Corporate Disclosure Policy

Wintech Group of Companies :

Wintech Metal Berhad
Wintech Metal Processing Sdn Bhd
Wintech Worldwide Sdn Bhd

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Reviewed By:	Approved By:
HR MANAGER	CEO

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1.0 INTRODUCTION

1.1 The Board of Directors of **WINTECH METAL BERHAD (**hereinafter referred to as **"Wintech" or "the Company")** and all its direct and indirect subsidiaries (hereinafter referred to as "**the Group**") is committed to timely and factual disclosure to the public regarding the business, operations and financial performance of the Company, consistent with legal and regulatory requirements, to enable orderly behaviour in the market. This Corporate Disclosure Policy ("the Policy") provides the Company's approach to disclosure of material information and maintaining the confidentiality of information.

2.0 OBJECTIVE OF CORPORATE DISCLOSURE POLICY

2.1 The objectives of the Policy are to:

a) reinforce Wintech's commitment to the continuous disclosure obligations imposed by the Securities Commission and the rules of ACE Market Listing Requirements of Bursa Malaysia Securities Berhad ("Bursa Malaysia") ("ACE Market LR");

b) raise awareness and guide the Board of Directors, Management, and employees on the Company's disclosure requirements and practices;

c) ensure that all persons to whom the Policy applies understand their obligations to preserve the confidentiality of material information; and

d) promote effective communication with shareholders, stakeholders, potential investors and the general public.

3.0 APPLICATION OF THE POLICY

3.1 The Policy applies to the conduct of all Directors, Authorised Spokespersons, Management, and employees of the Company and its subsidiaries who have access to confidential corporate information concerning handling and disclosing material information. It covers, but is not limited to, the following:

a) Disclosure documents filed with the Malaysian securities regulators and written statements made in the Company's annual and quarterly reports;

b) Financial and non-financial disclosure;

c) Press releases;

d) Circular/letters to shareholders;

e) Presentation by Senior Management;

f) Information contained on the Company's website and other electronic communications;

g) Management discussion and analysis;

h) Oral statements made in meetings and telephone conversations with analysts and investors;

i) Interviews with the media;

j) Speeches, press conferences, conference calls and webcasts;

k) Any other dealings with the general public.

4.0 COMMUNICATION OF THE POLICY

4.1 Copies of the Policy are made available to Directors, management, and employees, either directly or from the Wintech's website (www.wintech.com.my). All Directors, management, and employees will be informed whenever there are significant changes. New Directors, management, and employees will be notified of the Policy.

5.0 ADMINISTRATIVE RESPONSIBILITIES

5.1 General

Subject to applicable laws and circumstances determined by the Board as requiring immediate public disclosure, the Policy shall be administered and interpreted by the Designated Person.

5.2 Designated Person

The Finance Director will primarily ensure that Wintech complies with all legal and regulatory disclosure requirements, including:

i. Overseeing the Company's corporate disclosure practices and monitoring compliance with the Policy;

ii. Determining whether the information is material; and

iii. Timely disclosure of material information in accordance with applicable securities law and ACE Market LR.

5.3 Authorised Spokespersons

The Chief Executive Officer ("CEO") and/or Finance Director ("FD") (the "Authorised Spokespersons") are the individuals responsible for communication with investment analysts, shareholders, potential investors and the media; for initiating and overseeing presentations, conference calls and other communications with analysts and other members of financial community; and for overseeing the electronic communications aspect of the Policy. In carrying out their responsibilities, the Authorised Spokespersons will seek to ensure that no undisclosed material information is made available to any selected group. If, for any person, undisclosed material information is disclosed to analysts, the media or others, the CEO and/or FD should be immediately notified.

