

Manulife Investment Management (Europe) Limited

Annual Trade Execution Report

Year ended December 2020

April 2021

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1. Introduction

The second Markets in Financial Instruments Directive and associated regulations (“MiFID” and MIFIR”) requires investment firms to report annually on the quality of execution of orders and the top five venues used with regard to specific classes of financial instruments. We have produced this report based on our understanding of the requirements set out in Regulatory Technical Standard 28 (“RTS 28”), and corresponding rules in the FCA’s Conduct of Business sourcebook.

2. Purpose

It is important that we disclose the information below to allow you as an investor or potential client to evaluate the quality of our execution practices. The purpose of this report is to allow you to determine whether we have and continue to ensure sufficient coverage from our brokers when executing orders for our clients, giving due consideration to the types of instruments we need to trade and the volume of trading of those types of instruments.

3. Report Contents

This report provides you with the top 5 execution venues utilised by Manulife Investment Management (Europe) Limited (“MIM Europe”) for trade execution on behalf of our clients with respect to each of the financial instrument types we have traded for the year ending December 2020.

Through Manulife’s global trading model, the MIM Europe trading desk executes trades for portfolio investment management teams based locally in the UK and in other regions globally. The report captures all instruments traded by MIM Europe. It does not capture trading activity performed by other affiliates within the Manulife Financial group of affiliated companies. References to “We”, “Our” or “Manulife” in this document refer to MIM Europe.

RTS 28 requires the reporting of whether executions of orders were passive, aggressive or directed. “Passive” means an order entered into the order book on an exchange that provided liquidity. ‘Aggressive’ means an order entered into the order book that took liquidity from the exchange. ‘Directed’ means an order where a specific execution venue was specified by the client prior to the execution of the order. Where we execute orders using brokers, we do not believe those orders meet the definitions of passive, aggressive or directed and we have simply indicated that this is not applicable in the report. Where the firm executed in its capacity as a member or participant of a trading venue we have provided that data. Manulife’s core business is a discretionary investment management firm and as such it is rare that clients provide us with direct instructions.

We’ve chosen to exclude Initial Public Offerings or secondary placements in the market from the data. The effect of this exclusion is immaterial for Equities and Derivative instruments. It is material with respect to Fixed Income instruments where much of our trading is in newly issued instruments. Where this is the case, we do not have a choice of broker, venue or price, and inclusion of the data would not produce an accurate representation of our execution quality and practices.

When calculating the percentage values, this has been done on a value basis using USD as the common reference currency (USD) across all asset classes.

4. General Disclosures

RTS 28 requires that we make the following commentary and disclosures:

- We do not have any close links, conflicts of interest and common ownership with respect to any execution venues used to execute orders and we do not trade with affiliated companies.
- We do not have any specific arrangements with any execution venues with regards to payments made or received, discounts or rebates received, or other non-monetary benefits. The way we assess costs of execution are set out in [Order Execution Policy Statement](#) available on our website.
- Our order execution arrangements do not differ according to client categorisation. MIM Europe is authorised to deal on behalf of professional clients only, and as such all clients covered by this report are classified as professional.
- We have reviewed samples of the RTS 27 trading venue data published by our counterparties but we have been unable to find any value in it at present and it has not been incorporated into our current execution review procedures. We continue to monitor developments in this space.
- A description of our trading governance framework and a summary of our use of transaction cost analysis (“TCA”) is included in our [Order Execution Policy Statement](#) available on our website. We use TCA to review execution across equities, fixed income and foreign exchange instruments and where TCA is not available we have alternative oversight and review processes in place. Where our TCA data includes the trading data relating to the underlying execution venues that a counterparty has utilised we review this when considering the counterparty’s execution performance. In addition, we discuss our counterparties’ execution processes and the execution venues they utilise in the regular meetings we have with them.
- At present there is no consolidated tape provider and therefore we have not used consolidated tape data in our execution arrangements.

