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## Notice Concerning the Partial Revision of the Basic Policy on Corporate Governance

NITTOC CONSTRUCTION CO., LTD. (hereinafter, “the Company”) hereby announces that it resolved at the Board of Directors’ meeting held on June 24, 2026, to partially revise its Basic Policy on Corporate Governance, as described in the attached document. The additions and revisions are underlined therein.

### 1. Key revisions

- Article 10 Formulation of a Company Motto and Management Philosophy as the Foundation for  
Enhancing Medium- to Long-term Corporate Value
- Article 17 Full Disclosure

## Basic Policy on Corporate Governance

The Company places importance on the interests of all stakeholders who support its corporate activities and recognizes the significance of corporate ethics, which requires compliance not only with applicable laws and regulations but also with internal rules and accepted standards of social conduct. Based on this recognition, the Company has established, as its Basic Policy on Corporate Governance, the development of an organizational structure that enhances management transparency and soundness—supported by initiatives such as ensuring sustainable corporate growth, earning public trust, and eliminating the provision of improper benefits to antisocial forces—and thereby contributes to the development of social infrastructure.

### Section 1 General Principles

#### *Basic Views on Corporate Governance*

Article 1 The Company respects the rights of shareholders and secures their equal treatment. At the same time, the Company recognizes that its continued development depends on the resources provided and contributions made by various stakeholders, including employees, customers, business partners, creditors, and local communities, and strives to build appropriate collaborative relationships with them. Based on these basic views, the Company continuously works to enhance its corporate governance.

### Section 2 Securing the Rights and Equal Treatment of Shareholders

#### *General Shareholders' Meeting*

Article 2 To understand the views of shareholders expressed at the general shareholders' meeting and reflect them in management, the Company analyzes the factors underlying shareholder support for or opposition to proposals at such meetings. In cases where a substantial number of votes are cast against a proposal, the Company analyzes the reasons for such opposition and uses the findings to inform subsequent dialogue with shareholders.

2. From the perspective of ensuring flexibility and expertise in management decision-making, in cases where the Company proposes to delegate to the Board of Directors certain matters that would otherwise require resolution at the general shareholders' meeting, it shall do so after considering whether the Board has established an appropriate framework to effectively fulfill its roles and responsibilities with respect to corporate governance.
3. The Company recognizes that the general shareholders' meeting is an opportunity for dialogue with shareholders and, from shareholders' perspective, prepares a clear and understandable notice of convocation. At the same time, it strives to provide information regarding corporate management, and is committed to developing an environment that enables shareholders to exercise their rights appropriately.
4. The Company endeavors to send out the notice of convocation of the general shareholders' meetings early enough to allow shareholders adequate time to fully consider the proposals. In addition, the Company discloses such notices on its website and that of the Tokyo Stock Exchange prior to sending them to shareholders.
5. The Company strives to schedule its general shareholders' meeting and related procedures appropriately as a whole, by taking measures such as ensuring sufficient time for shareholders to consider proposals and for the accounting auditor to conduct its audit, while also enabling a greater number of shareholders to attend by avoiding, where possible, the peak period during which many companies hold their general shareholders' meeting.

6. The Company, taking into account the diversity of its shareholders, enables the electronic exercise of voting rights and makes an English translation of the notice of convocation available on its website.
7. To accommodate requests from institutional investors holding shares in the name of a trust bank or other institution who wish to exercise their voting rights directly at the general shareholders' meeting in place of such institutions, the Company will consider how to respond in consultation with the trust bank or other relevant parties.

#### *Securing Equal Treatment of Shareholders*

Article 3 The Company recognizes the importance of shareholders' rights and takes appropriate measures to ensure that no shareholder is effectively prevented from exercising such rights.

#### *Exercise of Shareholder Rights at the General Shareholders' Meeting*

Article 4 The Company has prescribed in its Share Handling Regulations specific procedures for the exercise of minority shareholder rights recognized under the Companies Act and strives to ensure the appropriate exercise of such rights.

