

INVITATION TO SUBMIT OFFERS FOR THE SALE OF SHARES OF

Action S.A. with registered office in Zamienie, 05-500 Piaseczno
at ul. Dawidowska 10,

entered in the Register of Entrepreneurs kept by the District Court for the Capital City of Warsaw in Warsaw, 14th Commercial Division of the National Court Register, under KRS number 0000214038

(**"Company"**)

This invitation to submit offers to sell the Company's shares (the "Invitation") does not constitute a tender offer for the subscription for the sale or exchange of shares referred to in Article 72a et seq. of the Act of 29 July 2005 on public offering and the conditions for introducing financial instruments to an organized trading system and on public companies. This Invitation does not constitute an offer within the meaning of Article 66 of the Act of 23 April 1964 – the Civil Code.

This Invitation shall only be executed within the territory of the Republic of Poland. The Invitation shall not be construed as an offer for the sale or the solicitation of an offer for the purchase or sale of any financial instruments, nor shall it constitute an advertisement or promotion of any financial instrument or of the Company.

The Invitation does not constitute a recommendation or investment advice, or any other recommendation, legal or tax advice, nor is it an indication that any investment or strategy is appropriate for the individual circumstances of any person or entity that intends to respond to this Invitation. In any matters relating to this Invitation, Shareholders (as defined below) to whom this Invitation is addressed should seek advice from investment, legal or tax advisors. Shareholders (as defined below) responding to this Invitation shall bear all legal, financial and tax consequences of their investment decisions. Neither the Company nor the Intermediary shall be liable for the effects and consequences of decisions made on the basis of the Invitation or any information contained therein. Liability for decisions made on the basis of the Invitation shall be borne solely by the persons or entities using it, in particular those making the decision to submit a sale offer.

The Shareholders interested in the sale of the shares referred to in this Invitation should make their own detailed study of the contents of the Invitation and the publicly available information concerning the Company and carefully analyse and evaluate such information, and their decision to sell the shares of the Company should be based on such analysis as they themselves consider appropriate.

This Invitation does not need to be approved or communicated to the Polish Financial Supervision Authority (KNF) or any other public authority.

This Invitation was published on 23 February 2026. The text of this Invitation is also available on the website of the brokerage house IPOPEMA Securities S.A. (www.ipopemasecurities.pl).

Any additional information concerning the procedure of accepting the Sale Offers (as defined below) submitted in response to this Invitation may be obtained in person at the registered office of the brokerage house IPOPEMA Securities S.A. at ul: ul. Próżna 9, 00-107 Warsaw or by telephone at +48 (22) 236 92 95 or +48 (22) 236 92 98 - on days and during working hours of IPOPEMA and at the following email address: skup@ipopema.pl.

1. SUBJECT-MATTER OF THE INVITATION – ACQUIRED SHARES

The subject-matter of this Invitation is no more than 1,000,000 (in words: one million) dematerialised ordinary bearer shares, with a nominal value of PLN 0.10 (ten grosz) each, issued by the Company, registered by the Krajowy Depozyt Papierów Wartościowych S.A. (the Central Securities Depository of Poland) ("**KDPW**") under ISIN code: PLACTIN00018, which represent no more than 6.05% of the share capital of the Company and entitle to exercise no more than 7.1% of the total number of votes at the general meeting of the Company ("**Acquired Shares**" or "**Shares**", and each of them an "**Acquired Share**" or "**Share**").

One Acquired Share entitles the holder to one vote at a general meeting of the Company. The Acquired Shares are traded on the main market operated by the Warsaw Stock Exchange.

This Invitation has been published in connection with Resolution No. 3 of the Extraordinary General Meeting of Shareholders of the Company dated 15 January 2026 regarding the authorization of the Company's Management Board to acquire the Company's own shares, as well as Resolution No. 1 of the Company's Management Board dated 23 February 2026 on determining the terms of the Company's share buyback program by way of an invitation to submit offers to sell the Company's shares (the "**Resolutions**").

2. THE ENTITY INVITING TO SUBMIT OFFERS FOR THE SALE AND THE ENTITY ACQUIRING THE SHARES

The entity inviting Shareholders (as defined below) to submit offers for the sale of Shares (the "**Sale Offers**") and, at the same time, the entity acquiring Shares in response to this Invitation is the Company.

