

# TURNER POLICY: SUSTAINABLE PROCUREMENT

Issued by: ESG Department

Approved by: ESG Committee

Approved Date: 07/01/2025

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## SUMMARY

### 1. Summary

Turner's Sustainable Procurement Policy sets out the fundamental principles and expected behaviors that guide how we source goods and services. It describes the proactive due diligence process we follow to assess suppliers' environmental, social, and governance performance, helping us to prioritize, prevent, mitigate, and address any adverse impacts throughout our supply chain.

### 2. Purpose

This policy provides a clear framework for integrating sustainability into Turner's procurement activities. It defines the roles and responsibilities of all members of the organization, establishes procedures for supplier evaluation and engagement, and ensures that our purchasing decisions support ethical, environmental, and social objectives in line with Turner's broader ESG commitments.

### 3. Scope and Use

This policy applies to The Turner Corporation, its subsidiaries, and joint ventures of which they are a member (collectively, "Turner" or the "Company").

## POLICY

### PURPOSE

This Policy aims to establish the basic principles of action and patterns of behavior of Turner with projection onto the Group in the procurement of goods and the contracting of services necessary for the development of its activities, in order to promote best sustainability practices throughout the Chain of activities. This Policy is based on the Code of Conduct, the Code of Conduct for Business Partners and the ESG Strategy of Turner, regardless of whether other Standards with projection onto the Group.

### DEFINITIONS

For the purposes of this Policy, the following terms shall be interpreted in accordance with the definitions set forth below:

- **Chain of activities/supplies:** The activities of the Business Partners involved in the upstream and downstream phases of activities relating to the production of goods or the provision of services by Turner and its Group companies.
- **Code of Conduct:** The Turner Code of Conduct.
- **Code of Conduct for Business Partners:** The Code of Conduct for Business Partners of Turner.
- **Interest Groups/Stakeholders:** those collectives that may affect or be affected by the activities of Turner and, in particular, the directors, managers, employees, employee representatives, trade unions and Business Partners of the Group, as well as consumers, groupings, communities or entities whose rights or interests are or could be affected by the products, services and operations of the Company, its subsidiaries and/or its Business Partners, including national environmental and human rights institutions, civil society organizations whose purposes include the protection of the environment and the legitimate representatives of such persons, groupings, communities or entities.
- **IROs:** Incidents, risks and opportunities.
- **Members of the Organization:** members of the governing bodies, managers, employees, workers or temporary employees or employees hired under a collaboration agreement, and interns or volunteers of Turner.

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- **Standards:** Turner corporate texts of a different nature, such as Policies, Regulations or Procedures, among other texts, which, where applicable, project onto the Turner Group.
- **Environmental Policy:** Turner's Environmental Policy.
- **Sustainable Procurement Policy/Policy:** Turner's Sustainable Procurement Policy.
- **Human Rights Policy:** Turner's Human Rights Policy.
- **General Risk Control and Management Policy:** Turner's General Risk Control and Management Policy.
- **Due Diligence Protocol:** The Corporate Due Diligence Protocol on Sustainability.
- **Business Partners:** Any legal or natural person with whom Turner or the Group companies maintain a commercial or business agreement in their Chains of activities. These include, by way of example, but are not limited to, suppliers or providers of goods or services, intermediaries such as agents or commission agents, external advisors or joint ventures.

## SCOPE OF APPLICATION

This Policy is applicable to all Turner activities, and compliance therewith is therefore mandatory managers, employees, workers or temporary employees or employees under collaboration agreements, and Turner interns (hereinafter the "**Members of the Organization**"), encouraging all staff to perform under the same paradigm, while implementing this Policy throughout the entire Turner chain of activities.

Likewise, Turner will monitor that the principles of the Policy are applied, where and to the extent appropriate, to significant suppliers of goods or services throughout the procurement process along the Chain of activities (Business Partners).

Turner will also promote the application of the principles of this Policy with respect to participating entities and, where appropriate, with respect to joint ventures, whether national or foreign.

