

WHISTLEBLOWING POLICY

July 2023

Scope

This Whistleblowing Policy (this “Policy”) applies to all directors, officers, employees and temporary workers¹ (collectively, “you” or “Employees”) of (i) Brookfield Asset Management Ltd. and its wholly-owned subsidiaries (the “Manager”); and (ii) Brookfield Asset Management ULC and its wholly-owned subsidiaries (together with the Manager, “we,” “us,” “our,” or “Brookfield”), unless such subsidiary has adopted its own Whistleblowing Policy (or similar policy) that is consistent with the provisions of this Policy.²

All Employees are required to comply with applicable whistleblowing laws and with the whistleblowing provisions set out in Brookfield’s Code of Business Conduct and Ethics (the “Code”). This Policy supplements the provisions set forth in the Code and is intended to raise awareness of our approach to whistleblowing among our Employees.

Purpose

Brookfield is committed to providing a mechanism for Employees to report suspected wrongdoing or dangers in relation to Brookfield’s activities and have those concerns addressed in a timely and confidential manner. In scenarios where one Employee suspects another Employee of wrongdoing, or has other concerns covered by the Code, that Employee should refer to this Policy and to the Code on the appropriate course of action.

Responsibilities

All Employees are responsible for ensuring this Policy and the procedures set forth herein are used correctly, in line with the expectations of Brookfield and in compliance with applicable legislation.

Whistleblowing Procedure

Brookfield is committed to conducting its business with honesty and integrity and all staff are expected to maintain high standards and act in accordance with the Code.

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to Brookfield’s activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment, any breach (acts or omissions) of legal or professional obligations, complaints regarding accounting, internal accounting controls, or auditing matters, and any other matter detailed in the Code. Any suspected wrongdoing should be reported as soon as possible.

How to raise a whistleblowing concern

If an Employee has a whistleblowing concern, Brookfield hopes that in most cases they will feel able to raise those concerns with their supervisor. However, where they prefer not to raise it with their supervisor for any reason, they should contact the Human Resources (“HR”) Department or Brookfield’s

¹ For purposes of this Policy, “temporary workers” include non-full-time employees, volunteers, paid and unpaid trainees and consultants and contractors etc. that work on our premises.

² Where a subsidiary has adopted its own Whistleblowing Policy (or similar policy) that is consistent with the provisions of this Policy, the subsidiary’s directors, officers, employees and temporary workers follow that policy, and, in case of a conflict, the terms of that policy control.

internal legal counsel.

In the event you do not want to report violations to your supervisor, HR, or internal legal counsel, you can always make a report through Brookfield's reporting hotline (the "Reporting Hotline"). The Reporting Hotline is managed by an independent third party. The Reporting Hotline allows anyone to call or submit a report online anonymously (if they so choose) to report suspected unethical, illegal or unsafe behavior in English and other languages. The Reporting Hotline is available toll-free, 24 hours a day, 7 days a week. Refer to "Schedule A" to this Policy for the Reporting Hotline phone numbers and websites by jurisdiction.

Once an Employee has raised a concern formally, Brookfield will acknowledge receipt. When feasible, Brookfield will arrange a meeting with the Employee as soon as practicable. Brookfield will carry out a review and, where appropriate, consider whether the issue should be investigated more formally. Further investigation could be undertaken in a number of ways depending on the nature of the concern and the geographies involved and could include appointing an independent person to lead the inquiry, seeking further evidence and the accounts of witnesses. Where possible and practical to do so, Brookfield will inform the Employee of any outcome and steps undertaken.

Confidentiality

The confidentiality of reported violations and the identity of the employees who raise a whistleblowing concern will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review and subject to applicable law. Employees may wish to identify themselves to facilitate our investigation of any report; however, you can make an anonymous report by calling the Reporting Hotline.

Reporting and Recording Process

The party receiving the initial report must record its receipt, document the concerns named in the report and how the situation was dealt with and file a report with internal audit, which will be retained for the record. The Chief Internal Auditor will report all illegal and unethical conduct in violation of the Code to the appropriate Brookfield Board of Directors, or a committee thereof as appropriate, and externally in accordance with applicable laws.

External Disclosures

The aim of this Policy and the Code is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, Employees should not find it necessary to alert anyone externally.

The law recognizes that in some circumstances it may be appropriate for Employees to report their concerns to an external body such as a regulator. Brookfield is regulated by various governmental and regulatory authorities globally which are listed on the intranet.³ It will rarely, if ever, be appropriate to alert the media. Brookfield strongly encourages Employees to seek advice before reporting a concern to anyone external. Employees can always contact the Reporting Hotline.

Zero Tolerance for Retaliation or Malicious Acts

Employees who raise a whistleblowing concern or participate in good faith in any investigation must not suffer any form of retaliation or victimization as a result. Brookfield will treat very seriously any acts of victimization or retaliatory action taken against Employees who, in good faith, raise a whistleblowing

³ Details of such regulators are set out in relevant locally applicable Brookfield policies.

concern and/or participate in a whistleblowing investigation. Victimization or retaliation in these circumstances may be unlawful and any Employee who is found to have violated this provision will be subjected to disciplinary action under Brookfield's disciplinary procedure, including but not limited to dismissal.

Employees who feel they are being or have been victimized or retaliated against should report this immediately to their supervisor or to the HR team. However, if a whistleblowing concern is found to have been deliberately falsified or made maliciously or in bad faith, the Employee concerned may be subjected to disciplinary action under Brookfield's disciplinary procedure, including but not limited to dismissal.

Management is responsible for reviewing this Policy on an annual basis to ensure consistency and compliance with applicable law, the Code, and other applicable corporate policies.

Schedule A

REPORTING HOTLINE

Australia - 1800-152-863	Japan – 012-099-3307
Barbados -1833-388-0834	Luxembourg – 800 85 269
Bermuda -1833-388-0833	Mexico –01800-436-0065
Brazil - 0800-891-3867	New Zealand – 0800-443-938
Canada – 1800-665-0831	Portugal – 0800-78-4717
Cayman Islands – 833-425-1502	Qatar – 800-0249
Chile – 1230-020-0517	Singapore – 1800-622-7248
China – 86 21 8036 5429	South Korea – 080-880-0303
Colombia – 01800-011-0149	Spain – 900-810-305
France - 0800-91-2964	Switzerland – 0800-225-163
Germany - 0800-000-6649	United Kingdom - 0808-234-2210
Hong Kong – 800-960-631	United States – 1770-613-6339
Ireland – 1800-946-551	
India - 000-800-0502-237	

Two-Stage Dialing:

Peru –0-800-50-000 or 0-800-50-288, then 800-795-2716

United Arab Emirates - 8000-021, 8000-555-66, or 8000-061, then 800-795-2716

Online (*Rest of the world*): – www.brookfield.ethicspoint.com

Online (*China*):

- Brookfield Asset Management Ltd.: <https://brookfield.whispli.com.cn/pages/BAM>