



TALCOTT
RESOLUTION

Code Of Ethics And Business Conduct

The Code of Ethics and Business Conduct was last updated on May 25, 2023 for technical, administrative and other substantive changes.

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Talcott Resolution is an insurance company committed to maintaining its reputation as an ethical business. Talcott Resolution's leadership team is committed to preserving a high-trust environment that fosters diversity, equity, and inclusion, a positive culture, and most importantly, ethical behavior.

This Code of Ethics and Business Conduct is a resource for all employees to help support ethical behavior and decisions, as well as to help demonstrate our core values and behaviors each and every day.

Our Values

Personal accountability, integrity, passion, respect for others, and a focus on results.

Our Behaviors

Act with integrity, think like an owner, have a bias for action, be a student of the business, and be a team player.

Talcott Resolution expects that the contents of this Code of Ethics and Business Conduct (Code) will be followed. Violations may result in disciplinary action on employees up to and including termination of employment. Unlawful actions that violate the Code may also be subject an individual to civil and criminal prosecution by the relevant authorities.

Thank you to all Talcott Resolution employees for your dedication and hard work in protecting our reputation.

Act ethically and share concerns



Our Code of Ethics and Business Conduct is a guide to behaving ethically every day at Talcott Resolution. The 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.

Sharing concerns about compliance with our Code, policies, or the law is not optional – it is an obligation of everyone at Talcott Resolution.

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 Talcott Resolution.

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. Talcott Resolution maintains these standards to guide with the daily decisions and actions that allow Talcott Resolution to make a difference and live the principles in the Code.

By doing the right thing, Talcott Resolution fosters a culture of compliance and make Talcott Resolution a top workplace.

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 Human Resources at HumanResources@TalcottResolution.com
- Contact Compliance at TalcottResolutionCompliance@TalcottResolution.com
- Contact Ombudsperson at Ombudsperson@Talcott.com and 860-791-0200
- Contact EthicsPoint at <http://www.ethicspoint.com>, our outside service vendor which provides anonymous reporting

If the matter involves accounting, internal controls, or auditing, you should report it to the Chief Auditor, who will review the matter with the Audit Committee of Talcott Resolution's Board of Directors, as appropriate.

Attorneys at Talcott Resolution 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 the Corporate Secretary.

Anonymous reporting and non-retaliation

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

You also may contact Talcott Resolution's internal Ombudsperson to report or discuss a workplace question or concern confidentially.

Keep in mind that if you choose to remain anonymous, it may limit Talcott Resolution'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 greatest 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. Talcott Resolution 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 Talcott Resolution's values, the Code, and other policies, and applicable laws.

As a manager, you must:

- Ensure that your employees understand their responsibilities under the Code and other policies
- Immediately report known or suspected violations of the law, the Code, or Talcott Resolution's policies to Human Resources, Compliance, or EthicsPoint

Respect others



Talcott Resolution is an Equal Opportunity Employer and **prohibits discrimination and harassment of any kind**. Talcott Resolution is committed to the principle of equal employment opportunities for all employees and to providing employees with a work environment free of discrimination and harassment.

All employment decisions at Talcott Resolution are based on business needs, job requirements and individual qualifications, without regard to race, color, religion or belief, gender, family or parental status, or any other status protected by the laws or regulations in the locations where we operate.

Talcott Resolution's demonstrates character daily when we respect each other, come forward with ethics concerns, and protect the interests and assets of Talcott Resolution.

When we respect other people and ourselves, Talcott Resolution naturally avoids harmful and hurtful behaviors. We are both legally and ethically obligated to be considerate and avoid harming others either emotionally or physically.

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

Harassment and discrimination

Talcott Resolution does not tolerate any form of workplace harassment, discrimination, or bullying.

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.

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 sexual advances or unwanted physical contact
- Avoid interfering, undermining or undervaluing someone's work performance because of their personal characteristics
- 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. The mistreatment can include verbal, nonverbal, psychological, and physical abuse, as well as humiliation. Unlike harassment and discrimination, bullying and abusive conduct is not necessarily based on personal differences.

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 form of workplace harassment, discrimination, or bullying.

Responsibilities

You should report any form of harassment, discrimination, or bullying you might encounter through work, even if the offender is not in your reporting line.

This includes:

- whether the offender is an employee or non-employee
- whether on Talcott Resolution premises or off site

Concerns with harassment, discrimination, or bullying should be reported to either Compliance, Human Resources, or EthicsPoint.

