

TSE Urgent Notice



Aug. 29, 2023
Listing Department
Tokyo Stock Exchange, Inc.

Imposition of Listing Agreement Violation Penalty

TSE has imposed a listing agreement violation penalty as follows.

*This decision is based on the results of the examination by Japan Exchange Regulation.

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| 1. | Issue Name | SANEI ARCHITECTURE PLANNING CO.,LTD. stock
(Code: 3228, Market Segment: Prime Market) |
| 2. | Listing Agreement Violation Penalty Total | JPY 10 million |
| | Provision | Securities Listing Regulations, Rule 509, Paragraph 1, Item (3)
(due to falling under a case where TSE deems that the listed company has violated the matters in the written oath and has undermined the confidence of shareholders and investors in the TSE market) |
| 3. | Reason | SANEI ARCHITECTURE PLANNING CO.,LTD. (hereinafter referred to as "the Company") disclosed a recommendation from the Tokyo Metropolitan Public Safety Commission on June 20, 2023 and an investigation report of a third-party committee on Aug. 15, 2023. |

These disclosures and other information revealed the following facts:

- The founder of the Company, who had been President and CEO, Representative Director until he resigned the position on Nov. 1, 2022 (hereinafter referred to as the "former president"), intentionally interacted with members of an organized crime group on an ongoing basis at least from Apr. 2000 to Mar. 2021.
- In examinations for initial listing of the stock of the Company on TSE (Aug. 4, 2011) and transfer to the First Section (Aug. 6, 2012), despite having submitted written oaths stating that the contents of all documents submitted to TSE were truthful, the Company submitted written confirmations under the name of the former president which contained false information to the effect that, as far as the Company was aware, no person related to the Company intentionally had any interactions with any antisocial force.

Based on the above, TSE deems that the Company has violated the matters in the written oath, and that if the above facts were revealed, it would have been enough

for TSE to determine not to approve the applications made by the Company for the above examinations. Considering this, TSE deems this violation of the written oath undermined the confidence of shareholders and investors in the TSE market. As such, TSE shall impose a listing agreement violation penalty on the Company.

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