



## **Sustainability Policy**

**Brookfield Private Equity Group  
Brookfield Business Partners  
Brookfield Business Corporation**

**August 2024**

## I. Introduction

At Brookfield Private Equity Group (“BPEG”), Brookfield Business Partners LP (“BBU”) and Brookfield Business Corporation (together with BBU, “Brookfield Business Partners”), we invest in a wide breadth of industries and often in businesses that provide essential goods and services critical to the economy. With this depth and breadth of experience comes the understanding that maintaining a social license to operate is central to preserving capital, mitigating risk, and creating long-term value. Fundamentally, we believe strong sustainability practices drive enhanced economic value to our business and ensure the sustainability of our operations well into the future.

Most importantly, operating a business with strong sustainability principles is simply the right thing to do. We have a long history of embedding sustainability considerations into both our investment decisions and our operations. We believe this philosophy creates an inherent alignment of interest between us, our investors, and other stakeholders.

This Sustainability Policy defines the purpose, scope, principles, and responsibilities that underpin our sustainability strategy.

## II. Purpose

This Policy is intended to outline the sustainability principles that BPEG and Brookfield Business Partners apply to the management of their operations and how sustainability considerations are integrated into the investment lifecycle to mitigate downside risk and capitalize on value opportunities.

## III. Scope and Application

This Policy applies to both BPEG and Brookfield Business Partners, their directors, officers, employees, and temporary workers<sup>1</sup>. Brookfield Asset Management Inc. (“Brookfield”) employs a common set of sustainability principles across its business, while recognizing that the geographic and sector diversity within our portfolio requires a tailored approach to implementation.

We define material sustainability considerations as those that have the potential to have a direct, substantial impact on an organization’s ability to create, preserve or mitigate erosion of economic value, environmental or social value for itself and its stakeholders<sup>2</sup>. The elements on which we focus may differ across certain industries, activities, geographic locations, and types of businesses (i.e., control, joint control, minority, public equity, or debt).

Where we make a control investment, we seek to work with our portfolio company to integrate and monitor material sustainability risk and opportunities. Where BPEG or Brookfield Business Partners is an investor in an entity that it does not control, we make commercially reasonable efforts to ensure that the operations of that entity are managed in a manner consistent with our sustainability principles. We also seek to share best practices across our portfolio companies where possible.

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<sup>1</sup> For the purposes of this Policy, “temporary workers” include non-full-time employees and consultants and contractors.

<sup>2</sup> The word “material” should not be equated to or taken as a representation concerning the “materiality” of any particular sustainability factor under U.S. federal securities laws or any similar legal or regulatory regime globally.

This Policy is applicable to all BPEG and Brookfield Business Partners investing and operating activities and will be updated periodically, as appropriate, and has been reviewed and approved by the Board of Directors of the general partner of Brookfield Business Partners LP and the Board of Directors of Brookfield Business Corporation.

#### **IV. Principles**

We have established organization-wide principles that govern our overall approach to sustainability, and the implementation of those principles is tailored to each investment based, among other things, on the business activity, location and industry of operation, and investment type.

Our Brookfield-wide sustainability principles are:

**1) Mitigate the impact of our operations on the environment**

- a) Strive to minimize the environmental impact of our operations and improve our efficient use of resources over time
- b) Support the goal of net-zero greenhouse gas (GHG) emissions by 2050 or sooner

**2) Ensure the well-being and safety of employees**

- a) Foster a positive work environment that respects human rights, values diversity and does not tolerate workplace discrimination, violence or harassment
- b) Operate with leading health and safety practices to support the goal of zero serious safety incidents

**3) Uphold strong governance practices**

- a) Operate to the highest ethical standards by conducting business activities in accordance with our Code of Business Conduct and Ethics
- b) Maintain strong stakeholder relationships through transparency and active engagement

**4) Be good corporate citizens**

- a) Ensure the interests, safety and well-being of the communities in which we operate are integrated into our business decisions
- b) Support philanthropy and volunteerism by our employees

#### **V. Roles and Responsibilities**

The Governance and Nominating Committee of Brookfield Business Partners formally oversees our sustainability strategy and is responsible for reviewing and approving material sustainability initiatives, disclosures, and reports and making recommendations to the Brookfield Business Partners Board on sustainability-related matters.

BPEG and Brookfield Business Partners have established a Sustainability Steering Committee, comprised of senior level executives across functional groups. The Sustainability Steering Committee is responsible for managing organization-wide sustainability initiatives, staying focused on the latest sustainability trends, participating in sustainability-related industry meetings, and coordinating with teams across Brookfield to share best practices.

