

**Current Report No.:** 77/2025

**Release date:** 28/08/2025

**Subject:** Notification of a reduction in the shareholding below the threshold of 5% 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:**

Pursuant to Article 69 section 1 item 2) of the Act of July 29, 2005, on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organized Trading, and Public Companies (consolidated text: Journal of Laws of 2025, item 592), the Management Board of ACTION S.A. (hereinafter also referred to as the "Company", "Issuer") hereby announces that the Issuer's shareholding in ACTION S.A. with its registered office in Zamienie has decreased below the 5% threshold in the total number of votes as a result of the registration of a reduction in the Company's share capital.

Pursuant to Current Report No. 75/2024 of the Issuer, on August 26, 2025, the District Court for the Capital City of Warsaw in Warsaw, 14th Commercial Division of the National Court Register, registered amendments to the Company's Articles of Association, reducing the Company's share capital by PLN 243,700, i.e., from PLN 1,653,700. to PLN 1,410,000 and a change in the number of shares issued by the Company from the previous 16,537,000 shares to 14,100,000. The above amendments to the Issuer's Articles of Association result from the cancellation of 2,437,000 treasury shares in the Company.

Prior to the aforementioned amendments, the Issuer held 2,555,259 treasury shares, representing 15.4518% of the Company's share capital and entitling it to 2,555,259 votes at the General Meeting, which constituted 15.4518% of the total number of votes. After settling the redemption and taking into account the share purchase transaction on 27 August 2025 as part of the Issuer's share buyback program based on the authorization contained in Resolutions No. 14 and 15 of the Annual General Meeting of ACTION S.A. dated 19.06.2024 (taking into account the amendments made on the basis of Resolutions No. 3 and 4 of the Extraordinary General Meeting of ACTION S.A. dated 09.01.2025 and Resolutions No. 16 and 17 of the Annual General Meeting of ACTION S.A. dated 17.06.2025), as well as in accordance with the detailed terms and conditions of acquisition of own shares published in current report No. 52/2024 dated 19.06.2024 and in current report No. 7/2025 dated 09.01.2025 and current report No. 60/2025 dated 17.06.2025, the Issuer holds 119,497 own shares, entitling to 119,497 votes at the General Meeting, which constitutes 0.8475% of the share capital and 0.8475% of the total number of votes at the General Meeting.

The Issuer hereby informs that there are no subsidiaries of ACTION S.A. that hold shares in the Company, and there are no financial instruments concerning ACTION S.A. shares referred to in Article 69, Section 4, Items 7-8 of the Act on Public Offering, nor are there any persons referred to in Article 87, Section 1, Item 3, Letter c of the Act on Public Offering.

The Issuer reminds that shares acquired through the share buyback are subject to the restriction referred to in Article 364 § 2 of the Commercial Companies Code.