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 and threats

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

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

While driving for business, refrain from activities that distract you from driving. 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 and comply with our Distracted Driver Policy.

Talcott Resolution could be held liable for accidents caused by an employee's distracted, negligent, or careless driving. An employee is required to obey all driving and traffic laws when operating any motor vehicle in the course of performing Talcott Resolution duties. Failure to do so could result in disciplinary action, up to and including termination of employment.

Required Notifications

The U.S. prohibits financial services companies like Talcott Resolution 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 Compliance, Human Resources, or EthicsPoint if you, another employee, or a business partner are or have been involved with any of the following criminal actions:

- A conviction for a felony
- A conviction for a misdemeanor involving conduct in financial services
- A conviction for any crime involving dishonesty, breach of trust, sexual misconduct, violence, or illegal sale or distribution of drugs, narcotics, or firearms
- A pre-trial diversion or intervention program related to a criminal prosecution involving dishonesty, breach of trust, money laundering, sexual misconduct, violence, or illegal sale or distribution of drugs, narcotics, or firearms

Avoid and disclose conflicts of interest



A conflict of interest is something that interferes with your job or your ability to decide and act in the best interest of Talcott Resolution. It also can be something that competes with or interferes with Talcott Resolution'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
- Personal relationships
- Outside employment
- Political activities
- Volunteering
- 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 Talcott Resolution.

Use the following checklist to help you:

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

If you can answer 'Yes' to any of these questions, then you may have a conflict of interest unless it involves legally protected employee communications and activities.

Discuss the matter with your manager or Compliance 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 typically can avoid conflicts of interest with Talcott Resolution if you follow our simple Dos and Don'ts Decision Aid available as an appendix.

Keep in mind that these guidelines are not meant to restrict legally protected employee 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, give endorsements, or engage in some other personal activity, except for protected communications and activities.

For additional guidance on social media use, go to the ADP Workforce Now site to see a helpful decision-making tool.

Keep in mind that aside from protected communications and activities, use of the Talcott Resolution name, brand, or logo is permitted only if approved by the Talcott Resolution Communications team as detailed in the Media Relations and Social Media policies.

Outside employment conflicts of interest

Because of the possibility of a conflict of interest, seek approval in advance from Compliance for the following activities:

- You are an attorney or accountant and want to perform legal or accounting services for clients other than Talcott Resolution
- 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 Talcott Resolution or for another company in the financial services or insurance businesses

Board of directors' conflicts of interest

Before agreeing to serve on a board of directors (other than for a Talcott Resolution affiliated company), you should discuss it with your manager and inform Compliance. You will need the consent of Compliance 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, Compliance 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 Talcott Resolution's interests. Understand that any approval to serve on an outside board does not mean that Talcott Resolution 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 Talcott Resolution. Remember that employees who serve on the board of a non-profit organization are always personally responsible for any financial contributions they may be expected or choose to make as board members.

Personal relationships conflicts of interest

Closely related persons cannot work at Talcott Resolution if one person has management control or influence 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 and make it clear that you do not represent or speak on behalf of Talcott Resolution in these matters. Please refer to Talcott's "pay-to-play" restrictions before making or raising monetary contributions for political candidates.

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.

Talcott Resolution does not give corporate contributions to political candidates or parties, even where allowed by law. If you would like to use corporate funds for nonpartisan voter education purposes, you must get prior approval from Government Affairs.

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 Talcott Resolution, there may be a conflict of interest. It is best to avoid investing in our competitors, vendors, and business partners.

Conflicts of interest also may arise if Talcott Resolution 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, Talcott Resolution cannot make personal loans or other extensions of credit to employees or their immediate family members, unless approved in advance by Compliance.

Disclosure of conflicts of interest

As soon as you become aware of any potential or actual conflict of interest, immediately report it to your manager or Compliance. You will receive 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 Talcott Resolution has a potential conflict of interest, you can report it without any fear of retaliation. You also can make an anonymous report through EthicsPoint.

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

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 as doing 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 or state 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 Talcott Resolution that you have made such reports or disclosures.

Protect what is ours



Whether you are working at the office or remotely, you must carefully protect the information that has been entrusted to Talcott Resolution 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 needed and permitted and take every precaution to protect it.

