

Current Report No.: 12/2026

Release date: 04/03/2026

Subject: Notification of exceeding 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(1)(1) 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 (consolidated text: Journal of Laws of 2025, item 592), the Management Board of ACTION S.A. (hereinafter also referred to as the “Company”, the “Issuer”) hereby announces that, acting on the basis of the authorization granted 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), and Resolution No. 2 of the Company’s Management Board dated 15 January 2026 on determining the terms and conditions of the share buyback program by way of an invitation to submit offers to sell the Company’s shares, as well as pursuant to Article 362 §1(8) of the Commercial Companies Code, the Issuer completed, on 27 February 2026, the conclusion of share purchase agreements concerning the acquisition of 1,000,000 treasury shares, representing 7.0922% of the Issuer’s share capital and carrying 1,000,000 voting rights at the Company’s General Meeting, which constitute 7.0922% of the total number of voting rights. The settlement of the transaction took place on 3 March 2026.

This transaction resulted in ACTION S.A. exceeding the threshold of 5% of the total number of voting rights at the General Meeting of ACTION S.A. The acquisition of treasury shares was carried out through IPOPEMA Securities S.A., with its registered office in Warsaw, in accordance with current report No. 11/2026 dated 27 February 2026.

Prior to the conclusion of the above transaction, ACTION S.A. directly held 203,470 treasury shares, representing 1.4430% of the Issuer’s share capital and carrying 203,470 voting rights at the Company’s General Meeting, constituting 1.4430% of the total number of voting rights.

Following the settlement of the transaction, the Issuer holds a total of 1,203,470 treasury shares, representing 8.5352% of the Issuer’s share capital and entitling to 1,203,470 voting rights at the Company’s General Meeting, which constitutes 8.5352% of the total number of voting rights.

The Issuer informs that there are no subsidiaries of ACTION S.A. that hold shares in the Company or financial instruments related to ACTION S.A. shares as referred to in Article 69(4)(7)–(9) of the Public Offering Act, and there are no persons referred to in Article 87(1)(3)(c) of the Public Offering Act.

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