

Note: This document has been translated from the Japanese original for reference purposes only. In the event of any discrepancy between this translated document and the Japanese original, the original shall prevail.

March 26, 2026

TO WHOM IT MAY CONCERN:

Company name: NOHMI BOSAI LTD.
Representative: Masahiro Hasegawa, President and Representative Director
(Securities code: 6744, Tokyo Stock Exchange Prime Market)
Inquiries: Yasuhiro Ono, Executive Officer in charge of the Public
Relations Department
(TEL : 03-3265-0230)

Approval of Recurrence Prevention Measures
Designed to Address to Improper Procurement of Certifications;
and Progress Report

NOHMI BOSAI LTD., ("**Company**") received the "Investigation Report" ("**Report**") prepared by the External Investigative Committee ("**Committee**") on July 29, 2025. In connection with this, the Company established a "Task Force for the Prevention of Recurring Cases of Improper Procurement of Certifications" ("**Task Force**"), with the head of the Task Force being the President of the Company. Since then, the Task Force has decided upon the fundamental "Recurrence Prevention Measures" ("**RP Measures**"), and the Company has implemented the RP Measures with company-wide commitment. A resolution to approve the RP Measures which were established based on the Report was passed at the Company Board Meeting on this March 26, 2026. Below is a full picture of the main RP Measures established and their progress.

As a company expected to promote safety and security in society, we are fully aware of the gravity of this situation and hereby express our profound regret. We are deeply sorry for the substantial trouble and concern caused to our customers and to other interested individuals and entities.

We sincerely accept the Committee's opinions and will perform the RP Measures in a planned and steady manner so as to prevent the recurrence of such situations. This will be accomplished by, among other measures, further strengthening the Company's internal control; thoroughly restructuring the Company's management processes related to the eligibility requirements; and providing employees with education and training. We will provide a report to the interested individuals and entities regarding the progress and results of the RP Measures on a continuing basis. All Group Companies, including the Company, will thoroughly perform the RP Measures and make its fullest efforts to recover your trust at the earliest date possible.

1. Outline of the incident and cause:

(1) Facts Discovered:

Based on the investigation conducted by the Committee and as a result of the Company's successive internal investigation, the following facts have been discovered: with regard to the procurement of certificates for managing engineer, construction work management engineer, fire defense equipment engineer, registered fire extinguishing equipment skilled worker, and other similar designations, applications were filed even where the applicant lacked the requisite eligibility requirements such as work experience; were based on false registration in the CORINS (Construction Records Information Service) Records; or were made through any other inappropriate proceedings.

(2) Root Causes:

The Committee has pointed out that these improper incidents resulted from multiple root causes operating at different levels including: underestimating the amount of work experience applicable to eligibility requirements; employees' propensity to follow their supervisors and adhere to conventional practices; the closed nature of certain Divisions; and insufficient monitoring functions and risk management.

Based on the root cause analysis provided by the Committee, the Company now acknowledges that a prevailing attitude of disregard for practical experience has long been rooted in the Company's personnel actions as well as in the Company as a whole, and there has been minimal improvement in this regard. We now deeply regret that these circumstances were allowed to exist and we will conduct a fundamental review of our attitude. In addition, we are aware that, in certain specialized divisions, the high degree of specialization may have caused operations to become overly individualized and, as a result, led to the closed operational practices of the Divisions. Furthermore, due to the nature of the Company's business to promote safety and security in society, each employee tends to avoid acting based on his/her own judgment, which may have led to behavior patterns where employees follow their supervisors or adhere to conventional practices. The Company now understands that these issues may create similar risks not only within certain Divisions but also throughout the Company as a whole. The Company sincerely accepts the Committee's root cause analysis and determined that we need to take actionable, comprehensive steps including the renovation of our corporate culture.

2. Task Force to Handle RP Measures

In order to swiftly and reliably handle the RP Measures, the Company established the "Task Force for Prevention of Recurring Cases of Improper Procurement of Certifications" ("**Task Force**") in September 2025, with the head of the Task Force being the President of the Company, and the following four expert teams were also created to handle the RP Measures:

- Corporate Culture and Education Renovation Team
Roles: Reforming the mindset of all employees and management personnel; improving all employees' and management personnel's sense of discipline; and renovating the organizational culture
- Organizational Activation / Strengthening Team
Roles: remediation of the insular culture of certain Divisions; strengthening of the risk management system; and optimization of staffing
- Risk Management / Group Monitoring Strengthening Team
Roles: To strengthen the monitoring systems of the Company and its Group companies; and to implement systems used to monitor situations related to eligibility requirements
- Team to Audit the Quality of Construction Work Performed (additionally established in October 2025)
Roles: To audit the quality of the construction work that was performed by unqualified certification holders; and customer handling

