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Notice Regarding the Status of Implementation of Measures to Prevent Recurrence

As announced in the "Notice Regarding Change of Representative Director and Executive Personnel Changes" dated October 6, 2026, under its new management structure, FreeBit Co., Ltd. (the "Company") is sincerely working to implement and firmly establish the measures to prevent recurrence set forth in the "Notice Regarding Publication of the Investigation Report of the Special Investigation Committee and Formulation of Measures to Prevent Recurrence" dated October 6, 2026, as its top-priority issue, in order to enhance the transparency and soundness of its management. The Company hereby announces the current status of implementation of each measure to prevent recurrence, as set forth below.

1. Organizational Structure

To promote the measures to prevent recurrence, following a study project, the Company resolved today to establish a Recurrence Prevention Promotion Committee. To maintain independence and neutrality, an outside director serves as chairperson of the committee, and the committee members consist of persons who were not involved in this matter. Beyond the committee members, the administrative divisions also take a leading role in cooperating on the measures to prevent recurrence, so that they are implemented on a company-wide basis. Furthermore, as part of the management of the FreeBit Group (the "Group"), a cooperative framework will also be established and implemented at each Group company.

For each of the following items announced as measures to prevent recurrence, the Company has established a subcommittee to carry it out.

2. Status of Implementation of Measures to Prevent Recurrence

1) Establishment of a Management Structure for Employee Inventions and Thorough Awareness-Raising

i) Revision of the Employee Invention Regulations and Establishment of a Management Structure Based Thereon

The Company is proceeding with the revision of the procedures for inventions and devices by employees and of the regulations on employee inventions in light of the amendments to the Patent Act, as well as the review of its intellectual property management structure. The Company is reviewing this structure so that intellectual property is managed in accordance with the work rules, the detailed operational rules on employees' side jobs, and other regulations.

ii) Education and Training for Officers and Employees
As officers and employees lacked a proper understanding and knowledge of the employee invention system and the related internal regulations and procedures, the Company is preparing a plan for education and training for officers and employees.

2) Strengthening the Management Structure Regarding Conflicts of Interest and the Mixing of Personal and Corporate Interests
i) Strict Operation of the Approval Process for Competing Transactions and Conflict-of-Interest Transactions
The Company is reviewing the procedures for appropriately identifying competing transactions and conflict-of-interest transactions by directors. In addition, to prevent Board of Directors resolutions from becoming a mere formality, the Company is reviewing the management of matters submitted for resolution at Board of Directors meetings.
ii) Strengthening Verification of Business Necessity
As the business necessity of the Company's transactions had not been sufficiently examined, the Company is reviewing the approval procedures for proceeding with transactions. The Company is also reviewing procedures for distinguishing directors' personal activities from the Group's business and for regularly confirming business necessity.

3) Strengthening the Checks-and-Balances Function over the Founder-President
i) Clarification of the Roles and Responsibilities of the Board of Directors Secretariat
Under the new management structure, in order to further enhance the transparency and soundness of management, the Company is reviewing the content of information provided to the Board of Directors and other bodies so that it covers all material facts and provides appropriate and sufficient explanations at Board of Directors meetings.
In addition, to ensure the accuracy and sufficiency of the explanations of each proposal, the Company is reviewing the Board of Directors Secretariat so that its roles and responsibilities are clarified and it functions appropriately under the direction of the Board of Directors.
ii) Strengthening Checks and Balances by Outside Directors and the Audit & Supervisory Board
To ensure that the checks-and-balances function of the Outside Directors and the Audit & Supervisory Board works effectively, the Company is reclarifying the roles and responsibilities of the Outside Directors and the Audit & Supervisory Board and reviewing the matters to be confirmed by the full-time Audit & Supervisory Board members.

4) Fostering a Sense of Compliance Regarding Conflicts of Interest and the Mixing of Personal and Corporate Interests
As directors' awareness of norms regarding conflicts of interest and the mixing of personal and corporate interests was weak, the Company is preparing a plan for training for the directors of the Group on directors' duty of loyalty, conflicts of interest, the mixing of personal and corporate interests, and competing transactions, in order to ensure that they strive to maximize corporate value and remain constantly mindful of doing so.