5. Equities - Shares and Depositary Receipts

Tick size liquidity bands 5 and 6 (2000 trades per day and above)

Less than 1 trade per business day		No				
Broker	Legal Entity Identifier (LEI)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
MERRILL LYNCH INTERNATIONAL	GGDZP1UYGU9STUHRDP48	28.28	24.87	N/A	N/A	0
JP MORGAN SECURITIES PLC	K6Q0W1PS1L1O4IQL9C32	16.40	14.17	N/A	N/A	0
MORGAN STANLEY & CO INTERNATIONAL PLC	4PQUHN3JPF GFNF3BB653	12.09	11.93	N/A	N/A	0
GOLDMAN SACHS INTERNATIONAL	W22LROWP2IHZNBB6K528	10.91	9.28	N/A	N/A	0
SANFORD C. BERNSTEIN & CO., LLC	549300I7JYZHT7D5CO04	5.05	5.31	N/A	N/A	0

Tick size liquidity bands 3 and 4 (from 80 to 1,999 trades per day)

Less than 1 trade per business day		No				
Broker	Legal Entity Identifier (LEI)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
JP MORGAN SECURITIES PLC	K6Q0W1PS1L1O4IQL9C32	28.98	20.21	N/A	N/A	N/A
MERRILL LYNCH INTERNATIONAL	GGDZP1UYGU9STUHRDP48	27.21	29.19	N/A	N/A	N/A
GOLDMAN SACHS INTERNATIONAL	W22LROWP2IHZNBB6K528	13.86	14.61	N/A	N/A	N/A
MORGAN STANLEY & CO INTERNATIONAL PLC	4PQUHN3JPF GFNF3BB653	7.51	8.09	N/A	N/A	N/A
JEFFERIES INTERNATIONAL	S5THZMDUJCTQZBTRVI98	5.20	5.79	N/A	N/A	N/A

Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day)

Less than 1 trade per business day						
No						
Broker	Legal Entity Identifier (LEI)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
JP MORGAN SECURITIES PLC	K6Q0W1PS1L1O4IQL9C32	31.92	15.68	N/A	N/A	0
MERRILL LYNCH INTERNATIONAL	GGDZP1UYGU9STUHRDP48	12.33	8.18	N/A	N/A	0
UBS FINANCIAL SERVICES INC.	ETYRV6ORNFJB5NONI676	10.30	34.71	N/A	N/A	0
MORGAN STANLEY & CO INTERNATIONAL PLC	4PQUHN3JPF GFNF3BB653	10.22	6.32	N/A	N/A	0
GOLDMAN SACHS INTERNATIONAL	W22LROWP2IHZNBB6K528	9.52	6.43	N/A	N/A	0

Equities – Shares and Depositary Receipts with no tick size available*

Less than 1 trade per business day						
No						
Broker	Legal Entity Identifier (LEI)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
MERRILL LYNCH INTERNATIONAL	GGDZP1UYGU9STUHRDP48	26.34	18.89	N/A	N/A	0
CITIGROUP GLOBAL MARKETS LIMITED	XKZZ2JZF41MRHTR1V493	22.56	7.45	N/A	N/A	0
MORGAN STANLEY & CO INTERNATIONAL PLC	4PQUHN3JPF GFNF3BB653	15.06	18.46	N/A	N/A	0
CLSA UK	213800VZMAGVIU2IJA72	12.95	19.57	N/A	N/A	0
JP MORGAN SECURITIES PLC	K6Q0W1PS1L1O4IQL9C32	12.56	11.72	N/A	N/A	0

* ESMA does not publish a tick size for all equity instruments, generally non-European instruments. The table above represents top 5 brokers where no such tick size has been published and therefore does not fall into any specific liquidity band which is to follow in the subsequent tables. The counterparties above represent global institutions as well as local brokers. ADRs (American Depositary Receipts) are used as an investment tool to gain access to foreign company's stock which are listed on US exchanges, companies which are for example Chinese or Argentinian.

Commentary

Note: no cash equities venue data is appearing for the period as all trades were executed through brokers rather than directly with exchanges/Multi-lateral Trading Facility (MTFs)/Systematic Internalisers (SIs).

When placing or executing equity trades, relevant factors may have included, but were not limited to, the following: price; costs; the speed of execution; likelihood of execution and settlement; size, nature and type of the order; availability of liquidity in the security; financial condition and reputation of the broker-dealer; broker specific considerations (e.g., not all brokers may be able to execute all types of trades such as specialisation in certain Markets); broker willingness to commit capital; and confidentiality.

For cash equities, there were no new brokers added to the trading counterparties list, a number of brokers were removed due to lack of trading activity, this has no impact on execution quality. The counterparties with global coverage continue to provide access to liquidity across all bands, while local broker counterparties assist for more illiquid instruments. 2020 data is in-keeping with 2019 broker tables with minor changes with their order. Local brokers added in 2019 have assisted the business focuses in 2020, such as Russian local equities.

