May 18, 2010

Koichiro Watanabe President and Representative Director The Dai-ichi Life Insurance Company, Limited Code: 8750 (TSE First section)

Disclosure of European Embedded Value as of March 31, 2010

The Dai-ichi Life Insurance Company, Limited (hereinafter "Dai-ichi Life") hereby discloses the European Embedded Value ("EEV") of Dai-ichi Life and Dai-ichi Frontier Life Insurance Co., Ltd (hereinafter "Dai-ichi Frontier Life" or "DFL") (collectively, the "Group") as of March 31, 2010.

Contents

1. Outline

- 1-1 About EEV
- 1-2 EEV Methodology

2. EEV as of March 31, 2010

- 2-1 EEV Results of the Group
 - 2-1-1 Adjusted Net Worth
 - 2-1-2 Value of In-force Business
 - 2-1-3 Value of New Business
- 2-2 EEV by Company

3. Movement Analysis

- 3-1 Movement Analysis of Group EEV
- 3-2 Movement Analysis by Company

4. Sensitivity Analysis

- 4-1 Sensitivity Analysis of Group EEV
- 4-2 Sensitivity Analysis by Company

5. Note on Using EV

Appendix A: EEV Methodology

Appendix B: Principal EEV Assumptions

Appendix C: Actuarial Opinion

Appendix D: Glossary

1. Outline

1-1 About EEV

The EEV Principles and related guidance were published in May 2004 by the CFO Forum, an organization comprising the chief financial officers of Europe's leading life insurers, in order to improve consistency and transparency in EV reporting. In October 2005, further guidance on minimum required disclosures of sensitivities and other items was provided by the CFO Forum.

1-2 EEV Methodology

In the calculation of EEV, the Group has adopted a market-consistent approach – an approach which values cash flows from both assets and liabilities of a company consistently with comparable financial instruments traded in the market. An increasing number of insurers, mainly in Europe, have implemented similar market-consistent approaches, and in response to such trends, the CFO Forum published the European Insurance CFO Forum Market Consistent Embedded Value Principles©¹ (the "MCEV Principles") in June 2008. The use of the MCEV Principles was intended to be mandatory for EV reporting for member insurers with effect from fiscal year 2009. However, in light of recent severe market conditions, the principles were revised in October 2009, and it was decided to defer mandatory MCEV reporting for all members until 2011.

Taking into consideration the current situation, the Group has fully adopted the EEV Principles, while also taking into account a market-consistent approach, in calculating its EV.

3

_

 $^{^{\}rm 1}$ Copyright © Stichting CFO Forum Foundation 2008

2. EEV as of March 31, 2010

2-1 EEV Results of the Group

The EEV of the Group as of March 31, 2010 is as follows:

(billions of yen)

		March 31, 2009	March 31, 2010	Increase (Decrease)
EI	EV	1,758.4	2,836.3	1,077.8
	Adjusted net worth	1,296.6	1,863.5	566.8
	Value of in-force business	461.8	972.8	510.9
Va	llue of new business	83.5	118.9	35.3

⁽Note 1) The Group EEV is calculated as follows: Dai-ichi Life's EEV plus DFL's EEV attributable to Dai-ichi Life's equity stake in DFL less Dai-ichi Life's carrying amount of equity of DFL.

2-1-1 Adjusted Net Worth

Adjusted net worth represents the net assets attributed to shareholders and represents the market value of assets in excess of policyholder liabilities, represented by statutory reserves (excluding contingency reserve), and other liabilities (excluding reserve for price fluctuations).

In other words, adjusted net worth is calculated by adjusting the total net assets on the balance sheet for the retained earnings in liabilities, general reserve for possible loan losses, unrealized gains/losses in assets/liabilities not accounted for under the mark-to-market methodology, unfunded retirement benefit obligations, and tax effect equivalent of the items above. The breakdown of the Group's adjusted net worth is as follows:

⁽Note 2) Dai-ichi Life held 93.9% and 90.0% of the shares of DFL as of March 31, 2009 and as of March 31, 2010, respectively.

⁽Note 3) Dai-ichi Life's carrying amount of DFL's equity was ¥151.9 billion as of March 31, 2009 and ¥163.4 billion as of March 31, 2010.

	March 31, 2009	March 31, 2010	Increase (Decrease)
Adjusted net worth	1,296.6	1,863.5	566.8
Total net assets on the balance sheet (Note1)	645.0	720.9	75.8
Retained earnings in liabilities (Note2)	625.8	698.5	72.7
General reserve for possible loan losses	7.4	4.8	(2.6)
Unrealized gains (losses) on securities and miscellaneous items (Note3)	264.1	1,068.2	804.1
Unrealized gains (losses) on loans	160.5	209.3	48.8
Unrealized gains (losses) on real estate ^(Note4)	261.0	105.0	(155.9)
Unrealized gains (losses) on liabilities ^(Note5)	(9.7)	(19.7)	(10.0)
Unfunded retirement benefit obligation ^(Note6)	(42.8)	(28.5)	14.3
Tax effect equivalent of above items	(456.1)	(715.6)	(259.4)
Consolidation adjustment ^(Note7)	(151.9)	(163.4)	(11.5)
Minority interest in DFL's adjusted net worth ^(Note8)	(6.6)	(16.2)	(9.6)

- (Note 1) Foundation funds, the total amount of valuation and translation adjustments and expected disbursements from capital outside the company are excluded. Expected shareholder dividends as of March 31, 2010 is not included in expected disbursements from capital outside the company.
- (Note 2) The sum of reserve for price fluctuations, contingency reserve, and the unallocated portion of reserve for policyholder dividends is reported.
- (Note 3) For purposes of EEV calculations, domestic listed stocks are recorded at their market value as of the end of the reporting period, whereas for accounting purposes under Japanese GAAP, they are recorded on the balance sheet at their average value during the last month of the reporting period. The difference (the value for purposes of EEV calculations less the value recorded on our balance sheet) (after tax) was ¥37.2 billion as of March 31, 2009, and ¥85.2 billion as of March 31, 2010.
- (Note 4) With respect to land, the difference between fair value and carrying value before revaluation is posted.
- (Note 5) The figure represents the unrealized gains (losses) in foundation funds and subordinated debt that Dai-ichi Life issued.
- (Note 6) The sum of unrecognized gains on plan amendments and unrecognized actuarial differences is reported.
- (Note 7) Dai-ichi Life's carrying amount of equity of DFL, which is reported in "Total net assets on the balance sheet", is deducted to offset.
- (Note 8) Minority interest in DFL's adjusted net worth is deducted.
- (Note 9) All the items from "Total net assets on the balance sheet" to "Tax effect equivalent of above items" display the sum of the figures for Dai-ichi Life and DFL.

