



Business Resiliency Plan

DOCUMENT CONFIGURATION CONTROL

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Version 1.0	June 14, 2018	Original published version
Version 1.1	September 15, 2018	Added Actuarial contact, corrected formatting issues
Public Version 1.0	October 22, 2018	Redacted sensitive information for public consumption

Sensitive and confidential information has been redacted from this plan. An un-redacted version may be provided to authorized parties upon request from Talcott Resolution's Legal department.

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1 OVERVIEW

1.1 CONTEXT

On May 31, 2018 a group of investors acquired Talcott Resolution¹ from The Hartford Financial Services Group, Inc. (including its remaining subsidiaries, “The Hartford”). “Talcott Resolution” (or a derivative thereof) will be used as the name for the new company, replacing “The Hartford” in the names of certain legal entities. At some point in 2H/2018 and continually thereafter, Hartford Life Insurance Company will be called Talcott Resolution Life Insurance Company, Hartford Life and Annuity Insurance Company will be called Talcott Resolution Life and Annuity Insurance Company, and American Maturity Life Insurance Company will continue to be called American Maturity Life Insurance Company.

Talcott Resolution has entered into a transitional services agreement (“TSA”) with The Hartford. The TSA covers recovery of key information technology infrastructure and applications until Talcott Resolution has migrated its business applications into a standalone information technology infrastructure. The Hartford has agreed to provide transitional services for up to 24 months. Services, controls, procedures and other measures described herein may be performed or provided by or through The Hartford during the TSA period.

1.2 SUBSTANTIVE OVERVIEW

Through its registered insurance companies, Talcott Resolution has responsibilities to policyholders, other business counter-parties and employees. When a business disruption event occurs (or potentially occurs) and may impair our ability to meet these responsibilities, Talcott Resolution invokes a well understood and practiced set of business resiliency protocols designed to support our customer service functions and also our Investment Services, Risk Management, Information Technology, Finance and Human Resources critical functions until the firm is able to resume “business as usual”.

The Talcott Resolution Business Resiliency plan is supported by the following key capabilities:

- 100% of critical staff have remote work capabilities (company laptop and internet access);
- Alternate work locations (Woodbury, MN or other locations outside of affected area);
- Landlord provided generator capabilities in the event of power loss for Corporate Offices located in Windsor CT;
- Primary data center is in Ashburn, VA and the backup data center is located in Elk Grove, IL
- Vendors, including cloud providers, are able to meet their Service Level Agreements with Talcott Resolution.
- Timely maintenance and distribution of the Business Recovery Plans as the organization’s critical business processes and supporting systems change.

Although Talcott Resolution maintains its own business resiliency plan, its underlying business resiliency plans and processes are integrated into, or part of or reliant on, The Hartford’s corporate plan and support model. The Talcott Resolution Business Resiliency team works closely with The Hartford’s Business Resiliency Office during all

¹ “Talcott Resolution” includes, as of June 1, 2018, Hartford Life Inc. and its subsidiaries. These subsidiaries include, among others, certain U.S.-domiciled insurance issuers, including Hartford Life Insurance Company, Hartford Life and Annuity Insurance Company and American Maturity Life Insurance Company.

potential and actual business resiliency events that involve services provided by The Hartford. The Talcott Resolution primary business resiliency plan for most business resiliency events is remote access for all employees. In addition, the Talcott Resolution Business Resiliency plan also contains detailed plans for: loss of our primary locations, loss of power in our primary location, regional disasters, loss of technology, high absence rates, and severe in-clement weather that would impact the greater Windsor, CT or Woodbury, MN region.

Also included in this document is an outline of other business resiliency functions the Talcott Resolution Business Resiliency team supports, including:

- Twice annual Talcott Resolution Business Resiliency Plan Updates
- Business Resiliency Certifications
- Annual Testing of the Business Resiliency Plan
- Resolution of items identified during any Business Resiliency test
- Annual review of all Business Resiliency Policies
- Quarterly meetings with the Hartford Corporate Business Resiliency Office
- Business Resiliency Certifications and Responses (i.e. SEC, States, etc.)
- Business Resiliency Record Retention

2 BUSINESS RESILIENCY SCENARIOS

2.1 BUSINESS RESILIENCY SCENARIOS

The impact of a Business Resiliency event can be unique and unknown; therefore, Talcott Resolution plans for a range of possible scenarios described below.

