

Last Update: March 31, 2026

Trend Micro Incorporated

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https://www.trendmicro.com/ja_jp/business.html

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.

The corporate governance of [Trend Micro Incorporated] (the “Company”) is described below.

I. Basic Views on Corporate Governance, Capital Structure, Corporate Attributes, and Other Key Information

1. Basic Views

Our vision is “A world safe for exchanging digital information.” To realize this vision, we have established our core values, collectively referred to as “3CiT,” derived from the initials of Customer, Change, Collaboration, Innovation, and Trustworthiness. We actively promote these values throughout the organization.

In the area of corporate governance, we operate under our “3CiT” core values to fulfill our corporate responsibilities to shareholders, customers, business partners, employees, and other stakeholders, with the aim of enhancing our long-term corporate value.

Customer: Supporting our customers’ success is our highest priority. We act with integrity and resolve issues as quickly as possible.

Change: We view change as an opportunity. We remain agile, constantly test new ideas, and pivot swiftly to deliver better outcomes. This enables us to respond promptly to changes in the business environment surrounding our Group.

Collaboration: We show respect and empathy to all, breaking down silos through collaboration to achieve success. We place great importance on working with both internal and external stakeholders to create value together.

Innovation: We anticipate the future. Without fear of failure, we push the limits of what can be done to create new value. Ensuring management transparency and soundness, as well as maintaining the reliability of disclosure, are key elements that support innovation.

Trustworthiness: We uphold high ethical standards and transparency, striving to remain a company trusted by all stakeholders. We recognize compliance as a critical issue in securing social trust and are committed to addressing it.

In pursuing the objectives of corporate governance, we believe it is essential to adopt the governance structure most suited to our corporate culture, industry, business model, scale, and the quality and quantity of talent available to us. Accordingly, we have chosen to operate as a Company with an Audit & Supervisory Board.

As of the submission date of this Corporate Governance Report, our Board of Directors consists of six members, a relatively small number, including two outside directors. This composition strengthens our supervisory function to ensure proper Board operations.

For business execution, company policies determined by the Board of Directors are appropriately reflected in actual operations across each customer segment, our business regions spanning dozens of countries worldwide, and each functional area. Executive officers appointed from within our Group bear responsibility for carrying out these operations. For important matters relating to

our Group’s management policies and strategies, the outcomes of regular budget review processes and discussions among executive members are taken into account in the Board’s decision-making.

Reasons for Non-compliance with the Principles of the Corporate Governance Code

(Supplementary Principle 3-1③ Response to TCFD, etc.)

As our company specializes in cybersecurity, we estimate that risks and revenue opportunities related to climate change have minimal impact on our business activities and earnings. Therefore, we are not currently conducting disclosures based on the TCFD framework or equivalent frameworks. However, to ensure that we can respond promptly if disclosure methods such as TCFD become legally mandated in the future, we measure and disclose our greenhouse gas emissions.

https://www.trendmicro.com/ja_ip/about/corporate-social-responsibility/sustainability-policy/environment.html

In addition, we publish our Sustainability Report on the website below:

https://www.trendmicro.com/ja_ip/about/corporate-social-responsibility.html

Disclosure Based on each Principle of the Corporate Governance Code

(Principle 1-4 Cross-shareholdings)

As a general rule, we do not implement cross-shareholdings unless it is deemed necessary to maintain and strengthen business relationships, and we do not hold shares of other listed companies as of the end of the most recent fiscal year.

(Principle 1-7 Related Party Transactions)

We have established our Code of Conduct as the foundation of the Group’s compliance framework. This Code prohibits us from engaging in any actions that conflict with, or could reasonably be perceived as conflicting with, the interests of our Group. Each year, we require all officers and employees to review the Code and affirm their commitment to it. Furthermore, any transactions between our Company and its directors are subject to approval by the Board of Directors in accordance with applicable laws and the Board’s regulations. Code of Conduct: www.trendmicro.com/en_us/about/trust-center/company.html?modal=2ba419

(Supplementary Principle 2-4① Ensuring Diversity in the Promotion to Core Human Resources)

Please refer to the section entitled “Other” <Our Talent Philosophy and Global Talent Strategy> in “3. Status of Initiatives Related to Respect for the Positions of Stakeholders” in III “Status of Implementation of Measures for Shareholders and Other Stakeholders” of this report for more information on our approach, status, etc. to securing diversity in the promotion of core human resources and other related measures.

(Principle 2-6 Asset Owners)

We have introduced a defined contribution pension plan, and as an asset owner, we are not involved in the management of corporate pension funds. However, in view of the fact that management affects the asset formation of employees, we regularly educate employees on asset management.

(Principle 3-1 Enhancement of Information Disclosure)

(i) Corporate goals (Vision)

Since its founding in 1989, our Group has consistently been engaged in the field of cybersecurity with the aim of realizing “a world safe for exchanging digital information.” Trend Micro’s AI-powered enterprise cybersecurity platform, Trend Vision One, continues to evolve, helping corporate customers better identify, communicate, and mitigate cyber risks. For individual customers, in addition to providing antivirus and other security solutions, we also offer TrendMicro Scam Buster, a product specializing in fraud prevention, thereby protecting customers’ digital lives and delivering safety and trust.

(ii) Basic approach to corporate governance and policies

We regard corporate governance as important for the ongoing improvement of corporate value and for fulfilling our corporate responsibilities to stakeholders, including shareholders, consumers, business partners and employees. We consider it an important management issue to respond swiftly to changes in the business environment surrounding the Group, to strengthen management oversight functions centered on Outside Directors and Outside Auditors, to ensure the transparency and soundness of management, and to maintain the credibility of disclosure. We also recognize that compliance is an important issue in ensuring social trust, and are working to achieve this goal.

(iii) Policies and procedures for the Board of Directors to determine remuneration for Directors and Auditors

We believe that, in order to secure the human resources necessary to maximize our corporate value, we should adopt a remuneration system suited to the type and size of our business in which officer remuneration, etc. function as an appropriate incentive. The remuneration of Directors consists of base(fixed) remuneration, other cash incentives, including our stock price-linked plan, and stock options, within the scope of the amount and content of remuneration, etc. approved by the General Meeting of Shareholders, taking into account the performance and the remuneration trends in the overseas and Japanese markets, and considering salaries of employees. The amount of remuneration and the proportion of remuneration by individual Internal Directors are consulted with the Nomination and Remuneration Advisory Committee, which is composed mainly of Outside Directors, and the content deliberated by the Committee is determined by the Board of Directors. For Outside Directors and Auditors, base (fixed) remuneration is the only remuneration, and the determination of remuneration for Auditors is left to the consultation of Auditors. Details of the remuneration of Directors are provided in the “Disclosure of Policy on Determination of Amount of Remuneration or Method of Calculation”.

(iv) Policies and procedures of the Board of Directors for nominating candidates for Directors and Auditors

Nomination Policy for Directors and Auditors

Our policy in nominating candidates for Directors and Auditors is to select individuals who can perform the duties of these roles without health issues or significant time constraints, and who possess the appropriate character, ethics, and decision-making ability required of our Directors and Auditors.

Within the Company, executives appointed to ensure that policies determined by the Board of Directors are properly reflected in actual operations across each customer segment, our business regions spanning dozens of countries worldwide, and each functional area of the Company, bear responsibility for executing their respective duties. In principle, these executives are expected to be given priority in nomination as Director candidates. As of March 31, 2026, there are 13 executives in our Group, including 4 women.

Succession planning is conducted with an emphasis on continuity, utilizing a talent pool approach across the Group. This includes the executive team, which serves as the core group for Director candidates, as well as various younger teams regarded as potential future executives.

In nominating Outside Directors and Outside Auditors, we base our selection on the requirements for “Independent Officers” stipulated by the Tokyo Stock Exchange, after thoroughly investigating and assessing relationships and potential conflicts of interest with the Company. For Outside Directors, we appoint individuals with professional expertise or management experience who can provide diverse advice to support our globally unique management. For Outside Auditors, we appoint individuals with considerable knowledge of finance and accounting, gained through practical experience or professional qualifications, to ensure impartial and fair auditing.

Nomination Procedures

From among persons possessing the aforementioned qualifications for Directors and Auditors, candidates for new officers are listed in consultation with the Representative Director, taking into account diversity in the composition of the Board — including

skill sets, gender balance, and international experience. For Directors, nominations are referred to and deliberated by the Nomination and Remuneration Advisory Committee before being determined by the Board of Directors for inclusion as proposals to the General Meeting of Shareholders. For Auditors, nominations require the consent of the Board of Auditors and are deliberated by the Board of Directors before being submitted to the General Meeting of Shareholders for approval.

Policy on Removal of Directors and Auditors

If a Director or Auditor becomes unable to perform their duties due to health reasons, engages in conduct contrary to public order and morals, neglects duties and damages corporate value, or otherwise fails to meet the criteria established at the time of nomination, removal will be considered. For Directors, such cases are referred to and deliberated by the Nomination and Remuneration Advisory Committee; for Auditors, removal is considered based on the views of the Auditors. In both cases, the Board of Directors discusses the matter thoroughly and makes a decision on whether to submit a removal proposal to the General Meeting of Shareholders.

The Nomination and Remuneration Advisory Committee has also determined that the term of office for Outside Officers should, in principle, be targeted at 12 years from initial appointment.

(v) Explanation when the Board of Directors nominates officer candidates based on the above (iv)

The reasons for the appointment of individual officers are described in the explanatory text of the proposal for the appointment of officers.

(Supplementary Principle 3-1③ Initiatives for Sustainability and Investment, etc. in Human Capital and Intellectual Property)

<<Sustainability policy, etc.>>

Under our Sustainability Policy- "As a global leader in cybersecurity, Trend Micro aims to make the world a better and safer place through both digital and physical dimensions. Sustainability is part of our corporate vision and core values, and we strive to integrate it into our daily operations by fostering a mindset among employees to continually work toward building a better future" - our Group implements a variety of sustainability initiatives around three key messages:

1. Contributing to society through our business
2. Supporting local communities through social activities
3. Valuing people and culture

We provide details of our sustainability policy and key messages, along with specific targets for environmental conservation, sustainable procurement, ethics, and labor and human rights based on these policies, on our website, Trend Micro Sustainability Policy www.trendmicro.com/en_us/about/corporate-social-responsibility.html?modal=s3a-btn-learn-more-1d102c.