The Management Board of the Company adopted a resolution of 23 February 2026 on the determination of detailed terms and conditions for the procedure of buying back the Company's Shares (the "**Management Board Resolution**").

The buyback terms and condition set out in this Invitation reflect the buyback terms and condition set out by the Company in the Resolutions and the above Management Board Resolution.

3. ACQUISITION PRICE AND REMUNERATION

The proposed acquisition price for each Acquired Share will be PLN 35.00 (in words: thirty five zlotys, zero grosz) per Acquired Share (the "**Acquisition Price**").

The maximum total amount allocated by the Company for the purposes of this Invitation is PLN 35,000,000 (in words: thirty five million zlotys) (the "**Total Acquisition Amount**").

4. ACQUISITION OF SHARES FROM SHAREHOLDERS AND RULES OF REDUCTION

As a result of this Invitation and the acceptance of the Sale Offers by the Company, the Company will acquire up to 1,000,000 (in words: one million) Shares. No fractions of the Acquired Shares will be acquired under the Invitation.

In the event that the total number of Shares covered by all Sale Offers validly submitted by Shareholders during the period of acceptance of Sale Offers is greater than the maximum number of Acquired Shares, the Company will reduce the number of Shares covered by Sale Offers proportionally to the total number of Shares rounded down. In the event that fractions of Shares remain after the application of the proportional reduction, the Shares that have not been allocated will be allocated one Share at a time, starting with the largest Sale Offers to the smallest, until they are completely exhausted.

5. THE INTERMEDIARY ENTITY IN THE EXECUTION AND SETTLEMENT OF THE ACQUISITION TRANSACTION

The intermediary entity in the execution and settlement of the acquisition transaction for the purposes of this Invitation is:

IPOPEMA Securities S.A.
ul. Próźna 9, 00-107 Warsaw

Tel.: +48 (22) 236 92 95;
+48 (22) 236 92 98
E-mail: skup@ipopema.pl
www.ipopemasecurities.pl

(“IPOPEMA”).

6. INVITATION SCHEDULE

Date of publication of the Invitation:
23 February 2026

Commencement date for accepting Sale Offers:
24 February 2026

Deadline for accepting Sale Offers:
26 February 2026, 5:00 p.m. Warsaw time

Expected date of publication of information on the number of Shares to be acquired:
27 February 2026

Expected date of transfer of ownership of the Acquired Shares (acquisition and transfer of ownership of the Acquired Shares to the Company – settlement date):
3 March 2026

The Company reserves the right to change the dates relating to the Invitation (detailed information is provided in point 12 below).

7. PERSONS OR ENTITIES ENTITLED TO SELL SHARES IN RESPONSE TO THE INVITATION

All shareholders, i.e. entities or persons who - at the time of acceptance of their Sale Offers - have the Company's Shares registered in their securities accounts or in whose name the Shares are registered in omnibus accounts kept for them ("**Shareholders**"), are entitled to submit Sale Offers in response to this Invitation, taking into account the restrictions applicable to entities accepting Sales Offers resulting from generally applicable legal provisions.

Attention is drawn to possible restrictions on the disposal of the Company's shares or the submission of Sale Offers that may apply in the individual situation of a given Shareholder as a result of sanctions that are or may be imposed in the future under applicable laws. Each Shareholder should independently assess whether they are subject to such sanctions that prevent them from submitting a Sale Offer or selling shares in response to the Invitation, and in case of doubt, seek legal advice.

The Company's shares offered in response to this Invitation must be free from any encumbrances (including, but not limited to, any ordinary, fiscal, registered or financial pledge, seizure in enforcement proceedings, option, pre-emption right or other right of priority) as well as any other rights, encumbrances or restrictions in favor of third parties of a proprietary or contractual nature.

8. PROCEDURE OF SUBMITTING OFFERS FOR THE SALE OF SHARES

Shareholders are advised, prior to the submission of the Sale Offers, to familiarise themselves with the procedures and regulations of the entities keeping the securities accounts in which the Acquired Shares are recorded to the extent necessary for the submission of all necessary instructions in order to respond to the Invitation, including, *inter alia*, the deadlines applied by the entity concerned, as well as the fees charged by such entities for performing the above actions.

