



FOR IMMEDIATE RELEASE

Lasertec Corporation
2-10-1 Shin-yokohama, Kohoku-ku, Yokohama
(Code 6920 / Tokyo Stock Exchange Prime Market)

Announcement of Partial Revision of “Basic policy on the establishment of internal control system and the status of establishment”

Yokohama, July 29, 2024 - Lasertec Corporation announces that it has resolved at the Board of Directors meeting held today to partially revise the “Basic policy on the establishment of internal control system and the status of establishment”. The revised parts are underlined below.

I. Internal control system that ensures proper conduct of business

Pursuant to the Companies Act of Japan and the Ordinance for Enforcement of Companies Act, we establish internal controls to ensure that the execution of duties by Directors complies with laws, regulations, and the Articles of Incorporation and to ensure that the Company executes business properly as a stock corporation.

1. Internal controls to ensure that the execution of duties by Directors and Executive Officers (hereinafter "Directors and Others") and employees complies with laws, regulations and the Articles of Incorporation

- (1) The Board of Directors discusses matters of importance regarding the Company's management at its monthly meetings and, if necessary, by holding special meetings in accordance with laws, regulations, and the Articles of Incorporation.
- (2) Audit & Supervisory Board Members and Outside Directors are guaranteed the right to attend Management Meeting, an advisory body for the President & Chief Executive Officer, and state opinions on items on the agenda under our Management Meeting rules.
- (3) In addition to audits mandated by laws, the department in charge of internal auditing conducts internal audits pursuant to our internal audit rules and reports its findings directly to the President & Chief Executive Officer. If the findings call for corrective actions, the President & Chief Executive Officer directs the manager of relevant department(s) to take the actions and report the result to him.
- (4) Pursuant to our own compliance rules, we take the following measures for overall compliance management: designate an Executive Officer in charge of compliance and risk management matters; clearly state our basic compliance policy; elucidate the basic obligations of Directors and Others and employees upon their encounter with compliance issues; establish the principles and code of conduct Directors and Others and employees should follow as a guideline of fair judgment and action when performing duties; establish organization-wide compliance management systems; enhance our whistleblower protection system; and make sure that these measures are implemented properly through the activities of the Risk Management & Compliance Committee.
- (5) We plan and provide training for employees about the laws, internal rules, and others that they should abide by to keep them well informed of compliance.
- (6) We keep updating our internal controls on matters related directly or indirectly to accounting and financial reporting to prevent mistakes and misconduct that may jeopardize the integrity of our financial reports.

2. Internal controls for proper recordkeeping and information management concerning the execution of duties by Directors and Others

- (1) We keep proper records of decision making and reporting related to Directors and Others' execution of duties by taking the minutes of the Board of Directors meetings and Management

Meeting in accordance with our rules on these meetings and archiving them for a legally or internally mandated period. We keep records of other decision making by documenting them on our internal forms and archiving them for an internally mandated period.

- (2) We prepare, maintain, store, and dispose of business documents in accordance with our document administration rules. We keep documents in good order and make them available for review by Directors and Others and Audit & Supervisory Board Members and for auditing by the Financial Auditor.
- (3) We protect important information assets such as documents, digital records, and information systems in accordance with our information security rules.

3. Internal controls to manage the risk of losses that may be incurred by Lasertec Corporation or by its subsidiaries

- (1) At the time of business planning and budget making, we properly assess the risks associated with our operation and discuss and decide on appropriate actions at monthly Board of Directors meetings and Management Meeting. We invest financial resources properly in accordance with our accounting rules and report the status of investment to the Board of Directors regularly.
- (2) In accordance with our group-wide risk management policy and risk management rules, we establish a Risk Management & Compliance Committee to engage in company-wide risk management. Resolutions adopted by the Risk Management & Compliance Committee will be reported to the Board of Directors.
- (3) We make a proper crisis response in the event of natural disaster, epidemic, or any other case of force majeure causing losses of corporate assets or dangers to personnel by promptly forming a crisis response team headed by the President & Chief Executive Officer, gathering information on the extent of losses, and taking measures to contain and minimize losses in accordance with our risk management rules.

4. Internal controls to ensure efficiency in the execution of duties by Directors and Others

- (1) We appoint Outside Directors to the Board of Directors to enhance the decision-making and oversight functions of the Board. At the same time, we have the office of Executive Officers in place and give more responsibilities to Executive Directors (Directors concurrently serving as Executive Officers) to streamline our decision-making process so that we can respond quickly to changes in the business environment and achieve sustainable growth.
- (2) We clearly define the scope of responsibility for each department in accordance with our rules concerning organization and the division of authority and duties. We also define responsibility and authority for each position in accordance with our executive authority and approval procedure rules to operate business efficiently and effectively.

