

**Current Report No.:** 29/2025

**Release date:** 18/03/2025

**Subject:** Notification of exceeding the threshold of 10% of the total number of votes in the Company.

**Legal basis:** Art. 70 point 1 of the Act on Public Offering – acquisition or disposal of a significant block of shares

**Text of the report:**

Based on Article. 69 section 1 point 1) of the Act of July 29, 2005 on public offering and conditions for introducing financial instruments to organized trading and on public companies (Journal of Laws No. 2024, item 620, as amended) Management Board of ACTION S.A. (hereinafter also: "Company", "Issuer") informs that, acting on the basis of the authorization contained in Resolutions No. 14 and No. 15 of the Ordinary General Meeting of ACTION S.A. of June 19, 2024 as amended by Resolutions No. 3 and 4 of the Extraordinary General Meeting of ACTION S.A. of January 9, 2025 on authorizing the Management Board of the Company to acquire the Company's own shares, and Resolution No. 1 of the Company's Management Board of March 7, 2025 on establishing the conditions of the Company's own share purchase program by way of an invitation to submit offers for the sale of the Company's shares, as well as pursuant to Art. 362 § 1 point 8) and art. 362 § 4 of the Commercial Companies Code, on March 17, 2025, the Issuer purchased 1,000,000 own shares constituting 6.0470% of the share capital of the Issuer and entitling to 1,000,000 votes at the General Meeting of the Company, which constitutes 6.0470% of the total number of votes.

This transaction resulted in ACTION S.A. exceeding threshold of 10% of the total number of votes at the General Meeting of ACTION S.A. The transaction of purchasing own shares was carried out through Ipopema Securities S.A. based in Warsaw, in accordance with current report No. 23/2025 of March 7, 2025.

Before concluding the above-mentioned transaction, ACTION S.A. directly held 1,340,689 own shares, constituting 8.1072% of the share capital of the Issuer, entitling to 1,340,689 votes at the General Meeting of the Company, which constitutes 8.1072% of the total number of votes.

After settlement of the transaction, the Issuer holds a total of 2,340,689 own shares, constituting 14.1543% of the share capital of the Issuer, entitling to 2,340,689 votes at the General Meeting of the Company, which constitutes 14.1543% of the total number of votes.

The Issuer informs that there are no entities dependent on ACTION S.A. that would hold the company's shares or financial instruments relating to the shares of ACTION S.A. referred to in Art. 69 section 4 points 7-9 of the Act on Public Offering, and there are no persons referred to in Art. 87 section 1 point 3 letter c of the Act on Public Offering.

The Issuer reminds that shares purchased as part of the buy-back of own shares are subject to the limitation referred to in Art. 364 § 2 of the Commercial Companies Code.