



LORD ABBETT®

FORM ADV

Part 2A Brochure

December 19, 2014

This brochure provides information about the qualifications and business practices of Lord, Abbett & Co. LLC. If you have questions about the contents of this brochure, please contact us at 201-827-2000 or by email at ADVINFO@lordabbett.com. The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority.

Lord, Abbett & Co. LLC is registered as an investment adviser under the Investment Advisers Act of 1940, as amended (the "Advisers Act"). Lord, Abbett & Co. LLC is subject to the Advisers Act rules and regulations adopted by the SEC. Registration as an investment adviser does not imply any particular level of skill or training.

Additional information about Lord, Abbett & Co. LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

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MATERIAL CHANGES

Following is a list of changes that have been made to this brochure since the last annual update dated December 13, 2013. The list only contains those changes that are or may be considered material; in addition, there have been minor wording enhancements and clarifications throughout the brochure.

- Lord Abbett has sponsored and manages a new family of funds that are authorized and regulated by the Central Bank of Ireland pursuant to the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations, 2011. Updates have been made in the sections entitled *Advisory Business*, *Fees and Compensation*, *Types of Clients*, *Other Financial Industry Activities and Affiliations*, and *Client Referrals and Other Compensation* to reflect this new advisory business.
- The *Types of Clients* section has been updated to reflect that the minimum account size for Managed Accounts is now generally \$100,000.
- The *Code of Ethics, Participation or Interest in Client Transactions and Personal Trading* section contains expanded disclosure regarding seed investments Lord Abbett may make with its proprietary funds. In addition, Lord Abbett now may engage in proprietary trading in futures or other derivatives to hedge such seed investments.
- The *Code of Ethics, Participation or Interest in Client Transactions and Personal Trading* section describes certain payments or credits Lord Abbett may receive from third-party vendors contracted to establish enhanced connectivity with broker-dealers through which the firm trades on behalf of client accounts.
- The *Brokerage Practices* section includes additional disclosure relating to the possibility that equity Managed Accounts may be traded with broker-dealers other than the sponsor of the applicable Managed Account program. Also, there is new disclosure in this section regarding the time at which changes to model portfolios will be communicated to the sponsors of such programs.
- The *Brokerage Practices* section now clarifies that client accounts whose brokerage does not generate research services, such as fixed income accounts, may be the beneficiaries of research generated by client accounts that do generate such research. Lord Abbett may also receive research from fixed income broker-dealers that is not contingent upon specific fixed income trades.
- The *Voting Client Securities* section now identifies circumstances in which Lord Abbett will rely upon determinations of the Board of Directors/Trustees of the Lord Abbett family of mutual funds to resolve conflicts of interest with respect to the voting of other clients' securities.



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LORD ABBETT®

Dear Client:

As a firm that is investment-led and investor-focused, we realize the importance of helping investors to understand and navigate their investment options. We have created this document to provide you with detailed information about Lord, Abbett & Co. LLC. The information included summarizes key aspects of our approach to investment management, the types of strategies we offer, our trading practices, and the policies and procedures we have implemented to manage conflicts of interest.

We appreciate the trust and confidence that our clients have placed in Lord Abbett and hope this information helps you to better understand the structure of our firm, the services we provide, and our efforts to serve each of our clients fairly and equitably.

If you have any questions or would like any additional information regarding specific references within this document, please feel free to contact your relationship manager.

Regards,

Daria L. Foster
Managing Partner



ADVISORY BUSINESS

Firm Overview

Lord, Abbett & Co. LLC ("Lord Abbett" or "the firm") is an independent money management firm founded in 1929. Lord Abbett provides discretionary and nondiscretionary investment management services to a broad range of clients, including registered investment companies. Managing money is the singular focus of Lord Abbett. All of Lord Abbett's investment and operations personnel are located in Lord Abbett's office in Jersey City, New Jersey. Lord Abbett is owned solely by current and former senior professionals of the firm (or by their estate or members of their family) and is not publicly traded. No individual or company owns 25% or more of Lord Abbett.

As of September 30, 2014, Lord Abbett's assets under management were approximately \$137.8 billion, of which approximately \$136.4 billion were managed on a discretionary basis and approximately \$1.4 billion were managed on a nondiscretionary basis.

Investment Advisory Services

Lord Abbett manages equity, fixed-income, and balanced portfolios across a wide range of investment strategies. Portfolio management teams employ a rigorous investment approach and seek to provide a prudent balance of risk and return. The firm's investment processes are supported by a strong internal focus on fundamental and quantitative research.

We believe Lord Abbett's in-house research efforts provide our firm with a source of competitive advantage. We have dedicated significant resources to this effort and continually work to improve our fundamental and quantitative research.

Lord Abbett provides investment advisory services to the following types of clients:

- **Institutional Clients**—Lord Abbett provides discretionary investment advice to retirement and benefit plans, corporations, public funds, foundations, endowments, unions, insurance companies, religious and healthcare organizations, pooled investment vehicles, and family trusts.
- **Registered Investment Companies**—Lord Abbett provides investment advisory services to a family of SEC-registered investment companies (the "Lord Abbett Funds") and registered investment companies sponsored by unaffiliated third parties.
- **Foreign Investment Companies**—Lord Abbett provides investment advisory services to a family of funds that are authorized and regulated by the Central Bank of Ireland pursuant to the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations, 2011 (the "Lord Abbett UCITS Funds").
- **Managed Account Services**—Lord Abbett provides investment advisory services, as well as nondiscretionary security recommendations in the form of model portfolios, through its participation in two types of managed account or "wrap fee" programs. These programs are referred to as Managed Accounts and Model Portfolios.

—**Managed Accounts**—In traditional Managed Account programs, a client selects a financial institution "Sponsor," which provides a bundle of services for a single fee. Typically, this bundle of services includes the research of firms such as Lord Abbett in order to be included as a discretionary investment adviser in the Sponsor's program, payment of Lord Abbett's investment advisory fee, ongoing monitoring and evaluation of Lord Abbett's performance, execution of the client's portfolio transactions, and/or custodial services for the client's assets. In some Managed Account programs, so-called "dual contract" programs, the client enters into both an investment management agreement with Lord Abbett and a program agreement with the Sponsor. In a dual contract program, the investment management fee may not be included in the Sponsor's bundled fee and, in those cases, the client pays the investment management fee directly to Lord Abbett.

—**Model Portfolios**—Pursuant to a master investment advisory services agreement, Sponsors in Model Portfolios receive Lord Abbett's model securities portfolio for a particular investment style. Based on the model, the Sponsor or its designated representative, often referred to as an "overlay manager," exercises investment discretion and executes each client's portfolio transactions predicated on the Sponsor's or overlay manager's own investment judgment. Lord Abbett does not provide Model Portfolios based on the individual needs of any program client.

Differences in Investment Management Services

Lord Abbett provides investment management services through Managed Account and Model Portfolio programs, which generally differ from the investment advisory services it furnishes to other clients. Many of the primary differences include the investment types and strategies used. Managed Accounts and Model Portfolios generally tend to limit eligible investments to publicly traded equity and fixed-income securities, while other Lord Abbett client accounts may also invest in private placements and derivatives. In addition, equity Managed Accounts generally do not participate in initial or secondary offerings because of the difficulty in obtaining sufficient allocations to distribute fairly across all client accounts. Finally, Managed Accounts and Model Portfolios typically have fewer holdings than other client portfolios. Lord Abbett typically relies on the program Sponsor or consultant/financial adviser to provide client portfolio reporting. Additional differences may include the following:

- Equity securities transactions in Managed Accounts and Model Portfolios generally are executed through the Sponsor without a separate commission charge or at a fixed commission amount per trade negotiated by the Sponsor. Equity securities transactions for other Lord Abbett investment management clients are subject to separate commission charges that are negotiated by Lord Abbett.
- Lord Abbett normally uses Sponsor- or consultant/financial adviser-gathered information to assess the suitability of its investment style to the individual needs and financial situation of a Managed Account client and will not conduct any client



suitability determinations for clients in Model Portfolio programs. Lord Abbett will rely exclusively on the Sponsor's suitability determination for programs in which a bank acts as a corporate trustee of or is a fiduciary acting under an investment management agreement with its client.

Please refer to the sections entitled *Methods of Analysis, Investment Strategies, and Risk of Loss* and *Investment Discretion* below for discussions of how Lord Abbett tailors its advisory services to the individual needs of its clients.

FEES AND COMPENSATION

Lord Abbett's investment advisory fees typically are based on a percentage of the value of the account. Fees are set based on the investment strategy and the type and level of services provided. Fees for institutional client accounts normally are billed and payable in arrears based on month- or quarter-end assets, subject to adjustments for interim contributions to or withdrawals from an account.

Appendix 1 to this brochure contains Lord Abbett's standard institutional separate account fee schedules and the typical range of fees payable to Lord Abbett for Managed Account programs. Lord Abbett retains discretion to negotiate the fees charged to clients for investment advisory services, subject to applicable law. Investment advisory fees may be negotiated in light of a client's special circumstances, asset levels, service requirements or other factors, each as determined in Lord Abbett sole discretion. Fee schedules may provide additional breakpoints on larger accounts, including investment companies or other pooled investment vehicles. Lord Abbett may charge different advisory fees for different accounts and may agree to aggregate the assets of related accounts to take advantage of breakpoints. Fees for Managed Account programs are paid to Lord Abbett by the program's Sponsor from the single fee a client pays to the Sponsor.

From time to time, Lord Abbett may agree on a performance-based fee structure with a qualified client, which fee structure will be designed to be in compliance with the Advisers Act, and other applicable law.

Lord Abbett's management fees do not include fees charged by a client's custodian or the fees and other expenses deducted from the assets of a fund in which a client account may invest. In addition, client accounts usually incur transaction costs when they buy and sell securities. For more information, please see the *Brokerage Practices* section below.

Lord Abbett provides investment advisory and administrative services to the Lord Abbett Funds. Lord Abbett receives investment advisory and administrative fees for its services typically paid monthly in arrears based on the average daily net assets of each Fund at annual rates described in each Lord Abbett Fund's Prospectus and Statement of Additional Information. Similarly, Lord Abbett receives investment advisory fees for its services to the Lord Abbett UCITS Funds, which fees accrue daily and are calculated and payable monthly in arrears at annual rates as described in each Lord Abbett UCITS Fund's Prospectus and Supplement.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Lord Abbett may charge both performance-based fees and asset-based fees. The management of accounts with performance-based fees may have the potential to cause a conflict of interest by creating an incentive to favor accounts with performance-based fees in order to generate greater revenue for Lord Abbett. A similar conflict may exist from managing client accounts paying a higher asset-based fee than other accounts or accounts containing assets owned by Lord Abbett, its employees, or its owners.

Lord Abbett has adopted securities allocation policies and procedures to address these potential conflicts of interest. These policies and procedures are reasonably designed to monitor and prevent Lord Abbett from inappropriately favoring one type of account over another. Lord Abbett generally will allocate trades on a *pro rata* basis among eligible client accounts managed with the same investment discipline, regardless of the investment advisory fees paid to Lord Abbett. Eligible accounts are those for which there are no legal or investment restrictions that are inconsistent with the proposed trade and for which there is available cash to enter into the transaction.

Certain considerations however may cause Lord Abbett to deviate from a *pro rata* allocation and vary the portfolio composition, timing, and/or relative size of purchases and sales among types of accounts. In all cases, these differences reflect the investment management teams' best efforts to manage portfolios with the same investment discipline in a common style that is designed to be equitable to all clients over time, but also takes account of appropriate considerations at the time of each trade.

Lord Abbett periodically reviews performance dispersion among all similarly managed accounts, including accounts subject to a performance fee, to identify whether a particular account appears to have been favored relative to other similar accounts. Further details on Lord Abbett's securities allocation policies and procedures are provided in the *Brokerage Practices* section.



TYPES OF CLIENTS

Lord Abbett provides advisory services to a variety of institutional clients, the Lord Abbett Funds and other registered investment companies sponsored by third parties, the Lord Abbett UCITS Funds, and various Managed Accounts. For institutional clients, Lord Abbett typically requires a minimum account size that ranges between \$10–100 million based on the particular strategy being used for the account. Lord Abbett reserves the right, in its sole discretion, to waive or change investment minimums in certain circumstances.

Managed Accounts are typically smaller in size. The minimum account size for Managed Accounts is generally \$100,000, depending on the Sponsor's requirements, with the exception of accounts investing in municipal securities, for which the minimum account size is generally \$250,000. The minimum account size for a Managed Account under a dual contract program is generally \$100,000, with accounts investing in municipal securities generally subject to a \$500,000 minimum.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

Methods of Analysis

Lord Abbett provides investment advisory services across a broad range of strategies and asset classes. The method of analysis varies based on each strategy. In general, our approach is as follows:

Equities

Lord Abbett manages a wide range of equity investment products, including growth, core, and value oriented products. Some approaches focus on specific capitalization ranges—micro cap, small cap, mid cap, and large cap. Other approaches look for investment opportunities in more than one capitalization category or across all capitalization levels. Lord Abbett manages both domestic and international equity strategies. Lord Abbett's investment approach at its core is based on a belief in active management and risk controls. This belief is grounded in a foundation of fundamental and quantitative research.

Investments in equity markets are subject to many risks, including the risk of general market fluctuations and company-specific changes in profitability. Also, small and micro cap company securities tend to be more sensitive to changing economic conditions and tend to be more volatile and less liquid than equity securities of larger companies. In addition, investments in foreign companies may be adversely affected by political, economic, and social volatility, lack of transparency or inadequate regulatory and accounting standards, inadequate exchange control regulations, foreign taxes, higher transaction and other costs, and delays in settlement.

Fixed Income

Lord Abbett invests in fixed-income instruments across the spectrum of duration (from money market and short duration to intermediate to long bond) and credit (from investment grade to high yield) in both

the taxable and tax-exempt marketplaces. Some approaches seek investment opportunities across various sectors, including government, mortgage, corporate, municipal, bank loan, and emerging markets currency and debt, while others are limited to one or more of those sectors. Lord Abbett's fixed-income investment teams generally rely on a combination of fundamental and quantitative research capabilities to aid security selection within their portfolios.

