



ALLIANCEBERNSTEIN®

September 2021



AB Global Slavery and Human Trafficking Statement and Report

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Reporting Entity: AllianceBernstein and Its Subsidiaries

AllianceBernstein and our subsidiaries (which we'll collectively refer to as AB, we, our, us and other similar pronouns) are independently operated and majority owned by Equitable Holdings. We provide research, diversified investment management and related services globally to a broad range of clients through our three distribution channels—Institutions, Retail and Private Wealth Management—as well as our sell-side business, Bernstein Research Services.

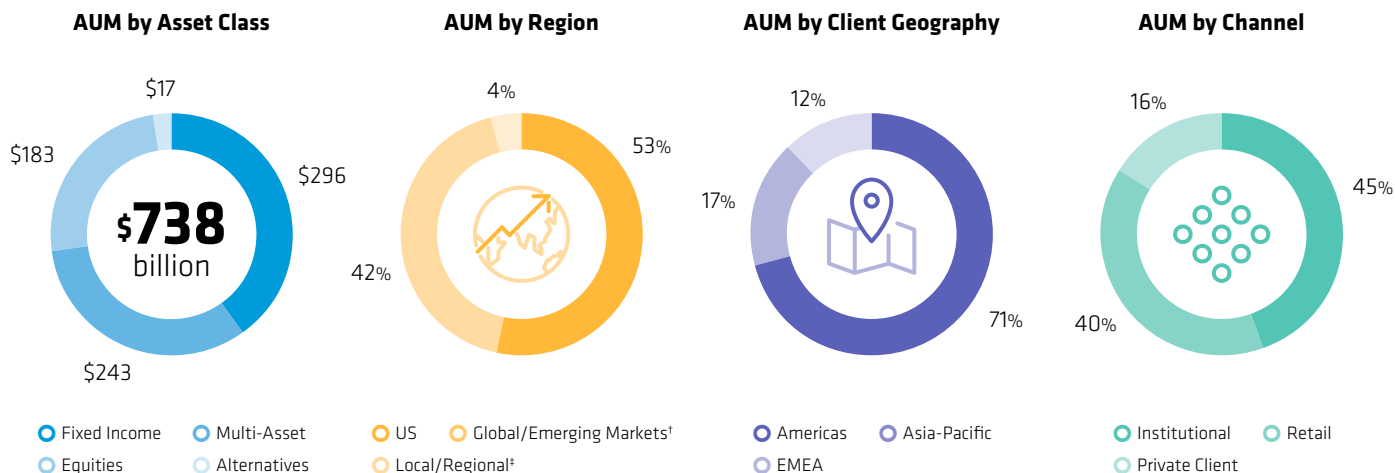
The foundation of our business is high-quality, in-depth research, which we believe drives us to achieve long-term, sustainable investment success on behalf of our clients. Our global research network spans many disciplines, including economic, fundamental equity and fixed income, and quantitative research. We also have experts focused on multi-asset strategies, wealth management and alternative investments.

As a responsible firm and responsible investor, we're committed to addressing environmental, social and governance (ESG) issues—both as a corporate citizen and in striving to deliver better outcomes for clients. We foster a culture of diversity and inclusion because different backgrounds and perspectives lead to better decisions and insights. We've built our business model on a strong risk-aware culture, prudent risk-taking and a robust governance framework that continues to evolve.

We adhere to and promote a culture of strong professional ethics. We're dedicated to doing business with the highest standards of honesty and fairness. We do this not only to comply with applicable laws and regulations but also to earn and keep the trust of clients, employees, shareholders, business partners and other stakeholders. We also have ongoing regard to best practices, including the OECD Guidelines for Multinational Enterprises and the United Nations (UN) Guiding Principles on Business and Human Rights.

This statement is also made by AllianceBernstein's subsidiaries, including AllianceBernstein Limited (ABL), Bernstein Autonomous LLP (BA) and Sanford C. Bernstein Limited (SCBL) pursuant to Section 54 of the UK Modern Slavery Act 2015 (the MSA), and AllianceBernstein Investment Management Australia Limited ABN 58 007 212 606 (ABIMAL) pursuant to Section 13 of the Modern Slavery Act 2018 of the Commonwealth of Australia (the AMSA). It sets out the steps that AB has taken during the 2020 fiscal year, ending December 31, 2020, to combat and prevent modern slavery and human trafficking in its business and supply chains. This statement covers certain aspects of ABL's and BA's direct operations and certain aspects of our supply chains. This statement also seeks to provide the information that we're required to disclose under Section 16 of AMSA related to ABIMAL related to the year ended December 31, 2020.

