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For Immediate Release

REIT Issuer

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(Security Code: 8979)

Asset Management Company

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Notice Concerning Determination of Matters Related to Repurchase of Own Investment Units and Amendments to Internal Rules (Management Guideline) of the Asset Management Company

Starts Proceed Investment Corporation (“Starts Proceed”) determined at its Board of Directors’ meeting held today matters related to repurchase of own investment units based on Article 80-2 of the Act on Investment Trusts and Investment Corporations reinterpreted and applied pursuant to Article 80-5, Paragraph 2 of the said Act.

Starts Asset Management Co., Ltd., to which Starts Proceed entrusts the management of its assets, resolved at its Board of Directors’ meeting held today to change the management guideline related to the asset management of Starts Proceed (the “Management Guideline”) with an aim to add the matters concerning repurchase and cancellation of own investment units. Moreover, all investment units repurchased by Starts Proceed are scheduled to be cancelled during the fiscal period ending April 2019. Details are as follows.

1. Reason for Repurchase of Investment Units

Comprehensively taking into account factors such as the level of investment unit price, status of cash on hand, financial status and market environment, Starts Proceed judged that improvement in capital efficiency and returns to unitholders through the repurchase and cancellation of own investment units will lead to improvement in unitholder value over the medium to long term.

The price of investment units of Starts Proceed remains at an undervalued range below NAV per unit (Note). Under such circumstances, Starts Proceed implemented various measures with the intention of improving unitholder value and further expanding the investor base including improvement in the value of properties it owns through property replacement, acquisition of credit ratings and strategic capital expenditures. While considering the use of free cash as implementation of measures contributing to continuous improvement in unitholder value, Starts Proceed believes that the utilization of part of the free cash in the acquisition of Starts Proceed’s investment units, which are at a relatively low level, will lead to an increase in distribution per unit and therefore contribute to improvement in unitholder value.

(Note) NAV per unit is calculated by dividing net asset value, reflecting unrealized gain/loss which is the gap between book-value and appraisal value of investment assets, by the number of outstanding investment units.

Disclaimer: This document is a press release prepared for public announcement concerning determination of repurchase of own investment units and has not been prepared as an inducement or invitation for investment.

2. Details of Matters Related to Repurchase of Investment Units

(1) Total number of investment units to be repurchased	Up to 3,000 units (1.17% of the total number of issued investment units (excluding the number of owned investment units))
(2) Total repurchase amount for investment units	Up to 550 million yen
(3) Period for repurchase	From March 27, 2019 to April 19, 2019

Starts Proceed Investment Corporation will terminate the transaction regarding repurchase when either the total number of investment units or the total repurchase amount for investment units reaches the maximum amount, or when the period for repurchase expires. The total repurchase amount for investment units has been determined based on a level that will have no significant impact on Starts Proceed's financial management, taking into account LTV level, current status of cash on hand, future depreciation, capital expenditures, etc.

(Note) Due to the level of investment unit price, liquidity of investment units, market trends, etc., it is possible the total number of investment units and total repurchase amount will not reach the maximum level, or that no repurchase is conducted.

3. Repurchase Method

Starts Proceed plans to enter into a discretionary transaction contract with securities companies and let them purchase from the market, Tokyo Stock Exchange.

Moreover, after the repurchase, Starts Proceed plans to cancel all owned investment units in the Fiscal Period Ending April 30, 2019 upon resolution of the Board of Directors of Starts Proceed Investment Corporation.

4. Main Content of Change in Management Guideline

The provision concerning the repurchase and cancellation of own investment units corresponding to Article 7, Paragraph 2 of Starts Proceed's Articles of Incorporation will be clearly specified and the provision on the matters that need to be taken into account upon consideration of repurchase and cancellation of own investment units will be added to the Management Guideline upon the determination of the above efforts as described in the following comparison table of the new and old provisions. The revised parts are underlined.

Before Change	After Change
<p>Article 43 (Issuance of investment units)</p> <p>1. The Company can solicit underwriters of the investment units to be issued after obtaining approval at the Board of Directors' meeting with an aim to acquire assets under management, pay the construction costs for the specified assets which have already been acquired and repay working capital or debt within the range of the total number of issuable investment units stipulated in the Articles of Incorporation on behalf of Starts Proceed.</p>	<p>Article 43 (Additional issuance of new investment units, repurchase and cancellation of own investment units)</p> <p>1. The Company can solicit underwriters of the investment units to be issued after obtaining approval at the Board of Directors' meeting with an aim to acquire assets under management, pay the construction costs for the specified assets which have already been acquired and repay working capital or debt within the range of the total number of issuable investment units stipulated in the Articles of Incorporation on behalf of Starts Proceed.</p> <p><u>The amount of money paid in exchange for investment equity for subscription (investment units allocated to those who applied for the underwriting of the said investment units in accordance with the solicitation) shall be the amount approved at Starts Proceed's Board of Directors' meeting as a fair amount in light of the details of the assets under management.</u></p>

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Before Change	After Change
<p><u>2. The amount of money paid in exchange for investment equity for subscription (investment units allocated to those who applied for the underwriting of the said investment units in accordance with the solicitation) shall be the amount approved at Starts Proceed’s Board of Directors’ meeting as a fair amount in light of the details of the assets under management.</u></p> <p style="text-align: center;">(Newly established)</p>	<p style="text-align: center;">(Deleted)</p> <p><u>2. The Company will also consider the repurchase and cancellation of own investment units in pursuit of improvement in capital efficiency and returns to unitholders of Starts Proceed. It will judge whether repurchase and cancellation of own investment units will be implemented upon prudent assessment of factors such as the level of investment unit price, status of cash on hand, financial status and market environment from the perspective of improving unitholder value over the medium to long term.</u></p>

5. Scheduled Date of Change
March 26, 2019

6. Other
As for this matter, an extraordinary report has been submitted to the Kanto Local Finance Bureau as of March 26, 2019.

(Reference Information)

1. Number of Repurchased Investment Units as of March 26, 2019

Total number of investment units issued (excluding the number of repurchased investment units)	256,777 units
Number of repurchased investment units	0 units

2. Expected Impact of Repurchase and Cancellation of Own Investment Units on Distribution per Unit
Please refer to “Notice Concerning Revisions to Management Status and Distribution Forecast for the Fiscal Period Ending April 2019” separately announced today.

* Distribution: Kabuto Club, Ministry of Land, Infrastructure, Transport and Tourism Press Club, and Ministry of Land, Infrastructure, Transport and Tourism Press Club for Construction Publications

* Starts Proceed website: <https://www.sp-inv.co.jp/en/>