

**INFORMATION DISCLOSURE POLICY  
OF  
OF INFORMATION SERVICES JSC**

**I. GENERAL PROVISION**

1. This Policy sets out the scope of information subject to disclosure by Information Services JSC in its capacity as a business company, which is a public company within the meaning of the Law on Public Companies.
2. The Company discloses and provides easy access to financial and non-financial information, including financial position, achievement of objectives and management structure.
3. The Disclosure Policy complies with and is applied in accordance with the effective regulatory requirements in the Republic of Bulgaria, including the Law on Public Companies, the Implementing regulation of the Law on Public Companies, the Law on Accountancy, the Law on Independent Financial Audit, the Law on Commerce and its implementing regulations, the Law on Personal Data Protection and the relevant internal rules of the Company.

**II. PURPOSE AND PRINCIPLES**

4. The purpose of this Policy is to outline the framework for the provision of information to stakeholders in order to enable objective and informed decision making and assessments.
5. When disclosing information, the Company shall be guided by the principles of:
  - 5.1. Accuracy;
  - 5.2. Accessibility;
  - 5.3. Equality;
  - 5.4. Timeliness;
  - 5.5. Integrity;
  - 5.6. Regularity.
6. Information Services JSC shall disclose material information regardless of its nature, in compliance with the principle of equal treatment of addressees.
7. In certain cases, under applicable law or rules, disclosure of certain information shall not be permitted. This is the case where:
  - 7.1. this leads to the violation of a law or other regulation;
  - 7.2. the information is confidential or relates to negotiations in progress;
  - 7.3. the information constitutes a business or commercial secret (confidential information);

7.4. this leads to the disclosure of personal data and special categories of personal data.

### **III. INFORMATION CHANNELS**

8. For the purpose of information disclosure, Information Services JSC shall use the following channels:

8.1. Corporate website [www.is-bg.net](http://www.is-bg.net) with established content, scope and frequency of information disclosed through it;

8.2. Other channels, including the media; the websites of: the Agency for Public Companies and Control (APCC), the Ministry of Transport, Information Technology and Communications (MTITC) and the Commercial Register and the Register of Non-Profit Legal Entities, where information is published accordingly.

### **IV. INFORMATION**

9. The information disclosed by Information Services JSC include, but is not limited to:

9.1. Articles of Association;

9.2. Information on the management of the company;

9.3. Risk Management Strategy;

9.4. Annual financial statements certified by registered auditor(s);

9.5. Interim (quarterly) financial statements;

9.6. Report and self-assessment questionnaire on the state of financial management and control systems prepared in accordance with the Law on Financial Management and Control in the Public Sector.

10. The Company's financial statements are prepared in line with the International Accounting Standards as required by applicable law. The audited financial statements are submitted to the MTITC and the APCC.

11. Information Services JSC prepares an Annual Business reports, which is subject to review by a registered auditor(s) and contains detailed information on:

11.1. Management of the company;

11.2. An objective review that presents faithfully and fairly the development and performance of the Company and its condition;

11.3. Analysis of financial and non-financial key performance indicators relevant to the business;

11.4. Main risks faced by the company;

11.5. Organizational structure, staff and staff income;

- 11.6. All significant events that occurred after the date on which the annual financial statements were prepared;
- 11.7. R&D activities;
- 11.8. Information about branches of the Company;
- 11.9. Information on the acquisition of own shares required under article 187e of the Law of Commerce;
- 11.10. Financial instruments used by the Company;
- 11.11. Quality management systems;
- 11.12. Development, main objectives and intentions of the company.
- 12. The information shall be disclosed subject to the conditions and time limits laid down in the relevant regulatory act.
- 13. The following persons are responsible for the disclosure of the information:
  - 13.1. for the disclosure of information in the Commercial Register and the Register of Non-Profit Legal Entities - the CEO of Information Services JSC;
  - 13.2. for the disclosure of information through the Agency for Public Companies and Control (APCC), the Ministry of Transport, Information Technology and Communications (MTITC) - the Chief Accountant of Information Services JSC and the Head of Legal Department;
  - 13.3. for the disclosure of information on the corporate website of the company - the CEO of Information Services JSC.

## **V. ADDITIONAL PROVISIONS**

§1. In the meaning of this Policy:

Internal information	Precise information that has not been made publicly available, relating directly or indirectly to the Company, and if made public, could have a material effect.
Essential information	Information the omission or misrepresentation of which could alter or influence the assessment or decision of a user relying on that information.
Trade secret	Information the disclosure of which would prejudice the competitive position of the Company. It may include information about products or systems whose sharing with competitors would reduce the value of the Company's investment in them.
Confidential information	Information where there are commitments to customers or other relationships with counterparties under which the Company must keep that information confidential.

Interested parties

Persons having an interest in the economic development of the company such as the Company's principal, creditors, customers, employees, the public and others.

## **VI. FINAL PROVISIONS**

§2. The Policy is publicly available on the Company's corporate website at: [www.is-bg.net](http://www.is-bg.net).

§3. This Policy shall be reviewed annually or more frequently if need be.

§4. Pursuant to article 63, paragraphs 1 and 3 of the Implementing regulation of the Law on Public Companies, this Policy has been adopted by the Board of Directors of Information Services JSC by resolution under item 1 of Minutes No 280 dated 22.10.2021.