

Brookfield Asset Management

Anti-Bribery and Corruption Program Summary

Brookfield is committed to conducting its business activities with the utmost honesty and integrity and in compliance with all legal and regulatory requirements. We do not pay bribes in furtherance of our business and expect that employees will not do so on our behalf. This commitment comes from the highest levels of management, and employees are expected to meet this standard.

Brookfield's Anti-Bribery and Corruption ("ABC") Policy outlines our zero-tolerance approach towards bribery and prohibits employees from offering, promising, giving or receiving anything of value to improperly influence a decision or to gain an improper or unfair advantage in promoting, enhancing, obtaining or retaining business. The ABC Policy also includes guidance on ensuring that joint venture partners, agents, contractors, and other third-parties that we engage, do not pay bribes on our behalf and for reporting suspected violations. Employees who violate the ABC Policy are subject to disciplinary action, up to and including termination of employment and, if warranted, legal proceedings.

Brookfield has implemented an ABC Program that is designed to prevent and detect bribery and corruption, as well as comply with the various bribery-related laws and regulations in the jurisdictions in which we operate. The ABC Program includes written policies and procedures related to program governance, tone at the top, risk assessment, due diligence for acquisitions and third-parties, training, internal controls, and reporting and monitoring processes. The ABC Program is regularly reviewed and tested, with improvements implemented, as required.

To ensure Brookfield Asset Management employees are aware and fully understand the ABC Policy, all employees are required to complete an annual ABC training course that is administered by a third-party provider.