

1. Introduction

Brookfield Asset Management Inc. and its wholly owned subsidiaries¹ (collectively, “we,” “us,” “our,” “Brookfield” or the “Company”) are committed to conducting business activities with honesty and integrity and in compliance with applicable legal and regulatory requirements. We expect anyone that provides goods or services to Brookfield (“Vendors”) adhere, at a minimum, to the same commitments to ethics and compliance as this Vendor Code of Conduct

parties that could be considered to improperly influence any act or decision of such official or person for the purpose of promoting the business interests of Brookfield in any respect, or otherwise in violation of applicable law. This includes a prohibition on “facilitation”¹ payments of any kind.

- d. Refrain from entering into business relationships or transactions with Brookfield personnel in an individual capacity or in any way that could create the appearance of a conflict of interest or impropriety.
- e. Disclose to Brookfield and avoid or appropriately manage any actual or potential conflicts of interest arising due to either personal or business relationships.
- f. Not knowingly facilitate a person committing to the fraudulent evasion of tax.
- g. Promptly apprise Brookfield in the event either they or any related company (including parent companies) have been: (i) named or listed as the target of any economic, trade, or transactional sanctions imposed by any governmental agency; or (ii) otherwise banned or blocked pursuant to any laws that are enforced or administered by any governmental agency.
- h. Comply with all applicable trade restrictions and sanctions laws, and not knowingly employ or do business with anyone suspected of being connected with criminal or terrorist activities or

who is the subject of applicable trade sanctions.

5. Responsible Labor Practices

Brookfield respects and supports human rights and requires that workers are treated with dignity, respect and in accordance with applicable laws. Brookfield expects our Vendors to respect human rights and maintain processes to identify and prevent adverse human rights impacts that could arise from their or their suppliers’ operations. Brookfield expects Vendors to:

- a. Provide a safe and secure workplace for employees, contractors, and representatives that complies with all applicable health and safety laws, regulations, and practices.
- b. Provide fair compensation, fair benefits, overtime pay, time off, breaks, leave, and holidays in the context of local market factors that, at a minimum, comply with applicable laws and regulations, including those pertaining to withholding taxes, minimum wage, labor relations, insurance, and health and occupational safety. Wage deductions will not be used as a disciplinary measure.
- c. Provide training as necessary to ensure personnel have the required skills and certifications to perform the assigned work.
- d. Adhere to age-related standards set by the International Labor Organization and not use child labor or any form of forced² or involuntary labor.
- e. Provide a workplace free from discrimination and harassment,

¹Facilitation payments are small payments made to secure or speed up routine actions by public officials or other third parties that they are otherwise obligated to perform. This could include issuing permits, approving immigration documents, or releasing goods held in customs. Facilitation payments do not include fees prescribed by government agencies for expedited services.

²Forced labor includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of their exploitation.

whether on the basis of gender, age, disability, ethnicity or cultural affiliation, sexual orientation, belief, educational background or any other basis prohibited by applicable law.

- f. Respect the right for freedom of association unless restricted under local law, without fear of discrimination or reprisal.

6. Workplace Health & Safety

Brookfield expects its Vendors to provide a workplace that seeks to prevent injury and ill-health and at a minimum:

- a. Provide and maintain a clean, safe, and healthy working environment that complies with applicable laws, directives, and regulations, and minimizes occupational hazards. Working conditions should at a minimum include reasonable access to sanitary facilities, fire exits, potable water, and adequate lighting and ventilation, and any Vendor-provided residential spaces must be sanitary and safe.
- b. Implement procedures designed to prevent injury to workers, including providing adequate work training and personal protective equipment as appropriate and safeguards against infectious disease.
- c.

request by Brookfield, Vendors will disclose in reasonable detail and discuss the elements of their business continuity plans.

10. Insider Trading

Information provided to Vendors by Brookfield may include material non-public information (“MNPI” V2.1 (f (e)15.1 2he)9 (on)h.1 (7 (onM.1 (78J0 Tc 0.001 Tw3)-0.7 (oM.1 (7av)-0.)-2.8J0 TcIJ0 Tcab)-0.7 (l

or harassment pertaining to (i) accounting, auditing or other financial reporting irregularities; (ii) unethical business conduct (including safety, environment, conflicts of interest, theft and fraud); or (iii) violations of applicable law. The Brookfield Ethics Hotline may be accessed by telephone (toll free) at the numbers listed below or by submitting an anonymous report online at www.brookfield.ethicspoint.com. Brookfield will investigate all reports in compliance with applicable laws or as it otherwise deems necessary.

North America –800-665-0831

Australia –1800-152-863

Barbados – 1833-388-0834

Bermuda – 1833-388-0833

Brazil – 0800-891-3867

Cayman Islands – 833-425-1502

Chile – 1230-020-0517

China – 400-880-1042

Colombia – 01800-011-0149

France – 0800-91-2964

Germany – 0800-000-6649

Ireland – 1800-946-551

Japan – 012-099-3307

Luxembourg – 800-85-269

Mexico – 01800-436-0065

New Zealand – 0800-443-938

Portugal – 0800-78-4717

Qatar – 800-0249

Singapore – 1800-622-7248

South Korea – 0809-080-895 LO 06wW nBT1

Spain – 900-810-305

Switzerland