

Notice Regarding Off-Auction Distributions of Shares

August 7, 2025

Company name: ZERO CO., LTD. Code No: 9028 (Tokyo Stock Exchange Standard Section)

Representative: CEO & President - Toshihiro Takahashi

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We hereby announce that off-auction distributions of our shares are scheduled as follows.

- 1. Number of shares to be distributed: 662,000 shares
- 2. Scheduled period of distribution: Tuesday, August 19, 2025 to Friday, August 22, 2025
- 3. Distribution price: To be determined based on the closing price or the final quotation on the day prior to the distribution date.
- 4. Limit on the number of shares to be purchased: 4,000 shares per customer (trading unit: 100 shares)
- 5. Stock Exchange: Tokyo Stock Exchange
- 6. Distribution Purpose: To improve the liquidity of the shares in order to meet the criteria for maintaining the listing on the TSE Standard Market. As a result of this off-auction distribution as well as the disposal of treasury stock through a third-party allotment in connection with the additional contribution to the share delivery trust (BBT and BBT-RS) disclosed today, we estimate the liquidity of the shares is expected to reach 25% or more. We have also confirmed the intention of the selling shareholder regarding this distribution.

Off-auction distributions may be cancelled or postponed due to sudden stock market fluctuations or other reasons.