

John Hancock Variable Trust Advisers LLC
(formerly, John Hancock Investment Management Services, LLC)
200 Berkeley Street
Boston, MA 02116
(617) 663-3000

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This Form ADV Part 2A Brochure provides information about the qualifications and business practices of John Hancock Variable Trust Advisers LLC (formerly John Hancock Investment Management Services, LLC), a Delaware limited liability company (“John Hancock Variable Trust Advisers”). If you have any questions about the contents of this Brochure, please contact us at (617) 663-3000. 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 John Hancock Variable Trust Advisers also is available on the SEC’s website at www.adviserinfo.sec.gov.

John Hancock Variable Trust Advisers is a registered investment adviser. Registration of an investment adviser does not imply a certain level of skill or training.

Item 2 – Material Changes

The following changes have been made to this brochure since its last annual update on March 28, 2019:

The name of the investment adviser has changed from John Hancock Investment Management Services, LLC to John Hancock Variable Trust Advisers LLC.

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Item 4 – Advisory Business

John Hancock Variable Trust Advisers is a limited liability company founded in 1997 and is an indirect 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 based in Toronto, Canada that trades as ‘MFC’ on the Toronto Stock Exchange, New York Stock Exchange (the “NYSE”), and the Philippine Stock Exchange, and under ‘945’ in Hong Kong.

John Hancock Variable Trust Advisers provides discretionary investment advisory services as a “manager of managers” to the John Hancock Variable Insurance Trust (“JHVIT” or the “Trust”), a no-load, registered 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 as well as several nonaffiliated insurance companies (each series of JHVIT is referred to herein as a “JHVIT fund” or a “Fund”).

Pursuant to the terms of investment advisory agreements with the Trust, John Hancock Variable Trust Advisers administers the business affairs of the Trust, negotiates and contracts with affiliated and unaffiliated sub-advisers (“Sub-Advisers”) that provide investment advisory services to individual portfolios of the Trust, and supervises the activities of the Sub-Advisers on behalf of the Trust, as further described herein. John Hancock Variable Trust Advisers is also responsible for performing or paying for various administrative services for the Trust, including providing office space and all necessary office facilities and equipment to perform its duties under the investment advisory agreements, and providing individuals who are directors, officers, or employees of John Hancock Variable Trust Advisers to serve (if duly elected or appointed) as Trustees and President of the Trust without remuneration from or other direct cost to the Trust. In addition, John Hancock Variable Trust Advisers allows the Trust to use the recognizable and valuable brand name, “John Hancock”.

The advisory agreement between a Trust and John Hancock Variable Trust Advisers may be terminated at any time, without the payment of a penalty, by the Board of Trustees of the Trust (the “Board”), by a vote of the majority of the outstanding voting securities of the Trust, or, with respect to any portfolio, by the Board or by the vote of a majority of the outstanding voting securities of the series of shares of such portfolio, on sixty days written notice to John Hancock Variable Trust Advisers, or by John Hancock Variable Trust Advisers, on sixty days written notice to the Trust. An advisory agreement will automatically terminate, without payment of any penalty, in the event of its assignment (as defined in the Investment Company Act of 1940, as amended (“1940 Act”)).

Description of Investment Advisory Services

The Investment Oversight team of John Hancock Variable Trust Advisers employs highly experienced and well-credentialed professionals. A large percentage hold advanced

degrees and leading certifications in business and finance.

Key advisory responsibilities include researching new investment products, asset classes, and investment managers, and monitoring the performance of investment managers on an ongoing basis.

As a manager of managers, John Hancock Variable Trust Advisers administers the business and affairs of the Trust, including the investment portfolios of the Funds, and retains, supervises, and compensates Sub-Advisers to manage the assets of the investment portfolios of the Funds. In its role as manager-of-managers, John Hancock Variable Trust Advisers has supervisory responsibility for managing the investment and reinvestment of the Fund's portfolio assets through proactive oversight and monitoring of the Sub-Advisers and the Fund. John Hancock Variable Trust Advisers is responsible for developing overall investment strategies for the Fund and overseeing and implementing the Fund's continuous investment programs and provides a variety of advisory oversight and investment research services. John Hancock Variable Trust Advisers also provides management and transition services associated with certain Fund events (e.g., strategy, portfolio manager or subadvisor changes) and coordinates and oversees services provided under other agreements. John Hancock Variable Trust Advisers has ultimate responsibility to oversee a Sub-Adviser and recommend to the Fund's Board its hiring, termination, and replacement. In this capacity, John Hancock Variable Trust Advisers among other things:

- (i) monitors on a daily basis the compliance of the Sub-Adviser with the investment objectives and related policies of the Fund;
- (ii) monitors significant changes that may impact the Sub-Adviser's overall business and regularly performs due diligence reviews of the Sub-Adviser;
- (iii) reviews the performance, and monitors the liquidity, of the Sub-Adviser; and
- (iv) reports periodically on such performance to the Board.

John Hancock Variable Trust Advisers employs a team of investment professionals who provide these ongoing research and monitoring services.

Pursuant to an order from the SEC, John Hancock Variable Trust Advisers, subject to Board approval, is permitted to appoint a new Sub-Adviser for a Fund, or change the terms of a sub-advisory agreement, without obtaining shareholder approval. The SEC order does not, however, permit John Hancock Variable Trust Advisers to appoint a Sub-Adviser that is an affiliate of John Hancock Variable Trust Advisers or of the relevant JHVIT fund (other than by reason of serving as Sub-Adviser), or to increase the sub-advisory fee of an affiliated Sub-Adviser without shareholder approval.

The John Hancock Variable Trust Advisers team of professionals is responsible for the selection of Sub-Advisers and monitoring Sub-Adviser performance. The team closely monitors each sub-advised portfolio on a daily, monthly, quarterly and annual basis. Team members periodically visit each Sub-Adviser to perform due diligence on the advisory services provided by the Sub-Adviser, as well as the business and compliance

operations of the Sub-Adviser. John Hancock Variable Trust Advisers recommends to the Board the continuation or termination of the sub-advisory agreements at least annually.

The process for selecting new Sub-Advisers involves the use of screening models with and in-depth data analysis as well as the industry knowledge of the members of the investment team. A rigorous five-step process is used in selecting Sub-Adviser candidates:

- (i) initial screening by investment style;
- (ii) firm review to identify managers who demonstrate the highest potential to produce above average results;
- (iii) quantitative analysis of performance;
- (iv) qualitative analysis of the investment team, philosophy, process and risk management practices through in-person interviews; and
- (v) final selection, based on management review of the investment team's findings and the capacity of the Sub-Adviser and the liquidity of the new fund.

New Sub-Advisers are also reviewed by the Manulife Global Investment Product Committee.

Sub-Advisers that are selected by John Hancock Variable Trust Advisers are generally required to adhere to pre-established value propositions. In monitoring the Sub-Advisers, John Hancock Variable Trust Advisers generally focuses on longer-term performance rather than short-term performance metrics. Although a Sub-Adviser's performance record is one of several factors used to determine whether a Sub-Adviser should be retained or replaced, a full due diligence review of a Sub-Adviser will be conducted if:

- (i) value proposition criteria are violated;
- (ii) performance is not aligned with the performance blueprint;
- (iii) the Sub-Adviser experiences major organizational changes such as resignations or a change in ownership; or
- (iv) the fund's risk profile is outside of expectations.

During a full review of a Sub-Adviser, John Hancock Variable Trust Advisers focuses on identifying and assessing the issue that has caused the full review to be undertaken. If John Hancock Variable Trust Advisers determines that the Sub-Adviser can no longer deliver its value proposition to the JHVIT fund and its shareholders, a recommendation will be made to the Board to replace the Sub-Adviser.

Further information regarding John Hancock Variable Trust Advisers' screening, supervision, and review of Sub-Advisers is described in Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.

In the event of the replacement of a Sub-Adviser or the merger of one or more JHVIT funds, John Hancock Variable Trust Advisers manages the transition or merger transaction of the relevant Fund's portfolio investments to the new Sub-Adviser in an

effort to minimize transaction costs and avoid other implicit costs. This involves the development of strategic plans to execute all fund events (e.g., fund launches, mergers, and liquidations), taking into consideration downstream impacts on services provided to the Funds by global business units, in coordination with legal, compliance, tax, product, operations, and other business units of John Hancock Variable Trust Advisers or its affiliates, and with the fund's Sub-Adviser(s).

