

## Corporate Governance Policy

### Introduction

We at Seiko Epson Corporation ("Epson" or "the Company" below) are committed to becoming an indispensable company that is trusted throughout the world by upholding the values stated in our Management Philosophy, creating unique customer value, and contributing to society.

#### Management Philosophy

Epson aspires to be an indispensable company, trusted throughout the world for our commitment to openness, customer satisfaction and sustainability.

We respect individuality while promoting teamwork, and are committed to delivering unique value through innovative and creative solutions.

To achieve the goals declared in the Management Philosophy, promote sustainable growth, and increase corporate value over the mid- to long-term, we shall establish a corporate governance policy as resolved by the Board of Directors, the purpose of the policy being to continuously enhance and strengthen corporate governance that realizes transparent, fair, timely, and decisive decision-making. For effective corporate governance in light of prevailing social imperatives and the operating environment, Epson will review this policy, and amend it as necessary, on an annual basis. Amendments to this policy shall require board approval, and the nature of amendments shall be announced promptly.

### Chapter 1. General Provisions

#### Article 1: Principles of Corporate Governance

- 1.1 To achieve the goals declared in the Management Philosophy, promote sustainable growth, and increase corporate value over the mid- to long-term, Epson will strive to continuously enhance and strengthen corporate governance that realizes transparent, fair, timely, and decisive decision-making.
- 1.2 Epson will adopt a company with an Audit & Supervisory Committee system to further improve the supervisory function of the Board of Directors, enhance discussions at the Board of Directors meetings, and speed up management decision-making.
- 1.3 The general principles of corporate governance at Epson are as follows:
  - (1) Respect the rights of shareholders, and secure equality.
  - (2) Keeping the interests of shareholders, customers, communities, business partners, employees and other stakeholders in mind, work in an appropriately cooperative manner with them.
  - (3) Disclose company information as appropriate and ensure transparency.
  - (4) Directors, Executive Officers, and Special Audit & Supervisory Officers (collectively referred to as "Officers" below) shall be aware of their fiduciary responsibilities and shall fulfill the roles and responsibilities expected of them.
  - (5) Epson shall engage in constructive dialogue with shareholders.

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## **Chapter 2. Securing the Rights and Equal Treatment of Shareholders**

### **Article 2: Securing Shareholder Rights and Equal Treatment**

- 2.1 Epson shall take appropriate measures to fully secure the rights of all shareholders, including minority shareholders and foreign shareholders.
- 2.2 Epson shall treat all shareholders equally in accordance with their holdings and shall give all shareholders equal access to information.

### **Article 3: General Shareholders' Meeting**

- 3.1 Epson shall set appropriate dates for general shareholders' meetings and make other arrangements to ensure that shareholders are able to properly exercise their rights.
- 3.2 Epson shall issue convening notices for general shareholders' meetings a minimum of three weeks in advance of the date the meetings are held and, moreover, shall disclose information included in the convening notice on the Epson web site, prior to sending the convening notice, in both Japanese and English, to enable shareholders to properly exercise their voting rights.
- 3.3 Epson shall facilitate the exercise of shareholder voting rights, by using an electronic voting platform and other means.
- 3.4 The Board of Directors shall analyze the results of votes on resolutions proposed by the Company at general shareholders' meetings and shall take necessary action, such as enhancing shareholder dialogue.

### **Article 4: Basic Strategy for Capital Policy**

- 4.1 Epson shall implement the necessary capital policy to optimize the structure and allocation of capital so as to minimize the cost of capital, promote sustainable growth, and increase corporate value over the mid- to long-term.
- 4.2 Epson's Board of Directors shall examine the necessity and rationale for raising capital or taking other actions that will cause significant dilution so as not to unfairly harm the existing shareholders' interests. Moreover, Epson shall provide sufficient explanation to shareholders.

### **Article 5: Policy on Cross-Shareholdings**

- 5.1 If Epson concludes that it would be conducive to increasing Epson corporate value over the mid- to long-term to maintain and strengthen stable, long-term business relationships with suppliers of critical parts and materials, key purchasers of Epson products and services, and important sources of funding or providers of other financial services, Epson shall acquire and hold shares in them after verifying their creditworthiness, stability, and so forth.
- 5.2 The Board of Directors shall examine the mid- to long-term rationale of major cross-shareholdings such as these on an annual basis, taking into consideration all risks and rewards associated with maintaining and strengthening business relationships.

