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This wrap-fee program brochure provides information about the qualifications and business practices of John Hancock Personal Financial Services, LLC, (“JHPFS”). If you have any questions about the contents of this Brochure, please contact us at (844) 328-2122. The website for JHPFS and its program, MyPortfolio is www.jhmyportfolio.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”) or by any state securities authority.

Additional information about JHPFS also is available on the SEC’s website at www.adviserinfo.sec.gov.

JHPFS is a registered investment adviser. Registration of an investment adviser does not imply a certain level of skill or training.

Item 2 – Material Changes

Not applicable. This brochure was initially filed with the SEC on September 1, 2016.

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Item 4 – Services, Fees and Compensation

JHPFS is a Delaware limited liability company founded in 2014. JHPFS's principal owner is The Manufacturers Investment Corporation, which is an indirect, majority-owned subsidiary of Manulife Financial Corporation ("MFC"), a diversified international management and holding company with interests in companies that are active in, among other things, financial services and insurance. MFC is a publicly traded company listed on the Toronto Stock Exchange, the New York Stock Exchange, the Stock Exchange of Hong Kong and the Philippine Stock Exchange under the ticker symbol MFC.

JHPFS provides discretionary advisory services in connection with JHPFS's managed account program, MyPortfolio (the "Program") as well as other programs. This brochure is limited to the Program.

Overview

The Program utilizes an interactive website to collect information on a client and provide investment advice through computer-based applications. The Program utilizes portfolios ("Models") that are comprised of exchange-traded funds ("ETFs"). The sponsor and portfolio manager of the Program is JHPFS. JHPFS manages client accounts on a discretionary basis. Manulife Asset Management ("MAM"), an affiliate of JHPFS, creates and maintains the Models and recommends ETFs for the Models in the Program.

The provision of discretionary investment advisory services to clients has been structured to follow the conditions of Rule 3a-4 (the "Rule") under the Investment Company Act of 1940, as amended. JHPFS is the "sponsor" of the Program within the meaning of the Rule.

There is no guarantee that the advisory services offered under the JHPFS program will result in the clients' goals and objectives being met. Nor is there any guarantee of profit or protection from loss.

About The Program

JHPFS manages the Program, which offers individual clients actively managed portfolios comprised of ETFs. JHPFS is granted investment discretion and will continuously monitor each client's portfolio through computer based applications. MAM provides JHPFS with recommended Models based on specific investment strategies and risk tolerances and may, from time to time, recommend changes to asset class allocations and specific investment selections. JHPFS is responsible for the evaluation, selection and ongoing monitoring of MAM's services to JHPFS. Models may be added at any time without prior notice to clients.

To determine a client's investment objectives, a client provides certain information through JHPFS's interactive website. Through the use of computer based applications, JHPFS assigns a model portfolio based on the client's investment time horizon and risk tolerance. When

managing a client's account, JHPFS is relying on the information obtained about the client through the website. The client is responsible for providing JHPFS with any changes to this information. The client gives investment discretion to JHPFS to manage their account and make trades in their account. Clients will not be allowed to make trades in their account.

The client may impose reasonable restrictions on the management of their account subject to JHPFS's determination that the restriction is reasonable. A request to impose restrictions on the management of an account may result in delays in the implementation of the Program. The performance of accounts subject to reasonable restrictions may differ from accounts that are not subject to restrictions, possibly producing lower overall results. While a client may impose reasonable restrictions on their account, it is not possible to impose restrictions on how the underlying ETFs are managed. These underlying investments are subject to investment restrictions described in the applicable prospectus, Statement of Additional Information or other offering documents and restrictions under applicable law.

