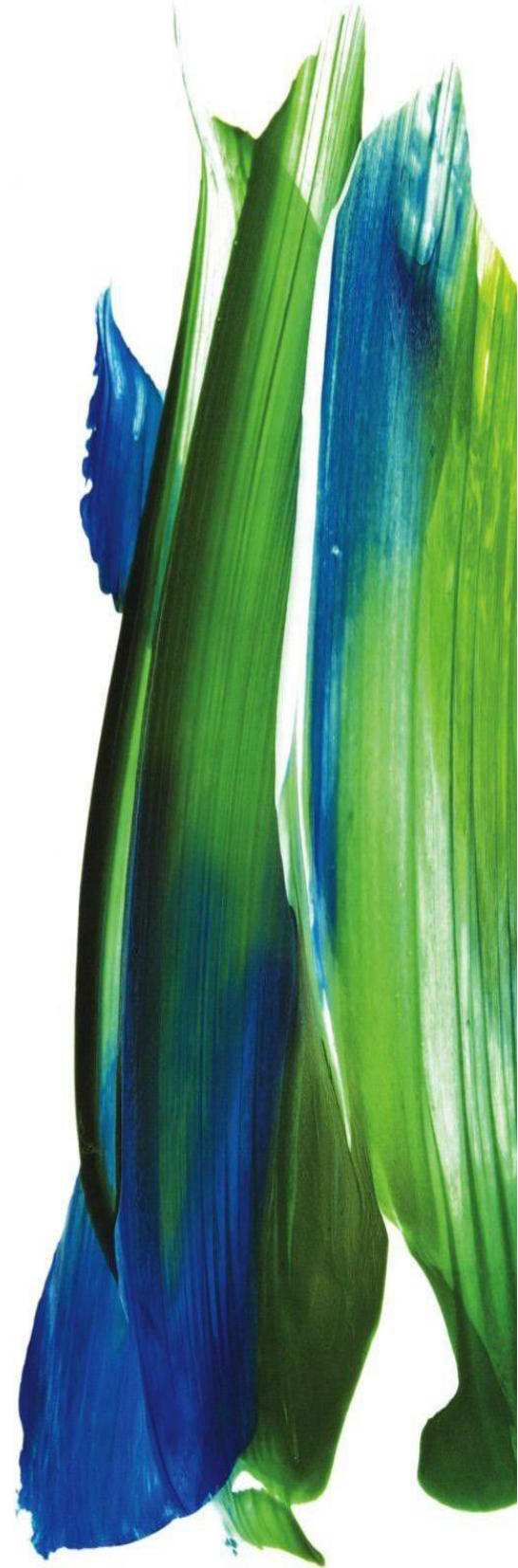


**Manulife  
Investment  
Management  
(Ireland) Limited  
(‘MIMIL’)**

Sustainability Risk Policy

17 June 2025



## Objective and scope

This Sustainability Risk Policy (Policy) provides an overview of the approach to sustainability risk integration taken by Manulife Investment Management (Ireland) Limited (the “Company”) in our capacity, and in alignment with our regulatory responsibilities, as a management company.

Under Article 6 of the Sustainable Finance Disclosure Regulation (SFDR), we are required to describe the manner in which sustainability risks are integrated into our investment decision-making processes. As we currently delegate day to day investment management of our funds, we look to our sub-investment managers (Delegated IMs) to implement and adhere to their own sustainability risk policies and processes as required under relevant regulations.

This Policy:

1. describes how we evaluate our Delegated IMs on their integration of sustainability risks and factors into their investment decision-making processes; and
2. explains the approach we take in the appointment and ongoing monitoring of our Delegated IMs in relation to the integration of sustainability risks.

Our philosophy provides a flexible framework that supports implementation across different asset classes, strategies and investment teams, allowing our Delegated IMs to apply the integration approach they consider is most relevant for the products they manage for us on a day-to-day basis.

Our approach to sustainability is always evolving as we develop our policies and processes regarding our Delegated IMs and, as such, this Policy will continue to evolve over time and will be reviewed and updated regularly.

## Oversight and governance

It is our responsibility as a management company to ensure that we carry out robust governance, monitoring and oversight of our funds and of our Delegated IMs. Our approach is explained throughout this document. In summary, we will:

- consider sustainability risks in the selection and appointment of new Delegated IMs, including the manner in which that investment manager integrates sustainability risks into its investment decision-making process; and
- carry out ongoing monitoring of our Delegated IMs’ approach to the integration of sustainability risks. This may include the receipt of periodic reporting on the Delegated IM’s approach to sustainability risks and, where relevant, the impact of sustainability risks on the fund(s) managed by that Delegated IM.

## Our approach to sustainability risk integration

A sustainability risk is any environmental, social and governance (ESG) event that, if it occurs, could or will have a material negative impact on the value of our funds' investments and therefore on our investors' returns.

Sustainability factors include environmental, social and employee matters, respect for human rights, and anti-corruption and anti-bribery matters.

The integration of sustainability risks into the investment decision-making process allows us to gain a more comprehensive understanding of both the risks and the long-term opportunities arising from these factors, helping us to deliver attractive risk-adjusted returns to our clients over the long term.

As such, (with the exception of Excluded Strategies as outlined below) we expect our Delegated IMs to have in place an investment process that includes consideration of the sustainability risks that could impact the risk and return profile of current and potential investments of the funds they manage for us.

