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September 25, 2026

TO WHOM IT MAY CONCERN:

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Progress Report on Recurrence Prevention Measures Designed to Address to Improper Procurement of Certifications

Within our report entitled “Approval of Recurrence Prevention Measures Designed to Address to Improper Procurement of Certifications; and Progress Report” dated March 26, 2026, NOHMI BOSAI LTD., (“**Company**”) made public the “Recurrence Prevention Measures” (“**RP Measures**”) which were determined based on the proposals made by the External Investigative Committee (“**External Investigative Committee**”) and the progress report.

Thereafter, under the supervision of the “Task Force for the Prevention of Recurring Cases of Improper Procurement of Certifications” (“**Task Force**”), we have consistently implemented measures such as: to strengthen our certification management system; review our compliance education programs; renovate our organizational culture; and strengthen our risk management system. In addition, we have reported to the relevant government agencies regarding the steps we have taken and we have introduced our certification-related procedures in collaboration with the relevant government agencies.

We now report as follows regarding the current status of the above measures after March 26, 2026; the results of the measures we have taken up to the present; and the remaining issues to be addressed.

We will: sustain the momentum of our past efforts; consistently examine and improve the effectiveness of the RP Measures; and steadfastly make our best efforts to recover your trust as a company that is expected to promote safety and security in society.

1. Progress of RP 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 the Company and Nohmi Group Companies were present, the Company's Chairman and Representative Director issued instructions to: fully reinforce compliance awareness; thoroughly perform the RP Measures; and enact measures to recover the public's trust. Furthermore, the Compliance Officer provided details on the incidents of the improper certification procurement and reiterated that the recurrence of such incidents will not occur. In addition, at the Nohmi Group Management Meeting held in March 2026, the Company's President and Representative Director delivered a message to emphasize the importance of steadfastly implementing the RP Measures and improving the organizational culture. It is expected that the top management personnel will continue to send their messages to facilitate the improvement of the compliance mindset as well to ensure that the incident will not recur.

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

We have taken steps to ensure that all Group Companies (including the Company) hold "workshops to encourage discussions within the workplace" with managers from each company acting facilitators to promote psychological safety and support sound decision making. We have already created related materials to be distributed to workplaces, and the managers who have completed the practical training sessions (please see the following) have already started workshops in the sections to which such managers belong. Employees within each workshop will be encouraged to engage in discussions about "barriers to voicing opinions" and "common compliance risks". These discussions are intended to establish a workplace environment and organizational culture in which each employee develops a sense of ownership, exercises sound judgement and takes appropriate action.

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

In implementing the RP Measures, we have sought to cultivate an organizational culture which prioritizes legal compliance above all else. These efforts have been incorporated into the Company's internal control system and have been systematically improved and implemented. In addition, we have assessed the effectiveness of these efforts by (i) using a Three-Line Model monitoring framework and (ii) conducting internal audits on a regular basis. The results of such assessments are reflected in the internal rules, processes and systems of the Group Companies. In addition, we are in the process of establishing a system to continuously review and improve the RP Measures. Since July 2026, within the framework of the internal audit, we have been assessing the operational status and effectiveness of the RP Measures, and we will assess all subject organizations (including the Group Companies) within this financial year. Through these activities, we will continue to improve the effectiveness of the internal control of the Group Companies, as a whole.

(2) Review of Compliance Education

(i) Raising awareness at various kinds of training sessions

At various training sessions, the Legal & Compliance Department (formerly called "CSR

Promotion Department") has, as part of its compliance education, continued raising awareness among trainees 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

Based on the results of assessment and analysis conducted by external expert institutions regarding our conventional compliance education, we have revamped our conventional knowledge acquisition-oriented educational system into a new educational system designed to enable trainees to understand the organizational factors that contributed to the improper actions as well as the structural factors under which workplace business pressure may impede sound judgment and appropriate action. Based on the above, from financial year 2026, we have already provided all managerial staff of the Group Companies (including the Company) with practice-oriented online training sessions. Within the training sessions, with a focus on organizational mechanisms as well as workplace atmosphere in addition to individual mindsets and actions, we have strived to enable the trainees to acquire the communication methods that allow them to express any sense of incongruity in an appropriate manner that they may feel in the workplace without getting excessively caught up in interpersonal concerns.

(iii) Revamp of Compliance Education Program at the Conventional Tiered Training Sessions

In relation to the compliance education designed for newly-appointed managers, we have revamped our conventional lecture-style education program into a practical education program using pre-class preparation (i.e., watching videos and comprehension check tests) and case studies based on practical examples. Based on the post-training survey and the results of the comprehension check, we have confirmed that the trainees have established their own decision-making criteria regarding compliance-related issues and they have gained an awareness of the need for behavioral changes in addition to that they have acquired related knowledge. In the future, we will utilize the insights gained through providing these training sessions in upcoming tiered training sessions for, among others, newly-appointed branch managers and Group Company presidents, through which we will seek to further enhance compliance awareness throughout the Group.

