

**Current Report No.:** 3/2025

**Release date:** 08/01/2025

**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, 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, the Issuer made the following acquisitions of the Company's shares (ISIN code: PRACTIN00018) in the period from January 02, 2025 to January 08, 2025 during trading sessions on the main market of the Warsaw Stock Exchange:

- on 02 January 2025, 3,119 own shares with a total value of PLN 63,315.80, for an average unit price of PLN 20.30. These shares constitute 0.0189% of the Issuer's share capital and entitle to 3,119 votes at the General Meeting of the Company, which constitutes 0.0189% of the total number of votes.
- on 03 January 2025, 3,219 own shares with a total value of PLN 67,053.25, for an average unit price of PLN 20.83. These shares constitute 0.0195% of the Issuer's share capital and entitle to 3,219 votes at the General Meeting of the Company, which constitutes 0.0195% of the total number of votes.
- on 07 January 2025, 3,244 own shares with a total value of PLN 67,949.60, for an average unit price of PLN 20.95. These shares constitute 0.0196% of the Issuer's share capital and entitle to 3,244 votes at the General Meeting of the Company, which constitutes 0.0196% of the total number of votes.
- on 08 January 2025, 3,510 own shares with a total value of PLN 74,136.50, for an average unit price of PLN 21.12. These shares constitute 0.0212% of the Issuer's share capital and entitle to 3,510 votes at the General Meeting of the Company, which constitutes 0.0212% of the total number of votes.

As a result of all the aforementioned transactions and the previously acquired shares under the authorizations expressed in Resolutions No. 14 and 15 of the Ordinary General Meeting of ACTION S.A. on June 19, 2024, the Issuer holds a total of 1,247,391 own shares, constituting 7.5430% of the Issuer's share capital, entitling to 1,247,391 votes at the General Meeting of the Company, constituting 7.5430% 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 02 January 2025 – 08 January 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).