

**Current Report No:** 7/2026

**Release Date:** 15/01/2026

**Subject:** Completion of the Company's share buyback program

**Legal basis:** Other regulations

**Contents 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. 51/2024 dated 19 June 2024 and No. 60/2025 dated 17 June 2025, hereby announces that on 15 January 2026 it decided to terminate the share buyback program implemented on the basis of Resolutions No. 14 and 15 of the Annual General Meeting of ACTION S.A. dated 19 June 2024 (as amended by Resolutions No. 3 and 4 of the Extraordinary General Meeting of ACTION S.A. dated 9 January 2025 and Resolutions No. 16 and 17 of the Annual General Meeting of ACTION S.A. dated 17 June 2025 – hereinafter the “*Program*”). The decision to terminate the Program was made within the competences of the Management Board arising from §2(6)(a) of Resolution No. 14 of the Annual General Meeting of ACTION S.A. dated 19 June 2024.

The Issuer acquired treasury shares under the Program for the purpose of their redemption and reduction of the Company's share capital or for resale by the Company. As a result of all transactions carried out under the Program, the Issuer acquired a total of 2,661,088 treasury shares, carrying 2,661,088 voting rights at the Company's General Meeting.

Currently, the Issuer holds a total of 203,470 treasury shares, representing 1.4430% of the Issuer's share capital and entitling to 203,470 votes at the Company's General Meeting, which constitutes 1.4430% of the total number of votes.

The Issuer explains that the above current number of shares held by the Company and their share in the share capital and in the total number of votes results from the redemption of 2,437,000 treasury shares and the reduction of the share capital, as well as the disposal of 20,618 treasury shares (in accordance with the information published in current reports No. 75/2025 dated 27 August 2025 and No. 76/2025 dated 28 August 2025).

The total value of consideration paid in exchange for the treasury shares acquired under the Program amounts to PLN 84,497,430.97.

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).