

Risk Assessment Form

Erase Form

Print Form

Company Name:

1. Supplier Type	ABC Risk Ranking Considerations
Government Entity/ Public Official	High - Public official/government entity other than below or Indigenous Administration/Government Low - where payments are prescribed and published for a specific purpose such as permits, licenses, applications, filings, property taxes
Lobbyist	High - lobbying on Brookfield Renewable's behalf or is a trade association / PAC in the US
Developer	High - development activities carried out on behalf of and/or sold to Brookfield
Consultant; Service Provider	High - where a third party contracting with Brookfield Renewable will be acting on our behalf providing oversight and payments; obtaining permits and licenses and/or has substantial contact with regulators and stakeholders Medium – where a third party contracting with Brookfield Renewable will be engaging subcontractors to complete the work Low - where a third party contracting with Brookfield Renewable will not be engaging or interacting with any other third party
Construction Contractor	High - where a third party contracting with Brookfield Renewable will be acting on our behalf providing oversight and payments; obtaining permits and licenses and/or has substantial contact with regulators and stakeholders Medium – where a third party contracting with Brookfield Renewable will be engaging subcontractors to complete the work Low - where a third party contracting with Brookfield Renewable will not be engaging or interacting with any other third party
Goods/Parts Provider	Low - supplying Goods/Parts
Joint Venture Partner	High - acting on Brookfield Renewable's behalf
Donation	High - over \$10,000 and to a high risk country¹ Medium - over \$10,000 and to low or medium risk country¹ Low - \$10,000 and under
Customs Agent or Broker	Medium - providing customs clearance
Landowner ²	High - Landowner from a High risk country¹ Medium - Landowner from a Medium risk country¹ Low - Landowner from a Low-risk country
Other ^{3, 4, 5}	High - as guided by risk assessment Medium - as guided by risk assessment Low - as guided by risk assessment

Risk Ranking

High | Medium | Low

¹**Low-Risk (Country score of 70+)**
Medium-Risk (Country score of 50-69)
High-Risk (Country score of 0-49): Switzerland, Luxembourg, Hong Kong, Cayman Islands, Singapore (due to level of bank secrecy) and any Medium-Risk activity taking place in a North American country other than Canada, the U.S. (e.g. Mexico, Puerto Rico)
Please see ranking for most current year and classify accordingly to <http://www.transparency.org/research/cpi/overview>
² **Landowner:** Leaseholder of a land used for power generation (wind farm, solar farm, etc.)
³ **Other:** Utility, Telecom and Communications, Real Estate and rental Properties, Financial Services, Legal Services, Health Benefits, etc.
⁴ **Other (Excluded Suppliers):** Excluded suppliers include established professional services firms, individual consumers (B2C), low-billing commercial clients (B2B), and routine or essential service providers (e.g., telecommunications, insurance, regulated financial institutions, utilities, and subscription vendors). These suppliers may be classified as Low Risk and exempt from enhanced ABC due diligence where all Low-Risk criteria are met, subject to standard screening and professional judgment.
⁵ **Other (ABC Questionnaire Exceptions):** In instances where a completed ABC Questionnaire has not been obtained, onboarding may continue for Utility and Government or Public Service Providers providing essential, routine and fee-based services, including regulated utilities, municipal services, and standard permitting, subject to a documented risk-based determination of low bribery and corruption risk.

Company Name:

2. Background ABC Risk Ranking Considerations	
	Tier 1 - High Risk - Findings present serious integrity, legal, or compliance concerns that could materially impact Brookfield’s ability to engage or continue engagement with the supplier. Indicators: - Confirmed or credible allegations of bribery, corruption, or facilitation payments. - Supplier or affiliate appears on sanctions, debarment, or exclusion lists (e.g., OFAC, UN, EU, World Bank, or national government lists). - Supplier or affiliates appear on state-owned entities (SOE), or on a list of those debarred from bidding on local, national or international contracts (e.g. Workday Bank Listing of Ineligible Firms & Individuals). - Supplier or affiliates are on a watch list and/or politically exposed persons (PEP) database. - Supplier, owner, or key personnel subject to ongoing or unresolved ABC allegations, investigations, or convictions. - Significant reputational concerns identified through media reviews, adverse reporting, or public scrutiny. - High inherent exposure to bribery, sanctions, or fraud risk that cannot be adequately mitigated by contractual controls. - Confirmation in media of fatalities, significant health and safety incidents, or systemic safety failures. - These must be communicated promptly to the relevant workstream. - Media coverage indicating direct government interaction or exposure through intermediaries where corruption risk is elevated. Typical Scenarios: - Media allegations involving customs or clearing brokers facilitating imports. - Agents or intermediaries referenced in media coverage relating to permits or interactions with government officials. - Developers or contractors featured in adverse media regarding zoning, environmental approvals, or regulatory interactions. - Lobbyists or public facing Intermediaries linked in reporting to improper government influence, conflict-of-interest allegations, or political integrity concerns. Tier 2 - Medium Risk - Findings are limited, historical, or indirectly relevant to Brookfield’s engagement and do not materially elevate exposure. Indicators: - Media coverage of historical or resolved regulatory or legal issues (e.g., environmental fines, operational breaches). - Adverse media suggesting reputational or governance concerns, but without ABC or sanctions implications. - Indirect government exposure or subcontracting risks noted in reporting. - Minimal regulatory or public-facing exposure. Typical Scenarios: - Contractors or developers with previously reported regulatory issues but no ongoing concerns. - Consultants or Service Providers noted in reporting for governance weaknesses or operational issues, without any ABC allegations. Tier 3 - Low Risk - Findings are immaterial, fully mitigated, or consistent with expectations given the supplier’s size, reputation, and inherent risk profile. Indicators: - Clean background or immaterial findings (e.g., unrelated affiliate issues or general market coverage). - Minor reputational issues or civil disputes unrelated to corruption or ethics. - Media highlighting routine operational challenges, typical of the industry (e.g., supply chain delays, customer service issues) without ethical or legal implications. Typical Scenarios: - Professional or Technical Service Providers (e.g., engineering, IT, advisory) with clean or neutral media footprints. - Regulated Utilities or Telecom Providers appearing only in routine market, operational, or regulatory filings with no reputational concerns. - Large multinational financial institutions, custodians, or fund administrators. - Suppliers providing standardized goods or routine administrative support services. - Donation or Community Partners featured in positive or neutral reporting related to program delivery or local activities.
Risk Ranking	High Medium Low

3. Government and Political Affiliations					ABC Risk Ranking Considerations				
					Tier 1 – High Risk - Findings indicate direct or significant connections to government entities or officials, creating a heightened risk of influence, conflicts of interest, or undue advantage. Indicators: - The third party is wholly or partially owned, directly or indirectly, by a government entity, government official, or their close family member (e.g., spouse, parent, sibling, in-law). - The third party maintains close personal or business ties with a government entity, government official, or their family members. - The third party uses consultants, intermediaries, or agents (e.g., lobbyists) to win or retain government contracts or obtain licenses or approvals. - The third party participates in joint ventures or partnerships with government or quasi-government entities, including Indigenous administrations, where fees are not prescribed or transparent. - The third party is retained primarily to improve access to, or influence over, government contracts or approvals. - The third party has discretionary authority to manage government interactions independently, without Brookfield oversight. Tier 2 – Medium Risk - Findings indicate limited or indirect government connections, where exposure exists but is controlled through Brookfield’s structure, oversight, or contract mechanisms. Indicators: - The third party has minority ownership or participation in a joint venture or project involving a government or quasi-government entity. - The third party engages occasionally with government or state-linked organizations, but activities are routine or procedural. - Political or media links to government entities exist but are tangential and of low materiality. Tier 3 – Low Risk - Findings indicate transparent, prescribed, or administrative interactions with government entities. Indicators: - Government interactions are limited to standardized, published, and non-negotiable fees (e.g., routine permits, licenses, filings, property taxes). - The third party has no authority or opportunity to influence government decisions, officials, or regulatory outcomes. - Engagements involve administrative compliance tasks only, where timelines and requirements are pre-defined. - All interactions are routine, well-documented, and embedded in Brookfield’s normal approval and procurement workflows. - No meaningful political ties, familial links, or financial relationships with government officials appear in adverse media or public records.				
Risk Ranking					High Medium Low				

4. Validation	
Proposed Risk Rating Proposed by	Proposed Risk Rating
Comments	