

ETHICS. EVERY DAY. EVERYONE. EVERYWHERE.

Code of Ethics and Business Conduct





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MESSAGE FROM CHRIS SWIFT, CHAIRMAN & CEO

Doing the right thing every day is core to The Hartford's character. Character is central to our company's vision to be exceptional. We want to be known not only for our financial performance and our value to customers, but also for who we are.

Our annual employee surveys show that nearly all of our employees enthusiastically believe The Hartford shows a commitment to ethical business decisions and conduct. We can take great pride in the fact that our results far exceed the top 25 percent of global companies and that we work for a company that values ethical behavior and business practices.

Our stakeholders – customers, partners, investors, employees and regulators – know they can count on us to uphold the highest standards of ethics and compliance. The strength of our character is validated through recognition from the Ethisphere Institute, which has repeatedly named The Hartford as one of the World's Most Ethical Companies.

Let's continue to be recognized as a company that goes well beyond making statements about doing business ethically, and translate those words into action. A good place to begin is The Hartford's Code of Ethics and Business Conduct, which reinforces our behaviors and provides guidance when the right course of action may not be immediately clear.

Thank you for continuing to protect and sustain The Hartford's character and reputation for integrity.





OUR VISION AND BEHAVIORS

For more than 200 years, The Hartford has delivered on its promise to help customers prepare for the unforeseen and protect what is valuable to them. Our long-term success has led to our vision: to be an exceptional company celebrated for financial performance, character and customer value.

Achieving a high-performance culture means living The Hartford behaviors every day. Goals are important, but so is the way we reach them. Character and customer value are just as vital to our reputation as financial performance – leading to behaviors that put the customer at the center of everything we do.

Ethics is foundational to all of our Hartford behaviors.







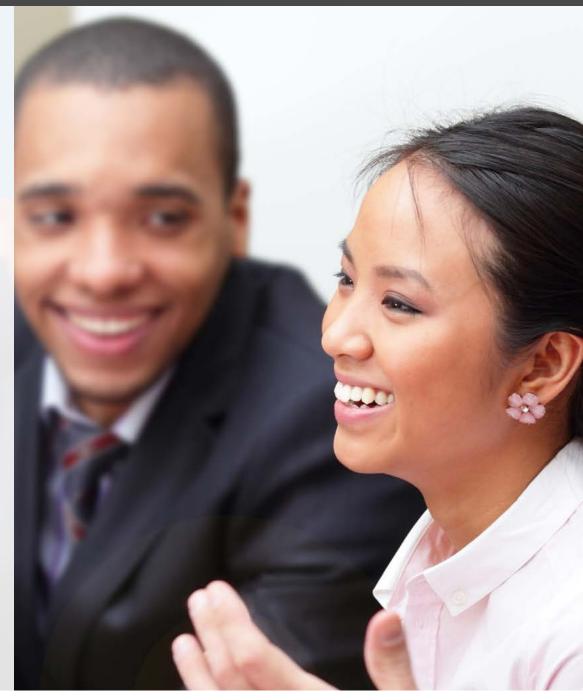


BE COURAGEOUS

TAKE ACTION BIG OR SMALL -OWN IT.

Our performance aligns with our thinking about who we are as a company and how we want to achieve the best results. Accountability and ethics guide every action we take. That's why we've received repeated recognition as one of the World's Most Ethical Companies, along with awards for climate leadership; diversity, inclusion and equality; and being a top workplace.

It's about Ethics. Every Day. Everyone. Everywhere.











ACT ETHICALLY/ **SHARE CONCERNS**

Our Code of Ethics and Business Conduct is a guide to behaving ethically every day at The Hartford. Our Code is a resource for everyone - including officers, managers and employees - as well as the people with whom we do business, such as agents, vendors, consultants and other business partners.

To help you feel confident that you are always doing the right thing, the Code addresses specific topics and tells you where to turn for help. This includes how to report a situation that doesn't seem right.

In this topic you will learn about:

- · How to make good decisions
- Ways to share concerns
- · Anonymous reporting and non-retaliation

LEARN MORE











Code of Ethics and Business Conduct 6 The Hartford







ETHICS IN ACTION

Sharing concerns about compliance with our Code, policies or the law is not optional - it is an obligation of everyone at The Hartford

Our Code

Our Code of Ethics and Business Conduct is one of the cornerstones of our business, and it helps guide our ethics and compliance program. It explains how we can live our values throughout everything we do at The Hartford.

Making Good Decisions

Our Code serves as a guide for making good decisions and conducting business ethically. Consult it for guidance and clarification as you go about your work, and review it regularly as a reminder of our values and standards. We must hold ourselves to these standards each day, because we are daily faced with decisions and actions that allow us to make a difference and live the principles in our Code. By doing the right thing, we foster a culture of compliance and make The Hartford a top workplace.

At The Hartford, our customers are at the center of everything we do. As such, all employees are expected to perform the responsibilities and duties of their role as assigned. Work avoidance behaviors that negatively impact our customers or teammates will be subject to disciplinary action in accordance with the Employee Performance and Behaviors Improvement Policy.

Examples of work avoidance include but are not limited to:

- Disconnecting or inappropriately transferring calls
- Misuse of system and/or phone codes
- Task manipulation; misrepresentation of system data

Ways to Share Concerns

If you know of or suspect violations of our Code or the law, you can share your concern in many ways, including:

- Talk to a manager.
- Contact Employee Relations.
- · Contact your Compliance Officer.
- · Contact the Chief Ethics & Compliance Officer.
- Contact EthicsPoint, The Hartford's outside service provider.

If the matter involves accounting, internal controls or auditing, you should report it to the General Auditor, who will then review the matter with the Audit Committee of The Hartford's Board of Directors.

Attorneys at The Hartford must report any Code violations in accordance with our SEC Attorney Conduct Rules. These rules describe how to comply with the reporting requirements of Section 307 of the Sarbanes-Oxley Act. Any questions should be addressed to Terence Shields.

If you are a UK employee, you may also report pursuant to the International Whistleblower Policy.







Anonymous Reporting and Non-Retaliation

If you want to share your concerns anonymously, the best way is to contact EthicsPoint, our outside service provider.

Keep in mind that if you choose to remain anonymous, it may limit The Hartford's ability to thoroughly investigate the matter. Once an investigation is underway, we are fully committed to protecting the confidentiality of all reports to the extent possible, although we cannot guarantee anonymity.

All reports of compliance concerns should be made in good faith, which simply means that you honestly believe that your report is truthful. The Hartford does not tolerate retaliation against anyone who shares their concerns in good faith. If you do suspect any retaliation or disciplinary action for sharing your concerns, be sure to report it immediately.

The Role of Managers

Managers play an important role in promoting our culture of ethics and compliance. Managers must set the right tone and always be role models of appropriate behavior in accordance with our values, the Code and other Hartford policies, and applicable laws. As a manager, you are accountable always to:

- Ensure that your employees understand their responsibilities under the Code and other policies.
- Take opportunities to discuss the Code with employees and reinforce the importance of ethics and compliance.
- Create an environment where employees feel comfortable raising concerns.
- · Help employees understand the value of acting with integrity - when evaluating an employee's job performance and behaviors, always consider his or her conduct in relation to the law, the Code and our policies.



- · Encourage ethical conduct and compliance with our values, the law, the Code and our policies, and discourage questionable action to achieve short-term business results.
- · Immediately report known or suspected violations of the law, the Code or our policies to your Compliance Officer or the Chief Ethics & Compliance Officer.

Managers should handle ethical questions or concerns from employees appropriately:

- Don't promise complete confidentiality to the employee in advance - as a manager you may have a duty to disclose the matter.
- Listen carefully and give the employee your complete attention.
- Get all the facts ask for clarification and additional information.
- Answer any questions if you can, but don't feel that you have to give an immediate response.
- If an employee raises a concern that you think may involve a potential violation of law or the Code, or that may require further investigation, contact your Compliance Officer or the Chief Ethics & Compliance Officer.