#### *Basic Policy on Capital Management*

Article 5 The Company's basic policy is to maximize shareholder value while strengthening its corporate structure and reinforcing its management foundation through internal reserves. With respect to returns to shareholders, the Company seeks to provide stable returns and determines the level of such returns based on its performance and the future business environment.

#### *Basic Policy on Cross-Shareholdings and the Exercise of Related Voting Rights*

Article 6 In light of the criteria set forth below, it is the Company's policy to hold shares as cross-shareholdings from a medium- to long-term perspective in cases where it determines that such cross-shareholdings will contribute to the enhancement of its corporate value by supporting its business expansion and sustainable growth.

- (1) Business partners and other parties with whom the Company has stable and ongoing relationships or with whom there is potential to expand such relationships
- (2) Business partners and other parties whose relationship with the Company contributes to the maintenance of a stable financial position
- (3) Business partners and other parties that can contribute to the Company's business expansion through business alliances and other arrangements
- (4) The total acquisition cost of individual cross-shareholdings shall not exceed 3% of total assets.

The Board of Directors reviews the economic rationale and necessity of each cross-shareholding, taking into account factors such as risks and returns, and determines whether such a holding should be maintained, expanded, reduced, or discontinued.

2. The Company exercises voting rights associated with cross-shareholdings after carefully reviewing the details of each proposal and comprehensively assessing the Company's relationship with the relevant business partner or other party, as well as whether the proposal contributes to the Company's sustainable growth, the medium- to long-term enhancement of its corporate value, or the enhancement of shareholder value.

#### *Anti-takeover Measures*

Article 7 The Company has not adopted any anti-takeover measures and currently has no plans to do so. Should the Company introduce such measures in the future, the Board of Directors and Corporate Auditors will carefully examine their necessity and reasonableness from the perspective of fulfilling their fiduciary responsibilities to shareholders, ensure appropriate procedures are followed in their adoption and operation, and provide shareholders with a

sufficient explanation so that such measures are not perceived as serving the personal interests of management or the Board itself.

2. In the event that its shares are subject to a tender offer, the Company will promptly disclose the views of the Board of Directors to shareholders. In addition, the Company will respect shareholders' rights and will not unduly impede their ability to respond to such tender offer.

*Capital Policy that May Adversely Affect Shareholder Interests*

Article 8 With respect to capital policies that may result in a change in control or substantial dilution, the Board of Directors and Corporate Auditors will thoroughly examine the necessity, reasonableness, and other relevant factors of such policies during the course of their deliberations and strive to provide shareholders with a sufficient explanation.

*Basic Policy on Related Party Transactions*

Article 9 If the NITTOC Group (hereinafter, "the Group") engages in transactions with its officers, major shareholders, or other related parties, the Company will, in principle, submit such transactions in advance to the Board of Directors for approval in accordance with the standards set forth in the Regulations of the Board of Directors, unless it is clearly confirmed that the transaction terms are equivalent to those of ordinary transactions, so as to ensure that such transactions do not adversely affect the interests of the Group or its shareholders. In addition, in order to protect minority shareholders with respect to material transactions and conduct that may give rise to conflicts of interest between controlling shareholders and minority shareholders, the Company has established a Special Committee, composed solely of four independent Outside Directors and two independent Outside Corporate Auditors, as an advisory body to the Board of Directors. The Committee deliberates and examines such matters and provides recommendations to the Board of Directors.

Section 3 Appropriate Cooperation with Stakeholders Other Than Shareholders

*Formulation of a Company Motto and Management Philosophy as the Foundation for Enhancing Medium- to Long-term Corporate Value*

Article 10 The Company has established its company motto and management philosophy as set forth below.

