Company name: Amvis Holdings, Inc.

Name of representative: Keiichi Shibahara, Representative Director and CEO

Securities code: 7071; Tokyo Stock Exchange Prime

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# Notice on Formulation of Improvement Measures Based on the Findings of the Special Investigation Committee

As announced in our notice dated August 8, 2025, titled "Notice on Receipt of the Investigation Report from the Special Investigation Committee", we have received the investigation report from the Special Investigation Committee. We sincerely acknowledged the cause analysis and recommendations for improvement provided by the Special Investigation Committee and hereby announce the formulation of concrete improvement measures. We would like to once again express our deep apologies to the users of our facilities and their families, our shareholders and investors, and all other stakeholders for the significant inconvenience and concern caused.

#### ■Outline of Improvement Measures

In response to certain media reports suggesting that the Company may have engaged in improper medical fee claims, we established the Special Investigation Committee to accurately ascertain the facts pointed out in the reports, and to take prompt action if any issues were identified in the course of verification. As a result of the fair and objective investigation conducted by the Committee, it was recognized that there was no organizational misconduct or improper billing as suggested in some of the reports.

However, the investigation also pointed out areas in our operations that require improvement, and the Special Investigation Committee provided multiple recommendations for improvement.

We sincerely accepted the cause analysis and improvement recommendations pointed out in the investigation report and will implement initiatives for the following items to formulate effective operational improvement measures, including strengthening internal controls.

(1) Promotion of Defining and Standardizing Home-Visit Nursing Services as a Basis for Accurate Record-Keeping

Home-visit nursing services are specialized and, by their nature, difficult to strictly define. Nonetheless, we believe that clearly defining what services should be provided at Ishinkan is indispensable for the proper implementation of home-visit nursing. Defining these services also clarifies the scope of activities to be recorded, which is essential for accurate record-keeping. Furthermore, we aim to standardize the recording of services as much as possible, with the goal of documenting accurate facts.

To this end, we will define home-visit nursing services at Ishinkan, led by departments that play a guiding role in on-site operations, including the Ishinkan Operations Headquarters, Training Planning Department, and Business Support Department, and promote standardization of operations based on these definitions. We will also promote standardization of basic operational procedures, including planning and implementation of home-visit nursing care.

We have already undertaken initiatives for defining and standardizing home-visit nursing services, specifically:

- 1. Strengthening assessments of residents enables appropriate home nursing care services.
- 2. Establishing standard nursing practices through a Standard Care Manual.
- 3. Optimizing record-keeping through standardized care records.

We will further advance these initiatives to establish an operational environment that supports accurate record-keeping.

## (2) Enhancement and Strengthening of Recruitment, Staffing, and Operational Systems

To achieve appropriate staffing, we will enhance and strengthen recruitment, personnel adjustment functions, and operational systems.

For recruitment and personnel adjustment, we will strengthen coordination with facilities to enable swift and smooth recruitment activities, eliminate staffing imbalances across facilities, and support necessary staffing where required. Specifically, we will bolster staff in the Recruitment Department and Ishinkan Operations Headquarters, gather facility requests, calculate necessary staffing levels, and establish a personnel adjustment team specializing in appropriate allocation.

For operational system enhancement, we will establish specialized teams within the Ishinkan Operations Headquarters, including a Training Planning Office centered on physicians and nurses, as well as teams focused on medical safety and ICN, to promote proper on-site operations.

# (3) Rebuilding Internal Controls and Ensuring Compliance Awareness

## A. Thorough Instructions and Reporting within Operational Lines

As also mentioned in (1), while recognizing the individuality of medical services and facility operations, we will standardize operations as much as possible by establishing rules and manuals. We will also clearly define and communicate the routes and methods of instructions and reporting to all employees. The Ishinkan Operations Department and Training Planning Department will lead the formulation and dissemination of rules and manuals, while the Ishinkan Operations Headquarters will focus on clarifying and supervising instruction and reporting processes.

## B. Rebuilding the Compliance Department

To ensure that the headquarters' management departments, including the Business Support Department, can fully perform their monitoring and guidance functions, a person well-versed in receipt operations and procedures assumed the position of Director of the Business Support Department as of August 1, 2025. Going forward, under the new Director, we will review operational procedures while strengthening oversight functions of the Management Headquarters. In addition, personnel with expertise in laws and regulations related to home-visit nursing and home care will be engaged as employees or advisors.

The headquarters' management departments, including the Business Support Department, will thoroughly check on-site operations, confirm compliance with rules and manuals, and ensure that company instructions and employee reporting are implemented. In addition to visual checks of manuals, we will use IT tools such as spreadsheets to conduct comprehensive checks and refine verification tasks. If issues are identified, the headquarters' management departments will lead investigation and implementation of solutions in cooperation with the Ishinkan Operations Department and Training Planning Department, ensuring proper operations in accordance with laws and regulations. The comprehensive checks using IT tools have already begun and will be further refined.

#### C. Strengthening Internal Audit Functions

As part of the establishment of an internal audit system, an individual with extensive practical experience in internal auditing and an understanding of visiting nursing and visiting care services was appointed as the head of the Internal Audit Office on July 7, 2025. Under the new Head, we will identify risks specific to our business, introduce necessary audit methods, assess business risks, and provide recommendations to management, including the CEO.

Regarding the internal reporting system, we had multiple channels based on the content of employee reports, but we acknowledge that awareness of the system was insufficient. We will actively raise awareness about the system's purpose and how to use it.

#### (4) Improvement of Internal Communication

We recognize that promoting communication among employees beyond departmental silos is essential for smooth information sharing and exchanging opinions on operations and overall business. Therefore, we will introduce a new company-wide communication tool to promote employee interaction, facilitate information sharing related to operations, and encourage exchange of opinions on the overall business.

Ultimately, we aim to establish a corporate culture of two-way communication between the

company and employees, on-site and headquarters, and between supervisors and subordinates, thereby enhancing the effectiveness and achievement of the above improvement measures.