### **Article 6: Standards for Exercising Voting Rights for Cross-Shareholdings**

- 6.1 Epson shall exercise its voting rights on cross-shareholdings based on what is best for promoting sustainable growth and increasing corporate value of both Epson and the share issuer over the mid- to long-term. When exercising its voting rights, Epson shall respect the business policies of the issuer.
- 6.2 When exercising its voting rights, Epson shall take into account matters such as the business environment of the issuer, and when it deems necessary, shall seek an explanation regarding proposals set forth by the issuer.

### **Article 7: Anti-Takeover Measures**

- 7.1 When introducing, updating, and implementing "Countermeasures to Large-Scale Acquisitions of Seiko Epson Shares" (anti-takeover measures), Epson shall guarantee appropriate procedures to preserve and increase Epson's corporate value and the mutual interests of the Company and its shareholders. Furthermore, Epson shall provide shareholders with a sufficient explanation.

### **Article 8: Conflicts of Interest**

- 8.1 In case of any conflicts of interest with the Company, Directors and Executive Officers must promptly report such conflicts of interest to the Board of Directors and obtain board approval.

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- 8.2 To protect the interests of the Company and its shareholders, Epson shall appropriately monitor transactions with related parties by requiring the Board of Directors approval for and reporting of transactions, except when it is clear that the terms of business are the same as those in ordinary business transactions.

### **Chapter 3. Appropriate Cooperation with Stakeholders**

#### **Article 9: Principles of Corporate Behavior**

- 9.1 Epson shall establish “Principles of Corporate Behavior” to articulate principles of conduct that Officers and employees must follow to ensure that it continues to fulfill its corporate social responsibility, the foundation on which Epson's Management Philosophy is founded, and the Board of Directors shall regularly review whether the code is being widely implemented.

#### **Article 10: Addressing Sustainability Issues**

- 10.1 Believing that our mission is to build trusting relationships with all stakeholders, advance with the communities in which we operate, and contribute to making the world a better place through business activities that create value that exceeds the expectations of customers, Epson positively and actively addresses social and environmental problems, and other sustainability-related issues.

#### **Article 11: Ensuring Workforce Diversity**

- 11.1 Epson shall declare its intent to take full advantage of the value of human diversity and to increase synergies between individuals and organizations. Further, Epson shall provide an environment and systems that allow the workforce to succeed, regardless of gender, nationality, age, race, physical abilities and disabilities, and other differences.
- 11.2 Epson, recognizing in particular that facilitating the success of women is essential for promoting sustainable growth and increasing corporate value over the mid- to long-term, shall provide an environment and systems designed to promote the active participation of women, starting with promotions to management and Officer positions.

#### **Article 12: Whistleblower Systems**

- 12.1 Epson shall provide appropriate whistleblower systems that allow whistleblowers to report illegal or inappropriate behavior, disclosures, or other serious concerns without fear of reprisal. Epson shall also provide for the objective assessment and appropriate response to the reported issues.

### **Chapter 4. Ensuring Appropriate Information Disclosure and Transparency**

#### **Article 13: Appropriate Information Disclosure**

- 13.1 Epson shall report financial and business matters fairly, in detail, and in an easy-to-understand manner in accordance with the requirements of the Japanese Companies Act, Financial Instruments and Exchange Act, stock exchange rules, and other applicable laws and regulations.
- 13.2 Epson shall also ensure the transparency of operations by voluntarily providing information beyond that which is required by law.
- 13.3 Epson shall disclose information in English, to a reasonable extent, to earn greater recognition in global capital markets.

### **Chapter 5. The Role of the Board of Directors, etc.**

#### **Article 14: The Role of the Board of Directors**

- 14.1 Given its fiduciary responsibility to shareholders, the Board of Directors is responsible for achieving efficient and effective corporate governance, through which Epson strives to fulfill its social mission, promote sustainable growth, and maximize corporate value over the mid- to long-term.

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- 14.2 To achieve the foregoing responsibilities, the Board of Directors shall use its supervisory function on general operations to ensure that these operations are fair and transparent. The Board of Directors shall also make decisions on the important business affairs of the Company, such as decisions on the formulation of management plans and business plans and decisions on investment projects that exceed a certain fixed amount of money.
- 14.3 The Board of Directors shall clearly specify in internal regulations the matters that the Board of Directors should decide.
- 14.4 The Board of Directors shall delegate responsibility for the conduct of other business affairs and decisions to the President or to other members of management, and the Board of Directors shall carry out the oversight of the performance of their duties.

