



Responsible
contracting
statement

March 2024

Purpose

Manulife Investment Management¹ (Manulife IM, we, or us) recognizes the value that contractors bring to the operation of our investments, as well as the importance of working with responsible partners to maintain sustainable operations. The complexity of supply chains and the diverse nature of our business activities and geographies in which we operate translate into diverse contracting needs. This statement² outlines our commitment to responsible contracting practices, in line with evolving regulatory frameworks and best practices, for Manulife IM's comprehensive capabilities.³

This statement demonstrates our differentiated approach to responsible contracting, based on the asset classes and the control we have over procurement activities in our own operations, encompassing the procurement activities we undertake for our directly managed and third-party operated assets and in our portfolio companies.⁴

Our approach to responsible contracting

Our fiduciary duty remains at the core of our approach to contracting. At all times, assets shall be operated so as to seek to enhance the value of investments for the benefit of Manulife IM's clients. Portfolio managers and investment teams are charged with exercising the care, skill, prudence, and diligence appropriate to their respective tasks.

In alignment with this duty—to manage financial and reputational risk and create long-term value—responsible contracting requires both parties, the buyer and the contractor/supplier, to take proactive and ongoing measures and have a shared responsibility in allocating risks and rights and obligations, to respect human rights, and to manage adverse impacts throughout a contract. Responsible contracting builds on the premise that all Manulife IM affiliated contractors and their subcontractors, such as property managers and construction/plant managers, are obligated to comply with applicable federal, state, and local laws, regulations, and ordinances, and on Manulife IM's expectation that its human rights standards are cascaded to the contractors' and their subcontractors' own businesses.

1 Manulife Investment Management is the unified global brand for Manulife's Global Wealth and Asset Management (GWAM) business, which serves individual investors and institutional clients in three businesses: retirement, retail, and institutional asset management. **2** This responsible contracting statement aligns with the efforts of Manulife Financial Corporation (Manulife), our parent company, to build a responsible and diverse supply chain, and follows the principles described in Manulife's [Global Human Rights Statement](#), [Global Procurement Policy](#), [Code of Business Conduct and Ethics](#) and [Vendor Code of Conduct](#), all of which reference Manulife's expectations regarding ethical business practices and human rights. **3** This responsible contracting approach applies to contracts entered into by or on behalf of Manulife IM. Please note that this statement is solely for guidance purposes. Contracts existing at the time of an investment or at the time this statement goes into effect shall not be subject to this statement until they are evaluated for renewal. Voluntary compliance with the spirit of the statement is encouraged. However, note that the preceding paragraphs shall not prevent Manulife IM from making any investment, including follow-on investments, that it would otherwise be permitted to make under a client account's governing documents, or entering into agreements with contractors on an exclusive or preferred basis (for example, on a non-competitive bid basis) that potentially offer strategic value. **4** Our leverage in procurement decisions may differ in the assets we directly control and operate vs. those operated by third parties vs. in our portfolio companies. This statement is for guidance purposes for Manulife and Manulife IM employees to support the implementation or promotion of responsible contracting principles.

Manulife IM applies the following principles in our real assets that we directly control and operate to continuously support the implementation of responsible contracting practices, including those that are subject to specialized procurement, in the (i) identification of contractors/suppliers and negotiation of a contract; (ii) execution, renewal, and modification of a contract; and (iii) closure/termination of a contract:

We conduct responsibility screening

We identify salient human rights issues by asset class and sector and apply this insight as part of our contracting and sustainable investing due diligence processes.

We build our contractors' capacity

Our commitment to human rights is clearly indicated in our [Vendor Code of Conduct \(VCOC\)](#), which is publicly available to all of our present and potential contractors and is shared with our contractors when onboarding. Manulife's global vendor management program reviews performance and policy alignment for a sample of vendors every year. Additionally, Manulife IM has initiatives specific to some asset classes and provides additional guidance and/or training on human rights to a number of our contractors.

We may incorporate human rights considerations into contract terms

We may work with our selected contractors to agree on contract terms, including timelines and budgets to avoid human rights abuses. Our contractors expressly agree to comply with the terms of our VCOC when the contract signature occurs.