<<Investment, etc. in human capital and intellectual property>>

As a company specializing in cybersecurity, investing in human capital and intellectual property is important for the Group. In principle, the Group invests in human capital to enable internal development of intellectual property related to the provision of technologies that can appropriately respond to customers' pain points. To the extent that intellectual property related to the provision of necessary technology cannot be developed quickly internally, we may enter into an agreement to transfer or license such intellectual property or invest in intellectual property through an M&A of the company that owns such intellectual property. Please refer to the section entitled "Other" <<Our Human Capital Philosophy and Global Talent Strategy> in "3. Status of Initiatives Related to Respect for the Positions of Stakeholders" in III "Status of Implementation of Measures for Shareholders and Other Stakeholders" of this report for more information on human resources management. For various statistical data on human capital, please refer to "(iv) Various Statistical Data on Human Capital" at the end of this report.

(Supplementary Principle 4-1① Matters for Resolution and Scope of Delegation of the Board of Directors)

In addition to matters that require decision-making by the Board of Directors in accordance with laws and regulations and the Articles of Incorporation, and matters that are delegated by resolution of the General Meeting of Shareholders, important matters that affect our business operations, such as the formulation of business plans that we consider necessary to be discussed and decided by the Board of Directors and the election and dismissal of executive officers and employees (Executives) who are primarily responsible for the business operations of the Group, are stipulated in the Regulations of the Board of Directors as matters determined by resolution of and decided by the Board of Directors.

Executives of the Group are responsible and authorized to execute their respective duties while ensuring that the strategies and policies of the Group are appropriately reflected in the actual operations in each customer segment, in each business region and in each business function across countries worldwide.

(Supplementary Principle 4-1② Medium-Term Business Plan)

We announce our business plan at regularly scheduled IR Day events. Currently, we disclose our business plan through 2028 on our website, Trend Micro IR Day https://www.trendmicro.com/en_us/about/investor-relations/ir-day-event.html.

(Principle 4-9 – Criteria and Qualifications for Independent Outside Directors)

The Company recognizes the importance of ensuring the independence of outside officers. At present, candidates are selected based on the requirements for independent officers as defined by the Tokyo Stock Exchange, and only after careful investigation and consideration of any relationships or interests with the Company.

(Supplementary Principle 4-10① Establishment of Nomination and Remuneration Committees)

In order to strengthen the independence, objectivity, and accountability of the Board of Directors with respect to matters such as the nomination (including succession planning) and remuneration of executive management and Directors, the Company has established Nomination and Remuneration Advisory Committees under the Board of Directors, composed primarily of independent outside Directors.

Details regarding the establishment, composition, chairperson attributes, and supplementary explanations for these voluntary committees are provided in Section II, “Status of Corporate Governance Structure and Other Management Systems for Decision-Making, Execution, and Oversight” – Item 1, “Matters Related to Directors,” of this report.

(Supplementary Principle 4-11① Approach to the Board’s Overall Balance, Diversity, and Size)

Our Board of Directors is composed of members with diverse backgrounds, perspectives, skill sets, and gender and international diversity. In addition to originating from multiple countries and regions, primarily across Asia, our members include the Company’s founder, individuals with experience in the financial and IT industries, as well as those who have held management positions outside the Company, including women.

Regarding size, the Company seeks to maintain a Board that is as small as possible while ensuring meaningful discussions and the ability to fulfill its three primary functions for the benefit of customers, shareholders/investors, and employees. At present, the Board consists of six Directors, including two independent outside Directors.

The skills matrix for Directors and other officers is disclosed in the “Officer Skills Matrix” table contained in the Reference Materials for the General Meeting of Shareholders, https://www.trendmicro.com/en_us/about/investor-relations/shareholders-meetings.html.

For the Company’s policy and procedures regarding the nomination of Director and Auditor candidates, please refer to “(iv) Policy and Procedures for the Board’s Nomination of Director and Auditor Candidates” under Principle 3-1 (Enhanced Disclosure).

(Supplementary Principle 4-11② Status of Officers’ Concurrent Positions in Other Listed Companies)

At present, our Company permits officers to hold concurrent positions within the scope that does not interfere with the execution

of their duties as Directors or Auditors of the Company, provided that such positions are not with entities in a competitive relationship with the Company and do not present potential conflicts of interest.

The principal concurrent positions of our officers are disclosed in the Notice of Convocation of the Annual General Meeting of Shareholders (Business Report), https://www.trendmicro.com/en_us/about/investor-relations/shareholders-meetings.html

(Supplementary Principle 4-11 ③ Summary of the Results of the Evaluation of the Board's Effectiveness)

The Company has determined that the Board of Directors will analyze and evaluate its effectiveness at least once a year and disclose the summary results thereof. In the fiscal year ended December 31, 2025, the Company performed the following activities:

[Evaluation process]

We prepared a questionnaire containing the following items, from the standpoint of evaluating the initiatives made toward the issues, which were identified in the previous fiscal year, and distributed it to all Directors and Supervisory Board Members to receive their responses and opinions. (Duration of the questionnaire: December 4, 2025 to December 19, 2025)

- Composition and Operation of the Board of Directors
- Management and Business Strategies
- Corporate Ethics and Risk Management
- Business Performance Monitoring and Compensation for the Executive Management
- Dialogue with Shareholders, etc.

In addition, in the current fiscal year, from the perspective of ensuring the effectiveness of the Nomination and Remuneration Advisory Committee, we conducted an evaluation of the operation of the Nomination and Remuneration Advisory Committee, exclusively with the members of the committee.

The Company's Board of Directors analyzed and evaluated its effectiveness as a whole in connection with the evaluation results based on these responses and opinions, with reference to the opinions of third party agencies and other related persons.

[Outline of evaluation results]

It has been confirmed that the Company's Board of Directors is properly operated under a well-balanced structure and effective in fulfilling its roles and responsibilities. We also confirmed that the Nomination and Remuneration Advisory Committee is being operated properly.

Regarding the succession planning for the CEO, etc. and oversight of subsidiary risk management, which were identified as issues in the previous evaluation, certain initiatives were positively evaluated, while it was noted that there remains room for improvement in addressing sustainability challenges. In addition, new concerns were raised on management strategy, establishing risk assessment processes, appropriate supervision of human capital investment and human resources strategy, and provision of information to outside officers.

Based on these results, we will work to further improve our effectiveness.

(Principle 4-14 ② Training for Directors and Auditors)

We provide training for Directors and Audit & Supervisory Board Members, either upon their appointment or thereafter, tailored to each individual's skills and experience, to ensure they can effectively fulfill their roles and responsibilities. In addition, for Outside Directors and Outside Audit & Supervisory Board Members, we conduct regular briefings by department heads to deepen their understanding of the Group's business operations and related matters.

(Principle 5-1 Policy for Constructive Dialogue with Shareholders)

We conduct dialogue with shareholders and investors under the leadership of Mahendra Negi, Representative Director and Executive Vice President, with our Investor Relations department playing a central role. The IR team works in close coordination

with our Legal, Finance, and Accounting divisions to ensure effective and well-integrated communication.

Our dialogue activities include individual meetings, quarterly earnings briefings for investors and analysts, and joint seminars with securities firms covering our business operations and the latest developments in internet security. These initiatives are designed to deepen understanding of our company and its business.

Messages and feedback obtained through such dialogue are actively considered for incorporation into our future corporate activities, and are reported to the Board of Directors or the CEO when necessary. We conduct all dialogue in strict compliance with applicable laws, regulations, and internal rules regarding insider trading, and maintain a framework whereby consultations with the Chief Information Officer are undertaken when appropriate.

Action to Implement Management That Is Conscious of Cost of Capital and Stock Price

Content of Disclosure	Disclosure of Initiatives (Update)
Availability of English Disclosure	Available
Date of Disclosure Update	March 31, 2026

Explanation of Actions

<Capital Cost>

Regarding our capital cost, in addition to calculating figures based on generally accepted methodologies, we make efforts to understand the capital cost actually required by external stakeholders. We regularly conduct quarterly surveys of securities analysts and institutional investors during our earnings briefings. Based on these survey results and the figures applied in analyst reports issued by various securities firms, we currently estimate that the capital cost required of our company is approximately 7–8%.

In contrast, our ROE (Return on Equity) for the most recent fiscal year ended December 2025 was 28.2%. This represents further improvement from 20.9% in FY2024, which had already shown a significant recovery from 4.9% in FY2023. The FY2024 result also exceeded our five-year average prior to that year (14.5%, with a maximum of 20.9% and minimum of 4.9%). The lower ROE in FY2023 was mainly attributable to one-time factors: a substantial tax burden accompanying dividend payments from subsidiaries to the parent company to fund large-scale shareholder returns, and the recording of restructuring costs as extraordinary losses in efforts to improve profitability. Having moved past these one-off expenses, we have returned to a stable state in which ROE significantly exceeds the capital cost, and we expect continued improvement (see Chart (i)ROE).

For FY2026, we forecast higher earnings. Given our policy of maintaining an effective total shareholder return ratio of 100% and controlling net asset expansion, we anticipate sustaining high ROE levels, consistently exceeding the capital cost. At the end of FY2025, our stock was trading at a PBR of 6.7 times—well above 1x—and a PER of 24.8 times. We have consistently maintained a PBR far above 1x and therefore, from this perspective, believe that our shares are sufficiently valued. As such, we have not set specific improvement measures or target values aimed at further raising PBR.

Nevertheless, we remain conscious of improving shareholder capital efficiency. Our basic policy on shareholder returns is to distribute all net income generated after making investments necessary for business growth, without retaining earnings, through year-end dividends (maintaining our target payout ratio of 70%) and share repurchases in the following fiscal year, resulting in an effective total return ratio of 100%. For FY2025, our dividend payout ratio (total basis) was 70%, and our DOE (Dividend on

Equity) was 19.8%, which we consider significantly above the market average (see Chart (ii)DOE (Dividend on Equity)). This high DOE is attributable to the combination of reduced cash holdings (returning surplus funds) and a high payout ratio. Even after the substantial shareholder return conducted in 2024, our cash position remains above the minimum required level, enabling us to continue enhancing capital efficiency through further shareholder returns and M&A activities.

