

ANTI-BRIBERY AND CORRUPTION POLICY 2022

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ANTI-BRIBERY AND CORRUPTION POLICY

I. INTRODUCTION

This Anti-Bribery and Corruption Policy (“the Policy”) applies to all directors, officers employees and temporary workers¹ (collectively, “you”) Peak Infrastructure Management Services Private Limited (PEAK) and of all its Special Purpose Vehicle (SPV) or group companies (“Controlled Affiliates” and collectively with PEAK, “we,” “us”, “our”, “PEAK” or the “company”)

This Policy should be read in conjunction with Code of Business Conduct and Ethics (“the Code”), which serves as a guide for how you should conduct yourself as a member of the Brookfield team.

II. ZERO TOLERANCE APPROACH TO BRIBERY

Do not give or receive bribes, including facilitation payments.

We value built our reputation for conducting business with honesty and integrity. It is vital for us to maintain this reputation as it generates confidence in our business by our customers, clients, investors, investees and other persons – which ultimately means it is good for business.

We do not pay bribes in furtherance of our business and do not expect you do so on our behalf. We have a zero tolerance approach towards bribery. This commitment comes from the highest levels of management and you must meet this standard.

A bribe is anything of value that is offered, promised, given or received to improperly influence a decision or to gain an improper or unfair advantage in promoting, enhancing, obtaining or retaining business. Bribery may not always be in the form of cash payments and may take many other forms, including:

- Gifts, travel, entertainment, and hospitality.
- Non-arm’s length loans, forgiveness of debt or other transactions;
- Phony jobs or “consulting” relationships;
- Employment opportunities, directorship and internship or secondments ;
- Procurement and service contracts ;
- Political contributions;
- Excessive discounts or rebates; or
- Charitable contributions;

¹ For purposes of the Policy, “temporary workers” include non-full time employees and consultants and contractors etc. that work on our premises. The business group retaining a temporary worker is responsible for ensuring that the temporary worker certifies their commitment to comply with the policy

Facilitation payments are also a form of bribe and are, therefore, not permitted. Facilitation payments are small payments made to secure or speed up routine actions or otherwise induce public officials or other third parties to perform routine functions they are otherwise obligated to perform, such as issuing permits, approving immigration documents or releasing goods held in customs. This does not include official, legally required statutory or administrative fees formally imposed and codified by government agencies for expedited service.

Refer to the company's Anti-Bribery and Corruption Program for further details.

III. DEALING WITH PUBLIC OFFICIALS

Interactions with public officials require enhanced scrutiny and sensitivity.

A "public official" is any person who is employed by or is acting in an official capacity for a government, a department, agency or instrumentality of a government, or a public international organization. This includes elected or appointed persons who hold legislative, administrative or judicial positions such as politicians, bureaucrats, civil servants and judges. It also includes candidates for political office, political party officials and persons who perform public functions such as professionals working for public health agencies, water authorities, planning officials and agents of public international organizations such as the UN or World Bank. A "public official" may also include employees of government-owned or controlled businesses, including sovereign wealth funds and state owned utility companies. For example, if a government has an interest in a bank and exercises control over the activities of that bank, then the banking officials are likely to be considered "public officials". Third-parties acting at the direction of these individuals and entities should also be considered public officials.

There is increased sensitivity and scrutiny of dealings with public officials because this has traditionally been an area where bribery activity is more likely to occur. Be cognizant of these risks in your dealing interactions with public officials and consider how your actions may be viewed. For example, payments, gift or employment to close relatives of public officials may be treated by enforcement authorities as direct payments to the public officials and, therefore, may constitute violations of law. Similarly, hiring public officials or applicants related to, or referred by, public officials should be subject to enhanced review to ensure that the related risks are appropriately mitigated.

Refer to the company's Anti-Bribery and Corruption Program for further details.

IV. THIRD-PARTIES

Third-Parties are not permitted to pay bribes on our behalf.

The company may be scrutinised and/or prosecuted for failing to prevent bribery by a person associated with it. This includes any person or entity that performs services for or on

behalf of the company. Employees should avoid doing business with partners, agents and contractors who do not have a zero tolerance approach to bribery.

This means due diligence should be undertaken on contractors, partners, agents and other third parties to establish their anti-bribery credentials, where warranted by the assessed level of risk. This could include informing these persons (and associated companies) of the company's anti-bribery policy, meeting with them to better assess their business practices, and making commercially reasonable inquiries into their reputation and past conduct. In Consultation with internal legal counsel, include anti-bribery language in contractor, partner or agency agreements, when appropriate.