The Trust has established "Fund of Funds" which invest in a number of other underlying funds and may invest in certain other types of investments. John Hancock Variable Trust Advisers is responsible for oversight of the Fund of Funds, including the monitoring of the asset allocation strategies and processes employed by the Sub-Adviser of such funds. John Hancock Variable Trust Advisers and its Trade Oversight Committee also oversees rebalancing of the funds' assets, and has adopted procedures to help minimize any negative impact of rebalancings on the underlying funds. John Hancock Variable Trust Advisers also has the authority, with Board approval, to manage a Fund of Funds directly and, in that case, would be responsible for implementing asset allocation strategies, including by rebalancing the Fund of Fund's underlying funds to maintain target allocations. It is not the current practice of John Hancock Variable Trust Advisers to exercise this authority in the normal course of business. Certain Fund of Funds warrant focused monitoring by John Hancock Variable Trust Advisers, which includes evaluating the Sub-Adviser's asset class mix and manager mix decisions, determining the effectiveness of the optimization process, and monitoring cash flows and trading efficiencies.

John Hancock Variable Trust Advisers develops and provides detailed reports for the Board of the Trust on a regular basis. These reports include performance and liquidity data, due diligence information and compliance reports, based on John Hancock Variable Trust Advisers' ongoing portfolio and Sub-Adviser monitoring activities. John Hancock Variable Trust Advisers also prepares ad hoc reports and consults with Investment and Compliance Committees established by the Boards to monitor Sub-Adviser performance and assists these committees in the preparation of performance reports to the full Board.

John Hancock Variable Trust Advisers also oversees the John Hancock family of funds inter-fund lending program, and the management by Sub-Advisers of overnight cash held by the Funds.

John Hancock Variable Trust Advisers has a committee governance structure that provides oversight of certain of the services John Hancock Variable Trust Advisers provides to the Funds. The services overseen by the John Hancock Variable Trust Advisers committees include investment, operational, legal, compliance, risk oversight, disclosure oversight and proxy voting. Each of the John Hancock Variable Trust Advisers Committees is listed below.

1. Risk and Investment Operations ("RIO") Committee
2. Trade Oversight Committee
3. Complex Securities Committee

4. Multi-Manager and Multi-Style Funds Investment Oversight Committee
5. Service Provider Oversight Committee
6. Disclosure Review Committee
7. Proxy Voting Committee
8. Liquidity Risk Management Committee
9. Investment Risk Oversight Committee
10. Accounting Policies Committee
11. Ethics Oversight Committee

Compliance Support and Oversight

John Hancock Variable Trust Advisers also provides the John Hancock Funds with ongoing compliance support and oversight through programs designed to ensure that there are adequate procedures in place to deter, detect, correct, and report on control weaknesses that could potentially result in a violation of Federal securities laws. This program is administered pursuant to the requirements of Rule 206(4)-7 of the Investment Advisers Act of 1940 (the “Advisers Act”) and is managed by John Hancock Variable Trust Advisers’s duly appointed Chief Compliance Officer (“CCO”).

The role of the CCO and the Compliance Office (“CCO’s Office”) is to: (a) develop and monitor a compliance program for John Hancock Variable Trust Advisers based on an on-going review of risk and current legal and regulatory developments; (b) oversee and manage compliance issues; (c) ensure that John Hancock Variable Trust Advisers complies with the applicable legal and regulatory requirements; and (d) that the John Hancock Variable Trust Advisers employees comply with internal policies and procedures. These responsibilities include: designing and overseeing the appropriate implementation of policies and procedures to reasonably assure compliance with applicable federal securities laws and regulations; providing employee training on certain key policies such as Code of Ethics, Insider Trading, Gifts and Entertainment and the Whistleblower Policy; managing and/or participating in investigations into regulatory and compliance issues; and responding to requests for information from regulatory authorities.

In carrying out this role, the CCO’s Office has developed a compliance oversight program designed to reasonably ensure that the requirements imposed by federal securities laws are implemented effectively throughout John Hancock Variable Trust Advisers and by its third-party service providers, including the Sub-Advisers to the Funds. The Compliance Program involves four main components: (1) development and maintenance of policies and procedures; (2) risk assessments; (3) policy review and evaluation and (4) Sub-Adviser and service provider oversight (“Service Provider Oversight”).

Development and Maintenance of Policies and Procedures

The CCO’s Office, in conjunction with John Hancock Variable Trust Advisers’s business units, has developed policies and procedures that address the regulatory risks that are

associated with John Hancock Variable Trust Advisers' operation. In addition, these policies include procedures that address the manner in which the CCO's office will oversee the compliance and internal control programs implemented by the Sub-Advisers and service providers. These policies and procedures are evaluated on at least an annual basis by the CCO's Office, in conjunction with John Hancock Variable Trust Advisers's business units, with all material changes requiring CCO's Office and Board of Directors approval. The CCO's Office, in conjunction with John Hancock Variable Trust Advisers's business units, develops compliance policies as new regulations become effective and continually evaluates and amends existing policies as necessary.

Risk Assessment

The risk assessment process is a key component of the Compliance Program as it provides an indication of the potential risk associated with each compliance policy and procedure. The risk assessment process is designed to evaluate the effectiveness of the procedures supporting the underlying policies. In conjunction with each John Hancock Variable Trust Advisers business unit, the CCO's Office conducts a quantitative, risk-based assessment of the organization's risk through a review of both inherent and residual risk. Inherent risk is an assessment of the risk of the requirement itself, independent of any operational and/or supervisory controls which are in place. It takes into account where the origin of the requirement is from (i.e. regulatory guidance, SEC rule, etc.), the potential magnitude of non-compliance (e.g. inconsequential or material) and the reputational risk of noncompliance. At the conclusion of the "inherent" risk assessment, a "control maturity" risk assessment is completed which involves an evaluation of the effectiveness of the operating control environment. Residual risk is a product of the inherent and control maturity risk scores and ultimately is representative of the remaining business risk based on existing operational and supervisory controls.

Policy Review and Evaluation

After assessing the risk environment, the CCO's Office then focuses on testing the compliance program's effectiveness. This is conducted through a series of tests that are centered on the operational and control environment that supports the Compliance Policies. In conducting the testing, the CCO's Office, in conjunction with John Hancock Variable Trust Advisers' business units, prepares detailed test scripts which are designed to test the key activities/controls of each process. Once these test scripts are prepared, the CCO's Office, working with John Hancock Variable Trust Advisers' business units, conducts testing on the effectiveness of the control environment. At the conclusion of the testing, the CCO's Office prepares reports for Senior Management which summarizes the results of the process.

Sub-Adviser and Service Provider Oversight

The CCO's Office has established a standardized approach for assessing all Sub-Adviser compliance programs. For prospective Sub-Advisers and prior to any onsite due diligence visit, each Sub-Adviser is asked to provide a response to a preliminary questionnaire which is then utilized by the CCO's Office as the initial step in fulfilling its oversight responsibilities. These narratives are reviewed for adequacy, comprehensiveness and completeness.

The CCO's Office also requires that each Sub-Adviser complete a due diligence questionnaire and provide additional documentation (e.g. Compliance Manuals, Code of Ethics, etc.) on the firm's processes, controls, and policies in place to address the requirements of the 1940 Act, the Advisers Act, and other federal securities laws. Responses to these questions are then reviewed by the CCO's Office to assist in determining the adequacy of the Sub-Advisers' compliance programs. The responses and requested documents are reviewed before the visit in order to establish a preliminary understanding of the internal controls in place.

In addition, Sub-Adviser evaluation by the CCO's Office includes onsite due diligence visits. A typical onsite visit to a Sub-Adviser includes sessions with representatives from Legal, Compliance, Trading, Operations, Fund Management and the Chief Compliance Officer. The results of onsite visits are documented and then reviewed with senior management of John Hancock Variable Trust Advisers and the Funds' Board of Trustees. If the CCO's Office is not satisfied with the Sub-Advisers' compliance program, the Sub-Adviser will not be approved to sub-advise a John Hancock Fund.

The CCO's Office utilizes a similar approach for the ongoing oversight of its Sub-Advisers once they are approved to sub-advise a John Hancock Fund. The CCO's Office continues to conduct on-site due diligence meetings on a prescribed schedule. In addition, the CCO's Office monitors the compliance programs of the Sub-Advisers on an ongoing basis by requiring the completion of quarterly, annual and periodic compliance questionnaires, quarterly certifications concerning adherence to prospectus guidelines and disclosures as well as annual certification of the Sub-Advisers' Code of Ethics. Further, the CCO's Office oversees the monitoring of the investment activities of the Sub-Advisers on a daily post trade basis to ensure that each portfolio investment is in compliance with prospectus guidelines and other regulatory requirements.

Service Provider Oversight is similar to the oversight performed for Sub-Advisers, but incorporates additional techniques based upon information which is generally available. The goal of the oversight performed by the CCO's Office and John Hancock Variable Trust Advisers' Fund Administration department is to ensure that the Funds' service providers have satisfactory operational controls and that the service providers are fulfilling their fiduciary and contractual obligations.

