Brookfield
Renewable Partners

BROOKFIELD RENEWABLE PARTNERS L.P.

THIRD PARTY DUE DILIGENCE PRINCIPLES
BRIBERY AND CORRUPTION RISKS

February 2026

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I. Applicability

These third party due diligence principles for bribery and corruption risks ("Principles") are established to provide a mandatory framework within which Brookfield Renewable Partners L.P., Brookfield Renewable Corporation, and all controlled subsidiaries and, as applicable, general partners (collectively, "Brookfield Renewable", "we", "us", "our" or the "Organization") will conduct anti-bribery and anti-corruption due diligence (hereafter "due diligence") on third parties who provide goods and services to the Organization.

Where Brookfield Renewable is an investor in an entity that it does not manage or control (including, for instance, a joint venture or partnership), we will make commercially reasonable efforts to ensure that the assets and operations of that entity are managed in a manner consistent with these Principles, as applicable.

II. Background

Brookfield Renewable transacts and does business with a variety of third parties, including vendors, consultants, partners, service providers, government entities, charities, and landowners (hereafter "third parties"). As stated in our Anti-Bribery and Anti-Corruption Policy (the "ABC Policy"), Brookfield Renewable is committed to conducting its business with honesty and integrity and in full compliance with applicable bribery and corruption laws. The ABC Policy and Vendor Code of Conduct reflect the standards to which any person or entity should adhere when acting on Brookfield Renewable's behalf, including partners, agents and contractors.

To support this commitment, we require that appropriate due diligence be conducted with respect to third parties. Effective due diligence can mitigate third party liability issues and help manage associated reputational, legal, and financial risks.

Third parties are not permitted to pay, offer, accept or request bribes on behalf of Brookfield Renewable. While working with third parties is a necessary part of the business, Brookfield Renewable could be found liable in certain circumstances if third parties we retain make improper payments on our behalf. Accordingly, we cannot ignore "red flags" regarding the actions of anyone working in connection with our Organization.

These Principles should be read in conjunction with Brookfield Renewable's Anti-Bribery and Anti-Corruption Program (the "ABC Program"), Corporate Procurement Principles, and Vendor Code of Conduct.

III. Principles

Brookfield Renewable operates in a decentralized manner, with portfolio companies and regional operating businesses (each a "Portfolio Company") typically being responsible for managing their business with third parties. Each Portfolio Company must establish, implement, and maintain its own third-party due diligence protocol ("ABC Protocol") and associated processes and controls that comply with these Principles.

The goal of these Principles is to ensure that due diligence is performed on all third parties, including providing guidelines on how to proceed when a third-party is being engaged in an activity or geography where there is heightened bribery risk, including:

- Assisting in sales process (public and private sector), including raising capital and bidding processes
- Dealing with governments and/or public officials (e.g., for permits, licenses, approvals,

taxes, lobbying, customs, immigration)[1]

- Acting as an agent or otherwise representing Brookfield Renewable in dealings with outside parties
- Involved in large development projects (e.g., vendors providing major components, EPC providers, etc.)
- A high risk of bribery based on jurisdiction-specific factors (e.g., vendor type is a known conduit for bribery in a country, good/service being procured in a high bribery risk jurisdiction)[2]

In certain situations, bribery risk may be minimal and not require performance of all requirements in the due diligence process. Each situation should be evaluated based on particular facts and circumstances. Each Portfolio Company should describe its process in its own ABC Protocol. Any deviations from the requirements below must be documented and approved by Brookfield Renewable corporate risk management.

The attached sample template outlines the standard that is expected to be met and can be used by Portfolio Companies to establish their own ABC Protocol.

IV. Requirements

Each Portfolio Company must establish, implement, and maintain its own ABC Protocol and associated processes and controls to conduct due diligence and establish appropriate monitoring and risk mitigating activities with third parties.

