# **Disclosure Policy**

### **Basic Policy**

In line with our action guideline "Take The High Road," we are working to strengthen corporate governance to increase management transparency, respond quickly to changes in the management environment and seek continuous enhancement of our corporate value. We believe that control of disclosures is an important part of corporate governance and our policy is to disclose information in a timely and appropriate manner.

We disclose information in compliance with laws and regulations concerning securities trading and the various regulations of securities exchanges and we also aim to give various stakeholders including our shareholders and investors and local communities a better understanding of the Mitsui High-tec Group. We established the Information Disclosure Committee as an organization to oversee information disclosure activities.

The Information Disclosure Committee is mostly composed of full-time Directors and the General Managers of Business Divisions. Full-time Audit & Supervisory Board Members attend deliberations as observers and seek to improve the quality and transparency of the disclosed information.

#### Information Disclosure Method

We disclose "information about decided facts," "information about emerging facts" and "financial information" on the Timely Disclosure Information Communication System (TDnet) operated by the Tokyo Stock Exchange in accordance with the Securities Listing Regulations stipulated by the Tokyo Stock Exchange. We then make announcements to the media and carry out the disclosure procedures stipulated in other laws and regulations without delay. In addition, we publish information which we should disclose as a group under "Other important information" on our website in light of the purpose of timely disclosure.

The management and operation methods we use for information disclosures are based on laws and regulations and are also stipulated in internal rules established by us, and the President and Representative Director bears ultimate responsibility for information disclosures.

# Risk Analysis Based on Factors such as Company Size, Geographical Dispersion of Bases and Type of Business

The Mitsui High-Tec Group operates globally through a total of 14 consolidated subsidiaries, one in Japan and 13 overseas. As part of activities to collect company information for timely disclosure, our consolidated management department collects financial information from each company each month and summarizes it by the twentieth of the following month.

In addition, information about each base's external environment, issues facing each company and initiatives to address them and other matters is collected daily by the Strategic Corporate Planning Division through our internal network. Every month, we convene a results meeting attended not only by the Representative Director and other officers but also by the General Managers of Business Divisions, the Presidents of domestic and overseas subsidiaries and others, for the purpose of sharing and making effective use of information within the group.

Through an internal system which channels any material company information about Mitsui High-tec and subsidiaries obtained through such measures to the President and Representative Director, we collect company information for timely disclosure.

## **Performance Forecasts and Forward-Looking Statements**

All plans, outlooks, strategies, and other statements that are not historical or present facts published on our website constitute forward-looking statements with respect to our future performances that reflect the judgments of management and are based on information available to them at the time. Please bear in mind that actual performance may differ from these statements owing to various risks, uncertainties and economic and other factors.