

Nippon Sanso Holdings Group Investor Relations (IR) Policy (Basic Principles for Dialogue and Disclosures Concerning IR Activities)

We engage in constructive dialogue with market participants (including shareholders, investors, and securities analysts) based on the concept of fair disclosure (“FD”) to realize sustainable growth and mid- to long-term corporate value improvement. In addition, we endeavor to enhance our IR activities by providing fair, timely, and appropriate explanation and disclosure of accurate information, including the status of management and business operation, and to utilize for enhancing corporate value by communicating the requests and assessment by the market participants to the management to reflect them in business management.

1. Basic Approach towards IR Activities

- (1) We intend to maintain timeliness, accuracy, fairness, and continuity, and make clear disclosure of information required for valuation of corporate value.
- (2) We will actively engage with market participants with integrity and in compliance with FD Rules to build a trusting relationship.
- (3) We as a group promote IR activities. We emphasize proactive dialogue with market participants, and endeavor to engage in dialogue at various opportunities, mainly by the management.
- (4) We provide periodic feedback to the management including by reporting to the Board of Directors on requests and valuation by the market participants captured through IR activities.

2. IR Information Disclosure Policy

(1) Basic Approach

We will make timely disclosure in compliance with relevant laws and regulations as well as rules set forth by the listed exchanges. In addition, as a global corporation engaged in business development around the world, we actively disclose in Japan and overseas such other information of high interest to the market participants and information that will be useful for promoting understanding of our group companies. We pay attention to continuity and consistency of information disclosure.

(2) Method of Disclosure [Provision of Fair Access Method]

Information disclosure based on Financial Instruments and Exchange Act shall be made through the electronic disclosure system under the Financial Instrument and Exchange Act

Electronic Disclosure for Investors' Network (EDINET) and posted quickly on our website. Timely disclosure based on the Securities Listing Regulations shall be made through the timely disclosure network system operated by the Tokyo Stock Exchange (TDnet) and posted quickly on our website.

We endeavor to make fair information disclosure in Japan and overseas on information that does not fall under timely disclosure.

3. Initiatives Concerning IR Activities

Department in charge of IR is established to create a framework for information disclosure and enhancing dialogue, with President and CEO as well as the directors in charge providing explanation on our business performance and management strategy and participating in questions and answers sessions at opportunities for dialogue with market participants.

4. Method and Procedure for Timely Disclosure

To make fair, timely, and appropriate disclosure, we set forth specific methods and procedures for information disclosure in the “Nippon Sanso Holdings Group Code of Conduct” and the “Guideline Concerning Internal Information Management and Insider Trade Restrictions” applicable to our group companies.

- (1) Decision making required for timely disclosure including whether timely disclosure is required, its timing, contents, and methods, shall be determined by the information security officer.
- (2) Department in charge of IR will ensure FD and thoroughly manage information from the perspective of insider trading prevention and make disclosure on such information. If the timely information disclosure concerns a subsidiary, the department in charge at such subsidiary shall make disclosure pursuant to instructions from the department in charge of IR at the Company.

5. Quiet Period

To ensure fairness of information disclosure, we have IR Quiet Period to prevent leakage of material information concerning the business performance of group companies before the announcement of financial results. The Quiet Period shall be the period between the day after the closing of each quarter until the announcement of financial results. During the period, we will not respond to inquiries concerning financial results, and will not hold individual IR meetings and presentations in principle. Provided, however, the above shall not apply in case of occurrence of a material event requiring timely disclosure.

This policy shall be revised or abolished by the Board of Directors of the Company.

Established on February 2nd, 2021