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Matters Excluded from Paper-Based Documents Delivered to Shareholders

100th Fiscal Year (April 1, 2023 - March 31, 2024)

- (i) Notes to the Consolidated Financial Statements
- (ii) Notes to the Non-consolidated Financial Statements

Mitsubishi Steel Mfg. Co., Ltd.

Pursuant to the provisions of laws and regulations and Article 14 of the Articles of Incorporation, among the matters for which measures for providing information in electronic format are to be taken, matters not provided in the paper-based documents delivered to shareholders are posted in this information.

Notes to the Consolidated Financial Statements

(April 1, 2023 - March 31, 2024)

(Notes on Significant Information Regarding the Preparation of Consolidated Financial Statements)

1. Scope of consolidation

- (1) Number of consolidated subsidiaries: 18
Names of major consolidated subsidiaries: MSSC CANADA INC.
MSSC US INC.
MSSC Ahle GmbH
MSM NINGBO SPRING CO., LTD.
MSM Philippines Mfg. INC.
MSM SPRING INDIA PVT. LTD.
MSSC MFG MEXICANA, S.A. DE C.V.
MSM (THAILAND) CO., LTD.
PT. JATIM TAMAN STEEL MFG.
Mitsubishi Steel Muroran Inc.
Mitsubishi Nagasaki Machinery Mfg. Co., Ltd.
Ryokoh Express Co., Ltd.

2. Application of the equity method

- (1) Number of affiliates accounted for under the equity method: 3
Name of affiliates accounted for under the equity method:
Hokkai Iron & Coke Corporation
CROFT PROPERTIES HOLDINGS, INC.
Stumpp Schuele & Somappa Auto Suspension Systems Pvt. Ltd.

(2) Affiliate not accounted for under the equity method:

Name of major affiliate: Dai-ichi Heat Muroran Co., Ltd.

Companies not accounted for under the equity method are excluded from the scope of application of the equity method as their impact on net income (amount corresponding to interests), retained earnings (amount corresponding to interests), etc. is not only minuscule individually but is also insignificant as a whole.

3. Matters for the fiscal year for consolidated subsidiaries

Shown below are consolidated subsidiaries with a balance sheet date other than the balance sheet date for the Company's consolidated accounts (March 31 of each year):

| | Closing date |
|--------------------------------------|--------------|
| PT. JATIM TAMAN STEEL MFG. | December 31 |
| MSSC MFG MEXICANA, S.A. DE C.V. | December 31 |
| MSM NINGBO SPRING CO., LTD. | December 31 |
| Shanghai Ryoutan Machinery Co., Ltd. | December 31 |
| MSSC Ahle GmbH | December 31 |
| MSM (THAILAND) CO., LTD. | February 29 |

In preparing consolidated financial statements, the Company uses data as of the subsidiary's closing date, and makes the necessary adjustments to reflect important transactions that occurred between the subsidiary's closing date and the consolidation date.

4. Accounting policies

(1) Valuation standards and methods of principal assets

(i) Securities

Available-for-sale securities

Those other than stocks, etc. for which market prices are not available:

The present market value is recorded based on the market prices, etc., on the last day of the period. (Valuation differences are incorporated into net assets in full. Selling prices were computed based on the moving-average method.)

Stocks, etc. for which market prices are not available:

Stated at cost mainly using the moving-average method.

(ii) Derivatives:

Market value method

(iii) Inventories:

Stated at cost based mainly on the periodic average method (method in which book values are lowered based on declines in profitability).

(2) Depreciation and amortization methods of principal depreciable assets

(i) Property, plant and equipment (excluding leased assets):

The Company depreciates property, plant and equipment (excluding leased assets) using mainly the declining-balance method.

The range of useful lives of main property, plant and equipment is as follows:

Buildings and structures

8 - 33 years

Machinery, equipment and vehicles

4 - 14 years

(ii) Intangible assets (excluding leased assets):

The Company amortizes intangible assets (excluding

leased assets) using the straight-line method.

The range of useful lives and the amortization period of main intangible assets are as follows:

Software (in-house use) 5 years

(iii) Leased assets (including right-of-use assets):

Leased assets associated with finance leases in which ownership of the leased assets is not transferred to the lessee.

The straight-line method is used assuming the lease period equals the estimated useful life and the residual value at the end of the lease term is nil.

The financial statements of overseas consolidated subsidiaries were prepared in accordance with International Financial Reporting Standards (“IFRS”) and U.S. Generally Accepted Accounting Principles (“GAAP”). International Financial Reporting Standard 16 Leases (“IFRS 16”) and U.S. Accounting Standard Update (ASU) 2016-02 Leases (“ASU 2016-02”) were applied to the subsidiaries.