**Article 15: The Role of the Audit & Supervisory Committee**

- 15.1 The Audit and & Supervisory Committee, with a mandate from shareholders, shall be responsible for independently and objectively auditing and supervising the execution of Director duties and for ensuring the sound and sustained growth of the Company.
- 15.2 The Audit & Supervisory Committee shall establish criteria for properly evaluating potential External Financial Auditors. After selecting External Financial Auditors, the Audit & Supervisory Committee shall verify whether External Financial Auditors possess the necessary independence and expertise.

**Article 16: The Role of Directors, etc.**

- 16.1 Officers who have executive duties (Executive Directors and Executive Officers) shall gather sufficient information for performing their duties in order to fulfill their fiduciary responsibilities. They must also actively express their opinions and exhaustively discuss matters.
- 16.2 Officers who do not have executive duties (Non-Executive Directors and Special Audit & Supervisory Officers) shall gather sufficient information for supervising the performance of the President and other members of the executive management team in order to fulfill their fiduciary responsibilities. They must also actively express their opinions and exhaustively discuss matters.
- 16.3 The Board of Directors and the Audit & Supervisory Committee shall take the actions necessary for External Financial Auditors to fulfill their role.
- 16.4 Epson Officers who also serve on the boards of other publicly listed companies shall keep the number to within reasonable limits.

**Article 17: The Role of the Chairman of the Board**

- 17.1 The chairman of the Board of Directors shall raise the quality of board discussions and shall run board meetings effectively and efficiently.

**Article 18: The Role of Outside Directors**

- 18.1 Epson's outside directors have the following role:
- (1) Monitoring of the management
    - 1) Monitoring of the management through involvement in the process for selecting Officers and the process for determining compensation of Officers based on management's overall performance
    - 2) Monitoring of the management through the exercise of voting rights on important business decisions made by the Board of Directors
  - (2) Advisory function for improving business efficiency
  - (3) Monitoring of conflicts of interest
    - 1) Monitoring of conflicts of interest between Epson and its Directors and Executive Officers
    - 2) Monitoring of conflicts of interest between Epson and related parties

**Article 19: Composition of the Board of Directors**

- 19.1 The Board of Directors shall have no more than 12 members, at least one-third of whom should be independent Outside Directors.
- 19.2 Epson believes that a diverse Board of Directors is useful for facilitating substantive board discussions that cover all angles. The board should be well balanced and composed of persons who combine a broad spectrum of knowledge, experience, and skill, without regard for gender, nationality, age, etc.

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**Article 20: Composition of the Audit & Supervisory Committee**

- 20.1 The Audit & Supervisory Committee shall have no more than five members.
- 20.2 Epson believes that a diverse Audit & Supervisory Committee is useful for facilitating substantive board discussions that cover all angles. The Audit & Supervisory Committee should be well balanced and composed of persons who combine a broad spectrum of knowledge, experience, and skill, without regard for gender, nationality, age, etc.
- 20.3 An Audit & Supervisory Committee Office will be set up to assist the duties of the Audit & Supervisory Committee, and the Special Audit & Supervisory Officer shall serve as the head of the office.

**Article 21: Director Nomination Committee and Director Compensation Committee**

- 21.1 Epson shall establish a Director Nomination Committee and a Director Compensation Committee as advisory bodies for the Board of Directors.
- 21.2 The Director Nomination Committee and the Director Compensation Committee shall be composed of Outside Directors who make significant contributions, to ensure transparency and objectivity. The committees shall also include the President and the Officer in charge of human resources.
- 21.3 Full-Time Audit & Supervisory Committee Members can attend meetings of the Director Nomination Committee and Director Compensation Committee as observers.

