



May 2024

Brookfield is committed to maintaining an environment that is safe and respectful; our shared success depends on it. Accordingly, we do not tolerate workplace discrimination, violence or harassment.

All directors, officers and employees have a duty to ensure a safe and respectful workplace environment where high value is placed on integrity, fairness and respect. In order to achieve this goal, Brookfield has established this Positive Work Environment Policy which relies on everyone in our workplace not only to refrain from, identify and report workplace discrimination, violence and harassment as it occurs.

If you experience or become aware of what you believe to be discrimination, violence or harassment in the workplace, as defined in this Policy, you are expected to report it either to your supervisor, human resources, or to Brookfield's reporting hotline. If you or someone you know at Brookfield is in immediate danger of serious bodily harm, first call local law enforcement authorities and then report the incident following the process explained herein.

Complaints of workplace discrimination, violence or harassment will be taken seriously. If you are found to be discriminating against, acting or threatening to act violently towards, or harassing any individual at Brookfield, or if you knowingly condone the discrimination of, violence towards, or harassment of another individual at Brookfield, you will face corrective action up to and including immediate termination.

A culture of reporting when it comes to workplace discrimination, violence and harassment is essential for us as a company to maintain a safe and respectful workplace. While we reserve the right to take corrective action if you knowingly make a false accusation about an innocent party, you will not face retaliation for making a good faith report or assisting in the investigation of a complaint.

For the purposes of this Policy, “Work Environment” or “Workplace” means Brookfield’s places of business and business-related electronic communications, and outside Brookfield’s places of business when conducting business (for example, all places

physical acts such as punching, hitting, kicking, pushing, damaging property or throwing objects;
The attempted use of physical force against or by

i) Sexual Harassment

Sexual Harassment is unwelcome sexual behavior (physical, spoken or written) which could reasonably be expected to make a person feel offended, humiliated, or intimidated and includes:

engaging in a course of hostile, humiliating or abusive behavior against a person in the Workplace because of sex, sexual orientation, gender identity or gender expression; or

making a sexual solicitation of or advance toward an Employee in which the person making the solicitation or advance knows or ought reasonably to have known that the solicitation or advance is unwelcome; and in particular, where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to such Employee.

Sexual Harassment, by definition, is coercive and one-sided, and persons of any gender can be victims of it. Harassers can also be anyone in the workplace. A supervisor, a supervisee, or a coworker can all be harassers. Anyone else in the workplace can also be harassers including an independent contractor, contract worker, vendor, client, or customer.

Sexual harassment is not limited to the physical workplace. It can occur while employees are traveling for business or at Company sponsored events or parties. Calls, texts, emails, and social media usage by employees or covered individuals can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices, or during non-work hours, if such conduct impacts an individual's work or the workplace.

ii) Psychological Harassment

Psychological Harassment includes hostile, humiliating or abusive behavior that manifests itself in the form of conduct, verbal comments, actions or gestures characterized by the following four criteria:

Repetitive;

Hostile or unwanted;

Bullying may include, by way of example:

- Physical or psychological threats;
- Exclusion or social isolation, or the encouragement of others to turn against the targeted person;
- Unreasonable interference with a person's ability to do his or her work; or
- Personal attacks.

Employee Responsibilities

- Understand and comply with this Policy;
- Behave in a manner consistent with creating a positive Work Environment and maintain positive interactions at work,
- Report incidents of Workplace Discrimination, Violence or Harassment experienced directly or witnessed;
- Immediately report any violent or potentially violent incident as outlined in this Policy;⁴
- Participate and cooperate in any investigations of Workplace Discrimination, Violence or Harassment if, and to the extent required, by the circumstances of the investigation; and
- Understand and follow organizational procedures to prevent Discrimination, Violence and Harassment, including addressing it as soon as you are aware.

