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September 29, 2026

Company Name	freee K.K.
Representative	Daisuke Sasaki, CEO and Representative Director
Code No.	4478, Tokyo Stock Exchange Growth
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Announcement Regarding Disposal of Treasury Stock as Restricted Shares and Under the Performance-linked Stock Compensation Plan

freee K.K. (the “Company”) announces that, at the Board of Directors’ meeting held today, the Board of Directors separately resolved to carry out the disposal of treasury stock as restricted shares and the disposal of treasury stock based on the Performance-linked Stock Compensation Plan, as described below. Of the disposals of treasury stock as restricted shares, the disposal set forth in Section 1.1 below is referred to as “Disposal of Treasury Stock ①” and the disposal set forth in Section 1.2 below as “Disposal of Treasury Stock ②.” The disposal of treasury stock based on the Performance-linked Stock Compensation Plan is referred to as “Disposal of Treasury Stock ③” and, together with Disposal of Treasury Stock ① and Disposal of Treasury Stock ②, as the “Disposals of Treasury Stock.”

1. Overview of the Disposals of Treasury Stock

1. Disposal of Treasury Stock ①

(1) Pay-in date	October 28, 2026
(2) Type and number of shares to be disposed of	74,841 common shares of the Company
(3) Disposal price of shares	JPY 3,620 per share
(4) Total disposal price	JPY 270,924,420
(5) Allottees	8,288 shares to be allocated to 2 Directors* of the Company 2,487 shares to be allocated to 3 Directors serving as members of the Audit and Supervisory Committee 64,066 shares to be allocated to 6 officers and employees of the Company and its subsidiaries other than the above * Except Directors serving as members of the Audit and Supervisory Committee and Outside Directors
(6) Other	For Disposal of Treasury Stock ①, an extraordinary report has been submitted as required under the Financial Instruments and Exchange Act.

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2. Disposal of Treasury Stock ②

(1) Pay-in date	October 28, 2026
(2) Type and number of shares to be disposed of	11,649 common shares of the Company
(3) Disposal price of shares	JPY 3,620 per share
(4) Total disposal price	JPY 42,169,380
(5) Allottees	11,649 shares to be allocated to 3 employees of the Company
(6) Other	For Disposal of Treasury Stock ②, a Securities Notice has been submitted as required under the Financial Instruments and Exchange Act.

3. Disposal of Treasury Stock ③

(1) Pay-in date	October 28, 2026
(2) Type and number of shares to be disposed of	10,478 common shares of the Company
(3) Disposal price of shares	JPY 3,620 per share
(4) Total disposal price	JPY 37,930,360
(5) Allottees	7,858 shares to be allocated to 2 Directors* of the Company 2,620 shares to be allocated to 1 officer or employee of the Company other than the above * Except Directors serving as members of the Audit and Supervisory Committee and Outside Directors

2. Purposes and Reasons for the Disposals of Treasury Stock

1. Disposal of Treasury Stock ① and Disposal of Treasury Stock ②

At the Board of Directors' meeting held on August 30, 2021, the Company implemented a restricted share compensation plan (the "Restricted Share Compensation Plan") as a new compensation plan with the aims of encouraging Directors of the Company (except Directors serving as members of the Audit and Supervisory Committee and External Directors) to achieve sustainable growth in the Company's corporate value and to promote a greater sense of shared value with shareholders, and encouraging Directors serving as members of the Audit and Supervisory Committee to prevent impairment of the Company's corporate value and maintain the Company's credibility by sharing the same values as shareholders of the Company. Furthermore, the 9th Ordinary General Meeting of Shareholders held on September 29, 2021 and the 13th Ordinary General Meeting of Shareholders held on September 26, 2025 approved the payment of monetary compensation receivables of up to JPY 100,000,000 per year to Directors (except Directors serving as members of the Audit and Supervisory Committee and External Directors) and up to JPY 20,000,000 per year to Directors serving as members of the Audit and Supervisory Committee as property contributed in kind for the grant of restricted shares under the Restricted Share Compensation Plan, separately from the existing monetary compensation limit and the Performance-linked Stock Compensation Plan (defined in subsection 2 below), and a transfer restriction period of three years.

An overview of the Restricted Share Compensation Plan is provided below.

<Overview of the Restricted Share Compensation Plan>

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The Directors of the Company will pay in all of the monetary compensation receivables granted by the Company under the Restricted Share Compensation Plan as property contributed in kind, and will receive common shares of the Company to be issued or disposed of by the Company in exchange for the in-kind contribution.

The maximum total number of common shares of the Company issued or disposed of under the Restricted Share Compensation Plan is set at 67,000 shares per year for Directors (except Directors serving as members of the Audit and Supervisory Committee and External Directors) and 13,400 shares per year for Directors serving as members of the Audit and Supervisory Committee, separately from the Performance-linked Stock Compensation Plan. The pay-in amount per share will be determined by the Board of Directors within a range that is not particularly favorable to the receiving Directors, based on the closing price of the Company's common shares on the Tokyo Stock Exchange on the business day prior to the relevant resolution of the Board of Directors (or the closing price on the immediately preceding trading day if no trading takes place on that day).

