



MEMBERSHIP

April 23, 2026

To Whom It May Concern:

Company Name: CHUBUSHIRYO CO., LTD.
(Stock code: 2053, TSE Prime Market and
NSE Premier Market)
Representative: Kyoichi Fujita
Representative Director and President
Inquiries: Toshihiro Itoh
Director and Vice President and General
Manager of Administration Division
(Telephone: +81-52-204-3050)

Notice of Partial Revision to Basic Policy for Internal Control System

CHUBUSHIRYO CO., LTD. (“the Company”) announces that, at the Board of Directors meeting held today, it resolved to partially revise its Basic Policy for Internal Control System. The changes are underlined.

1. System to ensure compliance with laws and regulations and the Articles of Incorporation by Directors and employees in the execution of their duties

The Company and its group companies (collectively, “the Group”) shall treat its corporate motto and charter, along with other regulations related to the compliance system, as a code of conduct for all officers and employees to act in compliance with laws and regulations, the Articles of Incorporation, and social norms. To ensure thorough implementation of this code of conduct, the General Affairs and Personnel Department shall oversee compliance initiatives across the Group and provide training and education to officers and employees. The Internal Audit Office shall audit the status of compliance in coordination with the General Affairs and Personnel Department. These activities shall be reported periodically to the President, the Board of Directors, and the Audit & Supervisory Board. Furthermore, the Group shall establish a whistleblower protection system as a reporting framework for any conduct suspected of violating laws and regulations.

2. System to retain and manage information necessary for the execution of duties by Directors

Information and documents related to the execution of duties by Directors shall be recorded in written documents or electromagnetic media and appropriately retained and managed in accordance with the Regulations for Document Management, the Regulations for Confidential Document Management, and the Regulations for Document Retention. Directors and Audit & Supervisory Board Members shall have access to these documents and media at all times in accordance with the relevant rules.

3. System regarding regulations and other matters for managing risk of loss

The Company shall establish the Regulations for Risk Management to provide the basic principles of risk management for the Group and to enable appropriate responses to various risks surrounding its business operations. In addition, the Company shall establish a Risk Management Committee to oversee risks from a centralized perspective, aiming to prevent risks, minimize damage through prompt and appropriate responses when risks arise, and prevent recurrence—thereby preserving the corporate value of the Group. The Risk Management Committee shall be chaired by General Manager of Administration Division, who is the Director in charge of risk management, and primarily composed of members of the Management Council and the heads of each department at the head office.

In accordance with the Regulations for Risk Management, the General Manager of Administration Division shall designate the department responsible for managing each of specific risks such as those related to corporate strategy, business operations, environment, and natural disasters and shall comprehensively and systematically manage risks across the entire Group. In addition, the Internal Audit Office shall conduct audits of the status of risk management of each department and group company, and report the results to the President, the Board of Directors, and the Audit & Supervisory Board.

4. System to ensure the efficient execution of duties by Directors

In order to formulate the Group's growth strategy, the Company shall employ the following management control systems to enhance the efficiency of the execution of duties by Directors:

- (1) The Board of Directors formulates the Company's fundamental management policies, which define group-wide targets shared by all officers and employees. In addition, the Board establishes a medium-term management plan covering a three-year period.
- (2) Division heads in charge of each division determine specific measures to be implemented within their respective divisions, as well as the framework for efficient business operations.
- (3) Department heads and department managers in charge of each department, under the instructions of the relevant Division head, decide and implement specific measures to be executed within their departments.
- (4) The Board of Directors reviews each month the Group's monthly performance results and require each division head to performance analysis and report on measures to achieve the targets.
- (5) Based on the discussions described in (4) above, department heads and department managers in charge of each department improve specific measures to be undertaken by each department and pursue a more efficient system for carrying out business operations.

5. System to ensure appropriateness of operations in the corporate group comprising the Company and its subsidiaries

- (1) In order to establish internal control within the Group, the General Affairs and Personnel Department is designated as the department responsible for overseeing internal control across the entire Group. This department shall develop a framework by which discussions, information sharing, and communication of instructions and requests regarding internal control can be implemented efficiently within the Group.
- (2) The Business Management Office establishes a system to ensure the proper execution of operations by each Group company in accordance with the Regulations for Managing Subsidiaries and Associates.
- (3) Division heads, department heads, department managers, and the presidents of each group company have the authority and responsibility for establishing and operating internal controls that ensure the appropriateness of operations within their respective departments and other related units.
- (4) The Internal Audit Office conducts internal audits of the Group in accordance with the Regulations for Internal Audit, and report the results to the President, the Board of Directors, and the Audit & Supervisory Board.

6. Matters concerning the employees when Audit & Supervisory Board Members request for employees to be assigned to support their work and matters concerning the independence of the said employees from the Directors

Audit & Supervisory Board Members shall have the authority to direct employees to assist them with operational audits. Employees who receive such instructions from the Audit & Supervisory Board Members shall not be subject to the direction or command of Directors, department heads, and department managers or other managers with respect to those instructions. Matters concerning appointment of employees who assist the Audit & Supervisory Board Members shall be subject to prior consent of the Audit & Supervisory Board.

7. Matters relating to the policy for prepayment or reimbursement procedure of expenses to be incurred from the execution of duties by Audit & Supervisory Board Members and handling of other expenses or obligations incurred from the execution of such duties

When an Audit & Supervisory Board Member requests the Company to prepay expenses or settle obligations incurred from the execution of duties, the Company shall promptly process such expenses or obligations, unless the expenditure is deemed not necessary for the execution of duties of the respective Audit & Supervisory Board Member.

8. System for Directors and employees to report to the Audit & Supervisory Board and to Audit & Supervisory Board Members, and system to ensure that no one is treated unfairly because of what they have reported

- (1) Directors and employees of the Group shall provide necessary reports and information in accordance with the provisions established by the Audit & Supervisory Board and upon request from each Audit & Supervisory Board member.

- (i) Matters resolved by the Board of Directors
- (ii) Matters deliberated by the Management Council
- (iii) Matters that may cause significant damage to the Group
- (iv) Important matters related to the monthly business performance
- (v) Important matters concerning the internal control system, internal audit status, and risk management
- (vi) Serious violations of laws and regulations and the Articles of Incorporation
- (vii) Operation of and reports under the whistleblower protection system
- (viii) Other important matters related to compliance

- (2) Employees of the Group may report directly to the Audit & Supervisory Board members upon discovering any material facts related to items (iii), (v), (vi), (vii), or (viii) in the preceding paragraph.

- (3) The Company will take necessary measures to ensure that no disadvantageous treatment is given to any Director or employee who reports to the Audit & Supervisory Board members because of what they have reported. This policy shall also be stipulated in the Regulations for Whistleblower Protection.

9. System to ensure the effective performance of audits by the Audit & Supervisory Board

- (1) The Audit & Supervisory Board shall regularly exchange opinions with the President and the Internal Audit Office.
- (2) The Audit & Supervisory Board shall also regularly exchange opinions with the Accounting Auditor.
- (3) The Audit & Supervisory Board Members shall be provided with a framework to receive important reports through attendance at significant meetings such as the Board of Directors meeting and the Management Council meeting, as well as through access to important approved documents.

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.