

Barcelona, 10 October 2022

From:
COMSA, S.A.U.
Calle Virat 47
08014 Barcelona (Spain)

1) Komisja Nadzoru Finansowego
ul. Piękna 20
00-549 Warszawa

2) Trakcja S.A.
Aleje Jerozolimskie 100, II p.
00-807 Warszawa (Poland)

NOTIFICATION ON CHANGE IN SHAREHOLDING

In performance of obligations specified in Article 69 Section 1 item 2 and Article 69b Section 1 item 2 of the Act on Public Offering, the Conditions Governing the Introduction of Financial Instruments to Organized Trading, and Public Companies (Journal of Laws of 2021, item 1983, as amended) ("**Act on Public Offering**"), I hereby notify that as a result of the sale of:

- i. 4,514,405 series G bonds convertible into 4,514,405 series D shares (the "**Bonds**") issued by Trakcja S.A. with its registered office in Warsaw (the "**Company**"); and
- ii. 28,399,145 ordinary bearer shares in the Company (the "**Shares**"),

the stake of all shares and all votes in the Company held by COMSA S.A.U. with its registered office in Barcelona ("**COMSA**") decreased to 0%.

1) The date and type of the event that leads to a change in the shareholding to which the notification relates:

On 19 November 2021, COMSA as seller and Agencja Rozwoju Przemysłu S.A. with its registered office in Warsaw ("**ARP**") as buyer, entered into conditional agreement for the sale of all the Bonds, which was also a preliminary agreement for the sale of all the Shares in response to the tender offer for all the remaining shares in the Company to be announced jointly by ARP and PKP Polskie Linie Kolejowe S.A. with its registered office in Warsaw ("**PKP PLK**") (the "**Agreement**").

In performance of the Agreement:

- i. on 29 September 2022, COMSA sold and transferred to ARP all the Bonds (the "**Sale of Bonds**"); and
- ii. on 28 September 2022, ARP and PKP PLK announced the tender offer for the sale of all the remaining shares in the Company (the "**Tender Offer**"). The Shares were sold as a result of the conclusion on 5 October 2022 and the settlement on 7 October 2022

of the acquisition of the shares in the Company subscribed for in the first phase of the Tender Offer.

2) The number of shares held prior to the change in the shareholding and the proportion of the Company's share capital represented by those shares, as well as the number of votes attached to those shares and the proportion of the voting rights held:

Before the change, COMSA held the following number of shares:

Number of shares held in the Company	Percentage share in the share capital of the Company	Number of votes held	Percentage share in the total number of votes
28,399,145	8.44%	28,399,145	8.44%

Before the change, COMSA held the following number of bonds convertible into shares:

Number of bonds	Number of shares that may be created as a result of bond conversion
4,514,405 series G	4,514,405 Series D

3) The current number of shares held and the proportion of the Company's share capital represented by those shares, as well as the number of votes attached to those shares and the proportion of the voting rights held:

After the change, COMSA holds the following number of shares:

Number of Shares held in the Company	Percentage share in the share capital of the Company	Number of votes held	Percentage share in the total number of votes
0	0%	0	0%

After the change, COMSA holds the following number of votes convertible into shares:

Number of bonds	Number of shares that may be created as a result of bond conversion
0	0

4) Subsidiaries of the shareholder that makes the notification, which hold the Company's shares:

COMSA does not have any subsidiaries holding shares of the Company.

5) The persons referred to in Article 87.1 (3) (c):

With respect to votes from shares in the Company COMSA is not a party to voting rights transfer agreement.

- 6) **The number of votes from shares, calculated pursuant to Article 69b.2, to whose acquisition they are entitled or obliged as a holder of financial instruments referred to in Article 69b.1 (1), as well as financial instruments referred to in Article 69b.1 (2) which are not exercised solely by cash settlement, the type and the name of those financial instruments, the date of their expiration, and about the date or time limit within which the acquisition of shares will or may occur:**

COMSA does not hold indicated financial instruments.

- 7) **The number of votes from shares, calculated pursuant to Article 69b.3, to which the financial instruments referred to in art. 69b.1 (2) refer directly or indirectly, the type and the name of these financial instruments, and about the date of their expiration:**

COMSA does not hold indicated financial instruments.

- 8) **The total number of votes as indicated pursuant to subparagraph (3), (6), and (7) and its percentage share in the general number of votes.**

COMSA does not hold any shares and votes in the Company.

Signature

Jorge Miarnau Montserrat

(representative, natural person of COMSA CORPORACION DE INFRAESTRUCTURAS, S.L.,

legal representative of COMSA, S.A.U.)