The process for assessing and managing the bribery and corruption risks associated with third parties shall consist of the following steps:

1. Collect information about the third party
2. Assess risk and conduct additional due diligence, as appropriate
3. Negotiate contract terms in conjunction with the legal department (if applicable)
4. Document and maintain records of the due diligence performed and conclusions reached
5. Establish appropriate monitoring and risk mitigating activities

The extent of due diligence conducted should be based on the evaluation of bribery and corruption risk (i.e., higher degree of bribery and corruption risk requires more extensive due diligence). The specific methods for due diligence will vary depending on the bribery and corruption risks identified. The ABC Protocol should require that, throughout the relationship with the third party, attention should be given to potential red flags that may arise.[3]

Key application principles:

[1] Government includes a department, agency or instrumentality of a government or public international organization. This is a broad definition and includes public health agencies, water authorities, and public international organizations such as the UN or World Bank. An “instrumentality” may also include government-owned or controlled businesses, including sovereign wealth funds. For example, if a government has interest in a bank and exercises control over the activities of that bank, then the bank is likely to be considered an “instrumentality”. A “public official” is any person who is employed by or is acting in an official capacity for a “government”, including elected or appointed persons who hold legislative, administrative, or judicial positions such as politicians, bureaucrats, civil services and judges

[2] Refer to Brookfield Renewable Anti-Bribery and Corruption Program for definition of a high bribery risk country.

[3] Red flags are activities that increase the likelihood of a potential violation of the ABC Policy or relevant bribery and corruption laws. Red flags are not meant to stop our interaction with the third party but rather to indicate that caution and additional scrutiny may be required. These red flags often occur outside the normal contracting and initial transaction process.

- Supplier type is an important driver of inherent ABC risk. Background checks validate and inform the assessment but do not independently determine the final risk rating.
- Materiality and context matter. Findings should be assessed for relevance to business' relationship with the supplier and whether they are recent, ongoing, or remediated.
- Documented judgment is required. The rationale supporting the final risk classification should be recorded in the Risk Assessment Form (RAF).

In limited circumstances[4], an engagement may proceed on a risk-based basis with a streamlined due diligence approach, including where a supplier qualifies for Low-Risk exclusion, provided the rationale is documented and appropriate approvals are obtained where required.

In line with the Portfolio Company's Procurement Policy, Portfolio Companies should ensure that third parties acting on their behalf have agreed to abide by the Vendor Code of Conduct and to act consistently with its principles. In addition, depending on the identified risks, Portfolio Companies should ensure that third parties acting on their behalf understand the ABC Policy and agree to act in a manner consistent with those policies. Where appropriate, third parties should be required to provide certifications confirming their understanding and adherence to these policies. Other contractual provisions and risk mitigation plans, including training and ongoing monitoring, may also be appropriate, depending on the risks identified.

V. Supplier Exclusion Framework

Certain third-party categories may be classified as Low Risk and excluded from enhanced anti-bribery and corruption due diligence where their inherent risk exposure is minimal, and existing procurement and contracting controls provide sufficient mitigation.

These include:

- Established professional services firms providing standardized advisory services, such as audit, tax compliance, technical engineering advisory, or legal advisory services that do not involve government representation or permitting advocacy
- Regulated utilities, telecommunications providers, and financial institutions, such as electricity grid operators, water and wastewater providers, telecom carriers supporting site connectivity, regulated banks, and insurance providers supporting asset operations.
- Municipal or public authorities providing non-discretionary, fee-based services, such as property tax administration, land registry filings, standard building or occupancy permits, right of way permits, and routine environmental, health, safety, or code inspections required for renewable facilities
- Low value, standardized commercial transactions, such as site level maintenance supplies, monitoring software subscriptions, safety training registrations, or other routine operational purchases under standard commercial terms

Supplier exclusions apply only where all applicable Low Risk criteria are satisfied and remain subject to standard screening, including identity verification, sanctions, adverse media, and political exposure checks, as well as the application of professional judgment. Where a supplier is classified as Low Risk, completion of a Risk Assessment Form is not required.

[4] Limited circumstances refer to engagements involving supplier categories assessed as Low Risk based on inherent characteristics and typical activities, including established professional services firms providing standardized advisory services without government representation, individual consumers, small commercial clients engaged in low value routine transactions, and routine or essential service providers such as regulated utilities, telecommunications providers, insurance suppliers, regulated financial institutions, subscription services, and similar operational vendors. Classification remains subject to screening results and the application of professional judgment.

The Portfolio Company must apply a risk-based approach when determining whether a supplier qualifies for exclusion, considering the nature of the supplier, the services provided, the level of government interaction, and the adequacy of existing controls to manage any residual risk.

VI. Frequency of ABC Reviews

Due diligence should be repeated on third parties with the following frequency:

- HIGH RISK: Annually
- MEDIUM RISK: Every three years
- LOW RISK: Every five years

The Portfolio Company might choose to recertify the ABC rating on third parties more frequently should circumstances warrant, such as a significant change in the scope of services or work to be performed in a new jurisdiction.