**Article 22: Policies and Procedures for Nominating Director Candidates, etc.**

- 22.1 The policies and procedures for nominating Director candidates, and for selecting Executive Officers and Special Audit & Supervisory Officers for discussion at general shareholders' meetings are as follows:
- (1) Policies
    - 1) Officers must be impartial and possess high integrity and ethical standards.
    - 2) Outside Directors must satisfy criteria concerning the independence of Outside Directors in order to guarantee their independence. The Board of Directors established "Criteria for Independence of Outside Directors", which is listed in Appendix 1.
  - (2) Procedures
    - 1) After passing a fair, transparent, and rigorous screening and reporting by the Director Nomination Committee, Executive Director candidates and Executive Officers are selected by the Board of Directors in addition to the foregoing policy and on nomination criteria, such as broadness of insight, extensiveness of experience, sense of mission, sense of responsibility, leadership, and the ability to drive change.
    - 2) The Director Nomination Committee screens Non-Executive Director candidates and Special Audit & Supervisory Officers in a fair, transparent, and rigorous screening in line with the foregoing policy and on the basis of nomination criteria, including but not limited to broadness of insight, extensiveness of experience, sense of mission, sense of responsibility, management knowledge and specialized knowledge. The Director Nomination Committee reports its opinions to the Board of Directors, which finalizes the selections. The consent of the Audit & Supervisory Committee is required for nominating Director candidates who are Audit & Supervisory Committee Members and for appointing Special Audit & Supervisory Officers

**Article 23: Policies and Procedures for Determining Compensation of Officers**

- 23.1 The basic policies regarding the officer compensation system are as follows.
- (1) Compensation for Officers who have executive duties
    - 1) Compensation shall provide incentive to improve business performance in order to increase corporate value in both the near and long terms.
    - 2) Compensation shall be sufficient to attract qualified persons both from within the Company and from outside.
    - 3) Compensation shall be commensurate with period performance so that they can demonstrate their management capabilities to the fullest during their tenure.
  - (2) Compensation for Officers who do not have executive duties
    - 1) The composition of compensation shall guarantee independence so that these Officers can suitably exert their general management supervisory function, etc.

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- 2) Compensation shall be sufficient to attract qualified persons both from within the Company and from outside.
- 23.2 Officer compensation shall consist of the following components: basic compensation, bonuses, and stock compensation.
- (1) Basic compensation  
Monetary compensation that is paid monthly in an amount decided by taking into account all factors such as the Officer's position and responsibilities
  - (2) Bonuses  
Monetary compensation that is paid once per year in an amount decided in accordance with considerations such as the levels of achievement with respect to annual operating performance targets, etc.
  - (3) Stock compensation  
Stock-based compensation system wherein Company shares are delivered using a trust scheme, based on share delivery points awarded in accordance with considerations such as the levels of achievement with respect to the mid-to long-term operating performance targets
- 23.3 The basic compensation and bonuses for Officers who have executive duties will reflect the results of performance evaluations based on criteria set according to their respective roles.
- 23.4 Given their role of fulfilling a general management supervisory function, etc., from a perspective that is independent from executive functions, Officers who do not have executive duties shall not receive performance and share price-linked bonuses and stock compensation.
- 23.5 All forms of compensation—basic compensation, bonuses, and stock compensation— shall be determined by an appropriate body, such as the General Meeting of Shareholders, the Board of Directors, and Audit & Supervisory Committee after a fair, transparent, and rigorous review by the Director Compensation Committee, which is composed of Outside Directors who make significant contributions and which issues an opinion, to ensure transparency and objectivity.

#### **Article 24: Compliance Committee**

- 24.1 Epson shall establish as an advisory body to the Board of Directors a Compliance Committee, the purpose of which is to carry out the oversight to ensure that compliance is properly promoted and enforced along the executive line.
- 24.2 The Compliance Committee shall be composed of one or more Outside Directors and one or more Audit & Supervisory Committee Members to ensure independence, transparency, and objectivity.
- 24.3 The Compliance Committee receives and discusses reports from the Officer in charge of compliance and executive line on important matters concerning Epson's compliance programs, and it reports its findings and offers opinions to the Board of Directors.
- 24.4 External Financial Auditors can attend meetings of the Compliance Committee as observers.

#### **Article 25: Development of a Successor to the President**

- 25.1 The President is responsible for developing his or her successor.
- 25.2 The Director Nomination Committee shall engage in the appropriate oversight of the successor development plan and succession plan of the President and shall offer advice as necessary to the President.
- 25.3 The Director Nomination Committee shall examine a succession plan in the event of an emergency involving the President.

#### **Article 26: Training of Officers**

- 26.1 Officers must always actively gather information regarding matters such as the Company's financial condition, compliance, and corporate governance, in order to fulfill their roles.
- 26.2 Epson shall provide, at Company expense, the necessary training opportunities to Officers and Officers candidates based on the policy below.