Under IFRS 16 and ASU 2016-02, any lease for a lessee is recorded under assets or liabilities on the balance sheet as a general rule. The straight-line method is used for amortizing right-of-use assets recorded under assets.

In addition, in “(Lease transactions)”, lease transactions under IFRS 16 and ASU 2016-02 are classified into finance leases in which ownership of the leased assets is not transferred to the lessee.

(3) Accounting standards for principal provisions and allowances

(i) Allowance for doubtful accounts:

In order to provide for potential credit losses due to accounts receivable being difficult to collect, loans receivable, etc., allowances of the estimated unrecoverable amounts are reported based on historical loan loss rates for general claims, and on an individual basis for specific receivables including doubtful receivables.

(ii) Provision for directors' retirement benefits:

With respect to some consolidated subsidiaries, in order to provide for the payment of retirement benefits for directors, an allowance in the amount to be paid at the end of the fiscal year is reported as required by internal rules.

(iii) Provision for loss on business liquidation:

Expected amount at the end of the current consolidated fiscal year is recorded in order to prepare for the benefits paid to employees who have been employed for a certain period which will arise in the future due to restructuring of a production system in the North America consolidated subsidiary.

(4) Other significant information for the preparation of Consolidated Financial Statements

(i) Hedge accounting method:

Deferral hedge accounting is used. In addition, special treatment is applied to interest rate swap contracts that meet the requirements for special treatment.

(ii) Accounting method for retirement benefits:

In order to provide for the payment of employee retirement benefits, the Company reports the amount of the retirement benefit obligations less pension assets at the end of the consolidated fiscal year under review as net defined benefit liability (or net defined benefit asset if the amount of pension assets exceeds the amount of retirement benefit obligations).

In the calculation of retirement benefit obligations, the benefit formula has been used to attribute expected benefits to periods until the end of the consolidated fiscal year under review.

Prior service costs are expensed using the straight-line method based on a certain number of years (mainly 12 years) within the average remaining service years of the employees when incurred in each fiscal year.

Actuarial differences are expensed from the following fiscal year as incurred using the straight-line method based on a certain number of years (mainly 12 years) within the average remaining services years of the employees when incurred in each fiscal year.

Unrecognized actuarial differences and unrecognized prior service costs have been recorded under remeasurements of defined benefit plans under accumulated other comprehensive income in net assets upon adjustment of tax effects.

In some of the Company's subsidiaries in North America, non-pension post-retirement health benefits are treated similarly to retirement benefits, i.e. their total amounts are estimated and allocated on the basis of the employee's years of service, and due to their similar nature to retirement benefits, have been included in net defined benefit liability.

(iii) Recording standards of revenue related to sales of products:

We and our consolidated subsidiaries manufacture and sell specialty steel, springs, fabricated materials, etc., and with respect to sales of such products, we have performance obligations to deliver products, etc., based on sales agreements with customers.

We determine that the performance obligations are fulfilled at the time the customer obtains control over such products and we recognize the revenue of such products.

For domestic sales, revenue is recognized at the time of shipment because the period from the time of shipment

until control of the product is transferred to the customer is normal.

For export sales, revenue is recognized in accordance with the export terms as the timing of when the customer obtains control varies depending on the export terms.

Revenue is measured by deducting discounts, rebates, returns, etc. from the consideration promised under contracts with customers.

(iv) Recording standards of revenue related to construction contract:

The Machinery Business has performance obligations to deliver products, etc., based on sales agreements with customers for construction contracts.

We estimate the progress of the fulfillment of performance obligations for each contract and recognizes revenue based on the progress.

(Significant accounting estimates)

1. Asset impairment for the springs business of MSSC Ahle GmbH.

(1) Outline of the business

MSSC Ahle GmbH (hereinafter referred to as “Ahle”) is a Germany base for the spring business which manufactures and sells automotive springs, and mainly owns spring production facilities.

(2) The values of the assets as recorded in consolidated financial statements

| | |
|-------------------------------------|----------------|
| Buildings and structures | ¥458 million |
| Machinery, equipment and vehicles | ¥269 million |
| Land | ¥246 million |
| Other property, plant and equipment | ¥16 million |
| Other intangible assets | ¥3 million |
| Impairment loss | ¥1,069 million |

(3) Information on significant accounting estimates for items identified

(i) Conclusion about impairment in the business

Ahle's assets are reviewed for impairment in accordance with International Financial Reporting Standards (“IFRS”) adopted by Ahle, and as our group makes grouping on the smallest unit that generates a cash flow with a basic unit of business and base adopted for internal management purposes, Ahle, which operates a spring business in Germany, is classified as one asset group.

Ahle's operating loss continued due to surging costs including raw material and energy prices, the delay of the application of the revision of sales prices reflecting soaring costs, etc., and the decline in sales volume due to stagnant demand.

