

Brookfield

Positive Work Environment Policy

Brookfield Asset Management Ltd.
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Overview

Brookfield (as defined below) is committed to maintaining an environment that is professional 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 professional 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 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 professional 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.

Commitment to a Positive Work Environment

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 professional and respectful work environment.

Scope of the Policy

This Positive Work Environment Policy (“Policy”) applies to all directors, officers, employees and temporary workers (collectively, “you” or “Employees”) of Brookfield Asset Management Ltd. (“BAM”) and its subsidiaries (collectively, “we,” “us,” “our,” “Brookfield” or the “Company”).

Investee companies that we control must have policies in place to ensure that our standard on promoting a positive Work Environment (as defined below) is applied broadly across the organization. To the extent a newly acquired investee company does not have policies that meet this standard, such investee company must implement suitable policies as part of the process to onboard the investee company into Brookfield. In the case of an investee company where Brookfield does not have voting or management control, you are still expected to exert any influence we have over the non-controlled investee company to encourage the adoption of a positive work environment policy (or similar policy) consistent with this Policy’s objectives.

All Employees are required to comply with the personal behavior and positive Work Environment requirements set out in the Company’s Code of Business Conduct and Ethics. This Policy supplements and expands on those provisions and is intended to raise awareness of our approach to fostering a positive Work Environment among Employees. You must also comply with applicable laws, rules and regulations governing the subject matter of this Policy. In the event that a local law, rule or regulation (collectively, “Local Laws” and each a “Local Law”) in a jurisdiction in which we conduct business is more restrictive than this Policy, or where this Policy is inconsistent with Local Laws, the Local Laws will apply. For further guidance, please refer to any country-specific appendices attached to this Policy which are applicable to your workplace.

This Policy reflects the standards that Brookfield expects its business associates, partners, agents, contractors, third-party service providers and consultants (collectively, “Third Parties” or individually a “Third Party”) to adhere to when interacting with Brookfield and its Employees.

For the purposes of this Policy, a “business associate,” “partner,” “agent,” “contractor,” “third party service provider” or “consultant” means an individual or entity, including a subcontractor, that provides and receives payments for services or goods related to any aspect of our business.

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).

No Tolerance for Workplace Discrimination, Violence and Harassment

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 you violate this Policy, you will face corrective action up to and including the termination of your employment with Brookfield.

Definitions of Workplace Discrimination, Violence and Harassment

Workplace Discrimination means the differential treatment of an individual or group, such as the denial of an opportunity, based on any characteristic protected by applicable law, including, without limitation¹:

- race
- color
- sex, gender (including pregnancy, pregnancy related conditions, breastfeeding and family/caregiver responsibilities) or gender identity
- marital status
- national origin
- religion
- political opinion
- age
- physical or mental disability
- sexual orientation (including intersex status)
- experiencing family or domestic violence
- caregiver responsibilities for a family member
- language ability
- mental health condition

In some circumstances, Workplace Discrimination may be unintentional. Regardless of intent, such conduct is not acceptable, violates this Policy and may also constitute a violation of applicable law.

Workplace Violence means an action (oral, written or physical) which causes, is intended to cause, is capable of causing, or could reasonably be interpreted as a threat to cause death or bodily injury to oneself or others, or property damage². Workplace Violence includes, but is not limited to, the following behaviors:

- the use of physical force against or by a person that causes or could reasonably cause physical injury, including physical acts such as punching, hitting, kicking, pushing, damaging property or throwing objects;
- the attempted use of physical force against or by a person that could have reasonably caused physical injury; and
- an action, statement or behavior (or series of actions, statements or behaviors) reasonably believed to be a threat of physical harm or a threat to safety or security in the Workplace. This can include:
 - bringing or threatening to bring a weapon of any kind into the Workplace; or

¹ Please review the attached appendices for additional information specific to certain work locations including California, New York, and others.

² In accordance with Local Law, Appendix E outlines the definition of Workplace Violence applicable under the laws of Luxembourg. In addition, Appendix D includes variation relevant to Florida and Texas.

- the potential for domestic violence to have an impact on the Workplace.³

Where required by Local Law, risk assessments regarding Workplace Violence will be conducted in accordance with the process outlined in the attached Appendix F.

Workplace Harassment means conduct which a reasonable person ought to know is unwelcome and includes conduct (e.g., comments and actions) which would be perceived by a reasonable person as being hostile, humiliating or abusive or cause them torment. Under the policy, Harassment covers a wide range of conduct, and includes Sexual Harassment, Bullying and Psychological Harassment (as defined below). It may be targeted at a person or group of people because of a personal dislike or personality conflict, and not solely because of race, religion, color, sexual orientation, or any other prohibited grounds.

Workplace Harassment may be expressed through offensive oral, written or physical conduct that singles out a person to the detriment or objection of that person because of the person's protected characteristics. Workplace Harassment may be implicit or explicit and includes Sexual Harassment, bullying, teasing, offensive jokes, innuendos, displaying or circulating offensive pictures or materials, offensive or intimidating conversations, making fun of or defaming a member of a particular religion, race, gender, etc. or similar forms of behavior.