2.1.1 Loss of Facility

a. **Key Assumptions:**

- i. The physical work location or facility is not accessible. ii. All employees are safe and available to work, but are not able to access the impacted work location.
- iii. Remote access to systems that resides outside of the impacted work location are available and accessible.

b. **Recovery Strategy:**

- i. Employees have work from home capabilities using VPN solutions.
- ii. Talcott Resolution has two primary work locations which are more than 1200 miles apart, Windsor, CT and Woodbury, MN. The two facilities can be used as alternate work locations for each other.
- iii. The telephony system supporting operations is hosted and managed by a third party. The telephony platform can be configured in 'mobile twinning' mode whereby calls destined for an employee's office phone can be forwarded to an alternate device, such as a mobile or home phone.

2.1.2 Loss of Technology

c. **Key Assumptions:**

- i. The technology that's required to perform key business functions is not available.
- ii. Vendor hosted telecommunications are available.
- iii. All employees are safe and available to work, but are not able to use the core application(s) that support key business processes.

d. **Recovery Strategy:**

- i. During the transitional period, IT infrastructure services that Talcott Resolution relies upon are managed by The Hartford, which has a backup data center managed by IBM in Boulder, CO. Critical technology that is managed by The Hartford, can be restored at Hartford's back-up data center.

- ii. As Talcott resolution designs and builds its own IT Infrastructure, adequate redundancy capabilities will be addressed for all key IT Infrastructure.
- iii. Recovery plans for each Survival and Mission Critical application used by Talcott Resolution are incorporated into the appropriate Application Disaster Recovery Plan (ADRP).
- iv. The telephony platform is managed by a third party, which has a backup data center that can be used if their primary site is unavailable.
- v. Talcott Resolution engages with various third party service providers which support critical functions for the company. Each service provider is required to have an appropriate recovery strategy in-place to support the services they provide to Talcott Resolution.

2.1.3 Regional Disaster

e. **Key Assumptions:**

- i. A natural disaster or other event occurs which impacts a 50-mile radius.
- ii. All employees are safe and available to work, but are unable to access the impacted work location.
- iii. Any and all locations within a 50-mile radius of the primary work location have widespread power or telecomm outages.
- iv. Technology, facilities, and local infrastructure OUTSIDE the 50-mile radius of the primary work location remain unaffected and are available.

f. **Recovery Strategy:**

- i. Employees that have power and telecommunication services can work from home using VPN solutions.
- ii. Employees that cannot work from home due to power or telecommunication outages will be relocated to an alternate facility (i.e. other Talcott Resolution offices, hotels, or other locations outside the impacted areas). Management will work with employees to identify and approve the use an alternate location.
- iii. Talcott Resolution has two primary work locations which are more than 1200 miles apart, Windsor, CT and Woodbury, MN. The two facilities can be used as alternate work locations for each other.
- iv. The telephony platform is managed by a third party, which has a backup data center that can be used if their primary site is unavailable.

2.1.4 High Absence Rate

g. **Key Assumptions:**

- i. An event has occurred which has led to the unavailability of staff (absence rate of 50% or greater). The event could be related to: illness, weather, restricted travel, or infrastructure damage. In this scenario, employees may not be ill themselves, but may need to provide care to those who have become ill.
- ii. The physical work location is available and accessible.
- iii. There is NO impact to the technology required to support this business function.

h. **Recovery Strategy:**

- i. Employees have work from home capabilities using VPN services.
- ii. Talcott Resolution engages with various third party service providers which support critical functions for the company. Each service provider is required to have an appropriate recovery strategy in-place to support the services they provide to Talcott Resolution. Recovering from situations resulting in a high-absence rate are to be included in each respective plan.

3 KEY BUSINESS RESILIENCY ROLES & STRUCTURE

3.1 BUSINESS RESILIENCY COORDINATOR AND BUSINESS RESILIENCY EXECUTIVE SPONSOR

The Talcott Resolution **Business Resiliency Coordinator**, is appointed by the Talcott Resolution **Business Resiliency Executive Sponsor**. The **Business Resiliency Coordinator** is responsible for coordinating Talcott Resolution's response to Business Resiliency events and acting as liaison to Partner and Service Providers Business Resiliency Office's for all matters related to Business Resiliency.

