Purchasing Procedure

1) Purpose

This Purchasing Procedure (the “Procedure”) aims to establish criteria and guidelines for the purchase of the Company's assets, materials, and equipment (hereinafter referred to as “Purchasing”) and ensure that such activities are conducted in a transparent, fair, efficient, and auditable manner, free from fraud, corruption, and conflicts of interest in accordance with the Company's Anti-Corruption Policy, all applicable laws and regulations and good corporate governance.

2) Key Principles

The Company is committed to conducting its purchasing process in accordance with the principles of good corporate governance, adhering to the following key principles:

- **Fairness**

  The Company shall provide all qualified suppliers and service providers with equal opportunities to submit quotations and compete under the same terms, conditions, and evaluation criteria, without discrimination or preferential treatment toward any party.

- **Transparency**

  The purchasing process shall be governed by clearly defined procedures, evaluation criteria, and approval authorities, all of which shall be documented in writing. The process must be transparent and fully auditable.

- **Value for Money**

  Suppliers and service providers shall be selected based on overall value and the Company's best interests. Evaluations shall consider relevant factors such as price, quality of goods and services, service standards, delivery lead time, reliability, and overall performance, rather than price alone.

- **Compliance**

  All purchasing activities shall be conducted in strict compliance with applicable laws, rules, regulations, and the Company’s policies, including the Company's Anti-Corruption Policy and Code of Conduct.

3) Supplier Selection Guidelines, Including Suppliers Providing Installation, Warranty, or After-Sales Services as Part of the Purchase (if applicable)

3.1 Fair and Competitive Purchasing

- The Company shall promote fair competition by requiring price comparisons and/or proposals from at least three (3) qualified suppliers, including suppliers providing installation, warranty, or after-sales services as part of the purchase (if applicable), where the total value of the goods purchased, including installation, warranty, or after-sales services (if applicable), is THB 50,000 or more.
- The selection of suppliers, including suppliers providing installation, warranty, or after-sales services as part of the purchase (if applicable), shall be based on clear and verifiable evaluation

criteria. Such evaluation shall consider relevant factors, including price, quality of the goods purchased, installation, warranty, or after-sales services (if applicable), experience, operational capability, delivery, and/or, where applicable, installation or after-sales service capability.

- The Company shall not establish any Terms of Reference (TOR) (if applicable), technical specifications (Specifications), or any conditions that unfairly restrict competition or provide undue advantage to any particular supplier, including suppliers providing installation, warranty, or after-sales services as part of the purchase (if applicable), unless such requirements are supported by legitimate business reasons that can be properly justified and independently verified.

3.2 Ethical Supplier Selection

- Supplier selection shall not be influenced by personal relationships, familiarity, favoritism, or any consideration unrelated to business efficiency and appropriateness.
- The Company shall not engage any supplier, including suppliers providing installation, warranty, or after-sales services as part of the purchase (if applicable), that violates applicable labor laws or human rights standards.
- Directors, executives, and employees shall not grant preferential treatment, provide undue advantages, or take any action that may create an unfair competitive advantage for their relatives, close associates, acquaintances, or business partners, whether directly or indirectly.
- Where any director, executive, or employee has an actual or potential Conflict of Interest relating to any purchasing transaction, such individual shall immediately disclose the relevant information to his or her supervisor and/or the relevant department. The individual concerned shall not participate in the selection and decision-making process relating to such purchase.

4) Prohibition of Improper Benefits

Directors, executives, employees, authorized approvers, and all personnel involved in the Purchasing Process at all levels shall perform their duties with honesty, integrity, transparency, and impartiality, free from the influence of personal interests. They shall neither solicit, accept, offer, nor provide any improper benefit to or from any supplier, including suppliers providing installation, warranty, or after-sales services as part of the purchase (if applicable), where such benefit may influence, or appear to influence, purchase decisions or compromise the fairness of the Purchasing Process, particularly during quotation submission, competitive bidding, tendering, auctions, or contract negotiations.

Furthermore, directors, executives, employees, and other relevant personnel shall not accept gifts, hospitality, entertainment, or any other benefit of value that could reasonably be perceived as an attempt to influence a business decision or obtain an improper business advantage, whether directly or indirectly. Such prohibited benefits include, but are not limited to:

- Cash or cash equivalents;
- Gifts, vouchers, or gift cards;
- Travel expenses, accommodation, or other personal expenses;
- Hospitality or entertainment exceeding reasonable business practices or inconsistent with the Company's Anti-Corruption Policy
- Any other form of personal benefit or preferential treatment.