Workplace Harassment does not include reasonable actions taken by the Company relating to the management and direction of Employees or the Workplace. Indeed, Workplace Harassment is not to be confused with the normal exercise of the Company's rights with respect to its Employees, in particular its right to assign tasks, do a follow-up and/or monitor the work of an Employee whose output is unsatisfactory, conduct performance reviews and appraisals, reprimand or impose disciplinary sanctions, and/or investigate alleged misconduct. Insofar as the Company does not exercise these rights in an abusive or discriminatory manner, or outside the normal conditions of employment, the Company's actions and those of its Employees do not constitute Workplace Harassment. Workplace Harassment does not include differences of opinion or minor disagreements between co-workers.

In some circumstances, Workplace Harassment may be unintentional. Regardless of intent, such conduct is not acceptable, violates this Policy and may also constitute a violation of applicable law.

For clarity, the following are three specific types of Workplace Harassment included under this Policy:

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 may include:

- 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

³ Domestic violence is an act of violence committed against an individual by that individual's spouse or family member. If you become aware that domestic violence may occur in the Workplace, you must report your concern using this Policy.

- 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;
- affects the person's dignity or psychological integrity; and
- results in a harmful Work Environment.

Psychological Harassment may come from a superior, colleague, a group of colleagues, a client or a supplier. A single serious incident of such behavior may also constitute Psychological Harassment if it undermines the person's dignity or psychological or physical integrity and if it has a lasting harmful effect.

iii) Bullying

Bullying includes repeated, malicious, severe or pervasive oral, written or physical mistreatment that a reasonable person would consider offensive, degrading or humiliating to one or more individual(s) in the Workplace. A bully need not be in a position of authority and, unlike Discrimination, the Bullying conduct need not relate to the targeted individual's status as a member of a legally protected group. Bullying is characterized by willfully targeting another person or persons and socially degrading the person(s), or engaging in similar behavior, that causes or reasonably ought to have been expected to cause another person(s) to develop deep seated fears and/or adverse health effects that would affect a reasonable person's ability to function normally.

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 their work; or
- personal attacks.

Employee, Supervisor and Senior Management Responsibilities

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 their 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.

Senior Management Responsibilities

The senior executives of Brookfield (the "Senior Executives") are responsible for taking reasonable measures to:

- establish a "tone from the top" reflective of a positive Work Environment;
- address known incidents of 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. Please see Appendix K for the Reporting Hotline phone numbers by jurisdiction.

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.

Reporting Incidents and Complaints

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; 24 hours per day, 7 days per week. Please see [Appendix K](#) for the Reporting Hotline contact information by jurisdiction.

Responding to Reported Incidents and Complaints

Handling of Incidents and Complaints

Brookfield takes all incidents and complaints of Workplace Discrimination, Violence and Harassment seriously. Incidents or threats of Workplace Violence and/or Harassment may also be reported to law enforcement, as appropriate.

Every report of Workplace Discrimination, Violence or Harassment will be assessed and, where appropriate or as required by law, an investigation, including discussions with all applicable parties, will be undertaken. The Company may request or obtain documents related to the reported concerns. The Company will determine who will conduct the investigation depending on the circumstances. In some circumstances, the Company may, at its discretion, retain an independent third party to conduct the investigation.

When an investigation has taken place, if appropriate and as required by law, the complainant and respondent will be informed of the results of the investigation and any corrective action that has been or will be taken as a result of the investigation. In such cases, the results of the investigation will be provided within a reasonable period of time after completion of the investigation.

Confidentiality and privacy will be respected to the extent possible, subject to the need to conduct a full, fair and respectful investigation and to ensure the safety of Employees and comply with applicable law. Brookfield will take any reasonable action deemed necessary for the protection of Employees and of the Workplace. It is expected that anyone participating in an investigation keep that fact and any details discussed during the investigation confidential. A breach of this requirement for confidentiality may lead to serious consequences, up to and including termination of employment.

Precautions During Investigations

The Company will also take reasonable precautions to protect the involved Employees during the investigation, including but not limited to moving involved Employees to different locations, floors or offices during the investigation. Precautionary measures, if warranted, may be in place until an ultimate determination is made related to the investigation, and if required, corrective actions are applied.

Workplace Discrimination, Violence or Harassment Involving a Third Party

If an incident of Workplace Discrimination, Violence or Harassment involves a Third Party in the Workplace (e.g. client, contractor, visitor, etc.), the above process will apply. Where deemed appropriate, the Company will report the incident to that person's employer and any other parties which the Company believes it is appropriate to report to under the circumstances. The Company will take reasonable steps, including removing the individual from its property and/or involving law enforcement as appropriate, to ensure the protection of all Employees and the Workplace.

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

Brookfield will not tolerate retaliation against anyone who has made a complaint or report based on the reasonable good faith belief that a violation of this Policy has occurred or may occur in the future, or has cooperated with an investigation regarding a violation or possible violation of this Policy. Any such person will be protected from any form of retaliation.

A reprisal or retaliation can include a demotion, an unwanted transfer or a denial of opportunities within the Company. It can include 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. Any person who believes that they have been retaliated against should immediately contact their local HR representative or the Reporting Hotline.

Employees who engage in reprisals or threats of reprisals, or who knowingly make a false complaint or otherwise abuse this Policy, may be disciplined up to and including immediate termination of employment and, if warranted, legal proceedings may be undertaken. Such discipline is not a breach of this Policy.

