

## Retaliation-Free Workplace Policy

### **Overview**

The Hartford prohibits any form of retaliation or intimidation against employees who report good-faith concerns of discriminatory, harassing or unethical conduct, or who participate in investigations of such conduct.

### **Rationale**

A culture of diversity, respect and strong corporate ethics is best achieved through open communication, including open and candid discussion about compliance with applicable laws, regulations and Hartford policy. All managers are responsible for creating and maintaining a work environment that encourages employees to speak up about potentially inappropriate business practices or behavior.

### **Scope**

This policy applies to all employees and contractors of The Hartford.

### **Prohibition Against Retaliation**

The Hartford provides a variety of avenues for employees to report good faith concerns about potentially inappropriate business conduct or behavior without retaliation or intimidation, in accordance with applicable laws and regulations (See **Code of Ethics and Business Conduct**). Likewise, The Hartford provides various means for employees to make good faith reports of alleged discrimination, harassment or intimidation as described in the **Reporting and Investigating Discrimination and Harassment Policy**.

In accordance with applicable laws and regulations, The Hartford prohibits any form of unlawful retaliation or intimidation against any person for making good faith reports concerning allegations of discrimination, harassment, violations of the Code of Ethics and Business Conduct, or any other allegations of inappropriate business practices or behavior. The Hartford similarly prohibits any form of unlawful retaliation against any person who participates in good faith in any investigation or other proceeding related to such a report, even if the Company ultimately concludes that no violation of law, regulation, the Code of Ethics and Business Conduct or Company policy has occurred.

The contractor will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information.

Hartford employees who engage in unlawful retaliation or intimidation in violation of this Policy will be subject to disciplinary action, up to and including termination. Any person who retaliates against another person for reporting actual or potential violations of laws or regulations also may be subject to criminal and civil liability under federal and state laws.

### **Cooperation with Investigations**

In accordance with the Code of Ethics and Business Conduct, all Hartford employees are required to cooperate with internal investigations undertaken by The Hartford. In particular, among other things, employees are required to make themselves available to internal investigators immediately upon request, be forthcoming and truthful with investigators, and provide complete and accurate information.