Refer to the company's Anti-Bribery and Corruption Program for further details.

V. GIFTS, MEALS AND ENTERTAINMENT

The giving or receiving of gifts and entertainment should be proportionate and reasonable for the circumstances, for legitimate purposes only, and not with a view to improperly inducing a third-party to misuse their position or as quid pro quo for official action or with linkage to an official decision.

Gifts (e.g. merchandise, event tickets) given to or received from persons who have a business relationship with the company are generally acceptable, if the gift is modest in value, infrequent, appropriate to the business relationship, and does not create an appearance of impropriety. No cash payments should be given or received.

Meals and other entertainment (e.g. sporting events or the theatre, concerts, rounds of golf) given to or received from persons who have a business relationship with the company or generally acceptable but again only if the entertainment is reasonable in value, appropriate to the business relationship, infrequent, does not create an appearance of impropriety, is otherwise in accordance with applicable laws and regulations, and if a representative from the sponsoring organization (the party paying for the entertainment) is present at the event. For the avoidance of doubt, if a representative from the sponsoring organization is NOT present at the event, the meal or entertainment would be considered a gift. Also, be aware that many jurisdiction that have laws restricting entertainment given to public officials or their close relatives that must be followed.

Gifts, meals and entertainment that are repetitive, no matter how small, may be perceived to be an attempt to create an obligation to the giver and should not be provided. Gift or entertainment given close in time to when a decision impacting Peak or Brookfield business is being (including by a private business partner) may be perceived as a bribe in return for a favourable decision and should also not be provided. Employees should not pay for gifts, meals and entertainment personally to avoid having to report or seek approval for it.

Travel (e.g. for due diligence, site visit, or Investor Day) and other similar items given or received are considered gifts for the purposes of this policy. When these types of items are given, payment should be made directly to the provider (as opposed to providing a reimbursement to the individual), whenever possible. Under no circumstances should cash or

per diem reimbursements be provided.

To help ensure that our practices are reasonable, appropriate and otherwise in accordance with applicable regulatory requirements, certain gifts, meals and entertainment must be logged and/ or pre-approved.

If you are in doubt as to whether gifts or entertainment proposed to be given or received are proportionate and reasonable for the circumstances, please consult internal legal counsel.

Anti-corruption laws in India are, The Prevention of Corruption Act which seeks to establish a substantive offence for bribe giving which is to includes not just constructively paying a bribe but the mere offer or promise to bribe a public servant as well. The punishment is minimum imprisonment to 3 years extendable up to 7 years along with a fine. It further establishes a substantive offence for bribery by commercial organisation, which also provides that when a commercial organisation is found guilty of the offence of bribery, all such persons who at the time at which the offence was committed were responsible or in charge of conducting the business of the organisation will also be guilty of the offence – and liable to a minimum imprisonment of three years – extendable to seven years, as well as a fine. Similarly, where the offence has been committed due to the consent or connivance or neglect of any director, manager, secretary or officer of the company, such person will also be held guilty of the offence. Also the same person will be punished under Indian Penal Code, maximum up to two years' imprisonment or fine or both.

Brookfield Inc. is governed by Foreign Corrupt Practice Act in US, and the same act is also applicable to all the subsidiary companies of Brookfield in any country. Any officer, manager, director engaging in any corrupt practice (either receiving or giving bribe) anywhere in any country he may be prosecuted or enforced under US Legislation.

For detail applicability of law, kindly refer to ABC program.

VI. POLITICAL DONATIONS AND LOBBYING

Do not offer or make contributions to political parties, officials and or candidates that might influence, or be perceived as influencing, a business decision.

To ensure that we do not breach the law regarding political donations in any country, all political donations, no matter how small or insignificant, made on behalf of the company (directly or indirectly) or otherwise relating to its business, must be approved in advance by the person(s) designated to approve such donations. Political donations should not be made on behalf of the company in countries in which we do not have a presence.

Political donations made by individuals on their own behalf and unrelated to the company's business should comply with local laws and regulations.

In the U.S. and other jurisdictions, various federal, state, and municipal laws and regulations impose specific restrictions and rules with respect to political contributions, both those made on behalf of the company or made by individuals on their own behalf. Violation of these laws

and regulations can carry significant penalties for the company. Brookfield's regional policies on political contributions should be consulted and adhered to before making any political contributions on behalf of the company or by individuals on their own behalf.

Do not engage in any lobbying activities on behalf of the company without specific authorization.

The company encourages its employees, officers and directors to take an active role in public service. However, any participation in this regard is to be undertaken as an individual and not as a representative of the company.

