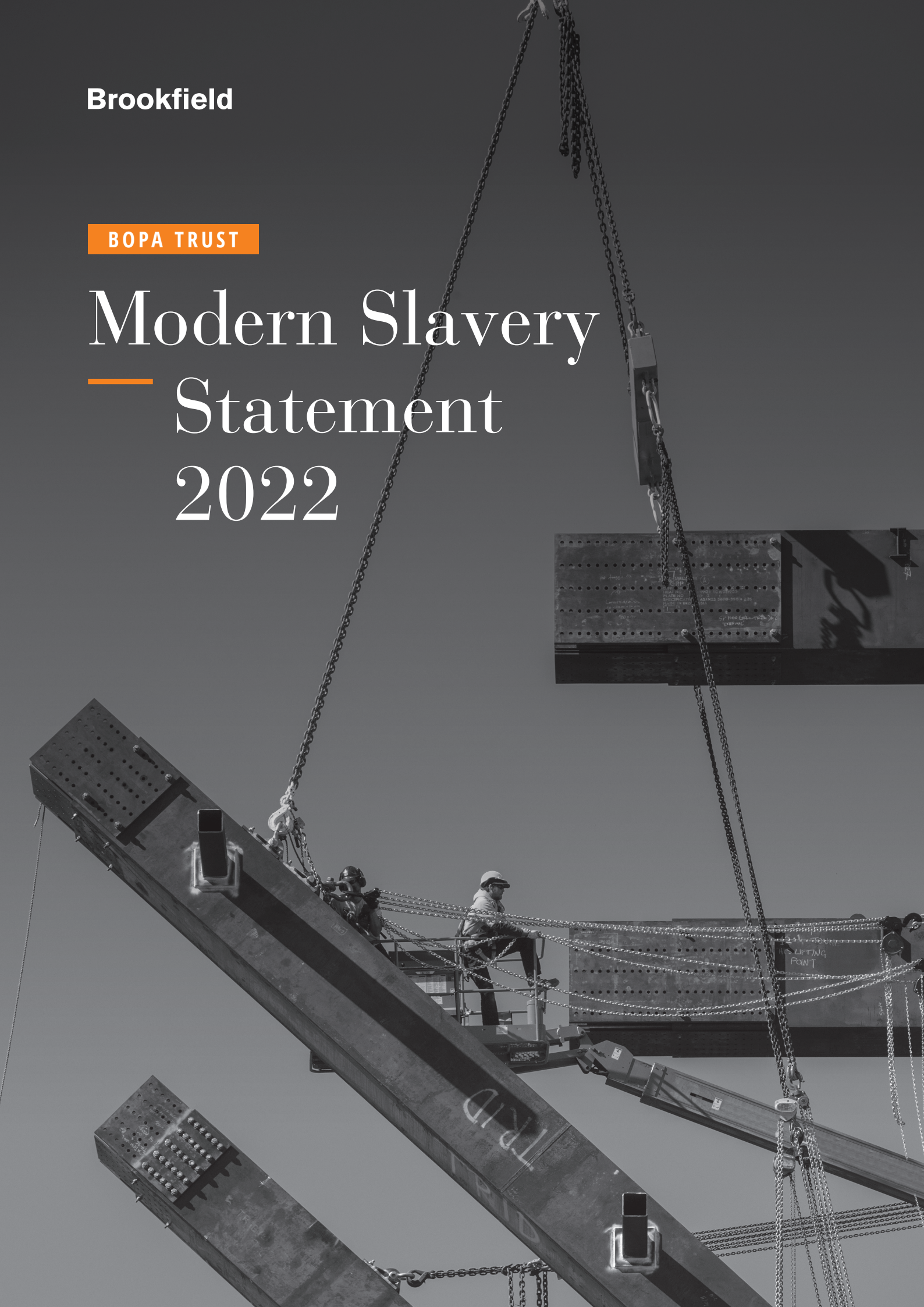


Brookfield

BOPA TRUST

# Modern Slavery Statement 2022



# Commitment

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Brookfield Asset Management Inc. and its BAM Controlled Affiliates<sup>1</sup> (“**Brookfield**”) is a premier global alternative asset manager. With a 100+ year heritage as an owner and operator, we focus on investing in assets and businesses that help form the backbone of the global economy. Throughout our operations in more than 30 countries on five continents, we are committed to supporting and enhancing the communities in which we operate.

We continue to align our business practices with leading frameworks for responsible investing and are an active participant in industry forums and other organizations. We are a signatory to the United Nations-supported Principles for Responsible Investment (“PRI”), which demonstrates our ongoing commitment to responsible investment and ESG best practices.

We are committed to conducting business in an ethical and responsible manner, including by carrying out our activities in a manner that respects and supports the protection of human rights through:

- Eliminate discrimination in employment;
- Prohibit modern slavery, including child and forced labor; and
- Eradicate harassment and physical or mental abuse in the workplace.