EXECUSION AID

As you make decisions at work on a daily basis, you should consult the Code and our policies for guidance. Also consider any laws that apply to your situation. Since we cannot describe every potential scenario that you may encounter, we have

created this Ethical Decision Aid with questions to lead you to the right decision. Nothing in our Code or guidelines is intended to restrict an employee's ability to engage in protected communications and activities.

Does it Could it Would it Would it be IF YOU Does it conflict with violate adversely look bad harmful if all **ANSWERED** our vision or affect our employees **YES** TO our Code, as a news behaviors? stakeholders? headline? did it? **A SINGLE** policies or the law? QUESTION, DON'T DO IT.







Q-A ETHICAL DILEMMAS

Q: How does EthicsPoint work?

A: Our independent, third party service provider is always available to receive your compliance concerns, 24 hours a day, seven days a week. You can submit a report at www.EthicsPoint.com or call (866) 737-6812 in the U.S. and Canada, or (866) 737-6850 in all other countries. Either way, EthicsPoint will send your report – anonymously if you choose – to The Hartford for follow-up and investigation.

Q: What if I only suspect a violation but don't have all the details?

A: If you have a good faith belief that there has been a potential violation of our Code, policies or the law by anyone affiliated with The Hartford, including business partners, you are obligated to report the matter. Speak up right away to give The Hartford a chance to minimize the risk of legal or financial exposure, as well as possible damage to the reputation we all have worked to build.

Q: Where can I find The Hartford's policies?

A: Direct links to policies referenced in this code can be found in the <u>More Information</u> section. You can also find our policies on the Ethics and Compliance section of iConnect.











BE CURIOUS, TRANSPARENT AND INNOVATE TOGETHER - SOLVE IT.

When we act to include others – sharing knowledge, opinions and decision-making with respect for our differences – everyone benefits. Legally and ethically, we have a responsibility to act in a way that recognizes diverse talents, backgrounds and points of view.

It's about Ethics. Every Day. Everyone. Everywhere.









RESPECT OTHERS

When we respect other people and ourselves, we naturally avoid harmful and hurtful behaviors. We have both legal and ethical obligations to be considerate and avoid harming others either emotionally or physically.

In this section you will learn how to deal with:

- Harassment and discrimination
- Bullying and abusive conduct
- Drugs and alcohol abuse
- Safety threats















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ETHICS IN ACTION

Having a positive work environment enhances job satisfaction, improves work performance, and helps us continue to attract and retain top-quality employees who value an ethical work culture.

Harassment and Discrimination

Harassment and discrimination are illegal acts against others based on personal differences such as race, color, gender, religion, age, national origin, disability, veteran status, sexual orientation, gender identity, marital status, ancestry or citizenship status.

The Hartford does not tolerate any form of workplace harassment or discrimination. We offer equal employment opportunity and make merit-based employment decisions for recruitment, hiring, compensation, training, promotion and termination.

You should:

- · Avoid any kind of harassing or intimidating behavior.
- Keep our workplace free of offensive jokes and the display of offensive material
- · Never make unwanted physical contact or sexual advances in the workplace.
- · Avoid interfering with someone's work performance.
- Never exhibit hostile behavior or make threats.
- Respect the personal differences of co-workers.

Immediately report any form of harassment or discrimination you encounter through work, regardless of whether the offender is an employee or non-employee or whether that person is on our premises, working off-site or at an off-site business function.



Bullying and Abusive Conduct

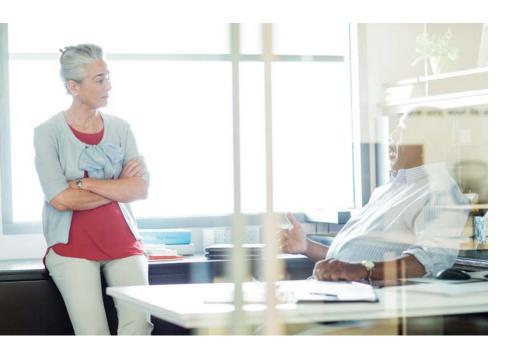
Bullying and abusive conduct are terms that refer to the persistent or severe mistreatment of others, not necessarily based on personal differences like harassment and discrimination. The mistreatment can include verbal, nonverbal, psychological and physical abuse, as well as humiliation.

Mistreatment of others at work can cause significant stress and result in poor work performance, illnesses, absences and low morale. It is very important to treat others at work with respect, and to report any behavior that seems bullying and abusive.









Drugs and Alcohol Abuse

To be your best at work, don't use alcohol, illegal drugs or other substances that impair your ability to do your job. We don't allow the sale, distribution, purchase, possession or use of illegal drugs - or the abuse of legally prescribed drugs - on our premises or while working off-site. Always use good judgment and moderation when alcohol is served at business events.

Safety Threats

The Hartford cares about your safety and the safety of others, and we want you to feel safe and secure while working.

We do not allow threatening behavior, violent conduct or dangerous substances at any workplace location or at an off-site function. We do not allow weapons in any building containing a Hartford office and, to the extent permitted by law, at any Hartford location or off-site function.

While driving for business or operating a company vehicle for business or personal use, refrain from activities that distract you from driving. Also, be sure to comply with all federal, state and local laws concerning distracted driving and cell phone usage. To the extent the law permits you to use a cell phone while driving, you must use a hands-free device with voice-activated dialing features.

The U.S. prohibits financial services companies like The Hartford from employing or doing business with people who have been convicted of certain crimes. In addition, we do not want to employ people with convictions that suggest a potential risk to our employees or our company. As a result, you must notify us if you, another employee or a business partner are or have been involved with any of the following criminal actions:

- A conviction for any crime involving your conduct in the financial services industry.
- · A conviction for any crime involving dishonesty, breach of trust, violence, sexual misconduct or illegal possession of firearms.
- A conviction for a drug-related crime involving conduct that occurred on The Hartford property or while engaged in The Hartford business.
- A pretrial diversion or intervention program related to a criminal prosecution involving dishonesty, breach of trust or money laundering.



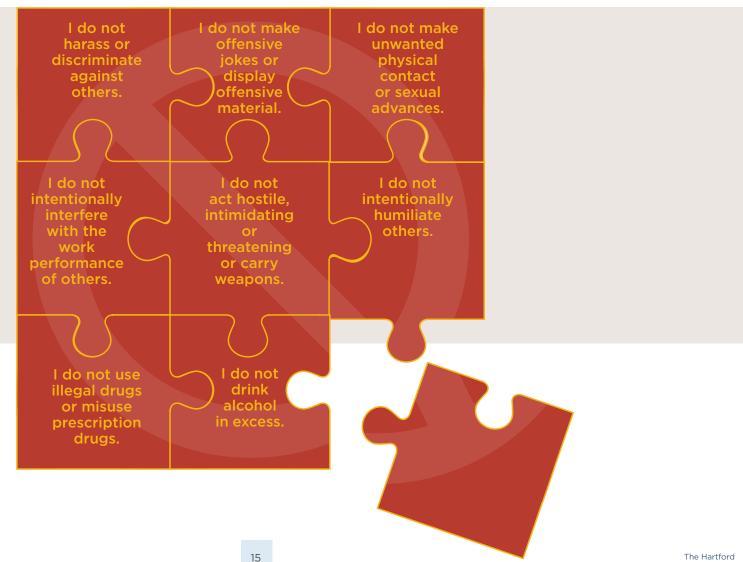






Treat others with respect and use good judgment in how you conduct yourself at work.

TO BUILD TEAMWORK AND RESPECT OTHERS...









QA ETHICAL DILEMMAS

Q: Can a sexually oriented joke be a form of harassment?

A: Yes, especially if it is unwelcome. Jokes, cartoons, photographs, videos, emails or any other sexually related material should not be discussed, displayed or distributed anywhere in the workplace. What is funny or harmless to one person may be intimidating or offensive to another.

Q: Someone threatened me at work during an argument. Should I just ignore it and let it go?

A: No. Everyone has the right to feel safe and secure in the workplace. It is never appropriate to ignore threats of violence. Immediately inform a manager or report it to Security at (877) 55B-SAFE.