Accounts in the Program are rebalanced periodically through the use of computer based applications to maintain target asset allocations and risk levels. Rebalancing will generally occur quarterly based on the anniversary date of the creation of the account and then once the investments in the account are reset to follow any changes in the Model portfolio, rebalancing will generally occur quarterly based on the anniversary date of the reset. Rebalancing may occur more frequently due to market conditions. JHPFS in its sole discretion may decide to delay a scheduled rebalancing due to unfavorable or volatile market conditions. This delay could adversely affect the performance of the account. All trades for an account including those for rebalancing are sent to TD Ameritrade based on a randomized process in order to avoid favoring one account over another. Therefore, different accounts may not receive the same price per share for a particular ETF even if the accounts are rebalanced on the same day.

A rebalancing is triggered when the amount invested in a particular ETF has drifted by more than a predetermined percentage from the target allocation. For example, if the target allocation for an ETF is set at 20% of the total portfolio value and the drift trigger is set at 10%, the ETF will be rebalanced only if the amount invested has drifted 2% greater than the target allocation (*i.e.*, 22%) or 2% less than the target allocation (*i.e.*, 18%). Rebalancing frequency and drift tolerance levels may be changed in the future. Rebalancing may result in taxable gains or losses in a Program account.

ETFs are only traded in whole shares for a Program account. Any dividends paid on the ETFs in the Program account are deposited in the account's cash account. If the amount of cash in the cash account exceeds the target allocation to cash by more than a certain amount determined from time to time by JHPFS, JHPFS will invest the cash in ETF shares.

Clients can communicate with JHPFS via electronic channels and via telephone.

Clients use a web application to determine whether the Program is appropriate for them and, if so, to select an investment strategy. Clients complete their assessment online and therefore clients should carefully consider whether their participation in the Program is

appropriate for their investment goals. Clients can change their investment strategy by going online and completing a new web assessment.

During the online application process, clients agree that records and disclosure for the Program will be delivered, and agreements will be signed, electronically. This is a requirement both now and in the future. This includes this Form ADV brochure, any other disclosure brochures, supplements, Privacy Notice and other documents relating to a client's account. Each client has an obligation to maintain an accurate and up-to-date email address with JHPFS and to ensure that the client has the ability to read, download, print, and retain documents the client receives from JHPFS. If a client is unable or unwilling to accept electronic delivery, the client's enrollment in the Program and their account may be terminated.

JHPFS will send all emails to the email address Client provides to JHPFS. If an email notification is undeliverable, JHPFS will deliver the documents to Client's postal mail address of record and thereafter terminate Client's account.

Client assets invested in the Program will not be available for brokerage activities that are not directed by JHPFS, including but not limited to margin trading or trading securities by Client or any of Client's designated agents. If a Client initiates brokerage activity for the Program directly with TD Ameritrade, the Client may be charged a fee by TD Ameritrade and JHPFS will terminate its agreement with the Client.

Administrative and Platform Services Provided by Trizic

JHPFS has contracted with and pays Trizic (www.trizic.com) to utilize its digital advisory and technology platforms. Trizic is not an investment adviser or broker/dealer but works with investment advisory firms to implement web based, interactive investment advisory services. Trizic supports JHPFS by providing a customized website, website administration, risk questionnaire, portfolio implementation and rebalancing. Trizic also provides other functions related to the administrative tasks of managing client accounts. JHPFS pays Trizic out of the advisory fees it receives from clients.

Fees and Compensation

Clients will pay JHPFS a Program Fee. The Program Fee is deducted from the client's account at TD Ameritrade (the "Program Account") and paid directly to JHPFS. The Program Fee will be charged quarterly in arrears and will be debited from the client's Program Account at the beginning of each calendar quarter.

The Program Fee is calculated as follows:

- a. The balance in the Program Account at the end of each month in the prior calendar quarter is multiplied by the tiered Annual Program Fee set forth below and then divided by 12.
- b. The Program Fee for each of the three months in the prior calendar quarter is then added together and charged to the client at the beginning of the next calendar quarter.

