



ALLIANCEBERNSTEIN®

April 2025



Sustainability Accounting Standards Board (SASB) Disclosures

Asset Management & Custody Activities

AllianceBernstein (AB) presents our 2024 SASB Disclosures. These disclosures cover a range of environmental, social and governance (ESG) topics that are material to specific industries; in our case, asset management and custody activities.

| Accounting Metric | Code | Disclosure |
|---|----------------|--|
| Transparent Information & Fair Advice for Customers | | |
| (1) Number and (2) percentage of covered employees with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings ¹ | (FN-AC-270a.1) | Of the 1,127 registered employees at AB, zero employees, or 0% of the total registered, had a disclosure event in 2024. Per SASB guidance, disclosures include investment-related investigations, consumer-initiated complaints, private civil litigations or other regulatory proceedings. |
| Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of financial product-related information to new and returning customers ² | (FN-AC-270a.2) | AB has not had any monetary losses as a result of legal proceedings associated with the marketing and communication of financial product-related information to new and returning customers. |
| Description of approach to informing customers about products and services | (FN-AC-270a.3) | Informing customers about products and services is of the utmost importance to AB in building customer relationships based on trust. Please see Appendix A for more details on our approach. |
| Employee Diversity & Inclusion | | |
| Percentage of (1) gender and (2) diversity group representation for (a) executive management, (b) non-executive management, (c) professionals, and (d) all other employees ³ | (FN-AC-330a.1) | <p>AB strives to create an environment in which every person has the opportunity to succeed based on merit, regardless of race, color, religion, creed, ancestry, national origin, sex, age, disability, marital status, citizenship status, sexual orientation, gender identity expression, military or veteran status, or any other criterion. In our experience, we believe diversity of thought and backgrounds leads to better outcomes on behalf of our clients.</p> <p>We continue to focus on offering managerial training, fostering employee resource groups to instill an inclusive culture, and strengthening our relationships with future emerging talent to create strong talent pipelines within our local communities.</p> <p>AB also recognizes the importance of carving and strengthening pathways for talent within the firm, so we've implemented a series of initiatives aimed at providing both individuals and managers with the tools they need to effectively manage their career development.</p> <p>We seek to position AB for success when competing in an increasingly interconnected world.</p> <p>Our EEO-1 Data can be found here.</p> |

¹ Note to FN-AC-270a.1—The entity shall describe how it ensures that covered employees file and update FINRA and SEC forms in a timely manner.

² Note to FN-AC-270a.2—The entity shall briefly describe the nature, context, and any corrective actions taken as a result of the monetary losses.

³ Note to FN-AC-330a.1—The entity shall describe its policies and programs for fostering equitable employee representation across its global operations.

