



Code of Conduct & Ethics

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

1.0 PURPOSE

- 1.1** The purpose of this Code of Conduct and Ethics ("**Code**") is to establish a systematic guideline and guidance on ethical conduct for **Wintech Metal Berhad** ("**Wintech**" or the "**Company**") and its subsidiaries ("**Wintech Group**" or "**Group**").
- 1.2** The Wintech Group is committed to promoting and maintaining the highest levels of governance, integrity, accountability and transparency in the conduct of its business activities, dealings, relationships and operations.

2.0 SCOPE

- 2.1** The scope of this Code applies to Directors, Key Senior Management, all personnel (as defined in Section 3.13 of this Code), business associates and third-party intermediaries who provide or shall provide products and services and/or acting on behalf of the Wintech Group and extends to all internal and external multi-stakeholders and interested parties to embrace the spirit of our commitment to build a culture of high ethical standards.
- 2.2** This Code is not intended to be all-encompassing or exhaustive and there can be other obligations or expectations of Directors and Key Senior Management on personnel when performing their duties. Although this Code is not meant to address every issue, it defines the spirit in which the Wintech Group conducts its business and serves as a guide to all personnel in their daily conduct.
- 2.3** This Code is formulated to achieve the following objectives:
- (a) To uphold the spirit of corporate and social responsibility in line with the legislation, regulations and guidelines for the administration of an organization in Malaysia;
 - (b) To articulate the highest levels of governance, integrity, accountability, transparency and law-abiding behavior within the Wintech Group;
 - (c) To improve self-discipline to provide good quality services;
 - (d) To ensure that all personnel of Wintech Group are aware of their ethical obligations; and
 - (e) To enhance the standard of corporate governance.
- 2.4** This Code applies in all countries, territories or jurisdictions in which the Wintech Group operates. Where local customs, standards, laws or other local policies are stricter than the provisions of this Code, the stricter rules shall be complied with. However, if this Code stipulates stricter rules than local customs, standards, laws or other local policies, the stricter provisions of this Code shall apply.

3.0 TERMS AND DEFINITIONS

- 3.1** "**Applicable statutory laws and regulatory requirements**" means the principal anti-corruption laws that all personnel are expected to understand and comply with in respective jurisdictions, but are not limited to the following laws:
- (i) Companies Act 2016 (Act 777);
 - (ii) Malaysian Anti-Corruption Commission Act 2009 (Act 694);

- (iii) Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (Act 613);
- (iii) Malaysian Penal Code (Act 574);
- (iv) Election Offences Act 1954 (Act 5);
- (v) Criminal Procedure Code 2012 (Act 593);
- (vi) Police Act 1967 (Act 344);
- (vii) Customs Act 1967 (Act 235); and
- (v) other applicable statutory laws and regulatory requirements related to corporate liability in terms of anti-bribery and anti-corruption in the countries or jurisdictions where Wintech Group operates.

- 3.2 “ABAC Policy”** means the Wintech Group’s Anti-Bribery & Anti-Corruption Policy.
- 3.3 “ARMC”** means the Audit and Risk Management Committee constituted by the Board of Directors of the Company.
- 3.4 “Board”** means the Board of Directors of the Company.
- 3.5 “Business Associate”** means any persons who provides products or performing services for or on behalf of the Wintech Group, apart from the Group’s employees, including contractors or subcontractors, distributors, business contacts, agents, advisers, joint venture partners, intermediaries, sales representatives, consultants, sponsors, service providers and business partners.
- 3.6 “Code”** means the Code of Conduct and Ethics.
- 3.7 “Conflict of Interest”** mean occurs when an individual or organisation is involved in multiple interests, one of which could possibly corrupt, or be perceived to corrupt, the motivation for an act in another. Conflict of Interest arises in a situation where you are or may be in a position to take advantage of your role by using assets, confidential information, proprietary information or intellectual property for the benefit of yourself or a family member or closely related person.
- 3.8 “Disciplinary Actions”** means any action that can be taken on the completion of or during the investigation proceedings including but not limited to a warning, suspension from official duty, termination, or dismissal or any such action as deemed fit considering the gravity of the matter.
- 3.9 “Director” or “Directors”** means the director(s) of the Company and its subsidiaries and shall have the meaning given in Section 2(1) of the Companies Act 2016 and Section 2(1) of the Capital Markets and Services Act 2007.
- 3.10 “HR Manager”** means the Human Resource Manager
- 3.11 “Improper Conduct”** means a breach of discipline or violation of applicable laws and regulations, Code of Conduct and Ethics or the rules and regulations set out in any handbooks, policies and procedures statements or in any other documentations of Wintech Group.
- 3.12 “Listing Requirements”** means ACE Market Listing Requirements of Bursa Malaysia Securities Berhad.

