MONETTA TRUST
(the "Fund")
Policies and Procedures Relating to Selective Disclosure of Portfolio Holdings

A. Background

Pursuant to the requirements of the Securities Act of 1933, as amended, and the Investment Company Act of 1940, as amended (the "1940 Act"), the Funds have filed a registration statement on Form N-1A with the Securities and Exchange Commission (the "SEC"). Form N-1A requires the Funds to disclose in its prospectus and statement of additional information certain information about its policies and procedures with respect to the disclosure of its portfolio securities and any ongoing arrangements to make available information about its portfolio securities. The following policies and procedures describe the circumstances under which the Funds and its investment advisers and/or its administrator (collectively, the "Service Providers") may disclose information about the Funds' portfolio securities. Notwithstanding such policies and procedures, any disclosures of the Funds' portfolio securities must be consistent with the antifraud provisions of the federal securities laws and the fiduciary obligations of the Funds and the Service Providers.

B. Policies and Procedures

1. Disclosure of Portfolio Holdings. The principal Service Provider responsible for dissemination of information about the Funds' portfolio securities is Monetta Financial Services, Inc. ("MFSI") in its capacity as investment adviser. The Funds and their Service Providers shall only disclose information concerning securities held in the Funds' portfolios under the following circumstances:

a. The Funds disclose their calendar quarter-end portfolio holdings on their website generally within 15 calendar days after the end of each quarter. The Funds also disclose their top ten holdings on their website generally within 15 calendar days after the end of each calendar quarter. The top ten holdings and quarter-end portfolio schedules will remain available on the Funds' website at least until it is updated for the next quarter, or until the Fund files with the SEC its semi-annual or annual shareholder report on Form N-Q.;

(ii) The Funds or a Service Provider may disclose the Funds' portfolio securities holdings to selected third parties when the Funds have a legitimate business purpose for doing so;

Examples of instances in which selective disclosure of the Funds' portfolio securities may be appropriate include disclosure for due diligence purposes to an investment adviser that is in merger or acquisition talks with the Funds' investment advisers; disclosure to a newly hired investment adviser or sub-adviser prior to its commencing its duties.

Nothing in this Policy is intended to prevent the disclosure of any and all portfolio holdings information to the Funds' service providers who generally need access to such information in the performance of their contractual duties and responsibilities, including disclosure to third party service providers of advisory, distribution, Fund Trustees, Directors of the Adviser, custody, fund accounting, sub-administration, independent public accountants, attorneys, proxy voting and other services to the Funds; or disclosure to a rating or ranking organization. Portfolio holdings may also be disclosed to other service providers to the Funds, including pricing services, portfolio management and trading systems. Portfolio managers and other senior officers or spokespersons of MFSI or the Funds may disclose or confirm the ownership of any individual portfolio holding position to reporters, shareholders, consultants or other interested persons only if such information has been previously publicly disclosed.

(iii) As required by the federal securities laws, including the 1940 Act, the Funds shall disclose its portfolio holdings in its applicable regulatory filings, including shareholder reports, reports on Forms N-CSR and N-Q or such other filings, reports or disclosure documents as the applicable regulatory authorities may require. For example, MFSI or their affiliates or service providers may file any report required by applicable law (such as, Schedules 13D, 13G and Form 13F), respond to requests from regulators, and comply with valid subpoenas. Nothing contained in the policies is intended to prevent the disclosure of portfolio holdings information as may be required by applicable law.

2. Confidentiality and Duty Not to Trade. The non-public disclosure of Fund portfolio holdings to other third-parties (such as fund evaluation services other than Morningstar and Lipper) may be permissible so long as the third party has signed a confidentiality agreement that is in the form and substance approved by the Fund's CCO. Third parties shall not trade on such information.

3. Prohibition Against Compensation. Neither the Funds, a Service Provider nor any of their affiliated persons (as that term is defined in the 1940 Act) shall receive compensation in any form, whether in cash or otherwise, in connection with the disclosure of information about the Funds' portfolio securities.

4. Persons Authorized to Disclose Information. With respect to the quarterly disclosure of portfolio holdings on the Funds' website, MFSI is authorized to prepare and post the Funds' portfolio holdings and is also responsible, along with the Funds' administrator, for portfolio holdings disclosure to third party service providers of auditing, custody, proxy voting and other services to the Funds, or disclosure to a rating or ranking organization. With respect to any non-public disclosure of the Funds' portfolio holdings, the Funds' CCO , shall be authorized to disclose such information.

5. Shareholders' Best Interests and Conflicts of Interest. The non-public disclosure of portfolio holdings of the Funds to third parties may only be made following a

determination by the Funds' CCO that the disclosure is for a legitimate business purpose and in the best interest of Fund shareholders. In considering whether the disclosure of such information is for a legitimate business purpose and in the best interests of Fund shareholders, the Funds' CCO must consider the conflicts between the interests of the Funds' shareholders, or other of the Adviser's clients and those of the Adviser and any affiliated person of the Funds. The CCO must document any decisions regarding non-public disclosure of portfolio holdings and the rationale therefore. This requirement shall not apply to the disclosure of the Funds' portfolio securities to the Funds' existing service providers of advisory, distribution, custody, fund accounting, sub-administration, independent public accountants, attorneys, proxy voting and other services to the Funds; or disclosure to a rating or ranking organizations in connection with the provision of their services to the Funds, or as otherwise provided herein.

6. Board Oversight. All Confidentiality Agreements shall be provided to the full Board of Trustees or an authorized committee of the Board, on a quarterly basis. Any documentation regarding decisions involving the non-public disclosure of portfolio holdings of the Funds to third parties is to be provided to the Board or an authorized committee he Board shall receive quarterly reports from the Service Providers stating whether disclosures were made concerning the Funds' portfolio holdings in contravention of these policies and procedures during the previous quarter, and if so, such report shall describe to whom and under what circumstance such disclosures were made