Ahle has continued to record operating losses in the current consolidated fiscal year, and prospects for a recovery in order volume are uncertain, so we identified indicators of impairment.

The recoverable value of Ahle's spring production facilities and the asset group's book value as compared showed the former to be lower than the latter, so management concluded it was necessary to record impairment loss.

(ii) Estimation of the recoverable value for the assets

Recoverable value is calculated as the higher of the value in use and fair value less costs of disposal. At the impairment test at the end of the fiscal year, since fair value less costs of disposal computed based on the appraisal value, etc., is lower than book value, impairment loss was recorded.

For value in use, discounted future cash flow was estimated on the basis of the business plan. The business plan was created in total consideration of external information such as on the operating environment, internal information, volume of sales on orders and sales prices, etc., and by using assumptions involved based on the Company's latest sales plans.

The estimate may be affected by the uncertain fluctuation of economic conditions in the future. If revision of assumptions and preconditions used for the estimate is required, the Company would potentially record new impairment loss in the following consolidated fiscal year.

2. Asset impairment for the springs business of MSM NINGBO SPRING CO., LTD.

(1) Outline of the business

MSM NINGBO SPRING CO., LTD. (MSM NINGBO) is a China base for the spring business which manufactures and sells automotive springs, construction machinery springs, stabilizers and assemblies thereof, and mainly owns spring manufacturing facilities.

(2) The values of the assets as recorded in consolidated financial statements

| | |
|-------------------------------------|--------------|
| Buildings and structures | ¥607 million |
| Machinery, equipment and vehicles | ¥69 million |
| Other property, plant and equipment | ¥23 million |
| Other intangible assets | ¥2 million |
| Impairment loss | ¥246 million |

(3) Information on significant accounting estimates for items identified

(i) Conclusion about impairment in the business

MSM NINGBO's assets are reviewed for impairment in accordance with International Financial Reporting Standards ("IFRS") adopted by MSM NINGBO, and as our group makes grouping on the smallest unit that generates a cash flow with a basic unit of business and base adopted for internal management purposes, MSM NINGBO classifies automotive springs, construction machinery springs, stabilizers and assemblies thereof as separate asset groups.

The demand for stabilizers and assemblies thereof is decreasing in sales due to a decrease in demand caused by the impact of customers' declined market share in China. MSM NINGBO continued to record operating losses in the current consolidated fiscal year, and the indicators of impairment were identified.

The recoverable value of MSM NINGBO's production facilities of stabilizers and assemblies thereof and the asset group's book value as compared showed the former to be lower than the latter, so management concluded it was necessary to record impairment loss.

(ii) Estimation of the recoverable value for the assets

Recoverable value is calculated as the higher of the value in use and fair value less costs of disposal. At the impairment test at the end of the fiscal year, since fair value less costs of disposal computed based on the appraisal value, etc., is lower than book value, impairment loss was recorded.

For value in use, discounted future cash flow was estimated on the basis of the business

plan. The business plan was created in total consideration of external information such as on the operating environment, internal information, volume of sales on orders and sales prices, etc., and by using assumptions involved based on the Company's latest sales plans.

The estimate may be affected by the uncertain fluctuation of economic conditions in the future. If revision of assumptions and preconditions used for the estimate is required, the Company would potentially record new impairment loss in the following consolidated fiscal year.

(Notes concerning the correction of errors)

1. Details of errors

As the Company announced in "Notice on the submission of report on the correction of financial statements of a past fiscal year (correction of financial results of a past fiscal year)" dated August 8, 2023, we found that remeasurements of defined benefit plans were overstated by error and associated Income taxes – deferred and foreign currency translation adjustment were understated for the fiscal year ended March 31, 2018.

Therefore, we corrected the amount of net assets at the beginning of the current consolidated fiscal year.

2. Impact on the amount of net assets at the beginning of the current consolidated fiscal year

The effect of the correction of the past errors on retained earnings, foreign currency translation adjustment and remeasurements of defined benefit plans at the beginning of the current consolidated fiscal year are an increase by ¥850 million, increase by ¥301 million, and decrease by ¥870 million, respectively.

(Notes to the Consolidated Balance Sheet)

1. Outstanding balance of receivables arising from contracts with customers and the outstanding balance of contractual assets

| | |
|-----------------------------|-----------------|
| Notes receivable – trade | 232 million yen |
| Accounts receivable – trade | 29,478 |
| Contract assets | 14 |

2. Assets pledged as collateral and secured liabilities

Assets pledged as collateral

| | |
|------|-----------------|
| Land | 216 million yen |
|------|-----------------|

Secured liabilities

| | |
|--------------------------|----------------|
| Short-term loans payable | 25 million yen |
|--------------------------|----------------|

| | |
|-------------------------|----|
| Long-term loans payable | 12 |
|-------------------------|----|

| | |
|-------|----|
| Total | 38 |
|-------|----|

The maximum amount of the revolving mortgage related to the assets above is 216 million yen.

