

Code of Ethics and Business Conduct

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Interactive features

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Ask a Question, Raise a Concern →

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For more than two centuries, dedicated employees like you have been the cornerstone of The Hartford's success. Your unwavering commitment to honesty and integrity has built lasting relationships with our customers and driven our successful performance.

Our employee surveys show that nearly all our employees recognize The Hartford is committed to ethical business decisions and conduct. We can take pride in the fact that our results far exceed the top 25 percent of global companies and that we are part of an organization that values ethical behavior and business practices.

Our stakeholders - customers, partners, investors, employees, communities, and regulators - know they can count on us to uphold the highest standards of ethics and compliance, and this has been validated by Ethisphere, who has named The Hartford as one of the World's Most Ethical Companies® 16 times.

Let's continue to be recognized as a company that goes well beyond making statements about doing business ethically and keep committing those words into actions. The Hartford's Code of Ethics and Business Conduct provides practical guidance on the company's behaviors and offers support when the course of action is unclear.

Thank you for your dedication to ethical business practices and for upholding our reputation for integrity.

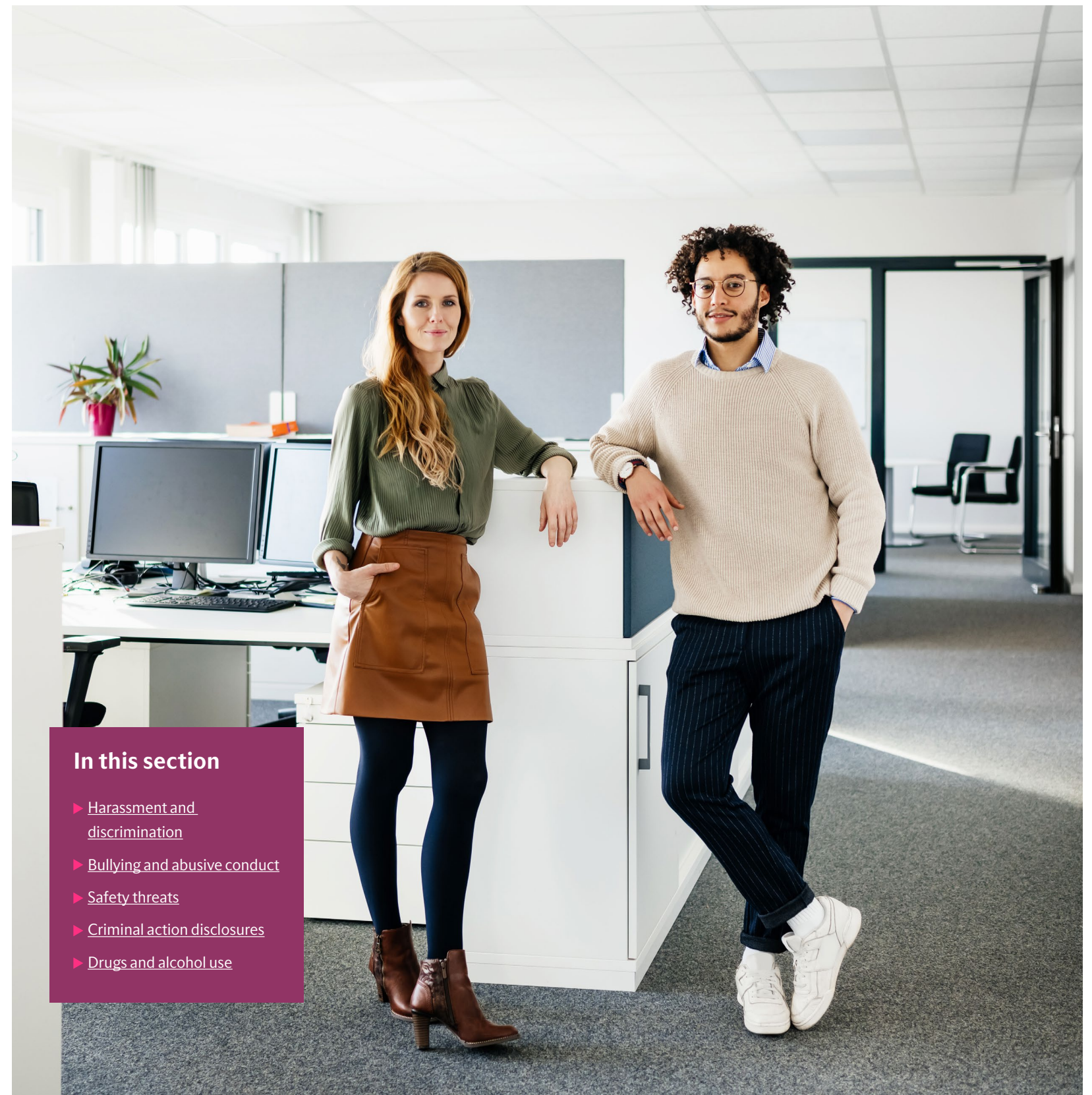
Regards,
Christopher J. Swift





Living the Code

Our Code of Ethics and Business Conduct is a resource document to guide employees, including officers and managers, on how to make good decisions and conduct business ethically. The Code addresses specific topics and provides directions for employees on how to handle common situations, where to go for consulting and when to report issues. Employees must consult the Code and hold themselves accountable to the standards within it. By doing the right thing, employees foster a culture of compliance and make The Hartford a top workplace.



In this section

- ▶ [Harassment and discrimination](#)
- ▶ [Bullying and abusive conduct](#)
- ▶ [Safety threats](#)
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Annual Certification Requirements

As a company, we share a commitment to our values and aim for continual improvement. All employees must certify annually that they have read the Code and fully understand their responsibilities.

New employees will receive training on the Code as part of their onboarding to the Company. After that, employees will receive additional training whenever the Code is significantly revised.

Due to the Code being a series of ongoing obligations that may be updated throughout the year, employees are expected to periodically review the Code to refresh their understanding of key provisions and stay current on any modifications.

Role Responsibilities

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 and misrepresentation of system data.

Respecting Others

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. 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.

“The Hartford’s culture of integrity is foundational to our success and strong reputation. Our ethical principles and mature compliance programs guide employee behavior and influence our strategies, customer interactions, employee experience and community engagement. Every employee, at all levels of the organization, has leadership accountability to maintain the highest standard of our culture.”

Karmela Malone,
Chief Ethics and Compliance Officer (CECO)



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.



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's very important to treat others at work with respect, and to report any behavior that seems bullying and abusive.



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 cellphone usage. To the extent the law permits you to use a cellphone while driving, you must use a hands-free device with voice-activated dialing features.

Criminal Action Disclosures


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.



Drugs and Alcohol Use

Employees are not allowed to use alcohol, illegal drugs or other substances that impair their ability to perform their job at work. 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.