| Accounting Metric | Code | Disclosure | | | | | | | | | | | | | | | | | | | | | | | | |
|--|-----------------|---|--------------------------|-----------------|--------------------------------|-----------------|------------------------------|----------------|--------|-----------------|--------------------------|----------------|--------------------------------|---------------|------------------------------|---------------|--------|----------------|---------|----------------|---------------|-----------------|------------------------------|----------------|--------|-----------------|
| Incorporation of Environmental, Social, and Governance Factors in Investment Management & Advisory | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Amount of assets under management, by asset class, that employ (1) integration of environmental, social, and governance (ESG) issues, (2) sustainability themed investing, and (3) screening | (FN-AC-410a.1) | <p>AB became a signatory to the Principles for Responsible Investment (PRI) in 2011. This began our journey to formalize our approach to identifying ways to unlock opportunities for our clients by developing differentiated ESG-related insights and integrating material ESG considerations throughout most of our actively managed strategies—a practice that continues today. Because we’re an active manager, integrating material ESG factors is fundamental to our responsible research and investment processes, representing 78.8% of our actively-managed AUM as of 12/31/24.</p> <p>For clients wishing to achieve financial objectives with a dedicated ESG focus, we’ve developed a platform, Portfolios with Purpose, which includes our Sustainable, Responsible+ and Impact strategies and totals \$27.0 billion in AUM as of 12/31/24.</p> <p>AUM that integrate ESG considerations as of 12/31/24:</p> <table><tr><td>Actively Managed Equity:</td><td>\$255.1 billion</td></tr><tr><td>Actively Managed Fixed Income:</td><td>\$258.3 billion</td></tr><tr><td>Multi-Asset and Alternative:</td><td>\$41.5 billion</td></tr><tr><td>Total:</td><td>\$555.0 billion</td></tr></table> <p>Portfolios with Purpose as of 12/31/24:</p> <table><tr><td>Actively Managed Equity:</td><td>\$22.9 billion</td></tr><tr><td>Actively Managed Fixed Income:</td><td>\$2.2 billion</td></tr><tr><td>Multi-Asset and Alternative:</td><td>\$1.8 billion</td></tr><tr><td>Total:</td><td>\$27.0 billion</td></tr></table> <p>Strategies, funds and accounts with explicit ESG screens as of 12/31/24:</p> <table><tr><td>Equity:</td><td>\$89.4 billion</td></tr><tr><td>Fixed Income:</td><td>\$147.4 billion</td></tr><tr><td>Multi-Asset and Alternative:</td><td>\$19.1 billion</td></tr><tr><td>Total:</td><td>\$255.9 billion</td></tr></table> | Actively Managed Equity: | \$255.1 billion | Actively Managed Fixed Income: | \$258.3 billion | Multi-Asset and Alternative: | \$41.5 billion | Total: | \$555.0 billion | Actively Managed Equity: | \$22.9 billion | Actively Managed Fixed Income: | \$2.2 billion | Multi-Asset and Alternative: | \$1.8 billion | Total: | \$27.0 billion | Equity: | \$89.4 billion | Fixed Income: | \$147.4 billion | Multi-Asset and Alternative: | \$19.1 billion | Total: | \$255.9 billion |
| Actively Managed Equity: | \$255.1 billion | | | | | | | | | | | | | | | | | | | | | | | | | |
| Actively Managed Fixed Income: | \$258.3 billion | | | | | | | | | | | | | | | | | | | | | | | | | |
| Multi-Asset and Alternative: | \$41.5 billion | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total: | \$555.0 billion | | | | | | | | | | | | | | | | | | | | | | | | | |
| Actively Managed Equity: | \$22.9 billion | | | | | | | | | | | | | | | | | | | | | | | | | |
| Actively Managed Fixed Income: | \$2.2 billion | | | | | | | | | | | | | | | | | | | | | | | | | |
| Multi-Asset and Alternative: | \$1.8 billion | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total: | \$27.0 billion | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Multi-Asset and Alternative: | \$19.1 billion | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total: | \$255.9 billion | | | | | | | | | | | | | | | | | | | | | | | | | |
| Description of approach to incorporation of environmental, social, and governance (ESG) factors in investment and/or wealth management processes and strategies | (FN-AC-410a.2) | <p>AB became a signatory to the Principles for Responsible Investment (PRI) in 2011. This began our journey to formalize our approach to identifying ways to unlock opportunities for our clients by developing differentiated ESG-related insights and integrating material ESG considerations throughout most of our actively managed strategies—a practice that continues today. We work to understand our clients’ needs—engaging with them and their advisors to better understand how we may align with their responsible investing preferences and help them meet their governance and regulatory obligations. Integration begins with equipping our investment teams with the education, tools and processes to understand, research and integrate material ESG factors.</p> <p>Our investment teams generally have access to a range of resources, including proprietary platforms, third-party data and research, strategic partnerships, and extensive training programs, which investment teams can use to identify and assess material ESG risks and opportunities and identify and respond to market-wide and systemic risks. Our investment teams also engage with issuers on material ESG risks and opportunities to learn more about their corporate strategies and competitive positioning or to encourage action to better address material risks and take advantage of ESG opportunities. By sharing research insights across investment teams, we seek to leverage our ESG expertise firmwide. Armed with this knowledge, our investment teams integrate material ESG factors into their decision-making processes, where applicable. All engagements are conducted from a fiduciary perspective in accordance with relevant market regulations and frameworks. We operate as a “passive” investor (i.e., not an activist investor) for the purposes of the SEC’s Regulation 13D-G.</p> <p>Ultimately, putting AB investment teams at the heart of our stewardship activities enables us to integrate material ESG factors into each applicable step of our research and investment processes, driving more complete consideration of these issues in investment decisions. For a detailed overview of AB’s approach to ESG integration and its implementation, please see our annual Global Stewardship Statement and Report.</p> | | | | | | | | | | | | | | | | | | | | | | | | |