If a Program Account is opened during a month, that month's Program Fee will be prorated for the number of days in the month that the Program Account was in existence. If the Program Account closes before the end of a month, the end of the month balance in the Program Account will be the balance in the Program Account at the close of business the day before the Program Account was closed for the purpose of determining the monthly Program Fee. The Program Fee for that month will be prorated for the number of days in the month the Program Account was in existence.

JHPFS's Program Fee schedule is as follows:

Asset Range	Annual Program Fee
\$0 to \$100,000	0.55%
Next \$150,000	0.45%
Over \$250,000	0.35%

Clients should review their account statements from TD Ameritrade and verify that the appropriate Program Fee has been deducted. JHPFS may in its sole discretion make exceptions to the fee schedule set forth above and negotiate different fees for certain clients.

The Program Fee covers investment advice, the ongoing management of the Program Accounts assets, as well as trade execution, clearance, settlement and custodial services provided by TD Ameritrade. The Program Fee does not cover the expenses of the ETFs in which the Program Account invests, including commission and other transaction-related charges ETFs incur.

The Program Fee does not cover certain execution costs that may be charged to Clients, including:

- (a) broker-dealer spreads and certain markups or markdowns paid to market makers;
- (b) transfer taxes;
- (c) fees charged by exchanges on a per transaction basis or other fees required by law;
- (d) any other fees that TD Ameritrade may charge, as may be outlined from time-to-time in TD Ameritrade's separate fee schedule; and
- (e) any other charges imposed by law or otherwise agreed to with regard to a Client's Program Account.

The Program Fee may cost a client more or less than purchasing such services separately

depending on several factors including the fees TD Ameritrade charges for custody and trading and the trading activity in a client's account.

MAM, the provider of recommended model portfolios, is affiliated with JHPFS and receives a portion of the Program Fee from JHPFS.

TD Ameritrade bills its fees, other than trade execution and custody fees, directly to the client's account. JHPFS does not receive any portion of such expenses or fees from the client or TD Ameritrade. In addition, clients may incur certain charges imposed by third parties, other than JHPFS, in connection with investments made through the client's Program Account including, but not limited to, 12b-1 fees and surrender charges, IRA and qualified retirement plan fees, and charges imposed by TD Ameritrade. The Program Fee is in addition to fees and expenses charged by ETFs that are held in a client's Program Account. All investments in ETFs are subject to the terms of each of the applicable prospectuses, including associated fees and operating fund expenses, which the client ultimately bears.

JHPFS may change the Program Fee including increasing the Program Fee at any time provided it notifies Client in writing thirty (30) days in advance. JHPFS may presume Client has consented to the change in the Program Fee if JHPFS has not received any written objection thereto from Client at the end of the 30 day period. In the event Client, during the 30 day period, notifies JHPFS of its objection to the Program Fee change, the change will not take effect and JHPFS may, at its option, terminate its advisory agreement with the client.

Item 5 – Account Requirements and Types of Clients

Account Requirements

Clients must meet the minimum investment amount for the Program. Currently, the minimum is \$25,000. If the market value of a Program account falls below the minimum investment amount, JHPFS reserves the right to terminate or suspend its services to the Program account. JHPFS may in its sole discretion make exceptions to the minimum investment amount for certain clients.

Clients will execute a written advisory agreement with JHPFS specifying the advisory services to be provided and under the terms of the agreement will agree to receive all account information and account documents (including this Brochure), and any updates to these documents, through their access to JHPFS's website and JHPFS electronic communications.

TD Ameritrade, Inc. ("TD Ameritrade"), the custodian of accounts in the Program, effects all transactions. The client must appoint JHPFS as its investment adviser of record on accounts in the Program at TD Ameritrade. TD Ameritrade maintains physical custody of all funds and securities in accounts in the Program. The client retains all rights of

ownership (e.g. right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the securities in its Program account.

