

Current Report No.: 46/2025

Release date: 21/05/2025

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 May 15, 2025 to May 21, 2025 during trading sessions on the main market of the Warsaw Stock Exchange:

- on 15.05.2025, 3,231 own shares with a total value of PLN 66,924.05, for an average unit price of PLN 20.71. These shares constitute 0.0195% of the Issuer's share capital and entitle to 3,231 votes at the General Meeting of the Company, which constitutes 0.0195% of the total number of votes.
- on 16.05.2025, 3,128 own shares with a total value of PLN 64,593.20, for an average unit price of PLN 20.65. These shares constitute 0.0189% of the Issuer's share capital and entitle to 3,128 votes at the General Meeting of the Company, which constitutes 0.0189% of the total number of votes.
- on 19.05.2025, 3,129 own shares with a total value of PLN 64,457.40, for an average unit price of PLN 20.60. These shares constitute 0.0189% of the Issuer's share capital and entitle to 3,129 votes at the General Meeting of the Company, which constitutes 0.0189% of the total number of votes.
- on 20.05.2025, 3,139 own shares with a total value of PLN 64,588.95, for an average unit price of PLN 20.58. These shares constitute 0.0190% of the Issuer's share capital and entitle to 3,139 votes at the General Meeting of the Company, which constitutes 0.0190% of the total number of votes.
- on 21.05.2025, 3,118 own shares with a total value of PLN 64,950.20, for an average unit price of PLN 20.83. These shares constitute 0.0189% of the Issuer's share capital and entitle to 3,118 votes at the General Meeting of the Company, which constitutes 0.0189% 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 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. of 09.01.2025, the Issuer holds a total of 2,461,543 own shares, constituting 14.8851% of the Issuer's share capital and entitling to 2,461,543 votes at the General Meeting of the Company, which constitutes 14.8851% 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 15 May 2025 – 21 May 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).