| Accounting Metric | Code | Disclosure |
|---|----------------|--|
| Description of proxy voting and investee engagement policies and procedures | (FN-AC-410a.3) | <p>Proxy Voting</p> <p>We actively exercise our right to vote proxies, and we have a robust rules- and principles-based global in-house Proxy Voting and Governance Policy and process that is applicable to our voting activities across geographies. We make investment and proxy-voting decisions in our clients' best interests. We support strong corporate governance structures, shareholder rights and transparency.</p> <p>Our internally managed assets are covered by our policy. AB has authority to vote proxies relating to securities in certain client portfolios across active and passive strategies. Accordingly, AB's fiduciary obligations extend to our exercise of such proxy-voting authority for each client for which we have agreed to exercise that duty. Our policy is to vote all proxies in a timely manner, for the full number of shares, for all securities held in client accounts for which we have proxy-voting authority, whenever it is administratively and logistically possible to do so. Where clients have specifically requested to override our house policy, we have the ability to arrange such measures on a best-efforts basis. If clients have retained voting authority, they can vote their shares, but if AB has authority, we generally do not allow clients to direct voting. We check our holdings as of the record date when we execute votes on all our holdings.</p> <p>We also have a weekly reconciliation process to identify missed and failed votes due to operational challenges, including administrative requirements from different markets or issuers that may prevent us from voting.</p> <p>Our policy details how we vote on specific items, as well as the processes for managing conflicts of interest, voting transparency, recordkeeping and voting execution. Our proxy-voting guidelines are both rules- and principles-based. We adhere to a core set of principles and assess each proxy proposal according to these principles. Because we do not outsource our proxy-voting activities, we do not use the default recommendations of proxy advisors.</p> <p>Our proxy-voting results can be found in our annual Global Stewardship Statement and Report.</p> <p>Engagement</p> <p>We're an active investment manager, so engaging stock and bond issuers on material financial issues—including ESG risks and opportunities—is fundamental to our responsible research and investment processes for most of our actively managed strategies. When it is in our clients' best financial interest, we engage with issuers through ongoing, open dialogue. Because engagement is important to ESG integration and asset stewardship, we do not outsource it. AB investment professionals engage directly with companies or issuers, often collaborating with our Responsible Investing team.</p> <p>We engage with issuers for two main reasons: to generate research insights (e.g., to learn more about an issuer's corporate strategies and competitive positioning) or for action (e.g., to encourage issuers to better address material ESG risks or take advantage of ESG opportunities, in our clients' best interests). In our view, hands-on engagement can drive better research and outcomes. Engagement, simply put, can help create long-term value for our clients. Our complete engagement policy and an overview of our annual engagements can be found in our annual Global Stewardship Statement and Report.</p> |
| Business Ethics | | |
| Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations ⁴ | (FN-AC-510a.1) | AB has not had any monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations. |

⁴ Note to FN-AC-510a.1—The entity shall briefly describe the nature, context, and any corrective actions taken as a result of the monetary losses.

| Accounting Metric | Code | Disclosure |
|---|----------------|---|
| Description of whistleblower policies and procedures | (FN-AC-510a.2) | <p>AB is committed to an environment in which open and honest communications are the expectation—not the exception. AB employees have several pathways for securely reporting and escalating ethical, compliance or other concerns, including:</p> <ul style="list-style-type: none"> • Formal reporting channels (a supervisor or manager) or the AB Compliance Department, General Counsel's Office or Head of Audit • The AB Ombuds Office—a confidential channel to get help on ethics-related issues or questionable practices • EthicsPoint—a third-party service that gives our employees, customers, suppliers and other stakeholders a secure online way to report potential ethics and compliance issues quickly, easily and anonymously (if desired). |