Types of Clients

The Program is offered to the following types of clients:

Individuals

Individual Retirement Accounts (“IRAs”)

Business entities, government entities and accounts that are subject to the Employee Retirement Income Security Act of 1974 (“ERISA”) are not eligible for the Program.

Redemption Requests and Termination of an Account

Redemption requests must be received by 2 p.m. on a business day in order to be processed that day. Requests received after 2 p.m. will be processed on a best efforts basis. If the amount of the redemption is less than the available cash in the account, the available cash will be used to process the redemption. If the amount of the redemption is greater than the available cash in the account, securities in the account will be sold to satisfy the redemption request. The proceeds from the redemption request will be sent to the Client upon settlement of these trades which is typically three business days after trade date. All trades for an account including those for redemptions are sent to TD Ameritrade based on a randomized process in order to avoid favoring one account over another. Therefore, different accounts may not receive the same price per share for a particular ETF even for trades submitted on the same day.

JHPFS may terminate a client from the Program for any reason including having an account balance below the minimum investment amount and not providing JHPFS with information it has requested that is deemed necessary, or appropriate, to manage the Program account. JHPFS also may terminate a client from the Program if JHPFS deems the client’s requested investment restrictions to be unreasonable.

A client may terminate the Program upon written notice to JHPFS.

Upon termination of a Program account for a client, JHPFS will no longer provide the client with investment advisory services and the account will become an unmanaged brokerage account.

Item 6 – Portfolio Manager Selection and Evaluation

Selection of Portfolio Manager

JHPFS has selected itself as the portfolio manager in the Program. JHPFS has selected MAM

to create and maintain Models for the Program and to recommend ETFs to be included in the Models and the allocation of ETFs in a Model. JHPFS has a conflict in recommending an affiliate to perform these services because JHPFS and its affiliate will keep a larger share of the Program Fee than if JHPFS had selected a third party to create and maintain Models and select ETFs. JHPFS believes that MAM possesses the requisite expertise to serve in this capacity. JHPFS addresses this conflict through disclosure in this Brochure.

JHPFS reviews the performance of the investment strategies quarterly.

Performance-Based Fees and Side-By-Side Management

JHPFS does not receive performance-based fees for advisory services provided to clients. Therefore, JHPFS does not engage in side-by-side management of clients with performance based fees.

Methods of Analysis, Investment Strategies and Risk of Loss

JHPFS has created a number of investment strategies (Models) for the Program that consists of a diversified portfolio of ETFs. Each Model is designed to be consistent with a certain combination of investment strategies and risk tolerances. Additional Models may be added to the Program without prior notice to clients. JHPFS has entered into an agreement with MAM whereby MAM recommends Models for the Program including the investments to be included in the Models and the allocations among these investments. MAM will also provide ongoing review of the Models. The Models will consist primarily of ETFs.

Investing in the Models is subject to risks including:

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not indicative of future results. As with all investments, there is no assurance that any of the ETFs in the Program will achieve their investment objective and a client could lose money by investing in them.

Selection and Management Risk

Actively managed investment portfolios like the Program are subject to management risk. The securities or instruments in a Model may decline in value. Security or instrument selection risk may cause a Model to underperform other portfolios with similar investment objectives and investment strategies even in a rising market. Despite strategies to achieve positive investment returns regardless of general market conditions, the values of investments will change with market conditions, and so will the value of any investment in a Model. Investments in the Program could be lost or a Model could underperform other investments.

General Risks

Model Risks

JHPFS and MAM may use quantitative analyses and/or models to create or manage the Models. Any imperfections, limitations or inaccuracies in its analyses and/or models could affect its ability to implement investment strategies. By necessity, these tools make simplifying assumptions that may limit their effectiveness. Models that appear to explain prior market data can fail to predict future market events. Further, the data used in models may be inaccurate and/or it may not include the most current information available.