Investments in both taxable and tax-exempt fixed-income securities are subject to many risks, including interest-rate, regulatory, liquidity, mortgage prepayment, issuer or credit, and distressed debt/default risks. With respect to interest rates, investors should be aware of the potential for unanticipated rapid changes in interest rates that could adversely affect investment performance. Tax-exempt bonds may be subject to adverse effects due to governmental actions, including actions by local, state, and regional governments, as well as municipal bankruptcies or credit events. Finally, convertible securities are subject to risks affecting both equity and fixed-income securities, including market, credit, and interest-rate risk.

General Risks

In addition to the strategy-specific risks identified above, there are more general risks associated with investing. Investing in securities involves a risk of loss that all clients should be prepared to bear. If a security is denominated in a currency other than the U.S. dollar, there is a risk that the value of that security will be diminished due to fluctuations in the relative value of the foreign currency against the U.S. dollar. Lord Abbett may use derivatives such as swaps, forwards, futures, options on futures and other options, which are subject to additional risks, including that the value of the derivative may not correlate with the value of the underlying security, rate or index, that portfolio volatility may increase due to the leverage associated with the use of derivatives, and that the counterparty to the derivative may be unable to satisfy its obligations.

Research Information

Portfolio management teams generally use both qualitative and quantitative research in the investment process. Generally, each investment team leverages analysts who are organized along industry lines to conduct company research through on-site visits to companies, competitors, suppliers, and customers. Analysts also attend management meetings that occur at our office in New Jersey and relevant industry conferences. Sharing of information between investment teams occurs on a formal and informal basis. Daily investment meetings facilitate communication between the research analysts and among different portfolio management teams.

Investment Guidelines, Client Requests, and Account Management

Lord Abbett seeks to manage accounts with the same strategy in a uniform manner. However, Lord Abbett may agree to accommodate requests to incorporate specific client direction into Lord Abbett's investment approach. For example, Lord Abbett may accept client accounts with broad-based investment restrictions, such as environmental, social, and governance investing guidelines. Lord Abbett's



compliance with a client's environmental, social, or governance investing guidelines will be based on its good-faith efforts.

In this regard, Lord Abbett may employ a third-party service to provide information regarding companies that fall within such designated categories. Lord Abbett generally will utilize the information supplied by the third party's research and will rely upon the accuracy and completeness of such third-party research, unless Lord Abbett has actual knowledge of a mischaracterization of a company by the third party. Lord Abbett may, but is not required to, supplement the third party's research with information from other market data services such as Bloomberg and FactSet, as well as its own internal research, to determine the suitability of holding certain securities.

Lord Abbett may seek to accommodate requests by Managed Account clients or their investment consultants to consider tax-optimization strategies. In doing so, Lord Abbett may invest in exchange traded funds, or ETFs, to maintain a particular investment exposure while it seeks to avoid a tax "wash sale" result. This could result in a taxable event for that client leading to results that may differ from those of other Managed Account clients that are not seeking to optimize their tax profile.

From time to time, Lord Abbett may invest in unaffiliated ETFs, investment companies, and other commingled or pooled vehicles (e.g., CLOs, CDOs) for a variety of investment reasons, including to facilitate the handling of cash flows or trading, or to provide a more efficient means to obtain market exposure. Fees and expenses associated with investing in an investment company or other commingled or pooled vehicle, which may include the imbedded investment management fee, are in addition to the advisory fees paid by the client to Lord Abbett, and may reduce the account's performance.

Investment Strategies

The following table lists Lord Abbett's investment strategies:

Domestic Equity	
Heritage Collection	
Value Equity	Large Cap Core
Large Cap Value	Growth Equity
Mid Cap Value	Mid Cap Growth
Smid Cap Value	Small Cap Growth
Small Cap Value	Micro Cap Growth
Micro Cap Value	
Calibrated Suite	
Large Cap Value	Dividend Growth
Mid Cap Value	Equity Income
International Equity	
International Core EAFE Plus	
International Dividend	
International Small Cap Core	
Balanced	
Domestic Equity & Taxable Fixed Income	
Domestic Equity & Tax-Free Income	
Taxable Fixed Income	
Short Duration Credit	Bank Loans
Short Duration Core	Multi-Sector
Core	High Yield
Core Plus	Convertible Securities
Long Duration	Emerging Markets Currency
Inflation Focused	Emerging Markets Local Bond
Corporate Credit	Emerging Markets Corporate Debt
Government	
Tax Free Income	
Short Duration	AMT Free
Intermediate Duration	High Yield
Long Duration	

Lord Abbett's Managed Account investment advisory services may also include certain fixed-income investment strategies in which Lord Abbett will construct a laddered portfolio of municipal bonds that are designed to be held to maturity. Lord Abbett will purchase new bonds to replace maturing positions, but will generally not sell bonds prior to maturity absent a significant change in circumstances or outlook, such as with respect to an issuer or a particular sector.

DISCIPLINARY INFORMATION

Neither Lord Abbett nor its management personnel have been the subject of legal or regulatory findings, or are the subject of any pending criminal proceedings that are material to a client's or prospective client's evaluation of our advisory business or the integrity of the firm.



OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

In addition to its registration as an investment adviser under the Investment Advisers Act of 1940, Lord Abbett is registered as a commodity pool operator and commodity trading advisor under the Commodity Exchange Act.

Lord Abbett has three affiliated entities:

- Lord Abbett Distributor LLC, a New York limited liability company and a subsidiary of Lord Abbett, is registered as a broker-dealer under the Securities Exchange Act of 1934 and is a member of the Financial Industry Regulatory Authority, Inc. Lord Abbett Distributor is a limited purpose broker-dealer that serves as the principal underwriter for the Lord Abbett Funds, as distributor of the Lord Abbett UCITS Funds, and as placement agent for privately offered, commingled funds sponsored by Lord Abbett.
- Lord, Abbett Asia LLC ("Lord Abbett Asia"), a Delaware limited liability company and a subsidiary of Lord Abbett, provides client liaison services from its branch office located in Japan. Lord Abbett Asia also may refer investment advisory business to Lord Abbett.
- Lord Abbett China Asset Management Company Limited ("Lord Abbett China"), a fund management company organized as a joint venture under the laws of the People's Republic of China, is an investment management company doing business in China. Lord Abbett is a substantial minority investor in Lord Abbett China.

Lord Abbett has entered into an arrangement with Wilshire Associates Incorporated ("Wilshire") under which Wilshire and Lord Abbett have agreed to cooperate in the joint marketing and support of certain model portfolio strategies designed by Wilshire (referred to in this paragraph as the "Wilshire strategies") to invest exclusively in certain of the Lord Abbett Funds. Wilshire generally makes the Wilshire strategies available to independent investment advisers through third party investment platforms. Lord Abbett receives no direct compensation with respect to the marketing of the Wilshire strategies or Wilshire's provision of advisory services. Lord Abbett and Lord Abbett Distributor LLC receive fees in their respective roles from the Lord Abbett Funds. Lord Abbett does not recommend or select other investment advisers for its clients and is not responsible for the selection or oversight of Wilshire.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Lord Abbett has implemented policies and procedures generally relating to portfolio management, trading practices, and employee personal trading that are designed to manage any actual or potential conflicts of interest.

Code of Ethics

Lord Abbett has adopted a Code of Ethics (the "Code") designed to set forth general ethical and fiduciary principles and the standard of conduct that we require of our personnel. The Code sets forth certain restrictions on activities, such as personal trading and receipt of gifts and entertainment, which may give rise to conflicts of interest. All personnel are required to certify quarterly that they have complied with the terms of the Code. Compliance with the Code is a condition of employment for all personnel and a violation of the Code or any related policies may result in disciplinary action, which may include termination of employment. Below is a summary of key provisions of the Code. A copy of the Code may be obtained by calling Lord Abbett's Chief Compliance Officer at 201-827-2000.

Personal Trading

The Code requires that all Lord Abbett personnel must receive prior approval to execute certain personal securities transactions. Personal transactions generally will not be permitted if any client account is then trading in the same securities or if trading on behalf of any client account is under consideration within a specified time frame. The Code's restrictions on personal trading apply to accounts over which Lord Abbett personnel and/or certain immediate family members have investment discretion or accounts in which they may have a beneficial interest. The Chief Compliance Officer or General Counsel may grant an exception to the prior approval requirement for personal securities transactions and certain reporting requirements on a case-by-case basis, if it is determined that the proposed conduct does not involve any opportunity for abuse and does not involve a material conflict with client interests.

Gifts and Entertainment

The Code and Lord Abbett's Gifts and Entertainment Policies and Procedures place strict limits on the receipt and provision of gifts, travel, and entertainment by Lord Abbett personnel. Occasionally, Lord Abbett personnel may participate in entertainment opportunities related to legitimate business purposes, subject to the requirements and limitations set forth in the Code and the Gifts and Entertainment Policies and Procedures.

Investments by Lord Abbett and Our Personnel in Products We Manage

From time to time, Lord Abbett has provided the initial investment assets for newly launched investment funds, which is commonly referred to as "seeding" such funds. In addition, Lord Abbett may occasionally seed proprietary accounts for the purpose of evaluating a new investment strategy that eventually may be available to clients as a new mutual fund or other investment vehicle. Such funds or proprietary accounts also may serve the purpose of establishing a performance record to enable Lord Abbett to offer such an account's investment style to clients. In some instances, Lord Abbett has engaged in proprietary trading in futures or other derivatives to



hedge such seed investments. In addition, Lord Abbett personnel may be investors in the Lord Abbett Funds or maintain separate accounts in strategies that Lord Abbett manages for its clients. Lord Abbett's management of accounts with proprietary interests alongside nonproprietary client accounts may create an incentive to favor the proprietary accounts over the nonproprietary accounts in the allocation of investment opportunities, time, aggregation and timing of investments. Lord Abbett has established allocation policies and procedures that require Lord Abbett investment personnel to make purchase and sale decisions and allocate investment opportunities among client accounts consistent with its fiduciary obligations, including avoiding favoring any accounts over others over time. Please see *Brokerage Practices—Trade Aggregation* and *—Allocation of Trade Executions* below for more information on these policies and procedures.

Other Potential Conflicts of Interest

Lord Abbett recommends transactions to, and makes investment decisions on behalf of, clients based solely on investment considerations, including whether the investments are suitable for the client and are consistent with the client's investment objectives, policies and restrictions. To the extent permitted by law and/or account guidelines, Lord Abbett may cause client accounts to invest in securities issued by companies with which Lord Abbett has material business relationships, including companies that act as a Managed Account Sponsor, that distribute or place orders on behalf of clients for shares of the Lord Abbett Funds, or that are, or are related to, Lord Abbett clients. In addition, Lord Abbett personnel may buy or sell securities that Lord Abbett has recommended to, or purchased or sold on behalf of, clients. Lord Abbett also may recommend to clients the purchase or sale of securities in which it or its personnel have a financial interest, including the Lord Abbett Funds. These transactions are subject to the requirements and limitations set forth in Lord Abbett's Code and related policies, as well as to the requirements of the Investment Advisers Act of 1940, the Investment Company Act of 1940 and/or other applicable laws. It is Lord Abbett's policy that our clients' interests come first. Lord Abbett's ability to place and/or recommend transactions may be restricted by applicable regulatory requirements and/or its internal policies designed to comply with such requirements.

Lord Abbett may contract with third-party vendors to establish enhanced connectivity with broker-dealers through which the firm trades on behalf of client accounts. Lord Abbett may receive payments from, or credits against amounts otherwise owed to, such vendors. These payments or credits, which are based on amounts paid by the broker-dealers to vendors, are *de minimis*. Moreover, in no case are the payments or credits to Lord Abbett dependent on the trading by Lord Abbett of any particular client's assets. Lord Abbett's selection of broker-dealers to execute client trades is based on considerations relating to best execution and is not impacted by these arrangements.

BROKERAGE PRACTICES

Below we describe our core business practices relating to trading and brokerage. In addition, we provide information regarding certain conflicts of interest that may arise in connection with the execution of trades for client accounts and describe the policies and procedures that we have designed and implemented to help us manage these conflicts of interest.

Broker Selection and Best Execution

Generally, the discretionary investment authority granted to Lord Abbett by each client includes discretion over client brokerage. This means that Lord Abbett has discretion to select broker-dealers and negotiate the transaction costs, including commissions or spreads, in the execution of client portfolio transactions. Clients in Managed Account, commission recapture, or directed brokerage programs, however, limit Lord Abbett's discretion with respect to the selection of broker-dealers. (Please see the discussion below regarding Lord Abbett's client brokerage policies in these circumstances.)

When exercising discretion over client brokerage, it is Lord Abbett's policy to seek "best execution," or the most favorable results under the circumstances, when placing orders for securities transactions for client accounts. Lord Abbett's determination of best execution may not necessarily mean that the client is paying the lowest possible commission rate or spread, as there are several additional important factors to consider when evaluating best execution in client brokerage. Among the factors Lord Abbett considers when selecting a broker-dealer are the broker-dealer's execution capabilities (including block positioning), financial stability, ability to maintain confidentiality, delivery capability, and ability to obtain best price, as well as the value and availability of research services or credit arrangements for the purpose of obtaining such research services. Thus, Lord Abbett will not select broker-dealers solely on the basis of "posted" or "standard" commission schedules, nor will it always seek advance competitive bidding for the most favorable commission rate or spread applicable to a particular transaction. Lord Abbett has adopted policies and procedures designed to ensure that the choice of brokerage firm to execute transactions is based on considerations relevant to seeking best execution and not other factors such as a broker's ability to refer clients to Lord Abbett or distribute Lord Abbett Funds. Lord Abbett may use alternative execution venues in lieu of placing transactions with a traditional brokerage firm, or computer-driven order routing techniques (such as "algorithmic trading") to facilitate best execution and to reduce other transaction costs.