- 3.13 "Personnel"** means any person at all levels and grades including Directors, senior managers, key senior management, managers, executives, officers, non-executives, employees (whether permanent, full-time, part-time, contract, or temporary) employed by Wintech Group including trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, trainees, interns, protégé pupil, sponsors or any other persons associated with the Group.
- 3.13 "Price-Sensitive Information"** means information that "on becoming generally available would or would tend to have a material effect on the price or value of securities" as referred to in Section 185 of the Capital Market Services Act 2007.
- 3.14 "Related Party Transaction"** means transaction as defined under Paragraph 1.01 of the Listing Requirements.
- 3.15 "Third-Party Intermediaries"** means any external individual or organisation that Wintech has or plans to establish some form of business relationship. This can include actual and potential clients, customers, contractors, suppliers, distributors, business contacts, agents, advisers, joint ventures, joint venture partners, intermediaries, sales representatives or consultants and government and agencies and public bodies – this includes (but is not limited to) their advisors, representatives, public officials, politically exposed persons (PEPs) and political parties.
- 3.16 "Wrongdoing"** means action(s) or omission(s) that shall cause harm. Wrongdoing can include but is not limited to the following:
- (a) Bribery and corruption including money laundering, insider trading;
 - (b) Fraud (misappropriation, embezzlement or theft) of the funds or assets of Wintech Group, improprieties and irregularities in accounting and financial reporting, or blackmail;
 - (c) Conflict of interest, abuse of authority and discrimination, gross negligence and mismanagement;
 - (d) Disregard or serious non-compliances with the policies and procedures, financial, legal or regulatory obligations of the Wintech Group;
 - (e) Breach of law (national or international), breach of Wintech Group relevant code of conduct and policies such as fraud or deliberate error in documentation, bribery and corruption, criminal breach of trust, illegal or criminal offense;
 - (f) Unauthorised disclosure or use of Wintech Group's confidential information including commercial or manufacturing secrets, calculations or designs;
 - (g) Any unlawful act whether criminal or civil in nature;
 - (h) Conduct, act or omission which is likely to create a substantial or specific danger to the health and safety of personnel or other individuals or give rise to risk of damage to assets and properties;
 - (i) All forms of harassment including but not confined to unwelcomed verbal or physical advances and sexually or otherwise derogatory or discriminatory statement or remark;
 - (j) Acts, omissions or concealments of wrongdoing knowingly, willfully and intentionally which are detrimental to the interests or reputation of the Wintech Group;

- (k) Collaborating with a person(s) to commit any of the above wrongdoings.

4.0 APPLICABLE FORMS

Appendix I: Declaration that staff have read, understood and shall abide and comply with the information, guidelines and requirements of this Code, ABAC Policy and Whistleblowing Policy.

5.0 RESPONSIBILITIES AND AUTHORITY

- 5.1** The Board and Key Senior Management are responsible for establishing, implementing and maintaining this Code that sets forth our values, expectations and standards of business conduct and ethics that serve as a guide for all personnel of the Wintech Group.
- 5.2** This Code is in accordance with all applicable statutory laws, rules and regulatory requirements and it is the responsibility of the Head of Department to ensure that all personnel, business associates and third party intermediaries of Wintech Group are aware of this Code so as to maintain the highest levels of governance, integrity, accountability and transparency in the conduct of our business activities, dealings, relationships and operations of an ethical corporate environment.
- 5.3** The HR Manager shall be responsible for incorporating any amendments and updates into this Code, to obtain approval from the Board for the amendments and updates, as well as distributing the same to the relevant parties.