The Talcott Resolution Business Resiliency Executive Sponsor and Business Resiliency Coordinators are:

Role	Business Group
BR Executive Sponsor	Operations and HR
BR Executive Sponsor (back up)	Information Technology
BR Coordinator	Business Operations
BR Coordinator (back up)	Process Owner

3.2 TALCOTT RESOLUTION BUSINESS RESILIENCY FIRST RESPONSE TEAM

The Talcott Resolution **Business Resiliency First Response Team** is responsible for assessing circumstances at the initiation of a potential Business Resiliency event and working with the Talcott Resolution **Business Resiliency Recovery team and Business Resiliency Executive Sponsor**, to determine if the Business Resiliency Plan should be activated.

The Talcott Resolution Business Resiliency First Response Team is made up of the following roles:

Role	Business Group
Business Resiliency Lead	Information Technology
Safety Office	Corporate Compliance
Business Compliance	Corporate Compliance
Business Operations	Business Operations
Call Center Operations	Business Operations

3.3 TALCOTT RESOLUTION BUSINESS Resiliency RECOVERY TEAM

The Talcott Resolution **Business Recovery Team** is made up of senior functional managers. The **Business Recovery Team** assists the **Business Resiliency First Response Team** during the event to mitigate its impact on critical business processes, and afterwards to restore full business functionality as quickly as possible. The **Business Recovery Team** is responsible for ensuring all critical tasks are completed for their respective areas and raising any questions or concerns to the **Business Resiliency First Response Team**. Specific activities include:

1. Attend meetings/conference calls as established by the **Business Resiliency First Response Team** to obtain status and assess the Business Resiliency situation periodically.
2. Assess the impact of the event on their department and communicate any critical business activities that should be considered as part of the current plan (i.e. large cash flows, etc.).
3. Ensure staff are safe and critical staff are available to complete necessary tasks

The Business Recovery Team is made up of the following individuals from the following business groups:

Business Group
Business Operations
Compliance & Tax
Trading & Clearing
Process & Vendor Management
Service Operations
Strategic Relationship Management
HR Service Delivery
Communications & PMO
Investments
General Counsel
Actuarial

Procurement
CCO Separate Accounts & Broker/
Core Compliance
Finance
Chief Information Office
Investments Application Management
Talcott Resolution Applications Management
Technology Infrastructure
Chief Information Security Office & Business Resiliency
Physical Security and Special Investigations

During the transitional period, a Business Resiliency event response related to a transitional service will require coordination with **The Hartford Business Resiliency Office** ahead of, during and after a Business Resiliency event. The Hartford Business Resiliency Office will liaison with the **Business Resiliency First Response Team** and provide information on status and decisions (e.g. close early today, delay opening tomorrow).

The Hartford Business Resiliency Office contacts that assist Talcott Resolution are:

Title
Sr Analyst, Business Resiliency (Primary)
AVP, Business Resiliency (Backup)

3.5 ALL EMPLOYEES

In a Business Resiliency event, all employees should first address their own safety and that of their families. Employees are then expected to perform critical business functions to the greatest extent possible during the Business Resiliency event. Employees are responsible for working with their managers to communicate any issues and ensure that all critical functions have been completed.

The Talcott Resolution **Business Resiliency Office** maintains a list of all active Talcott employees in the Send Word Now Mass Communication application. During an event, communications with employees will be occur through the Send Word Now application.

4 BUSINESS RESILIENCY TOOLS

4.1 WORK FROM HOME

4.1.1 REMOTE ACCESS – VPN

Employees with company issued laptops/devices are able to connect to Talcott Resolution’s/Hartford’s network remotely using VPN technology. The company utilizes “Always On” VPN and the company smart card to login to the Talcott Resolution’s/Hartford’s network from a remote connection provided they have access to an internet connection.

4.1.2 REMOTE ACCESS – SSL

SSL technology allows Talcott Resolution employees, vendors and partners to connect to the network remotely from non-Talcott Resolution PCs. Remote access through SSL is the primary means through which Talcott employees **that do not have a company issued device** are able to perform critical functions in the event of loss of access to our workplace.