| Activity Metric | Code | Disclosure/Source | | | | | | |
|--|-----------------|--|-------------|-----------------|---------------|-----------------|--------|-----------------|
| Assets Under Management and Custody | | | | | | | | |
| Total Assets Under Management (AUM) ⁵ | FN-AC-000.A | <p>AB's AUM comprises registered and unregistered AUM. Registered AUM include those subject to the regulations of the Investment Company Act of 1940 (1940 Act), such as mutual funds, managed under the Employee Retirement Income Security Act of 1974 (ERISA), subject to the Undertakings for Collective Investment in Transferable Securities (UCITS) Directive, or managed under the Commodity Futures Trading Commission's (CFTC's) Commodity Pool Operator (CPO) regulations. Unregistered AUM are those that do not fall under the definition of the registered AUM.</p> <p>Assets Under Management as of 12/31/24:</p> <table><tr><td>Registered:</td><td>\$309.5 billion</td></tr><tr><td>Unregistered:</td><td>\$482.7 billion</td></tr><tr><td>Total:</td><td>\$792.2 billion</td></tr></table> | Registered: | \$309.5 billion | Unregistered: | \$482.7 billion | Total: | \$792.2 billion |
| Registered: | \$309.5 billion | | | | | | | |
| Unregistered: | \$482.7 billion | | | | | | | |
| Total: | \$792.2 billion | | | | | | | |
| Total assets under custody and supervision | FN-AC-000.B | <p>AB has some assets under custody, which include all securities and cash associated with securities transactions that are held on behalf of the private-client accounts for which we act as a custodian.</p> <p>Assets under Custody as of 12/31/24: \$128.5 billion</p> <p>Assets under Supervision: N/A</p> | | | | | | |

⁵ Note to FN-AC-000.A—Registered AUM include those subject to the regulations of the Investment Company Act of 1940 (1940 Act), such as mutual funds, managed under the Employee Retirement Income Security Act of 1974 (ERISA), subject to the Undertakings for Collective Investment in Transferable Securities (UCITS) Directive, or managed under the Commodity Futures Trading Commission's (CFTC's) Commodity Pool Operator (CPO) regulations. Unregistered AUM are those that do not fall under the definition of the registered AUM.

Appendix A

FN-AC-270a.3

Description of approach to informing customers about products and services

AB provides diversified investment-management and related services globally to a broad range of clients through three businesses: Institutional, Retail (US and non-US) and Private Client/High Net Worth. Across these businesses, clients include private and public pension plans, foundations and endowments, insurance companies, central banks and governments worldwide, and our affiliates (Institutional); banks, brokerage platforms, Registered Investment Advisors and other financial intermediaries (Retail); and high-net-worth individuals and families, trusts and estates, charitable foundations, partnerships, private and family corporations, and other entities, including smaller institutions (Private Wealth).

General Approach: AB communicates with our clients using various communication methods and processes, depending on the business, information being communicated, type of client, client domicile, type of account, investment strategy being used and investment vehicle, all of which can vary according to the prevailing regulatory framework.

Type and Frequency of Communications: Depending on their preference, clients serviced through our Institutional business and/or Bernstein Private Wealth business receive, monthly or quarterly, portfolio appraisal reports and summaries, purchase and sales reports, performance reviews, and transactions summaries. Upon request, confirmations of trades can be sent to clients or their custodian banks on a trade-by-trade, monthly, quarterly or semiannual basis. Additionally, AB produces custom reports tailored to meet specific client requirements. AB encourages our Relationship Managers and Advisors to engage in frequent reviews with their clients, particularly early in the relationship. Formal performance reviews are generally held or offered quarterly. We also respond to special requests by our clients for ad hoc reports related to activity in their account.

Value-Added Communications: AB seeks to add additional value-added insights, perspectives and services for our clients. Context, our blog on investing, offers our firm's current research insights in a concise format across various multimedia formats, customized regionally. AB IQ is our digital newsletter for our clients that explores an overarching theme or trend, sometimes in tandem with other institutional investors we have invited as co-authors to provide our clients with a range of diverse perspectives. We publish longer-form thought leadership via white papers, research articles and economic

perspectives on topics of interest to our clients. We collaborate with our clients on workshops to share best practices and provide opportunities for networking with partners in the industry. Our latest Climate Change and Investment Academy, which we co-developed with Columbia Climate School, has provided training to a global cohort of more than 1,200 clients, other asset owners and intermediaries on a series of key climate finance issues and research. AB looks forward to continuing to use our platform to add value for our clients and the asset-management industry more broadly.

