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Anti-Bribery Policy

November 30, 2020

Equitable Holdings anti-bribery policy prohibits Equitable Holdings Persons from making or receiving bribes, as well as activities that could give rise to the perception of that impropriety. Section III of this policy sets forth the guidelines and prohibitions that apply in connection with Equitable Holdings business activities. Equitable Holdings anti- bribery policy should be read in conjunction with the Gift Policies and the Gifts & Entertainment Guide in Appendix C. It should also be read in conjunction with Equitable Holdings Political Activities and Lobbying Policies, and the Statement.

I. Scope:

Equitable Holdings anti-bribery policy applies to all Equitable Holdings Persons, and is meant to govern not only the giving or acceptance of bribes, but other activities that could give rise to the perception of impropriety.

This policy is not meant to prohibit the following practices provided they are customary in the market, are within the thresholds and rules set out in Gift Policies and the Gifts & Entertainment Guide in Appendix C of this Policy, and are properly recorded in accordance with Equitable Holdings policies:

- normal and appropriate hospitality, other than to Government Officials;
- the giving of a nominal ceremonial gift on a special occasion such as a seasonal holiday, provided that such gifts are not given to a Government Official; or
- the use of any legal fast-track process which is available to all on payment of a fee.

II. Statement of the Policy:

Equitable Holdings is committed to fully complying with applicable anti-bribery laws, including the FCPA. Equitable Holdings expects all Equitable Holdings Persons to conduct business legally and ethically. Bribery is entirely contrary to the Company's principles and approach to doing business.

Equitable Holdings prohibits Equitable Holdings Persons from offering, making, soliciting or accepting any payment, gift or other inducement for the purpose of improperly obtaining or retaining business, or to secure or provide an improper business advantage. Equitable Holdings Persons must conduct business activities with integrity and transparency, and are required to ensure all records of payments, gifts or other hospitality made or accepted by or on behalf of Equitable Holdings are accurately recorded on its books and records.

Bribery and corruption create unfair advantages for those willing to engage in unethical or illegal behavior. Many anti-bribery laws, such as the FCPA, have been in place for many years, but over the past decade there has been much progress internationally and by the United States to fight bribery so that all businesses may fairly compete in the global marketplace. See Appendix A for further details on the requirements and definitions of the FCPA.

Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. An Equitable Holdings Person does not actually have to make or accept a bribe to violate Equitable Holdings Policy and the law — merely offering, promising, authorizing or soliciting a bribe may be a violation. Bribes can take many forms but there usually will be a 'quid pro quo' where both parties will benefit by:



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- the direct or indirect promise, offering, or authorization, of anything of value;
- the offer or receipt of any kickback, loan, fee, reward or other advantage; or
- the giving of aid, donations or voting designed to exert improper influence.

Bribery and corruption laws regulate not only cash payments, but also other incentives; for example, travel, entertainment or gifts, or offers of employment or internships, or involve third parties or intermediaries that, directly or indirectly, act on a company's behalf. Improper gifts, payments or favors could jeopardize Equitable Holdings reputation and relationships with its clients and regulators, and could subject Equitable Holdings and responsible individuals to criminal and civil liability.

This policy is a key element of Equitable Holdings anti-bribery program, which connects a number of related policies and controls designed to mitigate bribery risk. In addition, this policy is an integral part of this Standards guide and the separate Statement and this policy should be read in conjunction with those documents. Any Equitable Holdings Person that contemplates providing Gifts and Entertainment to Government Officials must receive prior approval of **Gina Jones at (212) 314-5738** or by calling the **Ethics Hotline at 1-800-554-1503**.

III. Guidelines and Prohibitions:

(1) General

- (a) No Equitable Holdings Person may offer, make, solicit or accept any payment, gift or other inducement for the purpose of improperly obtaining or retaining business, or to secure or provide an improper business advantage.
- (b) There is no minimum amount or threshold exception for bribes. Equitable Holdings prohibits both the payment/offer/authorization and the receipt/acceptance of bribes.
- (c) An Equitable Holdings Person may never offer, make, solicit or accept a cash payment.