Reconciliations between the Group's adjusted net worth and total net assets are as follows:

	March 31, 2009	March 31, 2010	Increase (Decrease)
Total Net Assets (Note1)	496.5	558.7	62.1
PLUS Retained earnings in liabilities (Note2)	625.8	698.5	72.7
PLUS General reserve for possible loan losses	7.4	4.8	(2.6)
PLUS Unrealized gains/losses (Note3)	665.8	1,345.5	679.6
PLUS Unfunded retirement benefit obligation (Note4)	(42.8)	(28.5)	14.3
PLUS Tax effect equivalent of above items	(456.1)	(715.6)	(259.4)
LESS Book value of businesses not covered	0.0	0.0	0.0
Adjusted net worth	1,296.6	1,863.5	566.8

- (Note 1) Foundation funds, the total amount of valuation and translation adjustments, minority interest and expected disbursements from capital outside the Group are excluded. Expected shareholder dividends as of March 31, 2010 is not included in expected disbursements from capital outside the company.
- (Note 2) The sum of reserve for price fluctuations, contingency reserve, and the unallocated portion of reserve for policyholder dividends is reported.
- (Note 3) The sum of the unrealized gains/losses in securities and miscellaneous items, loans, real estate and liabilities is reported. Due to the consolidation adjustment with regard to consolidated subsidiaries and affiliated companies accounted for under the equity method, unrealized gains/losses on equity within this item is different from the sum of the unrealized gains/losses on equity in Dai-ichi Life and DFL.
- (Note 4) The sum of unrecognized gains on plan amendments and unrecognized actuarial differences is reported.

2-1-2 Value of In-force Business

The value of in-force business is the amount of (i) certainty equivalent present value of future profits, less (ii) time value of financial options and guarantees, less (iii) cost of holding required capital, less (iv) allowance for non-financial risks. The breakdown by item is as follows:

(billions of yen)

		March 31, 2009	March 31, 2010	Increase (Decrease)
Value of in-f	orce business	461.8	972.8	510.9
Certainty profits ^(No)	equivalent present value of future	644.2	1,182.3	538.1
Time val	ue of financial options and es	(97.4)	(123.3)	(25.8)
Cost of h	olding required capital	(36.9)	(38.2)	(1.3)
Allowand	ce for non-financial risks	(48.0)	(48.0)	0.0

(Note 1) The increase in certainty equivalent present value of future profits is mainly attributed to the rise in risk-free rates.

2-1-3 Value of New Business

The value of new business is the value at the time of sale, after all acquisition-related costs, of new policies (including net increase by conversion) obtained during the reporting period. The value of new business for the year ended March 31, 2010 is as follows:

(billions of yen)

		Year ended March 31, 2009	Year ended March 31, 2010	Increase (Decrease)
Va	alue of new business	83.5	118.9	35.3
	Certainty equivalent present value of future profit	113.8	162.7	48.9
	Time value of financial options and guarantees	(24.1)	(34.1)	(10.0)
	Cost of holding required capital	(4.0)	(7.0)	(2.9)
	Allowance for non-financial risks	(2.0)	(2.6)	(0.6)

The new business margins (the ratio of the value of new business to the present value of premium income) are as follows:

(billions of yen)

	Year ended March 31, 2009	Year ended March 31, 2010	Increase (Decrease)
Value of new business	83.5	118.9	35.3
Present Value of Premium Income ^(Note1)	2,505.5	2,989.5	483.9
New Business Margin	3.34%	3.98%	0.64 points

(Note 1) Future premium income is discounted by the risk-free rate used for the value of new business calculation.

2-2 EEV by Company

(1) Dai-ichi Life

	March 31, 2009	March 31, 2010	Increase (Decrease)
EEV (Note1)	1,795.9	2,868.0	1,072.1
Adjusted net worth	1,345.8	1,880.9	535.0
Total net assets (Note2)	540.4	604.6	64.2
Retained earnings in liabilities (Note3)	621.4	653.6	32.2
General reserve for possible loan losses	7.4	4.8	(2.6)
Unrealized gains (losses) on securities and miscellaneous items (Note4)	263.5	1,066.4	802.8
Unrealized gains (losses) on loans	160.5	209.3	48.8
Unrealized gains (losses) on real estate (Note5)	261.0	105.0	(155.9)
Unrealized gains (losses) on liabilities (Note6)	(9.7)	(19.7)	(10.0)
Unfunded retirement benefit obligation (Note7)	(42.8)	(28.5)	14.3
Tax effect equivalent of above items	(455.9)	(714.9)	(258.9)
Value of in-force business	450.0	987.1	537.1
Certainty equivalent present value of future profits	615.9	1,141.5	525.5
Time value of financial options and guarantees	(82.6)	(71.4)	11.2
Cost of holding required capital	(35.6)	(35.9)	(0.3)
Allowance for non-financial risks	(47.6)	(47.0)	0.6
Value of new business	102.1	135.6	33.5
Certainty equivalent present value of future profits	108.2	143.6	35.3
Time value of financial options and guarantees	(1.3)	(1.5)	(0.1)
Cost of holding required capital	(3.0)	(4.5)	(1.4)
Allowance for non-financial risks	(1.6)	(1.8)	(0.2)

- (Note 1) Dai-ichi Life's share of DFL is valued on a book value basis. The EEV of the Group is adjusted for consolidation.
- (Note 2) Foundation funds, total of valuation and translation adjustments and expected disbursements from capital outside the company are excluded. Expected shareholder dividends as of March 31, 2010 is not included in expected disbursements from capital outside the company.
- (Note 3) The sum of reserve for price fluctuations, contingency reserves, and the unallocated portion of reserve for policyholder dividends is reported.
- (Note 4) For purposes of EEV calculations, domestic listed stocks are recorded at their market value as of the end of the reporting period, whereas for accounting purposes under Japanese GAAP, they are recorded on the balance sheet at their average value during the last month of the reporting period. The difference (the value for purposes of EEV calculations less the value recorded on our balance sheet) (after tax) is \(\frac{1}{2}\)37.2 billion as of March 31, 2009, and \(\frac{1}{2}\)85.2 billion as of March 31, 2010.
- (Note 5) With respect to land, the difference between fair value and carrying value before revaluation is posted.
- (Note 6) The figure represents the unrealized gains (losses) in foundation fund and subordinated debt that Dai-ichi Life issued.

[Unofficial translation]

(Note 7) The sum of unrecognized gains on plan amendments and unrecognized actuarial differences is reported.

The new business margins (the ratio of the value of new business to the present value of premium income) are as follows:

	Year ended	Year ended	Increase
	March 31, 2009	March 31, 2010	(Decrease)
Value of new business	102.1	135.6	33.5
Present Value of Premium Income ^(Note1)	2,161.3	2,265.4	104.1
New Business Margin	4.73%	5.99%	1.26 points

(Note 1) Future premium income is discounted by the risk-free rate used for the value of new business calculation.