AS OF JUNE 30, 2021, AB MANAGES US\$738 BILLION ON BEHALF OF OUR CLIENTS*



*Numbers may not sum due to rounding. † Global and EAFE services, including those that invest in emerging markets, as well as stand-alone global emerging-market services ‡ Single country/regional services outside the US, including single country/regional emerging-market services

Governance

AB leverages a decentralized governance framework to oversee vendor risks (including modern slavery). Our **Board of Directors** formally reviews and approves our annual Global Slavery and Human Trafficking Statement before it's published.

Our **Chief Responsibility Officer** (CRO) oversees firmwide corporate responsibility and responsible investing practices, including integrating modern slavery considerations into AB's business activities. The CRO is responsible for reporting on these activities, which may include identifying and managing modern slavery risk, to AB's Board of Directors, including our Chief Executive Officer (CEO).

Our **Vendor Risk Management Committee**, which is a subset of our **Operational Risk Oversight Committee**, provides firmwide oversight of AB's critical and material vendor relationships, which include information technology vendors and other financial services data companies. The Operational Risk Oversight Committee also ensures that the firm has effective processes to identify, manage, monitor and report material risks. Both committees are part of our firm's Enterprise Risk Management Infrastructure and are either chaired or overseen by our Director of Operational Risk.

Our **investors**—chief investment officers, portfolio managers and fundamental research analysts—are at the heart of our responsible investing practices and help us integrate ESG issues in the investment process. We are currently rolling out an assessment of modern slavery risks across most of our actively managed portfolios that take a risk-based approach.

Our **Proxy Voting and Governance Committee** includes senior representatives from our equity and fixed-income investment

teams, Responsibility team, operations, and legal and compliance departments. Together, they establish our [Proxy Voting and Governance Policy](#), oversee proxy voting activities and formally oversee the proxy voting process. They also ensure that our proxy policies and procedures capture our latest thinking, formulate AB's position on new proposals and consult on votes not anticipated by our policy. The committee considers human rights–related shareholder proposals and incorporates human rights issues into overall vote decisions.

The **Controversial Investments Advisory Council** includes senior representatives from across AB and is co-chaired by our CEO and CRO. The council provides a forum for discussing and debating emerging issues such as modern slavery, related international norms—including, but not limited to, the OECD Guidelines for Multinational Enterprises and UN Global Compact—and private prisons. The council discussion may inform specific investment decisions and helps establish AB policy in these areas.

Our **Ombudsman** is a neutral and independent third party who offers informal, confidential assistance to AB employees, consultants and on-premises vendor staff (including, but not limited to, cleaners and catering staff) as a way to raise and address work-related concerns safely and without fear of retaliation.

Modern slavery is included on our official **incident escalation hotline** for individuals wishing to escalate human rights and/or modern slavery–related concerns. No issues have been raised to this hotline to date, pursuant to the review of any concerns. We also have a **Whistleblowing Policy**.

Our Operations

As responsible investors, we analyze the behavior of our portfolio companies. As a responsible corporation, we seek to mirror the practices we expect to see in others.

When considering our business's exposure to vulnerable populations, high-risk geographies, high-risk products and services, and high-risk business models, we believe our operations are low risk. We adhere to a Code of Business Conduct and Ethics, which underpins everything we do. Each employee is apprised of the Code of Business Conduct and Ethics when employment begins, and must certify the code each year and take Code of Business Conduct and Ethics training.

We are an equal opportunity employer: we do not discriminate against current or potential employees on the basis of age, race, nationality, ethnic origin, gender, sexual orientation, religion, marital status or disability. In 2021, for the sixth consecutive year, AB received a score of 100% on the Human Rights Campaign Foundation's 2021 Corporate Equality Index, the foremost benchmarking survey and report that measures corporate policies and practices related to LGBTQ workplace equality in the US.