6.0 IMPLEMENTATION GUIDELINES

- 6.1** The objective of this Code which sets forth the values, expectations and standards of business conduct and ethics to guide the Board, Key Senior Management and personnel of Wintech Group (collectively referred as “**Parties**”).
- 6.2** The Parties shall maintain the highest standard of business conduct and ethical behaviour in the performance and exercise of responsibilities as personnel of the Group or when otherwise representing the Group. They shall further conduct themselves in a manner that reflects the corporate values and overall spirit of this Code.
- 6.3** As the Parties are placed in a position of trust, which includes overseeing and managing the Group’s resources, having access to information, and making decisions (where applicable) that affect the interests of the Group, they are expected to be honest and impartial when carrying out their respective duties and responsibilities to maintain confidence in the Group and to advance the good name of the Group.
- 6.4** The Parties have to avoid dealing with prospective business associates and third-party intermediaries known to be paying bribes or involved in any other forms of corruption. It is expected that our business associates and third-party intermediaries who provide or shall provide products and services and acting on behalf of the Group comply with this Code and the Group’s ABAC Policy when performing such work or services.

6.5 The Parties shall always observe and ensure compliance with all applicable statutory laws, and regulatory requirements to which they are bound to observe in the performance of their duties. The Parties are also required to comply with the ethical and technical requirements of any relevant regulatory or professional body.

6.6 As a guide, any types of illegal, unethical, questionable practices, or improper conduct committed or about to be committed within Wintech Group, include, but are not necessarily limited to, are identified as wrongdoings as follows:

- (a) Bribery and corruption including money laundering, insider trading;
- (b) Fraud (misappropriation, embezzlement or theft) of Wintech Group funds or assets, improprieties and irregularities in accounting and financial reporting, or blackmail;
- (c) Conflict of interest, abuse of authority and discrimination, gross negligence and mismanagement;
- (d) Disregard or serious non-compliances with Wintech Group policies and procedures, financial, legal or regulatory obligations;
- (e) Breach of law (national or international), breach of Wintech Group relevant code of conduct and policies such as fraud or deliberate error in documentation, bribery and corruption, criminal breach of trust, illegal or criminal offense;
- (f) Unauthorized disclosure or use of Wintech Group confidential information including commercial or manufacturing secrets, calculations or designs;
- (g) Any unlawful act, whether criminal or civil in nature;
- (h) Conduct, act or omission which is likely to create a substantial or specific danger to the health and safety of personnel or other individuals or give rise to risk of damage to assets and properties;
- (i) All forms of harassment including but not confined to unwelcome verbal or physical advances and sexually or otherwise derogatory or discriminatory statement or remark;
- (j) Acts, omissions or concealments of wrongdoing knowingly, willfully and intentionally which are detrimental to Wintech Group interests or reputation;
- (k) Collaborating with a person(s) to commit any of the above wrongdoings.

6.7 The Wintech Group recognizes that some situations are not easy. Ethics is often about arbitrating a conflict of principles. Our Code sets standards for the Group in several “grey areas”, where, beyond the law, a discretionary decision is required. No document can anticipate and address every situation that can arise.

6.8 We can reach an ethical dilemma or a situation where values are at stake and where a choice has to be made from several alternatives based on virtue: duty and calculated risk. So whenever you are faced with this type of decision, ask yourself the following questions:

- (a) Is it in line with the Code? Reflection on values.
- (b) Is it legal? Reflection on compliance, laws, and regulations.
- (c) Is it in line with our Core Values: Governance, Integrity, Accountability and Transparency?
- (d) How would my actions affect our stakeholders, and could I justify my decision?
- (e) Would I be comfortable if my decision was made public internally or

externally? Reflection on the consequences on a specific action on self and others.

If the answer to one of these questions is “NO”, or if you have any doubts, the golden rule is to consult the appropriate people (your superior, line manager, Head of Department or HR Manager) and discuss the matter openly before acting.

- 6.9** The Code does not replace any existing policies, and you should continue to refer to whatever rules and standards have been set in your workplace. This Code aims to provide a framework for these policies and standards, so that it is easier for you to understand the rationale behind them.