Sale Offers may be submitted:

1. directly at the entities keeping securities accounts for Shareholders, provided that the relevant entity allows its customers to submit the Sale Offer in this manner in response to the Invitation, or
2. at IPOPEMA.

in each case, subject to receipt of a correctly filled and complete Sale Offer by the entities accepting the Sale Offers and IPOPEMA by 17:00, Warsaw time, on the last day of acceptance of the Sale Offers, as indicated in section 6 above.

Each investment firm (brokerage office and house) determines its own hours and method of accepting sales offers from investors for whom it maintains accounts on which shares are held or for whom it has

signed an agreement for the provision of brokerage services referred to in art. 69 sec. 2 item 1 of the Act on Trading (including, in particular, the possibility of submitting a subscription by correspondence and by telephone or e-mail).

I. SUBMISSION OF AN OFFER FOR THE SALE OF SHARES THROUGH AN ENTITY THAT KEEPS A SECURITIES ACCOUNT OR AN OMNIBUS ACCOUNT FOR A SHAREHOLDER

The Sale Offer for the Shares recorded in a securities account or omnibus account shall be accepted at the entity keeping the aforementioned securities account or omnibus account, provided that such entity provides a brokerage service consisting in accepting and transferring orders to purchase or sell financial instruments referred to in Article 69(2)(1) of the Act of 29 July 2005 on Trading in Financial Instruments (“**Act on Trading**”) and on condition that the entity concerned allows its customers to submit the Sale Offers in this manner in response to the Invitation and the Shareholder submitting the Shares Sale Offer under the Invitation has concluded a contract with such entity for the provision of such services.

If the entity which keeps the securities account or the omnibus account in which the Shares are recorded does not provide brokerage services referred to in Article 69(2)(1) of the Act on Trading, the Shares Sale Offer should be submitted to another entity with which the Shareholder has signed an agreement to provide the service referred to above or at the IPOPEMA registered office.

Where a Shareholder submitting a Shares Sale Offer holds Shares registered in securities accounts or omnibus accounts kept by different entities, Sale Offers should be submitted to each of these entities and should relate to the Shares covered by the Sale Offer registered in securities accounts or omnibus accounts kept by the relevant entity.

When submitting a Sale Offer, the Shareholder is required to submit:

- (i) two forms of Sale Offer - one for the Shareholder and the account holder each, and
- (ii) an irrevocable instruction to block the Shares included in the Sale Offer, expiring on the settlement date of the acquisition of the Shares by the Company.

The Sale Offer may be submitted only by the owner of the Shares, their statutory representative or duly authorised proxy. The power of attorney should be made in writing and certified by the entity accepting the Sale Offer or in the form of a notarial deed or with a notarised signature. Another form of authentication of the signature of the Shareholder or the person acting on their behalf is also permissible, in accordance with the regulations in force in the given entity accepting Sale Offers in response to the Invitation, provided that Sale Offers may be accepted in such a way that they are accepted by the entity accepting Sale Offers by the last day of accepting Share Sale Offers specified in the Invitation.

Upon acceptance of the Shares Sale Offers, the entity which keeps the Shareholder's securities account shall block the Acquired Shares for settlement and confirm to IPOPEMA the submission of the Sale Offer on the terms and conditions set out in the detailed procedure for the execution of the sale of the Acquired Shares.

The information referred to above shall be provided to IPOPEMA by the entity accepting the Sale Offer immediately after the acceptance of the Sale Offer, but no later than by 13:00 on the day following the day on which the entity keeping the account accepted the Sale Offer.

Shareholders intending to submit Shares Sale Offers should contact the entities where they intend to submit such Sale Offers in order to confirm the place, times and manner of submission of the Sale Offers, including the possibility of submitting the Shares Sale Offers on the basis of a telephone instruction, an instruction submitted via the Internet or bearing a secure electronic signature verified with a valid qualified certificate or otherwise, in accordance with the internal regulations of such entities, subject to the deadlines set out in section 6 above.

The entity keeping an account for a Shareholder may charge fees or commissions for the performance of activities in connection with the handling of the Sale Offer, in accordance with the internal regulations and tables of fees and commissions applicable to the entity.

Neither the Company nor IPOPEMA shall be liable to the Shareholders for any damage caused by the failure of the entity keeping the Shareholder's securities account to notify IPOPEMA that the Sale Offer has been submitted.

