



John Hancock is committed to preventing the use of its products and facilities for the purposes of money laundering, financing terrorist activities, and other suspicious activities. As such, we rely on producers to know their customers and be alert for signs which may indicate illegal activity. If you are aware of a potential suspicious activity related to the sale and/or servicing of John Hancock products, contact the John Hancock AML Office at 1-800-854-9979 or stopmoneylaundering@jhancock.com. Please review the following information for guidance related to John Hancock's AML Program.

Potential Suspicious Activity Red Flags:

While no single activity may automatically be considered suspicious, combinations of activities such the following should raise concerns:

- Payments in cash or cash equivalents (money orders, cashier checks, etc.), especially when checks are acquired in a pattern seemingly structured to avoid regulatory reporting requirements at the time of purchase.
- Transactions involving apparently unrelated third parties (e.g. incoming/outgoing funds, beneficiary designations).
- Product application inconsistent with customer needs.
- Substantial overpayment followed by request for refunds.
- Customers using product in a manner inconsistent with typical product objective (e.g. using loan feature as revolving credit line).
- Early product termination, even at a cost.

Recommended Forms of Payment:

A personal check, a business check or a pre-authorized payment in U.S. dollars from the customer's U.S. bank account made payable to the relevant John Hancock business is the recommended form of payment for transactions at John Hancock.

Consequences of a Money Laundering Incident:

A money laundering incident can have far-reaching consequences related to the aiding of criminal activity and funding terrorism. As such, it can result in severe civil and criminal penalties for the company, its producers, officers, directors, and employees. In addition, a money laundering situation which we knowingly or unknowingly allowed could:

- Tarnish John Hancock's and the producer's reputations
- Damage relationships with business partners
- Erode the trust of customers and regulators

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