

Report No. 45/2021

The Supreme Administrative Court dismisses the final appeal lodged by the Director of the National Revenue Administration against the judgement of the Provincial Administrative Court in Gliwice of 20 October 2020

With reference to current reports No. 35/2019 of 23 December 2019, No. 11/2020 of 11 March 2020, No. 13/2020 of 19 March 2020, No. 33/2020 of 25 May 2020, No. 43/2020 of 23 June 2020, No. 84/2020 of 19 November 2020 and No. 4/2021 of 4 January 2021, the Management Board of Stalexport Autostrady S.A. ("**Issuer**") hereby informs that on 27 July 2021 it was notified by its subsidiary, i.e. Stalexport Autostrada Małopolska S.A. ("**SAM**") about the Supreme Administrative Court dismissal of the final appeal of the Director of the National Revenue Administration ("**NRA**"). The ruling of the Supreme Administrative Court is final and not subject to appeal.

The final appeal of the Director of the NRA concerned the judgement of the Provincial Administrative Court in Gliwice of 20 October 2020 on SAM's complaint of 23 June 2020 against the decision of the Director of the NRA of 15 May 2020, refusing to initiate proceedings concerning the issuance of an individual interpretation of corporate income tax.

Legal basis:

Article 17 sec. 1 of Regulation of the European Parliament and of the EU Council No. 596/2014 of 16 April 2014 on market abuse (market abuse regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC.