

**Notification on the transaction indicated in  
Article 19.1 of MAR**

<b>1 Details of the person discharging managerial responsibilities/person closely associated</b>		
a) Name	COMSA S.A.U.	
<b>2 Reason for the notification</b>		
a) Position/status	PERSON CLOSELY ASSOCIATED WITH JULIO ÁLVAREZ LÓPEZ, MIQUEL LLEVAT VALLESPINOSA AND JORGE MIARNAU MONTSERRAT, MEMBERS OF THE SUPERVISORY BOARD OF THE ISSUER	
b) Initial notification/amendment	INITIAL NOTIFICATION	
<b>3 Details of the issuer, emission allowance market participant, auction platform, auctioneer or auction monitor</b>		
a) Name	TRAKCJA S.A.	
b) LEI	259400IOJQXO1TS70C40	
<b>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</b>		
a) Description of the financial instrument, type of instrument Identification code	DEMATERIALIZED G SERIES CONVERTIBLE BONDS ISIN: PLO123400023	
b) Nature of the transaction	SALE	
c) Price and volume	<b>Price</b>	<b>Volume</b>
	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	
f) Place of the transaction	OUTSIDE A TRADING VENUE	
On behalf of COMSA S.A.U.		
 <hr/> Paulina Galewska – Attorney-in-fact		