Upon the issuance or disposal of common shares of the Company under the Restricted Share Compensation Plan, the Company and the receiving Directors will enter into a restricted share allocation agreement which stipulates that:

① The receiving Directors shall not transfer, pledge as collateral, or otherwise dispose of the allocated common shares of the Company for a predetermined period; and

② The Company shall acquire those common shares without compensation in certain circumstances.

The Company has also implemented a similar restricted share compensation plan for its Executive Officers and employees. In addition, the Company's subsidiaries have implemented similar restricted share compensation plans for their directors and employees.

2. Disposal of Treasury Stock ③

At the 9th Ordinary General Meeting of Shareholders held on September 29, 2021, the Company implemented a performance-linked stock compensation plan (the "Performance-linked Stock Compensation Plan") as a new compensation plan for Directors of the Company (except Directors serving as members of the Audit and Supervisory Committee and External Directors; the "Directors Eligible for Performance-linked Stock Compensation") to achieve sustainable growth in the Company's corporate value and to promote a greater sense of shared value with shareholders. Furthermore, the 9th Ordinary General Meeting of Shareholders held on September 29, 2021, the 12th Ordinary General Meeting of Shareholders held on September 27, 2024, and the 13th Ordinary General Meeting of Shareholders held on September 26, 2025 approved, among other matters, that the total amount of monetary compensation receivables granted to Directors Eligible for Performance-linked Stock Compensation as performance-linked stock compensation under the Performance-linked Stock Compensation Plan shall be up to JPY 100,000,000 per year, separately from the existing monetary compensation limit and the Restricted Share Compensation Plan, and that the total number of common shares of the Company issued or disposed of to Directors Eligible for Performance-linked Stock Compensation under the Performance-linked Stock Compensation Plan shall be up to 67,000 shares per year, separately from the Restricted Share Compensation Plan. However, if a share split of the Company's common shares (including a gratis allotment of the Company's common shares), a reverse share split of the Company's common shares, or any other event requiring an adjustment to the total number of common shares to be issued or disposed of occurs, that total number shall be adjusted within a reasonable range.

An overview of the Performance-linked Stock Compensation Plan is provided below.

<Overview of the Performance-linked Stock Compensation Plan>

Under the Performance-linked Stock Compensation Plan, Directors Eligible for Performance-linked Stock Compensation receive, after the end of each one-year fiscal period from July 1 to June 30 of the

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following year (the “Evaluation Period”), the number of common shares of the Company calculated using the formula below, depending on factors including whether performance targets for the Evaluation Period have been achieved and other relevant factors. To provide a clearer incentive for sustainable growth in corporate value, shares delivered after the end of the Evaluation Period are, in principle, subject to a transfer restriction period ending on the date on which three years have elapsed from the last day of the Evaluation Period. The Company will enter into a restricted share allocation agreement with Directors Eligible for Performance-linked Stock Compensation, principally containing the provisions described below.

【Calculation Formula】

Number of restricted shares (RS) to be delivered to Directors Eligible for Performance-linked Stock Compensation = Base Number of Shares to be Delivered (①) × Payout Rate (②)

① The “Base Number of Shares to be Delivered” will be determined by the Company’s Board of Directors according to the position, responsibilities, and other relevant factors of each Director Eligible for Performance-linked Stock Compensation.

② The “Payout Rate” will be either 0% or 100%, depending on whether the performance indicators determined by the Company’s Board of Directors for the Evaluation Period have been achieved (no shares will be delivered if the specified performance indicators have not been achieved).

The Company has also implemented a similar performance-linked stock compensation plan for some of its Executive Officer.

3. Disposal of Treasury Stock

In consideration of the purposes of the Restricted Share Compensation Plan, the Company’s business performance, the extent of the duties of each Eligible Allottee and other relevant circumstances, the Company has resolved to allocate 74,841 common shares of the Company (the “Allocated Shares ①”) through Disposal of Treasury Stock ① in exchange for an in-kind contribution totaling JPY 270,924,420 (the amount of monetary (compensation) receivables contributed per share: JPY 3,620), consisting of (i) monetary (compensation) receivables against the Company granted to 2 Directors of the Company (except Directors serving as members of the Audit and Supervisory Committee and External Directors) based on a resolution adopted at the Company’s Board of Directors’ meeting held today; (ii) monetary (compensation) receivables against the Company granted to 3 Directors serving as members of the Audit and Supervisory Committee based on deliberations among those Directors held today; and (iii) monetary (compensation) receivables granted to 6 officers and employees of the Company and its subsidiaries other than those listed above based on a resolution adopted at the Company’s Board of Directors’ meeting held today and decisions by the directors of the Company’s subsidiaries made today (the persons in (i) through (iii) are collectively referred to as the “Eligible Allottees ①”).

