

COINCHECK GROUP N.V.

STAKEHOLDER ENGAGEMENT POLICY

Effective as of May 7, 2025

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PREAMBLE

Our strategy is aimed at the creation of sustainable long-term value by the Company and its affiliated enterprise. To this end, the Board takes into account the impact the actions of the Company and its affiliated enterprise have on people and the environment and in that context weighs the relevant Stakeholder interests.

It is vital for us to develop an understanding of our Stakeholders' needs, interests and expectations. We endeavour to achieve this through an effective dialogue with our Stakeholders. We therefor interact with our Stakeholders on a regular basis through, without limitation, customer and investor meetings and calls, industry and investor conferences, customer service, employee meetings, surveys, portals and hotlines, community outreach programs, and governmental or regulatory interactions. We annually report on our Stakeholder engagement in our annual report.

This Stakeholder Engagement Policy has been established pursuant to best practice provision 1.1.5 (Dialogue with stakeholders) of the Dutch Corporate Governance Code.

1 INTRODUCTION

1.1 Status of this Stakeholder Engagement Policy

This Stakeholder Engagement Policy has been adopted by the Board. The Board is authorised to amend, revoke or deviate from this Stakeholder Engagement Policy at any time, and from time to time, at its sole discretion.

1.2 Scope of application

This Stakeholder Engagement Policy applies to the Group, however region, business unit or stakeholder specific policies on Stakeholder engagement may apply instead of, or in addition to this Stakeholder Engagement Policy.

1.3 No third-party rights

Nothing expressed or referred to in this Stakeholder Engagement Policy will be construed to give any person any legal right or claim under or with respect to this Stakeholder Engagement Policy.

1.4 Interpretation

Capitalised terms have the meaning set out in the Annex.

2 PURPOSE OF THE ENGAGEMENT

2.1 General purpose

2.1.1 Stakeholder engagement takes place to ensure that the interests of the relevant Stakeholders are considered when defining the sustainability aspects of the Company's strategy.

2.1.2 Engagement with Stakeholders may also take place for other purposes including to promote the overall performance of the Group, to increase the Group's knowledge, to build social and relationship capital and to contribute to the Group's license to operate.

2.2 Specific purpose to be formulated by the Engagement Owner

Prior to engaging with an Engagement Counterparty, the Engagement Owner shall formulate the preliminary purpose of the engagement. During the engagement, the purpose of the engagement will be reviewed and where relevant adjusted by the Engagement Owner with due consideration of views presented by the Engagement Counterparty.

3 IDENTIFICATION OF RELEVANT STAKEHOLDERS AND ENGAGEMENT COUNTERPARTIES

3.1 Stakeholder mapping

The Engagement Owner will identify relevant Stakeholders with regard to the subject of the engagement, taking into account the criteria set out in paragraph 3.2.

3.2 Attributes of Stakeholders

In identifying relevant Stakeholders, the Engagement Owner will consider, among others, the following attributes of potential Stakeholders:

- (a) **Dependency** – groups or individuals who are directly or indirectly dependent on the Group's activities, products or services and associated performance, or on whom the Group is dependent in order to operate;
- (b) **Responsibility** – groups or individuals to whom the Group has, or in the future may have, legal, commercial, operational or ethical/moral responsibilities;
- (c) **Tension** – groups or individuals who need attention from the Group with regard to financial, wider economic, social or environmental issues;

- (d) ***Influence*** – groups or individuals who may have an impact on the Group's strategic or operational decision-making; and
- (e) ***Diverse perspectives*** – groups or individuals whose different views can lead to a new understanding of the situation and the identification of opportunities for action that may not otherwise occur.

3.3 Engagement Counterparty identification

3.3.1 Following the identification of the relevant Stakeholders, the Engagement Owner will identify potential Engagement Counterparties from among the identified Stakeholders. In doing so, the Engagement Owner may consider, without limitation, the following elements:

- (a) the Stakeholder engagement risks as further described in paragraph 5;
- (b) the interests of the potential Engagement Counterparty;
- (c) the expertise of the potential Engagement Counterparty;
- (d) the level of influence of the potential Engagement Counterparty;
- (e) the reputation of the potential Engagement Counterparty;
- (f) earlier experiences with the Engagement Counterparty;
- (g) the willingness of the potential Engagement Counterparty to engage; and
- (h) the potential Engagement Counterparty's expectations of the engagement.

Those who, through regulation, custom, culture or reputation, can legitimately claim to represent any Stakeholder interests as well as the interests of the voiceless, such as future generations and the environment, may also qualify as an Engagement Counterparty. Representatives are expected to be open about how they communicate with their constituencies and how they bring in their constituents' voices.

3.4 Employee participation body as an Engagement Counterparty

If warranted and notwithstanding statutory obligations to do so, the Engagement Owner may identify employee participation bodies of the Group as an Engagement Counterparty.

4 ENGAGEMENT METHODS

4.1 Engagement Method

The Engagement Owner shall determine the method(s) of engaging with the Engagement Counterparty that are best suited to the purpose of the engagement and to the Engagement Counterparty. The engagement methods may include, without limitation: written correspondence, one-on-one interviews, roundtables and expert meetings, customer and investor meetings and calls, industry and investor conferences, customer service, employee meetings, portals and hotlines, community outreach programs, and governmental and regulatory interactions.

