

**Brookfield**

# Fighting Against Forced Labour and Child Labour in Supply Chains Report

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BROOKFIELD INFRASTRUCTURE PARTNERS & BROOKFIELD INFRASTRUCTURE CORPORATION

**MAY 2025**

# Fighting Against Forced Labour & Child Labour in Supply Chains Report

## Introduction

This report (the “Report”) has been prepared jointly by Brookfield Infrastructure Partners L.P. (“BIP”) (NYSE: BIP; TSX: BIP.UN) and Brookfield Infrastructure Corporation (“BIPC” and together with BIP, the “Reporting Entities”) (NYSE, TSX: BIPC) for the financial year ended December 31, 2024, pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”). In this Report, references to “we”, “us” or “our” refer to the Reporting Entities.

**BIP** was established on May 21, 2007 and spun off from Brookfield Corporation (“BN”), formerly known as Brookfield Asset Management Inc. on January 31, 2008, following a long history dating back to 1899, as a developer, owner, and operator of critical infrastructure assets. This tenure has defined our business culture, which we believe is a key differentiator and important contributor to our success.

**BIPC** is a subsidiary of BIP and, together with BIP, constitutes the flagship listed infrastructure entities of Brookfield Asset Management Ltd. (“BAM”), a global alternative asset manager with over \$1 trillion assets under management.

Many of the policies, practices, and approaches adopted by BIP and BIPC reflect those of BAM, which is itself a subsidiary of BN.

The following portfolio companies controlled by BIP and/or BIPC are subject to reporting requirements under the Act: Genesee & Wyoming Canada, Inc., Metergy Solutions Inc., Enercare Inc., Inter Pipeline Ltd., AECO Gas Storage Partnership and NorthRiver Midstream Holdings Inc. These companies operate in different industries and in accordance with their own policies. Therefore, each such portfolio company will be filing its own report under the Act on its own behalf and on behalf of, or jointly with, any of its applicable subsidiaries.

A subsidiary of BIP, BPIH Pty Ltd., is subject to reporting requirements under The Commonwealth Modern Slavery Act, 2018 (“MSA Australia”) and files its own report under the MSA Australia.

Services provided by the Reporting Entities, include:

- Asset management; and
- Group holding entities and related activities.

## Commitment

The Reporting Entities are committed to having a positive impact on the environment and the communities in which we operate.

We continue to seek to align our business practices with frameworks for responsible investing. BN and BAM are signatories to the United Nations-supported Principles for Responsible Investment (“PRI”). Through our affiliation with BAM, PRI forms part of our ongoing commitment to responsible investment and sustainability 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 prevention of human rights violations, including but not limited to:

- operating with robust health and safety practices to support the goal of achieving zero serious safety incidents;
- striving to ensure that the interests, safety and well-being of the communities in which we operate are integrated into our business decisions;
- where applicable, expecting our vendors to respect human rights and maintain processes aimed at identifying and preventing adverse human rights impacts that could arise from their or their suppliers’ operations; and
- acting in ways aimed at:
  - a. the elimination of discrimination in employment;
  - b. the prohibition of child and forced labor; and
- the eradication of harassment and physical or mental abuse in the workplace.

We are cognizant that the risks of human rights violations, human trafficking, forced labour and child labour are complex and evolving, and we will continue to work on addressing them. Our approach and processes are periodically reviewed and, where appropriate, updated as necessary to reflect changes in circumstances and practice.





Our Business Activities

Assessing Forced Labour and Child Labour Risk

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

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 Reporting Entities’ businesses generally fall under the below categories:

- ♦ **Outsourcers:** Where a business activity or professional service is outsourced to another organization.
- ♦ **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, human resources, accounting, training, tax, audit, banking and education.
- ♦ **Property and Facilities Maintenance:** Includes building repairs and maintenance, cleaning, security and utilities, and public services.
- ♦ **Hotels and Lodging:** Travel, including accommodation, is generally booked through a Brookfield approved travel management company.

The Reporting Entities continuously strive to enhance our contracting practices because we believe that adequately compensated and trained workers, operating in fair working conditions deliver high-quality products and services. We utilize indices and resources, as appropriate and in our absolute discretion, as a basis to identify countries or other factors that may have a higher risk of forced labour and child labour violations. We believe that the risk of forced labour and child labour within the majority of our third-party vendors is low. This assessment is based on the jurisdictions, the regulated industries in which they operate and the skill of the professionals providing such services. However, we acknowledge that, to a lesser extent, we engage with suppliers who may be considered higher risk in terms of forced labour and child labour. These may include 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 consider this risk where appropriate and possible. We currently have limited visibility of these extended supply chains, excluding projects where subcontractors or materials require our approval.

