

Code Of Ethics And Business Conduct

Talcott Resolution Code Of Ethics & Business Conduct 2

Message From The President & Chief Executive Officer 3

Act ethically and share concerns 4

Our Code ❖ Making good decisions ❖ Ways to share concerns ❖ Anonymous reporting and non-retaliation ❖ The role of managers

Respect others 6

Harassment and discrimination ❖ Bullying and abusive conduct responsibilities ❖ Drug and alcohol abuse ❖ Safety threats

Avoid and disclose conflicts of interest 8

Common conflicts of interest ❖ How to recognize conflicts of interest ❖ Ways to avoid conflicts of interest ❖ Outside employment ❖ Board of Directors ❖ Directors and Officers Insurance ❖ Personal relationships ❖ Political activities ❖ Financial conflicts ❖ Disclosure of conflicts of interest ❖ Protected activities

Protect what is ours 12

Information security ❖ Customer and employee privacy ❖ Intellectual property ❖ Other company assets ❖ Material non-public information ❖ Records retention and legal holds

Follow gifts and entertainment policies 16

Acceptable gifts and entertainment ❖ Unacceptable gifts and entertainment ❖ Gifts and entertainment needing approval ❖ Tips to avoid bribery ❖ Dealing with third parties ❖ Getting approval for facilitation fees

Manage government relationships 18

Working with U.S. Government officials ❖ U.S. Government interactions needing approval ❖ "Pay-To-Play" restrictions ❖ Working with non-U.S. Government officials

Maintain ethical standards 21

Gathering competitive intelligence ❖ Antitrust measures ❖ Office of Foreign Assets Control ❖ Anti-money laundering

Make accurate reports 23

Financial reports ❖ External requests for information

Employment at will 24

Annual certification requirements 24

Waivers or exceptions 24

Interpretation, policies, updates and modifications 24

Topics 25

Leadership team 26

Message From Pete Sannizzaro President & Chief Executive Officer

We are an independent insurance company committed to maintaining our reputation as an ethical company. Talcott Resolution's leadership team is committed to preserving our high-trust environment that fosters diversity 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.

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



A handwritten signature in cursive script that reads "Pete". The signature is written in a dark color, likely black or dark blue ink.

Act ethically and share concerns

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

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

In this topic you will learn about:

- Our Code
- How to Make Good Decisions
- Ways to Share Concerns
- Anonymous Reporting and Non-Retaliation

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. We must hold ourselves to these standards each day because we are daily faced with decisions and actions that allow us to make a difference and live the principles in our Code. By doing the right thing, we foster a culture of compliance and make 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
- Contact Compliance
- Contact EthicsPoint, Talcott Resolution's 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 then 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 EthicsPoint, our outside service provider.

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 our values, the Code, and other Talcott Resolution policies, and applicable laws. As a manager, you are always accountable to:

- Ensure that your employees understand their responsibilities under the Code and other policies
- Take opportunities to discuss the Code with employees and reinforce the importance of ethics and compliance
- Create an environment where employees feel comfortable raising concerns

- Encourage ethical conduct and compliance with our values, the law, the Code, and our policies, and discourage questionable action to achieve short-term business results

Depending on the nature of the concern:

- Immediately report known or suspected violations of the law, the Code, or our policies to Human Resources, Compliance, or EthicsPoint

Managers should handle ethical questions or concerns from employees appropriately:

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

Respect others

We demonstrate our character on a daily basis 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, we naturally avoid harmful and hurtful behaviors. We have both legal and ethical obligations to be considerate and avoid harming others either emotionally or physically.

In this section you will learn how to deal with:

- Harassment and Discrimination
- Bullying and Abusive Conduct
- Drugs and Alcohol Abuse
- Safety Threats

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

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

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.

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 in the workplace
- 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, not necessarily based on personal differences like harassment and discrimination. The mistreatment can include verbal, nonverbal, psychological, and physical abuse, as well as humiliation.

Mistreatment of others at work can cause significant stress and result in poor work performance, illnesses, absences, and low morale. It is very important to treat others at work with respect and to report any form of workplace harassment, discrimination, or bullying.

Responsibilities

You should report any form of harassment or discrimination 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 or discrimination 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.

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 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. Also, be sure to comply with all federal, state, and local laws concerning distracted driving and cell phone usage.

To the extent the law permits you to use a cell phone while driving, you must use a hands-free device with voice-activated dialing features and comply with our Distracted Driver Policy.

The company 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 duties. Failure to do so could result in disciplinary action, up to and including termination of employment.

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, or illegal possession of drugs, narcotics, or firearms
- A pretrial diversion or intervention program related to a criminal prosecution involving dishonesty, breach of trust, money laundering, sexual misconduct, or illegal possession 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 can also 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 our company 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 employee-protected 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 can typically avoid conflicts of interest with Talcott Resolution if you follow our simple [Do's and Don'ts Decision Aid](#). Keep in mind that these guidelines are not meant to restrict employee-protected communications and activities.