3. Accumulated depreciation of property, plant and equipment:

96,092 million yen

(Notes to the Consolidated Statement of Income)

1. Amount of balance sheet value reduction due to the declining profitability of inventories held for ordinary sales purposes

Cost of sales 117 million yen

2. Impairment loss

The Group recorded an impairment loss on the following assets.

| (Millions of yen) | | | |
|--------------------------------|----------|-------------------------------------|--------|
| Use | Location | Category | Amount |
| Spring manufacturing equipment | Germany | Machinery, equipment and vehicles | 1,025 |
| Spring manufacturing equipment | Germany | Other property, plant and equipment | 30 |
| Spring manufacturing equipment | Germany | Other intangible assets | 12 |
| Spring manufacturing equipment | China | Machinery, equipment and vehicles | 245 |
| Spring manufacturing equipment | China | Other property, plant and equipment | 1 |

(Background to recognition of impairment loss)

With regard to these assets, the fair value after deducting the disposal cost are set as the recoverable amount, and as the carrying amount exceeds the recoverable amount, the carrying amount is written down to the recoverable amount and recorded as an impairment loss under extraordinary loss.

(Method for grouping assets)

As a general rule, businesses and operation sites used in internal control are the basic units for grouping.

3. Gain on sales of investment securities

This was attributable to the fact that the Company sold five stocks in Japan, among investment securities held by the Company.

4. Insurance claim income

This was insurance claim income from fire accidents incurred by MSSC Ahle GmbH.

(Notes to the Consolidated Statement of Changes in Equity)

1. Type and total number of shares outstanding at end of consolidated fiscal year under review:
Common shares 15,709,968 shares

2. Dividends

- (1) Dividend payments

| Date of resolution | Total dividends | Cash dividends per share | Record date | Effective date |
|--|-------------------------|--------------------------|--------------------|------------------|
| Ordinary General Meeting of Shareholders held on June 28, 2023 | 617 million yen (*1) | 40 yen | March 31, 2023 | June 29, 2023 |
| Board of Directors Meeting held on November 8, 2023 | 385 million yen (*2) | 25 yen | September 30, 2023 | December 8, 2023 |

*1 The total amount of dividends included 3 million yen representing dividends on Company shares held by the Board Incentive Plan (BIP) Trust.

*2 The total amount of dividends included 5 million yen representing dividends on Company shares held by the Board Incentive Plan (BIP) Trust.

- (2) Dividends whose record date is in the current fiscal year and whose effective date is in the following fiscal year

| Date of resolution | Total dividends | Cash dividends per share | Record date | Effective date |
|--|-------------------------|--------------------------|----------------|----------------|
| Ordinary General Meeting of Shareholders to be held on June 21, 2024 | 540 million yen (*1) | 35 yen | March 31, 2024 | June 24, 2024 |

* The total amount of dividends included 7 million yen representing dividends on Company shares held by the Board Incentive Plan (BIP) Trust.
The source of dividends shall be retained earnings.

(Notes on Financial Instruments)

1. Information regarding status of financial instruments

The Group limits its fund management activities to short-term deposits, etc., and raises funds by borrowings from financial institutions such as banks.

The Group seeks to reduce credit risks of customers concerning notes and accounts receivable-trade in accordance with the Credit Management Rules.

Investment securities mainly consist of shares, and the market prices of listed shares are identified on a quarterly basis.

Borrowings are used for operating funds (mainly short term) and capital investment funds (long term). With respect to the risk of interest rate fluctuations for some long-term loans payable, the Group performs interest rate swap transactions to fix interest expenses.

Derivative transactions are forward exchange contracts aimed at hedging exchange rate fluctuation risks involved with monetary receivables and payables denominated in foreign currencies, which are performed in accordance with the Accounting Rules.

2. Information regarding market value, etc. of financial instruments

The Consolidated Balance Sheet amount and market value at the end of the consolidated fiscal year under review and the difference between the two are as follows.

Stocks, etc. for which market prices are not available (4,288 million yen recorded on the consolidated balance sheet) are not included in the table below.

In addition, the notes to cash are omitted, and since market values of deposits, notes receivable-trade and accounts receivable-trade, notes payable-trade and accounts payable-trade, and short-term loans payable are close to their carrying amounts because these are settled in short-term, notes are omitted.

(Millions of yen)

| | Consolidated Balance Sheet amount (*1) | Market value (*1) | Difference |
|---|--|----------------------|------------|
| (1) Investment securities Available-for-sale securities: | 1,626 | 1,626 | - |
| (2) Long-term loans payable | (45,790) | (45,690) | (100) |
| (3) Derivative transactions (*2) | (10) | (10) | - |

(*1) Those recorded in Liabilities are shown in parentheses ().

