Basic Information Security Policy

Version I

March 16, 2018

Phone Appli, Inc.

Yosuke Ishihara, Chief Executive Officer

Information assets (information and information systems, etc.) are the sources and the most important for the Company to produce profits in the Company's business activities as stated in the following items. Furthermore, we are socially responsible for protecting our information assets from information security incidents or threats in advance.

In order to protect information assets from information security-related threats, the Company will precisely and safely handle information assets and guarantee information security according to the Customer's management strategy, so that we can meet their expectations.

- (1) Application development, sales, and maintenance
- (2) Network equipment design, building, sales and maintenance
- (3) Provision of cloud services
- (4) Communications facilities construction
- (5) Worker dispatch business, etc.
 - 1. The Company shall set the following security objectives, and surely carry out all the measures to achieve the objectives.

[Security objectives]

- To respect and observe contracts with customers, or legal or regulatory requirements.
- To prevent information security incidents from occurring.
- To protect information assets from information security-related threats.
- 2. The Company shall properly build and operate an information security management system (ISMS), strive to ensure confidentiality, integrity and availability of important information assets,

and continue to improve the effectiveness thereof_by representing the intention of the Company's management concerning the efforts toward ensuring our information security and clarifying the principal action guidelines based on such intention.

- 3. The Company shall establish Information Security Committee and Information Security Committee Chairman that are responsible for operating ISMS and organize a team to run thereof.
- 4. The Company will provide the systematic procedures and the evaluation standards concerning risk assessment so as to keep any risks related to all the information assets which we are handling within an acceptable level and take proper risk measures based on the risk assessment.
- 5. The Company shall provide regular-basis education and training programs to all employees to maintain and improve ISMS, and measure the effectiveness thereof.