Our Supply Chain

We purchase products and services from third-party vendors in order to conduct business operations and deliver on the expectations and requirements of our customers and business partners. Our supply-chain vendors provide goods and services including, but not limited to, information technology, financial services data, and professional services, including catering, travel and hospitality.

We also maintain a formal Vendor Code of Conduct that outlines both our expectations of our vendors generally and our expectation that

vendors comply with applicable laws, rules and regulations, which may include modern slavery or human trafficking laws or regulations.

Vendor Risk Mapping

We perform periodic vendor risk mapping exercises of our critical and material vendors across the various regions in which we operate, assessing vendors on a matrix that compares dollar (or pound) amount spent on vendors and modern slavery risk exposure.

CASE STUDIES

AllianceBernstein

In 2020, we identified our critical and material vendors. Each received our Vendor Code of Conduct and a Due Diligence Questionnaire (DDQ), which included questions about their modern slavery policies and due diligence in their own supply chains.

AllianceBernstein Limited, Bernstein Autonomous LLP and Sanford C. Bernstein Limited

Following our 2019 vendor outreach exercise, we widened the scope in 2020 to include more of our third-party suppliers when we conducted a vendor risk mapping exercise for our UK vendors. More than 600 vendors were categorized into industries such as facilities, food and beverage, human capital and recruitment, merchandise and marketing, professional fees and services, technology and information technology, and travel. We reviewed vendors based on factors such as the amount spent (in pounds) and modern slavery risk exposure in vendors' industry, geography, operations and supply chain. Vendors that score medium/high on modern slavery risk exposure and that meet the amount threshold may be asked to answer a dedicated modern slavery DDQ that includes a request for the vendor's modern slavery and human trafficking statement (if applicable).

AllianceBernstein Investment Management Australia Limited

In 2020, we conducted a vendor risk mapping exercise for our Australian vendors. It involved about 100 vendors across categories including facilities, food and beverage, human capital and recruitment, merchandise and marketing, professional fees and services, technology and information technology, and travel. We reviewed vendors based on factors such as Australian dollar amount spent and modern slavery risk exposure in the relevant industry, geography, operations and supply chain. For most vendors, the amount spent was deemed insignificant and did not warrant further action. Vendors that scored medium/high on modern slavery risk exposure and that met the Australian dollar amount threshold were asked to answer a dedicated modern slavery DDQ. Their replies are currently being reviewed.

Our Investment Activities

AB has been recognized for its ongoing work to combat modern slavery and human trafficking in our investment process, receiving the Combating Modern Slavery Award at the 2021 Themis AFC Awards. Themis is a think tank that aims to help clients and members identify and manage their specific financial crime risks through a combination of insight, intelligence and innovation.



AB's mission is to deliver better investment outcomes to our clients through differentiated research insights and innovative portfolio solutions designed to address clients' specific challenges. ESG issues are key elements in forming insights and presenting potential risks and opportunities that can affect the performance of companies and issuers we invest in, as well as the portfolios we build. Our [Global Stewardship Statement](#) outlines our policy on responsible investing, ESG integration and collaboration. We integrate ESG—including human rights factors—across most of our actively managed investment strategies (*Display*).

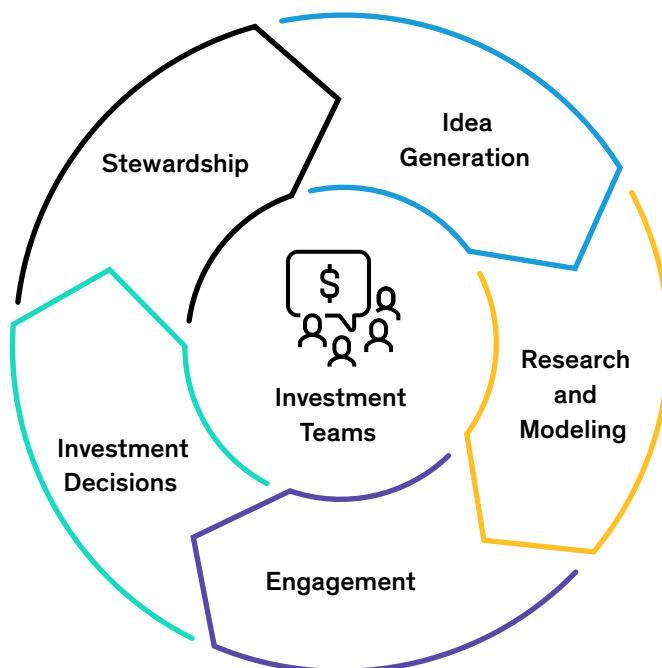
Research and Modeling: Assessing Modern Slavery and Human Trafficking Exposure

At AB, we've been considering the social risks of our investments for many years, with a focus on modern slavery and forced labor. Through our engagements with corporations, we've come to realize that our role as investors makes us uniquely positioned to put modern slavery on the corporate agenda and hold companies accountable for their practices.