<Company-Specific Program to Encourage Employee Stock Price Awareness>

We have implemented a compensation program designed to ensure that employees, including those at the managerial level, share the same viewpoint as shareholders and remain highly conscious of changes in corporate value through the stock price. In addition to the standard Companies Act–based stock option program for directors and certain executive employees, we have adopted our proprietary stock price–linked incentive plan, the “CPU Award.” The CPU Award grants employees virtual shares, with the company paying cash based on the stock price. This “Virtual Share” structure delivers stock price–linked rewards without issuing actual shares. The program was conceived to encourage everyday stock price awareness and corporate value enhancement among employees. It also addresses challenges posed by traditional stock option schemes, including the requirement for grants to be in units of one or more shares, the difficulty of aligning with compensation levels across countries, and issues related to increased potential stock dilution. We believe this system fosters corporate value growth by encouraging stock price consciousness not only among executives but also across our global workforce.

<Dialogue with Shareholders>

Led by our IR department, we actively conduct meetings with securities analysts, shareholders, and institutional investors. In FY2024, we held a total of 529 meetings, based on participant count. Breakdown: sell-side 14%, buy-side 86%; domestic investors 25%, overseas investors 75%. In addition, our CFO participated in three major overseas investor conferences organized by securities firms during the year, conducting 59 meeting slots in total. Based on this level of engagement, we believe we maintain ample dialogue with investors.

For existing shareholders, our CFO and Corporate Governance department proactively seek dialogue opportunities, identifying major shareholders via substantial shareholding reports and engaging with them approximately twice a year. Topics discussed vary but have recently included changes to shareholder return policies, deeper consideration of succession planning, and enrichment of sustainability report content. We will continue making efforts to hold broad and frequent dialogues, thereby enhancing corporate value through two-way discussions.

<Approach to Cash Holdings>

Our general business cash flow structure involves receiving payment from customers upon commencement of service provision and then incurring costs over the contract period. Accordingly, costs associated with providing services arise progressively after receiving customer payments. The portion of customer payments received that corresponds to future service obligations is recorded as “Deferred Revenue” under liabilities on the balance sheet. We believe it is important to secure funds for these confirmed future costs and carefully evaluate any cash outflows.

We define our “actual cash holdings” as cash and deposits plus marketable securities plus investment securities. Our concept of “surplus cash” is represented by actual cash holdings minus deferred revenue. Following the significant shareholder return conducted in 2024, our actual cash holdings have substantially decreased. As of December 31, 2025, the amount after deducting

deferred revenue was negative, and we consider surplus cash to be virtually nonexistent at present (see Chart (iii) Shrinking “holding Cash”).

2. Capital Structure

Foreign Shareholding Ratio	30% or more
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Status of Major Shareholders

Name or Company Name	Number of Shares Owned	Percentage (%)
The Master Trust Bank of Japan, Ltd. (Trust Account)	33,624,000	25.72
Custody Bank of Japan, Ltd. (Trust Account)	14,580,200	11.15
Chang, Ming-Jang	5,367,000	4.10
BNYM AS AGT/CLTS 10 PERCENT	3,620,618	2.77
THE NOMURA TRUST AND BANKING CO., LTD. AS THE TRUSTEE OF REPURCHASE AGREEMENT MOTHER FUND	2,643,700	2.02
BNYMSANV RE BNYMSANVDUB RE LEGAL (AND) GENERAL UCITS ETF PLC	2,303,832	1.76
SMBC Nikko Securities Inc.	2,081,555	1.59
Japan Securities Finance Co., Ltd.	2,071,700	1.58
HSBC HONG KONG—TREASURY SERVICES A/C ASIAN EQUITIES DERIVATIVES	2,019,640	1.54
STATE STREET BANK AND TRUST COMPANY 505001	1,951,568	1.49

Name of Controlling Shareholder, if applicable (excluding Parent Companies)	-
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Name of Parent Company, if applicable	None
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Supplementary Explanation

The status of the major shareholders listed above is based on the shareholder register as of December 31, 2025.

1. According to the large shareholding report made available for public inspection dated September 1, 2025, Mitsubishi UFJ Trust and Banking Corporation and two other companies were reported to hold a total of 7,159 thousand shares (5.08%) as of August 25, 2025. However, as we were unable to confirm the actual number of shares held as of December 31, 2025, this holding has not been included in the above list of major shareholders.

2. According to the amendment report made available for public inspection dated September 19, 2025, Sumitomo Mitsui Trust Asset Management Co., Ltd. and one other company were reported to hold a total of 9,974 thousand shares (7.08%) as of September 15, 2025. However, as we were unable to confirm the actual number of shares held as of December 31, 2025, this holding has not been included in the above list of major shareholders.

3. According to the amendment report made available for public inspection dated November 27, 2025, Nomura Securities Co., Ltd. and two other companies were reported to hold a total of 14,207 thousand shares (10.08%) as of November 19, 2025. However, as we were unable to confirm the actual number of shares held as of December 31, 2025, this holding has not been included in the above list of major shareholders.

4. According to the amendment report made available for public inspection dated December 18, 2025, BlackRock Japan Co., Ltd. and eleven other companies were reported to hold a total of 11,767 thousand shares (8.35%) as of December 15, 2025. However, as we were unable to confirm the actual number of shares held as of December 31, 2025, this holding has not been included in the above list of major shareholders.

3. Corporate Attributes

Listed Stock Exchange and Market Segment	Prime Market
Fiscal Year-End	December
Business Sector	Information & Communication
Number of Employees (Consolidated) as of the End of the Previous Fiscal Year	1,000 or more
Net Sales (Consolidated) for the Previous Fiscal Year	¥100 billion or more but less than ¥1 trillion
Number of Consolidated Subsidiaries as of the End of the Previous Fiscal Year	10 or more but fewer than 50

4. Policy on Measures to Protect Minority Shareholders in Conducting Transactions with Controlling Shareholder

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5. Other Special Circumstances which May have a Material Impact on Corporate Governance

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II. Business Management Organization and Other Corporate Governance Systems regarding Decision-making, Execution of Business, and Oversight

1. Organizational Composition and Operation

Corporate Governance System	Company with Audit and Supervisory Board*
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*Referred to as "Company with *Kansayaku* Board" in the Corporate Governance Code reference translation

Directors

Number of Directors Stipulated in Articles of Incorporation	8
Directors' Term of Office Stipulated in Articles of Incorporation	1 year
Chairperson of the Board	Representative Director other than Chairperson or President
Number of Directors	6
Election of Outside Directors	Elected
Number of Outside Directors	2
Number of Independent Directors	2

Outside Directors' Relationship with the Company (1)

Name	Attributes	Relationship with the Company*											
		a	b	c	d	e	f	g	h	i	j	k	
Koichiro Tokuoka	Academic												
Fukuzo Inoue	From another company								△				

*Categories for "Relationship with the Company".

(Use "○" when the director presently falls or has recently fallen under the category; "△" when the director fell under the category in the past; "●" when a close relative of the director presently falls or has recently fallen under the category; and "▲" when a close relative of the director fell under the category in the past.)

- Person who executes business for the Company or its subsidiary
- Person who executes business for or a non-executive director of the Company's parent company
- Person who executes business for a fellow subsidiary
- Person/entity for which the Company is a major client or a person who executes business for said person/entity
- Major client of the Company or a person who executes business for said client
- Consultant, accounting expert, or legal expert who receives large amounts of cash or other assets from the Company in addition to remuneration as a director/Audit and Supervisory Board Member
- Major shareholder of the Company (in cases where the shareholder is a corporation, a person who executes business for the corporation)
- Person who executes business for a client of the Company (excluding persons categorized as any of d, e, or f above) (applies to director him/herself only)
- Person who executes business for another company that holds cross-directorships/cross-auditorships with the Company (applies to director him/herself only)
- Person who executes business for an entity receiving donations from the Company (applies to director him/herself only)
- Other

Outside Directors' Relationship with the Company (2)

Name	Designation as Independent Director	Supplementary Explanation of the Relationship	Reasons for Appointment
Koichiro Tokuoka	○		<p>This Director is a professor at the Graduate School of Tama University and representative director and chairperson of Life Shift, which he founded.</p> <p>Therefore, he was appointed as an Outside Director because he was deemed appropriate to provide advice and recommendations at meetings of the Board of Directors based on his perspective based on his high level of expertise in human resource development and his experience in corporate management. In addition, this Director does not fall under any of the independence standards set forth in III 5. (3)-2 of TSE's "Guideline for Listing Management, etc.," and it is deemed that there is no risk of conflict of interest with general shareholders; therefore, the Director is designated as an independent officer.</p>
Fukuzo Inoue	○	<p>The director in question currently serves as an Executive Advisor to Nippon Telegraph and Telephone East Corporation, one of our business partners.</p> <p>However, the transaction amount with this company related to our products and services for the current fiscal year is less than 1% of our consolidated sales, and thus, we do not consider it a major business partner.</p> <p>Additionally, more than 3(three) years have passed since the director retired from the board of this company, and he is not currently involved in the execution of its business operations.</p>	<p>This Director in question has served as the President and CEO of Nippon Telegraph and Telephone East Corporation (retired in 2022) and has extensive experience in the business world. We have appointed him as an outside director, believing that he can appropriately perform duties such as making important decisions and supervising business execution at our board meetings. Furthermore, the director does not fall under any of the independence criteria specified by the Tokyo Stock Exchange in "Guidelines for Listing Management, etc." III.5. (3).2, and is recognized as having no potential for conflicts of interest with general shareholders.</p> <p>Therefore, he has been designated as an independent officer.</p>
Voluntary Establishment of Committee(s) equivalent to Nomination Committee or Remuneration Committee		Established	

Status of Voluntarily Established Committee(s), Attributes of Members Constituting the Committee and the Committee Chairperson

	Committee's Name	All Members	Full-time Members	Inside Directors	Outside Directors	Outside Experts	Other	Chairperson
Voluntarily Established Committee Equivalent to Nomination Committee	Nomination and Remuneration Advisory Committee	3	0	1	2	0	0	Outside Director
Voluntarily Established Committee Equivalent to Remuneration Committee	Nomination and Remuneration Advisory Committee	3	0	1	2	0	0	Outside Director

Supplementary Explanation

Our company has established the "Nomination and Compensation Advisory Committee" as an advisory body under the Board of Directors to enhance the independence, objectivity, and accountability of the Board's functions regarding the appointment and dismissal of directors, the nomination of director candidates, and director compensation. The committee is composed of at least three members, with the majority being independent outside directors. Koichiro Tokuoka (outside director) serves as the committee chair. Additionally, auditors are invited to participate as observers.

The attendance rate for each committee member is as follows: Koichiro Tokuoka (outside director) attended all four meetings, Mahendra Negishi (Executive Vice President) attended all four meetings, and Fukuzo Inoue (outside director) attended all four meetings, resulting in a 100% attendance rate for all members.