In seeking to obtain best execution, Lord Abbett recognizes that some broker-dealers are better at executing some types of orders than others and it may be in the clients' best interests to use a broker-dealer whose commission rates are not the lowest but whose executions and other services Lord Abbett believes may result in lower overall transaction costs or more favorable or more certain results. Lord Abbett also may pay higher commission rates to broker-dealers on particular client transactions if Lord Abbett believes that the client has obtained best execution and the



commission rate paid by the client is reasonable in relation to the overall value of the execution and any other services provided by the broker-dealer. The reasonableness of commissions is based on Lord Abbett's view of the broker's ability to provide professional services, competitive commission rates, research, and other services that will help Lord Abbett in providing investment advisory services to its clients, viewed in terms of either the particular transaction or Lord Abbett's overall responsibility to its clients. In particular, Lord Abbett may pay higher commission rates to those broker-dealers whose execution abilities, brokerage or research services, or other legitimate and appropriate services are deemed helpful by Lord Abbett's investment teams in the overall management of client accounts.

Subject to applicable law, Lord Abbett may effect "cross" transactions between client accounts, including registered investment companies. In these cases, one client account will purchase securities held by another client account. Lord Abbett effects these transactions only (1) when it deems the transaction to be in the best interests of both client accounts and (2) at a price that Lord Abbett has determined by reference to independent market indicators, which Lord Abbett believes to constitute "best execution" for both accounts. Neither Lord Abbett nor any related party receives any compensation in connection with "cross" transactions.

Managed Accounts

Lord Abbett generally places all transactions in equities for Managed Accounts through the Sponsor or a broker-dealer firm designated by the Sponsor. For these types of equity transactions, Lord Abbett does not negotiate brokerage commissions since execution costs are included in the overall fees charged by the Sponsor or are set as a fixed commission amount per trade by the Sponsor. Lord Abbett's practice avoids the incremental brokerage costs that would be incurred if Lord Abbett used for such transactions broker-dealers other than the Sponsor. Since execution costs are included in the client's single fee agreed with the Sponsor and are not individually negotiated, Lord Abbett typically does not monitor or evaluate the commission rates clients pay or the nature and quality of the services (i.e., best execution) they receive from Sponsors and their designated service providers, including broker-dealer firms. Occasionally, when deemed beneficial for clients, Lord Abbett will place equity transactions with and pay brokerage commission costs to broker-dealers other than the Sponsor. For certain Managed Accounts fixed-income strategies, Lord Abbett will consistently execute fixed-income transactions at financial institutions other than the Sponsor. Such transactions ordinarily occur at net prices, which are built into the security's purchase or sale price and are ultimately borne by the client in addition to any charges for execution otherwise included in the Sponsor's overall fee. Each client should evaluate whether particular Managed Accounts or Model Portfolios are suitable for his or her needs, including the fees charged and services provided.

Transactions Involving Non-U.S. Securities and Depositary Receipts

Some client accounts may not be able to hold non-U.S. securities in direct or "ordinary" form because of custodial limitations or other restrictions. In these cases, Lord Abbett generally will buy depositary receipts ("DRs") or may arrange for the purchase of ordinary shares in non-U.S. markets that settle and convert into DRs. For certain Managed Accounts, when Lord Abbett arranges for the conversion of the non-U.S. ordinary shares into DRs or for the withdrawal and subsequent sale of the underlying non-U.S. shares from the DR custodian, Lord Abbett may use a "step-out" bank or broker-dealer unaffiliated with the Sponsor to effect the DR conversion or withdrawal transaction. Fees and costs associated with each of the DR conversion and withdrawal transactions typically are included in the net price of the transaction and borne by the client. As a result, such fees and costs are in addition to any charges for investment commissions and/or execution otherwise included in the Sponsor's overall fee.

Trade Aggregation

When appropriate and feasible, Lord Abbett will seek to combine or "batch" multiple orders (purchase or sale) of the same security that are placed at or about the same time with the trading desk. Portfolio managers may place orders with the trading desk indicating the immediacy with which the trade should be executed. Orders in the same security with differing levels of immediacy may not be aggregated. Moreover, orders placed for execution with price limits may not be aggregated with orders placed to be executed at the prevailing market price. In addition, not all similarly situated accounts will necessarily participate in the same batched order due to issues such as cash flow considerations, investment restrictions, tax concerns, and brokerage restrictions.

At times, Lord Abbett is not able to batch purchases and sales for all accounts or products it is managing, such as when an individually managed account client directs Lord Abbett to use a particular broker for a trade (sometimes referred to herein as "directed accounts") or when a client restricts Lord Abbett from selecting certain brokers to execute trades for such account (sometimes referred to herein as "restricted accounts").

When transactions for all products using a particular investment strategy are communicated to the trading desk at or about the same time, Lord Abbett generally will place trades first for transactions on behalf of the Lord Abbett Funds and nondirected, unrestricted individually managed institutional accounts, second for restricted accounts, third for Managed Accounts by Sponsor or consultant/financial adviser (as described below), and finally for directed accounts. Communication of changes to portfolio holdings information for Model Portfolios is handled separately near the end of the trading day and generally after the completion of transactions for Managed Accounts. In instances in which the same equity security or group of securities is used in more than one investment strategy, Lord Abbett will normally place transactions first on behalf of the investment strategy that it views as the primary strategy. For



example, Lord Abbett will typically place transactions for large capitalization equity accounts before those for balanced strategy accounts that invest in large-capitalization equity securities. However, in particular situations, Lord Abbett may determine in its sole discretion to place transactions for one group of accounts before or after the remaining accounts based on a variety of factors, including size of overall trade, allocation to the primary strategy, the broker-dealer's commitment of capital, liquidity, or other conditions of the market, or confidentiality. Lord Abbett's overall policy is to treat similarly situated groups of accounts equitably over time.

From time to time, a batched order may not be fully filled during a trading day and may be canceled or subsequently filled or combined with orders for other accounts and then filled. Each account that participates in a particular batched order will do so at the average price for all transactions related to that batched order.

Lord Abbett generally allocates securities purchased or sold in a batched transaction among participating client accounts on a *pro rata* basis. In certain strategies, however, a *pro rata* allocation of the securities or proceeds may not be possible or desirable, as described below. Lord Abbett will decide how to allocate the securities or proceeds according to each account's particular circumstances and needs, and in a manner Lord Abbett believes is fair and equitable to clients over time in light of a variety of factors.

Managed Accounts

Lord Abbett generally will not batch equity transactions for Managed Accounts with transactions for the Lord Abbett Funds and unrestricted (as to transaction execution) individually managed institutional accounts, and these clients will not derive the same advantage from batching orders as a single transaction for the purchase and sale of a particular security. However, in certain circumstances, Lord Abbett may batch Managed Accounts and unrestricted individually managed institutional account trades in ordinary shares in non-U.S. markets that settle and convert into DRs. Accounts subject to batching may receive more favorable results than accounts for which execution costs are covered as part of such service. Lord Abbett generally will batch equity transactions for Managed Accounts for execution through the same Sponsor or directed broker-dealer. Lord Abbett consistently places transactions in certain fixed-income securities with or through firms other than the Managed Account Sponsor or directed broker-dealer. Such transactions ordinarily occur at net prices, which are built into the security's purchase or sale price and are ultimately borne by the client.

Where Lord Abbett manages the same product for multiple Sponsors or consultants/financial advisers, Lord Abbett will rotate the order in which it places equity transactions among the relevant accounts. Lord Abbett normally uses a rotation methodology designed to avoid systematically favoring one Sponsor or group over another and to treat similarly situated groups of accounts equitably over time. Lord Abbett may deviate occasionally from this rotation methodology to take advantage of special opportunities in the market. Transactions in certain limited-supply securities typically will not be subject to this rotation methodology because

not all Sponsors or directed broker-dealers will have access to, or an adequate supply of, such limited-supply securities. Lord Abbett may also place a Sponsor's or directed broker-dealer's transactions after those of other Sponsors/directed broker-dealers to avoid delays Lord Abbett deems too long in execution of transactions for such accounts. These accounts would be consistently placed at the end of the rotation schedule among Sponsors, which may disadvantage such accounts, depending on market conditions.

Model Portfolios

Lord Abbett typically releases its Model Portfolio holdings information to a Sponsor daily. When the related Lord Abbett investment team makes core changes to the Model Portfolio, Lord Abbett will generally communicate its changes to the Sponsor at or near the end of the trading day and generally after the completion of the rotation methodology described above. For Sponsors unable to accept Model Portfolio changes at that time, Lord Abbett will communicate its Model Portfolio changes the following trading-day morning. The Sponsor or an overlay manager is responsible for adjusting existing Model Portfolio accounts to conform to the core changes. Model Portfolio clients may experience account performance that is different from the results obtained when Lord Abbett exercises investment discretion due to the timing and implementation of orders by a Sponsor or overlay manager.

Allocation of Trade Executions

Once a batched order is filled, Lord Abbett generally allocates the securities or cash on a *pro rata* basis among the participating client accounts. In the event that there is limited availability or limited liquidity for investments, however, a *pro rata* allocation may not be possible or desirable. For example, limited availability may exist, without limitation, in certain security types or categories such as fixed-income securities (including bank loans and high-yield securities), emerging markets, regulated industries, small and micro cap securities, and initial public offerings or new issues. In these cases, Lord Abbett's investment management teams may make allocations that reflect a number of other factors based on Lord Abbett's good-faith assessment of the investment opportunity relative to the objectives, limitations, and requirements of each client account. These factors, which Lord Abbett applies in a manner that it believes is fair and equitable to clients over time, may include, without limitation, (1) client-specific considerations, including investment objectives, guidelines and restrictions, risk profile, and anticipated liquidity needs; (2) type of account; (3) number of securities relative to size and expected future size of an account; (4) availability of other appropriate investment opportunities; (5) other holdings and/or prior allocation affecting an account; (6) rebalancing needs, such as over- or under-weighting in a particular investment, industry, sector, credit rating, maturity, and coupon or interest rate, of an account; (7) minimum denomination, increments, and round lot considerations; (8) tax considerations; and (9) purchases for newly established accounts for which Lord Abbett is seeking to fully invest as promptly as possible.



Accordingly, Lord Abbett may increase or decrease the amount of securities allocated to one or more accounts if necessary, under certain circumstances. Lord Abbett's allocation decisions among client accounts may be more or less advantageous to any one account or group of accounts. As a result of these allocation issues, the amount, timing, structuring, or terms of an investment by a client account may differ from, and performance may be lower than, investments and performance of other client accounts. Client accounts that either receive a less than *pro rata* or no allocation of an investment opportunity that performs well may experience lower performance overall.

Further, when modeling orders for client accounts that include accounts that may invest across multiple asset classes, investment allocation varies. With respect to "mixed asset class accounts" managed by two or more portfolio manager teams (e.g., balanced strategy), the portfolio manager for a particular asset class will generally determine an account's positioning for *pro rata* allocation purposes based on the portfolio's target allocation to that asset class rather than the size of the account as a whole. However, for mixed asset class accounts managed by a single portfolio manager team (e.g., high yield), such accounts will be positioned for *pro rata* allocation purposes based on the total size of the account regardless of the target allocation to the relevant asset class.

Client Commission Arrangements and Soft Dollars

It is Lord Abbett's policy to seek to obtain best execution on all client transactions over which Lord Abbett exercises discretion. However, under circumstances consistent with applicable law and regulation, Lord Abbett may select broker-dealers that furnish Lord Abbett with proprietary and third-party brokerage and research services in connection with commissions paid on transactions it places for client accounts. The brokerage and research services Lord Abbett receives are within the eligibility requirements of Section 28(e) of the Securities Exchange Act of 1934 and, in particular, provide Lord Abbett with lawful and appropriate assistance in the provision of investment advice to client accounts. Such services include (1) furnishing advice as to the value of securities, the advisability of investing in, purchasing, or selling securities, and the availability of securities or purchasers or sellers of securities; (2) furnishing analyses and reports concerning issuers, industries, securities, economic factors and trends, portfolio strategy, and the performance of accounts; and (3) effecting securities transactions and performing functions incidental to securities transactions (such as clearance, settlement, and custody). Such services may come in the form of research reports via email or print, online data services, oral discussions with researchers and other experts, and meetings with company representatives. Lord Abbett has entered into Client Commission Arrangements with a number of broker-dealers that it selects to execute client transactions from time to time. These Client Commission Arrangements provide for the broker-dealers to pay a portion of the commissions paid by eligible client accounts for securities transactions to providers of certain research services

designated by Lord Abbett, including affiliates of such broker-dealers that may provide Lord Abbett with research services. Lord Abbett may initiate a significant percentage, including up to all, of a client's equity transactions with broker-dealers pursuant to Client Commission Arrangements.

Lord Abbett believes that access to independent investment research is beneficial to its investment decision-making processes and, therefore, to its clients. Receipt of independent investment research allows Lord Abbett to supplement its own internal research and analysis and makes available the views of, and information from, individuals and the research staffs of other firms. The receipt of research services from broker-dealers therefore does not tend to reduce the need for Lord Abbett to maintain its own research personnel. Further, Lord Abbett values the receipt of independent, supplemental viewpoints and analyses. Any investment advisory or other fees paid by clients to Lord Abbett are not reduced as a result of Lord Abbett's receipt of research services from broker-dealers. Also, the expenses of Lord Abbett would be increased substantially if it attempted to generate such additional information through its own staff or if it paid for these products or services itself. To the extent that research services of value are provided by or through such broker-dealers, Lord Abbett will not have to pay for such services itself. In addition, Lord Abbett may select broker-dealers that provide research services in order to ensure the continued receipt of such research services which Lord Abbett believes are useful in its investment decision-making process. Lord Abbett may have an incentive to execute trades through certain of such broker-dealers with which it has negotiated more favorable Client Commission Arrangements, rather than executing through a broker-dealer with an arrangement that is less favorable to Lord Abbett. To the extent that Lord Abbett uses brokerage commissions paid in connection with client portfolio transactions to obtain research services, the brokerage commissions paid by such clients might exceed those that might otherwise be paid for execution only. These circumstances give rise to actual and potential conflicts of interest. In order to manage such conflicts of interest, Lord Abbett has adopted internal procedures designed to ensure that (1) the value, type, and quality of any products or services it receives from broker-dealers are permissible under applicable law and (2) investment transactions are placed based solely on best execution considerations.