Company Motto

Continuing to play a vital, behind-the-scenes role in society through dependable construction technologies

Management Philosophy

- Mission  
A company that contributes to building a safe and secure national land
- Value  
Comprehensive technical capabilities and efficient management of foundation construction
- Vision  
To remain an expert in foundation construction with a focus on environmental and disaster prevention construction, fostered by reliable technical capabilities

Article 11 The Company recognizes that its sustainable growth and the medium- to long-term enhancement of corporate value depend on the resources provided and contributions made by various stakeholders, including employees, customers, business partners, creditors, and local communities, and strives to build appropriate collaborative relationships with them.

*Formulation and Implementation of a Corporate Code of Conduct*

Article 12 The Company has established a Code of Conduct as its basic compliance policy, and all officers and employees are required to comply with it. In addition, the Board of Directors

verifies, through the Compliance Committee, on an annual basis whether the Code of Conduct is being observed.

*Sustainability Issues, Including Social and Environmental Matters, and the Basic Sustainability Policy*

Article 13 The Company gives due consideration to global environmental issues, including climate change, respect for human rights, and the health and working environment of its employees, and ensures fair and appropriate treatment of and transactions with various stakeholders, including customers, business partners, creditors, and local communities. In addition, at its business offices and other facilities, the Company establishes crisis management systems to reduce the risk of natural disasters and other contingencies. Simultaneously, the Company proactively engages in disaster recovery and reconstruction efforts, and develops and implements sustainable, environmentally friendly technologies that support a decarbonized society. Furthermore, while respecting human rights, the Company will foster an environment where diverse talent respects one another and can fully demonstrate their capabilities. Based on this approach, the Group aims to enhance its corporate value over the medium to long term while contributing to the realization of a sustainable society through its business activities.

*Ensuring Diversity, Including Active Participation of Women*

Article 14 The Company's basic policy is to pursue growth and development by recognizing the diversity of each of its officers and employees, valuing their individuality, and fostering an environment where each individual can fully demonstrate their capabilities. The Company does not impose restrictions with respect to gender, nationality, timing of hire, or other factors in recruitment and promotion and makes decisions based on a comprehensive assessment of an individual's ability, aptitude, and other considerations.

*Whistleblowing*

Article 15 The Company establishes both internal and external reporting channels through which all officers and employees may report violations of laws and regulations, harassment, and other misconduct. Cases of whistleblowing are reported to Corporate Auditors and, through the Compliance Committee, to the Board of Directors. In addition, the Company stipulates in its Corporate Ethics Helpline Rules that the identity of whistleblowers using the internal reporting system available to employees of the Company and its subsidiaries shall be kept confidential, and that such whistleblowers shall not be subject to any disadvantageous treatment on the basis of making a report. The secretariat ensures the proper implementation of this system.

*Roles of Corporate Pension Funds as Asset Owners*

Article 16 The Company participates in the Zenkoku Sogo Corporate Pension Fund. With respect to the management of pension assets, the Company appoints representatives to the Fund and works in coordination with asset management consultants. Matters including the selection and evaluation of asset managers and the outsourcing of asset management operations are deliberated and determined by the Asset Management Review Committee, which operates with a high degree of neutrality and fairness.

Section 4 Ensuring Appropriate Information Disclosure and Transparency

*Full Disclosure*

Article 17 The Company determines its policies on risk management, internal control systems, compliance, and other matters relating to the Company and the Group, in accordance with the Companies Act and other applicable laws and regulations, and discloses such policies in a timely and appropriate manner. In addition, the Company promptly discloses information based on the principles of transparency, timeliness, and fairness in accordance with the Companies Act, Financial Instruments and Exchange Act, other applicable laws and regulations, and regulations of the Tokyo Stock Exchange. Even if disclosure is not required under applicable laws and regulations or the timely disclosure rules, the Company

proactively and fairly discloses information that it determines to be material and useful for shareholders and investors in understanding the Company.