II. SHAREHOLDERS INTENDING TO SUBMIT A SALE OFFER, IF THE ENTITY WHICH KEEPS THE SECURITIES ACCOUNT OR THE OMNIBUS ACCOUNT IN WHICH THE SHARES ARE RECORDED DOES NOT PROVIDE BROKERAGE SERVICES REFERRED TO IN ARTICLE 69(2)(1) OF THE ACT ON TRADING THE SHARES SALE OFFER SHOULD DO THE FOLLOWING:

- (i) submit to the entity which keeps the securities account or the omnibus account in which the Acquired Shares are deposited an irrevocable instruction to issue a settlement instruction to the KDPW system for the transfer of the rights attached to the Shares to the Company under the terms and conditions specified in the Sale Offer. The settlement instruction will form the basis for the transfer of ownership of the Acquired Shares to the Company,
- (ii) obtain a share certificate issued in respect of the Acquired Shares which Shareholders intend to sell to the Company in response to the Invitation,
- (iii) submit to the entity with which the Shareholder has signed an agreement for the provision of brokerage services referred to in Art. 69 section 2 point 1 of the Act on Trading or to IPOPEMA a completed Sale Offer form, attached as Appendix 1 to this Invitation, in duplicate, one for the Shareholder submitting the Sale Offer and for IPOPEMA each. The Sale Offer form should be accompanied by the original share certificate issued by the entity keeping the Shareholder's securities account or omnibus account confirming the blocking of the Shares until the date of settlement for the acquisition of the Shares indicated in section 6 above.

In the event that the number of the Company's Shares indicated in the Sale Offer does not correspond to the number of Shares indicated on the accompanying share certificate, in particular is higher than the number of blocked Shares, such Sale Offer shall be deemed invalid.

In addition, a Shareholder submitting a Sale Offer should provide:

- (i) identity card or passport (natural persons);
- (ii) extract from the register relevant to the Shareholder (Shareholders who are not natural persons);
- (iii) an extract from the register relevant to the Shareholder's registered office or other official document containing basic data about the Shareholder, from which the Shareholder's legal status, method of representation and the names of persons authorised to represent it (non-residents who are not natural persons) can be inferred.

In addition, when submitting a Sales Offer to IPOPEMA a Shareholder who is not a customer of IPOPEMA will be required to enter into a contract with IPOPEMA for the acceptance and transmission of orders to purchase or sell financial instruments referred to in Article 74b(1)(1) of the Act on Trading ("**OAT Contract**").

Shareholders submitting Sale Offers by post or using electronic mail should take into account that the dispatch of documents relating to the Sale Offer submitted even before the end of the period for acceptance of Sale Offers may result in delivery of such documents to IPOPEMA after the end of the period for acceptance of Sale Offers, which will result in no effective submission of such Sale Offer. Neither the Company nor IPOPEMA accepts any liability whatsoever for the consequences of failure to deliver the correspondence relating to the Sale Offer by the date indicated in this Invitation.

In case of using the correspondence form in IPOPEMA, the Shareholder shall be obliged to:

- (i) submit to the entity that keeps the securities account or omnibus account in which the Acquired Shares are deposited an instruction to issue instructions with respect to the sale of the Acquired Shares to the Company,
- (ii) obtain a share certificate issued in respect of the Acquired Shares which the Shareholder intends to sell to the Company in response to the Invitation,
- (iii) send to IPOPEMA by registered mail with acknowledgement of receipt or by courier service, or by e-mail, the documents listed below:

- the original share certificate referred to in item (ii) above, confirming the blocking of the Shares until the date of settlement for the acquisition of the Shares indicated in section 6 above;
- a completed and signed form of the Sale Offer, according to the template attached as Appendix 1 to this Invitation (in two copies - one for the Shareholder and one for IPOPEMA each). The signature of a Shareholder submitting a Sale Offer must be certified by an employee of the entity issuing the share certificate in the form of a signature on the Sale Offer form or notarisation, or, in the case of Sale Offers submitted by e-mail, a qualified electronic signature;
- two copies of the OAT Contract (applicable to Shareholders who are not customers of IPOPEMA). The Shareholder's signature on the OAT Contract must be notarised.

The documents indicated above shall be delivered to IPOPEMA no later than on the last day of acceptance of the Sale Offers indicated in section 6 above, by 17:00. Warsaw time.