(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, with the support of an external expert organization, the Company conducted an anonymous survey of all Group Company employees to confirm the degree of organizational insularity within the Group Companies (including the Company). The survey also collected basic materials for improvement (survey response rate: 96.6%). The results of the survey are generally at a satisfactory level, and we confirmed that no critical compliance-related problems have widely emerged. On the other hand, there is room for improvement regarding the issue of “stagnation of human resources”, “opportunity for personnel reassignment” and “myriads of localized rules”, etc., and it is suggested that such issues are related to the closed nature of the organization. Survey results are internally made public within the Group Companies, and we have reflected the issues relating to organizational culture and communication in the education system and the planning of various human resources measures. In the future, we will steadfastly implement concrete measures for improvement and conduct such surveys on an ongoing basis to confirm whether such measures have taken root and the degree of their effectiveness.

(ii) To plan and examine human relations policies (“<u>HR Policies</u>”) 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, and we have established a so-called Succession Plan as of July 2026 (in other words, a plan to develop the skill sets necessary for personnel to advance to certain roles). We position these HR Policies as vital to the comprehensive reform of our operations including our organizational culture. In this regard, we are engaging in discussion aimed at expanding internal mobility and improving our organizational culture by drawing on a diverse set of knowledge and perspectives, which may include the opinions of our Outside Directors. While we will thoroughly assess the impact of such initiatives on the organization, we will implement these measures in phases (including trials) and on an ongoing basis.

(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

Under the previous system, the respective Department or Division would examine the content of the certificate application and then formally file the application. As of December 2025, however, we began working to provide a single point of contact to newly establish a certification-related coordination group (“**<u>Certification-related Coordination Group”</u>**) within the CSR Promotion Department (under the Compliance Division). Along with this, 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.

(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 established a workflow related to personnel’s procurement of certificates (i.e., centralized management for application, review, approval, and registration), which has been in effect since April 2026. The centralized management workflow includes the following processes:

1. organizing the certificate eligibility requirements (including whether work experience is required);
2. developing a certificate application process;
3. standardizing the certificate procurement process used by all Group Companies and making 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. centralize the management and control of the information required for certificate applications or examinations; and
5. centralize the management and control of data related to the certificates held by the personnel.

The above workflow has already been implemented for the management of the four categories of certificates identified by the External Investigative Committee (i.e., certificates for fire defense equipment engineers, managing engineers, construction work management engineers and registered fire extinguishing equipment skilled workers). In the future, the Company will further strengthen the certification management system by identifying and adding other categories of certificates subject to this workflow which could be associated with any future improper procurement of certificates.

(iii) Ensuring compliance with the eligibility requirements needed to take the fire defense equipment engineer certificate examination

In order to ensure that new-hires' compliance with the eligibility requirements for the fire defense equipment engineer certificate examination, we have taken steps to ensure that such new-hires do satisfy the eligibility requirements by expanding the content of their training sessions from financial year 2026. At the new-hires training sessions this year, the curriculum needed to satisfy the eligibility requirements for the fire defense equipment engineer certificate examination were provided to all new-hires (including new-hires to be assigned to corporate functions within the Group Companies), and all such new-hires have passed the required tests or earned the license required to take the fire defense equipment engineer certificate examination. These steps are intended to ensure that all new-hires satisfy the eligibility requirements for the fire defense equipment engineer certificate examination at an early stage of employment. These steps are also intended to ensure that all such new-hires satisfy the basic requirements for satisfying the eligibility requirements for the certificate examination in the future. In addition, we will also review (i) the operational procedures to confirm whether experienced hires satisfy the requirements for the fire defense equipment engineer qualification and (ii) the operational procedures to manage such matters, and we are currently in the process of determining an appropriate operational framework.

(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 are in the process of reviewing the risk management system of all Group Companies (including the Company). As part of such review, we newly established a certification-related coordination group ("**<u>Certification-related Coordination Group</u>**") within the CSR Promotion Department (under the Compliance Division) in December 2025. Such group has promoted the coordination of the system for filing certificate applications and strengthened the management of certificates held. In addition, the name of the CSR Promotion Department was renamed to Legal & Compliance Department in June 2026, and the necessary personnel were assigned to the Legal & Compliance Department, thereby further strengthening the compliance and risk management system by way of newly establishing several Groups responsible for their separate roles.

