

**DEBICA**

**POLISH FINANCIAL SUPERVISION AUTHORITY**  
Current Report No. 37/2018

**Date:** December 21, 2018

**Abbreviated name of issuer:**  
DEBICA

**Subject:**  
Answer to the questions asked by the Shareholder pursuant to Article 428 § 6 of the Commercial Companies Code.

**Legal grounds:**  
Art. 56, par. 1, subpar. 2 of the Offering Act – Current and Periodic Information

**Report content:**  
Management Board of Dębica Tire Company S.A. (hereinafter referred to as the "Company") in connection with the request of the proxy of the investment fund ALTUS Market Neutral High Dividend Closed Investment Fund with its registered office in Warsaw (hereinafter referred to as the "Shareholder") for information on the Company pursuant to Art. 428.6 of the Polish Companies Act, provides the answer given by the Company to the questions of the Shareholder concerning the volume of sales of tyres by the Company to entities belonging and not belonging to the Goodyear Tire & Rubber Company capital group.

Response of the Company:  
The Management Board kindly informs that information on detailed sales volumes in individual quarters constitutes a trade secret of the Company and their public disclosure, in the opinion of the Management Board, could adversely affect the market and competitive position of the Company. Therefore, in accordance with instruction 428 § 2 of the CCC, the Management Board cannot provide information on detailed sales volumes in the third quarters of 2017 and 2018.

Regardless of the above decision, the Management Board reminds that all information necessary for the assessment of the financial and business situation of the Company is included in periodical reports published by the Company. In particular, the interim reports for the third quarter of 2017 and 2018 include the profit and loss account item "net revenues from the sale of products, goods and materials", specifying how much of these revenues come from related parties.

In addition, further information on sales to Goodyear group companies (including year-on-year comparisons) is included in paragraph 3 of the "Other information" section. (after the Additional Information) of the interim report of the Company for the 3rd quarter of 2018. This section contains, among other things, detailed information on the amount of revenues, profit on sales and margin, with a division in relation to related and unrelated entities, as well as the presentation of changes in these items year-on-year. Moreover, in the annual report, the Company also provides information on the annual sales volume of all tyres (without distribution to customers) - see section 1.4 of the Management Board's Report on the activities of T.C. Dębica S.A. for 2017.

In the opinion of the Management Board, this publicly available information transparently and transparently illustrates the structure of revenues to the extent necessary for investors to assess the Company's standing.

Detailed legal basis: § 19 para. 1 point 10 of the Regulation of the Minister of Finance of March 29, 2018 on current and periodic information provided by issuers of securities and conditions for recognizing as equivalent information required by the laws of a third country.