 Immediately **Speak Up!** and report without fear of retaliation, if you are the target of, or are a bystander (“witness”) to any form of harassment, discrimination, bullying, abusive or unsafe conduct against another employee or colleague, 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.



Speak Up

Our company takes employee concerns seriously. It’s one way we consciously create and protect our culture. **Sharing concerns about compliance with our Code, policies or the law is not optional but rather an obligation of everyone at The Hartford.** **If something doesn’t seem right, please report it.**



- In this section**
- ▶ [Ways to share concerns](#)
 - ▶ [Frequently asked questions](#)

Disclaimers and Resources	Manager Support	Sustainability Practices	Ethically engage for Business	Protecting company information	Gifts and entertainment	Conflict of interest	Speak up	Living the Code
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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:

Hotlines

- Call the Fraud Reporting Hotline: **800-547-9276 (WARN)**.
- Use the Ombudsperson: **800-289-5012**. (The Ombudsperson is available to assist employees by providing guidance but is not a channel that puts the company on notice of a report.)
- File a complaint using EthicsPoint by phone: **866-737-6812**.

Online



- File a complaint using EthicsPoint via their online reporting service or scan the QR code to report it via a mobile device. The reporter can choose to remain anonymous.
- Submit to [Employee Relations](#) via the request [form](#).



Additional ways

- Talk to a manager, they can be a good place to start, if appropriate.
- Contact [Employee Relations](#).
- Contact your [Compliance Officer](#).
- Contact [Karmela Malone](#), Chief Ethics and Compliance Officer.

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

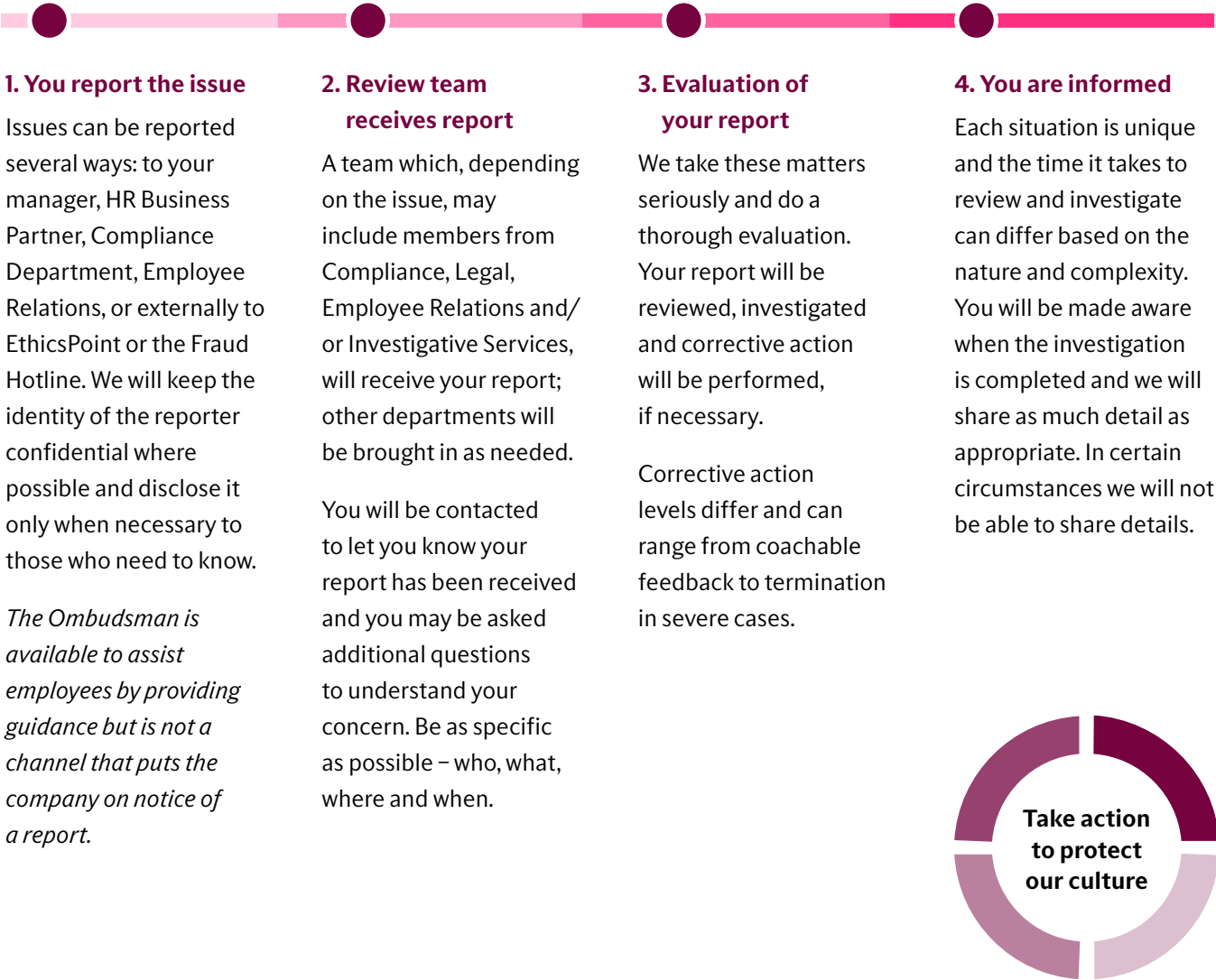
Attorneys at The Hartford must report any Code violations in accordance with our SEC Attorney Conduct Rules. These rules describe how to comply with the reporting requirements of Section 307 of the Sarbanes-Oxley Act. Any questions should be addressed to Terence Shields.



If you’re an employee living in the **United Kingdom**, you may also report pursuant to the [International Whistleblower Policy](#)



What happens when I report something?



Frequently Asked Questions

Will I be protected if I report something?

All reports of compliance concerns should only be made in good faith, meaning you honestly believe that your report is truthful.

During an investigation, whether internal or external, you must be truthful and cooperate fully, or you could face potential disciplinary action up to and including termination.

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. All employees have access to the [Retaliation-Free Workplace Policy](#).

Can I remain anonymous when reporting something?

If you report through EthicsPoint, you will have the option of remaining anonymous. The other reporting channels do not ensure anonymity.

How does EthicsPoint work?

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.

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

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.



Conflicts of Interest

As employees of The Hartford, we all have an obligation to act and make decisions that are in line with the company's best interests. A conflict between your interests, actions and behaviors, and The Hartford's best interests can cause serious damage if unmanaged. Even the appearance of a conflict of interest can be harmful. That is why it is important to recognize, avoid and promptly disclose any potential or perceived conflict of interest to manage and mitigate the risk it may create for The Hartford.

In this section

- ▶ [What is a conflict of interest?](#)
- ▶ [Personal relationship conflicts of interest](#)
- ▶ [Board of director conflicts of interest](#)
- ▶ [Financial conflicts of interest](#)
- ▶ [Political activities conflicts of interest](#)
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What is a conflict of interest?