6.0 CONFIDENTIALITY OF INFORMATION

a) All Directors, management, and employees of Wintech are prohibited from disclosing material undisclosed information. They shall not communicate confidential information to anyone outside of Wintech unless it is necessary to do so in the course of business, required by law or authorised by the Designated Person.

b) Every effort shall be made to limit access to such confidential information to only those who need to know the information, and such persons shall be advised that the information is to be kept confidential.

c) Outside parties who receive or are privy to undisclosed confidential information concerning the Company will be told that they must not reveal such information to anyone else. Management shall ensure that such outside parties confirm their commitment to non-disclosure under a written confidentiality agreement.

d) For prevention of use or inadvertent disclosure of material information, the following general procedures should be observed at all times:

i. *Security and code names*

Documents and files containing confidential information should be kept in a safe place or within the Company's secured IT system, with accessibility restricted to individuals who "need to know" in the necessary course of their work. Code names should be used where necessary.

ii. *No discussion in public places*

Confidential matters should not be discussed in places where they may be overheard, including, but not limited to, elevators, hallways, restaurants, bars, restrooms, aeroplanes, or taxis.

If confidential matters must be discussed on wireless devices in public places, the participants should exercise caution. In such cases, the identity of any relevant party should be cryptic or in code.

iii. *Exercise caution when reading confidential documents in public places*

One should exercise caution when reading confidential documents in public places using smartphones or other personal digital assistant devices.

iv. *Accompanying visitors*

Visitors should be accompanied by Company personnel to ensure that they are not left alone in offices or sites containing confidential information.

v. *Non-participation in social media on matters relating to the Company*

To mitigate the risk of inadvertently disclosing or publishing material and non-public information, employees are strictly prohibited from participating in Internet blogs, chat rooms, similar social media forums (such as Twitter, LinkedIn or Facebook) or newsgroup discussions on matters pertaining to the Company's business and affairs or its listed securities unless authorised to do so by the Designated Person.

7.0 PROCEDURES AND PRACTICES ON CORPORATE DISCLOSURE

7.1 Material Information Release Guidelines

a) In accordance with the ACE Market LR, material information is generally considered to be any information relating to the business, operations and financial performance of the Company and its subsidiaries that results in, or would reasonably be expected to result in, a significant change in:

i. the market price, value or market activity of the Company's securities or

ii. The decision of a company securities holder or an investor determines his choice of action.

b) The following are some examples of events which may require immediate disclosure to Bursa Malaysia by the Company as set out in the ACE Market LR (non-exhaustive):

i. the entry into a joint venture agreement or merger;

ii. the acquisition or loss of a contract, franchise or distributorship rights;

iii. the introduction of a new product or discovery;

iv. a change in management;

v. the borrowing of funds;

vi. the commencement of or the involvement in litigation and any material development arising from such litigation;

vii. the commencement of arbitration proceedings or proceedings involving alternative dispute resolution methods and any material development arising from such proceedings;

viii. the purchase or sale of an asset;

ix. a change in capital investment plans;

x. the occurrence of a labour dispute or disputes with sub-contractors or suppliers;

xi. the making of a tender offer for another corporation's securities;

xii. the occurrence of an event of default on interest or principal payments or both in respect of loans;

xiii. a change in the general business direction;

xiv. a change of intellectual property rights;

xv. the entry into a memorandum of understanding;

xvi. the entry into any call or put option or financial futures contract or

xvii. a change in the business plan of the listed corporation that has been previously disclosed.

7.2 General Guidelines

a) In complying with the continuous disclosure obligations under the applicable laws and the ACE Market LR in a timely manner, the Company shall be governed by the following principles in disseminating material information:

i. *Immediate announcement to Bursa Malaysia*

Subject to the terms of the Policy, material information must be immediately announced to Bursa Malaysia as set out in Paragraph 9.19 of the ACE Market LR as per Appendix I and as amended from time to time.

ii. *Consistent approach to materiality*

The Company would make every endeavour to take a consistent approach to determining the materiality of information, including whether the circumstances or events are measurable and trigger the materiality threshold in the percentage ratio calculation method set out in the ACE Market LR.

iii. *Withholding Confidential Information*

The Company will only withhold material information from the public for legitimate business purposes. These include but are not limited to:

a) when immediate disclosure would prejudice the ability of the Company to pursue its corporate objectives or

b) when the facts are in a state of flux; or

c) where the Company or securities laws restrict such disclosures.