The Global Wealth and Asset Management Vendor Management Group ("Vendor Management") maintains a framework that includes, but is not limited to, the following processes:

1. Due diligence questionnaires – The due diligence questionnaires are used to gather current information on topics such as financial viability, results of regulatory reviews, business continuity programs, information security, business code of conduct issues and a number of other topics, to gain a better understanding of each provider's overall control environment and risk monitoring process.

2. On-site visits of the service provider – This allows the CCO’s Office, Fund Administration, and Vendor Management to make on-site observations as to the adequacy of the internal operational control environment, and provides a forum to discuss the results of independent assurance tests, operational and performance issues and provides the service provider with an opportunity to present future key initiatives.
3. Independent attestation report reviews – Vendor Management reviews the results of these reports to confirm that the controls are adequate, complete and operating as intended. These reports may be in the form of SOC-1 Reports, agreed-upon procedures or other similar reports. For those service providers that provide these reports, Vendor Management obtains copies, and performs a detailed review to assess the adequacy, scope and completeness of the testing. The CCO’s Office and Vendor Management evaluate the implications of the results of the testing to form a basis for determining the effectiveness of the internal control environment.
4. Monthly operational report reviews – Vendor Management obtains and reviews monthly operational management reports that are prepared by the service provider and shared with the management of John Hancock. The purpose of reviewing these reports is to ensure that operational processes are performing as intended, confirm Key Performance Indicators (KPI) are reported accurately, and identify areas which require further discussion or explanation from the service provider.
5. Service Provider Scorecards – otherwise known as Performance Evaluations, are used for key service providers to ensure that the services being provided to John Hancock continue to meet expectations. Vendor Management facilitates the scorecard process by obtaining feedback from the business owners on a regular basis and providing that feedback to the vendor in a formal performance scorecard.

John Hancock Variable Trust Advisers is advised by internal and external legal counsel in connection with general investment company governance, exemptive applications and SEC no-action letters drafted and filed on its behalf, dissolutions of subsidiaries, and mergers and acquisitions. Legal counsel services are provided to John Hancock Variable Trust Advisers in connection with the investment advisory services John Hancock Variable Trust Advisers provides to the Funds related to new and existing products, acquisitions of mutual fund assets, determinations of fee breakpoints and valuations. John Hancock Variable Trust Advisers also receives legal counsel related to proxy materials, tax reporting and communications, and preparation of 15(c) material for review by the Fund’s board of trustees.

John Hancock Variable Trust Advisers provides services to the Trust related both to any litigation against JHVIT or the JHVIT funds and litigation that JHVIT or the JHVIT funds may initiate. John Hancock Variable Trust Advisers regularly monitors class actions related to securities held by the JHVIT funds and provides support for the JHVIT

funds to join such class actions where appropriate.

As of December 31, 2019, John Hancock Variable Trust Advisers has more than 204 professionals dedicated to its manager of manager services, including professionals in investments, legal, fund administration, compliance and code of ethics oversight.

Wrap Fee Programs

John Hancock Variable Trust Advisers does not provide portfolio management services to any wrap fee programs.

Assets Under Management

As of December 31, 2019, John Hancock Variable Trust Advisers managed approximately \$76,793,779,035 of assets on a discretionary basis including fund of funds in the Trust. John Hancock Variable Trust Advisers does not provide continuous and regular supervisory or management services on a non-discretionary basis.

Item 5 – Fees and Compensation

Advisory and sub-advisory fees charged to each of the Funds are based on a percentage of assets under management, and are paid daily to John Hancock Variable Trust Advisers by each fund. The advisory fees charged by John Hancock Variable Trust Advisers to the funds in the Trust range from 0.37% to 1.05% of assets under management. Sub-advisory fees are calculated daily and paid monthly to the Sub-Adviser of each fund. Sub-advisory fees are negotiated at arms' length. In addition, JHVIT may benefit from a complex-wide fee waiver that is triggered by reaching certain asset levels. The advisory fees, as well as further information regarding the calculation and payment of such fees, are set forth in the currently effective registration statement of each JHVIT fund.

The JHVIT funds typically pay John Hancock Variable Trust Advisers to provide administrative and legal services to the JHVIT funds based on the cost of providing such services (including an allocation of overhead). In addition to advisory fees and administrative fees charged by John Hancock Variable Trust Advisers, The JHVIT funds pay other expenses such as qualified custodian fees, external auditor fees and transfer agency fees.

Compensation from Affiliated Entities

As a manager of managers, John Hancock Variable Trust Advisers retains, supervises, and compensates Sub-Advisers to manage the assets of the investment portfolios of the JHVIT funds. In this capacity, John Hancock Variable Trust Advisers may perform research and due diligence on affiliated investment advisers as well as non-affiliated investment advisers. When John Hancock Variable Trust Advisers selects an affiliated investment adviser as a Sub-Adviser to a Fund, management fees paid to the Sub-Adviser

flow indirectly to John Hancock Variable Trust Advisers' parent companies. These fees are in addition to the advisory fees paid to John Hancock Variable Trust Advisers. Likewise, when a Fund that is a Fund of Funds invests in other JHVIT funds, fees and other compensation flow directly or indirectly to John Hancock Variable Trust Advisers and its affiliates in the form of additional management fees and administrative fees. Broker-dealers and insurance companies affiliated with John Hancock Variable Trust Advisers also receive 12b-1 fees and/or shareholder servicing fees based on the amount of assets invested in share classes of the funds that provide for such fees. In addition, several JHVIT funds re-invest collateral from securities lending activities in a fund managed by an affiliate of John Hancock Variable Trust Advisers. The amount of fees and other compensation paid by the JHVIT funds to John Hancock Variable Trust Advisers and its affiliates varies, and is described in the prospectus of each JHVIT fund.

In addition, several JHVIT funds invest collateral from securities lending activities in John Hancock Collateral Trust (the "Collateral Trust") advised by John Hancock Investment Management LLC and subadvised by Manulife Investment Management (US), an affiliate of John Hancock Variable Trust Advisers. Manulife Investment Management (US) receives subadvisory fees for managing the Collateral Trust. Also, several JHVIT funds subadvised by Manulife Investment Management (US) and Manulife Investment Management (North America) Limited, may sweep excess overnight cash into the Collateral Trust.

In addition, John Hancock Variable Trust Advisers personnel may be invested personally in the JHVIT funds through the purchase of variable insurance contracts.

In light of these circumstances, John Hancock Variable Trust Advisers has a conflict of interest to the extent it has an incentive to provide more favorable research and analysis with respect to affiliated investment managers based on the fact that John Hancock Variable Trust Advisers and its affiliates will receive compensation or other benefits if affiliated investment managers are selected as Sub-Advisers for the JHVIT funds. These conflicts are described in Item 10 – Other Financial Industry Activities and Affiliations. In recommending Sub-Advisers for the JHVIT funds, John Hancock Variable Trust Advisers endeavors to utilize its best independent judgment as part of its overall evaluation process described above.

Item 6 – Performance-Based Fees and Side-By-Side Management

John Hancock Variable Trust Advisers does not receive performance-based fees for advisory services provided to clients. Therefore, John Hancock Variable Trust Advisers does not engage in side-by-side management of clients with performance-based fees.

Item 7 – Types of Clients

John Hancock Variable Trust Advisers provides discretionary investment advisory services as a “manager of managers” to the JHVIT funds.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

John Hancock Variable Trust Advisers does not directly offer advice on specific investments. Instead, John Hancock Variable Trust Advisers contracts with and reviews the performance of Sub-Advisers that provide investment management services to the JHVIT funds. Security analysis is performed and methods of analysis are selected by the Sub-Advisers, which use investment strategies determined appropriate, subject to supervision by John Hancock Variable Trust Advisers and the Board, if applicable, to achieve the investment objectives set forth in the investment guidelines of the applicable fund.

Research of New Investment Products, Asset Classes, and Investment Managers

John Hancock Variable Trust Advisers consults with the Trust and, on behalf of the Trust, with various affiliated business units to determine investment needs of existing and proposed JHVIT funds, identify opportunities for new products and asset classes, and develop appropriate solutions. Topics of consultation may include fund launches, fund adoptions, manager replacements, and changes to the investment strategies of existing products (“Product Changes”) and other corporate actions. To generate ideas, John Hancock Variable Trust Advisers conducts market, industry, and competitive research. This process involves:

- monitoring sales and industry trends; identifying investment products that are gaining market acceptance, analyzing market share (by distribution channel and fund category), examining new product launches, and conducting product gap analysis to identify potential areas for new products or product features;
- utilizing asset manager relationships, researching market publications, and conducting external manager research to inform research into potential new asset classes;
- conducting research related to partnership and acquisition opportunities, including Sub-Adviser searches and fund adoptions; and
- analyzing data from third-party vendors, including Morningstar, FactSet, Bloomberg, and Lipper.

