March 31, 2011

Dear Sirs:

Name of Company: BELLUNA CO., LTD.

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

Notice of Introduction of Executive Officer System and Change in Structure of Officers

Notice is hereby given that the Company resolved to introduce an executive officer system and change the structure of its officers in association with changes in their responsibilities at the meeting of the Board of Directors held on March 31, 2011. Details are as follows:

Description

- 1. Introduction of an executive officer system
- (1) Purpose of introduction

The Company has decided to introduce an executive officer system to increase management efficiency and accelerate decision-making, while bolstering the corporate governance system by clarifying responsibilities for business execution.

- (2) Outline of the system
 - (i) The executive officers shall have the authority to execute operations under their responsibility, based on the policies determined by the Board of Directors, and shall be responsible for the execution.
 - (ii) The Board of Directors shall determine the appointment and dismissal of executive officers and their responsibilities.
 - (iii) The term of office of the executive officers shall be one year.
- (3) Timing of the introduction April 1, 2011

2. Change in the structure of officers (as of April 1, 2011)

Name	New title	Current title
Kiyoshi Yasuno	President and CEO	President and CEO
Yuichiro Yasuno	Director and Executive Officer	Director
	General Manager of New Business Div.,	General Manager of Solution Div.
	General Manager of Solution Div.	
Yasutaka Nomura	Director and Executive Officer	Director
	General Manager of Network System Div.,	General Manager of Network System Div.,
	General Manager of E-Commerce Div.,	General Manager of E-Commerce Div.
	General Manager of Data Process Div.	

Disclaimer: This is an English translation of the captioned release. This translation is prepared and provided for the purpose of the reader's convenience. All readers are recommended to refer to the original version in Japanese of the release for complete information.

BELLUNA

Name	New title	Current title
Junko Shishido	Director and Executive Officer	Director
	General Manager of President's Office	In charge of Planning
Takeo Shimano	Director and Executive Officer	Senior Managing Director
	General Manager of Executive Corporate	General Manager of Finance Business Div.,
	Planning Dept.	Division Manager of Funds
Masakazu Oikawa	Director and Executive Officer	Director
	General Manager of Planning Div.	General Manager of Planning Div.
Toshio Takahashi	Director and Executive Officer	Director
	General Manager of Quality Management Div.,	General Manager of Order Reception Div.,
	General Manager of Order Reception 2 Div.	General Manager of Data Process Div.
Shigeru Sudou	Director	Director
		General Manager of Administration Div.,
		Division Manager of Procurement
		Administration Div.
Masato Yamauchi	Executive Officer	General Manager of General Affairs Div.
	General Manager of General Affairs Div.	
Tomohiro Matsuda	Executive Officer	General Manager of Executive Corporate
	General Manager of Administration Div.	Planning Dept.
Yuuki Katayama	Executive Officer	Division Manager of Marketing Div.
	General Manager of Marketing Div.	
Atsushi Morita	Executive Officer	General Manager of Distribution Div.
	General Manager of Distribution Div.	
Yoshihisa Hasumi	Executive Officer	On loan to Sunstage Co., Ltd.
	General Manager of Finance Business Div.	
Hideshi Shimokawa	Executive Officer	Deputy General Manager of Planning Div.
	Deputy General Manager of Planning Div.	

^{*}Director Shigeru Sudou will resign his position for personal reasons on May 15.