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To whom it may concern

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Notice Concerning Disposal of Treasury Shares as Restricted Stock Compensation

COMSYS Holdings Corporation (hereinafter referred to as the “Company”) hereby announces that at the Board of Directors meeting held today, the Company resolved to conduct a disposal of treasury shares as restricted stock compensation (hereinafter referred to as the “Disposal of Treasury Shares”), as described below.

1. Overview of disposal

(1) Date of disposal	July 22, 2025
(2) Class and number of shares to be disposed of	Common stock of the Company: 104,654 shares
(3) Disposal price	¥3,264 per share
(4) Total disposal value	¥341,590,656
(5) Method of offering or allotment	Method of allotting specified restricted stock
(6) Method of fulfilling capital contribution	Contribution in kind using monetary remuneration claims
(7) Individuals eligible for allotment: number of eligible individuals: number of shares to be allotted	(Continuous-Service-Linked Restricted Stock Compensation Plan) Directors (excluding Directors who are Audit and Supervisory Committee Members and Outside Directors) of the Company and Directors of wholly owned subsidiaries of the Company: 45: 25,793 shares (Performance-Linked Restricted Stock Compensation Plan) Directors (excluding Directors who are Audit and Supervisory Committee Members and Outside Directors) of the Company and Directors and Executive Officers of wholly owned subsidiaries of the Company: 122: 78,861 shares
(8) Other	With respect to the Disposal of Treasury Shares, the Company has filed an Extraordinary Report based on the Financial Instruments and Exchange Act.

2. Purpose and reason for disposal

(Continuous-Service-Linked Restricted Stock Compensation Plan)

At the Board of Directors meeting held on May 13, 2020, the Company resolved to introduce a new Restricted Stock Compensation Plan (hereinafter referred to as the “Continuous-Service-Linked Restricted Stock Compensation Plan” or the “Plan (I)”) for the purpose of providing an incentive for Directors (excluding Directors who are Audit and Supervisory Committee Members and Outside Directors; hereinafter referred to as the “Eligible Directors”) of the Company to sustainably increase the Company’s corporate value and to further promote shared value between Directors and shareholders. In addition, at the 17th Ordinary General Meeting

of Shareholders held on June 26, 2020, it was approved that, based on the Plan (I), the total amount of monetary compensation claims to be paid to the Eligible Directors shall be not more than 100 million yen per year and the total number of common shares of the Company to be issued or disposed of that the Eligible Directors will receive shall be not more than 40,000 shares per year, with a transfer restriction period of 30 years.

Furthermore, having received approval for the Plan (I) for the Eligible Directors at the Ordinary General Meeting of Shareholders of the Company, it was decided that the same plan would also be introduced for Directors of wholly owned subsidiaries of the Company.

(Performance-Linked Restricted Stock Compensation Plan)

At the Board of Directors meeting held on May 9, 2025, the Company resolved to introduce a Performance-Linked Restricted Stock Compensation Plan (hereinafter referred to as the “Plan (II)”) for the Eligible Directors with the aim of further clarifying the linkage between the compensation and performance of the Eligible Directors and the share value of the Company, raising awareness of contribution to the Company’s medium- to long-term business performance and enhancement of corporate value, and further promoting the sharing of benefits with shareholders by encouraging the Eligible Directors to own the Company’s shares. In addition, the Company received approval at the 22nd Ordinary General Meeting of Shareholders held on June 27, 2025, to newly introduce the Plan (II) whereby, within the remuneration limit of 400 million yen per year approved at the 14th Ordinary General Meeting of Shareholders held on June 29, 2017, and separately from the remuneration limit under the Plan (I), the total amount of monetary compensation claims to be paid to the Eligible Directors shall be not more than 100 million yen per year and the total number of common shares of the Company to be issued or disposed of that the Eligible Directors will receive shall be not more than 40,000 shares per year, with a transfer restriction period from the date of allotment until the time immediately after their retirement from the position of Director (excluding Directors who are Audit and Supervisory Committee Members and Outside Directors) of the Company or the time determined by the Board of Directors of the Company, whichever comes later.

Furthermore, having received approval for the Plan (II) for the Eligible Directors at the Ordinary General Meeting of Shareholders of the Company, it was decided that the same plan would also be introduced for Directors and Executive Officers of wholly owned subsidiaries of the Company.