The Manulife Global Investment Product Committee approves the decision to develop

any new product or any Product Changes.

In addition to conducting research to identify new opportunities, John Hancock Variable Trust Advisers also collaborates with affiliated business units to implement Product Changes. This includes working with internal and external legal counsel, fund administration, tax, and compliance to coordinate all Product Changes on behalf of the Trust. In doing so, John Hancock Variable Trust Advisers coordinates compliance with the 1940 Act, the IRS, ERISA, CFTC and SEC and other related regulations and requirements.

Initial Screening of Sub-Advisers

To identify appropriate Sub-Advisers for the JHVIT funds, John Hancock Variable Trust Advisers utilizes an extensive screening process, which involves both the review of the Sub-Adviser and the particular individuals or investment team proposed to manage the fund. The Sub-Adviser selection and review process consists of the following five steps:

- **Initial Screening:** John Hancock Variable Trust Advisers runs preliminary screens by investment style, and leverages the industry knowledge of the analyst team to determine which portfolios and asset management firms manage an investment strategy that would meet the desired solution and have performed well over time versus their peers.
- **Firm Review:** John Hancock Variable Trust Advisers identifies managers it believes demonstrate the highest probability of producing above average results for clients. The focus is typically on established firms with sizeable assets under management that are best positioned to recruit and retain experienced and talented portfolio managers, access wider resources to help make well-researched investment decisions, and capitalize on proven economies of scale when buying and selling securities. At times, John Hancock Variable Trust Advisers has identified and hired smaller, boutique firms that provide unique investment capabilities.
- **Quantitative Analysis:** Once the field of potential Sub-Advisers has been narrowed, John Hancock Variable Trust Advisers conducts extensive quantitative analysis. John Hancock Variable Trust Advisers analyzes each portfolio's style by examining returns-based style analysis, including the historical measures of R-squared (*i.e.*, the degree to which the portfolio's performance has can be explained by the benchmark), active share, tracking error, and portfolio holdings. This provides an initial view of a potential Sub-Adviser's investment style biases. After investment style has been analyzed, John Hancock Variable Trust Advisers reviews performance in greater depth. It evaluates the fund's performance attribution through various classification groups (*i.e.*, sector, market cap, region, factor), volatility characteristics using measures such as standard deviation, upside/downside capture, Sharpe Ratio (*i.e.*, a measure of risk-adjusted performance) and Information Ratio (*i.e.*, a measure of the manager's ability to

generate consistent excess returns relative to a benchmark). This allows John Hancock Variable Trust Advisers to gain deeper insight into the strengths and weaknesses of a particular manager, and to understand its overall “performance blueprint” and investment capacity as well as the liquidity of its investments.

- **Qualitative Analysis:** In conjunction with quantitative analysis, John Hancock Variable Trust Advisers conducts in-depth manager interviews to verify its initial findings and uncover vital information that can only be determined face-to-face. During the interview, John Hancock Variable Trust Advisers focuses on the stability of the organization (*i.e.*, whether John Hancock Variable Trust Advisers believes it can maintain the culture and environment that has made it successful), the quality of people managing the money and the firm, investment philosophy and process, risk management, portfolio construction, investment capacity, liquidity of securities to be purchased by the manager, and the performance of the strategy. The ultimate goal of John Hancock Variable Trust Advisers’ approach is to define the most prominent aspects of the manager’s value proposition. Value propositions define an investment strategy’s essential purpose and what makes it unique. They are the key to a strategy’s past success and the link to future success. John Hancock Variable Trust Advisers believes that value propositions must be observable or measurable, and requires that each Sub-Adviser ultimately agree that violating its value proposition(s) will lead to a review and possible replacement.
- **Final Selection:** At the end of this process, John Hancock Variable Trust Advisers will generally identify candidates that are strong contenders for ultimate selection. John Hancock Variable Trust Advisers reviews these potential Sub-Advisers with the Manulife Global Investment Product Committee to reach a final decision to retain one or more of the candidates as Sub-Advisers.

Ongoing Reviews

Once a Sub-Adviser is hired to manage a Fund, John Hancock Variable Trust Advisers performs continuous monitoring to ensure it meets value propositions and performance expectations. This review includes not only the monitoring of the performance of the Fund but also a review of the Sub-Adviser’s overall operations to ensure that the business affairs of the Sub-Adviser remain sound.

John Hancock Variable Trust Advisers closely monitors every investment portfolio on a daily, monthly, quarterly and annual basis. John Hancock Variable Trust Advisers believes that this level of ongoing review is essential for determining whether a Fund continues to have the ability to meet its performance expectations. As part of this monitoring process, John Hancock Variable Trust Advisers develops and maintains sophisticated performance reporting systems. These systems deliver Fund-level performance data for the investment platforms. In addition, the team creates and reviews detailed performance attribution packages, including all asset allocation products.

John Hancock Variable Trust Advisers team members periodically make due diligence visits to each Fund Sub-Adviser (generally once a year). These meetings are preceded by an in-depth due diligence questionnaire that is completed by the Sub-Adviser detailing organizational, investment, and performance related matters. In addition to performance review discussions with portfolio managers, other topics addressed in a due diligence review may typically include business updates and discussions of risk management practices with senior management.

Ongoing monitoring and/or due diligence reviews may typically include, as appropriate:

- a review of the background of each of the Sub-Adviser's portfolio managers and analysts;
- a review of the Sub-Adviser's use of derivatives and other complex investment instruments and strategies; any change in the Sub-Adviser's strategy regarding the use of derivatives and complex securities is reviewed and reported to the Board;
- an in-depth review of the Sub-Adviser's strategy for managing investment-related risk, including the Sub-Adviser's handling of liquidity issues as they relate to individual securities; and
- involvement of John Hancock Variable Trust Advisers' CCO and/or his staff in the due diligence review of a Sub-Adviser's business operations and risks.

John Hancock Variable Trust Advisers maintains detailed due diligence reports for all JHVIT funds, provides detailed due diligence information to the Board with respect to each JHVIT fund and its Sub-Adviser(s), and assists the Investment, Audit and Compliance committees established by the Board to monitor Sub-Adviser performance.

Risk of Loss

An investment in a fund is not a bank deposit and is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency. Investing in funds involves risk of loss that clients should be prepared to bear. Many factors affect performance, and past performance is not indicative of future results. Fund shares will fluctuate in price, meaning investors in the JHVIT funds could lose money by investing in such funds. As with the managers of all investment funds, there is no assurance that any of the Sub-Advisers analyzed by John Hancock Variable Trust Advisers will achieve their investment objective, and a fund's investment strategy may not produce the intended results. During periods of heightened market volatility or reduced liquidity, governments, their agencies, or other regulatory bodies, both within the United States and abroad, may take steps to intervene. These actions, which could include legislative, regulatory, or economic initiatives, might have unforeseeable consequences and could adversely affect a fund's performance or otherwise constrain a fund's ability to achieve its investment objective.

Multi-Manager Risk; Limited Universe of Sub-Advisers and Underlying Funds

The investment styles employed by the managers of underlying funds of JHVIT funds that are funds of funds may not be complementary. The ability of Funds of Funds to achieve their investment objectives depends upon the Sub-Advisers' skill in determining such fund's strategic allocation to investment strategies and in selecting the best mix of underlying funds. The allocation of investments among the different Sub-Advisers managing underlying funds with different styles and asset classes, such as equity, debt, U.S., or foreign securities, may have a more significant effect on the performance of a Fund of Funds when one of these investments is performing more poorly than the other. The underlying funds selected by a Sub-Adviser for the portfolio of a Fund of Funds may underperform the market generally or other funds that could have been selected for the portfolio.

There is no assurance that allocation decisions will result in the desired effects. Investment decisions made by a Sub-Adviser may cause a Fund of Funds to incur losses or to miss profit opportunities on which it might otherwise have capitalized. Moreover, at times, a Sub-Adviser may invest fund assets in underlying funds managed by a limited number of Sub-Advisers. In such circumstances, the Fund of Fund's performance could be substantially dependent on the performance of these Sub-Advisers. Similarly, the Sub-Adviser's allocation of a Fund of Fund's assets to a limited number of underlying funds may adversely affect the performance of the fund of funds, and, in such circumstances, it will be more sensitive to the performance and risks associated with those funds and any investments in which such underlying funds focus.