AVOID AND DISCLOSE CONFLICTS OF INTEREST

A conflict of interest between your interests and activities and The Hartford's interests and activities can cause serious damage. Even the appearance of a conflict of interest can be harmful. That is why you must recognize, avoid and promptly disclose any potential conflict of interest - only then can we manage the situation.

In this section you will learn about:

- $\boldsymbol{\cdot}$ How to recognize conflicts of interest
- Ways to avoid conflicts of interest
- Common conflicts of interest
- Financial conflicts of interest
- Disclosure of conflicts of interest

LEARN MORE

















A conflict of interest is something that interferes with your job or your ability to decide and act in the best interest of The Hartford. It can also be something that competes with or interferes with The Hartford's ties to vendors, customers and business partners. It can be a personal activity, relationship, financial matter or obligation.

Common Conflicts of Interest

The types of activities employees engage in are diverse. So are the situations they find themselves in from time to time.

Conflicts of interest commonly arise from:

- · Social media networking
- Political activities
- Personal relationships
- Volunteering
- Outside employment
- Investments

How to Recognize Conflicts of Interest

It may be difficult to recognize whether your activities and interests outside of work are interfering with your ability to act in the best interest of The Hartford. Use the following checklist to help you:

- Is the activity competing with The Hartford or providing goods and services to the company?
- Is the activity taking away time from your work?
- Are you using our company assets for your personal use?
- · Are you taking opportunities away from The Hartford that you find out about at work?
- Does the activity support interests that are contrary to those of The Hartford?

If you can answer Yes to any of these questions, then you may have a conflict of interest unless it involves employee protected communications and activities. Discuss the matter with your manager or Compliance Officer for more guidance. If you can answer No to all of the questions, then you probably do not have a conflict of interest, but it is always appropriate to ask to be sure.

Ways to Avoid Conflicts of Interest

Throughout all of your activities, you can typically avoid conflicts of interest with The Hartford if you follow our simple Do's and Don'ts Decision Aid. Keep in mind that these guidelines are not meant to restrict employee protected communications and activities.

Think about potential conflicts of interest whenever you use social media, earn money through a side job or business, engage in political activity, do volunteer work, make investments, give endorsements, help relatives, pursue romantic partners or engage in some other personal activity, except for protected communications and activities.

Additional guidance on social media use can be found on iConnect and in this video.

Keep in mind that aside from protected communications and activities, use of The Hartford name, brand or logo is permitted only if approved by External Communications and Marketing/Brand and as detailed in the Media Relations and Social Media policies.







Outside Employment Conflicts of Interest

Seek approval from your Compliance Officer in advance for the following activities because of the strong possibility of a conflict of interest:

- You are an attorney or accountant and want to practice on the side.
- · You are asked to serve as an expert witness.
- You want to serve on the board of directors or be an executive of a for-profit corporation.
- · You want to do work of any kind on the side for a competitor or business partner of The Hartford.

Executives of The Hartford generally cannot directly or indirectly solicit, encourage or induce an employee to terminate employment with us. This restriction on employee solicitation continues for one year after the executive's employment is terminated for any reason.

Board of Director Conflicts of Interest

Before agreeing to serve on a board of directors (other than a Hartford-owned company), you should discuss it with your manager and inform the Chief Ethics & Compliance Officer. You will need the consent of the Chief Ethics & Compliance Officer to serve on the board of an outside, for-profit organization.

Any such role with a **nonprofit organization** should be evaluated by you, your manager, and if appropriate, your Compliance Officer to determine if your service will create any actual or perceived conflict of interest or interfere with your job duties.

As you carry out your outside board duties, always remember to excuse yourself from participating in any discussions or decisions that could be in conflict with The Hartford's interests. Understand that any approval to serve on an outside board does not mean that The Hartford endorses or supports any action you take in that capacity. Always make it clear to the organization that you are serving in your personal capacity and not as a representative of The Hartford. And remember that employees who serve on the board of a nonprofit organization are always responsible for any financial contributions they may be expected or choose to make as board members.









Directors and Officers Insurance

You will not be automatically entitled to Directors and Officers ("D&O") insurance liability coverage under The Hartford's insurance programs when serving as an outside board member. However, if you are an Executive and/or officer of The Hartford, and you have been asked in writing by a Hartford Executive Leadership Team member to serve on the board of a specific nonprofit organization to further The Hartford's commitment to serving our communities, you will be covered under The Hartford's D&O insurance program. In these situations, you should contact The Hartford's Corporate Risk Management Department for more information about The Hartford's D&O insurance program; you may also contact the Corporate Risk Management Department if you have any other questions about D&O insurance related to your outside board service if performed at the request of The Hartford. In most cases, however, you will need to check with the organization on whose board you will serve to ensure you have proper D&O insurance coverage.



Personal Relationships Conflicts of Interest

Closely related persons cannot work at The Hartford if one person has management control over the other person's employment or if they share responsibilities for financial or audit controls, unless approved by Human Resources and the Law Department.

Political Activities Conflicts of Interest

You are free to express your individual political views and support candidates of your choice. You can also run for elected office on your own time and expense. Always be mindful of appearances though, and make it clear that you do not represent or speak on behalf of The Hartford in these matters.

You can request reasonable adjustments in your work schedule or a leave of absence without pay to campaign for elected office, subject to management approval and any state law restrictions.

The Hartford supports and promotes political involvement by using corporate funds to promote voter registration, nonpartisan voter education and issue education, and grassroots lobbying to influence legislation and ballot referenda. We do not give corporate contributions to political candidates or parties even where allowed by law. If you would like to use corporate funds for any of these approved nonpartisan voter education purposes, you must get prior approval from the Government Affairs Group.

Additional information about The Hartford's political activities is available here.







Financial Conflicts of Interest

If you or a member of your household who is related by blood or marriage obtains a significant financial interest in a company with ties to The Hartford, there may be a conflict of interest. It is best to avoid investing in our competitors, vendors and business partners.

Conflicts of interest may also arise if The Hartford makes personal loans, extensions of credit or loan guarantees to employees or their immediate family members. With the exception of loans permitted under a company employee benefit plan, we cannot make personal loans or other extensions of credit to employees or their immediate family members, unless approved beforehand by the General Counsel and Chief Ethics & Compliance Officer.

Disclosure of Conflicts of Interest

As soon as you become aware of any potential or actual conflict of interest, report it immediately to your manager or Compliance Officer via AskLaw, select your line of business under 'I have a request for' and select Gifts & Entertainment - Conflicts of Interest under 'Category.' You will then receive further guidance on whether you need written approval from other parties, or whether you need to take additional steps to resolve the situation.

If you think someone else at The Hartford has a potential conflict of interest, you can also report that without any fear of retaliation. You can also make an anonymous report through EthicsPoint.

It is important to report all possible conflicts of interest so we can manage them properly.











Is your activity creating a conflict of interest?

Continue to view another Decision Aid »









DECISION AID

Ways to avoid a conflict of interest

- >> Be clear you are speaking on your own behalf and not as a representative of The Hartford when giving your own opinions and recommendations.
- >> Disclose your connection to The Hartford when endorsing our products and services.
- >> When acting for another entity or person besides The Hartford, excuse yourself from any actions, discussions or decisions that might conflict with our interests.
- >> Consider personal relationships with relatives or romantic partners and the potential or perception for bias or influence in a situation with The Hartford directly or in a business relationship impacting The Hartford such as a third-party vendor or customer.





Continue to view another Decision Aid »

- >> Don't let your outside activities interfere with your work time or productivity.
- >> Don't use company assets for personal uses.
- » Don't take personal advantage of information and opportunities you discover through your work for The Hartford.
- >> Don't compete with The Hartford or get financially involved with competitors, vendors, business partners or others connected to The Hartford.
- >> Don't make any public or private statements to anyone about The Hartford customers, clients or applicants unless they have a business reason to know and you have obtained any required permissions.









