on the provision and dissemination of information is based on the rule for equal attitude towards the shareholders.

Stara Planina Hold Plc provides the interested parties with the necessary information about the activity of the company, current data on the financial condition and anything that may help for the adequate orientation of the said and their decision-making.

Stara Planina Hold Plc is committed to disclose to the public the regulated information in a way which ensures the widest and simultaneous dissemination to widest possible number of people in all Member States and in a way which does not discriminate any of them.

II. INFORMATION FOR SHAREHOLDERS AND INVESTORS

Stara Planina Hold Plc attaches great importance to the receipt of comprehensive and prompt information about the General Meeting of Shareholders, including information about the date, time and place, the agenda of the General Meeting, specific proposals for resolutions on each item of the agenda as well as information on the voting procedure for the shareholders.

Media

Stara Planina Hold Plc announces the regulated information to the public in a way which ensures that it reaches at the same time the widest possible circle of people in a non-discriminating manner. This is done by media which ensure the effective dissemination of announced information. Media are published on the webpage of Stara Planina Hold Plc. Stara Planina Hold Plc does not assume responsibility for systemic errors or shortcomings in the media to which the regulated information has been communicated.

General Meeting of Shareholders

The materials for the meeting shall be announced in a special section on the website of Stara Planina Hold Plc and published in selected media. They shall also provide the Financial Supervision Commission and Bulgarian Stock Exchange - Sofia AD. When the agenda includes election of members of the Board of Directors, materials shall include also data on the names, permanent addresses and professional qualification of the proposed persons. Starting on the date of promulgation of the written notice for the General Meeting, the shareholders shall have the opportunity to familiarize themselves with the materials for the General Meeting also in the office of the company, every business day

from 10 AM to 4 PM. Upon request, the written materials can be submitted to any shareholder free of charge.

During the General Meeting any shareholders shall have the opportunity to ask the management of the holding questions, regardless of whether these are related to the agenda or not. The members of the Board of Directors of the company shall be obliged to answer truly, comprehensively and to the point of the shareholders' questions related to the business and financial condition as well as the commercial activity of the company, except with regard to circumstances which represent internal information.

All interested parties may receive on a daily basis information on the price of the shares of the holding and its subsidiaries and affiliated companies which are public companies via the internet page of the company, via the specialized daily and periodical editions, via the specialized internet sites and via the site of the Bulgarian Stock Exchange.

The webpage of Stara Planina Hold Plc www.sphold.com/en contains various and useful information about the shareholders, the investors and all stakeholders. In a special section are published the materials for the general shareholders' meeting and subsequently - the minutes from the meetings, including of detailed information on dividends payment when a resolution is adopted therefor.

The webpage can provide comprehensive and detailed financial information, reports on the activities of the Board of Directors are published therein, as well as the Articles of Association of the company and internal normative documents, the reports of the Audit Committee and of the Investor Relations Director. Information about the members of the Board of Directors is published, as well as about the portfolio of Stara Planina Hold Plc, the subsidiaries and the price of the shares of the public companies within the holding's economic group. On the webpage of Stara Planina Hold Plc the shareholders can receive information about their rights, the dividends and about the way in which their shares are sold, as well as to find answers to frequently asked questions. They can use standard forms and samples of requests for dividends receiving, powers for attorney for dividends receiving and powers of

attorney for attending the general shareholders' meeting. There is an option for communication with every interested person which is provided through a window for questions and answers.

The webpage is maintained in Bulgarian and English.

Stara Planina Hold PLC carries out consistent open doors policy. Shareholders, potential investors and interested persons can directly communicate with the Investor Relations Director and with the other employees of the holding.

Stara Planina Hold PLC is registered as and administrator protecting personal data within the meaning of the Personal Data Protection Act. Where necessary, shareholders provide their personal data in accordance with the requirements of the Public Offering of Securities Act and Commerce Act. Data are used only for purposes specified in the said acts. Each person is entitled to access her/her personal data. Provided personal data are processed and stored on an electronic and paper media and are dully protected by reliable methods and means. Stara Planina Hold PLC does not modify and disclose the personal data of its shareholders and does not provide the collected information to third parties except in the cases provided in the legislation. Stara Planina Hold PLC does not provide personal data for the purpose of direct marketing campaigns.