Using our own fundamental research and leveraging third-party information as a guide, we've developed and implemented a modern slavery research methodology

ESG INTEGRATION

AB Integrates ESG at Every Step of the Investment Process



Source: AB

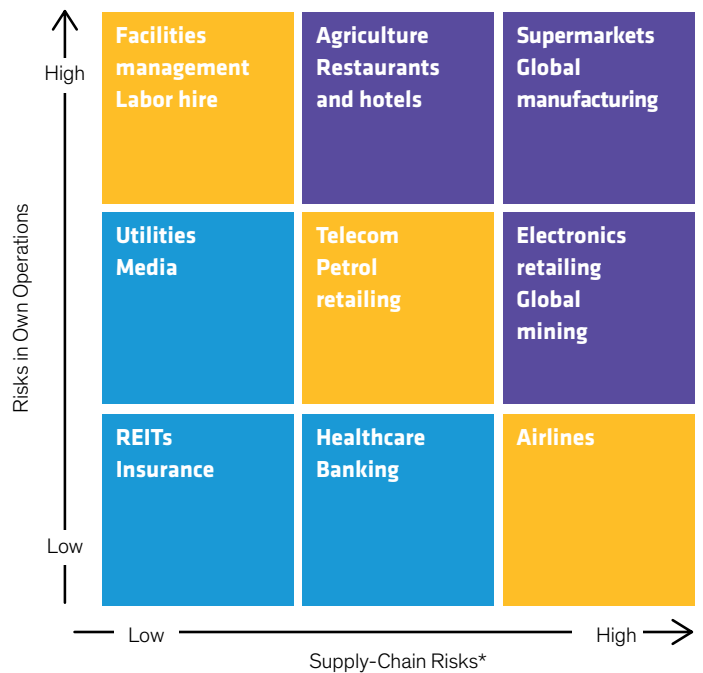
that maps companies based on their potential level of exposure to modern slavery in business operations and supply chains. This matrix measures companies' exposure to high-risk-to-people factors, including vulnerable populations, high-risk geographies, high-risk products and services, and high-risk business models.

The methodology enables our investment teams to categorize holdings into nine categories across two dimensions: 1) modern slavery risk exposure in the company itself (low/medium/high) and 2) modern slavery risk exposure in the company's supply chain (low/medium/high) (*Display*). As of June 30, 2021, we have assigned a risk exposure rating to 380 companies. Mapping companies based on risk helps us determine which companies we need to engage with more deeply or urgently on their efforts to reduce risks to people. The map allows us to apply our fundamental research to understand a company's risk exposure. In this effort, we look at where a company operates, not merely where its headquarters is located: for example, a mining company that only operates in Canada has less risk than a Canadian company that also operates in Africa.

Engagement: An Extension of Our Investment Process

Engagement is a natural extension of our active investment process—we regularly engage issuers and stakeholders directly, giving us the opportunity to share our philosophy and corporate governance principles while providing a forum to drive positive change in issuers. Once we understand a company's modern slavery risk exposure profile, we also strive to understand how the company is managing modern slavery risks. Using our proprietary, comprehensive best practices framework, we evaluate companies in collaboration with many leading corporations, expert organizations such as the Mekong Club and Be Slavery Free, academics, and social auditors. The framework assesses companies' governance framework, risk identification, action plan to mitigate risks, action plan effectiveness and future improvement. The main goal of the framework—particularly the future improvement component—is to recognize best practices and encourage continuous learning and improvement. With the framework, our analysts are able to systematically evaluate companies and have a basis for corporate engagements. Since we first began tracking our modern slavery engagements in early 2020, we've engaged on modern slavery with 28 companies during 38 meetings as of June 30, 2021. One of the most heartening aspects of our engagements so far has been discovering the shared conviction of boards and executives that modern slavery is a social evil and business risk, and that all of us—companies, investors and

FRAMEWORK TO ASSESS HIGH-RISK-TO-PEOPLE STOCKS



* Supply-chain risks can include customers and can extend to second- and even third-tier suppliers when the corporation's behavior contributes to modern slavery risks.