VII. Protocol Owner

The Chief Risk Officer, General Counsel, or equivalent of the Portfolio Company ("Protocol Owner") will be responsible for establishing controls and procedures that ensure the requirements of these Principles are appropriately implemented.

The Protocol Owner should review and approve the ABC Protocol upon its establishment and any subsequent changes thereafter.

VIII. Key Contacts

The Corporate team is available to support the preparation and roll-out of these Principles. Please contact:

Kira Hataley
Corporate Risk Management
Email: Kira.Hataley@brookfield.com

IX. SAMPLE PORTFOLIO COMPANY ABC PROTOCOL TEMPLATE

The prevention and detection of bribery is a priority for governments around the world. In 2009, the member countries of the Organization for Economic Cooperation and Development (OECD) established an Anti-Bribery Convention that created legally binding standards to criminalize bribery of foreign public officials in international business transactions. Most major countries in the world have laws against foreign bribery and virtually all countries have laws against bribery within their own borders. Certain laws also make it an offence for failing to prevent bribery. In addition to strengthening laws with respect to bribery, regulators also continue to focus on enforcement.

Background

As stated in our Anti-Bribery and Anti-Corruption Policy (the "ABC Policy"), [Portfolio Company] is committed to conducting its business with honesty and integrity and in full compliance with applicable bribery and corruption laws. The ABC Policy reflects the standards to which any person or entity should adhere when acting on the [Portfolio Company]'s behalf, including partners, agents and contractors.

To support this commitment, [Portfolio Company] requires that appropriate due diligence be conducted with respect to its third parties. Effective due diligence can mitigate third party liability issues and help manage associated reputational and financial risks.

Third parties are not permitted to pay, offer, accept or request bribes on behalf of the [Portfolio Company]. While working with third parties is a necessary part of the business, the [Portfolio Company] needs to be mindful that it may be prosecuted for failing to prevent bribery by a third party acting on its behalf.

The [Portfolio Company]'s Anti-Bribery and Anti-Corruption Program (the "ABC Program") provides additional information on our approach to help prevent and detect bribery as part of our overall internal control framework.

This protocol provides additional information on the due diligence and bribery risk assessment process when assessing third parties and should be read in conjunction with the Vendor Code of Conduct.

Key Principles

The [Portfolio Company] transacts and does business with a variety of third parties, including vendors, consultants, partners, service providers, government entities, charities, and landowners (hereafter "third parties").

Third parties will be assessed for bribery and corruption risk and assigned a risk category ranking. In some situations, business judgment will be required in assigning the risk category. Risk mitigating procedures and monitoring activities should be established for each of the risk categories as appropriate.

Throughout the relationship with the third party, attention should be given to potential red flags that may arise. Red flags are activities that increase the likelihood of a potential violation of the ABC Policy or relevant bribery and corruption laws. Red flags are not meant to stop our interaction with the third party but rather to indicate that caution and additional scrutiny may be required. These red flags often occur outside the normal contracting and initial transaction process. Refer to Appendix A for examples of red flags.

Protocol Owner

The [Chief Risk Officer, General Counsel or equivalent] is responsible for establishing controls and procedures that ensure the requirements of this protocol are appropriately implemented.

Process

The process for assessing and managing the bribery and corruption risks associated with third parties consist of the following steps:

1. Collect information about the third party; verify and evaluate the collected information
2. Assess risk and conduct additional due diligence, as appropriate
3. Negotiate contract terms in conjunction with legal department (if applicable)
4. Document and maintain records of the due diligence performed
5. Establish appropriate monitoring and risk mitigating activities

In evaluating a third-party engagement, the [Portfolio Company] should consider the nature of the supplier and the role it will perform. Certain supplier types, including intermediaries, agents, or contractors interacting with public officials or regulators, inherently present greater exposure, while suppliers providing standardized, routine, or regulated services typically present lower inherent risk.

The extent of due diligence conducted should be based on the evaluation of bribery and corruption risk (i.e., higher degree of bribery and corruption risk requires more extensive due diligence). The specific methods for due diligence will vary depending on the bribery and corruption risks identified. Higher risk engagements may warrant enhanced due diligence and ongoing monitoring. Lower risk engagements may be addressed through a limited due diligence review under which certain third-party relationships may be assessed as Low Risk.