Affiliated Sub-advised fund conflicts of interest risk

The Sub-Adviser may allocate a fund's assets without limit to underlying funds managed by the Sub-Adviser and/or other Affiliated Sub-Advisers (affiliated sub-advised funds). Accordingly, rebalancings of the assets of a fund present a conflict of interest because there is an incentive for the Sub-Adviser to allocate assets to the Sub-Adviser and other affiliated sub-advised funds rather than underlying funds managed by unaffiliated sub-advisers. In this regard, the Sub-Adviser and other Affiliated Sub-Advisers of affiliated sub-advised funds benefit from the Sub-Adviser's allocations of fund assets to such funds through the additional subadvisory fees they earn on such allocated fund assets. The subadvisor has a duty to allocate assets only to underlying funds it has determined are in the best interests of shareholders, and make allocations to affiliated sub-advised funds on this basis without regard to any such economic incentive. As part of its oversight of the funds and the Sub-Advisers, John Hancock Variable Trust Advisers monitors to ensure that allocations are conducted in accordance with these principles.

Risks Related to the Use of Quantitative Models (also known as algorithms) to Manage Certain JHVT Funds

Certain JHVT Funds may be managed based on quantitative models, which are commonly referred to as algorithms. There are risks associated with utilizing quantitative models to manage funds, including, without limitation, the following:

- The successful application of a quantitative model is dependent on the adviser's skill in building and implementing the model.
- Quantitative models generally use certain economic assumptions that may not be updated in a timely manner or reflect shifts in the market, and may not accurately predict future market movements or characteristics due to the fact that market performance can be affected by nonquantitative factors that are not easily integrated into quantitative analysis, among other factors.
- The use of quantitative models may affect a portfolio's exposure to certain sectors or types of investments, notwithstanding whether such sectors or investments are in or out of favor in the market.
- The output of the quantitative model depends upon the accuracy of the information input into the investment tool.
- There may be certain factors or variables which have not been included in the quantitative model. To the extent some questions are over-generalized, ambiguous or designed to fit a pre-determined option, the output may not reflect needs or goals of the fund relying on the output.
- Quantitative models may have errors, omissions, imperfections and malfunctions, and human judgment plays a role in building, utilizing, testing, modifying, and implementing the financial algorithms and formulas used in these models. Errors in the models may be difficult to detect and may go undetected for long periods of time and some errors may never be detected. While this risk may be mitigated by testing, there is no assurance that the algorithm will always work as intended.
- Quantitative models are subject to technical issues including programming and data inaccuracies, are based on assumptions, and rely on data that is subject to limitations (e.g., inaccuracies, staleness), any of which could adversely affect their effectiveness or predictive value.

In addition, quantitative modeling may rebalance a fund based on factors other than just market conditions and may rebalance on a more frequent basis than non-algorithmically created funds.

Securities Lending Risk

If a borrower of a Fund's securities fails financially, the fund's recovery of the loaned securities may be delayed or the fund may lose its rights to the collateral, which could result in a loss to the fund. While securities are on loan, a fund is subject to several risks, including: the risk that the borrower may default on the loan and that the collateral could be inadequate in the event the borrower defaults, the risk that the earnings on the collateral invested may not be sufficient to pay fees incurred in connection with the loan, the risk that the principal value of the collateral invested may decline and may not be

sufficient to pay back the borrower for the amount of the collateral posted, the risk that the borrower may sell the loaned securities short, which may place downward pressure on the market prices of the loaned securities, the risk that return of loaned securities could be delayed and could interfere with portfolio management decisions by the fund's Sub-Adviser, and the risk that any efforts to recall the securities for purposes of voting may not be effective.

Strategy Risks

In addition to the risks detailed herein, each investment strategy implemented by a Sub-Adviser is subject to investment risks that are unique to that strategy, and a fund's investment strategy may not produce the intended results. The specific risks associated with the investment strategy of each fund are set forth in the currently effective registration statement of the fund.

Cybersecurity and operational risk

Intentional cybersecurity breaches include unauthorized access to systems, networks, or devices (such as through "hacking" activity); infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow, or otherwise disrupt operations, business processes, or website access or functionality. In addition, unintentional incidents can occur, such as the inadvertent release of confidential information (possibly resulting in the violation of applicable privacy laws). A cybersecurity breach could result in the loss or theft of customer data or funds, the inability to access electronic systems ("denial of services"), loss or theft of proprietary information or corporate data, physical damage to a computer or network system, or costs associated with system repairs. Such incidents could cause a fund, John Hancock Variable Trust Advisers, a Sub-Adviser, or other service providers to incur regulatory penalties, reputational damage, additional compliance costs, litigation costs or financial loss. In addition, such incidents could affect issuers in which a fund invests, and thereby cause the fund's investments to lose value.

Cyber-events have the potential to materially affect a fund and John Hancock Variable Trust Advisers' relationships with accounts, shareholders, clients, customers, employees, products, and service providers. The Funds have established risk management systems reasonably designed to seek to reduce the risks associated with cyber-events. There is no guarantee that a fund will be able to prevent or mitigate the impact of any or all cyber-events.

A fund is exposed to operational risk arising from a number of factors, including, but not limited to, human error, processing and communication errors, errors of the fund's service providers, counterparties, or other third parties, failed or inadequate processes and technology or system failures.

Industry or sector investing risk

When a fund's investments are concentrated in a particular industry or sector of the economy, they are not as diversified as the investments of most funds and are far less diversified than the broad securities markets. This means that concentrated funds tend to be more volatile than other funds, and the values of their investments tend to go up and down more rapidly. In addition, a fund that invests in a particular industry or sector is particularly susceptible to the impact of market, economic, regulatory, and other factors affecting that industry or sector. From time to time, a small number of companies may represent a large portion of a single industry or a group of related industries as a whole.

Health Crisis Risk

A widespread health crisis such as a global pandemic could cause substantial market volatility, exchange trading suspensions and closures, and affect fund performance. For example, the novel coronavirus disease (COVID-19) has resulted in significant disruptions to global business activity. The impact of a health crisis and other epidemics and pandemics that may arise in the future, could affect the global economy in ways that cannot necessarily be foreseen at the present time. A health crisis may exacerbate other pre-existing political, social and economic risks. Any such impact could adversely affect a fund's performance, resulting in losses to the fund and its shareholders.

Item 9 – Disciplinary Information

Not applicable.

Item 10 – Other Financial Industry Activities and Affiliations

John Hancock Variable Trust Advisers is an indirect, majority-owned subsidiary of MFC. As such, John Hancock Variable Trust Advisers is affiliated with a number of investment advisers, investment companies, broker-dealers and insurance companies. Except as noted below, John Hancock Variable Trust Advisers does not believe that these relationships are material to John Hancock Variable Trust Advisers' advisory business with respect to the JHVIT funds.

Broker-Dealers

John Hancock Distributors LLC ("JHD") is the distributor of JHVIT. John Hancock Investment Management Distributors LLC ("John Hancock Investment Management Distributors") is the distributor of trusts managed by John Hancock Investment Management LLC ("John Hancock Investment Management"). JHD and John Hancock Investment Management Distributors are each related persons of John Hancock Variable

Trust Advisers. John Hancock Investment Management Distributors and JHD are broker-dealers registered with the SEC and are regulated by Financial Industry Regulatory Authority (“FINRA”). Both broker dealers are also supported by John Hancock’s shared services Broker Dealer Compliance department.

The Broker Dealer Compliance department performs testing of certain items in the Trust’s 38a-1 compliance program that pertain to JHD as distributor of the Funds. The Broker Dealer Compliance department coordinates with the CCO’s Office in performing this task. The Broker Dealer Compliance department also performs annual testing of JHD’s compliance program, required under FINRA rules 3110, 3120 and 3130. JHD makes the results of these tests available to the CCO’s Office. The Broker Dealer Compliance department is also responsible for maintaining appropriate securities registrations for JHD and John Hancock Investment Management Distributors and its associated persons.

Investment Companies

As described above, John Hancock Variable Trust Advisers serves as investment adviser to the Trust, and John Hancock Investment Management serves as investment adviser to several other registered investment companies.

MFC

MFC owns, directly or indirectly, a number of subsidiaries, including the following: JHD, the Affiliated Subadvisers noted below and John Hancock Investment Management.

Investment Advisers

John Hancock Variable Trust Advisers has entered into sub-advisory agreements with Manulife Investment Management (North America) Limited and Manulife Investment Management (US) LLC (the “Affiliated Sub-Advisers”), each of which is controlled by MFC.