We recognize our clients' needs in this area are expanding, and their own stakeholders are demanding a formal adoption of sustainable investing practices. Our commitment to implementing and continuously developing our own sound practices is consistent with our responsibility to help clients achieve their goals.

While we also recognize that the scope of sustainability risks and related sustainability factors relevant to investing will continually evolve, these may include:

- Board structure, diversity, and oversight
- Executive compensation: structure, performance metrics, and oversight
- Minority shareholder rights protection
- Capital management, dividend payouts, and dilution
- Corporate actions (e.g., M&A) and corporate strategy
- Climate change, pollution, natural resources utilization, and other environmental issues
- Health and safety, labor relations, diversity and other social issues
- Human rights, respect for the community and other stakeholder expectations
- Supply chain oversight and management
- Technological innovation and disruption
- Cyber security and privacy
- Population demographic shifts
- Resiliency of infrastructure
- Significant ESG related controversies
- Quality of ESG disclosure and transparency

## Excluded strategies

Currently, consideration of sustainability risks may not be systematically integrated into the investment decision-making process for certain funds where we believe, together with the Delegated IM, that they are of limited relevance (for example in currency investing or in certain classes of derivatives). Where this is the case, this will be disclosed in the additional disclosure documentation for these strategies and the remainder of this Policy should be construed accordingly. The rationale for the exclusion of particular funds from this Policy will be reviewed at least annually to ensure that the rationale for the exclusion remains appropriate given the evolving nature and availability of sustainable investments

### Continuous integration of sustainability risks

We expect our Delegated IMs, other than with respect to Excluded Strategies, to make decisions in line with their stated investment philosophy, including their stated approach to the integration of sustainability risks. Subject to our governance and oversight responsibilities, each Delegated IM has responsibility for its own investment process, from research through implementation.

The manner in which sustainability risks are integrated into the investment decision making process will differ between asset classes, strategies and Delegated IMs.

However, subject to any particular exceptions as noted below, we expect our Delegated IMs to:

1. have the appropriate capabilities to carry out robust sustainability risk integration processes to take into account material sustainability risks;
2. implement their own detailed sustainability risk policy suitable to the fund or funds they manage;
3. identify, consider and incorporate material sustainability risks and factors to the extent they reasonably consider appropriate as part of their overall ongoing investment process and when carrying out initial due diligence on each investment;
4. where possible and required by relevant regulations, collect ESG data and reporting on their portfolios and to produce periodic ESG reporting on the funds.

We assess each Delegated IM's approach to sustainability risk integration through our dedicated manager oversight team. This consideration will range from ESG specific questions at the selection phase to annual monitoring of sustainability risk integration. We also carry out periodic due diligence to ensure that Delegated IMs have their own robust sustainability risk integration policies.

### Pre-investment due diligence

As part of the due diligence process, we assess our Delegated IMs approach to:

- identifying, verifying and assessing sustainability risks and factors material to an investment and how they incorporate these issues into their investment analysis and decision making process. This process may influence their valuations and portfolio construction decisions, where relevant.
- using internal and/or external ESG research, data and other relevant methodologies to support their due diligence analysis.

Delegated IMs may also consider the responses of investee company management teams to inquiries focused on their ability and willingness to manage ESG issues.

- documenting their conclusions about the materiality of sustainability risks and factors in relation to their investment decisions.

Delegated IMs, taking into account the philosophy of the relevant fund and all material financial and non-financial factors, may choose not to invest in any potential investment that they have assessed to pose a material sustainability risk.

## Portfolio Monitoring

Once an investment is made, whether or not sustainability risks were identified in the due diligence process, we expect our Delegated IMs to:

- continuously monitor all material aspects that could impact an asset or company, including sustainability risks and factors
- conduct, on a periodic basis, reviews of individual investments or portfolios, and engage with us on potential sustainability risk
- Implement mitigation and engagement plans where sustainability risks have been identified
- provide us with periodic reporting on the ongoing monitoring of the relevant investments and funds to allow us to fulfil our own regulatory obligations with regard to governance, oversight and reporting

## Stewardship

Please refer to our Shareholder Engagement Policy at [ucits.manulifeim.com](http://ucits.manulifeim.com).

## Exclusions

In general, and in the absence of material sustainability or other risk factors, we prefer to engage with companies rather than exclude them.

An exception to that is our adherence to a Cluster Munitions Policy that aligns our operations with the business practices of our parent company, Manulife Financial Corporation. The Cluster Munitions Policy holds that we will not knowingly make direct investments in companies that manufacture cluster munitions. This policy applies to all investments made: (a) by or for the General Account of Manulife Financial Corporation's insurance company subsidiaries; and (b) for third-party clients of Manulife IM, where we have investment discretion. It may not apply to index investments, unaffiliated fund mandates (including unaffiliated Delegated IMs), and client-directed managed accounts.

Additional exclusions may also be applied by Delegated IMs either as a result of their own entity level exclusion requirements or on a fund specific basis. Any such additional exclusions will be set out in the relevant fund documentation from time to time.

## Transparency and Disclosure

All disclosures required by SFDR will be maintained by us and/or the Delegated IMs where relevant. We anticipate that these disclosures will evolve over time as the SFDR requirements are embedded throughout our operations. In the case of our UCITS funds, please visit our website at [ucits.manulifeim.com](http://ucits.manulifeim.com) for additional information about MIM Ireland