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Document filed

Internal Control Report

Governing law

Paragraph 1, Article 24-4-4 of the Financial Instruments and Exchange Act

Location to which the document is submitted

The Director-General of the Kanto Local Finance Bureau

Date of submission

June 25, 2009

Name of company

ACOM CO., LTD. (the Company)

English name of company

ACOM CO., LTD.

Name and position of representative

Shigeyoshi Kinoshita
President and Chief Executive Officer

Name and position of chief financial officer

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Address of head office

2-1-1 Marunouchi, Chiyoda-ku, Tokyo

Location of public inspection

Tokyo Stock Exchange, Inc.
(2-1 Nihonbashi Kabutocho, Chuo-ku, Tokyo)

1 Matters concerning the basic framework for internal control over financial reporting

Shigeyoshi Kinoshita, President & CEO, is responsible for establishing and maintaining internal control over the Company's financial reporting, and he establishes and maintains internal control over financial reporting in line with the basic framework for internal control set forth in "On the Setting of the Standards and Practice Standards for Management Assessment and Audit Concerning Internal Control Over Financial Reporting (Council Opinions)" released by the Business Accounting Council.

Internal control seeks to achieve its goals within a reasonable range through the organic linking and integrated functioning of the basic elements of internal control. Accordingly, it is possible that internal control over financial reporting cannot fully prevent or discover the inclusion of misstatements in financial reports.

2 Matters concerning assessment scope, reference date, and assessment procedures

Internal control over financial reporting has been assessed using March 31, 2009, the last day of the current fiscal year examined, as the reference date, and generally accepted standards for assessment of internal control over financial reporting were applied in making this assessment.

After assessing internal control (companywide internal control) having a significant impact on overall financial reporting on a consolidated basis, the operational processes to be assessed were selected in accordance with the results. To assess these operational processes, the selected operational processes were analyzed and the efficacy of internal control then evaluated by determining the essential aspects of control having a significant impact on the reliability of financial reporting and assessing the establishment and maintenance of these essential aspects.

The required scope for assessing internal control over financial reporting at the Company and its consolidated subsidiaries was determined on the basis of the significance of the impact on the reliability of financial reporting. The significance of the impact on the reliability of financial reporting was itself determined from the perspectives of monetary and qualitative impact, and the scope for assessing internal control over operational processes was then determined rationally based on the results of assessments of companywide internal control conducted at the Company and all 16 consolidated subsidiaries.

In deciding on the scope for assessing internal control over operational processes, the top two-thirds of locations in terms of operating revenue (before the elimination of

transactions between consolidated companies) for the consolidated fiscal year were selected as “key business locations.” At the selected key business locations, operational processes were assessed for accounts highly relevant to the company’s business objectives, including operating revenue, accounts receivable-operating loans, loans payable, and bonds payable relating to fund procurement. Furthermore, operational processes pertaining to major accounts containing estimates and forecasts for which there exists a high possibility of critical misstatements as well as operational processes connected with businesses or operations involving high-risk transactions, whether these processes occur at selected key business locations or elsewhere, were additionally assessed as key operational processes due to their impact on financial reporting.

3 Matters concerning assessment results

The aforementioned assessments determined that the Company’s internal control over financial reporting was effective as of the last day of the current fiscal year examined.

4 Additional matters

Not applicable

5 Matters of special note

Not applicable