A supplier may be classified as Low Risk where, based on the nature of the engagement and the supplier's role, inherent exposure to bribery and corruption risk is minimal and existing procurement, contractual, and oversight controls are sufficient to manage residual risk. In such cases, enhanced Anti Bribery and Corruption due diligence is not required. All Low-Risk determinations remain subject to standard screening, which includes verification of the supplier's identity and ownership, review of sanctions and watchlists, adverse media screening, and assessment of political exposure where applicable. Determinations must also reflect the application of professional judgment and documentation of the rationale. Where a supplier is classified as Low Risk, completion of a Risk Assessment Form (RAF) is not required. Supporting documentation should be maintained to substantiate the due diligence conducted and the conclusions reached.

The [Portfolio Company] should ensure that third parties acting on its behalf understand the Vendor Code of Conduct and agree to act consistently with its principles.

Where appropriate, third parties should provide certifications confirming their understanding and adherence to the ABC Policy. Other contractual provisions and risk mitigation plans, including training and ongoing monitoring, may also be appropriate, depending on the third party's risk category.

1. Collect Information about the third party; verify and evaluate the collected information

Know your potential third party and make appropriate enquiries

Information Gathering

Collect required information from third party Appendix B outlined in the Questionnaire.[5] Information gathered through the Questionnaire will assist in determining the level of additional due diligence to be performed.

Prior to engaging with the third party, consider the associated level of bribery and corruption risk, such as:

- The need and business justification to retain the third party
- The residence and operating location, industry, and affiliation of the third party
- The business reputation and qualifications
- The beneficial owners/principals
- The proposed activities and whether the third party will be dealing with government officials or entities (e.g., for permits, licenses, approvals, taxes, lobbying)
- The amount and terms of compensation (i.e., a large success fee would be a red flag)
- Whether the third party will be "acting on our behalf" (e.g., acting as an agent or otherwise representing the Organization in dealings with outside parties)
- Procurement of goods and services in high bribery risk countries or industries
- The results of background checks, media and litigation searches (e.g., Dow Jones diligence or similar), including sanctions screening to determine whether the third party has any links to a Sanctioned Country and/or whether they are listed in any of the following lists[6]:
    i. The United Nations Security Council Consolidated List[7];
    ii. OFAC's Specially Designated Nationals and Blocked Persons list and Consolidated Sanctions List[8];
    iii. The EU's Consolidated List of Persons, Groups and Entities Subject to EU Financial Sanctions[9];
    iv. The UK's Consolidated List of Financial Sanctions Targets[10]; and
    v. Equivalent lists of other countries.

Consider any red flags identified in the verification process and determine whether they can be adequately addressed.

[5] The Questionnaire is not required for the following third parties:
- Government entities
- Utilities and telecom
- Newspapers and subscription services
- Landowners that are individuals or sole proprietors
- Multinational financial and/or insurance institutions
- One-time Vendors of goods and services with purchase less than US$5,000

[6] Review of sanctions would be covered as part of standard risk database searches
[7] https://www.un.org/securitycouncil/content/un-sc-consolidated-list
[8] https://sanctionssearch.ofac.treas.gov/
[9] https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions_en
[10] https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets

2. Assess risk and conduct additional due diligence

The degree of due diligence should be commensurate with the assessed level of bribery and corruption risk

Initial Risk Rating

Based on the information gathered, the degree of bribery or corruption risk should be assessed, and an initial risk rating should be assigned (High, Medium, or Low). A Risk Assessment Form which provides additional risk indicators to consider, may be completed in order to assist with establishing the initial risk rating and must be completed and retained for third parties classified as Medium or High Risk (see Appendix C).

Assign Final Risk Rating

Based on the information obtained, assign and document the Final Risk Rating and determine whether the third party should be approved. The assignment of Final Risk Rating for an initial Medium or High Risk third party and the approval of the third party should be conducted by an individual independent from those proposing to engage the third party.

If the third party is approved, record the final risk rating of the third party in the ERP system[11], negotiate appropriate contract terms and develop other risk mitigation plans as applicable.

Additional Due Diligence

No additional due diligence is required where an initial rating of Low Risk is assigned. However, the inclusion of certain anti-bribery provisions in the contractual agreement should be considered.

Additional due diligence is required where an initial rating of Medium Risk or High Risk is assigned. See Appendix D for additional guidance on performing additional diligence.