Financial conflict of interest

« Return to first Decision Aid



You and/or a member of your household related by blood or marriage, including extended family such as parents, stepparents, siblings, in-laws and children



Any significant financial interest in a competitor or business partner of The Hartford, or an organization or activity affected by your actions with The Hartford



TO DETERMINE

It is a significant financial interest if the total fair market value exceeds your annual base salary or 5% of your net worth (whichever is less) or 5% ownership interest



OBLIGATION

Report this immediately to The Hartford's Chief **Ethics & Compliance** Officer, whether you or your relatives are considering such a financial investment or already have it









Q: I have a personal side business that I conduct from home on the weekends. Do I need to disclose my activities?

A: Only if there is a conflict of interest. Not all businesses create a conflict of interest. Ask yourself:

- Is it competing with or providing goods and services to The Hartford?
- Is it taking away time from your work for The Hartford?
- Are you using The Hartford's assets for your personal use?
- Are you taking opportunities away from The Hartford that you find out about at work?
- Does the business support interests that are contrary to those of The Hartford?

If all of these answers are no, then there is probably no conflict of interest, but you can always check with your manager or your Compliance Officer to be sure.



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PROTECT WHAT IS OURS

Whether we are working at the office or remotely, we must carefully protect the information that has been entrusted to us and that we create. This includes personnel data, customer files, financial records, trade secrets, business plans or any other confidential tangible or intangible asset. Only access and disclose the minimum data as needed and permitted, and take necessary precautions to protect it.

In this section you will learn how to protect:

- Information security
- Customer privacy
- Intellectual property
- · Material nonpublic information
- Records for retention and legal holds
- Company assets

LEARN MORE

















Our customers, employees and business partners entrust us with personal and confidential information, and we each play a critical role in protecting that information.

Information Security

Consequences of a data breach can be severe. That is why we have an entire intranet site - iProtect - dedicated to our standards, policies and procedures for information protection.

One of the most common causes of a data breach is through phishing emails where scammers attempt to manipulate people into divulging confidential or sensitive information that they will use to commit fraud or obtain access to The Hartford's systems. Please send all suspicious emails to anti-phish@thehartford.com by selecting the Report Phish button in Outlook.

Another cause of data breaches is through the loss or theft of portable devices such as laptops, smartphones and flash drives. Be extra careful to keep all portable data storage devices secure at the office and when traveling on business or working remotely. Observe secure work area guidelines in your workplace whether you work in the office or remotely.

Customer and Employee Privacy

The Hartford's company confidential information should be classified and marked confidential and should not be disclosed outside the company without proper protection and authorization. Privacy laws and our contractual obligations restrict the ways we can share certain customer, employee or business partner information. If you do not know whether you can share information, contact Privacy Law or your Compliance Officer.

Even when you are permitted to share information, only access and disclose the minimum amount of information needed for a legitimate business purpose, or as required by law. Encrypt highly restricted, personally identifiable and company confidential information before sending electronically. For example, you should encrypt electronic communications containing Social Security numbers, identification numbers, credit or debit card numbers, passwords or PIN numbers, medical information, or other data that would allow a person to be identified, as well as company confidential information. Customer credit and debit card payments should be processed/recorded only through secure payment channels and should never be written down or recorded outside of those systems.

You must report any suspected or actual unauthorized access to or disclosure of information, including consumers' data, by calling the Help Desk at 855-893-4357 and data incidents in myTechExpress (MTE) portal. Report all information incidents whether intentional or inadvertent. To learn more about the information you must protect, visit iProtect.









Intellectual Property

You should protect The Hartford's intellectual property. You should not allow the unauthorized reproduction or distribution of our software or created materials or any other unauthorized use of our intellectual property and information assets. These are all protected by copyright. Hartford confidential information should be classified and marked confidential and should not be disclosed outside the company without proper protection and authorization. Understand and follow all standards, policies and procedures that tell you how to protect, use, store, transmit, share and destroy data and information. Standards cover, for example, new technology platforms such as for the use of social media, company web meetings and blogs, and Bring Your Own Device software. If you leave the company, you can't remove, copy, use or disclose any proprietary or confidential company or customer information.

The Hartford's brand including its name, stag logo and trademarks is one of our most important corporate assets. You should not use the brand or Hartford trademarks without prior company authorization, and any authorized use needs to be in accordance with the company's policies.

You should also respect the intellectual property rights of third parties. Ensure that you have the appropriate rights and permissions before using any third party materials.

Other Company Assets

You also should protect all of The Hartford's other assets, such as physical devices, computer files and materials. All company property in your possession must be returned at the appropriate time, such as after employment ends.

Occasionally an employee will receive a payment from us to which they are not entitled, such as an overpayment of wages, benefits, or an incorrect expense reimbursement. This can occur even after an employee leaves the company. Regardless of the cause or the timing, you are required to repay any such overpayments as soon as possible. Failure to do so is considered a violation of this Code.

Material Nonpublic Information (Insider Trading)

Material nonpublic information includes any information not yet known to the public that a reasonable investor might consider relevant to making a decision to invest in our securities. Buying or selling securities while in possession of material nonpublic information - or sharing such information with others - so that they may trade - is illegal, unethical, and erodes trust in the marketplace. You and your immediate family members are prohibited from disclosing or using any material nonpublic information gained in the course of your employment for buying or selling securities. Also, failure to protect and control the distribution of material nonpublic and other sensitive information could harm the company and potentially violate securities laws. You should consult with the Law Department before communicating information about the company's capital, financial results and outlooks, business plans, ratings or strategy (whether or not previously disclosed).







Records Retention and Legal Holds

We keep records as long as required by law and as reasonably necessary to conduct our business. Our business records can be in any form, including:

- · Hard print (paper documents, forms, reports, manuals, and files)
- Electronic or computer files (spreadsheets, databases, word-processed documents, and email messages)
- Other formats (video tapes, audio tapes, microfilm, voicemails, and photographs)

If you are unsure if something is a business record, refer to the Records Management Policy or ask your manager.

In order to ensure we have a proper record of business activities and communications, employees must only use approved devices for business-related communication. Employees who wish to use mobile devices such as smartphones and tablets must do so either with a company-owned device or by having the proper Hartford Mobile Access technology applied to their own personal device via MyTechExpress.

Refer to the Do's and Dont's chart for additional guidance.

Additional details on the Mobile Device Policy and mobile use can be located on the M365 Mobile site.

Sometimes we may issue a "legal hold" notice that will tell you to keep certain records past their established retention period because of an actual or threatened legal matter. If you receive a document preservation notice you may not dispose of relevant records until the legal hold has been lifted.

Follow these "Records Rules":

- Never tamper with, manipulate, alter, or conceal business records.
- · Never remove or destroy business records before the end of the applicable retention period or if they are subject to a "legal hold."
- Never make a false or misleading entry in a report or record.
- Never attempt to affect a record's integrity or availability for use in an official proceeding.
- · Always take any necessary action to prevent automatic destruction of your records that are subject to a "legal hold."

If you receive a subpoena or other request for documents or information from any governmental department, regulatory agency, law enforcement office or law firm, you should report it immediately to the Law Department or the Chief Ethics & Compliance Officer.

If there is an investigation, whether internal or external, you must be truthful and cooperate fully or face potential disciplinary action up to and including termination. Remember:

- · Do not make any false or misleading statements.
- Do not conceal or destroy any records or other possible evidence.









To report a security incident or data incident, please call 855-8WE-HELP/855-893-4357 or through myTechExpress (MTE) portal. Examples of Information Security Events you must report are shown below:

Continue to view another Decision Aid »

EXAMPLES OF SECURITY AND DATA INCIDENTS



• Computing device loss or theft · Inadvertent mailing • System break-ins • Inadvertent email Virus attacks Inadvertent disclosure • Hardcopy information theft Inadvertent fax • Improper document/media disposal • Software or data tampering









Follow our Records Rules to ensure that we comply with the law and keep our records for as long as we need them to conduct our business.

« Return to first Decision Aid

RECORDS RULES

Never attempt to affect a record's integrity or availability for use in an official proceeding.

