

**Adopted by the Directors
of GLOBALTRANS INVESTMENT LTD**

Resolution of 24 January 2008

**GLOBALTRANS INVESTMENT LTD
DISCLOSURE POLICY**

TABLE OF CONTENTS

1. INTRODUCTION.....2

2. PURPOSE2

3. APPLICATION.....2

4. TERMS AND DEFINITIONS2

5. DISCLOSURE INFORMATION.....2

6. PUBLIC ANNOUNCEMENTS3

7. DELAY THE PUBLIC DISCLOSURE3

8. AUTHORIZED SPOKESPERSONS3

9. CONTROL OF INSIDE INFORMATION3

10. EQUAL RIGHT TO INFORMATION AND TREATMENT3

11. FINANCIAL CALENDAR3

12. PUBLICATION OF INFORMATION ON GTI'S INTERNET SITE4

13. DEALING WITH RUMOURS.....4

14. CLOSE PERIODS4

15. LANGUAGE.....4

16. REVISION OF DISCLOSURE POLICY4

1. INTRODUCTION

In accordance with the United Kingdom Listing Authority Rules and needs of Globaltrans Investment Ltd (hereinafter GTI, or the Company), the Company establishes the basic rules and procedure for full disclosure of corporate information to inform all stakeholders in the securities market about the Company's business on a timely basis.

2. PURPOSE

The purpose of the Disclosure Policy is to:

- provide prompt, fair and timely disclosure of relevant information to the market in compliance with applicable regulatory requirement, ensuring that all stakeholders have equal opportunities to receive externally available information issued by GTI;
- raise additional awareness and focus management and employees on, applicable requirements and practices;
- provide guidance and structure in disseminating corporate information to, and in dealing with, investors, analysts, media representatives and the public;
- set out specific circumstances when the Company can delay public disclosure of inside information and requirements to ensure that such information is kept confidential in order to protect investors and prevent insider dealing.

3. APPLICATION

This Policy applies to:

- any written document or material (produced for either internal or external purposes) including, but not limited to, press releases, press notices, company brochures, employee magazines or newsletters, publications in industry or other publications;
- any oral communications (such as, but not limited to, press interviews, press conferences, internal presentations or presentations at industry or other conferences);
- any audio visual media (such as corporate video, television or radio spots or interviews, slides and other visual aides used at conferences, meetings and events).

4. TERMS AND DEFINITIONS

Inside information - information of a precise nature which is not generally available, relates, directly or indirectly, to one or more issuers of investments or to one or more relevant investment, and would, if generally available, be likely to have a significant effect on the price of the investments or on the price of related investments;

FSA – Financial Service Authority;

RIS (Regulated Information Service) – service, which is approved by the FSA as meeting the Criteria for Regulated Information Services and that is on the list of Regulated Information Services maintained by the FSA.

5. DISCLOSURE INFORMATION

GTI immediately notifies the market of information, via appropriate RIS, which is likely to be used by an investor as part of the basis of his investment decisions and would therefore be likely to have a significant effect on the price of GTI's financial instruments.

The information is considered relevant to investors if it affects:

- assets and liabilities of the Company;
- performance, or the expectation of the performance of the Company's business;
- financial position of the Company;
- course of the Company's business;
- major new developments in the business of the Company;
- information previously disclosed to the market.

All inside information subject to public disclosure shall be preliminary considered by the Board of Directors of GTI.

6. PUBLIC ANNOUNCEMENTS

GTI strives to disclose inside information as soon as possible. If the Company is faced with an unexpected and significant event, a short delay may be acceptable if it is necessary to clarify the situation.

In such situations a public announcement shall be made where GTI believes that there is a danger of inside information leaking before the facts and their impact can be confirmed. The public announcement shall:

- detail as much of the subject matter as possible;
- set out the reasons why a fuller announcement cannot be made; and
- include an undertaking to announce further details as soon as possible.

If the Company is in any doubt as to the timing of announcements, it shall consult the FSA.

7. DELAYING THE PUBLIC DISCLOSURE

The Company may, under its own responsibility, delay the public disclosure of inside information, such as not to prejudice its legitimate interests provided that:

- such omission would not be likely to mislead the public;
- any person receiving the information shall be informed of a duty of confidentiality to GTI, regardless of whether such duty is based on law, regulations or contract;
- the Company is able to ensure the confidentiality of that information.

8. AUTHORIZED SPOKESPERSONS

The Company keeps the list of spokespersons, which is regularly updated. Spokespersons are authorized to make any public statement on behalf of, or attributable to GTI. GTI's authorized persons interact regularly with the market in a variety of ways, including results briefings, market announcements, one-on-one briefings, meetings and educational sessions.

At all times when interacting with external individuals, investors, stockbroking analysts, market participants and financial journalists, GTI adheres to the guiding principle set out in this policy.

9. CONTROL OF INSIDE INFORMATION

GTI shall maintain effective arrangements to deny access to inside information to persons other than those who require it for the exercise of their functions within the Company.

10. EQUAL RIGHT TO INFORMATION AND TREATMENT

GTI understands that all inside information which is communicated by the Company to certain addressees needs in principle to be communicated to all categories of in all jurisdictions and, to the extent possible, at the same time. GTI shall ensure equality of treatment for all security holders.

The Company ensures that the business decisions are taken based on the same information provided to the market.

GTI takes reasonable care to ensure that the disclosure of inside information to the public is synchronized as closely as possible in all jurisdictions in which it has:

- financial instruments admitted to trading on a regulated market;
- requested admission to trading of its financial instruments on a regulated market.

11. FINANCIAL CALENDAR

GTI follows a calendar of regular disclosure to the market on its financial and operational results. The calendar, posted on the Company's internet site, includes target dates for the release of full year results, other financial information, shareholder meetings, business briefings and GTI's involvement in major investment conferences.

12. PUBLICATION OF INFORMATION ON GTI'S INTERNET SITE

All inside information announced, via an appropriate RIS, is available on the GTI's internet site by the close of the business day following the day of the RIS announcement.

13. DEALING WITH RUMOURS

Where there is a press speculation or market rumour regarding GTI, the Company carefully assesses whether the speculation or rumour has given a rise to a situation where there was any information leakage. In this case the Company can no longer delay disclosure in accordance with the criteria stated in paragraph 7. Delay the public disclosure, as it is no longer able to ensure the confidentiality of the inside information. The Company shall prepare a public announcement to be disclosed in the event of an actual or likely breach of confidence.

14. CLOSE PERIODS

GTI observes a series of close periods throughout the year to protect against inadvertent disclosure of material information.

During these periods GTI will not make any comment on analysts' earnings estimates other than acknowledging the range and average estimates in the market, neither comment on the financial performance of GTI unless the information has already been released to the market.

The close periods are periods between the end of each financial year and the preliminary announcement of the full year results.

15. LANGUAGE

Regulated information shall be disclosed in English.

16. REVISION OF DISCLOSURE POLICY

This Policy is subject to periodical review to allow it to take into account any regulatory changes.