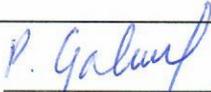


**Notification on the transaction indicated in
Article 19.1 of MAR**

1 Details of the person discharging managerial responsibilities/person closely associated		
a) Name	COMSA, S.A.U.	
2 Reason for the notification		
a) Position/status	PERSON CLOSELY ASSOCIATED WITH FERNANDO PEREA SAMARRA, 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	259400IOJQXO1TS70C40	
4.1 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 BEARER SHARES ISIN: PLTRKPL00014	
b) Nature of the transaction	ESTABLISHMENT OF REGISTERED AND FINANCIAL PLEDGES OVER SHARES	
c) Price and volume	Price	Volume
	PLN 2.13	16,156,193
	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.	
d) Aggregated information		
— Aggregated volume	16,156,193	
— Price	PLN 2.13	
e) Date of the transaction	31.12.2020	

f)	Place of the transaction	OUTSIDE A TRADING VENUE	
4.2 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	REGISTERED SHARES	
b)	Nature of the transaction	ESTABLISHMENT OF REGISTERED AND FINANCIAL PLEDGES OVER SHARES	
c)	Price and volume	Price	Volume
		PLN 2.13	12,242,952
		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.	
d)	Aggregated information — Aggregated volume — Price	12,242,952 PLN 2.13	
e)	Date of the transaction	31.12.2020	
f)	Place of the transaction	OUTSIDE A TRADING VENUE	
On behalf of COMSA, S.A.U.			
 Paulina Galewska – Proxy			