Never tamper with, manipulate, alter, or conceal business records.

Always take any necessary action to prevent automatic destruction of your records subject to a "legal hold."

Never make a false or misleading entry in a report or record.

Never remove or destroy business records before the end of the applicable retention period or if they are subject to a "legal hold."

RECORDS RULES







ETHICAL DILEMMAS

Q: Can I do personal Internet searches on a company computer while working from home?

A: The same behavior guidelines apply regardless of your work location. Minimal personal use of company equipment is ok if it does not interfere with your job, the internet sites do not contain inappropriate content, and you are careful to avoid viruses and malware.

Q: Sally inadvertently emailed a claims file to the wrong customer. What should she do now?

A: She should report a data incident by submitting a ticket in myTechExpress (MTE) portal or by calling

855-8WE-HELP/855-893-4357.

Q: A shareholder opened her mail and was happy to receive a copy of a confirmation statement that confirmed recent transactions...until she realized that she also received another customer's confirmation statement enclosed in the envelope. Immediately the shareholder called our contact center. What steps do we take to report this customer incident?

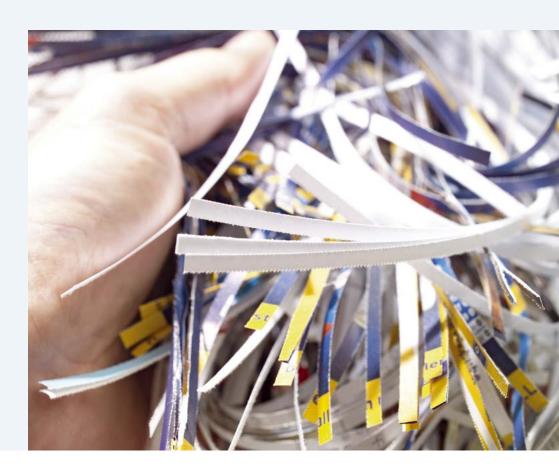
A: We should report a data incident by submitting a ticket in myTechExpress (MTE) portal or by calling

855-8WE-HELP/855-893-4357.

Q: Raymond did not feel like walking to the shredding bin that was across the hall and instead put some customer information paperwork in his regular trash can. Since improperly disposing of client information places The Hartford at risk, what should you do when you learn of improper document or media disposal?

A: You should report a data incident by submitting a ticket in myTechExpress (MTE) portal or by calling

855-8WE-HELP/855-893-4357.









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DEMONSTRATE OUR TRUE CHARACTER TO OUR CUSTOMERS, CO-WORKERS AND COMMUNITIES - LIVE IT.

For more than 200 years, we've built trusted relationships that our customers value. Being honorable and fair while keeping our promises every day has been rewarded with their loyalty, and is a major reason for our success.

It's about Ethics. Every Day. Everyone. Everywhere.











FOLLOW GIFTS AND ENTERTAINMENT POLICIES

Offering or accepting gifts and entertainment with a customer or business partner can be one of the more enjoyable aspects of work, and can help us improve and solidify business relationships. However, we must always take care not to create any appearance of an improper attempt to influence business decisions. When ethics prevail and instruct us in the way we offer and accept gifts and entertainment, there can be no appearance of a conflict of interest or impropriety.

In this topic you will learn how to recognize:

- · Acceptable gifts and entertainment
- Unacceptable gifts and entertainment
- · Gifts and entertainment needing approval

LEARN MORE















ETHICS IN ACTION

Gifts and entertainment can consist of anything of value including meals, discounts, tickets, lodging, prizes, services, products, transportation and home improvements.

Acceptable Gifts and Entertainment

Whether given or received, gifts and entertainment should be-

- For a legitimate business purpose not to influence business decisions
- Inexpensive or of a promotional nature not lavish, unusual or extravagant
- · Customary, reasonable and proper under particular business circumstances
- · Not in violation of policies (ours or the other party's if known)

Unacceptable Gifts and Entertainment

You should never:

- Exchange cash or a cash equivalent such as stocks and stock options, loans, checks or gift certificates that can be converted to cash
- Exchange gifts or entertainment with any government official - including representatives of a government-owned or controlled business - unless it is in strict compliance with our policies on managing government relationships

Gifts and Entertainment Needing Approval

If the gift or entertainment complies with our basic guidelines for what is acceptable then it should be ok provided you get written approval for exchanges over a certain U.S. dollar limit as shown in the Gifts and Entertainment Decision Aid.

You should ideally get the required approval in advance of the exchange, but if that is not possible then obtain it as soon after as you can.

Approval should come from your manager that reports directly to the Executive Leadership Team, and your Compliance Officer through Coupa. For additional information see the Travel, Expense & Entertainment Pre-Approval Form.









Special Gift and Entertainment Rules for Claim Employees:

Because Claim employees, in some instances, have claim or benefit payment authority, or work extensively with outside vendors, all Claim employees, and members of their immediate families, are prohibited from accepting or giving any gifts that are beyond nominal value. This means that any item other than a token promotional item, such as a plastic pen or baseball hat, should not be given as a gift, and if received, should be refused or returned.

Also, Claim employees may not participate in any entertainment other than a group business meal, which should not be extravagant and which should cost less than \$100 per person. This restriction applies to any manner of entertainment, including but not limited to sports events, golf outings, theater events, and trips, or the use of any car, boat, vacation property or other item for a reduced cost or for free.

Finally, Claim employees may not use their position with The Hartford to solicit or accept any special discounts from vendors and may only take advantage of vendor discounts when they are offered to all employees of The Hartford through contractual or published agreements, or are consistent with standard pricing offered by the vendor to the public.

Special Gift and Entertainment Rules for Hartford Funds Employees

If you work for Hartford Funds, please contact your Compliance Officer.



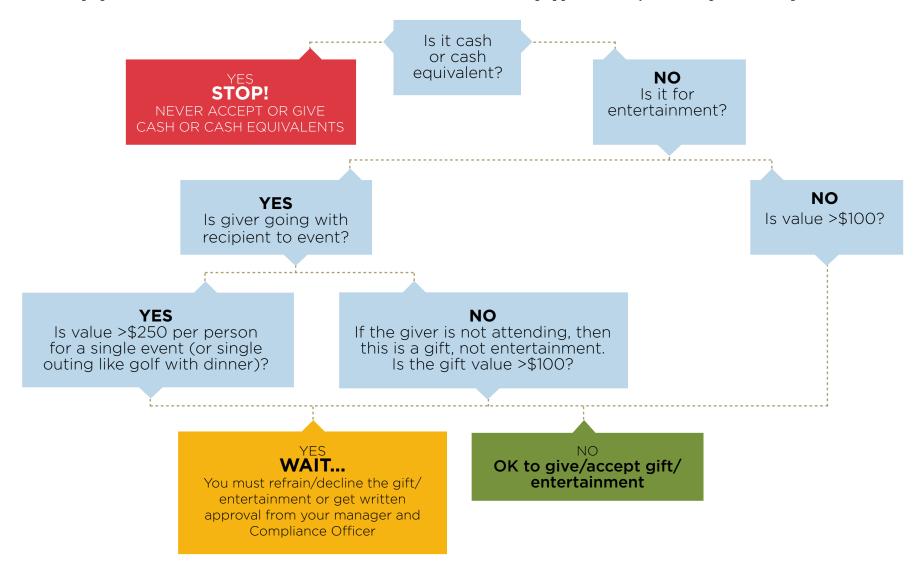






DECISION AID

Our Gifts and Entertainment Decision Aid shows our standard U.S. dollar limits beyond which you should get written approval, whether you are giving or receiving the gifts and entertainment, unless you are a Claim Employee or a Hartford Funds Employee. International employees should not accept gifts over £50 or entertainment valued at over £200 without obtaining approval from your manager and Compliance Officer.









ETHICAL DILEMMAS

Q: I work in Operations & Technology and I received tickets from a business partner to attend a show, but the partner is not going with me. Which limit applies - the gift limit or the entertainment limit?

