

## Policy Summary

### Securities Trading Policy

Directors and employees of the Brookfield Australia Investments Group (the Brookfield Group), including their immediate family or any entity for which they control investment decisions, must ensure that any trading in Brookfield securities is undertaken within the framework set out in the Securities Trading Policy.

No director, employee or contractor of the Brookfield Group or any of its controlled entities may deal in financial products issued by a Brookfield entity for short term gain or when in possession of unpublished, price sensitive information. With limited exceptions certain nominated employees are not permitted to trade in Brookfield securities in the lead up to half and full year results. This restriction applies whether or not the individuals are in possession of inside information.

### Continuous Disclosure Policy

The Brookfield Group is committed to the promotion of investor confidence, by providing full and timely information to the market about fund activities, and compliance with the continuous disclosure requirements of the Corporations Act 2001 and the ASX Listing Rules.

The Brookfield Group has appointed a Continuous Disclosure Officer who will determine what information must be disclosed via an ASX release.

Brookfield Licensees will immediately notify the market of any information or any major development related to the businesses or financial condition of a Brookfield Security that a reasonable person would expect to have a material effect on, or lead to a substantial movement in, the price or value of units in that security. This will be notified to the market by way of an announcement to the ASX. No Brookfield employee may release material price sensitive information to any person until it has given the information to the ASX and has received an acknowledgement that the ASX has released the information to the market. Following acknowledgement from the ASX all information disclosed to the market will be posted to the Brookfield Group website. Information about unlisted Brookfield securities will be announced via the Brookfield Group website or direct mailing to unitholders as appropriate.

All recent company information is posted to the website including:

- Annual reports
- Half yearly reports
- Announcement/releases to the ASX

### Conflicts of Interest and Related Party Dealings Policy

The Brookfield Group is dedicated to ensuring it conducts its investment management business in accordance with all applicable laws and regulations. As a manager of property and property related assets through a range of investment vehicles, and on behalf of retail and wholesale customers, there is potential for entities within Brookfield to be in a position of conflict when dealing with these clients.

Conflicts occur when some or all of the interests of our clients are inconsistent with some or all of the interests of an Australian Financial Services Licence holder, or their representative providing the financial service to our client.

The Australian Financial Services Licensees have adopted a Conflicts of Interest and related Party Dealings Policy which documents the measures that have been put in place to manage a range of matters that may result in actual or perceived conflicts of interest. Whether a client is retail or wholesale is of no relevance to the obligation of managing conflicts of interest. Licensees must act efficiently, honestly and fairly in relation to all clients. However the nature of a licensee's clients may have a bearing on how a licensee deals with the conflict.

### **Risk Management Strategy**

The Australian Financial Services Licensees have adopted a risk management framework based on ISO 31000 Risk Management. This framework as set out in our Risk Management Strategy sets common standards for the identification, measurement, management and reporting of risk in regards to financial services activity. The major risks are strategic, financial reporting, operational risk and compliance risk.