3. Particulars of the RP Measures and Progress

Based on the seven issues proposed by the Committee, the Company has performed the following particular measures:

(1) Improvement of Nohmi Bosai Group employees' mindset:

(i) Raising risk awareness among management personnel

At the Nohmi Group Management Meeting held in September 2025, at which all officers of Nohmi Group Companies were present, the Company's Chairman and Representative Director issued instructions that compliance awareness be fully reinforced; RP Measures be thoroughly performed; and measures to recover trust be taken. Furthermore, the Company's Compliance Officer provided the details on the background of the improper procurement of certificates and gave strong instructions aimed to fully ensure recurrence of such incidents does not occur. In addition, at the Nohmi Group Management Meeting held in March 2026, the Company's President and Representative Director is scheduled to address these messages. It is expected that the top management personnel will continue expressing their messages in the future.

(ii) To encourage dialogue between employees of all Group Companies (including the Company) in order to foster employees' ability to make sound judgments and take proper actions.

By focusing on the "climate of the organization" and other "structural factors" which could give rise to improper incidents, we will shift to a hands-on approach that goes beyond mere knowledge acquisition. In particular, managers within all Group Companies will act as facilitators and hold "workshops to encourage discussions within the workplace" where the topics of "psychological safety" and "due and proper decision making" will be discussed. Through these workshops, we will attempt to improve the organization's culture and establish changes in the day-to-day decision making and communication processes.

(iii) To strengthen the operation of the internal control system and successive improvement

In performing the RP Measures, we will attempt to cultivate an organizational culture which prioritizes legal compliance above all else. These attempts will be incorporated in the Company's internal control system and will be continuously improved and operated. In connection with this, we will assess the effectiveness of such attempts by (i) using a Three-Line Model monitoring framework and (ii) conducting internal audits on a regular basis. The results of such assessments will be reflected in the internal rules, processes and systems of the Group Companies. In addition, a system to continuously review and improve the RP Measures will be established, and the Group Companies as a whole will attempt to improve the effectiveness of their internal control.

(2) Review of Compliance Education

(i) Raising awareness at various kinds of training sessions

At various training sessions, the CSR Promotion Department (under the Compliance Division) has, as part of its compliance explanations, begun to raise awareness among employees regarding the "failure to meet the eligibility requirements for managing engineer certificates, etc." in order to prevent the recurrence of similar eligibility requirement incidents in the future .

(ii) Revamp of Compliance Education Program Audited by External Experts

The education program will be revamped under the evaluation and supervision of external expert institutions, and action-oriented training sessions that go beyond mere knowledge acquisition will be implemented from 2026. In particular, an online training session (for 3.5 hours) will be provided to all managerial personnel, and the program will be re-designed to enable the trainees to become familiar with the incidents including the organizational factors that contributed to the improper actions. In addition, a "workplace discussion workshop" will be incorporated into the program to connect learning to practice and will be deployed within the Group Companies as a whole.

(3) Eliminating organizational insularity

(i) The Company conducted a survey of the Group Companies to determine the level of organizational openness and to assess the communication environment. The Company then reviewed the result of the survey

In January 2026, the Company conducted a survey to confirm the degree of organizational insularity within all Group Companies, including the Company, and also collected basic data for improvement. In conducting the survey, we took steps to safeguard the psychological security of the survey respondents, and we also received support from external experts when we compared the Group Companies (including the Company) to other companies and analyzed the results of the survey. We will begin looking into various measures based on the results of the survey.

(ii) To plan and examine human relations policies (“HR Policies”) aimed at eliminating the insular nature of the Company and improving the organization’s culture

We are in the process of making revisions to various HR Policies (such as policies related to internal mobility, performance reviews and recruitment). In addition, we are also in the process of planning and designing HR Policies to establish and execute the so-called Succession Plan (in other words, a plan to develop the skill sets necessary for personnel to accede to certain roles). We understand that these HR Policies are vital to the comprehensive renovation of our operations which includes our organization’s culture. In doing this, we will deepen our discussions and considerations from a broad range of perspectives drawing on a diverse set of knowledge, which may include the opinions of our Outside Directors. Based on the assumption that these revised HR Policies would have a material impact on us, we will implement these measures in phases (including trials).

