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Company Registration No.: 0107558000482 www.bam.co.th

Bangkok Commercial Asset Management Public Company Limited

Policy on Material Transactions

The Board of Directors' Meeting No. 7/2026 on May 8, 2026, resolved to approve the revision of the Policy on Material Transactions Constituting the Acquisition or Disposal of Assets in order to enhance the effectiveness of the Company's management and align with the standards applicable to companies listed on the Stock Exchange of Thailand. Therefore, the previous Policy on Material Transactions Constituting the Acquisition or Disposal of Assets shall be repealed and replaced with this Policy, which shall serve as a guideline for directors, executives, and other relevant persons involved in the Company's material transactions, as follows:

1. Repeal of the Notification

The Policy on Material Transactions Constituting the Acquisition or Disposal of Assets dated December 6, 2019 shall be repealed and replaced by this Policy.

2. Principles and Rationale

The Company recognizes the importance of maintaining a policy governing its material transactions and is committed to ensuring that the disclosure of information and the approval of such transactions are carried out accurately, completely, and on a reasonable basis. This is to promote transparency in the Company's management and ensure that its operations are subject to proper oversight and accountability. Accordingly, the Company has established this Policy in accordance with the criteria prescribed under the notifications of the Capital Market Supervisory Board governing material transactions.

3. Objectives

3.1 To ensure transparent corporate management and prevent the transfer of benefits.

3.2 To establish clear guidelines for the approval of material transactions.

3.3 To protect the interests of shareholders as a whole and ensure that shareholders are provided with adequate information regarding material transactions.

4. Definitions

"Company" means Bangkok Commercial Asset Management Public Company Limited.

"Subsidiary" shall have the same meaning as defined in the notification of the Securities and Exchange Commission concerning the definitions set forth in the notifications relating to the issuance and offering of securities.

"Material Transaction" means any transaction with a transaction size that is considered material, including the following:

(1) the acquisition or disposal of assets, whether such assets belong to the Company or its subsidiary;

(2) the transfer or waiver of rights or benefits, including the waiver of any claim against a person responsible for causing damage to the Company, whether such rights or benefits are related to the assets of the Company or its subsidiary.

(3) the execution, amendment, or termination of any agreement relating to the lease or hire-purchase of a business or assets, in whole or in part, whether such business or assets are operated or owned by the Company or its subsidiary;

(4) the granting of loans or credit facilities, the provision of guarantees, the undertaking of any juristic act that results in the Company assuming additional financial obligations in the event that a third party lacks liquidity or is unable to repay its debt, or the provision of any other form of financial assistance to any person, whether such transaction is undertaken by the Company or its subsidiary.

This also includes any transaction that is intended to have, or in substance has, the characteristics of a Material Transaction, as well as any other transaction of a similar nature.

"Entering into a Transaction" means entering into, or agreeing to enter into, any contract, agreement, arrangement, or understanding, whether directly or indirectly, for the purpose of effecting the acquisition or disposal of assets, the transfer or waiver of rights, benefits, or claims, the execution, amendment, or termination of any agreement relating to the lease or hire-purchase of a business or assets, the granting of loans or credit facilities, the provision of guarantees, or the undertaking of any juristic act binding the Company.

"Guidelines" means the Guidelines for Material Transactions.

5. Criteria for Material Transactions

5.1 Material Transactions shall be conducted in compliance with the Securities and Exchange Act, the notifications of the Capital Market Supervisory Board governing material transactions, as well as other applicable rules and regulations of the Securities and Exchange Commission ("SEC") and/or the Stock Exchange of Thailand ("SET").

5.2 Where the Company or its subsidiary enters into a transaction and, upon consideration in accordance with the criteria prescribed in the Guidelines, such transaction constitutes a Material Transaction, the Company shall comply with the requirements applicable to the relevant level of materiality as prescribed in the Guidelines

6. Roles and Responsibilities

6.1 The business unit entering into a transaction shall be responsible for complying with the criteria prescribed in the Guidelines as follows:

6.1.1 Determining whether the proposed transaction constitutes a Material Transaction.

6.1.2 Where the transaction is determined to constitute a Material Transaction, calculating the transaction size in accordance with the prescribed criteria.

6.1.3 Taking the required actions based on the calculated transaction size by coordinating with the Secretary to the Board of Directors, the Company Secretary, and/or other relevant functions, as applicable, in relation to the submission of the transaction to the Audit Committee and the Board of Directors, the disclosure of information to the Stock Exchange of Thailand ("SET"), the obtaining of shareholders' approval, and the reporting of progress, as prescribed in the Guidelines.

6.2 The Corporate Governance and Compliance Department shall be responsible for overseeing and providing advice to all business units to ensure compliance with this Policy and the prescribed Guidelines.

6.3 The Secretary to the Board of Directors, the Company Secretary, and/or other relevant functions shall coordinate with the business unit entering into the transaction in relation to the submission of the transaction to the Audit Committee and the Board of Directors, the disclosure of information to the SET, the obtaining of shareholders' approval, and the reporting of progress, as applicable, in accordance with the criteria prescribed in the Guidelines.

7. Policy Review

The Corporate Governance and Compliance Department shall review this Policy at least once a year. In the event of any revision, the proposed amendments shall be submitted to the Corporate Governance for Sustainability Committee for its review and recommendation, and subsequently to the Board of Directors for approval.

This policy shall be effective from 1 July 2026 onwards.

Announced on 1 July 2026.

-Signed by-

(Mrs. Tongurai Limpiti)

Chairman of the Board

Compliance Division

Compliance Department

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