7.0 CODE OF CONDUCT AND ETHICS (“CODE”)

- (a) This Code sets out the values, expectations and standards of business conduct and ethics which are founded on the principles of good corporate governance, integrity, accountability and transparency in all our actions and the conduct of our business and relationships.
- (b) All personnel are expected to build upon, live out and be examples of the core values that drives our Group. We are therefore accountable to each other not to violate our Code, policies, laws and regulations. It is the responsibility of every personnel to abide by our Code and policies. If any personnel is found to have breached this Code and/or any compliance requirement of the Group, they shall be considered to have committed a serious disciplinary offence and shall face disciplinary action
- (c) Our Code of conduct and Ethics covered following:
 - a. People and Social Responsibility
 - b. Environmental Stewardship
 - c. Fair Business Practices

7.1 PEOPLE AND SOCIAL RESPONSIBILITIES

The Wintech Group is committed to fostering a safe, inclusive and supportive working environment while contributing positively to society.

Key focus areas include:

- Providing a safe and healthy workplace in compliance with applicable occupational safety and health regulations
- Supporting employee development through training and awareness programmes
- Promoting fair labour practices, equal opportunity and respect in the workplace
- Conducting community engagement initiatives that contribute to social and environmental wellbeing.

7.2 ENVIRONMENTAL STEWARDSHIP

The Wintech Group committed to minimising environmental impact and improving resource efficiency across its operations.

Key focus areas include:

- Monitoring and managing energy, water and waste performance
- Promoting efficient use of resources and reducing operational inefficiencies
- Ensuring proper handling and disposal of scheduled waste in compliance with regulatory requirements
- Strengthening environmental monitoring and data management practices
- Progressively enhancing greenhouse gas (GHG) emissions tracking, covering Scope 1, Scope 2 and selected Scope 3 categories
- Monitoring environmental aspects and impacts associated with manufacturing activities and continuously improving control measures

7.3 FAIR BUSINESS PRACTICES

(a) Fair Competition

The Wintech Group is committed to working in an industry where business practices are healthy, fair and reputable. The Group respects all stakeholders in our professional sphere including our competitors. We treat them the way we would like them to treat us.

(b) Insider Trading

The Wintech Group does not restrict the freedom of personnel to make appropriate personal investments. However, each of us must always bear in mind the rules on “insider trading”. We must never use or disclose material, non-public information about the Group for the purpose of buying or selling securities.

All personnel must ensure that all transactions/dealings in the Company’s shares comply with the procedures set out in the Listing Requirements and the law on insider trading.

(c) Financial Integrity and Business Records

The Wintech Group is committed to ensuring that all our records, financial or otherwise, are accurately, completely and precisely recorded in a timely manner in accordance with our internal Financial Manual. All transactions must be accurately and properly recorded in the books of accounts. Off the record funds and accounts are strictly prohibited. The Group has an Authority Limit matrix (“ALM”) in place to govern the authorizations required in doing business. All the personnel must be aware of the ALM and follow them without any attempt to bypass requirements.

(d) Honesty Advertising

The Wintech Group is valued and is committed to accuracy and transparency in its advertisements and promotions.

(e) **Tax and Trade Controls**

As a good corporate citizen, the Wintech Group seeks to comply with applicable tax and trade control laws and regulations wherever it operates. The Group shall respect tax laws, trade control laws and regulations which prohibit or restrict sales or other transactions involving certain products, services, software and technologies to certain countries, individuals or entities to secure international peace and security.

(f) **Bribery and Facilitation Payments**

The Wintech Group's ABAC Policy spells out our commitment to promote and maintain the highest levels of governance, integrity, accountability and transparency in all our business activities, dealings, relationships and operations. The Group shall not offer or accept any form of payment or incentive intended to improperly influence a business decision.

(g) **Gifts and Hospitality**

The Wintech Group adopts the practise of giving and receiving business gifts and hospitality that contribute towards building understanding and improving work relationships. Cognizant that the culture of gifts and hospitality vary across companies, countries, regions, cultures and religions, the Group expects all personnel to familiarise and comply with its ABAC Policy when receiving or giving gifts and hospitality.

(h) **Charitable Donations**

The Wintech Group in its role as a good corporate citizen, regularly undertakes social and philanthropic programs that are in line with our business objectives and strategies or those programs that will benefit the broader interests of the community as a whole, while complementing the efforts of the industry and Government. The Group also encourages its employees to actively participate in community and charitable activities through volunteerism, the sharing of skills and expertise, and the contribution of goods, resources, or other in-kind support to charitable organizations.

