

Manulife Global Human Rights Statement

Our Commitment

Manulife is firmly committed to respecting human rights in our business operations and relationships, including our supply chain. Respect for human rights is embedded in our values, our decision-making, and our expectations of ourselves and our partners.

We are committed to upholding the principles set out under the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization's core conventions and the United Nations Global Compact. Where local law and international human rights standards differ, we will follow the higher standard; where they conflict, we will comply with the law, while seeking ways to respect international human rights within our spheres of influence and through our own business conduct.

This statement sets out Manulife's expectations of our officers and employees, business partners and other third parties we interact with in relation to our operations, products, and services. We will continue to integrate human rights considerations in our business processes, strengthen the development of in-house learning, management and leadership on human rights and demonstrate international good business practice.

Our Approach

To understand what salient human rights issues might be relevant to our business, we conduct human rights risk and impact assessments, then develop policies, processes and procedures with the intention to mitigate negative impacts and assess effectiveness. These vary by area of the business and/or geography.

We believe ethical business practices and good governance are integral to how we conduct our business and to our long-term success. Achieving this requires a commitment to integrity and consistent high standards from all partners, including our employees and vendors, and compliance with a framework of policies to help us manage our business:

- Our **Code of Business Conduct and Ethics ("the Code")** affirms the Company's commitment to ethical conduct and to operating within the laws and regulations of every jurisdiction in which we operate. Employees, contractors and members of the Board must undergo annual training and annually certify their compliance with the Code, be well-versed in its provisions, and conduct themselves according to both the letter and the spirit of those provisions. Under the Code, directors, officers, employees, subcontractors, subcontractor employees, and agents are strictly prohibited from

engaging in human trafficking-related activities. Prohibited activities include, among others, using force, fraud, or coercion to subject a person to involuntary servitude, and obtaining labour from a person by threats of harm to that person or another person. The Code will not be interpreted or applied to interfere with employee rights to self-organize, form, join, or assist labour organizations, to bargain collectively through representatives of their choosing, or to engage in other concerted activities for the purpose of collective bargaining or other mutual aid or protection, or to refrain from engaging in such activities.

- Our **Vendor Code of Conduct** sets expectations for our vendors and requires them to:
 - Ensure that the products and services they provide are in full compliance with all applicable laws and regulations at all times.
 - Respect the dignity and human rights of all workers, be committed to fair employment and labour practices, and not use any forced or child labour.
 - Comply with all applicable anti-slavery and human trafficking laws, statutes, regulations, and codes.
 - Implement due diligence procedures for their sub-contractors, suppliers and other participants in their supply chains to ensure that there is no slavery or human trafficking.
- Manulife's **Global Health and Safety Policy** outlines the Company's commitment to health and safety in the workplace. Manulife is committed to providing a safe and healthy workplace. Health and safety standards and procedures are compliant with local standards for responding to hazards, injuries, or illnesses in the workplace, conducting workplace inspections, collaborating with key stakeholders, and providing training as required. In line with local requirements where they exist, consultations with manager and worker representatives take place on a regular basis.
- As outlined in the **Global Discrimination, Harassment and Workplace Violence Policy**, the Company strictly prohibits discrimination, harassment and violence in the workplace. This policy is intended to address discrimination, harassment, and violence from all individuals with whom we come into contact in the workplace, including employees, contingent workers, contractors, customers, clients, and third parties. Manulife employees and contractors undergo regular training on discrimination, harassment, and workplace violence.
- As asset owners, Manulife works to respect and promote human rights in our investment decisions and stewardship activities. Our General Account investment teams are guided by Manulife General Account's internal Environmental, Social and Governance (ESG) Guidelines on the integration of ESG considerations, which include human rights, and support the responsible asset ownership practices of our wholly owned life insurance companies. Human rights considerations are incorporated into typical investment

due diligence and risk assessment processes which follow a principles-based approach that is guided by the potential materiality of ESG topics on investment outcomes.

- Manulife Investment Management believes sustainable investing helps build portfolio resilience to systemic risks and enhances long-term value creation potential. We review any human rights risks we identify in potential and existing investments to the extent we believe they are material to the risk reward profile of the investment. In addition, we take a client directed approach to meeting their sustainability objectives and where requested can incorporate human rights issues into investment screening and decision making. Our overall approach to human rights is reflected in several of our policies:
 - **Manulife Investment Management Sustainable Investing and Sustainable Risk Statement**
 - **Manulife Investment Management Responsible Contracting Statement**
 - **Global Cluster Munitions Policy (applicable to Manulife and Manulife Investment Management)**
 - **Manulife Investment Management Global Issuer Engagement Policy**
- In accordance with reporting requirements where Manulife is in scope, we disclose an annual Modern Slavery Act Statement.

Fostering an Inclusive and Equitable Culture

Our global diversity, equity and inclusion (DEI) aspiration is to cultivate a diverse and inclusive workplace, in which all colleagues are inspired to bring their authentic and whole selves to work, enabling them to thrive personally and professionally to best serve our customers, business partners and communities. We strive to attract, develop, and retain a diverse workforce and to foster a work environment that embraces the strength of cultures and individuals.

We are committed to ensuring equal opportunity and to building a workforce culture where everyone thrives and is deeply aware of the role they play in supporting DEI efforts across our offices globally. This is activated by continuing to develop a deep understanding of our workforce demographics and embedding inclusive practices into our Human Resources-related processes and programs.

We are committed to gender and racial pay equity and take steps to identify and mitigate the risk of unconscious bias in our pay practices and decisions. We monitor developments in this area and routinely review our compensation programs to maintain compliance with legal and regulatory requirements. We also regularly perform comparative pay analyses to ensure that pay for employees with comparable job grades, geographies, job families, performance levels, and experience is consistent. Please refer to our annual **Sustainability Report** for the results of our most recent pay analysis.

Roles and Responsibilities

Oversight of our ESG framework, including human rights matters, is part of the mandate of our Board of Directors' Corporate Governance and Nominating Committee, which complements the work of the Executive Sustainability Council (ESC). The ESC consists of our Global Chief Sustainability Officer along with nine members of our Executive Leadership Team, including our Chief Executive Officer. The ESC is responsible for adopting and implementing appropriate governance standards, ensuring adherence to the commitments in this statement. Responsibility for implementation of the ESG framework and related policies resides with senior management.

Reporting and Escalation

We acknowledge our role to respect and promote right to remedy when we may have caused or contributed to human rights issues. To do so, as noted in the Code, anyone who believes there has been a suspected violation of our policies to respect human rights can report it immediately to their manager, Human Resources, Company legal counsel or the confidential Manulife Ethics hotline at www.manulifeethics.com. Employees are encouraged to share any concerns with their leaders and they also have the option of posing questions to Manulife's Global Compliance Office. While the Ethics Hotline is intended primarily for the use of employees, third parties (e.g. shareholders, vendors, suppliers, community members, sub-advisers) may also report suspected unethical, unprofessional, illegal, or fraudulent activity.

For more information, refer to our [Sustainability Reporting](#).