Record Keeping

At the conclusion of an investigation, a written report of the findings may be prepared as appropriate or where required by law. The report or its findings will not be disclosed to any person unless the 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 will be kept, including a copy of the complaint or details of the incident, a record of the investigation (including notes taken), a copy of the investigation report, a summary of any communications of the results of the investigation to the parties involved, and, if applicable and/or appropriate, a copy of the corrective action taken to address the complaint or incident of Workplace Discrimination, Violence or Harassment and the steps taken to protect Employees and prevent a recurrence. Records will also be kept in accordance with applicable laws.

Enforcement and Corrective Action

Brookfield will take corrective action with respect to any Employee found to have breached this Policy in a manner that is fair, consistent and that reflects the nature and facts of the violation. Anyone subject to this Policy who violates it may face corrective action. Corrective action may include counselling, training, a written warning, transfer, demotion, reductions in short-term or long-term compensation, suspension with or without pay, or termination of employment or the business relationship without notice. The incident will, if substantiated, be documented in the offending person's file.

If we discover a violation of any applicable laws, we may refer the matter to the appropriate authorities, which could lead to penalties, fines, imprisonment or other liability.

This Policy does not limit the Company's authority or ability to discipline or take other action for Workplace conduct that is found to be inappropriate, regardless of whether that conduct meets the definition of Workplace Discrimination, Violence or Harassment as documented in this Policy.

This Policy is not intended to and does not create a contract of employment for any specific duration or otherwise alter the nature of the employment relationship. In addition, nothing in this policy is intended or should be read to imply that independent contractors, including potentially temporary workers, have any employment relationship with the Company.

Approvals and Amendments

The board of directors of BAM and the Senior Executives have reviewed and approved this Policy. The Senior Executives are responsible for monitoring compliance with this Policy's provisions.

At a minimum, this Policy will be reviewed annually by the Company. Brookfield reserves the right, in its absolute discretion, to supplement, change, discontinue or amend its policies and procedures at any time without consultation with any Employee.

Any amendments to this Policy must be approved by the Senior Executives, together with any other procedures required by Local Law.

APPENDIX A

STATE SUPPLEMENT CALIFORNIA

The Company is committed to maintaining a workplace free from harassment and discrimination consistent with the Positive Work Environment Policy and applicable law. The purpose of this appendix is to provide additional information and resources to Company employees working in California.

The Company strictly prohibits and does not tolerate unlawful discrimination on the basis of:

- Race (including hair texture and protective styles)
- Color
- Sex, (including pregnancy, childbirth, breastfeeding or medical conditions related to pregnancy, childbirth or breastfeeding),
- Gender (including gender identity and gender expression)
- Marital status
- National origin
- Ancestry
- Religious Creed
- Age (40 and older)
- Physical disability
- Mental disability
- Medical condition
- Reproductive health decision making
- Genetic information
- Sexual orientation
- Military or veteran status

The Company also prohibits and does not tolerate unlawful harassment against employees who are perceived to have any of these characteristics or who associate with a person who has, or is perceived to have, any of these characteristics.

Sexual harassment is one form of unlawful harassment based on an individual's sex, sexual orientation or gender. Sexual harassment is also illegal and prohibited by the Company's Positive Work Environment Policy. Examples of conduct that may constitute sexual harassment include:

- Physical acts of a sexual nature without the employee's consent;
- 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.

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 800-884-1684 (voice), 800-700-2320 (TTY) 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.

APPENDIX B
STATE SUPPLEMENT
NEW YORK

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.

Gender Diversity

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.

Examples of Sexual Harassment

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

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.

Bystander Intervention

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.

Legal Protections and External Remedies

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 call the DHR sexual harassment hotline at 1(800) HARASS3 for more information about filing a sexual harassment complaint or to receive a referral to a volunteer attorney experienced in sexual harassment matters who can provide you with limited free assistance and counsel over the phone.

Information about filing a complaint with DHR can be found at dhr.ny.gov/complaint. The website has a digital complaint process that can be completed on your computer or mobile device. The website also has a complaint form that can be downloaded, filled out, and mailed to DHR and contains contact information for DHR's regional offices across New York State.

United States Equal Employment Opportunity Commission (EEOC):

The EEOC enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act, 42 U.S.C. § 2000e et seq. In general, private employers must have at least 15 employees to come within the jurisdiction of the EEOC. An individual can file a "Charge of Discrimination" (charge) with the EEOC anytime within 300 days from the most recent incident of harassment. There is no cost to file a charge with the EEOC. The EEOC will investigate the charge and determine whether there is reasonable cause to believe that discrimination has occurred. If the EEOC determines that the law may have been violated, the EEOC will try to reach a voluntary settlement with the employer. If the EEOC cannot reach a settlement, the EEOC (or the Department of Justice in certain cases) will decide whether to file a lawsuit. The EEOC will issue a Notice of Right to Sue permitting workers to file a lawsuit in federal court if the EEOC closes the charge, is unable to determine if federal employment discrimination laws may have been violated, or believes that unlawful discrimination occurred but does not file a lawsuit.

Federal courts may award remedies if discrimination is found to have occurred in violation of the law. Individuals may also obtain relief in mediation, settlement or conciliation.

The EEOC has district, area, and field offices where complaints can be filed. The EEOC may be contacted by calling 1-800-669-4000 (TTY: 1-800-669-6820), at www.eeoc.gov or via email at info@eeoc.gov.

If an individual files an administrative complaint with the New York State Division of Human Rights, DHR will automatically file the complaint with the EEOC to preserve the right to proceed in federal court.