6. Equity Derivatives: Futures and Options Admitted to Trading on a Trading Venue

Less than 1 trade per business day	No					
Broker	Legal Entity Identifier (LEI)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
CITIGROUP GLOBAL MARKETS LIMITED	XKZZ2JZF41MRHTR1V493	30.61	32.59	N/A	N/A	0
UBS SECURITIES LLC	T6FIZBDPKLYJKFCRVK44	27.10	23.08	N/A	N/A	0
E D & F MAN CAPITAL MARKETS LTD	GKS4XBH2YSEYMX83N473	21.68	29.88	N/A	N/A	0
GOLDMAN SACHS INTERNATIONAL	W22LROWP2IHZNBB6K528	12.01	4.32	N/A	N/A	0
GOLDMAN SACHS & CO LLC	FOR8UP27PHTHYVLBN30	4.55	3.58	N/A	N/A	0

Note: No Venue data is available for the period.

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Commentary

When placing or executing equity derivatives, relevant factors may have included, but were not limited to the following: price; costs; the speed of execution; likelihood of execution and settlement; size, nature and type of the order; availability of liquidity in the security; financial condition and reputation of the broker; broker specific considerations (e.g., not all brokers may be able to execute all types of trades and may specialise in certain markets); and minimal potential for information leakage. All our futures and options are exchange traded and, therefore, there is no price differential on a dealer basis.

This table is reflective of European futures and options only as classified by MiFID instrument class and itself taken from ESMA FIRDS. Non-European equity futures are categorised in Section 9 "Equity Derivatives: Swaps and Other Equity Derivatives".

Over 2020, we have added additional equity derivative brokers to our trading counterparties list for exchange listed futures and options to help increase choice. We have set up core global brokers across all the regions, to help strengthen our trading capabilities, to support our investment teams.

We have one client that requires we use one broker (UBS Securities LLC) that provides direct electronic access to markets. This arrangement is in place solely for this client. This does not impact execution quality for the end client as we are utilizing the broker's connection directly to the order book.

Two Goldman Sachs entities are appearing on the report as we interact with several entities of Goldman Sachs based on the type of order and time of execution. For example, trades executed during US hours (post European close) will execute with the US based entity

7. Exchange Traded Products (Exchange Traded Funds, Exchange Traded Notes and Exchange Traded Commodities)

Less than 1 trade per business day	No					
Broker	Legal Entity Identifier (LEI)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
HSBC BANK PLC	MP6I5ZYZBEU3UXPYFY54	66.97	22.98	N/A	N/A	0
CITIGROUP GLOBAL MARKETS LIMITED	XKZZ2JZF41MRHTR1V493	12.41	5.02	N/A	N/A	0
JP MORGAN SECURITIES PLC	K6QOW1PS1L1O4IQL9C32	12.25	51.17	N/A	N/A	0
MERRILL LYNCH INTERNATIONAL	GGDZP1UYGU9STUHRDP48	8.12	20.13	N/A	N/A	0
JPMORGAN CHASE BANK, N.A.	7H6GLXDRUGQFU57RNE97	0.26	0.69	N/A	N/A	0

Less than 1 trade per business day		Yes				
Venue	Market Identifier Code (MIC)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
HSBC – SYSTEMATIC INTERNALISER	HSBC	96.92	90	N/A	N/A	0
CITIGROUP GLOBAL MARKETS LIMITED – EMEA TRADING	CGMT	3.08	10	N/A	N/A	0

Commentary

When placing or executing Exchange Trades Products such as ETFs, relevant factors may have included, but were not limited to, the following: price; costs; the speed of execution; likelihood of execution and settlement; size, nature and type of the order; availability of liquidity in the security; financial condition and reputation of the broker-dealer; broker specific considerations (e.g., not all brokers may be able to execute all types of trades such as specialisation in certain Markets); and confidentiality.

Over 2020, we only executed a limited number of ETFs throughout the year. We have however taken steps to add additional brokers and coverage from existing brokers in this space for future business needs. HSBC and Citi are appearing as venues where we have executed OTC directly with their ETF desk and therefore not executed on the order book. Infrequently the order size is greater than liquidity provisions available on the current order book therefore we seek an OTC price for our order. In these instances, certainty of execution was the overriding factor.