(i) **Political Contributions, Political Activities and Lobbying**

The Group has a policy of strict political neutrality and as stated in our ABAC Policy, Wintech does not make political donations or contributions to any political parties, organisations or individuals engaged in politics nor does it incur any political expenditure.

Nonetheless, the Group respects the right of its personnel to participate as individuals in the political process provided they make it clear that they do not represent the Group in such political activities.

However, the Wintech Group believes it is our duty and responsibility to be proactive and to contribute and partake in the public decision-making process

in the countries in which it operates for its betterment and improvement of the industry.

(j) Conflict of Interest

The Wintech Group is committed to always act in the best interests of the Company rather than for personal gain. The Group aims to avoid situations where our personal interests might come into conflict with the interests of the Wintech Group as guided by our ABAC Policy.

In a conflict-of-interest situation, a full disclosure of all the facts is essential and the Directors shall be governed by the Companies Act 2016 and Listing Requirements on matters relating to the disclosure of such conflict of interest.

(k) Fraud, Breach of Trust and Abuse of Power

The Wintech Group is committed to promoting and adhere to our core values of governance, integrity, accountability and transparency in all our business activities, dealings, relationships and operations.

The Group shall ensure that all personnel are aware through this Code and our other related policies on the following:

- (i) personnel are not to engage in any transaction involving dishonesty and fraud;
- (ii) personnel are not to engage in a behaviour that constitutes a breach of our trust and confidence in them; and
- (iii) personnel are not to abuse their authority or power for personal gain or interest, or for any special or preferential treatment.

(l) Cybersecurity Protection of Company Devices

The Wintech Group is committed to protecting and keep the data and records of the Group safe and reliable. The Group shall employ various IT tools, methodologies and processes to reduce the likelihood of security breaches or data contamination and to proactively manage, protect and safeguard the integrity of our systems and databases.

8.0 MONITORING AND FAILURE TO COMPLY

8.1 It is the responsibility of the personnel of Wintech Group to ensure full compliance with all the provisions of this Code and where necessary, to seek guidance from their respective superiors, line manager, Head of Department or the HR Manager.

8.2 Any personnel shall notify his or her superior, line manager, Head of Department as soon as possible if he or she has reasonable grounds to believe or suspects that a breach of this Code has occurred or is suspected to have occurred. The personnel can raise his or her concerns in accordance with the Group's Whistleblowing Policy and Guidelines.

- 8.3** The whistleblower can speak-up or report in good faith any illegal, unethical, questionable practices, wrongdoings or improper conduct committed or is about to be committed within the Wintech Group, without fear of being subjected to detrimental conduct including reprisal and/or retaliation.
- 8.4** Directors and/or Key Senior Management shall immediately report any concern about breaches or possible breaches of this Code by any personnel to the Chairperson of the ARMC of the Company, where applicable, in accordance with the Whistleblowing Policy and Guidelines.
- 8.5** In the event of any breaches of this Code by any Director, the other Board members shall determine the appropriate action to be taken after considering all relevant information and circumstances.
- 8.6** When in doubt, personnel of the Group shall be guided by the principles stated herein and the Whistleblowing Policy and Guidelines. Failure to comply with this Code can result in disciplinary action, including the possibility of dismissal and, if warranted, legal proceedings or criminal sanctions.

9.0 COMPLIANCE TO THE LAW

- 9.1** The Wintech Group shall comply with all applicable statutory laws, rules and regulatory requirements of the governments, commissions, and exchanges in jurisdictions within which the Group operates.
- 9.2** The implementation of this Code is in line with and subject to the following laws:
- (a) Whistleblowers Protection Act 2010;
 - (b) Companies Act 2016;
 - (c) Malaysian Anti-Corruption Commission Act 2009;
 - (d) Capital Markets and Services Act 2007;
 - (e) Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001;
 - (f) Personal Data Protection Act 2010;

and all applicable statutory laws and regulatory requirements in Malaysia wherein provisions have been made to protect whistleblower make disclosures on breach or non-observance of any requirement or provision of the applicable laws and regulations, or on any serious offence involving wrongdoings, improper conduct, unethical practices or fraud and dishonesty.

