

Investment Division Americas & Europe Shared Business Entertainment and Gifts Policy

START

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Introduction

What does the Code of Business Conduct say about Shared Business Entertainment and Gifts?

Recognizes that the giving and receiving of shared business entertainment and modest gifts is a customary way to strengthen business relationships

Prohibits employees from receiving or giving any gift or entertainment to anyone with whom Manulife has or is likely to have business dealings, if it could be perceived as an attempt to influence the recipient's judgment in carrying out their duties to Manulife or their employer

Introduction

Why adopt a Policy?

Click on each tabs to reveal additional information.

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Commitment to the Manulife P.R.I.D.E. values and the expectations of our clients, investors and other stakeholders

Introduction

Special Requirements and Approvals

Seek guidance from Legal Department, Business Unit Compliance, Ethics Office or CCO prior to providing or accepting Shared Business Entertainment or Gifts from:

- Government Officials
- Agents and Representatives related to a RFP
- Rating Agency Representatives
- External Auditors
- Pension Plan Officials
- Insurance Customers and Prospects
- Broker/Counterparty (UK only)



Introduction

Who reports Shared Business Entertainment and gifts?

Manager Notification versus Quarterly Reporting

All employees are required to keep their managers informed of any Shared Business Entertainment (given or received) unless the entertainment or gift is exempt.

All employees with access to the personal Trading Compliance Center ("PTCC") must record reportable entertainment and



Introduction

Manager Notification

You can inform your manager directly

For expenses incurred by Manulife, your manager will be deemed to be notified of any gift or entertainment given if the expense was approved by your manager in Concur or other expense reimbursement system with appropriate description of the activity in the Concur system.

You and your manager may also agree that certain types of gifts and entertainment do not require specific manager notice each and every time. For example, you and your manager may agree that routine dinners with clients do not need to be reported to the manager each and every time, if they are otherwise recorded in PTCC



Key Elements - Entertainment

What is Shared Business Entertainment?



An event paid for by Manulife or a Third Party and attended by both employees of Manulife and the Third Party

Examples

Tickets to a sporting event, greens fees, lunches, dinners, spa treatments, concert tickets, tickets to charitable events, etc. **(when the donor is present)**

Quiz - Entertainment

Jane, a Manulife Employee, is offered 2 tickets to a Red Sox/Blue Jays game from a potential vendor, can Jane accept the tickets?

Instruction

Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua.

- ☒ Yes, Jane may accept the tickets.
- ☐ No, Jane may not accept the tickets.

Done