

Current Report No.: 106/2025

Release date: 31/12/2025

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 24, 2025 to December 30, 2025 during trading sessions on the main market of the Warsaw Stock Exchange:

- on December 29, 2025, 1,383 treasury shares with a total value of PLN 41,850.50, for an average unit price of PLN 30.26. These shares constitute 0.0098% of the Issuer's share capital and entitle to 1,383 votes at the Company's General Meeting, which is 0.0098% of the total number of votes.

As a result of all the above transactions and the previously acquired shares under the authorizations expressed in Resolutions No. 14 and 15 of the Annual General Meeting of ACTION S.A. of June 19, 2024, taking into account the amendments thereto made on the basis of Resolutions 3 and 4 of the Extraordinary General Meeting of ACTION S.A. dated 09.01.2025, Resolutions No. 16 and 17 of the Annual General Meeting of ACTION S.A. dated 17.06.2025, the Issuer holds a total of 203,470 treasury shares, constituting 1.4430% of the Issuer's share capital, entitling to 203,470 votes at the General Meeting of the Company, which constitutes 1.4430% of the total number of votes.

Attached hereto, the Issuer provides details of the acquisition transactions of own shares concluded between on 24 December 2025 – 30 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).