The main deliberations and reports for the current fiscal year are as follows:

Activities of the Nomination and Compensation Advisory Committee

-Remuneration Individual Director Compensation: Review and Decision of changes to individual director compensation
 Compensation Survey (Domestic and Overseas): Review of the company's compensation position through peer comparisons in Japan and abroad-Nomination Succession Planning: Review of progress in succession planning, including confirmation of executive members who may be candidates for internal director positions and their development status-Other Information Sharing: Sharing of the latest trends and various information related to compensation and nomination, as well as other relevant matters-

Audit and Supervisory Board Member*

*Referred to as "*kansayaku*" in Corporate Governance Code reference translation

Establishment of Audit and Supervisory Board	Established
Number of Audit and Supervisory Board Members Stipulated in Articles of Incorporation	4
Number of Audit and Supervisory Board Members	4

Cooperation among Audit and Supervisory Board Members, Accounting Auditors and Internal Audit Departments

The internal audit department conducts internal audits of the Company and the Group companies based on the Internal Audit Charter. In addition to verifying, evaluating and advising the management team on whether the Company's organization, systems

and operations are operating properly and efficiently in accordance with management policies, laws and regulations, and various regulations, the department is also involved in maintaining and improving the internal control system by obtaining the advice of external consultants and regularly discussing and exchanging opinions with the internal control manager and the accounting auditor on the operation status and audit results of the Group-wide internal control system, including the Company and its subsidiaries, and by closely cooperating with them.

In addition, the internal audit department works to further improve the effectiveness of audits by providing opportunities for regular exchanges of opinions among the three parties, including the Auditors and the Representative Directors.

Auditors attend meetings of the Board of Directors and other important meetings, inspect important approval documents, receive reports from Directors, employees, etc. on the execution of their duties, request their explanations as appropriate, and, as necessary, visit domestic sales offices and overseas subsidiaries to investigate the status of their operations and property. They also provide opportunities for regular exchanges of opinions with Directors.

Meanwhile, with regard to the cooperation between the Auditors and the Accounting Auditor, the Auditors receive explanations on the plans and reports from the Accounting Auditor at the time of the audit planning and at the time of the audit, and exchange opinions as necessary to improve the effectiveness of audits.

Appointment of Outside Audit and Supervisory Board Members	Appointed
Number of Outside Audit and Supervisory Board Members	3
Number of Independent Audit and Supervisory Board Members	3

Outside Audit and Supervisory Board Members' Relationship with the Company (1)

Name	Attributes	Relationship with the Company*												
		a	b	c	d	e	f	g	h	i	j	k	l	m
Kenichiro Jomen	CPA													
Miwako Funamoto	Lawyer													
Taeko Izumi	CPA	△												

*Categories for "Relationship with the Company".

(Use "○" when the director presently falls or has recently fallen under the category; "△" when the director fell under the category in the past; "●" when a close relative of the director presently falls or has recently fallen under the category; and "▲" when a close relative of the director fell under the category in the past.)

- Person who executes business for the Company or its subsidiary
- A non-executive director or an accounting advisor of the Company or its subsidiaries
- Person who executes business for or a non-executive director of the Company's parent company
- An Audit and Supervisory Board Member of a parent company of the Company
- Person who executes business for a fellow subsidiary
- Person/entity for which the Company is a major client or a person who executes business for said person/entity
- Major client of the Company or a person who executes business for said client
- Consultant, accounting expert, or legal expert who receives large amounts of cash or other assets from the Company in addition to remuneration as a director/ Audit and Supervisory Board Member
- Major shareholder of the Company (in cases where the shareholder is a corporation, a person who executes business for the corporation)
- Person who executes business for a client of the Company (excluding persons categorized as any of f, g, or h above) (applies to the auditor him/herself only)
- Person who executes business for another company that holds cross-directorships/cross-auditorships with the Company (applies to the director/auditor him/herself only)

- l. Person who executes business for an entity receiving donations from the Company (applies to the person him/herself only)
 m. Other

Outside Audit and Supervisory Board Members' Relationship with the Company (2)

Name	Designation as Independent Audit and Supervisory Board Member	Supplementary Explanation of the Relationship	Reasons for Appointment
Kenichiro Jomen	○		<p>This Auditor is appointed as Outside Auditor based on the Company's judgment that he is able to conduct fair and neutral audits utilizing his deep insights acquired through his knowledge and experience mainly as a certified public accountant, and a high level of points of view based on his expertise.</p> <p>In addition, he does not fall under any of the independence standards set forth in III 5. (3)-2 of TSE's "Guideline for Listing Management, etc.," and it is deemed that there is no risk of conflict of interest with general shareholders; therefore, he is designated as an independent officer.</p>
Miwako Funamoto	○		<p>This Auditor is appointed as Outside Auditor based on the Company's judgment that she is able to conduct fair and neutral audits utilizing her deep insights acquired through her knowledge and experience related to corporate legal affairs mainly as an attorney-at-law, and a high level of points of view based on her expertise.</p> <p>In addition, she does not fall under any of the independence standards set forth in III 5. (3)-2 of TSE's "Guideline for Listing Management, etc.," and it is deemed that there is no risk of conflict of interest with general shareholders; therefore, she is designated as an independent officer.</p>
Taeko Izumi	○	<p>The auditor in question was employed at our company for approximately two years between 1998 and 2000.</p> <p>It has been about 25 years since their departure.</p>	<p>This Auditor is appointed as Outside Auditor based on her professional knowledge and experience as a certified public accountant, as well as her practical experience with multiple-listed companies. We believe that this</p>

		After leaving the company, they gained experience at other firms and are currently working as an independent consultant.	background enables her to ask pertinent questions and express opinions to ensure the validity and appropriateness of the decision-making processes of both the Board of Directors and the Board of Auditors. In addition, she does not fall under any of the independence standards set forth in III 5. (3)-2 of TSE's "Guideline for Listing Management, etc.," and it is deemed that there is no risk of conflict of interest with general shareholders; therefore, she is designated as an independent officer.
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Matters Concerning Independent Directors and Independent Audit and Supervisory Board Members

Number of Independent Directors and Independent Audit and Supervisory Board Members	5
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Other Matters Concerning Independent Directors and Independent Audit and Supervisory Board Members

We have designated all of our outside officers who qualify as independent officers as such.

Incentives

Implementation Status of Measures related to Incentives Granted to Directors	Introduction of Performance-linked Remuneration Scheme Introduction of Stock Options Scheme
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Supplementary Explanation for Applicable Items

We determine the granting of stock options by comprehensively assessing whether the individual is expected to continue working with us and contribute to improving our performance in the future, as well as their past contributions and anticipated impact. This evaluation process is applied equally to directors and employees of our company, as well as to directors and employees of our subsidiaries. As part of our performance-linked incentive program, certain grants are contingent upon the achievement of predetermined performance targets. We have also introduced a Cash Incentive Plan, under which payments are calculated and made based on our share price at the time of exercise, and a short-term (six-month) cash bonus scheme linked to the company's performance over that period. For further details on our performance-linked incentives, please refer to section (iii) "Remuneration Linked to Share Price or Performance" in the disclosure titled Policy for Determining the Amount or Calculation Method of Remuneration.

Persons Eligible for Stock Options	Inside Directors / Employees / Subsidiaries' Directors / Subsidiaries' Employees
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Supplementary Explanation for Applicable Items

We grant stock options to Directors and employees of the Company and Directors and employees of its subsidiaries with the aim of further enhancing their motivation and morale towards the improvement of performance of the Group, strengthening business

development with an emphasis on the interests of shareholders, and increasing shareholder value, by linking our stock price with the interests of Directors and employees of the Company and Directors and employees of its subsidiaries.

Director Remuneration

Status of Disclosure of Individual Director's Remuneration	Disclosure for Selected Directors
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Supplementary Explanation for Applicable Items

For fiscal year 2025, the total amount of remuneration and other compensation for our Directors was JPY 526 million for seven eligible individuals (including JPY 20 million for three Outside Directors). The total remuneration for Directors includes JPY 132 million from stock options granted to Directors (excluding Outside Directors), JPY 119 million from Time-Based CPU Awards (TBS), and JPY 12 million from the Company Performance Bonus (CPB). Furthermore, Directors whose consolidated total remuneration exceeds JPY 100 million, as well as the amount of their remuneration, are disclosed in the Securities Report.*The amount of remuneration, etc. to be paid as stock options is the estimated fair value per share of stock acquisition rights issued for the purpose of granting stock options based on the Black-Scholes pricing model and recorded as an expense for accounting purposes during the fiscal year, and does not represent the property profit per share that would be obtained upon actual exercise of the stock acquisition rights. For more information on TBS and CPB, please refer to "Disclosure of Policy on Determination of Amount of Remuneration or Method of Calculation."

Policy on Determining Remuneration Amounts and Calculation Methods	Established
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Disclosure of Policy on Determining Remuneration Amounts and Calculation Methods

(1) Basic Policy and Procedures for Directors and Auditors Remuneration

The remuneration for the BoD directors is designed to promote the company's medium- to long-term growth and maximize shareholder value. In particular, for executive BoD directors (responsible for business execution; Representative Director and President, Representative Director and Vice President, and Executive Vice President), the majority of their remuneration (more than 50%) is not fixed but variable, linked to stock prices or business performance, to clarify their responsibility for increasing shareholder value and improving business performance.

Similarly, the senior global group executives (Executives), who are considered potential successors to the company's BoD directors and perform equivalent duties, also have a compensation structure where the majority is variable, linked to stock prices or performance. This is based on the idea that they manage the company as a team and share in both the benefits and responsibilities of the results, similar to the executive BoD directors.

In determining compensation amounts for the BoD directors, we emphasize a fair and transparent process. The amount of remuneration, etc., is determined by the Board of Directors after consultation with the Nomination and Remuneration Advisory Committee, within the amount and content of remuneration, etc., approved by the General Meeting of Shareholders, taking into consideration business performance and the market rates of remuneration in the overseas and Japanese markets, as well as the average salaries of employees.

The remuneration of corporate auditors is limited to base remuneration (fixed) within the scope of remuneration, etc., approved by the General Meeting of Shareholders, and the granting of individual remuneration is left to the discretion of the corporate

auditors.

(2) Component and ratio of directors' remuneration

The BoD directors' remuneration is granted in accordance with the details approved at the General Meeting of Shareholders, and is structured as shown in the table.