Supervisor Responsibilities

All supervisors and managers (i.e., Employees to whom other Employees report) should strive to create a Work Environment in which Employees feel comfortable reporting incidents and raising concerns or questions about Brookfield's policies. This includes:

- Understanding how to recognize and handle a Workplace Discrimination, Violence or Harassment incident or complaint so that it does not go unaddressed;
- Managing interpersonal conflicts within the team before they escalate;
- Encouraging Employees to report incidents or complaints of Discrimination, Violence or Harassment, and escalating all complaints to Human Resources (even those about his/her own behavior);
- Reporting any suspected Workplace Discrimination, Violence or Harassment to Human Resources immediately; and
- Participating and cooperating in any investigations of Workplace Discrimination, Violence and Harassment if, and to the extent required, by the circumstances of the investigation.

Supervisors and managers can be disciplined if they personally engage in sexually harassing or discriminatory behavior. Supervisors and managers can also be disciplined for failing to report suspected Harassment or allowing Harassment to continue after they know about it.

⁴ In the event of an extreme or imminent threat of physical harm to yourself or any person, you should contact law enforcement (e.g., Police) using emergency procedures.

Senior Management Responsibilities

The senior executives of Brookfield Asset Management Ltd. (the “Senior Executives”) are responsible for taking reasonable measures to:

- Establish a “tone from the top” reflective of a positive Work Environment;
- Protect Employees from Workplace Discrimination, Violence and Harassment;
- Promote a Work Environment where Employees are comfortable reporting violations;
- Maintain a program where complaints are dealt with in an appropriate and timely manner, as required; and
- Provide training as deemed appropriate or where required by law.

Internal reporting is important to Brookfield and it is both expected and valued. If you experience or witness behavior that you believe may violate this Policy, you are required to promptly report it.

Reports should in the first instance be made to your supervisor or manager, who will ensure that the

of the Workplace. It is expected that anyone participating in an investigation keep that fact and any

disclosure is necessary for the purposes of investigating or taking corrective action with respect to the incident or complaint, is determined appropriate by Brookfield or is required by law.

Where required by law, records of the investigation

Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity, or gender expression, such as intentional misuse of an individual's preferred pronouns.

Employees may visit <https://calcivilrights.ca.gov/shpt/> to access online sexual harassment training resources.

Employees are encouraged to use the reporting process set forth in the Company's Positive Work Environment Policy. Employees in California may also report incidents of discrimination or harassment to the State Civil Rights Department (CRD) at 800-669-4000 or online at <https://calcivilrights.ca.gov/contactus/>. Employees or job applicants who believe that they have been sexually harassed or retaliated against may file a complaint of discrimination with CRD within three years of the last act of harassment or retaliation. Employees can contact the agency directly for information about its processes and time limits. If an employer is found to have violated the law, CRD may seek court orders to change an employer's policies and practices, punitive damages, and attorney's fees and costs if it prevails in litigation. Employees can also pursue the matter through a private lawsuit in civil court after a complaint has been filed with CRD and a Right-to-Sue Notice has been issued.

The Company is committed to maintaining a workplace free from harassment and discrimination consistent with the Positive Work Environment Policy and applicable law. Under the New York State Human Rights Law, it is illegal to discriminate based on sex, sexual orientation, gender identity or expression, age, race, creed, color, national origin, military status, disability, pre-disposing genetic characteristics, familial status, marital status, criminal history, or status as a victim of domestic violence. The purpose of this appendix is to provide additional information and resources to Company employees concerning New York law.

Respecting an individual's gender identity is a necessary step in establishing a respectful workplace. Understanding gender diversity is essential to recognizing sexual harassment because discrimination based on sex stereotypes, gender expression and perceived identity are all forms of sexual harassment. The gender spectrum is nuanced, but the three most common ways people identify are cisgender, transgender, and non-binary.

Sexual harassment is unlawful when it subjects an individual to inferior terms, conditions, or privileges of employment. Harassment does not need to be severe or pervasive to be illegal. It can be any harassing behavior that rises above petty slights or trivial inconveniences. The following describes some of the types of acts that may be unlawful and can contribute to a hostile work environment.