4.1.3 CITRIX

For employees, vendors or partners connecting remotely through SSL, all critical Talcott Resolution applications are accessible on Citrix, thus eliminating dependency on PCs located in our workspace. Once they are signed into the Talcott Resolution's/Hartford's network utilizing the Remote Access -SSL they are able to get into the Citrix environment which allows them to access the applications they will need to perform any critical tasks needed during the Business Resiliency event.

4.2 OFFSITE BUSINESS RESILIENCY OPTIONS

4.2.1 OFFSITE LOCATIONS

If a Business Resiliency event limits Talcott Resolution employee's ability to work from home; critical resources will be sent to an alternate locations (Hotel or other Talcott Resolution offices).

4.2.2 OUT OF REGION LOCATION (HOTEL, OTHER TALCOTT RESOLUTION OFFICE)

If it is expected that there will be a regional disaster Talcott may institute the Out of Region plan. Critical employees will be sent to a location (Hotel or other Talcott office) that is far enough away from the expected event so they can ensure they have access to the Hartford's network and can perform critical business tasks.

4.3 NOTIFICATION TOOL - Send Work Now

The Business Resiliency Team employs Send Word Now, a hosted Internet service, to communicate critical information during Business Resiliency events. Notices are sent via the Send Word Now application, to each employee's work email, work phone, home phone and personal cell phone (voice and SMS/text). Employees confirm receipt of the message and work with their managers to ensure business critical tasks will be completed.

4.4 EMERGENCY RESPONSE CONTACT CARD

The Talcott Business Resiliency Contact Card provides updated emergency contact info, including work, cell, and home phone numbers of **Business Resiliency First Response** and **Business Resiliency Recovery Team** members, along with other critical information, particularly the Talcott Business Resiliency Conference Line and key contacts outside of Talcott. The contact card is updated at least annually and provided to the **Business Resiliency First Response Team** and **Business Resiliency Recovery Team** members; it is updated as needed for changes in personnel or critical information.

5 BUSINESS RESILIENCY MANAGEMENT

5.1 BUSINESS RESILIENCY KEY FACTORS

The management of each business resiliency event is based on several key factors that are assessed during a business resiliency event.

- Foreseeable Event or not
- Criticality of the event (e.g. severe storm, loss of building usage, etc.)
- Duration of the event
- Staffing Impact (e.g. are critical staff impacted, has the event resulted in a loss of staff, etc.)
- Systems Impact (e.g. how many systems are down, are key systems down, etc.)

Based on the above key factors, the **Business Resiliency Coordinator and Business Resiliency Executive Sponsor** will determine if Talcott Resolution should invoke the Business Resiliency Plan. Execution and management of Talcott Resolution Business Resiliency Plan is detailed below.

The most common Business Resiliency events experienced by Talcott Resolution are weather-related, and are foreseeable.

During a foreseeable event, the **Business Resiliency First Response Team** members will maintain in advance of a potential event:

- 1) An appropriate level of attention to long-range weather forecasts.
- 2) As potentially impactful weather approaches, the **Business Resiliency First Response Team** will meet periodically to determine what if any action, should be taken ahead of the potential event.

5.2 BUSINESS RESILIENCY PROCEDURE

Should a Business Resiliency event or Potential Event occur, Talcott Resolution executes a well-defined strategy which includes the below key steps:

- 1) **Assessment of the event** - Performed by the **Business Resiliency First Response Team**.
- 2) **Outline Proposed Response Plans** – Performed by the Talcott Resolution **Business Resiliency Coordinator** in conjunction with **The Hartford’s Business Resiliency Office (if required)**.
- 3) **Determination to invoke Talcott Resolution Business Resiliency Plan** - Performed by the Talcott Resolution **Business Resiliency Coordinator** and Talcott Resolution **Business Resiliency Executive Sponsor**.
- 4) **Initiate Business Resiliency Plan** – Performed by the **Business Resiliency First Response Team** and the **Business Resiliency Coordinator**.
- 5) **Oversee Business Resiliency execution** – Performed by the **Business Resiliency Coordinator**.
- 6) **Complete post execution review** – Lead by the Business Resiliency Officer with participation all Business Resiliency teams.

