

**Current Report No.:** 79/2025

**Release date:** 29/08/2025

**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:**

The Management Board of ACTION S.A. (hereinafter also referred to as the "*Company*", "*Issuer*") hereby announces that it has today received a notification pursuant to Article 69, Section 2, Item 1, Letter a) and Section 1, Item 1) of the Act of 29 July 2005 on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organized Trading, and Public Companies (Journal of Laws, No. 184, item 1539, as amended) – hereinafter referred to as the "*Act*"), of exceeding the 15% threshold of the total number of votes in the Company and of a change in the previously held shareholding by STARLIGHT FUNDACJA RODZINNA (hereinafter referred to as the "*Shareholder*") by more than 2% of the total number of votes.

According to the above notification, as a result of the registration of changes involving a reduction in the Company's share capital by PLN 243,700 and, consequently, the redemption of 2,437,000 treasury shares of ACTION S.A. (representing the same number of votes at the General Meeting), of which the Issuer informed the market in Current Report No. 75/2024 dated August 27, 2025, the Shareholder's share in the Issuer's total votes changed.

The Shareholder indicated in its notification that:

- the registration of the redemption of the Issuer's treasury shares resulted in the Shareholder exceeding the 15% threshold of the total number of votes at the General Meeting of ACTION S.A. and a change in the previously held share by more than 2% of the total number of votes,
- prior to the aforementioned changes, it directly held 2,479,448 shares, entitling it to 2,479,448 votes at the General Meeting, which constituted 14.99% of the share capital and 14.99% of the total number of votes at the General Meeting of ACTION S.A.
- after the settlement of the aforementioned changes, directly holds 2,479,448 shares in the Issuer, entitling to 2,479,448 votes at the General Meeting, representing 17.58% of the share capital and 17.58% of the total number of votes at the General Meeting of ACTION S.A.

At the same time, the notification indicates that:

- there are no subsidiaries of the Shareholder holding shares in the Company,
- there are no financial instruments referred to in Article 69, Section 4, Items 7-8 of the Act;
- there are no persons referred to in Article 87, Section 1, Item 3, Item c of the Act.