Communications Principles and Protocols: AB follows strict protocols regarding the development and dissemination of marketing materials related to AB funds and services. Our various policies and procedures reflect the regulatory requirements imposed on the creation and dissemination of those materials as well as our firm's standards for such materials. In addition to defining many of the general principles, including both prohibited and permissible information/data, our policies and procedures also require that most materials be reviewed by our Legal and Compliance Department prior to use. Marketing materials concerning AB's various funds, as well as our institutional services, are reviewed by our Legal and Compliance staff located in regions around the world. One reason for locating our Legal and Compliance Department in various regions is to help ensure that our staff are well-versed in local regulatory requirements. In addition, all performance-related information is provided by our independent Performance Measurement Group and may not be modified by investment or marketing personnel without the written approval of the Legal and Compliance Department. Furthermore, our policies and processes regarding the preparation and review of our marketing materials and performance analytics are included within the scope of the periodic internal audits our firm's Internal Audit Department performs. Additionally, AB maintains a separate ESG Compliance Program to help ensure that we are accurately disclosing our ESG investing approaches, and that our firm's policies, procedures and practices are in alignment with the ESG-related disclosures we make in marketing materials and other documents. Our ESG Compliance Program applies to our firm's ESG-focused strategies and funds ("Portfolios with Purpose") as well as to our actively managed strategies that integrate material ESG factors into their investment processes. AB's ESG Compliance Program is intended to ensure that we maintain our vigorous fiduciary culture by always placing the interests of our clients first and treating all our clients fairly and equitably. AB developed this program in response to the increased focus of clients and regulators in this area.

Client Information Available on Our Website:

AB provides a wide range of information to clients via our public website, alliancebernstein.com. Our website is customized for both region and client type, with protocols for the type and delivery of content managed accordingly. AB maintains a wide range of ESG-related documents for our clients on our website, including our annual [Global Stewardship Statement and Report](#), a comprehensive overview of our activities in responsible investing and stewardship, which we produce to comply with various Stewardship Codes globally. We publish an annual [Responsibility Report](#) that outlines how we as a firm are addressing both corporate responsibility and responsible investing in our day-to-day business. We publish our entire annual [PRI Public Transparency Report](#) on our website as well as our annual [PRI Assessment Report](#), including our company scores and ratings. We publish proxy-voting records on our [website](#) for issuers held across accounts where we have voting authority on behalf of our clients.

Additional Information Provided to Clients:

Form ADV: AllianceBernstein L.P., along with its affiliated investment advisers, files an annual amendment to our Form ADV Part 1 and Part 2A (Brochure) each year. All scheduled annual Form ADV updates,

along with interim updated ADV filings, are posted on our public website and are also made available to our Client Reporting staff, who include them in the appropriate client statement mailings.

Code of Ethics Disclosure: AB maintains a Code of Business Conduct and Ethics (the "Code"), which complies with Rule 17j-1 under the Investment Company Act of 1940, as amended, and Rule 204A-1 under the Investment Advisers Act of 1940. The Code summarizes our firm's values and principles and the business practices that guide our business conduct.

Conflicts Disclosure: AB has an "Approach to Potential Conflicts" disclosure, which summarizes the firm's conflict management plan. It is meant to provide our employees, clients and prospective clients with a summary description of the conflicts and potential conflicts we may encounter, and outlines the policies and procedures AB maintains for managing those conflicts. Clients can access a detailed account of our approach in AllianceBernstein's Form ADV Part 2.

Our ADV, which includes our Conflicts Disclosure, and our Code of Ethics are available at alliancebernstein.com.

AllianceBernstein Investments, Inc. (ABI) is the distributor of the AB family of mutual funds. ABI is a member of FINRA and is an affiliate of AllianceBernstein L.P., the manager of the funds.

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