Advisory arrangements involving Affiliated Sub-Advisers and investments in affiliated underlying funds present certain conflicts of interest. For each fund subadvised by an Affiliated Sub-Adviser, MFC, as the ultimate parent company of the Affiliated Subadviser and John Hancock Variable Trust Advisers, will benefit not only from the net advisory fee retained by John Hancock Variable Trust Advisers but also from the subadvisory fee paid by John Hancock Variable Trust Advisers to the Affiliated Sub-Adviser. Consequently, MFC is benefiting financially from one or more of the following: (i) the appointment of or continued service of Affiliated Sub-Advisers to manage the funds; and (ii) the allocation of the assets of Funds of Funds to other funds (“Underlying Funds”) having Affiliated Sub-Advisers. Therefore, the Affiliated Subadviser that manages the fund of funds has a conflict of interest in the allocation of the assets of these funds to affiliated Underlying Funds as opposed to unaffiliated Underlying Funds and in

the appointment of Affiliated Sub-Advisers. In each case, the Affiliated Sub-Adviser benefits through the additional subadvisory fees they earn on the additional assets resulting from such appointment or allocation. The Trust's "manager of managers" exemptive order from the SEC provides that the Trust must obtain shareholder approval of any sub-advisory agreement appointing an Affiliated Sub-Adviser as the sub-adviser to a fund, except as otherwise permitted by applicable SEC No-Action Letter (in the case of a new fund, the initial sole shareholder of the fund, an affiliate of John Hancock Variable Trust Advisers and MFC, may provide this approval). The independent trustees of the Board are aware of and monitor these conflicts of interest.

In addition, MFC and its John Hancock insurance company subsidiaries may benefit from investment decisions made by Affiliated Sub-Advisers, including allocation decisions with respect to a Fund of Funds' assets. For example, Affiliated Sub-Advisers, by selecting more conservative investments, or by making more conservative allocations of a Fund of Funds' assets by increasing the percentage allocation to Underlying Funds which invest primarily in fixed-income securities or otherwise, may reduce the regulatory capital requirements which the John Hancock insurance company subsidiaries of MFC must satisfy in order to support their guarantees under variable annuity and insurance contracts which they issue. In all cases, however, John Hancock Variable Trust Advisers in recommending to the Board the appointment or continued service of Affiliated Sub-Advisers and the Affiliated Sub-Advisers in selecting investments and allocating each Fund of Funds' assets have a fiduciary duty to act in the best interests of the funds and their shareholders. As part of its oversight of the funds and the Sub-Advisers, John Hancock Variable Trust Advisers will monitor to ensure that allocations are conducted in accordance with these principles.

With respect to JHVIT funds that are investment options in variable annuity and insurance contracts, John Hancock Variable Trust Advisers may be influenced by certain benefits to its affiliated life insurance companies in managing the Funds and overseeing their Sub-Advisers. The John Hancock insurance companies issuing guaranteed benefits on variable annuity and insurance contracts investing in these Funds have a financial interest in preserving the value of the Funds and reducing their volatility due to their obligations for these guaranteed benefits (the cost of providing these guaranteed benefits is related to several factors including the performance and volatility of the fund). To the extent the Fund is successful in managing the volatility of returns and downside risk, the John Hancock insurance companies issuing guaranteed benefits on variable annuity and insurance contracts investing in the Fund will also benefit from a reduction in their potential investment risk which will reduce their costs of hedging this risk and may reduce their reserve and capital requirements. These financial benefits to the John Hancock insurance companies may be material. The Funds and John Hancock Variable Trust Advisers have adopted procedures that are intended to address these conflicts and ensure that the Funds are managed in accordance with their disclosed investment objectives and strategies.

All investment management arrangements with related parties are conducted on an arms-length basis as to neither advantage nor disadvantage the Adviser's other clients or the above mentioned related parties.

Compensation of financial intermediaries

The JHVIT funds are not sold directly to the general public but instead are offered as underlying investment options for variable insurance contracts. The distributors of these contracts, the insurance companies that issue the contracts and their related companies ("Related Parties") may pay compensation to broker-dealers and other intermediaries for distribution and other services and may enter into revenue sharing arrangements with certain intermediaries. The JHVIT funds pay fees to the Related Parties for management, distribution and other services. Payments by insurance and related companies to intermediaries may create a conflict of interest by influencing them and their salespersons to recommend such contracts over other investments.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

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

The Code states that each Covered Employee is responsible for maintaining the very highest ethical standards when conducting company business. In general, John Hancock Variable Trust Advisers 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 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 John Hancock Variable Trust Advisers to monitor various securities transactions by Covered Employees, including those in shares of any mutual funds advised by John Hancock Variable Trust Advisers 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 or his designee 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 John Hancock Variable Trust Advisers at 617-663-3000.

John Hancock Variable Trust Advisers has also adopted an Amended and Restated Policy Statement and Procedures on Insider Trading in accordance with Section 204A of the Advisers Act which establishes procedures to prevent the misuse of material information by its officers, directors and employees. John Hancock Variable Trust Advisers 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, John Hancock Variable Trust Advisers 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 with respect to 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

Each of the Trust's Sub-Advisers, including the Trust's Affiliated Sub-Advisers, manage a number of accounts other than the Funds subject to oversight by John Hancock Variable Trust Advisers and the Board. Although investment determinations for the Funds will be made by the Sub-Advisers independently from the investment determinations made by them for any other account, investments deemed appropriate for the Funds by the Sub-

Advisers may also be deemed appropriate by them for other accounts. Therefore, the same security may be purchased or sold at or about the same time for both the Funds and other accounts. In such circumstances, the Sub-Advisers may determine that orders for the purchase or sale of the same security for the Funds and one or more other accounts should be combined. In this event the transactions will be priced and allocated in a manner deemed by the Sub-Advisers to be fair and equitable and in the best interests of the Funds and such other accounts, over time.

From time to time, employees and principals of John Hancock Variable Trust Advisers or a related person may also invest or otherwise have an interest in securities owned by or recommended to John Hancock Variable Trust Advisers' clients.

Similarly, some or all of the financial services businesses under common control with John Hancock Variable Trust Advisers may invest in securities that are also owned by John Hancock Variable Trust Advisers' 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. This presents a conflict of interest to the extent that such businesses and persons have an incentive: (i) to recommend or otherwise favor securities or other vehicles in which they invest or otherwise have an interest where doing so would not be in a client's best interest; or (ii) to put their own interest ahead of a client's interest. As these situations can involve potential conflicts of interest, John Hancock Variable Trust Advisers 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. John Hancock Variable Trust Advisers has also implemented policies and procedures designed to review and monitor trading associated with fund mergers, liquidations and asset allocation fund rebalancing, in order to identify and address potential issues associated with these transactions in a proactive and timely manner.

Item 12 – Brokerage Practices

Pursuant to the sub-advisory agreements between John Hancock Variable Trust Advisers and its Sub-Advisers, the Sub-Advisers are responsible for placing all orders for the purchase and sale of portfolio securities of the Trust's portfolios, subject to the oversight of John Hancock Variable Trust Advisers and in compliance with the registration statements of the JHVIT funds. The following description of the Sub-Advisers' policies is qualified in its entirety to reference to the relevant Sub-Advisers' disclosures concerning their brokerage practices.

The Sub-Advisers have no formula for the distribution of a portfolio's brokerage business; rather they place orders for the purchase and sale of securities with the primary objective of obtaining the most favorable overall results for the portfolio. The cost of securities transactions for each portfolio will consist primarily of brokerage commissions or dealer or underwriter spreads. Fixed-income securities and money market instruments

are generally traded on a net basis and do not normally involve either brokerage commissions or transfer taxes.

For securities traded primarily in the over-the-counter market, the Sub-Advisers will, where possible, deal directly with dealers who make a market in the securities unless better prices and execution are available elsewhere. Such dealers usually act as principals for their own account. For bonds and money market instruments, any commission is implied by the difference or “spread” between the price for which the dealer purchases the bond and the price at which the dealer sells the bond. A new issue fixed income security is sold to purchasers at a net price with a fixed sales credit paid to the underwriter by the issuer of the security. Occasionally, securities may be purchased directly from the issuer.

Selection of Brokers or Dealers to Effect Trades. In selecting brokers or dealers to implement transactions, the Sub-Advisers will give consideration to a number of factors, including:

- price, dealer spread or commission, if any,
- the reliability, integrity and financial condition of the broker-dealer,
- size of the transaction,
- difficulty of execution,
- brokerage and research services provided (unless prohibited by applicable law), and
- confidentiality and anonymity.

Consideration of these factors by a Sub-adviser, either in terms of a particular transaction or the Sub-adviser’s overall responsibilities with respect to the portfolio and any other accounts managed by the Sub-Adviser, could result in the applicable portfolio paying a commission or spread on a transaction that is in excess of the amount of commission or spread another broker-dealer might have charged for executing the same transaction.