In such cases, the information will be kept confidential until the Designated Person determines it is appropriate to disclose publicly or that the Company has a legal obligation.

If confidentiality is lost or cannot be maintained, the Company will immediately announce the information to Bursa Malaysia.

iv. *Factual and non-speculative disclosure*

The disclosure must be factual and non-speculative and must include any information wherein the omission of which would make the rest of the disclosure misleading.

v. *Prompt disclosure of unfavourable material information*

Unfavourable material information must be disclosed promptly and completely, consistent with favourable information.

vi. *Inadvertent disclosures to be disclosed immediately via announcements*

If previously undisclosed material information has been inadvertently disclosed, such information must be broadly disclosed immediately via announcements. In certain circumstances, applicable securities laws allow for selective disclosure where doing so is in the necessary course of business.

vii. *Immediate correction of material error in disclosure*

The disclosure must be corrected immediately if the Company subsequently learns that an earlier disclosure by the Company contained a material error at the time it was initially distributed.

viii. *Equal access to material information*

All investors must have equal access to material information. Selective disclosure is not allowed.

7.3 Responding to Market Rumours/Reports

a) In general, the Company does not respond to inquiries regarding market rumours/reports unless there is a significant reaction in the market for the Company's listed securities or affects investment decisions.

b) However, should rumours/reports be published in any form whatsoever and howsoever, not limited to an article or otherwise, published in a newspaper, newswire, magazine, a broker's market report or any other publication, the Designated Person shall consider the matter and undertake due enquiry before deciding on the form of statement to be made regarding the rumour.

7.4 Public Disclosure Materials

a) Announcements to Bursa Malaysia and, where applicable, press releases, responses to public queries or media interviews ("Public Disclosure Materials") must contain sufficient detail in plain language to enable investors and media personnel to understand the actual substance, importance and relevance of the information so that investors and other important stakeholders may make informed investment decisions. Once the Designated Person determines that a development is material and must be disclosed, the release of an announcement will be authorised.

The Public Disclosure Materials must:

i. be circulated for input to the relevant personnel as may be designated by the Designated Person;

ii. approved by the Designated Person;

iii. be checked for content, keeping in mind confidentiality and/or approval obligations contained in partnership and/or joint venture agreements;

iv. be issued in accordance with the ACE Market LR; and

v. For press release, include the name and contact numbers (phone, e-mail and fax) of at least one Company's representative/investor relations representative whom the Designated Person has designated to communicate with the investment community and/or the news media.

7.5 Restriction on Insider Trading

a) Under Section 188(1) of the Capital Market & Services Act 2007 ("CMSA"), a person is an "insider" if that person:

   i. possesses information that is not generally available, which, on becoming generally available, a reasonable person would expect to have a material effect on the price or the value of the securities, and

   ii. knows or reasonably ought to know that the information is generally unavailable.

b) Under Section 188(2) of the CMSA states that an insider shall not, whether as principal or agent, in respect of any securities to which information in subsection 188(1) relates:

   i. acquire or dispose of, or enter into an agreement for or with a view to acquisition or disposal of such securities; or

   ii. procure, directly or indirectly, an acquisition or disposal of, or the entering into an agreement for or with a view to the acquisition or disposal of such securities.

c) Based on the above definitions, these persons would include but not limited to the following:

   i. Directors and Top Management of the Company and subsidiaries;

   ii. Employees;

   iii. Persons who provide business or professional services to Wintech; and

   iv. (Any other person or company informed about undisclosed material information about Wintech by any of the above parties.

   As such, the persons stated above with insider knowledge of undisclosed material information are prohibited from trading in the Company's securities until after the information has been publicly disclosed.