Today, at meetings of the Board of Directors of the Company and its wholly owned subsidiaries, it was resolved to, for the Plan (I), pay monetary compensation claims totaling 84,188,352 yen to 45 Eligible Directors and Directors of wholly owned subsidiaries of the Company (hereinafter referred to as the “Eligible Directors, etc. (I)”), with the Eligible Directors, etc. (I) using all monetary compensation claims as contribution in kind for receiving an allotment of 25,793 common shares of the Company as restricted shares (hereinafter referred to as the “Allotted Shares (I)”), and for the Plan (II), pay monetary compensation claims totaling 257,402,304 yen to 122 Eligible Directors and Directors and Executive Officers of wholly owned subsidiaries of the Company (hereinafter referred to as the “Eligible Directors, etc. (II)”); hereinafter Eligible Directors, etc. (I) and Eligible Directors, etc. (II) are collectively referred to as the “Eligible Directors, etc.”), with the Eligible Directors, etc. (II) using all monetary compensation claims as contribution in kind for receiving an allotment of 78,861 common shares of the Company as restricted shares (hereinafter referred to as the “Allotted Shares (II)”). The amount of monetary compensation claims for the Eligible Directors, etc. will be determined after comprehensive consideration of such factors as the performance of the Company and its wholly owned subsidiaries, the responsibilities of the Eligible Directors, etc., and various other factors. The monetary compensation claims are paid on condition that the Eligible Directors, etc. enter into a Restricted Stock Allotment Agreement with the Company (hereinafter referred to as the “Allotment Agreement”) that includes the following content.

3. Overview of the Allotment Agreement

(Continuous-Service-Linked Restricted Stock Compensation Plan)

(i) Transfer restriction period

July 22, 2025 to July 21, 2055 (hereinafter referred to as the “Transfer Restriction Period (I)”)

(ii) Lifting of transfer restrictions

The Company shall lift the transfer restrictions of all the Allotted Shares (I) upon expiration of the Transfer Restriction Period (I) on the condition that the Eligible Director, etc. (I) who received the allotment of restricted shares has remained in the position of Director (excluding Directors who are Audit and Supervisory Committee Members and Outside Directors) of the Company or Director of wholly owned subsidiaries of the Company throughout the Transfer Restriction Period (I).

However, if the Eligible Director, etc. (I) loses the aforementioned position before the expiration of the Transfer Restriction Period (I) due to the reason the Board of Directors of the Company deems justifiable, the Company shall rationally adjust the number of the Allotted Shares (I) on which the transfer restrictions are to be lifted and the timing of lifting as needed.

(iii) Acquisition of restricted shares without contribution

If an Eligible Director, etc. (I) who received the allotment of restricted shares loses the position as Director (excluding Directors who are Audit and Supervisory Committee Members and Outside Directors) of the Company or Directors of wholly owned subsidiaries of the Company before the Transfer Restriction Period (I) expires, the Company shall automatically acquire such Allotted Shares (I) without contribution, unless there is a reason that is deemed justifiable by the Board of Directors of the Company.

In addition, the Company shall automatically acquire, without contribution, the Allotted Shares (I) whose transfer restrictions have not been lifted in accordance with the provisions on the grounds for releasing the transfer restriction in (ii) when the Transfer Restriction Period (I) prescribed in (i) expires.

(iv) Treatment during reorganization, etc.

If, during the Transfer Restriction Period (I), matters relating to a merger agreement in which the Company is the disappearing company, a share exchange agreement or share transfer plan in which the Company becomes a wholly owned subsidiary, or other reorganization, etc. are approved at the Company's General Meeting of Shareholders (or at a meeting of its Board of Directors in cases where approval at the Company's General Meeting of Shareholders is not required in relation to the reorganization, etc., or by decision of an Executive Officer delegated pursuant to the provisions of Article 416, Paragraph 4 of the Companies Act or a Director delegated pursuant to the provisions of Article 399-13, Paragraph 5 of the Companies Act), the Company shall lift the transfer restrictions on the Allotted Shares (I) with the number of shares that is reasonably determined considering the period from the start date of the Transfer Restriction Period (I) to the date of approval of the reorganization, etc. prior to the date on which the reorganization, etc. becomes effective, by resolution of the Board of Directors of the Company. In cases specified above, the Company shall automatically acquire without contribution the Allotted Shares (I) on which the transfer restrictions have not been lifted as of the time immediately after the transfer restrictions were lifted.

(v) Management of the Allotted Shares (I)

So that the Allotted Shares (I) cannot be transferred, used to create security interests, or disposed of in any other way during the Transfer Restriction Period (I), they will be managed in dedicated accounts opened by the Eligible Directors, etc. (I) at Mitsubishi UFJ Morgan Stanley Securities Co., Ltd.