If the Sale Offer is submitted by e-mail, Shareholders intending to submit the Sale Offer are required to sign their documents with a qualified electronic signature (compliant with the Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC (eIDAS Regulation)), and the above requirements shall apply accordingly, provided that the entity accepting the Sales Offer accepts this form of signature.

The above documents should be sent to the following e-mail address: skup@ipopema.pl.

The Form of Sale Offer, attached as Appendix 1 to this Invitation, and the template of OAT Contract, together with the relevant regulations, will be available at the registered office of IPOPEMA.

Shareholders may submit any number of Sale Offers.

One share certificate may only be used to confirm one Sale Offer.

It is acknowledged that the Share Offer is irrevocable, may not contain any reservations or conditions and is binding on the Shareholder until the settlement date for the acquisition of the Shares. Any consequences, including invalidity of the Sale Offer, resulting from an incorrect or incomplete completion of the Sale Offer or the share certificate shall be borne by the Shareholder.

Only valid and complete Sale Offers submitted in accordance with the terms and conditions set out in the Invitation will be accepted. Sale Offers received before the date of commencement of acceptance of the Sale Offers, after the date of conclusion of acceptance of the Sale Offers as well as Sale Offers completed illegibly, , submitted on the wrong form or submitted without attaching the required documents will not be accepted.

The transfer of the Acquired Shares between the Shareholders who submit valid Sale Offers and the Company will be made outside organised trading and will be settled through the KDPW depository and settlement system. The entity acting as an intermediary in the settlement shall be IPOPEMA.

9. ACTING THROUGH A PROXY

Shareholders entitled to sell Shares under the Invitation may act through a duly authorised proxy when submitting the Sale Offer. The instrument of proxy should be drawn up in the form of a notarial deed or with a notarised signature, or should be certified by the entity that issued the share certificate, in accordance with the entity's internal regulations. Another form of authentication of the signature of the Shareholder or a person acting on their behalf is also permissible, in accordance with the regulations in force at the given entity accepting Sale Offers in response to the Invitation.

Unless the provisions of law or international agreements to which the Republic of Poland is a party provide otherwise, a power of attorney granted abroad should be certified by a notary and bear an apostille or authenticated by a Polish diplomatic mission or consular office and translated into Polish by a sworn translator in Poland.

One person acting as proxy may represent any number of Shareholders.

An extract from the relevant register or other official document containing basic data on the proxy and Shareholder from which their legal status, the manner of representation, as well as the names of the persons entitled to represent it can be inferred and the instrument of proxy (or copies thereof) shall be retained by IPOPEMA.

10. PAYMENT OF THE ACQUISITION PRICE

The Acquisition Price for the Acquired Shares to be acquired by the Company will be paid by the Company in accordance with the terms and conditions of this Invitation.

Payment of the Acquisition Price for the Acquired Shares acquired by the Company as a result of the acceptance of the Sale Offers submitted in response to this Invitation will be made through the settlement system of the KDPW, on the basis of paid settlement instructions issued by IPOPEMA on behalf of the Company and the entities accepting subscriptions/keeping the Shareholders' securities accounts. The amount being the product of: (a) the number of Acquired Shares disposed of by the Shareholder concerned and (b) the Acquisition Price shall be transferred to the cash or bank account of the Shareholder concerned linked to the securities account in which the Acquired Shares of that Shareholder were recorded and from which the transfer of those Acquired Shares to the Company took place; provided, however, that the amount finally transferred to the Shareholder's disposal may be reduced by the commission payable (if such commission is charged by the brokerage entity issuing the settlement instruction), as well as fees for other activities performed by such entities in connection with the execution of the Sale Offer, in accordance with the schedule of fees of such entity.

For the purposes of settling the Share Sale Offer, the Company has established security in an amount not lower than the Total Purchase Amount in the form of a blockade of funds in the Company's investment account maintained by IPOPEMA.

11. TAXATION

The sale of Shares to the Company may result in tax consequences for Shareholders. For these reasons, all Shareholders should take advice from their tax advisers before making an investment decision.

12. CANCELLATION OR SUSPENSION OF THE INVITATION, CHANGES TO THE INVITATION SCHEDULE

The Company reserves the right to cancel this Invitation or to withdraw from its execution, in particular to withdraw from the acquisition of the Company's shares offered for sale in response to this Invitation, or to suspend its execution at any time, but no later than the first working day preceding the date of conclusion of acceptance of the Sale Offers. The Company reserves the right to change the dates relating to the Invitation.