5. Internal controls to ensure the proper operation of the entire Lasertec Group including subsidiaries

- (1) We appoint a manager in charge of the oversight of subsidiary administration in accordance with our subsidiary administration rules. The oversight manager oversees the administration of each subsidiary, and the Directors and Others of each subsidiary conduct its operations under the guidance of the oversight manager and in cooperation with other relevant departments. In this manner, we ensure that the subsidiaries execute their duties efficiently.
- (2) Important matters listed in our subsidiary administration rules shall be referred to the Company for final approval after receiving approval from either the subsidiary's board of directors or its representative officer.
- (3) Pursuant to the Group Compliance Management Policy and our own compliance rules, we put in place a system where the Executive Officer in charge of compliance and risk management matters advises and monitors the Directors and Others and employees of subsidiaries to ensure that their performance of duties complies with laws and regulations and with the Company's Articles of Incorporation, and where it is implemented properly through the activities of the Risk Management & Compliance Committee. In addition, the whistleblower protection system of the Company applies to all of its subsidiaries.
- (4) In addition to audits mandated by laws, the department in charge of internal auditing conducts on-site inspections of subsidiaries pursuant to our internal audit rules and reports its findings

directly to the President & Chief Executive Officer. If the findings call for corrective actions, the President & Chief Executive Officer directs each of those in charge of the matter at the subsidiary to take the actions and report the result to him.

6. Matters concerning employees who are tasked to assist the execution of duties by the Audit & Supervisory Board Members, matters concerning their independence from Directors and Others, and matters concerning insurance of effectiveness of instructions to them

- (1) We provide an assistant to Audit & Supervisory Board Members in a timely manner upon receiving a request from them. Prior consent of the Audit & Supervisory Board is required for appointment, replacement, and appraisal of the assistant.
- (2) Audit & Supervisory Board Members are free to give audit-related instructions to the assistant. The assistant will not be obliged to follow the order of Directors and Others that contradict the instructions of Audit & Supervisory Board Members.

7. Internal controls to safeguard the act of whistleblowing by Directors and Others and employees to Audit & Supervisory Board Members and to ensure that whistleblowers will not be treated unfavorably for their act

- (1) If a Director and Others or employee of the Company or its subsidiaries find a matter where serious damage has been or may have been made to the Company or if he/she witnesses an illegal act or misconduct of a Director, officer or employee, he/she must report it to the Audit & Supervisory Board immediately.
- (2) Audit & Supervisory Board Members attend Board of Directors meetings and other important meetings of the Company, including Management Meeting, to stay informed of decision-making processes and the status of operations related to important matters. They are authorized to review documents related to important management decisions and request a report, as necessary, from Directors and Others, officers, and employees on their execution of duties.
- (3) The whistleblower protection provided in the Company's compliance management rules applies to the act of whistleblowing to Audit & Supervisory Board Members. No Director and Others, officer, or employee of the Company or its subsidiaries will be dismissed, have his/her employment contract terminated, or be treated unfavorably in any manner for his/her act of whistleblowing.

8. Matters concerning policy on advance payment or reimbursement of expenses for execution of duties by Audit & Supervisory Board Members and procedure for payment of expenses and debts from their execution of duties

The Company sets aside a budget for the execution of duties by Audit & Supervisory Board Members. When there is a request for payment, including advance payment, concerning expenses or debts incurred by Audit & Supervisory Board Members for their execution of duties, it will be paid in a timely manner.

9. Other internal controls to ensure effective auditing by Audit & Supervisory Board Members

- (1) Audit & Supervisory Board Members meet with the President & Chief Executive Officer regularly to exchange opinions and maintain proper communication to perform audits effectively.
- (2) Audit & Supervisory Board Members coordinate with the Financial Auditor and the department in charge of internal audits and maintain proper communication to perform audits effectively.

2. Basic principles for exclusion of anti-social forces and establishment of internal controls for this purpose

We have adopted the following basic principles for the exclusion of anti-social forces and established internal controls for this purpose to ensure proper business conduct:

1. We are resolved to have no relationship with any anti-social forces that pose a threat to the safety and order of society. Our Directors and employees are prohibited from making use of, paying, supporting, aiding, or having a relationship of any kind with such forces and with individuals and groups associated with such forces.
2. The department in charge of general affairs is tasked to handle matters related to anti-social forces and take necessary actions with assistance from attorneys and police.
 - 1) In case we are approached by an anti-social force, we will contact the police and other authorities immediately. We will stand firmly against their demand, respond as an organization, and act lawfully.
 - 2) We are and will be a member of the league of corporate defense against anti-social forces to keep us informed of the current situation and ready to respond to an unexpected encounter.

Contact for Inquiries:

Raiji Hanashima

PR & IR Group, Corporate Planning and Control Department

Phone: +81-45-478-7111

<https://www.lasertec.co.jp>