For executive BoD directors (responsible for business execution), the remuneration consists of (i) base remuneration, (ii) stock options, and (iii) cash phantom unit awards (CPU awards). The principle is that the combined total of (ii) and (iii) should constitute the majority (50% or more) of the total remuneration (i), (ii), and (iii) in monetary terms at the time of grant.

In addition to the above, (iv) Company Performance Bonus ("CPB"), which is a short-term incentive compensation based on the company's performance, has been added to increase the transparency of the performance-linked elements that were considered as part of the base remuneration for internal BoD directors (executive directors and chairman). This will clarify that internal directors are responsible for the improvement and direction of the company's overall performance.

In consideration of the duties of outside directors, who are responsible for supervisory functions, only (i) base remuneration will be granted.

*For FY2026, in light of the phased approach to successor development, the remuneration for executive BoD directors will consist only of base remuneration and CPB.

(3) Remuneration linked to stock price or business performance

The Company grants (ii) stock options, (iii) CPU awards, and (iv) CPB to internal BoD directors as compensation linked to stock price or performance (only CPB is granted to the Chairman of the Board of Directors). The reasons for granting these awards (reasons for selecting the indicators) are as follows."

(ii) Stock options

This is a normal type of stock option. By linking our stock price to the profits received as remuneration, we aim to further increase the motivation and morale of executive BoD directors to improve business performance, strengthen business development with an emphasis on the interests of shareholders, and enhance shareholder value.

(iii) CPU Awards

CPU awards are grants of rights to receive cash payments in an amount calculated based on the average market value of our stock over a certain period of time. In addition to the incentive for executive BoD directors to increase the share price through improved business performance, the downside risk of a decline in the share price is also shared with shareholders. These aimed to increase transparency in sharing results with shareholders."

(iv) CPB

The CPB is a semiannual cash bonus awarded based on company performance. Starting in 2026, we will adopt two performance indicators—Post-GAAP margin and year-over-year growth in Annual Recurring Revenue (ARR) from annual recurring revenue for subscription products and perpetual license renewal—to both enhance transparency in sharing results with shareholders and make clear the responsibility of the Company's directors for improving overall performance and executing the corporate strategy. The Post-GAAP margin is defined as operating profit calculated on Post-GAAP revenue (sales prior to certain audit-related adjustments) with the addition back of specified costs not directly linked to core operating activities, such as amortization of

acquisition-related intangible assets. Since Post-GAAP incorporates deferred revenue, it aligns with our strategy of building predictable and sustainable ARR.

ARR refers to predictable, stable revenue generated through ongoing contract renewals and is a central pillar of our growth strategy. Combining these two indicators as the evaluation criteria for CPB is considered an appropriate approach to achieving a long-term balance between profitability and growth, thereby enhancing shareholder value. This is a cash bonus based on short-term (6 months) company performance.

The year-over-year growth rates (pre-GAAP margin, annual recurring revenue for subscription products and perpetual license renewal) have been selected as performance indicators. The objective was to increase transparency in sharing results with shareholders, while at the same time making it clear that internal BoD directors are responsible for company-wide performance improvement and direction. We are now aware that growth in operating income on a pre-GAAP basis (sales before deferred revenue) is an important management indicator, and we disclose our operating income on a pre-GAAP basis to our shareholders and investors in our earnings announcements. Our costs are designed to achieve this pre-GAAP growth. We believe it is appropriate to select the pre-GAAP margin, which is the amount of pre-GAAP operating income minus the specified costs, as our performance target because it includes some costs such as depreciation of intangible assets related to acquisitions that are not directly linked to operating activities. We also believe that the selection of annual recurring revenue for subscription products and perpetual license renewal is appropriate and consistent with our strategy."

(4) Policy and Method for determining remuneration, etc. for individual directors

The amount of individual remuneration for executive BoD directors (responsible for business execution) is determined within the scope of the amount and details of remuneration approved at the General Meeting of Shareholders, by consulting the Nomination and Remuneration Advisory Committee, taking into account the business roles of individual directors, business performance, remuneration rates in overseas and Japanese markets (including region, skills, experience, and marketability), and the salary of employees, with the content deliberated by the Nomination and Remuneration Advisory Committee then decided by the Board of Directors.

The amount of individual remuneration for the Chairman of the Board and outside directors is determined by consulting the Nomination and Remuneration Advisory Committee, with the content deliberated by the committee and then decided by the Board of Directors. However, if it becomes necessary to grant additional fixed compensation within a reasonable range for individual outside directors due to the occurrence of additional duties that differ from their usual responsibilities, the determination of the amount and timing of such additional compensation for each individual will be delegated to the respective directors of our company who are members of the Nomination and Remuneration Advisory Committee.

(5) Timing of remuneration to Directors

The timing of granting remuneration, etc. to directors and corporate auditors is as follows.

- (i) Base remuneration: The amount determined by the Board of Directors is granted in equal installments over 12 months.
- (ii) Stock options and (iii) CPU awards: To be granted in accordance with the terms and conditions separately stipulated in the contract between the director and the Company based on the details determined by the Board of Directors.
- (iv) CPB: If the target is achieved after the half-yearly settlement of accounts, the first half will be granted in August and the second half will be granted in February of the following year.

Support System for Outside Directors (and/or Outside Audit and Supervisory Board Members)

We communicate relevant information to outside directors by inviting them to attend Board of Directors and other meetings, and by sending meeting materials in advance along with explanations of their content, using email and other communication channels through the responsible department.

Our communication with outside auditors follows essentially the same approach as with outside directors. In addition, prior to Board meetings, the Standing Auditor provides detailed explanations during the Audit & Supervisory Board meetings. For standing outside auditors, beyond the above measures, our Legal Department provides information on matters related to compliance and corporate governance, our Accounting and Treasury Departments provide information on accounting matters, and other relevant departments prepare and explain necessary documents as appropriate.

Status of Persons who have Retired as Representative Director and President, etc.

Information on Persons Holding Advisory Positions (*Sodanyaku, Komon*, etc.) after Retiring as Representative Director and President, etc.

Name	Job title/ position	Responsibilities	Terms and Conditions of Employment (Full/part time, with/without remuneration, etc.)	Date when former role as president/ CEO ended	Term
-	-	-	-	-	-

Number of Persons Holding Advisory Positions (*Sodanyaku, Komon*, etc.)
After Retiring as Representative Director and President, etc.

0

Other Related Matters

We currently have no individuals who have assumed the position of Advisor or Consultant after retiring from the top management role.

2. Matters Concerning Functions of Business Execution, Auditing and Supervision, Nomination, and Remuneration Decisions (Overview of Current Corporate Governance System)

We adopt the form of a company with Auditors. To facilitate the efficient management and expedite decision-making of the Board of Directors, we have six members, a relatively small number of Directors, one of whom is a woman and five of whom are men. The female officer is our Representative Director and President. In addition, two Outside Directors have been appointed in order to further invigorate and increase objectivity in decision-making of the Board of Directors. Furthermore, the Board of Directors delegates authority and responsibility for business execution to Executives (13 of whom four are women) composed of executive officers and employees of the Group as much as possible. In addition to improving efficiency, the Board of Directors is dedicated to decision-making and supervision, which are fundamental to the execution of business throughout the Group.

The Audit and Supervisory Board consists of one Internal Auditor and three Outside Auditors (of whom two are woman), all of whom are independent. The Audit and Supervisory Board conducts fair and neutral audits in the audit of business execution.

As mentioned above, with regard to business execution, the Group's Executives, who are appointed so that the Company's policies determined by the Board of Directors are appropriately reflected in the actual business operations in each customer segment, business areas spanning dozens of countries around the world, and in each business function, are responsible for the execution of their respective business operations. For important matters related to the Group's management policies and strategies, the results of regular budget review processes and discussions by executive members are referred to in the decisions of the Board of

Directors.

In 2024, the Board of Directors met 10 times, and the respective Directors attended the following meetings.

Chang Ming Jang, Chairperson of the Board: 89% (9/8)

Eva Chen, Representative Director and President: 100% (9/9)

Mahendra Negi, Representative Director and Executive Vice President: 100% (9/9)

Akihiko Omikawa, Director and Executive Vice President: 100% (9/9)

Koichiro Tokuoka, Director: 100% (9/9)

Fukuzo Inoue, Director: 100% (7/7)

With regard to audits of business execution, all Auditors are appointed as Outside Auditors in order to ensure a fair and neutral auditing system, and certain matters are formally decided at the Board of Directors after prior discussions with Auditors, and regular meetings are held to conduct accounting audits in close cooperation with the Accounting Auditor, KPMG AZSA LLC (continuing audit period: 20 years). As a supervisory function for the entire Group, a team led by the internal control manager, who is responsible for promoting the development of the internal control system, has been organized to make efforts to ensure that the internal control system functions effectively. The internal audit department conduct audits on matters related to compliance for the entire Group, and reports to CFO and Auditors as appropriate. Furthermore, as the operation of such regulations as the Code of Conduct, which is the code of conduct applicable to all officers and employees of the Group, we receive quarterly reports from the internal audit department on whether or not there are any noncompliance with the Code.

In order to enable Directors and Auditors to fulfill their expected roles fully in the performance of their duties, pursuant to Article 426, Paragraph 1 of the Companies Act, the Company's Articles of Incorporation provide that the liability of Directors (including former Directors) and Auditors (including former Auditors) under Article 423, Paragraph 1 of the Companies Act may be exempted by resolution of the Board of Directors to the extent permitted by laws and regulations. In addition, the Company has concluded a liability limitation agreement with all two Outside Directors and four Auditors with regard to liability under Article 423, Paragraph 1 of the Companies Act. This agreement provides that Outside Directors are responsible for their duties in good faith and without material negligence in the performance of their duties, up to a maximum amount of 16 million yen, while full-time Auditor, 10 million yen, and part-time Outside Auditors, 4.8 million yen, or the minimum liability limit set forth in the law, whichever is higher, pursuant to the provisions of the Articles of Incorporation.

Furthermore, the Company has concluded a liability insurance contract for officers, etc. as set forth in Article 430-3, Paragraph 1 of the Companies Act, and is to compensate for legal damages and litigation costs using such insurance in the event any claim for damages is made against the insured during the period of insurance as a result of an act conducted by the insured based on its status. Provided, however, that any damages arising out of acts committed while recognizing that the insured has illegally benefited or expedited, committed criminal or fraudulent acts, or violated laws, regulations, rules, or control laws will not be covered by the foregoing insurance contract. The insured under such liability insurance contract for officers, etc. is Directors and Auditors of the Company and its subsidiaries, as well as managing employees of the Company and its subsidiaries, and the Company bears the full premium for all insured persons.