3. Negotiate contract terms in conjunction with legal department

Based on the results from previous steps, negotiate appropriate contract terms with the third party

Consult with the legal department as to the form of the agreement or the contract terms that may be required, especially if the third party is acting on behalf of the [Portfolio Company]. Depending on the services or work to be performed, the agreement or contract may include provisions such as:

- Description of goods/services to be provided
- Description of pricing/compensation, payment terms (e.g., billings supported by invoices detailing goods/services provided), and expense reimbursement arrangements (e.g., reimbursement for actual expenses supported by invoices is better than a per diem)
- Procedures for use of subcontractors/agents (e.g., prior approval) and limiting the third party's ability to act on the [Portfolio Company]'s behalf and/or to interact with government officials/entities
- Prohibition on all types of bribery and corruption
- Representation that the third party has appropriate ABC policies and procedures, and anti-bribery representations/undertakings/warranties and

[11] ERP or equivalent management system

regular (e.g., annual) certifications of compliance

- Require the third party to comply with the Vendor Code of Conduct
- Require the third party to maintain accurate books and records, and in some circumstances, require the third party to grant the right to audit the third party's books and records on a regular basis or if an incident arises
- Requirement to notify the [Portfolio Company] of breaches of the agreement and of pending or initiated bribery-related investigations
- Right to terminate contract for and indemnification from breach of terms
- Right to demand information related to possible bribery and corruption incidents
- If applicable, require third party lobbyists to comply with the relevant Political Contributions Policy

Also, be aware of red flags that may arise during negotiations, and therefore require an update to due diligence and risk assessment.

4. Document and Maintain Records of Due Diligence Performed

Be able to show that appropriate due diligence was performed for each third party

Appropriate records should be maintained (i.e., as part of the vendor record in the ERP application or other central location) including the information obtained from the third party or from additional sources used in assessing third party risk. The list of approved vendors should be maintained in the ERP application as part of the vendor master file. A Risk Assessment Form must be completed and retained for third parties classified as Medium or High Risk.

5. Establish appropriate monitoring and risk mitigating activities

Establish the process for identifying changes in the third-party risk ranking

The [Portfolio Company] is responsible for mitigating the risk and monitoring of third parties to identify factors impacting the risk rating.

Where a third party has previously been engaged and assessed for bribery and corruption risk, additional due diligence is not necessary unless the third party has been categorized as High Risk or its risk ranking increases based on the nature of the engagement (e.g., the third party is asked to conduct work in a riskier region).

When engaging the third party that was assessed as High Risk, consider the following risk mitigating activities, where appropriate:

- Include additional ABC provisions in the contract or agreement that are appropriate for the risk rating of the third party;
- Provide training to the third party on the ABC Policy;
- Require the third party to provide certifications confirming their understanding and adherence to the ABC Policy;
- Identify a member of Senior Management to review and approve invoices for payment.

Due diligence on High Risk third parties should be updated at least annually, or sooner if circumstances warrant. For Medium and Low Risk third parties, the due diligence should be updated at least every three and five years, respectively.

Periodically, the [Portfolio Company] should review the list of vendors and identify those that should be deactivated from the approved vendor listing in the ERP application. The assessment should consider the time passed since the last transaction, open purchase orders, requirements for ongoing relationship, etc.

X. APPENDIX A

The prevention and detection of bribery is a priority for governments around the world. In 2009, the member countries of the Organization for Economic Cooperation and Development (OECD) established an Anti-Bribery Convention that created legally binding standards to criminalize bribery of foreign public officials in international business transactions. Most major countries in the world have laws against foreign bribery and virtually all countries have laws against bribery within their own borders. Certain laws also make it an offence for failing to prevent bribery. In addition to strengthening laws with respect to bribery, regulators also continue to focus on enforcement.

Red Flags Checklist

A "Red Flag" is an activity or a condition that increases the likelihood of a potential violation of the ABC Policy or of the anti-bribery and corruption laws. Red flags are not meant to stop our interaction with the third party but indicate that caution and additional scrutiny may be required.

If red flags have been identified, further inquiries, including seeking advice from a member of senior management, internal legal counsel or the corporate risk management team, may be required.

Red flags may be uncovered in responses to the Questionnaire and/or in verifying the information obtained from the third party. Not all red flags suggest that an issue exists or that the [Portfolio Company] cannot engage the third party. However, the appearance of a red flag generally requires more in-depth review. Explanations of the inquiries made, and supporting documentation, should be maintained to substantiate the due diligence conducted and the conclusions reached.

