EQUITABLE

Reporting Misconduct

December 2025

CONFIDENTIALITY: INTERNAL

Introduction

Equitable (the "Company") is committed to high standards of ethical, honest, and legal business conduct. In line with this principle and our commitment to open communication, this policy provides for the reporting of Misconduct or Allegations (as such terms are defined below) and prohibits retaliation against those that report Misconduct or make other Allegations. It should be noted that Alliance Bernstein and FMG each maintain their own independent Reporting Misconduct Policy, Code of Ethics and Fraud Policy.
This policy is intended to comply with the requirements of Section 301 of the Sarbanes-Oxley Act of 2002, Section 922 of the Dodd-Frank Act of 2010, and the New York Stock Exchange's corporate governance standards for listed companies.

Definition of terms

Term	Definition
"Accounting Misconduct"	Means: • Fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of the Company or one of its subsidiaries; • fraud or deliberate error in the recording and maintaining of financial records of the Company or one of its subsidiaries; • deficiencies in, or non-compliance with, the Company's or one of its subsidiary's internal accounting controls; • misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company or one of its subsidiaries; or • deviation from full and fair reporting of the Company's or one of its subsidiary's financial condition.
"Allegations"	Means reports made by an Equitable Person of suspected inappropriate, unethical, or illegal behavior of another Equitable Person, including Accounting Misconduct.
"Equitable" or the "Company"	Means Equitable and its subsidiaries, other than Alliance Bernstein Holding L.P., Alliance Bernstein L.P. (collectively, "Alliance Bernstein"), and any subsidiary of Alliance Bernstein.
"Equitable Person"	Means any employee or financial professional of Equitable or one of its subsidiaries,1 or any person or entity acting on their behalf.
"Misconduct"	Means any practice or action which is inappropriate or inconsistent with any of Equitable's policies and includes Accounting Misconduct.

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"Whistle-blowing"	Means an Equitable Person making a protected disclosure under applicable law about misconduct.
"Subsidiary"	Does not include Alliance Bernstein Holding L.P., Alliance Bernstein L.P., and any of their subsidiaries.

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Scope

This policy applies to all Equitable Persons and is meant to govern the obligations and procedures related to reporting Misconduct and Allegations.

Reporting

All Equitable Persons are encouraged to promptly report Misconduct and Allegations. Those in management positions or in Human Resources have a heightened duty to report Misconduct and Allegations that are brought directly to their attention or about which they become aware.

Retaliation

No Equitable Person shall:

- Discriminate, harass, or retaliate against any individual that reports Misconduct or Allegations or participates in the investigation of Misconduct or Allegations; or
- Make a report in bad faith or otherwise abuse the reporting system set forth in this policy.

Any Equitable Person who:

i. is involved in discrimination, harassment or retaliation against those who make reports in good faith,

ii. makes a report in bad faith or

iii. otherwise abuses the reporting system set forth in this policy will be subject to disciplinary action up to and including dismissal

Reporting Procedures

As a general matter, if an Equitable Person has any questions or concerns about possible Misconduct and Allegations, the Equitable Person is encouraged to speak with his or her supervisor or with a representative of Equitable's Financial Security Office, Human Resources Department, or Law Department. Equitable Persons can also call the Ethics Hotlines (see below for details). In making the report, the Equitable Person should make all efforts to focus on the factual situation that he or she believes is inconsistent with the policies, or are otherwise inappropriate, unethical, or illegal. The report should contain as much specific information as possible to allow an adequate assessment of the nature, extent, and urgency of the situation, and should be documented, as far as possible.

Anonymous reporting of any Misconduct or Allegations may be made by:

- Calling the Ethics and Misconduct Reporting Hotline at (844) 977-0471,
- Submitting an online Ethics and Misconduct Reporting incident through www.equitable.ethicspoint.com

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- QR code helps report misconduct

Any written allegations may be mailed directly to Equitable Financial Security Office Director at:

J. Michael Kennedy
100 Madison Street MD 36-20
Syracuse, NY 13202
j.michael.kennedy@equitable.com

Investigation Procedures

Referrals received at the Ethics and Misconduct Hotlines are received by the independent third-party entity Navex Global. The procedure allows for the reporting party to remain anonymous. The information is then referred to the Financial Security Office. Depending on the nature of the complaint, items are forwarded to the appropriate department (i.e., Compliance, Human Resources, or the Financial Security Office). The Investigations Team of the Financial Security Office will investigate all allegations of employee and non-employee suspected fraudulent activity. All allegations of fraud will be investigated and pursued to their appropriate conclusion, including termination of employment, criminal and other legal action where warranted. All allegations are logged and tracked in a database, accessible only by certain Financial Security Office personnel, as appropriate.

The decision to investigate any Allegation or report of Misconduct is not held by the individual responsible for triage of the reports, and this decision need not be communicated to the reporting Equitable Person. The subject of an Allegation or report of Misconduct need not be informed of the report against him or her. If an Equitable Person makes a report on a named basis, his or her identity will be kept confidential to the extent possible at every stage of the review and processing of the report/complaint.

Any Allegation or report of Misconduct that meets the definition of "Whistleblowing" under applicable law will be highlighted as such in triage and treated as "Whistle-Blowing" in accordance with applicable law.

All Equitable Persons have a duty to promptly cooperate, and provide accurate information in connection with, any investigation of Misconduct or Allegations or of discrimination, retaliation or harassment resulting from the report or investigation of such matters.

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Special Procedures for Accounting Misconduct

The General Counsel shall immediately receive notification of any report related to Accounting Misconduct and shall immediately notify the Chair of such report.

The General Counsel, in conjunction with Internal Audit personnel, to the extent the General Counsel deems necessary or appropriate, will undertake a preliminary investigation on behalf of the Audit Committee to determine if the report can be substantiated. Upon receiving the results of the preliminary investigation, the Chair will determine if any further action is required to follow up on the complaint.

The Chair has the power to take any appropriate action including, among other things to:

1. refer the matter to the full Audit Committee
2. refer the matter to the full Board of Directors
3. further investigate the matter
4. direct that a further internal investigation be conducted
5. retain outside counsel, accountants, or other third-party advisors to investigate

For more information, please contact AskHR at 1 (844) 839 - 3942.

Disclaimer

Neither the Employee Handbook, nor any other verbal or written communication by an Equitable management representative, is, nor should be considered, an agreement, contract of employment, express or implied, or a promise of treatment in any particular manner in any given situation. Although we hope that your relationship with us will be long-term, Equitable adheres to the policy of employment at will, which permits you or Equitable to terminate the employment relationship at any time, for any reason, with or without cause or notice. No Equitable management representative or officer of Equitable has any authority to provide you with an employment contract or special arrangement concerning terms or conditions of your employment. Many matters covered by the Employee Handbook, such as benefit plan descriptions, are also described in separate Equitable documents. These Equitable documents are always governing over any statement made in this handbook or by any member of Equitable management. The Employee Handbook states only general Equitable guidelines.

Equitable always reserves the right to amend, modify, alter or terminate any of the policies contained therein, at any time, in its sole discretion, with or without cause or notice.

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