3. Reasons for Adoption of Current Corporate Governance System

We believe that the structure described above, taking into account our business performance, scale, and other factors, ensures both the appropriateness and promptness of decision-making, while also enabling effective audit and supervisory functions. Furthermore, to further invigorate the Board of Directors and enhance objectivity in decision-making, we invite outside directors to serve on the Board.

III. Implementation of Measures for Shareholders and Other Stakeholders

1. Measures to Vitalize General Meeting of Shareholders and Facilitate Exercise of Voting Rights

	Supplementary Explanation
Early Posting of Notice of the General Meeting of Shareholders	Notices of convocation are sent around three weeks prior to the date of the Ordinary General Meetings of Shareholders. Disclosure prior to the issuance of the notices of convocation is scheduled to take place four weeks prior to the date of the Ordinary General Meetings of Shareholders. 37th Ordinary General Meeting of Shareholders (held on March 26 2026): Notice of convocation disclosed on February 27, 2026 on TDnet and our website prior to the issuance; notice of convocation issued on March 9, 2026
Scheduling of the General Meeting of Shareholders on a Non-Peak Day	We have set the date of the General Meeting of Shareholders to avoid the peak day as much as possible so that more shareholders can visit the meeting.
Electronic Exercise of Voting Rights	The exercise of voting rights by electronic means is made possible by accessing our designated voting site from a personal computer or mobile phone.
Participation in a Platform for the Electronic Exercise of Voting Rights and Other Initiatives to Enhance Environment for Institutional Investors to Exercise Voting Rights	We participate in an electronic voting platform for institutional investors.
Provision of Notice (or Summary of Notice) of the General Meeting of Shareholders in English	Notices of convocation in English are provided on the Company's website, TSE TDnet, etc.
Other	We conduct live distribution and pre-reception of questions.

2. Status of IR-related Activities

	Supplementary Explanation	Explanation by a representative director or a representative executive officer
Formulation and Publication of Disclosure Policies	-	
Regular Investor Briefings held for Individual Investors	-	Not Held
Regular Investor Briefings held for Analysts and Institutional Investors	Following the announcement of quarterly financial results, the Company holds financial results briefings for analysts and provides explanations on financial statements from CFO and, as needed, future strategic and other matters from CEO or COO and the Director in charge of sales in the Japanese region. In December 2025, we held an IRday event and mainly explained our strategies.	Held
Regular Investor Briefings held for Overseas Investors	Briefings for institutional investors with the same content as financial results briefings for analysts held in Japan are held about once every six months. Additionally, we	Held

	actively participate in IR conferences hosted by securities firms, as well as in individual meetings. While the primary spokesperson is the CFO, the CEO also participates when necessary.	
Online Disclosure of IR Information	In addition to the timely disclosure documents such as the financial results briefing, the Company discloses financial materials used by CFO at financial results briefings for analysts.	
Establishment of Department and/or Placement of a Manager in Charge of IR	Two full-time IR personnel are assigned within the Financial Accounting Department.	
Other	-	

3. Status of Measures to Ensure Due Respect for Stakeholders

	Supplementary Explanation
Establishment of Internal Rules Stipulating Respect for the Position of Stakeholders	<p>The Code of Conduct, a code of conduct applicable to the officers and employees of the Company and all of its subsidiaries, provides for Fair Disclosure to ensure that there are no inequities in the receipt of information. It also provides that we will not engage in improper transactions with vendors that take advantage of our favorable position.</p> <p>In addition, all officers and employees are encouraged to thoroughly understand the management philosophy and business policies at company meetings, etc. held at the beginning of each fiscal year, and to be aware of customer orientation.</p>
Implementation of Environmental Preservation Activities and CSR Activities, etc.	<p>Our group aims to realize our vision of "A world safe for exchanging digital information" by conducting "security education" to raise awareness about internet threats and self-protection. Specifically, to ensure children can live safe digital lives in the future, we offer the "Internet Safety for Kids and Families" security education program to children and their parents. To date, more than 1,200 Trend Micro employees and volunteers have provided security education to over 2.9 million children and parents worldwide.</p> <p>In addition, our Group regularly recruits volunteers to participate in an NGO in the Philippines that works to liberate slum communities and provide livelihood support. Through this initiative, we have implemented housing construction projects for underprivileged communities in the Philippines. Over 990 employees have participated, building 375 houses across more than 20 different communities, supporting 2,500 households and over 3,700 children.</p> <p>Furthermore, when large-scale natural disasters occur—especially in regions where our Group operates—we conduct a donation program in which employees contribute funds, and our Group and founders match employee donations dollar for dollar. From 2008 to 2025, more than 26,500 employees</p>

	<p>have raised USD 8.1 million, which has supported 251 nonprofit charitable organizations and relief efforts for 60 natural disasters worldwide.</p> <p>Details of our Group’s sustainability and CSR initiatives can be found at: https://www.trendmicro.com/ja_jp/about/corporate-social-responsibility.html</p> <p>Within Trend Micro Incorporated (hereafter referred to as “the Company”), our Smile Project began as a long-term support initiative launched after the March 11, 2011 Great East Japan Earthquake, with the aim of bringing smiles to both disaster-affected communities and our employees. Depending on the progress of local recovery, we have implemented activities such as Internet classes from an ICT support perspective, and continue to carry out ongoing support activities. Volunteer employees visit disaster-affected areas throughout Japan, and from 2011 through the end of 2025, we have conducted 66 activities with participation from more than 790 employees in total.</p> <p>In recent years, the Smile Project has expanded to include support for children’s homes, sports activities, and cultural initiatives.</p> <p>More information about the Smile Project can be found at: https://go.trendmicro.com/jp/business/about/smile/</p> <p>From an environmental perspective, since the COVID-19 pandemic, more than 80% of our employees have shifted to remote work, contributing to reductions in CO₂ emissions at our offices. In November 2023, our Tokyo headquarters relocated to a building that uses renewable energy.</p> <p>When providing SaaS services to customers, our Group utilizes external cloud data centers. By partnering with data center providers who prioritize environmental sustainability, we strive to reduce CO₂ emissions and energy consumption, working toward a low-carbon future.</p> <p>Information on our CO₂ emissions and other environmental data can be found under “Environment” at: https://www.trendmicro.com/ja_jp/about/corporate-social-responsibility/sustainability-policy.html</p>
<p>Formulation of Policies, etc. on Provision of Information to Stakeholders</p>	<p>We endeavor to communicate our corporate philosophy and the status of business activities to our shareholders by thoroughly implementing disclosure of corporate information in a timely manner and conducting daily IR activities; and to our employees by holding regular company meetings and other direct dialogues. We also strive to provide customers and the general public with the latest information on security through our website and various other media, and hold seminars to raise awareness.</p>
<p>Other</p>	<p><Our Talent Philosophy and Global Talent Strategy></p> <p>We regard human capital as the foundation for creating corporate value. We are committed to fostering innovation and building an organization in which every employee can fully realize their potential.</p>

As a borderless, transnational enterprise, we operate free from geographical constraints. Guided by the supply of talent in each market and our business needs, we strategically attract and deploy talent on a global scale.

For example, at our key product development hubs in Taiwan and Ottawa, we leverage strong partnerships with higher education institutions and established talent pipelines to continually secure highly motivated development professionals. Similarly, as cyber threats evolve in response to changes in digital infrastructure and user behavior, we position threat researchers in alignment with attacker trends across different regions of the world.

Our sales teams are deployed locally in each market where we provide services, ensuring alignment with customer behavior and commercial practices. Our leadership team adopts a comprehensive approach to human capital investment—balancing talent supply, business requirements, and operational efficiency—to drive sustainable growth.

Inclusive Recruitment and Organizational Design

Our talent philosophy is: “Be Yourself, Be the Best Part of Yourself.”

In recruitment, we evaluate candidates fairly based on the passion, skills, and competencies required for the role, maintaining equity regardless of race, ethnicity, nationality, gender identity, age, religion, or other attributes.

We aspire to create a flat, network-based, and agile organization where all employees, regardless of position, can exercise leadership and generate value. Recognizing the rapid acceleration of environmental change driven by the emergence of generative AI, we believe that overly hierarchical structures reliant on top-down control can hinder innovation and responsiveness.

Through transparent information sharing, delegated authority, and expertise-driven decision-making, we continuously strengthen our adaptability and agility.

Continuous Learning and Preparing for AI

We provide diverse learning opportunities—including training programs, job assignments, networking, mentoring, and feedback—to deepen professional expertise.

Furthermore, with the goal of equipping all employees with AI literacy and the ability to leverage AI in their work, we conduct ongoing initiatives such as continuous AI hackathons. These efforts foster talent growth and enhance our competitive advantage. For various statistical data pertaining to human capital, please see “(iv) Statistical Data on Human Capital” at the end of this document.

IV. Matters Concerning the Internal Control System

1. Basic Views on Internal Control System and Status of Development

1. Basic Policy

(1) System for the storage and management of information relating to the execution of duties by the Directors of the Company

1) Information pertaining to the execution of duties by the Directors of the Company shall be stored and managed appropriately and reliably in a highly searchable manner according to the storage media thereof in accordance with the Regulations Governing the Management of Confidential Matters and the Detailed Regulations Governing the Management and Operation of Confidential Matters, as well as other internal regulations, and shall be maintained in a state in which the Directors and Auditors of the Company can inspect them at all times.

The storage period shall be the period specified in the Document Handling Regulations.

2) Information related to information systems shall be protected and stored in accordance with the provisions of the Information Security Policy.

(2) Rules and other systems for managing the risk of loss for the Company

1) We recognize risks related to products and services as well as risks related to internal infrastructure as risks related to the execution of our business, and establish a system for identifying and managing those risks and for persons responsible for managing individual risks.

2) We establish the Compliance, Security, and Sustainability Committee, as an organization overseeing the Company's risks and challenges related to compliance, security, and sustainability.

3) We appoint a Global Chief Information Security Officer (CISO) to oversee information security governance for the Company and the Group companies as a whole.

4) Leakage, theft, loss, destruction, and unauthorized alteration of information cause the Company to suffer serious damage and loss of confidence. Accordingly, we manage these risks based on the provisions of the Information Security Policy, the Regulations Governing the Management of Confidential Matters, the Crisis Management Guidelines, the Personal Information Protection Manual, etc.

5) In the event of an unexpected incident, we will establish an Emergency Response Office (SWAT) with the Director of the Company in charge of the Japan region as the person responsible for crisis management. This will enable us to respond swiftly and prevent the expansion of damage, including to our clients, and establish system to minimize this.