2. The Company does not disclose personal information, customer information, or information that may infringe upon the rights of relevant parties.
3. The Company, at present, prepares and discloses English-language materials, including integrated reports, summary financial results, and convocation notices, in addition to maintaining an English-language website.
4. With regard to sustainability, the Company currently collects necessary materials and data on climate change-related risks and revenue opportunities, as well as their impact on its business activities and earnings. The Company then analyzes such information and formulates its Basic Sustainability Policy with a view to enhancing its medium- to long-term corporate value.

#### *External Auditors*

Article 18 The Company and the external auditor recognize that the external auditor has a responsibility to shareholders and investors, and take appropriate measures to ensure the proper conduct of audits.

2. The Board of Corporate Auditors formulates its evaluation criteria with reference to the *Practical Guidelines for Audit & Supervisory Board Members Concerning the Evaluation of Accounting Auditors and Formulation of Selection Criteria* published by the Japan Audit & Supervisory Board Members Association.
3. The Company develops audit schedules following consultation with the external auditor to ensure sufficient time for auditing.
4. The external auditor meets and works closely with the Director and General Manager of the Administration Division on an ongoing basis. In addition, at the request of the external auditor, the Company provides opportunities for meetings with senior management, including the Representative Director and other Directors.
5. The Company ensures close coordination among the external auditor, Corporate Auditors, and Outside Directors through accounting audits, reporting based on quarterly reviews, and other means.
6. If the external auditor identifies misconduct and requests that appropriate action be taken, the Company establishes an internal investigation committee under the leadership of the Compliance Committee to conduct investigations and implement corrective measures, and to consider ways to prevent recurrence. The results are then reported to the Board of Directors through the Compliance Committee.

## Section 5 Responsibilities of the Board of Directors and Other Management Bodies

#### *Roles and Responsibilities of the Board of Directors*

Article 19 The Board of Directors is responsible for supervising management as a whole, including the execution of business by those responsible for business execution, thereby ensuring the fairness and transparency of corporate management. In addition, the Board makes decisions on behalf of the Company through resolutions on matters prescribed by laws and regulations and on material matters relating to business execution stipulated in the Regulations of the Board of Directors. The Board of Directors delegates authority over business execution and associated decision-making on matters other than material matters relating to business execution to subordinate bodies, such as the Management Committee, as well as to officers responsible for overseeing the relevant operations, namely division heads. The Board also oversees the status of execution of duties by these bodies and officers. From the perspective of stakeholders, Outside Directors oversee the execution of duties by the Board of Directors and those responsible for business execution, as well as oversee conflicts of interest between the Company and its management or other related parties, with the aim of promoting the sustainable growth of the Group and enhancing its medium- to long-term corporate value.

2. The Company regards its medium-term management plan as a commitment to shareholders and other stakeholders, and explains its progress, challenges, and initiatives in each fiscal year and upon the formulation of a new medium-term management plan, while also disclosing such information to the general public through its website and other channels.