(*2) Amounts of claims and obligations that accrued from derivative transactions are shown on a net basis, and net obligations are shown in parentheses ().

3. Matters concerning breakdown, etc. of market value of financial instruments by level

The fair value of financial instruments is categorized into the following three levels, depending on the observability and significance of the inputs used in calculating fair value.

Level 1 fair value --- Fair value calculated by quoted prices (unadjusted) in active markets for identical assets or liabilities

Level 2 fair value --- Fair value calculated using direct or indirect observable inputs other than Level 1 inputs

Level 3 fair value --- Fair value calculated using significant unobservable inputs

If multiple inputs are used that have a significant impact on the calculation of fair value, among

the levels in which each of such input belongs, we categorize fair value into the level in which the priority in calculating fair value is the lowest.

(1) Financial assets and financial liabilities whose fair value is recorded on consolidated balance sheets

(Millions of yen)

| Account | Market value | | | |
|---|--------------|---------|---------|-------|
| | Level 1 | Level 2 | Level 3 | Total |
| (i) Investment securities Available-for-sale securities: | 1,626 | - | - | 1,626 |
| Total Assets | 1,626 | - | - | 1,626 |
| (ii) Derivative transactions Currency-related transactions | - | (10) | - | (10) |
| Total Liabilities | - | (10) | - | (10) |

(2) Financial assets and financial liabilities for which fair value is not recorded on consolidated balance sheets

(Millions of yen)

| Account | Market value | | | |
|-------------------------------|--------------|----------|---------|----------|
| | Level 1 | Level 2 | Level 3 | Total |
| (iii) Long-term loans payable | - | (45,690) | - | (45,690) |
| Total Liabilities | - | (45,690) | - | (45,690) |

(i) Investment securities

Listed stocks are valued using quoted prices.

Since listed stocks are traded in active markets, their fair values are classified as Level 1 fair value.

(ii) Derivative transactions

Fair values of currency swaps and exchange reservations are based on the fair values presented by financial institutions with which we do business, and are classified as Level 2 fair value.

(iii) Long-term loans payable (including current portion of long-term loans payable)

The calculation method of the market value of long-term loans payable involves discounting the sum of the principal and interest divided into certain periods by the interest rate that is expected to be applied if a similar new loan is taken out.

Long-term borrowings with variable interest rates are subject to special treatment of interest rate swaps, and we use the calculation method in which the aggregate amount of principal and interest processed together with the swap as one transaction is discounted at the rate reasonably estimated to be applied if similar borrowings are made, and the market value is classified as Level 2 fair value.

(Notes on Revenue Recognition)

1. Breakdown information of revenue resulting from contracts with customers

(Millions of yen)

| Area | Reportable Segment | | | | | Other | Total |
|---------------------------------------|-----------------------------|------------------|---------------------------------------|--------------------|---------|-------|---------|
| | Special Steel Bars Business | Springs Business | Formed & Fabricated Products Business | Machinery Business | Total | | |
| Sales | | | | | | | |
| Japan | 57,596 | 24,486 | 4,299 | 8,716 | 95,098 | 1,505 | 96,604 |
| North America | 216 | 32,052 | 376 | 235 | 32,879 | - | 32,879 |
| Asia | 21,154 | 9,385 | 3,516 | 247 | 34,303 | - | 34,303 |
| Europe | - | 4,575 | 1,024 | 500 | 6,100 | - | 6,100 |
| Other | 3 | 40 | 12 | - | 56 | - | 56 |
| Revenue from contracts with customers | 78,969 | 70,540 | 9,228 | 9,700 | 168,438 | 1,505 | 169,943 |
| Sales to external customers | 78,969 | 70,540 | 9,228 | 9,700 | 168,438 | 1,505 | 169,943 |

(Note) “Others” category is a business segment that is not included in reportable segments and includes distribution and service businesses, etc.

2. Information that is the basis for understanding revenue from contracts with customers

As described in “Recording standards of revenue related to sales of products” and “Recording standards of revenue related to construction contract” in “Accounting Policies”.

3. Information to understand revenues arising from contracts with customers for the current and subsequent fiscal years

(1) Balance of contract assets and contract liabilities, etc.

The breakdown of contract assets and contract liabilities is as follows.

(Millions of yen)

| | The beginning of the fiscal year under review | The end of the fiscal year under review |
|---|---|---|
| Receivables arising from contracts with customers | 36,760 | 33,950 |
| Contract assets | 659 | 14 |
| Contract liabilities | 1,300 | 246 |

Contract assets consist primarily of unbilled balances for revenues recognized based on the

measurement of progress in the Machinery Business.