ETFs General Risks

ETFs in which the strategy may invest involve certain inherent risks generally associated with investments in a portfolio of securities, including the risk that the general level of security prices may decline, thereby adversely affecting the value of each unit of the ETF. Moreover, an ETF may not fully replicate the performance of its benchmark index because of the temporary unavailability of certain index securities in the secondary market or discrepancies between the ETF and the index as to the weighting of securities or the number of securities held. ETFs in which the strategies invest have their own fees and expenses as set forth in the ETF prospectuses.

ETFs may have exposure to derivative instruments, such as futures contracts, forward contracts, options, and swaps. There is a risk that a derivative may not perform as expected. The main risk with derivatives is that some types can amplify a gain or loss, potentially earning or losing substantially more money than the actual cost of the derivative, or that the counterparty may fail to honor its contract terms, causing a loss for the ETF. Use of these instruments may also involve certain costs and risks such as liquidity risk, interest rate risk, market risk, credit risk, management risk, and the risk that an ETF could not close out a position when it would be most advantageous to do so.

A particular ETF may be difficult to purchase or sell or may become difficult to sell after being purchased for a client account. JHPFS may be unable to sell ETFs on behalf of a client at an advantageous time and/or price due to then-existing trading market conditions.

Strategy Risk

In addition to the risks detailed herein, each ETF included in the Program is subject to investment risks that are unique to the specific investment strategy of the fund's manager, and disclosed in each fund's prospectus.

Market Risk

Equity and fixed income markets rise and fall daily. The performance of client investments is, to varying degrees, tied to these markets. When markets fall, the value of a client's

investments will fluctuate, which means a client could lose money. Events in the financial sector have resulted, and may continue to result, in an unusually high degree of volatility in the financial markets, both domestic and foreign.

Asset Allocation/Strategy/Diversification Risks

The asset classes in which an investment strategy in the Program seeks investment exposure can perform differently from each other at any given time (as well as over longer time periods), so the investment strategy will be affected by its allocation among the various asset classes. The asset allocation decisions can result in more portfolio concentration in a certain asset class or classes, which could reduce overall return if the concentrated assets underperform JHPFS's expectations. The more aggressive the investment strategy selected, the more likely the portfolio will contain larger weights in riskier asset classes, such as equities. Depending on market conditions, there may be times where diversified portfolios perform worse than less diversified portfolios.

Risks Related to the Use of Automated Investment Tools

There are risks associated with utilizing automated investment tools such as the Program, including the following risks:

- The investment tool uses certain economic assumptions that may not be updated in a timely manner or reflect shifts in the market.
- The output of the automated investment tool depends upon the accuracy of the information inputted into the investment tool.
- There may be certain factors or variables which have not been included in the automated investment tool. To the extent some questions are over-generalized, ambiguous or designed to fit a pre-determined option, the output may not reflect a particular client's needs or goals.
- By only using the automated investment service, clients may not receive individually tailored investment advice.

Cybersecurity Risk

Cybersecurity breaches may allow an unauthorized party to gain access to portfolio assets, client data, or proprietary information, or cause JHPFS or TD Ameritrade to suffer data corruption or lose operational functionality. Similar incidents affecting issuers of securities held by an ETF may negatively impact performance.

Underlying Securities Risk

Equity-Related Risks

General Risks. The price of equity securities may decline due to changes in a company's financial condition or overall market conditions. Growth company securities may fluctuate more in price than other securities because of the greater emphasis on earnings expectations. Securities the manager believes are undervalued may never realize their full potential value, and in certain markets value stocks may underperform the market as a whole.

Large Cap Risk. Larger companies may grow more slowly than smaller companies or be slower to respond to business developments. Large-capitalization securities may underperform the market as a whole.

Small and Mid Cap Risk. Small and mid-size companies are generally less established and may be more volatile than larger companies. Small capitalization securities may underperform the market as a whole.