Source: AB

consumers—are obligated to do what we can to confront it and, where possible, eradicate it.

Finally, our analysts document their research and engagement in our proprietary research and engagement tools. Doing so enables our investment teams to maintain a running catalogue of company engagements and outcomes in this area and share engagement insights with other analysts across the firm. Importantly, some of our research and engagement tools can be programmed to send automatic notifications to our analysts with reminders to follow up with companies to assess progress.



2021 Modern Slavery Engagement Campaign

As part of our annual ESG Engagement Campaign, in 2021 we're engaging with a targeted list of companies and issuers on the topic of modern slavery. Our equity and fixed-income analysts are engaging across industries such as mining, protein production, mixed retail, food and staples retailing, computers and electronics, technology, and apparel, and are assessing companies using our proprietary framework. Our investors are also engaging for action, encouraging companies to improve their modern slavery risk mitigation practices.

Engage for Insight: To Learn



Investment Decisions: Investment Exclusions

Firmwide, we exclude investments in private prisons after an extensive assessment. We discussed and debated the business model, investment risks, relation to racial justice and social equity, misalignment of companies' incentives with positive societal outcomes, and whether the companies' policies are at odds with international norms and our own views. We explored the data and analysis, read views from all perspectives, took legal guidance from outside advisors and engaged on these issues with major companies in the private prison industry.

After carefully considering all of this information, we determined that the conduct of private prisons is not compatible with either AB's position on modern slavery or commonly accepted international norms. Furthermore, our engagements with these companies showed that they would not advocate for any changes to their business models at this time. We believe that there is reputational risk and added investment risk for our clients from investing in private prisons; we've chosen not to initiate any new long positions or add to existing long positions in our actively managed strategies (as of November 30, 2020). Any existing long positions are being exited in a timely, responsible manner that minimizes financial impact on clients. We will continue to monitor private prisons' strategy and behavior, and other developments. If we were to see

Engage for Action: To Advance



material, positive change in these companies, we would reevaluate our stance.

We also monitor for UN Global Compact breaches across most of our actively managed investment strategies, but we believe that determining whether an issuer is breaching international norms is subjective. We've found that there are no reliable data and that lists published by third-party providers diverge, often with very little overlap. Also, data are historical in nature; many breaches occurred several years (if not decades) earlier, and it's unclear what an issuer must do to be removed from the list.

Instead of relying on third-party data, we believe that the risk of breaching international norms is best understood and addressed through ongoing, in-depth and proprietary fundamental research. This research enables us to fully analyze a wide range of information and properly assess issuer-specific risk. Where a major third-party service provider has deemed that an issuer violated international norms, our investment teams are required to research and document the nature of the breach, including, if applicable, why our internal research demonstrates that the security remains a reasonable investment. Our Responsibility team, in conjunction with our risk division, has implemented a systematic process to ensure that this research has been completed upon initiating a position and annually thereafter as long as the position is held.

Stewardship

Our [Proxy Voting and Governance Policy](#) is overseen by the Proxy Voting and Governance Committee, which provides formal oversight of the policy and process. The policy is reviewed and updated annually to ensure that we reflect contemporary market practices and incorporate learnings from past proxy seasons. Our proxy voting process may also consider ESG issues such as modern slavery and human rights as well as other factors when a vote may affect the valuation and performance of an issuer's securities.

Idea Generation: Tools and Data

As a fundamental, active manager, research is an essential part of our process. We equip our investors with high-quality tools and data to improve their integration and investment decision-making processes. To support our teams, every portfolio manager and research analyst has access to the resources mentioned below.

