

Last Update: December 22, 2015

OPTiM Corporation

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The corporate governance of OPTiM Corporation (the "Company") is described below.

I . Basic Views on Corporate Governance, Capital Structure, Corporate Profile and Other Basic Information

1. Basic Views

OPTiM believes that transparency and soundness of the Company's operations are of the highest priority in growing the corporate value.

The Company strives to enrich its corporate governance according to the following basic policies.

- (1) The Company respects its shareholders rights and secures their equality.
- (2) The Company keeps aware of shareholders' histories and cooperates with them.
- (3) The Company discloses the corporate information timely and appropriately and aims to ensure transparency.

[Reasons for Non-compliance with the Principles of the Corporate Governance Code]

[Principle 3.1] Full Disclosure

(v) The Company discloses the reasons of selection of candidates for directors and audit & supervisory board members other than outside directors and outside audit & supervisory board members in the reference material of a notice of general shareholders meeting when proposing at a general shareholders meeting.

[Supplementary Principle 4.2.1]

The Company is making a comprehensive examination of plans for incentives as remuneration coupling with structure and proportion of whole remuneration and with medium- to long-term business results.

[Principle 4.8] Effective Use of Independent Directors

The Company has already appointed an outside director, who advises and supervises the Company from an independent perspective. The Company considers that there is no immediate need of appointing plural outside directors considering the company size volume and the number of employees.

The Company plans to examine the appropriateness of appointing plural outside directors taking roles and

responsibilities of the board of directors.

[Supplementary Principle 4.11.3]

The Company has not yet evaluated the effectiveness of the board of directors because of progressing examination of specific evaluation method such as viewpoints and investigation process.

[Disclosure Based on the Principles of the Corporate Governance Code]

[Principle 1.4] Cross-Shareholdings

The Company shall proceed with having cross-held shares when it is judged to be conducive to improvement of the Company's corporate value under comprehensive consideration on strengthening business relationship, merits on business and strategy, related investment amount and other demerits.

The Company deliberates on having cross-held shares every year in the board of directors for their medium- to long-term economic rationality and future outlook, and confirms the purpose of holding them and the rationality.

The Company exercises the voting rights of cross-held shares on a proposed bill appropriately with careful examination of the content and judgment of contribution to improvement of shareholders' value.

[Principle 1.7] Related Party Transactions

The Company requests an advance approval by the board of directors according to laws and ordinances when making a deal with any of the Company's directors.

The Company makes a deal with the its affiliated company or its major shareholder under a proper condition considering market quotations and gives an approval at an organization such as the board of directors and the chairman of the board according to the content and amount of the deal.

[Principle 3.1] Full Disclosure

(i) Management policy, management strategy and management plan

For the Company's management policy and management plan, please refer to the company website and publicized materials of corporate explanatory meeting.

(ii) Basic Policies on Corporate Governance

Please refer to the company website.

(iii) Policy and Procedure of Decision on Remuneration of Corporate Management and Directors by the Board of Directors Meeting

The Company determines a limit on the remuneration of directors in a resolution of a general shareholders' meeting. Remuneration of each director is determined by comprehensive evaluation of the Company's business results and the individual's contribution etc. in a resolution of the board of directors. In addition, when considering remuneration for inventions by staff created during work duties, in accordance to intellectual

property rights management rules, the result will be based on the conclusion of an investigation by invention investigative commission and a resolution conducted at a board of directors meeting.

As a future plan, the Company will investigate as necessary such remuneration using the company stock linked with medium- to long-term profits of the shareholders.

(iv) Policy and Procedure of Appointment of Corporate Management, Directors and Audit & Supervisory Board Members by the Board of Directors Meeting

The Company makes a list of candidates for its directors widely from both inside and outside the company and decides the final candidates at the board of directors considering viewpoints of performance record, insight, possession of superior management capability and ethical view etc.

(v) Reason for electing candidates for outside directors and outside audit & supervisory board members is disclosed in 1. Organizational Composition and Operation [Directors]/[Audit & Supervisory Board Members] of II. Business Management Organization and Other Corporate Governance Systems regarding Decision-making, Execution of Business, and Oversight in Management in this Corporate Governance Report.

[Supplementary Principle 4.1.1]

The board of directors makes decisions on matters that are stipulated in laws and articles of incorporation, that are related to basic policy of management and that are important for management such as medium- to long-term management plan, as prescribed in the rule and decision making authority list of the board of directors under the policy of separation of execution and supervision.