- 9.3** The Wintech Group reserves its right to report any actions or activities suspected of being criminal in nature to the government agencies, anti-corruption agency, police or other relevant authorities.

10.0 SUPPLEMENTARY TO CODE OF CONDUCT AND ETHICS

- 10.1** This Code shall be read in conjunction with the various policies and procedures of Wintech Group such as:
- (a) Anti-Bribery & Anti-Corruption Policy ;
 - (b) Whistleblowing Policy & Guidelines ;

11.0 IMMUNITY AND DISCLAIMER

- 11.1** Any personnel of Wintech Group who participated in any act that constitutes the act of violation of laws, policies and procedures mentioned above which he or she reported, he or she shall not be given immunity against any investigation or disciplinary and/or criminal proceedings arising out of the report made.

Nevertheless, in such circumstances, the fact that he or she had caused the report to be made can be taken into consideration as a mitigating factor.

12.0 REVIEW OF THIS CODE

- 12.1** The Board and Key Senior Management of Wintech Group shall monitor the implementation of this Code and review it at planned intervals to ensure that it continues to remain relevant and appropriate for its suitability, effectiveness and efficiency in keeping with the changing business environment, administrative or operational needs of the Wintech Group as well as changes to statutory laws and regulatory requirements.
- 12.2** This Code was adopted by the Board on 29th September 2025 and is made available on the Company's website at <https://www.wintech.com.my/>
- 12.3** The HR Manager shall review and update this Code on a regular basis before forwarding it to the Board for approval.
- 12.4** This Code is subject to updating and modifications from time to time to be in line with applicable statutory laws and regulatory requirements and organizational changes within Wintech Group.

APPENDIX I

DECLARATION BY STAFF THAT THEY HAVE READ, UNDERSTOOD AND SHALL ABIDE AND COMPLY WITH THE INFORMATION, GUIDELINES AND REQUIREMENTS OF THE CODE OF CONDUCT & ETHICS, ANTI-BRIBERY & ANTI-CORRUPTION (ABAC) POLICY AND WHISTLEBLOWING POLICY & GUIDELINES

I, _____, hereby certify and declare that I have read and understood the (i) Code of Conduct & Ethics, (ii) Anti-Bribery & Anti-Corruption (ABAC) Policy and (iii) Whistleblowing Policy & Guidelines ("**Policies**") of the **Wintech Group** with respect to compliance with Malaysian Anti-Corruption Commission Act 2009, Whistleblower Protection Act 2010 and Companies Act 2016.

THAT I understand that the **Policies** apply to all **Wintech Group's** directors, key senior management, employees, business associates and third-party intermediaries.

I agree that any business decisions and actions that I am dealing with, shall be based on the best interest of the organization I am representing, and shall not be motivated by personal interests, considerations or relationships.

My relationships with prospective or existing customers, business associates and third-party intermediaries shall not affect my independent and sound judgment acting on behalf of the organization.

I am aware of the Anti-Bribery and Anti-Corruption (ABAC) Policy of **Wintech Group** regarding gifts and hospitality, receiving from and giving to any customers, business associates and third-party intermediaries with whom I am dealing with, and I certify that I have not violated these prohibitions.

I am also aware of the Code of Conduct and Ethics of **Wintech Group** covering (a) People and Social Responsibility; (b) Environmental Stewardship and (c) Fair Business Practices , and I certify that I have not violated these practices.

To the best of my knowledge and belief, I shall comply with the aforementioned provisions of **Policies** and I understand my responsibility to immediately speak-up or report any known or possible wrongdoing, conflict of interest situation or suspected violation in good faith to my immediate superior, manager, Head of Department or directly using the secured and confidential Whistleblowing channels.

I also certify my understanding that any failure by me to comply with the **Policies** may result in disciplinary action taken against me, including but not limited to withholding of bonuses, increments and merits awards, denial of promotion and termination of my employment or dismissal for gross misconduct, or termination of contractual agreement.

Signature : _____

Name : _____

Employee ID/Contract Number : _____

Name of Associate Company : _____

Designation : _____