

# **Brookfield Oaktree Holdings, LLC (“BOH”) Frequently Asked Tax Questions**

The information provided below is for your general guidance and is not intended to be (and cannot be relied upon as) tax advice. Unitholders are strongly urged to consult with their own tax advisors with regard to the U.S. federal income tax consequences of holding our units and the related tax reporting requirements. The information provided below only considers selected U.S. federal income tax consequences and does not consider all U.S. federal income tax consequences or state, non-U.S. or any other tax consequences that may be applicable to a particular unitholder. In particular, some categories of unitholders, such as non-U.S. unitholders, tax-exempt unitholders, mutual funds, banks, thrifts, insurance companies, persons liable for the alternative minimum tax, dealers and other investors that do not own their units as capital assets, may be subject to special rules not described herein. Please consult your tax advisor as to the appropriate treatment of any tax items.

## **1. Why do I receive a Schedule K-1 rather than a Form 1099?**

Although BOH is publicly traded, it is treated as a partnership for U.S. federal income tax purposes (as opposed to a corporation), and its unitholders are treated as partners. Partnerships such as BOH are generally not subject to federal or state income tax but are instead required to issue a Schedule K-1 to each unitholder to report his or her allocable share of BOH's income, gains, losses, deductions and tax credits (“Tax Items”). You are required to report your share of BOH's Tax Items as reflected on your Schedule K-1 on your federal income tax return for the relevant reporting period. Since BOH is not a corporation, we do not issue Form 1099s to BOH unitholders.

## **2. Will I receive a Schedule K-1 if I purchased BOH's Series A Preferred Units and/or Series B Preferred Units in 2025 (collectively, “Preferred Units”)?**

Yes. If you purchased BOH's Preferred Units, BOH is required to allocate gross ordinary income to you equal to your proportionate share of each gross ordinary income line item. Gross ordinary income is BOH's gross income excluding any gross income attributable to sale or exchange of “capital assets.” More specifically, the gross ordinary income items are primarily comprised of interest and dividend income. As a unitholder of the Preferred Units, you are required to report your share of BOH's gross income as reflected on your Schedule K-1 on your federal income tax return for the relevant reporting period.

## **3. Are the cash distributions I received from BOH taxable?**

In general, cash distributions received from BOH should not be taxable to the extent they do not exceed your adjusted tax basis in the underlying BOH units. However, if you received a distribution that exceeds your adjusted tax basis, you should consult with your tax advisor as the distribution may be taxable. If you are a non-U.S. unitholder, please see question 11 below.

## **4. It looks like my broker booked the distribution as a dividend. Does this affect the tax treatment of the distribution?**

No. Brokers sometime identify the distribution as a dividend for their own reporting purposes. This will not affect the Schedule K-1 reporting and the tax treatment of the distribution. Technically, we are not paying out a dividend nor are we

paying interest income. You are receiving a distribution from a partnership, which is treated as specified in question 3 above.

**5. Will every unitholder receive a Schedule K-1 regardless of the amount of time they held their units?**

Yes. Regardless of the amount of time a unitholder held their units, each unitholder will receive a Schedule K-1 reflecting their allocable share (if any) of BOH's Tax Items for the period during which such units were owned.

**6. When are BOH Schedule K-1s available?**

We will provide final Schedule K-1 tax packages electronically by the end of March following the tax year ended December 31. Access to the TaxWeb secure Schedule K-1 website (<https://www.taxpackagesupport.com/oaktree>) is available upon release of the final Schedule K-1 tax packages, and customer support is available by contacting the Oaktree Tax Package Support Service at (866) 709-8178. Hard copies of the final Schedule K-1 tax packages will also be mailed following the release at the end of March unless the unitholder has opted for paperless delivery via the TaxWeb secure Schedule K-1 website.

**7. What should I do if I believe the information on my Schedule K-1 is incorrect?**

Your Schedule K-1 is prepared based upon information (name, social security number/EIN, address, partner type, number of units owned, purchase and sale dates, etc.) provided by your bank or broker. Changes to this information should first be requested by contacting your bank or broker directly. Once your bank or broker sends the corrected information, the Oaktree Tax Package Support Service will issue a revised Schedule K-1. You may call the Oaktree Tax Package Support Service at (866) 709-8178 to confirm the status of your request.

**8. Does BOH maintain the tax basis in my units?**

No. Each unitholder should maintain their own individual tax basis in BOH units. Please consult your tax advisor.

**9. If the trading price of BOH units dropped since I purchased those units, why do I owe tax?**

As a partner in a partnership, you are taxed on your allocable share of BOH's Tax Items, irrespective of the trading price of BOH units. See also questions 1 and 5.