As to contract liabilities, we primarily recognize the portion for which we received consideration from the customer but for which we have not fulfilled performance obligations.

These will be reduced as the performance obligations are fulfilled.

Among the revenue recognized for the current consolidated fiscal year, the amount included in the contract liability balance at the beginning of the year is 1,300 million yen.

(2) Amount of transactions allocated to outstanding performance obligations

(Millions of yen)

| | The end of the fiscal year under review |
|-----------------|---|
| Within one year | 1,975 |
| Over one year | 2,036 |
| Total | 4,012 |

Consolidated subsidiaries apply the practical method for notes to the transaction prices for which the outstanding performance obligations are allocated, and contracts with an initially scheduled contractual period of not more than one year are not included in the notes.

The outstanding (or partially outstanding) performance obligations are 4,012 million yen for the current consolidated fiscal year.

These performance obligations relate to the manufacture and sale of industrial machinery in the Machinery Business and it is expected that 49% of them will be recognized as revenue within one year after the end of the year and the remaining approximately 51% will be recognized over one year.

(Notes on Per Share Information)

1. Net assets per share: ¥2,704.29
2. Loss per share: ¥(63.50)

Notes to the Non-consolidated Financial Statements

(April 1, 2023 - March 31, 2024)

(Notes on Information Regarding Significant Accounting Standards)

1. Valuation standards and methods of assets
 - (1) Valuation standards and methods of securities
 - (i) Shares of subsidiaries and shares of affiliates:

Stated at cost using the moving-average method.
 - (ii) Available-for-sale securities

Those other than stocks, etc. for which market prices are not available:

The present market value is recorded based on the market prices, etc., on the last day of the period. (Valuation differences are incorporated into net assets in full. Selling prices were computed based on the moving-average method.)

Stocks, etc. for which market prices are not available:

Stated at cost using the moving-average method.
 - (2) Valuation standards and methods of derivatives

Derivatives:

Market value method
 - (3) Valuation standards and methods of inventories

Finished goods, semi-finished goods, work in process, raw materials and supplies:

Stated at cost based on the periodic average method (method in which book values are lowered based on declines in profitability).
2. Depreciation and amortization methods of depreciable assets
 - (i) Property, plant and equipment (excluding leased assets):

The Company depreciates property, plant and equipment using the declining-balance method.

Certain buildings and structures are depreciated using the straight-line method.

The range of useful lives of main property, plant and equipment is as follows:

| | |
|--------------------------|--------------|
| Buildings | 8 - 31 years |
| Machinery and equipment: | 8 - 14 years |
 - (ii) Intangible assets (excluding leased assets):

The Company amortizes intangible assets using the straight-line method.

Software used in-house is amortized by the straight-line method over its useful life assuming in-house use (5 years).
 - (iii) Leased assets:

Leased assets associated with finance leases in which ownership of the leased assets is not transferred to the lessee

The straight-line method is used assuming the lease period equals the estimated useful life and the residual value at the end of the lease term is nil.

3. Accounting standards for provisions and allowances

(i) Allowance for doubtful accounts:

In order to provide for potential credit losses due to accounts receivable being difficult to collect, loans receivable, etc., allowances of the estimated unrecoverable amounts are reported based on historical loan loss rates for general claims, and on an individual basis for specific receivables including doubtful receivables.

In addition, in order to prepare for losses on uncollectable loans to affiliated companies in the event that an affiliated company becomes insolvent, we calculate an estimate of the uncollectible amount based on the net assets of the affiliated company and by individually taking into account the collectability, and such estimated uncollectible amount is recorded as an allowance for doubtful receivables.

(ii) Provision for retirement benefits:

In order to provide for the payment of retirement benefits for employees, an allowance in the amount deemed to have accrued at the end of the fiscal year under review is recorded based on the projected amount of retirement benefit obligations and pension assets at the end of the fiscal year under review.

In the calculation of retirement benefit obligations, the benefit formula has been used to attribute expected benefits to periods until the end of the fiscal year under review.

Prior service costs are expensed using the straight-line method based on a certain number of years (12 years) within the average remaining service years of the employees at the time of accrual.

Actuarial differences are expensed from the fiscal year subsequent to the year of accrual using the straight-line method based on a certain number of years (12 years) within the average remaining service years of the employees at the time of accrual in each fiscal year.

(iii) Provision for directors' share benefits:

In order to provide for the delivery of the Company's shares for directors, in accordance with the Rules of the Performance Share Plan, an allowance is recorded based on the estimated value of share remuneration plan liabilities at the end of the fiscal year under review.

