

**AXA EQUITABLE HOLDINGS, INC.
BOARD OF DIRECTORS COMMUNICATION POLICY**

Effective May 9, 2018

1. Policy Statement

AXA Equitable Holdings, Inc. (the "Company") values the input and insights of its stockholders and other interested parties and believes that effective communication strengthens the role of the Company's Board of Directors (the "Board") as an active, informed and engaged body. To facilitate communication, this policy outlines the procedures for communicating with the Board, the committees of the Board ("Committees") and the members of the Board or any Committee.

The Nominating and Corporate Governance Committee of the Board (the "Nominating Committee") will oversee this Policy and will periodically review it and recommend any changes to the Board. The Board can modify this policy unilaterally at any time without notice.

2. Communications to the Board

Stockholders and other interested parties can communicate with the Board as a whole, the independent directors, or any individual member of the Board or any Committee. All such communications should be submitted by mail at the following address:

AXA Equitable Holdings, Inc.
c/o Secretary
1290 Avenue of the Americas
New York, New York 10104

3. Procedures for Handling Communications to the Board

The Board has designated the Company's Secretary as its agent to receive and review written communications addressed to the Board, any of its Committees, or any Board member or group of members. The Secretary may communicate with the sender for any clarification. In addition, the Secretary will promptly forward to the chairperson of the Audit Committee of the Board (the "Audit Committee") and the General Counsel of the Company any communication alleging legal, ethical or compliance issues by management or any other matter deemed by the Secretary to be potentially material to the Company.

As an initial matter, the Secretary will determine whether the communication is a proper communication for the Board. The Secretary will not forward to the Board, any Committee or any director communications of a personal nature or not related to the duties and responsibilities of the Board, including, without limitation, junk mail and mass mailings, business solicitations, routine customer service complaints, new product or service suggestions, opinion survey polls or any other communications deemed by the Secretary to be immaterial to the Company ("Immaterial Communications").

Separately, the Board has established a policy regarding reporting misconduct, a copy of which is available upon request from the Secretary, for the receipt, retention and treatment of complaints received by the Company regarding accounting, internal accounting controls or auditing matters and the confidential, anonymous submission of concerns regarding questionable accounting or auditing matters.

The Secretary will maintain a log and copies of all communications other than Immaterial Communications, which any director may review upon request. The Secretary will review the log periodically, but not less than annually, with the chairperson of the Audit Committee and the General Counsel of the Company.

Revised 5/5/2018