3. After deliberation by the Nomination and Compensation Committee, the Board of Directors determines, from among candidates deemed qualified in light of their character, insights, and track record, the individual who is capable of fulfilling the responsibilities of Chief Executive Officer as successor to the President and Representative Director. The Company has established the Standards for Successor Selection and Successor Development Planning and has formulated its successor development plan. The execution and progress of this plan will be reported to the Board of Directors through the Nomination and Compensation Committee.
4. The Company has established an environment that supports prompt and appropriate risk-taking by clearly defining matters to be resolved by the Board of Directors, as well as the authority of the President and Representative Director, individual Directors, and each division, in the Regulations of the Board of Directors, the Regulations on Organizations and the Division of Duties, the Work Regulations, and the Authority Matrix. In addition, in order to provide Directors with appropriate, fair, and well-balanced remuneration that boosts their motivation to contribute to the Company's sustainable growth and the enhancement of social and corporate value, the remuneration of Directors is determined by the Board of Directors based on certain criteria, reflecting in part performance-linked elements, after deliberation by a voluntary nomination and compensation committee that includes independent Outside Directors, independent Outside Corporate Auditors (hereinafter, the "Nomination and Compensation Committee").
5. The Board of Directors, acting on behalf of shareholders, achieves efficient and effective corporate governance for the benefit of all shareholders, with a view to advancing their interests through the medium- to long-term enhancement of corporate value. Through such governance, the Board assumes responsibility for ensuring the Company's sustainable growth and enhancing its social and corporate value. To fulfill this responsibility, the Board of Directors exercises its supervisory function over management as a whole to ensure fairness and transparency in management, and makes decisions in the best interest of the Company through the evaluation of any significant risks it is facing, the formulation of appropriate responses to such risks, and the determination of material matters relating to business execution. In addition, the Board considers that providing effective oversight of Executive Officers to be one of its key roles and responsibilities, appropriately evaluates the Company's performance and other relevant factors, and ensures that such evaluations are properly reflected in personnel decisions concerning Executive Officers.
6. The Board of Directors is responsible for management decision-making and oversight, and deliberates and determines matters such as the Company's strategic direction, as well as the analysis of material matters and risks and the policies for addressing them. To maintain an executive team with the knowledge, experience, and capabilities necessary to carry out these duties, the Company determines proposals relating to the appointment of officers after deliberation by the Nomination and Compensation Committee, taking into account the Company's properly evaluated performance and other relevant factors.
7. In the event of the dismissal of a Director, including the Chief Executive Officer, the Board of Directors shall, in accordance with the Rules on Disciplinary Actions for Directors and Executive Officers with Titles, comprehensively assess factors such as whether the individual is qualified, their management capabilities, and their involvement in any serious misconduct. Where the Board determines that the individual is no longer able to appropriately fulfill his or her duties, their dismissal shall be deliberated by the Nomination and Compensation Committee and subsequently resolved by the Board of Directors.
8. In addition, the Board of Directors supervises the timely and accurate disclosure of information. The Compliance Committee and the Risk Management Committee, both established under the Board of Directors, are responsible for developing compliance and risk management systems, while the Corporate Strategy Division oversees internal controls relating to financial reporting, including ensuring that they are properly maintained. Furthermore, the development and effectiveness of these systems are reported to the Board of Directors, which provides supervision.

- Article 20 Among the three Corporate Auditors who comprise the Company's Board of Corporate Auditors, two are independent Outside Corporate Auditors (one full-time and one part-time), thereby ensuring independence. In addition, each Outside Corporate Auditor expresses their opinions appropriately at Board of Directors' meetings from an independent and objective standpoint, drawing on their extensive experience and high level of expertise, particularly from a financial and accounting perspective.
2. Independent Outside Corporate Auditors provide opportunities for regular information exchange with independent Outside Directors, thereby ensuring effective coordination between the two groups.

*Fiduciary Responsibilities of Directors and Corporate Auditors*

- Article 21 The Company's Directors, Corporate Auditors, and management recognize their fiduciary responsibilities to shareholders and act appropriately in the interest of the Company and shareholders as a whole.

*Business Execution and Oversight of Management*

- Article 22 The Company has appointed four independent Outside Directors and ensures a highly effective supervisory structure by incorporating their opinions, provided from independent and objective standpoints and viewpoints, into its management.

*Roles and Responsibilities of Independent Outside Directors*

- Article 23 Independent Outside Directors provide advice on management policies and improvements, supervise business execution by management, oversee conflicts of interest between the Company and related parties, and share opinions and other insights from a standpoint independent of management, based on their professional knowledge and experience.

*Effective Use of Independent Outside Directors*

- Article 24 The Company currently appoints four independent Outside Directors, representing more than one-third of the Board of Directors, and by doing so, obtains objective and neutral advice and opinions on overall management from broad perspectives, as well as benefits from their oversight of business execution and conflicts of interest. In order to protect minority shareholders with respect to material transactions and conduct that may give rise to conflicts of interest between controlling shareholders and minority shareholders, the Company has established a Special Committee, composed solely of four independent Outside Directors and two independent Outside Corporate Auditors, as an advisory body to the Board of Directors. The Committee deliberates and examines such matters and provides recommendations to the Board of Directors.