In turn, in the implementation of the principles of the Policy, Turner will collaborate constructively with their stakeholders, in order to establish channels of communication, consultation and contacts that contribute to the better performance of the Group and its business Partners in matters of sustainability.

## FRAMEWORK REGULATIONS (REFERENCE STANDARDS)

This Policy must be interpreted in the context of the following Turner Standards and the provisions established in current legislation applicable, including the following:

- Code of Conduct.
- Code of Conduct for Business Partners.
- Sustainability (ESG) Policy.
- Human Rights Policy.
- Environmental Policy.
- General Risk Control and Management Policy.

## EXTERNAL SOURCES

Turner monitors developments in sustainability that may be relevant to the Organization and, in particular, those related to the supply chain, to ensure that the internal frameworks for action are up to date and based on an analysis of the latest internationally recognized agreements and standards for their integration when these are relevant to and feasible for Turner, also considering the legitimate expectations of the different stakeholders.

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## SUPPLIER CLASSIFICATION

Turner uses the following classification of suppliers within the scope of its goods procurement process:

- **Suppliers or Direct Business Partners (tier-1):** legal entities with whom Turner enters into a commercial agreement related to its operations, products or services.
- **Indirect Suppliers (tier-2):** legal entities who maintain a commercial or business agreement with a tier-1 Supplier related to Turner's activities the object of which is the supply of materials or the provision of services within the scope of Turner's Chain of activities. Example: A tier-2 supplier sells to a tier-1 supplier a raw material that the latter needs to manufacture a component that will subsequently be transferred to Turner and that the Organization will use within the scope of its business activities.
- **Significant Suppliers:** tier-1 Suppliers or Business Partners and/or tier-2 Suppliers that:
  - have significant business relevance for the Organization (the failure of which would result in detrimental impacts to one or more projects or the Organization)
  - are suppliers of critical (project-related) components; and/or
  - are non-replaceable suppliers.
- **Relevant Suppliers:** tier-1 Suppliers or Business Partners that:
  - are significant suppliers; or
  - have been identified as presenting actual or potential risks of adverse impacts on sustainability.

## BASIC PRINCIPLES OF ACTION

With this policy, Turner establishes its objective of integrating sustainability aspects into the procurement process of the company, regardless of the geographical location, and where the suppliers with whom it maintains a commercial or business relationship (Business Partners) provide their services; this commitment is extended to all the companies in the Turner Group.

Turner operates through local offices and subsidiaries that share culture and values, each of them operating within the defined company policy and data management platform(s) based on the common principles and objectives defined in this Policy, which are to:

- Analyze our relevant suppliers for material impacts, risks, and opportunities from a sustainability perspective.
- Adopt appropriate due diligence measures to prioritize, assess, and identify actual and potential risks related to human rights and environmental adverse impacts.
- Implement systems for managing and collecting information from suppliers which consider sustainability issues that are material to the Organization.
- Regularly review and, where appropriate, update and improve procurement processes to support alignment with the principles set out in the Code of Conduct for Business Partners.
- Establish a pre-assessment and identification system for Relevant Suppliers that takes into consideration and evaluates aspects such as the supplier's economic relevance for Turner, as well as social, environmental or governance aspects relating to the supplier in question, including in turn the pre-assessment of potential risks related to country risk, sectorial risks or product/service type risks, among others.
- Collaborate with suppliers that align with Turner's sustainability standards, and endeavor to exclude those that are considered to have a high likelihood of causing severe human rights or environmental impacts.
- Collect information on material IROs in order to report as requested to comply with commitments regarding information transparency.
- Inform Relevant Suppliers and contractors about the Organization's sustainability commitments.
- Systematically evaluate Relevant Suppliers and, in the event that shortcomings are observed in terms of sustainability or these suppliers are not aligned with the minimum internal principles established by the Organization, corrective measures will be agreed with them to resolve these shortcomings within

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the stipulated period of time. If these shortcomings are not corrected, the Organization will consider the possibility of suspending or terminating the commercial or business relationship, after considering the adverse impacts that could potentially arise from this circumstance.