A: If you are simply accepting tickets from a business partner, the U.S. \$100 gift limit applies. If the partner were actually going with you to the event, then the \$250 entertainment limit would apply.

Q: I'm in sales and underwriting and I want to take some agents to a tennis tournament followed by dinner. Should I include both activities in calculating the U.S. \$250 per person entertainment limit?

A: Yes. All activities that are done on one outing back to back are considered a "single event" and should be added together for calculating the per person limit.

Q: I work in the Claim organization and an auto body shop sent me a holiday gift basket worth about \$50 with a card offering me a 20% discount on labor if I ever need work done on my car. Can I accept either one of these?

A: No. Special gift and entertainment rules apply to all employees in the Claim organization. Even though the holiday basket is worth less than \$100, no Claim employee can give or accept any gift worth more than a nominal amount, such as a branded coffee cup. Claim employees may never accept discount offers unless they are part of a formal program offered to all employees of The Hartford or the general public.











MANAGE GOVERNMENT **RELATIONSHIPS**

We manage our government relationships in the United States and throughout the world with the highest ethical standards. Honesty and integrity form the foundation on which we build these relationships. We have zero tolerance for any attempt to improperly influence government officials.

In this section you will learn about:

- · Working with U.S. government officials
- U.S. government interactions needing approval
- "Pay-to-play" restrictions
- Working with non-U.S. government officials

LEARN MORE



















Providing something of value to a government official to influence laws and decisions, get a business deal or obtain some other advantage is unethical and illegal. We must build and maintain honest and ethical government relationships, whether directly or through any third parties acting on our behalf.

Working with U.S. Government Officials

Many activities that can seem innocent to you can actually be in violation of laws. The Hartford's policies require that you get prior written approval for many activities involving government officials or political candidates. Contact the Government Affairs Group for more information.

Be aware that:

- The restrictions can impact not just you, but also members of your family
- The restrictions can apply to interactions with not just obvious government officials, but also with representatives of agencies, corporations and other entities that are owned or controlled by governments

Always review this Code and our policies before you provide anything of value to anyone connected with a government entity, or before you attempt to influence or sell to any government official. Our policies help protect you and The Hartford.



U.S. Government Interactions Needing Approval

Employees of The Hartford may not engage in any of the following activities without first getting approval from the Government Affairs Group:

- Make contacts to influence legislation, regulatory policy or rulemaking
- · Contact senior-level state and federal insurance department officials and their staffs to try to influence regulatory policy or rulemaking
- · Hire outside counsel, public affairs firms or consultants to lobby government officials
- Hire third parties to promote the sale of The Hartford's products to government entities
- Offer any gifts, gratuities or entertainment even of a token nature - for the personal use of any government official or employee







For sales activity, your Compliance Officer should notify the Government Affairs Group before you:

- · Contact any government officials or employees related to sales
- Submit bids or sales documents to government officials or employees



Political Donation Restrictions for U.S. State and Local Elections

If you are an officer, an employee in Tiers 1-5, a provider of investment advisory services to U.S. state and local governments (including all employees of The Hartford Investment Management Company) or an employee responsible for soliciting and negotiating contracts with U.S. state and local governments, then you need to get approval from the Corporate Compliance Unit before you:

- · Contribute to or help raise funds for a state or local elected official or candidate, whether directly or through a political party or political action committee (PAC). Note - prior approval is not needed to contribute to our corporate PAC, The Hartford Advocates Fund.
- Let a member of your immediate family participate in such activities

Certain donations may prevent The Hartford from competing for business with city and state governments. To protect our ability to keep and compete for business, make sure you get the required pre-clearance before you, a spouse or dependent child engages in the political activities described. These restrictions do not apply to contributions for U.S. federal office unless that candidate currently holds a state or local office. For more information review the Pay to Play Policy.

Working with Non-U.S. Government Officials

Wherever we conduct business in the world and deal with government officials, we must comply with multiple anti-bribery and anti-corruption laws and regulations, such as the U.S. Foreign Corrupt Practices Act (FCPA), U.K. Bribery Act and the Canadian Corruption of Foreign Public Officials Act. Consequences for not complying can be severe, for both you and The Hartford.







Tips to Avoid Bribery

To avoid being guilty of bribery, you cannot give anything of value - directly or through a third party - to:

- Any officer or employee of a foreign government or any department, agency or instrumentality of a foreign government
- Any person acting in an official capacity for or on behalf of any foreign government, department, agency, or instrumentality
- Any employee of an entity owned or controlled by a foreign government, which commonly includes foreign oil and gas entities, hospitals and medical care facilities, defense contractors, education organizations, labs and research facilities, telecommunication companies, energy distribution companies and real estate companies
- Any officer or employee of a commercial organization for the purpose of gaining a business advantage

There is no minimum value to what may be considered a bribe. Gifts, commissions, offers of employment, stock or stock options, use of materials or equipment, use of facilities, services, transportation, insurance benefits, property and cash or cash equivalents could be considered a bribe under U.S. and various international laws.

Dealing with Third Parties

Third parties cannot offer bribes on our behalf. If you are involved with third parties that contact foreign government officials, including insurance regulators, or foreign entities for any reason involving The Hartford, you must be alert for suspicious

or unusual activity that could indicate potential bribery and corruption. Warning signs include:

- Refusal to accept an anti-bribery/anti-corruption clause in a contract
- A reputation for bribery or breaking laws
- A close relationship with foreign government officials
- Unusually high commissions
- Payment to an account outside the country of residence
- Undisclosed principals or subcontractors sharing fees
- Payments/expenses that are not documented with regard to purpose or payee

Facilitation Fees

Facilitating payments are monetary payments made in order to expedite the performance of routine, non-discretionary governmental actions in a foreign country. Such payments are prohibited in some countries in which The Hartford does business and as such are prohibited by The Hartford. Any employee who has been requested to make a facilitation payment should immediately contact the Chief Ethics & Compliance Officer.











According to anti-bribery and anti-corruption regulations, what is a bribe?

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АР	KIL	9	UU	UL	ע	DE



- Gifts • Use of facilities, services or transportation
- Insurance benefits Commissions
- Offers of employment Property
- Stock or stock options · Cash or cash equivalents
- Use of materials or equipment







Q-A ETHICAL DILEMMAS

Q: I would like to take some business partners out to dinner and a play, but I am not sure whether the company they work for is owned or controlled by a foreign government. What should I do?

A: Contact your Compliance Officer for guidance before you schedule any outings. It is very important to be sure you know who you are dealing with so you know what you can and cannot do.











SUSTAIN OUR BUSINESS

As a company in business for more than 200 years, we understand what it means to be sustainable. Building on our proud history of doing the right thing, The Hartford's sustainability strategy is built around measurable goals intended to both create long-term shareholder value and contribute positively to society at large. We match our commitment with results, as evidenced by our inclusion in the Dow Jones Sustainability Index every year since 2012.

In this section, you will learn about The Hartford's commitment to sustainability including economic, environmental and social impacts.

Read The Hartford's Sustainability Highlight Report to learn more about how we continue to make an impact for good or visit our Corporate Sustainability website.

LEARN MORE















Environmental Stewardship

As an insurance company, we understand the risks that environmental challenges present to people and communities. As stewards of the environment, we are committed to mitigating climate change and reducing our carbon footprint incrementally each year, demonstrated through a variety of actions and recognitions including:

- In 2020, The Hartford was recognized by CDP for the 12th time.
- The Hartford has reduced our greenhouse gas emissions by 66% since 2007. The Hartford has set a goal to further reduce our carbon footprint by at least 2.1% each year, resulting in an additional decrease of at least 46.2% by 2037.
- The Hartford was awarded two Climate Leadership Awards in 2018 for Excellence in Greenhouse Gas Management - Goal Setting and Goal Achievement.
- The Hartford's Environmental Action Team (HEAT) continues to grow, with more than 950 employees participating from across the enterprise.
- The Hartford ranked #37 on the Green Power Partnership Fortune 500 Partners List.
- 50% of The Hartford's total energy consumption came from renewable energy sources in 2019.

