Information Security Policy

Where we have provided you with an English translation of the Japanese language version of a webpage, the translation is provided for your convenience only and the Japanese language version will govern the relationship between you and us. If there is any contradiction between the Japanese language version and the translation, the Japanese language version shall take precedence.

Basic Principles

The basic principles of nobitel Inc. (hereafter our company) are to <u>expand the future of our</u> <u>customers</u> and <u>expand the future of all working persons</u>. We conduct our business with these principles.

Our company deals with information assets, such as customer information. These assets are highly important for our company's business.

Our directors, employees, and anyone handling the information assets will follow this policy, understanding the risks of any leakage, damage, loss, etc. We will implement activities to maintain information security, upholding the confidentiality, completeness, and availability of information assets.

Basic Policy

(1) We will formulate the information security policy and related regulations to protect information assets and operate following this policy. At the same time, we will abide by laws and regulations related to information security, rules, and other regulations, as well as contract terms with our customers.

(2) We will clarify the standards for analyzing and assessing the risks of leakage, damage, or loss related to information assets, establish a systematic risk assessment method, and regularly conduct risk assessments. Furthermore, based on these results, we will implement necessary and appropriate security measures.

(3) We will establish an information security system led by our directors in charge and clarify the authority and responsibility related to information security. We will also conduct regular education, training, and promotion to ensure the proper handling of information assets among all employees through understanding the importance of information security.

(4) We will regularly inspect and audit the status of upholding the information security policy and the handling of information assets. We will implement prompt correction measures for any deficiencies or items to be improved that have been found.

(5) We will implement proper measures to deal with the occurrence of information security events or incidents. In the unlikely event that they do occur, we will establish measures and procedures in advance to minimize the damages, promptly deal with any contingency, and implement proper correction measures. In particular, we will establish a management framework for incidents that may lead to a temporary suspension of our business. We will ensure the continuation of our business by reviewing this framework regularly.

(6) We will establish and execute an information security management system with the goal of actualizing our basic principles. At the same time, we will regularly review and improve it.

END

Formulated November 25th, 2021

Masahiro Kurokawa, Representative Director Nobitel Inc.

Our company has acquired the following certifications: the international standard "ISO/IEC27001:2013" for information security management systems (ISMS), and the Japanese certification, "JIS Q 27001:2014."

Business name: Nobitel Inc.

Qualified certification standards: ISO/IEC27001:2013/JIS Q 27001:2014 Certification number: IS 762460

Scope of registered certification: the work below at our Shinjuku headquarters

- Sales of health-related products on e-commerce websites
- Operating sports media websites
- Planning and holding sports events focusing on tennis competitions
- Development and operations of group-common membership/IT services

Certification registration agency: BSI Group Japan K.K.

Initial registration date: April 22nd, 2022

Expiry: April 21st, 2025