Corporate management is executing the business in accordance with the basic policy of management and management plan decided by the board of directors.

[Principle 4.8] Effective Use of Independent Directors

The Company has appointed two outside audit & supervisory board members as independent directors in addition to one outside director, and does not consider it necessary in the present condition to appoint more independent outside directors than one third of directors taking account of the company size.

[Principle 4.9] Independence Standards and Qualification for Independent Directors

The Company selects independent outside directors according to its standard based on the independence criteria defined by Tokyo Stock Exchange, Inc.

[Supplementary Principle 4.11.1]

The board of directors determines selection of candidates for directors after sufficient discussions considering the company size and medium- to long-term strategy in addition to the balance and diversity of knowledge, experience and capability of whole board of directors.

[Supplementary Principle 4.11.2]

The Company discloses the status of holding director posts of other listed companies concurrently by directors and audit & supervisory board members in reference material of general shareholders' meeting notice, corporate business report etc.

[Supplementary Principle 4.14.2]

The Corporate Planning & Administration Division holds necessary training sessions for directors based on their demand.

In addition, the Company gives explanation to newly-appointed directors in advance about matters regarding corporate profile, corporate philosophy, management condition and corporate governance, various rules and matters regarding compliance including insider trading.

[Principle 5.1] Policy for Constructive Dialog with Shareholders

(i) Designation of an executive or a director who unifies whole dialog with shareholders and oversees realization of constructive dialog

The Company continually conducts dialog with shareholders and investors for sustainable growth and medium- to long-term increase of the corporate value. The Company strives to make timely and proper information disclosures of its IR activity under the director of administration as an information handling officer.

(ii) Procedure for organic cooperation among departments of IR staff, corporate management & planning, general affairs, financial affairs, accounting, judicial affairs etc. to assist dialog

The Company appoints the director of administration as an IR handling officer as the basis of dialog with shareholders. More specifically, the director of administration, who obtains information through collective approvals and directors' meeting etc., defines a framework of IR activities, and IR staff carefully examine the content including coordination with a business connection cooperating with related departments. Legal staff check the IR content before disclosure from viewpoints of appropriateness of the content and expressions etc.

(iii) Efforts to enrich measures other than individual meetings (e.g. investors meeting and IR activities)

The Company strives to enrich information on the website focusing on timely disclosure system as described in (ii) above as the measure for dialog with shareholders. Specifically, the Company informs detailed data that cannot be followed by timely disclosures and provides introduction of products and explanation of features etc. Also the Company strives to provide information in English for foreign investors on the company website.

The Company is striving to enrich other measures of dialog with investors by holding explanatory meetings twice a year and disclosing the progress of product announcement meeting etc.

(iv) Procedure for proper and efficient feedback of shareholders' opinions and concerns obtained by dialog to corporate management and the Board of Directors

The Company strives to reflect opinions from shareholders to the corporate management for medium- to long-term increase of the corporate value by sharing them among management staff via dedicated mailing list and

also by a report to the directors' meeting regarding important opinions.

(v) Procedures for management of insider information in dialog

The Company controls insider information strictly in accordance with the rules for internal information control.

Specifically, the Company limits usage of the information to a necessary minimum number of staff and performs appropriate handling under management of the administration department.

Also, the Company prepares a system to prevent leakage of insider information by means of internal training about insider deals for all employees and separate ones for directors.

2. Capital Structure

Foreign Shareholding Ratio	Less than 10%
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[Status of Major Shareholders]

Name / Company Name	Number of Shares Owned	Percentage (%)
Shunji Sugaya	4,230,900	63.99
NIPPON TELEGRAPH AND TELEPHONE EAST CORPORATION	400,000	6.05
Shouzou Ogami	111,100	1.68
Fuji Xerox Co., Ltd.	73,660	1.11
Saga Densan Center Co.Ltd.	32,000	0.48
Matsui Securities Co.,Ltd.	24,700	0.37
Seiji Tokuda	20,000	0.30
Koichiro Nonomura	20,000	0.30
Hisao Nakajima	18,700	0.28
SBI SECURITIES Co.,Ltd.	18,500	0.28

Controlling Shareholder (except for Parent Company)	Shunji Sugaya
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Parent Company	No
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Supplementary Explanation

None to report.

