



June 29, 2011

To whom it may concern:

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Section 1)  
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### **Opinion and Principle for the Reduction in Investment Units**

a. Opinion for the Reduction in Investment Units

ROHM reduced the investment units from 1,000 to 100 in August, 1999, since ROHM considers that making effort for activating circulation of ROHM'S stocks in the market and expanding the range of investors as important measures. ROHM believes it has certain level of efficiency since its shareholders increased around 5.4 times from 5,248 as of march 31, 1999 to 28,577 on March 31, 2011.

b. Principle for the Reduction in Investment Units

ROHM believes that current number of shareholders and liquidity are both sufficient. As for further reduction in investment units, we will decide considering liquidity and cost efficiency carefully.