Current Report No.: 10/2026

Relase date: 23/02/2026

Subject: Invitation to submit offers for the sale of Company shares under the programme for the acquisition of own shares.

Legal basis: Other regulations

Text of the report:

The Management Board of ACTION S.A. (hereinafter also referred to as the "*Issuer*", the "*Company*"), with reference to current reports No. 6/2026 and 8/2026 dated 15 January 2026, hereby announces that on 23 February 2026 the Company's Management Board decided to supplement the share buyback program implemented under the authorization contained in Resolutions No. 3 and 4 of the Extraordinary General Meeting of ACTION S.A. dated 15 January 2026 (regarding the authorization of the Company's Management Board to acquire the Company's own shares and the creation of a reserve capital to finance the acquisition of treasury shares), by way of an invitation for shareholders to submit offers to sell the Company's shares (hereinafter: the "Invitation").

The Invitation is addressed to all shareholders of the Company who are entitled to submit offers to sell the Company's shares.

As a result of the Invitation and the acceptance of sale offers, the Company intends to acquire not more than 1,000,000 treasury shares.

The proposed purchase price per share is PLN 35.00.
In the Invitation, the Issuer set the following dates:
a) commencement of accepting offers to sell shares from the Company's shareholders – 24 February 2026,
b) completion of accepting offers to sell shares from the Company's shareholders – 26 February 2026,
c) expected publication of information on the number of shares to be acquired – 27 February 2026,
d) expected date of transfer of ownership of shares (settlement date) – 3 March 2026.

During the period of accepting offers to sell shares under the Invitation, the Issuer will not carry out transactions involving the acquisition of treasury shares on the regulated market operated by the Warsaw Stock Exchange S.A. The entity acting as an intermediary in the execution and settlement of share acquisition transactions for the purposes of this Invitation will be Ipopema Securities S.A., with its registered office in Warsaw.

The detailed terms and conditions of acquiring shares by way of the Invitation are set out in the "Invitation to submit offers to sell shares" together with the template of the "Offer to sell shares of Action S.A.", which constitute an appendix to this current report.

Legal basis: Article 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 (MAR).