3. Corporate Attributes

Listed Stock Market and Market Section	Tokyo Stock Exchange First Section
Fiscal Year-End	March
Type of Business	Information & Communication
Number of Employees (consolidated) as of the End of the Previous Fiscal Year	From 100 to less than 500
Sales (consolidated) as of the End of the Previous Fiscal Year	Less than ¥10 billion
Number of Consolidated Subsidiaries as of the End of the Previous Fiscal Year	Less than 10

4. Policy on Measures to Protect Minority Shareholders in Conducting Transactions with Controlling Shareholder

Transactions between the controlling shareholder and the Company are held to the same policies of other, common transactions. The contents and validity of transactions are discussed by the board of directors, and the transaction is definitively decided upon.

5. Other Special Circumstances which may have Material Impact on Corporate Governance

None to report.

II. Business Management Organization and Other Corporate Governance Systems regarding Decision-making, Execution of Business, and Oversight in Management

1. Organizational Composition and Operation

Organization Form	Company with Audit & Supervisory Board
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[Directors]

Maximum Number of Directors Stipulated in Articles of Incorporation	7
Term of Office Stipulated in Articles of Incorporation	2 years
Chairperson of the Board	President
Number of Directors	5
Appointment of Outside Directors	Yes
Number of Outside Directors	1
Number of Independent Directors	1

Outside Director's Relationship with the Company (1)

Name	Attribute	Relationship with the Company(※)											
		a	b	c	d	e	f	g	h	i	j	k	
Rikihei Egawa	From an outside company											Δ	

※Categories for “Relationship with the Company”

※”○” when the director presently falls or has recently fallen under the category; “Δ” when the director fell under the category in the past

※“●” when a close relative of the director presently falls or has recently fallen under the category; “▲”when a close relative of the director fell under the category in the past.

- a. Executive of the Company or its subsidiaries
- b. Non-executive director or executive of a parent company of the Company
- c. Executive of a fellow subsidiary company of the Company
- d. A party whose major client or supplier is the Company or an executive thereof
- e. Major client or supplier of the Company or an executive thereof
- f. Consultant, accountant or legal professional who receives a large amount of monetary consideration or other property from the Company besides compensation as a director/audit & supervisory board member
- g. Major shareholder of the Company (or an executive of the said major shareholder if the shareholder is a legal entity)
- h. Executive of a client or supplier company of the Company (which does not correspond to any of d, e, or f) (the director himself/herself only)
- i. Executive of a company, between which and the Company outside directors/audit & supervisory board members are mutually appointed (the director himself/herself only)
- j. Executive of a company or organization that receives a donation from the Company (the director himself/herself only)
- k. Others

Outside Director's Relationship with the Company (2)

Name	Designation as Independent Director	Supplementary Explanation of the Relationship	Reasons of Appointment
Rikihei Egawa	Yes	With the goals of introducing customers and providing management guidance and advice, this person initially entered a contract for an advisory position. This person's initial contract, however, was terminated at the same time when a new contract as an outside director for the Company was concluded. In addition, although this person was working for NTT Electronics, which has business relationship	Although this person has not conducted company administration as official staff, because of his abundant sales experience is of great use to the Company, his influence on this company with talents such as skilled risk management, and his ability to appropriately accomplish and make judgments, he has been

[Translation of the Corporate Governance Report filed with the Tokyo Stock Exchange on December 22, 2015]

CORPORATE GOVERNANCE REPORT

OPTiM Corporation

		with OPTiM under“Optimal service sales agent contract” until March 2011, it is judged, considering its transaction scale and characteristics, to have no influence on judgment of stockholders and investors	elected as an outside director. In addition, without any special interest in this company, and conducting judgment without any concern in affecting profits as a general shareholder, this person was hired as an independent director.
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Voluntary Establishment of Committee(s) Corresponding to Nomination Committee or Remuneration Committee	No
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[Audit & Supervisory Board]

Establishment of Audit & Supervisory Board	Yes
Maximum Number of Audit & Supervisory Board Members Stipulated in Articles of Incorporation	4
Number of Audit & Supervisory Board Members	3

Cooperation among Audit & Supervisory Board Members, Accounting Auditors and Internal Audit Departments

The audit & supervisory board members and internal audit leader, based on auditing plans, once every half-year, hold a meeting to discuss practical auditing research and results of such research relating to auditing policies, plans, processes and procedures. In addition, information exchange and cooperation related to business duties and auditing enforcement are promoted during each audit as necessary.

Audit & supervisory board members and accounting auditors, based on auditing plans, hold an opinion exchange meeting at least once every half-year. Coordination between the various financial statements and auditing reports are done at each financial report time, and at any time, if an item needing confirmation should arise, the audit & supervisory board member can raise an inquiry.

