



## CONCENTRATED STATEMENT FOR THE FREE FLOAT OF THE SHARE CAPITAL OF COMPANY:

## RichReach Corporation Public Ltd

AS AT 31<sup>st</sup> of December 2019

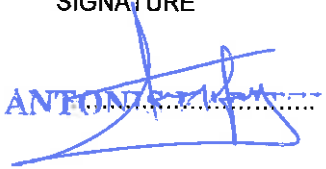
A.	Bodies of Administration - Management and Surveillance [(Article 137(3))]	Total number of shares	Percentage of the total number of shares	Trading Code / Trading Account
1.	Chairman of the Board ANTONIS KARITZIS	12,500	0.111%	
2.	Members of the Board (Names)			
2.1	GEORGE ROUSOU	53,959	0.480%	
2.2	CHRISTAKIS IERIDES	22,334	0.199%	
2.3	EPAMINONDAS METAXAS	0	0.000%	
2.4	GEORGIOS KOUFARIS	0	0.000%	
3.	General Manager			
4.	Financial Manager			
5.	Head of Accounting Department			
6.	Secretary			
7.	Auditors (names of partners/ employees)			
8.	Buy Back			
9.	Employees Provident Funds (Names of funds)			
B.	Major Shareholders (over 5%)			
B.1	3L TRANSCENDENT INVESTMENTS LTD	8,242,877	73.291%	
B.2	COEUR DELION SOFTWARE ENGINEERING LTD	2,184,986	19.428%	
	TOTAL	10,516,656	93.508%	
C.	Company Employees	6,396	0.057%	
	FREE FLOAT TO THE PUBLIC	723,726	6.435%	
	TOTAL NUMBER OF LISTED SHARES	11,246,778	100.000%	

Position	NAME – SURNAME	SIGNATURE	DATE
Chairman	ANTONIS KARITZIS	 ANTONIS KARITZIS	08/01/2020
Secretary	KARANTO SECRETARIAL LTD	 KARANTO SECRETARIAL LTD ANTONIS KARITZIS Director of the Secretary	08/01/2020

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**CONCENTRATED ELEMENTS OF THE FREE FLOAT OF THE SHARE CAPITAL OF THE COMPANY**

A.	Market in which the securities of the company are listed	EMERGING COMPANIES MARKET (ECM) OF THE CSE	
B.	Information:	Number of Persons	Number of Persons
B.1	Natural Persons	19	24
B.2	Legal Persons	5	
B.3	Total (B1 + B2)		
B.4	Members of the Board of Directors	3	
	i. Directly	3	
	ii. Through persons who hold shares in their name, but for the account of every Member of the Board		
	iii. Through undertakings controlled by every Member of the Board	.....	
	iv. Through persons acting in concert with every Member of the Board	.....	
B.5	Major shareholders over 5%	2	( 5 )
B.6	Total (B4 + B5)		
C.	TOTAL (B3 – B6)		19


Position	NAME - SURNAME	SIGNATURE	DATE
CHAIRMAN	ANTONIS KARITZIS		08/01/2020

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FREE – FLOAT OF THE SHARE CAPITAL OF THE COMPANY: **RichReach Corporation Public Ltd**

AS AT 31<sup>st</sup> of December 2019

A.	Bodies of Administration – Management and Supervision [[Article 137(3)]]	Total number of shares	Percentage to the total number of shares	Trading Code / Trading Account
1.	Chairman of the Board Name : <i>ANTONIS KARITZIS</i>			
I.	Directly	12,500	0.111%	
II.	Through persons holding shares in their name but for the account of the above mentioned person (names)			
III.	Through undertakings controlled by the abovementioned person (names)			
IV.	Through persons acting in concert with the abovementioned person (names)			
	<b>TOTAL</b>	<b>12,500</b>	<b>0.111%</b>	