We've developed two proprietary tools to bolster our research and engagement process. Our **Modern Slavery Risk Exposure Tool** visually displays our internally assigned risk ratings and rationales,

allowing us to look at individual companies, analysts' company coverage and portfolios. The portfolio view helps portfolio managers understand the risk exposure profile of their strategy at the click of a button. As we continue to increase the number of companies covered by our internal ratings, we expect that the tool will enable us to conduct further analysis. Our second tool looks at **Modern Slavery Risk Management**, combining third-party data from topical expert organizations including, but not limited to, KnowTheChain and the Corporate Human Rights Benchmark.

Third-party international norms compliance data capture companies' severe structural breaches of the UN Global Compact Principles and OECD Guidelines for Multinational Enterprises. These standards focus on human rights, labor standards, the environment and anti-corruption. **Third-party controversy data** provide biweekly summaries of controversies including supply-chain issues and labor rights. **Third-party ESG ratings** systematically analyze issuers' processes and procedures to prevent and address modern slavery.

Each tool and resource is an important input allowing our analysts to research, discuss and engage with issuers.

Training

We believe that training is essential to reducing modern slavery risk: people must be aware of what modern slavery is, how they can identify it and how to escalate it.

Our Operations and Vendor Management

We maintain a Code of Conduct, employee handbook, and anti-bribery and corruption policies. Employees can report any signs of modern slavery and human trafficking through formal escalation channels such as the hotline or via our Whistleblowing Policy, as well as to the Ombudsman.

We're committed to rolling out training to vendor relationship managers to increase their awareness of modern slavery risks in AB's supply chain, aiming to have this completed by the end of 2021. ABL, BA and SCBL have launched staff training in the UK on modern slavery. The training highlights the above-mentioned factors to employees involved in the procurement process, so that employees who regularly engage vendors are conscious of modern slavery considerations.

Investment Teams

AB's Responsibility team conducts extensive training programs, with investment staff receiving ongoing ESG training, including peer-to-peer learning and systematized training on external data, systems and tools. Educational sessions cover a suite of topics including modern slavery.

We've launched modern slavery training in collaboration with expert non-governmental organizations. We ran three training sessions on various topics for our investment teams that totaled more than 350 attendees. In March 2020, for example, the Mekong Club in Hong Kong provided an introductory session to our investment teams in the Asia-Pacific region. In September 2020, we hosted a panel debate with Be Slavery Free and Volkswagen discussing on-the-ground experiences and corporate practices. In March 2021, we hosted a session for our Asia-Pacific and European teams with SupplyESChange, focusing on company engagement and the roles of the social audit process.

Industry Participation

We believe industry collaboration is key to reducing modern slavery: no individual or entity can address this issue alone. AB is a member of several industry initiatives explicitly focused on addressing modern slavery.

October 2019: Our Director of Social Research and Engagement joined the **Financial Services Council (FSC) ESG** working group and the **FSC and Responsible Investment Association Australasia Modern Slavery** working group (Australia).

May 2020: AB signed the **KnowTheChain Investor Statement “Investor Expectations on Addressing Forced Labor in Global Supply Chains.”** As an investor signatory, we have access to benchmark reports that highlight targets for investors. Supplemental investor materials include concrete steps investors can take to engage with companies on the issue of forced labor. We also became a member of the **FAIRR Initiative**.

June 2020: AB joined, as an observer, an engagement by the **Interfaith Center on Corporate Responsibility** and **KnowTheChain**, in collaboration with the Principles for Responsible Investment. The engagement, with apparel and footwear companies benchmarked by KnowTheChain, focused on their practices on addressing forced labor in supply chains as well as the increased supply-chain forced labor and labor risks related to COVID-19.

November 2020: AB signed the investor statement “**Find It, Fix It, Prevent It,**” convened and resourced by the UK-based CCLA. AB joined the **Investors Against Slavery and Trafficking Asia-Pacific** initiative.

March 2021: AB became a co-lead investor of the **Investors Against Slavery and Trafficking Asia-Pacific** initiative collaborative engagement workstream.

FAIRR

Established by the Jeremy Coller Foundation, the FAIRR Initiative is a collaborative investor network that raises awareness of ESG risks and opportunities in the protein supply chain, including labor risks. FAIRR helps investors identify and prioritize these factors through research that investors can integrate into their active stewardship and decision-making processes.

In March 2021, FAIRR launched a three-year collaborative engagement program targeting companies with potential labor risks in meat supply chains. The program begins with a series of investor letters requesting a response to asks. It subsequently involves meetings, analysis, contributions to an annual progress report, and advancing the engagement in the following two years with new asks and follow ups.