Examples of red flags in dealing with third parties include, but are not limited to the following:

Company Structure

- Refusal to provide details of ownership, partners or principals or to cooperate in the diligence process
- Third party operates in a high-risk country or industry
- Third party has links to a Sanctioned Country or is included on a Sanctions list
- Third party is incorporated in an offshore jurisdiction
- An officer, senior executive or key employee of the third party has an interest in or is related to an officer, senior executive or key employee in another company that might be considered a competitor to the third party
- Third party appears to be a shell company or has some other unorthodox corporate structure

Relationships with Public Officials and Governments

- Third party is directly or indirectly owned in whole or in part by a government entity, a public official or political party
- Third party has been championed (directed) by a public official or representative to be part of the transaction
- Third party principal has a relative or close family relation (e.g., spouse, in-law, sibling,

parent) who has been or is regularly involved with public officials, local or national politicians, potential competitors, political activists, or others in a position to influence business decisions

- Third party employs personnel who are current or former public officials
- Third party or affiliated entities appear on state-owned entities (SOE) databases and have not been disclosed
- A principal, owner, officer, senior executive or key employee of the third party is on a watch-list and/or politically exposed persons (PEP) database

Qualifications/Experience

- Third party does not demonstrate industry experience with products or service, or is in a different line of business than for which it has been engaged
- Third party appears on a sanctions list or a list of those debarred from bidding on local, national or international contracts (e.g., World Bank Listing of Ineligible Firms & Individuals)
- Records from the official registry of companies do not agree with the information provided by the third party regarding ownership, directorships or other details
- Qualifications claimed by the third party are denied by the issuing body
- Third party has had agreements terminated by other clients or partners
- Third Party lacks customarily associated staff and facilities

Investigations

- Third party, including its principals or other employees, has been or is currently suspended or otherwise censored in business dealings or criminally charged with or prosecuted for alleged fraud, bribery, corruption, misrepresentation and/or any other criminal act
- Third party or any of its principals have a reputation for, or have been accused of, corruption or improper business practices (e.g., in the media and otherwise) or it would cause reputational damage where it practices to be publicly reported.
- An official body advises of a criminal conviction that has not been disclosed by third party
- Third party has a pattern of frequent and continued involvement in litigation

Anti-Bribery and Corruption Program

- Third party has not established any internal policies prohibiting corruption or bribery and refuses to put such measures in place
- Third party declines to complete basic intake questionnaire
- Third party makes large or frequent political contributions
- Third party has inadequate policies and controls on gifts and other expenses

Physical Location

- Third party offices are in an unusual area or are otherwise significantly different form similar businesses (e.g., in highly industrial areas, in residential areas, where the company's name is not indicated, have significant levels of security or highly restricted, or are much smaller than expected for the company's size)

- Electoral or local business records show a different location for the third party
- Third party is located in a country other than where its services are being performed

Third Party Payment Requests

- That payment be made to an offshore bank account
- That payment be made through another company or individual
- Terms of the contract indicate payment by cash, substantial up-front or advance payments not customary for the industry, or excessive success fees

References

- Third party offers references who are evasive, uncooperative or not forthcoming
- There are significant variances between the information provided by the third party and the information provided by the references

Other

- Third party makes suspicious statements such as needing money to "get the business" or "make the necessary arrangements"
- Charitable donations should be made with documentation to confirm the ownership, registered charity status and obtaining a tax receipt
- Third party initiates things that suggest a proclivity for or familiarity with corrupt activity and how to manage or manipulate people, systems or safeguards in order to get a desired business outcome
- Third party proposes hiring an affiliate whose skill set and mandate are redundant or whose resume and/or history does not appear suited to the job at hand
- Third party appears to be in a rush to proceed for no discernible reason
- Third party seeks to perform services without a written agreement or refuses to agree to anti-bribery/ corruption provisions/certifications
- Third party has inadequate or no books and records
- Information/responses received from third party are incomplete, inconsistent or misrepresented
- Third party make requests for political or charitable contribution

XI. APPENDIX B

ANTI-BRIBERY AND ANTI-CORRUPTION QUESTIONNAIRE

Brookfield
Renewable

Supplier's Name:

Anti-Bribery and Anti-Corruption *To be completed by supplier.*

As stated in Brookfield Renewable Partners' Anti-Bribery and Corruption Policy (the "ABC Policy"), the Company is committed to conducting its business with honesty and integrity and in full compliance with applicable anti-bribery and anti-corruption laws. The ABC Policy reflects the standards to which any person or entity should adhere when acting on the Company's behalf, including partners, agents and contractors third parties. To support this commitment, the Company requires that appropriate due diligence be conducted with respect to its third parties.