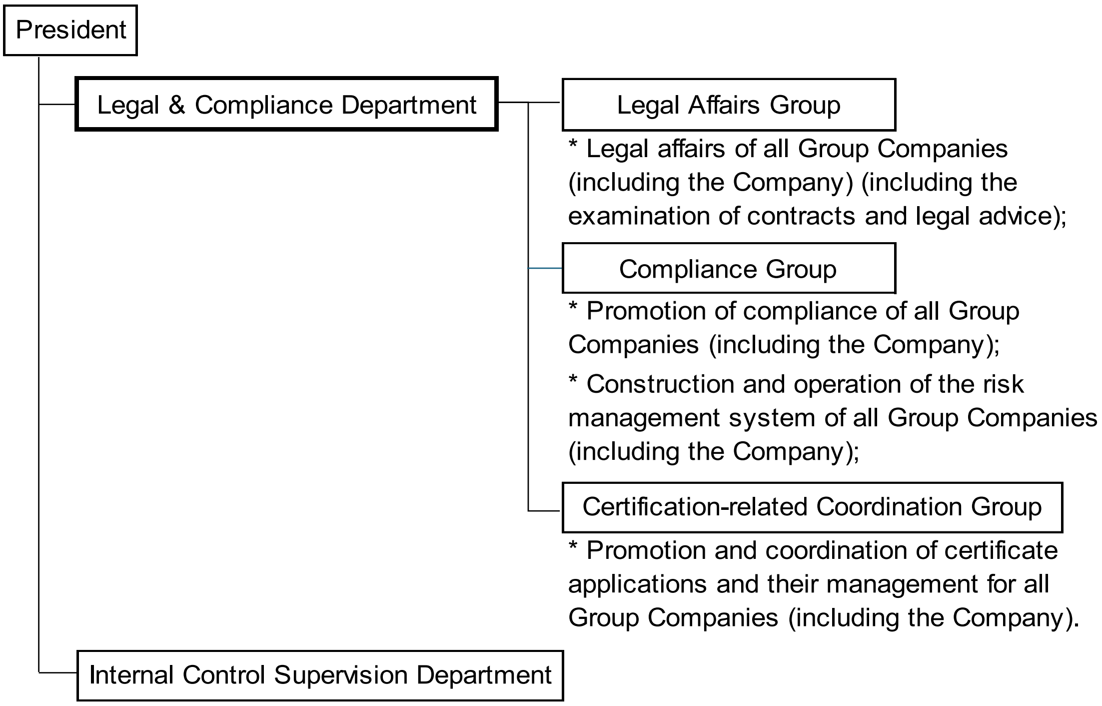
Former Organization:

- President
  - CSR Promotion Department
    - * Legal affairs of all Group Companies (including the Company) (including the examination of contracts and legal advice);
    - * Promotion of compliance of all Group Companies (including the Company);
    - * Construction and operation of the risk management system of all Group Companies (including the Company);
    - * Environment management of all Group Companies (including the Company);
    - * Corporate Social Responsibility (CSR) activities as a corporate group
    - Certification-related Coordination Group
      - Newly established in December 2025
      - * Promotion and coordination of certificate applications and their management for all Group Companies (including the Company).
  - Internal Control Supervision Department

New Organization: The "CSR Promotion Department" was renamed in June 2026.

"Legal & Compliance Department"

"CSR Promotion Department" was renamed as "Legal & Compliance Department", and several Groups with separate roles were newly established and properly staffed, in order to further strengthen the organization's ability to handle compliance and risk management issues.



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

Since July 2026, we have, with the assistance of outside consulting firms, been in the process of identifying the risks related to our operational environment or risks based on the nature of our business. In the future, we will review the structure and operation of the Risk Management Committee based on the results of these efforts, as well as the assessment and advice given by outside experts.

(iii) Strengthening and improving the Risk Management Committee structure

In June 2026, we amended the “Risk Management Regulations” and reviewed the governance of the risk management system of all Group Companies (including the Company) to clarify and strengthen the Risk Management Committee’s reporting lines and allocation of roles. The effectiveness of the risk management system will be improved by deploying a compliance leader to each section and 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 have been further strengthened, and with new individuals with expertise in various fields participating as members in the activities of the Risk Management Committee, which will further enhance the operational basis of the Risk Management Committee. The compliance leaders were sent to attend training sessions held by outside expert organizations in July 2026. Such efforts are expected to contribute to the recalibration of personnel’s sense of risk and compliance standards.

