



3 February 2011

Patrick O'Connor
Senior Advisor, Listings
Australian Stock Exchange
PO Box 7055
Riverside Centre
Brisbane QLD 4001

Dear Sir,

SHARE TRADING POLICY

In reference to your letter dated 1 February 2011 the Company responds as follows:

1. The non-disclosure of the Company's share Trading Policy was an oversight; and
2. The Share trading policy is attached.

Yours faithfully
WINTECH GROUP LIMITED

A handwritten signature in black ink that reads "T. Kelly". The signature is written in a cursive, flowing style.

TREVOR KELLY
Director



ASX Markets Supervision Pty Ltd
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Brisbane QLD 4000

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1 February 2011

Mr Trevor Kelly
Director
Witech Group Limited
Suite 304, 22 St Kilda Road
ST KILDA VIC 3182

By email: tkelly@witechgroup.com.au; info@witechgroup.com.au

Dear Mr Kelly

Witech Group Limited (the "Company") – Trading Policy Disclosure

We refer to the following.

1. Listing rule 12.9, effective from 1 January 2011, which states as follows:
An entity must have a trading policy that complies with the requirements of ASX listing rule 12.12. An entity must give its trading policy to the company announcements office for release to the market.
2. Listing rule 12.12, effective from 1 January 2011, which states as follows:
At a minimum, an entity's trading policy must include the following information:
 - 12.12.1 *The entity's closed periods.*
 - 12.12.2 *The restrictions on trading that apply to the entity's key management personnel.*
 - 12.12.3 *Any trading which is not subject to the entity's trading policy.*
 - 12.12.4 *Any exceptional circumstances in which the entity's key management personnel may be permitted to trade during a prohibited period with prior written clearance.*
 - 12.12.5 *The procedures for obtaining prior written clearance for trading under rule 12.12.4.*
3. *Guidance Note 27 – "Trading Policies"*, which was published to assist listed entities to comply with their obligations under listing rules 12.9, 12.10 and 12.12.
4. The Companies Update dated 13 August 2010, notifying listed entities of their obligation to comply with the requirements in listing rules 12.9 and 12.12, effective from 1 January 2011.
5. The Companies Update dated 9 December 2010, reminding listed entities of their obligation to comply with the requirements in listing rules 12.9 and 12.12, effective from 1 January 2011.

ASX Limited ("ASX") attaches particular importance to encouraging a consistently high standard of listed entities' disclosure in respect of trading policies.



Our records indicate that, despite the reminders mentioned above, the Company has not yet lodged with ASX a trading policy in compliance with listing rules 12.9 and 12.12.

ASX notes that the Company has been suspended since 1 June 2009. ASX reminds the Company of its contract with ASX to comply with the listing rules. This obligation is not affected by the suspension of the Company's securities from trading (see listing rule 18.6).

In the circumstances ASX requires the Company to answer the following questions:

1. Please explain why the Company has not lodged a trading policy with ASX.
2. Please advise when the Company expects to lodge a trading policy with ASX in compliance with listing rules 12.9 and 12.12.

Your response should be sent to me by e-mail at patrick.oconnor@asx.com.au or by facsimile on facsimile number (07) 3832 4114. It should not be sent to the Company Announcements Office.

A response is requested as soon as possible and, in any event, not later than half an hour before the start of trading (i.e. **before 8.30 a.m. A.E.T.**) on **Friday, 4 February 2011**.

Under listing rule 18.7A, a copy of this query and your response will be released to the market, so your response should be in a form suitable for release and should separately address each of the questions asked.

ASX notes that the suspension in quotation of the securities of the Company will continue until the listed entity releases to the market a trading policy that is compliant with the listing rules. This is in addition to any other requirements that the Company must meet for reinstatement to quotation.

Please note that ASX Compliance has discretion not to reinstate a listed entity should it fail to comply with the listing rules, the spirit of the listing rules or be unable to disclose information to the market as requested by ASX or required by listing rule 3.1.

If you have any queries about this letter, please contact me immediately.

Yours sincerely,

A handwritten signature in black ink that reads 'Pat O'Connor'.

Patrick O'Connor

Senior Adviser, Listings (Brisbane)