The internal auditing team and accounting auditor, before and after enforcing an internal audit, exchange information of the procedure or results of an audit, and discuss further checking items to be worked on. In addition, in regard to things like sales and purchases that are important parts of business flows, the internal audit leader can call for a discussion with auditors for a quick action.

Appointment of Audit & Supervisory Board Member	Yes
Number of Outside Audit & Supervisory Board Members	2
Number of Independent Audit & Supervisory Board Members	2

Outside Audit & Supervisory Board Member's Relationship with the Company (1)

Name	Attribute	Relationship with the Company(※)												
		a	b	c	d	e	f	g	h	i	j	k	l	m
Yoshinori Isagai	Professor	●												

			conducting judgment without any concern in affecting profits as a general shareholder this person was hired as an independent director.
Katsuo Yoshidomi	Yes	Although this person was a director of Hashiguchi Electric Inc. which has a rental contract regarding OPTiM's Saga Office, until March 2010, it is judged, considering its transaction scale and characteristics, to have no influence on judgment of stockholders and investors.	This person was elected as an outside auditor due to his experience at OPTiM stockholder Hashiguchi Electric Inc. as an executive in charge of management. It is thought that such experience can be used to improve OPTiM's auditing system. In addition, without any special interest in the Company, and conducting judgment without any concern in affecting profits as a general shareholder this person was hired as an independent director.

[Independent Directors/Audit & Supervisory Board Members]

Number of Independent Directors/Audit & Supervisory Board Members	3
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Matters relating to Independent Directors/Audit & Supervisory Board Members

All outside directors who fit the requirements of independent directors are designated as independent directors.
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[Incentives]

Incentive Policies for Directors	Stock Options
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Supplementary Explanation

This has been introduced to increase the morale and ambition of the Company's directors to promote achievement.

Recipients of Stock Options	Inside Directors, Inside Audit & Supervisory Board Members, Employee
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Supplementary Explanation

Stock options have been introduced with the goal to increase the morale and ambition of the staff in order to ultimately enhance the value of the Company. Stock options have been issued on March 28, 2006, March 28, 2008 and September 3, 2014. When determining the number of share warrants granted to individuals, the person's work performance is considered along with the decision of the board of directors.

[Director Remuneration]

Disclosure of Individual Directors' Remuneration	No Individual Disclosure
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Supplementary Explanation

Since there is no individual with a total remuneration of over 100 million yen, the amounts are not recorded. The individual remunerations of directors and audit & supervisory board members are not released.

Policy on Determining Remuneration Amounts and Calculation Methods	Yes
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Disclosure of Policy on Determining Remuneration Amounts and Calculation Methods

It was decided in a resolution regarding employee remuneration in a stockholders general meeting that a limit shall be enforced on the remuneration of directors and audit & supervisory board members. The remunerations of individual directors are decided by resolution at board of directors meetings, and the remunerations of individual audit & supervisory board members are decided at audit & supervisory board meetings. In addition, when considering remuneration for inventions by staff created during work duties, in accordance to intellectual property rights management rules, the result will be based on the conclusion of an investigation by invention investigative commission and a resolution conducted at a board of directors meeting.

[Supporting System for Outside Directors and/or Audit & Supervisory Board Members]

Support of outside directors and outside audit & supervisory board members is handled by the Corporate Planning & Administration Division. In concrete terms, activities such as providing advance explanations of agenda items of a board of directors meetings will be carried out. Also, conducting communication by email or phone as necessary.

2. Matters on Functions of Business Execution, Auditing, Oversight, Nomination and Remuneration Decisions (Overview of Current Corporate Governance System)

The Company has established the Audit & Supervisory Board to comprehensively consider the characteristics in the scope and projects of the Company, in order to have a corporate governance system with the greatest possible efficiency yet be flexible, which the Company considers to be of the utmost importance. Acknowledging these ideals, the Company's system including the Board of Directors and the Audit & Supervisory Board has the practical use guidelines as follows.

- The Company's board of directors is comprised of five directors and three audit & supervisory board members. They all conform to the rules and regulations of the board of directors, and, in addition to monthly regular meetings, hold extraordinary shareholder meetings as necessary. In addition, they enforce the rules of business affairs along with mutually enforcing each other's professional duties. In the board of directors meeting, the three audit & supervisory board members (two of which are outside audit & supervisory board members) attend, and they declare their opinions as necessary.

