

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

<b>1</b>	<b>Details of the person discharging managerial responsibilities/person closely associated</b>		
a)	Name	COMSA S.A.U.	
<b>2</b>	<b>Reason for the notification</b>		
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	
<b>3</b>	<b>Details of the issuer, emission allowance market participant, auction platform, auctioneer or auction monitor</b>		
a)	Name	Trakcja S.A.	
b)	LEI	25940010JQX01TS70C40	
<b>4</b>	<b>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 BEARER SHARES ISIN: PLTRKPL00014	
b)	Nature of the transaction	RELEASE OF EXISTING REGISTERED AND FINANCIAL PLEDGES OVER SHARES	
c)	Price and volume	<b>Price</b>	<b>Volume</b>
		<b>PLN 1.69</b> In case of exercising the rights under the pledge, the value of the acquired shares shall be determined at the quotation rate at the end of the acquisition day. If the shares were not quoted on that day, the value shall be determined at the price of the last day of their quotation.	<b>28,399,145</b>
d)	Aggregated information — Aggregated volume — Price	<b>28,399,145</b> <b>PLN 1.69</b>	
e)	Date of the transaction	30/09/2022	
0	Place of the transaction	OUTSIDE A TRADING VENUE	
On behalf of COMSA, S.A.U.			
			
Paulina Galewska – Attorney-in-fact			