Local Protections

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual may contact the county, city or town in which they live to find out if such a law exists. For example, employees who work in New York City may file complaints of sexual harassment or discrimination with the New York City Commission on Human Rights. The main office of the Law Enforcement Bureau of the NYC Commission on Human Right is located at 22 Reade Street, 1st Floor, New York, New York; and may be reached by calling 311 or (212) 306-7450; or visiting www.nyc.gov/html/cchr/html/home/home.shtml.

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.

New York Sexual Harassment Prevention Policy Complaint Form

If you believe that you have been subjected to sexual harassment, you may use this form to report your concerns by submitting it to your supervisor, manager or local Human Resources contact. This is, however, just one of multiple available channels to raise concerns. You may continue to report concerns verbally or in writing to your manager, human resources, and the Company's Reporting Hotline. Concerns may be reported anonymously to the Reporting Hotline, if preferred. You will not be retaliated against for filing a complaint or for raising such concerns in good faith.

The Company will promptly investigate all concerns pursuant to its policies and procedures, including the Positive Work Environment Policy and the New York Sexual Harassment Prevention Policy.

For additional resources, visit: ny.gov/programs/combating-sexual-harassment-workplace

COMPLAINANT INFORMATION

Name:

Work Address:

Work Phone:

Job Title:

Email:

Select Preferred Communication Method: Email Phone In-person

SUPERVISORY INFORMATION

Immediate Supervisor's Name:

Job Title:

Work Phone:

Work Address:

COMPLAINT INFORMATION

1. Your complaint of sexual harassment is made about:

Name:

Title:

Work Address:

Work Phone:

Relationship to you: Supervisor Subordinate Co-Worker Other

2. Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

3. Date(s) sexual harassment occurred:

Is the sexual harassment continuing? Yes No

4. Please list the name and contact information of any witnesses or individuals who may have information related to your complaint:

The last question is optional but may help the investigation.

5. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

Signature: _____

Date: _____

APPENDIX C
STATE SUPPLEMENT
ILLINOIS

The Company is committed to maintaining a workplace free from harassment and discrimination consistent with the Positive Work Environment Policy (PWEPE) and applicable law. Under Illinois law, employees have the right to be free from unlawful discrimination and sexual harassment. This means that employers may not treat people differently based on race, age, gender, pregnancy, disability, sexual orientation or any other protected class named in the Act. This applies to all employer actions, including hiring, promotion, discipline and discharge. Employees also have the right to reasonable accommodation based on pregnancy and disability. This means employees can ask for reasonable changes to their jobs if needed because they are pregnant or disabled. Finally, it is unlawful for employers to treat people differently because they have reported discrimination, participated in an investigation, or helped others exercise their right to complain about discrimination.

In addition to the reporting avenues identified in the PWEPE, employees working in Illinois may file complaints of sexual harassment with the government agencies listed below.

Illinois Department of Human Rights
555 W. Monroe Street, Suite 700
Chicago, IL 60601
312-814-6200
312-740-3953 (TTY)
Website: dhr.illinois.gov
Email: IDHR.Intake@illinois.gov

Chicago Commission on Human Relations
740 N. Sedgwick, 4th Floor
Chicago, IL 60654
312-744-4111
cchr@cityofchicago.org

U.S. Equal Employment Opportunity Commission (EEOC)
Chicago District Office
230 South Dearborn St., Suite 1866
Chicago, Illinois 60604
321-872-9744
866-740-3953 (TTY)
<https://publicportal.eeoc.gov/Portal/Login.aspx>

Employees may also call the Illinois Sexual Harassment and Discrimination Helpline at 1-877-236-7703 to speak with someone about their concerns.

APPENDIX D
STATE SUPPLEMENT
FLORIDA AND TEXAS

Workplace Violence

This State Supplement modifies the definition of workplace violence in the Company's Positive Work Environment Policy for employees who work in the state of Florida or Texas.

The Company prohibits the possession of weapons on Company property at all times. This prohibition does not extend firearms or ammunition stored in locked vehicles in a Company parking lot, provided all other requirements of the applicable law have been met, including proper licensure and storage. This exception does not extend to vehicles that are owned or leased by the Company or other Company property, including office buildings. All other terms of the Positive Work Environment policy shall apply.

APPENDIX E
COUNTRY SUPPLEMENT
LUXEMBOURG

The following definition of Workplace Violence will apply for Luxembourg.

Workplace Violence means an action (oral, written or physical) which causes, is intended to cause, is capable of causing, or could reasonably be interpreted as a threat to cause death or bodily or mental injury to oneself or others, or property damage. Workplace violence includes, but is not limited to, the following behaviors:

- The use of physical force against or by a person that causes or could cause physical injury, including physical acts such as punching, hitting, kicking, pushing, damaging property or throwing objects;
- The attempted use of physical force against or by a person that could have caused physical injury; and
- An action, statement or behavior (or series of actions, statements or behaviors) reasonably believed to be a threat of physical harm or a threat to safety or security in the workplace. This can include:
 - Bringing or threatening to bring a weapon of any kind into the workplace.
 - The potential for domestic violence to have an impact on the workplace.

