



EQUITABLE

Anti-Bribery Policy

September 2022

Purpose, scope, and responsibility

Equitable has built a strong reputation for being an ethical, trustworthy company. Equitable prohibits its employees, officers, and its financial professionals (“Equitable Persons”) from making or receiving bribes or engaging in any activity that could give rise to the perception of that impropriety.

The Anti-bribery policy establishes principles that must govern our conduct in order to: a) conform to the U.S. Foreign Corrupt Practices Act (FCPA) and similar anti-corruption laws and b) more broadly, reinforce our intention and obligation to act honestly and ethically in all of our business dealings.

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 Equitable’s Gift & Entertainment Policies, and are properly recorded in accordance with Equitable’s 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
- the use of any legal fast-track process which is available to all on payment of a fee.

Policy Statement

Equitable is committed to fully complying with applicable anti-bribery laws, including the Foreign Corruption Practices Act (FCPA). Equitable expects all Equitable Persons to conduct business legally and ethically. Bribery is entirely contrary to the Company’s principles and approach to doing business.

Equitable prohibits Equitable 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 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 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.

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 Person does not actually have to make or accept a bribe to violate Equitable 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:

- 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’s reputation and relationships with its clients and regulators and could subject Equitable and responsible individuals to criminal and civil liability.



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Facilitation payments are any payment made (except where comprised in a lawful and published tariff of general application) as an inducement to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal entitlement. These are not permitted or condoned by Equitable.

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 Political Activity Policy.

Accountabilities

Equitable's goal is to limit its exposure to bribery by:

- Setting out a clear Anti Bribery policy that includes the Gifts & Entertainment Approval Guide (G&E) and due diligence on Third Party Relationships for assurance suppliers have appropriate anti-bribery policies in place;
- Understanding risk exposure to bribery through a formal risk assessment process;
- Training employees so that they can recognize and avoid the use of bribery by themselves and others;
- Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Formal investigation of instances of alleged bribery and applicable reporting, including ongoing assistance to the appropriate authorities;
- Taking firm and vigorous action against any individual(s) involved in bribery.

Equitable Persons are responsible for promptly raising concerns, about any possible misconduct related to any Equitable Standards policy or any bribery or corruption law before problems develop. This includes the potential misconduct of Equitable Persons at all levels, consultants, third parties, and contractor temporary workers. Failure to escalate can give rise to charges of "Willful Blindness. Escalations can be made directly to Equitable's General Counsel, Head of the Financial Intelligence Unit, or by calling Equitable's Ethic Hotline at (844) 977-0471

Equitable Persons may be subject to disciplinary action; which may include suspension or termination of employment or association with Equitable ; if the Policy is violated, a false report is made, or failure to cooperate fully in an investigation of a possible or actual violation.



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