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February 6, 2026

To whom it may concern,

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Name of representative: Hiroshi Tanabe,  
President, Representative Director  
(Securities code: 1721; Prime Market  
of the Tokyo Stock Exchange)  
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## Notice Concerning the Disposal of Treasury Shares upon the Introduction of Share Delivery System

At the Board of Directors meeting held today, COMSYS Holdings Corporation ("the Company") resolved to dispose of treasury shares upon the introduction of Share Delivery System (hereinafter referred to as "the Disposal of Treasury Shares"). The Company hereby announce the details as follows.

### 1. Outline of the disposal

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| (1) Date of disposal                          | February 27, 2026  |
| (2) Class and number of Shares to be disposed | Common shares of the Company 266,500 shares  |
| (3) Disposal price                            | 4,973 yen per share  |
| (4) Total disposal value                      | 1,325,304,500 yen  |
| (5) Planned transferee                        | The Master Trust Bank of Japan, Ltd.<br>(ESOP trust account for share grant)   |
| (6) Other                                     | The Company has submitted an extraordinary report based on the Financial Instruments and Exchange Act regarding the Disposal of Treasury Shares. |

### 2. Purpose and reason for disposal

At the Board of Directors meeting held today, the Company received the approval to introduce the Share Delivery System for employees of the Company and its subsidiaries (excluding non-residents in Japan, hereinafter referred to as "Eligible Employees.") utilizing the Employee Stock Ownership Plan (ESOP) trust (hereinafter referred to as the "ESOP Trust") for Eligible Employees with the aim of raising the awareness of Eligible Employees to contribute to the Company's business performance and improving employee engagement. For details of ESOP Trust, please refer to "Notice Concerning the Finalization of Details of Share Delivery System for Employees of COMSYS Holdings Corporation and Its Subsidiaries" announced today.

In conjunction with the introduction of ESOP Trust, the treasury shares will be disposed of to the Master Trust Bank of Japan, Ltd. (ESOP trust account for share grant), which is the co-trustee of the ESOP Trust

Agreement for Share Grant to be concluded between the Company and Mitsubishi UFJ Trust and Banking Corporation.

The number of shares to be disposed is the number of shares that are expected to be granted to Eligible Employees during the trust period in accordance with the share grant regulations, and the scale of dilution will be 0.20% (Round to two decimal places with standard rounding. Ratio to the total number of voting rights of 1,160,852 as of September 30, 2025, is 0.23%.) of the total number of issued shares.

The Company's shares allotted through the Disposal of Treasury Shares will be delivered to Eligible Employees in accordance with the share grant regulations, and since it is not expected that shares resulting from the Disposal of Treasury Shares will flow out to the stock market at one time, the Company has judged that the impact on the stock market will be minimal and that the number of shares to be disposed and the scale of dilution are reasonable.

### 3. Basis of calculation of disposal value and specific details thereof

The disposal price is set at 4,973 yen, which is the closing price of the Company's shares on the Tokyo Stock Exchange, Inc. (hereinafter referred to as the "Tokyo Stock Exchange") on the business day immediately preceding the date of the resolution of the Board of Directors meeting concerning the Disposal of Treasury Shares (February 5, 2026), in order to make the disposal price without arbitrariness in light of recent trends in share prices. The Company has decided to adopt this price because it is the market price immediately before the resolution of the Board of Directors meeting and it is judged to be highly objective and reasonable as the basis of calculation.

Regarding the above disposal price, the Audit and Supervisory Committee (It consists of six members. Five of them are outside directors) expressed its opinion that the basis for calculating the disposal price is reasonable and does not apply to a particularly favorable disposal price.

### 4. Procedures under the Code of Conduct

Since the dilution ratio of shares resulting from the Disposal of Treasury Shares is less than 25% and there will be no change in controlling shareholders, the procedures for obtaining an opinion from an independent third party and confirmation of shareholders' intentions as prescribed in Article 432 of the Securities Listing Regulations of the Tokyo Stock Exchange are not required.