



Information Communication and Disclosure Policy

Of Industrial Holding Bulgaria PLC

General Provisions

Corporate governance of Industrial Holding Bulgaria PLC (IHB AD, the company) shall ensure the timely and precise disclosure of all significant matters concerning the company's activity. Disclosure shall include significant information about the company's financial performance and operating results, majority shareholding ownership and voting rights, information about the members of the Management and Supervisory Boards, significant risks, management structure and policies.

IHB AD carries out its activity in compliance with the principles and provisions of the National Corporate Governance Code and applies this policy as an integral component of the requirements of the Code.

Information Communication and Disclosure Policy is implemented on the basis of equality of treatment of all shareholders.

IHB AD shall provide all stakeholders with any relevant information they might need about the company's activity, as also with up-to-date data of its financial performance and any other data that could facilitate their better orientation and the decision-making process.

IHB AD has committed itself to disclose the regulated information to the public and stakeholders in a way that guarantee its widest and simultaneous disclosure to the largest possible audience in all EU Member States and in a neutral manner that does not discriminate them.

Information Disclosed to Shareholders and Investors

IHB AD attaches the highest importance to obtaining full and timely information about the General Meeting of Shareholders, including information about the date, hour and venue of the General Meeting, specific drafting proposals related to the proposed decisions on agenda items, information about the procedures for the exercise of the shareholder's voting right.

The company shall submit the materials for the meeting to the Financial Supervision Commission and Bulgarian Stock Exchange - Sofia AD no later than 30 days prior to the date of the General Meeting. Where the agenda provides for the election of members of the Supervisory Board, the materials shall include also data of their names, permanent address and professional qualification. From the date of notification and dispatch of the invitation, the shareholders may examine at the company's office the materials for the General Meeting, every working day from 9.00 a.m. to 5 p.m. On request, the written materials shall be provided to each shareholder free of charge.

In the course of the General Meeting each shareholder may put questions to the company's management whether related to the agenda or otherwise. The members of the Management and Supervisory Boards of the company are obliged to respond correctly, exhaustively and in substance to the questions of the shareholders regarding the economic and



financial position and commercial activities of the company, except for circumstances constituting inside information.

All stakeholders may be provided on a daily basis with information about the price of the company's share at the website of Bulgarian Stock Exchange: <http://www.bse-sofia.bg> – Trade Date – Current Session.

The website of IHB AD, www.bulgariaholding.com, contains diverse and useful information intended to shareholders, investors and stakeholders, such as financial data, the company's Articles of Association and in-house regulations, reports of the Investor Relations Director, data of the members of the Management and Supervisory Boards, the portfolio of IHB AD. The shareholders are able to ascertain their rights and to obtain useful information about the dividends and the technique used for selling their shares. There are also contact details of the Investor Relations Director, whom the shareholders, investors and all stakeholders may address on various matters, as also a contact e-mail address: ir@bulgariaholding.com.

IHB AD is registered as a personal data controller in the sense of the Personal Data Protection Act. If required, the shareholders shall provide their personal data in compliance with the requirements of the Public Offering of Securities Act and the Commercial Act. Data is to be used only for purposes stipulated in the above laws. Each person shall have the right of access to his/her personal data. The so-provided personal data is processed and stored on an electronic data medium and on paper, and is protected appropriately by employing reliable methods and means. IHB AD neither changes nor discloses personal data of its shareholders or discloses collected information to third parties, save as otherwise provided in a law. IHB AD does not provide personal data for the purposes of direct marketing campaigns.

Disclosure of Regulated Information

IHB AD periodically discloses information to the Financial Supervision Commission and investment society, by providing annual and half-yearly reports, and quarterly notifications of its financial performance, on separate and consolidated bases.

The company submits to the Financial Supervision Commission and Bulgarian Stock Exchange - Sofia AD all invitations to General Meetings of Shareholders, accompanied by the relevant agenda materials in writing, and subsequently, the minutes of the meetings, including detailed information for payment of dividends, when such a decision was taken.

The company discloses information about a number of other statutory circumstances upon their occurrence. Importance is therefore attached to the inside information in the sense of article 7 of Regulation (EO) No 596/2014 of the European Parliament and of the Council on market abuse (Market Abuse Regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC. Inside information shall comprise 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. IHB AD publishes, at the earliest opportunity, inside information that affects it directly. The company publishes inside information at its website, after it has been made public.

IHB AD employs suitable media to communicate regulated information to the investment society, in unedited full text, in a manner, which ensures the security of the



communication, minimises the risk of data corruption and unauthorised access, and provides certainty as to the source of the regulated information. IHB AD shall not be responsible for systemic errors or shortcomings in the media to which the regulated information has been communicated.

The Investor Relations Director is obliged to ensure the timely and faithful disclosure of operating information of the company in compliance with the legal requirements. The company shall prepare and maintain an up-to-date Financial Calendar of all corporate events, including all notifications due, which shall be announced. The Financial Calendar shall be published at the company's website.

Communication of information to specialist business media

Management of IHB AD is aware that the communication of information to specialist business press has beneficial impact on the good corporate image of the company, improves the shareholders' awareness and expands the range of investors and stakeholders.

IHB AD guarantees that the information provided to financial journalists is correct, precise and reliable.

The Investor Relations Director acts as the main liaison between the company's management and its shareholders, investors and specialist business media. He/she implements the overall policy regarding the relationships with business press and other media, contacts directly with them, and discloses information about the company's position and plans.

The members of the Management and Supervisory Boards provide the required volume of information and fully support the Investor Relations Director in his/her activity.

When information is made available, the principles of protection of business secrecy and the engagement for simultaneous disclosure and avoiding insider dealing and manipulation of markets in financial instruments are strictly observed.

This Policy has been updated by decision of the Management and Supervisory Boards of Industrial Holding Bulgaria PLC dated 24 October 2016.