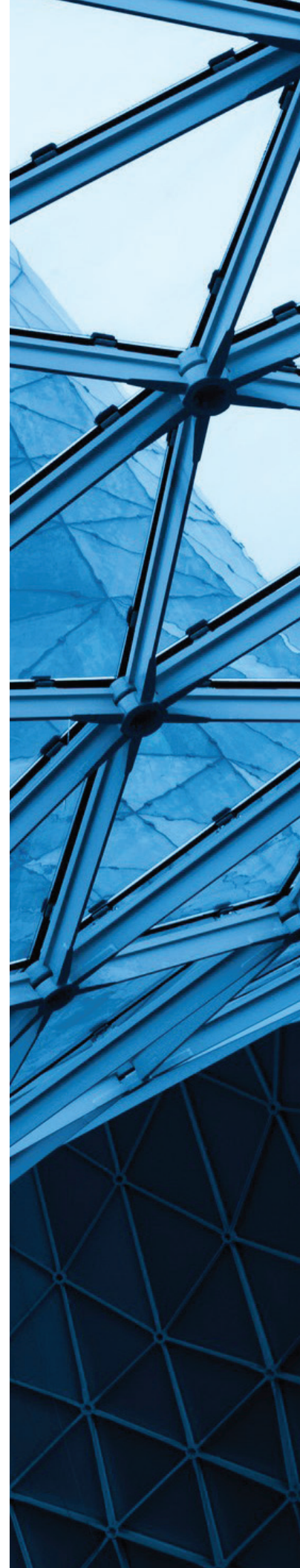
We take part in remediating adverse impacts

Our [Code of Business Conduct and Ethics](#) provides information about our toll-free hotline and email to report unethical, unprofessional, illegal, fraudulent, or other questionable behavior, including concerns and grievances of affected or potentially affected stakeholders. In the event an adverse impact occurs, we work with our contractor(s) and/or other buyers to proportionally remediate or mitigate any adverse impact and study the root cause to avoid future harm, where appropriate.

In addition to the principles listed above, there are other steps we may take to create further value, when feasible:

Local procurement and supplier diversity

While upholding our duty of care and prudence, Manulife IM can prefer contracts from local and diverse suppliers to build long-term relationships with suppliers that are familiar with local sensitivities in the communities in which we operate.



Competitive bidding

Manulife IM seeks to promote a competitive bidding process in selecting third-party contractors to provide certain construction, maintenance, operations, and other business-related services. A competitive bidding process encourages fair competition and actively seeks bids from all qualified sources that can demonstrate relevant experience with projects of a similar scale and nature. This shall not apply in cases where Manulife IM (including its affiliates) provides such services directly. Bid reviews shall include consideration of duty of care, prudence, and competitive risk-adjusted returns. Price is only one factor, with others including worker training, experience, expertise, reputation for honesty and ethical conduct, integrity, timeliness, availability, dependability, quality of services, soundness of work methods and approach, technological capability, worker protections, safety record, insurance, and references. These criteria aren't listed in order of importance nor is the list complete. Manulife IM may add or delete factors, change weightings, or decline to consider one or more factors.

We acknowledge that we don't always have control over procurement activities. In our real assets that we don't directly control and operate, Manulife IM may communicate our responsible contracting approach to our operating company managers and use reasonable efforts to encourage alignment with that approach. We're working to improve our ability to monitor our third-party managers to ensure that responsible contracting practices are in place and are implemented. Manulife IM investment teams may also use relevant elements of these principles when engaging with their portfolio companies and issuers.

Collaborations

We place a strong emphasis on collaboration with peers, industry associations, civil society organizations, and other groups that seek fairer conditions and standards for workers everywhere. We'll collaborate with other industry stakeholders when we believe that an initiative is in the long-term interests of both our clients and the investment industry.



Investing involves risks, including the potential loss of principal. Financial markets are volatile and can fluctuate significantly in response to company, industry, political, regulatory, market, or economic developments. These risks are magnified for investments made in emerging markets. Currency risk is the risk that fluctuations in exchange rates may adversely affect the value of a portfolio's investments.

The information provided does not take into account the suitability, investment objectives, financial situation, or particular needs of any specific person. You should consider the suitability of any type of investment for your circumstances and, if necessary, seek professional advice.

