

**Current Report No.:** 104/2025

**Release date:** 23/12/2025

**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") with reference to current report No. 51/2024 of June 19, 2024,) announces that as part of the execution of the programme of acquisition of own shares under the authorisation granted in Resolutions No. 14 and 15 of the Ordinary General Meeting of ACTION S.A. of June 19, 2024 (taking into account the changes based on the Resolutions no. 3 and 4 Extraordinary General Meeting of ACTION S.A. of January 9, 2025), as well as in accordance with the detailed conditions for acquiring own shares published in the current report No. 52/2024 of June 19, 2024, in current report no. 7/2025 of January 09, 2025, and current report No. 60/2025 of June 17, 2025, the Issuer made the following acquisitions of the Company's shares (ISIN code: PLACTIN00018) in the period from December 18, 2025 to December 23, 2025 during trading sessions on the main market of the Warsaw Stock Exchange:

- On December 18, 2025, 1,440 own shares with a total value of PLN 43,245.00, at an average unit price of PLN 30.03. These shares represent 0.0102% of the Issuer's share capital and entitle the holder to 1,440 votes at the Company's General Meeting, which represents 0.0102% of the total number of votes.
- On December 19, 2025, 1,335 own shares with a total value of PLN 40,617.95, at an average unit price of PLN 30.43. These shares represent 0.0095% of the Issuer's share capital and entitle the holder to 1,335 votes at the Company's General Meeting, which represents 0.0095% of the total number of votes.
- On December 22, 2025, 1,332 own shares with a total value of PLN 40,319.60, at an average unit price of PLN 30.27. These shares represent 0.0094% of the Issuer's share capital and entitle the holder to 1,332 votes at the Company's General Meeting, which represents 0.0094% of the total number of votes.
- On December 23, 2025, 1,349 own shares with a total value of PLN 40,727.10, at an average unit price of PLN 30.19. These shares represent 0.0096% of the Issuer's share capital and entitle the holder to 1,349 votes at the Company's General Meeting, which represents 0.0096% of the total number of votes.

As a result of all the above transactions and the shares previously acquired under the authorizations expressed in Resolutions No. 14 and 15 of the Annual General Meeting of ACTION S.A. of 19 June 2024, taking into account their amendments made on the basis of Resolutions 3 and 4 of the Extraordinary General Meeting of ACTION S.A. of 09 January 2025, Resolutions No. 16 and 17 of the Annual General Meeting of ACTION S.A. of 17 June 2025, the Issuer holds a total of 202,087 own shares, constituting 1.4332% of the Issuer's share capital, entitling to 202,087 votes at the General Meeting of the Company, which constitutes 1.4332% of the total number of votes.

Attached hereto, the Issuer provides details of the acquisition transactions of own shares concluded between on 18 December 2025 – 23 December 2025.

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).