

No.: 0609/2026/CV-POM

Ho Chi Minh City, June 09, 2026

Re: Report on status of compliance with  
public company conditions

**To:** The State Securities Commission

- Pursuant to the Law on Securities dated November 26, 2019 ("**Law on Securities No. 54/2019/QH14**");

- Pursuant to the Law Amending and Supplementing a Number of Articles of the Law on Securities, the Law on Accounting, the Law on Independent Audit, the Law on State Budget, the Law on Management and Use of Public Assets, the Law on Tax Administration, the Law on Personal Income Tax, the Law on National Reserves, and the Law on Penalties for Administrative Violations dated November 29, 2024 ("**Law No. 56/2024/QH15**");

- Pursuant to Circular No. 19/2025/TT-BTC dated May 05, 2025 of the Ministry of Finance stipulating the registration of public companies, cancellation of public company status, and reporting on audited contributed charter capital ("**Circular No. 19/2025/TT-BTC**");

- Pursuant to the 2025 audited separate and consolidated financial statements of Pomina Steel Corporation.

Pomina Steel Corporation (the Company) – Stock code: POM, Exchange: Upcom, hereby reports to The State Securities Commission on the Company's status regarding compliance with public company conditions as of May 29, 2026, as follows:

Based on the 2025 audited separate financial statements, the Company's equity as of December 31, 2025, was negative 590,243,445,055 VND (*attached is the 2025 audited separate financial statements*).

Based on the 2025 audited consolidated financial statements, the Company's equity as of December 31, 2025, was negative 630,742,417,321 VND (*attached is the 2025 audited consolidated financial statements*).

According to the provisions of **Point a, Clause 1, Article 32 of the Law on Securities No. 54/2019/QH14**, as amended and supplemented by **Point a, Clause 11, Article 1 of Law No. 56/2024/QH15**, a public company must simultaneously meet the following conditions: *"The company has a contributed charter capital of 30 billion VND or more, has equity of 30 billion VND or more, and has at least 10% of voting shares held by at least 100 investors who*



are not major shareholders." Therefore, the Company no longer meets the equity condition prescribed for public companies and is subject to consideration for the cancellation of its public company status in accordance with **Article 8 of Circular No. 19/2025/TT-BTC**.

By this document, the Company respectfully reports to The State Securities Commission on the Company's status regarding compliance with public company conditions in accordance with current legal regulations.

Simultaneously, the Company is actively implementing solutions to restructure its production and business activities, addressing financial issues, and improving its equity position to fully meet the conditions of a public company as required by law. According to the plan, the Company expects to hold the Annual General Meeting of Shareholders on June 30, 2026, to consider and approve matters under the authority of the General Meeting of Shareholders, including plans to resolve the negative equity situation and gradually bring the Company back to meeting the conditions of a public company as prescribed.

The Company respectfully requests The State Securities Commission to acknowledge the aforementioned efforts and the roadmap for rectification of the Company during the process of reviewing the Company's status regarding compliance with public company conditions.

Sincerely./.

**Recipients:**

- As above
- Archived

*Attached: Audited separate and consolidated financial statements of Pomina Steel Corporation*

**GENERAL DIRECTOR**



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