

Current Report No.: 25/2023

Release date: 15 March 2023

Subject: Acquisition of the Company's shares under the share buyback programme.

Legal basis: Other regulations

Text of the report:

The Management Board of ACTION S.A. (hereinafter also: the Issuer, the Company) announces that as part of the execution of the programme of acquisition of own shares under the authorisation granted in Resolutions Nos. 3 and 5 of the Extraordinary General Meeting of ACTION S.A. of 26 October 2022 and in accordance with the detailed conditions for the share buy-back published in Current Report No. 52/2022 of 28 October 2022, the Issuer made the following acquisitions of the Company's shares (ISIN code: PLACTIN00018) in the period from 9 March 2023 to 15 March 2023 during trading sessions on the main market of the Warsaw Stock Exchange:

- on 9 March 2023, 5,820 own shares with a total value of PLN 104,154.34, at an average unit share price of PLN 17.90. These shares constitute 0.0290% of the Issuer's share capital and give the right to 5,820 votes at the Company's General Meeting, which constitutes 0.0290% of the total number of votes.
- on 19 March 2023, 6,132 own shares with a total value of PLN 109,722.80, at an average unit share price of PLN 17.89. These shares constitute 0.0306% of the Issuer's share capital and give the right to 6,132 votes at the Company's General Meeting, which constitutes 0.0306% of the total number of votes.
- on 13 March 2023, 6,181 own shares with a total value of PLN 106,195.10, at an average unit share price of PLN 17.18. These shares constitute 0.0308% of the Issuer's share capital and give the right to 6,181 votes at the Company's General Meeting, which constitutes 0.0308% of the total number of votes.
- on 14 March 2023, 6,632 own shares with a total value of PLN 115,492.84, at an average unit share price of PLN 17.41. These shares constitute 0.0331% of the Issuer's share capital and give the right to 6,632 votes at the Company's General Meeting, which constitutes 0.0331% of the total number of votes.
- on 15 March 2023, 6,724 own shares with a total value of PLN 115,725.62, at an average unit share price of PLN 17.21. These shares constitute 0.0336% of the Issuer's share capital and give the right to 6,724 votes at the Company's General Meeting, which constitutes 0.0336% of the total number of votes

As a result of all the aforementioned transactions and the previously acquired shares, the Issuer holds a total of 1,094,209 own shares, representing 5.4609% of the Issuer's share capital, giving it the right to 1,094,209 votes at the Company's General Meeting, representing 5.4609% of the total number of votes.

The above acquisition transactions of own shares were carried out through IPOPEMA Securities S.A, Warsaw.

Attached hereto, the Issuer provides details of the acquisition transactions of own shares concluded between 9 March 2023 – 15 March 2023.

Legal basis: Art. 2(2) and (3) of Commission Delegated Regulation (EU) 2016/1052 of 8 March 2016 supplementing Regulation (EU) No 596/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the conditions applicable to buy-back programmes and stabilisation measures in conjunction with Article 5(3) of Regulation (EU) No 596/2014 of the European Parliament and of the Council on market abuse (MAR).