APPENDIX F

COUNTRY SUPPLEMENT

CANADA AND SPAIN

The Company, in conjunction with any required internal or external advisors and the Company's joint health and safety committee ("JHSC") (or comparable committee or representative: in Spain, Comité de Seguridad y Salud) will conduct an assessment to identify relevant Workplace Violence risk factors. The Company will identify all factors that contribute to Workplace Violence by taking into account, at minimum, the following:

- the location and circumstances in which the work activities take place;
- the Employees' reports of Workplace Violence or the risk of Workplace Violence;
- the Company's experience in dealing with those factors and with Workplace Violence;
- the experience of employers in dealing with those factors and with violence in similar workplaces;
- the employer's investigation of Workplace Violence or the risk of Workplace Violence; and
- the measures that are already in place to prevent and protect against Workplace Violence.

The Company will assess the potential for Workplace Violence by taking into account the nature of the working activities; the working conditions; the design of the work activities and surrounding environment; the frequency of situations that present a risk of Workplace Violence; the severity of the adverse consequences to the Employee exposed to a risk of Workplace Violence; the observations and recommendations of the JHSC (or comparable committee or representative); and the measures that are already in place in order to prevent and protect against Workplace Violence. This assessment will be considered in the Company's general risk assessment.

When new risks are detected, the Company in consultation with the JHSC (or comparable committee or representative) will include the corrective actions in the Company's preventative planning, based on the magnitude and number of Employees exposed.

This program will be reviewed annually by the Company in consultation with the JHSC (or comparable committee or representative), or as otherwise as required.

The Company will also ensure Employees understand what to do if they experience or witness Workplace Violence. The following summarizes the primary actions:

i) Seek Out Safe Location

If there is an immediate concern for safety, any persons subjected to or witnessing Workplace Violence should, where appropriate, seek out a safe location for themselves at the Workplace.

ii) Report Incident to Police Immediately When There is an Immediate Concern for Physical Safety (using local emergency procedures)

If the Workplace Violence incident is acute or where it is deemed appropriate to do so, the Police should be summoned by management, human resources or any Employee who is witness to or is experiencing acute Workplace Violence. Management and/or human resources may also report the incident to Police.

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.

APPENDIX G
COUNTRY SUPPLEMENT
AUSTRALIA

The purpose of this appendix is to provide additional information and resources to Company employees concerning Australian law. All directors, officers and employees of Brookfield Australia must note the following differences from the Group Positive Work Environment Policy.

Workplace discrimination

Grounds of discrimination

There are a number of Federal and State laws, such as the *Age Discrimination Act 2004* (Cth), *Disability Discrimination Act 1992* (Cth), *Racial Discrimination Act 1975* (Cth), *Sex Discrimination Act 1984* (Cth), *Anti-Discrimination Act 1977* (NSW) and *Equal Opportunity Act 2010* (Vic), which presently make discrimination unlawful on a variety of grounds, including:

- sex;
- relationship or marital status;
- pregnancy or potential pregnancy;
- breastfeeding;
- age;
- race, colour, descent, national or ethnic origin;
- disability, impairment, illness or injury;
- physical features;
- political belief or activity;
- trade union membership or industrial activity;
- sexual orientation or lawful sexual activity;
- gender history, gender identity, transgender or transsexual status;
- carer status, parental status or family responsibilities;
- employment activity;
- religious belief or activity; or
- personal association with, or relation to, a person identified by reference to any of the above attributes.
- workplace right or a right under a workplace law (this includes a benefit, role or responsibility under a workplace law, instrument or order, or a right to initiate proceedings or make a complaint under a workplace law, instrument or order);

Exceptions

In some situations, the legislation may provide exceptions to discrimination or permit what would otherwise be unlawful discrimination. In these circumstances discrimination will be permissible. For example, while it is unacceptable to discriminate against a person with a disability, what would otherwise be unlawful discrimination may be justified if the person cannot perform the inherent requirements of their position. For example, the *Fair Work Act 2009* (Cth) permits the taking of adverse action because of the inherent requirements of the particular position concerned.

Adverse action

In addition to the various anti-discrimination and equal opportunity laws in Australia, the *Fair Work Act 2009* (Cth) prohibits taking adverse action against employees, such as by firing them, injuring them in their employment or changing their job to their disadvantage, on the basis of the following protected attributes:

- race;
- colour;
- sex;
- sexual orientation;
- breastfeeding;
- gender identity;
- intersex status;
- age;
- a physical or mental disability;
- marital status;
- family or carer's responsibilities;
- subjection to family and domestic violence;
- pregnancy;
- religion;
- political opinion;
- national extraction; or
- social origin.

Vilification

Vilification is a public act which incites hatred towards, serious contempt for, or severe ridicule of, a person or group on the ground of race, religion, sexual orientation, HIV/AIDS status, transgender status or disability.

Vilification breaches this policy and may also breach Federal and/or State legislation. Legal action can be taken against individuals who breach this legislation, as well as against the Company. Vilification may also amount to a criminal offence reportable to the police if physical harm is threatened towards a person or their property.

Sexual Harassment

In accordance with Australian law and under Brookfield's Code of Business Conduct and Ethics, employees must not engage in the sexual harassment of others.

In Australia, sexual harassment is unlawful under the *Sex Discrimination Act 1984* (Cth) (the **Act**). The Act defines sexual harassment as:

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

where a reasonable person would have anticipated the possibility that the person harassed would be offended, humiliated, and/or intimidated.

