

Remuneration Report of the Supervisory Board of ACTION S.A. for 2025

The Supervisory Board of ACTION S.A., with its registered office in Zamienie, carried out a comprehensive review of the remuneration of individual members of the Management Board and the Supervisory Board in accordance with the Remuneration Policy adopted by the Annual General Meeting of the Company pursuant to Resolution No. 11 of 19 June 2024 (hereinafter: the "Remuneration Policy") and, in accordance with Article 90g of the Act of 29 July 2005 on Public Offering and the Conditions for Introducing Financial Instruments to an Organised Trading System and on Public Companies (hereinafter: the "Public Offering Act"), hereby presents this Remuneration Report for 2025 (hereinafter: the "Report").

I. Introduction

The Supervisory Board prepares the Report for the next reporting period – 2025. Previous remuneration reports of the Supervisory Board of ACTION S.A. covered:

a) jointly the years 2019 and 2020 (in accordance with Article 36(2) of the Act of 16 October 2019 amending the Public Offering Act and certain other acts); b) the year 2021; c) the year 2022; d) the year 2023; e) the year 2024.

The current reporting period continues to fall within the period of implementation by the Company of the arrangement concluded with creditors in the sanation proceedings conducted under the Act of 15 May 2015 – Restructuring Law (hereinafter: the "Restructuring Law") from 1 August 2016 (opening of the proceedings) to 15 December 2020 (completion of the proceedings). The specific nature of the sanation proceedings, and subsequently the period of performing the arrangement and its conditions, significantly influenced the Company's business processes, which remain focused on increasing profitability and reducing operating costs. At the same time, during the reporting period, an increase in the Company's revenues was also observed, as well as their further diversification, aimed both at quantitative revenue growth and diversification of revenue sources.

As a result of these assumptions, the implementation of the Remuneration Policy also took into account the ongoing execution of the arrangement and the Company's development activities across multiple areas, alongside an improvement in the Company's financial parameters, as reported in periodic reports for 2025. It should be emphasised that the Company's restructuring process was successful not only in terms of its formal completion through a legally binding arrangement with creditors, but also in terms of sustainable and positive changes in business models. Despite losses incurred by the Company in the years 2016–2018, the reporting period and the preceding years (since 2019) are characterised by the generation of positive financial results.

No changes to the Remuneration Policy were made during the reporting period.

During the reporting period, on 24 April 2025, the Supervisory Board specified certain criteria of the Remuneration Policy within the scope defined in Article 90d(7) of the Public Offering Act and point 12 of the Remuneration Policy with respect to monetary and non-monetary benefits of the Management Board members for 2025.

The Remuneration Reports for: a) 2019–2020, b) 2021, c) 2022, d) 2023, e) 2024 were each subject to advisory resolutions of the General Meeting of ACTION S.A., in accordance with Article 90g(6) of the Public Offering Act. Pursuant to those resolutions, the General Meeting of ACTION S.A. expressed positive opinions on the Supervisory Board's remuneration reports for the years 2019–2024. These advisory resolutions did not include any objections to the reports, suggestions for changes to the remuneration system, or recommendations for modifications to the Remuneration Policy. The Remuneration Policy adopted in 2024 is based, in its fundamental framework, on the assumptions of the previously binding policy from 2020, further developed primarily in the ESG area. Therefore, the Supervisory Board, in accordance with Article 90g(8) of the Public Offering Act, states that, taking into account the position of the General Meeting as expressed in the aforementioned resolutions, it considers that the elements of the

Company's remuneration model function properly, allowing for continued decision-making and evaluation processes in this area.

During the reporting period, the Company's governing and supervisory bodies were composed as follows:

Management Board:

Piotr Bieliński – President of the Management Board,
Sławomir Harazin – Vice-President of the Management Board.

Supervisory Board:

Iwona Bocianowska – Chairwoman of the Supervisory Board,
Piotr Chajderowski – Vice-Chairman of the Supervisory Board,
Adam Świtalski – Independent Member of the Supervisory Board,
Krzysztof Kaczmarczyk – Independent Member of the Supervisory Board,
Marek Jakubowski – Member of the Supervisory Board (Secretary of the Supervisory Board).

