



Date of enactment: December 7, 2017

Last revised date: May 13, 2021

Information Security Policy of HERUTU ELECTRONICS CORPORATION

HERUTU ELECTRONICS CORPORATION (hereinafter referred to as the “Company”) aims to continue sound business activities, secure profits, realize social contributions, and comply with laws, regulations, and corporate ethics. To this end, the Company establishes a policy regarding the preservation and utilization of the information assets it holds.

1. Establishment of system and information security policy

The Company will establish the management system necessary for maintaining and improving information security, and stipulate the measures necessary to fulfill the purpose of the information security policy.

2. Responsibility and continuous improvement in leadership

The Company's management will take the lead in properly managing information assets by complying with this policy.

3. Compliance with information asset protection, laws and regulations, and contractual requirements

In relation to business activities, the Company will comply with information security requirements regarding all confidential information, trade secrets, technical information, personal information stipulated in the Act on the Protection of Personal Information, financial information related to proper financial reporting, and contractual requirements.

4. Employee initiatives

Employees of the Company will acquire the knowledge and skills necessary to maintain and improve information security, and ensure their efforts for information security. Additionally, the Company will promote protection from threats against duties, employment, etc. of the employees.

5. Response to violations and accidents

The Company will establish a system for accurately responding to violations and accidents that go against laws, rules, norms, and contracts related to information security as a

management system, and will respond to these violations and accidents.

6. Continuation of improvement actions

The Company will continue improvement activities based on information security compliance to fulfill the purpose of the information security policy.

7. Policy revision

The basic policy will be revised as necessary under the rule management procedure established by the Company in accordance with changes in social conditions, laws and regulations, business environment, etc.

Akihiko Kinoshita

President

HERUTU ELECTRONICS CORPORATION