

No consideration of
adverse impacts of
investment decisions on
sustainability factors by
Manulife Investment
Management (Ireland)
Limited

Manulife Investment
Management (Ireland)
Limited

Statement on
Principle Adverse
Impacts

17 June 2025

17 June 2025

Statement on Principal Adverse Impacts

Objective and Scope

This Statement on Principal Adverse Impacts (the “Statement”) provides an explanation of the approach to which, Manulife Investment Management (Ireland) Limited (the “Company”) considers the principal adverse impacts (“PAI”) of investment decisions on sustainability factors, as required under Article 4 of the Sustainable Finance Disclosure Regulation (“SFDR”)¹.

This Statement is provided in our capacity, and in alignment with our regulatory responsibilities.

As at the date of this Statement, the Company does not consider the adverse impacts of investment decisions on sustainability factors to the extent set down in Article 4 of SFDR. As such, we are required to provide clear reasons for why we do not fully do so including, where relevant, information as to whether and when we intend to consider such adverse impacts. This is explained in this Statement.

Under Article 7 of SFDR, we are required also to disclose for each of our funds whether, and if so how, that fund considers PAIs on sustainability factors. Further detail on our approach is explained below and the relevant disclosures for all funds are included in the relevant fund offering document.

As explained below, we do consider the impacts of principal adverse impacts on behalf of the Article 8 and Article 9 funds we operate.

No consideration of adverse impacts of investment decisions on sustainability factors

“Principal adverse impacts” are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters (“sustainability factors”). There is a very wide range of sustainability factors relevant to sustainable investing and these continue to evolve. The Company has considered the requirements of the PAI regime under Article 4 of SFDR and the related regulatory technical standards² (“PAI reporting”).

Whilst the Company supports the aims of PAI reporting, it does not currently consider the PAI of investment decisions on sustainability factors at a management company level for the purposes of, or to the detailed extent required by, Article 4 of SFDR.

Accordingly, the Company is currently opting out of PAI reporting obligations otherwise required under Article 4 of SFDR.

The Company will review its decision to opt out of the PAI regime on an annual basis and reserves the right to change its current position in this regard.

1 Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector

2 Commission Delegated Regulation (EU) 2022/1288

Instead, the Company will take into account PAI and make the relevant detailed disclosures only on behalf of the Article 8 and Article 9 funds it manages, under the provisions of Article 7 of SFDR, which sets out PAI reporting at fund-level.

The PAI reporting requirement under Article 4 of SFDR would require that we consider all assets under management (“AUM”). However, many of the funds managed by the Company are not categorised as Article 8 or Article 9 funds. The funds which are not categorised as Article 8 or Article 9 funds do not promote environmental or social characteristics or have a sustainable investment objective, and they are not subject to any detailed reporting on sustainability metrics under SFDR. For such funds, the Company is therefore currently of the view that PAI reporting is less relevant and not reflective of the way those funds are either operated or sold to investors.

However, the Company does consider that the processes employed in respect of the integration of sustainability risks in investment decision making for all of its funds, including those which are not categorised as Article 8 or Article 9 funds, are robust from a risk perspective and in line with expectations for funds that do not promote sustainability criteria. For further disclosures on the consideration of PAIs at fund level, including the approach taken by any investment managers and/or sub-investment managers the Company delegates to, please see the fund offering document for the relevant fund.

IMPORTANT INFORMATION

The Company is authorised and regulated by the Central Bank of Ireland (Reference Number: C185149). This document was prepared solely for informational purposes and does not constitute, and is not intended to constitute, a recommendation, professional advice, an offer, solicitation or an invitation by or on behalf of the Company to any person to buy or sell any security or to adopt any investment strategy, and shall not form the basis of, nor may it accompany nor form part of, any right or contract to buy or sell any security or to adopt any investment strategy. Nothing in this material constitutes investment, legal, accounting, tax or other advice, or a representation that any investment or strategy is suitable or appropriate to your individual circumstances, or otherwise constitutes a personal recommendation to you. The Company does not provide legal or tax advice, and you are encouraged to consult your own lawyer, accountant, or other advisor before making any financial decision. Registered Office: Second Floor, 5 Earlsfort Terrace, Dublin D02 CK83, Ireland. Registered in Ireland under company no. 635225.

17 June 2025