Adam Świtalski, Piotr Chajderowski, and Krzysztof Kaczmarczyk also serve as members of the **Company's Audit Committee**.

II. Total remuneration and remuneration from entities within the same capital group of the members of the Management Board and the Supervisory Board, broken down into components and the mutual proportions between these components

Below is presented information on total remuneration for the reporting period (2025), together with comparative data for the previous year (2024), including additional information on remuneration paid during the reporting period for earlier periods (under the "Extraordinary items" category). The data on total remuneration also include the value of remuneration received from entities belonging to the same capital group, as presented in section VI of the Report.

Total remuneration (in PLN)

Name and surname, position		Fixed remuneration			Variable remuneration		Extraordinary items	Pension costs	Total remuneration	Fixed/variable remuneration ratio
		Base salary	Charges	Additional benefits	Annual	Long-term				
PIOTR BIELIŃSKI, PRESIDENT OF THE MANAGEMENT BOARD	2025	543 494,52	0,00	98 408,78	650 000,00*	0,00	241 000,00**	5 856,00	1 538 759,30	42,10%/57,90%
	2024	500 820,89	0,00	97 819,94	400 000,00***	0,00	250 000,00****	5 387,52	1 254 028,35	48,17%/51,83%
SŁAWOMIR HARAZIN, VICE-PRESIDENT OF THE MANAGEMENT BOARD	2025	440 400,00	0,00	72 901,79	650 000,00*	0,00	241 000,00**	5 504,64	1 409 806,43	36,80%/63,20%
	2024	435 600,00	0,00	80 791,66	400 000,00***	0,00	250 000,00****	5 036,16	1 171 427,82	44,51%/55,49%
BOCIANOWSKA IWONA,	2025	45 600,00	0,00	0,00	0,00	0,00	0,00	4 450,56	50 050,56	100%/0%

CHAIRWOMAN OF THE SUPERVISORY BOARD	2024	45 600,00	0,00	0,00	0,00	0,00	0,00	4 450,56	50 050,56	100%/0%
CHAJDEROWSKI PIOTR, MEMBER OF THE SUPERVISORY BOARD	2025	42 000,00	0,00	0,00	0,00	0,00	0,00	3 043,02	45 043,02	100%/0%
	2024	42 000,00	0,00	0,00	0,00	0,00	0,00	3 343,17	45 343,17	100%/0%
JAKUBOWSKI MAREK, MEMBER OF THE SUPERVISORY BOARD	2025	42 000,00	0,00	0,00	0,00	0,00	0,00	4 099,20	46 099,20	100%/0%
	2024	42 000,00	0,00	0,00	0,00	0,00	0,00	4 099,20	46 099,20	100%/0%
KACZMARCZYK KRZYSZTOF, MEMBER OF THE SUPERVISORY BOARD	2025	42 000,00	0,00	630,00	0,00	0,00	0,00	668,96	43 298,96	100%/0%
	2024	42 000,00	0,00	630,00	0,00	0,00	0,00	639,78	43 269,78	100%/0%
ŚWITALSKI ADAM, MEMBER OF THE SUPERVISORY BOARD	2025	42 000,00	0,00	630,00	0,00	0,00	0,00	4 099,20	46 729,20	100%/0%
	2024	42 000,00	0,00	630,00	0,00	0,00	0,00	4 099,20	46 729,20	100%/0%