(3) System to ensure that the execution of duties by Directors of the Company is conducted efficiently

1) The Board of Directors meets regularly once every three months as a basis for a system to ensure that the execution of duties by the Directors of the Company is conducted efficiently. In addition, the Board of Directors meets as needed. For important matters related to the Company's management policies and strategies, results of discussions at Executive meetings and the periodic budget review process are referred to in making decisions on the execution of these matters.

2) With respect to the execution of business based on decisions made by the Board of Directors of the Company, the Regulations Governing Administrative Authority and the Regulations of Executives, among others, shall stipulate the respective responsible persons, their responsibilities, and the execution procedures.

(4) System to ensure that the execution of duties by Directors and employees of the Company and its subsidiaries complies with laws, regulations, and the Articles of Incorporation

1) We will establish a Code of Conduct, Regulations Controlling Transactions by Internal Parties, etc. as the basis for the Group's compliance system. The Code of Conduct shall be subject to annual Acknowledgment for all of officers and employees of the Group. In addition, each department in charge shall formulate various guidelines and conduct training as necessary.

2) We establish the Compliance, Security, and Sustainability Committee, chaired by the Representative Director, and promote the maintenance and improvement of the internal control system.

3) The Group appoints an internal control manager as the person in charge of promoting the internal control system and appoints working members headed by the internal control manager, as appropriate, and acts accordingly.

4) Directors of the Company and its subsidiaries shall immediately report to Auditors of the Company and report to the Board of Directors without delay in the event that they discover any material violation of laws and regulations or other material facts related to compliance in the Group.

5) Based on the Whistle-blowing Report Procedure, which is the regulations that stipulate the internal reporting system for violations of laws and regulations and other compliance-related matters, the Human Resources Department and the Internal Audit Department shall act as the departments responsible for the operation. The General Manager of the Internal Audit Department (Internal Auditor) shall compile the existence and content of the relevant facts and report to CFO and the Auditors on a quarterly basis, and to CEO as needed.

Provided, however, that matters deemed urgent shall be reported on a case-by-case basis.

6) Auditors of the Company may express their views and seek to formulate remedial measures if they believe there are issues with the Group's compliance system and the operation of the Whistle-blowing Report Procedure.

(5) System to ensure the appropriateness of operations in the corporate group consisting of the Company and its subsidiaries

1) In order to ensure the appropriateness of business operations at the Group companies, we shall apply the Code of Conduct and Whistle-blowing Report Procedure to all Group companies, including the Company. In addition, in accordance with the Regulations regarding Management of Associated Companies, we shall seek to identify risks related to the execution of business and establish a management system suited to the size, business content, etc. of each subsidiary, and shall periodically check the details of these.

With regard to business administration, the Company shall establish Regulations of Executives, Regulations regarding Management of Associated Companies, and Regulations Governing Finance Control and Approval and Signature Authority, and shall conduct subsidiary management through a system of approval and reporting to the Company. The Company shall monitor business administration through discussions at Executive meetings and the periodic budget review process.

Directors of the Company and its subsidiaries shall immediately report to Auditors and the Board of Directors of the Company in the event that they discover any violations of laws and regulations or other material facts related to compliance, or any other facts that may cause risk management concerns, including information security, in the Group companies.

2) We will operate an internal control system for financial reporting to ensure the reliability of financial reporting at the Company and the Group companies.

3) In the event that a subsidiary recognizes that the business management and guidance from the Company violate laws and regulations or contains other compliance-related problems, Directors of the subsidiary shall report to the Board of Directors and Auditors of the Company.

Auditors of the Company who have received such reports may express their opinions to the Board of Directors and request that they formulate improvement measures.

4) The General Manager of the Internal Audit Department (Internal Auditor) shall, as appropriate, visit subsidiaries to monitor the overall status of business execution.

5) Auditors of the Company shall visit subsidiaries as necessary to investigate the status of their operations and property.

(6) Matters relating to employees who are requested by Auditors of the Company to assist in their duties, matters relating to the independence of such employees from Directors, and matters relating to ensuring the effectiveness of instructions to such

employees

1) In the event that Auditors of the Company request employees who shall assist the duties of the Auditors (hereinafter referred to as "Auditors Staff"), appropriate personnel shall be assigned for the necessary number and required qualifications after consultation with the Auditors.

2) In the event that the Auditors Staff is to be assigned, personnel transfers, personnel evaluations, etc. of the Auditors Staff shall be determined after respecting the opinions of the Auditors to ensure independence from Directors.

3) If an Audit and Supervisory Board Member deems it necessary, the Audit and Supervisory Board Member may, upon notice to the immediate manager, instruct the employee to perform audit services, etc. on specific matters. In this case, the employee who has received such instruction shall report to the Audit and Supervisory Board Member without complying with the chain of command of the ordinary business.

4) Directors and employees of the Company and its subsidiaries shall cooperate in the development of an auditing environment to ensure that the duties of the Auditors Staff are carried out smoothly.

(7) System for reporting to Auditors of the Company by Directors and employees of the Company and its subsidiaries or by those who received reports from them, and system for ensuring that persons making reporting are not subject to adverse treatment by reason of such reporting

1) Directors of the Company shall report the following matters to Auditors of the Company.

1) Items resolved at Executive meetings

2) Matters that may cause significant damage to the Company

3) Important matters in the management situation

4) Important matters related to risk management, including the status of audits and maintenance and operation of internal controls, and information security

5) Material violation of laws, regulations, and the Articles of Incorporation

6) Changes in and introduction of the accounting policies

7) Other important compliance issues

In addition, employees of the Company and its subsidiaries may report any material facts regarding 2), 4), 5) and 7) directly to Auditors of the Company.

2) We will maintain the proper operation of the Code of Conduct and the Whistle-blowing Report Procedure applicable to all of the Company's Group companies to ensure an appropriate system for reporting violations of laws, regulations, and other compliance issues to Auditors of the Company.

3) The Whistle-blowing Report Procedure stipulates that all reports should be handled with care and that we should make every effort to keep the person who made the report confidential, and that the person who made the report should not be treated disadvantageously.

(8) Matters related to the procedures for advance payment or reimbursement of expenses arising from the execution of the duties of Auditors of the Company and other matters related to the policy for the treatment of expenses or liabilities arising from the execution of such duties

1) In the event Auditors deem it necessary to perform their duties, they may seek the opinions of outside experts, such as attorneys-at-law and certified public accountants, and may request advance payment or reimbursement of expenses necessary for the execution of duties of the Auditors, including expenses for such request.

(9) Other systems to ensure that audits by Auditors of the Company are conducted effectively

1) Representative Directors of the Company shall set up opportunities to regularly exchange opinions with Auditors of the

Company in order to communicate with them. In addition, in order to deepen the understanding of Auditors of the Company on the nature of our business, we shall set up opportunities to hear from our employees about the operations in charge, as necessary. 2)The Internal Audit Department, which is in charge of internal audits, shall hold regular discussions and exchange opinions with Auditors of the Company on the results of internal audits to exchange information and work closely with them.3)Directors of the Company ensure that Auditors of the Company have the opportunities to attend important meetings, such as the Compliance, Security and Sustainability Committee and Executive meetings, to monitor the Board of Directors and other important decision-making processes and the status of business execution.4)Auditors of the Company shall be able to inspect requests for Approval by Representative Director and other important documents related to the execution of business, seek explanations from Directors and employees as necessary, and express their opinions.5)We strive to invite attorneys-at-law, certified public accountants, tax accountants and other outside experts to appoint Outside Auditors.

2. Status of the Internal Control System

(1)We have established a Code of Conduct as the basis for the Group's compliance system, and conduct annual Acknowledgment for all of officers and employees of the Group.(2)As an organization overseeing the Company's risks and issues related to compliance, security, and sustainability, we convene the Compliance, Security and Sustainability Committee once every half year. In addition, in order to maintain and improve compliance awareness, we have established an annual schedule for in-house training for our officers and employees and conduct regular training.(3)Auditors, the internal audit department, the internal control department, and the Accounting Auditor regularly discuss and exchange opinions on the operation status and audit results of the internal control system for the entire Group, including the Company and its subsidiaries, and work closely to improve the operation status of the internal control system.(4)In addition to attending important meetings, including meetings of the Board of Directors, and reviewing important documents, such as requests for managerial approval, the Auditors deepen their understanding of the Company's business and ensure the effectiveness of audits through such means as quarterly review meetings by the Representative Directors, the General Manager of the Audit Department and the Auditors, regular exchanges of opinions between the Representative Directors and the Auditors, reports from Directors and employees, and interviews with employees regarding their duties.

2. Basic Views on Measures for Eliminating Anti-Social Forces and Status of Development

1. Basic Policy

In the event of unjust demands or obstructions by anti-social forces or organizations, the Legal Department of the Company shall act as the supervising department to manage information in an integrated manner. In addition, under close partnerships, the relevant departments shall coordinate and cooperate with the police, attorneys-at-law, and other external specialized agencies to systematically respond to such demands or obstructions and shall not provide any benefit. Moreover, for any reason whatsoever, the Company will absolutely not engage in backroom transactions or fund provision in response to unjust demands by anti-social forces, and in the event of emergency, will not hesitate to take both civil and criminal legal countermeasures.

In addition to clarifying said basic policy in the Code of Conduct of the Group, the code shall stipulate that, based on this policy, all Directors, officers, and employees of the Group companies are required to take a firm stance toward anti-social forces and organizations that threaten the order and safety of civil society, to not have any relations with them, to firmly reject their demands, and to immediately report any unjust demand or obstruction to the Legal Department.

2. Status of Establishment of Internal Systems to Eliminate Anti-Social Forces

As the department in charge, the Legal Department of the Company confirms, in cooperation with relevant departments, that business partners with which the Company has repeatedly and continuously had business do not qualify as anti-social forces. In

addition, the department has taken measures such as to establish contractual provisions for the elimination of anti-social forces with respect to new business partners and make individual judgments in accordance with the nature of the transactions. In addition, we have prepared the Basic Regulations for Eliminating Anti-Social Forces and response manuals based on the Basic Rules.