Position	NAME – SURNAME	SIGNATURE	DATE
CHAIRMAN	ANTONIS KARITZIS	 <b>ANTONIS KARITZIS</b>	<u>08/01/2020</u>

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		Total number of shares	Percentage to the total number of shares	Trading Code / Trading Account
2.1	Member of the Board Name : <i>GEORGE ROUSOU</i>			
I.	Directly	53,959	0.480%	
II.	Through persons holding shares in their name but for the account of the above mentioned person (names)			
III.	Through undertakings controlled by the abovementioned person (names)  Coeur DeLion Software Engineering Ltd	2,184,986	19.428%	
IV.	Through persons acting in concert with the abovementioned person (names)			
	<b>TOTAL</b>	<b>2,238,945</b>	<b>19.907%</b>	

Note: Complete the number of forms as are required for every member of the board giving the appropriate numbering 2.1, 2.2, 2.3 etc (place the second numeral after the number 2 in the above form).

Position	NAME – SURNAME	SIGNATURE	DATE
DIRECTOR	GEORGE ROUSOU	<i>George Rousou</i>	<i>08/01/2020</i>

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		Total number of shares	Percentage to the total number of shares	Trading Code / Trading Account
2.2	Member of the Board Name : <i>CHRISTAKIS IERIDES</i>			
I.	Directly	22,334	0.199%	
II.	Through persons holding shares in their name but for the account of the above mentioned person (names)			
III.	Through undertakings controlled by the abovementioned person (names)			
IV.	Through persons acting in concert with the abovementioned person (names)			
	<b>TOTAL</b>	<b>22,334</b>	<b>0.199%</b>	

Note: Complete the number of forms as are required for every member of the board giving the appropriate numbering 2.1, 2.2, 2.3 etc (place the second numeral after the number 2 in the above form).

Position

NAME – SURNAME

SIGNATURE

DATE

DIRECTOR


CHRISTAKIS IERIDES

8/1/2020

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		Total number of shares	Percentage to the total number of shares	Trading Code / Trading Account
2.3	Member of the Board Name : EPAMINONDAS METAXAS			
I.	Directly	0	0.000%	
II.	Through persons holding shares in their name but for the account of the above mentioned person (names)			
III.	Through undertakings controlled by the abovementioned person (names)			
IV.	Through persons acting in concert with the abovementioned person (names)			
	TOTAL	0	0.000%	

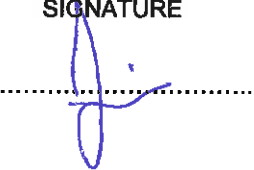
Note: Complete the number of forms as are required for every member of the board giving the appropriate numbering 2.1, 2.2, 2.3 etc (place the second numeral after the number 2 in the above form).

Position	NAME – SURNAME	SIGNATURE	DATE
DIRECTOR	EPAMINONDAS METAXAS		21/1/20

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		Total number of shares	Percentage to the total number of shares	Trading Code / Trading Account
2.4	Member of the Board Name : GEORGIOS KOUFARIS			
I.	Directly	0	0.000%	
II.	Through persons holding shares in their name but for the account of the above mentioned person (names)			
III.	Through undertakings controlled by the abovementioned person (names)			
IV.	Through persons acting in concert with the abovementioned person (names)			
	<b>TOTAL</b>	<b>0</b>	<b>0.000%</b>	

Note: Complete the number of forms as are required for every member of the board giving the appropriate numbering 2.1, 2.2, 2.3 etc (place the second numeral after the number 2 in the above form).

Position	NAME – SURNAME	SIGNATURE	DATE
DIRECTOR	GEORGIOS KOUFARIS		9/2/2020

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		Total number of shares	Percentage to the total number of shares	Trading Code / Trading Account
3.	General Manager Name : KYPRIANOS KYPRIANOU			
I.	Directly	0	0	
II.	Through persons holding shares in their name but for the account of the above mentioned person (names)			
III.	Through undertakings controlled by the abovementioned person (names)			
IV.	Through persons acting in concert with the abovementioned person (names)			
	<b>TOTAL</b>	<b>0</b>	<b>0</b>	