AB has signed the investor letters and is participating in engagements with BRF Brasil Foods, JBS, Marfrig and Tyson Foods. We have also signed the letter for WH Group.

Measuring Effectiveness

As responsible investors, we scrutinize the behavior of our suppliers and the companies we analyze. As a responsible corporation, we continually turn the same lens on ourselves. To gauge how effective we are in addressing modern slavery risk, we measure certain key performance indicators in our own operations, our supply chain and our investment activities.

We believe training can help people better understand, identify and address modern slavery risks. In our own operations, we provide

guidance to our employees on modern slavery issues and training to our vendor relationship managers.

Finally, within our investment activities, we believe ESG risks—including modern slavery risks—are best addressed through extensive research and engagement with issuers. Using our own proprietary frameworks, issuer disclosures and third-party data, we research and evaluate the modern slavery risks facing the issuers we invest in. To learn more and to encourage positive progress, we engage with issuers directly.

Future Plans

Our Operations and Supply Chain

Going forward, we will take steps to increase awareness among our employees and vendors of what modern slavery is and how they can raise concerns or address these issues. This will include mapping all critical and material vendors for modern slavery risk.

Investment Activities

Leveraging our proprietary frameworks, our investment analysts will continue to assign risk exposure ratings to the issuers they cover.

We plan to continue working with leading industry organizations to improve on these frameworks, recognizing that modern slavery is best understood and assessed from multiple viewpoints.

Our analysts will also continue engaging with issuers on modern slavery risks—both for insight and action. In fact, as part of our annual ESG Engagement Campaign, in 2021 we're engaging with approximately 30 issuers on modern slavery risks in their operations and supply chains.

The Board of Directors stated below approved this statement either on or by September 27, 2021, which constitutes AB's Global Slavery and Human Trafficking Statement and Report for the fiscal year ended December 31, 2020.



By Seth Bernstein
For and on behalf of AllianceBernstein L.P.
Director, President and CEO




By John McConnell
For and on behalf of Sanford C. Bernstein Limited
Director



By Joanna Green
For and on behalf of AllianceBernstein Limited
Director



By Alexandra Perricone
For and on behalf of Bernstein Autonomous LLP
Member



By Jen Driscoll
For and on behalf of AllianceBernstein Investment Management
Australia Limited
Responsible member, Director and CEO

Appendix

Alignment with UK Modern Slavery Act 2015

Matter	Section Where Found
Organization structure and supply chains	Reporting Entity; AllianceBernstein and Its Subsidiaries; Governance; Our Operations; Our Supply Chain
Policies in relation to slavery and human trafficking	Governance; Our Operations; Our Supply Chain
Due diligence processes	Our Supply Chain
Risk assessment and management	Governance; Our Operations; Our Supply Chain; Our Investment Activities; Training
Key performance indicators to measure effectiveness of steps being taken	Measuring Effectiveness
Training on modern slavery and trafficking	Training

Alignment with Modern Slavery Act 2018 of the Commonwealth of Australia

Matter	Section Where Found
Identify the reporting entity for the purpose of the Modern Slavery Act 2018 (Cth)	AllianceBernstein Investment Management Australia Limited ABN 58 007 212 606 in its own capacity and as the responsible entity of the AllianceBernstein Managed Volatility Equities Fund ARSN 099 739 447; AllianceBernstein Dynamic Global Fixed Income Fund ARSN 165 810 686; AllianceBernstein Global Equities Fund ARSN 099 296 607; AB Concentrated Australian Equities Fund ARSN 102 668 100; AB Alternative Risk Premia Fund ARSN 632 945 138; and AB Global Research Insights Fund ARSN 604 172 750.
Describe the reporting entity's structure, operations and supply chains	Governance; Our Operations; Our Supply Chain
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Our Operations; Our Supply Chain; Our Investment Activities
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Governance; Our Operations; Our Supply Chain; Our Investment Activities; Training; Industry Participation
Describe how the reporting entity assesses the effectiveness of these actions	Measuring Effectiveness
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	Reporting Entity; AllianceBernstein and Its Subsidiaries
Any other information that the reporting entity, or the entity giving the statement, considers relevant	Future Plans

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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