

**Current Report No.:** 39/2025

**Release date:** 17/04/2025

**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 and in current report no. 7/2025 of January 09, 2025, the Issuer made the following acquisitions of the Company's shares (ISIN code: PLACTIN00018) in the period from April 10, 2025 to April 16, 2025 during trading sessions on the main market of the Warsaw Stock Exchange:

- on 10.04.2025, 3,422 own shares with a total value of PLN 67,687.16, for an average unit price of PLN 19.78. These shares constitute 0.0207% of the Issuer's share capital and entitle to 3,422 votes at the General Meeting of the Company, which constitutes 0.0207% of the total number of votes.
- on 11.04.2025, 3,151 own shares with a total value of PLN 62,011.68, for an average unit price of PLN 19.68. These shares constitute 0.0191% of the Issuer's share capital and entitle to 3,151 votes at the General Meeting of the Company, which constitutes 0.0191% of the total number of votes.
- on 14.04.2025, 2,954 own shares with a total value of PLN 58,331.96, for an average unit price of PLN 19.75. These shares constitute 0.0179% of the Issuer's share capital and entitle to 2,954 votes at the General Meeting of the Company, which constitutes 0.0179% of the total number of votes.
- on 15.04.2025, 2,864 own shares with a total value of PLN 57,121.40, for an average unit price of PLN 19.94. These shares constitute 0.0173% of the Issuer's share capital and entitle to 2,864 votes at the General Meeting of the Company, which constitutes 0.0173% of the total number of votes.
- on 16.04.2025, 2,621 own shares with a total value of PLN 52,128.10, for an average unit price of PLN 19.89. These shares constitute 0.0158% of the Issuer's share capital and entitle to 2,621 votes at the General Meeting of the Company, which constitutes 0.0158% of the total number of votes.

As a result of all the above transactions and previously acquired shares under the authorizations expressed in Resolutions No. 14 and 15 of the Ordinary General Meeting of ACTION S.A. of 19.06.2024, taking into account their changes made on the basis of the 3rd and 4th Extraordinary General Meeting of ACTION S.A. As of January 9, 2025, the Issuer holds a total of 2,405,267 own shares, constituting 14.5448% of the Issuer's share capital and entitling to 2,405,267 votes at the General Meeting of the Company, which constitutes 14.5448% of the total number of votes.

The above transactions of purchase of own shares were carried out through Ipopema Securities S.A. based in Warsaw.

Attached hereto, the Issuer provides details of the acquisition transactions of own shares concluded between on 10 April 2025 – 16 April 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).