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

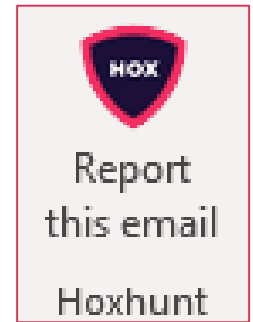
Information security

Consequences of a data breach can be severe.

One of the most common sources of a data breach is through the loss or theft of portable devices such as laptops, smartphones, and flash drives.

Be sure 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.

Phishing emails are another way scammers attempt to manipulate people into divulging confidential or sensitive information that they will use to commit fraud or obtain access to Talcott Resolution's systems. Select the Hoxhunt button in your email to report any suspicious email.



Customer and employee privacy

Confidential information should be classified and marked confidential and should not be disclosed outside the company without proper protection and authorization. State and federal privacy laws and our contractual obligations restrict the ways we can share certain customer, employee, or business partner information. Included within the confidential information is Personally Identifiable Information (PII). Examples of PII are Social Security numbers, passwords or PIN numbers, or other data that would allow a person to be identified.

If you do not know whether you can share information, contact Compliance. 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 personally identifiable and confidential or sensitive information before sending it electronically.

You must immediately report any suspected or actual unauthorized access to or disclosure of information, including consumers' data or anyone's PPI, by emailing Privacy@TalcottResolution.com immediately. Report all information incidents, whether intentional or inadvertent.

Privacy program

Talcott Resolution will conduct its business in compliance with the general principles and standards in the Privacy Program and related procedures developed by the business areas consistent with the Privacy Program, related standards, and procedures.

Talcott Resolution's Privacy Program Resources include:

- Privacy notices located on external website: talcottresolution.com
- Privacy Program standards and policies found on Talcott Resolution's internal site
- Talcott Resolution's cybersecurity policies found on Talcott Resolution's internal site
- Annual Information and Privacy Training

Talcott Resolution staff are required to:

- Print sensitive and/or confidential documents only as necessary and ensure printed documents are properly disposed of in the designated shredding bins
- Secure documents, drawers, file cabinets, and laptops, and portable/personal devices like smart phones
- Use Company resources for business related activities only
- Ensure digital assistant (e.g., Alexa, Google Home, etc.) microphones are muted during business hours

Other company assets

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

Occasionally, an employee will receive a payment from Talcott Resolution to which they are not entitled, such as an overpayment of wages, 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.

Material non-public information

Material non-public information includes any information not yet known to the public that a reasonable investor might consider relevant to deciding to invest. Buying or selling securities while in possession of material non-public 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 non-public information gained in the course of your employment for buying or selling securities.

Also, failure to protect and control the distribution of material non-public and other sensitive information could harm Talcott Resolution and potentially violate the federal securities laws. You should consult with the Law Department before communicating information about Talcott Resolution's capital, financial results, and outlooks, business plans, ratings, or strategy (whether or not previously disclosed).

Insider Trading

All employees are subject to the Insider Trading policy which is available on the ADP Workforce Now site. No employee shall disclose or use any confidential information gained because of their position for trading purposes, personal profit or for the advantage of any other person. No employee may disclose such information to others who might use it for trading or might pass it along to others who might trade.

Employees are prohibited from buying or selling securities of any company while they are aware of material, non-public information about that company, if such material, non-public information was gained because of their position. Further, employees may not disclose such information to others who might use it for trading or might pass it along to others who might trade.

Intellectual property

You should protect Talcott Resolution'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.

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, technology platforms such as for the use of social media, company web meetings and blogs, and Bring Your Own Device software. If you leave Talcott Resolution, you cannot remove, copy, use, or disclose any proprietary or confidential company or customer information.

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

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

Any questions or requests should be addressed by Intellectual Property Law.

Records retention and legal holds

Talcott Resolution retains records for as long as required by law and as reasonably necessary to conduct business. Talcott Resolution 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.

Sometimes Talcott Resolution 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, do not dispose of relevant records until the legal hold is 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 Compliance.

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

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 Talcott Resolution improve and solidify business relationships. However, Talcott Resolution employees always must take care not to create any appearance of an improper attempt to influence business decisions. When ethics prevail and instruct us in the way Talcott Resolution employees offers and accepts gifts and entertainment, there cannot be an appearance of a conflict of interest or impropriety.

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 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 (Talcott Resolution's 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 of any value to elected officials or government representatives require prior approval from Government Affairs.