(2) Gifts & Entertainment ("G&E")

In certain circumstances, G&E may be perceived as attempts to "purchase" favorable treatment. Offering, giving, soliciting or accepting such inducements could raise doubts about an Equitable Holdings Person's ability to make independent business judgments, as well as about Equitable Holdings commitment to obeying laws and treating people fairly. In certain situations, such inducements may also be illegal. Any person the contemplates making Gifts and Entertainment to a Government Entity must receive prior written approval from the Senior Executive Director and General Counsel or his or her designee.

- (a) G&E, whether accepted or given, must be in accordance with accepted business practices. They should not be capable of being reasonably regarded as influencing an Equitable Holdings Person's business judgment.
- (b) High value and frequent gifts, entertainment, favors, benefits, and/or job offers may be seen



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as attempts to purchase favorable treatment illegally or inappropriately and must be avoided.

(c) All gifts and entertainment accepted or given must be disclosed in compliance with the requirements of the Equitable Holdings Gifts & Entertainment Guide and G&E Approval Form, unless other Equitable Holdings policies governing gifts and entertainment (together, "Department Gift Policies") apply in lieu of the G&E Guide, as set out in Appendix C.

(d) No Equitable Holdings Person may accept or give gifts or entertainments which public knowledge could impair confidence in Equitable Holding or the Equitable Holdings Person.

(3) Due Diligence for Third Party Relationships

Before contracting with a service provider, hiring an agent or consultant, or entering into a joint venture arrangement, an Equitable Holdings Person must perform appropriate anti-bribery focused due diligence and obtain from the third party certain assurances of compliance.

(a) All Equitable Holdings Persons involved with the on-boarding or oversight of third parties are prohibited from conducting informal arrangements or improper side agreements.

(b) All payments to third parties must be well documented and accurately described and recorded in Equitable Holdings books and records.

(c) Improper payments through intermediaries are prohibited—It is unlawful to make payments to a third party knowing that all or a portion of the payment is intended to go directly or indirectly to pay a bribe. In some situations, the term "knowing" has been interpreted to include conscious disregard and deliberate ignorance. As a result, liability may be imposed not only when a person actually knows of or authorizes an improper payment, but also when he or she turns a "blind eye" to (or ignores) indicators suggesting a violation.

(d) Equitable Holdings Persons with due diligence obligations should consider the following when evaluating third parties:

- (i) whether the third parties are qualified for the position;
- (ii) any personal or professional ties to a U.S. or foreign government;
- (iii) the reputation of their clientele;
- (iv) if a foreign entity, their reputation with the U.S. Embassy or Consulate and with local bankers, clients, and other business associates; and
- (v) the reputation of known partners or close associates.

(e) All arrangements with third parties must be in writing and may require an anti-bribery provision directly in the contract.

(f) Requests for fees or other inducements that are not included in the written agreement are "red flags" of bribery that must be evaluated properly. Requests for reimbursement of expenses must comply with all relevant policies and procedures.



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- (g) All Equitable Holdings Persons are required to be alert to the presence of “red flags” when negotiating business relationships (and as established business relationships with third parties progress). A list of common “red flags” that may indicate bribery or FCPA issues are in Appendix B.
- (h) Equitable Holdings Persons who identify high-risk situations are to seek early direction from the Financial Crime Office on the specific procedures they should follow and types of questions they should ask. This will help Equitable Holdings assess whether, in light of the particular circumstances, the third parties understand their own FCPA and anti-bribery obligations under applicable law – as well as Equitable Holdings expectations that those with whom Equitable Holdings transacts business will comply fully with the FCPA and applicable anti-bribery law – and will adhere to those obligations and expectations. In some circumstances, written contracts may require appropriate warranties tailored to the specific situation and the results of due diligence; for example:
 - (i) A warranty that the third party will not make offers or payments to public or private persons that have not been approved by Equitable Holdings, and will comply with this Policy and the FCPA; and
 - (ii) Equitable Holdings right to terminate the agreement without compensation if Equitable Holdings has reasonable grounds to conclude that the third party has engaged in bribery or has contravened this Policy.
- (i) If there is any question about the third party's commitment to comply, an Equitable Holdings Person must consult with the Financial Crime Office before proceeding. Moreover, if at any time during an established third-party relationship it is suspected that Equitable Holdings funds are being used for corrupt payments, notify the Financial Crime Office immediately.