**10. What are the U.S. tax implications of a sale or exchange of BOH units?**

Please consult your tax advisor. If you disposed of your BOH units during 2025, your Schedule K-1 will include a Unified Basis Sales Schedule to assist you in the calculation of your gain or loss as a result of your disposition(s). Please see the footnote disclosures in the Unified Basis Sales Schedule attached to your Schedule K-1. Generally, you will recognize gain or loss on a sale of BOH units equal to the difference, if any, between the amount realized and your adjusted tax basis in the units sold. Except to the extent that Code Section 751 applies to characterize a portion of your gain or loss as ordinary, the character of the resulting gain or loss recognized by you will generally be long-term capital gain or loss (to the extent attributable to units held by you for more than one year), or short-term capital gain or loss (to the extent attributable to units held by you for one year or less).

As it relates to the applicability of withholding under IRC Section 1446(f) beginning January 1, 2025, Brookfield Oaktree Holdings, LLC ("BOH") is not engaged in a U.S. trade or business and therefore meets the exception to withholding provided for in Treasury Regulation 1.1446(f)-4.

For tax years beginning in 2013, Code Section 1411 imposes a 3.8% surtax on certain investment income earned by individuals, trusts and estates. Your share of taxable income reported on your Schedule K-1 and any gain on the sale of BOH units may be subject to the surtax. Please consult your tax advisor concerning the impact of Code Section 1411 to you.

**11. I am a non-U.S. unitholder who received a distribution. Are my cash distributions subject to U.S. withholding tax?**

The portion of a distribution to a non-U.S. unitholder that is attributable to U.S. source income may be subject to U.S. withholding tax. For example, the portion of a distribution to a non-U.S. unitholder attributable to U.S. source dividends is subject to U.S. withholding tax. The withholding tax rate on U.S. source dividends is currently 30% unless a lower treaty rate applies. For each quarterly distribution, the amount of U.S. source dividends and any other types of U.S. source income subject to withholding are reported on a Qualified Notice to transfer agents and other nominees responsible for withholding. Copies of these notices for the Preferred Units are available in the Unitholders area of the Oaktree website in the Distributions section (<https://www.brookfieldoaktreeholdings.com/unit-information/distributions>).

**12. For non-U.S. unitholders, am I correct in assuming that the portion of the distribution reported as dividend income paid by a U.S. corporation on the Qualified Notice is treated similarly to dividends paid by a U.S. corporation for the purposes of withholding?**

Yes. The portion of the distribution reported as dividend income paid by a U.S. corporation on the Qualified Notice is treated similarly to dividends paid by a U.S. corporation for the purposes of withholding.

**13. I am a non-U.S. unitholder. The U.S. source dividends and corresponding withholding reported to me on Form 1042-S do not match the U.S. source dividends allocated to me on my Schedule K-1. Which report is correct?**

The Schedule K-1 reports your final allocation of U.S. source dividends for the year and, therefore, includes the final, correct amount of U.S. source dividends allocated to you. This may not correspond to the amounts reported on your Form 1042-S since the documentation our withholding agents receive may not properly reflect the identities of the partners at any particular time when the withholding occurs. While every effort is made to minimize these differences, there can be no guarantee that the Schedule K-1 reporting will match the Form 1042-S reporting, particularly in circumstances where units are purchased or sold during the year.

**14. I am a non-U.S. unitholder. Did BOH report any Effectively Connected Income (“ECI”) or Foreign Investment in Real Property Tax Act (“FIRPTA”) income in 2025?**

BOH did not report any ECI or FIRPTA income treated as ECI in 2025, but may report ECI and/or FIRPTA income in future years. We will disclose any such ECI or FIRPTA income on the Schedule K-1s for any such years. Additionally, if BOH is treated as being engaged in a U.S. trade or business, any gain recognized by a non-U.S. unitholder on the sale or exchange of BOH units that is attributable to assets that if sold would produce income that would be effectively connected with such U.S. trade or business will be treated for U.S. federal income tax purposes as ECI, and hence, such non-U.S. unitholders would be subject to U.S. federal income tax on the sale or exchange of such BOH units. Under recently enacted tax reform legislation, the transferee of an interest in BOH must withhold 10% of the amount realized unless, BOH sold all of its assets at fair market value, the amount of net effectively connected gain would be less than 10% of the total gain (otherwise, if no other exceptions applied, BOH would be required to withhold from future distributions to the transferee if the transferee fails to so withhold).

