

# Whistleblower Policy

Enacted on Dec 6, 2019.  
Amended on Mar 27, 2020.  
Amended on Nov 12, 2020.  
Amended on Aug 10, 2023.

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## [ Addenda ]

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## [ General ]

### Article 1 (Purpose)

This policy aims to establish the matters necessary to carry out the tasks related to receiving, processing reports of violations stipulated in the Internal Control over Financial Reporting Policy and the Code of Ethics, and protecting reporters.

### Article 2 (Definitions)

- ① "Violation" means an act that violates the Code of Ethics and the Internal Control over Financial Reporting Policy.
- ② "Reporter" means a person who reports a violation stipulated in Paragraph ①.
- ③ "Cooperator" means a person who, in addition to the reporter, assisted in the investigation of the contents of the report by making statements or submitting documents in connection with the report.

### Article 3 (Scope of Application)

This policy is applied to the executives and employees of CLASSYS Inc. (hereinafter referred to as the 'Company') and its subsidiaries.

### Article 4 (Consultation and Receipt of Report)

- ① Reports shall be made to the Company's Audit Committee, a member of the Audit Committee or the Audit Committee Support Team, and the member of the Audit Committee or the Audit Committee Support Team that receives the report shall submit to the Audit Committee.
- ② The report shall be submitted in writing or by email.
- ③ The Audit Committee and its members shall ensure the confidentiality of the report matters and the reporter's personal information.

### Article 5 (Investigation and Processing of Report)

- ① The Audit Committee shall ascertain the reporter such as the personal information, the circumstances and the purpose of the report in response to the received report to specify the report matters.
- ② The Audit Committee may request interested persons or related employees to state their opinions after their attendance, submit necessary materials and documents, etc. to the extent necessary to verify the authenticity of the report.
- ③ The Audit Committee shall take necessary measures for disciplinary action, if the violation is found to be

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true after investigating the report.

## Article 6 (Closure of the Case)

- ① Any of the following case, the Audit Committee may not investigate or close the case:
  1. the report is clearly false or not valid.
  2. the information of the reporter or the person who has been reported is unknown.
  3. the reporter has received two or more requests to supplement the report or evidence and has not done so within the supplementation period.
  4. the report matters are not related to the violation or there is no verifiable evidence.
- ② If the case is closed under the provisions of Paragraph ①, the reason shall be notified to the reporter without delay.

## Article 7 (Confidentiality of Identity)

- ① Any executives or employees who know aware of the reporter shall not imply, inform or disclose the reporter's personal information or any factor that implies whom the reporters are to any other person.
- ② The Audit Committee shall obtain the written consent of the reporter if it is necessary to disclose the reporter's personal information for the purpose of investigating and processing the contents of the report.

## Article 8 (Prohibition of Disadvantageous Measures)

- ① Any executives or employees shall not impose any disadvantageous measures on the reporter for reporting violations unfairly.
- ② Notwithstanding Paragraph ①, if the reporter believes that he/she has been subjected to disadvantageous measures, etc., he/she may apply for relief to the Audit Committee or a member of the Audit Committee, and the member of the Audit Committee who receives the request for relief shall submit the application to the Audit Committee.
- ③ If the Audit Committee receives an application for relief from disadvantageous measures pursuant to Paragraph ②, the Committee shall promptly initiate an investigation and request the relevant person to restore or correct the situation.

## Article 9 (Protection of Cooperators)

Anyone whom it makes a statement and provides documents in cooperation with the investigation, including reporters shall be applied mutatis mutandis Article 7 and 8 to the confidentiality, identity protection and dealing with disadvantageous measures.

## Article 10 (Disciplinary Action, etc.)

The Company's Audit Committee and the CEO shall take measures such as disciplinary action in accordance with the Company's Personnel Regulations against executives and employees who commit violations.

[ Addendum ]

## Article 1 (Effective Date)

This policy comes into effect from December 6, 2019.

[ Addendum ]

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