Cancellation of the Invitation or change of the deadlines for the Invitation do not require the Shareholder to change the content of the Sale Offers or other documents required in accordance with the Invitation, which were submitted before the information about the event was made public. Changing the deadlines for the Invitation does not result in the invalidity of the Sale Offers submitted by the Shareholders before the information about the change was made public.

In the event of cancellation or suspension of the Invitation or changing the dates relating to the Invitation, appropriate information will be made public in the manner in which this Invitation was made public, as well as published on the IPOPEMA website at (www.ipopemasecurities.pl).

In the event of cancellation, withdrawal from its execution or suspension of the Invitation or changing the dates relating to the Invitation, neither the Company nor IPOPEMA shall be liable to reimburse the Shareholders, their proxies or legal representatives for any costs incurred in connection with the submission of the Sale Offer or other actions necessary for the submission of the Sale Offer, or to pay any compensation.

13. INFORMATION ON THE PROCESSING OF PERSONAL DATA BY IPOPEMA

Pursuant to Articles 13(1) and (2) and 14(1) and (2) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("GDPR"), we inform you about the manner and purpose of processing personal data (the "Data"), as well as about your rights related to data protection.

A. Who is responsible for the processing of the Data and who can be contacted?

The controller of the Data is IPOPEMA Securities S.A., ul. Próżna 9, 00-107 Warsaw. IPOPEMA has appointed a Data Protection Officer who can be contacted in writing at: IPOPEMA Securities S.A., ul. Próżna 9, 00-107 Warsaw, with the note "Data Protection Officer", or by email at: iodo.dm@ipopema.pl.

B. Why and on what legal basis do we process your Data?

We process Data in accordance with the provisions of the GDPR. The processing of Data takes place:

- in connection with the performance of obligations imposed by law (Article 6(1)(c) GDPR), including those related to obligations under the Act of 29 July 2005 on trading in financial instruments (consolidated text: Journal of Laws of 2024, item 722, as amended) and regulations referred to therein, and the Act of 1 March 2018 on counteracting money laundering and terrorist financing (consolidated text: Journal of Laws of 2025, item 644);
- on the basis of the legitimate interests pursued by IPOPEMA (Article 6(1)(f) GDPR), for example where IPOPEMA processes data of persons acting on behalf of clients, where IPOPEMA acts to prevent crime, ensure IT security, or for the purposes of establishing, pursuing or defending claims.

Providing Data is a condition for the execution of the Sale Offer, results from compliance with the above legal obligations, or is necessary to achieve the purposes resulting from the legitimate interests of IPOPEMA. If you do not provide the required data, IPOPEMA will not be able to provide services related to the Sale Offer.

C. To whom may we disclose the Data?

Data may be disclosed to other recipients for the purpose of fulfilling IPOPEMA's legal obligations or to pursue its legitimate interests. In particular, Data recipients may include:

- a) the Company and its authorized employees;
- b) public authorities, such as the Polish Financial Supervision Authority;
- c) entities involved in processes necessary to execute the Sale Offer;
- d) entities authorized to receive information covered by professional secrecy or indicated in other legal provisions;
- e) entities processing data on behalf of IPOPEMA, provided that such entities process data under an agreement with IPOPEMA and solely in accordance with IPOPEMA's instructions.

D. How long will your Data be processed (retained)?

Your Data will be processed for the period necessary to achieve the purposes indicated in section B above, i.e.:

- with regard to compliance with legal obligations incumbent on IPOPEMA in connection with its business activities – until such obligations have been fulfilled;
- until the legitimate interests pursued by IPOPEMA forming the basis for such processing have been fulfilled, or until you object to such processing, unless there are overriding legitimate grounds for further processing.

E. Rights of the Shareholder whose Data is processed:

- the right to access personal data, including the right to obtain a copy of such data in accordance with Article 15 GDPR;
- the right to request rectification (correction) of personal data where the data is inaccurate or incomplete, in accordance with Article 16 GDPR;
- the right to request erasure of personal data in accordance with Article 17 GDPR;
- the right to request restriction of processing in accordance with Article 18 GDPR;
- the right to data portability in accordance with Article 20 GDPR;
- the right to object in accordance with Article 21 GDPR;
- the right to lodge a complaint with a supervisory authority, which in Poland is the President of the Personal Data Protection Office, if you believe that the processing of your data violates the GDPR.