5.3 PROCEDURE

- 1) Initiation of a conference call with the **Business Resiliency First Response Team**. At this call a decision will be made to whether to invoke the Talcott Business Resiliency Plan.
- 2) Once the Business Resiliency Plan is invoked, the **Business Resiliency First Response Team** would initiate a conference call with the **Business Resiliency Recovery Team** and provide the team with a status/description of the event. The **Business Resiliency Recovery Team** would be instructed to contact their respective critical staff and report back any significant business issues that should be considered.
- 3) Upon completion of the **Business Resiliency Recovery Team** conference call, the **Business Resiliency First Response Team** would initiate a Business Resiliency message via the Send Word Now communications application to all Talcott Resolution employees informing them of the next steps.

The **Business Resiliency Recovery Team** members are responsible for executing the action plan in their departments and escalating to the **Business Resiliency First Response Team** any significant gaps in availability of those they deem critical staff for this event and/or any other significant impact from the event not already accounted for in the action plan that would have been outlined on a Business Resiliency conference call.

5.4 POST BUSINESS RESILIENCY EVENT REVIEW & DOCUMENTATION

At the conclusion of a Business Resiliency event, the **Business Resiliency First Response Team** will review the operation of the Business Resiliency event and revise any Business Resiliency documentation deemed necessary. A Post Business Resiliency Event Summary document is created for each Business Resiliency event and communicated to the **Business Resiliency Recovery Team**. The post Business Resiliency event documents are stored on the Business Resiliency teams SharePoint site and maintained for 7 years. A sample of the Post Business Resiliency Event Summary document is located in the [Appendix](#) Section of this document.

5.5 BUSINESS RESILIENCY PLAN MAINTENANCE

The **Business Resiliency Coordinator** is responsible for maintaining this Business Resiliency plan. The **Business Resiliency Coordinator** works with the **Business Resiliency Office** to identify target areas Talcott Resolution will concentrate on for the upcoming year and ensure that they are part of the business resiliency plan update (i.e. Cyber, etc.) process.

In addition all Talcott Resolution departments must review and certify that they have reviewed the Talcott Resolution business resiliency plan and communicate any required updates to the plan to the **Business Resiliency Coordinator** (e.g. key person dependencies, changes in functions, etc.).

5.6 BI-ANNUAL BUSINESS RESILIENCY PLAN CERTIFICATION

In order to ensure that ALL Talcott Resolution employees are familiar with the Business Resiliency Plan, the **Business Resiliency Coordinator** will secure certification from all department managers or their designees the following:

1. Re-validate the department's readiness to perform all functions in the event of a business resiliency event and secure confirmation that all staff are aware of the Business Resiliency Plan and know how to access the Business Resiliency SharePoint site.
2. Certify that any department-specific requirements/documentation are available during any business resiliency events.
3. Update the list of department personnel and contact information for their staff
4. Confirm that critical staff are aware that they identified as critical and understand what to do in the event of a business resiliency event.
5. Confirm that critical staff have the capability to work from their home, including adequate internet service.
6. Confirm the list of critical applications and critical websites.
7. Answer/discuss any new questions/topics as determined by the **Business Resiliency Office**.

5.7 ANNUAL TESTING OF BUSINESS RESILIENCY PLAN

In order to ensure that the Business Resiliency Plan is understood and effective, The **Business Resiliency Team** will conduct an annual test of the business resiliency plan. The test includes the following:

- Testing of remote capabilities for critical and non-critical staff. The testing is performed by staff from home.
- Testing access to key cloud providers (i.e. Azure, Oracle, ADP, SAP)
- Simulate regional disasters for key office locations (Windsor, CT and Woodbury, MN).

- Verify key vendors have tested their Business Resiliency plans (i.e. DXC, Cognizant, BlackRock Aladdin, Bloomberg, etc.).
- Testing communications via Send Word Now.

Upon completion of a business resiliency test, the **Business Resiliency First Response Team** will prepare a summary of the test. The summary includes, number of test participants by location, number of testers utilizing remote access capabilities and a summary of any issues identified during the test including planned remediation of any issues.

5.8 REVIEW OF BUSINESS RESILIENCY POLICIES

The Talcott Resolution Compliance department maintains the Business Resiliency policies and procedures. As part of the annual review of the Business Resiliency plan the **Business Resiliency Coordinator** or their assignee obtains a copy of the current policies and reviews them to ensure that all items that are referenced in the policies are accounted for and addressed in the Business Resiliency Plan.

