

Current Report No.: 8/2026

Release date: 15/01/2026

Subject: Commencement of the implementation of the Company's share buyback program and determination of the detailed terms of the program.

Legal basis: Article 17(1) of MAR confidential Information

Contents of the report:

The Management Board of ACTION S.A. (hereinafter also referred to as the "*Issuer*", the "*Company*"), with reference to current report No. 7/2026 dated 15 January 2026, hereby announces that on 15 January 2026 the Issuer decided to implement a share buyback program under the authorization granted in Resolutions No. 3 and 4 of the Extraordinary General Meeting of ACTION S.A. dated 15 January 2026, and determined the detailed terms and conditions of the acquisition of treasury shares as follows:

1. The Company's own shares may be acquired for the purpose of their redemption and reduction of the Company's share capital or for resale by the Company.
2. The amount of funds allocated to the implementation of the Program shall not exceed PLN 35,100,000.
3. Under the Program, a maximum of 1,000,000 (one million) shares of the Company may be acquired.
4. The duration of the Program has been set by the Management Board for the period from 15 January 2026 to 30 September 2027, but no longer than until the funds allocated for its implementation are exhausted, or until the Management Board decides to terminate the Program or a part thereof before the above deadline, in accordance with the provisions of the Resolution.
5. The price at which the Company will acquire its own shares under the Program may not be lower than the nominal value of the shares and may not exceed PLN 35, subject to the provisions of the legal regulations indicated in section 6 below.
6. In the case of acquiring the Company's own shares in transactions on the regulated market operated by the Warsaw Stock Exchange S.A.:
 - a) transactions will be carried out in accordance with Article 5 of Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (Market Abuse Regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC, and Commission Delegated Regulation (EU) 2016/1052 of 8 March 2016 supplementing Regulation (EU) No 596/2014 with regard to regulatory technical standards for the conditions applicable to buy-back programmes and stabilisation measures;
 - b) the maximum number of shares purchased by the Company on any trading day during the Program may not exceed 25% of the average daily trading volume of the shares on the trading system, whereby the average daily trading volume shall be determined over the 20 trading days preceding the date of acquisition of the Company's shares.

7. In the case of acquiring the Company's own shares in transactions outside the regulated market operated by the Warsaw Stock Exchange S.A., the Management Board will establish separate detailed conditions for the acquisition of the Company's own shares, taking into account the provisions of the Resolution.
8. The Program will be implemented with the participation of Ipopema Securities S.A., with its registered office in Warsaw.
9. The Company plans to commence the acquisition of its own shares under the Program on 16 January 2026.

Legal basis: Article 2(1) 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.