

Insider Trading and Disclosure Policy ("ITDP")

PELATRO LIMITED

Introduction

Set out in this document is Pelatro Limited's (Company) policy on trading in securities (the "ITDP"). This ITDP applies to members of the board of the Company (the "Board") and to all employees, including that of the subsidiaries ("Restricted Persons"). The purpose of the ITDP is to minimise risk that employees place themselves in a position where they could, often with the benefit of hindsight, be suspected of taking advantage of inside information that they may be thought to have, especially in periods leading up to the announcements of results.

If the ITDP does apply to you, you must understand that your freedom to trade in securities (including in particular, the Company's securities) is restricted in a number of ways - not only by the relevant law (for example, LODR, PIT) or restrictions in a Director's service agreement, but also by the ITDP. It is an offence to encourage insider dealing and to disclose inside information with a view to others profiting from it.

Scenarios

(a) Insider trading

Insider trading arises where a person possesses inside information and uses that information while acquiring or disposing of (for its own account or for the account of a third party), directly or indirectly, financial instruments to which that information relates. This includes recommending that another person engage in insider trading, or inducing another person to engage in insider trading on the basis of that inside information.

(b) Unlawful disclosure of inside information

This behaviour arises where a person possesses inside information and discloses that information to any other person, except where the disclosure is made in the normal exercise of an employment, a profession or duties. When such information is used to trade in the securities of the Company, the result is insider trading.

(c) Market manipulation

Behaviour amounts to market manipulation or attempted market manipulation where, amongst other situations, a person does anything that gives, or is likely to give, false or

misleading signals as to the supply of, demand for, or price of, a financial instrument. This includes entering into a transaction or trade, giving information to the media, or otherwise transmitting false or misleading information.

Encouraging someone else to engage in any of the above is also an offence. The offence applies to any person, both corporates and individuals and mere intention itself is an offence as no transaction is required for the offence to apply.

Rules and Restrictions

1. All Restricted Persons must always seek advice from the Company's Company Secretary and Compliance Officer. For example, a trading which may fall outside the ITDP might still need to be disclosed to the Company. So, the rule stipulated is for any entity to consult with the Company's Company Secretary and Compliance Officer and obtain appropriate approval prior to dealing in the securities of the Company, at any point in time. It is emphasized that no Restricted Person should ever trade in the securities of the Company without obtaining the written approval of the Company's Company Secretary and Compliance Officer
2. Breaches of ITDP will be considered serious and could lead to disciplinary action.
3. Failure by any Restricted Person to observe and comply with its requirements may result in disciplinary action. Depending on the circumstances, such non-compliance may also constitute a civil and/or criminal offence.
4. Close Period: This is the (a) period of 60 days prior to the release or announcement of the financial results of the Company; (b) period of 60 days prior to the release or announcement of any price sensitive information and (c) any period, that the Board in its absolute discretion, declares as a Close Period.
5. Any information about the Company and its operations that is not available in the public domain is considered as inside information. Disclosure of all such information, except in the normal course of business and to entities who need that information to engage with the Company in mutual interest, is prohibited by ITDP. The list of personnel to whom unlawful disclosure should not be made to includes family, friends and business acquaintances of any Restricted Person.

6. While being in possession of such inside information, Restricted Persons are strictly prohibited from trading the securities of the Company.
7. If you have any question about the ITDP please speak to the Company Secretary and Compliance Officer.