

WHISTLE BLOWING STATEMENT

Manulife's Code of Business Conduct and Ethics (“Code”)

Manulife is committed to applying the highest standards of integrity in all decisions and activities. Every year, each of our employees must confirm that they have complied with the Code. The Code provides standards for ethical behaviour when representing the Company and when dealing with customers, investors, employees, field representatives, external suppliers, competitors, government authorities and the public.

Whistle Blowing Policy

All our activities must be able to withstand close scrutiny. Manulife’s policy on whistle blowing is enshrined in the Code. Concerns on unethical, unprofessional, illegal, fraudulent or other questionable behavior may be reported, anonymously or not, without fear of retaliation. The Company absolutely prohibits retaliation of any kind for good faith reports of illegal or unethical behaviour.

What is Ethics Hotline?

The ethics hotline is a phone and web-based communications tool that offers a confidential way to report suspected unethical, unprofessional, illegal or fraudulent activity conducted by others associated with the Company. All information is kept confidential and all reports will be taken seriously. Telephone and web reporters may remain anonymous. Ethics Hotline telephone numbers; details of the reporting structure and process; FAQs; and a copy of the Code can be found on the Manulife Ethics website.

Who can report?

Manulife employees (permanent/contract/temporary) can report his/her concern(s) in accordance with the Code.

Third parties such as contractors, consultants, vendors, suppliers, sub-advisers, etc., can report his/her concern(s) by calling a confidential toll free Ethics Hotline or at www.ManulifeEthics.com.

Ethics hotline is not available to customers, any customer concerns should be directed to the appropriate customer service or compliance unit.

What type of situations should I report?

Ethics Hotline is a communications tool providing an avenue for sharing information of any kind that you regard as potential violations of the Code. This may include concerns regarding

unethical, unprofessional, illegal, fraudulent or other questionable behavior including but not limited to:

- Accounting and auditing practices
- Confidentiality, privacy, and intellectual property
- Conflicts of interest
- Illegal or suspected illegal acts
- Reputational risk
- Unfair business practices or misrepresentation

If the investigation of a report, which was made in good faith, is not to the Whistleblower's satisfaction, then he/she has the right to report the event to the appropriate law enforcement agency.