* Variable remuneration paid in 2025 for Q1 and Q2 2025 was granted pursuant to Supervisory Board Resolutions No. 1 and 2 of 18 July 2025 (Q1) and No. 1 and 2 of 13 November 2025 (Q2). The amount of the above additional gross remuneration was: Piotr Bieliński – PLN 400 thousand; Sławomir Harazin – PLN 400 thousand (Q1), and Piotr Bieliński – PLN 250 thousand; Sławomir Harazin – PLN 250 thousand (Q2). Remuneration for Q3 2025 was paid in 2026 pursuant to Supervisory Board Resolutions No. 6 and 7 of 10 February 2026, in the amount of PLN 250 thousand for each member of the Management Board. Due to the payment date, it was not included in the remuneration amounts paid in 2025 presented in the above table. Due to the application of both financial and non-financial criteria in determining variable remuneration, as well as adjustments related to the implementation of the arrangement by the Company, the amount of remuneration for Q4 2025 cannot be determined and recognised as due for that period. The remuneration was granted pursuant to Sections 4.1 and 4.2 of the Remuneration Policy and the specification of the “Remuneration Policy” within the meaning of Article 90d(7) of the Public Offering Act and Section 12 of the Remuneration Policy, adopted pursuant to Supervisory Board Resolution No. 2 of 24 April 2025.

** In 2025, additional remuneration for Q4 2024 was paid to the members of the Management Board, granted pursuant to Supervisory Board Resolutions No. 2 and 3 of 21 May 2025. The amount of this additional gross remuneration was: Piotr Bieliński – PLN 241 thousand; Sławomir Harazin – PLN 241 thousand. The remuneration was granted pursuant to Sections 4.1 and 4.2 of the Remuneration Policy and the specification of the “Remuneration Policy” within the meaning of Article 90d(7) of the Public Offering Act and Section 12 of the Remuneration Policy, adopted pursuant to Supervisory Board Resolution No. 3 of 21 March 2024.

*** Variable remuneration paid in 2024 for Q1, Q2 and Q3 2024. Due to the application of financial and non-financial criteria in determining variable remuneration, as well as adjustments related to the implementation of the arrangement by the Company, the amount of remuneration for Q4 2024 cannot be determined and recognised as due for that period. Remuneration for Q1, Q2 and Q3 2024 was granted pursuant to Supervisory Board Resolutions No. 2 and 3 of 17 December 2024. The amount of this additional gross remuneration was: Piotr Bieliński – PLN 400 thousand; Sławomir Harazin – PLN 400 thousand. The remuneration was granted pursuant to Sections 4.1 and 4.2 of the Remuneration Policy and the specification of the “Remuneration Policy” within the meaning of Article 90d(7) of the Public Offering Act and Section 12 of the Remuneration Policy, adopted pursuant to Supervisory Board Resolution No. 3 of 21 March 2024.

**** In 2024, additional remuneration for Q4 2023 was paid to the members of the Management Board, granted pursuant to Supervisory Board Resolutions No. 2 and 3 of 22 May 2024. The amount of this additional gross remuneration was:

Piotr Bieliński – PLN 250 thousand; Sławomir Harazin – PLN 250 thousand. The remuneration was granted pursuant to Sections 4.1 and 4.2 of the Remuneration Policy and the specification of the “Remuneration Policy” within the meaning of Article 90d(7) of the Public Offering Act and Section 12 of the Remuneration Policy, adopted pursuant to Supervisory Board Resolution No. 1 of 17 March 2023.

In addition, the Chairwoman of the Supervisory Board provides services to the Company as part of her business activity. As this remuneration is not related to the performance of duties arising from her appointment to the Supervisory Board, but is due for other services provided under a separate legal relationship, it is not included in the remuneration presented in the above table. Therefore, this remuneration is disclosed separately and amounted to PLN 221,400 gross (including VAT) in 2025. In 2024, this remuneration amounted to PLN 416,232 gross (including VAT).

Due to the fact that the Chairwoman of the Supervisory Board is not an independent member of the Supervisory Board, the Remuneration Policy provides for the payment of the above benefits under Section 5.1.6, stating that: “the Company does not permit additional remuneration for independent members of the Supervisory Board and members of the Audit Committee under service agreements, even if such services do not overlap with or conflict with the duties performed as members of the Supervisory Board.”