A conflict of interest is when your personal interests (such as personal relationships, financial benefits or social factors) may compromise, influence or appear to influence your professional actions or the decisions you make on behalf of The Hartford.

Conflicts of interest could either be actual, potential or perceived. All forms need to be disclosed to your manager and Compliance Officer. With conflicts of interest, perception is as important as reality. Even an appearance that an employee's personal interests conflict with what is best for The Hartford may cause reputational harm. This is where disclosure becomes critical. Disclosing potential conflicts of interest creates transparency of personal interests and may help eliminate a perception of unfair or unethical behavior.

Conflicts of interest could either be actual, potential or perceived.

Actual Conflict	Potential Conflict	Perceived Conflict
You are being influenced. The conflict is ongoing and impacting your professional conduct.	You could be influenced. The conflict is not impacting your professional conduct presently but eventually could.	You may appear to be influenced. The conflict may or may not impact you directly but could appear to exist to other third parties (customers, employees, vendors, etc.).



Common Conflicts of Interest

There is no one size fits all approach to conflicts of interest. People have diverse backgrounds and interests and likewise the activities they engage in also vary. Our experience indicates conflicts commonly arise from:

- Personal relationships
- Additional employment
- Political activities
- Investments



Personal Relationships Conflicts of Interest

Direct Report or Management Conflict

People with close personal relationships 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.

External Relationships

A conflict of interest may exist if your relationship with a person outside of The Hartford influences (or appears to influence) your professional actions or the decisions you make on behalf of The Hartford.

For example, a sales representative from The Hartford covers a territory which includes an agency owned by their family member. Because of the personal relationship, the sales representative might agree to write accounts that The Hartford typically wouldn't consider – increasing the company's exposure to financial risk.



HIMCO Access Persons must disclose all outside employment to HIMCO Compliance.

Another example includes an employee contracting with a vendor managed by their family member instead of the vendor offering The Hartford the most competitive price or service offering or underwriting/claim decisions which are influenced by personal relationships.

Questions to Ask Yourself:

- ❓ Could it influence any of the decisions I make or work I do on behalf of The Hartford?
- ❓ Does it create a benefit to me or someone I have a personal relationship with?



Additional Employment Conflicts of Interest

If you wish to engage in additional employment, outside of your role with The Hartford, there could be a conflict of interest. Your manager and Compliance Officer need to provide prior approval 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 in a case.
- 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.

Note: 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

Approval Needed

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.

Expected Conduct

As you carry out your outside board duties, always remember to excuse yourself from participating in any discussions or decisions that could 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.

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.

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 personally 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.



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.

Questions to Ask Yourself:

Do I or any members of my household related by blood or marriage including extended family such as parents, step-parents, siblings, in-laws or children have any significant financial interest in a competitor or business partner of The Hartford or an organization or activity affected by my actions with The Hartford?

- ✓ **If yes**, is it a significant financial interest (the total fair market value exceeds your annual base salary or 5% of your net worth (whichever is less) or 5% ownership interest?
- ✓ **If yes**, 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.

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.



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 appearance 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 and Industry Relations Group](#).

Any non-partisan political expenditures are publicly reported, updated quarterly and approved in advance by the Chief Executive Officer, the General Counsel and the Chief Government Relations Officer. This activity is also reported annually to the Nominating and Corporate Governance Committee of The Hartford's Board of Directors.

Additional information about The Hartford's political activities is available [here](#).



Disclosure of Conflicts of Interest

All employees have an obligation to immediately [report](#) any actual, potential or perceived conflict of interest to their manager or Compliance Officer. Refer to the [common case study examples](#) for further guidance.

There are potential consequences to unmanaged conflicts of interest including:

- Improper business decisions
- Trust issues
- Company reputation
- Financial impacts

Reporting possible conflicts of interest is important in order to establish a plan to properly mitigate risk for The Hartford and yourself.

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.



HIMCO employees should report in the HIMCO Personal Trading Application.



Despite needing to report conflicts, they are not always negative such as sitting on the board of a nonprofit organization.



Avoid situations, when possible, that lead to potential conflicts of interest.

Ask yourself appropriate questions to determine if a conflict of interest may exist.

Report any actual, potential or perceived conflict of interest to your manager or Compliance Officer.



Don't be afraid to disclose any possible conflicts of interest.

Don't put the company in a position where the conflict remains unknown and mitigation steps are not taken.

Don't engage in behavior that goes against the Code or company policies.



Potential Conflicts of Interest With the Use of Social Media

Think about potential conflicts of interest whenever you use social media as well. Remember to follow the [Social Media Policy](#) as guidance for conduct expectations when using social media.



Consider being a brand advocate and access Hartshares to share approved content about The Hartford.

Use #iworkforthehartford to disclose your connection to The Hartford.

Follow the terms and conditions for each social media site.

Understand that The Hartford does not prohibit you from:

- Discussing terms and conditions of our employment, such as wages, hours or working conditions.
- Speaking to the media on your behalf.



Don't present yourself as representing The Hartford in any way unless you have the appropriate permission. If you are not appointed as a Designated Spokesperson by Media Relations, do not respond to the media on behalf of The Hartford.

Don't use any trademarks or logos of The Hartford for any purpose, including for establishing social media accounts, pages or profiles, unless you have been authorized by Marketing & Communications to do so.

Don't post information or recommendations on products, unless you are an authorized representative or agent.



International Employees

The International Conflicts of Interest applies to The Hartford's International Division of Global Specialty ("International"), which comprises:

- Hartford Underwriting Agency Limited ("HUAL")
- UK Branch of Navigators Insurance Company ("UK Branch")
- All subsidiaries, Appointed Representatives, Service Companies and branches of the above entities

References to the Board of Directors for International refers to the Board of HUAL or the Executive Committee of the UK Branch as applicable.

This covers the conflicts of interest that could exist in relation to International and its:

- Directors, senior management and employees (defined throughout this Policy as "Employee")
- Family and household members of Employees
- Brokers, competitors, insureds and suppliers (defined throughout this Policy as "Customer")

Under the Financial Conduct Authority's ("FCA") Principles for Business, International "must manage conflicts of interest fairly, both between itself and its customers and between a customer and another client."



External Employment

Employees may not hold outside employment that interferes or creates a conflict of interest with their job performance at International.

Dealing with Brokers

Broker remuneration must not be designed in a way to induce conflicts with a broker whereby the broker’s own interests are put above those of their customers. This includes any payments to brokers for services or profit-sharing arrangements for example. All such arrangements can only be entered into in accordance with International’s Broker Remuneration Policy. All profit commissions payable on lineslip arrangements must be reported to the Delegated Authority function.