Lobbying activities generally include attempts to influence the passage or defeat of legislation and it may trigger registration and reporting requirements. In many jurisdictions, the definition of lobbying activity is extended to cover efforts to induce rule-making by executive branch agencies or other official actions of agencies, including the decision to enter into a contract or other arrangement.

You should not engage in lobbying activities on behalf of the company without the prior written approval of the company's internal legal counsel or person(s) designated to approve such activities.

Additionally, the Brookfield's regional policies on political contributions should be consulted and adhered to before undertaking any lobbying activities, personally or on behalf of the company.

VII. CHARITABLE DONATIONS

Do not solicit or offer donations to suppliers, vendors or public officials in a manner which communicates that a donation is a prerequisite for future business or that the offer of a donation is intended to obtain or retain business and a business advantage.

We encourage our directors, officers and employees to contribute personal time and resources to charities and non-profit organizations. However, unless the solicitation is supported by the company, you are prohibited from using the company name or company resources for solicitation of donations.

All requests for corporate donations to charities and other not-for-profit organizations should be approved in advance by the company's Senior Management (CEO/CFO) or person(s) designated to approve such donations. Charitable donations made by individuals on their own behalf should comply with local laws and regulations.

To help ensure that our practices are reasonable, appropriate and otherwise in accordance with applicable regulatory requirements, the making of certain solicited donations must be logged and/or pre-approved. If you are requested by a public official to make a donation to a particular charity, please consult with internal legal counsel or person(s) designated to approve such donation before agreeing to or making the donation.

If you are requested by a public official to make a personal donation to a particular charity, please consult with internal legal counsel or person(s) designated to approve such donations before agreeing to or making the donation.

VIII. RECORD-KEEPING

Record all our transactions in a complete, accurate and detailed manner so that the purpose and amount of the transaction is clear.

In addition to prohibiting bribery, some anti-bribery legislation, such as the Foreign Corrupt Practices Act, require proper record-keeping and the establishment and maintenance of an adequate system of internal controls. The purpose of these provisions is to prevent companies from concealing bribes and to discourage fraudulent accounting practices.

All transactions must be recorded completely, accurately and with sufficient detail so that the purpose and amount of any such payment is clear. No undisclosed or unrecorded funds or assets of the company should be established for any purpose. False, misleading, or artificial entries should never be made in the books and records of the company for any reason.

IX. REPORTS AND COMPLAINTS

Internal reporting is critical to the company's success, and it is both expected and valued. You are required to be proactive and promptly report any suspected violations of this Policy, or any illegal or unethical behavior of which you become aware, including, to any situations where a public official or other party requests or appears to request an inappropriate benefit. The confidentiality of reported violations will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review and subject to applicable law. No retribution or retaliation will be taken against any person who has filed a report based on the reasonable good faith belief that a violation of the policy has occurred or may in the future occur.

Employees should report violations of the Policy to their supervisor, since their supervisor is generally in the best position to resolve the issue. Alternatively, you may contact the Human Resources ("HR") or company's internal legal counsel to report potential misconduct or code violations of this Policy, or if you have any specific or general questions. Directors should promptly report violations to the chair of their Board of Directors. 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 the company's reporting hotline or email

The Code provides guidance on reporting complaints, including contact information for our reporting hotline, which is managed by a third-party and allows for anonymous reporting of suspected violations.

Disciplinary Action for Policy Violations

Please note that we reserve the right to take disciplinary action for Policy violations that fits the nature and particular facts of the violation. This could, in the most severe circumstances, include immediate termination for cause and, if warranted, legal proceedings may be brought

against you.

X. KEY CONTACTS.

In case any employee wants to reach out, regarding any bribery or corruption matter can register their complain through any of the three methods indicated below:

- *The complainant may call to dial toll free hotline number as **1800-102-2525 during 7.00 am to 11.00 pm (IST)**. The complaint may be registered in English, Hindi, Telugu, Tamil, Marathi, Kannada, Malayalam and Bengali language*
- *The complaint may be registered to a dedicated email ID of peakinfra@ethicshelpline.in*
- *The complaint materials may be posted to a dedicated postal address of P.O. Box No. 71, Sub Post Office, Plot No. 6/14, DLF Qutub Enclave, DLF Phase 1, Gurgaon – 12202, Haryana, India*

All the three communication channels are managed by an independent third party. All the information relating to the communication helpline are available on a dedicated website www.peakinfra.ethicshelpline.in

If you have any questions on this policy, please contact:

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