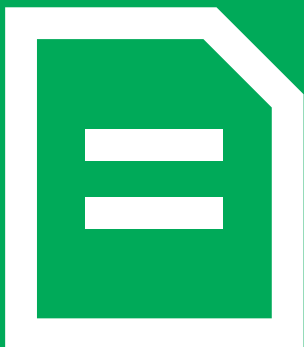


Manulife Financial Corporation's  
**Vendor Code of Conduct**



Manulife is a leading international financial services provider, helping people make their decisions easier and lives better. With our global headquarters in Toronto, Canada, we provide financial advice and insurance, operating as Manulife across Canada, Asia, and Europe, and primarily as John Hancock in the United States. Through Manulife Investment Management, the global brand for our Global Wealth and Asset Management segment, we serve individuals, institutions, and retirement plan members worldwide.

Operating in an ethical manner is essential to our success, and we strive to maintain high standards of integrity in everything we do. It is in our best interest to set high standards for ourselves at all times and to align ourselves with agents, representatives, suppliers, and business associates who have similar high standards of business conduct. All vendors who provide Manulife with services and/or products are expected to adhere to the requirements of Manulife's Vendor Code of Conduct ("Code").

### **The Purpose of this Code**

This Code sets forth Manulife's fundamental ethical and business conduct requirements for its vendors. This Code is not intended to be an exhaustive list of all requirements to be followed by vendors, but rather a high-level overview of those fundamental requirements. All references in this Code to "laws" means all applicable laws, regulations, directives, rules, decrees, and governmental orders. All vendors are also expected to self-monitor their compliance through their own processes and notify Manulife if a violation occurs.

The content of this Code has been informed by several international charters and conventions, such as the United Nation's Declaration on Human Rights and the International Labour Organizations (ILO) Core Conventions regarding forms of child labour, forced labour, freedom of association, the right to organize and bargain collectively, and the elimination of discrimination with respect to employment and occupation. Manulife is a signatory of the United Nations Global Compact (UNGC) and affirms our role to respect human rights in our value chain, as stipulated by the United Nations Guiding Principles on Business and Human Rights.

### **Legal and Regulatory Compliance**

Vendors, and the products and services they provide, must be in full compliance with all applicable laws and regulations at all times.

## **Ethical Business Practices**

Vendors must act with integrity and ethical behavior in all business dealings. Vendors must not offer, pay, or accept bribes or kickbacks of any kind. In addition, vendors must not give or receive any gifts or items of value that may influence the recipient's decision-making.

Vendors must also be free of conflicts of interest. Vendors must conduct business in an openly competitive environment that complies with all applicable anti-money laundering, anti-trust, and anti-corruption laws. It is expected that vendors will be truthful in discussions with Manulife employees and representatives, and that information provided during Requests for Proposals (RFP) fairly reflects the vendor's capabilities.

## **Privacy and Information Security**

Vendors must comply with all privacy and non-disclosure agreements, and only use information obtained from Manulife for the purpose defined by the contractual arrangement. Vendors must ensure that all information and data that Manulife provides to the vendor remains confidential and secure.

## **Human Rights**

We require our vendors to maintain policies and practices that respect human rights in accordance with applicable laws and global principles on human rights.

Manulife invites our business partners and vendors to emulate the standards, practices and principles outlined in our own [Global Human Rights Statement](#).

Vendors are required to mitigate human rights-related risks as indicated below:

### **Discrimination, Harassment and Violence**

Vendors must provide protections against workplace harassment and abuse, discrimination, and violence. Vendors must ensure a fair and equitable workplace environment that is free from any form of harassment or discrimination based on, but not limited to, age, race or ethnic origin, disability, gender, nationality, marital status, sexual orientation, political convictions, or union affiliation.

### **Fair Employment Practices**

**Working Hours and Wages:** Vendors must commit to being an ethical employer that strives to improve labour standards, respect its employees' contributions, and reward them fairly. Vendors must abide by applicable regulations governing minimum wage payments, and where none are available, ensure that salaries are commensurate with experience and industry standards. Vendors must also comply with applicable regulations regarding maximum working hours.

**Freedom of Association:** Vendors must respect the rights of employees and comply with all laws concerning freedom of association and collective bargaining.

### **Anti-Slavery and Human Trafficking**

Vendors must respect the free choice of all persons and strictly prohibit forced or compulsory labour. Vendors must comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes. Vendors must also implement due diligence procedures for its sub-contractors, suppliers and other participants in its supply chain to ensure that there is no slavery or human trafficking.

### **Child Labour**

Vendors must not engage in or condone the unlawful employment or exploitation of children. Vendors must be committed to combating the exploitation of children, and therefore prohibit any use of child labour with any vendor, supplier, or other third-party arrangements.

### **Drug-Free Workplace**

Vendors must comply with all applicable laws and regulations, including the requirements of the Drug-Free Workplace Act of 1988 for business activities in the United States. Vendors shall not assign any personnel to provide services to Manulife who are impaired by drug use. The use or possession of illegal drugs on Manulife property is strictly prohibited.

### **Health and Safety**

Vendors must provide healthy and safe workplaces to their employees. Vendors must comply with relevant health and safety laws and regulations and have practices in place that aim to minimize or eliminate any hazards in the working environment. Vendors must also consider employee wellness and safety, and promote health and well-being.

### **Disciplinary Practices**

For any of the salient human rights listed above, vendors must have clear grievance mechanisms to remediate any adverse impacts. It must be uniformly applied and include provisions prohibiting retaliation of any kind for good faith reports of illegal or unethical behaviour.

### **Environmental Protection and Conservation**

Manulife expects our vendors to comply with all applicable environmental laws and regulations, and to proactively minimize or mitigate the environmental impacts associated with their business activities. Vendors are encouraged to promote the efficient use of resources and energy, including the mitigation or reduction of emissions. This includes utilizing energy efficient equipment as part of their services, and, where applicable, ensuring that all waste is disposed of correctly and appropriate waste recycling schemes are implemented.

### **Compliance with the Vendor Code of Conduct**

Vendors must adhere to the Code and are expected to monitor compliance with the Code, and promptly report any violations to Manulife. Manulife reserves the right to monitor, assess, and audit all vendors according to the Code. Manulife may discontinue business with any vendor or representative that does not adhere to the practices outlined in the Code.

For other communications related to this Code, please email [VendorCodeofConduct@Manulife.com](mailto:VendorCodeofConduct@Manulife.com)

### **Manulife's Ethics Hotline**

Manulife's Ethics Hotline is available 24 hours per day, seven days per week. You may report suspected or potential illegal or unethical behaviour without any fear of retaliation. Contact the hotline at: [www.manulifeethics.com](http://www.manulifeethics.com) or 866-294-9534.