

(Excerpt translation)

March 19, 2002

Dear Sirs:

Name of Company: BELLUNA CO., LTD.

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

Notice of Issuance of Unsecured Convertible Bonds

Notice is hereby given that at the meeting of the Board of Directors of the Company held on March 19, 2002, it was resolved that unsecured convertible bonds be issued, as described below:

Description

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|--------------------------------|--|
| 1. Name of issue: | Belluna Co., Ltd. The 2nd Unsecured Convertible Bonds
With 120% Call Option |
| 2. Total amount of issue: | ¥ 5 billion |
| 3. Face Value of each Bond: | ¥ 1 million |
| 4. Form of the Bonds: | Bearer form |
| 5. Interest: | Not yet decided |
| 6. Issue price: | ¥ 100 per ¥ 100 in face value |
| 7. Redemption amount: | ¥ 100 per ¥ 100 in face value |
| 8. Redemption at maturity: | March 30, 2007 |
| 9. Offering period: | Not yet decided |
| 10. Payment date: | April 15, 2002 |
| 11. Methods of offering: | Public Offering |
| 12. Particulars of Conversion: | |
| (2) Conversion price: | Not yet decided |

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