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

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 practice on the side
- You are asked to serve as an expert witness
- You want to serve on the board of directors or be an executive of a for-profit corporation
- You want to do work of any kind on the side for a competitor or business partner of Talcott Resolution

Board of directors conflicts of interest

Before agreeing to serve on a board of directors (other than a Talcott Resolution-owned 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 nonprofit organization are always responsible for any financial contributions they may be expected or choose to make as board members.

Directors and Officers insurance

You **will not** be automatically entitled to Directors and Officers ("D&O") insurance liability coverage under Talcott Resolution's insurance programs when serving as an outside board member. However, if you are an Executive and/or officer of Talcott Resolution, and you have been asked in writing by a Talcott Resolution Executive Leadership team member to serve on the board of a specific nonprofit organization to further Talcott Resolution's commitment to serving our communities, you will be covered under Talcott Resolution's D&O insurance program.

In these situations, you should contact Talcott Resolution's Risk Management department for more information about Talcott Resolution's D&O insurance program; you also may contact the Corporate Secretary if you have any other questions about Talcott Resolution's D&O insurance related to your outside board service if performed at the request of Talcott Resolution. In most cases, however, you will need to check with the organization on whose board you will serve to ensure they have proper Talcott Resolution D&O insurance coverage.

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.

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 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, we 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 then receive further guidance on whether you need written approval from other parties, or whether you need to take additional steps to resolve the situation.

If you think someone else at 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 we 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 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.

Protect what is ours

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

In this section, you will learn about:

- Protecting information
- Customer and employee privacy
- Intellectual property
- Other company assets
- Material non-public information
- Records retention and legal holds

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

Information security

Consequences of a data breach can be severe.

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 extra careful to keep all portable data storage devices secure at the office, and when traveling on business or working remotely. Observe secure work area guidelines in your workplace, whether you work in the office or remotely.

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 Phish Alert Report button in your email to report any suspicious email.

Customer and employee privacy

Talcott Resolution's 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.

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.

For example, electronic communications containing Personally Identifiable Information (PII), as well as company confidential information must be encrypted. Examples of PII include: Social Security numbers, passwords or PIN numbers, or other data that would allow a person to be identified.

You must immediately report any suspected or actual unauthorized access to or disclosure of information, including consumers' data, 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 this Privacy Program and related procedures developed by the business areas consistent with the Privacy Program, related standards, and procedures.

Talcott Resolution's Privacy Program includes:

- Establishing and maintaining Privacy Law standards which address the legal obligations of the company under applicable legal and regulatory requirements.
- An Incident Response Team
- A partnership between Privacy Law, Compliance, and Talcott Information Protection (TIP) that address privacy and information security-related issues which impact the company, respond to incidents, provide training, review contract provisions and address proposals

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
- TIP's information security Policies found on Talcott Resolution's internal site
- Annual Information and Privacy Training
- Code of Ethics and Business Conduct and Annual Certification

Talcott Resolution staff are required to:

- Obtain approval from their supervisor to print sensitive and/or confidential documents
- 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 company property in your possession must be returned at the appropriate time, such as after employment ends.

Occasionally, an employee will receive a payment from us to which they are not entitled, such as an overpayment of wages, 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 making a decision 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 the company and potentially violate the federal securities laws. You should consult with the Law Department before communicating information about the company's capital, financial results, and outlooks, business plans, ratings, or strategy (whether or not previously disclosed).

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. Talcott Resolution's confidential information should be classified and marked confidential and should not be disclosed outside the company without proper protection and authorization.

Understand and follow all standards, policies, and procedures that tell you how to protect, use, store, transmit, share, and destroy data and information. Standards cover, for example, technology platforms such as for the use of social media, company web meetings and blogs, and Bring Your Own Device software. If you leave the company, you can't remove, copy, use, or disclose any proprietary or confidential company or customer information.

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 the company's policies.

You also should respect the intellectual property rights of Talcott Resolution and other third parties. Ensure that you have 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

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

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

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

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

Follow these “Records Rules”

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

If you receive a subpoena or other request for documents or information from any governmental department, regulatory agency, law enforcement office, or law firm, you should report it immediately to 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 us improve and solidify business relationships. However, we must always take care not to create any appearance of an improper attempt to influence business decisions. When ethics prevail and instruct us in the way we offer and accept gifts and entertainment, there can be no appearance of a conflict of interest or impropriety.

In this topic you will learn how to recognize:

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

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

Acceptable gifts and entertainment

Whether given or received, gifts and entertainment should be:

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

Unacceptable gifts and entertainment

You should never:

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

Gifts of any value to elected officials or government representatives would need 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:

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 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

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

In this section you will learn about:

- Working with U.S. Government officials
- U.S. Government interactions needing approval
- “Pay-To-Play” restrictions
- Working with non-U.S. Government officials

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

Working with U.S. Government officials

Many activities that can seem innocent to you can actually be in violation of laws. 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 our policies before you provide anything of value to anyone connected with a government entity, or before you attempt to influence any government official. Our 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 Tiers 1-5, 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, then 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 our 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 our business. It means winning fairly, ethically, and legally. Our success and reputation depend on our compliance with many rules impacting our day-to-day interactions with customers, partners, and competitors.

