Notice Regarding Completion of Off-Auction Distribution of Shares

August 19, 2025

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

Representative: CEO & President - Toshihiro Takahashi

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Takashi Date

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We hereby announce that the off-auction distribution of our shares, which was announced on August 18, 2025, has been carried out as outlined below, and the distribution has now been completed.

1. Number of Shares Distributed: 662,000 shares

2. Distribution Date: August 19, 2025 (Tuesday)

3. Distribution Price: 3,056 yen

4. Maximum Number of Shares per Applicant: 4,000 shares

[For Reference]

Number of Shares Planned for Distribution: 662,000 shares

Distribution Date: August 19, 2025 (Tuesday)

Distribution Price: 3,056 yen

Purchase Application Limit: 4,000 shares per purchasing customer (trading unit: 100 shares) Implementing Exchange: Tokyo Stock Exchange

Purpose: 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. Following 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.