Fixed Income-Related Risks

General Risks. A rise in interest rates typically causes bond prices to fall. The longer the average maturity or duration of the bonds held by an ETF, the more sensitive it will likely be to interest-rate fluctuations. An issuer may not make all interest payments or repay all or any of the principal borrowed. Changes in a security's credit quality may adversely affect fund performance.

High-Yield Risks. High-yield securities and unrated securities of similar credit quality (sometimes called junk bonds) are subject to greater levels of credit and liquidity risks. High-yield securities and the ETFs that invest in them may be considered speculative.

Government Securities Risk. Many U.S. government securities are not backed by the full faith and credit of the United States government, which means they are neither issued nor guaranteed by the U.S. Treasury. Certain issuers of securities, such as the Federal Home Loan Banks, maintain limited lines of credit with the U.S. Treasury. Securities issued by other issuers, such as the Federal Farm Credit Bank Funding Corporation, are supported solely by the credit of the issuer. There can be no assurance that the U.S. government will provide financial support to securities of its agencies and instrumentalities if it is not obligated to do so under law.

Foreign Investment-Related Risks

General Risks. Investments in securities of foreign issuers may involve certain risks that are greater than those associated with investments in securities of U.S. issuers. Less information may be publicly available regarding foreign issuers. Foreign securities may be subject to foreign taxes and may be more volatile than U.S. securities. Currency fluctuations

and political and economic developments may adversely impact the value of foreign securities.

Emerging Market Risk. The risks of investing in foreign securities are magnified in emerging markets. Emerging-market countries may experience higher inflation, interest rates, and unemployment and greater social, economic, and political uncertainties than more developed countries.

Currency Risk. Fluctuations in exchange rates may adversely affect the U.S. dollar value of a fund's investments. Foreign currencies may decline in value, which could negatively impact performance.

Geopolitical/Disruption-of-Markets Risks. Geopolitical events may adversely affect global economies and markets and thereby decrease the value of and/or the ease of trading the ETFs invested in those affected markets. Those events as well as other changes in foreign and domestic economic and political conditions could adversely affect the value of the strategy's investments.

Risks Related to Other Asset Classes

Commodity Risk. Commodity prices may be volatile due to fluctuating demand, supply disruption, speculation, and other factors. Certain commodity investments may have no active trading market at times.

Hard Asset Risk. The production and marketing of hard assets, such as precious metals, oil and gas, real estate and/or agricultural commodities may be affected by geopolitical and environmental factors and are cyclical in nature. During periods of economic or financial instability, hard asset securities and other instruments may be subject to broad price fluctuations, reflecting volatility of energy and basic material prices and possible instability of supply of various hard assets. Hard asset securities, hard asset companies, and other instruments may also experience greater price fluctuation than the relevant hard asset. In periods of rising hard asset prices, such securities or instruments may rise at a faster rate, and conversely, in time of falling hard asset prices, such securities may suffer a greater price decline.

Real Estate Risks. Real estate-related investments may be adversely affected by factors affecting the real estate industry, which may include changes in interest rates and social and economic trends. Real estate investment trusts ("REITs") may also be subject to the risk of fluctuations in income from underlying real estate assets, poor performance by the REITs' managers, prepayment and defaults by borrowers, adverse changes in tax laws, and, for U.S. REITs, their failure to qualify for the special tax treatment granted to REITs under the Internal Revenue Code of 1986 and/or to maintain exempt status under the Investment Company Act.

Limitations of Disclosure

The foregoing list of risks does not purport to be a complete enumeration or explanation of the risks involved in JHPFS's investment strategies. As JHPFS's investment strategies develop and change over time, clients and investors may be subject to additional and different risk factors. No assurance can be made that profits will be achieved or that substantial losses will not be incurred.

Voting Client Securities

JHPFS does not vote client proxies for investments in a client's account. Clients are responsible for exercising shareholder and other rights as owners of ETFs. JHPFS will not advise clients on the voting of proxies for investments held in their accounts. In addition, JHPFS will not advise clients on legal proceedings, including bankruptcies and class actions pertaining to investments in their accounts.