Lord Abbett believes that any brokerage and research services received from a broker-dealer are, in the aggregate, of assistance to Lord Abbett in fulfilling its overall responsibilities to its clients. Accordingly, research services received for a particular client's brokerage commissions may be useful to Lord Abbett in the management of that client's account, but may also be useful in Lord Abbett's management of other clients' accounts, including accounts that do not generate eligible Section 28(e) brokerage commissions or generate less than a proportionate share of such eligible commissions to pay for research services; similarly, the research received for the commissions of other client accounts may be useful in Lord Abbett's management of that client account. Thus,



Lord Abbett may use brokerage and research services received from broker-dealers in servicing any or all of its accounts, and not all of such services will necessarily be used by Lord Abbett in connection with its management of every client account. Such products and services may disproportionately benefit certain clients relative to others based on the amount of brokerage commissions paid by the client account. For example, Lord Abbett may use research services obtained through soft-dollar arrangements, including Client Commission Arrangements, in its management of certain directed accounts, Managed Accounts, and accounts of clients who may have restricted Lord Abbett's use of soft dollars regardless of the fact that brokerage commissions paid by such accounts are not used to obtain research services.

All accounts included in a batched transaction executed through a broker-dealer pursuant to a Client Commission Arrangement pay the same commission rate, regardless of whether one or more accounts within the batched order has prohibited Lord Abbett from receiving any credit toward such services from its commissions. Some broker-dealers who have negotiated an arrangement with Lord Abbett for the provision of brokerage and research services may offer a lower commission rate for client accounts not participating in such arrangement. It is Lord Abbett's policy, however, to seek to include nonparticipating accounts in a batched trade, as Lord Abbett believes these nonparticipating accounts would receive overall better execution notwithstanding the fact that the nonparticipating account may be able to pay a lower commission rate if it were not included in the batched trade.

In some cases, Lord Abbett may receive a product or service from a broker-dealer that has both an "equity research" and a "non-equity research" use. When this occurs, Lord Abbett makes a good faith allocation between the equity research and non-equity research uses of the product or service. The percentage of the product or service Lord Abbett uses for equity research purposes may be paid for with client commissions, while Lord Abbett will use its own funds to pay for the percentage of the product or service that it uses for non-equity research purposes. In making this good faith allocation, Lord Abbett faces a potential conflict of interest, but Lord Abbett believes that its allocation procedures are reasonably designed to ensure that it appropriately allocates the anticipated use of such products or services to their equity research and non-equity research uses.

Lord Abbett periodically assesses the contributions of the equity brokerage and research services provided by broker-dealers and creates a ranking of broker-dealers reflecting these assessments, as determined by Lord Abbett's investment staff. Portfolio managers and research analysts each evaluate the research services they receive from broker-dealers and make judgments as to the value and quality of such services. These assessments may affect the extent to which Lord Abbett trades with a broker-dealer, although the actual amount of transactions placed with a particular broker-dealer may not directly reflect its ranking in the voting process. Lord Abbett monitors the allocation of equity trading among broker-dealers through periodic reviews. Lord Abbett's arrange-

ments for proprietary and third-party research services do not involve any commitment by Lord Abbett regarding the allocation of brokerage business to or among any particular broker-dealer. Rather, Lord Abbett executes portfolio transactions only when they are dictated by investment decisions to purchase or sell portfolio securities.

From time to time, Lord Abbett prepares a relative categorization and ranking of research providers that it considers to provide valuable research services as determined through evaluations and other feedback provided by Lord Abbett's investment staff. Lord Abbett uses the ranking as a guide for evaluating and determining payments to research providers for research services, including proprietary research services provided to Lord Abbett by executing broker-dealers. Lord Abbett may use commissions generated pursuant to a Client Commission Arrangement to pay a research provider, including an executing broker-dealer who provides proprietary research services to Lord Abbett. Alternatively, Lord Abbett may make cash payments from its own resources to pay research providers for research services. From time to time, Lord Abbett may use commissions generated pursuant to a Client Commission Arrangement to pay for a significant portion of the research services that it receives.

Client Commission Arrangements generally do not apply to fixed-income transactions. The fixed-income securities market is an over-the-counter (OTC) market where commissions are not paid and soft dollars are not used. Dealers generate revenue through the bid-ask spread of the securities they make markets in. Lord Abbett may receive complimentary and customary investment research from various broker-dealers, including broker-dealers through which fixed-income trades are executed in accordance with Lord Abbett's best execution obligations. The receipt of such research, however, is not contingent on specific trades. In addition, fixed-income accounts managed by Lord Abbett may be "cross-subsidized" or benefit from research services received without additional cost by Lord Abbett through Client Commission Arrangements, even though fixed-income accounts do not generate eligible Section 28(e) brokerage commissions or generate less than a proportionate share of such eligible commissions to pay for such research services.

Directed Brokerage and Other Client Restrictions on Brokerage

Clients may direct Lord Abbett to place some or all of the transactions for their accounts with one or more broker-dealers they specify. Clients may do so for several reasons, including offsetting consulting and other fees or participating in a bundled services program, including but not limited to Managed Accounts under a dual contract program. A client that designates use of a particular broker-dealer should understand, however, that such an instruction might prevent Lord Abbett from freely negotiating commission rates or selecting brokers based on the most favorable price and execution for the transaction. Clients also may prohibit Lord Abbett from placing transactions for their accounts with certain broker-



dealers. A client that prohibits Lord Abbett from selecting certain broker-dealers for the placement of transactions for its account should understand that such a prohibition may prevent Lord Abbett from selecting a restricted broker-dealer even though such broker-dealer may offer a more favorable price and execution for the transaction. In addition, the client may lose the possible advantage that non-designating and unrestricted clients may derive from batching orders into single larger transactions, utilizing alternative trading venues, or alternative trading techniques for the purchase or sale of a particular security. Finally, Lord Abbett normally will place transactions for directed accounts, restricted accounts, and Managed Accounts after those placed for non-directed accounts. These factors may cause a client to pay higher commissions or receive less favorable net prices or investment results than would be the case if Lord Abbett were authorized to choose the broker-dealers through which to execute transactions for the client's account.

In order to comply with a client direction, Lord Abbett may engage in "step-out" or "broker-of-credit" transactions. Such situations involve placing a transaction with a broker-dealer with the instruction that the broker-dealer execute the transaction and "step-out," or credit all or a portion of the commission to another broker-dealer that the client has designated. Lord Abbett believes that such arrangements afford the opportunity both to seek best execution with respect to the transaction and to comply with the client's direction.

REVIEW OF ACCOUNTS

Institutional Accounts

Each client account is managed by a Lord Abbett investment team, which is assigned primary responsibility for the day-to-day management and ongoing monitoring of the client account. The investment team's continuous review of a client account includes the review of the appropriateness of portfolio holdings and transactions in light of the client account's investment objective, guidelines, and restrictions and changes in market conditions. The number of accounts managed by each investment team varies depending on the nature and size of the accounts under management and may change over time.

In all cases, accounts are also subject to review by operations and compliance personnel, who monitor account trading on a daily basis with the aid of Lord Abbett's portfolio accounting system and separate equity and fixed-income trading systems that incorporate pretrade or post-trade compliance testing against many account restrictions.

On a quarterly basis, each investment team meets with the Investment Review Committee, which includes Lord Abbett's Managing Partner and Chief Investment Officer. These quarterly meetings ordinarily include review of portfolio holdings, characteristics, strategies, and performance attribution analysis, as well as the team's personnel and other resources.

Managed Accounts

Managed Account investment and operations teams ensure that each such account is subject to reviews similar to those described above. The number of such accounts assigned to each investment or operations team varies depending on the nature and size of the accounts under management, and typically is greater than the number of institutional accounts assigned for review.

Nature and Frequency of Reports

Institutional Accounts: The nature and frequency of reports to institutional account clients vary based on client needs and preferences. Typically, clients receive monthly or quarterly reports that may include portfolio transactions, holdings, characteristics, strategies, performance attribution analysis, and account performance versus portfolio benchmarks. Meetings with institutional clients are held as agreed upon with clients and generally occur annually.

Managed Accounts and Model Portfolio Accounts: Managed Account and Model Portfolio Sponsors typically receive market commentaries prepared by Lord Abbett and may send such commentaries on to Managed Account or Model Portfolio clients. Sponsors also typically issue performance reports to clients on a quarterly basis. Lord Abbett may provide supplemental reporting to these types of clients. In addition, Lord Abbett personnel who are knowledgeable about a Managed Account client's account will be reasonably available to the client for consultation.

CLIENT REFERRALS AND OTHER COMPENSATION

Lord Abbett may make payments out of its past profits and other available sources to certain financial intermediaries for marketing/distribution support, investor/shareholder servicing, entertainment, training and education activities, and/or the purchase of products or services from such intermediaries. Lord Abbett and/or Lord Abbett Distributor LLC also may make payments for these purposes to financial intermediaries in connection with the Lord Abbett Funds and Lord Abbett UCITS Funds. The products or services may include analytical software or data.

With the exception of purchases of products or services from the financial intermediaries, the amounts of Lord Abbett's payments are determined by Lord Abbett or Lord Abbett Distributor LLC, as the case may be, and may be substantial. The intermediaries receiving such payments may include consulting firms and broker-dealers that may recommend that their clients consider or select Lord Abbett to provide them with investment advisory services, as well as to intermediaries that act as dealers for the Lord Abbett Funds or as agents for their clients with respect to purchases of shares of the Funds. In some circumstances, such payments may be deemed to create an incentive for an intermediary or its employees or associated persons to recommend Lord Abbett's advisory services or Funds or to sell shares of a Fund to a client.



Lord Abbett may compensate its affiliates and non-affiliates for solicitation and/or other client-related services provided to Lord Abbett clients and prospective clients. Under the arrangements, generally, Lord Abbett pays a portion of its advisory fee to the solicitor or service provider. Where applicable, any such arrangements comply with Rule 206(4)-3 under the Investment Advisers Act of 1940.

CUSTODY

Lord Abbett does not maintain physical possession of the funds or securities held in clients' accounts. Typically, clients deposit assets with a qualified custodian selected by the client. Generally, under the terms of an investment management agreement between Lord Abbett and each client, Lord Abbett will periodically invoice the client and the client will direct its custodian to pay Lord Abbett. The assets of Managed Account clients are typically deposited with the Sponsor or a qualified custodian selected by the Sponsor or client. Lord Abbett is not involved in the selection or ongoing monitoring of client custodians.

INVESTMENT DISCRETION

Generally, clients retain Lord Abbett on a discretionary basis to provide continuous investment advice pursuant to an investment management agreement that describes the investment services to be provided. Consistent with the client's investment objectives, Lord Abbett typically will have full investment decision-making authority over the type of investments and brokerage for the client's account. From time to time, a client may impose restrictions on certain investments from their account or direct that Lord Abbett use certain broker-dealers to execute transactions for the client's account.

For Managed Accounts investing in equity securities, Lord Abbett's brokerage discretion is generally limited by the applicable Sponsor or client. When investing in fixed-income securities for Managed Accounts, Lord Abbett brokerage selection may be limited by the applicable Sponsor or client, but for certain fixed-income strategies Lord Abbett consistently has the investment decision-making authority to place fixed-income transactions with or through firms other than the Sponsor or directed broker-dealer since such transactions ordinarily occur at net prices. Lord Abbett has neither investment nor brokerage discretion for those clients to whom it provides nondiscretionary investment advice or clients of certain Model Portfolios.

Lord Abbett generally makes investment decisions for each client account for which it has investment and brokerage discretion independently. As a result, due to different investment objectives, policies, or restrictions, if any, Lord Abbett may purchase a particular security for one or more accounts when one or more other accounts are selling the same security. Lord Abbett may also purchase or sell the same securities for a number of client accounts at or about the same time. Lord Abbett's ability to place and/or recommend transactions may be restricted by applicable

regulatory requirements and/or Lord Abbett's internal policies designed to comply with such requirements. For example, Lord Abbett's ownership position on behalf of its client accounts may be restricted by regulation or by a company's corporate charter.

In most cases, a separate investment management team is responsible for portfolio management for all products using a particular investment discipline or style, including institutional accounts, Managed Accounts, mutual funds, and other commingled investment vehicles. Individual members of each such separate investment management team may have primary or exclusive responsibility for managing specific accounts or products invested according to that team's particular investment discipline or style.

As a general matter, each Lord Abbett investment team manages each strategy using a common style in substantially the same manner across all accounts investing in each such strategy. An investment management team (and, in certain circumstances, individual members of that team) may implement its investment decisions in somewhat different ways for each product, however, to the extent that the team members responsible for a particular strategy determine that such differences are appropriate. The differences are typically attributable to the unique considerations relating to each type of product. For example, investment decisions for Managed Accounts may take into account tax considerations that would not be relevant for tax-exempt institutional accounts. As another example, account size, cash flow considerations, and/or redemption requests/withdrawals may cause Lord Abbett to invest differently for Managed Accounts as compared with other types of accounts. These kinds of considerations may cause one product to have a higher cash position than another product at a given time, to reflect implementation of Lord Abbett's investment strategies in different increments or on a different basis with respect to timing of purchases and sales of securities, or to maintain fewer holdings in the interest of avoiding nonstandard principal amounts of fixed-income securities.

In the event that an institutional or Managed Account client terminates Lord Abbett from managing its account, the client or Sponsor will notify Lord Abbett of the termination of Lord Abbett's investment discretion from the account and typically will instruct Lord Abbett as to the client's desire to maintain the securities held in the portfolio or to transition all or a part of the client's portfolio to cash. Unless more time is necessary to complete trading instructed by the client, any orders issued by Lord Abbett before the receipt of a termination notice will generally be executed on the day of receipt and discretion will be maintained until the end of such business day, after which Lord Abbett will not be responsible for any trading or investment decisions.

