UK Tax Strategy

Periods Covered: 2025-2026

Date of Publication: December 2025

The Hartford Insurance Group, Inc. is a US holding company for insurance and financial services subsidiaries that provide property and casualty insurance, group life and disability products and mutual funds and exchange-traded products to individual and business customers (collectively, “The Hartford” or the “Company”). Our UK operations focus on specialty insurance and reinsurance and includes a Lloyd’s Syndicate.

The following is a summary of the UK tax strategy for the subsidiaries of The Hartford as of December 31st, 2024, listed below:

Navigators Insurance Company (UK Branch)
Navigators Holdings (UK) Limited
Hartford Management (UK) Limited
Hartford Corporate Underwriters Limited
Hartford Underwriting Agency Limited
Millennium Underwriting Limited
Navigators Underwriting Limited

Commitment to Compliance

Our commitment to compliance means that we devote significant resources in order to be compliant with all aspects of UK tax law. For us, compliance means paying the right amount of tax in the right place at the right time and claiming reliefs and incentives in line with the provisions of the tax law, where available.

Risk Management and Governance

The Hartford and its subsidiaries, both individually and on a consolidated basis (collectively, “The Hartford”), act as responsible UK taxpayers. As per our Corporate Code of Ethics and Business Conduct, it is our long-standing commitment to deliver long-term economic value to our shareholders, while complying with all federal, state, local and foreign tax laws, rules and regulations that apply to any Hartford entity. To that end, specifically but not exclusively, The Hartford’s UK subsidiaries are aligned with Finance Act 2016, Schedule 19, paragraph 23(4). We do not engage in tax planning that has no commercial basis, and we will not enter into transactions that lack a commercial business purpose or are predicated upon unreasonable assumptions. We obtain advice from appropriately qualified external advisors on UK tax matters as part of our tax return compliance processes. This supplements the skills of our own Finance team when appropriate.

Oversight of Taxation Approach

The Hartford's tax policy ultimately resides with the Board of Directors of Hartford Financial Services Group, Inc. As taxation is a key element of meeting our wider business objectives, qualified representatives in our Finance department, including our Chief Financial Officer, our entity level Finance Directors, and our Head of Tax, with support from our Legal department, are involved in the oversight and management of our approach to taxation. Our International Head of Tax manages the day-to-day UK tax affairs, with responsibility for sign-off provided by the UK Finance Director (Senior Accounting Officer).

Systems and Controls in Place to Manage UK Tax Risk

The Hartford's UK subsidiaries are regulated by the United States Securities and Exchange Commission, the United Kingdom Financial Conduct Authority, the United Kingdom Prudential Regulation Authority, the New York Department of Financial Services and other regulatory bodies. We maintain a robust system of controls and risk management in each of our businesses and ensure that UK tax risk management is embedded therein. This is consistent with our global practices and regulations applicable to our businesses.

Tax Planning

Motives for Tax Planning Activities

The Hartford's UK subsidiaries may make investments in assets or engage in transactions where tax incentives, exemptions or other tax benefits are specifically authorized by laws and/or regulations of a jurisdiction in which we operate. These investments or transactions do not differ substantially from those other companies operating in similar manner and are in all aspects consistent with this policy. Principal among motives for such investments or transactions is to reduce the risk of double taxation (i.e., the same income being taxed twice in two different jurisdictions).

Acceptable Levels of UK Tax Risk

Internal Governance on Level of UK Tax Risk

We have established policies that govern our approach to managing and mitigating UK tax risk. As noted above, we do not engage in tax planning that has no commercial basis, and we will not enter into transactions that lack a commercial business purpose or are predicated upon unreasonable assumptions. The Hartford's UK subsidiaries are not prepared to accept a level of risk that would expose us to reputational harm. In addition to the regular oversight provided by our external auditors and regulators, The Hartford has a qualified and experienced Tax Team which works closely with our International Head of Tax and UK Finance team. When there is substantial uncertainty or complexity related to UK tax risk, external advisers are consulted. Further, the relevant internal controls associated with these strategies and risks are tested for efficacy on a regular basis.

Dealings with HMRC

How the business works with HMRC to interpret the law and evaluate past, current and future tax risks

The Hartford's UK subsidiaries recognize that the rules, regulations and interpretive guidance of HMRC play an important role in the business.

Wherever possible, we seek to develop and maintain an open, constructive, and cooperative relationship with HMRC, based on integrity and mutual trust and respect. To this end, we have been engaged and are working with our HMRC Customer Compliance Manager contact on a frequent basis with discussions on all areas of UK taxation.