Item 7 - Client Information Provided to Portfolio Manager

Prior to enrolling in the Program, the client provides JHPFS with information about the client's investment time horizon, risk tolerance, age as well as other information and any reasonable restrictions applicable to the client's account in order that JHPFS may provide portfolio management services to the client.

Item 8 - Client Contact with Portfolio Manager

Clients who wish to contact JHPFS can do so by calling the phone number listed on the cover page or using the email option on the Program website.

Item 9 - Additional Information

Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of or the integrity of JHPFS or its management persons.

Other Financial Industry Activities and Affiliations

JHPFS is an indirect, majority-owned subsidiary of MFC and is directly owned by Manufacturers Investment Corporation. As such, JHPFS is affiliated with a number of investment advisers, investment companies, broker-dealers and insurance companies. Except as noted below, JHPFS does not believe that these relationships are material to JHPFS's advisory business.

MAM

MAM, an investment adviser that creates and maintains the Models for the Program and selects ETFs, is an affiliate of JHPFS.

Signator Investors, Inc.

Investment Adviser Representatives (“IARs”) of Signator Investors, Inc, an investment adviser and broker-dealer affiliated with JHPFS, may solicit clients for JHPFS.

Broker-Dealers

John Hancock Distributors LLC (“JHD”) is the distributor of the John Hancock Variable Insurance Trust (“JHVIT”), a no-load, open-end investment company that serves as the underlying investment medium for variable annuity and variable life contracts issued by John Hancock Life Insurance Company (U.S.A.) and affiliated entities. John Hancock Funds, LLC (“JHF, LLC”) is the distributor of all of the funds in the John Hancock Group of Funds advised by John Hancock Advisers, LLC (“JHA”), an affiliate of JHPFS. JHD and JHF, LLC are each related persons of JHPFS. JHF, LLC and JHD are broker-dealers registered with the SEC.

Investment Companies and Investment Advisers

As described above, JHA serves as investment adviser to the John Hancock Group of Funds, and John Hancock Investment Management Services, LLC (“JHIMS”), an affiliated investment adviser, serves as investment adviser to JHVIT. JHA and JHIMS are each related persons of JHPFS.

Insurance Companies

MFC is the sole owner of The Manufacturers Life Insurance Company, which is indirectly the sole owner of John Hancock Life Insurance Company (U.S.A.), which in turn wholly owns, directly or indirectly, a number of subsidiaries, including the following: The Manufacturers Investment Corporation, John Hancock Life Insurance Company of New York, John Hancock Financial Network, Inc. and The Berkeley Financial Group, LLC. John Hancock Financial Network, Inc. wholly owns Signator Investors, Inc.

John Hancock Life Insurance Company (U.S.A.) is also the majority owner of JHIMS and the indirect majority owner of JHA. The Berkeley Financial Group, LLC wholly owns a number of subsidiaries, including JHF, LLC, MAM, and certain other entities affiliated with MAM.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

JHPFS's Code of Ethics (the "Code") establishes standards of business conduct for JHPFS and its "Covered Employees" (which includes all officers and employees with access to non-public portfolio information) and all persons who provide investment advice, or are involved with the Program, on behalf of JHPFS and are subject to the supervision and control of JHPFS ("Supervised Persons").

The Code states that each Covered Employee is responsible for maintaining the very highest ethical standards when conducting company business. In general, JHPFS and its Covered Employees are required to (i) at all times place the interests of clients first; (ii) ensure that all personal securities transactions are conducted consistent with this Code and in such a manner as to avoid any actual or potential conflict of interest or any abuse of a position of trust and responsibility; (iii) not take inappropriate advantage of their positions or engage in manipulative practices such as front running or manipulative market timing; (iv) comply with all applicable federal securities laws; and (v) promptly report any violation of the Code to the Chief Compliance Officer ("CCO").