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

We are in the process of examining how to develop and deploy material certificate holders (such as managing engineers and expert engineers) within the Group Companies (including the Company), by collecting information such as the number of employees who wish to procure certificates and the required number of certificate holders in each Section or Department with the aim of contributing to the systematic development and appropriate deployment of certificate holders in each Section or Department. In the future, rather than having each Section or Department handle these matters individually, information regarding the required number of certificate holders and the number of such certificate holders deployed will be collected on an ongoing basis and discussed from the perspective of all Group Companies (including the Company) in order to establish a system to systematically develop and deploy such material certificate holders.

(6) Fundamental shift in officers' mindset

(i) Training sessions for managerial staff

In February 2026, we provided all officers, including Outside Directors, with compliance training sessions under the guidance of an external expert organization. The subject of the training sessions was "legal and corporate governance, compliance and the renovation of the organizational culture", and discussions were had 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 actual improper cases that occurred and took into account the adverse effects that compliance-related breaches against a company can have. The root causes of improper cases by other companies were also considered. Through these sessions, the officers had an opportunity to deepen their understandings of specific steps that could be taken to prevent the recurrence of such incidents and to fundamentally shift their mindset. In addition, we have provided education sessions on an ongoing basis to reform the organizational culture using the heightened sense of risk awareness among managerial staff and their leadership, including seminars conducted by external experts to newly appointed executive officers. In the future, we will provide educational training sessions on an ongoing basis to ensure that managerial staff take the lead in improving compliance awareness and reforming the organizational culture.

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

In the future, the Risk Management Committee will increase the opportunities to report to the Board of Directors and the Executive Officers Meetings so as to construct a system to regularly share major risks related to the Company and the status of measures taken to address such risks. By doing so, it is expected that officers' sensitivity to risk will improve, and a framework to understand and identify risk at an earlier stage will be established. In addition, our ability to detect early warning signs of risk will be improved by using external expertise, including cases where Outside Directors will have the opportunity to participate as observers. Furthermore, each officer will proactively engage with the risks in their respective business territory, and the officers will execute the preventive measures and countermeasures based on the discussions at the Risk Management Committee. Moreover, the officers will share information about such risks among themselves to ensure that the risks will be resolved by the Company, as a whole organization.

(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 began conducting systematic and continuous monitoring operations regarding the newly established certificate procurement process. The monitoring operations have been 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 objectively verifies whether such processes are properly operated, and its function to promote the due operation of the processes has been 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 has strengthened the Three-Line Model to enhance the effectiveness of its corporate governance. At the first line, the necessary systems and processes have been established and maintained for the operation of the certificate procurement process and for each business section to manage its own risks. At the second line, the systems of the Legal & Compliance Department have been established to enhance its function of supporting and overseeing compliance and risk management issues. At the third line, the Internal Control Supervision Department which performs internal audit functions has, from its independent standpoint, examined the steps taken at the first and second lines and assessed and audited them for improvement. Such activities are expected to facilitate our ability to detect early warning signs of risk and to effect a cure as soon as possible, both of which are intended to contribute to improving the effectiveness of the risk management system.

2. 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 External Investigative Committee to the owners or other customers of the premises in which ineligible managing engineer certification holders or ineligible fire defense equipment engineer certification holders were involved. The proper certification holders took over responsibility.

(ii) Steps taken in relation to the completed premises

Regarding the completed premises in which ineligible managing engineer certification holders or ineligible fire defense equipment engineer certification holders were involved, we gave an explanation to the owners and other customers of the completed premises. Following that, we requested that the owners and other customers confirm the quality of the premises. At present, we have already completed such steps (i.e., providing explanations and conducting investigations to confirm the facts that led up to the incident) for around eighty percent of the completed premises, and we have confirmed based on the above investigation that there is no problem with the quality of the completed premises, and we have gained an understanding from the owners and other customers regarding this issue. By the last day of March 2027, we will complete the provision of our explanation to the owners of the other completed premises and investigations to confirm the quality of the construction work.

In addition, we have a consultation desk related to the quality, etc., of the premises which has been open since December 2025. The contact number for this consultation desk is listed 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 now registered in CORINS as the person in charge in place of the ineligible certification holder previously registered. We have corrected the registered information regarding the completed premises after having explained to the owners and/or other customers about the content of corrections to the registered information and obtained their consent.

3. Future steps to be taken

The Company will ensure to operate the system and organizations described above and will verify, on an ongoing basis, that the measures were taken and that they were effective. If further improvements are required as a result of such verification, the Company will review the measures and operations and will ensure that the recurrence of such incidents is prevented and will implement the further reforms to our corporate culture. In addition, we sincerely accept the opinions that we have received from individuals and entities outside of the Company, and we will use such opinions in developing our future measures. We are scheduled to publicly release further progress of our recurrence prevention measures by Spring of 2027.

End