(4) Interaction with Government Officials

Government interactions include any business connection with candidates for political office, legislators, Political Parties, or party officials, foreign government officials or employees, and officials and employees of government-owned enterprises and of public international organizations such as the United Nations.

- (a) Business activities with any form of public sector connection, including foreign-based government interactions, must be handled with integrity and transparency.
- (b) Any proposed payment or G&E to a government official must be pre-approved by the Equitable Holdings Insurance Practice Group within the Law Department even if such payment has been approved in the past. Equitable Holdings Persons should refer to the Equitable Holdings Political Activity Policy, and Equitable Advisors should also consult the Equitable Advisors Compliance Manual and the Equitable Advisors Investment Advisory Compliance Guide. Employees of Equitable FMG should consult the Equitable FMG Policies and Procedures Regarding Political Contributions and Related Activities.
- (c) No Equitable Holdings Person may run for elective office without first obtaining the approval



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of the Senior Executive Director and General Counsel of Equitable Holdings or his or her designee to ensure that there are no conflicts of interest with Equitable Holdings business. Equitable Holdings Persons should refer to the Equitable Holdings Political Activity Policy, and Equitable Advisors should also consult the Equitable Advisors Compliance Manual and the Equitable Advisors Investment Advisory Compliance Guide. Employees of Equitable FMG should consult the Equitable FMG Policies and Procedures Regarding Political Contributions and Related Activities.

(5) Facilitation Payments

Facilitation Payments are not permitted by Equitable Holdings.

(6) Political and Charitable Contributions

Equitable Holdings Persons should not solicit, or be solicited for, political and charitable donations from persons or companies unrelated to Equitable Holdings if there is a "quid pro quo" involved with Equitable Holdings or if the request may give rise to the perception of impropriety, in particular from persons or companies that do business with Equitable Holding. If an Equitable Holdings Person is uncertain if there is possible impropriety, he or she is required to seek advice of and approval from the Financial Crime Office in advance of accepting any such offer. In addition, Equitable Holdings Persons should refer to the Equitable Holdings Political Activity Policy, and Equitable Advisors should also consult the Equitable Advisors Compliance Manual and the Equitable Advisors Investment Advisory Compliance Guide. Employees of Equitable FMG should consult the Equitable FMG Policies and Procedures Regarding Political Contributions and Related Activities.

(7) Political contributions to Governmental Entities, officials (including a Foreign Official) or Political Candidates by or on behalf of Equitable Holdings are prohibited. See, also, the Equitable Holdings Political Activity Policy.

(8) Under no circumstances will Equitable Holdings reimburse personal Political contributions.

(a) Officers of Equitable Holdings must report political contributions made with personal funds to any Foreign Official or non-U.S. candidate or political party to the Financial Crime Office. Political Contributions made to U.S. candidates or Political Parties should comply with the Political Activity Policy.

(b) Any proposed payment or G&E to a government official must be pre-approved by the Senior Executive Director and General Counsel even if such payment has been approved in the past, by calling the **Ethics Hotline at 1-800-554-1503**.

(9) Hiring

(a) If any Equitable Holdings Person is asked to arrange employment opportunities (e.g., internships) for public officials or private persons or for their relatives (e.g., child, spouse, sibling, and nephew/niece) or friends, he or she must ensure that there is no "quid pro quo" involved and that there is no perception of impropriety. Equitable Holdings Professionals must seek advice and pre-approval from the Financial Crime Office if there is any information that suggests a proposed hire may be related to or materially connected with a government official or commercial



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counterparty.

(b) When an Equitable Holdings Person seeks employment opportunities for him or herself, relatives or friends with outside organizations, the Equitable Holdings Person must not solicit or accept employment opportunities if there is a "quid pro quo" involved with Equitable Holdings or if accepting may give rise to the perception of impropriety. Report any such offer to the Financial Crime Office. If an Equitable Holdings Person is uncertain if there is possible impropriety, the Equitable Holdings Person should seek advice from the Financial Crime Office.