- Physical acts of a sexual nature without the employee's consent such as unwelcome touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee's body, or poking another employee's body;
- Unwanted sexual comments, advances, or propositions;
- Sexually oriented gestures, noises, remarks or jokes, or questions and comments about a person's sexuality, sexual experience, or romantic history including remarks made over virtual platforms and in messaging apps, whether used in the office or while working from a different location;
- Sex stereotyping;
- Sexual or discriminatory displays or publications anywhere in the workplace, including a virtual or remote workspace where such materials are visible in the background; and
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity, or gender expression, such as intentional misuse of an individual's preferred pronouns.

Retaliation is unlawful and can be any action that could discourage a worker from making a complaint or participating in an investigation under this Policy, or that punishes those who have come forward.

There are several methods of bystander intervention that can be used when anyone witnesses harassment or discrimination and wants to help. Though not exhaustive, and dependent on the

circumstances, these methods can serve as a brief guide of how to react when witnessing harassment in the workplace.

1. A bystander can interrupt the harassment by engaging with the individual being harassed and distracting them from the harassing behavior;
2. A bystander who feels unsafe interrupting on their own can ask a third party to help intervene in the harassment;
3. A bystander might check in with the person who has been harassed after the incident, see how they are feeling and let them know the behavior was not ok; and
4. If a bystander feels safe, they can confront the harassers and name the behavior as inappropriate.

When confronting harassment, physically assaulting an individual is never an appropriate response.

The Company encourages employees to utilize the internal process outlined in the Positive Work Environment Policy to report sexual harassment. Employees and other covered individuals may also choose to pursue legal remedies with the following governmental entities. While an attorney is not required to file a complaint with a governmental agency, employees may seek the legal advice of a private attorney at their own expense.

New York State Division of Human Rights:

The New York State Human Rights Law (HRL), N.Y. Executive Law, art. 15, § 290 et seq., applies to all employers in New York State and protects employees and other covered individuals, regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed either with the New York State Division of Human Rights (DHR) or in New York State Supreme Court.

Complaints of sexual harassment filed with DHR may be submitted any time within three years of the harassment. If an individual does not file a complaint with DHR, they can bring a lawsuit directly in state court under the Human Rights Law, within three years of the alleged sexual harassment. An individual may not file with DHR if they have already filed a HRL complaint in state court.

Complaining internally to the Company does not extend your time to file with DHR or in court. The three years are counted from the date of the most recent incident of harassment.

You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR. DHR will investigate a complaint and determine whether there is probable cause to believe that sexual harassment has occurred. Probable cause cases receive a public hearing before an administrative law judge. If sexual harassment is found at the hearing, DHR has the power to award relief. Relief varies but it may include requiring an employer to take action to stop the harassment, or repair the damage caused by the harassment, including paying of monetary damages, punitive damages, attorney's fees, and civil fines.

DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit: www.dhr.ny.gov. You may also

Contact the Local Police Department

If the harassment involves unwanted physical touching, coerced physical confinement, or coerced sex acts, the conduct may constitute a crime. Those wishing to pursue criminal charges may contact their local police department.

2. Please describe what happened and how it is a



iii) Notify Your Supervisor and/or Human Resources Immediately

Employees must take all incidents of Workplace Violence, including threats, seriously, and are required to report all incidents of Workplace Violence of which they are aware.

Employees must also report a threat they believe might be carried out against an Employee in the Workplace by an outside source. Any Employee who witnesses or experiences Workplace Violence is required to inform human resources as soon as reasonably possible following an incident of Workplace Violence.

When determined necessary, Employees will receive the adequate training to prevent and detect relevant Workplace risk factors, and to understand what to do if they experience or witness Workplace Violence.

AUSTRALIA

In accordance with Australian law and under the Code, employees must not engage in the sexual harassment of others.

Sexual Harassment is:

- a) *an unwelcome sexual advance;*
- b) *an unwelcome request for sexual favours; or*
- c) *other unwelcome conduct of a sexual nature,*

which makes

An individual who sexually harasses is primarily re

