



ALLIANCEBERNSTEIN®

Notice of change
AllianceBernstein Fund
constitutions - AMIT Regime

29 March 2018

As stated in the 29 September 2017 Product Disclosure Statements (PDS) for the below AllianceBernstein funds (Funds), we intended to amend the constitutions of the Funds to enable them to implement the Attribution Managed Investment Trust (AMIT) regime. The Funds' AMIT amending deeds were signed on 28 March 2018 and were subsequently lodged with ASIC.

[AllianceBernstein Dynamic Global Fixed Income Fund](#) ARSN 165 810 686 APIR ACM0001AU

[AllianceBernstein Global High Income Fund](#) ARSN 165 810 382 APIR ACM0004AU

[AllianceBernstein Managed Volatility Equities Fund](#) ARSN 099 739 447 APIR ACM0006AU

[AllianceBernstein Global Equities Fund](#) ARSN 099 296 607 APIR ACM0009AU

The new AMIT tax system intendeds to reduce complexity, increase certainty and minimise compliance costs for funds and their investors. Qualifying AMITs enjoy other benefits including:

- + deemed fixed trust treatment;
- + codified "unders and overs" rules;
- + upward cost base adjustments where the cash distribution is less than the taxable income attributed to the investor (after adjusting for certain items such as tax credits that are included in assessable income), to mitigate potential double taxation;
- + issue multiple classes of units as though each class is a separate fund; and
- + stream capital gains arising from large redemptions to exiting investors.

Our view was that it was in the best interests of investors to amend the constitutions for the AMIT regime.

Section 7 "How Managed Investment Schemes are Taxed" of the Fund's PDS stated that the Funds will opt into the attribution managed investment trust (AMIT) regime this year and sets out what AMIT means for you, but basically:

- for each year where a Fund qualifies as an AMIT taxable income will attributed to you on a fair and reasonable basis; or if
- a Fund does not qualify as an AMIT in a year you will be presently entitled to taxable income as was case prior to the introduction of this new AMIT regime.

Therefore, the Funds should be taxed as a flow through trust. Whilst, investors should be taxed on their attributed amounts (where the Fund is an AMIT) or their share of the Fund's net taxable income (where the Fund is not an AMIT), AMIT should not fundamentally change the way investors are taxed and nor should the Funds themselves be subject to Australian income tax. Income attributed to you by an AMIT may form part of your taxable income whether, or not the taxable income is paid to you in cash or units.

Details of the tax components of your attributed trust components or income entitlements will be provided in an AMIT member annual statement or the annual tax statement (as appliance) issued for all Funds. Your elections to receive distribution in cash or additional units are unchanged.

Please refer to your relevant Fund PDS for more information on AMIT and how it may affect you.

Please contact us on (02) 9255 1299 or by email aust_clientservice@alliancebernstein.com with your questions.