**15. Is BOH a Passive Foreign Investment Company (“PFIC”)?**

BOH is not a PFIC. BOH is a Delaware limited liability company that is treated as a partnership for U.S. federal income tax purposes. However, BOH holds indirect interests in numerous entities that are treated as PFICs for U.S. tax purposes. BOH has made qualified electing fund (“QEF”) elections with respect to such PFIC interests. As a result, any such PFIC activity has been included in the Tax Items reported to you on your Schedule K-3 (see question 21).

**16. The instructions that accompany the Schedule K-1 have a note under Line 20, Code V that states that a partner is required to notify the partnership of its tax-exempt status. What is the procedure for doing so?**

Partners may communicate their tax-exempt status by providing a Form W-9 to their broker indicating that the entity is tax-exempt. In addition, unitholders may call the Oaktree Tax Package Support number at (866) 709-8178 and ask that their Schedule K-1 indicate tax-exempt for the Partner Type (Part II, I1 on the Schedule K-1).

**17. I am a tax-exempt partner. Did BOH report any Unrelated Business Taxable Income (“UBTI”) in 2025?**

Yes. BOH reported UBTI in 2025 and may report UBTI in future years. If we do report UBTI in any year, we will disclose it on the Schedule K-1s for such year.

**18. Why did I receive a Schedule K-1 from my retirement plan’s account?**

Federal tax law requires that a Schedule K-1 be sent to every unitholder that held BOH units during the tax year. If your units are held in a tax-advantaged retirement account (Roth IRA, Traditional IRA, 401(k), etc.), amounts reported on the Schedule K-1 are not separately reportable on your personal income tax return. See question 19 below for more information.

**19. Are there differing tax consequences for owners of BOH units if they are held in a tax-advantaged retirement account such as a ROTH IRA or a 401(k) account? Do I need to follow any special procedures?**

Please consult your tax advisor regarding whether or not your tax-advantaged retirement account can hold BOH units. If you choose to hold BOH units in your tax-advantaged retirement account, please coordinate with your account custodian on any special procedures which may need to be followed for investing in BOH units. A holder of BOH units that is tax-exempt (such as a Traditional IRA, ROTH IRA or 401(k) account) may nevertheless be subject to tax to the extent that its allocable share of income includes any UBTI. Current tax laws require IRAs and other tax-exempt entities with more than \$1,000 of gross UBTI to file a U.S. tax return (Form 990-T). This form may be filed by the custodian of your account. The account will only owe taxes if its UBTI exceeds \$1,000. You should consult the custodian of your account to determine who is responsible for filing the appropriate tax forms (if required).

**20. Does my investment in BOH units subject me to U.S. state tax filing requirements?**

Historically, BOH has not generated state source income and therefore partners have not been subjected to any state tax filing requirements to date on account of their BOH units. In 2025, BOH earned investment income (interest, dividends and capital gains), which is generally sourced to a unitholder’s state of residence. Accordingly, you should not be subject to filing requirements in other states as a result of your investment in BOH. However, given the nature of our investments, we may report state source income in the future and therefore cannot make any representation that we will not generate state source income. If we do report any state source income in the future, we will disclose it on the Schedule K-1 for such future tax year.

**21. Will I receive a Schedule K-3?**

For tax years beginning in 2021, partnerships are required to provide Schedule K-3 to report items of international tax relevance from the operation of a partnership previously reported on Schedule K-1. Schedule K-3 replaces, supplements, and clarifies the former line 16, Foreign Transactions, in Part III of Schedule K-1 (Form 1065). Schedule K-3 also replaces, supplements, and clarifies the reporting of certain amounts formerly reported on line 20, Other information, in Part III of Schedule K-1. Should you require a Schedule K-3, it will be available at a later date.

**22. Has the partnership provided corporate alternative minimum tax (CAMT) information in this tax package?**

The partnership has not provided corporate alternative minimum tax (CAMT) information on Box 20AX on the assumption your units are not held directly or indirectly by an applicable corporation (within the meaning of section 59(k) of the Internal Revenue Code). In general, the CAMT applies to corporations for a year in which average adjusted financial statement income (AFSI) for the three taxable years ending with such year exceeds \$1 billion (members of foreign parented multinational groups must apply an additional \$100 million test). Few if any corporations that are public unitholders are expected to be subject to CAMT. No unitholders that are individuals will require CAMT information. If you require information from the partnership to calculate your distributive share of AFSI in order to determine your liability for CAMT or to report your AFSI to a person requesting information from you, please contact Tax Package Support Service at (866) 709-8178.

As of March 19, 2026