Brookfield has assembled a working group comprised of representatives of its business groups and members of its regional teams (“**Working Group**”), which coordinate the development and implementation of Brookfield’s modern slavery approach. The Working Group works to properly integrate this approach with Brookfield’s core business activities, including contracts, due diligence processes, training and communications, as appropriate. The Working Group has developed this framework through consultation with relevant internal stakeholders and, where appropriate, external advisors to verify that the operations and processes meet all applicable legal requirements.

1. “BAM Controlled Affiliates” means the following BAM publicly traded, controlled affiliates: Brookfield Business Partners LP, Brookfield Infrastructure Partners LP, Brookfield Infrastructure Corporation, Brookfield Property Partners LP, Brookfield Property REIT Inc., Brookfield Renewable Partners LP, Brookfield Renewable Corporation, Brookfield Public Securities Group and Brookfield Hedge Solutions Advisors. For clarity, this statement does not apply to personnel of: (a) BAM business lines that operate independently pursuant to an information barrier (e.g., Oaktree Capital Group, LLC, Atlas OCM Holdings, LLC and their respective subsidiaries), (b) portfolio companies and other assets/investments of BAM-managed client accounts, and (c) the operating subsidiaries of the BAM Controlled Affiliates.

# Scope

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The Commonwealth Modern Slavery Act 2018 (“MSA Australia”) require certain Brookfield entities to set out the steps taken to identify and mitigate the risks of slavery and trafficking in its business and supply chains in Australia. This Statement is made in accordance with MSA Australia and relates to the period January 1, 2021 to December 31, 2021.

This Statement is made by BOPA Trust and its controlled reporting entities (referred as “reporting entity”, “we”, “us”), which is indirectly owned by Brookfield Property Partners L.P. (“BPY”), Brookfield’s global real estate holding vehicle. Brookfield Property Partners L.P. owns and operates a globally diversified portfolio of high-quality assets. The trustee of the BOPA Trust is an indirect wholly-owned subsidiary of Brookfield Asset Management Inc. (“Brookfield”). The principal activity of BOPA Trust is leasing of commercial real estate.

We recognize that the risks of modern slavery and human trafficking are complex and evolving, and we continue to work to address these in our business. Our approach and processes are periodically reviewed and, where appropriate, updated as necessary to reflect changes in circumstances and practice.

This Statement has been prepared by the Working Group and has been approved by the Board of BOP Australia Pty Ltd as Trustee for the BOPA Trust on June 30, 2022.



Signed by:  
**Shane Ross**  
**Director**

# Summary of Key Activities in 2021

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## **BROOKFIELD IMPLEMENTED THE FOLLOWING STRATEGIES IN 2021.**

### **GLOBAL POLICY**

Expansion of the Brookfield Modern Slavery and Human Trafficking Policy to a global modern slavery policy that equally applies to BOPA Trust.

### **INDUCTION TRAINING**

Expanded modern slavery training during the onboarding process to all employees.

### **VENDOR MANAGEMENT + CODE OF CONDUCT**

During the course of 2021, we evolved our vendor management program, including developing a Vendor Code of Conduct which sets out our expectations of vendors that provide goods or services to Brookfield, including, where applicable, to have the necessary policies and procedures in place to support such commitments within their supply chain.

### **INVESTMENT DUE DILIGENCE PROCESSES**

Added a separate human rights and modern slavery risk assessment to our due diligence process with the objective, where applicable, of mitigating the risks of modern slavery and human rights violations for potential investments, including supply chains.

# Our Business Activities

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## ASSESSING MODERN SLAVERY RISK

Our approach to addressing modern slavery is designed to be commensurate with the risks we face, which vary based on several factors, including jurisdiction, industry and sector.

## MODERN SLAVERY RISK PROFILE

### 1. THIRD-PARTY VENDORS

Given the nature of our business and the geographic locations in which we operate, third-party suppliers and vendors used across the Brookfield business generally fall under the below categories:

#### **Outsourcers**

Where a business activity or professional service is outsourced to another organisation.

#### **Vendor software providers**

This includes off-the-shelf software, that is hosted in Brookfield data centers, including hardware vendors used to facilitate business processes.

#### **Cloud/hosted it services**

Encompasses a range of IT services provided in various formats.

#### **Data providers**

Organizations that provide data, which feed into our systems or terminals that provide access to market data.

#### **Professional services**

Includes consulting, legal, accounting, training, audit, banking and education.

#### **Office maintenance**

Includes property development, building repairs and maintenance, cleaning, security, utilities, and public services.

We believe that the risk of modern slavery within these providers is low. We acknowledge that, to a lesser extent, we engage with suppliers who may be considered higher risk in terms of modern slavery, such as suppliers of office stationery, and cleaning and catering services. We recognize that each of our suppliers has its own supply chain, and our vendor assessments include this risk to the extent possible. We currently have limited visibility of these extended supply chains, excluding projects where subcontractors or materials require our approval.

## 2. EMPLOYEES

BOPA Trust does not employ employees. Relevant real estate management functions are provided to the reporting entity by an affiliate, Brookfield Properties Australia Pty Ltd (referred to as “Brookfield Properties”). References to employees made in this statement refer to the employees of Brookfield Properties, predominantly located in Sydney, NSW.