(4) To set up and strengthen the review system relating to the eligibility requirements

(i) To establish an office to receive and review certificate applications

Although, under the current system, the respective Department or Division would examine the content of the certificate application and then formally file the application, in December 2025, a certification-related coordination group (“Certification-related Coordination Group”) was newly established within the CSR Promotion Department (under the Compliance Division) to provide a single point of contact. In addition, the Company introduced a new protocol under which the Certification-related Coordination Group will, among other things, examine the content of the application sheet. Furthermore, a system to check ahead of time whether a certificate applicant meets the eligibility requirements has been introduced. The range of certificates subject to the above new system will expand in stages, and, eventually, all certificates are expected to be subject to this system in the future.

(ii) Re-examination of the scheme for the application of certificates intended to be filed by employees with the certification bodies and the Company’s approval thereof:

The Company has decided upon the following workflow related to personnel’s procurement of certificates, which will be in effect from April 2026:

1. organizing the certificate eligibility requirements (including whether work experience is required) and identifying which certificates are necessary;
2. developing a certificate application process (in other words, develop an internal process for application, verification and registration); and implement the process;
3. standardize the certificate procurement process used by all Group Companies and make dual-approval mandatory (in other words, an application must be approved by the supervisor of the Department or Division to which the applicant belongs AND the Certification-related Coordination Group);

4. have the Certification-related Coordination Group manage and control the information required for certificate applications or examinations by personnel from the Group Company (including the Company);
5. have the Certification-related Coordination Group collectively manage and control data related to the certificates held by the Group Company (including the Company) personnel.

(iii) Ensuring compliance with the requirements needed to obtain fire defense equipment engineer qualifications

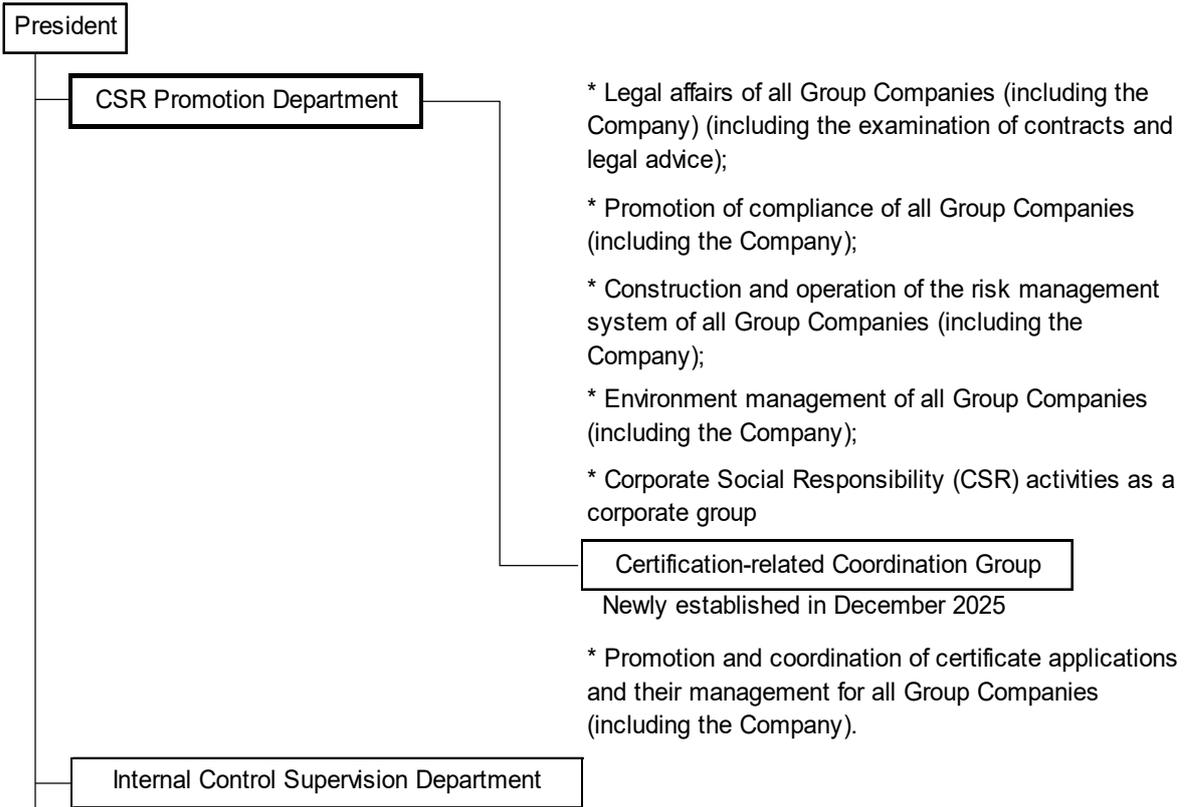
From April 2026, we will ensure that all new-hires satisfy the eligibility requirements for the defense equipment engineer certificate examination by expanding the content of their training sessions. In addition, we will also review the operational procedures related to the handling of eligibility requirements for experienced hires.