The Act defines the nature and circumstances in which sexual harassment is unlawful. The Act also makes it unlawful to subject a person to a workplace environment that is hostile on the ground of sex. Conduct such as general sexual banter, or innuendo and offensive jokes could all contribute to a sexually hostile workplace environment.

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Examples of sexual harassment

Examples of sexually harassing behaviour include, but are not limited to:

- unwelcome touching, staring or leering
- suggestive comments or jokes or insults based on sex;
- unwanted invitations to go out on dates, sexually explicit physical contact or requests for sex;
- intrusive questions about a person's private life or body; and
- unnecessary familiarity, such as deliberately brushing up against a person; and
- sexually explicit emails or SMS text messages.

Sex-based harassment

Harassment on the ground of sex (sex-based harassment) is also unlawful under the Act. The Act defines sex-based harassment as when a person engages in unwelcome conduct of a demeaning nature in relation to a person, by reason of:

- a) the harassed person's sex; or
- b) a characteristic that appertains generally to persons of the harassed person's sex; or
- c) a characteristic that is generally imputed to persons of the harassed person's sex

where a reasonable person would have anticipated the possibility that the person harassed would be offended, humiliated, and/or intimidated. The Act defines the circumstances to be considered in determining whether conduct was sex-based harassment.

Sex-based harassment is not necessarily sexual in nature. It may cover, for example, a demeaning comment to an employee that they performed poorly at a task because persons of their gender are less capable in that particular aspect of work.

Victimisation

It is also unlawful for a person to be victimised for, among other things, making, or proposing to make, a complaint of sexual harassment to the Human Rights Commission or making an allegation of sexual harassment. Victimisation involves subjecting, or threatening to subject, a person to a detriment, such as demotion, dismissal, loss of a benefit, being ostracised from work, or being the subject of gossip, because of their involvement in a complaint (including by providing information to any investigation into a complaint). Committing an act of victimisation also constitutes a criminal offence under the Act. Victimisation is also prohibited under the whistleblowing provisions of the *Corporations Act 2001* (Cth) and Brookfield's Whistleblowing Policy (including the Australian Addendum thereto).

Positive duty

An individual who sexually harasses is primarily responsible for the sexual harassment under the Act. However, under the Act, as an employer, Brookfield also has a positive duty to take reasonable and proportionate measures to eliminate, as far as possible, unlawful sex discrimination, sexual harassment, sex-based harassment work environments that are hostile on the ground of sex, and victimisation associated with such discrimination. This duty operates concurrently with duties under workplace health and safety laws. The Australian Human Rights Commission has various enforcement powers in respect of this positive duty, including powers to investigate compliance, issue compliance notices, enter into enforceable undertakings, and commence Court proceedings.

Bystanders

At Brookfield, we encourage bystanders to support colleagues who may have been subjected to unacceptable behaviour. A "bystander" is a person who has witnessed or subsequently learned about potentially unacceptable behaviour at Brookfield.

Bystanders are a vital part of Brookfield's strategy to prevent unacceptable behaviour. This is because sometimes people affected by this behaviour might not know the behaviour is unacceptable or may feel uncomfortable about coming forward or speaking up.

Brookfield encourages bystanders to provide support to colleagues who may have been subjected to unacceptable behaviour, including by:

- "calling" unacceptable behaviour when it's seen in the workplace;
- spotting offending behaviour and asking the colleague if they are okay;
- supporting the colleague by providing them with information about this policy and avenues for raising their concerns; or
- reporting the conduct to a manager, local HR representative, or Reporting Hotline.

To the extent possible, Brookfield will take steps to preserve a bystander's anonymity. In addition, bystanders are protected by the victimisation provisions of this policy. Bystanders who need support are encouraged to contact the HR department.

Interaction with workplace health and safety laws

Workplace discrimination, violence or harassment are risks to psychosocial health and safety.

Brookfield, its officers, its workers and others in the workplace owe a duty of care under workplace health and safety laws and must therefore treat the type of unacceptable behaviour discussed in this policy as they would treat behaviour that causes a risk to physical health and safety. All workers must take reasonable care for their own physical and psychological health and safety and take reasonable care not to adversely affect the physical and psychological health and safety of other persons (including by engaging in harassment or discrimination).

APPENDIX H

COUNTRY SUPPLEMENT JAPAN

The Company is committed to maintaining a workplace free from harassment and discrimination consistent with the Positive Work Environment Policy (the "**Policy**") and applicable law. The purpose of this appendix is to further supplement definitions of Workplace Harassment stated in the Policy, and provide additional information and resources to Company employees working in Japan.

(Definitions of Power Harassment, Sexual Harassment, and Harassment Related to Pregnancy, Childbirth, Childcare Leave and Others)

Article 1: Power harassment is defined as actions based on a superior relationship that exceed necessary and reasonable scope of work, thereby harming the work environment (the "**Power Harassment**"). Proper work instructions and guidance within the necessary and reasonable scope of work do not constitute power harassment.

