

AXA EQUITABLE HOLDINGS, INC. REPORTING MISCONDUCT POLICY

Effective as of May 9, 2018

AXA Equitable Holdings, Inc. (the “Company”) is committed to high standards of ethical, honest and legal business conduct. In line with this principle and our commitment to open communication, this policy provides for the reporting of Misconduct or Allegations (as such terms are defined below) and prohibits retaliation against those that report Misconduct or make other Allegations.

This policy is intended to comply with the requirements of Section 301 of the Sarbanes-Oxley Act of 2002, Section 922 of the Dodd-Frank Act of 2010, and the New York Stock Exchange’s corporate governance standards for listed companies.

Definitions

“Accounting Misconduct” means:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company or one of its subsidiaries;
- fraud or deliberate error in the recording and maintaining of financial records of the Company or one of its subsidiaries;
- deficiencies in, or non-compliance with, the Company’s or one of its subsidiary’s internal accounting controls;
- misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company or one of its subsidiaries; or
- deviation from full and fair reporting of the Company’s or one of its subsidiary’s financial condition.

“Allegations” means reports made by an AEH Person of suspected inappropriate, unethical or illegal behavior of another AEH Person, including, but not limited to, Accounting Misconduct, and Expense Reporting Misconduct

“AEH” or the “Company” means AXA Equitable Holdings, Inc.

“AEH Person” means any employee, officer, director or financial professional of AEH or one of its subsidiaries,¹ or any person or entity acting on their behalf.

“Expense Reporting Misconduct” means submitting expenses for reimbursement to which the AEH Person is not entitled, including inflating mileage, submitting a personal trip as a business expense or disguising an illegitimate expense as a business expense.

“Misconduct” means any practice or action which is inappropriate or inconsistent with any of AEH’s policies and/or applicable law, and includes Accounting Misconduct, and Expense Reporting Misconduct.

“Whistle-blowing” means an AEH Person making a protected disclosure under applicable law about Misconduct.

¹ For purposes of this policy, the term “subsidiary” does not include AllianceBernstein Holding L.P., AllianceBernstein L.P. and any of their subsidiaries.

Scope

This policy applies to all AEH Persons and is meant to govern the obligations and procedures related to reporting Misconduct and Allegations.

Policy Statement

Reporting

All AEH Persons are encouraged to promptly report Misconduct and Allegations. Those in management positions or in human resources have a heightened duty to report Misconduct and Allegations that are brought directly to their attention or about which they become aware.

Retaliation

No AEH Person shall:

- discriminate, harass or retaliate against any individual that reports Misconduct or Allegations or participates in the investigation of Misconduct or Allegations; or
- make a report in bad faith or otherwise abuse the reporting system set forth in this policy.

Any AEH Person who: (i) is involved in discrimination, harassment or retaliation against those who make reports in good faith, (ii) makes a report in bad faith or (iii) otherwise abuses the reporting system set forth in this policy will be subject to disciplinary action up to and including dismissal.

Reporting Procedures

As a general matter, if an AEH Person has any questions or concerns about possible Misconduct and Allegations, the AEH Person is encouraged to speak with his or her supervisor or with a representative of AEH's Internal Audit Department, Financial Security Office ("Fraud Hub"), Human Resources Department, or Law Department. AEH Persons can also call the Ethics Hotline or Fraud Hotline (see below for details). In making the report, the AEH Person should make all efforts to focus on the factual situation that he or she believes is inconsistent with the policies, or are otherwise inappropriate, unethical or illegal. The report should contain as much specific information as possible to allow an adequate assessment of the nature, extent and urgency of the situation, and should be documented, as far as possible.

Anonymous reporting of any Misconduct or Allegations may be made by:

- calling the **Ethics Hotline at 1-800-554-1503**,
- calling the **Fraud Hotline at (212) 314-6600**,
- submitting a **Fraud Form**, available on AEH's intranet, or
- submitting an **Ethics Hotline and Suspected Violation Reporting Form** available on AEH's intranet and in PDF format to financial professionals on us.axa.com.

The **Fraud Form** may be mailed directly to AEH's Chief Auditor at:

Anthony Recine
525 Washington Boulevard
Jersey City, NJ 07310

The **Ethics Hotline and Suspected Violation Reporting Form** may be mailed directly to AEH's Chief Compliance Officer at:

Nicholas Huth
1290 Avenue of the Americas
New York, New York 10104

In the case of Accounting Misconduct, an AEH Person may elect to report directly to the Chair of the Audit Committee of the AEH Board of Directors (the "Chair") by email at daniel.kaye@axa-

equitable.com.

If the Accounting Misconduct being reported involves the Chair of the Audit Committee, the AEH Person may elect to report directly to the Chair of the Nominating and Corporate Governance Committee of the AEH Board of Directors by email at george.stansfield@axa.com.

Investigation Procedures

Calls received from the Fraud Hotline are automatically routed and answered in the Financial Security Office ("Fraud Hub"). Calls received from the Ethics Hotline are automatically routed to the Law Department, and, depending on the nature of the complaint, are forwarded to the appropriate department (i.e., Compliance, Human Resources, Internal Audit, or the Fraud Hub).

The Investigations Team of the Internal Audit Department, when allegations implicate employees, or the Fraud Hub, when allegations implicate non-employees, will investigate all suspected fraudulent activity. All allegations of fraud will be investigated and pursued to their appropriate conclusion, including termination of employment, criminal and other legal action where warranted. All allegations are logged and tracked in a database, accessible only by certain Internal Audit and/or Fraud Hub personnel, as appropriate.

The decision to investigate any Allegation or report of Misconduct is not held by the individual responsible for triage of the reports, and this decision need not be communicated to the reporting AEH Person. The subject of an Allegation or report of Misconduct need not be informed of the report against him or her. If an AEH Person makes a report on a named basis, his or her identity will be kept confidential to the extent possible at every stage of the review and processing of the report/complaint.

Any Allegation or report of Misconduct that meets the definition of "Whistle-Blowing" under applicable law will be highlighted as such in triage and treated as "Whistle-Blowing" in accordance with applicable law.

All AEH Persons have a duty to promptly cooperate, and provide accurate information in connection with, any investigation or Misconduct or Allegations or of discrimination, retaliation or harassment resulting from the report or investigation of such matters.

Special Procedures for Accounting Misconduct

The General Counsel shall immediately receive notification of any report related to Accounting Misconduct and shall immediately notify the Chair of such report.

The General Counsel, in conjunction with Internal Audit personnel, to the extent the General Counsel deems necessary or appropriate, will undertake a preliminary investigation on behalf of the Audit Committee to determine if the report can be substantiated. Upon receiving the results of the preliminary investigation, the Chair will determine if any further action is required to follow up on the complaint.

The Chair has the power to take any appropriate action including, among other things to: (1) refer the matter to the full Audit Committee (2) refer the matter to the full Board of Directors; (3) further investigate the matter; (4) direct that a further internal investigation be conducted; or (5) retain outside counsel, accountants or other third-party advisors to investigate.

Revised 5/6/2018