Gifts and entertainment needing approval

If the gift or entertainment complies with the Travel and Entertainment Policy for what is acceptable, then you may accept it, provided you get written approval per the Policy for exchanges over a certain U.S. dollar limit. Pre-approval from the CFO is required for certain expenses.

The Travel, Expense & Entertainment Pre-Approval Policy and Form must be used for the preapproval of T&E expenses (i.e., before they are incurred) within the following criteria:

- Events or Entertainment expenses that will be received by, or hosted by, a company employee that will be \$250.00 per person or more or if the event or entertainment total cost \$10,000 or more (regardless of internal allocations)
- Gifts to or from a non-employee with a value greater than \$100 or more
- Contributions to Third-Party Sponsored Business Events of \$20,000 or greater
- Contributions to Third-Party Sponsored Charitable or Political Events
- Recognition/Reward/Appreciation Event for Talcott Resolution employees with a cost of greater than \$10,000
- Expenses for an employee offsite outing and/or team building exercise exceeding \$10,000
- Use of company facilities should be the first option

Manage government relationships



Talcott Resolution manages 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.

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. Talcott Resolution 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 be in violation of laws. Talcott Resolution's policies require that you get prior written approval for many activities involving government officials or political candidates.

Contact Government Affairs 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 Talcott Resolution policies before you provide anything of value to anyone connected with a government entity, or before you attempt to influence any government official. The policies help protect you and Talcott Resolution.

U.S. Government interactions needing approval

Employees and board members of Talcott Resolution may not engage in any of the following activities without first getting approval from Government Affairs:

- 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.
- Offer any gifts, gratuities, or entertainment, even of a token nature, for the personal use of any government official or employee.

“Pay-To-Play” restrictions

If you are an officer, an employee in the Senior Executive or Executive Career bands, a provider of investment advisory services to U.S. state and local governments, or an employee responsible for soliciting and negotiating contracts with U.S. state and local governments, you need to get approval from Government Affairs 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).
- Let a member of your immediate family participate in such activities

Failure to comply with pay-to-play laws may prevent Talcott Resolution from conducting business with city and state governments. To protect Talcott Resolution’s ability to keep and conduct 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.

Working with foreign government officials and the foreign corrupt practices act

Wherever employees or board members 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).

Consequences for not complying can be severe, for both you and Talcott Resolution.

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

There is no minimum value to what may be considered a bribe. The FCPA considers the following items, among others, to be 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.

Dealing with third parties

Third parties cannot offer bribes on our behalf. If you are involved with third parties that contact non-U.S. government officials for any reason involving Talcott Resolution, you must be alert for suspicious or unusual activity that could indicate potential bribery and corruption.

Warning signs include:

- Refusal to accept an FCPA clause in a contract
- A reputation for bribery or breaking laws
- A close relationship with non-U.S. government officials
- Unusually high commissions
- Payment to an account outside the country of residence
- Undisclosed principals or subcontractors sharing fees

Getting approval for facilitation fees

Do not consent to paying any “facilitation fees” to expedite business matters in another country without getting prior approval from Compliance. Make sure that all money spent in dealings with any non-U.S. government or entity is accounted for fully and in detail.

Maintain ethical standards



Excellence means more than just growing Talcott Resolution's business. It means winning fairly, ethically, and legally. Talcott Resolution's success and reputation depend on complying with the many rules impacting our day-to-day interactions with customers, partners, and competitors.

Maintaining ethical standards requires understanding our Company's Code of Ethics and Business Conduct and being alert to warning signs of improper practices by others.

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 Talcott Resolution's 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.

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 Talcott Resolution, but they may also violate the law and lead to civil and criminal penalties.

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 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 Compliance
- Be aware of your restrictions and responsibilities when participating in industry groups and forums

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

OFAC: Office of Foreign Assets Control

Economic and trade sanctions imposed by the Office of Foreign Assets Control (OFAC) prohibit Talcott Resolution from doing business with certain persons, entities, and countries. To prevent prohibited transactions, Talcott Resolution scans customers, agents, vendors, employees, and payments, from various administrative processing systems, against U.S. government watchlists.

Anti-money laundering

Talcott Resolution is firmly committed to combating terrorist financing, money laundering and other financial crimes. Talcott Resolution prohibits and seeks to prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities.

