

15th December 2023

To the European Commission

Addendum: Targeted questionnaire on the Sustainable Finance Disclosure Regulation ("SFDR")

Submitted as attachment via the online Questionnaire.

Re: Submission to the online questionnaire: https://finance.ec.europa.eu/regulation-and-supervision/consultations/finance-2023-sfdr-implementation_en

Manulife Investment Management ("MIM") would like to thank the European Commission ("EC") for its work on the SFDR and commitment to further improving sustainable finance disclosures. We believe it is vitally important that market participants have clear, consistent, and transparent rules, and appreciate the opportunity to share our perspective on these matters. We are supportive of the current work being done and expect it will lead to improved consumer understanding of financial products as well as encourage capital flows to sustainable investments.

ABOUT MANULIFE INVESTMENT MANAGEMENT

Manulife Investment Management ("MIM") is the global brand for the global wealth and asset management segment of Manulife Financial Corporation and manages nearly €600 billion in assets worldwide. We draw on more than a century of financial stewardship and the full resources of our parent company to serve individuals, institutions, and retirement plan members worldwide. Headquartered in Toronto, our leading capabilities in public and private markets are strengthened by an investment footprint that spans 19 geographies.

We complement these capabilities by providing access to a network of unaffiliated asset managers from around the world. We're committed to investing responsibly across our businesses. We develop innovative global frameworks for sustainable investing, collaboratively engage with companies in our securities portfolios, and maintain a high standard of stewardship where we own and operate assets, and we believe in supporting financial well-being through our workplace retirement plans. Today, plan sponsors around the world rely on our retirement plan administration and investment expertise to help their employees plan for, save for, and live a better retirement. Not all offerings are available in all jurisdictions. For additional information, please visit manulifeim.com.

Manulife has operated in the European region for 30 years and in Ireland since 2018. MIM Ireland (Company Number 635225) is authorized as a UCITS Management Company and Alternative Investment Fund Manager and oversees nearly €5 billion in assets via both a Undertakings for Collective Investment in Transferable Securities ("UCITS") funds and Alternative Investment Fund ("AIFs").

ABOUT OUR SUBMISSION

We are pleased to have been able to provide a response to the SFDR targeted consultation questionnaire. We have taken the decision to provide two separate responses to the questionnaire as we do not feel that the questionnaire format appropriately apportions questions in relation to the challenges faced by different products, specifically public vs private market asset classes. It is important that the EC recognize that there are substantial differences in UCITS and AIFs products, and some of the product level requirements are unworkable for the AIF industry. There is an inherent

difference in the data availability and structure of the market that adds an increased complexity when seeking to adhere to the requirements in SFDR. We would be happy to meet to discuss our views in more detail should you wish.

Should you have any questions, please contact us and Emma MacDowall
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Sincerely,

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