2. **Employees:** The employees working in the Reporting Entities’ business are mainly professional and administrative staff. Through BAM, the Reporting Entities have human resources policies, procedures and processes in place designed to protect against forced labour, child labour and human trafficking in the employee population throughout the Reporting Entities’ business, including the Human Rights and Anti-Modern Slavery Policy (discussed further below). These include:

- Employment conditions;
- Processes for reporting and resolving staff concerns and grievances;
- Non-discriminatory hiring practices;

- Employment screening (including work eligibility checks); and
- Appropriate workplace behavior.

Through our global Positive Work Environment Policy, all employees are responsible for creating a respectful environment and are required to identify and report workplace discrimination, violence and harassment as it occurs. Employees of certain Reporting Entities’ businesses receive training on the global Positive Work Environment Policy. Our employees are required to certify annually that they have read and complied with this policy.

Based on the above, we consider that there is a low risk of forced labour and child labour within the employee population of the Reporting Entities.

3. **Business Operations – Investments:** As part of investment due diligence, we seek to assess sustainability-related risks and opportunities and factor them into the overall investment decision. This includes leveraging industry guidance to identify sustainability factors most likely to materially impact the financial condition or operating performance of companies in a sector. As part of our Sustainability Due Diligence Protocol, we provide specific guidance to investment teams on assessing climate risks, bribery and corruption, cybersecurity, health and safety, human rights, forced labour and child labour risks. We also have specific processes aimed at identifying human rights and forced labour and child labour as part of due diligence for new investments, which include risk assessments, mitigation, and training and governance. Investment teams are required to maintain records of assessed risks and, where appropriate, we perform deeper due diligence, working with internal experts and third-party experts as needed.

Management of Forced Labour and Child Labour 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. We are committed to policies aimed at maintaining a workplace free of discrimination, violence and harassment, and we expect our staff to act in a way which promotes a positive work environment. Our approach to addressing forced labour and child labour 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 (together, the “Policy Framework”) include, but are not limited to:

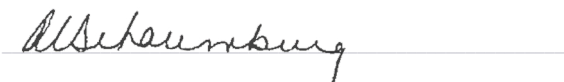
- ♦ **Human Rights and Anti-Modern Slavery Policy:** This policy sets out our approach to respecting fundamental human rights. It aims to codify the manner in which we seek to minimize the risk of forced labour and child labour within our business and supply chain.
- ♦ **Code of Business Conduct and Ethics:** The Reporting Entities’ Code sets out the expected conduct of our directors, officers and employees in relation to honesty, integrity and compliance with all legal and regulatory requirements. Employees, directors, officers and any temporary workers who are subject to the Reporting Entities’ Code are required to certify annually that they have read and complied with the Code and the protocols incorporated therein.
- ♦ **Whistleblowing Policy:** The Reporting Entities are committed to conducting business with honesty and integrity and staff are expected to maintain high standards. This policy clearly sets out the expectations of reporting and responsibilities, and outlines whistleblowing procedures addressing how to raise a concern, confidentiality, as well as

