

January 7, 2009

Dear Sirs:

Name of Company: BELLUNA CO., LTD.

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

Notice of Enhanced Early Retirement Plan Application

Notice is hereby given that the Company resolved on the application of the enhanced early retirement plan at a meeting of the Board of Directors held on January 6, 2009, as follows.

Description

1. Background

Retail business condition in Japan becomes much severer because of deteriorating employment conditions and sluggish personal consumption following the worldwide economic downturn. Under its “portfolio approach”, the Company Group with origins as a mail order business has expanded its business activities to include, for example, financial and customized client services and real estate business. As of now, the Group operates businesses in six segments, namely the Catalog Business, Single-Item Mail Order Business, Advanced Finance (AF) Business, BOT (Belluna Operation Trust) Business, Property Business, and Other Business. However, there is now greater uncertainty about the business conditions around AF Business and BOT Business which have been growth drivers of the Group’s operating results in recent years. Therefore, the Group has consequently been working to improve profitability by concentrating its corporate resources on mail-order-related businesses, centered on Catalog Business.

After considering the operating results for the second quarter of fiscal year ended March 31, 2009, as announced on October 31, 2008, the Company has been undertaking to restructure its business portfolio by considerably downsizing the businesses which are less related to the mail order business. As a means to achieving fundamental reforms of its business structure, the Company has decided to offer the enhanced early retirement plan as below.

2. Summary of the Plan

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| (1) Eligible employees | Employees enrolled in business section having difficulty in improving its profitability which engages in the “Other Business” segment, as of January 7, 2009 |
| (2) Application numbers | Approximately 40 |
| (3) Application period | From January 7, 2009, to January 23, 2009 |
| (4) Date of retirement | February 15, 2009 |
| (5) Enhanced plan | Offering severance benefits with a premium allowance and job-placement assistance program for early retired employees |

3. Impact upon the operation

The Company will announce the amount and timing of extra-ordinary charges to be incurred in relation to the implementation of the plan as well as the impact on our operation as soon as determined.

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