

Disclosure Policy

1. Basic Policy

MITSUI-SOKO HOLDINGS Co., Ltd. (“the Company”), as a member of society, strives to contribute to the happiness of as many people as possible through our sincere activities. In order to maintain and develop relationships of trust with various stakeholders around us, including shareholders, investors, clients, business partners, employees, and local communities, the Company will disclose information in a fair and transparent manner, and respond responsibly to stakeholders through various communication activities.

2. Information Disclosure Standards

The Company will appropriately disclose necessary information in a fair and transparent manner in accordance with laws and regulations as well as the Timely Disclosure Rules established by the Tokyo Stock Exchange. In addition to information required to be disclosed by laws, regulations and the Timely Disclosure Rules, the Company will actively disclose important management and financial information that is judged to be helpful for deepening stakeholders' understanding of our management policies and business activities, as well as nonfinancial information such as environmental and social information.

3. Documents and Acts to Disclose based on this Policy

The Company will disclose the following documents and acts in accordance with this Policy. Documents and acts subject to statutory or timely disclosure are not limited to the following. If any additional requirements are provided by laws and regulations, the Company will comply with them.

i. Statutory Disclosure

Disclosure based on the Financial Instruments and Exchange Act (Securities Report, Quarterly Report, and Extraordinary Report) Disclosure based on the Companies Act (Notice of Convocation of General Meeting of Shareholders, Business Report, Financial Statements and Consolidated Financial Statements)

ii. Timely Disclosure

Financial Report and related documents thereto: Information to be disclosed upon the determination or occurrence of a material fact (including information to be disclosed voluntarily in addition to information to be disclosed in accordance with the Timely Disclosure Rules of the Tokyo Stock Exchange)

iii. Other Disclosure

Communication with analysts, institutional investors, credit rating agencies, and shareholders, etc. (disclosure of IR materials such as financial results briefings, individual interviews,

inquiries by telephone or e-mail, and financial results materials issued by the Company), Integrated Report (Value Report), Business Report, and information on financial results of subsidiaries

4. Internal System for Information Disclosure

In order to make fair and transparent information disclosures, the Company will ensure that only the employees in charge, head or officer of the division that is designated as the “Division in charge for the information disclosure subject to this Policy” in the Company’s Regulations on the Division of Administrative Functions, and the President & Group CEO are involved in the communication of the information to be disclosed. Any employee, director or officer of the Company or the Group other than those who are designated as being responsible for information disclosure in the Company’s Regulations on the Division of Administrative Functions must not, in principle, communicate with any parties participating in capital markets in order to avoid the selective disclosure of material information and to ensure consistency in the content of the disclosure.

5. Prohibition of Selective Disclosure

To prevent undisclosed material information from being selectively disclosed only to a limited number of parties in capital markets, the Company will ensure that related persons to such information, including the Company’s executives, strictly manage the information in accordance with the internal rules.

6. Material Information

For the purpose of this Policy, "material information" means undisclosed information that may affect stock or bond prices and influence investors' investment decisions. Typical examples of material information are as follows.

1. Securities Reports, Quarterly Reports, Extraordinary Reports and revised reports thereof as required to be submitted under the Financial Instruments and Exchange Act;
2. Business reports and financial statements, etc. as required to be prepared under the Companies Act;
3. Important corporate information such as the Financial Report required to be disclosed by the Stock Exchange;
4. Quarterly financial results information and changes in forecasts;
5. Medium-term Management Plan;
6. Significant acquisitions, mergers, reorganizations (sale of business, liquidation, etc.), acquisitions or disposals of significant assets;
7. Change of officers and management organization;

8. Damage resulting from disasters, damage arising in the course of business execution, occurrence of material litigations, or other loss resulting from misconduct, etc.

7. Method of Information Disclosure

The Company will disclose information required to be disclosed under laws and regulations as well as the Timely Disclosure Rules established by the Tokyo Stock Exchange in an appropriate manner, respectively, and will post the content of such information on its website as soon as possible after disclosure. In addition, with regard to material information other than that required by laws and regulations, the Company will disclose it, as necessary, using appropriate methods, such as distribution of news releases, holding press conferences and briefings, and posting on websites.

8. Quiet Period

The Company has a “quiet period” beginning from the day after the end of each quarter through the announcement of the financial results for that quarter to prevent the leakage of material information and to ensure fairness of disclosure. During this quiet period, the Company refrains from responding to questions about the financial results or related inquiries.

9. Forecasts and Future Prospects

Among the information disclosed by the Company, forwardlooking information or statements, such as future plans and forecasts, are prepared based on certain assumptions deemed reasonable at the time of disclosure and involve risks and uncertainties. Therefore, the actual results announced later may vary owing to various factors. In addition, the Company will, in principle, refrain from commenting on any third-party opinions, recommendations or performance forecasts regarding the Company. However, if there is a significant misunderstanding or incorrect description on facts, the Company may point it out.

November 22, 2021

MITSUI-SOKO HOLDINGS Co., Ltd.