F. Source of the Data

Where Sale Offers are submitted through an attorney or representative, the source of the data are such persons. Otherwise, we obtain data directly from the Shareholder submitting the Sale Offer.

G. Categories of processed Data

We process your data to the extent specified in the Sale Offer form.

Piotr Bieliński

President of the Management Board
of ACTION S.A.

Sławomir Harazin

Vice – President of the Management Board
of ACTION S.A.

APPENDIX NO. 1 TO THE INVITATION TO SUBMIT OFFERS FOR THE SALE OF SHARES OF ACTION S.A.

OFFER FOR SALE OF SHARES OF ACTION S.A. (TEMPLATE)

This document (the “**Share Sale Offer**”), provided that it is duly completed, constitutes a response to the Invitation to submit offers for the sale of shares of ACTION S.A. (the “**Company**”) relating to ordinary bearer shares and bearing the ISIN code PLACTIN00018 (the “**Shares**”), which was announced by the Company on 23 February 2026 through IPOPEMA Securities S.A. (the “**Invitation**”).

All terms capitalized in this Shares Sale Offer shall have the meaning given to them in the Invitation.

Each Shareholder is entitled to submit more than one Share Sale Offer in respect of different Shares held by the Shareholder.

1. Shareholder details:

Given name and surname/Name:

Address of residence/Registered office:

(street, house and apartment number, postcode, city or town)

Correspondence address *(if different from the above)*:

(street, house and apartment number, postcode, city or town)

Telephone number:

Tax residency status *(mark as appropriate)*: resident non-resident

Identification Number*:.....

** depending on the type of person: Personal Identification Number PESEL, Statistical Identification Number (REGON), passport number, number of the relevant register*

LEI code**:.....

*** applies to legal persons, organizational units without legal personality and natural persons conducting economic activity*

2. Details of proxy/representative of the legal entity *(if applicable)*:

Name and surname:

Number and series of identity document:

Name and surname:

Number and series of identity document:

3. Company Shares offered for sale:

Price per Share: **PLN 35.00 (thirty five zlotys, zero grosz)**

Number of Shares offered for sale:

Number of Shares in words:

Securities account number:

4a. Information concerning the brokerage office/house/custodian bank or the depositary in whose account at the KDPW the Shares are deposited, as per the attached share certificate *(does not apply to Share Sale Offers submitted directly to the entity keeping the Shareholder's securities account)*:

Name of brokerage office/house/ custodian bank/depositary:

KDPW account number where the Shares are deposited:

4b. Instructions of the person submitting the Share Sale Offer *(only applicable to Share Sale Offers submitted directly to the entity keeping the Shareholder's securities account)*:

I hereby give the following instructions to the entity accepting this Shares Sale Offer:

1. an instruction to block the Shares indicated in item 3 above in my securities account for the purpose of settlement of the Share Sale Offer, expiring on the settlement date of the acquisition of the Shares by the Company;
2. an irrevocable instruction to issue a settlement instruction in favour of the Company in respect of the above-designated Shares in accordance with the terms and conditions set out in the Invitation and this Share Sale Offer;
3. an instruction to transmit to IPOPEMA Securities S.A., by the date specified by it, information on the number of Shares blocked in connection with the Share Sale Offer;
4. an instruction to perform any other actions necessary to complete the Share Sale Offer.

4c. Instructions of the person submitting the Share Sale Offer *(only applicable to Share Sale Offers submitted by a Shareholder for whom the entity maintaining the securities account or the collective account in which the Shares are recorded does not provide brokerage services referred to in art. 69 sec. 2 item 1 of the Trading Act)*:

I hereby submit an irrevocable sale instruction to the Company concerning the above-marked Shares, in accordance with the terms specified in the Invitation and this Share Sale Offer.

At the same time, I confirm that I have submitted an instruction to issue a settlement instruction in favor of the Company to the entity maintaining the Shareholder's securities account.