- The Company's Audit & Supervisory Board consists of the one full-time audit & supervisory board member, and two part-time (non-regular employee) audit & supervisory board members, both of whom are outside audit & supervisory board members. As each audit & supervisory board member attends the board of directors meetings, and, as necessary, attend regular meetings regarding company projects and observe directors performing their professional duties. As a general rule, an audit & supervisory board meeting is held every month, and opinions are exchanged on the state of business operations. In addition, discussion and resolutions regarding auditing

processes, auditing plans and other important auditing matters are discussed.

- The outside director and the two outside audit & supervisory board members have a limited responsibility contract as decreed by the Articles of Incorporation.
- The Company has not created a room dedicated to independent audits, however, the two leaders of the internal audit work independently and they report the results of the audits to the president. The president receives the audit results, notifies the results and improvement recommendations to the department to be audited, and they shall submit the improvement status report to the internal auditors.
- The Company's CPAs are Atsushi Tsunoda and Norihiko Asai (both of which have a contract for less than 7 continuous years), and they are limited liability auditors associated with Deloitte Touche Tohmatsu LLC. In addition, three CPAs and three other people assist with the audit. Furthermore, the audit & supervisory board members, internal audit division as well as accounting auditors have regular auditing reporting meetings, where information is exchanged as necessary in order to strengthen mutual cooperation.
- In order to deliberate particular management issues of director's business execution from a practical point of view, a risk management committee was established.

3. Reasons for Adoption of Current Corporate Governance System

The Company has established the Audit & Supervisory Board with outside audit & supervisory board members that possess an abundance of management skills and technical knowledge. The Company recognizes that this has led to the current system providing auditing and supervision with impartiality and transparency. Furthermore, on August 25, 2015, an outside director was elected in an extraordinary shareholders' meeting in order to strengthen auditing business executions.

III. Implementation of Measures for Shareholders and Other Stakeholders

1. Measures to Vitalize the General Shareholder Meetings and Smooth Exercise of Voting Rights

	Supplementary Explanation
Early Notification of General Shareholder Meeting	In accordance with the Basic Policies on Corporate Governance stipulating to take as much efforts as possible to send the notice of a shareholders' meeting prior to the legal term in order to assure sufficient evaluation period, the Company makes efforts for earlier sending.
Scheduling AGMs Avoiding Peak Days	Because the fiscal year ends in March, the Company takes as much effort as possible to find a day to hold its general shareholders' meeting on a day that is not commonly used for general shareholders' meetings by other companies.

2. IR Activities

	Supplementary Explanation	Explanation by the representative himself/herself
Preparation and Publication of Disclosure Policy	The Company has rules on dialog with shareholders in Article 6 of the Basic Policies on Corporate Governance, although it is not made in a form of disclosure policy.	
Regular Investor Briefings for Individual Investors	Explanatory meetings for individual investors are proactively held.	Yes
Regular Investor Briefings for Analysts and Institutional Investors	Explanatory meetings for analysts and institutional investors are held at fixed intervals, after quarterly financial results and yearly financial results are released.	Yes
Posting of IR Materials on Website	The Company has created a website exclusively for IR purposes, and has created a system ensuring the prompt release of information for proactive disclosure to both stockholders and investment institutions.	
Establishment of Department and/or Manager in Charge of IR	The Corporate Planning & Administration Division oversees matters related to IR.	

3. Measures to Ensure Due Respect for Stakeholders

	Supplementary Explanation
Stipulation of Internal Rules for Respecting the Position of Stakeholders	Consideration of stakeholders' interests is stipulated in Article 3 of the Basic Policies on Corporate Governance.
Development of Policies on Information Provision to Stakeholders	The Company's general IR activity policy is that it, as a listed company, has an obligation to disclose timely and appropriate information to all kinds of stockholders, should fully recognize it as essential matters and understand the position of a partner. In addition, releasing corporate information in a quick, accurate and fair manner is of the utmost importance.

IV. Matters Related to the Internal Control System

1. Basic Views on Internal Control System and the Progress of System Development

As the general objective of the Company in creating an internal structure, a "system to guarantee suitable business execution" was established at the board of directors meeting on July 11, 2014, which is a standard internal control system with a basis in current standard objectives. The outline is as follows.

1. System of the rules and Articles of Incorporation that guarantee the enforcement of the directors' professional duties

To guarantee the enforcement of the directors' professional duties, the driving force of the directors natural compliance is based on the recognition of the foundation by the management of compliance of rules, Articles of Incorporation and in-company regulation, along with the thoroughness of company ethics.