(2) Dai-ichi Frontier Life

	March 31, 2009	March 31, 2010	Increase (Decrease)
EEV (Note1)	121.8	146.3	24.4
Adjusted net worth	109.3	162.2	52.9
Total net asset (Note2)	104.5	116.2	11.6
Retained earnings in liabilities (Note3)	4.3	44.8	40.4
General reserve for possible loan losses	0.0	0.0	0.0
Unrealized gains (losses) on securities and miscellaneous items	0.5	1.8	1.3
Unrealized gains (losses) on loans	0.0	0.0	0.0
Unrealized gains (losses) on real estate	0.0	0.0	0.0
Unrealized gains (losses) on liabilities	0.0	0.0	0.0
Unfunded retirement benefit obligation	0.0	0.0	0.0
Tax effect equivalent of above items	(0.1)	(0.6)	(0.4)
Value of in-force business (Note4)	12.5	(15.9)	(28.5)
Certainty equivalent present value of future profits	30.1	45.4	15.2
Time value of financial options and guarantees	(15.7)	(57.6)	(41.9)
Cost of holding required capital	(1.3)	(2.5)	(1.1)
Allowance for non-financial risks	(0.4)	(1.1)	(0.7)
Value of new business	(19.7)	(18.5)	1.1
Certainty equivalent present value of future profits	5.9	21.3	15.3
Time value of financial options and guarantees	(24.2)	(36.2)	(12.0)
Cost of holding required capital	(1.0)	(2.8)	(1.7)
Allowance for non-financial risks	(0.3)	(0.8)	(0.4)

⁽Note 1) This table shows the full value of DFL as an independent entity. When used in the calculation of Group EEV, the value is in proportion to Dai-ichi Life's shareholding in DFL (93.9% as of March 31, 2009 and 90.0% as of March 31, 2010).

⁽Note 2) The total of valuation and translation adjustments is excluded.

⁽Note 3) The sum of the reserve for price fluctuations and contingency reserve is reported.

⁽Note 4) The decrease of Value of in-force business was mainly attributable to a reversal of reserves associated with guaranteed minimum benefits of certain variable annuity products (¥36.9) billion.

The new business margins (the ratio of the value of new business to the present value of premium income) are as follows:

(billions of yen)

	Year ended March 31, 2009	Year ended March 31, 2010	Increase (Decrease)
Value of new business	(19.7)	(18.5)	1.1
Present Value of Premium Income ^(Note1)	366.4	804.5	438.1
New Business Margin	(5.40%)	(2.31%)	3.09 points

(Note 1) Future premium income is discounted by the risk-free rate used for the value of new business calculation.

(Reference) Dai-ichi Life Insurance Company of Vietnam

Dai-ichi Life Insurance Company of Vietnam, Limited (hereinafter "DLVN"), a consolidated life insurance subsidiary in Vietnam, is assumed to have a limited impact on the Group EEV. Accordingly in the EEV calculation process, the Group considers the EV of DLVN calculated using traditional embedded value ("TEV") methodology to be the fair value of Dai-ichi Life's ownership interest, which has been included in the Group's adjusted net worth. The TEV of DLVN as of December 31 is as follows:

(billions of yen)

		December 31, 2008	December 31, 2009	Increase (Decrease)
7	EV	5.7	6.1	0.3
	Adjusted net worth	5.1	5.1	0.0
	Value of in-force business	0.6	1.0	0.3

⁽Note 1) The closing date of DLVN is 31 December, whereas that of Dai-ichi Life and DFL is 31 March. In calculating the Group EEV, the TEV of DLVN as of the most recent closing date is used.

The Group intends to consider the future adoption of EEV-based reporting by its overseas subsidiaries depending on their materiality.

⁽Note 2) The figures were converted into yen at the prevailing exchange rate on the final day in each period (IVND = 0.0052 yen as of December 31, 2008 and IVND = 0.0050 yen as of December 31, 2009).

3. Movement Analysis

3-1 Movement Analysis of Group EEV

(billions of yen)

	Adjusted net worth	Value of in-force business	EEV
Values as of March 31, 2009	1,296.6	461.8	1,758.4
(1) Adjustments to the values as of March 31, 2009	2.1	(0.4)	1.6
Adjusted values as of March 31, 2009	1,298.8	461.3	1,760.1
(2) Value of new business	0	118.9	118.9
(3) Expected existing business contribution (risk-free rate)	3.1	15.5	18.6
(4) Expected existing business contribution (in excess of	14.7	260.2	274.9
risk-free rate)			
(5) Expected transfer from VIF to adjusted net worth	22.0	(22.0)	0
on in-force at beginning of year	167.6	(167.6)	0
on new business	(145.6)	145.6	0
(6) Non-economic experience variances	6.1	0.1	6.2
(7) Non-economic assumptions changes	0	58.4	58.4
(8) Economic variances	518.7	80.1	598.8
Values as of March 31, 2010	1,863.5	972.8	2,836.3

(1) Adjustments to the values as of March 31, 2009

During the fiscal year ended March 31, 2010, Dai-ichi Frontier Life increased ¥20 billion in new capital, of which ¥8.5 billion was paid in by a minority shareholder. Therefore, Dai-ichi Life's ownership interest in EEV of Dai-ichi Frontier Life was diluted accordingly.

(2) Value of new business

The value of new business represents the value at the time of sale, after all acquisition-related costs, attributable to new business obtained during the fiscal year ended March 31, 2010.

(3) Expected existing business contribution (risk-free rate)

In calculating EEV, future expected returns are discounted back using risk-free rates. Thus, the discounted value is assumed to earn the expected return over time. Moreover, this item includes the release for the fiscal year ended March 31, 2010 of time value of financial options and guarantees, cost of holding required capital and allowance for non-financial risks.

(4) Expected existing business contribution (in excess of risk-free rate)

Rates of future expected returns are assumed to be risk-free rates in calculating EEV. However, the Group holds (and will hold) risky assets and expects higher rates of returns on these assets than the risk-free rates. In calculating this item, the Group uses the expected rates of returns described in Appendix B.

(5) Expected transfer from VIF(value of in-force business) to adjusted net worth

The total expected profit during a fiscal year on a statutory accounting basis is transferred to the adjusted net worth. This item includes both the profit expected to emerge from business in force at the start of the reporting period, as well as the expected emergence in adjusted net worth during the fiscal year of statutory losses, including the impact of acquisition costs, and a corresponding increase in the value of in-force business, arising from the new business issued in the fiscal year.

Note that the transferred amounts do not affect the total amount of Group EEV.

(6) Non-economic experience variances

This item represents the difference between (i) the non-economic assumptions, which were used for calculating EEV as of March 31, 2009 and (ii) the actual experience during the fiscal year ended March 31, 2010 corresponding to such assumptions.

(7) Non-economic assumptions changes

This item quantifies the amount of change attributable to increase/decrease in future profits/losses after March 31, 2010 due to changes made to the assumptions.

(8) Economic variances

This item represents the impact of actual to assumed differences in economic assumptions, such as market interest rate and implied volatilities. This item includes the effects on future estimated differences attributable to changes in assumptions.

The main factor in the variances is the increase in adjusted net worth due to the rise in stock prices.