Communities & Giving

We help individuals and neighborhoods prevail by building safe, strong and successful communities through targeted philanthropic investments, by partnering with like-minded national and local organizations, and by harnessing the power of our workforce to engage in their communities.

The Hartford's employees exhibit exceptional character every day, embracing the opportunity to give their time, talent and generosity in support of the communities where they live and work. To encourage, recognize and reward these efforts, The Hartford offers employees who volunteer in their communities several benefits. These include:

- Up to 8 hours of paid time off annually to volunteer
- Dollars for Doers directed to a charity of the employee's choice
- Other wellness program benefits

In addition to benefits for volunteering, The Hartford also offers a Matching Gifts program that extends the reach of employee donations made to eligible 501(c)(3) organizations.











Diversity & Inclusion

We are committed to building an inclusive and engaging culture, where people are respected for who they are, recognized for how they contribute and celebrated for growth and exceptional performance. We value the diversity of our employees' skills and life experiences and invest deeply in their development so they can deliver on our strategy and propel our company forward.

There are 9 Employee Resource Groups (ERG's) currently available, offering employees a forum to share unique perspectives on a variety of topics and helping to influence and improve our workplaces, businesses and communities. More than 46% of employees are currently members of at least one of the following ERG's:

- · Asian Pacific Professionals Network
- Black Insurance Professionals Network
- Flex-Abilities Network
- · Hispanic Leadership Network
- Mature Professionals Network
- · Military Community Network
- PRIDE Network
- Professional Women's Network
- Young Professionals Network

Learn more about the ERG's available at The Hartford.



The Hartford is consistently recognized for our inclusive culture and for providing a workplace that meets the unique needs of our employees. For example:

- Highest ranked property-casualty insurance company in Forbes' annual list of America's Best Employers for Diversity
- Named "A Best Place to Work for LGBTQ Equality" for the 11th year, receiving a perfect score on the Corporate Equality Index from the Human Rights Campaign Foundation
- Bloomberg Gender Equality Index for the 5th consecutive year
- Named a "Best Places to Work" from the 100% Disability Equality Index (DEI) Diversity Best Practices Index Company

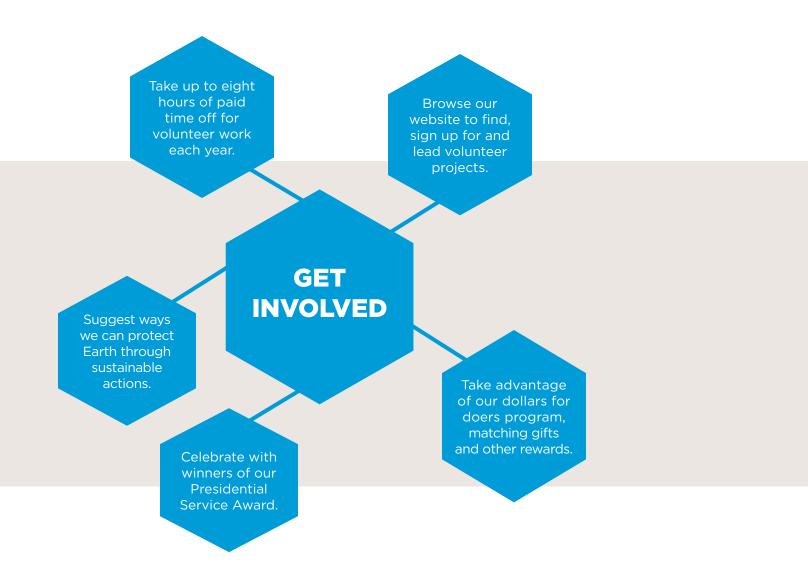








How can you get involved?











COMPETE FAIRLY

Excellence in global competition means more than just winning customers - it means winning fairly, ethically and legally. Our success and reputation depend on our compliance with many rules impacting our day-to-day interactions with customers, partners and competitors.

In this section you will learn about:

- Fair competition and quotes
- · Competitive intelligence gathering
- Global trade
- · Anti-money laundering
- Antitrust measures

LEARN MORE















ETHICS IN ACTION

To maintain ethical standards while competing globally requires knowing and abiding by the rules of fair play, and being alert to warning signs of improper practices by others.

Fair Competition and Quotes

We must be truthful and never misrepresent the facts about the benefits, advantages, conditions or terms of our products and services. Any recommendation for an insurance product or service should properly suit the customer's known circumstances, insurance objectives and financial situation.

All quotes should be accurate, and all sales and marketing materials should be honest and complete. Your quotes:

- Must be underwritten for each insurance risk and priced on their own merits
- · May state a good faith estimate of the premium as non-binding and subject to further review
- Must be delivered in writing if final (or electronically where appropriate), and clearly specify all required terms and conditions

Do not improperly obtain and/or use another's trade secrets or other confidential or proprietary information. Unfair practices not only damage trust in you and The Hartford, they may violate the law and lead to civil and criminal penalties.

Gathering Competitive Intelligence

When gathering competitive information, always be truthful about who you are and where you work to obtain the information honestly and with integrity. Never compromise our values or the

law by inappropriately obtaining or misusing the confidential information of others, or by using improper means such as theft, blackmail, bribery, wiretapping, eavesdropping or violation of non-disclosure agreements to collect competitive intelligence.

Global Trade

Global trade sanctions prevent us from doing business with certain countries, entities and persons. To prevent prohibited transactions, we do daily scans of customer names, vendors, and payments against U.S. and foreign government lists of countries and parties under trade or economic sanctions. The scanning procedures are performed on our various administrative, premium and claim payment processing systems. You must follow your department's procedures for referring applications, policies or claims to Sanctions Compliance for review prior to completing the transaction.

Anti-Money Laundering

Always be alert to warning signs of money laundering, terrorist financing and other financial crimes. Indicators include:

- Purchase of unnecessary insurance products
- Unusual payment methods such as cash multiples
- Transfer of benefit of a product to an unrelated third party
- · Lack of concern for investment performance
- Unusual interest in early termination features of a product
- Reluctance to provide identifying information
- · Borrowing of maximum amount under a product soon after purchase







If you know your customer well, then you will know your customer's identity, sources of funds, anticipated account activity, and actual account behaviors, so you can easily spot anything out of the ordinary.

Antitrust Measures

We strictly prohibit any attempt to gain an advantage through improper agreements with competitors, price-fixing or other unlawful practices. When dealing with competitors:

- Never fix prices, terms or conditions of insurance or services.
- Never divide markets or allocate customers or territories among competitors.
- Never agree to boycott a vendor or customer in any market.
- Never require a customer to use a product or service on an exclusive basis without first discussing it with the Law Department.

Always report immediately any unethical or questionable request by any agent, broker or other distribution partner.









DECISION AID

When you make quotes for our products and services, remember to be truthful and offer the most appropriate product or service for the customer's needs. Use the Quote Decision Aid to help you make honest, ethical quotes.

WHEN MAKING QUOTES:

Never unlawfully discriminate on the basis of people's differences.

Don't be deceptive or misleading about the benefits, advantages, terms or conditions.

Don't use false statements or misrepresentations about competitors or their products and services.

Never use a competitor's trade secrets or other confidential or proprietary information.

Don't mislead a customer about the true range of available options.

Don't make quotes that we know are inappropriate for a customer's circumstances. objectives and financial situation.

Never base a quote on assurances that the quote will not be selected.

Do not revise a quote without a legitimate business purpose and proper documentation.







QA ETHICAL DILEMMAS

Q: What should I know about my customers to be able to spot potential money laundering or other financial crimes?

A: Ask the questions necessary for the customer type to establish clear expectations for that customer's investment strategy, future activities and transactions, and source of funds, including from employment and investments. Monitor the account for unusual activities that do not fit or make good business sense.











MAKE ACCURATE REPORTS

Our commitment to excellence and integrity are reflected in the reports we prepare for internal and external uses. Any report you make reveals within it your attention to detail, desire for accuracy and adherence to policies.

In this section you will learn how to handle:

- Financial reports
- External requests for information

LEARN MORE













Whether we are making an internal report or an external report of business information, we must be truthful and clear.