III. Explanation of how the total remuneration complies with the Remuneration Policy, including how it contributes to the achievement of the Company’s long-term performance

The total remuneration of the members of the Management Board and the Supervisory Board is consistent with the Remuneration Policy. In accordance with its provisions, the following principles apply: a) members of the Management Board are remunerated on the basis of fixed and variable components (Section 4.1.1 of the Remuneration Policy); b) members of the Supervisory Board are remunerated on the basis of fixed components (Section 5.1.1 of the Remuneration Policy).

Moreover, pursuant to Sections 4.1.3 and 5.1.5 of the Remuneration Policy, members of the Management Board and the Supervisory Board may be granted bonuses and other non-monetary benefits, including those available to other employees of the Company, in particular: the right to use certain Company assets (in particular company cars, communication and IT equipment, credit cards); the right to additional insurance (in particular personal and liability insurance); the right to use additional fringe benefits available to employees and regular collaborators (private medical care, sports packages, allowances); the right to participate in training aimed at improving qualifications; the right to participate, under general conditions, in pension programmes operating within the Company (including employee capital plans – PPK). Members of the Management Board may also receive additional remuneration under service agreements, provided that such services do not overlap with or interfere with their duties as members of the Management Board (Section 4.1.4 of the Remuneration Policy). In the case of the Supervisory Board, this rule does not apply to independent members and members of the Audit Committee (Section 5.1.6 of the Remuneration Policy).

During the reporting period (2025), members of the Management Board and the Supervisory Board received fixed remuneration, including base salary and non-monetary benefits.

In addition, members of the Management Board were granted and paid variable remuneration. Pursuant to Section 4.1.2.2 of the Remuneration Policy, variable remuneration components are paid on a quarterly and annual basis. The amount of variable remuneration depends on financial and non-financial performance indicators, defined based on transparent principles and criteria, ensuring effective implementation of the Remuneration Policy. The Company documents the process of determining remuneration amounts, setting management objectives, and assessing the degree to which those objectives are achieved. The basis for determining the amount of variable remuneration for a given period is the assessment of performance against management objectives, including in particular: financial indicators, such as EBITDA, revenue, profit, various types of margins, acquisition of specific clients or business volumes,

as well as other financial objectives aligned with the Company's current business strategy, long-term interests, and stability (as further specified by the Supervisory Board); non-financial indicators, including the implementation of the sustainability strategy (environmental protection, social considerations), maintaining quality, environmental, consumer safety, information security and supply chain management systems, implementing programmes to reduce resource consumption and waste, promoting ethical and socially responsible behaviour, preventing discrimination (including through whistleblowing mechanisms), ensuring safe and hygienic working conditions, and conducting informational, charitable and community-support initiatives. The assessment period may not exceed the period during which a given individual holds a position covered by the Remuneration Policy (Section 4.1.2.3). Variable remuneration is paid after the end of the relevant period, based on data from the Company's periodic reports, including financial statements (for financial criteria) and non-financial statements, confirmed by the statutory auditor (Sections 4.1.2.6–4.1.2.7).

The above principles of the Remuneration Policy were further specified in the document adopted by the Supervisory Board detailing the policy in accordance with Article 90d(7) of the Public Offering Act and Section 12 of the Remuneration Policy (pursuant to Supervisory Board Resolution No. 2 of 24 April 2025), as presented in Section IV of the Report.

In 2025, remuneration in the form of financial instruments was neither granted nor paid.

The values of remuneration paid during the reporting period were also consistent with the Remuneration Policy. Pursuant to Sections 4.2.1–4.2.3 of the Remuneration Policy, the following proportions apply to the remuneration of members of the Management Board:

- the total annual amount of variable remuneration components paid in addition to base salary may not exceed ten times the total annual amount of base salary due to Management Board members;
- the total annual value of bonuses and other non-monetary benefits paid in addition to base salary may not exceed twice the total annual amount of base salary due to Management Board members;
- the total annual value of remuneration in the form of financial instruments granted in addition to base salary may not exceed ten times the total annual amount of base salary due to Management Board members.