(5) Strengthening the risk management system

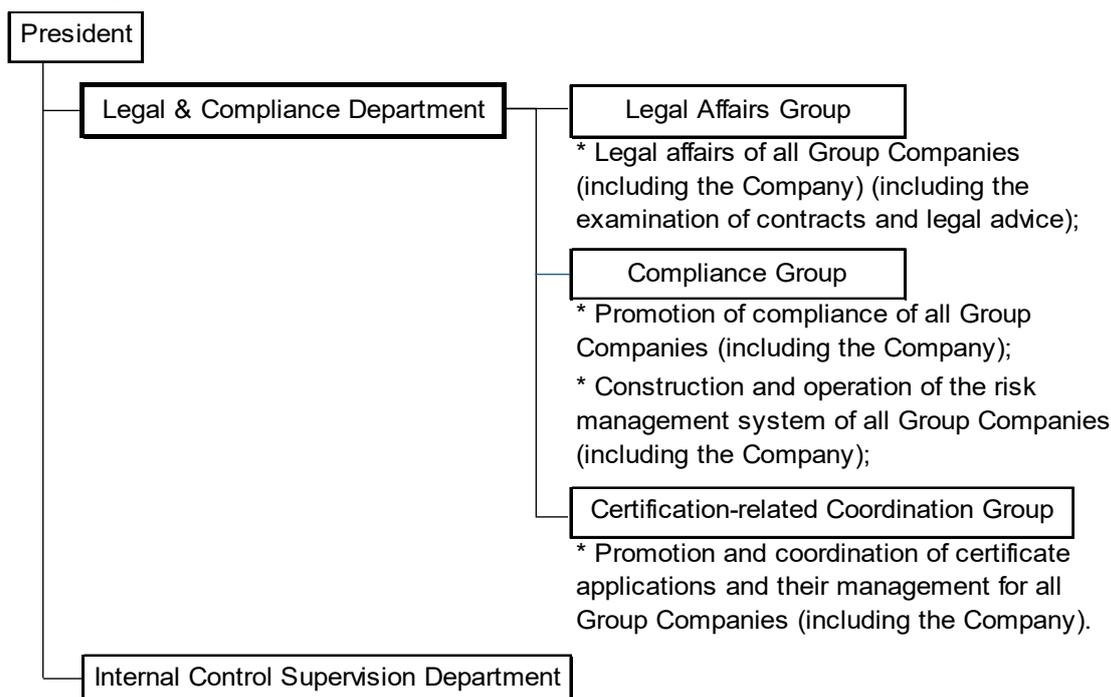
(i) Construction of an organizational system to strengthen risk management

In addition to reviewing the changes to the risk management system for certain Departments or Divisions, we have also reviewed the risk management system of all Group Companies (including the Company). As part of such review, we newly established a certification-related coordination group ("**Certification-related Coordination Group**") within the CSR Promotion Department (under the Compliance Division) in December 2025. Such Group will promote: the coordination of the system for filing certificate applications; and the strengthening of the management of certificates held. In addition, the name of the "CSR Promotion Department" will be renamed to "Legal & Compliance Department" in June 2026. The Legal & Compliance Department will increase staff headcount and conduct reviews of the management system.

Current Organization:



New Organization: The sections will be renamed in June 2026.



(ii) Construction of a risk management system using outside expertise

We will construct a new risk management system which identifies the risks related to the Group Companies (including the Company) or risks relevant to the nature of our business using the expertise of outside consulting companies.

(iii) Strengthening and improving the Risk Management Committee structure

In April 2026, we will review the governance of the risk management system of all Group Companies (including the Company) to strengthen the Risk Management Committee's reporting lines and allocation of roles. A compliance leader will be deployed to each section to enhance the effectiveness of the risk management system by having them take responsibility for communications, reports and discussions within their sections. At the same time, the functions of the Executive Office of the Risk Management Committee will be strengthened, which will further enhance the operational basis of the Risk Management Committee. The related section officers and the compliance leaders will be sent to attend training sessions held by outside organizations. Such efforts are expected to contribute to the recalibration of personnel's sense of risk and compliance standards.