8. Interest Rate Derivatives: Futures and Options Admitted to Trading on a Trading Venue

Less than 1 trade per business day	No					
Broker	Legal Entity Identifier (LEI)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
E D & F MAN CAPITAL MARKETS LTD	GKS4XBH2YSEYMX83N473	30.39	46.51	N/A	N/A	0
GOLDMAN SACHS & CO LLC	FOR8UP27PHTHYVLBNG30	19.02	1.88	N/A	N/A	0
SUCDEN FINANCIAL LIMITED	213800W2XOTEIWVRS823	16.31	19.27	N/A	N/A	0
UBS SECURITIES LLC	T6FIZBDPKLYJKFCRVK44	11.03	10.72	N/A	N/A	0
CITIGROUP GLOBAL MARKETS LIMITED	XKZZ2JZF41MRHTR1V493	9.86	14.85	N/A	N/A	0

Note: No Venue data is available for the period.

Commentary

When placing or executing interest rate derivatives, relevant factors may have included, but were not limited to, the following: price; costs; the speed of execution; likelihood of execution and settlement; size, nature and type of the order; availability of liquidity in the security; financial condition and reputation of the broker-dealer; broker specific considerations (e.g., not all brokers may be able to execute all types of trades such as specialisation in certain Markets); and minimal potential for information leakage. All our futures and options are exchange traded and, therefore, there is no price differential on a dealer basis.

This table is reflective of European futures and options only as classified by MiFID instrument class and itself taken from ESMA FIRDS. Non-European bond futures are categorised in Section 13- "Interest Rate Derivatives: Swaps, Forwards and other Interest Rate Derivatives".

Over 2020, we added additional fixed income derivative brokers to our trading counterparties list for exchange listed futures and options to help increase choice. We have set up core global brokers across all the regions, to help strengthen our trading capabilities and support our investment teams.

We have one client that requires we use one broker (UBS Securities LLC) that provides direct electronic access to markets. This arrangement is in place solely for this client. This does not impact execution quality for the end client as we are utilizing the broker's connection directly to the order book.

9. Equity Derivatives: Swaps and Other Equity Derivatives

Less than 1 trade per business day	No					
Broker	Legal Entity Identifier (LEI)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
UBS SECURITIES LLC	T6FIZBDPKLYJKFCRVK44	41.77	28.35	N/A	N/A	0
CITIGROUP GLOBAL MARKETS LIMITED	XKZZ2JZF41MRHTR1V493	23.69	40.83	N/A	N/A	0
E D & F MAN CAPITAL MARKETS LTD	GKS4XBH2YSEYMX83N473	19.30	18.03	N/A	N/A	0
GOLDMAN SACHS INTERNATIONAL	W22LROWP2IHZNBB6K528	8.82	5.34	N/A	N/A	0
GOLDMAN SACHS & CO LLC	FOR8UP27PHTHYVLBNG30	3.22	2.93	N/A	N/A	0

Note: No Venue data is available for the period.

Commentary

When placing or executing interest rate derivatives, relevant factors may have included, but were not limited to, the following: price; costs; the speed of execution; likelihood of execution and settlement; size, nature and type of the order; availability of liquidity in the security; financial condition and reputation of the broker-dealer; broker specific considerations (e.g., not all brokers may be able to execute all types of trades such as specialisation in certain Markets); and minimal potential for information leakage. All our futures and options are exchange traded and, therefore, there is no price differential on a dealer basis.

Please note Non-European equity futures are reflected in this table although they have been executed in the same manner as European equity futures i.e. on-exchange, this is how they have been classified under MiFID instrument class and itself taken from ESMA FIRDS. Therefore, this table looks similar to Section 6- "Equity Derivatives: Futures and Options Admitted to Trading on a Trading Venue".

Over 2020, we have added additional equity derivative brokers to our trading counterparties list for exchange listed futures and options to help increase choice. We have set up core global brokers across all the regions, to help strengthen our trading capabilities, to support our investment teams.

We have one client that requires we use one broker (UBS Securities LLC) that provides direct electronic access to markets. This arrangement is in place solely for this client. This does not impact execution quality for the end client as we are utilizing the broker's connection directly to the order book.

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Two entities of Goldmans are appearing on the report as we interact with several entities of Goldmans based on the type of order and time of execution. For example, trades executed during US hours (post European close) will execute with the US based entity.