5.9 BUSINESS RESILIENCY CERTIFICATIONS / RESPONSES

As needed, the Talcott **Business Resiliency Office** will respond / assists in preparing responses for various Business Resiliency certifications. As Business Resiliency certifications are requested, they are added to the Talcott Business Resiliency Calendar so the team can plan for future certification. These requests vary and may come from the SEC, other regulatory agencies, vendors or various Board of Director meetings to name a few. Each request is handled according to the specific request.

5.10 BUSINESS RESILIENCY RECORD RETENTION

In compliance with regulatory and record retention policies, the **Business Resiliency Office** maintains Business Resiliency records for a minimum of 7 years. These records are available on the Talcott Resolution Business Resiliency SharePoint site and are secured via SharePoint permissions. The records that are retained include:

- Business Resiliency Plans
- Business Resiliency Test Results & any action plans
- Business Resiliency Test Participants
- Other key or relevant Business Resiliency documents.

6 IT DISASTER RECOVERY PLAN

Talcott Resolution IT maintains a robust disaster recovery plan including periodic testing. All Talcott Resolution data and applications running in production in the primary data center are backed up to a backup data center. As part of any application install or upgrade in the primary data center, parallel installation and testing at the backup data center is required.

7 STRATEGIC BUSINESS PARTNER, OTHER VENDORS

Strategic business partner's and other vendors performing outsourced business functions or hosting Talcott Resolution data are required at the time of engagement and periodically to complete a security and business resiliency questionnaire to assess the protection offered to Talcott Resolution data and services. Talcott Resolution will not engage a vendor whose information protection and BR/DR plans are not deemed acceptable by Talcott's Information Protection and **Business Resiliency Office**.

8.1 CRITICAL APPLICATIONS

Application Name	Recovery Time Objective
Redacted for security purposes	0-2 hours
Redacted for security purposes	0-2 hours
Redacted for security purposes	0-2 hours
Redacted for security purposes	0-2 hours
Redacted for security purposes	0-2 hours
Redacted for security purposes	0-2 hours
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Redacted for security purposes	0-2 hours
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Redacted for security purposes	0-2 hours
Redacted for security purposes	0-2 hours
Redacted for security purposes	0-2 hours

8.2 PUBLIC SAFETY RESOURCES

Resource	Address	Phone
Fire, Policy, Ambulance, Paramedics	N/A	911
Windsor, CT Police & Fire Department	340 Bloomfield Ave Windsor, CT	860-688-5273
Woodbury, MN Police Department	2100 Radio Drive Woodbury, MN	651-714-3600



Business Resiliency Event Summary

The purpose of this document is to summarize the events leading up, during and post a Business Resiliency event.

Date of Event	
Brief Description of Event	

Which office location was affected?	Was the Send Word Now communication tool utilized?	How Long did the BR event last?	Was this a regional or event?	Did the Greater Windsor or Woodbury experience major power outages?	Were Markets impacted (i.e. stock market closes)?	Were DR measures implemented?

When was Talcott Business Resiliency Executive Sponsor notified of the BR Event?

Did any Talcott Functional Areas have any significant business activity planned (i.e. large cash flow, large order volume, etc.)? If so, what steps were taken to ensure that activities were completed?

What actions were taken prior to the BR Event (include timeline and details and where possible attach emails)?

What actions were taken during the BR Event (include timeline and details)

Where any issues identified during the Business Resiliency Event? If so, outline the remediation/next steps

Business Resiliency Conclusion / Summary

Acronym	Description
BR	Business Resiliency
BRO	Talcott's Business Resiliency Office
FRT	Talcott's Business Resiliency First Response Team
ELT	Talcott's Executive Leadership Team

8.4 VENDOR BUSINESS RECOVERY CONTACTS

Vendor / Partner	Services Provided	Contact Information
Redacted for security purposes	Printing and mailing	Redacted for security purposes
Redacted for security purposes	Printing and mailing	Redacted for security purposes
Redacted for security purposes	Document Management and Business Operations Sourcing	Redacted for security purposes
Redacted for security purposes	Third Party Oversight of ILD Retained Business	Redacted for security purposes