

Independent statutory auditor's report on the performance of the service providing reasonable assurance as to the assessment of the remuneration report

for the Shareholders and Supervisory Board of Action Spółka Akcyjna

We have been engaged to assess the attached remuneration report of Action Spółka Akcyjna (the Company) with its registered office in Zamienie for the year 2023 with regard to the completeness of the information contained therein as required by Article 90g sections 1-5 and 8 of Act of 29 July 2005 on public offerings and the terms for introducing financial instruments to an organised trading system and on public companies (consolidated text: Journal of Laws of 2022, item 2554) (Act on Public Offering).

Identification of criteria and description of the object of the service

The remuneration report has been prepared by the Supervisory Board of the Company in order to fulfil the requirements of Article 90g (1) of the Act on Public Offering. The applicable requirements for the remuneration report are contained in the Act on Public Offering.

The requirements described in the preceding sentence define the basis for the remuneration report and are, in our opinion, appropriate criteria for us to formulate a conclusion that provides reasonable assurance.

Pursuant to the requirements of Article 90g (10) of the Act on Public Offering, the remuneration report shall be subject to the auditor's assessment with respect to the inclusion of the information required pursuant to Article 90g (1) to (5) and (8) of the Act on Public Offering. This report fulfils this requirement.

The assessment of the statutory auditor, which serves as the basis for formulating of our motion with reasonable assurance, is understood as assessment as to whether, in all material respects, the scope of the information presented in the remuneration report is complete and the information has been disclosed with the level of detail required by the Act on Public Offering.

Responsibility of the members of the Supervisory Board

In accordance with the Act on Public Offering, the members of the Supervisory Board of the Company are responsible for the preparation of the remuneration report in accordance with the applicable legal provisions and, in particular, for the completeness of the report and the information contained therein.

The responsibility of the Supervisory Board also includes the design, implementation and maintenance of an internal control system that ensures the preparation of a complete remuneration report free from material misstatement due to fraud or error.

Statutory auditor's liability

Our objective was to assess the completeness of the information provided in the accompanying remuneration report against the criterion set out in the *Identification of criteria and description of the subject matter of the service* section and to express, on the basis of the evidence obtained, an independent conclusion on the assurance service performed which provides reasonable assurance.

We have performed the service in accordance with the regulations of the National Standard on Assurance Engagements Other than Audits and Reviews 3000 (Z) as set out in the International Standard on Assurance Engagements 3000 (Revised) *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*, adopted by Resolution No. 3436/52e/2019 of the National Council of Statutory Auditors of 8 April 2019, as amended (NSAE 3000 (Z)).

This standard requires the auditor to plan and perform procedures so as to obtain reasonable assurance that the remuneration report has been prepared completely in accordance with the specified criteria.

Reasonable assurance is a high level of assurance, but does not guarantee that a service performed in accordance with NSAE 3000 (Z) will always detect an existing material misstatement.

The choice of procedures depends on the auditor's judgement, including his or her estimate of the risk of material misstatement due to fraud or error. In making this risk estimate, the auditor considers the internal control relevant to the preparation of the complete report in order to plan appropriate procedures to provide the auditor with sufficient and appropriate evidence for the circumstances. The functioning of the internal control system was not assessed in order to express a conclusion on its effectiveness.

Summary of work performed and limitations of our procedures

The procedures we planned and carried out included, in particular:

- reviewing the content of the remuneration report and comparing the information contained therein to the applicable requirements,
- familiarising ourselves with the resolutions of the General Meeting of the Company concerning the remuneration policy for the members of the Management Board and Supervisory Board and the resolutions of the Supervisory Board detailing them,
- ascertaining, by comparison with corporate documents, the list of persons for whom there is a requirement to include information in the remuneration report and to determine, by enquiries of the persons responsible for preparing the report and, where we considered it appropriate, also directly of the persons for whom there is a requirement to include information, whether all the information provided for by the criteria for preparing the remuneration report has been disclosed.

Our procedures were solely intended to obtain evidence that the information included by the Supervisory Board in the remuneration report for completeness complied with the applicable requirements. The purpose of our work was not to assess the sufficiency of the information included in the remuneration report in terms of the purpose of preparing the remuneration report, nor to assess the correctness and reliability of the information contained therein, in particular as regards the amounts disclosed, including estimates made for previous years, figures, dates, allocation methods, compliance with the remuneration policy adopted.
with the adopted remuneration policy.

The remuneration report was not audited as understood in the National Auditing Standards. In the course of the assurance procedures performed, we did not audit or review the information used to prepare the remuneration report and therefore we do not accept responsibility for issuing or updating any reports or opinions on the Company's historical financial information.

We consider that the evidence we have obtained provides a sufficient and appropriate basis for our conclusion below.

Ethical requirements, including independence

While conducting the service, the auditor and the audit firm complied with the independence and other ethical requirements set out in the International Code of Ethics for Professional Accountants (including the International Standards of Independence) of the International Ethical Standards Board for Accountants, adopted by Resolution of the National Council of Statutory Auditors No. 3431/52a/2019 of 25 March 2019 on Principles of Professional Ethics for Statutory Auditors (IESBA Code). The IESBA Code is based on the fundamental rules of integrity, objectivity, professional competence and due diligence, confidentiality and professional conduct. We have also complied with the other independence and ethics requirements that apply to this assurance service in Poland.

Quality management requirements

The audit firm applies national quality control standards as adopted by Resolution of the Board of the Polish Audit Oversight Agency No. 38/I/2022 of 15 November 2022, which require the audit firm to design, implement and apply a quality management system that includes policies or procedures with respect to compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Conclusion

The auditor's conclusion is formulated based on the issued described above and should be therefore read with these issues in mind.

In our opinion, the enclosed remuneration report, in all material respects, contains all the elements listed in Article 90g(1) to (5) and (8) of the Act on Public Offering.

Limitation of application

This report has been prepared by Grant Thornton Polska Prosta Spółka Akcyjna (Grant Thornton) for the General Meeting of Shareholders and the Supervisory Board of the Company and is intended solely for the purpose described in the *Identification of criteria and description of the subject matter of the service* section. It should not be used for any other purposes.

Grant Thornton does not accept any liability in connection with this report arising from contractual or non-contractual relationships (including negligence) in respect of third parties in the context of this report. The foregoing does not relieve us of liability in situations where such disclaimer is excluded by law.

Paweł Zaczyński

Signed by:

Paweł Tomasz Zaczyński

Date:

2024-05-22 17:28

Statutory Auditor No. 13290 carrying out the service on behalf of
Grant Thornton Polska Prosta spółka akcyjna,
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