

Morgan Stanley Corporate Political Contributions Policy Statement

Morgan Stanley's Board of Directors approved this policy statement, which guides our approach to corporate political contributions, together with our other policies and procedures, including our Code of Ethics. By following this policy statement and our other policies and procedures, by adhering to the letter and the spirit of applicable laws and regulations, and by applying sound judgment to participation in political activities, we can demonstrate our commitment to Morgan Stanley's vision and core values.

Purpose. Every day, governments make policy decisions that affect Morgan Stanley and its business operations. We, therefore, recognize our right and responsibility to participate in the political process.

Generally, Morgan Stanley and its affiliates do not make corporate contributions to political parties or candidates for public office or to organizations organized under Section 527 of the Internal Revenue Code, even if permitted by applicable law. In those instances where contributions are made, we do so because it is in the best interest of Morgan Stanley and, pursuant to procedures, review the legality and appropriateness of each contribution. Our Board of Directors also oversees our political contributions.

Corporate Guidelines. At Morgan Stanley, a compliance culture informs our activities. We maintain procedures designed to comply with applicable laws and regulations, including, but not limited to, Municipal Securities Rulemaking Board Rule G-37, that govern corporate contributions to candidates for political office and to political parties. Under U.S. federal law, we may not contribute corporate funds or make in-kind contributions to candidates for federal office or to national party committees, and no employee or agent may approve such contributions on our behalf.

Reporting. We maintain procedures to disclose corporate political contributions beyond what is required by applicable law. Each year we make available a report of our corporate political contributions. Our corporate political contributions in the U.S. are also reported to, and available at, the appropriate government agencies. In addition, all contributions accepted or made by the Morgan Stanley Political Action Committee (MSPAC) are reported, as required, to the Federal Election Commission and are publicly available.

PAC Guidelines. In the U.S., we administer, and pay the administrative expenses of MSPAC, a political action committee registered with the Federal Election Commission. MSPAC's board of directors has broad representation from our employees and is funded through voluntary employee contributions. Corporate funds are not contributed to MSPAC. As stated above, contributions accepted or made by MSPAC are reported, as required, to the Federal Election Commission and are publicly available.

Requests for Morgan Stanley to make a monetary or "in-kind" political contribution (*e.g.*, use of facilities or personnel for a fundraiser, purchase of tickets for receptions or dinners, advertisements in journals or payment for services) are sent to Morgan Stanley's Director of Government Relations, who is responsible for reviewing such requests. The Director of

Government Relations consults with our Compliance Department, legal counsel or others as appropriate before approving such requests.

As amended June 2008