3-2 Movement Analysis by Company

(1) Dai-ichi Life

(billions of yen)

	Adjusted net worth	Value of in-force business	EEV
Values as of March 31, 2009	1,345.8	450.0	1,795.9
Adjustments to the values as of March 31, 2009	0.0	0.0	0.0
Adjusted values as of March 31, 2009	1,345.8	450.0	1,795.9
Value of new business	0	135.6	135.6
Expected existing business contribution (risk-free rate)	2.8	10.6	13.4
Expected existing business contribution (in excess of	14.1	244.9	259.0
risk-free rate)			
Expected transfer from VIF to adjusted net worth	8.1	(8.1)	0
on in-force at beginning of year	156.3	(156.3)	0
on new business	(148.1)	148.1	0
Non-economic experience variances	7.8	0.2	8.0
Non-economic assumptions changes	0	57.3	57.3
Economic variances	502.0	96.5	598.5
Values as of March 31, 2010	1,880.9	987.1	2,868.0

(2) Dai-ichi Frontier Life

	Adjusted net worth	Value of in-force business	EEV
W1 CM 1 21 2000			101.0
Values as of March 31, 2009	109.3	12.5	121.8
Adjustments to the values as of March 31, 2009	20.0	0.0	20.0
Adjusted values as of March 31, 2009	129.3	12.5	141.8
Value of new business	0.0	(18.5)	(18.5)
Expected existing business contribution (risk-free rate)	0.3	5.4	5.7
Expected existing business contribution (in excess of	0.6	17.0	17.6
risk-free rate)			
Expected transfer from VIF to adjusted net worth	15.4	(15.4)	0
on in-force at beginning of year	12.6	(12.6)	0
on new business	2.7	(2.7)	0
Non-economic experience variances	(1,8)	0	(1.9)
Non-economic assumptions changes	0	1.2	1.2
Economic variances	18.4	(18.1)	0.2
Values as of March 31, 2010	162.2	(15.9)	146.3

4. Sensitivity Analysis

4-1 Sensitivity Analysis of Group EEV

The following table shows a sensitivity analysis of Group EEV to changes in assumptions. Although each figure in the table indicates the sensitivity in response to a change in one parameter, it should be noted that the sum of two or more figures in the table do not indicate the sensitivity to a change in two or more parameters corresponding to such figures.

The sensitivities are calculated based on the assumption that the Group's management actions would remain unaffected by changes in parameters.

(billions of yen)

Assumptions	EEV	Increase (decrease)
Values as of March 31, 2010	2,836.3	-
Sensitivity 1: 50bp upward parallel shift in risk-free yield curve	3,182.3	345.9
Sensitivity 2: 50bp downward parallel shift in risk-free yield curve	2,412.0	(424.2)
Sensitivity 3: 10% decline in equity and real estate values	2,515.5	(320.8)
Sensitivity 4: 10% decline in maintenance expenses	2,973.8	137.4
Sensitivity 5: 10% decline in surrender and lapse rate	2,974.2	137.9
Sensitivity 6: 5% decline in mortality and morbidity rates for life insurance products	2,958.4	122.1
Sensitivity 7: 5% decline in mortality and morbidity rates for annuities	2,828.9	(7.3)
Sensitivity 8: Setting required capital at statutory minimum level	2,874.0	37.7
Sensitivity 9: 25% increase in implied volatilities of equity and real estate values	2,807.6	(28.6)
Sensitivity 10: 25% increase in implied volatilities of swaptions	2,824.9	(11.3)

The sensitivities in the above table show the effect on the total EEV but only the Group's value of in-force business is affected in sensitivities 4 through 10. The following table shows the effect on the Group's adjusted net worth of sensitivities 1 through 3.

	Increase (decrease)
Sensitivity 1: 50bp upward parallel shift in risk-free yield curve	(620.0)
Sensitivity 2: 50bp downward parallel shift in risk-free yield curve	584.4
Sensitivity 3: 10% decline in equity and real estate values	(329.2)

Sensitivity analysis of the Group's value of new business

(billions of yen)

Assumptions	Value of new business	Increase (decrease)
Values as of March 31, 2010	118.9	-
Sensitivity 1: 50bp upward parallel shift in risk-free yield curve	149.2	30.2
Sensitivity 2: 50bp downward parallel shift in risk-free yield curve	84.8	(34.1)
Sensitivity 3: 10% decline in equity and real estate values	115.0	(3.8)
Sensitivity 4: 10% decline in maintenance expenses	129.5	10.5
Sensitivity 5: 10% decline in surrender and lapse rate	140.2	21.2
Sensitivity 6: 5% decline in mortality and morbidity rates for life insurance products	122.6	3.6
Sensitivity 7: 5% decline in mortality and morbidity rates for annuities	119.0	0.0
Sensitivity 8: Setting required capital at statutory minimum level	125.4	6.4
Sensitivity 9: 25% increase in implied volatilities of equity and real estate values	106.0	(12.8)
Sensitivity 10: 25% increase in implied volatilities of swaptions	119.1	0.1

• Sensitivity 1

The item represents the effect on EEV of an upward parallel shift of 50bp in the yield curve of risk-free forward rates. As prices of bonds and loans change, the adjusted net worth changes. Also, as future expected investment yields change, the value of in-force business changes.

In accordance with the EEV principles, life insurers are required to disclose their EEV sensitivities to a 100bp shift in the yield curve. However, taking into consideration the low level of interest rates in Japan, we disclosed our sensitivities to a 50bp shift in the yield curve.

• Sensitivity 2

The item represents the effect on EEV of a downward parallel shift of 50bp in the yield curve of risk-free forward rates. The lower limit of the risk-free forward rates is assumed to be zero.

• Sensitivity 3

This item shows the effect on EEV of a decline of 10% in equity and real estate values. Adjusted net worth would be directly affected by the decline. On the other hand, the value of in-force business would also be affected by the decline, as the decline would affect the economic assumption.

• Sensitivity 4

The item represents the effect on EEV of a decrease of 10% in estimated maintenance expenses associated with maintaining in-force business.

Sensitivity 5

The item represents the effect on EEV of a decrease of 10% in surrender and lapse rates.

• Sensitivity 6

The item represents the effect on EEV of a decrease of 5% in mortality and morbidity rates for life and medical insurance products.

• Sensitivity 7

The item represents the effect on EEV of a decrease of 5% in mortality and morbidity rates for annuities.

Sensitivity 8

The item represents the effect on EEV in the event that required capital was changed to the statutory minimum level, a solvency margin ratio of 200%. As items such as policy reserves in excess of surrender values are regarded as admissible assets in the Japanese solvency margin requirement, the cost of holding required capital is not proportional to the level of capital, and the cost to satisfy the statutory minimum level can be nil.

Sensitivity 9

The item represents the effect on EEV of an increase of 25% in the implied volatilities of equity and real estate values. This is because the value of in-force business should change as the time value of financial options and guarantees changes.

• Sensitivity 10

The item represents the effect on EEV of an increase of 25% in the implied volatilities of swaptions. This is because the value of in-force business should change as the time value of financial options and guarantees changes.