*Independence Standards and Qualifications for Independent Outside Directors*

- Article 25 The Company selects candidates for independent Outside Director positions following deliberation and review by the Board of Directors, based on both the independence standards prescribed by the Tokyo Stock Exchange and the Company's internal independence criteria.

*Use of an Optional Approach*

- Article 26 The Company is a company with a board of corporate auditors, and the number of independent Outside Directors does not constitute a majority of the Board of Directors. Nevertheless, the Company has established the Nomination and Compensation Committee under the Board of Directors in order to enhance independence, transparency, objectivity and accountability in procedures concerning the nomination and compensation of Directors and senior management. The Nomination and Compensation Committee is composed of six members: one independent Outside Director serving as Chairperson, the President and Representative Director, three independent Outside Directors other than the Chairperson, and one Corporate Auditor. The Committee deliberates on the development and revision of the executive remuneration and evaluation systems, as well as on evaluation results, fixed remuneration, and performance-linked remuneration.

*Preconditions for Ensuring the Effectiveness of the Board of Directors and the Board of Corporate Auditors*

- Article 27 The Board of Directors, as the Company's decision-making body for management oversight, is responsible for determining or approving basic management policies and material matters relating to business execution, as well as overseeing the execution of duties by Directors based on associated reporting. In order to maintain a Board with the knowledge, experience, and capabilities necessary to fulfill these duties, the Company nominates candidates for Director positions after deliberation by the Nomination and Compensation Committee. Through this process, the Company ensures that, in selecting Director candidates, the Board of Directors is appropriately balanced in terms of knowledge, experience, and capabilities, while maintaining both diversity and an appropriate size. In addition, one Outside Corporate Auditor is a certified public accountant with extensive expertise in corporate accounting and possesses considerable knowledge of finance and accounting.
2. The Company prepares a skills matrix to take into account the balance of knowledge, experience, and capabilities, as well as diversity and the appropriate size of the Board of Directors as a whole, and discloses it in the notice of convocation of the general shareholders' meeting.
  3. The Company discloses the positions concurrently held by its Directors and Corporate Auditors at other companies, including listed companies, in its business report, reference documents for the general shareholders' meeting, and annual securities report.
  4. The Board of Directors conducts an annual survey, including self-evaluation by each Director, regarding such things as the composition, agenda, and operation of the Board of Directors, and analyzes and evaluates the effectiveness of the Board as a whole, identifies any issues, and implements improvements if necessary. The results of this evaluation are disclosed in the corporate governance report.

#### *Active Board of Directors Deliberation*

- Article 28 The Company strives to brief Outside Directors in advance regarding important agenda items in order to facilitate constructive discussion and the exchange of views at Board of Directors' meetings. The Company also ensures an environment where Outside Directors are able to express their opinions and, where appropriate, raise issues at such meetings based on their professional knowledge and experience.
2. The Company conducts its key meetings, including those of the Board of Directors and Management Committee, as follows.
    - (1) With respect to key meetings such as those of the Board of Directors and the Management Committee, the Company provides advance notice of matters to be deliberated at least three days prior to the meeting date.
    - (2) With respect to material matters requiring resolution by the Board of Directors, the Company briefs all Directors at the Management Committee's meeting held ahead of the relevant Board meeting.
    - (3) The Company notifies Directors of the annual schedule for key meetings in March each year.
    - (4) The Company maintains an appropriate number of agenda items and frequency for key meetings, including those of the Board of Directors and the Management Committee.
    - (5) The Company strives to secure sufficient deliberation time for key meetings, including those of the Board of Directors and the Management Committee.

