

**Current Report No.:** 51/2025

**Release date:** 04/06/2025

**Subject:** Notification of exceeding the threshold of 15% 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. 184, item 1539, 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 15 of the Ordinary General Meeting of ACTION S.A. of 19 June 2024 (taking into account their amendments made on the basis of Resolutions No. 3 and 4 of the Extraordinary General Meeting of ACTION S.A. of 09 January 2025), as well as in accordance with the detailed terms and conditions of the purchase of own shares published in Current Report No. 52/2024 of 19 June 2024 and in Current Report No. 7/2025 of 09 January 2025, as well as under Art. 362 § 1 item 8) of the Commercial Companies Code, as a result of transactions concluded between 29/05/2025 and 04/06/2025, ACTION S.A. exceeded the threshold of 15% of the total number of votes at the General Meeting of ACTION S.A. The transactions to acquire own shares were carried out through Ipopema Securities S.A. with its registered office in Warsaw, in accordance with current report no. 50/2025 of 04 June 2025.

Before the above transaction, ACTION S.A. directly held 2,473,259 own shares, entitling to 2,473,259 votes at the General Meeting, which constituted 14.9559% of the share capital and 14.9559% of the total number of votes at the General Meeting.

After settlement of the transaction, the Issuer holds a total of 2,483,024 own shares, constituting 15.0150% of the share capital of the Issuer, entitling to 2,483,024 votes at the General Meeting of the Company, which constitutes 15.0150% 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.