## 3. BUSINESS OPERATIONS – INVESTMENTS

During the initial due diligence phase of an investment, we proactively identify material ESG risks and opportunities relevant to the particular asset. We leverage our investment and operating expertise and utilize industry-specific guidelines that incorporate Sustainability Accounting Standards Board guidance.

In 2021, we added a separate human rights and modern slavery risk assessment to our ESG investment due diligence process with the objective of mitigating the risks of modern slavery and human rights violations for potential investments, including supply chains. Where required, we perform deeper due diligence, working with internal experts and third-party consultants as needed.

## MANAGEMENT OF MODERN SLAVERY RISKS

### 1. GOVERNANCE

We recognize that strong governance is essential to sustainable business operations, and we aim to conduct our business according to the highest ethical and legal standards. Our approach to addressing modern slavery is designed to be commensurate with the risks we face, which vary based on several factors, including jurisdiction, industry and sector. Key supporting policies and guidelines include, but are not limited to:

#### **Anti-slavery and human trafficking policy**

This sets out BOPA Trust’s procedures to identify and mitigate the risks of modern slavery and human trafficking within our business and supply chain, including anti-slavery training and risk assessments.

#### **Code of business conduct and ethics**

Our Code outlines our commitment to conducting business in an ethical and responsible manner, including by carrying out our activities in a manner that respects and supports the protection of human rights. Employees are required to certify annually that they have read and complied with our Code and the protocols incorporated therein.

#### **Vendor management procedures**

Brookfield Properties manages key suppliers for the BOPA Trust. During the course of 2021, we evolved our vendor management program, including developing a Vendor Code of Conduct which sets out our expectations of vendors that provide goods or services to Brookfield, including, where applicable, to have the necessary policies and procedures in place to support such commitments within their supply chain.

Brookfield Properties’ approach to addressing high-risk, third-party vendors includes the use of specific contract clauses in legal agreements, requiring vendors to provide their modern slavery statement and evidence of their modern slavery mitigation strategies.

The Hotline is available for vendors and other parties to anonymously report, among other things, any matters relating to suspected unethical, illegal, unsafe or other unwanted behaviors. The reporting hotline is managed by an independent third party and is accessible in multiple languages online and via a toll-free phone number 24/7. Details of the Hotline are actively promoted, including in our Vendor Code of Conduct which is available on Brookfield’s website.

## **ESG due diligence guideline**

During the initial due diligence phase of an investment, we seek to proactively identify material ESG risks and opportunities relevant to the particular asset. We leverage our investment and operating expertise and utilize industry-specific guidelines that incorporate Sustainability Accounting Standards Board guidance. We also have added a separate human rights and modern slavery risk assessment to our due diligence process with the objective of mitigating the risks of modern slavery and human rights violations for potential investments, including supply chains.

## **Financial crime policies**

These include our anti-bribery and corruption, and anti-money laundering programs that are designed to prevent financial crime and the movement of money derived from crime (including crimes relating to modern slavery).

## **Positive work environment policy**

This outlines our commitment to providing a workplace free of discrimination, violence and harassment and summarizes the responsibilities of employees to understand: (i) what constitutes workplace discrimination, violence and harassment; (ii) their obligations to maintain an environment where these behaviors are not tolerated; and (iii) how to report incidents following proper procedures.

(together, the **“Policy Framework”**)

Our Policy Framework is reviewed periodically and updated as necessary.

## **2. TRAINING**

All Brookfield Properties employees receive modern slavery training during the onboarding process. Further training relevant to applicable regions and roles, particularly in functions such as procurement is provided.

## **3. RISK ASSESSMENT**

Risk assessments are important to our efforts to promote the eradication of modern slavery. The slavery risk for each entity varies based on the nature of its business operations. The risk-based approach enables the reporting entities to focus efforts where most required. Our Anti-Slavery and Human Trafficking Policy requires risk assessments to be conducted annually to assess the nature and extent of exposure to modern slavery risks in our operations and supply chains.

## **4. REMEDIATION**

Where possible, we will seek to use our influence to resolve any identified concerns.

## **5. WHISTLEBLOWING HOTLINE**

Brookfield Properties maintains the Hotline for its employees, vendors and other parties to anonymously report, among other things, any matters relating to suspected unethical, illegal, unsafe or other unwanted behaviors. Modern slavery and human trafficking issues are reportable on this hotline. The reporting hotline is managed by an independent third party and is accessible in multiple languages online and via a toll-free phone number 24/7.

## **6. MEASURE OF EFFECTIVENESS**

BOPA Trust acknowledges that modern slavery and human trafficking are possible risks within our operations and supply chain. The Working Group undertakes various steps to address these risks in our business, including reviewing our policies and business practices to ensure they reflect our commitment to:

- Implementing and enforcing effective systems and controls designed to reduce the risk of modern slavery in our business and supply chains; and
- Transparency through our disclosure obligations.

We monitor and assess the effectiveness of our modern slavery program through:

- Regular engagement and feedback from key stakeholders, including through active promotion of our reporting Hotline;
- Operational risk and mitigation plan reporting to the relevant boards and senior executives; and
- Refining our vendor management and due diligence processes.