

Policy on Dialog with Shareholders and Investors

1. Basic Stance

As stipulated in the description of the MEITEC Group's "Ideal State," MEITEC Group Holdings Inc. (the Company) aims to increase its Value to Shareholders, maximizing mid and long-term shareholders returns by creating "sound profits" based on continuous improvement of the Values. At the same time, it strives unremittingly to promote understanding of the MEITEC Group (the Our Group) among shareholders and investors, engaging in constructive dialog with them via general meetings of shareholders, investor relations activities, and other means.

When engaging in dialog, the Company's Representative Director and President/Group CEO and other members of top management take the lead in responding to shareholders and investors in a timely and appropriate manner, aiming to ensure that the shareholders and investors evaluate the Company appropriately. If shareholders or investors request an individual dialog (an interview), members of top management attend the interview as necessary given the purpose of the interview, the importance of the topics to be discussed, and other relevant matters.

2. Initiatives Relating to Disclosure and Explanation of Information

The Company has set out a separate disclosure policy to ensure that its disclosure is fair, accurate, timely, and continuous.

To encourage the understanding of the Our Group necessary for constructive dialog, the Company endeavors to ensure that its disclosure documents are written in an easy-to-understand manner with clear explanations. In disclosing and explaining its management plans and strategies, the Company indicates its policy with regard to capital strategy, as well as its profit planning and targets for key indicators.

The Company takes confidentiality relating to its competitive advantages into consideration when indicating policies.

Each month on a continuous basis the Company posts on its website the number of engineers employed at the end of the month and the utilization ratio for the month as key non-financial indicators.

The Company also endeavors to produce English-language versions of its disclosure documents, distributing them primarily via its website.

The monthly message to employees from the Representative Director and President of major operating companies will continue to be posted on each company's website.

3. Designation of Supervisor and Measures to Ensure Organic Coordination among Internal Units

The Company instituted the structure below to achieve constructive dialog so that it can understand the interests and concerns of shareholders and investors as the basis for taking appropriate action.



Supervisor: Executive Officer in charge of Investor Relations

Supervising Department: Department in charge of Investor Relations

The above supervising department, which assists the Representative Director and President/Group CEO and other members of top management in conducting dialog, ensures the accuracy of information by coordinating closely with the divisions covering sales, recruiting, and career support, as well as the departments handling corporate communications, accounting, and other areas.

When the accounts are settled each quarter, a meeting is convened comprising the top management, the supervising department, and other parties to examine the accuracy and timeliness of financial results and other information disclosed at the same time as the financial results.

4. Initiatives to Improve Means of Dialog Other Than Individual Interviews

As a means of dialog other than individual interviews, the Company holds twice-yearly results presentations at which the Representative Director and President/Group CEO provides explanations in person.

The Company strives to provide ample opportunities for the Representative Director and President/Group CEO to provide such personal explanations. He therefore attends conferences, small meetings, and other events hosted by securities companies whenever possible.

Additionally, the Company publishes business reports and annual reports, in addition to taking other measures to provide fuller disclosure encouraging a better understanding of the Our Group.

5. Measures to Ensure Appropriate and Effective Feedback to the Company

Questions, opinions, concerns, wishes, and other feedback received from shareholders and investors through investor relations activities are reported to the monthly Board of Directors' meeting on a continuous basis.

6. Measures to Manage Insider Information, etc.

The Company strives to prevent insider trading by appropriately managing critical operational or management information relating to the Group in accordance with its internal rules. The Company also strives to prevent leaks of financial results, having instituted a quiet period in its disclosure policy.

If certain persons outside the company were accidently informed of undisclosed insider information or financial results information that may have material impact on the prices of securities, the Company will disclose the relevant information in a timely and appropriate manner according to "3. Methods of Information Disclosure" in the Our Group Disclosure Policy.

End

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