With regard to the Supervisory Board, this matter is regulated by Section 5.2.1 of the Remuneration Policy, which provides that, due to the supervisory and control functions performed by the Supervisory Board, the remuneration of its members consists solely of fixed components, representing 100% of remuneration, and is not dependent on the results achieved in the areas subject to its supervision.

The above types and levels of remuneration were aligned with the Company's economic situation in 2025. Further increases in key financial indicators and the achievement of non-financial targets enabled the granting of additional remuneration to members of the Management Board. At the same time, the Management Board remained mindful of the need to fulfil obligations arising from the arrangement with creditors and took into account the prevailing market environment. For these reasons, the variable remuneration granted and paid to members of the Management Board in 2025 was reduced at the request of the entitled persons. These assumptions remain consistent with the Remuneration Policy. Pursuant to Section 4.1.2.8 of the Remuneration Policy, variable remuneration components dependent on the achievement of management objectives may be awarded or paid only where such award or payment does not adversely affect the Company's financial stability or the continuity and stability of its operations, including the fulfilment of its other obligations.

The principles described above regarding the granting and payment of total remuneration to members of the Management Board and the Supervisory Board, as well as the objectives underlying their structure during the reporting period, undoubtedly contributed to the achievement of the Company's long-term performance. Currently, the Company's primary objectives include the implementation of the arrangement, continuous improvement of financial indicators,

execution of the current business strategy, safeguarding long-term interests and stability, and further development of non-financial policies, including sustainability. The Company's financial results in recent years confirm that the effectiveness of the remuneration system is linked to these long-term outcomes. With the Company's return (following the completion of the sanitation proceedings) to standard operating conditions and the need to achieve the above long-term objectives, there has been an increased alignment between the motivational elements of Management Board remuneration and the interests of the Company.

IV. Information on how performance criteria were applied

As indicated in Sections II and III above, in 2025 remuneration was paid based on performance-related criteria. These criteria, within the Company's remuneration system, apply to variable remuneration. The Remuneration Policy provides for such criteria to cover various aspects of the Company's operations and its market environment, as described in Section III of the Report (Section 4.1.2.3 of the Remuneration Policy). Meeting the performance criteria constitutes a necessary condition for the award of additional, variable remuneration.

The Supervisory Board prepared a detailed specification of the Remuneration Policy within the meaning of Article 90d(7) of the Public Offering Act and Section 12 of the Remuneration Policy, adopted pursuant to Supervisory Board Resolution No. 2 of 24 April 2025, with respect to monetary and non-monetary benefits. According to this document, additional variable remuneration is based on both financial and non-financial criteria. Such remuneration may be determined and paid where the Company reports a net profit for a given settlement period. In that case, additional remuneration is calculated for each member of the Management Board based on net profit (taking into account the limits specified in Section 4.2 of the Remuneration Policy), according to the following criteria: 1) financial criteria: a) achievement of at least 80% of the planned revenue; b) gross margin on sales not lower than the planned level by more than 1.5 percentage points; c) net profit used for calculation is adjusted for one-off events; d) net profit increased year-on-year for the given settlement period; e) where net profit growth does not reach the planned level, the remuneration rate amounts to 40% of the rate applicable when all criteria are met; 2) non-financial criteria, assessed in terms of their impact on the Company's operations, taking into account the current business strategy and long-term interests and stability of the Company, including: a) environmental performance; b) maintenance of management systems (compliance, quality, safety, information security); c) responsible communication (internal and external); d) maintaining and improving working conditions; e) application of sustainable practices throughout the value chain; f) modernisation of the human capital management system; g) modernisation of the management system; h) increasing the share of sustainable products and services in the offering; i) conducting business in a responsible and sustainable manner. Achieving financial targets may result in awarding up to 62.5% of additional remuneration, while achieving non-financial targets may account for up to 37.5%, provided that all parameters are met. Moreover, in the above-mentioned detailed specification of the Remuneration Policy, the Supervisory Board also defined remuneration criteria with respect to non-monetary benefits. In accordance with the adopted approach, the scope of non-monetary benefits of the remuneration of the members of the Management Board includes, on a continuous basis throughout the period of serving on the Management Board: a) the right to use certain assets of the Company, in particular: i) a company car (together with coverage of the costs of: mandatory and voluntary vehicle insurance, fuel, road and motorway tolls, car wash services, operating materials and vehicle repairs), ii) communication devices (a mobile phone together with coverage of the costs of calls, data usage, internet access) and IT equipment, as well as a credit card for business expenses; b) the right to additional insurance (in particular personal and liability insurance); c) the right to use additional fringe benefits (private medical care, sports packages, per diem during business travel); d) the right to participate in training for the purpose of improving qualifications; e) the right to participate, under general conditions, in pension programmes operating within the Company (including PPK). At the same time, the Supervisory Board determined that the total annual value of non-monetary benefits granted to members of the Management Board, in addition to base remuneration, may amount to up to 50% of the total annual value of base remuneration due to members of the Management Board.