Dealing with Coverholders and Third-Party Administrators

Where International enter into an agreement to delegate underwriting and/or claims authority to a coverholder or Third-Party Administrator (both defined as “Third Party”), it is essential that potential conflicts are not only identified but are also managed effectively. Examples of potential conflicts include:

- Where the Third-Party acts as both broker (agent of the insured) and underwriter (agent of International) and there is not a clear separation of duties between those individuals acting as a broker and underwriter;
- Where the Third Party has both underwriting and claims authority and there is not a clear separation of duties between those individuals acting as an underwriter and claims handler;
- Where the Third Party has underwriting and claims authority, and receives a profit commission;
- Where the Third-Party acts as claims handler and loss adjuster;
- Where the Third-Party has claims authority and complaints handling authority;
- Where the Third-Party has claims authority and claims declinature authority.

Where a conflict of interest has been identified and The Hartford determines that it should not stop any potential proposed business activity, managing the conflict is essential in ensuring that it does not impinge any decisions made by staff when conducting their duties. Where this is the case, it would be prudent for another staff member to take ownership of a work stream to ensure the individual with the potential conflict is not involved with it. For example, a different underwriter looking at a line of business being introduced where that underwriter has a link to the firm or individual introducing the business to The Hartford.

Remuneration paid to a Third-Party, by International, must not be structured in such a way that could lead to unfair outcomes for International’s Customers, e.g., remuneration paid to a Third Party, which has both underwriting and claims authority, which is solely based on low claims ratios, the number of claims rejected or any reduction in claims value obtained.

Occasionally, the business may be faced with a conflict of interest where there is a claim involving two or more separate insureds. Should this occur, the Head of Claims will invoke an ‘ethical wall.’ Separate people will be nominated to handle the interests of each insured and strict confidentiality is applied to ensure no insured is prejudiced by the potential conflict.



Common Case Study Examples

I have been asked to participate on a Board.

Congratulations! Report this to your manager or Compliance Officer and be prepared to answer such questions as:

Will you be paid for this position?

Do you understand and agree that your participation on the board is in your individual capacity and not as an employee or representative of The Hartford?

I am an underwriter and someone in my family is a broker in my territory.

This is a reportable conflict of interest. Your manager should be made aware and it should be reported to Compliance so proper controls and mitigations can be established.

I would like to get a second job, is this acceptable?

Additional employment may be a conflict of interest depending on the industry so you should report this to your manager and Compliance. We will want to understand the details such as:

What industry, what activities you will perform, the time commitment, if it is insurance – will you be engaging with similar products and/or intend on soliciting customers or employees, etc. of The Hartford.



Gifts and Entertainment

Offering and accepting gifts and entertainment with a customer or business partner can be a normal gesture that showcases goodwill while possibly improving business relationships.

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

Prior to giving or receiving we must ensure the gesture is appropriate and in line with our culture and policies. **Any gift or entertainment that involves a conflict of interest, including any appearance of an improper attempt to influence business decisions, is not acceptable.**

In this section

- ▶ [Acceptable gifts and entertainment](#)
- ▶ [Unacceptable gifts and entertainment](#)
- ▶ [Common case studies](#)

There are department specific rules for **Claims, Hartford Funds, HIMCO** and **International**. Refer to those in the following section:

- ▶ [Special handling for certain departments](#)





How to Navigate Gifts and Entertainment

Gifts and entertainment are acceptable when:

- There is no favored treatment or expectations connected with receiving the gift.
- The gift is modest and reasonable.
- The entertainment has a business-related purpose and does not exceed \$250 or £200 per person.

Gifts and entertainment are unacceptable when:

- Cash or cash equivalent.
- Favored treatment: Improper business advantage or influence.
- Non-professional (unethical, goes against company values).
- Non-compliant (violations of law, regulation and/or company policy).
- It involves a government official.
- Entertainment offers where the giver is not attending and the value exceeds \$100 or £200.

Kindly say no thank you.

If someone has presented you with a gift or entertainment opportunity that is unacceptable, saying no can be hard; you don't want to seem unappreciative or rude. Refrain from using words like "Compliance won't let me accept" and instead provide an explanation to back up your "no thank you."

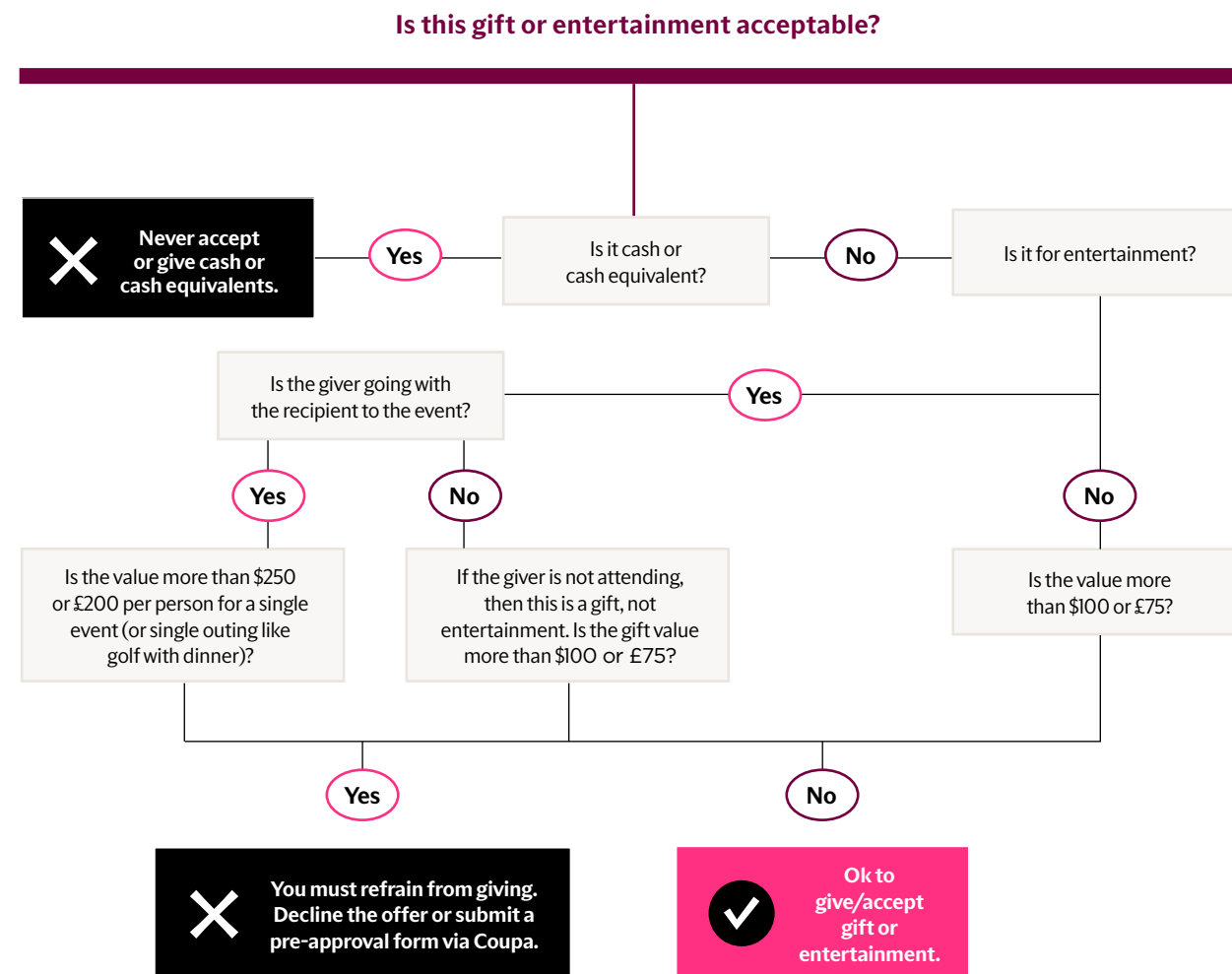


Consider the following proper ways to decline their offer:

- ✓ "I appreciate your offer but must decline as I don't want to give the appearance of a conflict of interest."
- ✓ "I appreciate your generous offer but must decline as the value is too great and I don't want others to think it could influence my business decisions."



Still unsure if the gift or entertainment is acceptable or requires approval, follow the decision tree.



Common Case Study Examples

I have been offered tickets to a show from a business partner, but the partner is not attending with me. Is it considered a gift or entertainment?

Because the partner is not attending the event with you it would be considered a gift and the \$100 or £75 limit applies. If the partner were attending, it would be considered entertainment and the \$250 or £200 per person limit would apply.

I work in Sales and I want to take some agents golfing followed by dinner. Do I have to add the value of both activities together to determine if it is within the per person limit?

Yes, it would be considered a single event and both the value of the golf and dinner should be added together to calculate the per person value.

I am a Claims adjuster and a holiday gift basket worth \$50 or £38 was sent to my home from a vendor, can I accept it?

No, Claims employees may only accept gifts of a nominal value such as a branded coffee mug or baseball hat with a vendor's logo.



Special Handling for Certain Departments

All Claim Employees including International

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.

Gifts

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 returned.

Entertainment

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 \$150 or £200 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.



If you have any doubts, prioritize caution. Consult with and seek approval from your manager, followed by the Chief Risk and Compliance Officer.

Hartford Funds and HIMCO Employees Gifts and Entertainment

Contact your Compliance Officer prior to engaging in gifts or entertainment activities.

International Employees Gifts and Entertainment Limits

International employees are prohibited from accepting or giving of gifts or entertainment with any governmental official, including representatives of a government-owned or controlled business, unless prior approval has been granted by the Chief Risk and Compliance Officer.

International employees may not use their position 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 International through contractual or published agreements or are consistent with standard pricing offered by the vendor to the public.

If the nature of the conflict identified involves gifts or entertainment, provide details of the value when the following is exceeded.

- Gifts, both received and offered, with a value **greater than £75**;
- Entertainment, both received and offered, with a value **greater than £200 per person.***

In both above circumstances, approval by line manager and Chief Risk and Compliance Officer is required.

*Or the local equivalent when converted to GBP on the day that the gift or entertainment is received or given.



Protecting Company Information

Our customers, employees and business partners entrust us with personal and confidential information, and we each play a critical role in protecting that information. We all must ensure that confidential information and Hartford property are always properly secured, whether at the office, working from home or working remotely, including traveling on business. **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

- ▶ [Information security](#)
- ▶ [Customer and employee privacy](#)
- ▶ [Intellectual property](#)
- ▶ [Other company assets](#)
- ▶ [Material nonpublic information](#)
- ▶ [Inside information](#)
- ▶ [Records management and suspension holds](#)
- ▶ [Reporting accuracy](#)





Information Security

The cybersecurity landscape is rapidly evolving with new and emerging threats and our cybersecurity teams are proactively monitoring our environment, adapting our defenses and implementing new capabilities. The consequences of a data breach can be severe, which is why we have an entire intranet site, [iProtect](#) dedicated to our standards, policies and procedures for information protection.

There are many common causes of data breaches (e.g., loss or theft of portable devices such as laptops, smartphones and flash drives). One of the most common causes is phishing emails, where scammers attempt to manipulate people into disclosing confidential or sensitive information so the scammer can use it to commit fraud or obtain access to The Hartford's systems. All suspicious emails must be sent to anti-phish@thehartford.com by selecting the Report Phish/Spam button in Outlook.

Use extra care 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.

Potential data loss, theft and exposure are constant risks for our company. The Hartford relies on any employees who become aware of a data incident to immediately self-report via the [myTechExpress \(MTE\) Portal](#) or contacting the Help Desk (855-893-4357) if they do not have immediate computer access.



Examples of security incidents:

- Computing device loss or theft
- Systems break-ins
- Virus attacks
- Software tampering

Examples of data incidents:

- Data sent to unintended recipients (via email, paper mail or fax)
- Unauthorized access to data by an employee or vendors
- Loss and/or theft of paper data
- Data tampering
- Improper document/media disposal



Customer and Employee Privacy

The nature of our business requires that we collect confidential and personal information to manage our business and service our customers. We understand the importance of safeguarding and protecting the information entrusted to us by our customers, employees and third parties.

The Hartford's company confidential information has to be classified properly and marked confidential and cannot 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.

Ethics in Action

Scenario	What should I do?
A claimant requested I send her a copy of her claim file and I accidentally emailed it to the wrong claimant.	You should immediately report this as a data incident by submitting a ticket in myTechExpress (MTE) portal or by calling 855-8WE-HELP/855-893-4357 so it can be mitigated.
A policyholder called the contact center to report that she received another person's policy documents in her envelope.	You should immediately report this as a data incident by submitting a ticket in myTechExpress (MTE) portal or by calling 855-8WE-HELP/855-893-4357 so it can be mitigated.



Use precaution:

- Even when you're 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 (i.e., 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, and company confidential information); and
- Never write down or record customer credit and debit card information outside of the secure payment channels.

Note: If you're uncertain whether you can share information, contact Privacy Law or your Compliance Officer.



Intellectual Property

Employees must ensure that they’re always protecting The Hartford’s intellectual property. The Hartford’s patents, trademarks, domain names and copyrighted materials are valuable assets of the company. Intellectual Property Law protects these assets while encouraging the creation of innovative solutions and ideas.

Protecting The Hartford’s trademarks is critical to protecting The Hartford’s brand. The Hartford’s brand including our company name, stag logo and trademarks is one of our most important corporate assets. You cannot use the brand or The Hartford’s trademarks without prior company authorization, and any authorized use needs to be in accordance with the [company’s brand policies](#).

It is very important for The Hartford’s employees to be aware of what is protected by copyright. You cannot allow the unauthorized reproduction or distribution of our software, created materials or any other unauthorized use of our intellectual property and information assets as these are all protected by copyright. Company confidential information is classified and must always be marked confidential and not disclosed outside the company without proper protection and authorization. Employees should understand and follow all standards, policies and procedures that tell you how to protect, use, store, transmit, share and destroy data and information.

