

Procurement Policy

1. Objective

The Company is committed to conducting its business with transparency, fairness and accountability. This Policy has been established so that the Company's procurement process follows a single standard, treats business partners equitably, prevents fraud and corruption, and supports Sustainable Procurement, in line with the principles of good Corporate Governance.

2. Scope of Application

This Policy applies to all executives, employees and other persons involved in the procurement process of the Company and its subsidiaries. It also sets out the standards of practice expected of the Company's business partners (Suppliers/Vendors).

3. Key Principles

3.1. Transparency & Fair Competition

- **Equitable treatment of business partners:** Provide every suitably qualified business partner with the opportunity to submit a bid, giving them the same information and conditions, completely and accurately.
- **Clear selection criteria:** The selection of business partners must be made through a committee or the authorised approver, as the case may be, using transparent and measurable criteria such as quality, price, delivery track record, warranty, and ESG standards.
- **Auditability:** Evidence and supporting documentation for the decision must be recorded at every stage so that the process can be audited retrospectively.

3.2. Conflict of Interest

- Employees involved in procurement must not have any interest, whether direct or indirect, in a business partner participating in the bidding process.

- Any employee who finds that they have a connection with a business partner (for example, being a close relative or holding a partnership interest) must immediately notify their supervisor in writing and must withdraw from the selection process for that business partner.

3.3. Anti-Corruption & No Gift Policy

- Employees are prohibited from soliciting or accepting assets, goods, entertainment, or any other benefit from a business partner in exchange for granting favourable treatment in procurement.
- The Company strictly enforces its No Gift Policy on all festive occasions, in order to prevent bias and maintain professional standards.

3.4. Sustainable Procurement / ESG

- **Environmental:** Support business partners with environmentally friendly production processes and sound waste management, and promote the use of green-labelled products (Green Procurement).
- **Social:** Select business partners that respect human rights, do not use child labour or forced labour, and safeguard the safety and occupational health of their employees.
- **Governance:** Support business partners that conduct their business lawfully, uphold a code of ethics, and have no record of corruption.

4. Vendor Registration & Evaluation

Vendor Registration

- Business partners must pass a preliminary qualification assessment and be registered on the Company's Approved Vendor List.
- Business partners must acknowledge and sign an undertaking to comply with the Company's "Supplier Code of Conduct". The Company may, at its discretion, waive

the requirement for a business partner to sign the Company's Supplier Code of Conduct where that business partner has clearly adopted its own Code of Conduct in writing — for example, disclosed on the business partner's website, stated in a contract or agreement, or in other business documentation. In such a case, the business partner's policy must have an intent and standards of practice covering environmental, social and governance (ESG) matters at a level equivalent to, or not lower than, the criteria set by the Company.

Vendor Evaluation

- The Company will evaluate the performance of its business partners at least once a year, taking into account the quality of goods/services, punctuality of delivery, and compliance with ESG criteria.
- If a business partner does not meet the evaluation criteria, the Company will notify the business partner so that corrective action can be taken, and may consider suspending orders if no improvement is made.

5. Whistleblowing

Should any unfair practice, act of fraud or corruption, or breach of the code of conduct in procurement be observed, business partners may report it through the Company's complaint channels. The Company has strict measures in place to protect whistleblowers and to keep their identity confidential.

- Via the Company's website at <https://www.turbo.co.th/whistleblower>, by completing the “Whistleblowing Form”
- Via electronic mail at the e-mail address: whistleblower@turbo.co.th

6. Penalties

Employees who violate this Policy will be subject to disciplinary action under the Company's work rules and regulations. Where the violation also constitutes an offence under the law, the Company will pursue legal proceedings to the fullest extent. Business

partners who violate this Policy may have their status as a business partner revoked and their name removed from the vendor register (blacklisted).

7. Policy Review and Revision

The Company requires this Procurement Policy to be assessed and reviewed at least once a year, or whenever there is a material change in laws, regulations, the business environment, or corporate governance assessment criteria (CG Scoring).

This Policy shall come into effect on 13 August 2026, having been approved by the Board of Directors at its Meeting No. 3/2026 held on 13 August 2026.