

February 5, 2010

Unison Capital, Inc.

Measures to Further Strengthen Unison's Internal Control Systems

In connection with the investigation of a former Unison partner for alleged insider trading activities, this release outlines the measures formulated by Unison, on February 3, 2010, to further strengthen its internal control systems in order to prevent the recurrence of such activities.

1. Review of the measures to further strengthen Unison's internal control systems

Unison established, on December 28, 2009, the "Committee to Restore Confidence and Rehabilitate the Company through Enhancements to Internal Controls" (the "Rehabilitation Committee"), for the purpose of proposing measures to further strengthen Unison's internal control systems.

The Rehabilitation Committee consists of several directors and employees of Unison, as well as two Unison Partners, who, under the auspices of a company-wide effort, have been formulating the strengthening measures. In discussing specific measures to strengthen internal controls, in addition to discussions within Unison, meetings were held to discuss precedents of Unison's competitors and present conditions of major securities companies. Furthermore, Unison has sought the advice of outside experts, including various major Japanese or foreign law firms and accounting firms.

2. Outline of the measures to further strengthen Unison's internal control system

Set forth below is an outline of the measures to further strengthen Unison's internal control systems.

A. Tightening information control systems

In order to prevent the dissemination and leakage of material information, such as information relating to investments, Unison has fundamentally reviewed its document management and information systems. Accordingly, Unison will formulate new information security policies and provide thorough notification of such new policies to all of Unison's directors and employees. In addition, Unison plans to have audits conducted on information security.

B. Strengthening equity securities trading restrictions and monitoring holdings of equity securities

Unison has made its internal equity securities trading restrictions stricter, for all full-time directors and employees of Unison, and family members of, and entities under the control of, such full-time directors and employees. Most importantly, Unison has prohibited, in principle, all trading of Japanese equity securities. In addition, with respect to other financial products, directors and employees will be required to regularly report their holdings of such financial products to Unison, and Unison will monitor such holdings.

C. Enhancements to educational structure and education and training

Unison has established a new Compliance Committee and has also enhanced the functions of the existing Compliance Department. Unison intends to employ an individual with the ability and experience as a compliance specialist on the Compliance Committee. Unison is considering commissioning audit firms to provide support with respect to operational audits.

With respect to human resources, the requirement for directors and employees to regularly submit an “Oath regarding Compliance with Applicable Laws, Ordinances and Internal Rules and Bylaws” will be strictly enforced. With respect to personnel evaluations, the importance of the “compliance” item will be made clearer, and will be given more weight than it has in the past. With respect to enhancements to education and training, Unison will increase the frequency of compliance training sessions from once per year to once per quarter, and Unison will also aim to improve the quality of the contents of the sessions.

D. Establishment of self-discipline as a rigorous organization

Unison will place further importance on the control functions exerted by outside experts on Unison and will work to further strengthen its internal controls. In addition, Unison intends to engage in continuous institutional improvement activities with all of its directors and employees.

Going forward, Unison will endeavor to recover your confidence and will aim to prevent inappropriate or illegal behavior by having all of its directors and employees work together to maintain a high level of awareness of compliance.

Contact

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