- Recurrently evaluate the sustainability behavior of suppliers in relation to issues such as health and safety, respect for human rights and protection of the environment (decarbonization, pollution, biodiversity, water resources or circular economy). Heightened attention is given to suppliers with low or medium but manageable sustainability risks.
- Promote collaboration with suppliers to drive innovation in order to seek technological solutions that contribute to the decarbonization of Turner's Supply chain.
- Raise awareness among the Members of the Organization and tier-1 suppliers regarding compliance with the principles established in this Policy and the relevance of their role in the Turner Supply chain and procurement so that they, in turn, extend this commitment to tier-2 suppliers.
- Establish measures to avoid delays in payments to suppliers, as well as to resolve disputes or claims related to them. With regard to payments to suppliers, the payment deadlines provided for in applicable legislation will be complied with.

### CONTRACTING AND SUPPLY PROCESSES

Appropriate measures are adopted in connection with the Basic Principles of Action referred to above and to support their effectiveness and adopt appropriate due diligence measures, within the scope of procurement and supply processes with Relevant Suppliers. These measures include the following:

- **Approval:** the responsible Supply Chain management model begins with a process of approval of Relevant Suppliers in which compliance with the core criteria established by Turner and its Group companies to form part of their Supply Chains is evaluated, considering, through external evaluation platforms, questionnaires or computer platforms, not only the economic and technical aspects, but also different aspects related to sustainability such as environmental certifications, quality or adherence to international standards on human rights, in such a way that the suitability of Relevant Suppliers can be evaluated to align with the objectives and principles established in this Policy and to facilitate the identification, prevention and management of potential Supply Chain impacts.
- **Analysis:** Contracted Relevant Suppliers subsequently pass through an analysis phase that forms part of the management and continuous improvement system. For these purposes, Relevant Suppliers may be subject to spot audits on an as-needed basis, conducted both internally and by independent third parties, which seek to support compliance with the contractual commitments undertaken by suppliers and providers, identify potential non-compliances and implement, where appropriate, corrective or management measures adapted to the specific circumstances in each case that may ultimately lead to the immediate termination of the contractual relationship.

### GOVERNANCE

This Policy includes the basis of Turner's governance in sustainability matters as established in the Turner ESG Strategy with projection onto the Group. In this regard, consideration is given to the competences and functions attributed to, on the one hand, the Board of Directors and the Audit and Sustainability Committee, and on the other hand, the Sustainability Directorate and the Governance and Compliance Committee.

### WHISTLE-BLOWING AND COMPLAINTS CHANNELS

All Members of the Organization and, in general, authorized persons who are aware of or have reasonable suspicion of any breach of the commitments undertaken in this Policy must report said breach through the channels provided for this purpose, in accordance with the provisions established in the Code of Conduct.

### REACTION TO NON-COMPLIANCE

Failure to comply with the provisions of this Policy puts Turner and the Group companies at risk and may be subject to legal action.

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In the event of any breach of the provisions of this Policy, Turner Group entities will react immediately as provided in the applicable regulations, implementing the legitimate measures available to them.

Potential breaches of this Policy may be communicated through the different means available to Turner entities in their management systems or through the Turner reporting channels.

### APPROVAL, DISSEMINATION AND ENTRY INTO FORCE

This Policy will be applicable after its approval by the Executive management team on the date indicated at the beginning of this document, and shall be of mandatory application from that moment forward, without prejudice to the fact that Turner and the Group companies may avail themselves of the deadlines provided for in the applicable regulations with respect to the enforceability of corporate sustainability due diligence obligations. The Policy shall be available on the Company's corporate website ([www.turnerconstruction.com](http://www.turnerconstruction.com)) and shall be communicated to all companies in the Group.

### ADDITIONAL CONSIDERATIONS

Although this Policy may be translated into different languages, the official version thereof, for the purposes of interpretation, shall be the English version.