1. Sexual harassment is defined as any disadvantageous treatment to an employee's working conditions due to the employee's response to sexual harassment in the workplace, or any harm to the working environment of another employee due to sexual behavior (the "**Sexual Harassment**"). This includes actions regardless of sexual orientation or gender identity of the other party, and includes not only words or actions toward the opposite sex, but also words or actions toward the same sex.
2. The "other employees" in the preceding paragraph include not only the direct victims of sexual actions but also all employees whose work environment is harmed by such actions.
3. Harassment related to pregnancy, childbirth, childcare leave and others is defined as actions by supervisors or colleagues in the workplace that harm the work environment of employees due to their use of systems or measures related to pregnancy, childbirth, and childcare (the "**Harassment related to pregnancy, childbirth, childcare leave and others**"). It also includes actions that harm working environment of female employees due to pregnancy or childbirth. Actions, objectively based on the necessity of work, such as work distribution and safety considerations, do not constitute Harassment Related to Pregnancy, Childbirth, Childcare Leave and Others.
4. The "workplace" in paragraphs 1, 2, and 4 includes not only the office where employees normally work but all places where employees perform their duties, as well as times outside of working hours that are virtually considered as an extension of work.

(Prohibited Acts)

Article 2: All employees must not engage in acts listed in the following paragraphs 2 to 5 within the workplace. Additionally, similar acts must not be committed against individuals other than employees working at this Company.

1. **Power Harassment** (acts that meet requirements under Article 1, paragraph 1):
 - 1) Physical attacks such as hitting or kicking;
 - 2) Psychological attacks such as making statements that deny a person's character;

- 3) Isolation of employees who do not conform to one's wishes by removing them from their work, placing them in a separate room for an extended period and so forth;
 - 4) Excessive demands such as ordering tasks unrelated to work in harsh environments that cause physical pain over a long period;
 - 5) Unreasonable demands, such as having a subordinate in a managerial position perform a task that can be performed by anyone in order to force them to resign; and
 - 6) Infringement of personal privacy by disclosing sensitive personal information such as sexual orientation, gender identity, or medical history to other employees without obtaining consent;
2. **Sexual Harassment** (acts that meet requirements under Article 1, paragraph 2):
- 1) Unnecessary questions or comments about sexual or physical matters;
 - 2) Viewing, distributing, or displaying obscene images;
 - 3) Spreading rumors;
 - 4) Unnecessary physical contact;
 - 5) Actions that lower motivations of other employees and hinder their ability to perform due to sexual behaviors;
 - 6) Forced dating or sexual relations;
 - 7) Taking adverse actions such as dismissal, unfair evaluations, or transfer against employees who protest or refuse sexual behavior; and
 - 8) Other sexual behaviors that cause discomfort to the other party and other employees;
3. **Harassment Related to Pregnancy, Childbirth, Childcare Leave and Others** (acts that meet requirements under Article 1, paragraph 4):
- 1) Suggesting dismissal or other unfavorable treatment regarding the use of systems or measures related to pregnancy, childbirth, childcare, or nursing care by subordinates;
 - 2) Obstructing the use of systems or measures related to pregnancy, childbirth, childcare, or nursing care by subordinates or colleagues;
 - 3) Harassment due to the use of systems or measures related to pregnancy, childbirth, childcare, or nursing care by subordinates or colleagues;
 - 4) Suggesting dismissal or other unfavorable treatment due to pregnancy or childbirth by subordinates; and
 - 5) Any other harassment in relation to pregnancy or childbirth by subordinates or colleagues;
4. Acts by supervisors who, while recognizing that their subordinates are being harassed in the workplace, condone such behavior.

(Disciplinary Actions)

Article 3: If employees engage in harassment or such other inappropriate behaviors set out above, the Company may take disciplinary actions based on the Work Rules.

(Counseling and Response to Complaints)

Article 4: The Company shall set up a counseling desk in the HR department and the HR director or other HR personnels shall be the person in charge.

1. Not limited to victims of bullying at work, all employees may come to the counseling desk regarding all kinds of harassment listed in Article 2.
2. HR Director shall collect details of cases reported from complainant and report it to the head of HR APAC. Based on the report, the head of HR shall consider the privacy of the complainant and listen to facts from victims, their managers, other employees, etc. as necessary.
3. An employee who is requested to have a hearing, cannot refuse it without justifiable grounds.
4. The HR Director shall report facts, etc. to the board of directors, and the board of directors shall take necessary measures or disciplinary action(s) to improve the working environment for employees.
5. In responding to consultations and complaints, the privacy of persons concerned shall be protected, and the persons shall not be treated unfavorably because they have consulted or cooperated in confirming the facts.

(Obligation of Prevention of Recurrence)

Article 5: When a case of the Workplace Harassment is confirmed, the head of HR shall take appropriate measures to prevent recurrence, including re-emphasizing public awareness, conducting training, and analyzing the causes of the incident.

Employees may visit <https://www.nohara.metro.tokyo.lg.jp/> to access online all type of harassment prevention resource.

APPENDIX I

COUNTRY SUPPLEMENT

KOREA

The purpose of this appendix is to further supplement definitions of Workplace Harassment stated in the Group Positive Work Environment Policy, and provide additional information to directors, officers and employees of Brookfield Korea.

Workplace Harassment for Employees

Under the Labor Standards Act (“LSA”), workplace harassment is defined as: (i) an act by an employer or employee against another employee; (ii) taking advantage of a superior position or relationship in the workplace; (iii) that exceeds the appropriate scope of work; and (iv) causes physical or mental suffering to another employee or creates a hostile work environment.

A “superior position” primarily refers to a hierarchical supervisory relationship, while a “superior relationship” can include advantages based on age, educational background, length of service, membership in employee organizations, and other factors that may create a practical advantage.