(Performance-Linked Restricted Stock Compensation Plan)

(i) Transfer restriction period

For the period from July 22, 2025, until the time immediately after their retirement from the position of Director (excluding Directors who are Audit and Supervisory Committee Members and Outside Directors) of the Company or as Director and Executive Officer of wholly owned subsidiaries of the Company, or the time at which the semi-annual report of the Company for the fiscal year that includes the date on which the Allotted Shares (II) were allotted is submitted, whichever comes later (hereinafter referred to as the "Transfer Restriction Period (II)"), the Allotted Shares (II) received under the Restricted Stock Allotment Agreement may not be transferred to a third party, pledged, used to create transferrable security interests, given as living gifts or bequests, or otherwise disposed of in any way.

(ii) Lifting of transfer restrictions

The Company shall lift the transfer restrictions of the number of shares in accordance with the degree of achievement of the performance targets set in advance by the Board of Directors of the Company, including consolidated operating profit, for the performance evaluation period set by the Company upon expiration of the Transfer Restriction Period (II), on the condition that the Eligible Director, etc. (II) who received the allotment of restricted shares has remained in the position of Director (excluding Directors who are Audit and Supervisory Committee Members and Outside Directors) of the Company or Director and Executive Officer of wholly owned subsidiaries of the Company throughout the Transfer Restriction Period (II). However, if the performance target is not achieved, the Company will acquire a portion of the Allotted Shares (II) without contribution after the end of the performance evaluation period in accordance with (iii) below. In addition, if the Eligible Directors, etc. (II) lose their position as Directors (excluding Directors who are Audit and Supervisory Committee Members and Outside Directors) of the Company or Directors and Executive Officers of wholly owned subsidiaries of the Company before the expiration of the Transfer Restriction Period (II) due to the reason the Board of Directors of the Company deems

justifiable, the Company shall rationally adjust the number of the Allotted Shares (II) on which the transfer restrictions are to be lifted, and the timing of lifting as needed.

(iii) Acquisition of restricted shares without contribution

The Company will acquire a portion of the Allotted Shares (II) without contribution if the performance target is not achieved after the end of the performance evaluation period. If an Eligible Director, etc. (II) who received the allotment of restricted shares loses the position as Director (excluding Directors who are Audit and Supervisory Committee Members and Outside Directors) of the Company or Director and Executive Officer of wholly owned subsidiaries of the Company before the Transfer Restriction Period (II) expires, the Company shall automatically acquire such Allotted Shares (II) without contribution, unless there is a reason that is deemed justifiable by the Board of Directors of the Company. The Company shall automatically acquire, without contribution, the Allotted Shares (II) whose transfer restrictions have not been lifted in accordance with the provisions on the grounds for releasing the transfer restriction in (ii) when the Transfer Restriction Period (II) prescribed in (i) expires.

(iv) Treatment during reorganization, etc.

If, during the Transfer Restriction Period (II), matters relating to a merger agreement in which the Company is the disappearing company, a share exchange agreement or share transfer plan in which the Company becomes a wholly owned subsidiary, or other reorganization, etc. are approved at the Company's General Meeting of Shareholders (or at a meeting of its Board of Directors in cases where approval at the Company's General Meeting of Shareholders is not required in relation to the reorganization, etc.), the Company shall lift the transfer restrictions on the Allotted Shares (II) with the number of shares that is reasonably determined considering the period from the start date of the Transfer Restriction Period (II) to the date of approval of the reorganization, etc. prior to the date on which the reorganization, etc. becomes effective, by resolution of the Board of Directors of the Company. In cases specified above, the Company shall automatically acquire without contribution the Allotted Shares (II) on which the transfer restrictions have not been lifted as of the time immediately after the transfer restrictions were lifted.

(v) Management of the Allotted Shares (II)

So that the Allotted Shares (II) cannot be transferred, used to create security interests, or disposed of in any other way during the Transfer Restriction Period (II), they will be managed in dedicated accounts opened by the Eligible Directors, etc. (II) at Mitsubishi UFJ Morgan Stanley Securities Co., Ltd.

4. Basis for calculation of the amount to be paid in and specific details thereof

In order to eliminate any arbitrariness in the price, the issue price will be the closing price of 3,264 yen for the Company's common shares on the Tokyo Stock Exchange on June 26, 2025 (the business day immediately preceding the date of resolution of the Board of Directors). This represents the market price immediately preceding the date of resolution of the Board of Directors and is considered to be a reasonable and not particularly advantageous price.