



November 2023

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 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

Integrity, fairness and respect are hallmarks of our culture, and we are committed to a positive, open and inclusive work environment free from discrimination, violence and harassment. Each of us has a personal responsibility to our colleagues and to Brookfield to take an active role in achieving a safe and respectful work environment.

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 where Employees perform their duties (including but not limited to Company buildings and Company grounds), Company-sponsored functions, recreational or social events, and travel, or Company business over the telephone and internet/intranet or any other form of communication).

Brookfield strictly prohibits Workplace Discrimination, Violence and Harassment (as defined below). This Policy outlines our commitment to providing a Workplace free of Discrimination, Violence and Harassment and summarizes the responsibilities of Employees to understand: (i) what constitutes Workplace Discrimination, Violence and Harassment, respectively; (ii) their obligations to maintain an environment where these behaviors are not tolerated; and (iii) how to report incidents following proper procedures. If

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.

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 information is properly handled and escalated as necessary. In the alternative, reports may be made to your local Human Resources (HR) contact or through our reporting hotline (the “Reporting Hotline”). The Reporting Hotline is managed by an independent third party and allows for anonymous reporting in English and other languages. The Reporting Hotline is available toll-free; 24 hours per day, 7 days per week. Please see [Appendix G](#) for the Reporting Hotline phone numbers by jurisdiction.

⁵In 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.

Handling of Incidents and Complaints

False Claims of Workplace Discrimination, Violence or Harassment

Allegations made in bad faith may lead to corrective action, up to and including termination of employment.

No Reprisal or Retaliation

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:

iii) Notify Your Supervisor and/or Human Resources Immediately

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In Australian law and under the Code, employees must not engage in the sexual harassment of their colleagues.

Sexual harassment is defined as:

- a) unwelcome sexual advances;
- b) any form of sexual harassment;
- c) other unwelcome conduct of a sexual nature.

which makes a person feel offended, humiliated or intimidated, or which anticipates the possibility of that person being so treated.

In Australia, sexual harassment is unlawful under the Sex Discrimination Act 1984 (SDA).

The Act defines the nature and circumstances in which sexual harassment is unlawful. It is unlawful for a person to be victimised for, among other things, making, or proposing to make, an allegation of sexual harassment to the Human Rights Commission or make an allegation of sexual harassment.

Examples of sexually harassing behaviour under the Act include:

- x unwelcome touching;
- x staring or leering;

offensive comments or jokes, or any other conduct of a sexual nature that is intended to harass or offend a person.

An individual who sexually harasses is primarily responsible for the sexual harassment under the Act. However, it is also important to note that Australian courts have found that sexual harassment committed by Australian employees or agents of Brookfield can also lead to Brookfield being liable. Under the Act, as an employer, Brookfield is liable for acts of sexual harassment committed by its Australian employees or agents in connection with their duties unless "all reasonable steps" were taken by Brookfield, to prevent the sexual harassment occurring. This is called "vicarious liability".

Australia – 1800-152-863
Barbados – 1-833-388-0834

Ireland- 1800-946-551
Japan - -012-099-