



STATEMENT ON POLITICAL INFLUENCE

GUIDING PRINCIPLE

As a responsible investor with a global footprint, AllianceBernstein (AB) is committed to serving our clients' and shareholders' needs, building sustainable financial markets, and creating better outcomes for people and the world.

CORPORATE POLITICAL ADVOCACY

Our advocacy decisions are informed by research-driven insight; they focus on topics that advance these commitments to our clients, our industry and the world. Specifically, we support public policy and legislation that ensure fairness and best practices in investment management, mutual funds and other investment vehicles and retirement savings. This support includes advocacy for effective corporate governance and standardized environmental, social and governance measurement.

CORPORATE POLITICAL SPENDING

To avoid potential conflicts of interest between our firm and our clients, employees, and shareholders, AB does not contribute

corporate funds or make in-kind contributions in any country at any level of government to candidates, political party committees, ballot committees, political action committees or any political organization—even when permitted to do so by applicable law.

EMPLOYEE POLITICAL ACTIVITY

Employees may generally make contributions to the political candidates or organizations of their choice. From time to time, these contributions may include donations to industry associations and/or political action committees (for example, those associated with the Investment Company Institute or Securities Industry and Financial Markets Association) to advance the sustainability of financial markets and the asset-management industry.

All individual political contributions are the private matters of employees. However, all employees must submit for review all proposed political contributions to determine if they're consistent with our policy and procedures relating to pay-to-play laws and political contributions.

