

## **Brookfield Asset Management**

### **Anti-Money Laundering Policy Summary**

Brookfield is committed to preventing its business from being used for money laundering, terrorist financing and related financial crimes activities (collectively, “money laundering”), and to complying fully with applicable anti-money laundering laws, regulations and related requirements, including economic and trade sanctions administered and enforced by governments and other bodies, such as the sanctions programs and designated sanctions lists administered by the U.S. Department of the Treasury’s Office of Foreign Assets Control.

To this end, Brookfield has adopted an anti-money laundering program (“AML Program”) that must be strictly adhered to. The AML Program is designed to comply with applicable anti-money laundering laws and regulations.

Brookfield’s AML Program includes the following components:

1. Designation of AML Program Compliance Officers
2. Protocols to ensure compliance with applicable laws and regulations, including:
  - a. Customer identification and verification processes
  - b. Customer monitoring processes, including screenings against sanctions lists
  - c. Suspicious activity monitoring and reporting processes
  - d. Processes for receipt and response to information requests
  - e. Recordkeeping requirements
3. Risk assessment
4. Employee training and awareness program
5. Annual independent testing and evaluation of the AML Program