The Code is designed to prevent abuses in the investment advisory business that can arise when conflicts of interest exist between the employees of an investment adviser and its clients. When conflicting interests cannot be reconciled, the Code makes clear that, first and foremost, Covered Employees owe a fiduciary duty to John Hancock clients. The Code contains specific rules prohibiting defined types of conflicts. Since every potential conflict cannot be anticipated by the Code, it also contains general provisions prohibiting conflict situations.

The Code is also designed to permit JHPFS to monitor various securities transactions by Covered Employees, including those in shares of any mutual funds advised by JHPFS or an affiliate of JHPFS, in which they may have a direct or indirect beneficial ownership interest. Under the Code and subject to limited exceptions, Covered Employees must obtain the approval of the CCO before acquiring any covered security in an IPO or limited offering. However, any Covered Employee who participates in, or has prior knowledge of, purchase or sale recommendations made to a fund generally is prohibited from acquiring any covered security in an IPO.

The Code includes sections on policies in and outside the Code, reporting requirements and other disclosures inside and outside the Code, reporting violations, interpretation and enforcement, exemptions and appeals, education of employees and recordkeeping.

This Code will be provided to any client or prospective client upon request by contacting JHPFS at 844-328-2122.

JHPFS has also adopted an Amended and Restated Policy Statement and Procedures on Insider Trading in accordance with Section 204A of the Investment Advisers Act of 1940 which establishes procedures to prevent the misuse of material information by its officers, directors and employees. JHPFS and its related persons may, from time to time, come into possession of material nonpublic and other confidential information which, if disclosed, might affect an investor's decision to buy, sell or hold a security. Under applicable law, JHPFS and its related persons may be prohibited from improperly disclosing or using such information for their personal benefit or for the benefit of any other person, regardless of whether such other person is a client. Accordingly, should such persons come into possession of material nonpublic or other confidential information about any company, they may be prohibited from communicating such information to, or using such information for the benefit of, their respective clients, and have no obligation or responsibility to disclose such information to, nor responsibility to use such information for the benefit of, their clients when following policies and procedures designed to comply with law.

Participation or Interest in Client Transactions

From time to time, employees and principals of JHPFS or a related person may also invest or otherwise have an interest in securities owned by or recommended to JHPFS's clients.

Similarly, some or all of the financial services businesses under common control with JHPFS may invest in securities that are also owned by JHPFS's clients. Any of such persons may invest or otherwise have an interest, either directly or indirectly, in certain pooled vehicles, which, in turn, may invest in securities held in other managed accounts. As these situations may involve potential conflicts of interest, JHPFS has implemented policies and procedures relating to personal securities transactions and insider trading, that are designed to identify potential conflicts of interest, to prevent or mitigate actual conflicts of interest and to resolve such conflicts appropriately if they do occur.

Review of Accounts

JHPFS will periodically, but at least annually, ask clients via electronic channels to update the information they provided to JHPFS on its interactive website. Based on the updated information provided, JHPFS may change the Model a client has selected. Client is responsible for promptly notifying JHPFS of any change to Client's investment objectives, reasonable restrictions or other information that may affect the advisory services provided hereunder. Client understands that Client's failure to provide JHPFS with current, accurate information could adversely affect JHPFS's ability to effectively manage Client's account in the Program.

JHPFS associates and designees will also be available to discuss the Program during normal business hours.

Client Referrals and Other Compensation

JHPFS has entered into a solicitation agreement with an affiliate, Signator Investors, Inc., whereby Signator Investors, Inc. may refer clients who desire to utilize the Program to JHPFS. Signator Investors, Inc. does not receive additional compensation for such referrals.

Financial Information

JHPFS is not aware of any financial condition that is reasonably likely to impair its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy petition at any time during the past ten years.

JHPFS does not require or solicit prepayment of the wrap fee and is therefore not required to include a balance sheet for its most recent fiscal year.