4-2 Sensitivity Analysis by Company

(1) Dai-ichi Life

(billions of yen)

Assumptions	EEV	Increase (decrease)
Values as of March 31, 2010	2,868.0	-
Sensitivity 1: 50bp upward parallel shift in risk-free yield curve	3,207.4	339.3
Sensitivity 2: 50bp downward parallel shift in risk-free yield curve	2,451.9	(416.0)
Sensitivity 3: 10% decline in equity and real estate values	2,549.7	(318.3)
Sensitivity 4: 10% decline in maintenance expenses	3,004.4	136.4
Sensitivity 5: 10% decline in surrender and lapse rate	3,007.8	139.7
Sensitivity 6: 5% decline in mortality and morbidity rates for life insurance products	2,990.2	122.1
Sensitivity 7: 5% decline in mortality and morbidity rates for annuities	2,860.5	(7.4)
Sensitivity 8: Setting required capital at statutory minimum level	2,903.9	35.9
Sensitivity 9: 25% increase in implied volatilities of equity and real estate values	2,857.3	(10.7)
Sensitivity 10: 25% increase in implied volatilities of swaptions	2,856.0	(11.9)

The sensitivities in the above table show the effect on the total EEV but only Dai-ichi Life's value of in-force business is affected in sensitivities 4 through 10. The following table shows the effect on the adjusted net worth of sensitivities 1 through 3.

· ·	Increase
	(decrease)
Sensitivity 1: 50bp upward parallel shift in risk-free yield curve	(610.5)
Sensitivity 2: 50bp downward parallel shift in risk-free yield curve	582.8
Sensitivity 3: 10% decline in equity and real estate values	(320.7)

[Unofficial translation]

Sensitivity analysis of Dai-ichi Life's value of new business

	Value of new business	Increase (decrease)
Values as of March 31, 2010	135.6	-
Sensitivity 1: 50bp upward parallel shift in risk-free yield curve	160.1	24.4
Sensitivity 2: 50bp downward parallel shift in risk-free yield curve	107.6	(28.0)
Sensitivity 3: 10% decline in equity and real estate values	135.9	0.2
Sensitivity 4: 10% decline in maintenance expenses	145.3	9.6
Sensitivity 5: 10% decline in surrender and lapse rate	158.2	22.5
Sensitivity 6: 5% decline in mortality and morbidity rates for life insurance products	139.3	3.6
Sensitivity 7: 5% decline in mortality and morbidity rates for annuities	135.6	0.0
Sensitivity 8: Setting required capital at statutory minimum level	140.1	4.5
Sensitivity 9: 25% increase in implied volatilities of equity and real estate values	135.2	(0.4)
Sensitivity 10: 25% increase in implied volatilities of swaptions	135.7	0.0

(2) Dai-ichi Frontier Life

(billions of yen)

	EEV	Increase (decrease)
Values as of March 31, 2010	146.3	1
Sensitivity 1: 50bp upward parallel shift in risk-free yield curve	153.6	7.3
Sensitivity 2: 50bp downward parallel shift in risk-free yield curve	137.1	(9.1)
Sensitivity 3: 10% decline in equity and real estate values	143.5	(2.7)
Sensitivity 4: 10% decline in maintenance expenses	147.5	1.1
Sensitivity 5: 10% decline in surrender and lapse rate	144.2	(2.0)
Sensitivity 6: 5% decline in mortality and morbidity rates for life insurance products	146.3	0.0
Sensitivity 7: 5% decline in mortality and morbidity rates for annuities	146.4	0.1
ensitivity 8: Setting required capital at statutory minimum level 148.3		2.0
Sensitivity 9: 25% increase in implied volatilities of equity and real estate values	126.3	(19.9)
Sensitivity 10: 25% increase in implied volatilities of swaptions	147.0	0.7

The sensitivities in the above table show the effect on the total EEV but only Dai-ichi Frontier Life's value of in-force business is affected in sensitivities 4 through 10. The following table shows the effect on the adjusted net worth of sensitivities 1 through 3.

	emmone or juni
	Increase (decrease)
	(decrease)
Sensitivity 1: 50bp upward parallel shift in risk-free yield curve	(10.5)
Sensitivity 2: 50bp downward parallel shift in risk-free yield curve	1.7
Sensitivity 3: 10% decline in equity and real estate values	(9.4)

Sensitivity analysis of Dai-ichi Frontier Life's value of new business

(billions of yen)

	Value of new business	Increase (decrease)
Values as of March 31, 2010	(18.5)	-
Sensitivity 1: 50bp upward parallel shift in risk-free yield curve	(12.1)	6.4
Sensitivity 2: 50bp downward parallel shift in risk-free yield curve	(25.3)	(6.7)
Sensitivity 3: 10% decline in equity and real estate values	(23.1)	(4.6)
Sensitivity 4: 10% decline in maintenance expenses	(17.6)	0.9
Sensitivity 5: 10% decline in surrender and lapse rate	(20.0)	(1.4)
Sensitivity 6: 5% decline in mortality and morbidity rates for life insurance products	(18.5)	0.0
Sensitivity 7: 5% decline in mortality and morbidity rates for annuities	(18.4)	0.0
Sensitivity 8: Setting required capital at statutory minimum level	(16.4)	2.1
Sensitivity 9: 25% increase in implied volatilities of equity and real estate values	(32.3)	(13.8)
Sensitivity 10: 25% increase in implied volatilities of swaptions	(18.4)	0.1

5. Note on Using EV

In calculating the embedded value of the Group, numerous assumptions (some of which are shown in Appendix B) are required concerning the Group's lines of business with respect to industry performance, business and economic conditions and other factors, many of which are outside the Group's control. Although the assumptions used represent estimates that the Group believe are appropriate for the purpose of embedded value reporting, future operating conditions may differ, perhaps significantly, from those assumed in the calculation of the embedded value. Consequently, the inclusion of embedded value herein should not be regarded as a statement by the Group, Towers Watson or any other entity, that the stream of future after-tax profits discounted to produce the embedded value will be achieved.

Appendix A: EEV Methodology

The methodology and assumptions adopted by the Group to calculate EEV are market-consistent and in accordance with the EEV Principles and related guidance issued by the CFO Forum in May 2004 and further EEV guidance on minimum required disclosures of sensitivities and other items issued by the Forum in October 2005.

Dai-ichi Life is currently a stock company, but it was a mutual company on March 31, 2010. In calculating its EEV, the surplus after policyholder dividends is considered to be the value attributable to the company.

1. Covered Business

The covered business represents all of the life insurance business of the Group (all the businesses and subsidiaries are covered in the EEV calculations).