The performance-related criteria adopted in the Remuneration Policy, concerning the granting of variable components of both monetary and non-monetary remuneration, contribute to the achievement of objectives related to the implementation of the current business strategy, as well as the long-term interests and stability of the Company, as they are linked to factors aimed at increasing the Company's financial performance indicators and the continuation and development of the Company's policies in the area of non-financial objectives. Such a structure of variable remuneration criteria (including the determination of the scope and value of non-monetary benefits) aligns the motivation of the members of the Management Board with the interests of the Company. These criteria are further specified in the detailed "Remuneration Policy" within the scope defined in Article 90d(7) of the Public Offering Act and Section 12 of the Remuneration Policy. On the basis of these assumptions, the Supervisory Board applies performance-related criteria. Objectives relating to financial and non-financial criteria are presented by the Management Board and require the approval of the Supervisory Board.

The Remuneration Policy also provides a method for assessing the fulfilment of performance-related criteria, indicating in Section 4.1.2.5 that, when evaluating individual performance and the fulfilment of financial and non-financial criteria determining the level of variable remuneration, the degree of achievement of the established management objectives is taken into account. The assessment of the degree of achievement of management objectives is adjusted by a risk factor determined on the basis of the current market situation, which means that partial fulfilment of a given objective or criterion may constitute grounds for awarding variable remuneration in a reduced amount, appropriate to the level of achievement. The fulfilment of individual criteria is assessed and verified by the Supervisory Board on the basis of data contained in the Company's periodic reports, as well as on the basis of the Supervisory Board's own analyses and those of the Company's Audit Committee.

V. Information on annual changes in remuneration, the Company's performance, and the average remuneration of employees of the Company who are not members of the Management Board or the Supervisory Board, over at least the last five financial years, presented on a combined basis to enable comparison

Pursuant to Article 90g(2)(4) of the Public Offering Act, the Report includes information on the annual changes in remuneration, the Company's performance, and the average remuneration of employees who are not members of the Management Board or the Supervisory Board. This information is presented in the table below.

Comparative table of remuneration and the Company's performance over the last five reported financial years

Year-on-year change	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025
Remuneration of members of the Management Board and the Supervisory Board (in PLN thousand)						
Piotr Bieliński	497/2 658	2 658/1 624	1 624/1 491	1 491/1 254	1 254/1 539	1 539
Sławomir Harazin	466/2 634	2 634/1 601	1 601/1 473	1 473/1 171	1 171/1 410	1 410
Edward Wojtyśiak	0*/312*	312*/0*	0*/0*	0*/0*	0*/0*	0*
Iwona Bocianowska	26/31	31/38	38/47	47/50	50/50	50
Piotr Chajderowski	20/27	27/34	34/42	42/45	45/45	45
Marek Jakubowski	22/27	27/34	34/43	43/46	46/46	46
Krzysztof Kaczmarczyk	19/26	26/33	33/40	40/43	43/43	43
Adam Świtalski	20/28	28/34	34/43	43/47	47/47	47
Piotr Kosmala	2**/0*	0*/0*	0*/0*	0*/0*	0*/0*	0*
The Company's performance (net profit/loss) (in PLN thousand)						
	185 890/100 874	100 874/49 491	49 491/37 717	37 717/41 308	41 308/40 816	40 816
Average remuneration calculated on a full-time equivalent basis for employees of the Company who are not members of the Management Board or the Supervisory Board (in PLN thousand)						
	7/7,2	7,2/8,0	8,0/8,4	8,4/9,1	9,1/10,1	10,1

* A member of the body did not perform the function in a given financial year.