VOTING CLIENT SECURITIES

Lord Abbett has adopted proxy voting policies and procedures that govern the voting of client securities. Lord Abbett votes proxies in the manner it believes is in the best interests of its clients, including the Lord Abbett Funds and their shareholders. Under the



policies and procedures, Lord Abbett has formed a Proxy Policy Committee to carry out and oversee the proxy voting process. The Proxy Policy Committee consists of Lord Abbett's Chief Investment Officer, Director of Domestic Equity Portfolio Management, Director of International Equity, Director of Research, Chief Administrative Officer for the Investment Department, and General Counsel. Voting decisions are made by the Investment Department in accordance with Lord Abbett's proxy voting policies and procedures and are implemented by employees in the Operations Department. Lord Abbett has retained a third-party service to analyze proxy issues and recommend how to vote on those issues, and to provide assistance in the administration of the proxy process, including maintaining complete proxy voting records.

Conflicts of Interest

Lord Abbett has adopted policies and procedures designed to ensure that conflicts of interests are identified and resolved in its clients' best interests rather than its own. Generally, when Lord Abbett identifies a potential conflict of interest, Lord Abbett adheres to its voting guidelines on the issue or, if the guidelines do not address the particular issue, Lord Abbett would follow the recommendation of the third-party service.

On occasion, a proxy vote may relate to securities of a company with which Lord Abbett has a significant business relationship, such as a company that is an institutional client of Lord Abbett or a company known by Lord Abbett to have a substantial investment in a Lord Abbett Fund. In such circumstances, Lord Abbett will request voting instructions from a committee consisting of members of the Board of Directors/Trustees of the Lord Abbett Funds who are not "interested persons" as defined in the Investment Company Act of 1940. In the absence of explicit instructions from an institutional account client to resolve proxy voting conflicts in a different manner, Lord Abbett will vote all shares on behalf of all clients that hold such a security in accordance with the voting instructions received from the committee of the Lord Abbett Funds' Board.

Summary of Proxy Voting Guidelines

Summarized below are the guidelines that Lord Abbett normally follows in voting proxies. Lord Abbett evaluates each proxy proposal based on the particular facts it believes are relevant to its overall goal of maximizing shareholder value. Lord Abbett reserves the flexibility to vote in a manner contrary to its general views on particular issues if it believes doing so is in the best interests of its clients.

- **Directors.** Lord Abbett believes that a company's independent directors generally are in the best position to identify qualified director nominees and determine a board's leadership structure. Lord Abbett therefore normally votes in accordance with management's recommendations on proposals concerning directors, including proposals that call for separation of the chairman and CEO functions. Lord Abbett may oppose management on a case-by-case basis if it believes that a company's governance structure does not promote independent oversight, among other reasons. Lord Abbett generally votes against proposals to classify a board, that is, to stagger the election of the board's members.
- **Compensation and Benefits.** Lord Abbett believes that management generally is in the best position to assess compensation and benefits. Accordingly, Lord Abbett generally votes with management on compensation and benefit matters, including incentive compensation plans, say-on-pay, clawbacks, anti-gross-up policies, and severance pay. Lord Abbett may oppose management on a case-by-case basis if it deems a company's compensation to be excessive or inconsistent with its peer companies' compensation, it believes a company's compensation measures do not foster a long-term focus among its executive officers and other employees, or it believes a company has not met performance expectations, among other reasons.
- **Anti-Takeover Issues and Shareholder Rights.** Lord Abbett considers proposals concerning anti-takeover issues and shareholder rights on a case-by-case basis based on the particular factors it considers relevant. Some examples of proposals that Lord Abbett tends to support include: (1) proposals to eliminate shareholder rights plans or "poison pills" and proposals to require that companies submit poison pills for shareholder ratification; (2) anti-greenmail provisions and fair price provisions, unless they are bundled with other measures that serve to entrench management or discourage attractive takeover offers; (3) proposals to remove supermajority vote requirements; (4) cumulative voting; and (5) confidential voting.
- **Social, Political, and Environmental Issues.** Lord Abbett evaluates proposals relating to social, political, or environmental issues based on their effect on shareholder value rather than on their ideological merits. Lord Abbett generally follows management's recommendation on such proposals, but pays particular attention to highly controversial issues, as well as instances where management has failed repeatedly to take corrective actions with respect to an issue.



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Client Voting Instructions

A client may instruct Lord Abbett how to vote a particular proxy or how to vote all proxies for securities held in its Lord Abbett account.

Obtaining Further Information

If a Lord Abbett institutional client would like a copy of Lord Abbett's complete proxy voting policies and procedures or information as to how Lord Abbett voted the securities in the client's account, the client should call 201-827-2917. If a client of Lord Abbett's Managed Accounts would like the complete policies and procedures or voting information, that client should contact the Sponsor or the related consultant/financial adviser and request that the Sponsor or consultant/financial adviser call Lord Abbett's Service Center at 888-522-2388.

FINANCIAL INFORMATION

Lord Abbett is not required to provide a balance sheet for its most recent fiscal year, as it does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

Lord Abbett is not aware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments to clients. ■



APPENDIX 1

The following table provides the standard fee schedule for each of Lord Abbett's available institutional strategies:

Strategy	Standard Fee Schedule
Balanced: Domestic Equity and Tax Free Income	.75% on the first \$10 million in assets under management .50% on the next \$15 million in assets under management .35% on the next \$25 million in assets under management .30% on the next \$50 million in assets under management .25% on the next \$100 million in assets under management .20% on assets in excess of \$200 million`
Balanced: Domestic Equity and Taxable Fixed Income	.75% on the first \$10 million in assets under management .50% on the next \$15 million in assets under management .35% on the next \$25 million in assets under management .30% on the next \$50 million in assets under management .25% on the next \$100 million in assets under management .20% on assets in excess of \$200 million
Bank Loans	.50% on the first \$50 million in assets under management .46% on the next \$100 million in assets under management .40% on the next \$100 million in assets under management .38% on the next \$250 million in assets under management .35% on assets in excess of \$500 million
Calibrated Dividend Growth	.60% on the first \$25 million in assets under management .45% on the next \$75 million in assets under management .42% on the next \$150 million in assets under management .39% on the next \$250 million in assets under management Negotiable on assets in excess of \$500 million
Calibrated Equity Income	.55% on the first \$25 million in assets under management .46% on the next \$75 million in assets under management .33% on the next \$400 million in assets under management Negotiable on assets in excess of \$500 million
Calibrated Large Cap Value	.55% on the first \$25 million in assets under management .46% on the next \$75 million in assets under management .33% on the next \$400 million in assets under management Negotiable on assets in excess of \$500 million
Calibrated Mid Cap Value	.74% on the first \$25 million in assets under management .53% on the next \$75 million in assets under management .50% on the next \$150 million in assets under management .47% on the next \$250 million in assets under management Negotiable on assets in excess of \$500 million
Convertible Securities	.51% on the first \$50 million in assets under management .47% on the next \$100 million in assets under management .38% on assets in excess of \$150 million
Core Fixed Income	.28% on the first \$50 million in assets under management .20% on the next \$100 million in assets under management .16% on the next \$350 million in assets under management .14% on assets in excess of \$500 million
Core Plus Fixed Income	.30% on the first \$50 million in assets under management .23% on the next \$100 million in assets under management .20% on the next \$100 million in assets under management .19% on assets in excess of \$250 million
Corporate Credit	.30% on the first \$50 million in assets under management .23% on the next \$100 million in assets under management .20% on the next \$100 million in assets under management .19% on assets in excess of \$250 million



APPENDIX 1 (CONT.)

Strategy	Standard Fee Schedule
Emerging Markets Corporate Debt	.50% on the first \$100 million in assets under management .45% on the next \$150 million in assets under management .43% on the next \$250 million in assets under management .39% on assets in excess of \$500 million
Emerging Markets Currency	.50% on the first \$100 million in assets under management .45% on assets in excess of \$100 million
Emerging Markets Local Bond	.50% on the first \$100 million in assets under management .45% on the next \$150 million in assets under management .43% on the next \$250 million in assets under management .39% on assets in excess of \$500 million
Growth Equity	.60% on the first \$25 million in assets under management .47% on the next \$75 million in assets under management .38% on the next \$400 million in assets under management Negotiable on assets in excess of \$500 million
High Yield Fixed Income	.50% on the first \$50 million in assets under management .40% on the next \$100 million in assets under management .38% on the next \$100 million in assets under management .35% on assets in excess of \$250 million
Inflation Focused	.31% on the first \$100 million in assets under management .24% on the next \$100 million in assets under management .16% on assets in excess of \$200 million
International Core Equity EAFE Plus	.65% on the first \$25 million in assets under management .52% on the next \$75 million in assets under management .42% on the next \$150 million in assets under management .37% on the next \$250 million in assets under management Negotiable on assets in excess of \$500 million
International Dividend Equity	.71% on the first \$25 million in assets under management .51% on the next \$75 million in assets under management .41% on the next \$150 million in assets under management .37% on the next \$250 million in assets under management Negotiable on assets in excess of \$500 million
International Small Cap Core Equity	.85% on the first \$25 million in assets under management .78% on the next \$75 million in assets under management .70% on the next \$400 million in assets under management Negotiable on assets in excess of \$500 million
Large Cap Core Equity	.54% on the first \$25 million in assets under management .42% on the next \$75 million in assets under management .35% on the next \$150 million in assets under management .31% on the next \$250 million in assets under management Negotiable on assets in excess of \$500 million
Large Cap Value Equity	.75% on the first \$10 million in assets under management .50% on the next \$40 million in assets under management .35% on the next \$50 million in assets under management .25% on the next \$100 million in assets under management .20% on assets in excess of \$200 million
Long Duration Fixed Income	.27% on the first \$50 million in assets under management .21% on the next \$100 million in assets under management .16% on the next \$350 million in assets under management .14% on assets in excess of \$500 million
Micro Cap Growth Equity	1.25% on the first \$25 million in assets under management 1.00% on assets in excess of \$25 million
Micro Cap Value Equity	1.25% on the first \$25 million in assets under management 1.00% on assets in excess of \$25 million



APPENDIX 1 (CONT.)

Strategy	Standard Fee Schedule
Mid Cap Growth Equity	.73% on the first \$25 million in assets under management .58% on the next \$75 million in assets under management .52% on the next \$150 million in assets under management .50% on the next \$250 million in assets under management Negotiable on assets in excess of \$500 million
Mid Cap Value Equity	.74% on the first \$25 million in assets under management .53% on the next \$75 million in assets under management .50% on the next \$150 million in assets under management .47% on the next \$250 million in assets under management Negotiable on assets in excess of \$500 million
Multi-Sector Fixed Income	.40% on the first \$50 million in assets under management .31% on the next \$100 million in assets under management .29% on the next \$100 million in assets under management .26% on the next \$250 million in assets under management .25% on assets in excess of \$500 million
Municipal Fixed Income	.21% on the first \$50 million in assets under management .19% on the next \$100 million in assets under management .14% on the next \$100 million in assets under management .13% on assets in excess of \$250 million
Short Duration Core Fixed Income	.20% on the first \$50 million in assets under management .15% on the next \$100 million in assets under management .13% on the next \$350 million in assets under management .11% on assets in excess of \$500 million
Short Duration Credit Fixed Income	.24% on the first \$100 million in assets under management .20% on assets in excess of \$100 million
Small Cap Growth Equity	1.00% on the first \$10 million in assets under management .75% on the next \$40 million in assets under management .625% on the next \$50 million in assets under management .50% on assets in excess of \$100 million
Small Cap Value Equity	1.00% on the first \$10 million in assets under management .75% on the next \$40 million in assets under management .65% on the next \$50 million in assets under management .60% on the next \$100 million in assets under management .55% on assets in excess of \$200 million
Small Cap Value Equity	.85% on the first \$25 million in assets under management .68% on the next \$75 million in assets under management .60% on the next \$150 million in assets under management .57% on the next \$250 million in assets under management Negotiable on assets in excess of \$500 million
Value Equity	.70% on the first \$25 million in assets under management .50% on the next \$75 million in assets under management .48% on the next \$400 million in assets under management Negotiable on assets in excess of \$500 million

The above fee schedules may not apply with respect to client accounts with nonstandard investment guidelines, service requirements, or other terms.



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The following table provides the typical range of fees payable to Lord Abbett for Managed Account programs:

Strategy	Standard Fee Range
Managed Accounts—Equities	0.25–0.50%
Managed Accounts—Fixed Income	0.15–0.35%
Managed Accounts—Laddered Tax-Exempt Fixed Income	0.14–0.15%
Model Portfolios—Equities	0.28–0.40%
Model Portfolios—Fixed Income	0.22%



LORD ABBETT®

Form ADV Brochure Supplement for A. Edward Allinson, CFA

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about A. Edward Allinson that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

A. Edward Allinson is a Portfolio Manager of international equity. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Allinson, born 1961, began his career in the financial services industry in 1985. He joined Lord Abbett in 2005 from RCM Global Advisors, where he was Chief Investment Officer of Global Equities. His prior experience includes Partner and Senior Portfolio Manager at Mellon Growth Advisors, Principal and Senior Portfolio Manager at State Street Global Advisors, and Senior Portfolio Manager at Brown Brothers Harriman and Co. Before that, he worked in the financial services industry, based in Hong Kong. His commentary and interviews have appeared in *The Wall Street Journal* and *Barron's* and on CNN and CNBC. Mr. Allinson received a BA in political science from the University of Pennsylvania and an MBA from the Wharton School of the University of Pennsylvania. He is a holder of the Chartered Financial Analyst® (CFA) designation.

The CFA program, administered by the CFA Institute, is a three-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements tested in three separate exams, and typically requires multiple years and prior qualifying experience to complete.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Not applicable.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

Lord Abbett has extensive policies and procedures, software systems, and other controls that are designed to ensure that client accounts are managed in accordance with client investment guidelines, contractual obligations, and applicable laws and regulations. Each Lord Abbett employee and partner has the responsibility to know and follow the policies and procedures that apply in the performance of his or her duties and is subject to supervision by management. All Lord Abbett investment personnel who are involved in the management of client accounts receive training and certify in writing as to their understanding of the firm's compliance policies and procedures. Lord Abbett's Compliance Department monitors compliance with the firm's compliance policies and procedures and performs periodic review and testing of these policies and procedures. In addition, there are a number of internal committees that oversee and advise Lord Abbett's senior executives on various legal and compliance aspects regarding the management of client accounts.