V. Other

1. Adoption of Anti-Takeover Measures

Adoption of Anti-Takeover Measures	Not Adopted
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Supplementary Explanation for Applicable Items
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2. Other Matters Concerning the Corporate Governance System

<<Summary of Timely Disclosure System>>

We are fully aware that the timely and appropriate disclosure of corporate information to investors is the bedrock of a sound securities market. We constantly strive to conduct our business with integrity by, for example, ensuring prompt, accurate, and fair disclosure of corporate information from the investors' perspective. We also stipulate corporate disclosure in the Code of Conduct, which applies to all officers and employees, and periodically publicize and raise awareness of corporate information. Specifically, we have established the following systems.

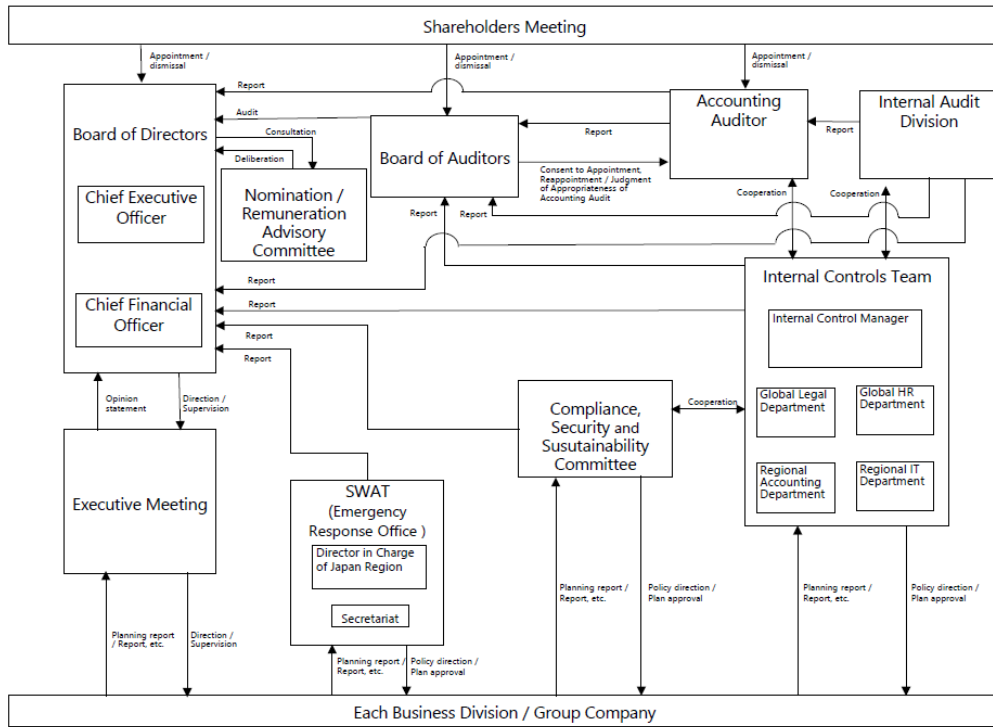
When information that is considered important within the Company is generated, each department must immediately report the information to the person in charge of information management. We have a system to collect information promptly and comprehensively.

The Director in charge of disclosure, who is a Representative Director, and the Legal Department, which is the department responsible for information management, shall determine whether or not such information collected from each department falls within the scope of decisions, occurrences, account settlement information, etc. set forth in the Listing Regulations and other relevant laws, regulations, and rules, and shall be disclosed by the Financial Accounting Department, which is the department responsible for disclosure, with the approval of the Director in charge of disclosure and the department responsible for information management as soon as the decision is made by the Board of Directors or the generation/occurrence of such information. The disclosure of information will be conducted in accordance with our "Information Disclosure Guidelines," which stipulate the procedures for such disclosure.

In addition, regardless of the necessity of timely disclosure in accordance with the Listing Regulations and other relevant laws, regulations, and rules, the Company will disclose such information appropriately if it determines that it is a matter to be disclosed after analyzing and examining such information, mainly by the Director in charge of disclosure and the department responsible for information management.

Following the Corporate Governance System (schematic diagram), we include at the end of this report figures illustrating: (i) ROE, (ii) DOE (Dividend on Equity), and (iii) shrinking "holding cash" as part of our initiatives to achieve management that is conscious of capital cost and share price; as well as (iv) Various Statistical Data on Human Capital, as described in "Our Talent Philosophy and Global Talent Strategy."

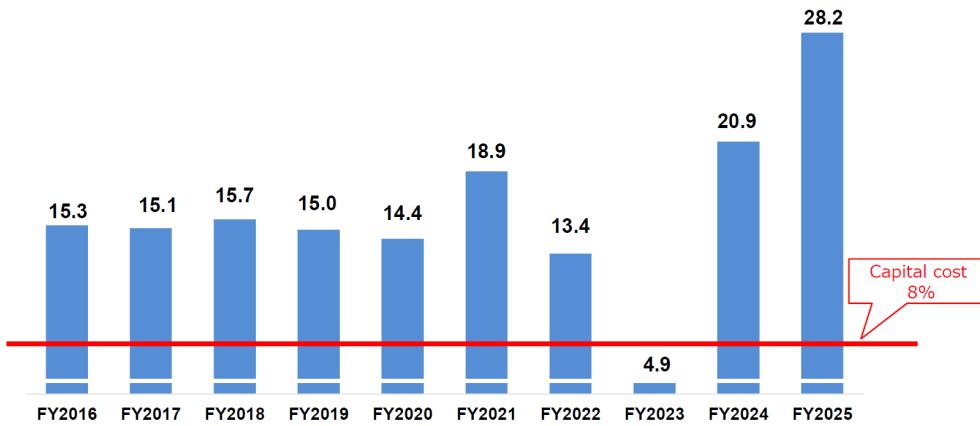
Corporate Governance System (schematic diagram)



(i) ROE

(%)

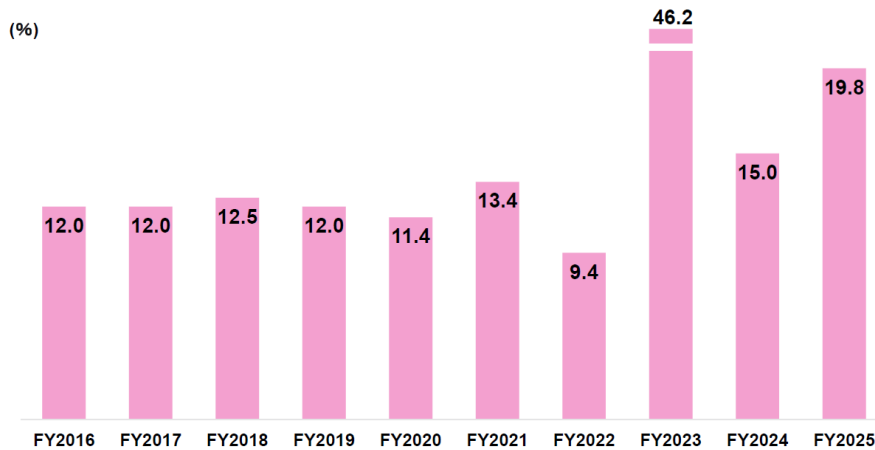
Consistently exceeded the Capital cost of *7% to 8%



* Capital cost of 7% to 8% is based on Survey of investors & analysts

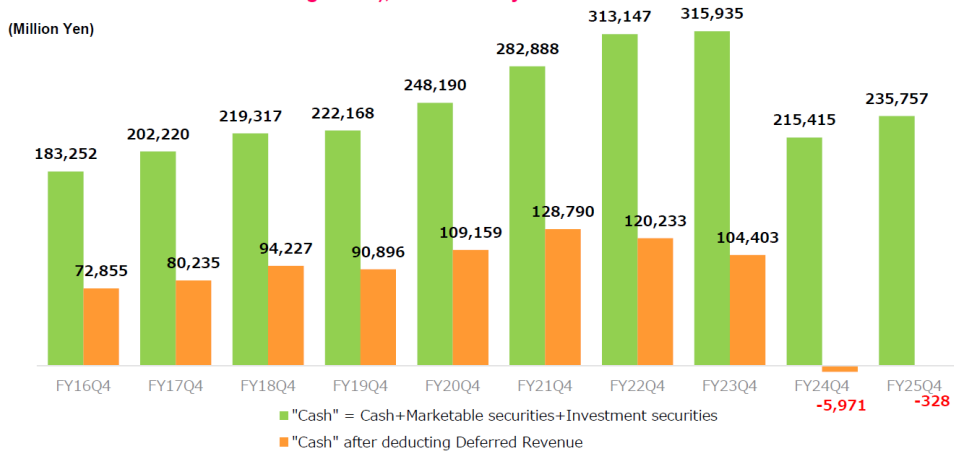
(ii) DOE (Dividend on Equity)

Due to the synergistic effect of cash reduction (return of retained earnings) and the high dividend payout ratio, our DOE has reached an even higher level.



(iii) Shrinking "holding Cash"

The holding "Cash," after deducting Deferred revenue (which is the consideration for future service obligations), has currently shrunk to a net-zero level.



(v) Various Statistical Data on Human Capital as of 2025/12/31

Female Ratio (female full-time employees)

	2025	2024	2023	2022
Japan	27%	27%	27%	27%
Group	30%	35%	29%	29%

Reference FY2024 Basic Survey on Equal Employment by the Ministry of Health, Labour and Welfare Percentage of women

	IT industry average	Average of all industries
full-time employee	N/A	27.6%
over manager	15.0%	13.1%

<https://www.mhlw.go.jp/toukei/syokan/iss/04/071-c08/08.pdf>

Female Ratio (female at or over manager)

	2025	2024	2023	2022
Japan	19%	17%	17%	18%
Group	24%	24%	27%	27%

Reference Domestic Statistics (Employment Survey) Entry and Leave by Industry Ministry of Health, Labour and Welfare

2024	9.8%	14.2%
2023	12.8%	15.4%
2022	11.9%	15.0%
2021	9.1%	13.9%

<https://www.mhlw.go.jp/toukei/syokan/iss/04/071-c08/08.pdf>

Ratio of retirements

	2025	2024	2023	2022
Japan	16%	12%	6%	8%
Group	18%	16%	12%	19%

The following statistics are for Trend Micro Inc. (Japan only) only.

Ratio of foreign employees

	2025	2024	2023	2022
over manager	3%	2%	2%	3%

Ratio of mid-career hires

	2025	2024	2023	2022
over manager	84%	86%	88%	85%

Ratio of childcare leave by gender of regular employees

	2025	2024	2023	2022
Male	53%	48%	41%	23%
Female	100%	89%	100%	100%

Ratio of full-time employees taking paid holidays

	2025	2024	2023	2022
acquisition rate	77%	74%	76%	75%

END