(10) Record Keeping

Consistent with Equitable Holdings Statement, on Ensuring Accuracy of Books and Records, this Policy requires that corporate books and records accurately and fairly reflect, in reasonable detail, all transactions of Equitable Holdings, including all gifts, entertainment and any hospitality. Accordingly, an Equitable Holdings Person must ensure compliance with each of the following requirements:

- (a) No person shall participate in falsifying any accounting or other business record.
- (b) An Equitable Holdings Person must respond fully and truthfully to any questions from the Equitable Holdings internal or independent auditors.
- (c) No person shall make any payment on behalf of Equitable Holdings in cash or approve such payment with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documentation supporting the payment.

(11) Reporting Concerns and Possible Violations

In line with Equitable Holdings Statement, reporting possible bribery is encouraged and required in the spirit of good corporate governance. Anyone doing so in good faith will be protected against employment reprisals. Equitable Holdings Persons are responsible for promptly raising concerns about any possible misconduct related to this or any Equitable Holdings Standards policy or any bribery or corruption law. This includes the potential misconduct of Equitable Holdings Persons at all levels, consultants, third parties, and contract or temporary workers. Equitable Holdings Persons should also read and familiarize themselves with the Equitable Holdings Misconduct Reporting Policy.

- (a) Equitable Holdings Persons should raise concerns before problems develop. Failure to escalate can give rise to charges of "Willful Blindness."
- (b) Note that an Equitable Holdings Person may be subject to disciplinary action – which may include suspension or termination of employment or association with Equitable Holdings – if an Equitable Holdings Person violates the Statement, this Policy, makes a false report, or fails to cooperate fully in an investigation of a possible or actual violation.
- (c) For additional details on reporting concerns, see the Equitable Holdings Misconduct Reporting Policy.

IV. **Definitions**



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(1) "Equitable Holdings" or the "Company" means Equitable Holdings, Inc. and its subsidiaries, other than AllianceBernstein Holding L.P., AllianceBernstein L.P. (collectively, "Alliance Bernstein"), and any subsidiary of AllianceBernstein.

(2) "Equitable Holdings Person" means any employee, officer, inside director, registered representative, other financial professional, or any person or entity acting on behalf of Equitable Holdings. For the purposes of the Ethical Wall Policy and the Insider Trading Policy, Equitable Holdings Persons shall include outside directors.

(3) "Bribe" or "Bribery" means offering, promising, giving, demanding or accepting an advantage as an inducement for an action which is illegal, unethical or a breach of trust.

(4) "Facilitation Payments" means payments made as an inducement to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment typically already has a legal entitlement.

(5) "FCPA" means the U.S. Foreign Corrupt Practices Act.

(6) "Foreign Officials" has the same definition of that term under the FCPA and includes:

(a) any officer or employee of a non-U.S. government or any department, agency or instrumentality thereof (e.g., employees of a national bank), regardless of physical location;

(b) any officer or employee of a non-U.S. state-owned or controlled enterprise or fund (e.g., public utility or government pension fund) or a financial institution controlled by a foreign government (for example, international banks which, as a result of government investment during the economic crisis in recent years, are now controlled by foreign governments or foreign government bodies);

(c) any officer or employee of a public international organization (e.g., the International Monetary Fund, the World Bank, or the European Union);

(d) any person acting in an official capacity for or on behalf of any non-U.S. government, any department, agency, or instrumentality thereof, or any public international organization (e.g., an official advisor or other third party hired by a government);

(e) any non-U.S. political party or party official or any candidate for non-U.S. political office; or

(f) members of a royal family.

(7) "Forgery" means signing or initialing the signature or initials of another person with or without their consent, or creating by photocopy, transposition, cut and paste or other acts of dissemblance the authentic signature or initials of one person and placing it on another document. Original signatures and initials must be obtained on all documents.