On a quarterly basis, Mr. Allinson meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Todd D. Jacobson, Partner & Associate Director, supervises Mr. Allinson. If you have a question about the management of your account, you can call your client relationship manager or Mr. Jacobson at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Sean Aurigemma

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Sean Aurigemma that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Sean Aurigemma is a Portfolio Manager for the large cap value, value equity, and large cap core strategies. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Aurigemma, born in 1969, began his career in the financial services industry in 1993. He joined Lord Abbett in 2007 as a Research Analyst for the large cap value strategy. In 2008, he joined the U.S. Large and Mid Cap Equity Research team, and he transitioned into his current role in 2010. Prior to joining Lord Abbett, he was a Managing Director and Portfolio Manager at Morgan Stanley; a Research Analyst at Deutsche Bank Alex. Brown; a Financial Analyst/Corporate Finance at Prudential Securities; and a Financial Analyst/Corporate Finance at Kidder Peabody & Co.

Mr. Aurigemma earned a BA in history from the University of Notre Dame.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. Aurigemma is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. Aurigemma's registered representative status enables him to assist LAD with promotion activities. Mr. Aurigemma spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

In addition to his services to Lord Abbett and its affiliates, Mr. Diamond is a member of the investment committee of Temple Emanu-El in Westfield, New Jersey. The committee is responsible for the oversight of the Temple's investment assets, including development of investment guidelines, asset allocation strategies, and selection of investment

managers or mutual funds. Mr. Diamond receives no compensation in connection with his services to the Temple. Lord Abbett is not aware of any relationship between itself and Temple Emanu-El or any material conflicts of interest with Lord Abbett's clients resulting from such service.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

Lord Abbett has extensive policies and procedures, software systems, and other controls that are designed to ensure that client accounts are managed in accordance with client investment guidelines, contractual obligations, and applicable laws and regulations. Each Lord Abbett employee and partner has the responsibility to know and follow the policies and procedures that apply in the performance of his or her duties and is subject to supervision by management. All Lord Abbett investment personnel who are involved in the management of client accounts receive training and certify in writing as to their understanding of the firm's compliance policies and procedures. Lord Abbett's Compliance Department monitors compliance with the firm's compliance policies and procedures and performs periodic review and testing of these policies and procedures. In addition, there are a number of internal committees that oversee and advise Lord Abbett's senior executives on various legal and compliance aspects regarding the management of client accounts.

On a quarterly basis, Mr. Aurigemma meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Robert I. Gerber, Lord Abbett's Chief Investment Officer, supervises Mr. Aurigemma. If you have a question about the management of your account, you can call your client relationship manager or Mr. Gerber at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Jeff Diamond, CFA

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Jeff Diamond that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Jeff Diamond is a Portfolio Manager on the mid cap value strategy. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Diamond, born 1960, began his career in the financial services industry in 1987. He joined Lord Abbett in 2007 as a Senior Research Analyst supporting the mid cap value strategy. In 2008 he was promoted to Portfolio Manager on the strategy. Previously, he was Managing Director at Axia Capital Management; Senior Vice President/Portfolio Manager at Franklin Mutual Advisers; and Vice President/Assistant Portfolio Manager at Prudential Mutual Funds. He earned an MBA in finance from Columbia University and a BS in operations research and industrial engineering from Cornell University. He is a holder of the Chartered Financial Analyst® (CFA) designation.

The CFA program, administered by the CFA Institute, is a three-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements tested in three separate exams, and typically requires multiple years and prior qualifying experience to complete.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. Diamond is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. Diamond's registered representative status enables him to assist LAD with promotion activities. Mr. Diamond spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

In addition to his services to Lord Abbett and its affiliates, Mr. Diamond is a member of the investment committee of Temple Emanu-El in Westfield, New Jersey. The committee is responsible

for the oversight of the Temple's investment assets, including development of investment guidelines, asset allocation strategies, and selection of investment managers or mutual funds. Mr. Diamond receives no compensation in connection with his services to the Temple. Lord Abbett is not aware of any relationship between itself and Temple Emanu-El or any material conflicts of interest with Lord Abbett's clients resulting from such service.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

Lord Abbett has extensive policies and procedures, software systems, and other controls that are designed to ensure that client accounts are managed in accordance with client investment guidelines, contractual obligations, and applicable laws and regulations. Each Lord Abbett employee and partner has the responsibility to know and follow the policies and procedures that apply in the performance of his or her duties and is subject to supervision by management. All Lord Abbett investment personnel who are involved in the management of client accounts receive training and certify in writing as to their understanding of the firm's compliance policies and procedures. Lord Abbett's Compliance Department monitors compliance with the firm's compliance policies and procedures and performs periodic review and testing of these policies and procedures. In addition, there are a number of internal committees that oversee and advise Lord Abbett's senior executives on various legal and compliance aspects regarding the management of client accounts.

On a quarterly basis, Mr. Diamond meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Robert I. Gerber, Lord Abbett's Chief Investment Officer, supervises Mr. Diamond. If you have a question about the management of your account, you can call your client relationship manager or Mr. Gerber at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for John C. Hardy

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about John C. Hardy that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

John C. Hardy is a Research Analyst of the smid cap value strategy.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Hardy, born in 1981, began his career in the financial services industry in 2003. He joined Lord Abbett in 2011 as a research analyst of the smid cap value strategy. Prior to joining Lord Abbett, he was a Vice President, Senior Financial Analyst – Clean Technology at Gleacher & Co.; and Vice President, Senior Financial Analyst – Clean Technology, Associate Research Analyst, and Trading Assistant at American Technology at American Technology Research, Inc. Mr. Hardy earned a BS from Cornell University.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. Hardy is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. Hardy's registered representative status enables him to assist LAD with promotion activities. Mr. Hardy spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

Lord Abbett has extensive policies and procedures, software systems, and other controls that are designed to ensure that client accounts are managed in accordance with client investment guidelines, contractual obligations, and applicable laws and regulations. Each Lord Abbett employee and partner has the responsibility to know and follow the policies and procedures that apply in the performance of his or her duties and is subject to supervision by management. All Lord Abbett investment personnel who are involved in the management of client accounts receive training and certify in writing as to their understanding of the firm's compliance policies and procedures. Lord Abbett's Compliance Department monitors compliance with the firm's compliance policies and procedures and performs periodic review and testing of these policies and procedures. In addition, there are a number of internal committees that oversee and advise Lord Abbett's senior executives on various legal and compliance aspects regarding the management of client accounts.

Justin Maurer, Partner & Portfolio Manager, and Thomas Maher, Partner & Portfolio Manager, supervise Mr. Hardy. If you have a question about the management of your account, you can call your client relationship manager or Mr. Maurer or Mr. Maher at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Philip B. Herman

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Philip B. Herman that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Philip B. Herman is a Portfolio Manager of municipal bonds. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Herman, born in 1977, began his career in the financial services industry in 1999. He joined Lord Abbett in 2007 as a Portfolio Manager for municipal bonds. Prior to joining the firm, he had portfolio manager responsibilities at Lehman Brothers Asset Management/Neuberger Berman, where he comanaged high-net-worth municipal bond accounts and analyzed investment strategies for those products. Mr. Herman also has served as an Institutional Sales Associate and Investment Executive at RBC Dain Rauscher, and as an Analyst and Investment Executive at First Albany Corp. Mr. Herman earned an MBA in finance and investments from Baruch College's Zicklin School of Business, and a BA in economics from Union College.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. Herman is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. Herman's registered representative status enables him to assist LAD with promotion activities. Mr. Herman spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

Lord Abbett has extensive policies and procedures, software systems, and other controls that are designed to ensure that client accounts are managed in accordance with client investment guidelines, contractual obligations, and applicable laws and regulations. Each Lord Abbett employee and partner has the responsibility to know and follow the policies and procedures that apply in the performance of his or her duties and is subject to supervision by management. All Lord Abbett investment personnel who are involved in the management of client accounts receive training and certify in writing as to their understanding of the firm's compliance policies and procedures. Lord Abbett's Compliance Department monitors compliance with the firm's compliance policies and procedures and performs periodic review and testing of these policies and procedures. In addition, there are a number of internal committees that oversee and advise Lord Abbett's senior executives on various legal and compliance aspects regarding the management of client accounts.

Daniel S. Solender, Partner & Director, supervises Mr. Herman. If you have a question about the management of your account, you can call your client relationship manager or Mr. Solender at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Anthony W. Hipple, CFA

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Anthony W. Hipple that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Anthony W. Hipple is a Portfolio Manager on the mid cap growth equity strategy. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Hipple, born 1964, began his career in the financial services industry in 1995. He joined Lord Abbett in 2002 as a Research Analyst supporting the small cap growth strategy, and was appointed Portfolio Manager of the micro cap growth strategy in 2006. In 2014, he joined the mid cap growth team as a Portfolio Manager. Prior to joining Lord Abbett, he was a Senior Analyst at Piper Jaffray Asset Management and a Senior Analyst at Lutheran Brotherhood.

Mr. Hipple earned a BBA from the University of Northern Iowa and an MBA from the University of Iowa. He is a holder of the Chartered Financial Analyst® (CFA) designation.

The CFA program, administered by the CFA Institute, is a three-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements tested in three separate exams, and typically requires multiple years and prior qualifying experience to complete.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Not applicable.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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On a quarterly basis, Mr. Hipple meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Paul Volovich, Partner & Portfolio Manager, supervises Mr. Hipple. If you have a question about the management of your account, you can call your client relationship manager or Mr. Volovich at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Todd D. Jacobson, CFA

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Todd D. Jacobson that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Todd D. Jacobson is a Partner & Associate Director of international equity. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Jacobson, born in 1966, began his career in the financial services industry in 1988. He joined Lord Abbett in 2003 as Research Analyst and, shortly thereafter, assumed management responsibilities for the international small cap strategy. He was named Partner in 2013 and was named Associate Director of International Equities that same year. Prior to joining Lord Abbett, Mr. Jacobson worked for Warburg Pincus Asset Management/Credit Suisse Asset Management from 1997 to 2003, where he was Director and Co-Manager of the International Focus Equity Project and Head of Japanese Equities (Tokyo). From 1993 to 1997, he worked at Brown Brothers Harriman as a Japanese Equity Analyst and Fixed Income Portfolio Manager. He also worked as an Equity Analyst for Value Line from 1989 to 1991.

Mr. Jacobson has been quoted in *Barron's* and *The Wall Street Journal*, interviewed on CNBC, featured in *PlanSponsor* as an expert on international small cap investing, and named a top fund manager by financial advisor trade magazine *On Wall Street*.

Mr. Jacobson received an MBA in finance from The Wharton School at the University of Pennsylvania and a BA in economics from the State University of New York-Binghamton. He is a holder of the Chartered Financial Analyst® (CFA) designation.

The CFA program, administered by the CFA Institute, is a three-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements tested in three separate exams, and typically requires multiple years and prior qualifying experience to complete.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. Jacobson is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. Jacobson's registered representative status enables him to assist LAD with promotion activities. Mr. Jacobson spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

Lord Abbett has extensive policies and procedures, software systems, and other controls that are designed to ensure that client accounts are managed in accordance with client investment guidelines, contractual obligations, and applicable laws and regulations. Each Lord Abbett employee and partner has the responsibility to know and follow the policies and procedures that apply in the performance of his or her duties and is subject to supervision by management. All Lord Abbett investment personnel who are involved in the management of client accounts receive training and certify in writing as to their understanding of the firm's compliance policies and procedures. Lord Abbett's Compliance Department monitors compliance with the firm's compliance policies and procedures and performs periodic review and testing of these policies and procedures. In addition, there are a number of internal committees that oversee and advise Lord Abbett's senior executives on various legal and compliance aspects regarding the management of client accounts.

On a quarterly basis, Mr. Jacobson meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Vincent J. McBride, Partner & Director, supervises Mr. Jacobson. If you have a question about the management of your account, you can call your client relationship manager or Mr. McBride at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Alan Kurtz

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Alan Kurtz that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Alan Kurtz is a Portfolio Manager of convertible securities. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Kurtz, born in 1976, began his career in the financial services industry when he joined Lord Abbett in 2000. At Lord Abbett, he has worked in previous roles as a Mutual Fund Accountant and a Research Analyst/Trader and Associate Portfolio Manager in convertible securities. He holds an MBA from New York University and a BA in management from Hartwick College.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. Kurtz is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. Kurtz's registered representative status enables him to assist LAD with promotion activities. Mr. Kurtz spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

Lord Abbett has extensive policies and procedures, software systems, and other controls that are designed to ensure that client accounts are managed in accordance with client investment guidelines, contractual obligations, and applicable laws and regulations. Each Lord Abbett employee and partner has the responsibility to know and follow the policies and procedures that apply in the performance of his or her duties and is subject to supervision by management. All Lord Abbett investment personnel who are involved in the management of client accounts receive training and certify in writing as to their understanding of the firm's compliance policies and procedures. Lord Abbett's Compliance Department monitors compliance with the firm's compliance policies and procedures and performs periodic review and testing of these policies and procedures. In addition, there are a number of internal committees that oversee and advise Lord Abbett's senior executives on various legal and compliance aspects regarding the management of client accounts.

On a quarterly basis, Mr. Kurtz meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Steven Rocco, Partner & Portfolio Manager, supervises Mr. Kurtz. If you have a question about the management of your account, you can call your client relationship manager or Mr. Rocco at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Jerald M. Lanzotti, CFA

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Jerald M. Lanzotti that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Jerald M. Lanzotti is a Partner & Portfolio Manager of taxable fixed income. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Lanzotti, born 1967, began his career in the financial services industry in 1990. He joined Lord Abbett in 1996, and became a Partner in 2004. Prior to joining the firm, he worked as an Associate for both Global Money Markets and Global Government Bonds at Deutsche Morgan Grenfell. He also worked at State Street Bank & Trust, where he was a Management Accountant for Foreign Exchange. Mr. Lanzotti earned a BA in international affairs from George Washington University, and an MBA from the American Graduate School of International Management, Thunderbird. He also is a holder of a Chartered Financial Analyst® (CFA) designation.

