



September 1, 2025

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(Securities code: 2726; TSE Prime Market)  
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## Notice Concerning the Status and Completion of the Share Repurchase

(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 the status of repurchase of its own shares in accordance with Article 156 of the Companies Act of Japan (“the Act”) applied by replacing terms pursuant to Article 165, Paragraph (3) of the Act, which was resolved at the Board of Directors held on May 9, 2025. The Company also announces that the repurchase of its own shares has been completed.

- |   |   |
|---|---|
| (1) Class of shares repurchased:        | Common stock of the Company                       |
| (2) Total number of shares repurchased: | 0 shares  |
| (3) Total amount of repurchase price:   | 0 yen   |
| (4) Repurchase period:                  | May 27, 2025, to August 29, 2025                  |
| (5) Repurchase method:                  | Market purchase on the Tokyo Stock Exchange, Inc. |

### [Reference]

#### 1. Details of the matters relating to repurchase of own shares resolved by the Board of Directors held on May 9, 2025

- |   |  |
|---|--|
| (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:                        | Tuesday, May 27, 2025 to Friday, August 29, 2025   |
| (5) Repurchase method:                        | Market purchase on the Tokyo Stock Exchange, Inc.  |

(Note) Due to market trends and other factors, part or all of the shares may not be repurchased.

#### 2. The total number of shares repurchased as of August 29, 2025 in accordance with the above resolution

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|---|----------|
| (1) Total number of shares repurchased: | 0 shares |
| (2) Total amount of repurchase price:   | 0 yen    |

#### 3. Reason for Zero Shares Acquired

We hereby report that the number of shares acquired under our share repurchase program was zero, due to the following reasons, taking into account the market conditions after the establishment of the repurchase framework.

In our initial press release, we stated the following rationale for setting up the share repurchase framework:

On May 9, 2025, our Board of Directors resolved to conduct a secondary offering of our shares (hereinafter referred to as the “Offering”) with the aim of expanding and diversifying our shareholder base. In light of this, and in order to enhance

shareholder returns, improve capital efficiency, and enable flexible capital policies in the future, we planned to repurchase shares. This initiative was also intended to mitigate the short-term impact on supply and demand resulting from the Offering and to reduce the effect on our existing shareholders.

#### Share Repurchase Status and Future Outlook

Following the commencement of the share repurchase period (effectively starting June 1, as purchases were prohibited from May 27 to 30 due to the fiscal year-end), the closing price fell below the offering price of ¥3,550 on only five days. For the most part, the stock traded above ¥3,550, and therefore did not reach the price level we had envisioned as a safety net.

- As a result, after considering factors such as improving stock liquidity and enhancing capital efficiency, we ultimately decided not to proceed with the share repurchase.
- Regarding future share repurchases, we will continue to carefully assess market conditions and the status of our capital policy, and consider appropriate timing and methods.