(iv) Consideration of establishing a system for the appropriate deployment certificate holders

We are in the process of examining which policies are needed to allow us to systematically develop managing engineers, expert engineers, etc. We are also considering how they may be appropriately deployed with the aim of contributing to the systematic deployment of certificate holders and the development of engineers in each section. Our major challenges include the systematic development and deployment of material certificate holders. In the future, we will have discussions regarding how to properly deploy personnel on a continuous basis, and we will consider the establishment of a systematic development framework by,

among other means, collecting information on the intended number of certificate holders needed in each section.

(6) Fundamental shift in officers' mindset

(i) Training sessions for managerial staff

In February 2026, we provided all officers, including the Outside Directors, with compliance training sessions. The officers were encouraged to have discussions among themselves regarding the desirable direction for the Company, risks within our organizational culture and the importance of officers' statements and actions. The sessions and related discussions were premised on the actual improper cases that occurred and took into account the adverse effects that compliance-related breaches against the company can have. The root causes of improper cases by other companies were also considered. In addition, the officers were encouraged to examine specific steps that could be taken to prevent the recurrence of such incidents and to fundamentally shift their mindset. Going beyond this initial training session in this year, we will continue to hold these training sessions for managerial staff on an ongoing basis.

(ii) Shifting the Officers' mindset by improving their sense of risks

The Risk Management Committee will increase the frequency of its reporting to the Board of Directors and also to the Executive Officers Meetings so as to discuss major risks to the Company and the status of measures taken to address such risks. By doing so, it is expected that the officers' sensitivity to risk will be increased, and a framework to understand and identify risk at an earlier stage will be established. In addition, our ability to detect early warning signs will be strengthened using external expertise, including cases where Outside Directors will participate as observers. Furthermore, each officer will proactively engage with the risks in their respective business territory, and the officers will have discussions among themselves at Risk Management Committee meetings to examine and execute the steps or measures needed to handle the situation. Moreover, the officers will share information about such risks among themselves to ensure that the Company, as a whole organization, actively engages to resolve the matters.

(7) Strengthening of the framework used to monitor the branches and Group Companies

(i) Strengthening of monitoring through the Internal Control Supervision Department

From April 2026, the Internal Control Supervision Department will begin systematic and continuous monitoring operations regarding the newly established certificate procurement process. Monitoring operations will be improved by auditing the confirmation of operational status of the processes used in each section or in each Group Company as well as the system, etc., of the newly established Certification-related Coordination Group. By so doing, the Internal Control Supervision Department will objectively examine whether such processes are properly operating and its function to promote the due operation of the processes will be strengthened. In the future, the Internal Control Supervision Department will further improve its monitoring functions to secure the effective operation of relevant processes.

(ii) Strengthening of the Three-Line Model

The Company will strengthen the Three-Line Model to enhance the effectiveness of its corporate governance. In operating the newly established certificate procurement process, at the first line, the supervisors will ensure adequate field management by confirming the fulfillment of the necessary eligibility requirements. At the second line, the systems of the Legal & Compliance Department will be secured to further strengthen the measures to be taken in relation to the compliance issues and the risk management issues. At the third line, the Internal Control Supervision Department which performs internal audit functions will, from its independent standpoint, expand its monitoring functions to examine the steps taken at the first and second lines and to assess and audit them for improvement. Such activities are expected to strengthen the Company's ability to detect early warning signs and to effect a cure as soon as possible, both of which will contribute to improving the effectiveness of the risk management system.

4. Steps taken in relation to owners and customers

(1) Steps taken in relation to the premises in which ineligible certification holders were involved

(i) Steps taken in relation to work-in-progress premises

In accordance with instructions provided by the competent authorities, we explained the content of the investigation report prepared by the Committee to the owners or other customers of the premises in which ineligible managing engineer certification holders or ineligible defense equipment engineer certification holders were involved. The proper certification holders took over the responsibility.

(ii) Steps taken in relation to the completed premises

We identified the completed premises in which ineligible managing engineer certification holders or ineligible defense equipment engineer certification holders were involved. We then explained the content of the investigation report prepared by the Committee to the owners or other customers of the completed premises. Following that, we requested that the owners understand the necessity of confirming the quality of the premises and giving assistance to us therefor. We then investigated the premises to confirm the quality of the premises.

We have a consultation desk related to the quality, etc., of the premises from December 2025, and the contact number is stated on the Company's website.

(iii) Corrections to the registrations in the CORINS (Construction Records Information System)

Regarding the work-in-progress premises in which an ineligible managing engineer was involved, the eligible certification holder is registered in CORINS as the person in charge. We will correct the registration regarding the completed premises after we receive the owners and/or other customers' consent to the correction of the false information.

End