5. Declaration by the person submitting the Share Sale Offer.

I, the undersigned, hereby declare that:

1. I have read the contents of the Invitation and accept the terms and conditions set out therein, in particular the terms and conditions under which the Shares covered by this Share Sale Offer will be sold to the Company and the terms and conditions of any reduction in the offers submitted (including this Share Sale Offer).
2. All Shares covered by this Share Sale Offer have been blocked in the securities account up to and including the date of settlement and clearing of the Share Sale Offer of ACTION S.A., and an instruction has been given to transfer the Shares to the Company's securities account kept by IPOPEMA Securities S.A.
3. This Share Sale Offer shall remain valid until settlement and clearance of the Share Offer submitted on the date specified in the Invitation and may not be revoked or otherwise modified by the Shareholder until such time.
4. The Shares offered for sale have been fully paid and are free from any encumbrances and third party rights.
5. The share certificate issued by the entity keeping the securities account that the Shares have been appropriately blocked is attached to this form (not applicable to Share Sale Offers submitted directly to the entity keeping the Shareholder's securities account).

6. I agree that the entity accepting the Share Sale Offer may transfer my data and information constituting professional secrets and information related to the Share Sale Offer submitted by me to IPOPEMA Securities S.A. (applies to Share Sale Offers submitted directly to the entity keeping the Shareholder's securities account).
7. I have been informed that the controller of my personal data contained in this form is IPOPEMA Securities S.A. with its registered office in Warsaw, ul. Próźna 9, 00-107 Warsaw. Contact details of the Data Protection Officer: iodo.dm@ipopema.pl, mailing address: ul. Próźna 9, 00-107 Warsaw; c/o: Data Protection Officer. The data will be processed for the purpose of carrying out all activities related to the execution of the Share Sale Offer. The basis for the processing of the data shall be (i) to take action at my request in connection with the submission of the Share Sale Offer (Article 6(1)(b) of the GDPR), (ii) to comply with the legal obligations borne by IPOPEMA Securities in connection with its activities as a financial institution (Article 6(1)(c) of the GDPR), in particular arising from: (i) the Act of 1 March 2018 on the counteracting money laundering and terrorist financing, (ii) the Act of 9 October 2015 on the implementation of the Agreement between the Government of the Republic of Poland and the Government of the United States of America to Improve International Tax Compliance and to Implement FATCA legislation and (iii) the Act of 9 March 2017 on the exchange of tax information with other countries (CRS); or (iii) the fulfilment of the legitimate interests of the controller, in particular for the purposes: i) related to monitoring and improving the quality of the IPOPEMA Securities S.A.'s products and services, including monitoring of telephone calls and meetings, examination of your satisfaction with the services provided, ii) related to risk management and internal control of IPOPEMA Securities S.A. on the basis of Article 83b of the Act of 29 July 2005 on trading in financial instruments, iii) where applicable, connected with the conduct of litigation, including the handling of complaints, as well as proceedings before public authorities and other proceedings, iv) of preventing fraud and the use of IPOPEMA Securities S.A.'s activities for criminal purposes, including for the purpose of processing and sharing information on the suspicion or detection of criminal offences (Article 6(1)(f) RODO). My personal data will be stored for the period necessary for the execution of this Share Sale Offer or the performance of the contract for the provision of brokerage services concluded with me, the fulfilment of legal obligations borne by IPOPEMA Securities S.A., or the investigation and defence against claims, including the handling of complaints, for the period resulting from the course of the general limitation periods for claims. The recipient of the data will be the entity keeping of my securities account. Data may also be made available to entities providing consulting, auditing, accounting, IT, archiving and document destruction services to IPOPEMA Securities S.A. I have the right of access to the content of my data and the right to rectification, erasure, restriction of processing, the right to data portability in relation to this data the processing of which is based on my consent or a contract concluded with me and, where applicable, the right to object to the processing. I have the right to lodge a complaint with the President of the Office for Personal Data Protection. The controller shall not transfer your personal data outside the European Economic Area. The provision of my personal data is voluntary, but is necessary for the Share Sale Offer and its execution. My personal data will not be subject to automated processing. Information on the processing of personal data at IPOPEMA Securities S.A. is available at: <https://www.ipopemasecurities.pl>.
8. I have been informed that this Sales Offer is irrevocable.

*Signature of the person submitting the Share
Sale Offer*

*Date of receipt of the form and signature and
stamp of the receiving employee*

*Signature of the employee of the entity issuing the share
certificate*

(not applicable to Share Sale Offers submitted directly to the entity keeping the Shareholder's securities account)