Position

NAME – SURNAME

SIGNATURE

DATE

GENERAL MANAGER

KYPRIANOS KYPRIANOU



8/01/20


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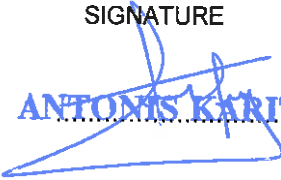
		Total number of shares	Percentage to the total number of shares	Trading Code / Trading Account
4.	Financial Manager Name :			
I.	Directly	0	0	
II.	Through persons holding shares in their name but for the account of the above mentioned person (names)			
III.	Through undertakings controlled by the abovementioned person (names)			
IV.	Through persons acting in concert with the abovementioned person (names)			
	TOTAL	0	0	

Position	NAME – SURNAME	SIGNATURE	DATE
CHAIRMAN	ANTONIS KARITZIS	 ANTONIS KARITZIS	08/01/2020

		Total number of shares	Percentage to the total number of shares	Trading Code / Trading Account
5.	Head of Accounting Department Name :			
I.	Directly	0	0	
II.	Through persons holding shares in their name but for the account of the above mentioned person (names)			
III.	Through undertakings controlled by the abovementioned person (names)			
IV.	Through persons acting in concert with the abovementioned person (names)			
	TOTAL	0	0	

Position	NAME – SURNAME	SIGNATURE	DATE
CHAIRMAN	ANTONIS KARITZIS	 ANTONIS KARITZIS	28/01/2020

		Total number of shares	Percentage to the total number of shares	Trading Code / Trading Account
6.	Secretary Name : <i>KARANTO SECRETARIAL LTD</i>			
I.	Directly	0	0	
II.	Through persons holding shares in their name but for the account of the above mentioned person (names)			
III.	Through undertakings controlled by the abovementioned person (names)			
IV.	Through persons acting in concert with the abovementioned person (names)			
	<b>TOTAL</b>	0	0	

Position	NAME – SURNAME	SIGNATURE	DATE
CHAIRMAN	ANTONIS KARITZIS	 <b>ANTONIS KARITZIS</b>	<u>38/01/2020</u>

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		Total number of shares	Percentage to the total number of shares	Trading Code / Trading Account
7.	Auditors Name :			
I.	Directly	0	0	
II.	Through persons holding shares in their name but for the account of the above mentioned person (names)			
III.	Through undertakings controlled by the abovementioned person (names)			
IV.	Through persons acting in concert with the abovementioned person (names)			
	TOTAL	0	0	

Note: Forms should be completed for any partners and employees which are involved in the auditing of the accounts which hold shares of the company either directly or indirectly, giving the appropriate numbering 7.1, 7.2, 7.3 etc (the second numeral should be placed next to the number 7 above). SEE EXPLANATIONS, NUMBER 4

Position	NAME – SURNAME	SIGNATURE	DATE
CHAIRMAN	ANTONIS KARITZIS	 ANTONIS KARITZIS	08/01/2020

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		Total number of shares	Percentage to the total number of shares	Trading Code / Trading Account
8.	Buy Back	0	0	
	TOTAL	0	0	

Position

NAME – SURNAME

SIGNATURE

DATE

CHAIRMAN

ANTONIS KARITZIS


  
ANTONIS KARITZIS

08/01/2020

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		Total number of shares	Percentage to the total number of shares	Trading Code / Trading Account
9.	Employees Provident Funds <i>Names of funds:</i>			
I.	Directly	0	0	
II.	Through persons holding shares in their name but for the account of the above mentioned person (names)			
III.	Through undertakings controlled by the abovementioned person (names)			
IV.	Through persons acting in concert with the abovementioned person (names)			
	<b>TOTAL</b>	<b>0</b>	<b>0</b>	

Note: Complete the number of forms according to the number of the Employees Provident Funds giving the numbering 9.1, 9.2, 9.3 etc (the second numeral should be placed after the number 9 above).

Position	NAME – SURNAME	SIGNATURE	DATE
CHAIRMAN	ANTONIS KARITZIS		08/01/2020

B.	Major Shareholders (over 5%)	Total number of shares	Percentage to the total number of shares	Trading Code / Trading Account
B.1	<i>Name:</i> <i>3L Transcendent Investments Ltd</i>			
I.	Directly	8,242,877	73.291%	
II.	Through persons holding shares in their name but for the account of the above mentioned person (names)			
III.	Through undertakings controlled by the abovementioned person (names)			
IV.	Through persons acting in concert with the abovementioned person (names)			
	<b>TOTAL</b>	<b>8,242,877</b>	<b>73.291%</b>	

Note: Complete the number of forms according to the number of the major shareholders giving the appropriate numbering B.1, B.2, B.3. etc (the number should be placed after the letter B in the form above).