4.2 Company representative

The Engagement Owner shall determine the person(s) representing the Group during a specific engagement with Stakeholders, taking into account their expertise, background, seniority and authority to take decisions.

5 ENGAGEMENT RISKS

- 5.1.1 The Engagement Owner shall assess potential risks associated with the engagement, prior to selecting the Engagement Counterparty, and the scope and method of the engagement.
- 5.1.2 Based on such assessment, the Engagement Owner will determine whether the engagement is in the interest of the Company and its affiliated enterprise. If it is not, the engagement will not be entered into.
- 5.1.3 Potential Engagement Counterparty related risks may include, without limitation, participation fatigue, having expectations that the Group is unwilling or unable to fulfil, lack of trust, unwillingness to engage, conflicting interests between Engagement Counterparties and technical or other practical barriers.¹
- 5.1.4 Group related risks may include, without limitation, damage to reputation, waste of time and financial resources, loss of control of issues, creation of conflicts of interest, raising expectations that the Group is unwilling or unable to fulfil, and non-compliance with legal requirements and internal policies and standards.

¹ In some cases, a potential Engagement Counterparty may lack the capacity (e.g. financial resources, time, language skills, cultural understanding or awareness of issues) to engage effectively. If engagement with such party is critical for the Group, the Engagement Owner may consider ways of facilitating engagement with such party as Engagement Counterparty.

- 5.1.5 The Engagement Owner may terminate an ongoing engagement, if it determines that termination is in the best interest of the Company and its affiliated enterprise.

6 ENGAGEMENT COUNTERPARTY INVITATION

6.1 Content of the invitation

- 6.1.1 The Engagement Owner shall invite the Engagement Counterparty to engage. Such invitation will typically specify:

- (a) the proposed purpose and the scope of the engagement;
- (b) which Stakeholder(s) the Engagement Owner considers to be represented by the Engagement Counterparty;
- (c) the engagement method, in conformity with paragraph 4;
- (d) what the Engagement Counterparty is expected to contribute to the dialogue with the Company;
- (e) the benefits to the engagement for the Engagement Counterparty; and
- (f) logistical and practical information about the engagement with the Engagement Counterparty.

6.2 Request for an invitation

Individuals, groups and organisations who would like to engage with the Group as Engagement Counterparty can contact the Group. In addition to other channels that may be available to such individuals, groups or organisations the Group can be reached at coincheckir@icrinc.com.

7 ONGOING MONITORING

The Board shall monitor and evaluate the overall quality of the engagement, and the Engagement Owner shall evaluate the quality of individual engagements.

8 DISCLOSURE OF INFORMATION

- 8.1.1 To ensure an effective engagement and in order to assure that the Engagement Counterparty receives sufficient, consistent and timely information, the Engagement Owner shall disclose information in an accurate, transparent and comprehensive manner. The Engagement Counterparty shall be requested to adhere to the same principles with regard to the disclosure of information to the Engagement Owner.

- 8.1.2 Disclosure of information by the Engagement Owner shall at all times be in compliance with legal requirements and internal policies and standards.
- 8.1.3 The Engagement Owner shall not disclose inside information, commercially sensitive information or information that is confidential for other reasons to the Engagement Counterparty.

9 DOCUMENTING AND PUBLIC REPORTING

9.1 Documenting of engagement outputs

- 9.1.1 The Engagement Owner shall document the engagement and its outputs and where appropriate develop an action plan that articulates how the Group will respond to the outputs of the engagement.
- 9.1.2 If considered appropriate by the Engagement Owner, the Engagement Owner may communicate the key elements of the report and action plan to the Engagement Counterparty.

9.2 Public reporting on Stakeholder engagements

- 9.2.1 The Company may publicly report on its engagements to give insight into the scope and breadth of the outreach, and to demonstrate how the engagements contributed value to the Group's strategy and operations, all subject to the reporting framework applicable to the Company.

9.3 Reporting on the engagement by the Engagement Counterparty

As a condition to entering into the engagement process, the Engagement Owner may request the Engagement Counterparty to commit that such Engagement Counterparty shall not publicly report on the engagement without the prior written consent of the Engagement Owner.

10 SHAREHOLDER ENGAGEMENT

- 10.1.1 Bilateral meetings with the Company's stakeholders may (but are not required to) take place at any time during the year, except during closed periods in the sense of and in accordance with applicable laws and regulations.

If a shareholder of the Company engages with the Engagement Owner, the shareholder shall disclose his full share position (long and short and through derivatives) at the request of the Engagement Owner and in accordance with the Company's Policy on Bilateral Contacts with Shareholders.

ANNEX

Definitions

"Board" means the board of directors of the Company;

"Company" means Coincheck Group N.V.;

"Engagement Owner" means the Board or such other representative designated by or on behalf of the Board that is conducting or initiating the engagement process on behalf of the Company, another Group Company or the Group as a whole;

"Engagement Counterparty" means the counterparty of the Engagement Owner in the engagement;

"Group" means the Company and the Group Company's;

"Group Company" means a Company's group company as referred to in article 2:24b of the Dutch Civil Code;

"Stakeholders" means those groups and individuals that, directly or indirectly, influence – or are or can be influenced by – the attainment of the Group's objectives;

"Stakeholder Engagement Policy" means this stakeholder engagement policy.