7.6 Blackout Period

a) Wintech Group subscribes to the "Blackout Period" (also known as "Closed Period") as stated in the ACE Market LR, defined as a period commencing 30 calendar days before the targeted date of announcement up to the date of the announcement of Wintech's quarterly results to Bursa Malaysia.

b) During Blackout Periods, all Authorised Spokespersons are prohibited from commenting on current period earnings estimates and financial assumptions other than citing or referring to existing public guidance. Communications must be limited to commenting on publicly available or non-material information.

c) All Authorised Spokespersons must also avoid initiating meetings (in person or by phone) with investment analysts, security holders, potential investors and the media on items significant to investors, other than responding to unsolicited inquiries concerning factual information.

d) Wintech does not, however, have to stop all communications with analysts or investors during this period and may, for example, participate in investment meetings and conferences organised by other parties as long as material information which has not been publicly disclosed is not selectively disclosed.

7.7 Forward-Looking Information

a) From time to time, the Company may convey its future direction to the public to assist the market in valuing the Company's securities accurately. The Company shall only discuss general trends, events, commitments and uncertainties that are reasonably expected based on historical and currently known data.

b) Documents containing forward-looking information will be accompanied by a "Cautionary Statement", which cautions the reader on the risks and uncertainties that could cause actual results and developments to differ materially from those envisaged in the forward-looking information. It includes a statement to disclaim the Company's intention or obligation to update the forward-looking information, whether as a result of new information, future events or otherwise.

7.8 Communications with Analysts, Investors and Media

a) The Authorised Spokesperson(s) may meet with analysts, institutional investors, media and other market professionals individually or in small groups and will initiate contact or respond to their calls in a timely, consistent and accurate fashion in accordance with the Policy.

b) The Company will provide only factual and non-speculative information. If material non-public information is inadvertently disclosed at such meetings, the Company will immediately disclose such information via Public Disclosure Materials.

7.9 Reviewing Analyst Reports

a) Analysts may request the Company to review draft analysts' reports from time to time, and only the Designated Person will comment on the analysts' reports. Such comments will be limited to identifying publicly disclosed factual information that could affect the analysts' reports and pointing out inaccuracies or omissions with reference to publicly available information. The Company will not attempt to influence an analyst's conclusions.

7.10 The Company's Website

a) The Company's website (www.wintech.com.my) provides an avenue for shareholders and the investing public to access information pertaining to the Company. It contains an "Investor Relations" section.

b) All disclosures and material information documents of interest to investors will be made available and accessible to the public on the website soon after their release to Bursa Malaysia and/or through the newswire service. These include corporate proposals, general meetings, announcements, financial reporting and all other required announcements pursuant to ACE Market LR.

c) The Finance Department are responsible for ensuring that the information in the "Investor Relations" section of the website is kept up-to-date with the Company's latest disclosures.

7.11 Misrepresentation

a) The Designated Person should be promptly notified if any person to whom this Disclosure Policy applies becomes aware that:

i. any information publicly disclosed by the Company contained or may have contained a misrepresentation; or

ii. There has been or may have been a failure to disclose material information in a timely manner.

After conducting a reasonable investigation of the information, the Designated Person shall endeavour to ensure that the material information, or correction thereof, as the case may be, is promptly disclosed in accordance with applicable laws and the ACE Market LR.

8.0 CONSEQUENCES OF NON-COMPLIANCE WITH THE DISCLOSURE POLICY

Failure to comply with the Policy may result in severe consequences, including internal disciplinary action, termination of employment, or consulting arrangements without notice. The violation of the Policy may also violate specific securities laws, wherein the Company may refer the matter to the appropriate regulatory authorities, which could lead to penalties, fines, or possibly imprisonment.

9.0 REVIEW OF THE POLICY

The Board of Directors of Wintech shall, from time to time, as deemed necessary, determine whether the Policy is effective in ensuring accurate, complete, and timely disclosure in accordance with Wintech's disclosure obligations.

Adopted by the Board: 29 September 2025