

Report no. 67/2020

Request of Stalexport Autostrada Małopolska S.A. for identification and return of overpayment of corporate income tax for 2019.

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. 48/2020 of 29 June 2020 and no. 62/2020 of 2 September 2020, the Management Board of Stalexport Autostrady S.A. ("**Issuer**") hereby informs that on 30 September 2020 the Issuer's subsidiary - Stalexport Autostrada Małopolska S.A. ("**SAM**") filed a request with the Head of the First Silesian Tax Office in Sosnowiec for:

1) identification by the Head of the First Silesian Tax Office in Sosnowiec of the overpayment of corporate income tax for 2019 in the amount of PLN 16,872,076.00 (say: sixteen million eight hundred seventy three thousand seventy six zlotys) arising from failure to classify the costs of payment to the National Road Fund [KFD] in the amount of PLN 88,800,397.56 (say: eighty eight million eight hundred thousand three hundred ninety seven zlotys and 56/100) as tax deductible expenses, whereas they should be classified as such, the main reason being that they were incurred in order to generate revenues and were not subject to exclusions listed in Article 16 (1) of the Corporate Income Tax Act of 15 February 1992;

2) return of the identified overpayment to the bank account of SAM pursuant to Article 76 § 1 in connection with Article 77b § 1 of the Tax Ordinance Act.

Legal basis:

Article 17(1) of Regulation (EU) No 596/2014 of the European Parliament and of the Council 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.