10. Debt Instruments: Bonds

Less than 1 trade per business day		Yes				
Broker	Legal Entity Identifier (LEI)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
GOLDMAN SACHS INTERNATIONAL	W22LROWP2IHZNBB6K528	21.06	15.234	N/A	N/A	0
COMMONWEALTH BANK OF AUSTRALIA	MSFSBD3QN1GSN7Q6C537	8.87	2.86	N/A	N/A	0
NYKREDIT BANK A/S	52965FONQ5NZKP0WZL45	7.78	2.86	N/A	N/A	0
DEUTSCHE BANK AG	7LTFWZYICNSX8D621K86	7.45	3.81	N/A	N/A	0
THE TORONTO DOMINION BANK	PT3QB789TSUIDF371261	7.26	7.62	N/A	N/A	0

Less than 1 trade per business day		No				
Venue	Legal Entity Identifier (LEI)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
BLOOMBERG TRADING FACILITY LIMITED	BMTF	100	100	N/A	N/A	0

Commentary

The most important factors we consider when executing bond trades include but are not limited to; price, size of the trade relative to liquidity of that security, speed of execution, certainty of execution, broker willingness to commit capital, confidentiality, consistency of counterparty service, certainty of settlement without any operational issues.

The broker table reflects the top 5 brokers for trades which have been done off venue i.e. voice traded. Most trades are executed directly with counterparties using Bloomberg's multi-lateral trading facility (MTF), Multiple quotes are obtained from counterparties in competition. The Broker table is not inclusive of those BMTF transactions. The top 5 brokers on BMTF were: Nomura International Plc, Citigroup Global Markets Limited, JP Morgan Securities plc, Morgan Stanley & Co International plc and Natwest Markets Plc.

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We expect a high response rate to Request for Quotes (RFQs) on Bloomberg MTF for liquid securities. For larger or less liquid trades, dealing directly with counterparties outside of the MTF can be advantageous, in these cases broker's inventory may be overriding factor in determining where to execute.

Over 2020, we have added additional bond brokers to our trading counterparties list to help strengthen our trading capabilities in where gaps had been identified, e.g. brokers covering the likes of Japanese Bonds or additional European Credit coverage.

11. Money Markets

Less than 1 trade per business day	Yes					
Broker	Legal Entity Identifier (LEI)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
UBS AG	BFM8T61CT2L1QCCEMIK50	100	100	N/A	N/A	0

Less than 1 trade per business day	Yes					
Venue	Legal Entity Identifier (LEI)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
BLOOMBERG TRADING FACILITY LIMITED	BMTF	100	100	N/A	N/A	0

Commentary

The most important factors we consider when executing money market trades include but are not limited to; price, size of the trade relative to liquidity of that security, speed of execution, certainty of execution, broker willingness to commit capital, confidentiality, consistency of counterparty service, certainty of settlement without any operational issues. Securities under 1 year maturity falls under money market, as per ESMA.

Over 2020, we only executed a small number of Money Market trades throughout the year. The broker table reflects trades (1) which was executed off-venue, i.e. voice, whereas the venue trade reflects other Money Market trades which were executed via Bloomberg MTF (additional 5 orders). The trade with UBS was where they were the only provider for one floating rate instrument and were subsequently the only broker who held inventory for this instrument, as such, certainty of execution was the overriding factor.

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As shown in venue table, Bloomberg multilateral trading facility (MTF) is our key venue for execution. From here, multiple quotes are obtained from counterparties in competition. The brokers which we executed with on the platform included the Toronto Dominion Bank, Danske Bank A/S, Goldman Sachs International and Mizuho International PLC.

12. Currency Derivatives: Swaps, Forwards and Other Currency Derivatives

Less than 1 trade per business day		No				
Broker	Legal Entity Identifier (LEI)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
UBS SECURITIES LLC	T6FIZBDPKLYJKFCRVK44	94.23	60.68	N/A	N/A	0
GOLDMAN SACHS INTERNATIONAL	W22LROWP2IHZNBB6K528	1.41	8.08	N/A	N/A	0
MERRILL LYNCH INTERNATIONAL	GGDZP1UYGU9STUHRDP48	1.07	4.25	N/A	N/A	0
JP MORGAN SECURITIES PLC	K6Q0W1PS1L1O4IQL9C32	0.78	3.72	N/A	N/A	0
HSBC BANK PLC	MP6I5ZYZBEU3UXPYFY54	0.76	7.01	N/A	N/A	0

Less than 1 trade per business day		No				
Venue	Market Identifier Code (MIC)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
FXConnect	MFXC	100	100	N/A	N/A	

Commentary

Manulife considered one or more of the following factors as appropriate when placing or executing currency trades: price/exchange rate, availability of liquidity in the currency, execution efficiency, likelihood of settlement, size, nature and type of the order, creditworthiness of counterparty, dealer specific restrictions (i.e., not all dealers may be able to execute all types of trades), expertise regarding the relevant currency markets, speed of executions, certainty of trade

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executions, reasonableness of compensation (spread) to be paid, nature and characteristics of the currency being traded, the potential for avoiding market impact and information leakage, and/or the quality of execution services rendered on a continuing basis.