The Company has also resolved to grant monetary receivables totaling JPY 42,169,380 to 3 employees of the Company who satisfy the prescribed requirements (the “Eligible Allottees ②”) and to allocate 11,649 common shares of the Company (the “Allocated Shares ②”) through Disposal of Treasury Stock ② in exchange for an in-kind contribution of those monetary receivables totaling JPY 42,169,380 (the amount of monetary receivables contributed per share: JPY 3,620).

In addition, by a resolution adopted at the Board of Directors’ meeting held today, the Company has resolved to allocate 10,478 common shares of the Company (the “Allocated Shares ③”) and, together with the Allocated Shares ① and the Allocated Shares ②, the “Allocated Shares”) through Disposal of Treasury Stock ③ under the Performance-linked Stock Compensation Plan to 2 Directors Eligible for Performance-linked Stock Compensation and 1 officer or employee of the Company (collectively, the “Eligible Allottees ③”) and, together with the Eligible Allottees ① and the Eligible Allottees ②, the “Eligible Allottees”). The allocation will be made in exchange for an in-kind contribution of monetary

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(compensation) receivables against the Company totaling JPY 37,930,360, payable depending on whether the performance indicators for the Evaluation Period from July 1, 2025 to June 30, 2026 have been achieved (the amount of monetary (compensation) receivables contributed per share: JPY 3,620).

In order to encourage medium- to long-term continuous service, the Allocated Shares are subject to transfer restrictions. The restriction period for the Allocated Shares ① and the Allocated Shares ② is a predetermined period specified by the Company's Board of Directors, and the restriction period for the Allocated Shares ③ allocated to Directors is three years (collectively, the "Transfer Restriction Period").

The Eligible Allottees will pay in all of the monetary (compensation) receivables granted to them as property contributed in kind and take up the common shares allocated by the Company through the Disposals of Treasury Stock. In connection with the Disposals of Treasury Stock, the Company will enter into a restricted share allocation agreement with the Eligible Allottees (the "Restricted Share Allocation Agreement"), principally containing the provisions described below.

The Allocated Shares will be allocated only to the Eligible Allottees who wish to take up the shares.

<Overview of the Restricted Share Allocation Agreement>

(1) Transfer Restriction Period

The Eligible Allottees shall not transfer, pledge as collateral, or otherwise dispose of the Allocated Shares during the Transfer Restriction Period.

(2) Conditions for Lifting the Transfer Restrictions

The transfer restrictions on the Allocated Shares held by each Eligible Allottee will be lifted upon expiration of the Transfer Restriction Period, on the condition that the Eligible Allottee has continuously held the position of a Director of the Company (or (a) an officer or employee of the Company if the Eligible Allottee is an officer or employee of the Company, or (b) a director, officer, or employee of the relevant subsidiary if the Eligible Allottee is a director or employee of a subsidiary of the Company) throughout the Transfer Restriction Period.

(3) Uncompensated Acquisition by the Company

Upon expiration of the Transfer Restriction Period, the Company shall automatically acquire without compensation the Allocated Shares for which the transfer restrictions have not been lifted.

(4) Management of Shares

The Allocated Shares shall be managed during the Transfer Restriction Period in a dedicated account for restricted shares established by the Eligible Allottees at Daiwa Securities Co. Ltd., in order to prevent the Allocated Shares from being transferred, pledged as collateral, or otherwise disposed of during the Transfer Restriction Period.

(5) Reorganizations

If, during the Transfer Restriction Period, a merger agreement under which the Company becomes the dissolved company, a share exchange agreement or share transfer plan under which the Company becomes a wholly owned subsidiary, or any other matter relating to reorganization is approved by the Company's General Meeting of Shareholders (or the Company's Board of Directors if approval of the General Meeting of Shareholders is not required for the relevant reorganization), the Company shall, by a resolution of the Board of Directors, lift the transfer restrictions on a reasonably calculated number of the Allocated Shares as of the moment immediately prior to the business day preceding the effective date of the reorganization.

3. Basis and Details of Calculation of the Pay-in Amount

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The Disposals of Treasury Stock will be made in exchange for monetary (compensation) receivables granted to the Eligible Allottees as property contributed in kind. In order to exclude arbitrariness in determining the pay-in amount, the closing price of the Company's common shares on the Tokyo Stock Exchange on September 28, 2026 (the business day prior to the resolution of the Board of Directors), JPY 3,620, has been adopted as the pay-in amount. This is the market price immediately prior to the date of the Board of Directors' resolution. In the absence of any special circumstances indicating that reliance on the latest stock price would be inappropriate, the Company believes that this price reasonably and appropriately reflects the Company's corporate value and is not particularly favorable to the Eligible Allottees.