Dear Sirs:

Name of Company: BELLUNA CO., LTD.

Code No. 9997 1st Section of the Tokyo Stock Exchange

Notice of Repurchase of Own Shares from the Market

The Company repurchased its own shares at the market pursuant to Article 210 of Japanese Commercial Code as described below.

1. Period of repurchase: From February 1st to 29th, 2004

2. Number of shares repurchased: 34,900 shares3. Total cost of repurchase: 126,891,500 yen

4. Method of repurchase: Repurchased at the Tokyo Stock Exchange

Note1: Details resolved at the annual shareholders' meeting held on June 27th, 2003

- Type of shares to be repurchased: Common shares

Number of shares to be repurchased: 500,000 shares (maximum)
 Total value of shares to be repurchased: 2,500 million-yen (maximum)

Note2: Total number of shares and cost of the repurchase since the annual shareholders' meeting held on June 27th, 2003 is as follows:

Total number of shares repurchased: 394,000 shares
Total value of shares repurchased: 1,400,357,500 yen