

Compliance Statement
For the twelve-month period ending December 31, 2011

For the reporting period noted above, the undersigned confirms that:

1. The Investment Managers listed below have confirmed to Manulife Financial Group Retirement Solutions (GRS) that, in all material respects:
 - I. Each has operated within the terms, conditions and guidelines stipulated in the respective Funds' Statement of Investment Policies
 - II. Each has managed its Funds according to applicable legislation (pension, insurance or securities).
 - III. Each has confirmed that decisions made with respect to the investments of its Funds are made in the best interests of the unit holders.
 - IV. Each has policies and procedures in place to discourage, detect, report, and regulate unethical trading practices or behaviour of their professionals and staff.
 - V. To the extent that Manulife Financial GRS was made aware of any material deviations from the Fund's Statement of Investment Policies, such deviations were reported in quarterly compliance reports distributed to Manulife Business Unit Compliance Officers.

Addenda Capital	AGF Management Limited	Alliance Bernstein Investments
Artio Global Management LLC	Beutel Goodman	BlackRock Asset Management Canada Limited (formerly known as "Barclays Global Investors Canada Limited")
Brandes Investment Partners	Burgundy Asset Management	CI Investments
CIBC Global Asset Management	Fidelity Investments Canada ULC	Foyston Gordon Payne Investment Counsel
Franklin Templeton Investments	Guardian Capital LP	GE Asset Management
Genus Capital Management	Greystone Managed Investments	Integra Capital Ltd.
Invesco Ltd	Jarislowky Fraser Limited	JPMorgan Asset Management
Legg Mason	Leith Wheeler Investment Counsel Ltd.	Manulife Asset Management (formerly known as "MFC Global Investment Management")
Mawer Investment Management Ltd	McLean Budden Limited	MFS Institutional Advisors, Inc
Montrusco Bolton Investments	Newport Partners	Phillips, Hager & North Investment Management Ltd.
Pictet Asset Management	Russell Investments Canada Limited	Scheer Rowlett & Associates Investment Management
SEAMARK Asset Management Ltd.	SEI Investment Management	Sprucegrove Investment Management
Wellington Management		

2. Manulife Financial, through its i-Watch program, which includes the investments under the Certified Diversified Warranty, monitors the quantitative and qualitative performance of the investment managers and the investments. Manulife Financial declares the following investment managers are wholly owned subsidiaries: Manulife Asset Management Limited and Manulife Asset Management Limited (US) LLC operating as Portfolio Solutions Group (PSG).
3. GRS has substantially provided the recordkeeping, tax reporting and other administrative services stipulated in the Plan Services Agreements or Service and Fee Agreement (as applicable) according to applicable legislation. We confirm that our services have been developed and delivered to meet or exceed the applicable standards of the CAP Guidelines.
4. GRS produced a *Section 5970 Report on Controls Placed in Operation and Tests of the Operating Effectiveness of Controls* (CICA Section 5970) covering the period from January 1, 2011 to September 30, 2011 together with a Bridge letter providing assurance that the controls continue operate effectively for the period of October 1, 2011 to December 31, 2011. This report offers the results of a comprehensive audit completed by the independent, external auditing firm of Ernst & Young LLP, and concentrates on our key internal controls. The Auditor's Report is dated December 8, 2011 and the Bridge letter is dated January 5, 2012.
5. The assets of the pension fund held by Manulife Financial are held under an insurance policy issued to the plan sponsor solely for the purpose of funding the plan and has been registered, where applicable, with the appropriate regulators, and indicates that the investment is held for the plan.
6. Manulife Financial has an employee Code of Business Conduct, Records Management and Privacy Policies to which all employees must adhere.


Sue Reibel
SVP Group Retirement Solutions