

Current Report No.: 22/2024

Release date: 29/02/2024

Subject: Acquisition of the Company's shares under the share buyback programme.

Legal basis: Other regulations

Text of the report:

The Management Board of ACTION S.A. (hereinafter also: the "Issuer", the "Company") with reference to current report No. 97/2023 of October 26, 2023,) announces that as part of the execution of the programme of acquisition of own shares under the authorisation granted in Resolutions No. 3 and 5 of the Extraordinary General Meeting of ACTION S.A. of October 26, 2022 (taking into account their changes made on the basis of Resolutions No. 3 and 4 of the Extraordinary General Meeting of ACTION S.A. of April 14, 2023, changes made on the basis of Resolutions No. 13, 17 and 18 of the Ordinary General Meeting of ACTION S.A. of on June 21, 2023, and changes made on the basis of Resolutions No. 3 and 4 of the Extraordinary General Meeting of ACTION S.A. of October 26, 2023, as well as in accordance with the detailed conditions for purchasing own shares published in current report No. 52/2022 of October 28, 2022 and in current report No. 36/2023 of April 14, 2023, current report No. 58/2023 of June 22, 2023 and current report No. 97/2023 of October 26, 2023, the Issuer made the following acquisitions of the Company's shares (ISIN code: PLACTIN00018) in the period from February 22, 2024 to February 28, 2024 during trading sessions on the main market of the Warsaw Stock Exchange:

- on 28 February 2024, 3,839 own shares with a total value of PLN 76,552.58, at an average unit share price of PLN 19.94. These shares constitute 0.0205% of the Issuer's share capital and give the right to 3,839 votes at the Company's General Meeting, which constitutes 0.0205% of the total number of votes.

As a result of all the aforementioned transactions and the previously acquired shares, the Issuer holds a total of 1,182,557 own shares, representing 6.3113% of the Issuer's share capital, giving it the right to 1,182,557 votes at the Company's General Meeting, representing 6.3113% of the total number of votes.

The Issuer explains that the above-mentioned current number of shares held by the Company and their share in the capital share capital and the total number of votes results from the redemption of 1,300,000 treasury shares and the reduction of the share capital share capital, as published in current report No. 71/2023 of 16 August 2023.

The above transactions of purchase of own shares were carried out through Ipopema Securities S.A. based in Warsaw.

Attached hereto, the Issuer provides details of the acquisition transactions of own shares concluded between on 22 February 2024 – 28 February 2024.

Legal basis: Art. 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 of the European Parliament and of the Council on market abuse (MAR).