



EQUITABLE

Equitable Political Engagement Statement

This Statement applies to the subsidiaries of Equitable Holdings, Inc. comprising its Equitable franchise, including Equitable Financial Life Insurance Company, Equitable Financial Life Insurance Company of America, and Equitable Advisors, LLC (collectively referred to herein as "Equitable") and to Equitable Holdings, Inc. where specified. It does not apply to AllianceBernstein L.P., AllianceBernstein Holding L.P., and their subsidiaries (collectively, "AB"). For information relating to AB, please review AB's Statement on Political Neutrality at <https://www.alliancebernstein.com/content/dam/corporate/corporate-pdfs/ab-statement-of-political-neutrality.pdf>

Equitable believes that it is important to maintain constructive dialogue through active engagement with federal, state, and local government officials on issues that affect the financial and retirement security of Americans, and with respect to a wide array of issues that impact our ability to serve our clients and other stakeholders, such as insurance and securities laws and regulations and tax policy. These activities are undertaken in compliance with applicable laws and regulations and in accordance with the Equitable Holdings, Inc. Code of Business Conduct and Ethics, which is available on our Investor Relations site, ir.equitableholdings.com. This Statement provides further details on Equitable's policies and practices concerning political engagement, including contributions and lobbying activity.

Equitable does not make political contributions using corporate funds. Equitable Holdings, Inc. and Equitable do not use corporate funds to make political contributions, or make in-kind contributions, supporting or opposing the election of any candidate for public office or any ballot initiative. This includes the use of corporate funds to make contributions to political action committees ("PACs") or super PACs, or to make independent expenditures in support of or opposition to any candidate or ballot initiative.

Equitable Holdings, Inc. sponsors a PAC funded solely through employee and Equitable Advisors financial professional contributions. Equitable Holdings, Inc. Political Action Committee ("Equitable PAC") makes contributions, on a bipartisan basis, to candidates for U.S. Congress, federal political party committees and legislative leadership committees, and federal PACs who share and promote policy positions supported by Equitable. Equitable PAC does not make contributions to candidates for U.S. President or to candidates for state or local office, state or local political party committees, or state or local PACs. Equitable PAC also does not make independent expenditures in support of or opposition to any candidate or ballot initiative. Equitable PAC is funded solely by voluntary contributions from eligible employees and Equitable Advisors financial professionals. Recipients of contributions from Equitable PAC are determined by Equitable PAC's Steering Committee, which is made up of senior Equitable employees. Contributions are reviewed for compliance with applicable laws and regulations by the Equitable

Law Department and approved by the Steering Committee. Equitable PAC's reports and disclosures to the Federal Election Commission may be viewed at <http://www.fec.gov>.

Equitable engages with government officials on issues affecting our business. Equitable engages in lobbying activity, both directly by our employees and through lobbying and government affairs firms we retain, with respect to issues that impact Americans' financial and retirement security and our business, including but not limited to insurance and securities laws and regulations, and tax policy. In addition, Equitable, as a provider of retirement and employee benefits products and services to state and local government entities, engages in sales activity, including meetings with and presentations to government officials, that may be regulated as lobbying activity in certain jurisdictions. In all cases, Equitable complies with applicable laws and regulations, including registering and reporting in those jurisdictions where we are required to do so.

Equitable belongs to trade associations that promote our industry. Equitable belongs to national and state trade associations in the insurance and financial services sectors that promote our industry and advocate on issues of importance to our clients and our business with government officials. In addition, these trade associations provide valuable business and regulatory guidance and expertise to their members.

Governance and disclosure. Equitable's political engagement, including the activities of Equitable PAC, and lobbying activities are overseen by the Equitable Law Department and the Chief Legal Officer of Equitable Holdings, Inc. On at least an annual basis, we will provide the Nominating and Corporate Governance Committees of the Equitable Holdings, Inc. and Equitable Financial Life Insurance Company Boards of Directors, which are comprised entirely of independent directors, a report on Equitable's political activities during the preceding calendar year. A copy of this annual report will be made publicly available on Equitable Holdings, Inc.'s Investor Relations site at ir.equitableholdings.com.

Effective as of September 21, 2021