Employees should also respect the intellectual property rights of third parties by ensuring that you have the appropriate rights and permissions before using any third-party materials.



Other Company Assets

The Hartford’s other assets such as computers, laptops, mobile devices, computer files, materials and systems must be protected. All company property in an employee’s possession must be returned at the appropriate time, such as at the end of an employee’s employment with the company. All systems, including the rewards and recognition system, need to be used appropriately and in accordance with the Code.

Employees should not use company applications or third-party applications purchased by the company for personal use. Employees who are found to conduct personal searches using such applications will be subject to disciplinary action.

Employees have access to various tools, systems and applications containing information. In some instances, this includes files and data directly related to a product or loss involving them personally or someone they know. Employees must not access these files or attempt to influence the outcome of such scenarios, as this would constitute a direct conflict of interest and misuse of company assets.

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 our 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 deciding to invest in our securities.

It can sometimes be difficult to know whether information would be considered material. If you're uncertain whether information is material, then presume it to be material for the purposes of the Insider Trading Policy.

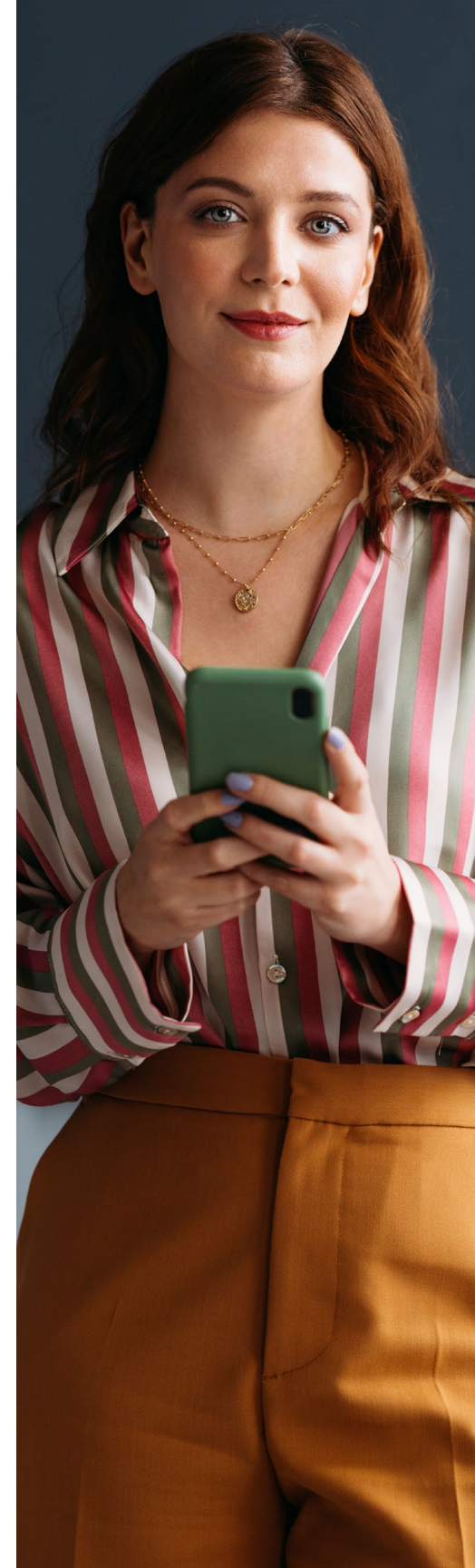
No director, officer or employee of the company shall disclose or use any confidential information gained as a result of his or her position with the company for trading purposes, personal profit or for the advantage of any other person. Directors, officers and employees are prohibited from buying or selling company securities while they are aware of material nonpublic information about the company. Further, no director, officer or employee may disclose such information to others who might use it for trading or might pass it along to others who might trade.

As a reminder: Information is nonpublic unless it has been made available to the general public. As a general rule, information is considered available to the general public if it is included in a press release issued over a national news wire service, in a filing with the Securities and Exchange Commission or posted to the company's website and a full trading day has elapsed since its release.



Consult with the
[Law Department](#)

before communicating information about the company's capital, financial results and outlooks, business plans, ratings or strategy (whether previously disclosed or not).



Inside Information

In the course of their employment with International, employees may become party to certain information, which is either confidential, legally privileged, price sensitive or commercially sensitive.

This includes details of any business ventures or opportunities that International's employees may become aware of or assist in the development thereof. Such information will be deemed to be 'inside information' if:

- It is specific and precise;
- It has not been made public;
- It relates to particular securities, financial instruments or issuers of either;
- If it were to be made public, it would have a significant effect on the prices of those securities, financial instruments or related derivative financial instruments.

Both during employment and after leaving International, employees shall not disclose confidential information or trade secrets that were learned during their employment with International to any unaffiliated organization or person, unless required by law. No information obtained during an employee's employment with International may be used for profit or as the basis for a "tip" to others, **unless such information has been made generally available to the public.**



Records Management and Suspension Holds

Our Records Program ensures that the company complies with all applicable statutory and regulatory requirements for retaining records. Effective records management promotes consistent and reliable retention and ensures that records can be retrieved promptly when required for legal, regulatory or operational reasons. Failure to comply with the Records Program can result in adverse consequences for The Hartford, including regulatory enforcement actions, reputational risk, adverse liability or litigation risk.

Personnel Records: Managers must follow the [Personnel Records Policy](#) and [Personnel Records Guidelines](#), which include ensuring personnel records for current and former employees are properly maintained and stored in accordance with the retention requirements.

Note: It is the responsibility of every employee to effectively manage the creation, use, retention and destruction of records. This includes a broad range of responsibilities, including preparation of tangible records for off-site storage, proper evaluation and storage of email and other electronic records, and classification of all official records, regardless of their form, into the proper Record Class as defined in the Retention Schedule.

All employees need to review the [Records Management Policy](#) to understand the different requirements of managing business records. If you're unsure if something is a business record (Official Record) reach out to Corporate Compliance or ask your manager.



HIMCO employees should refer to the HIMCO Records Retention Policy as their requirements differ from the Enterprise.

Business Related Communications

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.

Additional details on the Mobile Device Policy and mobile use can be located on the [M365 Mobile site](#).

Suspension Holds

Sometimes we may issue a Suspension (legal) Hold notice that will tell you to keep certain records past their established retention period because of an actual or threatened legal matter. Suspension Holds ensure that The Hartford will fulfill its obligations related to current, pending or imminently likely litigation, government or self-regulatory organization investigations or proceedings and internal or external audits.

If a Suspension Hold has been put in place, all Records related to the designated subject matter, including Unofficial Records, must be preserved.