2. Adjusted Net Worth

Adjusted net worth is calculated by adjusting the total net assets on the company's balance sheet, which is on a mutual company basis, for the following:

- Expected disbursements from capital outside the company are excluded from the adjusted net worth. However, expected shareholder dividends as of March 31, 2010 (¥10.0 billion) are not treated as expected disbursements from capital outside the company, and are not excluded from the adjusted net worth.
- In order to mark to market, differences in market value and book value of assets have been reflected, specifically differences of bonds held to maturity, policy-reserve-matching bonds, loans, land, building, debt and borrowings etc., after adjusting for unrealized gains/losses after tax. For retirement benefits, the sum of unrecognized gains on plan amendments and unrecognized actuarial differences has been used after adjustment for tax.
- Consolidated subsidiaries operating life insurance businesses are treated as follows:
 - Dai-ichi Frontier Life
 - EEV of the company is calculated and included in the Group's EEV.
 - Dai-ichi Life Insurance Company of Vietnam, Limited As the company has a limited impact on Group EEV, its TEV is included in the Group's adjusted net worth as the fair value of Dai-ichi Life's ownership interest.
 - Affiliated companies accounted for under the equity method EEV is not calculated, and differences in market value and book value of assets have been reflected as unrealized gains (losses) in adjusted net worth.
- Liabilities that are appropriate to be added to the adjusted net worth (contingency reserve, reserve for price fluctuations, unallocated portion of reserve for

policyholder dividends, and general reserve for possible loan losses) have been added on an after-tax basis.

3. Value of in-force business

The value of in-force business is calculated as the certainty equivalent present value of projected after-tax profits deducting the time value of financial options and guarantees, cost of holding required capital and allowance for non financial risks.

Future profits for each year are estimated based on the assumption that policy reserves are held on a statutory basis. There are no projected residual assets at the end of the projection period.

With regard to reinsurance, both reinsured and reinsuring parts are reflected.

4. Certainty equivalent present value of future profits

The certainty equivalent present value of future profits is the present value of after-tax profits based on the projected cash flows, calculated on a deterministic basis. All cash flows are discounted at the risk-free rate, assuming the investment yield of all assets is equivalent to the risk-free rate.

The certainty equivalent present value of future profits reflects the intrinsic value of options and guarantees.

5. Time value of financial options and guarantees

The time value of financial options and guarantees is calculated as the difference between (i) the average of the present value of future after-tax profits calculated by stochastic methods where economic assumptions are consistent with current market prices for traded assets, and (ii) the certainty equivalent present value of future profits. Asset allocation is assumed to be the same as the one at the valuation date over the projection periods and any discretion of management in terms of investment strategy is not incorporated.

There are various options in the insurance contracts. The following options and guarantees are considered in calculating the time value of financial options and guarantees of the Group using stochastic methods.

- Participating policies options

When profits arise, policyholder dividends are paid out. On the other hand, when losses arise, the cost of guarantees is not attributed to policyholders. Such asymmetric nature emerges in the net surplus after distribution of policyholder dividends. The value of this option is calculated in the time value of financial options and guarantees by assuming future policyholder dividends along with future profits by stochastic scenarios.

- Minimum guarantees for variable life insurance

When investment performance is good, policyholders will be entitled to the full

amount of the account. On the other hand, when investment performance is poor, an insurance company will bear the cost of guarantees attached to variable life insurance policies. The value of this option is calculated in the time value of financial options and guarantees of the Group

- Minimum interest-rate guarantee for interest rate-sensitive products

When interest rates rise, high interest rates are credited to interest rate-sensitive products. On the other hand, even when interest rates decline, the minimum interest rate is guaranteed in some cases. Such asymmetric nature emerges in future cash flows. The value of this option is calculated in the time value of financial options and guarantees of the Group

- Policyholder behavior

Policyholders have options depending on the movement of financial markets. The cost of selective lapses, such as the lapses based on the "moneyness" in variable annuities or the relation between assumed interest rate and interest rate in saving products, is reflected in the time value of financial options and guarantees of the Group.

6. Cost of holding required capital

This is referred to as "frictional cost" in market-consistent methodology.

In order to secure financial solidity, life insurance companies are required to hold additional assets in excess of the statutory liability. The cost of holding required capital is the cost incurred through the payment of taxes on the investment income of the assets backing the required capital and the related investment expenses incurred for the management of the assets.

The EEV Principles define the minimum required capital to be equal to the statutory minimum capital requirement, and if the required capital calculated by an internal model exceeds the statutory requirement, an internal model may be used. The Group defines required capital as the level required to maintain 600% level of solvency margin ratio. The values of required capital as of March 31, 2009 and March 31, 2010 are ¥893.5 billion and ¥913.5 billion, respectively (free surplus as of March 31, 2009 and March 31, 2010 are ¥403.0 billion and ¥950.0 billion, respectively).

MCEV Principles define required capital as the amount of assets, which is calculated by an internal model and should be held in addition to the assets corresponding to the statutory liability. The Group will continue investigation in reviewing the definition of required capital, taking into account worldwide trends and discussions on economic value based solvency assessment.

7. Allowance for non-financial risks

EEV Principles define the EV to be the present value of distributable profits attributable to shareholders arising from assets allocated to the covered business, calculated taking into account all the risks of the covered business including non financial-risks.

The uncertainty around the return on most non-financial risks can be diversified away. Thus, provided the best estimate assumptions are set to provide the mean expected financial outcome to shareholders, no further allowance for non-financial risk such as mortality is required.

There are some non-financial risks where the existing best estimate experience assumptions do not reflect the mean expected financial outcome to shareholders. These are typically operational risks.

When profits arise, the company pays tax. On the other hand, when losses arise, tax can not be negative. In such cases, carrying losses on a tax accounting basis are collectable in most cases. However, there is a risk of uncollectibility within in the deferrable period.

The Group quantified non-financial risks by a simplified model.

8. Value of new business

The value of new business for the fiscal year ended March 31, 2010 is the value of new policies issued during the 12 month period, and is calculated by the same method as the value of in-force business. The value of new business is the value at the time of sale of new policies. The profit during the fiscal year ended March 31, 2010 from new business is calculated based on the same assumptions used for the value of in-force business.

For Dai-ichi Life, the value of new business is calculated at the end of the fiscal year, based on economic and non-economic assumptions as of the end of the fiscal year.

For DFL, the value of new business is calculated separately for the new business acquired during the 1st and the 2nd half of the fiscal year, based on economic and non-economic assumptions as of the end of each period.

In addition to the new policies, net increases in conversions and addition of riders have been included in the value of new business, while renewal of policies is not included. With regard to the corporate insurance, such as group insurance, corporate pension and workers compensation insurance, the increase of the proportion underwritten by an insurance company in a group scheme, the increase of members in a group scheme and the increase of the sum insured by members in a group scheme are included. This definition of the new business is consistent with statutory financial reporting except for the corporate insurance.

Appendix B: Principal EEV Assumptions

1. Economic assumptions

(1) Risk-free rate

In the certainty equivalent calculation, the Japanese Government Bond (JGB) is used as a proxy for risk-free rates, taking assets in the Group's portfolio and the liquidity in the market into account.

We will continue to examine which rate should be applied as a proxy for risk-free rate, taking the ongoing discussion in Europe including those in the CFO Forum into account. The table below shows, for selected terms, the risk-free rates (spot rates) which are used in the calculations.

