Note: This document has been translated from the Japanese original for reference purposes only. In the event of any discrepancy between this translated document and the Japanese original, the original shall prevail.

October 23, 2026

Company name: Toho Zinc Co., Ltd.
Name of representative: SATO Yoshikazu, President and Representative Director
(Securities code: 5707)
Inquiries: UENO, Fumiyuki, Deputy General Manager, Corporate Planning Department; General Manager, PR & IR Department
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Notice Regarding the Recommendation by the Securities and Exchange Surveillance Commission to Issue Surcharge Payment Orders to Former Employee of Our Company

Today, the Securities and Exchange Surveillance Commission announced that it recommended that the Prime Minister and the Commissioner of the Financial Services Agency issue an order to pay surcharges against the former employee, stating that the trading of our company's shares by a former employee constitutes a violation of the Financial Instruments and Exchange Act (insider trading).

Our company has established internal information management regulations to prevent insider trading before it occurs, while continuously conducting education and awareness activities for employees. However, we sincerely regret that such an incident has occurred, and we deeply apologize for the great concern and inconvenience caused to shareholders, investors, and all parties involved.

We take this recommendation seriously, further strengthen our internal information management system, and thoroughly conduct employee education to prevent recurrence.