If you become aware of any of the above or any other circumstances which lead you to reasonably believe that litigation, an internal or external audit or investigation, a government investigation or official proceeding is likely, immediately report it to your Compliance Officer.



You must follow these guidelines to ensure the best protection for the company:

- ✗ 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 Suspension 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 Suspension Hold.



Reporting Accuracy

Our commitment to excellence and integrity are reflected in the reports we prepare for internal and external uses. When preparing a report, you must follow company policies and represent The Hartford's business information truthfully and accurately.



Immediately report any concerns regarding the integrity of financial reports.

Financial & Business Reports

- Our shareholders, business partners, regulators and the public rely on us to make accurate, timely reports of financial information. Follow these guidelines when creating financial or business reports.
- Reports may be in electronic, paper or other forms, 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 noncorporate account.
 - Do not attempt to influence, coerce, mislead or interfere with the accurate preparation and auditing of financial statements.
 - You must keep honest, accurate and complete records of all business-related transactions. Never misrepresent facts or falsify information on timekeeping records or expense reports.
 - Only seek reimbursement for actual, reasonable and authorized business expenses.
 - Be sure to always safeguard and be a good steward of all company assets within your control.

External Requests for Information

Immediately send all requests from news media for interviews, comments or information on behalf of The Hartford to [Media Relations](#).

Immediately send all requests from analysts and investors for financial information about The Hartford to the [Investor Relations Department](#).



Ethically Engage for Business

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 which impact our interactions with customers, partners and competitors.

In this section

- ▶ [Fair competition and quotes](#)
- ▶ [Competitive intelligence gathering](#)
- ▶ [Global trade and sanctions](#)
- ▶ [Anti-money laundering](#)
- ▶ [Anti-trust measures](#)
- ▶ [Managing government relationships](#)
- ▶ [Responsible AI relationships](#)





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 need to be accurate, and all sales and marketing materials need to be honest and complete.

Quotes must follow these guidelines:

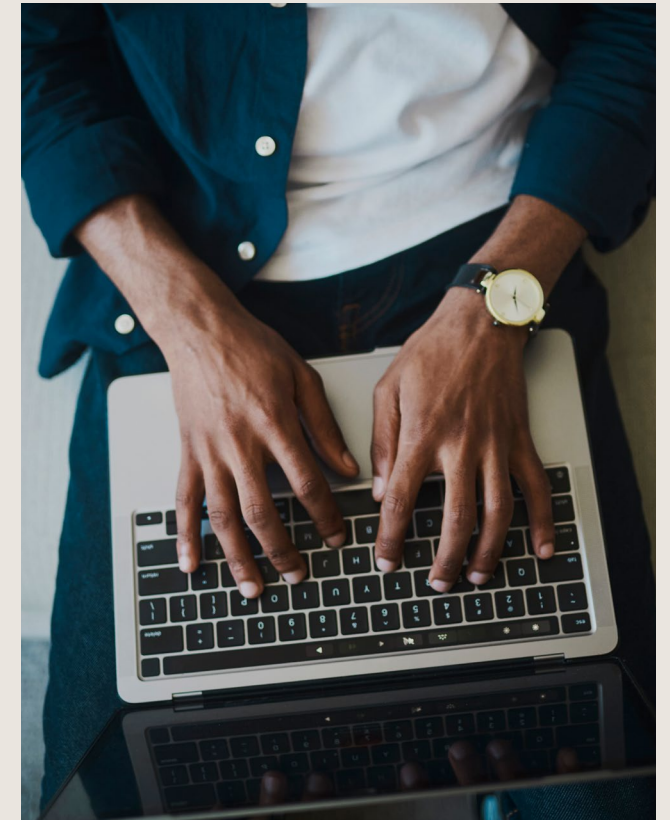
- Must be underwritten for each insurance risk and priced on their own merits.
- May state a good faith estimate of the premium as non-binding and subject to further review.
- Ensure terms and conditions adhere to current product filings.
- Must be delivered in a final version that clearly specifies all required terms and conditions.

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



Competitive Intelligence Gathering

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 and Sanctions

Global trade and financial sanctions prevent us from doing business with certain countries, entities and persons. To prevent prohibited transactions, we do daily scanning and screening of our customer names, locations, vendors, and payments against U.S. and foreign government lists of countries and parties under trade or economic sanctions.

When dealing or transacting business with The Hartford, our vendors and providers must comply with applicable sanctions, laws and regulations of any country in which the vendors/providers conduct

business on behalf of The Hartford, and furthermore they must not, directly or indirectly, engage in any transaction or activity which would cause The Hartford to violate these laws and regulations. The scanning and screening procedures are performed on our various administrative, premium and claim payment processing systems. In the event a screening indicates a possible prohibited party or transaction, the issue is escalated and 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.
- 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.

Note: Knowing your customer well is beneficial as it allows you to spot activity that may be out of the ordinary for them. Understanding their identity, sources of funds, anticipated account activity, and actual account behaviors are all important.

Anti-trust 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 for insurance or services.
- Never divide markets or allocate customers for 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.



Immediately report any unethical or questionable request by any agent, broker or other distribution partner to your [Compliance Officer](#).



Managing 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.

It is unethical and illegal to provide something of value to a government official for influencing laws and decisions, business deals, or to obtain some other advantage. 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

The Hartford’s policies require that you get prior written approval for many activities involving government officials (including state-level regulatory officials) or political candidates. This is due to many activities seeming innocent but being in violation of the law.

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 such as departments of insurance, that are owned or controlled by governments.

Note: The Code and The Hartford’s policies should be reviewed before providing anything of value to anyone connected with a government entity or before you attempt to influence or sell to any government official. These policies are designed to help protect you and the company.

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 and Industry Relations Group](#):

- Make contacts to influence legislation, regulatory policy or rulemaking, including activities related to trade association or industry association efforts (e.g., fly-ins).
- Contact state and federal insurance department officials and their staffs to try to influence regulatory policy or rulemaking.
- Hire outside counsel, panel counsel, public affairs firms or consultants to lobby government officials on behalf of The Hartford.
- 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 and Industry Relations Group before you:

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

Note: Employees may receive legislative action alerts from external organizations to their work emails. Participation in these alerts is permissible as long as the employee participates through their personal email and on their own behalf.



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

While The Hartford encourages employees to participate in the political process, there are laws that limit or prohibit donations from certain employees because The Hartford has contracts with local and state governments. The intention of these laws, often called Pay-to-Play laws, is to create greater openness and fairness in state and local bidding, contracting and purchasing by restricting the political activity of certain employees of government contractors. The Hartford could be fined and/or lose business if it violates these laws.



If you are an employee that meets any of these conditions, you must gain approval prior to engaging in specific situations:

- All employees in Tiers 1-5;
- Officers of any company of The Hartford;
- Employees providing investment advisory services in connection with state and local government business, including, but not limited to, all HIMCO employees;
- Employees who are responsible for soliciting or negotiating state and local contracts;
- Employees who supervise non-employees that solicit state and local contracts; and
- Employees notified by The Hartford of their designation as “Covered Associates” as the SEC Pay-to-Play Rule defines that term.