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- (1) **Training of Internal Directors, Full-Time Audit & Supervisory Committee Members, Executive Officers, and Special Audit & Supervisory Officers**  
Training shall be provided to new appointees so that they acquire the knowledge, including about corporate governance that they will need as officers of a publicly listed company. The Company will invite businesspeople, lawyers, and other outside professionals to provide ongoing management, compliance, and other training to these officers after they assume their posts. They shall also seek to acquire the knowledge they need to fulfill their individual roles and responsibilities, and toward that end will undergo training appropriate for their roles at outside institutions.
  - (2) **Training of Outside Directors**  
The Company will explain Epson's businesses, strategies and the like to new appointees. To enable them to deepen their understanding of Epson's businesses, strategies, and the like after they assume their posts, Epson will provide ongoing learning opportunities. Epson will, for example, have the heads of the various businesses explain their operations, take the Outside Directors on tours of Epson's various offices and sites, and support their efforts to acquire the knowledge they will need to execute their roles and responsibilities.
  - (3) **Training for Director candidates prior to becoming Directors**  
Candidates for Director will receive training regarding the roles and responsibilities of officers in a publicly listed company. They will also undergo training at external institutions and the like to acquire the knowledge and skills they will need at the executive level.

#### **Article 27: Access to Internal Information by Outside Directors and Audit & Supervisory Committee Members**

- 27.1 Outside Directors, Audit & Supervisory Committee Members, and Special Audit & Supervisory Officers of Epson can ask Executive Directors, Executive Officers, and employees for explanations or reports or can ask them to provide internal documents whenever the need arises.
- 27.2 The Audit & Supervisory Committee, Audit & Supervisory Committee Members or Special Audit & Supervisory Officers shall communicate and cooperate with Outside Directors so that Outside Directors can increase their ability to gather information without jeopardizing their independence.
- 27.3 Epson shall establish a group to be in charge of the administrative affairs of the Board of Directors. That group shall provide the necessary support to Outside Directors, such as supplementary explanations regarding items on the agenda for board meetings.

#### **Article 28: Evaluating the Effectiveness of the Board of Directors**

- 28.1 Every year, the Board of Directors shall analyze and evaluate the effectiveness of the Board of Directors as a whole and shall provide a summary report on their conclusions.

#### **Article 29: Operation of the Board of Directors**

- 29.1 The department that is responsible for the administration of the Board of Directors shall distribute materials concerning matters to be deliberated by the board to all Directors, including Outside Directors, sufficiently in advance of the meeting.
- 29.2 The department that is responsible for the administration of the Board of Directors shall set the schedule for the next fiscal year's regular meetings of the Board of Directors by the end of each fiscal year and shall provide the schedule to all Directors.

### **Chapter 6. Dialogue with Shareholders**

#### **Article 30: Dialogue with Shareholders**

- 30.1 Recognizing that partnerships with shareholders and investors that are based on a long-term view are essential for sustaining growth and increasing corporate value over the mid- to long-term, Epson established a "Policy on Constructive Dialogue with Shareholders." The policy is provided in Appendix 2.
- 30.2 When formulating management plans, Epson shall set objectives for items such as profitability and capital efficiency based on the basic strategy for capital policy set forth in Article 4. Epson shall clearly explain to shareholders the mid- to long-term strategies and actions for achieving the objectives.

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**Additional Clauses**

Article 1: Enforcement of the Corporate Governance Policy

The Corporate Governance Policy shall come into force on September 2, 2015.

The Corporate Governance Policy was amended in part and is effective as of June 28, 2016.

The Corporate Governance Policy was amended in part and is effective as of April 1, 2017.

The Corporate Governance Policy was amended in part and is effective as of April 28, 2017.



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## Criteria for Independence of Outside Directors

The Company has established the criteria below to objectively determine whether potential Outside Directors are independent.

