



Wisconsin Capital Funds, Inc. (“Plumb Funds”, or the “Funds”)

Disclosure of Portfolio Holdings Policy

102.1 Overview

Information about the portfolio holdings of the Funds is generally considered to be relevant and significant to persons in deciding to buy or sell shares of the Funds. Such information should be safeguarded as material, non-public information until publicly disclosed as approved by the Funds. The Funds have adopted this Disclosure of Portfolio Holdings policy to provide reasonable assurance that information related to the underlying portfolio holdings remains confidential until such time as it may be released publicly, consistent with the provisions of this policy.

Other than as described within the policy or as required by law, no person associated with the Funds, Wisconsin Capital Management, LLC (“WisCap”) or any other service provider to the Funds shall disclose any information regarding portfolio holdings of any Fund. Questions regarding this policy should be directed to the Chief Compliance Officer (“CCO”) of the Funds, or his/her designee.

102.2 Authorized Public Disclosures

Within 30 days of quarter-end, the Funds shall post on its website a complete schedule of the securities and investments owned as of the end of each fiscal quarter. This posting will be made within 30 days after the end of the relevant fiscal quarter, and shall identify the Funds' securities or investments and the percent of the Funds' portfolio made up by such securities or investments at the end of the quarter. Information regarding Fund holdings (including Fund Fact Sheets) may not be publicly disseminated or communicated until this posting is made.

The Funds shall also disclose investments of the Funds as required by the Investment Company Act of 1940 (the "Investment Company Act"), including within the semi-annual and annual reports to shareholders and other required filings.

Fund representatives should refer persons who seek information on portfolio holdings to the complete schedule of the securities and investments owned by the Funds available at the SEC's website or to information that is posted on the Funds' website, or the Funds may deliver a copy of the annual or semi-annual report to them.

102.3 Permissible Disclosure

- A. Notwithstanding the prohibitions above, a Funds' portfolio holdings may be disclosed to:



1. A recognized rating or ranking agency such as Morningstar or Lipper for its use in developing a rating for the Fund or in evaluating the category in which the Fund should be placed;
 2. A Director of the Funds in connection with Board meetings;
 3. Broker-dealers who have selling agreements with the Funds and who agree not to share such information with their clients; and
 4. To other such parties upon advanced approval of the Board of Directors, including the majority of Directors who are not “interested persons”, if the dissemination of such information is deemed to be in the best interests of Fund shareholders and is not deemed to be in violation of applicable securities laws.
- B. Information about a Fund's portfolio holdings may be disclosed by the Funds':
1. Advisor;
 2. Sub-advisor (if applicable);
 3. Distributor;
 4. Administrator;
 5. Accounting/pricing agent;
 6. Transfer agent;
 7. Custodian;
 8. Counsel;
 9. Independent auditors; and
 10. Other service providers only to the extent required by law or, to the extent necessary to enable such service providers to carry out their specific duties, responsibilities and obligations to the Fund.
- C. In addition, the President or CCO of the Funds (or their designees) may disclose to a newspaper, magazine or television, cable or radio program that a Fund owns a particular security or securities within a particular industry, sector or market capitalization, but may not disclose:
1. The number of shares or principal amount owned;
 2. The percentage that any such position represents in the Funds or in the issuer of such securities; and
 3. That the Fund is considering the purchase or sale of any security.

102.4 Oversight and Reporting

The Funds' CCO shall be responsible for overseeing this Policy and for obtaining reasonable assurance that all appropriate parties are aware of their responsibilities under this Policy. The CCO shall incorporate the above matters into his/her routine due diligence reviews and general oversight of all applicable service providers.

The CCO shall report on compliance with this policy to the Board of Directors on at least an annual basis, including instances where portfolio holdings information was provided



to third parties in contradiction to this Policy and, if so, to whom and under what circumstances such information was provided.

Final: April 2008

Executive Committee: April 2008

Revised: September 1, 2010