

I N V I T A T I O N

The Management Board of “TRACE GROUP HOLD” Plc, a company registered in Commercial Register at Registry Agency, having UIC 123682269, with headquarters in Sofia, 12 Nikola Obrazopisov Str., by virtue of Art. 223 of the Commercial Law in connection to Art. 115 of the Law on Public Offering of Securities, CALLS EXTRAORDINARY GENERAL MEETING OF THE SHAREHOLDERS on November 6, 2020, which will take place in Sofia, “Triaditsa” District, 12 Nikola Obrazopisov Str., at 11:00 a.m. Eastern European Summer Time (EEST) or at 09:00 a.m. Coordinated Universal Time (UTC), with the following agenda:

1. Adoption of a Remuneration Policy for the members of the Supervisory Board and for the members of the Management Board of “TRACE GROUP HOLD” Plc, developed by the Supervisory Board of the Company in accordance with Ordinance № 48 dated on 20.03.2013 on the remuneration requirements issued by the Chairman of the Financial Supervision Commission, promulgated, State Gazette no. 32 dated on 2.04.2013, amendments and additions, no. 41 dated on 21.05.2019, amended, no. 66 dated on 20.08.2019, amendments and additions no. 61 dated on 10.07.2020.

Draft decision: The Extraordinary General Meeting of the Shareholders adopts the Remuneration Policy for the members of the Supervisory Board and for the members of the Management Board of “TRACE GROUP HOLD” Plc, developed by the Supervisory Board of the Company in accordance with Ordinance № 48 dated on 20.03.2013 on the remuneration requirements issued by the Chairman of the Financial Supervision Commission, promulgated, State Gazette no. 32 dated on 2.04.2013, amendments and additions, no. 41 dated on 21.05.2019, amended, no. 66 dated on 20.08.2019, amendments and additions no. 61 dated on 10.07.2020.

The unique identification code of the event is BGT5720201117TRACE.

The ISIN code shares issue of “TRACE GROUP HOLD” Plc, UIC 123682269, is BG1100049078.

The Management Board of “TRACE GROUP HOLD” PLC invites all shareholders to attend in person or through their authorized representatives at the convened Extraordinary General Meeting of shareholders.

Pursuant to Art. 115 b, Paragraph 1 of the Law on Public Offering of Securities voting rights on the Extraordinary General Meeting have the persons entered in the registers of the Central Depository as shareholders as of 23.10.2020 - 14 days before the date of the Extraordinary General Meeting. The total number of shares issued by the Company is 24,200,000 (twenty-four million two hundred thousand) ordinary dematerialized shares, each one with a nominal value of 1 (one) BGN, of which 24,193,721 shares having voting rights, and 6,279 own shares. Each of the shares having

voting rights entitles the shareholder to participate and vote with one vote at the Extraordinary General Meeting of the Shareholders. The total number of votes in the Extraordinary General Meeting is 24,193,721 (twenty-four million one hundred ninety-three thousand seven hundred and twenty-one).

The shareholders have the right to make proposals for decisions on issues included in the agenda until the deliberations on the item concerned have been completed. They may raise questions during the General Meeting, including on the economic, financial and commercial activities of the company, no matter whether those questions are related to the agenda, except regarding circumstances that are inside information. The shareholders who hold shares representing more than 5% of the company's capital for more than 3 months may include issues in the agenda of the Extraordinary General Meeting. They can perform this right by the order of Art. 223a of the Commercial Law not later than 15 days before the opening of the meeting, submitting in the Commercial Register a list of the questions that they wish to be included as well as proposals for decisions. With the announcement in the Commercial Register, the issues are considered included in the proposed agenda. At the latest on the next working day following the announcement, the shareholders shall submit the list of questions, the proposals for decisions and the written papers to the registered office and headquarters of the company as well as to the Financial Supervision Commission. The deadline for exercising the shareholders' right under Art. 223a of the Commercial Law is 22.10.2020.

The Shareholders have the right to make substantive proposals for decisions on any item included in the agenda and in compliance with the requirements of the law, the limit under Art. 118, paragraph 3 of the Public Offering of Securities Law shall apply accordingly; the deadline for the exercise of this right is until the end of the debate on the respective item before voting for a decision by the Extraordinary General Meeting.

Voting by correspondence and electronic means is not applicable.

The registration of the shareholders on the day of the Meeting begins at 10:00 a.m, at the place where it will be held.

The shareholders legal entities shall be represented by their legal representatives, which are legitimated by submission of a certificate for current juridical registration, respectively current certificate for registration in the Commercial Register of the legal entity or other equivalent document for foreign shareholders - legal entities and identity document.

The individual shareholders shall identify themselves by presenting an identity document.

The shareholders have the right to authorize any individuals or legal entities to participate and vote in the Extraordinary General Meeting on their behalf in compliance with Art. 220, paragraph 1 of the Commercial Law in relation to Art. 115g, paragraph 1 of the Law on Public Offering of Securities. According to Art. 116, paragraph 4 of the Law on Public Offering of Securities the re-authorization with the

rights listed above is negligible. The authorized individuals or legal entities shall be legitimized by presenting an identity document and an explicit written power of attorney drawn up in accordance with a template attached to the documents for the Extraordinary General Meeting of the Company, with a notary certification of the signature.

Terms and conditions for obtaining power of attorney by electronic means: a power of attorney might be submitted by the authorized person at the time of registration or to be sent at least one day before the date of the Extraordinary General Meeting at the company email address tracegroup@tracebg.com. In cases when the power of attorney is sent by e-mail it is necessary to be scanned in pdf format and to be received at latest by 17:00 p.m. on the day preceding the Meeting.

“Trace Group Hold” Plc will receive and accept as valid also notifications and power of attorney by email, received at tracegroup@tracebg.com, as the digital messages shall be signed by universal digital signature by the authorizer and they shall comprise an attached electronic document (electronic image) of the power of attorney, which shall be also signed by a universal digital signature by the authorizer.

The current status certificates and powers of attorney for attendance in the Extraordinary General Meeting of the Shareholders issued in a foreign language must be accompanied by a legalized translation into Bulgarian language. In case of a discrepancy between the texts, the text in Bulgarian language shall prevail.

The written documents on the agenda and the draft power of attorney for representation of a shareholder in the Extraordinary General Meeting shall be available to the shareholders in accordance with Art. 224 of the Commercial Law at the office of “TRACE GROUP HOLD” Plc at address: Sofia, Triaditsa District, 12 "Nikola Obrazopisov" Str., every working day from 9:00 a.m. to 17:30 p.m., as well as on the website of the company www.tracebg.com. The documents may be obtained by hand or downloaded from the company's website.

In case of an absence of a quorum on the grounds of Art. 227, paragraph 3 of the Commercial Law the Extraordinary General Meeting shall be held regardless of the represented capital on 24.11.2020 at 11:00 a.m. Eastern European Summer Time (EEST) or at 09:00 a.m. Coordinated Universal Time (UTC), in the same place and on the same agenda.