4. Recording standards of revenue related to sales of products

We and our consolidated subsidiaries manufacture and sell specialty steel, springs, fabricated materials, etc., and with respect to sales of such products, we have performance obligations to deliver products, etc., based on sales agreements with customers. We determine that the performance obligations are fulfilled at the time the customer obtains control over such products and we recognize the revenue of such products.

For domestic sales, revenue is recognized at the time of

shipment because the period from the time of shipment until control of the product is transferred to the customer is normal.

For export sales, revenue is recognized in accordance with the export terms as the timing of when the customer obtains control varies depending on the export terms.

Revenue is measured by deducting discounts, rebates, returns, etc. from the consideration promised under contracts with customers.

5. Other basic and significant information regarding the preparation of Non-consolidated Financial Statements

(i) Hedge accounting method: Deferral hedge accounting is used. In addition, special treatment is applied to interest rate swap contracts that meet the requirements for special treatment.

(ii) Accounting method for retirement benefits:

Accounting methods used to calculate unrecognized actuarial differences on retirement benefit payments and unrecognized past service costs are different from those for the consolidated financial statements.

(Significant accounting estimates)

1. Valuation of investments and loans to affiliated companies

(1) The values of the assets as recorded in non-consolidated financial statements

| | |
|--|------------------|
| Shares of subsidiaries and associates | ¥ 19,100 million |
| Investments in capital of subsidiaries and associates | ¥2,737 million |
| (Among them, amount to MSSC Ahle GmbH– 0 million yen) | |
| Loans receivable | ¥ 15,290 million |
| (Among them, amount to MSSC Ahle GmbH– 4,448 million yen) | |
| Allowance for doubtful accounts | ¥(3,461) million |
| (Among them, amount to MSSC Ahle GmbH – 2,896 million yen) | |

(2) Information on significant accounting estimates for items identified

With respect to shares in affiliates and investments in capital of affiliates, if the real price of the affiliates declines materially compared to the acquisition price, we book an impairment loss unless the collectability is supported by sufficient evidence through future business plans, etc.

Business plans are affected by changes in uncertain economic conditions in the future, and if actual results differ from the plans, the amount of shares in affiliates and investments in affiliates may be materially affected in the Non-consolidated Financial statements for the following business year.

In addition, in order to prepare for losses on uncollectable loans to affiliated companies in the event that an affiliated company becomes insolvent, we calculate an estimate of the uncollectible amount based on the net assets of the affiliated company and by individually taking into account the collectability, and such estimated uncollectible amount is recorded as an allowance for doubtful receivables.

The net assets of the affiliated company in estimating uncollectible amounts may be materially affected by estimates of impairment of fixed assets, and information regarding the content of such estimates is included in the “Notes to consolidated financial statements (Notes to accounting estimates).”

(Notes to the Non-consolidated Balance Sheet)

| | |
|---|--------------------|
| 1. Accumulated depreciation of property, plant and equipment: | 34,463 million yen |
| 2. Contingent liabilities | |
| Guarantees for borrowings of subsidiaries and affiliates: | |
| MSM(THAILAND) CO.,LTD. | 208 million yen |
| PT. JATIM TAMAN STEEL MFG | 7,604 |
| MSM SPRING INDIA PVT. LTD. | 157 |
| 3. Monetary claims and obligations to subsidiaries and affiliates | |
| Short-term monetary claims: | 14,100 million yen |
| Long-term monetary claims: | 2,410 |
| Short-term monetary obligations: | 5,550 |

(Notes to the Non-consolidated Statement of Income)

| | |
|---|-----------------|
| 1. Amount of transactions with subsidiaries and affiliates | |
| Net sales | 795 million yen |
| Purchases | 52,436 |
| Trades other than operating transactions | |
| Interest income | 2,342 |
| Dividend income | 68 |
| Guarantee commission received | 48 |
| 2. Amount of write-down of inventories held for ordinary sale purposes due to decline in profitability | |
| Cost of sales | 6 million yen |
| 3. Gain on sales of investment securities | |
| This was attributable to the fact that the Company sold five stocks listed in Japan, among investment securities held by the Company. | |

(Notes to the Non-consolidated Statement of Changes in Equity)

| | |
|---|------------------------------|
| 1. Type and total number of treasury shares at end of fiscal year under review: | Common shares 494,006 shares |
|---|------------------------------|

(Notes on Tax Effect Accounting)

1. Breakdown of major components of deferred tax assets and deferred tax liabilities

Deferred tax assets

| | |
|--|-----------------|
| Provision for retirement benefits | 482 million yen |
| Long-term accounts payable— other (Retirement benefits for directors) | 3 |
| Amount in excess of depreciation limit | 46 |
| Impairment loss | 235 |
| Accrued expenses | 219 |
| Loss on valuation of investment securities | 257 |
| Loss on valuation of shares of subsidiaries and associates | 10,550 |
| Allowance for doubtful accounts | 1,059 |
| Other | 366 |
| Deferred tax assets—Subtotal | 13,221 |
| Valuation allowance | (12,157) |
| Deferred tax assets—Total | 1,063 |