Always be alert to warning signs of money laundering, terrorist financing and other financial crimes. Some Red Flag indicators include:

- Withdrawing funds shortly after depositing them
- Closing a contract without regard to penalties
- An unusual use of cash equivalents
- Reluctance to provide identifying information
- Withdrawals/terminations after a recent address or name change
- Withdrawals distributed outside the United States

Knowing your customers' identity, source of funds, and anticipated account activity will help easily identify unusual activity.

Concerns/questions regarding potential money laundering or sanctions can be directed to amlcompliance@talcottresolution.com

Suspected fraud

Any fraud or suspicious activity observed by Talcott Resolution staff must be reported through the following options:

- Manager
- Service Resolution Wizard
- EthicsPoint for anonymous reporting

Make accurate reports



Talcott Resolution's commitment to excellence and integrity are reflected in the reports prepared for internal and external uses. Any report you make reveals your attention to detail, desire for accuracy, and adherence to policies.

Whether Talcott Resolution is making an internal report or an external report of business information, it must be truthful and clear.

Financial reports

Talcott Resolution's investors, 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 Talcott Resolution 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 any corporate records including financial statements or expense reports, and seek reimbursement only for actual, reasonable, and authorized business expenses.

Talcott Resolution must be truthful and never misrepresent the facts about the benefits, advantages, conditions, or terms of our products and services.

External requests for information

All reporters or media requests for interviews or information about Talcott Resolution, including requests for financial information, should be referred directly to the Talcott Resolution Communications team at Communications@TalcottResolution.com.

Disclosure

Proper disclosure requires the release of all relevant information that may influence an investment decision.

Disclosures with customers and business partners must be accurate, complete, consistent, clear, material, and timely.

Employment at will

Talcott Resolution's 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. Employment is "at will," meaning an employee or Talcott Resolution 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 Talcott Resolution rarely grants waivers or exceptions. You should make any request for a waiver or exception through your manager or Compliance before you act.

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

Interpretation, policies, updates, and modifications

The Code references many of Talcott Resolution's policies. All the policies are available on Workforce Now. Because of the changing nature of our regulatory environment, Talcott Resolution must be able to change the Code and policies at any time, without advance notice. Only Talcott Resolution has the right to administer and interpret Code provisions and policies.

Although the Code and policies may change over time, Talcott Resolution's shared values will continue to guide its decisions.

We always strive to act with integrity and honesty, remaining accountable in everything we do.

Talcott Resolution Leadership team



Executive Leadership

Lisa Proch	Interim Co-President, General Counsel, and Chief Compliance Officer
Robert Siracusa	Interim Co-President and Chief Financial Officer
Christopher Abreu	Chief Risk Officer
Ellen Below	Chief Communications Officer and Head of Implementation
Matthew Bjorkman	Chief Auditor
John Brady	Chief Actuary
Christopher Cramer	Deputy General Counsel, Chief Tax Officer, and Corporate Secretary
Diane Krajewski	Chief Human Resources Officer and Head of Operations
Peter Manley	Head of Corporate Development and Strategy
James O'Grady	Deputy Chief Investment Officer
Matthew Poznar	Chief Investment Officer
Samir Srivastava	Chief Information Officer

Human Resources

Joseph Adamo	Head of Total Rewards and HR Operations
Julia DeSimone	HR Director
Mark Hacker	HR Director

Compliance

Christopher Conner	Assistant General Counsel, Securities and Broker-Dealer Compliance
Bridget Dunn	Head of Government Affairs
Wendi Hedberg	Compliance Officer, Core Compliance

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Further details on the information, policies, and procedures shared here are found in Workforce Now.

Violations of the Code of Ethics and Business Conduct may result disciplinary action by the Company, including termination of employment. Unlawful actions that violate the Code also may subject an individual to civil and criminal prosecution by state and federal authorities.

Do

Be clear you are speaking on your own behalf and not as a representative of Talcott Resolution when sharing your opinions and recommendations.

Disclose your connection to Talcott Resolution when endorsing our products and services.

When acting for another entity or person besides Talcott Resolution, excuse yourself from any actions, discussions, or decisions that might conflict with our interests.

Consider the potential for, or a perception of, bias when relatives or romantic partners are connected in any way to Talcott Resolution.

Don't

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 Talcott Resolution.

Don't compete with Talcott Resolution or become financially involved with competitors, vendors, business partners, or others connected to Talcott Resolution.

Don't make any public or private statements about Talcott Resolution customers, clients, or applicants unless they have a legitimate business reason and you have obtained the required permissions.