For a conduct to exceed an appropriate scope of work, (i) there must be no recognizable work-related necessity based on social norms, or (ii) the method employed must be unacceptable by social norms even if work-related necessity exists. The determination considers the relationship between parties, location and context of the conduct, victim’s explicit or implicit reactions, nature and degree of the actions, and whether the behavior was continuous.

Sexual Harassment for Employees

Under the Equal Employment Opportunities and Work-Life Balance Assistance Act (“Equal Employment Act”), sexual harassment is defined as: (i) an act by an employer, superior, or employee against another employee; (ii) utilizing workplace position or in relation to work duties; (iii) through sexual language or behavior; that (iv) causes sexual humiliation or aversion, or disadvantages employment conditions for rejecting such conduct.

Sexual language or behavior encompasses physical, verbal, or visual conduct related to physical relations between men and women or physical characteristics of men or women that would objectively cause an average person in the same position to feel sexual humiliation or aversion. While sexual motivation or intent is not required, determination considers the relationship between parties, location and context, victim’s explicit or implicit reactions, nature and severity of conduct, and whether it occurred once or repeatedly.

Obligations of Brookfield Korea

Under the LSA and the Equal Employment Act, Brookfield Korea is obligated to:

- Upon receiving a report or becoming aware of workplace/sexual harassment, investigate the incident without delay;
- During the investigation of workplace/sexual harassment, take interim protective measures for victims, such as alteration of place of work, reassignment, and paid leave, if necessary; provided, however, that the measures are not against the will of the victim;
- Upon confirmation of workplace/sexual harassment, take appropriate measures for victims, such as alteration of place of work, reassignment and paid leave, if requested by the victim;
- Upon confirmation of workplace/sexual harassment, implement necessary measures against the perpetrator without delay, such as disciplinary actions and alteration of place of work, and listen to the victim’s opinion before taking any disciplinary action against the perpetrator;

- Not take any unfavorable measures, such as imposing unfair personnel measures or discriminating against the employee who reported the occurrence of workplace/sexual harassment and the victim for raising an issue of workplace/sexual harassment;
- Any person who investigates workplace/sexual harassment, receives a report on the investigation result, or is involved in the investigation process must not divulge information that they learned in the course of the investigation to any other person against the will of the victim; provided, however, that this will not apply where a person reports such information to the employer or provides necessary information at the request of the relevant agency; and
- Conduct workplace/sexual harassment prevention training annually.

Considerations regarding External Parties (e.g., Vendors, Clients, or Customers)

When an alleged perpetrator belongs to another legal entity, whether in Korea or another jurisdiction, the Occupational Safety and Health Act (“OSHA”) provides protections for employees in such scenarios. In particular, the OSHA provides that: Brookfield Korea, as an employer, is obligated to take necessary measures, such as temporary suspension or change of job duties, if an employee suffers from or is highly likely to suffer from health issues due to harassment by third parties; and Brookfield Korea cannot take disadvantageous measures against an employee who asks an employer to take necessary protective measures.

Please also note that under the Equal Employment Act, in the course of performing work, if a person closely connected to Brookfield Korea’s business, such as a customer, makes sexualized remarks or engages in other sexual conduct that causes an employee to feel sexually humiliated or disgusted, and the employee requests relief from that distress, Brookfield Korea is obligated to take appropriate measures, such as changing the employee’s work location, reassigning them, or granting paid leave.

APPENDIX J
COUNTRY SUPPLEMENT
SINGAPORE

The following definition of Workplace Discrimination will apply for Singapore.

Workplace Discrimination means the differential treatment of an individual or group, such as the denial of an opportunity, based on any of the following protected characteristics, including those protected by applicable law:

- race
- color
- sex, gender (including pregnancy, pregnancy-related conditions, breastfeeding and family/caregiver responsibilities) or gender identity
- marital status
- national origin or nationality
- religion
- political opinion
- age
- physical or mental disability
- sexual orientation (including intersex status)
- experiencing family or domestic violence
- caregiver responsibilities for a family member
- language ability
- mental health condition

APPENDIX K

CONTACT INFORMATION FOR POLICY

Kathy Sarpash +1.416.369.2621
kathy.sarpash@brookfield.com

Reporting Hotline Toll Free:

Australia - 1800-957-963	Japan – 0800-123-9234
Barbados - 1-833-857-0140	Luxembourg – 800-27-819
Bermuda - 1833-388-0833	Mexico – 01800-436-0065
Brazil - 0800-550-0049	New Zealand – 0800-450-194
Canada – 1800-665-0831	Peru – 0800-74879
Cayman Islands – 800 337 1159	Portugal – 800-815-087
Chile – 800-914-483	Qatar – 800-0249
China – 800 337 1159	Saudi Arabia – 800-850-1669
Colombia – 01800-518-9736	Singapore – 800-492-2253
France - 0800-91-2964	South Korea – 080-880-0303
Germany – 0800-182-1227	Spain – 900-751-347
Hong Kong – 800-967-085	Switzerland – 0800-225-163
India - 000-800-0502-237	United Arab Emirates - 800 0120127
Ireland – 1800-849-310	United Kingdom – 0800-652-6598
	United States – 1770-613-6339

Online:

Global (excluding China): www.brookfield.ethicspoint.com
China: BAM <https://brookfield.whispli.com.cn/pages/BAM>
Real Estate <https://brookfield.whispli.com.cn/pages/realestate>
Renewables <https://brookfield.whispli.com.cn/pages/renewables>