

**CODE OF PRACTICES AND PROCESS FOR FAIR DISCLOSURE OF
UNPUBLISHED PRICE SENSITIVE INFORMATION**

1. Corporate Disclosure Policy - To ensure timely and adequate disclosure of price sensitive information, the following norms shall be followed by the Company.
2. Prompt disclosure of price sensitive information:

Price sensitive information shall be given by the Company to stock exchanges and disseminated on a continuous and immediate basis. The Company will also consider ways of supplementing information released to stock exchanges by improving investor access to their public announcements.
3. Overseeing and co-ordinating disclosure:
 - 3.1 The Company has designated the Company Secretary to oversee corporate disclosure.
 - 3.2 He shall be responsible for ensuring that the Company complies with continuous disclosure requirements, overseeing and co-ordinating disclosure of price sensitive information to stock exchanges, shareholders and educating staff on disclosure policies and procedure.
 - 3.3 Information disclosure/dissemination may normally be approved in advance by the official designated for the purpose.
 - 3.4 If the information is accidentally disclosed without prior approval, the person responsible may inform the designated officer immediately, even if the information is not considered price sensitive.
4. Responding to market rumours – The Official designated for corporate disclosure shall be responsible for deciding whether a public announcement is necessary for verifying or denying rumours and then making the disclosure.
5. The Official designated for corporate disclosure shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information (UPSI). The proceedings of meetings with analysts and other investor relation conferences shall be placed on the official website of the Company.
6. Medium of disclosure/dissemination: The Company shall disseminate all credible and concrete UPSI on a continuous and in a timely manner to Stock Exchanges where its securities are listed in accordance with the requirements of applicable law.
7. As a good corporate practice, the UPSI disclosed to the Stock Exchanges may also be supplemented by prompt updates on the Company's web-site. The Company may also consider other modes of public disclosure of UPSI so as to improve investor access to the same.

For WINTAC LIMITED



R. P. Myagaraj
CYP (Finance) & Secretary