THE HARTFORD

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MODERN SLAVERY ACT TRANSPARENCY STATEMENT

Our commitment to combatting modern slavery

This statement is published in accordance with the requirements of the transparency in supply chains provision of the Modern Slavery Act 2015 (the "Act") for the financial year ending 31 December 2023.

This statement is approved by the relevant boards and made on behalf of Hartford Corporate Underwriters Limited ("HCUL") and Hartford Management (UK) Limited ("HMUK"), part of The Hartford Financial Services Group, Inc. group of companies (collectively referred to as "The Hartford") and constitutes The Hartford's modern slavery and human trafficking statement.

The Hartford is committed to providing a work environment where everyone is treated with dignity and respect and accordingly prohibits trafficking in persons and slavery.

The Hartford Code of Ethics and Business Conduct affirms our commitment to compliance with equal employment opportunity laws and other applicable civil rights, human rights and labour laws.

Our organisational structure and our business

The Hartford is an international insurance and reinsurance business focusing on specialty products within the overall property and casualty insurance market in the UK. In addition to its longest-standing area of specialisation, marine insurance, The Hartford has also developed niches in professional liability insurance, property and casualty lines of business.

HCUL is a Lloyd's corporate member through which The Hartford controls 100% of the stamp capacity of Lloyd's Syndicate 1221.

HMUK acts as the principal employer of staff for The Hartford's UK employees and is a corporate service provider within The Hartford group companies in the UK.

The ultimate parent of the group is The Hartford Financial Services Group, Inc., a holding company for insurance and financial services subsidiaries established in Delaware, USA and publicly traded on the NYSE stock exchange. The Hartford and its subsidiaries provide property and casualty insurance, group life and disability products and mutual funds and exchange traded-products to individual and business customers.

Our staff

It is essential to our business that we maintain a fair and ethical workplace for all our staff. In our workplace, we prohibit the use of all forms of forced labour and any form of trafficking in persons.

We ensure compliance with applicable employment legislation relating to employee recruitment, including right to work evidence, and no UK staff in the UK offices are paid less than the living wage. Employees may terminate their employment by giving the required contractual notice.

We undertake employment verification checks as part of our hiring process and require agencies who supply workers to carry out employment and identification verification checks, wherever staff are located.

Our supply chains

As an insurance and reinsurance business our supply chain consists primarily of professional services, including brokers, lawyers, accountants, auditors and IT providers. We do receive certain goods, including office equipment, furniture and supplies, marketing materials and IT software from external suppliers and we contract for facilities services.

Our procurement framework for engaging with suppliers mean we are confident that we comply with relevant laws. We remain vigilant and monitor the level of risk involved throughout our supply chain.

Our policies in relation to slavery and human trafficking

The Hartford International Financial Crime Policy incorporates the requirements of the Modern Slavery Act to ensure that modern slavery and human trafficking has no part in our business. The Hartford Group also maintains an Anti-trafficking and Prohibition of Slavery Policy.

Combined with this we also have in place a Whistleblowing/Speaking Up Policy applicable not only to all staff at The Hartford, but also available to suppliers, agents and employees of subsidiary firms. The policy confirms our commitment to ensuring that wrongdoing is prevented, and that should it arise, it is dealt with promptly. The policy provides a route through which concerns about wrongdoing can be raised without fear of reprisals or victimisation. Particular focus is given to any circumstances which may suggest that there has been a failure to comply with legal obligations or the endangerment of an individual's health and safety.

Due diligence

We anticipate that the contractors, suppliers and other business partners in our normal supply chain would adhere to their own high standards in the pursuit of preventing modern slavery, and would in their practices ensure that all employees and workers are treated with dignity and respect in a fair and ethical environment. As part of this, we will consider potential areas of exposure in relation to these standards when reviewing prospective contracting partners. In particular:

- Procurement questionnaires require high-risk third party suppliers to state what steps they take to comply with such standards;
- Procurement agreements require third party suppliers to comply with applicable, inter alia, financial crime and anti-slavery laws and regulations and permit The Hartford to terminate relationships where they fail to do so.

Training

Our HR, Legal, Compliance and Risk teams are aware of and trained in the requirements of the Modern Slavery Act.

We also providing regular training for staff on sanctions restrictions, anti-bribery, anti-money laundering, and The Hartford Code of Ethics and Business Conduct to which they must attest.

We provide training and support for all staff on how and where they can raise concerns about wrongdoing and assurances they will not suffer reprisals for doing so. Our Whistleblowing/Speaking Up Policy explicitly refers to our commitment to ensuring that modern slavery and human trafficking in all forms plays no part in our business or its supply chain.

Our Progress

Throughout the past year we have sought to address priorities outlined in our 2023 statement. During Q1 2024, the Financial Crime Policy was enhanced and training rolled out to all Hartford International staff in May 2024. The Whistleblowing and Speaking Up Policy was also refreshed. A new procurement framework has also been established for external vendors and suppliers aligning with Group due diligence and risk assessment process.

Looking ahead

The Hartford is committed to maintaining and improving systems and process to prevent slavery and human trafficking. The Hartford's Procurement, Risk, Compliance HR and Legal teams work together to apply these standards to our business. Currently a more mature due diligence process for procurement is under development with The Hartford Group.

We continue to develop our policies and procedures to make our commitment to anti-slavery and human trafficking clear to our customers, employees, suppliers and business partners. The Hartford Group are in the process of reviewing and updating Group HR policies to include the Anti-Trafficking and Prohibition of Slavery Policy which will be accessible to all International staff. This will include a new QR Code as an additional way to Speak Up and report concerns.

We continue to strive to be a responsible business through environmental efforts and charitable partnerships and International has implemented a strong and robust social strategy as one of the pillars of its ESG strategy, continuing to enhance this throughout 2024.

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Signed on behalf of Hartford Corporate Underwriters Limited

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Signed on behalf of Hartford Management (UK) Limited

July 2024