Please ensure the following questions are completed in their entirety and signed by an appropriate organization representative. Omitting information or signature may result in delays or denial of approval.

1. What country are the services being performed in?

2. Country(ies) in which the organization has operations

3. Country of principle office

4. Please describe the primary goods or services being provided

5. Which of the following categories best describes the supplier? *(Check all applicable)*

- ☐ Government Entity or Public Official
- ☐ Indigenous Administration
- ☐ Customs Agent or Broker
- ☐ Other
- ☐ Related Party to BEP
- ☐ Landowner
- ☐ Consultant/Service Provider
- ☐ Lobbyist
- ☐ Good/Parts Provider
- ☐ Construction Contractor

6. **Legal, Regulatory, or Reputational Issues** - Has the supplier, or any of its owners, officers, directors, senior management, or employees, ever been the subject of any allegation, investigation, proceeding, or request for information related to bribery, corruption, fraud, misrepresentation, or similar misconduct? ○ Yes ○ No

If yes, please explain

7. **Government Ownership or Affiliations** - Is the supplier owned, partially owned, or controlled by a government entity, public official, or politically exposed person, or are any owners, officers, directors, senior management, or their immediate family members affiliated with a government entity? ○ Yes ○ No

If yes, please explain

8. **Government Engagement or Representation** - Will the supplier's services involve interaction with government officials or entities, obtaining permits or licenses on our behalf, or participating in partnerships, joint ventures, lobbying, or similar activities with government or quasi-government organizations? ○ Yes ○ No

If yes, please explain

9. **Use of Third Parties or Subcontractors** - Will the supplier engage third parties (e.g., subcontractors, agents, consultants) to perform work or services on our behalf? ○ Yes ○ No

If yes, please explain

10. **Anti-Bribery & Corruption Compliance Program** - Does the supplier maintain a written anti-bribery and anti-corruption policy or compliance program addressing applicable anti-bribery laws? ○ Yes ○ No

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Supplier Representative *To be completed by supplier.*

Name	Position Held
Signature	Date
Comments	

XII. APPENDIX C

RISK ASSESSMENT FORM

Brookfield
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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 country[1] ◯ **Medium** - over $10,000 and to low or medium risk country[1] ◯ **Low** - $10,000 and under
Customs Agent or Broker	◯ **Medium** - providing customs clearance
Landowner[2]	◯ **High** - Landowner from a High risk country[1] ◯ **Medium** - Landowner from a Medium risk country[1] ◯ **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.

Brookfield
Renewable

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:**
	  o Confirmed or credible allegations of bribery, corruption, or facilitation payments.
	  o Supplier or affiliate appears on sanctions, debarment, or exclusion lists (e.g., OFAC, UN, EU, World Bank, or national government lists).
	  o 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).
	  o Supplier or affiliates are on a watch list and/or politically exposed persons (PEP) database.
	  o Supplier, owner, or key personnel subject to ongoing or unresolved ABC allegations, investigations, or convictions.
	  o Significant reputational concerns identified through media reviews, adverse reporting, or public scrutiny.
	  o High inherent exposure to bribery, sanctions, or fraud risk that cannot be adequately mitigated by contractual controls.
	  o Confirmation in media of fatalities, significant health and safety incidents, or systemic safety failures.
	    ▪ These must be communicated promptly to the relevant workstream.
	  o Media coverage indicating direct government interaction or exposure through intermediaries where corruption risk is elevated.
	• **Typical Scenarios:**
	  o Media allegations involving customs or clearing brokers facilitating imports.
	  o Agents or intermediaries referenced in media coverage relating to permits or interactions with government officials.
	  o Developers or contractors featured in adverse media regarding zoning, environmental approvals, or regulatory interactions.
	  o 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**:
	  o Media coverage of historical or resolved regulatory or legal issues (e.g., environmental fines, operational breaches).
	  o Adverse media suggesting reputational or governance concerns, but without ABC or sanctions implications.
	  o Indirect government exposure or subcontracting risks noted in reporting.
	  o Minimal regulatory or public-facing exposure.
	• **Typical Scenarios:**
	  o Contractors or developers with previously reported regulatory issues but no ongoing concerns.
	  o 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**:
	  o Clean background or immaterial findings (e.g., unrelated affiliate issues or general market coverage).
	  o Minor reputational issues or civil disputes unrelated to corruption or ethics.
	  o Media highlighting routine operational challenges, typical of the industry (e.g., supply chain delays, customer service issues) without ethical or legal implications.
	• **Typical Scenarios:**
	  o Professional or Technical Service Providers (e.g., engineering, IT, advisory) with clean or neutral media footprints.
	  o Regulated Utilities or Telecom Providers appearing only in routine market, operational, or regulatory filings with no reputational concerns.
	  o Large multinational financial institutions, custodians, or fund administrators.
	  o Suppliers providing standardized goods or routine administrative support services.
	  o 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**:
	  o 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).
	  o The third party maintains close personal or business ties with a government entity, government official, or their family members.
	  o The third party uses consultants, intermediaries, or agents (e.g., lobbyists) to win or retain government contracts or obtain licenses or approvals.
	  o 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.
	  o The third party is retained primarily to improve access to, or influence over, government contracts or approvals.
	  o 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**:
	  o The third party has minority ownership or participation in a joint venture or project involving a government or quasi-government entity.
	  o The third party engages occasionally with government or state-linked organizations, but activities are routine or procedural.
	  o 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**:
	  o Government interactions are limited to standardized, published, and non-negotiable fees (e.g., routine permits, licenses, filings, property taxes).
	  o The third party has no authority or opportunity to influence government decisions, officials, or regulatory outcomes.
	  o Engagements involve administrative compliance tasks only, where timelines and requirements are pre-defined.
	  o All interactions are routine, well-documented, and embedded in Brookfield's normal approval and procurement workflows.
	  o 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	