** Remuneration for serving on the supervisory board of a subsidiary.

VI. Amount of remuneration from entities belonging to the same capital group within the meaning of the Act of 29 September 1994 on Accounting (Journal of Laws of 2023, items 120, 295 and 1598, and of 2024, items 619, 1685 and 1863)

Below is presented information on remuneration from entities belonging to the same capital group for the reporting period (2025), together with comparative data for the previous year (2024). The data on total remuneration, presented in Section II of the Report, also include the amounts of remuneration from entities belonging to the same capital group indicated below.

Name and surname, position		Fixed remuneration			Variable remuneration		Extraordinary items	Pension costs	Total remuneration	Fixed/variable remuneration ratio
		Base salary	Charges	Additional benefits	Annual	Long-term				
PIOTR BIELIŃSKI, PRESIDENT OF THE MANAGEMENT BOARD	2025	159 494,52	0,00	0,00	0,00	0,00	0,00	5 856,00	165 350,52	100%/0%
	2024	116 820,89	0,00	0,00	0,00	0,00	0,00	5 387,52	122 208,41	100%/0%
SLAWOMIR HARAZIN, VICE-PRESIDENT OF THE MANAGEMENT BOARD	2025	56 400,00	0,00	0,00	0,00	0,00	0,00	5 504,64	61 904,64	100%/0%
	2024	51 600,00	0,00	0,00	0,00	0,00	0,00	5 036,16	56 636,16	100%/0%
BOCIANOWSKA IWONA, CHAIRWOMAN OF THE SUPERVISORY BOARD	2025	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0%/0%
	2024	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0%/0%
CHAJDEROWSKI PIOTR, MEMBER OF THE SUPERVISORY BOARD	2025	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0%/0%
	2024	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0%/0%
JAKUBOWSKI MAREK, MEMBER OF THE SUPERVISORY BOARD	2025	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0%/0%
	2024	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0%/0%
KACZMARCZYK KRZYSZTOF, MEMBER OF THE SUPERVISORY BOARD	2025	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0%/0%
	2024	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0%/0%
ŚWITALSKI ADAM, MEMBER OF THE SUPERVISORY BOARD	2025	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0%/0%
	2024	0,00	0,00	465,00	0,00	0,00	0,00	0,00	0,00	100%/0%

VII. Number of financial instruments granted or offered and the main conditions for exercising rights under those instruments, including the price and date of exercise, as well as any changes

As indicated in Sections II and III above, in 2025 no remuneration was paid in the form of financial instruments. It should be noted, however, that the Remuneration Policy provides for this form of remuneration for members of the Management Board. Pursuant to Section 4.1.5 of the Remuneration Policy, the Company may grant remuneration to members of the

Management Board in the form of financial instruments. Remuneration in the form of financial instruments may be granted during the period of serving as a member of the Management Board, and during this period the right to receive such remuneration may be acquired. With respect to financial instruments granted as a form of remuneration, time restrictions on their disposal may be introduced, not exceeding 2 years. Granting remuneration in the form of financial instruments may contribute to achieving the objectives related to the implementation of the current business strategy, as well as the long-term interests and stability of the Company, as it increases the alignment of interests of the members of the Management Board, who are also shareholders, with the interests of the Company.

VIII. Information on the use of the possibility to claim reimbursement of variable remuneration components

In 2025, the Company did not exercise the right to claim reimbursement of variable remuneration components, as during the reporting period no grounds arose for formulating such reimbursement claims.