Term	March 31, 2009	March 31, 2010
1 Year	0.328%	0.108%
2 Year	0.418%	0.157%
3 Year	0.555%	0.289%
4 Year	0.698%	0.416%
5 Year	0.811%	0.575%
10 Year	1.416%	1.454%
15 Year	1.869%	2.024%
20 Year	2.074%	2.338%
25Year	2.157%	2.418%
30Year	2.199%	2.444%

(Source: Bloomberg, after interpolation)

We assumed that forward rates in the 31st year and beyond were equal to those in the 30th year.

(2) Principal dynamic assumption

i. Interest rate model

As an interest rate model, the Group has adopted a single-factor Hull-White model, in which interest rates associated with Japanese yen, U.S. dollars, Euro and British pounds are calculated. The model has been adjusted to be in line with a risk-neutral approach in which Japanese yen is set as a base currency, and correlations between the interest rates have been also taken into account. The interest rate model has been calibrated consistently with the market environment as of each reporting date, and parameters used are estimated from the yield curve and implied volatilities of interest rate swaptions with various maturities. 5,000 scenarios are used in calculating time value of financial options and guarantees through stochastic method. These scenarios have been generated by Towers Watson.

Summary of implied volatilities of interest rate swaptions used to calibrate the scenarios are as follows:

Interest rate swaptions

		March 31, 2009			March 31, 2010				
Option	Swap	JPY	USD	EUR	GBP	JPY	USD	EUR	GBP
Term	Term	JP1	USD	LUK	UDF	J1 1	USD	LUK	ODL
5Year	5Year	29.7%	26.9%	17.5%	15.8%	27.3%	21.0%	16.4%	14.9%
5Year	7Year	27.4%	25.9%	17.7%	15.3%	25.2%	20.2%	16.0%	14.3%
5Year	10Year	25.2%	25.0%	17.5%	14.7%	23.6%	19.2%	15.9%	13.5%
7Year	5Year	25.1%	24.3%	16.0%	13.2%	23.1%	19.1%	14.6%	13.1%
7Year	7Year	23.8%	23.6%	15.9%	13.0%	22.2%	18.4%	14.6%	12.7%
7Year	10Year	22.3%	23.4%	15.9%	12.9%	21.6%	17.8%	14.9%	12.5%
10Year	5Year	22.0%	21.6%	14.5%	11.0%	20.9%	16.6%	13.6%	11.6%
10Year	7Year	21.0%	21.7%	14.7%	11.2%	20.7%	16.3%	13.8%	11.5%
10Year	10Year	20.0%	21.7%	15.2%	11.8%	20.6%	16.0%	14.4%	11.7%

(Source: Bloomberg)

ii. Implied volatilities of equities and currencies

Volatilities of traditional equity indices and currencies are calibrated based on implied volatilities of relevant options traded in the market. Implied volatilities used to calibrate the scenarios are as follows:

Stock Options

	Underlying	Option	Volatility			
Currency	Asset	Term	March 31, 2009	March 31, 2010		
JPY	Nikkei 225	3Year	34.3%	21.5%		
		4Year	34.1%	21.9%		
		5Year	33.9%	22.1%		
USD	S&P 500	3Year	34.9%	21.2%		
		4Year	34.8%	22.5%		
		5Year	34.8%	23.6%		
EUR	EuroStoxx 50	3Year	33.3%	21.7%		
		4Year	32.7%	21.9%		
		5Year	32.3%	22.3%		
GBP	FTSE 100	3Year	31.2%	19.9%		
		4Year	30.8%	20.2%		
		5Year	30.7%	20.5%		

(Source: Investment Bank)

Currency Options

currency options						
C	Option	Volatility				
Currency	Term	March 31, 2009	March 31, 2010			
USD	10Year	13.3%	18.1%			
EUR	10Year	22.0%	20.3%			
GBP	5Year	24.1%	-			
	10Year	-	17.5%			

(Source: Bloomberg)

iii. Volatilities of real estate and other asset classes

Market-consistent implied volatilities have not been observed with regard to real estate. Therefore, the volatility of real estate has been derived by multiplying the historical volatility ratio(112.5%) of Tokyo Stock Exchange REIT index to TOPIX (Tokyo Stock Exchange Stock Price Index) by the implied volatility of Japanese equity.

In addition, foreign real estate and emerging equity/bond markets are modeled as an asset class in stochastic calculation for variable type products. Volatilities of those asset classes have been derived in the same manner.

iv. Correlations

In addition to implied volatilities described above, Dai-ichi Life has calculated implied volatilities reflecting its asset portfolio and correlation factors. The share of each asset is assumed to be unchanged over the projection periods.

With regard to correlation factors, market-consistent data from exotic options with sufficient liquidity have not been observed in the market. Therefore, we estimated correlation factors based on historical market data. Specifically, the monthly data from January 2001 to most recent have been used. The following table shows correlation factors between major variables.

	Short Rate /JPY	Short Rate /USD	Short Rate /EUR	Excha nge Rate /USD	Excha nge Rate /EUR	Stock Index /JPY	Stock Index /USD	Stock Index /EUR	REIT Index /TSE REIT Index
Short Rate /JPY	1.00	0.31	0.33	0.16	0.07	0.34	0.14	0.14	0.18
Short Rate /USD	0.31	1.00	0.79	0.40	0.12	0.37	0.41	0.50	0.18
Short Rate /EUR	0.33	0.79	1.00	0.33	0.22	0.39	0.48	0.51	0.29
Exchange Rate /USD	0.16	0.40	0.33	1.00	0.56	0.35	0.11	0.21	0.21
Exchange Rate /EUR	0.07	0.12	0.22	0.56	1.00	0.42	0.32	0.25	0.38
Stock Index /JPY	0.34	0.37	0.39	0.35	0.42	1.00	0.65	0.65	0.65
Stock Index /USD	0.14	0.41	0.48	0.11	0.32	0.65	1.00	0.90	0.59
Stock Index /EUR	0.14	0.50	0.51	0.21	0.25	0.65	0.90	1.00	0.57
REIT Index /TSE REIT Index	0.18	0.18	0.29	0.21	0.38	0.65	0.59	0.57	1.00

(Source: Bloomberg)

(3) Assumed investment yield on each asset used for the expected return calculation Assumed investment yield on each asset used for the calculation of "Expected existing business contribution (in excess of risk-free rate)" in "3. Movement Analysis" is as follows:

	Assumed investment yield
Cash and deposits, call loans	0.10%
Fixed income assets	1.73%
Domestic stocks	3.35%
Foreign bonds	3.35%
Other assets	1.24%
Total	1.97%

(Note 1) Figures above are the same as those used in calculating the TEV as of March 31, 2009.

The assumed investment yield used for the calculation of "Expected existing business contribution (in excess of risk-free rate)" is calculated by multiplying the share of each asset as of March 31, 2009 by the assumed investment yield of each asset above.

2. Non-economic assumptions

All cash flows (premium, operating expense, benefits and claims, cash surrender value, tax, etc.) are projected applying the best estimate assumptions up to the termination of the policies, by product, referring to past, current and expected future experience.