(8) "Fraud" means an illegal act characterized by deceit, concealment or violation of trust committed by



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individuals and organizations to obtain money, property or services, avoid payment or loss of services, or to secure personal or business advantage, and which may include: fraudulent financial reporting; misappropriation of assets; improper or fraudulent financial activity; fraudulent conduct by senior management; expense report fraud; identity theft; commission, benefit, or recognition scheme; forgery; vendor fraud; or contract, policy or account application fraud.

- (9) "Fraudulent Financial Reporting" means intentional misstatements or omissions of amounts or disclosures in financial statements to deceive financial statement users, where the effect causes the financial statements not to be presented, in all material respects, in conformity with generally accepted accounting principles, e.g., fraud arising from improper revenue recognition, overstatement of assets or understatement of liabilities, or intentional use of unreasonable accounting estimates.
- (10) "Fraudulent Conduct by Senior Management" means fraud of any magnitude on the part of senior management (Public Company Accounting Oversight Board Standard No.2 – Clause 140).
- (11) "G&E" or "Gifts & Entertainment" means the receipt or offer of gifts, meals or tokens of appreciation and gratitude, or invitations to events, functions, or other social gatherings, in connection with matters related to Equitable Holdings business.
- (12) "Government Interactions" include any business connection with political candidates, legislators, political parties or party officials, foreign government officials or employees, and officials and employees of government-owned enterprises and of public international organizations such as the United Nations.
- (13) "Improper or Fraudulent Financial Activity" means, among other things, commercial and/or public bribery, over billing, employer fraud against employees, tax fraud, money laundering. For more guidance on bribery, please refer to the Equitable Holdings Anti-Bribery Policy.
- (14) "Misappropriation of Assets" means misstatements arising from misappropriation of assets (sometimes referred to as theft or defalcation) involve the theft of an entity's assets where the effect of the theft causes the financial statements not to be presented, in all material respects, in conformity with generally accepted accounting principles; e.g., embezzlement, pay roll fraud, external theft, procurement fraud, counterfeiting or similar activities.
- (15) "Misconduct" means any practice or action which is inappropriate or inconsistent with any of Equitable Holdings policies.
- (16) "Money Laundering" refers to transactions undertaken to convert illegal income or assets into funds with an apparently legal source. This enables illegally obtained funds to be used freely. Financial institutions, including Equitable Holdings, are required to file suspicious activity reports (SARs, as defined below) with law enforcement if "the firm knows, suspects or has reason to suspect that the transaction facilitates criminal activity."
- (17) "SAR" means the Suspicious Activity Report required to be filed with government authorities when money laundering is suspected.
- (18) "Vendor Fraud" means accepting or seeking anything of value from contractors, vendors or persons



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providing services or materials to Equitable Holdings, or fraudulently assisting a vendor in winning a contract.

(19) "Willful Blindness" is a deliberate, voluntary or intentional activity for concealing or masking an action or purpose. An employee is considered to be willfully blind if he or she has suspicions regarding a customer's transaction activity, but deliberately chooses not to make further inquiries, wishing instead to remain ignorant of, or conceal, the circumstances.



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APPENDIX A - UNDERSTANDING THE FCPA

The Foreign Corrupt Practices Act (“FCPA”) is long-standing anti-bribery legislation that has become a major focus of prosecutors and regulators of companies that conduct business outside the United States.

The FCPA is a criminal and securities law designed to deter improper payments to “foreign officials” (i.e., non-U.S. officials) in connection with business activities. The FCPA contains two fundamental provisions:

(1) a general prohibition on improper payments to non-U.S. officials; (2) a requirement to maintain accurate books and records and appropriate internal controls. The FCPA applies to U.S. and non-U.S. subsidiaries of Equitable Holdings, as well as to their officers, directors, employees, shareholders, and agents. Both criminal and civil penalties are possible for violations of the FCPA, which may be severe for both Equitable Holdings and the individuals responsible.