The Remuneration Policy provides for the possibility for the Company to claim reimbursement of variable remuneration components. Pursuant to Section 4.1.2.8(b) of the Remuneration Policy, the remuneration components described are subject to reimbursement where it is determined that they were not due in the amount paid or were paid during the deferral period in accordance with the Remuneration Policy.

IX. Information on deviations from the procedure for implementing the Remuneration Policy and deviations applied in accordance with Article 90f of the Public Offering Act, including an explanation of the grounds and procedure, and an indication of the elements subject to deviations

The first Remuneration Policy was adopted by the Ordinary General Meeting of the Company pursuant to Resolution No. 12 of 30 June 2020. This took place within the time limit specified in Article 36(1) of the Act of 16 October 2019 amending the Public Offering Act and certain other acts. By Resolution No. 11 of 19 June 2024, the General Meeting of ACTION S.A. adopted a subsequent (second) version of the Remuneration Policy implemented in the Company. This decision was taken in accordance with the deadline specified in Article 90e(4) of the Public Offering Act.

The Company published the Remuneration Policy and the resolutions on its adoption on its website, in accordance with Article 90e(5) of the Public Offering Act. The Remuneration Policy itself also contains all elements specified in Articles 90d and 90f of the Public Offering Act. The Remuneration Policy is also applied to remuneration relations with members of the Management Board and the Supervisory Board.

Accordingly, during the reporting period, no deviations occurred from the procedure for implementing the Remuneration Policy.

With respect to deviations from the application of the Remuneration Policy referred to in Article 90f of the Public Offering Act (where necessary for the implementation of the Company's long-term interests and financial stability or to ensure its profitability), the Supervisory Board has not to date adopted any decision on a temporary departure from the application of the Remuneration Policy.

It should be noted that, pursuant to Sections 13.2 and 13.3 of the Remuneration Policy, the Supervisory Board may depart from its provisions in the event of a threat to the financial stability of the Company and the inability to ensure its profitability resulting from: a) failure to meet budget assumptions to a material extent; b) occurrence of force majeure events, including an epidemic, epidemic threat, or state of emergency; c) current labour market conditions that could lead to the departure of, or inability to recruit, members of the Management Board or the Supervisory Board; d) ongoing proceedings resulting in at least partial limitation of the Management Board's powers of self-management. Any departure

from the Remuneration Policy may be temporary (up to one financial year) and may concern decisions regarding remuneration other than base remuneration.

Moreover, the Remuneration Policy introduces fixed assumptions regarding the limitation of the payment of variable remuneration components. Pursuant to Section 4.1.2.8 of the Remuneration Policy, payment of these components may take place only where their allocation or payment does not adversely affect the financial stability of the Company and does not jeopardise the continuity or stability of its operations, including the fulfilment of its other obligations. During the period of the Company's sanation proceedings, the consent of the administrator was required for their payment.

X. Information on the value of monetary or non-monetary benefits granted to persons closely related to members of the Management Board and the Supervisory Board, where such benefits form part of their remuneration

In 2025, the remuneration of the President of the Management Board, Piotr Bieliński, included non-monetary benefits allowing their use by related persons in the amount of PLN 21,028.25. The value of these benefits was included in the total remuneration of the Management Board member for this period.

With respect to the remaining members of the Management Board and the Supervisory Board, such benefits did not form part of their remuneration.

XI. Information provided on the basis of estimates for financial years for which the Supervisory Board was not required to prepare a remuneration report

The information provided in the Report regarding financial years for which the Supervisory Board was not required to prepare a remuneration report is based on data contained in the published financial statements of the Company and its Capital Group.

XII. Information on personal data of members of the Management Board and the Supervisory Board

The Report does not contain personal data of members of the Management Board and the Supervisory Board referred to in Article 9(1) 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 (General Data Protection Regulation) (Official Journal of the EU L 119 of 4.05.2016, p. 1, as amended).

Zamienie, 28 April 2026

Iwona Bocianowska

Piotr Chajderowski

Adam Świtalski

Krzysztof Kaczmarczyk

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Marek Jakubowski

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