Soft Dollar Considerations. In selecting brokers and dealers, the Sub-Advisers will give consideration to the value and quality of any research, statistical, quotation, brokerage or valuation services provided by the broker or dealer to the Sub-Adviser. In placing a purchase or sale order, unless prohibited by applicable law, the Sub-Adviser may use a broker whose commission in effecting the transaction is higher than that of some other broker if the Sub-adviser determines in good faith that the amount of the higher commission is reasonable in relation to the value of the brokerage and research services provided by such broker, viewed in terms of either the particular transaction or the Sub-Adviser’s overall responsibilities with respect to the relevant portfolio(s) and any other accounts managed by the Sub-Adviser. In addition to statistical, quotation, brokerage or valuation services, brokers and dealers may also provide products or research that are used for both research and other purposes, such as administration or marketing. In such case, the Sub-adviser will make a good faith determination as to the portion attributable

to research. Only the portion attributable to research will be paid through portfolio brokerage. The portion not attributable to research will be paid by the Sub-Adviser. Research products and services may be acquired or received either directly from executing brokers or indirectly through other brokers in step-out transactions. A “step-out” is an arrangement by which a Sub-adviser executes a trade through one broker-dealer but instructs that entity to step-out all or a portion of the trade to another broker-dealer. This second broker-dealer will clear and settle, and receive commissions for, the stepped-out portion. The second broker-dealer may or may not have a trading desk of its own.

Under the EU’s Markets in Financial Instruments Directive (“MiFID II”), EU investment managers, including certain Sub-Advisers to JHVIT funds, may only pay for research from brokers and dealers directly out of their own resources or by establishing “research payment accounts” for each client, rather than through client commissions. MiFID II is expected to limit the use of soft dollars by subadvisors located in the EU, if applicable, and in certain circumstances may result in other Sub-Advisers reducing the use of soft dollars as to certain groups of clients or as to all clients.

A Sub-adviser also receives research or research credits from brokers that are generated from underwriting commissions when purchasing new issues of fixed-income securities or other assets for portfolios of the Trusts. These services, which in some cases also maybe purchased for cash, include such matters as general economic and security market reviews, industry and company reviews, evaluations of securities and recommendations as to the purchase and sale of securities.

Some of these services are of value to the Sub-Advisers in advising several of their clients (including the JHVIT funds), although not all of these services are necessarily useful and of value in managing the portfolios of the JHVIT funds. The management fee paid by a portfolio is not reduced because the Sub-Adviser and its affiliates receive such services.

As noted above, a Sub-adviser may purchase new issues of securities for a portfolio in underwritten fixed price offerings. In these situations, the underwriter or selling group member may provide the Sub-adviser with research in addition to selling the securities (at the fixed public offering price) to the portfolio or other advisory clients. Because the offerings are conducted at a fixed price, the ability to obtain research from a broker-dealer in this situation provides knowledge that may benefit the portfolio, other managed accounts, and the Sub-adviser without incurring additional costs. These arrangements may not fall within the safe harbor of Section 28(e) of the Securities Exchange Act of 1934 because the broker-dealer is considered to be acting in a principal capacity in underwritten transactions. However, the Financial Industry Regulatory Authority has adopted rules expressly permitting broker-dealers to provide bona fide research to advisers in connection with fixed price offerings under certain circumstances. As a general matter in these situations, the underwriter or selling group member will provide research credits at a rate that is higher than that which is available for secondary market transactions.

Brokerage and research services provided by brokers and dealers include advice, either directly or through publications or writings, as to:

- the value of securities,
- the advisability of purchasing or selling securities,
- the availability of securities or purchasers or sellers of securities, and
- analyses and reports concerning (a) issuers, (b) industries, (c) securities, (d) economic, political and legal factors and trends and (e) portfolio strategy.

Research services are received primarily in the form of written reports, computer generated services, telephone contacts and personal meetings with security analysts. In addition, such services may be provided in the form of meetings arranged with corporate and industry spokespersons, economists, academicians and government representatives. In some cases, research services are generated by third parties but are provided by or through a broker.

To the extent research services are used by the Sub-Advisers, such services would tend to reduce such party's expenses. However, the Sub-Advisers do not believe that an exact dollar value can be assigned to these services. Research services received by the Sub-Advisers from brokers or dealers executing transactions for the JHVIT funds, which may not be used in connection with a portfolio, also will be available for the benefit of other funds managed by the Sub-Advisers.

Sales of Fund Shares by Broker-Dealers. Consistent with the duty to seek best execution, trades for a JHVIT fund may be executed by dealers that also sell shares of another JHVIT fund or a John Hancock Fund. However, the Sub-Adviser is prohibited from considering sales of shares of these funds as a factor in the selection of broker-dealers to execute portfolio transactions for the funds. John Hancock Variable Trust Advisers has implemented policies and procedures (approved by the Board) that John Hancock Variable Trust Advisers considers to be reasonably designed to ensure that the selection of broker-dealers by the Sub-Advisers is not influenced by a broker dealer's sales of fund shares.

Allocation of Trades by the Sub-Advisers. As described in Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading, the Sub-Advisers manage a number of accounts other than the portfolios of the Trusts. Although investment determinations for the portfolios of the Trusts will be made by a Sub-Advisor independently from the investment determinations it makes for any other account, investments deemed appropriate for a portfolio of the Trust by a Sub-Adviser also may be deemed appropriate by it for other accounts. Therefore, the same security may be purchased or sold at or about the same time for both a portfolio of a Trust and other accounts. In such circumstances, a Sub-Adviser may determine that orders for the purchase or sale of the same security for a portfolio of the Trusts and one or more other accounts should be combined. In this event the transactions will be priced and allocated in a manner deemed by the Sub-Adviser to be equitable and in the best interests of the particular portfolio of the Trusts and such other accounts. While in some instances

combined orders could adversely affect the price or volume of a security, the Trusts each believe that a portfolio's participation in such transactions on balance will produce better overall results for the portfolio.

For purchases of equity securities, when a complete order is not filled, a partial allocation will be made to each participating account pro rata based on the order size. For high demand issues (for example, initial public offerings), shares will be allocated pro rata by account size as well as on the basis of account objective, account size (a small account's allocation may be increased to provide it with a meaningful position), and the account's other holdings. In addition, an account's allocation may be increased if that account's portfolio manager was responsible for generating the investment idea or the portfolio manager intends to buy more shares in the secondary market. For fixed-income accounts, generally securities will be allocated when appropriate among accounts based on account size, except if the accounts have different objectives or if an account is too small to receive a meaningful allocation. For new issues, when a complete order is not filled, a partial allocation will be made to each account pro rata based on the order size. However, if a partial allocation is too small to be meaningful, it may be reallocated based on such factors as account objectives, strategies, duration benchmarks and credit and sector exposure. For example, value funds will likely not participate in initial public offerings as frequently as growth funds. In some instances, this investment procedure may adversely affect the price paid or received by the portfolios or the size of the position obtainable for it. On the other hand, to the extent permitted by law, a subadvisor may aggregate securities to be sold or purchased for the portfolios with those to be sold or purchased for other clients that it manages in order to obtain best execution.

Affiliated Underwriting Transactions by the Sub-Advisers. The Board of the Trusts has approved procedures in conformity with Rule 10f-3 under the 1940 Act whereby a portfolio may purchase securities that are offered in underwritings in which an affiliate of the Sub-Advisers participate. These procedures prohibit a portfolio from directly or indirectly benefiting John Hancock Variable Trust Advisers, a Sub-Adviser or such an affiliate in connection with such underwritings. In addition, for underwritings where such an affiliate participates as a principal underwriter, certain restrictions may apply that could, among other things, limit the amount of securities that the portfolios could purchase.

Affiliated Brokerage. Pursuant to procedures determined by the Board of the Trust in conformity with Rule 17e-1 under the 1940 Act and consistent with the above policy of obtaining best net results, a portfolio may execute portfolio transactions with or through brokers affiliated with John Hancock Variable Trust Advisers or the Sub-Adviser ("Affiliated Brokers"). Affiliated Brokers may act as broker for portfolios on exchange transactions, subject, however, to the general policy set forth above and the Board's procedures. Commissions paid to an Affiliated Broker must be at least as favorable as those that the Board believe to be contemporaneously charged by other brokers in connection with comparable transactions involving similar securities being purchased or sold. A transaction would not be placed with an Affiliated Broker if a portfolio would have to pay a commission rate less favorable than the Affiliated Broker's

contemporaneous charges for comparable transactions for its other most favored, but unaffiliated, customers, except for accounts for which the Affiliated Broker acts as clearing broker for another brokerage firm, and any customers of the Affiliated Broker not comparable to the portfolio, as determined by a majority of the Trustees of the Board who are not “interested persons” (as defined in the 1940 Act) of the John Hancock Funds, John Hancock Variable Trust Advisers, the Sub-Advisers or the Affiliated Broker. Because John Hancock Variable Trust Advisers or the Sub-Advisers that are affiliated with the Affiliated Broker have, as investment advisers to the portfolios, the obligation to provide investment management services, which includes elements of research and related investment skills such research and related skills will not be used by the Affiliated Broker as a basis for negotiating commissions at a rate higher than that determined in accordance with the above criteria.

