

## **Notice Regarding Implementation of Off-Auction Distribution of Shares**

August 18, 2025

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

Representative: CEO & President - Toshihiro Takahashi

Contact for Inquiries: Corporate Officer, General Manager of Corporate Strategy Division -  
Takashi Date

Telephone: +81(44) 520-0106

We hereby announce the implementation of an off-auction distribution of our shares as outlined below.

1. Number of Shares to be Distributed: 662,000 shares
2. Distribution Date: August 19, 2025 (Tuesday)
3. Distribution Price: 3,056 yen
4. Limit on Purchase Application Quantity: 4,000 shares per purchasing customer (trading unit: 100 shares)
5. Stock Exchange for Implementation: Tokyo Stock Exchange
6. Purpose of Implementation:

To enhance the liquidity of our shares in order to comply with the tradable share ratio requirement, which is one of the listing maintenance criteria for the TSE Standard Market. With this off-auction distribution, as well as the disposal of treasury stock through third-party allotment associated with the additional contributions to the Stock Benefit Trust (BBT and BBT-RS) disclosed on August 7, 2025, our company estimates that the tradable share ratio will reach 25% or higher. We have also confirmed the intention of the selling shareholder regarding the distribution.

[For Reference]

Calculation of Distribution Price

Reference Date and Price: Closing price on August 18, 2025 (Monday): 3,150 yen

Discount Rate: 2.98%