5) Approval Authority and Segregation of Duties

To strengthen the Company's internal control system and minimize the risks of fraud, abuse of authority, and conflicts of interest, the Company shall establish a clear segregation of duties, responsibilities, and approval authorities throughout the Purchasing Process. No individual shall perform multiple functions that could compromise the effectiveness of internal controls.

The key roles and responsibilities are as follows:

- **Requester**
  The Requester shall prepare the Purchase Requisition (PR) and provide complete and accurate information regarding the purchasing requirements, business justification, and purchasing objectives.
- **Evaluator**
  The Evaluator shall review, compare, and evaluate quotations or proposals submitted by suppliers, including suppliers providing installation, warranty, or after-sales services as part of the purchase (if applicable), in accordance with the Company's established evaluation criteria. The evaluation shall be conducted fairly, objectively, transparently, and in a fully auditable manner.
- **Approver**
  The Approver shall review and approve purchasing transactions within the delegated authority and approval limits established by the Company. Before approval, the Approver shall verify the appropriateness, business necessity, and completeness of all supporting documentation.
- **Receiver**
  The Receiver shall inspect and verify the accuracy, completeness, and quality of the goods procured, including installation, warranty, or after-sales services provided as part of the purchase (if applicable), to ensure compliance with the agreed purchasing terms, scope of work (where installation or related services are involved), and contractual specifications before accepting the goods or services or approving payment.

6) Documentation and Audit Trail

The Company shall ensure that all purchasing process-related documents are properly prepared, maintained, and retained completely and accurately to facilitate review, monitoring, traceability, and retrospective verification at every stage of the Purchasing Process. Such documentation shall also support the Company's internal control system, internal audit activities, and audits conducted by relevant regulatory or supervisory authorities. Purchasing documentation shall include, at a minimum:

- Purchase Requisition (PR);
- Quotations submitted by suppliers, including suppliers providing installation, warranty, or after-sales services as part of the purchase (if applicable);
- Price and conditions comparison;
- Supplier basic information and conflict of interest screening
- Record supporting the selection of suppliers, including suppliers providing installation, warranty, or after-sales services as part of the purchase (if applicable);
- Contracts, purchase orders (PO), or other relevant contractual agreements;
- Goods receipt records and evidence of completion of installation, warranty, or after-sales services forming part of the purchase (if applicable).
- Terms of Reference (TOR) (if applicable).

All procurement records shall clearly identify the source of the transaction, the approval workflow, and all relevant transaction details to facilitate an effective audit trail and ensure sound corporate governance.

7) Whistleblowing and Reporting Channels

The Company encourages directors, executives, employees, business partners, and all stakeholders to participate in ensuring that the Purchasing Process is conducted in a transparent, fair, and ethical manner. Any person who becomes aware of, or reasonably suspects, any act of fraud, corruption, unethical conduct, or other inappropriate practices that may adversely affect the Company's interests is encouraged to report such concerns through the Company's designated reporting channels.

Reportable misconduct includes, but is not limited to:

- Preparing specifications or purchasing conditions that unfairly favor a particular supplier;
- Bid rigging, collusive bidding, or other anti-competitive practices;
- Soliciting, offering, giving, or accepting improper benefits; and
- Improper selection of suppliers, including suppliers providing installation, warranty, or after-sales services as part of the purchase (if applicable), or any purchasing activity that violates the Company's purchasing regulation.

Reports may be submitted through the Company's designated reporting channels, including the Whistleblowing Channel, the Personnel and Administration Department, or the compliance unit.

8) Disciplinary Actions

Any director, executive, employee, or other relevant stakeholder who violates, fails to comply with, or participates in any act contrary to this Purchasing Procedure, whether directly or indirectly, shall be subject to disciplinary action in accordance with the Company's regulations and internal policies.

Where such conduct constitutes a violation of applicable laws or regulations, the Company reserves the right to initiate legal proceedings against the responsible individual(s) and to seek compensation for any losses or damages incurred by the Company, as appropriate.

This Procedure shall be understood and strictly observed by all directors, executives, and employees at all levels. The Procedure shall become effective on 6 August 2026.

This Procedure is hereby announced for general acknowledgment and strict compliance.

(Mr. Voon Ee Huei)
Director and CEO