The term “foreign officials” has a very broad definition under the FCPA. Guidance on the definition of “foreign official” includes:

- (a) any officer or employee of a non-U.S. government or any department, agency or instrumentality thereof (e.g., employees of a national bank), regardless of physical location;
- (b) any officer or employee of a non-U.S. state-owned or controlled enterprise or fund (e.g., public utility or government pension fund) or a financial institution controlled by a foreign government (for example, international banks which, as a result of government investment during the economic crisis in recent years, are now controlled by foreign governments or foreign government bodies);
- (c) any officer or employee of a public international organization (e.g., the International Monetary Fund, the World Bank, or the European Union);
- (d) any person acting in an official capacity for or on behalf of any non-U.S. government, any department, agency, or instrumentality thereof, or any public international organization (e.g., an official advisor or other third party hired by a government);
- (e) any non-U.S. political party or party official or any candidate for non-U.S. political office;
- (f) members of a royal family.

The FCPA focuses on the purpose of the payment instead of the particular duties of the official receiving a payment, offer or promise of payment.

While the FCPA addresses the bribery of foreign government officials, many countries have general commercial anti-bribery laws prohibiting such payments to anyone, whether a government official or not. The Financial Crime Officer should be consulted concerning whether such laws apply in connection with non-U.S. commercial activities.



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APPENDIX B - COMMON BRIBERY "RED FLAGS"

Below are common "red flags" with respect to dealings with third parties (e.g., agents, consultants, joint venture partners) that may indicate risk of improper payments. These and other "red flags" may appear during due diligence conducted before a third-party relationship is established, or may appear during the course of the relationship. The presence of a "red flag" does not mean that the relationship cannot go forward, but does require caution, and calls for appropriate investigation and resolution before proceeding. Following up red flags is particularly important because judgments as to whether one had "knowledge" of an improper payment invariably will be made after the fact with the benefit of hindsight.

- 1) The third party operates from a country with a general reputation for bribery and corruption or an investment of Equitable Holdings funds is to be made in such a country. The Transparency International Corruption Perception Index is a good resource: http://www.transparency.org/policy_research/surveys_indices/cpi
- 2) The reputation and integrity of the third party is questionable or the third party has a reputation for making deals that no one else can.
- 3) The third party has failed to make full and accurate disclosure during the due diligence process.
- 4) The third party is assisted by undisclosed "sub-agents" or "subcontractors," or appears to lack the qualifications or resources needed to perform the services offered.
- 5) The third party has close affiliations with a relevant non-U.S. government or its officials.
- 6) The third party has a family member or relative who is a senior official in the non-U.S. government or ruling political party or who is a candidate for political office.
- 7) The third party has been recommended to an Equitable Holdings Person by a non-U.S. official.
- 8) The third party makes reference to the need to make "political contributions."
- 9) The investment or business arrangement at issue is prohibited under the laws, regulations, administrative requirements or policies of the country in which the business is being done, or the proposed payments exceed the permissible levels established by local law.
- 10) The third party has expressed concern about providing an FCPA certification or has stated that the third party will not represent or warrant that it has not violated and will not violate the FCPA.
- 11) A proposed commission/fee/payment requested appears unusually high and without a corresponding level of services, or a significant fee increase or payment is requested when a decision impacting the investment is imminent (i.e., when there is little time to perform significant additional services one's suspicions should be raised that a bribe is involved).
- 12) The third-party requests payments in cash or by an unusual method of payment (e.g., wire transfer to



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an account or bank located in a country unrelated to the third party or known for its bank secrecy laws).

13) The third party provides photocopies of receipts (not original receipts), or its expense and accounting records are not transparent and straightforward.



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APPENDIX C - Equitable Holdings GIFTS AND ENTERTAINMENT (G&E) GUIDE AND APPROVAL FORM

This guide sets out Equitable Holdings rules regarding G&E. In addition to this guide, there are certain department policies that have more stringent rules regarding G&E ("Department Gift Policies"). **It is your responsibility to comply with the Department Gift Policies that apply to you.**

Persons considered "covered persons" subject to the Equitable Advisors Firm Element Training Program and persons who are Field employees should follow the G&E policies of Equitable Advisors **in lieu of this G&E Guide.**

Persons subject to the G&E policies of Equitable Distributors should follow those policies **in lieu of this G&E Guide.** Equitable Distributors' employees who are not in a sales role follow EDL G&E dollar limit policies but use attached G&E Approval form for tracking and approval.

