

Attachment

● The Method for Calculating the Amount of the Administrative Monetary Penalty

1. Offender (1)

(1) Pursuant to Article 175(1)(ii) of the FIEA, the amount of the administrative monetary penalty is calculated as the value of item (i) minus item (ii) as follows:

(i) The volume of shares purchased multiplied by the highest price per share in the markets during the two weeks after the disclosure about the MNPI

(ii) The volume of shares purchased multiplied by the actual purchase price per share

a) Shares purchases made on Offender (1)'s own account

(i) $(361.9 \text{ yen} \times 31,500 \text{ shares}) -$

(ii) $\{(130 \text{ yen} \times 2,000 \text{ shares} + 131.8 \text{ yen} \times 800 \text{ shares} + 132 \text{ yen} \times 200 \text{ shares} + 134 \text{ yen} \times 1,700 \text{ shares} + 135 \text{ yen} \times 10,300 \text{ shares} + 137 \text{ yen} \times 2,000 \text{ shares} + 138 \text{ yen} \times 2,000 \text{ shares} + 139 \text{ yen} \times 3,500 \text{ shares} + 139.8 \text{ yen} \times 1,000 \text{ shares} + 140 \text{ yen} \times 2,000 \text{ shares} + 141 \text{ yen} \times 3,000 \text{ shares} + 156 \text{ yen} \times 1,000 \text{ shares} + 157 \text{ yen} \times 1,000 \text{ shares} + 158 \text{ yen} \times 1,000 \text{ shares})\}$

$= 7,039,410 \text{ yen}$

b) Shares purchased on Offender (1)'s own account and another account

(i) $(361.9 \text{ yen} \times 8,220 \text{ shares}^{*1}) -$

(ii) $\{(102 \text{ yen} \times 3,000 \text{ shares} + 105 \text{ yen} \times 3,000 \text{ shares} + 107 \text{ yen} \times 2,000 \text{ shares} + 108 \text{ yen} \times 1,000 \text{ shares} + 108.9 \text{ yen} \times 300 \text{ shares} + 109 \text{ yen} \times 700 \text{ shares} + 135 \text{ yen} \times 1,000 \text{ shares}) - 300,000\}^{*2}$

$= 2,087,848 \text{ yen}$

*1 The volume of shares purchased on Offender (1)'s own account is calculated as follows:

(a) $- ((a) \times (b) / (c))$

(a) The volume of shares purchased on Offender (1)'s account and another account: 11,000 shares

(b) The amount contributed by another person for the purchase of the shares: 300,000 yen

- (c) The amount paid for the purchase of the shares on Offender (1)'s own account and another account: 1,186,970 yen
(Any fraction less than one share is rounded down.)

*2 The amount paid for the purchase of the shares on Offender (1)'s own account is calculated as follows:

- (a) – (b)
 (a) The amount paid for the purchase of shares on the person's account and the accounts of others: 1,186,970 yen
 (b) The amount contributed by another person for the purchase of the shares: 300,000 yen

The total amount of a) and b) comes to 9,127,258 yen.

(2) Pursuant to Article 176(2) of the FIEA, the amount of the administrative monetary penalty shall be 9,120,000 yen as amounts less than ten thousand yen are rounded down.

2. Offender (2)

(1) Pursuant to Article 175-2(1)(iii) of the FIEA, the amount of the administrative monetary penalty is calculated as half the value of item (i) minus item (ii) as follows:

- (i) The volume of shares purchased multiplied by the highest price per share in the markets during the two weeks after the disclosure about the MNPI
 (ii) The volume of shares purchased multiplied by the actual purchase price per share

(i)[{361.9 yen × (31,500 shares (above 1. (1) a)) + 8,220 shares (above 1. (1) b))} -
 (ii) {(130 yen × 2,000 shares + 131.8 yen × 800 shares + 132 yen × 200 shares +
 134 yen × 1,700 shares + 135 yen × 10,300 shares + 137 yen × 2,000 shares + 138
 yen × 2,000 shares + 139 yen × 3,500 shares + 139.8 yen × 1,000 shares + 140 yen
 × 2,000 shares + 141 yen × 3,000 shares + 156 yen × 1,000 shares + 157 yen ×
 1,000 shares + 158 yen × 1,000 shares) +
 (102 yen × 3,000 shares + 105 yen × 3,000 shares + 107 yen × 2,000 shares + 108
 yen × 1,000 shares + 108.9 yen × 300 shares + 109 yen × 700 shares + 135 yen ×
 1,000 shares) – 300,000}] × 0.5

= 4,563,629 yen

(2) Pursuant to Article 176(2) of the FIEA, the amount of the administrative monetary penalty shall be 4,560,000 yen as amounts less than ten thousand yen are rounded down.