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May 9, 2025

Company name:	PAL GROUP Holdings CO., LTD.
Name of representative:	Isamu Matsuo Chairman and Representative Director (Securities code: 2726; TSE Prime Market)
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## Notice Concerning Determination of Matters Relating to Repurchase of Own Shares

(Repurchase of Own Shares Under the Articles of Incorporation Pursuant to Article 165,

Paragraph (2) of the Companies Act of Japan)

PAL GROUP Holdings CO., LTD. (the “Company”) hereby announces that a resolution was adopted by the Board of Directors held on May 9, 2025, the matters concerning the repurchase of its own shares in accordance with Article 156 of the Companies Act of Japan applied by replacing terms pursuant to the provisions of Article 165, paragraph (3) of the Act as described below.

### 1. Reason for repurchase of own shares

On May 9, 2025, the Company resolved to carry out a secondary offering of shares of common stock of the Company (the “Secondary Offering”) with the aim of expanding and diversifying the shareholder base. In order to enhance shareholder returns and improve capital efficiency, while enabling flexible capital policies in the future, and mitigate the short-term impact on supply and demand of its common stock as a result of carrying out the Secondary Offering and lessen the impact on existing shareholders, the Company resolved to carry out the repurchase of own shares.

For details regarding the Secondary Offering, please refer to the “Notice Concerning Secondary Offering of Shares” dated May 9, 2025.

### 2. Details of the matters relating to repurchase

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|---|--|
| (1) Class of shares to be repurchased:        | Common stock of the Company  |
| (2) Total number of shares to be repurchased: | 750,000 shares (maximum)<br>(0.86% of total number of issued shares (excluding treasury shares))   |
| (3) Total amount of repurchase price:         | 2,000,000,000 yen (maximum)  |
| (4) Repurchase period:                        | A period between the business day following the settlement date of the Secondary Offering (the sixth business day following the Pricing Date), which is expected to be determined according to the |

Disclaimer: This document is a press release to announce the determination of matters relating to repurchase of own shares and has not been prepared for the purpose of soliciting investments whether in or outside Japan. Additionally, this press release does not constitute an offer of securities for sale, nor a solicitation of an offer to buy, in the United States or elsewhere. The securities referred to above have not been and will not be registered under the United States Securities Act of 1933, as amended (the “Securities Act”) and may not be offered or sold in the United States absent registration or an exemption from registration under the Securities Act. The securities referred to above will not be publicly offered or sold in the United States.

Pricing Date of the Secondary Offering (a certain date between Monday, May 19, 2025 and Wednesday, May 21, 2025) and Friday, August 29, 2025 (Note 3).

(5) Repurchase method: Market purchase on the Tokyo Stock Exchange, Inc.

- (Notes)
1. Due to market trends and other factors, part or all of the shares may not be repurchased.
  2. If the Secondary Offering is canceled, the repurchase of own shares will also be canceled.
  3. If the Pricing Date is Monday, May 19, 2025, the start date of repurchase period is Tuesday, May 27, 2025  
If the Pricing Date is Tuesday, May 20, 2025, the start date of repurchase period is Wednesday, May 28, 2025  
If the Pricing Date is Wednesday, May 21, 2025, the start date of repurchase period is Thursday, May 29, 2025

[Reference]

Status of treasury shares as of February 28, 2025

- Total number of issued shares (excluding treasury shares): 86,823,133 shares
- Number of treasury shares: 5,720,867 shares

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