Board of directors meetings, based on rules, Articles of Incorporation, and in-company regulations, along with decision-making about important business management affairs, the supervision of directors' professional duties are enforced.

Audit & supervisory board members, with the authority to decide on rules and in-company regulations, inspect the enforcement of directors' professional duties, based on these rules set by audit & supervisory board members.

2. System to preserve and manage information that affects the enforcement of directors' professional duties

About information that affects the enforcement of directors' professional duties, in accordance to rules and in-company regulations, pertinent documents or records will be properly preserved or managed.

3. Regulations and other systems regarding management for risk of loss

Regarding management for risk of loss, a company director or staff member, based on the risk management regulations, proactively try to notice risk before it comes, along with doing the proper assessment of the result, in order to determine the result with the least damage and lowest cost to the Company, risk evasion, reduction, and shifting and other measures are necessary in advance.

4. System guaranteeing the efficient enforcing of directors' professional duties

As the system for efficiently enforcing directors' professional duties, the directors, based on rules established during board of directors meetings, with fast yet reasonable decision-making, efficient work operations will be conducted.

Furthermore, along with the board of directors making decisions about management foundation objectives and important administrative topics, they work as an organization that supervises the state of enforcing the directors work duties.

5. System of the rules and Articles of Incorporation that guarantee the enforcement of staff members' work duties

In order to guarantee rules and Articles of Incorporation that enforce staff member's work duties, deciding conduct guidelines, maintain the in-company regulations, implement compliance training, and be thorough with keeping the employee rules and ethics.

In addition, confirm performance of legal and appropriate business management, and enforce inspection through

the independent internal auditing team.

6. System for the case of an audit & supervisory board member requesting the appointment of a staff member in encouraging to give assistance in performing work duties

In the case of an audit & supervisory board member requesting the appointment of a staff member in encouraging to give assistance in performing work duties, after consulting with the audit & supervisory board member, that staff member to assist the audit & supervisory board member can be appointed.

7. Items relating to the independence from the director to the staff member in guideline 6

In order to guarantee the independence of the staff member, the staff member shall be defined as the one that has advance consent by the audit & supervisory board meeting and does not follow a director's commands.

8. Systems relating to processes for reporting to audit & supervisory board members on systems for the reporting by directors and staff

Directors and staff, in addition to matters of violation of rules and Articles of Incorporation, if there are negative affects or a fear of negative affects to the Company, will swiftly report it to an audit & supervisory board member.

In order to understand Important decision-making processes and business affairs enforcement status, audit & supervisory board members should attend board of directors meetings, along with other meetings, as well as checking important documents.

In addition, the audit & supervisory board member will hold hearings with directors periodically.

9. Other systems for guaranteeing effective performance of auditing by audit & supervisory board members

Directors and staff members will endeavor to both deeply understand the reasoning behind the audit, and create an environment to allow the audit & supervisory board members to perform their duties effectively.

In addition, in order to have effective audits, the audit & supervisory board members will engage in periodic exchanges of ideas with the president, and also cooperate with the internal auditors.

Furthermore, the audit & supervisory board members will receive explanations about the accounting audit from the Company's accounting auditor, and also conduct information exchange.

2. Basic Views on Eliminating Anti-Social Forces

It is clear that offering illegal profits to antisocial forces and having any relationship with antisocial forces must not be allowed in any form. In addition, in accomplishing societal justice, and to earn the trust of customers, the market, and society, both the Company's directors and staff should resolutely remove antisocial forces.

This company follows guidelines based on an antisocial forces handling manual in order to remove the influence of antisocial forces. Specifically, the Company uses Nikkei Telecom's investigation service and Google Search to investigate for past issues. There have been no problems found with shareholders, directors nor customers.

In addition, new employees are also checked for relationships with antisocial forces before joining. Furthermore, paid investigations background checks are held for full-time staff.

In the case of customers, the Company's sales division requests the Corporate Planning & Administration Division to preform a check when business dealings start or when an NDA form is entered.

V. Other

1. Adoption of Anti-Takeover Measures

Adoption of Anti-Takeover Measures	No
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Supplementary Explanation

None to report.

2. Other Matters Concerning to Corporate Governance System

None to report.

This document is a translation of the Japanese language original prepared solely for convenience of reference. In the event of any discrepancy between this translated document and the Japanese language original, the Japanese language original shall prevail.