Funds of Funds. Certain of the portfolios are “Funds of Funds.” A Fund of Funds invests primarily in shares of other investment companies, typically mutual funds or ETFs. With respect to mutual funds, such shares are purchased and redeemed directly with the fund’s principal underwriter at net asset value. Consequently, there is no opportunity to seek improvement in the price of the securities being purchased or a reduction in the transaction costs. However, where a mutual fund offers different share classes with differing “loads” or fees, the Sub-Adviser typically seeks to invest in the most efficient available share class. The same is true when a portfolio that is not a Fund of Funds invests in another fund. In cases where the underlying fund is an ETF, shares are traded through exchanges and the Sub-Adviser may be in a position to select which broker or dealer will effect the trade. In those cases, the considerations discussed above apply.

Commission Recapture Program. The Board of the Trusts has also approved each portfolio’s participation in a commission recapture program. Commission recapture is a form of institutional discount brokerage that returns commission dollars directly to a portfolio. It provides a way to gain control over the commission expenses incurred by a Sub-Adviser, which can be significant over time and thereby reduce expenses, improve cash flow and conserves assets. A portfolio can derive commission recapture dollars from both equity trading commissions and fixed income (commission equivalent) spreads. From time to time, the Board reviews whether participation in the recapture program is in the best interests of the JHVIT funds.

Item 13 – Review of Accounts

As indicated in response to Item 4 – Advisory Business, John Hancock Variable Trust Advisers generally contracts with Sub-Advisers who manage Fund assets under the supervision of John Hancock Variable Trust Advisers. John Hancock Variable Trust Advisers reviews the performance and compliance program of the portfolios managed by Sub-Advisers and reports to the Board of the Trust at least quarterly. Detailed information regarding the account reviews performed by John Hancock Variable Trust

Advisers is described in Item 4 – Advisory Business and Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.

John Hancock Variable Trust Advisers' finance department also performs monthly and quarterly close processes to ensure that John Hancock Variable Trust Advisers' financials accurately reflect its financial results. The finance department provides quarterly reports and analysis to the Board on behalf of John Hancock Variable Trust Advisers, manages internal and external audits; and oversees a risk management process that evaluates and controls financial and operational risk with respect to services provided to the Funds.

Item 14 – Client Referrals and Other Compensation

John Hancock Variable Trust Advisers does not directly or indirectly compensate any person who is not John Hancock Variable Trust Advisers' supervised person for client referrals.

John Hancock Variable Trust Advisers and its related persons receive economic benefits from non-clients in connection with advice given to clients. To the extent assets of Fund of Funds managed by a Sub-Adviser are invested in underlying John Hancock funds underwritten or advised by John Hancock Variable Trust Advisers or its related persons, the Rule 12b-1 and management fees received by these related persons from the underlying funds are increased. In addition, to the extent the assets of an underlying John Hancock fund subject to an expense limitation agreement increase due to investments by such fund of funds, the obligation of John Hancock Variable Trust Advisers or a related person under such expense limitation agreement to waive or reimburse fees or expenses may be reduced or eliminated. Further, John Hancock Variable Trust Advisers may receive a percentage of the advisory or other fees received by managers or underwriters of underlying funds attributable to assets of Fund of Funds advised by John Hancock Variable Trust Advisers.

Item 15 – Custody

Except in the case of fund of funds advised by John Hancock Variable Trust Advisers, John Hancock Variable Trust Advisers in its capacity as investment adviser does not maintain custody of client funds or securities. In the case of these fund of funds, John Hancock Variable Trust Advisers holds custody of the shares of the underlying funds held by the fund of funds.

Item 16 – Investment Discretion

As a manager of managers, John Hancock Variable Trust Advisers administers the business and affairs of the Trust, including the investment portfolios of the JHVIT funds, and retains, supervises, and compensates Sub-Advisers to manage the assets of the investment portfolios of the JHVIT funds. In its role as a manager-of-managers, John

Hancock Variable Trust Advisers has overall supervisory responsibility for the general management and investment activities of each JHVIT fund, but does not, in the normal course of business, assume direct investment discretion to manage the securities accounts of the JHVIT funds.

John Hancock Variable Trust Advisers also has the authority, with Board approval, to manage a Fund of Funds directly and, in that case, would be responsible for implementing asset allocation strategies, including by rebalancing the Fund of Fund's underlying funds to maintain target allocations. It is not the current practice of John Hancock Variable Trust Advisers to exercise this authority in the normal course of business.

Item 17 – Voting Client Securities

The Trust's proxy voting policies and procedures (the "Procedures") delegate the responsibility for voting proxies relating to portfolio securities held by a Fund to the Fund's investment adviser, John Hancock Variable Trust Advisers or, if John Hancock Variable Trust Advisers has delegated portfolio management responsibilities to one or more Sub-Advisers, to the Sub-Adviser, subject to the Board's oversight. When serving as a manager of managers, John Hancock Variable Trust Advisers delegates portfolio management responsibilities to one or more Sub-Advisers. Each Sub-Adviser has the responsibility to vote all proxies relating to securities held by a portfolio in accordance with the Sub-Adviser's proxy voting policies and procedures. John Hancock Variable Trust Advisers retains the responsibility to oversee each Sub-Adviser's compliance with the Procedures. A Sub-Adviser has a duty to vote such proxies in the best interests of the fund and its shareholders. Complete descriptions of the Trust's Procedures and the proxy voting procedures of each of the Sub-Advisers are set forth in the currently effective registration statement's Statement of Additional Information (the "SAI") for the Trust.

It is possible that conflicts of interest will arise for a Sub-Adviser when voting proxies. Such conflicts can arise, for example, when the Sub-Adviser or its affiliate has a client or other business relationship with the issuer of the security being voted or with a third party that has an interest in the vote. A conflict of interest can also arise when the Trust, its investment adviser or principal underwriter or any of their affiliates has an interest in the vote, for example, a vote to increase an advisory fee for a fund in the Trust.

In the event a Sub-Adviser becomes aware of a material conflict of interest, the Procedures generally require the Sub-Adviser to follow conflicts procedures included in the Sub-Adviser's proxy voting procedures. Although conflicts procedures will vary among Sub-Advisers, they generally provide for one or more of the following:

- (i) voting pursuant to the recommendation of a third party voting service;
- (ii) voting pursuant to pre-determined voting guidelines; or
- (iii) referring voting to a special compliance or oversight committee.

The specific conflicts procedures of each Sub-Adviser are set forth in its proxy voting procedures included in the SAI of the Trust. While these conflicts procedures may

reduce, they will not necessarily eliminate, any influence on proxy voting of conflicts of interest.

Although Sub-Advisers have a duty to vote all proxies on behalf of the Funds they sub-advise, it is possible that a Sub-Adviser may not be able to vote proxies under certain circumstances. For example, it may be impracticable to translate in a timely manner voting materials that are written in a foreign language or to travel to a foreign country when voting in person rather than by proxy is required. In addition, if the voting of proxies for shares of a security prohibits the Sub-Adviser from trading the shares in the marketplace for a period of time, the Sub-Adviser may determine that it is not in the best interests of the portfolio to vote the proxies. In addition, consistent with its duty to vote proxies in the best interests of a fund's shareholders, a Sub-Adviser may refrain from voting one or more of the Fund's proxies if a Sub-Advisor believes that the costs of voting such proxies may outweigh the potential benefits. For example, A Sub-Adviser may also choose not to recall securities that have been loaned in order to vote proxies for shares of the security since the Fund would lose security lending income if the security were recalled.

John Hancock Variable Trust Advisers also has a Proxy Voting Committee (the "Committee") that was established pursuant to its Proxy Voting Policies and Procedures for the purpose of making recommendations to John Hancock Variable Trust Advisers on the voting of proxies under specific conditions. For example, voting shares of an underlying fund held by a fund of funds advised by John Hancock Variable Trust Advisers where in certain cases the fund of funds may mirror vote the vote of other shareholders in an underlying fund. In carrying out its proxy voting responsibilities, John Hancock Variable Trust Advisers will monitor, and submit to the Committee for resolution, potential material conflicts between the interests of a Fund and John Hancock Variable Trust Advisers or any of its affiliated persons.

Information regarding how proxies relating to portfolio securities were voted during the most recent 12-month period is available (1) without charge, upon request, by calling (800) 344-1029 and (2) on the SEC's website at <http://www.sec.gov>. A copy of the Trust's proxy voting policy, John Hancock Variable Trust Advisers' proxy voting policy and the proxy voting policy of each Sub-Adviser to a Fund of the Trust is included as an exhibit to the Trust current SAI available on the SEC's website at <http://www.sec.gov> or by calling (800) 344-1029.

Item 18 – Financial Information

John Hancock Variable Trust Advisers 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.