III. DISCLOSURE OF NON-REGULATED INFORMATION

Stara Planina Hold PLC periodically discloses information before the Financial Supervision Commission and the investment circles.

The company submits an interim financial statement for the first half of the year and an annual financial statement.

After the first, second and fourth quarter Stara Planina Hold Plc presents a public notification for the financial condition of the company.

After it summarizes the financial results of the subsidiaries, the holding accordingly presents consolidated statements and notifications.

Each statement or notification is accompanied by a report on the company's activities in the respective period.

The above documents are prepared on the basis of reporting information which contains:

1. Information on significant events which have occurred from the beginning of the financial year to the end of the respective reporting period and on their effect on financial results.

2. Opinion on the possibilities for realization of published forecasts, including of information on factors and circumstances which will help for achieving the results forecast.

3. Description of major risks and uncertainties posed on the company or economic group during the rest of the financial year.

4. Information on share price movements

5. Information on related and/or interested party transactions

6. Information on new significant receivables and/or debts for the reporting period.

7. Additional information required by law.

Stara Planina Hold Plc publishes on a monthly basis through media and on its webpage its provisional financial results (on a consolidated basis) and the financial results of the major enterprises in the holding portfolio, as well as sales forecasts.

The documents of Stara Planina Hold Plc under this section contain information on the possibilities for realization of published forecasts, forecasts for future periods and information representing inside information under Article 7 of Regulation (EU) No 596/2014 on market abuse. Such information would be likely to have a significant effect on the prices of shares issued by the company.

The company discloses information also on a number of other circumstances, as provided by law, upon their occurrence. Particular attention is paid to inside information within the meaning of Article 7 of Regulation (EU) No 596/2014 on market abuse. This is information of a precise nature, which has not been made public, relating,

directly or indirectly, to one or more issuers or to one or more financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments. Stara Planina Hold Plc publishes internal information on its internet site.

Stara Planina Hold Plc guarantees that the information published on the internet site is identical in contents to the information provided to the regulatory bodies and the public.

Investor Relations Director is obliged to ensure prompt and truthful disclosure of the information on the activity of the company in compliance with the legislation. The company prepares and maintains an updated calendar of the corporate events, including all due communications by the company which it must provide to the competent authorities. The corporate events calendar is published on the internet site of the company.

IV. PROVISION OF INFORMATION AND INTERACTION WITH INSTITUTIONAL INVESTORS, INVESTMENT FIRMS AND THE REGULATED MARKET

The Management of Stara Planina Hold Plc provides complete information and interaction between the company and its shareholders, which are institutional investors, between the company and Bulgarian Stock Exchange – Sofia Plc, which is a regulated market of financial instruments, and between the company and the investment firms on this market.

When an investment firm is chosen, the Board of Directors considers to what extent the actions of the investment firm are based on market information and principles.

The Management of the holding delivers to its investment firms and institutional investors the corporate governance policy and practices of the company and seeks their agreement on such policy and practices, if necessary.

Stara Planina Hold Plc requires disclosure and limiting of conflicts of interest from all parties which are bound by contract to provide the company with consultations and analyses.

If the company requests admission of financial instruments to trading on a regulated market within a jurisdiction which is different from the one where the company was established, it undertakes to disclose information on the rules of corporate governance applicable in such jurisdiction.

V. PROVISION OF INFORMATION OF THE SPECIALIZED ECONOMIC MEDIA

The management of Stara Planina Hold PLC realizes that presentation in the specialized economic editions is beneficial to the good corporative image of the company, it improves shareholders' awareness, widens the scope of investors and interested parties, promotes the enterprises of the holding and the production manufactured by them.

Stara Planina Hold PLC guarantees that the information provided to the financial journalists shall be accurate, precise and authentic.

Investor Relations Director is a major linking unit between the management of the company and its shareholders, investors and the specialized economic media. It ensures the comprehensive implementation of the policy on the relations with the economic editions and other media, contacts them directly, and announces information on the condition and plans of the company.

The members of the Board of Directors shall provide the necessary volume of public information and shall assist the Investor Relations Director in the performance of his/her activity.

When providing information, there shall be observed the principles of trade secret protection, the obligation for simultaneous disclosure and non-admittance of trade with internal information and manipulation of the financial instruments market.

The Policy was adopted by the Board of Directors on 30.10.2007 and it were amended and supplemented on 15.02.2017.