Financial & Business Reports

Our shareholders, business partners, regulators and the public rely on us to make accurate, timely reports of financial information. Reports may be in electronic, paper or other form, but all versions should be precise and easily understood.

Never allow or facilitate the creation of undisclosed or unrecorded funds for any purpose, and never place any company funds in a personal or non-corporate account. Do not attempt to influence, coerce, mislead or interfere with the accurate preparation and auditing of financial statements. Immediately report any concerns regarding the integrity of financial reports.

You should keep honest, accurate and complete records of all business-related transactions. Never misrepresent facts or falsify information on expense reports, and seek reimbursement only for actual, reasonable and authorized business expenses.

External Requests for Information

You should immediately refer all requests from news media for interviews, comments or information on behalf of The Hartford to Media Relations.

You should immediately refer all requests from analysts and investors for financial information about The Hartford to the Investor Relations Department.



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Whenever you get requests for information from news media, analysts or investors, it is very important that you refer them to the correct department.

EXTERNAL REQUESTS FOR INFORMATION

Requests from news media for interviews, comments or information on behalf of The Hartford

> Refer to External **Communications Department**

Requests from analysts or investors for financial information about The Hartford

> Refer to Investor Relations **Department**







EMPLOYMENT AT WILL

Our Code of Ethics and Business Conduct and policies are not an employment contract. You should not consider anything in the Code or policies as a promise of any kind or as creating a contract regarding wages or any other terms or conditions of employment. Subject to any employment agreement, employment is "at will," meaning an employee or The Hartford can terminate the relationship at any time, for any legal reason, without notice or cause

ANNUAL CERTIFICATION REQUIREMENTS

We all share a commitment to our values and aim for continual improvement. For that reason, we all agree to certify annually that we have read the Code and fully understand our responsibilities.

New employees will receive training on the Code as part of orientation. You will receive additional training whenever the Code is significantly revised. If you are a manager, you should ensure that all employees under your supervision complete any required training.

Because the Code is a series of ongoing obligations that we may update throughout the year, employees should periodically review the Code to refresh their understanding of key provisions and stay current on any modifications.

WAIVERS OR EXCEPTIONS

The Code is fundamental to sustaining trust in everything we do. That is why we rarely grant waivers or exceptions. You should make any request for a waiver or exception before you act.

Any waivers for Executive Officers require approval by our Board of Directors, or an independent committee of the Board, and will be promptly disclosed.

INTERPRETATION, POLICIES, UPDATES AND MODIFICATION

The Code references many of our policies. All of our policies are available on iConnect. Because of the changing nature of our regulatory environment, The Hartford must be able to change the Code and our policies at any time, without advance notice.

Although the Code and policies may change over time, our shared values will continue to guide our decisions. We always strive to act with integrity and honesty and be accountable in everything we do. Only The Hartford has the right to administer and interpret Code provisions and policies.

PROTECTED ACTIVITIES

Various laws protect the rights of employees to engage in various activities, even though they might not support the interests of their employer. For example, some laws may protect an employee's right to speak out publicly about matters of public concern or engage in certain activities relating to the terms and conditions of employment. Nothing in this Code or in any company policy is intended to limit or interfere with an employee's right to engage in these protected activities, including an employee's right to engage in concerted action under Section 7 of the National Labor Relations Act, and nothing in this Code or any company policy should be construed to do so.

Nothing in this Code prohibits you from reporting possible violations of federal law or regulation to any governmental agency or entity, including but not limited to the Department of Justice, the Securities and Exchange Commission, the Congress, and any agency Inspector General, or making other disclosures that are protected under the whistleblower provisions of federal law or regulation. You do not need to have prior authorization to make any such reports or disclosures and you are not required to notify the company that you have made such reports or disclosures.



MORE INFORMATION

For more information consult the following sources:

Anti-Bribery and Corruption (ABC) Policy

Antitrust Compliance Guidelines

Brand Central

Corporate Sustainability

Customer Privacy Notice

Economic Sanctions Policy

Ethics and Compliance Policies

Information Protection Policies

Intellectual Property Law

International Customer and Third Party Privacy Notice

<u>iProtect</u>

Media Relations Policy

Privacy Law

Quote Guiding Principles GBD

Quote Guiding Principles P&C

Retaliation-Free Workplace Policy

Records Management

SEC Attorney Conduct Rules

Social Media Central

Travel and Entertainment Resource Center

You should also consult your local HR policies for additional information. HR policy's for employees based in the United States can be found here:

HR Online

Compliance policies relevant to all International Employees can be found here. It is mandatory that the policies are read by all employees, at least annually.

UK Policies and Procedures









Anti-Money Laundering Antitrust

Assets, Use and Return of

B

Boards, Service on Bribery Bullying and Abusive Conduct

Company Vehicles Competition, Fair

Competition, Global

Competitive Intelligence

Conflicts of Interest

Contact with Investors and Analysts

Contact with News Media

Criminal Convictions

Customer Privacy

Drugs and Alcohol

Electronic Communication

Endorsements

Enforcement

Equal Employment Opportunity

EthicsPoint

Expense Reports

Expert, Serving as an

FCPA

Financial Reports

G

Gifts and Entertainment

- Generally
- For Claim Employees
- For Hartford Funds Employees

Government Relationships

Harassment, Discrimination Hiring

Information Security Intellectual Property Insider Trading

Legal Holds Loans

Lobbying

Managers, Role of

Outside Employment

Pay-to-Play

Personal Relationships

Political Activities

Practice of Law

Privacy

Protected Activities

Quotes

Records Retention Report Concerns

Respect Others

Retaliation

Safety and Threats Social Media

Stocks, Trading

Sustainability

Terrorism, Combating Trade Sanctions

Volunteer Activities

Lori Rodden







ENTERPRISE COMPLIANCE			
Charlene Ridgeway	Chief Ethics & Compliance Officer	860-547-3740	
Compliance Officer Contacts:			
Shane McCann	Group Benefits	860-547-4306	
<u>Tim Brennan</u>	HIMCO	860-297-6456	
Joe Melcher	Mutual Funds	610-386-1801	
Susan Castaneda	Property & Casualty, Operations, Technology, and Innovation	860-547-8330	
Maria Fazzino	HR, Economic Sanctions, Anti-Bribery & Corruption and SSRE	860-547-8592	
Stephanie Raymond	Claims	860-547-8211	
Simon French	International Compliance	UK 020-7220-6984	
ETHICSPOINT			
(toll-free in the U.S. or Canada)		866-737-6812	
(toll-free in all other countries)		866-737-6850	
www.EthicsPoint.com			
LIIIMAN DECOUDES			
HUMAN RESOURCES			
Ombudsman	(For general HR advice, NOT for reporting compliance concerns)	800-289-5012	
The HR Service Center		877-HR-AT-WORK/877-472-8967	

860-547-8077

Human Resources







LAW/INTERNAL AUDIT/CORPORATE RISK MANAGEMENT			
Timothy Barry	Special Investigations	860-547-6095	
Joel Townsend	Litigation	860-547-3849	
Mike Hession	General Auditor	860-547-8504	
Donald C. Hunt	Corporate Law	860-547-5040	
Geoff Perkins	Corporate Risk Management	860-520-2227	
David C. Robinson	General Counsel	860-547-2774	
Thomas Bartell	Government Affairs	860-547-3687	
Mary Cardin	Privacy Law	860-547-8772	

MARKETING AND COMMUNICATIONS			
Media Relations Hotline		860-547-5200	
Matthew Sturdevant	Media Relations	860-547-8664	
Paula Angelo	Corporate Communications	860-547-2768	
Susan Spivak Bernstein	Investor Relations	860-547-6233	

SECURITY/INFORMATION PROTECTION				
Security		877-55B-SAFE		
Information Security Officer		860-547-6095		
Infrastructure Solutions Department		855-8WE-HELP/855-8893-4357		
Tim Carling	The Hartford Information Protection	860-547-6479		
	Security	860-547-5705		