

BRODOGRADILIŠTE SPECIJALNIH OBJEKATA d.o.o.

Bobovica 10A, HR-10430 Bobovica (Samobor)
OIB: 15413473504

BEDESCHI S.p.A.

Via Praimbole 38
35010 Limena (PD), Italija
n/r g. Rino Bedeschi / Legal department

Samobor, ____ June 2026.

SUBJECT: Response to the letter dated June 17, 2026 – request for hand-over of materials and work in progress

Dear Sir/Madam,

We acknowledge receipt of your letter dated June 17, 2026, requesting the immediate hand-over of materials and work in progress (work in progress) which you claim to be the property of Bedeschi S.p.A. We hereby inform you that we cannot accept your request due to the reasons outlined below.

All materials delivered under project C07961 have entered the production process and, through processing, have become work in progress (parts in progress). These items were created through processing, where the value of labor manifold exceeds the value of the incorporated material. Consequently, these items constitute the property of the company BRODOGRADILIŠTE SPECIJALNIH OBJEKATA d.o.o. Therefore, there are no materials in their original form suitable for hand-over, nor is there any legal basis for the hand-over of the work in progress.

Pre-bankruptcy proceedings have been initiated against BRODOGRADILIŠTE SPECIJALNIH OBJEKATA d.o.o. and are being conducted before the Commercial Court in Zagreb under case number St-2590/2025. Consequently, the company cannot freely dispose of assets that form part of the pre-bankruptcy estate, and particularly not by handing over the disputed assets outside the framework and rules of the pre-bankruptcy proceedings.

It follows from the accompanying letter and the claim registration form submitted by Bedeschi S.p.A. that the company has registered a claim in the pre-bankruptcy proceedings representing the monetary equivalent of the value of the disputed steel. Your registered claim (item number 5 in the table of registered claims) has been disputed in the pre-bankruptcy proceedings. By item V of the ruling of the Commercial Court in Zagreb,

case number St-2590/2025 dated March 27, 2026, you were instructed on the method of pursuing the disputed claim.

Article 68 of the Bankruptcy Act prescribes a ban on initiating new litigation proceedings in relation to claims affected by pre-bankruptcy proceedings.

Given that you have duly registered your claim against Brodogradilište specijalnih objekata d.o.o., that the claim has been disputed, and that the court has instructed you on how to pursue it, there is currently no legal basis for BSO d.o.o. to hand over the work in progress, which in fact represents the monetary equivalent of the registered claim. As previously pointed out, there is no basis for this under the original contract or the Civil Obligations Act either

Notwithstanding the foregoing, in good faith and without prejudice to our rights, and without admitting any fact or claim, we express our readiness to jointly proceed, with the engagement of an independent expert (court expert), to determine the amount of damage that our company has suffered due to the circumstances related to the termination of the contract.

We emphasize that this proposal refers exclusively to determining the amount of damage and does not affect the issue of the justification of the contract termination, nor the contractually agreed method of resolving disputes between the parties.

This letter does not constitute an admission of any obligation, claim, or right of the other party, nor a waiver of any right of our company. We expressly reserve all rights, including the right to compensation for damages, the right of retention, and the right to set off all mutual claims.

Sincerely,

BRODOGRADILIŠTE SPECIJALNIH OBJEKATA d.o.o.

Tomislav Debeljak, director

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