Our senior leadership team supports the investment and business operations teams in executing on initiatives aimed at improving operational and environmental performance across the portfolio.

The management teams of our portfolio companies have primary responsibility for the management of sustainability considerations within their operations. All controlled portfolio companies are required to maintain and follow a systematic program to manage activities in accordance with this Policy.

## **VI. Sustainability and the Investment Cycle**

BPEG and Brookfield Business Partners consider material sustainability considerations and evaluate risks and value creation opportunities throughout the investment lifecycle, starting with due diligence of a potential investment through to the exit process. We undertake the following steps for each potential investment, in alignment with the six Principles for Responsible Investment (PRI):

### **1) Due Diligence**

During the diligence phase we utilize our operating expertise and Brookfield's Sustainability Due Diligence Protocol to identify material sustainability risks and opportunities relevant to an investment. In completing these assessments, we leverage our investment and operating expertise and utilize industry-specific principles that incorporate Sustainability Accounting Standards Board (SASB) guidance. Where warranted, we perform deeper due diligence, working with third-party technical consultants. Key factors typically considered during a review of a potential acquisition include, but are not limited to, bribery and corruption risks, health and safety risks, human rights and modern slavery risks, and environmental risks and opportunities.

### **2) Investment Decision**

Detailed memorandums provided to the Brookfield Investment Committee outline the merits of the transaction and include considerations on potential sustainability risks, mitigation strategies and opportunities. All investments are approved by the investment committee and the committee considers any material sustainability considerations in their evaluation.

### **3) Onboarding**

Portfolio companies utilize our program implementation framework to develop and operationalize a sustainability strategy tailored to their business. The framework guides the development of core program elements, including defining an appropriate governance structure, identifying relevant stakeholders, conducting a materiality assessment, and establishing associated workplans to manage risks and opportunities.

### **4) Ongoing Monitoring**

It is the responsibility of the management teams within each portfolio company to manage sustainability risks and opportunities through the investment's lifecycle, supported by the applicable investment team. The combination of having local accountability and expertise in tandem with our investment and operating capabilities is important when managing a wide range of asset types across jurisdictions. We take an active asset management approach, collaborating on sustainability initiatives, where appropriate, to drive best practices and assist with any remediation. To manage and execute sustainability-related risks and opportunities, we seek to support the implementation of best practices and development of internal capabilities at our portfolio companies. We aim to achieve this in several ways by encouraging

training, technical expertise on certain sustainability-related matters, connections to experts on sustainability issues in relevant sectors, sharing of institutional knowledge of best practices, and leveraging other firm resources including cross-portfolio collaboration.

Sustainability strategy and program implementation is reviewed on an annual basis with our controlled portfolio companies. Sustainability considerations are also reviewed on an ongoing basis and annual reporting of key performance indicators (“KPIs”) to both the Brookfield Business Partners Board of Directors and Brookfield senior management are required. These KPIs incorporate material sustainability factors, such as health and safety, environmental management, greenhouse gas emissions, and compliance with regulatory requirements.

For investments where Brookfield has a non-controlling interest, where we are a debt holder, or where we do not have the ability to exercise influence through our contractual rights, we will monitor the performance of our investments, and where appropriate, utilize our engagement practices to encourage sustainability outcomes that are aligned with our sustainability approach. Where applicable, certain strategies may have Strategic Implementation Guidelines articulating Brookfield’s stewardship and engagement process.

#### **5) Exit**

When preparing an asset for divestiture, we outline potential value creation deriving from several different factors, including relevant sustainability considerations. Where applicable, we also prepare both qualitative and quantitative data that summarize the sustainability performance of the investment and provide a holistic understanding of how we have managed the investment during the holding period.

#### **6) Engagement**

Engagement is an important element of our sustainability strategy, and we have defined our stewardship approach in alignment with the PRI. We are one of the largest owners and operators of real assets globally. In managing our assets, we utilize our significant influence and investing and operating capabilities to collaborate with our portfolio companies to encourage sound sustainability practices that are essential for resilient businesses, while creating long-term value for our investors and stakeholders. Through our ongoing engagement with portfolio companies, we may partner with or support our portfolio companies to facilitate discussions with external stakeholders with the intent of positively influencing industry standards or practices that are aligned with our sustainability principles.

### **VII. Related Brookfield Policies**

This Sustainability Policy is supplemented by several other governance documents that apply to our business and how we are operate and can be found on the Brookfield website here: <https://www.brookfield.com/responsibility>.

### **VIII. Key Contacts**

If you have any questions regarding this sustainability Policy, please contact:

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