#### *Information Gathering and Support Structure*

- Article 29 Directors and Corporate Auditors may request relevant departments to provide any information necessary to effectively fulfill their roles and responsibilities, and each division submits the requested information as appropriate. The Administration Division, which serves as the secretariat for the Board of Directors, together with the Corporate Strategy Division, and the Audit Department, provide support to Directors and Corporate Auditors. In addition, the Board of Directors and the Board of Corporate Auditors confirm that the necessary information is being provided in a timely and appropriate manner.
2. The Board of Directors and the Board of Corporate Auditors may seek advice from external experts when they consider it necessary to obtain information to facilitate transparent, fair, prompt, and well-informed decision-making. The Company shall bear the costs incurred by Directors and Corporate Auditors in obtaining such information.

3. The Internal Audit Division exchanges information and coordinates with Directors and Corporate Auditors as appropriate. The results of internal audits conducted by the Internal Audit Division are reported to the Board of Directors as appropriate. In addition, the Administration Division is responsible for communication and coordination between the Company and Outside Directors and Outside Corporate Auditors, and has established a system capable of responding to requests from Outside Directors and Outside Corporate Auditors for the collection and provision of information.

#### *Director and Corporate Auditor Training*

- Article 30 Directors and Corporate Auditors shall, in order to fulfill their duties, constantly and proactively seek information and develop their knowledge and expertise concerning the Company's financial position, compliance, corporate governance, and other matters. Meanwhile, the Company shall provide the necessary opportunities for such training.
2. The Company selects Directors and Corporate Auditors who are capable of effectively fulfilling the required roles and responsibilities, including legal responsibilities. In particular, when appointing Directors and Corporate Auditors from within the Company, the Company selects individuals with extensive knowledge of its business operations, finance, organizational structure, and other relevant matters.
  3. The Company ensures that, following their appointment and as appropriate thereafter, Directors and Corporate Auditors receive timely briefings from relevant departments or officers on the Group's corporate strategies, business plans, the status of each business, the management environment and challenges, and other relevant matters, so as they develop a sufficient understanding to fulfill their roles and functions.

### Section 6 Dialogue with Shareholders

#### *Policy for Constructive Dialogue with Shareholders*

- Article 31 In order to facilitate constructive dialogue with shareholders, the Company strives to provide necessary and appropriate timely disclosures through statutory disclosures required under the Companies Act, the Financial Instruments and Exchange Act, and other applicable laws and regulations, timely disclosures pursuant to stock exchange regulations, and voluntary disclosures, including investor relations (IR) activities. Investor briefings and other IR activities are overseen by the Corporate Strategy Division. To facilitate constructive dialogue with shareholders, the Company holds financial results briefings and discloses information through its website and other channels, thereby deepening shareholders' understanding of the Company's corporate strategies and business environment.
2. The Corporate Strategy Division, which is responsible for investor relations, engages in dialogue with shareholders under the oversight of management and based on a thorough understanding of the Company's shareholder composition. In doing so, it coordinates with management and relevant supporting departments, including the Accounting Department, Legal Department, and Business Operation Division, and reports the results of such dialogue to the Board of Directors as appropriate.
  3. The Company presents its direction for sustainable growth through financial results briefings and other occasions, and strives to engage in constructive dialogue with shareholders, while also endeavoring to establish frameworks for facilitating such dialogue and gain a thorough understanding of shareholder composition.
  4. The Company manages insider information in accordance with its internal regulations on internal information. In addition, the Company designates the period prior to the announcement of financial results as a silent period and restricts dialogue with investors during this time.

#### *Establishing and Disclosing Business Strategies and Plans*

- Article 32 The Company strives to achieve sustainable growth and enhance medium- to long-term shareholder value. In formulating business strategies and plans, the Company presents its basic policies on earnings plans and capital management in its medium-term management plan.

Section 7 Other

*Revision and Abolition*

Article 33 The revision and abolition of this Basic Policy on Corporate Governance shall be subject to resolution by the Board of Directors.