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To whom it may concern:

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Notice of the Formulation of Measures to Prevent Recurrence

As announced in the "Notice Concerning Receipt of the Investigation Report of the Special Investigation Committee" dated today, ACCESS CO., LTD. ("the Company") has received the investigation report from the Special Investigation Committee. The Company has taken seriously the recommendations made by the Special Investigation Committee for preventing recurrence and resolved at the Board of Directors meeting held today to formulate measures to prevent recurrence.

1. Summary of the Preventive Measures

The Company takes seriously the fact that some members of the U.S. subsidiary's management (One of them also serves as a director of the Company) were involved in multiple inappropriate accounting practices in the past fiscal year's financial statements, and as part of the Company's efforts to prevent recurrence, the Company has decided to establish a recurrence prevention committee headed by an external expert to concretely implement recurrence prevention measures and to implement recurrence prevention measures based on the following policy.

(Remedy measures at the U.S. Subsidiary)

(1) Overhaul of the management structure at the U.S. subsidiary

Regarding the Directors and CFO whose involvement in the Relevant Matters of the U.S. Subsidiary has been recognized, upon clarification of management responsibility for the Relevant Matters, we will conduct an overhaul of the management structure. Specifically, the CEO and CFO of the company will be replaced, and the influence of the people involved over financial reporting will be promptly removed. For the time being, monitoring and supervision will be conducted by personnel from the Company or by external experts engaged with an obligation to report to the Company.

(2) Strengthening of administrative structure at the U.S. subsidiary

To establish an administrative structure commensurate with the current scale of the U.S. Subsidiary, new personnel in charge of legal affairs and compliance will be employed, and the staff of the administration division will be reinforced (a structure that will obtain support from external experts as necessary will be established). The authority that had previously been concentrated in the hands of the CFO will then be divided between the second-line functions of accounting/finance and legal/compliance, thereby establishing an administrative structure with mutual checks and balances.

The CFO of the U.S. Subsidiary will have a duty to report directly to the CFO of the Company, thereby increasing the effectiveness of monitoring by the Company.

(3) Mindset reform at overseas locations

At the Company's overseas locations, including the U.S. Subsidiary, to foster awareness of their positions

as members of the Group, we will undertake ongoing education, particularly regarding the importance of financial reporting.

(4) Redevelopment of internal rules governing revenue recognition

Based on the diverse forms of transactions and the actual circumstances of transactions at the U.S. Subsidiary, we will conduct another review of the internal rules governing revenue recognition and further clarify and specify the accounting practices and policies according to each transaction type. We will also thoroughly communicate these rules and the intention behind their establishment not only to the subsidiary's accounting division, but also to other relevant divisions, including sales, and conduct ongoing awareness initiatives.

(5) Rebuilding of revenue recognition workflow in light of the Relevant Matters

In light of the Relevant Matters, we will undertake a review and rebuilding of the various work processes related to revenue recognition. Specifically, in terms of strengthening the administration of transactions (including the review of due diligence items when instigating a transaction), strengthening of pre-checks of various contracts (pre-assessment of accounting risks, evaluation of the interrelationship between multiple contracts when a transaction consists of more than one agreement, clarification of authority and responsibilities for contract approval and signing, etc.), and strengthening of shipment administration (establishment of independent check systems in the engineering division, clarification of criteria for recognizing a shipment as complete, clarification of exceptions for shipment supporting documents, etc.), we will make further improvements to processes and procedures for each sales channel and thoroughly communicate them.

(6) Redevelopment of internal rules, etc. governing recognition of software assets

In light of the actual circumstances of software development at the U.S. Subsidiary, we will conduct another review of the internal rules governing recognition of software assets, further defining and specifying the internal rules regarding the scope of expenses to be recognized in asset recognition (including the timing for the start and end of recognition). We will also thoroughly communicate these rules and the intention behind their establishment not only to the subsidiary's accounting division, but also to the engineering division and other relevant divisions (including other subsidiaries of the Company that develop software), and conduct ongoing awareness initiatives.