- Operating expenses

Operating expenses are set based on the experience of Dai-ichi Life and Dai-ichi Frontier Life. The look-through basis is applied in terms of operating expenses of insurance business in the Group.

- For Dai-ichi Life, adjustment is made for one-time expenses which are considered to be non-recurrent in the future. The amount excluded from the expense assumption is ¥14.7 billion (FY2009 figure) which corresponds to the one-time cost for demutualization. At the same time, an adjustment is made for future expenses such as the shareholder management cost, which cannot be set based on company's experience.
- For Dai-ichi Frontier Life, operating expenses are assumed to decrease for a certain period of time, because it has operated for only a short period of time and the improvement of operating efficiency is expected in the future. Therefore, based on future new business and future operating expenses along with the mid-long term business plan, decrease of unit-cost (by 9% per annum on average) for 9 years is assumed.

- Future inflation rate is assumed zero.

- Policyholder dividends

(1) Dai-ichi Life

Policyholder dividend rates are set based on the current dividend policy. It is consistent with the post-demutualization policyholder dividend policy, stated in the plan for demutualization.

Dai-ichi Life revised the policyholder dividend policy for group annuity in the last fiscal year, and this revision is reflected in the EEV calculation.

(2) Dai-ichi Frontier Life

No assumption of policyholder dividend rate is set, as it sells only non-participating policies.

- Effective tax rate

Set based on the most recent effective tax rate for each company (no change from the previous year)

Dai-ichi Life: 36.08%

Dai-ichi Frontier Life: 36.21%

Appendix C: Actuarial Opinion

Dai-ichi Life requested Towers Watson, an independent actuarial firm, to review the calculation of the Group's EEV and obtained the following opinion.

Towers Watson has reviewed the methodology and assumptions used to determine the embedded value results as at March 31, 2010 for Dai-ichi Life Group. The review covered the embedded value as at March 31, 2010, the value of new business issued in fiscal 2009, the analysis of movement in the embedded value during fiscal 2009 and the sensitivities of the embedded value and new business value to changes in assumptions.

Dai-ichi Life, currently a proprietary company, was a mutual company at March 31, 2010, and the embedded value has been calculated as if Dai-ichi Life was already a proprietary company, based on the current policyholder dividend practice and its demutualisation plan.

Towers Watson has concluded that the methodology and assumptions used comply with the EEV Principles. In particular:

- The methodology makes allowance for the aggregate risks in the covered business through Dai-ichi Life's bottom-up methodology as described in Appendix A of this document, which includes a stochastic allowance for financial options and guarantees, and deductions to allow for the frictional cost of required capital and the impact of non-financial risks;
- The operating assumptions have been set with appropriate regard to past, current and expected future experience;
- The economic assumptions used are internally consistent and consistent with observable market data; and
- For participating business, the assumed policyholders' dividend rates, and the allocation of profit between policyholders and assumed shareholders, are consistent with the projection assumptions, established company practice, Dai-ichi Life's demutualisation plan and local market practice.

The methodology and assumptions also comply with the EEV Guidance, with the disclosed exception of showing the sensitivity of a 0.5% change in interest rates (rather than 1%).

[Unofficial translation]

Towers Watson has also reviewed the results of the calculations, without however undertaking detailed checks of all the models, processes and calculations involved. On the basis of our review, Towers Watson is satisfied that the disclosed results have been prepared, in all material respects, in accordance with the methodology and assumptions set out in this disclosure document.

In arriving at these conclusions, Towers Watson has relied on data and information provided by Dai-ichi Life, including estimates for the market value of assets for which no market prices exist. This opinion is made solely to Dai-ichi Life in accordance with the terms of Towers Watson's engagement letter. To the fullest extent permitted by applicable law, Towers Watson does not accept or assume any responsibility, duty of care or liability to anyone other than Dai-ichi Life for or in connection with its review work, the opinions it has formed, or for any statement set forth in this opinion.

Appendix D: Glossary

Allowance for	Explicit cost for asymmetric non financial risks such as			
	Explicit cost for asymmetric non-financial risks such as			
Non-financial Risks	operational risks.			
Best Estimate	An assumption that represents the mean expected			
Assumption	financial outcome to shareholders from the range of			
	possible outcomes for future experience of that			
	assumption.			
Certainty Equivalent	The present value of future statutory after-tax profits,			
Present Value of Future	projected over the life time of the policies in a scenario			
Profits	where all investments are assumed to earn the risk-free rate.			
CFO Forum	The CFO Forum is a high-level discussion group formed			
	and attended by the Chief Financial Officers of major			
	European insurance companies. Its aim is to discuss			
	issues relating to financial reporting developments for			
	their businesses and how they can create greater			
	transparency for investors. The CFO Forum was created			
	in 2002.			
Cost of Holding	The additional investment and taxation costs incurred by			
Required Capital	shareholders through investing required capital in the			
	company rather than directly.			
EEV Principles	European Embedded Value (EEV) Principles were			
EL (Timelpres	published by the CFO Forum in May 2004, together with			
	additional guidance on disclosures in October 2005,			
	addressed the treatment of options and guarantees and			
	provided the insurance industry with improved			
	sensitivities and disclosures.			
Implied Volatility	The implied volatility of an option contract is the			
,	volatility implied by the market price of the option.			
Look-through Basis	A basis via which the impact of an action on the whole			
	group, rather than on a particular part of the group, is			
	measured.			
Market-consistent	A measurement approach where economic assumptions			
Approach	are such that projected asset cash flows are valued			
1 ipprouen	consistently with current market prices for traded assets.			
	consistently with current market prices for traded assets.			

MCEV Principle	The European Insurance CFO Forum Market Consistent
1	Embedded Value Principles (Copyright© Stichting CFO
	Forum Foundation 2008) were published by CFO Forum
	in June 2008 to ensure the valuation to be on a market
	consistent basis and to improve comparability between
	companies. The use of the MCEV Principles was
	intended to be mandatory for EV reporting for all
	members from 2009.
	However, in the light of the recent financial turmoil, the
	MCEV principles were revised in October 2009, in
	particular with regard to the effect of liquidity premia,
	and it was decided to defer mandatory MCEV reporting
	for all members until 2011.
Required Capital	The amount of assets, over and above the value placed on
	liabilities in respect of covered business, whose
	distribution to shareholders is restricted.
Risk-free Rate	Prospective yields on securities to be considered to be
	free of default or credit risk.
Stochastic Method	Techniques that incorporate the potential future
	variability in assumptions affecting their outcome.
Swaption	A swaption is an option giving the holder the right to
	enter into a certain interest rate swap at a certain time in
	the future.
Time Value of Financial	An option feature has two elements of value, the time
Options and Guarantees	value and intrinsic value. Intrinsic value is that of the
	most valuable benefit under the option under conditions
	at the valuation date. Time value is the additional value
	ascribable to the potential for benefits under the option to
	increase in value prior to expiry.