

December 25, 2019
Strategic Capital, Inc.
Tsuyoshi Maruki, President & CEO

To Kiichi Taira, President & CEO, Seikitokyukogyo Co.

Regarding the Investigative Report on the Asphalt Mixture Price Fixing
Cartel Case

We are contacting you regarding the “Investigative Report” prepared by your company’s Investigation Committee on December 9, 2019, and the follow up meeting we had with Director Ishida on December 23. While some of the points were already mentioned previously, we share with you our opinions and suggestions below.

Summary

1. Details on the execution of the price-fixing cartel
2. Failure to voluntarily declare to the Japan Fair Trade Commission (JFTC) following an on-site visit on a separate matter on January 2015
3. Failure to prevent the recurrence of the cartel despite preventative measures introduced April 2016
4. Failure to confirm the facts following the on-site visit regarding the matter on September 2016
5. Inadequacy of current recurrence prevention measure and our proposal to improve effectiveness

(JFTC release included for reader reference

<https://www.jftc.go.jp/en/pressreleases/yearly-2019/July/190730.html>)