Deferred tax liabilities

| | |
|---|-----------------|
| Valuation difference on available-for-sale securities | 333 million yen |
| Reserve for advanced depreciation of non- current assets | 258 |
| Prepaid pension cost | 564 |
| Deferred tax liabilities—Total | 1,156 |
| Deferred tax assets—Net | 93 |

(Notes on Revenue Recognition)

The information that is the basis for understanding revenue from contracts with customers is omitted because the same contents as the “Notes on revenue recognition” of the Notes to the Consolidated Financial Statements are stated.

(Notes on Transactions with Related Parties)

1. Subsidiaries and affiliates, etc.

| Type | Company name | Percentage of voting rights held | Relationship with related party | Description of transaction | Transaction amount | Account | Closing balance |
|------------|---------------------------------|----------------------------------|---------------------------------|---|---|--|----------------------------|
| Subsidiary | Mitsubishi Steel Muroran Inc. | Directly owns 70.0% | Purchase of finished goods | Purchase of special steel bars (Note 1) | (Millions of yen) Purchases 49,059 | Accounts payable - trade | (Millions of yen) 4,953 |
| | | | Lending of funds | Lending of operating funds and equipment funds (Note 3) | Amount of lending 500 Repayment value 400 | Short-term loans receivable Long-term loans receivable | 2,700 537 |
| | | | Common officers | Receipt of interest income from loans-receivable | Receipt amount 48 | | |
| | | | | | | | |
| | MSSC CANADA INC. | Directly owns 100.0% | Lending of funds | Lending of operating funds and equipment funds (Note 3) | Amount of lending 4,282 Repayment value 14,888 Receipt amount 1,069 | Short-term loans receivable | 3,555 |
| | | | Supplying of materials | Supply of specialty steel (Note 2) | Supply amount 1,856 | Accounts receivable - other | 665 |
| | | | Capital increase | Underwriting of capital increase | Underwriting amount 11,378 | Shares of subsidiaries | 1,314 |
| | | | Common officers | | | | |
| | MSSC US INC. | Directly owns 100.0% | Lending of funds | Lending of operating funds and equipment funds (Note 3) | Amount of lending 876 Repayment value 11,019 Receipt amount 786 | Short-term loans receivable Accounts receivable - other | 302 1 |
| | | | Capital increase | Underwriting of capital increase | Underwriting amount 10,735 | Shares of subsidiaries | 1,367 |
| | | | Common officers | | | | |
| | | | | | | | |
| | MSSC MFG MEXICANA, S.A. DE C.V. | Directly owns 100.0% | Lending of funds | Lending of operating funds and equipment funds (Note 3) | Amount of lending 421 | Short-term loans receivable Long-term loans receivable | 1,211 605 |
| | | | | Receipt of interest income from loans-receivable | Receipt amount 126 | Accounts receivable - other | 9 |

| Type | Company name | Percentage of voting rights held | Relationship with related party | Description of transaction | Transaction amount | Account | Closing balance |
|------------|----------------------------|----------------------------------|---------------------------------|---|--|-----------------------------|-----------------------------|
| Subsidiary | PT. JATIM TAMAN STEEL MFG. | Directly owns 75.0% | Debt guarantee | Guarantee for borrowings (Note 4) | (Millions of yen) Guarantee amount 7,604 | Long-term loans receivable | 850 |
| | | | Lending of funds | Lending of operating funds and equipment funds (Note 3) | Guarantee commission 45 | | |
| | | | Common officers | Receipt of interest income from loans-receivable | Receipt amount 13 | | |
| | MSSC Ahle Gmbh | Directly owns 100.0% | Lending of funds | Lending of operating funds and equipment funds (Note 3) | Amount of lending 160 | Short-term loans receivable | 4,448 |
| | | | | | Receipt of interest income from loans-receivable | Receipt amount 242 | Accounts receivable - other |

(Notes) Terms of transactions, policies for determining terms of transactions, etc.

1. Purchase prices are determined based on actual costs.
2. Supplied prices of materials are determined based on transaction prices with third parties.
3. For the lending of funds, the interest rate is determined based on the market interest rate, and the terms of repayment are determined according to the purpose of the funds. No collateral is received.
4. This is a guarantee provided on borrowings from banks; guarantee commission is received.
5. For loans receivable from subsidiaries and associates, allowance for doubtful accounts totaling 3,461 million yen is recorded.

(Notes on Per Share Information)

1. Net assets per share: ¥1,847.20
2. Loss per share: ¥(287.72)