(7) Rebuilding of software asset recognition workflow in light of the Relevant Matters

In light of the Relevant Matters, we will undertake a review and rebuilding of the various work processes related to software asset recognition. Specifically, we will build a system for improving the accuracy of work hours of engineers related to software development, and improve the manual checks by the accounting division of adjustments to work hour data. In addition, regarding the timing of recognition of software assets in particular, we will build a system of mutual checks and balances by having the accounting division approve the information reported by the engineering division.

(Remedy measures at the Company)

(1) Mindset reform in the Company and commitment of top management

We will conduct ongoing education to raise awareness of financial reporting across the entire Company. In company-wide education, we will incorporate content such as financial reporting and compliance, and in education for senior management executives in particular, we will conduct systematic, ongoing training regarding topics such as financial reporting, business ethics, and management integrity.

In advance of these initiatives, to demonstrate strong leadership for the prevention of recurrences, the Company's top management will undertake a comprehensive review of the Relevant Matters, reflect on them, and consider the way forward. On that basis, they will communicate in the form of a Message from Top

Management, conveying the need for mindset reform across the entire company, including themselves, and that top management themselves will take personal responsibility to lead such initiatives.

(2) Improvement of governance at the Company

To establish an environment conducive to open, candid, and constructive discussion in the Board of Directors while maintaining a healthy tension between the Executive Directors and Outside Directors, from the perspective of information communication in the Board of Directors in particular, we will develop a framework to ensure that important matters that have been shared and discussed in management meetings are also shared with the Board of Directors appropriately and comprehensively. We will also establish a mechanism for reporting to the Board of Directors all material risk information detected in the second and third lines of internal control described below.

(3) Strengthening of control of the U.S. subsidiary by the Company

After setting up a reporting line from the CFO of the U.S. Subsidiary to the Company, we will establish a framework for the Company's CFO to hold authority over the recruitment, evaluation, and dismissal of the U.S. Subsidiary's CFO. In addition, in the interim until control structures have been established to a certain extent at the U.S. Subsidiary, the Company's CFO, with the cooperation of an external expert, will travel to the United States each quarter for the closing of the U.S. Subsidiary's quarterly accounts and conduct direct confirmation of important transactions and contracts, accounting practices, and other relevant matters.

(4) Strengthening of the Company's administration division (2nd line)

In addition to expanding the overall resources of the Company's administrative structure, we will strengthen administration and control of overseas locations in particular. Specifically, we will establish frameworks for reporting from the business divisions and accounting and legal departments of the overseas locations to the Company and strengthen coordination between second-line functions on both sides.

Further, regarding transactions of particularly significant amounts in each quarter, in addition to the confirmation of supporting documents that the Company's accounting department has already been conducting, the relevant contracts will also be reviewed with the cooperation of the Company's legal department, and the personnel responsible for those transactions will be questioned. These functions will constitute a review that is conscious of the risks from a financial reporting perspective on both accounting and legal fronts. Regarding particularly important operational systems, such as the sales administration systems of overseas locations, the Company's administrative division will be granted the authority to inspect those systems, and we will establish a framework whereby that division may directly confirm the various types of data from those locations according to necessity.

(5) Strengthening of the Company's internal audit division (3rd line)

We will also reinforce the structures in the Company's internal audit division and strengthen the internal audits of overseas locations in particular. This division will regularly take up the issues and concerns raised by the Company's accounting division and other second-line functions and, after conducting risk assessments from financial reporting perspectives, propose internal audit plans and procedures. For the immediate future, it will also deepen its on-site audits of overseas locations with the assistance of outside experts.

2. Resignation from positions and voluntary return of executive compensation, etc.

One of directors and executive officers and one director of the U.S. subsidiary who involved in this matter resigned as of today, and they voluntarily return all their previously granted restricted stock compensation and stock-based compensation stock acquisition rights. The Company has accepted their request.

In addition, Representative Director, President and CEO of the Company has offered, to take this incident very seriously, clarify his supervisory responsibilities, and, in order to thoroughly prevent a recurrence in the future, voluntarily return all of the restricted stock compensation and stock-based compensation stock acquisition rights that he has been granted, as well as his executive compensation as follows and the Company has accepted this request:

Representative Director, President and CEO: 30% reduction in monthly compensation (for three months)