This material is intended for the exclusive use of recipients in jurisdictions who are allowed to receive the material under their applicable law. The opinions expressed are those of the author(s) and are subject to change without notice. Our investment teams may hold different views and make different investment decisions. These opinions may not necessarily reflect the views of Manulife Investment Management or its affiliates. The information and/or analysis contained in this material has been compiled or arrived at from sources believed to be reliable, but Manulife Investment Management does not make any representation as to their accuracy, correctness, usefulness, or completeness and does not accept liability for any loss arising from the use of the information and/or analysis contained. The information in this material may contain projections or other forward-looking statements regarding future events, targets, management discipline, or other expectations, and is only current as of the date indicated. The information in this document, including statements concerning financial market trends, are based on current market conditions, which will fluctuate and may be superseded by subsequent market events or for other reasons. Manulife Investment Management disclaims any responsibility to update such information.

Neither Manulife Investment Management or its affiliates, nor any of their directors, officers or employees shall assume any liability or responsibility for any direct or indirect loss or damage or any other consequence of any person acting or not acting in reliance on the information contained here. All overviews and commentary are intended to be general in nature and for current interest. While helpful, these overviews are no substitute for professional tax, investment or legal advice. Clients should seek professional advice for their particular situation. Neither Manulife, Manulife Investment Management, nor any of their affiliates or representatives is providing tax, investment or legal advice. This material was prepared solely for informational purposes, does not constitute a recommendation, professional advice, an offer or an invitation by or on behalf of Manulife Investment Management to any person to buy or sell any security or adopt any investment strategy, and is no indication of trading intent in any fund or account managed by Manulife Investment Management. No investment strategy or risk management technique can guarantee returns or eliminate risk in any market environment. Diversification or asset allocation does not guarantee a profit or protect against the risk of loss in any market. Unless otherwise specified, all data is sourced from Manulife Investment Management. Past performance does not guarantee future results.

Manulife Investment Management

Manulife Investment Management is the brand for the global wealth and asset management segment of Manulife Financial Corporation. Our mission is to make decisions easier and lives better by empowering investors for a better tomorrow. Serving more than 17 million individuals, institutions, and retirement plan members, we believe our global reach, complementary businesses, and the strength of our parent company position us to help investors capitalize on today's emerging global trends. We provide our clients access to public and private investment solutions across equities, fixed income, multi-asset, alternative, and sustainability-linked strategies, such as natural capital, to help them make more informed financial decisions and achieve their investment objectives. Not all offerings are available in all jurisdictions. For additional information, please visit manulifeim.com.

This material has not been reviewed by, is not registered with any securities or other regulatory authority, and may, where appropriate, be distributed by the following Manulife entities in their respective jurisdictions. Additional information about Manulife Investment Management may be found at manulifeim.com/institutional

Australia: Manulife Investment Management Timberland and Agriculture (Australasia) Pty Ltd, Manulife Investment Management (Hong Kong) Limited. **Canada:** Manulife Investment Management Limited, Manulife Investment Management Distributors Inc., Manulife Investment Management (North America) Limited, Manulife Investment Management Private Markets (Canada) Corp. **Mainland China:** Manulife Overseas Investment Fund Management (Shanghai) Limited Company. European Economic Area Manulife Investment Management (Ireland) Ltd. which is authorised and regulated by the Central Bank of Ireland **Hong Kong:** Manulife Investment Management (Hong Kong) Limited. **Indonesia:** PT Manulife Aset Manajemen Indonesia. **Japan:** Manulife Investment Management (Japan) Limited. **Malaysia:** Manulife Investment Management (M) Berhad 200801033087 (834424-U) **Philippines:** Manulife Investment Management and Trust Corporation. **Singapore:** Manulife Investment Management (Singapore) Pte. Ltd. (Company Registration No. 200709952G) **South Korea:** Manulife Investment Management (Hong Kong) Limited. Switzerland: Manulife IM (Switzerland) LLC. **Taiwan:** Manulife Investment Management (Taiwan) Co. Ltd. **United Kingdom:** Manulife Investment Management (Europe) Ltd. which is authorised and regulated by the Financial Conduct Authority **United States:** John Hancock Investment Management LLC, Manulife Investment Management (US) LLC, Manulife Investment Management Private Markets (US) LLC and Manulife Investment Management Timberland and Agriculture Inc. **Vietnam:** Manulife Investment Fund Management (Vietnam) Company Limited.

Manulife, Manulife Investment Management, Stylized M Design, and Manulife Investment Management & Stylized M Design are trademarks of The Manufacturers Life Insurance Company and are used by it, and by its affiliates under license.