Position	NAME – SURNAME	SIGNATURE	DATE
CHAIRMAN	ANTONIS KARITZIS	 <b>ANTONIS KARITZIS</b>	<u>08/01/2020</u>

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C.	Company Employees	ID Number	Total number of shares	Percentage to the total number of shares	Trading Code / Trading Account
1.	GEORGE INIATIS	998719	5,271	0.047%	
2.	SOTERIS SOTERIOU	964874	1,000	0.009%	
3	MICHALIS ELEFThERIOU	986099	125	0.001%	
TOTAL			6,396	0.057%	

Number of Employees who hold shares

3

Number of Employees who do not hold shares

2

Position

NAME – SURNAME

SIGNATURE

DATE

CHAIRMAN

ANTONIS KARITZIS

ANTONIS KARITZIS

08/01/2020

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APPENDIX A

	TOTAL NUMBER OF ISSUED BUT NOT LISTED SHARE CAPITAL	Total number of shares	Total
	(a) same category	0	0
	(b) other category	0	0
		0	0

Position	NAME – SURNAME	SIGNATURE	DATE
Chairman	ANTONIS KARITZIS	 ANTONIS KARITZIS	08/01/2020
Secretary	KARANTO SECRETARIAL LTD	 KARANTO SECRETARIAL LIMITED ANTONIS KARITZIS Director of the Secretary	08/01/2020

## EXPLANATIONS:

1. Controlled undertaking means every undertaking in which a person or a number of persons acting in concert, has:
  - i. the majority of voting rights of the shareholders or partners or,
  - ii. the right to appoint or remove the majority of the members of the body of administration, management or surveillance and is at the same time a shareholder or partner of the company or,
  - iii. is a shareholder or partner and by himself controls the majority of the voting rights of the shareholders or partners, pursuant to an agreement entered into with other shareholders or partners of the company.

The rights of every other controlled undertaking as above, as well as the rights of every person who acts in its own name but on behalf of the parent undertaking or any other controlled undertaking, are added to the voting rights and the right of appointment or removal of the parent company.

2. Persons acting in concert, means persons which with coordinated actions or pursuant to agreement, collaborate with each other and includes the following categories of persons by rebuttable presumption:
  - i. the spouse and blood relatives up to first degree of kindred of the persons which are referred to in section (3) of Article 137 (3).
  - ii. companies in which any of the persons referred to in section (3) possess either on its own, or jointly with the other persons that are referred to in section (3), at least twenty percent (20%) of the voting rights,
  - iii. provident funds of an undertaking controlled by any of the persons that are referred to in section (3),
  - iv. partners of any of the persons that are referred to in section (3).

3. Blood relatives up to first degree of kindred include the following persons: Parents, spouse, children.

The relationship of the persons acting in concert with each member of the Board of Directors shall be written in parenthesis eg spouse, children, parents.

4. The term "Auditors" referred to in paragraph «a» of Article 137(3) of the Law of the Stock Exchange includes all of the partners of the audit firm and all its employees which are involved in the audit of the company's accounts. As is stated on the form, forms should be completed for every partner and every employee who is involved in the auditing of the company's accounts who directly or indirectly holds shares of the company. The term «indirectly» includes capital held by persons holding shares in their name but on behalf of a partner or an employee involved in the audit of the accounts of the company, capital held by undertakings controlled by a partner or an employee involved in the auditing of the accounts of the company and capital held by persons acting in concert with a partner or an employee involved in the auditing of the accounts of the company (based on the definitions of paragraphs 1 and 2 above). For partners or employees who are involved in the audit of the company's accounts who do not hold shares of the company, a written statement regarding this should be made as follows:

«The (other) partners and (other) employees involved in the audit of the accounts of .....  
(company name) do not hold shares of the company :

(a) Directly or,

(b) through persons who hold shares in their name but on behalf of any partner or any employee involved in the audit of the company's accounts or,

(c) through undertakings controlled by a partner or an employee involved in the audit of the company's accounts or,

(d) through persons acting in concert with a partner or an employee involved in the audit of the company's accounts, according to the interpretation which is given in Article 137 (4) of the Cyprus Stock Exchange Law»

Note: The words "other" are not included in the event that all the partners and all the employees involved in the audit of the company's accounts do not possess shares of the company directly or indirectly (as is explained above).