Note: Employees are prohibited from inviting a public official to participate or attend a Hartford-sponsored event (town hall, ceremony, etc.).



If any of those conditions were met, you must obtain approval by completing the [Political Contribution/Activity Request Form](#) before **you, your spouse or dependent children** volunteer for or donate money to:

1. Any candidate for a state or local office or any state or local government official and/or
2. Any political party or other political organization, except as follows:

Preclearance is not necessary for:

- » 501(c)(4) (social welfare) and 501(c)(6) (trade) organizations.
- » Super PACs (Independent Expenditures Only Committees).
- » Amounts under \$150 to federal political parties or committees (note: this exception does not apply to Mutual Fund employees identified as Covered Associates).

These restrictions do not apply to contributions to The Hartford Advocates Fund or if the donation is to a candidate for federal office, unless the candidate is currently a state or local official running for federal office. If unsure as to what restrictions apply to your specific situation, 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 US Foreign Corrupt Practices Act (FCPA), UK Bribery Act and the Canadian Corruption of Foreign Public Officials Act. The consequences for not complying can be severe, for both you and The Hartford.

Avoiding Bribery

To avoid being guilty of bribery, never 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 as 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 domestic and/or international laws.



Examples of activities that are unacceptable and may be considered a bribe:

- ✗ If The Hartford paid to fly officials from Tokyo to our Miami office to help familiarize them with our company and its executives.
- ✗ If The Hartford gave the officials three-day passes to Disneyland, paid for rooms at a 4-star hotel and provided cash for their meals.
- ✗ If The Hartford paid for one of the officials' wives to fly out after business concluded.
- ✗ If The Hartford gave the officials golf shirts with The Hartford logo.



Engagement 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 to expedite 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 asked to make a facilitation payment must immediately contact the CECO or their Compliance Officer.



Responsible AI

Our commitment to integrity and ethical operations is a cornerstone of our company culture. We want to be known not only for what we deliver – including financial results and stakeholder value but also for how we deliver. We have a governance framework established to review potential Generative AI tools prior to company ingestion. Once a tool or technology has been approved for use, every employee is accountable for ethical behavior when working with such tools.

We expect employees to make ethical business decisions daily. The expectations when using Generative AI tools are no different. Employees are responsible for ensuring that the generated content produced using Generative AI aligns with The Hartford's values, ethics and quality standards. All employee conduct must be consistent with The Hartford's Responsible AI Principles which have been established to guide employees. These principles consist of explainability, fairness, accountability, fit for purpose and privacy and security.

Responsible AI, Data and Model Ethics Principles

- Explainability: An explainable system allows users to understand and trust its output.
- Fairness: A fair system does not result in unfair discrimination against people or groups.
- Accountability: An accountable system is governed and monitored appropriately.
- Fit for Purpose: A fit-for-purpose system provides a valid solution for the problem it is intended to solve.
- Privacy and Security: A private and secure system protects individual and company privacy, respects data use rights and has appropriate security.



Sustainability Practices

As a company in business for more than 210 years, we know what it takes to be sustainable – listening and adapting to remain relevant to customers and distribution partners, operating in a way that instills trust and confidence, fostering an inclusive environment for our employees and delivering value to stakeholders in ways that transcend the products and services we offer. And while we take pride in what we have accomplished in the past, we come to work every day, eager to innovate, progress, listen and grow. This continuous improvement mindset is at the core of our sustainability strategy.





The Hartford's business strategy is rooted in a deep understanding of the complex and dynamic world around us and a commitment to operate sustainably and ethically. Every day, we devote ourselves to our customers and the risk and reward they face each day. We take nothing we do — and no decision we make — lightly, always finding ways to do more and to do better. Our efforts include initiatives that foster risk awareness and mitigation, resiliency, health and well-being, financial literacy and inclusion, and entrepreneurship, as well as Human Achievement programs that support communities through education, philanthropy and volunteerism.

Read [The Hartford's Sustainability Report](#) to learn more about how we continue to make an impact and continue to make progress toward our goals.

Employee Engagement

Our employees have multiple avenues to engage with and learn from their colleagues, some of them include:

Employee Resource Groups (ERGs) – More than 50% of The Hartford's employees participate in at least one of our nine ERGs. The value proposition of ERGs is strong in that ERG members are stronger performers, more highly engaged and are more likely to stay with the company. There are nine 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.

- 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

Courageous Conversation Circles – These facilitated discussions, called C3s for short, empower employees to discuss complex topics in a safe space, building trust and increasing productivity. Employees respectfully discuss topics such as age assumptions, religion in the workplace, race, emotional health and bringing your full authentic self to work.

Volunteering and Giving – 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 eight 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.



Manager Support

Managers exercise great influence on employee attitudes and behavior. At The Hartford, they play an essential role in creating, nurturing and sustaining an ethical culture and an ethical workforce. As a manager, you must set the right tone and always be a role model of appropriate behavior in accordance with our values, the Code, our policies and applicable laws. The more you talk to your employees about ethics, culture and values, the more comfortable they will get about raising concerns and speaking up.

In this section

► [Manager responsibilities](#)





Manager Responsibilities

As a manager, you are always accountable for:

- Ensuring that your employees understand their responsibilities under the Code and other policies.
- Taking opportunities to discuss the Code with employees and reinforcing the importance of ethics and compliance.
- Creating an environment where employees feel comfortable raising concerns.
- Helping employees understand the value of acting with integrity – when evaluating an employee's job performance and behaviors, always consider their conduct in relation to the law, the Code and our policies.
- Encouraging ethical conduct and compliance with our values, the law, the Code and our policies, and discouraging questionable action to achieve short-term business results.
- Immediately reporting known or suspected violations of the law, the Code or our policies to your Compliance Officer or the Chief Ethics & Compliance Officer.

Note: The word **ethics** can sometimes feel heavy. Help your employees understand that fundamentally it really is all about **Doing the Right Thing** at all times.

Additional manager resources are available on the Ethics and Compliance site under [Manager Resources](#).



We understand that as a manager you will be faced with addressing ethical questions or concerns from employees. Here are some guidelines to follow when doing so:



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 must give an immediate response.



Don't promise complete confidentiality to the employee in advance – as a manager you may have a duty to disclose the matter.



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.



Disclaimers and Resources

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.

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.

Hartford Funds

Hartford Funds may have requirements that differ from the Code of Conduct. Please refer to the Hartford Funds Compliance Center or contact a member of the Hartford Funds Compliance department with questions.

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.

Interpretation, Policies, Updates and Modifications

The Code references many of our policies. All of our policies are available on iConnect. Ethics and Compliance policies are located on the [Ethics and Compliance site](#) and [HR policies](#) are located on the HR site. 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.





The Hartford