

May 13, 2015

For Immediate Release

(English translation of the original Japanese document)

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(Stock code: 2371; First Section of the Tokyo Stock Exchange)

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Notice of Partial Revision of Basic Policy on Construction of Internal Control Systems

Kakaku.com Inc. (the "Company") hereby announces the following partial revisions to its basic policy on construction of the company's internal control systems, as decided at the Board of Directors meeting on May 13, 2015.

(revised portions are underlined)

1. System to ensure that the execution of duties by directors and employees is compliant with the Company's Articles of Incorporation and all relevant laws and regulations.

- (1) The Company will establish a compliance system to realize proper and sound management and to ensure that the actions of directors and employees of the Company are compliant with national and international laws, Company regulations, and social norms and ethics.

To ensure thorough compliance throughout the Company, Administrative Division will be responsible for overseeing companywide compliance efforts and will assume leadership in efforts to educate officers and employees. The Internal Audit Department, in cooperation with the Administrative Division, will monitor the status of compliance practices throughout the Company and make regular reports to the Board of Directors and auditors.

- (2) The Company will not have any connections with antisocial forces and will work resolutely on the organizational and legal fronts, including cooperating with outside experts, to ensure actions by antisocial forces do not threaten the social order and soundness of corporate activities. The company also will not respond to or make any payments related to illegitimate or illegal requests.

2. System for the preservation and management of information related to the execution of duties by directors

Directors, in accordance with document management rules, will document in writing or on electromagnetic media (hereinafter referred to as documents) information related to the execution of their duties or actions taken by employees on behalf of or under orders from the director and ensure

the proper storage of said documents. Directors, auditors and the Internal Audit Department will be able to view these documents in accordance with the document management rules.

3. Regulations and other systems for loss risk management

The Company will establish rules and guidelines governing risks associated with compliance and information security and conduct related training programs. Monitoring of cross-organizational risks and company-wide responses will be the responsibility of the Legal Department and the Information Security Department. Upon the emergence of a serious risk, the Board of Directors shall quickly appoint a director to deal with the specific risk.

4. System to ensure efficient execution of duties by directors

The Board of Directors shall set company-wide goals to be shared by all directors and employees. To achieve these goals, directors responsible for individual businesses will set specific goals for their businesses and determine methods to efficiently realize those goals, including the delegation of authority in accordance with Company rules on authority delegation and decision-making. The Board of Directors will utilize information technology to regularly monitor progress toward the company-wide goals, determine necessary improvements, and create systems that will lead to operational efficiency on a company-wide basis.

5. System to ensure proper business operation of a corporate group consisting of the Company and its subsidiaries

(1) The Company shall establish a system—including the dispatch of executives and other employees to Group companies and the appointment of Company officers and employees as directors of Group companies—that enables the Company to monitor the appropriateness of Group companies' business activities and understand and resolve issues affecting operational efficiency. In addition, the Company shall appoint a director responsible for the operations of each Group company and delegate to that individual the authority and responsibility for establishing legal compliance and risk management systems. The Company unit responsible for managing Group companies will promote these initiatives in a cross-organizational manner and supervise them. The Company will manage Group companies with respect for their autonomy, and Group companies will make regular business reports to the Company. In addition, the Company will conduct prior consultations with Group companies on matters of importance.

(2) The Company shall establish systems that the Company's Internal Audit Department shall conduct internal audits of Group companies on a regular basis and report the results of the audit to the Company's President and auditors.

(3) The Company shall establish systems that require and enable officers and employees to promptly report to the Company unit responsible for managing Group companies if they discover or have concerns that a Group company is in violation of laws and/or Company regulations.

6. Matters relating to employees required to assist in audit duties, such employees' independence from the Board of Directors, and securing the effectiveness of instructions given to such employees

Auditors may instruct employees of the Internal Audit Department to perform tasks deemed necessary to the audit work. In such cases, employees who receive the auditor's instruction will not be subject to orders from directors regarding the requested audit work.

When making requests for the performance of audit-related work, the auditor may also request, after consulting with the Company president, that the staff be assigned to work as an audit staff member. In such cases, subsequent transfers and evaluations of said staff by the Company president must be made after consulting with and receiving the approval of the auditor.

7. Systems for Company directors and employees, and directors, auditors and employees of subsidiaries to submit reports to the Company's auditors and for other reporting to the auditors

The Company shall establish a system that enables Company directors and employees, as well as directors, auditors and employees of Group companies to promptly report, directly or indirectly via an internal reporting system, to the Company's auditors matters of concern related to legal issues, any matters that may have a serious impact on the Company and/or one or more of its Group companies, and compliance-related situations. Reporting procedures (i.e., person filing the report, person receiving the report, report timing, etc.) shall be determined in consultation with auditors.

8. System to ensure that report filers are not subject to unfavorable treatment owing to filing of reports

The Company prohibits the unfavorable treatment of Group officers and employees owing to their having submitted reports as stated in the previous clause, either through the internal reporting system or some other means.

9. Matters concerning policies for the treatment of expenses or liabilities arising from execution of auditor duties

The Company shall promptly process claims for payment by the auditor for expenses incurred in the execution of audit duties, including requests for advance payments, except when the expenses are deemed unnecessary for the execution of the auditor's duties.

10. System to ensure that auditors' other work is carried out effectively

Auditors shall receive periodic internal audit reports from the Internal Audit Department, consult with outside auditing firms as appropriate, and be able to exchange information and opinions with directors as needed.