<p>remediation, external disclosures and our zero tolerance for retaliation or malicious acts.</p> <p>♦ <b>Vendor Management Procedures:</b> In connection with any vendor engagement, employees are required to follow, as applicable, the policies and procedures of BAM, including those in relation to forced labour and child labour.</p> <p>We expect providers of goods or services to the Reporting Entities to adhere to ethics and compliance commitments similar to those set out in BAM’s Vendor Code of Conduct (“<b>Vendor Code</b>”) and to the extent applicable, to have the necessary policies and procedures in place to support such commitments within their business and supply chain. Where appropriate, vendor contracts include acceptance of the Vendor Code or reference to equivalent vendor policies.</p> <p>The Reporting Entities’ approach to addressing high-risk, third-party vendors includes conducting enhanced due diligence checks, the use of specific contract clauses in legal agreements, and, where appropriate, requiring vendors to evidence forced labour and child labour mitigation strategies.</p> <p>♦ <b>Sustainability Due Diligence Protocol:</b> As part of our Sustainability Due Diligence Protocol, we provide specific guidance to investment teams on assessing climate change, bribery and corruption, cybersecurity, health and safety, human rights, forced labour and child labour risks. Where warranted, we perform deeper due diligence, working with internal and third-party experts as appropriate.</p> <p>We have made comprehensive updates to our Sustainability Due Diligence Protocol in 2024, incorporating feedback from various internal and external stakeholders to provide specific guidance to investment teams on assessing material risks across</p>	<p>our controlled and non-controlled investments. The human rights and modern slavery specific annex to our Sustainability Due Diligence Protocol intends to support our investment teams in identifying the nature and extent of exposure to forced labour and child labour violations across our business, including supply chains, and the steps necessary to prevent or mitigate any such risks identified.</p> <p>♦ <b>Financial Crime Policies:</b> 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 forced labour and child labour).</p> <p>Forced labour, child labour and financial crime are closely linked, as proceeds from human trafficking, forced labour and child labour need to be ‘cleaned’ before entering the mainstream economy. Therefore, preventing the onboarding of those involved in financial crime, identifying suspicious or criminal activity and making reports to the relevant authorities not only supports the fight against money laundering, but also, by association, the fight against forced labour and child labour.</p> <p>♦ <b>Positive Work Environment Policy:</b> This outlines our commitment to providing a workplace free of discrimination, violence and harassment and summarizes the responsibilities of employees, directors, officers and any temporary workers to which the policy applies 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.</p>	<p>Our Policy Framework is reviewed periodically and updated as necessary.</p> <p><b>2. Training:</b> We place importance on creating a culture that promotes high standards of ethical behaviour as well as the protection of human rights. We continue to raise awareness and commit to providing human rights training, which includes the topic of forced labour and child labour, to new employees who participate in BAM’s investment advisory business and those in high-risk roles as part of the onboarding process, with ongoing training provided as necessary. Additional training relevant to applicable regions and roles, particularly in higher-risk functions such as procurement is provided. As it relates to sustainability, we encourage our portfolio companies to organize training for relevant staff.</p> <p><b>3. Risk Assessment:</b> Risk assessments are important to the Reporting Entities’ efforts to identify and prevent human rights violations within our business and supply chain. The forced labour and child labour risk for each of the Reporting Entities varies based on the nature of its business operations. Our risk-based approach enables the Reporting Entities to focus efforts where most required.</p> <p><b>4. Remediation:</b> We have not found any evidence of forced labour or child labour. Where possible, we will try to use our position and leverage to address any issues that we discover.</p> <p><b>5. Whistleblowing Hotline:</b> Through BAM, the Reporting Entities maintain a reporting hotline (“Hotline”) for employees, vendors, partners and other interested parties to anonymously report, among other things, any matters relating to suspected unethical, illegal, unsafe or other unwanted behaviors. Forced labour and child labour, as well as human trafficking issues are reportable on the Hotline. The Hotline is managed by an independent third party and is accessible 24/7 by telephone (toll free) or by</p>	<p>submitting an anonymous report online. The Hotline is available in multiple languages to mitigate any language barriers and to provide information to those intending to report.</p> <p><b>6. Measure of Effectiveness:</b> The Reporting Entities acknowledge that forced labour, child labour and human trafficking are possible risks within our business operations and supply chain. We undertake various steps to address these risks in various regions across our business, including reviewing our policies and business practices to ensure they reflect our commitment to:</p> <ul style="list-style-type: none"> <li>Implementing and utilizing effective systems and controls designed to reduce the risk of forced labour and child labour in our business and supply chains; and</li> <li>Transparency through our disclosure obligations.</li> </ul> <p>We monitor and assess the effectiveness of our forced labour and child labour policy framework through:</p> <ul style="list-style-type: none"> <li>Regular engagement and feedback from key stakeholders, including through active promotion of our reporting Hotline; and</li> <li>Operational risk and mitigation plan reporting to the relevant boards and senior executives.</li> </ul>
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# Approval

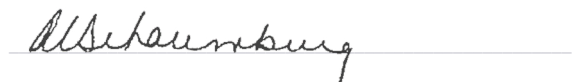
This Report has been approved by the board of directors of BIP's managing general partner and the board of directors of BIPC on April 29, 2025, in accordance with Section 11(4)(b)(i) of the Act.

## Brookfield Infrastructure Partners L.P. and Brookfield Infrastructure Corporation



Anne Schaumburg  
Chair  
May 21, 2025.

*I have the authority to bind Brookfield Infrastructure Partners L.P.*



Anne Schaumburg  
Chair  
May 21, 2025.

*I have the authority to bind Brookfield Infrastructure Corporation*