XIII. APPENDIX D

THIRD PARTY RISK ASSESSMENT

Third parties will be assigned a risk category ranking of "High", "Medium" and "Low" and this ranking will be recorded in the vendor record in the ERP application.

Business judgment is required when assigning third party risk categories. The proportion of High, Medium, and Low Risk classifications may vary based on supplier type, the nature and scope of services, the countries in which services are performed, and how the relationship is structured, including compensation terms, delegated authority, subcontracting arrangements, and the level of oversight. The rationale for the assigned rating should be documented and supported by appropriate analysis.

Note: The [Portfolio Company] operates in a highly regulated environment and, as part of our normal course of business, employees are expected to have interactions with government officials/entities. The [Portfolio Company] is also required to pay government entities for licenses and permits (with recurring and transparent fee schedules) to operate our power generating assets. Thus, while such government entities are not typically considered High Risk, the appropriate degree of diligence should still be completed.

For Medium Risk third parties, additional due diligence to consider, if applicable, such as:

- Conduct additional online research in risk and compliance databases (i.e., Dow Jones or similar) and international media, to identify risk-relevant information regarding the third party and/or its owner(s)/principal(s)
- Search global intelligence databases (e.g., Lexis Nexis, World Bank) covering government-prohibited persons/entities, politically exposed persons ("PEPs"), and persons/entities linked to corruption
- Obtain online "Business Information Report" from Dun & Bradstreet or equivalent resource to confirm corporate history and stability and to uncover any potential adverse media coverage
- Conduct a Google search for key words and terms
- Conduct additional information gathering to understand any red flags identified

For High Risk third parties, additional due diligence to consider, if applicable such as:

- The additional due diligence for Medium Risk third parties above
- Examine detailed business profile (e.g., who are the third party's other clients/contacts), request and review the third party's Code of Conduct, relevant internal policies, bank references, and references from other customers. (Seek assistance from the legal department or corporate risk management as needed).
- Review corporate records from business registries to identify shareholders, directors/officers, and other affiliated individuals
- Search relevant public local criminal records/law enforcement databases
- Search court records, to identify information indicating involvement in criminal/civil litigation, bankruptcy, or other disputes
- Search regulatory records to identify adverse/disciplinary actions taken by local and/or

central regulators

- Meeting with third party management

XIV. APPENDIX E

VENDOR ABC CATEGORIES

Third parties should be classified in the ERP system. The following categories should be used:

1. Joint venture partner
2. Employee
3. Customs agent or broker
4. Government entity/public official
5. Consultant
6. Lobbyist
7. Donation
8. Goods/parts provider
9. Landowner
10. Service provider
11. Construction contractor

[Note: Additional vendor categories that some Portfolio Companies choose to also include:

1. Telecom and communications
2. Utility
3. Real estate and rental properties
4. Legal services
5. Health benefits
6. Financial services]

XV. APPENDIX F

PROCESS FLOWCHART