Note:	This document has been translated from the Japanese original for reference purposes only. In the event of any discrepancy between this translated document and the Japanese original, the original shall prevail.

June 22, 2026

Company name:	FLECT Co., Ltd.
Listing:	Tokyo Stock Exchange
Securities code:	4414
Representative:	Koji Kurokawa, Representative Director and CEO
Inquiries:	Hiroshi Kawata, Executive Officer, Head of Finance & Accounting Division, CFO
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Matters Concerning the Controlling Shareholder, etc.

Matters related to the Company's controlling shareholder, etc. are as follows.

1. Trade name, etc. of the parent company, controlling shareholder (excluding the parent company), other affiliated company, or parent company of the other affiliated company

(As of March 31, 2026)

Name	Attribute	Voting rights ratio (%)			Financial instruments exchange(s) on which the issued securities are listed
		Directly held	Subject to aggregation	Total	
KURO LLC.	Controlling shareholder (excluding parent company)	53.41	0.13	53.54	—

(Note 1) KURO LLC. is an asset management company in which Koji Kurokawa, the Company's Representative Director and CEO, holds 100% of the voting rights for his own account.
(Note 2) Voting rights ratios have been rounded off at the third decimal place.

2. Matters Concerning Transactions with the Controlling Shareholder, etc.

Transaction details: Acquisition of treasury shares
Transaction amount: ¥1,199,851 thousand

The acquisition of treasury shares was conducted based on the resolution of the Board of Directors held on February 5, 2026, via the off-auction treasury share repurchase trading system (ToSTNeT-3) of the Tokyo Stock Exchange. The transaction price was based on the closing price on February 12, 2026.

3. Status of implementation of measures to protect minority shareholders in transactions, etc., with the controlling shareholder

The Company's basic policy regarding transactions with its controlling shareholder is not to conduct such transactions unless it is ensured that there is a rational basis (business necessity) for entering into the transaction and that the transaction terms are appropriate (i.e., they are on terms equivalent to those offered to other counterparties and the appropriateness of such terms can be confirmed on a case-by-case basis), and unless the transaction is not in a situation that could harm the Company's interests.

When implementing a transaction with the controlling shareholder, the Company recognizes that a high level of caution is required from the perspective of maintaining sound management, and will carefully determine whether the above is ensured and, after sufficient deliberation by the Board of Directors, obtain appropriate approval.