

Exhibit 1

Code of Conduct Exemption Request Form

Internet Corporation for Assigned Names and Numbers (“ICANN”)
12025 Waterfront Drive, Suite 300
Los Angeles, California 90094
Attention: New gTLD Program Staff

RE: Request for Exemption from Registry Operator Code of Conduct

Sakura Internet Inc. (“Registry Operator”), in connection with the execution of the Registry Agreement for the .sakura TLD (the “Registry Agreement”), hereby requests an exemption from the obligations of the Registry Operator Code of Conduct set forth in Specification 9 to the Registry Agreement (the “Code of Conduct”). Pursuant to such request, Registry Operator confirms that each of the following statements is true and correct (collectively, referred to as the “Statements”):

1. All domain name registrations in the TLD are registered to, and maintained by, Registry Operator for the exclusive use of Registry Operator or its Affiliate (as defined in the Registry Agreement);
2. Registry Operator does not sell, distribute or transfer control or use of any registrations in the TLD to any third party that is not an Affiliate of Registry Operator; and
3. Application of the Code of Conduct to the TLD is not necessary to protect the public interest for the following reasons:
 - The only eligible Registrants for .sakura are the Registry Operator itself, namely “SAKURA Internet Inc.”, and its Affiliates as indicated in the attached “TLD Registration Policies (.sakura)”.
 - The approval of this Exemption Request will not affect third parties, and therefore, protection for other registrants is not required.

Registry Operator represents that the registration policies attached hereto as Schedule A are a true and correct copy of the Registry Operator's registration policies for the TLD. Registry Operator agrees to notify ICANN promptly in writing in the event any of the Statements has become untrue (whether before or after an exemption has been granted). Registry Operator further acknowledges and agrees that the Exemption will be void if at any time any of the Statements has become untrue.

Submitted by:  _____

Position: Senior Chief

Date Noted: April 10, 2015

Email:  _____

Schedule A

Registry Operator hereby acknowledges that the following are the true and correct registration policies for the TLD:

[Registry Operator to attach registration policies for the TLD]

TLD Registration Policies (.sakura)

Mission

SAKURA Internet Inc. ("SAKURA Internet") was established on August 17, 1999, and in just 6 years of rapid growth, we became a public company on October 12, 2005, listed under Tokyo Stock Exchange MOTHERS (Market Of The High-growth and Emerging Stocks): Code 3778. Since the IPO, our business has maintained a steady performance and growth by carrying out our services with a company motif, "SAKURA," which has attracted widespread popularity, and we have become one of Japan's leading IT companies.

The concept (goals) of the ".sakura" encompass several ideas: (A) protecting the momentum of our business growth and 16 years worth of our penetration with the "SAKURA" Internet brand, by applying ICANN for ".sakura"; (B) leveraging ".sakura" effectively to achieve advanced user-friendliness and to gain the loyalty of our customers for the purposes of consumer trust and choice; (C) taking advantages of a safer and more secure domain name environment by providing ".sakura" for the purposes of creating new projects and conducting various research and studies; and (D) implementing an environment where we plan => develop => commercialize new features to establish an optimized and most advanced "service value chain," by adopting ".sakura" for the purpose of promoting robust competition.

".sakura" is a significant opportunity for SAKURA Internet, which is currently in practice to operate and manage all the data center services on a one integrated platform. For instance, by consolidating the SAKURA Internet domain name environments, we will attain the opportunity to directly contribute to improve service levels, user experiences and brand awareness. Furthermore, since SAKURA Internet has been conventionally user oriented in practicing research and preventive management for the countermeasures against abusive uses and fraudulent activities, by implementing the new gTLD we will be able to enhance our capabilities to research and plan for a safer and more secure environment for the use of internet. Consequently, along with the price reduction achieved by our economies of scale, our capabilities will lead to a healthier and robust competitive services market.

Registration Policies

The Registry Operator for .sakura, SAKURA Internet implements the following registration policies:

- A) Eligibility Policy
- B) Anti-Abuse Policy
- C) Rights Protection Mechanisms
- D) ICANN Consensus Policies

TLD Registration Policies (.sakura)

A) Eligibility Policy

The only eligible Registrants for .sakura are the Registry Operator itself, namely “SAKURA Internet Inc.”, and its Affiliates.

B) Anti-Abuse Policy

SAKURA Internet is committed to minimizing abusive registration activities and other illegal activities within the .sakura namespace, by including the following legal terms and conditions into all .sakura domain name registration agreements:

The nature of such abuses creates security and stability issues for the registries, registrars and registrants, as well as for the users of the Internet in general. SAKURA Internet defines abusive use of a domain name to include, without limitation, the following illegal or fraudulent actions.

- Botnet commands and control:

Services run on a domain name that are used to control a collection of compromised computers or "zombies," or to direct denial-of-service attacks (i.e. DDoS attacks);

- Distribution of child pornography;

- Fast flux hosting:

Use of fast-flux techniques to disguise the location of Web sites or other Internet services, or to avoid detection and mitigation efforts, or to host illegal activities. Fast-flux techniques use DNS to frequently change the location on the Internet to which the domain name of an Internet host or name server resolves. Fast flux hosting may be used only with prior permission of .sakura;

- Pharming:

The redirecting of unknowing users to fraudulent sites or services, typically through DNS hijacking or poisoning;

- Phishing:

The use of counterfeit Web pages that are designed to trick recipients into divulging sensitive data such as usernames, passwords, or financial data;

- Spam:

The use of electronic messaging systems to send unsolicited bulk messages. The term applies to e-mail spam and similar abuses such as instant messaging spam, mobile messaging spam, and the spamming of Web sites and Internet forums. An example, for purposes of illustration, would be the use of email in denial-of-service attacks;

- Willful distribution of malware:

The dissemination of software designed to infiltrate or damage a computer system without the owner's informed consent. For example computer viruses, worms, keyloggers, and trojan horses, however, they are not limited.

- **Illegal Access to Other Computers or Networks:**

Illegally accessing computers, accounts, or networks belonging to another party, or attempting to penetrate security measures of another individual's system (often known as "hacking"). Also, any activities that might be used to attempt on system penetration (e.g. port scan, stealth scan, or other information gathering activity) are included.

SAKURA Internet will reserve the right to deny, cancel or transfer any registration or transaction, or place any domain name(s) on registry lock, hold or similar status as it deems necessary, in its discretion;(1)to protect the integrity and stability of the registry;(2)to comply with any applicable laws, government rules or requirements, requests of law enforcement, or any dispute resolution process;(3)to avoid any liability, civil or criminal, on the part of SAKURA Internet, as well as its affiliates, officers, directors, and employees;(4)per the terms of the registration agreement;(5)to correct mistakes made by SAKURA Internet or any Registrar in connection with a domain name registration; or(6)due to abusive uses, as defined above, undertaken with respect to .sakura domain names. SAKURA Internet also reserves the right to place upon registry lock, hold or similar status a domain name during resolution of a dispute.

All reports of abuse should be sent to Abuse Contact.

C) Rights Protection Mechanisms

SAKURA Internet plans to implement all Rights Protection Mechanisms (RPMs) required by ICANN. These RPMs include, but are not limited to the following:

- Trademark Claims Services
- Uniform Domain Name Dispute-Resolution Policy(UDRP)
- Uniform Rapid Suspension System(URS)