For our FX executions (FX spots, forwards and options) we have several brokers on our trading counterparty list, there have been no additions to this list given the large number of brokers we have already available, no brokers were required to be removed. Those represented above are consistent with 2020's report with some movement in the order they appear.

The Broker table reflects currency futures and FX Options. All FX spot and forward transactions are either executed or confirmed on FX Connect, including voice trades. The top 5 brokers for FX spot and forwards were: Citigroup Global Markets Limited, State Street Bank and Trust Company, HSBC Bank USA, JP Morgan Securities plc and Morgan Stanley & Co International plc.

13. Interest Rate Derivatives: Swaps, Forwards and other Interest Rate Derivatives

Less than 1 trade per business day	No					
Broker	Legal Entity Identifier (LEI)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
E D & F MAN CAPITAL MARKETS LTD	GKS4XBH2YSEYMX83N473	37.10	37.11	N/A	N/A	0
SUCDEN FINANCIAL LIMITED	213800W2XOTEIWVRS823	20.80	19.78	N/A	N/A	0
CITIGROUP GLOBAL MARKETS LIMITED	XKZZ2JZF41MRHTR1V493	14.69	17.80	N/A	N/A	0
UBS SECURITIES LLC	T6FIZBDPKLYJKFCRVK44	8.87	11.99	N/A	N/A	0
GOLDMAN SACHS & CO LLC	FOR8UP27PHTHYVLBNG30	7.12	3.40	N/A	N/A	0

Note: No Venue data is available for the period.

Commentary

Manulife considered one or more of the following factors as appropriate when placing or executing interest rate swaps: price, cost, certainty of execution, likelihood of settlement, size, nature and type of the order, creditworthiness of counterparty, dealer specific restrictions (i.e., not all dealers may be able to execute all types of trades i.e. bilateral vs cleared), expertise regarding the relevant markets, speed of executions, nature and characteristics of the Interest Rate Swaps (IRS) being traded, the potential for avoiding information leakage, and/or the quality of execution services rendered on a continuing basis.

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Please note Non-European bond futures are reflected in this table although they have been executed in the same manner as European bond futures i.e. on-exchange, this is how they have been classified under MiFID instrument class and itself taken from ESMA FIRDS. While IRS transactions are reflected in this category, frequency and size of non-European bond futures makes up the top 5 broker list as a result. Therefore, this table looks similar to Section 8- “Interest Rate Derivatives: Futures and Options Admitted to Trading on a Trading Venue”.

Over 2020, we have added additional fixed income derivative brokers to our trading counterparties list for exchange listed futures and options to help increase choice. We have set up core global brokers across all the regions, to help strengthen our trading capabilities, to support our investment teams.

14. Other Instruments

Less than 1 trade per business day		Yes				
Broker	Legal Entity Identifier (LEI)	% of Volume in asset class	% of Orders in asset class	% of passive orders	% of aggressive orders	% of directed orders
Morgan Stanley & Co International plc	4PQUHN3JPFGFNF3BB653	60.936113	47.681639	N/A	N/A	
Itau BBA USA Securities Inc	5493008E85XK12EKYI22	20.654313	33.16668	N/A	N/A	
Merrill Lynch International	GGDZP1UYGU9STUHRDP48	18.409574	19.151681	N/A	N/A	

Note: No Venue data is available for the period.

Commentary

These are instruments which do not fall into any of the above classifications. The above table refers to emerging markets equities which have been classified as “units” in Bloomberg rather than “common stock”. They trade and are executed in the same manner as any other cash equity. Only two instruments fell into “Other Instruments” category, a Brazilian and Mexican instrument which accounts for the top 3 brokers being Global banks and a Latin American focused broker. These 2 instruments have only been executed infrequently in 2020.

Similar instruments have been traded the previous year, hence the Top 5 brokers from 2018, 2019 and 2020 are similar.

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