The CFA program, administered by the CFA Institute, is a three-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements tested in three separate exams, and typically requires multiple years and prior qualifying experience to complete.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. Lanzotti is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. Lanzotti's registered representative status enables him to assist LAD with promotion activities. Mr. Lanzotti spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

Lord Abbett has extensive policies and procedures, software systems, and other controls that are designed to ensure that client accounts are managed in accordance with client investment guidelines, contractual obligations, and applicable laws and regulations. Each Lord Abbett employee and partner has the responsibility to know and follow the policies and procedures that apply in the performance of his or her duties and is subject to supervision by management. All Lord Abbett investment personnel who are involved in the management of client accounts receive training and certify in writing as to their understanding of the firm's compliance policies and procedures. Lord Abbett's Compliance Department monitors compliance with the firm's compliance policies and procedures and performs periodic review and testing of these policies and procedures. In addition, there are a number of internal committees that oversee and advise Lord Abbett's senior executives on various legal and compliance aspects regarding the management of client accounts.

On a quarterly basis, Mr. Lanzotti meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Andrew O'Brien, Partner & Portfolio Manager, supervises Mr. Lanzotti. If you have a question about the management of your account, you can call your client relationship manager or Mr. O'Brien at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Jeffrey D. Lapin, J.D.

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Jeffrey D. Lapin that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Jeffrey D. Lapin is a Portfolio Manager of bank loans. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Lapin, born in 1967, began his career in the financial services industry in 1997 and joined Lord Abbett in 2012 as a Portfolio Manager of taxable fixed income. Prior to that, he was Managing Director and Head of European Market Credit Coverage at Post Advisory Group. His previous experience also includes Partner, Co-Portfolio Manager at Tablerock Fund Management, LLC; Analyst at Avenue Capital Management, LLC; and Research Analyst at M.J. Whitman, Inc.

Mr. Lapin earned an AB in government from Georgetown University, an MBA from New York University's Leonard N. Stern School of Business, and a JD from Northwestern University's School of Law.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Not applicable.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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On a quarterly basis, Mr. Lapin meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Steven Rocco, Partner & Portfolio Manager, supervises Mr. Lapin. If you have a question about the management of your account, you can call your client relationship manager or Mr. Rocco at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Hyun Lee, CFA

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Hyun Lee that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Hyun Lee is a Portfolio Manager of taxable fixed income. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Lee, born in 1970, began his career in the financial services industry when he joined Lord Abbett in 2001. Previously at Lord Abbett he worked as an Associate Portfolio Manager of taxable fixed income. Mr. Lee received a BA and MA in economics from the University of Chicago. He is a holder of the Chartered Financial Analyst® (CFA) designation.

The CFA program, administered by the CFA Institute, is a three-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements tested in three separate exams, and typically requires multiple years and prior qualifying experience to complete.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Not applicable.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

Lord Abbett has extensive policies and procedures, software systems, and other controls that are designed to ensure that client accounts are managed in accordance with client investment guidelines, contractual obligations, and applicable laws and regulations. Each Lord Abbett employee and partner has the responsibility to know and follow the policies and procedures that apply in the performance of his or her duties and is subject to supervision by management. All Lord Abbett investment personnel who are involved in the management of client accounts receive training and certify in writing as to their understanding of the firm's compliance policies and procedures. Lord Abbett's Compliance Department monitors compliance with the firm's compliance policies and procedures and performs periodic review and testing of these policies and procedures. In addition, there are a number of internal committees that oversee and advise Lord Abbett's senior executives on various legal and compliance aspects regarding the management of client accounts.

On a quarterly basis, Mr. Lee meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Kewjin Yuoh, Partner & Portfolio Manager, supervises Mr. Lee. If you have a question about the management of your account, you can call your client relationship manager or Mr. Yuoh at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Robert A. Lee

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Robert A. Lee that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Robert A. Lee is a Partner & Director of taxable fixed income. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Lee, born in 1969, began his career in the financial services industry in 1991. He joined Lord Abbett in 1997 as a Fixed Income Portfolio Manager for mortgage and asset-backed securities, and was named a Partner in 2002. Mr. Lee oversaw the teams responsible for the firm's liquid debt capabilities and securitized products, including Treasuries, agencies, and mortgage-related instruments. As a principal architect of investment strategies for these sectors at the firm, Mr. Lee helped design the fundamental and quantitative elements of the investment process. Prior to joining Lord Abbett, Mr. Lee was a fixed-income Portfolio Manager at ARM Capital Advisors. He also worked in fixed income for Kidder Peabody Asset Management and First Boston Corp. Mr. Lee earned a BS in economics from the Wharton School of the University of Pennsylvania.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. Lee is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. Lee's registered representative status enables him to assist LAD with promotion activities. Mr. Lee spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

Lord Abbett has extensive policies and procedures, software systems, and other controls that are designed to ensure that client accounts are managed in accordance with client investment guidelines, contractual obligations, and applicable laws and regulations. Each Lord Abbett employee and partner has the responsibility to know and follow the policies and procedures that apply in the performance of his or her duties and is subject to supervision by management. All Lord Abbett investment personnel who are involved in the management of client accounts receive training and certify in writing as to their understanding of the firm's compliance policies and procedures. Lord Abbett's Compliance Department monitors compliance with the firm's compliance policies and procedures and performs periodic review and testing of these policies and procedures. In addition, there are a number of internal committees that oversee and advise Lord Abbett's senior executives on various legal and compliance aspects regarding the management of client accounts.

On a quarterly basis, Mr. Lee meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Robert I. Gerber, Lord Abbett's Chief Investment Officer, supervises Mr. Lee. If you have a question about the management of your account, you can call your client relationship manager or Mr. Gerber at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Jason B. Loeb, CFA

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Jason B. Loeb that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Jason B. Loeb is a Research Analyst for the small and micro cap value equity strategies. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Loeb, born 1970, began his career in the financial services industry in 1992. He joined Lord Abbett in 1997 as a Liaison for Wrap Accounts between portfolio managers and clients. Prior to joining Lord Abbett, he was a Portfolio Analyst at BlackRock Financial Management and an Account Executive at Hibbard Brown & Company. Mr. Loeb earned a BA in finance from Richard Stockton College of New Jersey. He also is a holder of the Chartered Financial Analyst® (CFA) designation.

The CFA program, administered by the CFA Institute, is a three-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements tested in three separate exams, and typically requires multiple years and prior qualifying experience to complete.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. Loeb is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. Loeb's registered representative status enables him to assist LAD with promotion activities. Mr. Loeb spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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Justin Maurer, Partner & Portfolio Manager, and Thomas Maher, Partner & Portfolio Manager, supervise Mr. Loeb. If you have a question about the management of your account, you can call your client relationship manager or Mr. Maurer or Mr. Maher at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Thomas B. Maher

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Thomas B. Maher that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Thomas B. Maher is a Partner & Portfolio Manager of the smid, small, and micro cap value equity strategies. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Maher, born in 1967, began his career in the financial services industry in 1989. He joined Lord Abbett in 2003, and was named Partner in 2010. Previously, he worked at Invesco as a Senior Equity Analyst. His previous experience includes: Senior Analyst at Centurion Investment Group, L.P.; Vice President-Investment Research at Lynch & Mayer, Inc.; and Associate at Aiyer Investments (Paribas Asset Management). Mr. Maher earned a BS in business administration from Georgetown University and an MBA from New York University-Leonard N. Stern School of Business.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. Maher is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. Maher's registered representative status enables him to assist LAD with promotion activities. Mr. Maher spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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On a quarterly basis, Mr. Maher meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Robert I. Gerber, Lord Abbett's Chief Investment Officer, supervises Mr. Maher. If you have a question about the management of your account, you can call your client relationship manager or Mr. Gerber at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Justin C. Maurer

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Justin C. Maurer that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Justin C. Maurer is a Partner & Portfolio Manager of the small, and micro cap value equity strategies. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Maurer, born in 1969, began his career in the financial services industry in 1991. He joined Lord Abbett in 2001 as a Research Analyst for small cap value equity strategy, and was named Partner in 2009. Previously, he worked at Merrill Lynch, where he served as a Director in the U.S. Fundamental Equity Research department. His experience also includes serving as Vice President of Equity Research at McDonald Investments and Assistant Vice President and Financial Analyst at Key Corporation. Mr. Maurer earned an MBA from Case Western Reserve University and a BA in accounting and finance from Baldwin-Wallace College.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. Maurer is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. Maurer's registered representative status enables him to assist LAD with promotion activities. Mr. Maurer spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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On a quarterly basis, Mr. Maurer meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Robert I. Gerber, Lord Abbett's Chief Investment Officer, supervises Mr. Maurer. If you have a question about the management of your account, you can call your client relationship manager or Mr. Gerber at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Vincent J. McBride

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Vincent J. McBride that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Vincent J. McBride is a Partner & Director of international equity. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. McBride, born in 1964, began his career in the financial services industry in 1987. He joined Lord Abbett in 2003 to help establish the firm's international equity products, and was named a Partner in 2006. Prior to joining Lord Abbett, he worked for Warburg Pincus Asset Management/Credit Suisse Asset Management, most recently as a Managing Director and the head of the International Equity Group. He also served as a lead manager for several products, including the International Focus Fund, the Emerging Markets Equity Fund, and the Global Telecom and Global Technology sector funds. In prior years, he was an International Equity Analyst at Smith Barney and was part of the analytical team for GE Asset Management's International Equity Group. Mr. McBride's perspective on the international investing markets has been featured in a number of publications, including *The Wall Street Journal*. He has been profiled by MarketWatch from Dow Jones, has been a special guest on CNBC and Bloomberg Television, and was a participant on the *Barron's* international investing roundtable. In addition, he is a volunteer for Big Brothers Big Sisters of New York City. Mr. McBride earned a BS in economics from the University of Delaware and an MBA from Rutgers University.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Not applicable.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

Lord Abbett has extensive policies and procedures, software systems, and other controls that are designed to ensure that client accounts are managed in accordance with client investment guidelines, contractual obligations, and applicable laws and regulations. Each Lord Abbett employee and partner has the responsibility to know and follow the policies and procedures that apply in the performance of his or her duties and is subject to supervision by management. All Lord Abbett investment personnel who are involved in the management of client accounts receive training and certify in writing as to their understanding of the firm's compliance policies and procedures. Lord Abbett's Compliance Department monitors compliance with the firm's compliance policies and procedures and performs periodic review and testing of these policies and procedures. In addition, there are a number of internal committees that oversee and advise Lord Abbett's senior executives on various legal and compliance aspects regarding the management of client accounts.

On a quarterly basis, Mr. McBride meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Robert I. Gerber, Lord Abbett's Chief Investment Officer, supervises Mr. McBride. If you have a question about the management of your account, you can call your client relationship manager or Mr. Gerber at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Andrew H. O'Brien, CFA

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Andrew H. O'Brien that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Andrew H. O'Brien is a Partner & Portfolio Manager of taxable fixed income. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. O'Brien, born 1973, began his career in the financial services industry at Lord Abbett in 1998 as an Associate Portfolio Manager for taxable fixed income, and was named Partner in 2008. Mr. O'Brien earned a BA in economics from Princeton University. He is also a holder of the Chartered Financial Analyst® (CFA) designation.

The CFA program, administered by the CFA Institute, is a three-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements tested in three separate exams, and typically requires multiple years and prior qualifying experience to complete.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. O'Brien is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. O'Brien's registered representative status enables him to assist LAD with promotion activities. Mr. O'Brien spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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On a quarterly basis, Mr. O'Brien meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Robert A. Lee, Partner & Director, supervises Mr. O'Brien. If you have a question about the management of your account, you can call your client relationship manager or Mr. Lee at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for F. Thomas O'Halloran, III, J.D., CFA

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Thomas O'Halloran that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Thomas O'Halloran is a Partner & Portfolio Manager of the micro cap, small cap, and growth equity strategies. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. O'Halloran, born 1955, began his career in the financial services industry in 1987. He joined Lord Abbett in 2001 as a Research Analyst, before assuming full-time responsibility for managing the small cap growth strategy in 2003. In 2003, he was named Partner, and in 2006, the micro cap growth strategy was added to his investment responsibilities. Prior to joining Lord Abbett, Mr. O'Halloran was an Executive Director/Senior Research Analyst at Dillon Read & Co. Inc. and its acquirer, UBS. Before beginning his career in the financial services industry, he was a trial lawyer, which included work as a criminal prosecutor for the State of Rhode Island. Several publications, including *The Wall Street Journal*, have interviewed Mr. O'Halloran for his insights on current market trends and his perspective on small cap growth investments. He has also been profiled in *Investor's Business Daily* and *Barron's*. Mr. O'Halloran earned an AB from Bowdoin College, a JD from Boston College, and an MBA from Columbia University. He is a holder of the Chartered Financial Analyst® (CFA) designation.

The CFA program, administered by the CFA Institute, is a three-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements tested in three separate exams, and typically requires multiple years and prior qualifying experience to complete.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. O'Halloran is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes

investment products of Lord Abbett. Mr. O'Halloran's registered representative status enables him to assist LAD with promotion activities. Mr. O'Halloran spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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On a quarterly basis, Mr. O'Halloran meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Robert I. Gerber, Lord Abbett's Chief Investment Officer, supervises Mr. O'Halloran. If you have a question about the management of your account, you can call your client relationship manager or Mr. Gerber at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Noah Petrucci, CFA

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Noah Petrucci that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Noah Petrucci is a Portfolio Manager for the mid cap value strategy. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Petrucci, born in 1970, began his career in the financial services industry in 1993. He joined Lord Abbett in 2012 from Columbia Management, where he was a Vice President and Senior Portfolio Manager. His prior experience also includes Assistant Vice President at Zurich Scudder Investments. Mr. Petrucci earned a BA in economics from the University of Massachusetts at Amherst. He is a holder of the Chartered Financial Analyst® (CFA) designation.

