



株式会社ニラク・ジー・シー・ホールディングス

**NIRAKU GC HOLDINGS, INC.\***

*(Incorporated in Japan with limited liability)*

**(Stock Code: 1245)**

\* *For identification purposes only*

## **SHAREHOLDERS COMMUNICATION POLICY**

### **1. PREAMBLE**

1.1 This Policy sets out NIRAKU GC HOLDINGS, INC. (the “**Company**”) in relation to communicating with its shareholders and prospective investors.

1.2 The Company is committed to maintaining effective and timely dissemination of the Company’s information to its shareholders and the market.

1.3 This Company believes that providing regular communications to its shareholders and the market is important to ensure they have the available information reasonably required to make informed assessments of the Company’s strategy, operations and financial performance.

### **2. COMMUNICATION CHANNELS**

#### **Shareholders’ meetings**

2.1 The annual general meeting and other shareholders’ meetings of the Company are the primary forum for communication by the Company with its shareholders and for shareholder participation.

2.2 The Company encourages and supports shareholder participation in shareholders' meetings. Shareholders are encouraged to appoint proxies to attend and vote at meetings for and on their behalf if they are unable to attend such meetings.

2.3 Mechanisms for enabling shareholder participation will be reviewed on a regular basis by the board of directors of the Company (the "**Board**") to encourage the highest level of participation.

2.4 Chairman of the Board, appropriate members of the Board committees and the external auditor of the Company will attend the annual shareholders' meetings to answer questions from the shareholders.

### **Company's website**

2.5 The Company's website ([www.ngch.co.jp](http://www.ngch.co.jp)) contains information about the Company including shareholder communications.

2.6 The Company will place on its website the Company's announcements, circulars, notices of general meetings and other information in compliance with the applicable laws, rules and regulations.

### **Shareholders' enquiries**

2.7 Shareholders should direct their questions about their shareholdings to Computershare Hong Kong Investor Services Limited, the Company's share registrar, at Shops 1712-1716, 17th Floor, Hopewell Centre, 183 Queen's Road East, Wanchai, Hong Kong.

2.8 Shareholders and the public may at any time make a request for the Company's information to the extent such information is publicly available. Shareholders may direct their queries to the Company's headquarters at 1-39 Hohaccho 1-chome, Koriyama-shi, Fukushima, Japan, for the attention of the Company Secretary of the Company.

2.9 The Company will respond promptly to shareholders' queries and concerns.

### **3. REVIEW OF POLICY**

3.1 This Policy is subject to regular review by the Board and will be amended (as appropriate) from time to time.

### **4. PUBLICATION OF POLICY**

4.1 This Policy will be available on the Company's website ([www.ngch.co.jp](http://www.ngch.co.jp)) and will be published in the Company's annual report.

8 April 2015