In this section, you will learn about:

- Gathering competitive intelligence
- Antitrust measures
- Office of foreign assets control
- Anti-money laundering
- Internal fraud and suspicious activity reporting

Maintaining ethical standards requires knowing and abiding by the rules of fair play 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 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.

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, they may 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 the Law department
- 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

Trade sanctions prevent us from doing business with certain countries, entities, and persons. To prevent prohibited transactions, we do daily scans of customer names, vendors, payments, and related facts against U.S. government lists of specially designated and blocked persons. The scanning procedures are performed on our various administrative processing systems.

Anti-money laundering

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

- Withdrawing funds shortly after depositing them
- Contract is closed without regard to penalties
- Unusual use of cash equivalents
- Reluctance to provide identifying information
- Withdrawals to outside the United States
- Withdrawal after a recent address change
- Termination soon after owner name change

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

Suspected fraud

Any fraud or suspicious activity observed by Talcott Resolution staff must be reported and can be submitted via the following options:

- Manager
- Service Resolution Wizard available on Talcott Today/Resources/Work Tools/Brain
- EthicsPoint for anonymous reporting at www.ethicspoint.com

Make accurate reports

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

In this section, you will learn how to handle:

- Financial reports
- External requests for information

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

Financial reports

Our 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 company funds in a personal or non-corporate account. Do not attempt to influence, coerce, mislead, or interfere with the accurate preparation and auditing of financial statements. Immediately report any concerns regarding the integrity of financial reports.

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

We 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.

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. 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 we rarely grant waivers or exceptions. You should make any request for a waiver or exception before you act.

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

Interpretation, policies, updates, and modifications

The Code references many of our policies. All of our 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 our 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, our shared values will continue to guide our decisions. We always strive to act with integrity and honesty, remaining accountable in everything we do.

A

[Anti-money laundering](#)
[Antitrust measures](#)

B

[Boards, Service on](#)
[Bribery](#)
[Bullying and abusive conduct](#)

C

[Competitive intelligence](#)
[Conflicts of interest](#)
[Contact with investors and analysts](#)
[Contact with news media](#)
[Criminal convictions](#)
[Customer and employee privacy](#)

D

[Drugs and alcohol](#)

E

[Electronic communication](#)
[Endorsements](#)
[Equal Employment Opportunity](#)
[EthicsPoint](#)
[Expense reports](#)
[Expert, Serving as an](#)

F

[FCPA](#)
[Financial reports](#)

G

[Gifts and entertainment](#)
- [Generally Government relationships](#)

H

[Harassment](#)
[Discrimination in hiring](#)

I

[Information security](#)
[Intellectual property](#)

L

[Legal holds](#)
[Loans](#)
[Lobbying](#)

M

[Managers, Role of](#)

O

[Office of Foreign Assets Control](#)
[Outside employment](#)

P

[Pay-To-Play](#)
[Personal relationships](#)
[Political activities](#)
[Privacy](#)
[Protected activities](#)

R

[Records retention](#)
[Report concerns](#)
[Respect others](#)
[Retaliation](#)

S

[Safety and threats](#)
[Social media](#)

T

[Trade sanctions](#)

Executive Leadership	
Peter Sannizzaro	President and Chief Executive Officer
Ellen Below	Chief Communications Officer and Head of Implementation
Matthew Bjorkman	Chief Auditor
John Brady	Chief Actuary
Christopher Abreu	Chief Risk Officer
Christopher Cramer	Head of Tax, Deputy General Counsel, and Corporate Secretary
George Eknaian	Head of Pricing
Diane Krajewski	Chief Human Resources Officer and Head of Operations
Peter Manley	Head of Corporate Development and Strategy
Matthew Poznar	Chief Investment Officer
Lisa Proch	General Counsel and Chief Compliance Officer
Robert Siracusa	Chief Financial Officer
Samir Srivastava	Chief Information Officer
Human Resources	
Joseph Adamo	Head of Total Rewards and HR Operations
Amanda Daigneault	HR and Workforce Analytics Specialist
Julia DeSimone	HR Business Partner
Susan Dombek	HR and Workforce Analytics Specialist
Mark Hacker	Total Rewards and Service Delivery Lead
Compliance	
Christopher Conner	Assistant General Counsel, Securities and Broker-Dealer Compliance
Bridget Dunn	Head of Government Affairs, Business and Tax Law
Wendi Hedberg	Compliance Officer, Core Compliance
Jonathan Waters	Head of Corporate Law, Intellectual Property and Procurement
SIU and Corporate Security	
Randall McCartney	Head of Investigations and Corporate Security