Notification of the transaction indicated in Article 19 para. 1 of the MAR

1	Details of the person discharging managerial responsibilities/person closely associated			
a)	Name	COMSA S.A.U.		
2	Reason for the notification	son for the notification		
a)	Position/status	PERSON CLOSELY ASSOCIATED WITH JULIO ALVAREZ LÓPEZ, MIQUEL LLEVAT VALLESPINOSA AND JORGE MIARNAU MONTSERRAT, MEMBERS OF THE SUPERVISORY BOARD OF THE ISSUER		
b)	Initial notification/amendment	INITIAL NOTIFICATION		
3	Details of the issuer, emission allowance market participant, auction platform, auctioneer or auction monitor			
a)	Name	TRAKCJA S.A.		
b)	LEI	25940010JQX01TS70C40		
4	Details of the transaction(s): section to be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and (iv) each place where transactions have been conducted			
a)	Description of the financial instrument, type of instrument Identification code	DEMATERIALIZED G SERIES CONVERTIBLE BONDS ISIN: PL0123400023		
b)	Nature of the transaction	SALE		
c)	Price and volume	Price	Volume	
		PLN 1.70	4,514,405	
d)	Aggregated information — Aggregated volume — Price	4,514,405 PLN 1.70		
e)	Date of the transaction	29/09/2022		
0	Place of the transaction	OUTSIDE A TRADING VENUE		
	On	behalf of COMSA S.A.U.		
	Paulina	Galewska – Attorney-in-fact		