1. A person is not independent if:
  - (1) The person considers the Company to be a major business partner<sup>1</sup>, or has served as an executive<sup>2</sup> within the past five years in an entity for which the Company is a major business partner;
  - (2) The person is a major business partner<sup>3</sup> of the Company or has served as an executive within the past five years in an entity that is a major business partner of the Company.
  - (3) The person is a business consultant, certified public accountant, or lawyer who has received a large sum of money or other forms of compensation<sup>4</sup> (other than remuneration as an officer) from the Company or has, within the past three years, performed duties equivalent to those of an executive as an employee of a corporation or group, such as a union, that has received a large sum of money or other forms of compensation from the Company;
  - (4) The person is a major shareholder<sup>5</sup> of the Company or has, within the past five years, been an executive or Audit & Supervisory Board Member of an entity that is a major shareholder of the Company;
  - (5) The person is an executive or Audit & Supervisory Board Member of an entity in which the Company is currently a major shareholder;
  - (6) The person is a major lender<sup>6</sup> to the Company or has been an executive of a major lender to the Company within the past five years;
  - (7) The person has been employed by an auditing firm that has conducted a legal accounting audit of the Company within the past five years;
  - (8) The person has been employed by a leading managing underwriter of the Company within the past five years;
  - (9) The person has received a large donation<sup>7</sup> from the Company or, within the past three years, has performed duties equivalent to those of an executive as an employee of a corporation or a group, such as a union, that has received a large donation from the Company;
  - (10) The person came from an entity that employs someone from the Company as an Outside Director; or
  - (11) A spouse or relative within the second degree of kinship of a person having the interests listed in (1) through (9) above.
2. Even if any of the foregoing criteria apply to a potential Outside Director, the Company can elect that person as an Outside Director if that person satisfies the requirements for Outside Directors set forth in the Companies Act, and the Company deems the person suitable as an Outside Director of the Company in light of his or her personality, knowledge, experience, or other qualifications upon explaining and announcing the reasons thereof.

### Notes

- 1: A person (usually a supplier) considers the Company to be a major business partner if 2% or more of its consolidated net sales (consolidated revenue) has come from the Company in any fiscal year within the past three years.
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- 2: “Executive” means an executive officer, executive director or operating officer, or an employee occupying a senior management position of department manager or higher.
  - 3: A person (usually a buyer) is a major business partner if 2% or more of the Company’s consolidated revenue has come from that partner in any fiscal year within the past three years.
  - 4: “A large sum of money or other forms of compensation” means an average annual amount for the past three years that is:
    - i) no less than 10 million yen for an individual; or
    - ii) no less than 2% of the annual revenues in any fiscal year for a group.
  - 5: “Major shareholder” means a shareholder who directly or indirectly holds 10% or more of the voting rights.
  - 6: “A major lender” means a financial institution or other major creditor that is indispensable for the Company’s financing and on which the Company depends to the extent that it is irreplaceable in any fiscal year within the past three years.
  - 7: “Large donation” means a donation whose annual average amount for the past three years exceeds either:
    - i) 10 million yen or
    - ii) 30% of the annual expense of the group, whichever is higher.

End

### **Policy on Constructive Dialogue with Shareholders**

Epson recognizes that as we work to realize sustainable growth and increase corporate value over the mid- to long-term, we need to build and reinforce a foundation for steady growth after identifying the strengths of the company and the customer value we should create.

Partnerships with shareholders and investors (collectively referred to as "shareholders" below) that are based on a long-term view are essential for achieving this, so we will promote, to a reasonable extent, constructive dialogue with shareholders on the basis of the policy below.

(1) Organization for promoting dialogue

- 1) The Director in charge of investor relations (IR) shall be responsible for overseeing and ensuring that constructive dialogue takes place.
- 2) The company shall create an IR department to support constructive dialogue with shareholders.
- 3) The IR department and other internal departments, such as the departments in charge of corporate planning, financial and general accounting, public relations, and legal affairs, shall build a tightly coordinated system for promoting constructive dialogue with shareholders by regularly exchanging information, etc.

(2) Dialogue with shareholders

- 1) The President, Director in charge of IR or the manager of the IR or legal affairs departments shall, as a general rule, be responsible for dialogue with shareholders, to a reasonable extent.
- 2) Aside from individual meeting with shareholders, they shall do the following:
  - A. Hold events to brief shareholders on items such as mid-range business plans and business strategies.
  - B. Participate in IR conferences and the like sponsored by securities companies.
  - C. Improve the information provided to shareholders through corporate web sites, convening notices for general shareholders' meetings and other shareholder bulletins and other communications.
- 3) They shall endeavor to identify the shareholder ownership structure in order to ensure the effectiveness of dialogue with shareholders.

(3) Mechanisms for relaying the views of shareholders

- 1) The IR department shall report the views of securities analysts at or after the company releases its financial results to management bodies.
- 2) The Director in charge of IR and the IR department shall also report as needed the views and concerns of other shareholders that were obtained through dialogue to the management bodies.

(4) Control of insider information

Insider information shall be properly controlled in the course of dialogue with shareholders in accordance with internal rules (the Epson Group Insider Trading Regulation) to ensure fair information disclosure.