

November 4, 2005

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 Sub-section 2 of Section 1 of Article 211-3 of Japanese Commercial Code as described below.

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|----------------------------------|---|
| 1. Period of repurchase: | From October 1st to 31st, 2005 |
| 2. Number of shares repurchased: | 24,750 shares |
| 3. Total cost of repurchase: | 85,940,500 yen |
| 4. Method of repurchase: | Repurchased at the Tokyo Stock Exchange |

Note1: Details resolved at the Board of Directors' meeting held on July 7th, 2005

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|--|-----------------------------|
| - Type of shares to be repurchased: | Common shares |
| - Number of shares to be repurchased: | 300,000 shares (maximum) |
| - Total value of shares to be repurchased: | 1,000 million-yen (maximum) |

Note2: Total number of shares and cost of the repurchase from July 7th, 2005, when Board of Directors' meeting was held, to October 31st, 2005 is as follows:

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|---------------------------------------|-----------------|
| - Total number of shares repurchased: | 116,800 shares |
| - Total value of shares repurchased: | 378,020,000 yen |

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