Persons subject to the G&E policies of FMG should follow those policies **in lieu of this G&E Guide.**

Corporate Sourcing and Procurement (CSP) personnel are to follow their procurement policy when **receiving G&E in lieu of this Guide.**

In addition, this Guide is not meant to cover employee-to-employee G&E. Please refer to the Gifts and Recognition Policy in the HR Employee Handbook **in lieu of this Guide.**

Important - just because proposed G&E has been approved under this G&E Guide or other G&E policies does not mean the G&E will be reimbursed. Reimbursement policies and thresholds must still be followed.

Under this Guide, G&E may be given or received as follows:

- 1) The value does not exceed \$100.
- 2) If the value exceeds \$100, then G&E must be approved by your manager (Senior Director or above) using the attached G&E Approval Form and maintained in the Department.
- 3) If the value exceeds \$250, then approval is required from your manager (Senior Director or above) using the attached G&E Approval Form, and the approval must be sent to the Financial Crime Office.
- 4) For G&E that exceeds \$500, your manager (Senior Director or above) and the Department's Managing Director or above must approve **before the G&E is given or received using** the G&E Approval Form, and the approval must be sent to the Financial Crime Office.
- 5) In your reasonable judgment, the G&E (at any value) does not constitute a real or perceived conflict of interest and is not otherwise inappropriate.
- 6) Any G&E should not be so frequent as to give rise to a real or perceived conflict of interest.

The following G&E are *never* appropriate:

- 1) G&E given as a bribe, payoff or kickback.



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- 2) Cash gifts or cash equivalents (e.g., money orders, checks, travelers checks, or gift checks).
- 3) Gifts given in the form of services or other non-cash benefit (e.g., the promise of employment).
- 4) Entertainment that can be viewed as excessive in the context of the business occasion.
- 5) "Adult" entertainment or any sort of event involving lewd behavior.

G&E received or offered exceeding applicable limits must be returned or declined. If it is not feasible to return the G&E, the Financial Crime Office should be notified and the item(s) should be distributed within your department.

Any proposed payment or gift to a government official must be pre-approved by the Financial Crime Office, even if such payment has been made or approved in the past.

Workplace Essentials > [Forms](#) > Gift and Entertainment Approval Form



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APPENDIX D - LIST OF DEPARTMENT GIFT POLICIES

The list below is not exhaustive. If you are unsure if additional gift policies apply to you, speak with your manager or contact the Financial Crime Office.

Policy Name	Applicability
Equitable Holdings	
Procurement: Equitable Holdings Policy Statement on Procurement Ethics <i>(Receiving)</i>	Employees in Corporate Sourcing & Procurement.
Equitable's Recognition Policy <i>(Giving)</i>	All Equitable employees. Note, Equitable Advisors FPs to follow Equitable Advisors Compliance Manual.
Equitable Policy on Business Meals and Entertainment <i>(Giving)</i>	All Equitable employees. Important: Equitable's expense reimbursement approval limits differ from the G&E guide approval limits and may not automatically qualify for reimbursement Equitable Advisors FPs to follow Equitable Advisors Compliance Manual.
Equitable Foundation Matching Gifts Program <i>(Giving)</i>	Corporate and employee charitable contributions.
Equitable Advisors Policies	
Equitable Advisors Compliance Manual – Chapter 5	All Equitable Advisors "Associates", supervisors, and FINRA registered personnel. Includes Cash and Non-Cash Compensation Policy
Equitable Distributors	
Equitable Distributors Compliance Manual	All Equitable Distributors supervisors and FINRA registered personnel.
Funds Management Group	
Code of Ethics	The EQ Advisors Trust and the Equitable Premier VIP Trust (collectively the "Funds"), FMG LLC (in its capacity as the "Investment Manager" to the Funds and as a registered investment adviser), and Equitable Distributors, LLC (in its capacity as the distributor of the Funds).

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