5. The phrase "companies in which any of the persons referred to in section (3) of Article 137 (3) of the Cyprus Stock Exchange Law" which is included in subparagraph (ii) of the interpretation of persons acting in concert (paragraph 2 above), means a company in which any of the persons which are referred to in section (a) the Article 137 (3) of the Cyprus Stock Exchange Law, holds directly over 20% of the shares with voting rights.
6. The participation of a trust in a company is attributable to the final beneficiaries (beneficial owners) by rebuttable presumption.
7. Where a participation in the listed company under consideration should be stated more than once, this should be stated only once and a relevant reference for the matter should be given in a separate page of clarifications.

For example if the Chairman of the Board and the Secretary of the listed company under consideration hold 25% and 27% of the voting rights of company A respectively, the participation of company A in the listed company should be charged to either only the President or only the Secretary, making a relevant reference to this fact.

8. Where a member of the administrative, managerial or supervisory bodies of the listed company is simultaneously a major shareholder (over 5%), the inclusion of his participation in category B "Major Shareholders" is not required.
9. Regarding subparagraph (ii) of the interpretation of persons acting in concert (see paragraph 2 above), it is clarified that for the expression "jointly", the participation of the person making the declaration in a company is not required for that person to be considered to fall within the provisions of this subparagraph.

For example if the person making the declaration does not hold shares directly in a company, say company A, but his spouse holds over 20% of the voting rights, this company is considered to fall within the provisions of the above subparagraph, that is, it is considered to be a person acting in concert with the person making the declaration.

10. Where the space given in the forms is not sufficient the remaining items should appear on the back of each form, giving a relevant reference.
11. **Total of listed share capital**

The total listed share capital of each company listed on the CSE as at the last working day of every quarter (end of March, June, September, December).

12. **Buy Back:**

The total number of shares which were acquired by the company itself, including shares which the company owned previously and which are kept in a portfolio and the shares which were acquired by a person acting in his name but on behalf of the company. Companies Law, 135(I)/2000.

13. **Company Employees**

The total number of shares that the personnel owns to the listed share capital of the company shall be submitted to the Council. The Council shall examine each case separately and will decide as to whether this percentage should be considered as free float to the public.

Specifically where there is a large number of employees the employees of the company with the largest stake in its share capital shall be stated, as well as the total number of shares held by the remaining employees. The total number of employees of the company should also be stated.

14. **Trading Code / Trading Account**

Refers to all the trading codes/references and Trading Accounts linked to the persons which are referred to in Sections A and B of the comprehensive free – float form. If there is no trading code/reference, the identification number or the registration number of the company should be stated.

15. **Companies financing investment schemes**

Where the abovementioned companies possess a percentage greater than or equal to 5% of the listed share capital of a listed company, an analytical statement of the shareholders, the number of shares they hold, as well as their percentage to the total share capital of the company should be stated in part B.

16. **Comprehensive details concerning the free – float of the share capital of the company:**

- In part A the Market in which the shares of the company are traded should be stated.
- In part B the following details should be given:
  - (i) The number of legal and natural persons of the company. In this number, the information given in Parts B4 and B5 shall not be taken into account, in order to avoid double counting.
  - (ii) In part B the following should be stated:
    - a. The number of the Members of the Board who hold shares.
    - b. The number of persons who hold shares in their name but on behalf of all of the Members of the Board.
    - c. The number of persons who hold shares through undertakings controlled by the Members of the Board.
    - d. The number of persons who act in concert with the Members of the Board.
  - (iii) In part B5 the number of major shareholders possessing over 5% of the share capital should be stated. Note that if the major shareholder is a Member of the Board or a company that has been included in part B4, then it should not be included for second time.