The CFA program, administered by the CFA Institute, is a three-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements tested in three separate exams, and typically requires multiple years and prior qualifying experience to complete.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Not applicable.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

Lord Abbett has extensive policies and procedures, software systems, and other controls that are designed to ensure that client accounts are managed in accordance with client investment guidelines, contractual obligations, and applicable laws and regulations. Each Lord Abbett employee and partner has the responsibility to know and follow the policies and procedures that apply in the performance of his or her duties and is subject to supervision by management. All Lord Abbett investment personnel who are involved in the management of client accounts receive training and certify in writing as to their understanding of the firm's compliance policies and procedures. Lord Abbett's Compliance Department monitors compliance with the firm's compliance policies and procedures and performs periodic review and testing of these policies and procedures. In addition, there are a number of internal committees that oversee and advise Lord Abbett's senior executives on various legal and compliance aspects regarding the management of client accounts.

On a quarterly basis, Mr. Petrucci meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Robert I. Gerber, Lord Abbett's Chief Investment Officer, supervises Mr. Petrucci. If you have a question about the management of your account, you can call your client relationship manager or Mr. Gerber at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Walter Prah, Ph.D.

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Walter Prah that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Walter Prah is a Partner & Director of quantitative research and a Portfolio Manager of Calibrated equity.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Prah, born in 1958, began his career in the financial services industry in 1985. He joined Lord Abbett in 1997 as Director of Quantitative Research—Taxable Fixed Income. He was named a Partner in 2002. Prior to joining Lord Abbett, Mr. Prah worked as a Fixed-Income Research Analyst at Sanford C. Bernstein & Co.

Mr. Prah earned a BS in mathematics and a Ph.D. in finance from the University of Wisconsin.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Not applicable.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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On a quarterly basis, Mr. Prah meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Robert I. Gerber, Lord Abbett's Chief Investment Officer, supervises Mr. Prah. If you have a question about the management of your account, you can call your client relationship manager or Mr. Gerber at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for David B. Ritt, CFA

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about David B. Ritt that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

David B. Ritt is a Portfolio Manager of the emerging markets currency and the emerging markets local bond strategies. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Ritt, born 1976, began his career in the financial services industry in 1998. He joined Lord Abbett in 2006 as an Associate Portfolio Manager. His prior experience includes Assistant Vice President-Research Analyst at ASB Capital Management. Mr. Ritt received a BA in mathematics and economics from the University of Virginia and an MBA from New York University. He is also a holder of the Chartered Financial Analyst® (CFA) designation.

The CFA program, administered by the CFA Institute, is a three-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements tested in three separate exams, and typically requires multiple years and prior qualifying experience to complete.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Not applicable.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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Leah Traub, Partner & Portfolio Manager, supervises Mr. Ritt. If you have a question about the management of your account, you can call your client relationship manager or Ms. Traub at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Steven F. Rocco, CFA

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Steven F. Rocco that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Steven F. Rocco is a Partner & Portfolio Manager of the high-yield and multi-sector strategies. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Rocco, born 1979, began his career in the financial services industry in 2001. He joined Lord Abbett in 2004 as an Associate Portfolio Manager for the firm's investment-grade, taxable fixed-income strategies. Prior to joining Lord Abbett, he was a Consultant at FactSet. Mr. Rocco earned a BA in economics from Cornell University. He also is a holder of the Chartered Financial Analyst® (CFA) designation.

The CFA program, administered by the CFA Institute, is a three-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements tested in three separate exams, and typically requires multiple years and prior qualifying experience to complete.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Not applicable.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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On a quarterly basis, Mr. Rocco meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Robert A. Lee, Partner & Director, supervises Mr. Rocco. If you have a question about the management of your account, you can call your client relationship manager or Mr. Lee at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Rick J. Ruvkun

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Rick J. Ruvkun that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Rick Ruvkun is a Partner & Portfolio Manager of Calibrated equity management. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Ruvkun, born in 1957, joined Lord Abbett in 2006 as a Portfolio Manager for the firm's mid cap growth strategy. He was named Partner in 2008. Prior to his current role, he was Director of Domestic Equity Research. His previous experience also includes: Partner, managing small and mid growth equity investments at J. & W. Seligman; Portfolio Manager at Bessemer Trust; sell-side Equity Research Analyst, focusing on companies in the information technology sector, and an Equity Analyst for the Emerging Growth Fund at Morgan Stanley; and an Associate in the Venture Capital Division at Merrill Lynch. Mr. Ruvkun began his career in the financial services industry in 1983.

Before beginning his career in the financial services industry, he worked as a Cost Engineer for International Business Machines (IBM).

Mr. Ruvkun's insights on large and mid cap growth investments have been featured in *The New York Times* and *The Wall Street Journal*. He has also been interviewed for his perspective on market valuations by Bloomberg and CNBC.

Mr. Ruvkun earned a BS in mechanical engineering from Stanford University and an MS in management from the Massachusetts Institute of Technology, Sloan School of Management.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. Ruvkun is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. Ruvkun's registered representative

status enables him to assist LAD with promotion activities. Mr. Ruvkun spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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On a quarterly basis, Mr. Ruvkun meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Walter Prahl, Partner & Director, supervises Mr. Ruvkun. If you have a question about the management of your account, you can call your client relationship manager or Mr. Prahl at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Gregory M. Shuman, CFA

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Greg Shuman that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Gregory M. Shuman is an Associate Portfolio Manager of municipal bonds. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Shuman, born in 1986, began his career in the financial services industry when he joined Lord Abbett in 2010 as a portfolio analyst. He holds a BA in economics from Harvard University. He is also a holder of the Chartered Financial Analyst® (CFA) designation.

The CFA program, administered by the CFA Institute, is a three-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements tested in three separate exams, and typically requires multiple years and prior qualifying experience to complete.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Not applicable.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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Daniel S. Solender, Partner & Director, supervises Mr. Shuman. If you have a question about the management of your account, you can call your client relationship manager or Mr. Solender at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Daniel S. Solender, CFA

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Daniel S. Solender that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Daniel S. Solender is a Partner & Director of municipal bonds. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Solender, born 1965, began his career in the financial services industry in 1987. He joined Lord Abbett in 2006 as a Portfolio Manager and Director of the firm's Municipal Bond Management, and was named Partner in 2008. Prior to joining Lord Abbett, he was a Vice President and Portfolio Manager at Nuveen Investments; a Principal and Portfolio Manager at Vanguard Group; an Assistant Vice President and Portfolio Manager at Nuveen Advisory Corp.; and a Financial Analyst/Assistant Manager, Research and Product Development at Citibank. Mr. Solender has been featured in a number of financial media outlets, including *The Wall Street Journal*, *Investor's Business Daily*, *Barron's*, *USA Today*, Bloomberg News Service, Reuters News Service, and Dow Jones Newswires, and has appeared on Bloomberg Television, BNN, and *First Business Morning News*. Mr. Solender earned a BA in history from Columbia University and an MBA in finance from the University of Chicago. He also is a holder of the Chartered Financial Analyst® (CFA) designation.

The CFA program, administered by the CFA Institute, is a three-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements tested in three separate exams, and typically requires multiple years and prior qualifying experience to complete.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. Solender is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. Solender's registered

representative status enables him to assist LAD with promotion activities. Mr. Solender spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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On a quarterly basis, Mr. Solender meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Robert I. Gerber, Lord Abbett's Chief Investment Officer, supervises Mr. Solender. If you have a question about the management of your account, you can call your client relationship manager or Mr. Gerber at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Leah G. Traub, Ph.D.

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Leah G. Traub that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Leah G. Traub is a Partner & Portfolio Manager of currency management. She can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Ms. Traub, born in 1979, began her career in the financial services industry in 2001. She joined Lord Abbett in 2007 as a Quantitative Analyst, and was named a Partner in 2012. Prior to joining Lord Abbett, she was a Research Economist at Princeton Economics Group; a Teaching Assistant and Lecturer at Rutgers University Economics Department; a Research Assistant at the National Bureau of Economic Research; and an Assistant Economist in Capital Markets at the Federal Reserve Bank of New York. Ms. Traub is the coauthor of "Price Discovery in the Foreign Currency Futures and Spot Market" (*Journal of Derivatives* 17:2, Winter 2009). She is a volunteer for the NY ASPCA. She also earned an Excellence in Undergraduate Teaching Award from Rutgers University in 2006. Ms. Traub earned a BA in economics from the University of Chicago, and an MA and a Ph.D. in economics from Rutgers University.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Not applicable.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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On a quarterly basis, Ms. Traub meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Robert A. Lee, Partner & Director, supervises Ms. Traub. If you have a question about the management of your account, you can call your client relationship manager or Mr. Lee at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Daniel Vande Velde

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Daniel Vande Velde that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Daniel Vande Velde is a Partner & Portfolio Manager of municipal bonds. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Vande Velde, born in 1967, began his career in the financial services industry in 1990. He joined Lord Abbett in 2007 as a Portfolio Manager and was named Partner in 2012. Prior to joining Lord Abbett, he was a portfolio manager at McDonnell Investment Management and a Municipal Surveillance Analyst at Van Kampen Investments. Mr. Vande Velde received an MBA from DePaul University and a BBA in finance from Loyola University.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. Vande Velde is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. Vande Velde's registered representative status enables him to assist LAD with promotion activities. Mr. Vande Velde spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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On a quarterly basis, Mr. Vande Velde meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Daniel S. Solender, Partner & Director of Municipal Bond Management, supervises Mr. Vande Velde. If you have a question about the management of your account, you can call your client relationship manager or Mr. Solender at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Paul J. Volovich, CFA

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Paul J. Volovich that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Paul J. Volovich is a Partner & Portfolio Manager of mid cap growth equity.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Volovich, born 1973, began his career in the financial services industry in 1995. He joined Lord Abbett in 1997 as a Quantitative Analyst, and was named Partner in 2008. Previously at Lord Abbett, he was a Research Analyst for the firm's large cap value strategy and, subsequently, was a Portfolio Manager for the large cap core strategy. Prior to joining Lord Abbett, he was an Analyst at Rogers-Casey. Mr. Volovich earned a BA in economics from Muhlenberg College and an MBA from Columbia University. He also is a holder of the Chartered Financial Analyst® (CFA) designation.

The CFA program, administered by the CFA Institute, is a three-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements tested in three separate exams, and typically requires multiple years and prior qualifying experience to complete.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. Volovich is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. Volovich's registered representative status enables him to assist LAD with promotion activities. Mr. Volovich spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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On a quarterly basis, Mr. Volovich meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Robert I. Gerber, Lord Abbett's Chief Investment Officer, supervises Mr. Volovich. If you have a question about the management of your account, you can call your client relationship manager or Mr. Gerber at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Arthur K. Weise, CFA

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Arthur K. Weise that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Arthur K. Weise is a Partner & Portfolio Manager of the micro cap, small cap, and growth equity strategies. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Weise, born 1970, began his career in the financial services industry in 1993. He joined Lord Abbett in 2007 as a Research Analyst for the firm's small cap growth equity strategy, and was named Partner in 2012. Prior to joining Lord Abbett, he was a Managing Director, a Portfolio Manager, and a Research Analyst covering the consumer and industrials sectors for Bank of New York Institutional Asset Management; a Vice President and Director of Research at Trainer Wortham & Co.; and an Associate Director of U.S. Equity Research at Dillon Read/UBS Warburg. Mr. Weise is an active member of the New York Society of Security Analysts.

Mr. Weise earned a BA in economics from Columbia University. He is also a holder of the Chartered Financial Analyst® (CFA) designation.

The CFA program, administered by the CFA Institute, is a three-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements tested in three separate exams, and typically requires multiple years and prior qualifying experience to complete.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Not applicable.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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On a quarterly basis, Mr. Weise meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Thomas F. O'Halloran, Partner & Portfolio Manager, supervises Mr. Weise. If you have a question about the management of your account, you can call your client relationship manager or Mr. O'Halloran at 201-827-2000.



LORD ABBETT®

Form ADV Brochure Supplement for Kewjin Yuoh

Lord, Abbett & Co. LLC
90 Hudson Street, Jersey City, NJ 07302
201-827-2000

This brochure supplement, dated December 19, 2014, provides information about Kewjin Yuoh that supplements the Lord, Abbett & Co. LLC brochure, which you should have received. If you did not receive a copy or if you have any questions about the contents of this supplement, please contact us at 201-827-2000.

Kewjin Yuoh is a Partner & Portfolio Manager of taxable fixed income. He can be contacted at the business address and telephone number shown above.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Yuoh, born in 1971, began his career in the financial services industry in 1994. He joined Lord Abbett in 2010 as a Portfolio Manager for the firm's taxable fixed income strategies and was named Partner in 2012. Prior to joining Lord Abbett, he was a Portfolio Manager of Structured Products at Sanford Bernstein; a Portfolio Manager of Agency Mortgage-Backed Securities at Credit Suisse Asset Management; and a Senior VP, Director of Fundamental Research for Liquid and Structured Products at AllianceBernstein. Mr. Yuoh earned a BS in operations research and industrial engineering from Cornell University, College of Engineering.

DISCIPLINARY INFORMATION

Not applicable.

OTHER BUSINESS ACTIVITIES

Mr. Yuoh is a registered representative of Lord Abbett Distributor LLC ("LAD"), a registered broker-dealer affiliated with Lord Abbett. LAD is a limited-purpose broker-dealer that promotes investment products of Lord Abbett. Mr. Yuoh's registered representative status enables him to assist LAD with promotion activities. Mr. Yuoh spends no more than a limited amount of time assisting LAD and does not receive commissions or other sales-based compensation.

ADDITIONAL COMPENSATION

Not applicable.

SUPERVISION

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On a quarterly basis, Mr. Yuoh meets with Lord Abbett's Investment Review Committee to review portfolio holdings, characteristics, strategies, and performance attribution analysis. The Investment Review Committee consists of Lord Abbett's Managing Partner and Chief Investment Officer. Robert A. Lee, Partner & Director, supervises Mr. Yuoh. If you have a question about the management of your account, you can call your client relationship manager or Mr. Lee at 201-827-2000.